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Secretary of Agriculture Mike Johanns  
Farm Bill  
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Washington, DC 20250-3355

**Comments To Be Used in Developing USDA Recommendations for the 2007 Farm Bill**

To Secretary Johanns,

These comments respond to the USDA's request for comments to be used in development of recommendations for the 2007 Farm Bill. We appreciate the USDA's process in requesting for public comment. We are taking the opportunity to share our thoughts regarding the importance of private lands conservation for ecosystem services and for community development.

The Rural Voices for Conservation Coalition (RVCC) is comprised of local, regional, and national organizations that have joined together to promote balanced conservation-based approaches to the ecological and economic problems facing the rural West. The RVCC is committed to finding and promoting solutions through collaborative, place-based work that recognizes the inextricable link between the long-term health of the land and the well being of rural communities. The coalition is made up of organizations from Arizona, California, Idaho, Montana, New Mexico, Oregon, Washington, and Washington, DC.

The RVCC is working to use the vision of community-based forestry (cbf) to help address policy issues in private lands settings in the West. The cbf vision recognizes the interdependence of the health and sustainability of natural ecosystems and human communities. In private lands settings, this vision suggests the following principles:

- Restore and sustainably manage private forestlands using a combination of public and private resources.
- Protect working forests from development pressures, enabling families to stay on their land, and supporting local economies.
- Cooperate and manage across ownerships, sharing risks and benefits across landownership types.
- Recognize ecosystem services from private lands and reward private landowners for providing them.

The RVCC would like to emphasize that our vision is to pursue policies and programs that integrate private forest conservation and community development. That said, we are responding to questions in the Federal Register Notice that treat the issues as separate, specifically question 4 regarding environmental and conservation goals and question 5 regarding rural economic growth.

#### **QUESTION 4. THE ACHIEVEMENT OF ENVIRONMENTAL AND CONSERVATION GOALS**

Non-industrial private forestlands provide valuable ecological, social, and economic benefits to individual landowners, adjacent communities, and to the general public. These benefits, also known as ecosystem services, include but are not limited to air and water filtration, stormwater flow reduction, carbon sequestration, energy conservation, fish and wildlife habitat protection, wood products for manufacturing, and nontimber forest products. Private forestlands are threatened by suburban development and sprawl, lack of professional advice and assistance in forest management decisions, fuel build-up and the associated risk of destructive wildfire, invasive species, pests and diseases, and an array of other factors.

If landowners are to successfully restore their lands and continue to provide valuable ecosystem services to the public, they cannot bear the associated costs alone. Simply holding these lands as forests is a challenge for many private landowners. Maintaining and improving the ecosystem services from their lands is more than most landowners will be able to achieve without assistance.

Current public policies are inadequate to sustain and restore the integrity of healthy forest ecosystems. While many private landowners have been enthusiastic about existing programs, federal funding levels have been insufficient and have lacked the consistency needed to build broad participation

The 2007 Farm Bill could provide the necessary authorities and adequate funding levels for federal agencies to collaboratively assist landowners to sustainably manage their lands. Market-based, as well as voluntary incentive-based approaches hold promise to help meet these costs in the future. In addition, the RVCC and other community-based forestry groups are looking for ways in which communities might take a greater role in the long-term protection and management of private forests by acquiring rights in forestland at risk of fragmentation or conversion to non-forest uses.

#### **CURRENT PROGRAMS**

The RVCC is generally supportive of the wide range of USDA programs that currently provide assistance and resources for the protection and conservation of private forests. Key program areas, discussed below, include: technical assistance to private forest landowners, cost-share assistance to help private forest landowners with the costs of various restoration and sustainable forestry practices, and innovative investment programs to help with the acquisition and long-term protection of working forests.

- **Provide technical and educational assistance to nonindustrial private forests owners.**

Landowners need technical and educational assistance if they are to meet the restoration and stewardship goals for their forestlands. A range of technical and educational assistance programs are currently authorized, though there are many

obstacles to actual on-the-ground implementation of these programs. USDA agencies, including the Forest Service, NRCS, and CSREES, need clear authorities and capacity to provide technical and educational assistance to landowners and encourage peer-to-peer mentoring for those landowners wishing to participate. Assistance may come from a range of professionals, including service foresters, state foresters, fish and wildlife professionals, hydrologists, and cooperative extension professionals. Given limited capacity, we encourage the use of prioritization based on restoration and social goals to determine where and to whom technical assistance and resources should go using a collaborative process such as the State Forest Stewardship Coordinating Committees.

