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Arlen Lancaster, Chief
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ATTN: Arlen Lancaster, Chief, Natural Resources Conservation Service

The United States Department of Agriculture Forest Service has reviewed the Farm and Ranch Lands Protection Program (FRPP) Interim Final Rule, July 27, 2006, as published in the Federal Register, Vol. 71, No. 144. On the subject of the eligibility of forest lands for FRPP funding, we offer the following comment.

Change in Eligibility of Forest Lands

Under the Interim Rule, the Natural Resources Conservation Service (NRCS) proposes to raise, for FRPP projects, the amount of allowed forest cover to up to two-thirds of the easement acreage. This directly conflicts with a statement made in the first paragraph of the section, which reads: "In June 2002, NRCS instituted a policy to ensure that FRPP would not compete with the Forest Legacy Program. The 2002 policy set out in the NRCS Conservation Program Manual, Part 519 defined "incidental forest land" as any land less than 50 percent of the total easement area." In agreement with this policy, we believe that the proposal to raise eligible forest cover to 67 percent of the easement acreage would put FRPP in a situation to compete with the Forest Legacy Program (FLP), and therefore recommend that eligible forest cover for FRPP projects remain at the current level of up to a maximum of 50 percent. FLP requires that projects have at least 75 percent forest cover (allowing up to 25 percent of non-forest cover including farming, ranching, and wetlands), allowing the Forest Service to focus limited federal dollars on targeted resources. Keeping the allowable forest cover for FRPP projects to 50 percent would be more compatible with FLP.

We are interested in and willing to work with NRCS to ensure that FRPP implementation is consistent with that of FLP. Please contact Kathryn Conant, Forest Legacy Program Manager, at 202-401-4072, for questions or discussion.

Sincerely,



LARRY PAYNE
Director, Cooperative Forestry

