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From: ahanson47@comcast.net
Sent: Friday, March 13, 2009 11:18 PM
To: RA.dcwashing2.frpp
Subject: Docket Number NRCS-IFR-08006

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To Whom It May Concern RE Docket Number NRCS-TFR-08006:

In 2008, Congress made significant changes to the federal Farm and Ranch Lands Protection Program (FRPP) to allow for greater flexibility by program partners at the state and local level.

One key change was to state that the federal government's role in the program is to facilitate and provide funding for the purchase of conservation easements, not to purchase the easements directly. Unfortunately, in the Interim Final Rule released in January, the U.S. Department of Agriculture essentially ignored this change and continued many of the program's cumbersome requirements that have made FRPP a difficult partner in state and local farmland protection efforts.

The rule should be changed to reflect Congressional intent and to work more effectively for farmers and state and local program partners.

The USDA must address the following five issues to improve the program's flexibility for state and local partners:

1. Make it clear that the federal government is not purchasing a federal property interest, but rather the right to enforce the terms of an easement when and if necessary;
2. USDA should establish a meaningful certification process to reduce cumbersome and unneeded program requirements for experienced entities;
3. While well-intentioned, the new forest management plan requirement is burdensome and should be eliminated or significantly revised;
4. The rule should follow Congressional intent and give program partners the flexibility to design and implement their own impervious surfaces standards; and,
5. The new national ranking criteria do not adequately recognize state and local farmland protection goals; entities that become certified should be allowed to use their own criteria for ranking farmland protection projects.

Sincerely,
Art Hanson
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