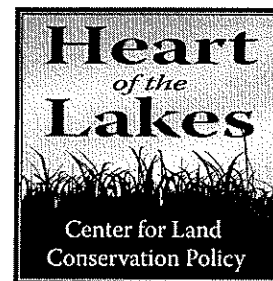


578



August 3, 2009

Easement Programs Division
Room 6819-S
Natural Resources Conservation Service
U.S. Department of Agriculture
P.O. Box 2890
Washington, DC 20013-2890

300 North Bridge Street
Grand Ledge, MI 48837

Phone: 517.925.8649
Fax: 517.659.5999
www.heartofthelakes.org

RE: Farm and Ranch Lands Program Comments

Heart of the Lakes Center for Land Conservation Policy continues to support the comments submitted by American Farmland Trust and those of the Land Trust Alliance concerning the Farm and Ranch Lands Protection Program (FRPP) Interim Final Rule (Docket Number NRCS-IFR-08013) as published on January 16, 2009.

Heart of the Lakes represents Michigan's land conservancies who regularly use the FRPP program in partnership with local government and the state of Michigan to conserve farmland. We applaud the NRCS for revising the "contingent right of enforcement" to conform to Congressional intent. However, we believe **USDA must still address the following five issues to further improve the FRPP flexibility for state and local partners**, as outlined by American Farmland Trust:

- Requirements regarding easement terms and conditions should reflect new interpretation of "contingent right of enforcement",
- Certification should be used to provide a meaningful way to reduce administrative review for experienced entities,
- Forest management plan requirement should be eliminated or significantly revised,
- Impervious surfaces policy should be revised, and
- National ranking factors should be reconsidered.

Heart of the Lakes' mission is to promote and advance land conservation in Michigan by advocating sound conservation policies and strengthening land conservancy effectiveness. The organization is the voice and convener of Michigan's land conservancies who work to protect lands with natural, recreational, scenic, and agricultural value.

We request that our support of American Farmland Trust's and Land Trust Alliance's comments be considered and adopted as NRCS revises the amended rule and implements the program.

We appreciate the opportunity to provide these comments and encourage you to contact us should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Rachel Kuntzsch". The signature is written in a cursive style with a large, looping "K" at the end.

Rachel Kuntzsch
Executive Director

cc Glen Chown, Grand Traverse Regional Land Conservancy
Brian Price, Leelanau Conservancy
Russ Shay, Land Trust Alliance
Bob Wagner, American Farmland Trust