

38

FFPP-IFR-RIFB

Received 9/25/06

RFJ



Rhode Island Farm Bureau

2227 Plainfield Pike Rear, Johnston, RI 02819 • 401-647-3570 FAX: 401-647-0410 • EMAIL: rifarm@aol.com WEBSITE: rifb.fb.org

To: USDA

From: Alfred R. Bettencourt, Jr
Director

September 24, 2006

Subject: Rule on Conservation Easements in FFPP

While RI Farm Bureau applauds the NRCS for changing rules on impervious surfaces in the Farm and Ranch Lands Protection Program (FFPP) we do not think the agency has gone far enough. There are many small farms in the Northeast that can benefit from the FFPP program. We have farms in major cities in RI such as Warwick, Cranston, East Providence and Woonsocket. Even our capital city of Providence has a farm (Southside Community Land Trust's City Farm). It is these "urban" farms that we are concerned with. Some of them are smaller than 10 acres and with the trend toward growing more and more vegetables and other plants in greenhouses, both the old and proposed impervious surface rule would eliminate many small urban farmers. In fact, a board member of the RI Farm Bureau constantly reminds us that he makes a full time living on less than two acres all of which is under glass.

RI Farm Bureau proposes that the NRCS State Conservationist be given wide latitude in waiving the 2% rule on farms. Specifically, we believe farms should be allowed to have as many greenhouses as they desire. While the purpose of the FFPP is to protect topsoil the ultimate purpose of saving the soil is to allow us to preserve prime farmland for the future to raise food and fiber. Greenhouses serve this purpose. In fact, greenhouses can produce more food and fiber in the Northeast because they can produce food all year. It is this fact that allows many farms that have marginal or low profits to become more viable farms by using greenhouses. Thus, restricting the use of greenhouses on FFPP land is actually contrary to the ultimate purpose of the program. Thus, we recommend that the State Conservationist may waive the two percent impervious surface limitation on a parcel-by-parcel basis, provided no more than 6% of the easement area is covered by non-agricultural impervious surfaces but up to 40% if the area is to be covered by greenhouses.

Thank you for your consideration on this matter.

RECEIVED
SEP 25 2006
USDA