

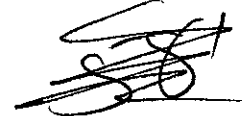
PUBLIC SUBMISSION

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Comment On: CCC_FRDOC_0001-0095
 Farm and Ranch Lands Protection Program

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General Comment

I am the owner of Creative Conservation, LLC a land use consulting firm in Maine. As part of my business, I assist land trusts and state agencies with conservation acquisitions. I also represent many landowners that are involved with conservation donations and sales. Over the past 20 years I have coordinated over 100 conservation transactions both fee and conservation easements. Many of these projects have included funding from various federal agencies.

In recent years, I have had the opportunity to be the project manager for numerous FRPP farmland protection projects in Maine. I have found the FRPP program to be incredibly frustrating and inefficient due to inflexible program criteria; easement requirements that are overly rigid and complex and do not fit the needs of Maine agriculture; and required procedures that both waste limited resources and delay projects. The success rate of farmland protection projects in Maine is discouraging (when compared with other conservation programs) with numerous high quality projects simply not being able to survive the process.

Land protection, with federal assistance, need not be that difficult. The Forest Legacy Program, also within USDA, provides a much more effective model that allows states to administer their land protection program in an efficient manner within clear federal guidelines. I have completed many Forest Legacy projects in Maine and have found the state-federal partnership to generally

work quite well.

I would strongly urge that USDA restructure FRPP into a state grant program that allows the States to administer the program according to federal guidelines without unnecessary federal involvement in the details of each easement project. If this were to occur, I believe that we would be able to protect more farmland at less cost in Maine and across the country.

Thank you for this opportunity to share these thoughts with you.