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Office of Farmland Preservation

Washington State
Conservation Commission
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July 29, 2009

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Office of Farmland Preservation
P.O. Box 47721
Olympia, WA 98504

Jon Glover, Acting Director,
Easement Programs Division, USDA-NRCS,
Farm and Ranch Lands Protection Program
P.O. Box 2890
Washington, DC, 20013

RE: Docket Number NRCS-IFR-08013

Mr. Glover,

Thank you for the opportunity for Washington State's Office of Farmland Preservation to submit
~~comments on the Interim Final Rule referenced as Docket Number NRCS-IFR-08013.~~

Recently, the Office of Farmland Preservation was able to communicate with several land trusts in the state in gathering background information on state spending on farmland preservation. The question was all non-FRPP funds spent on farmland preservation. This question led to several comments which fit the Interim Final Rule Section 1491.6.

The comments were mirrors of each other and are summarized as follows.

Projects fell short in several of the national criteria areas. There are several areas in the state that much spending and focus is being directed. Yet, these areas score poorly in several areas due to the fact that these areas are neither growing fast enough or have a high population density. Most received zero points in each of these criteria areas out of the 200 points possible. Yet, state and local programs have targeted these areas in part due to landowner willingness and development pressures.

Unfortunately most of these entities will likely not score in these areas for many years. These two criteria are and will always be tough for Washington. Another concern is a short fall in the criteria for proximity to other protected areas. Most projects received zero points out of 100 because there were no other protected lands within one mile of projects.

This national criteria effectively shuts out many of our states prime lands, prime lands that score high in all other categories and are the focus of state and local efforts.

Our concern and recommendations are based on American Farmland Trust's comments. We at the Office of Farmland Preservation want to echo those comments and recommendations and respectfully request they be considered in the final rule making process.

Issue: Ranking consideration and proposal selection.

Comment:

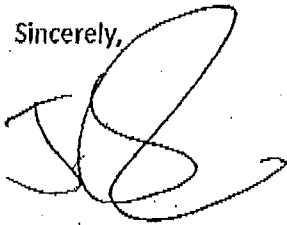
- Section 1491.6 of the Interim Final Rule outlines a series of very specific national criteria for scoring and ranking projects for selection in the program. The program's statutory language makes no mention of the need for such a process.
- For many state and local farmland protection programs, the national criteria may conflict with established state or local program criteria that are tied to clear, locally-driven goals and objectives

Recommendation:

- Certified entities should be allowed to use their own ranking considerations and proposal selection process for individual projects rather than NRCS national and state criteria.
- In some states, NRCS may need to compare projects across the spectrum of applications submitted by certified and non-certified entities. To allow comparison, NRCS should identify broad categories of ranking criteria to be covered by certified entities in their criteria and selection process. These categories would ensure consideration of a common set of resource and location issues such as soils, land type, farm size, development pressure and proximity to other farms and protected lands without imposing the specificity of nationally applied criteria on certified entities as now envisioned in the IFR

Again, thank you for you and your colleague's efforts to make better this important program.

Sincerely,



Josh Giuntoli
Washington State Conservation Commission
Office of Farmland Preservation