

**Decker, Denise - Washington, DC**

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**From:** LisaWelch@ongov.net  
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**Subject:** Docket Number NRCS-IFR-08006

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Docket Number NRCS-IFR-08006.

The Purchase of Development Rights on agricultural properties has been an important part of farmland protection in Onondaga County and the Syracuse Metropolitan Area.

Unfortunately, New York State farmers have been unable to utilize the Federal Farm and Ranchlands Protection Program (FFRP) in concert with New York State's Farmland Protection Implementation Program (FPIG), because of inflexible USDA impervious surface standards.

The USDA, therefore, must address the following five issues to improve the program's flexibility for state and local partners:

- Make it clear that the federal government is not purchasing a federal property interest, but rather the right to enforce the terms of an easement when and if necessary;
- USDA should establish a meaningful certification process to reduce cumbersome and unneeded program requirements for experienced entities;
- While well-intentioned, the new forest management plan requirement is burdensome and should be eliminated or significantly revised;
- The rule should follow Congressional intent and give program partners the flexibility to design and implement their own impervious surfaces standards; and,
- The new national ranking criteria do not adequately recognize state and local farmland protection goals; entities that become certified should be allowed to use their own criteria for ranking farmland protection projects.

Thank you for your time.

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