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Pennsylvania Executive Directo

Mr. Lyle Forer, Director Bureau of Plant Industry Department of Agriculture Harrisburg, PA 17110-9408

April 16, 1999

Dear Mr. Forer:

INDEPENDENT FEGULATORY REVIEW COMMISSION

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The Chesapeake Bay Foundation has reviewed the Department's Proposed Rulemaking for the Sustainable Agriculture Program. We commend the Department for addressing this very important component of agriculture, which impacts producers and the general public. We view sustainable agriculture as a viable means to support independent producers and to promote environmental stewardship. However, we do have a specific concern referencing the proposed rulemaking.

The Sustainable Agriculture Program should and must have adequate funding to be successful. Producers who are willing to try diversified, progressive methods to practice environmentally sound agriculture can not afford loans. If they are willing to try practices, which will promote improved land use and water quality, in addition to opportunities for future generations, they should be encouraged and fully funded with a stable, reliable grant program. Reliance on a revolving fund makes monies uncertain from year to year and indicates a lack of commitment by the Department.

"A Time to Act," a report to the United States Department of Agriculture by the National Commission on Small Farms, explored the value of small farms to our landscape, culture, tradition and rural communities. The study found that our nations' agriculture policies in the past 20 years have supported the "bigger is better" mentality, thereby diminishing the role of small farmers to contract growers or working off of the farm to survive. The Commission identified 8 major policy goals, which are essential for the survival of small farms. One of them is "Emphasize sustainable"

agriculture as a profitable, ecological and socially sound strategy for small farms."

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The Department of Agriculture should take advantage of this opportunity to demonstrate a pro-active approach to support sustainable agriculture small family farm enterprises in Pennsylvania by providing a Sustainable Agriculture Grant Program with funding. Statistics show that only 2% of the population are represented in agriculture. This is a trend that does not support healthy sustainable systems in our agricultural future. The Chesapeake Bay Foundation respectfully urges you to show your support of this important program by providing permanent grant funding.

Sincerely,

Melanie A. Wertz

Agricultural Policy Specialist

Melanie a. Westy

cc: Jolene Chinchilli