



January 13, 2020

Deirdre Holder  
 Regulatory Analysis and PRA Requirements Team Lead  
 Farm Production and Conservation Center  
 1400 Independence Ave., SW  
 Washington, DC 20250-0572

Re: Docket No. NRCS-2019-0020  
 Proposed Conservation Stewardship Program Rule Changes  
 Published 11/12/2019 in 84 FR 60883, pp. 60883-60900

Ms. Holder:

The National Association of State Foresters (NASF) is pleased to provide comments on the above referenced proposed rule changes to the Conservation Stewardship Program (CSP) in response to amendments approved in the 2018 Farm Bill.

NASF is comprised of the heads of forestry agencies in all 50 states, U.S. territories, and the District of Columbia. Among our most important constituents are non-industrial private forestland owners. CSP offers these private forestland owners annual payments to implement a wide variety of forest management practices, such as prescribed fire, integrated pest management, tree/shrub planting, and wildlife habitat improvement.

We were very pleased to see that authorized funding for CSP will steadily increase through 2023. We also appreciate that forestland owners' project proposals will continue to be ranked in separate, state-specific pools, helping to ensure their proposals can compete alongside more traditional agricultural-conservation projects for CSP support. Additionally, state foresters were pleased to see that the development of Forest Stewardship Plans will continue to constitute technical assistance under CSP.

One of the proposed changes to the rule would allow for one-time payments to forestland owners when a comprehensive conservation plan is developed specifically for their operation. State foresters believe this new provision will incentivize forest management plan development and allow for technical service providers to be compensated for the assistance they provide in preparing these plans.

**Executive Director**  
 Jay Farrell

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*South Representative* Rick Oates, Alabama

We look forward to following the proposed modifications as they develop further. Thank you for the opportunity to provide feedback and for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Gregory J. Josten". The signature is written in a cursive style with a long horizontal stroke at the end.

Greg Josten  
NASF President  
South Dakota State Forester