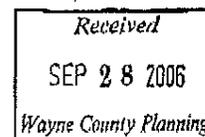


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FRPP - IFR - CRAFT

Received 9/28/06
gjs

September 14, 2006

Mr. Gary Craft
4572 Lincoln Road
Macedon, NY 14502

Robert Glennon, Farm and Ranch Lands Protection Program Manager
Easement Program Division
USDA Natural Resource Conservation Service (NRCS)
1400 Independence Ave, SW Rm 6819-S
Washington, DC 20250-1400

Dear Mr. Glennon:

I am writing in response to the Interim Final Rule published on July 27, 2006 for the Farm and Ranchland Protection Program (FRPP). FRPP has been an important partner to our local efforts to protect farmland and support our local farmers. In our town, three farmers have worked with the town and land trust to protect over 400 acres of land using FRPP and the New York State Farmland Protection Program funds. I have applied twice before and am considering applying again in order to keep our farm in production.

I am very worried that FRPP policies proposed in the Interim Final Rule conflict with the standards of the New York State Farmland Protection Program. This year, New York State Department of Agriculture and Markets indicated that FRPP funds would not be permitted as a match for state-funded projects - largely due to new FRPP standards. **For this reason, I did not apply to NYSDAM this year and if this conflict continues, I will not apply to either program in the future.**

Specifically I am concerned about the following issues as they are stated in the proposed rule:

- o I believe that the 2% impervious surface restriction is not the right way to protect topsoil. Farmers need good soil and will adopt management techniques that preserve topsoil. We are a customer-driven fruit farm and need to have the flexibility to add a greenhouse if that is the type of product our customers are looking for. The other easements in town require a conservation plan for the highly erodible soils, why wouldn't this work for the whole farm? This seems to be a more reasonable way to manage topsoil without capping management practices with rigid limitation in an easement.
- o I also believe that changing the FRPP to a block grant-type program for well-organized state or local programs would be a more effective way to partner with local governments.

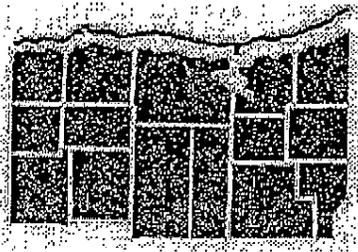
My wife and I enjoy the farming lifestyle and are confident that we will continue to do so. I believe we will adopt new management techniques in the future. It is vitally important that any farmland protection easement allow this to happen. It is also important that the State and Federal programs work together.

I hope you will consider these concerns and make appropriate changes in order that more farmers, myself included, can utilize your program.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Capp". The signature is fluid and cursive, with a large initial "G" and a long, sweeping underline.

CC: U.S. Senator Hillary Clinton
U.S. Senator Charles Schumer
U.S. Congressman James Walsh
- - - Ron Alvarado, NRCS-NY State Conservationist
Marilyn Stephenson, NRCS-NY FRPP Program Manager
Patrick Brennan, Commissioner NYSDAM
David Haight, American Farmland Trust



Wayne County Planning Department
9 PEARL STREET • LYONS, NY 14489
PHONE: (315) 946-5919 • FAX: (315) 946-7657
EMAIL: orothfuss@co.wayne.ny.us

Fax Transmittal

To: Easement Program Division

Fax: 202 720 9689

From: Ora Rothfuss III, Ag Development

Date: 9-28-06

Re: FRPP Comment.

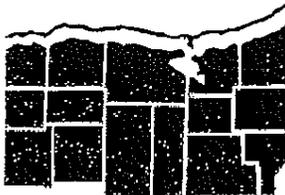
Pages: 4 with cover

CC: _____

- Urgent
- For Review
- Please Reply
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- Hardcopy to follow

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Wayne County Planning Department

To: Easement Program Division

From: Ora Rothfuss, Ag Development Specialist

A handwritten signature in black ink, appearing to read 'Ora Rothfuss', is written over the 'From:' line.

Date: 9/28/2006

Re: USDA NRCS comment letter

Please find enclosed a letter from Gary Craft offering comments on the Interim Final Rule for the Farm and Ranch Lands Protection Program (FRPP) published in the Federal Register on July 27, 2006 by the Commodity Credit Corporation. While this letter was submitted too late for comment on the proposed rule, it does bring up good points for the 2007 Farm Bill discussions.

Please contact me if you have questions or concerns.