

Decker, Denise - Washington, DC

From: Ginny Schneider [ginnyschneider@hotmail.com]
Sent: Tuesday, March 17, 2009 11:45 AM
To: RA.dcwashing2.frpp
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bwagner@farmland.org
Subject: Docket Number NRCS-IFR-08006

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To Whom It May Concern:

I consult with Equity Trust (equitytrust.org), an organization that has worked to save farms for 18 years. The model we use focuses on making farms affordable to farmers in perpetuity. These are my recommendations re the docket number listed in the subject line of this email:

Make the federal interest in farm property the last resort. There are many nonprofit conservation and land trust organizations throughout the US that already hold property interests and enforce easements to ensure the affordability and sustainability of farms. They should be the groups to monitor and work with farmers on a day-to-day basis. The federal government, in this case, should be the party of last resort.

There should not be a certification process for such nonprofits that hold property interests. Their records should stand for their ability to act in this capacity. There are too many regulations. One more certification process adds paperwork and time that many of these groups would rather spend stewarding land.

It is unclear that a ranking system is beneficial. Many times a project needs to move forward due to the urgency of losing the farm. This and the factors that come together to save the farm seem difficult to rank. It would seem that being flexible and assessing which farms are at the highest risk, involve the largest tracts of land and have farmers and community members who are willing to spring into action would be a way to decide where to expend resources. Generally, those working on the ground on these conservation efforts have a sense of this.

What would be useful is conducting a state-by-state inventory of all farms and then a survey of the farmers to understand whether their farms are at risk.

Sincerely,

Ginny Schneider

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