



October 19, 2009

CRP SEIS
c/o TEC, Inc.
8 San Jose Drive
Suite 3-B
Newport News, VA 23606

Dear Sir/Madam:

The National Association of State Foresters (NASF) is a non-profit organization comprised of the directors of all of the nation's state and territorial forest management agencies. Our members have a public trust responsibility for managing, restoring and protecting two-thirds of the nation's forestland, which is held in private or non-federal public ownership. We greatly appreciate the opportunity to provide the following comments regarding the Commodity Credit Corporation (CCC)/USDA Farm Service Agency's Notice of Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for the Conservation Reserve Program (CRP). This NOI was published in the Federal Register on September 3, 2009.

NASF prefers Action Alternative 1 as it would achieve and maintain full enrollment in CRP. Losing CRP acres runs counter to national efforts to sequester carbon, reduce greenhouse gas emissions, and mitigate climate change. Marginal lands enrolled in CRP that are properly managed will also continue to provide wildlife habitat, protect water quantity and quality and enhance wildlife habitat. We recommend providing sufficiently attractive soil rental rates and incentives that will make CRP general signups and continuous enrollment economically competitive and suggest FSA address the criteria for scoring competing offers.

Cost-share assistance provided through CRP will help advance Secretary Vilsack's vision to restore the health of all of America's forests including those held in private ownership. We support Action Alternative 1 as it will enable additional program enrollment in continuous CRP practices including forest restoration activities (e.g., restoring longleaf pine in the southeastern United States). Herbicide treatments, prescribed burning and tree thinning are key tools that should be permitted at any time during the CRP contract in order to restore forests and improve their ability to provide wildlife habitat alongside other environmental benefits. NASF recommends the Farm Service Agency (FSA) give due consideration to maintaining or enhancing technical and financial assistance available to program participants for applying forest restoration practices.

The Food, Conservation and Energy Act of 2008 (2008 Farm Bill) included changes to CRP that called for the program to address issues raised by state, regional and national conservation

Executive Director
Jay Farrell

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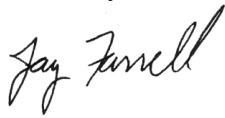
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initiatives. As the CCC/FSA considers changes to CRP, the SEIS and subsequent rulemaking should consider the state-wide assessments and strategies for forest resources required per section 8002 of the 2008 Farm Bill. The State Forest Assessments will provide an analysis of forest conditions and trends in the state and will delineate priority rural and urban forest landscape areas. The state forest resource strategies will provide long-term strategies for investing state, federal and other resources to manage priority landscapes identified in the assessments. The state assessments and strategies will be completed in June 2010.

We greatly appreciate your consideration of our recommendations and look forward to working with FSA as the agency moves forward with the SEIS and subsequent rulemaking. Please do not hesitate to contact us in the event you have questions as you move forward with both efforts.

Sincerely,



Jay Farrell

2010 Executive Committee