- **Increase funding for cost share assistance to non-industrial private landowners Clarify intended recipients of existing legislation.**  
In order for landowners to effectively utilize existing financial assistance programs to carry out restoration activities, adequate and predictable funding needs to be available. The RVCC has been supportive of cost-share programs for private forest landowners, such as FIP, SIP, and more recently of FLEP, however as funding for these programs has diminished, landowners are left with great expectations and little realized gain. In addition, current legislative language regarding other agricultural conservation programs, such as EQUIP, needs to be clarified to explicitly include the opportunities available for private forest landowners to participate in these programs.
- **Support conservation and maintenance of working forests through tools such as conservation easements allowing for purchase of specific rights on private lands.**  
Conservation easements are a tool for maintaining working forests, preserving environmental values, protecting communities from excessive development pressures, and providing long-term certainty to those selling or donating easements. The RVCC supports conservation easements as a tool for helping to keep forests as forests. The Forest Legacy Program has been instrumental in addressing development pressures on family-owned forests and could continue to be useful in addressing land divestment issues. It might also be useful in the creation of markets for ecosystem services as it could provide long-term assurance of protection of enrolled lands to those investing. The Forest Legacy Program could also be adapted to address a variety of land conservation needs, such as protection of smaller parcels of private forestland around rapidly developing urban centers or protection of larger parcels of private forest in more remote settings.

## NEW IDEAS

The RVCC has developed several ideas through which the USDA could further assist private forest landowners in the restoration and stewardship on their lands. These include provision of incentives for restoration and cooperation across ownerships and assistance to communities with the acquisition of forestlands.

- **Provide incentives to non-federal forest landowners to restore their forestlands and to cooperate across ownerships**

Private forestlands provide a range of ecosystem services making it critical for the federal government to recognize the public benefits supplied by private lands and invest in the restoration of private lands. Moreover, to realize the full range of benefits and services that come from forests at a landscape level, it is necessary for landowners to have incentives that encourage cooperation with one another and with the public agencies.

The Agencies need to provide leadership in the development of markets for ecosystem services, particularly acknowledging the importance of those services that are achieved through cooperative landscape-level management.

Suggestions on how to achieve this in the Farm Bill include the following:

- Develop a process for prioritizing the allocation of cost-share funds based on criteria and needs agreed to by a diverse and collaborative group such as the State Forest Stewardship Coordinating Committees.
  - Develop tiered incentives for forest landowners, wherein the more they do to restore and sustainably manage their lands, the more resources they receive to assist them with their efforts.
  - Within the cost-share incentive programs, provide incentives for non-industrial private landowners to participate in sustainable forestry certification programs that involve multiple landowners. Many non-industrial private forest landowners are interested in certification but the investment in certification does not make sense for individual non-industrial private forest landowners. This federal investment would promote cooperative efforts among non-industrial private forest landowners to have their land certified.
  - Encourage the development of markets for ecosystem services, such as the markets that are developing for carbon credits on private forestlands in several states including Oregon, Montana, and California.
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- **Community-Owned Forests**

Across the country, millions of acres of private forestlands are being put up for sale by forest products companies, other timberland investors, and nonindustrial private forestland owners. If, as often occurs, purchasers divide and convert the forests to residential or other development uses, nearby communities face losing the critical economic, environmental, recreational, social, cultural, and aesthetic values and benefits those forests have traditionally provided. One option being pursued by some communities is to acquire the lands to manage them as community forests, now and for the future. Community-owned and –managed forests can be found around the world, and are not a new concept. Some New England “town forests,” for instance were established nearly a century ago. The recent surge of interest in community forests in the U.S., however is unprecedented. In response, a three-day national conference was held in Missoula, Montana, in June, 2005 to bring together practitioners from around the country to explore issues, options, and experiences in community forest establishment, governance, management, and use.

A number of innovative ideas emerged from the conference, as well as from ensuing discussions among RVCC members, including:

- USDA should propose a study as part of the Farm Bill to explore conservation and environment issues related to the sale, fragmentation, and conversion of private forestlands, particularly industrial forestlands, in the U.S.
- Conservation bonds are a form of low-interest loan that could help to reduce the cost of capital for communities that want to acquire forestlands. Legislation authorizing the use of such bonds has been proposed in Congress as well as at the state level in Washington.

## **QUESTION 5. THE ENHANCEMENT OF RURAL ECONOMIC GROWTH**

In RVCC's integrated vision of community-based forestry, the achievement of environmental and conservation goals, as discussed in Question 4, and the enhancement of rural economic growth, as discussed in this question, are interdependent and cannot be separated. The conservation of private forests, like public forests, cannot be achieved without investments in their long-term stewardship, which requires a blending of professional and technical knowledge, practical experience, and the willing—and hopefully enthusiastic—involvement of landowners. To fully appreciate and benefit from the ecosystem services provided by these lands, an appropriate social and economic infrastructure is needed, such as a skilled workforce, businesses that can provide services to landowners and create markets for the products and services from private forest lands, and local governmental and non-governmental institutions that can provide assistance and facilitate planning and collaboration among landowners and other local entities.

In many rural communities of the West, as well as in other parts of the country, the local infrastructure necessary for forest stewardship has been changing and diminishing. The loss of mill capacity and traditional forest workers has been especially tied to areas with a large federal forest presence. In many other areas, however, private landowners have difficulty finding workers or contractors skilled in doing the types of forest restoration or sustainable management activities for which they are looking. They also have difficulty finding local businesses, or markets, for products on their lands.

