

PUBLIC SUBMISSION

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Farm and Ranch Lands Protection Program

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Submitter Information

Name: E. E. Mills
Address:
 500 East Avenue
 Rochester, NY, 14607
Email: gmills@geneseelandtrust.org
Phone: 585-256-2130
Fax: 585-271-4292
Organization: Genesee Land Trust

General Comment

Genesee Land Trust works with individual landowners interested in participating in municipal farmland protection programs in Wayne County, NY. It has been our impression that the previous FRPP rules and their differences from the NY State program were discouraging and confusing to farmers who were considering protecting their farms. The proposed changes have brought the FRPP in closer alignment with NY State's protection program, whose mission embraces the continued agricultural viability of land protected through their programs in addition to protection of natural resources.

There are still a number of issues that are of concern to us including 1) the policies regarding percentage of impervious surface, 2) regulations requiring forest management plans for small woodlots, and 3) definition of agriculture.

Since the New York State farmland protection program provides the majority of the funding for most of the projects on which we work, we would recommend that the FRPP work with State programs to define statewide standards for impervious surface restrictions as well a statewide definition of agriculture. We also believe the minimum woodlot size that requires a management

plans should be at least fifty-acres

Thank you for your consideration.