

**Decker, Denise - Washington, DC**

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**Sent:** Friday, March 13, 2009 10:51 PM

**To:** RA.dcwashing2.frpp

262

Regarding **Docket Number NRCS-IFR-08006**,

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. \*\*\*

Sincerely,  
Gene and Marilyn De Meyer  
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