



December 30, 2005

Secretary of Agriculture Mike Johanns,  
Farm Bill  
1400 Independence Avenue, SW  
Washington, DC 20250-3355

RE: Federal Register notice (Vol. 70, No. 116, pp. 35221-35222)

SUBJECT: Comments on Upcoming 2007 Farm Bill

ALASKA

AMERICAN SAMOA

ARIZONA

CALIFORNIA

COLORADO

COMMONWEALTH  
OF THE NORTHERN  
MARIANA ISLANDS

FEDERATED STATES  
OF MICRONESIA

GUAM

HAWAII

IDAHO

KANSAS

MONTANA

NEBRASKA

NEVADA

NEW MEXICO

NORTH DAKOTA

OREGON

REPUBLIC OF THE  
MARSHALL ISLANDS

REPUBLIC OF PALAU

SOUTH DAKOTA

UTAH

WASHINGTON

WYOMING

I am writing on behalf of the Council of Western State Foresters (CWSF) regarding how the 2007 Farm Bill can most effectively address critical environmental and natural resource conservation goals on non-industrial private lands. On October 1, 2005 the CWSF submitted written comments with a note that further comment would be forthcoming. A copy of that original letter is enclosed. Please consider these the forthcoming comments. The CWSF represents the State Forestry Agencies whose responsibilities include delivery of technical and financial assistance, and wildfire and forest health protection services to non-industrial private forest landowners in the twenty three states and territories of the western United States.

Approximately 60% of the nation's forest-related watershed protection, fish and wildlife habitat, and support for air quality are provided by non-industrial private forest lands. These landowners typically embrace a strong "land stewardship ethic", however, unlike their agricultural counterparts, their lands do not produce regular annual income. Consequently, many of these forest owners face fiscal challenges to implementing environmental protection and conservation practices. Additionally, they typically have little or no background in forestry or conservation and, therefore, require technical assistance and educational resources in order successfully implement conservation practices on their lands.

The Forestry Title of the 2002 Farm Bill, which created the Forest Land Enhancement Program (FLEP), had several very positive attributes which we hope can be retained and strengthened in the 2007 Farm Bill to maximize forest-related conservation practices:

- Flexibility to allow customization of the program to meet state and local conservation needs.
- Inclusion of all three critical program components -- technical, financial, and educational assistance -- while providing for state discretion regarding allocation of each of these resources proportionate to state and local needs.
- State and local prioritization to maximize program effectiveness in addressing resource issues.
- Protection and enhancement of multiple resource categories under a single program.
- Program development and implementation in the context of a long-term strategic plan that addresses multiple resource priorities across the landscape.
- Utilization of a simple, landowner-friendly process.
- Support for private sector providers and local economic development.
- Involvement a wide cross section of public and private partners in program development and implementation

We strongly support the retention of these proven-positive attributes in any and all forestry related provisions of the new Farm Bill.

Unfortunately, several 2002 Farm Bill Conservation Programs have not realized their full potential of promoting conservation practices on non-industrial private forest lands. In some programs, notably the Environmental Quality Incentive Program (EQIP), important forestry issues have received little or no attention in some localities. Additionally, in many of the Farm Bill's conservation programs, forest lands are only eligible when determined to be "incidental" to agricultural operations. This provision has excluded the majority non-industrial forest lands and substantially limited the potential of the Farm Bill to effectively address critical ecosystem issues in the West, specifically your question #4 in the Federal Register notice.

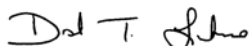
We strongly encourage inclusion of appropriate language in the 2007 Farm Bill that will ensure that forest landowners are equally eligible, and fairly treated, in the development and implementation of all of the Farm Bill's conservation programs. Such language would go a long way in addressing your concerns in questions 4 (achievement of conservation and environmental goals), 5 (enhancement of rural economic growth), and 6 (opportunities to expand agricultural products, markets, and research).

We specifically encourage consistent provisions, in each of the Farm Bill's conservation programs, to address critical forest ecosystem issues in the West (question #4):

- Restoration and maintenance of healthy forest ecosystems.
- Reduction of catastrophic wildfires and large-scale insect infestations.
- Ecosystem restoration following wildfire and insect damage.
- Protection of life, property, and forest ecosystems in the Wildland Urban Interface.
- Protection of critical watersheds, including public and tribal lands in proximity to non-industrial private forests.
- Habitat protection for Threatened and Endangered Species under the Endangered Species Act.
- Support for long-term retention and active management of non-industrial private forest lands to maximize public environmental and economic benefits, including carbon sequestration.
- Support for forest-related rural economic development.
- Support for agro-forestry conservation practices which protect soil and water resources and improve wildlife habitat.

We look forward to a new Farm Bill that will further strengthen conservation programs which enable family forest owners to maximize the environmental and economic contributions of their lands to society.

The Council of Western State Foresters, the National Association of State Foresters, and State Forestry Agencies in the west and nationwide, stand ready to assist in the successful development and implementation of the forestry-related conservation provisions of the 2007 Farm Bill.



David Limtiaco  
*Chair, Council of Western State Foresters*

Enclosure