



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
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Please Respond to:
Division of Forestry
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March 6, 2009

Financial Assistance Programs Division
USDA Natural Resources Conservation Service
1400 Independence Avenue, SW., Room 5237S
Washington, DC 20250-2890

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RE: Docket Number NRCS-IFR-08005

The Florida Division of Forestry appreciates the opportunity to comment on the interim final rule for the Environmental Quality Incentives Program.

In light of the emphasis provided by our legislators to include nonindustrial private forest owners and forestry practices in the 2008 Farm Bill, the National Priorities should be reviewed to insure they provide the forestry emphasis sought by the legislature. We feel it would be appropriate to add "**forests**" to the list of statutory resource concerns listed in Section 1466.4(a).

Forests provide many benefits sought through the national priorities such as reduced soil erosion, clean air, abundant clean water, and wildlife habitat. In addition, forests provide an efficient method of trapping and storing carbon as long lived wood products, thereby reducing atmospheric carbon dioxide (CO₂). **Increasing the quantity, productivity, and health of private forests** to obtain these benefits should be a national program priority.

Many times throughout the interim final rule, reference is made to "farmers and ranchers". This terminology may be misunderstood as exclusive of nonindustrial forest owners. We suggest replacing "farmers and ranchers" throughout the rule document with "**farmers, ranchers, and nonindustrial forest owners**". Inserting "nonindustrial private forest owner" would also be appropriate in the definitions of "Limited Resource Farmer or Rancher" and "Socially disadvantaged farmer or rancher".



Florida Agriculture and Forest Products
\$97 Billion for Florida's Economy

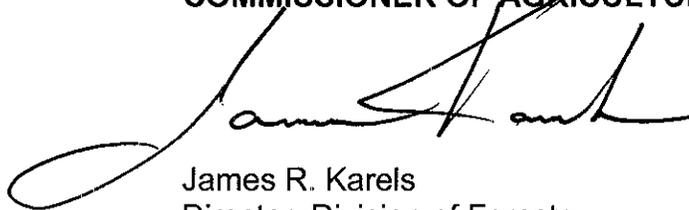
Section 1466.8(c)(2)(i) should read, "The land is a working component of the participant's agricultural and/or forestry operation, and".

Section 1466.23 addresses considerations in developing a list of conservation practices and setting payment rates. Paragraph (a)(5) indicates a practice's ability to assist producers in meeting regulatory requirements is a consideration. We feel a practice's ability to assist producers in meeting **voluntary standards** such as Florida's silviculture best management practices should also be a consideration in developing practices and payment rates.

Thank you for your assistance in promoting natural resources conservation and forest management for private landowners. The Florida Division of Forestry looks forward to assisting NRCS and Florida's private landowners in the implementation of the Environmental Quality Incentives Program.

Sincerely,

CHARLES H. BRONSON
COMMISSIONER OF AGRICULTURE

A handwritten signature in black ink, appearing to read "James R. Karels", written over a faint, larger signature of Charles H. Bronson.

James R. Karels
Director, Division of Forestry

JRK/atg

CC: Steve Jennings, Forest Management Bureau Chief
Bonnie Stine, Cooperative Forestry Assistance Supervisor