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# Farm and Ranch Lands Protection Program

Teleconference with Northeastern State Departments of Agriculture - August 7, 2006

Summary of Comments Relevant to the Interim Final Rule

#### Comment #17 – New Jersey

Comment on Program in General – NRCS must recognize the differences in FRPP and the state programs

Comment on Indemnification Requirement – Indemnification should not be required

#### Comment #18 – Connecticut

Comment on Indemnification Requirement – Indemnification should not be required. The liability of the U.S. government is not as much as the Office of General Counsel believes.

## Comment #19 – Maryland

Comment on Appraisal Requirements – The requirements will add to the time required to close

### Comment #20 - Massachusetts

Comment on Indemnification Requirement – Indemnification should not be required

## Comment #21 – New York

Comment on Program in General – The program has too much emphasis on topsil and not enough emphasis on farm viability. There is not enough flexibility to compromise between FRPP and the state programs

Comment on Appraisal Requirements – The requirements will add cost to program administration

Comment on Indemnification Requirement – The requirement will add cost to program administration

Comment on Impervious Surface Requirement – The requirement is too restrictive to allow farms to grow

Comment on Title Review Requirement – The requirement will add cost to program administration.

Comment on Flexibility on Forested Acreage – They were concerned that too much funding would be spent on forested areas.