



American Forest Foundation

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November 5, 2008

Ms. Paulette Smith
Beginning Farmer and Rancher Development Program
Competitive Programs Unit
Cooperative State Research Education and Extension Service
U.S. Department of Agriculture
STOP 2240
1400 Independence Avenue, SW.
Washington, DC 20250-2240.

RE: CSREES-2008-0003

Dear Ms. Smith:

The American Forest Foundation is pleased to offer comments on the Beginning Farmer and Rancher Development Program, as modified in the 2008 Farm Bill. We are particularly interested in this program's potential to cultivate the next generation of family forest owners. We urge you to ensure initiatives targeted at family forest owners are eligible for funding under this program.

The Foundation, through its network of over 90,000 family forest owners, conservation partners, and environmental educators, strives to create a future where North American forests are sustained by a public which understands and values the social, economic, and environmental benefits they provide to our communities, our nation, and the world.

Families and individuals own roughly 262 million acres, the largest forest ownership group in the U.S. These family-owned forests, sometimes referred to as nonindustrial private forests, conserve our water, provide wildlife habitat and recreational opportunities, clean our air, and produce renewable forest products and energy. Family forest owners rate family heritage and land stewardship as top reasons for owning their land while at the same time express strong concern about keeping the land intact for future generations.

Just like farmers, family forest owners are aging--one-third of the 4.4 million family forest owners are 65 years and older. These families want to pass their land on to the next generation in their family or to a new owner that will be a good steward of their land.

The Beginning Farmer and Rancher Development Program (BFRDP) has the potential to address these rising challenges for farmers, ranchers, and forest owners. Family forest owners, just like

farmers, are in the business of conserving our natural resources and supplying the nation with food, feed, fiber, energy and wood products.

As land values rise and development pressures increase on forests, with an average of 1 million acres of forest converted to non-forest uses each year, it is increasingly difficult for families and individuals to own forests and to pass them on to future generations.

Seeing the great potential for this program to address one of the biggest challenges facing family forest owners, the American Forest Foundation offers the following points for your consideration in developing the Program's rules:

- Initiatives targeting the next generation of family forest owners should be eligible for funding under this program, just as those targeting traditional farmers and ranchers. This should be stated clearly in the implementing regulations.
- Partnerships are critical to achieving the goals of this program. Projects with strong partnerships with existing landowner networks should be given high priority.
- Strong accountability and performance measures should be required to ensure the program is achieving desired results.
- Education teams should also include a focus on curricula, programs, and workshops geared to family forest owners.
- Given the large number of family forest owners and the number of aging owners, priority should be placed on initiatives that assist forest owners with intergenerational transfer.

Targeting Family Forest Owners

As mentioned above, family forest owners own a large expanse of the rural landscape. These lands are critical to conserving our natural resources, supporting jobs and economies in rural communities, just as traditional farm and ranch land. Helping forest owners pass on their land or helping new owners purchase land, is critical to maintaining the rural way of life.

We urge CSREES to explicitly state in the implementing regulations, that family forest owners and initiatives focused on these owners are eligible for assistance through this program. Additionally, program regulations should provide flexibility to include projects that help new forest owners develop management and business plans, plan their estate, access markets including ecosystem and wood products markets, or implement management practices. This will provide clear direction for potential applicants of the intention of the program.

We also request that CSREES include a representative of family forest owner interests on any panel established to review grant proposals for the Program.

It is important to note that USDA's existing department-wide regulation on beginning farmers and ranchers (issued in August of 2006), includes landowners who have woodlots and forests. Thus, it is consistent with Departmental policy to include initiatives aimed at family forest owners in the Beginning Farmer and Rancher Development Program.

Additionally, including family forest owners in this Program would be consistent with the Congressional direction provided in many farm bill conservation programs that now include forest owners, along with farmers and ranchers.

Partnerships

It is clear Congress intended the Beginning Farmer and Rancher Development Program to utilize existing networks to reach landowners. Utilizing existing networks can also help leverage non-federal funds and resources, making the Program even more effective.

The American Tree Farm System, a program of the American Forest Foundation, is the largest family forest owner network in the country, with over 90,000 owners who own over 24 million acres of forest. The Tree Farm System is designed to help these families manage their land sustainably and keep it in the family. These landowners are only a fraction of the family forest owner population but they are critical for “neighbor to neighbor” efforts where forest owners convey messages to other forest owners on topics such as starting up a forest business or getting help with estate planning. Initiatives proposed under this Program should be rated on the extent they utilize existing networks and partnerships.

Accountability

The Foundation believes strongly in accountability and performance-based approaches to Program management. We are not just interested in reaching a certain number of landowners, or enrolling them in our programs, we are interested in achieving measurable results on the ground. Key performance measures for family forest initiatives could include outcomes such as the number of landowners who have taken significant steps towards sustainable management of their forests or number of landowners who have a management or estate plan that outlines how the land will be passed on to their heirs or sold to a beginning forest owner.

Education Teams

It is important to note that while family forest owners face many of the same challenges as farmers and ranchers, the nature of managing a forest, whether it’s contracting with a forestry professional or setting up accounting systems to track finances, is much different than farming. Thus, it is important that education teams are set up to develop curriculum, programs, and workshops targeting forest owners, as well as farmers and ranchers.

Funding Priority

As mentioned previously, roughly one-third of the 4.4 million family forest owners are over age 65. These owners are struggling with how to pass their land on to their families or how to make sure their land is passed to another family that is going to carry on similar stewardship practices. If these families don’t consider their options and think about this in advance, it becomes much harder to keep the land in family ownership and keep the land forested.

Funding priority should be focused on addressing this issue, assisting forest owners with intergenerational transfer and assisting new and potential family forest owners with the purchase and management of forest land.

In addition, as means to prioritize as well as optimize program funding, we encourage greater consideration be given to those proposals that link with other Farm Bill programs, particularly conservation programs.

As you can see, there is much potential for this Program to help with one of the biggest challenges facing family forest owners. In addressing this challenge through this program, the Agency would be investing in efforts that ultimately help conserve a large portion of the nation's forests and the rural communities that rely on them.

We look forward to working with you as you implement this program.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren M. Wilson". The signature is written in a cursive, flowing style.

President