

**Decker, Denise - Washington, DC**

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**From:** Cindy Gray [cgray@srfconsulting.com]  
**Sent:** Friday, March 13, 2009 12:26 PM  
**To:** RA.dcwashing2.frpp  
**Subject:** Docket Number NRCS-IFR-08006.

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***Comments regarding the draft rules for the Farmland and Ranchland Protection Program, Docket Number NRCS-IFR-08006:***

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

- The role of 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;
- USDA should establish a meaningful certification process to reduce cumbersome and unneeded program requirements for experienced entities;
- The new forest management plan requirement is burdensome and should be eliminated or significantly revised;
- The rule should follow Congressional intent and give program partners the flexibility to design and implement their own impervious surfaces standards; and,
- 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.

Please consider my comments.

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