

Subject: Comments on 7 CFR Part 625 - Healthy Forests Reserve Program Interim Final Rule

I have the following comments concerning the Healthy Forests Reserve Program.

1. Section 625.2 – Definitions – I find it highly unusual that a program to protect forestland does not contain a definition of forestland. I would like to see a definitive statement of what will be considered forestland under this program. I suggest the following definitions may be used: a) Land carrying forest growth with at least 10 percent crown cover or, if less than or lacking it, bearing evidence of former forest and not now in other uses. b) An ecosystem characterized by a more or less dense and extensive forest cover. c) A plant community predominantly of trees and other forest vegetation, growing more or less closely together. I personally like the first definition because of the 10% crown cover requirement. Crown cover would need to be defined also if it is used in the definition of forestland. That definition should be – the ground area covered by a tree crown as delimited by the vertical projection of its outermost perimeter.
2. I think it highly irregular that this program places so much emphasis on protecting endangered species and very little emphasis on protecting the forest ecosystem. It also bothers me that the agencies that understand forests and forestry are not intimately involved in the selection or management of selected and approved sites. I believe that there needs to be more emphasis on the review and approval of proposed sites by professional foresters. I would like to see a requirement that all plans must be approved by the State Forester, or an equivalent person, as well as the State Conservationist. Review and approval by the State Forester would ensure that selected sites are truly managed in a way that will sustain the forest ecosystem.

Thank you for the opportunity to comment on this rule.

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