

Decker, Denise - Washington, DC

From: Phil Johnston [pwjohn@ucsc.edu]
Sent: Friday, March 13, 2009 2:08 PM
To: RA.dcwashing2.frpp
Subject: Docket Number NRCS-IFR-08006

261

Re: Docket Number NRCS-IFR-08006.

To whom it may concern:

I believe USDA must address the following five issues to improve the program's flexibility and effectiveness for state and local partners and to reflect Congressional intent:

- 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.

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