

**Decker, Denise - Washington, DC**

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**From:** Julie harrell [photonicgirl@yahoo.com]  
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**To:** RA.dcwashing2.frpp  
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We believe USDA must address the following five issues to improve the program's flexibility for state and local partners:

- 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;
- USDA should establish a meaningful certification process to reduce cumbersome and unneeded program requirements for experienced entities;
- While well-intentioned, 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.

Om Shanti,  
Jules

[www.photonicgirl.blogspot.com](http://www.photonicgirl.blogspot.com)  
[www.cherryplainfarm.blogspot.com](http://www.cherryplainfarm.blogspot.com)