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**From:** imacfarlane@stateforesters.org  
**Sent:** Tuesday, October 05, 2004 3:22 PM  
**To:** FarmBillRules  
**Subject:** CSP interim final rule comments from NASF  
**Attachments:** ATTACHMENT.TXT; NASF Comments on CSP Interim Final Rule 10.5.04.doc

See attached.

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Financial Assistance Programs Division  
Natural Resources Conservation Service  
P. O. Box 2890  
Washington, DC 20013-2890

October 5, 2004

Dear Sir or Madam:

On behalf of the National Association of State Foresters, I wish to comment on the Interim Final Rule for implementing the Conservation Security Program (CSP). NASF represents the state forestry agencies of the fifty states, the District of Columbia, and the eight territories. State Foresters deliver a number of cooperative programs aimed at assisting private landowners and communities to manage forested lands and protect those lands from insects, fire, diseases, and other threats.

While CSP is a program focused on agricultural producers, we support the inclusion of incidental forestland in the eligibility criteria. We appreciate that the definition of incidental forestland has been clarified to include forested parcels up to 10 acres in size, not to exceed 10 percent of the enrolled acreage. However, we feel that limiting individual parcels to 10 acres undermines the intent of the program. We suggest removing the maximum parcel size requirement, while increasing the allowable total to 20 percent of the enrolled acreage.

NASF ultimately recommends that all non-industrial forestland – regardless of size – be eligible for enrollment. However, we recognize that this recommendation is beyond the scope of the federal rule-making process.

We appreciate the inclusion of agroforestry practices in the eligibility criteria in the interim final rule. Such agroforestry practices as strip cropping and alley cropping can play an important role in conservation on agricultural operations.

Thank you for the opportunity to comment on the new Conservation Security Program. We look forward to following this program closely during its initial implementation.

Sincerely,

*/S/ Pat McElroy*

Pat McElroy  
President