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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.