While this type of social and economic infrastructure is essential to the long-term stewardship of private forests, it is also critical to the social and economic well being of rural communities. This infrastructure is necessary to create jobs, to stimulate new businesses and market development as contributions toward sustainable local economies, and to re-establish and maintain the social fabric necessary to help landowners and diverse interests in communities to live and work together.

USDA has provided important programs in the past to help rural communities build and maintain their social and economic infrastructure. The Forest Service has provided technical and financial assistance through several important programs and authorities. The RVCC believes it is important to maintain, in fact to strengthen, these types of programs in order to pursue the vision of community-based forestry, that is, the long-term conservation and stewardship of forestlands and rural communities with vibrant and resilient economies.

## CURRENT PROGRAMS

The RVCC has supported and promoted efforts to develop and implement programs that enhance economic growth in rural communities. We are concerned that the authorities and resources being made available for these activities have been diminishing and are insufficient to meet the needs for building and maintaining a social and economic infrastructure.

- **Provide permanent authorities to the Forest Service to offer technical assistance to communities and private landowners.**

The Forest Service needs to be able to collaborate with and provide assistance to communities on issues related to sustainable forests and communities, across mixed ownership landscapes. Currently, the Forest Service is authorized annually through appropriations bills to provide technical assistance to rural communities for sustainable rural development. The FY2005 bill (PL 194-54, Title III) reads: "Funds appropriated to the Forest Service shall be available for interactions with and providing technical assistance to rural communities for sustainable rural development purposes." To further encourage agency officials to engage in these technical assistance activities for rural development, they need to know that the authorities have legislative will behind them, rather than being an annually authorized item which may or may not appear in the appropriations bill.

- **Strengthen Forest Service programs to provide both technical and financial assistance to rural communities.**

The RVCC is concerned that in the past several years, programs in rural development have been cut and that provision of small, flexible grants such as those provided through the Economic Action Programs have received diminishing support. The programs and monies have played a critical role in the capacity building and business development needs of resource dependant communities. The RVCC recommends that the USDA carefully review roles of the Forest Service in rural development activities. They currently have the authorities to carry out technical assistance, capacity building, and rural development work, but greater clarity from USDA needed.

## NEW IDEAS

The RVCC has come up with a number of ideas for the 2007 Farm Bill that would enhance rural economic development through workforce training, flexible grants for capacity building, and cooperation across ownerships through the use of landowner cooperatives, and biomass utilization across public and private forest land ownership.

- **Training and workforce**

Workforce training and certification programs that are focused on restoration that meet the needs on private lands are needed. This workforce needs to be able to connect with landowners as well as the needs on the land. Jobs dealing with all stages of wood and nontimber forest product extraction and processing need to be developed. The agencies

might consider development of a program like the Pacific Northwest Jobs in the Woods program for private forests.

- **Support flexible grants to build capacity and achieve forest restoration**

Technical and financial assistance is needed for community capacity building and for development of local infrastructure for business technologies, business development skills, and marketing capacity. Federal dollars invested in these activities through cost-share grants are highly leveraged by state and local public programs and private dollars. In the past, Economic Action Programs accomplished much of that soft infrastructure development. Programs like SARE or block grants may be useful as models for capacity building in forest-based communities in the future.

- *SARE*

The Sustainable Agriculture Research and Education (SARE) program, administered by USDA's **Cooperative State Research, Education and Extension Service (CSREES)**, provides broad grants and flexible authorities for small entities. We think that SARE, or something like it, could help forest-based communities to address community capacity issues and other forest restoration issue through a grants program. In other words, we are exploring this as a program we could possibly replicate in the forest sector, perhaps as a model to rebuild a small-grants program, similar to EAP, which has an integrated vision, including both conservation and community infrastructure.

- *Block Grants*

Natural Resources Block Grants, modeled after the Community Services Block Grants could provide a mechanism for awarding small grants of up to \$100,000 for natural resources related capacity building and business development in urban and rural communities. Many different types of groups, from community-based non-profit organizations to land trusts could access these funds. Grant recipients would receive a set amount of funding each year for a long period of time (10 to 20 years). Money would be used to build capacity and build leverage from nonfederal sources. The major advantages of this type of program are that funding is reliable, there is an existing model in place and working well, and leverage would be built for the federal dollars spent.

- **Biomass Utilization for Sustainable Rural Development**

There is a great deal of potential for using woody biomass from public and private forestlands for sustainable rural development purposes. As other programs for forest-based rural economic development have declined, there have been efforts through energy legislation and biomass grant programs to provide incentives and opportunities for woody biomass utilization. The 2007 Farm Bill should continue these efforts to encourage the use of woody biomass associated with both public and private forest restoration. The Farm Bill will need to grapple with issues such as appropriate scale and appropriate incentives for both energy and value-added uses.

Thank you for providing the opportunity for the RVCC to share our thoughts regarding the importance of private lands conservation for ecosystem services and for community development.

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