



October 18, 2017

Leonard Jordan
Acting Chief, NRCS
1400 Independence Avenue SW #5105A
Washington DC 20250

Mr. Jordan:

The National Association of State Foresters (NASF) represents the heads of all 50 state forestry agencies in the country, as well as those for the District of Columbia and the US Territories. One of the principal functions of state forestry agencies is to provide on-the-ground technical expertise to forest landowners. Often this service involves helping landowners apply for government cost share dollars to implement desired forest management projects on their properties, and the NRCS Environmental Quality Incentives Program (EQIP) is one of the most heavily used cost share opportunities. In 2016 over 84 million EQIP dollars were used to implement forestry practices.

As referenced in the 2008 Farm Bill, Forest Stewardship Plans, prepared under the Cooperative US Forest Service/State Forestry - Forest Stewardship Program, are recognized as able to meet EQIP's management plan requirements for forest practices. In fact, there are agreements in place that allow mutual recognition of Forest Stewardship Plans, plans prepared for the American Forest Foundation's Tree Farm Program and plans prepared by/for NRCS. Attached is the most recent Memorandum of Understanding outlining the mutually understood commitments of the Joint Forestry Team, which includes both NRCS and NASF, as well as the National Association of Conservation Districts (NACD) and the US Forest Service (USFS). Coordination of planning processes is an appropriately prominent element of our cooperative efforts. Yet, there are instances around the country where landowners have been informed by the State NRCS Office that their Forest Stewardship Plan is inadequate for EQIP purposes and additional planning is required.

We have worked with NRCS, NACD and the USFS for over three years now to get a better understanding of this issue and to identify potential solutions. It appears that in some instances, Forest Stewardship Plans may have the level of information required for compliance with NRCS policy regarding EQIP, but that State NRCS Offices do not have sufficient forestry expertise to interpret the plans and complete the necessary federal paperwork. We note that the number of professional foresters in the agency has continually dwindled over the past decade. Consistent with our Joint Forestry Team agreement and the objectives of the new administration, NRCS can achieve greater efficiencies by doing more to leverage existing state forestry agency capacity and expertise.

We also see benefit in reviewing NRCS policy to ensure that it is not unnecessarily creating additional compliance requirements. For example, could National Environmental Policy Act legal obligations be met at the programmatic/national level as opposed to the individual project level? Are detailed practice plans an absolute requirement for purposes of accounting for the expenditure of EQIP dollars or can this need for accountability be met in some other fashion? Streamlined recognition of forest management plans,

Executive Director
Jay Farrell

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burdensome requirements for trained state forestry professionals to qualify as Technical Service Providers (TSPs), and inconsistent implementation of the Joint Forestry Team MOU in some states also remain challenges. It may be useful to closely examine NRCS policy to see where improvements can be made through legislation, rule-making and/or internal direction.

In other instances, we acknowledge that Forest Stewardship Plans - for some specific cases - may not have the detail necessary for EQIP purposes, or may perhaps not even be sufficient to meet the National Forest Stewardship Program Standards and Guidelines. It may be necessary for all involved to revisit the role and scope of management plans. We understand that NRCS intends to take a close look at CAP 106 Plans across all resource uses. This includes the qualifying forest management plans that are prepared by TSPs and which are distinct from Forest Stewardship Plans prepared by state forestry agencies, or their contractors. NASF and the other members of the Joint Forestry Team have been informed of this process and assured that we will be involved.

We appreciate this outreach, but feel the conversation must be much more comprehensive to ensure that we are applying the most cost-effective approaches to realizing the on-the-ground, desired forest conservation practices that we all collectively seek. The discussion needs to include:

- The role of landscape level, multi-ownership plans;
- Multi-agency/multi-cooperator approaches to working within priority landscapes;
- Potential for expanding the role of state forestry personnel as TSPs;
- Consideration of known best practices for achieving landowner engagement;
- The relationship between management plans and practice plans as seen by all agencies and partners, not just NRCS;
- The potential role of more generalized rather than detailed plans;
- Methods for providing program accountability for multiple programs without having to employ multiple systems;
- Approaches to meeting NRCS's need for additional forestry expertise; and
- Streamlining regulatory requirements so that we are all operating as efficiently as possible.

The National Association of State Foresters' Forest Resource Management Committee stands ready to initiate this important discussion. Notably, we will be meeting in Washington, DC in December and would like to invite key partners to a strategy session where we can begin to organize the best possible approach for cooperatively delivering forest landowner assistance that gives forest landowners ready access to federal cost share opportunities. We would welcome the participation of one of your staff in developing the agenda for this strategy session. If you would like to designate someone for that purpose, please let me know.

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Sincerely Yours,

Joe Fox
State Forester of Arkansas

Enclosure (JFT MOU)

CC: James Tillman, Acting Associate Chief for Conservation
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