

Decker, Denise - Washington, DC

From: Elisabeth Moore [emoore@ctfarmland.org]
Sent: Monday, March 23, 2009 2:34 PM
To: RA.dcwashing2.grp
Subject: Comments on GRP; RIN 0578-AA38

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Below are comments from the Connecticut Farmland Trust concerning the Grassland Reserve Program Interim Final Rule as published on January 21, 2009. Thank you for this opportunity to provide you with our thoughts on this important program.

We strongly encourage the USDA to address the following issues to improve the program's effectiveness:

1) Eliminate the new requirement for a market analysis and reinstate the use of an individual appraisal for determining the value of a GRP easement. "One size does not fit all" -- a market analysis will not accurately reflect the fair market value of a property. In CT, and likely a host of other states, it is very difficult to determine a per acre easement market value for a region or county. Every property has different characteristics -- topography, road frontage, suitability for development, to name a few. These differences directly impact value. Our biggest concern is that this "broad brush" approach will discourage landowners from applying and ultimately protecting their land.

2) Increase the percentage of incidental land allowed. CT's farms are diverse landscapes -- a majority include woodlands, hedgerows, and farm roads, in addition to pastures and fields. Limiting the percentage of incidental land that may be included in a GRP easement to 10% will result in awkward configurations that may not be the best conservation outcome. In addition, these configurations will be difficult to steward.

Thank you again for offering us the opportunity to comment. Please contact me if I can provide any additional information.

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Elisabeth Moore
Director of Conservation
Connecticut Farmland Trust
77 Buckingham Street
Hartford, CT 06106
(860) 247-0202
<http://www.CTFarmland.org>
emoore@CTFarmland.org