

Decker, Denise - Washington, DC

From: Susan Caughlan [sgc@dca.net]
Sent: Friday, March 13, 2009 2:59 PM
To: RA.dcwashing2.frpp
Subject: Docket Number NRCS-IFR-08006

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Dear Mr. Secretary,

I am an attorney who represents landowners wishing to place a conservation easement on their land. I was very pleased with the changes that Congress made last year to the Farm and Ranch Lands Protection Program to allow for greater flexibility by program partners at the state and local level. However, this flexibility was essentially ignored in the Interim Final Rule released by the Department last month.

I would like to submit the following comments on the Interim Rule:

- The Rule should make it clear that the federal government is not purchasing an interest in land, only a contingent right of enforcement. Federal purchases of an interest in land are extremely cumbersome and expensive for both the landowner and the land trust.
- The Rule should allow land trusts that have become certified to use their own state and local criteria for ranking farmland protection projects. The difference in criteria when federal funding is included in a project is confusing to landowners and the public and does not advance the state and local preservation goals that are supported by the local funding sources.

Thank you for your consideration of my concerns.

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