



**NATIONAL ASSOCIATION OF STATE FORESTERS**  
**444 North Capitol Street, NW, Suite 540, Washington, DC 20001**

August 15, 2006

Robin Heard  
Acting Director  
Easement Program Division  
Natural Resources Conservation Service  
P.O. Box 2890  
Washington, DC 20013-2890

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RE: Healthy Forests Reserve Program interim final rule

Dear Ms. Heard:

On behalf of the National Association of State Foresters, I am writing to provide comment on the interim final rule for the Healthy Forests Reserve program (Title V of the Healthy Forests Restoration Act), published in the Federal Register on May 17, 2006. NASF is a non-profit organization that represents the directors of the state forestry agencies from all fifty states, eight U.S. territories, and the District of Columbia. State Foresters manage and protect state and private forests across the U.S., which together encompass two-thirds of the nation's forests.

NASF supported the passage of the Healthy Forests Restoration Act and actively participated in developing regulations to implement several titles of the Act. We have a long-standing working relationship with NRCS in providing technical assistance services for implementing conservation programs with private forest landowners.

The following comments on the rule reflect NASF's suggestions for strengthening the program to better meet the intent of the law:

Eligibility

Most USDA forestry assistance programs are limited to non-industrial private forest lands. However, HFRP is open to all private lands, including industrial forest lands, without an acreage cap for each ownership. We recommend limiting program eligibility to non-industrial private forest lands so that funding is focused on those areas where the greatest needs and benefits can be realized.

Healthy Forest Restoration Plan

This rule should clarify whether or not existing plans prepared for other forestry and conservation programs, such as multi-resource Forest Stewardship Plans, would be acceptable if their content is consistent with the requirements of an HFRP plan. Many forest landowners with existing forest management plans have invested time and money to develop their existing plans, and every effort

should be made to help landowners avoid redundant planning requirements.

In addition, we believe State Conservationists should work closely with State Foresters to develop HFRP plans, as State Foresters can provide valuable expertise on forestry technical issues and on-the-ground management.

#### Technical Assistance

State Foresters have a long history of working with NRCS to help implement conservation and forestry programs by providing technical assistance to forest landowners. We encourage NRCS to work closely with State Foresters who can provide the necessary forestry expertise and technical assistance to successfully implement this program.

In some instances eligible landowners may need to employ the consulting services of private natural resources professionals in order to enroll within an acceptable time frame. NRCS should consider allowing participating landowners to be compensated for these expenses.

#### Cost-Share Rates

We encourage NRCS to use actual costs, including maximum caps, rather than average costs for determining cost-share assistance reimbursement rates. The actual costs for establishing some practices in certain areas can greatly exceed the average costs, as these actual cost are often very site specific.

In conclusion, we look forward to working with NRCS to make the Healthy Forests Reserve Program a success, both for the forest ecosystem and for forest landowners. We are encouraged with the recent pilots in three states to address several species of concern and their forested habitat. Please contact us with any question or if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. Hull", written in a cursive style.

James B. Hull  
President