Director of CEPD
USDA FSA CEPD
Stop 0513
1400 Independence Ave., SW.,
Washington D.C. 20250-0513

Subject: Comments on proposed BCAP rule as printed in the Federal Register
Volume 75, No. 25 / Monday, February 8, 2010, pages 6264-6288.

As current chair of the Granite State Division of the Society of American
Foresters (GSD-SAF), I was asked to comment on the proposed rules of BCAP by the
membership, as a resolution during our annual business meeting, on February 12, 2010.
Our membership consists of many professional foresters and natural resource managers
from throughout the state of New Hampshire, many of whom are active participants or
have knowledge of BCAP.

In the proposed rules, forest landowners participating in BCAP must implement
one of the following: a conservation plan, forest stewardship plan or an equivalent plan.
If a forest landowner does not qualify to participate because they are lacking one of these
plans, they can opt to participate in the program through an aggregator or logging
contractor. An aggregator or logging contractor can qualify for BCAP by implementing
rules set forth as an eligible material owner.

As professional resource managers, we at GSD-SAF feel that some level of
professional oversight should be mandated through the program. Conservation plans
should include any lands enrolled under the guidelines of a conservation easement, of
which is held and overseen by a third-party requiring responsible forestry practices take
place. Forest stewardship plans designated by the State Forester, should include any plan
written by state licensed foresters and recognized by state forestry agencies, as a
qualifying forest stewardship plan. An equivalent plan should include certificates issued
by a third-party certification program such as American Tree Farm System (ATFS),
Forest Stewardship Council (FSC), or Sustainable Forestry Initiative (SFI). All of these
programs are recognized throughout the nation as qualified third-party certification
systems and endorsed by the Society of American Foresters.
The requirement for forest landowners to have one of the three qualifying plans is a step in the right direction. This logic should also apply to aggregators and logging contractors as well. By doing so, it will help ensure that BCAP promotes the production of energy from the region’s forest in a sustainable manner. If not then BCAP is nothing more than an incentive to promote expanded short term production of the energy products without the forethought of sustainability of the forests. If the same does not apply, then forest landowners, which must have an approved plan, should be reimbursed at a higher rate. This would seem to be in the true spirit of the program.

Thank you for considering our comments.

Sincerely,

Scott D. Rineer
Milan, NH resident
Chair of the Granite State Division of the Society of American Foresters

Cc: Executive Committee of GSD-SAF