

Decker, Denise - Washington, DC

From: Elisabeth Moore [emoore@ctfarmland.org]
Sent: Tuesday, March 17, 2009 4:28 PM
To: RA.dcwashing2.frpp
Subject: Comments re. Docket #NRCS-IFR-08006

233

Below are comments from the Connecticut Farmland Trust concerning the Farm and Ranch Lands Protection Program Interim Final Rule (Docket Number NRCS-IFR-08006) as published on January 16, 2009. Thank you for this opportunity to provide you with our thoughts on this important program.

Our primary concern is that the Farm and Ranch Lands Protection Program has become increasingly burdensome and unworkable. We strongly encourage the USDA to address the following issues to improve the program's flexibility for us and other partners.

- 1) Develop a meaningful certification process to reduce unnecessary administrative review for experienced entities. Connecticut Farmland Trust has received FRPP funding each year since 2004 and we have a proven history of success. Certification would streamline the process for experienced entities like us, saving us and NRCS limited resources.
- 2) Clarify that that the federal government is not purchasing a federal property interest, but the right to enforce the terms of an easement, if necessary.
- 3) Eliminate or significantly revise the new requirement for a forest management plan. This requirement is not authorized in the statute and would be a significant burden. At this time of significant state budget deficits, it is hard to imagine how states will find the resources to assist the number of landowners who will need to develop forest management plans in the short time between application to the program and closing.
- 4) Follow Congressional intent and give program partners the flexibility to design and implement their own impervious surface standards. One standard does not fit all -- farms in New England are considerably smaller than those in other parts of the country and may need a higher percentage of impervious surface. Allow partners to determine what is appropriate for the farms, landscapes, and local farming practices that they know.
- 5) Allow entities that become certified to use their own ranking criteria for selecting farmland protection projects. The new national ranking criteria do not adequately recognize state and local farmland protection goals.

--

Elisabeth Moore
Director of Conservation
Connecticut Farmland Trust
77 Buckingham Street
Hartford, CT 06106
(860) 247-0202
<http://www.CTFarmland.org>
emoore@CTFarmland.org