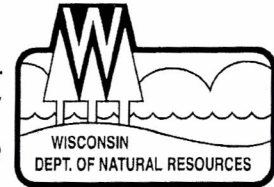


State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
101 S. Webster Street  
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Scott Walker, Governor  
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March 7, 2011

Community Forest Program  
U.S. Forest Service  
State and Private Forestry, Cooperative Forestry  
1400 Independence Avenue, SW.  
Code 1123  
Washington, DC 20250

The Wisconsin Department of Natural Resources, Division of Forestry would like to thank you for the opportunity to comment on the proposed rule for the Community Forest and Open Space Conservation Program. This Program may assist in filling a niche for land acquisition by local governments, Tribal Governments and non-profit organizations.

Section 230.3(d)(1) Provide an assessment of each application

The rule indicates the State Forester will provide an assessment of each application and in other areas of the document it references the State Forester making recommendations on the applicants. WDNR would like to see additional clarification on what is needed in the State's assessment/recommendation of the project to help determine the level of the state's involvement in CFP.

Section 230.6(d)(5) Cost share contributions can be cash, in-kind services, or donations and must meet the following requirements: Not include borrowed funds.

A typical source of cost share contribution is likely to be in the form of bonded monies. Depending on how the term borrowed funds is defined cost share contributions from bonded sources may or may not be eligible. WDNR would like to ensure these funds are eligible as a form of cost share contribution.

General Comments

- WDNR appreciates that the State is not being asked to monitor or enforce any of the terms of the grant agreement or program details. WDNR would like to ensure state does not have responsibility when they are not in the agreement between the applicant and the Forest Service.
- CFP proposed rule seems to include flexibility with the amount of involvement and technical assistance provided by the States. However, even with the technical assistance grants provided to the States for assisting applicants with acquisition, WDNR may not be able to provide much assistance due to limited time and staff resources.
- With limited funding levels in the CFP Program, it may be beneficial to restrict the number of applications being submitted for funding from each state. The application process and due diligence necessary to ready the project for acquisition can be extensive for applicant. It may be discouraging for applicants to complete the application process when the possibility of funding is low.
- WDNR would like to ensure the requirements for the Community Forest Plan are flexible to allow amending current management plans to meet the requirements of the CFP Program.

The WDNR Division of Forestry appreciates the opportunity to share our comments on the proposed rule for the CFP Program.

Sincerely,

*Paul DeLong by Bob Mather*

Paul DeLong  
Chief State Forester  
Wisconsin Department of Natural Resources