

Thank you for the opportunity to comment on 36 CFR Part 230 RIN 0596-AC84 Community Forest and Open Space Conservation Program posted in the Federal Register / Vol. 76, No. 4 / Thursday, January 6, 2011 / Proposed Rules.

The Proposed Rules state "The State Forester or equivalent Tribal Government official may provide technical assistance to applicants in the preparation of applications and implementation of grants".

The Proposed Rules require that applications for the program be tied to a landscape-level conservation or management plan. It is unclear whose plan this is may be. Many federal, state and non-profit landscape-level plans have been crafted unfortunately they are not necessarily complementary. Is the plan the State Resource Assessment and Strategy completed by State Foresters per the Farm Bill? Although the intent seems to be linking the Community Forest Conservation Program to existing plans and efforts, it is very likely that existing plans will need to be revised to explicitly include this program.

The Proposed Rules also require that the State Forester or equivalent Tribal Government official review and assess all applications.

This program puts an increased workload and unfunded responsibility on the State Forester or equivalent Tribal Government official since technical assistance funding is only available for implementation after a grant is awarded in their jurisdiction.

Finally, it is unclear what annual reporting and monitoring is required, if any, by the State Forester or equivalent Tribal Government official, or the grant recipient.

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