

FRPP - IFR - HAAK

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Received 9/20/06  
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September 9, 2006

Mr. Stephen Haak  
6730 Furnace Road  
Ontario, NY 14519

Robert Glennon, Farm and Ranch Lands Protection Program Manager  
Easement Program Division  
USDA Natural Resource Conservation Service (NRCS)  
1400 Independence Ave, SW Rm 6819-S  
Washington, DC 20250-1400

Dear Mr. Glennon:

I am writing in response to the Interim Final Rule published on July 27, 2006 for the Farm and Ranchland Protection Program (FRPP). FRPP has been an important partner to our local efforts to protect farmland and support our local farmers.

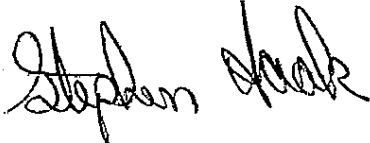
I am very worried that FRPP policies proposed in the Interim Final Rule conflict with the standards of the New York State Farmland Protection Program. This year, New York State Department of Agriculture and Markets ruled that FRPP funds would not be allowed as a match for state-funded projects - largely due to new FRPP standards. If this conflict continues I will in all likelihood not apply to either program. As a new and part-time farmer, I do not have the equity available to donate to the town in order to achieve state and federal government farmland protection goals.

Specifically I am concerned about the following issue:

- I believe that the 2% impervious surface restriction is not the right way to protect topsoil. Farmers need good soil and will adopt management techniques that preserve topsoil. If this issue keeps the New York program and the FRPP from working together, something needs to change. I would hope there is some middle ground that would allow the two programs to complete a project together. I do know that land that isn't farmed grows houses and trees pretty quickly, both of which make it difficult to put back into production. Farm managers need to be able to change with new technologies and management practices. A farmland protection easement should allow these new technologies as long as the intent of the easement is being met.

I am happy that our Town has started developing a farmland protection program. I am interested in participating in the future, but I believe both the State and Federal programs will need to be involved with the funding of the project in order to do so. I hope you will consider these concerns and make appropriate changes in order that more farmers, myself included, can utilize your program.

Sincerely,



CC: U.S. Senator Hillary Clinton  
U.S. Senator Charles Schumer  
U.S. Congressman James Walsh  
Ron Alvarado, NRCS-NY State Conservationist  
Marilyn Stephenson, NRCS-NY FRPP Program Manager  
Patrick Brennan, Commissioner NYSDAM  
David Haight, American Farmland Trust