



**Farm Credit
of Southwest Florida, ACA**

00-037-2
2

Wauchula Office
1311 US Highway 17 North
Wauchula, Florida 33873
(863) 773-4108
Toll Free 1-800-307-5677

December 21, 2000

Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: 00-037-2

To Whom It May Concern:

We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker.

Sincerely,

John F. Smoak, Jr.
Director

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of Southwest Florida, ACA**

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3

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4700 River Road Unit 118
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We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker.

We also strongly recommend inclusion of wording that would make any payments jointly payable to both the grower and the lender.

Sincerely,


John Roy Gough
Director

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00-037-2
4
Farm Credit
of Southwest Florida, ACA
580 South Main St.
LaBelle, FL 33935
(941) 675-1747

December 21, 2000

Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238


RE: 00-037-2

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We also strongly recommend inclusion of wording that would make any payments jointly payable to both the grower and the lender.

Sincerely,


Mark Wheeler
Director

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**Farm Credit
of Southwest Florida, ACA**

00-037-2
6
Administrative Office
330 North Brevard Avenue
Arcadia, Florida 34266
(941) 494-0500
Toll Free 1-800-307-5677

December 21, 2000

Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238

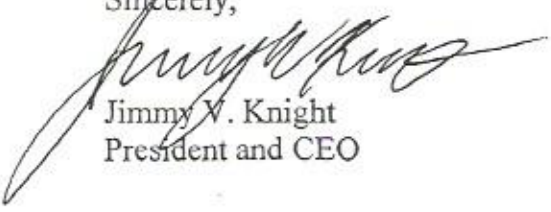
RE: 00-037-2

To Whom It May Concern:

On behalf of the stockholders of Farm Credit of Southwest Florida, we strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker.

We I also strongly recommend inclusion of wording that would make any payments jointly payable to both the grower and the lender.

Sincerely,



Jimmy V. Knight
President and CEO

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JAN 02 2001



**Farm Credit
of Southwest Florida, ACA**

Administrative Office
330 North Brevard Avenue
Arcadia, Florida 34266
(941) 494-0500
Toll Free 1-800-307-5677

December 21, 2000

Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: 00-037-2

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We also strongly recommend inclusion of wording that would make any payments jointly payable to both the grower and the lender.

Sincerely,

A handwritten signature in black ink, appearing to read "W. G. Welles, IV", is written over a horizontal line.

W. G. "Kayo" Welles, IV
Chairman of the Board

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**Farm Credit
of Southwest Florida, ACA**

Administrative Office
330 North Brevard Avenue
Arcadia, Florida 34266
(941) 494-0500
Toll Free 1-800-307-5677

December 21, 2000

Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: 00-037-2

To Whom It May Concern:

We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker.

Sincerely,

Calvin C. Boggess
Director

A handwritten signature in cursive script that reads "Calvin C. Boggess".

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December 26, 2000

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Docket No. 00-037-2

I support changes in lime compensation as requested by Brooks Tropicals.

I lost my entire commercial lime grove due to its proximity to one, infected backyard tree. The grove is my sole source of income. Anything you could do to help would be appreciated.

Sincerely,

Patricia Anthony Whaley

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JAN 05 2001

January 2, 2001

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 00-037-2

To Whom It May Concern:

"January 2000: In another South Florida development, state agriculture inspectors learn that eight lime trees in South Florida have been infected with citrus canker. As National Guard troops and tanks pour into the area, a state official states, 'We are not ruling out napalm strikes.'

February: State agriculture officials score an important victory in the War on Citrus Canker when they manage to kill two of the eight suspected lime trees with a four-hour barrage of artillery fire. Unfortunately, they also - "you can't make an omelet without breaking eggs." notes one state official - obliterate 237 homes. During the battle, the six other infected lime trees, ...are able to escape, setting off a statewide manhunt."

Dave Barry's Yearbook, *Miami Herald*, December 2000
Dave Barry, Pulitzer Prize Winner

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Wauchula Office
1311 US Highway 17 North
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(863) 773-4108
Toll Free 1-800-307-5677

December 21, 2000

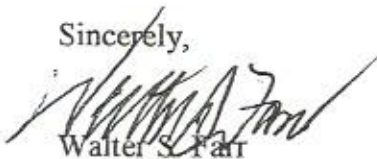
Docket No. 00-037-2
Regulatory Analysis and Development,
PPD, APHIS, Suite 3C03,
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: 00-037-2

To Whom It May Concern:

We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker.

Sincerely,



Walter S. Fair
Director

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DEC 26 2000

December 28, 2000

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern:

My lime grove had just entered its peak production year when it was pushed and burned by the Citrus Canker Eradication Program. The costs involved in cultivating a healthy lime grove are immense in the first five to six years before reaching peak production levels. I was just realizing the potential of this grove when I was notified that it was going to be destroyed.

I would very much like to continue using my property in an agricultural sense, but the costs involved in replanting will outweigh any income I might make over the next five or six years. Any monies I receive from the compensation program will be used to offset replanting and maintenance expenses.

It comes to my attention though, that incomplete price and production figures were used to come to the current compensation amount. I support review and reconstruction of the compensation program to include any data that was not accounted for.

Sincerely,


Uve Miegel

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Dec 28, 2000

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19

SOA-APHIS

Regulatory Analysis & Development

Suite 3003

1700 River Rd Unit 118

Purcellville MD 20137-1238

To whom it may concern:

I am a Secretary at an agricultural company and my job security has been threatened due to citrus canker. Many of the lime groves that my firm manages have been destroyed by the eradication program.

It is my understanding that incomplete figures were used to compute the compensation amount. I support the use of correct figures to ensure that the grove owners receive adequate funds to replant their groves.

Sincerely,
Vera Philips

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JAN 05 2001

17295 S.W. 292 Street
Homestead, FL 33030
December 29, 2000

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Canker Compensation

To Whom It May Concern:

I support the use of full and complete lime price data to accurately calculate compensation for lime groves destroyed due to canker.

I also support the use of non-risk adjusted discount rates to calculate lime compensation totals.

Sincerely,



Dr. Fred Vihlen

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P.O. Box 4061
25251 S.W. 139 Avenue
Princeton, FL 33032



Telephone
305-258-1611
Fla. Watts
1-800-423-3503
National
1-800-843-3508

GROWER — PACKER — SHIPPER
FAX # 258-0710

January 2, 2001

USDA — APHIS
Regulatory Analysis and Development, PPD / APHIS
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Citrus Canker Disaster Assistance Appropriation

Dear Sirs,

I have been a resident of Homestead, FL for 20 years, in which time I have seen many changes in the area. The most significant change has been the loss of farmland. Every year another field becomes a home or a shopping center.

Growing up in this community, I have come to know many farmers and their families whose livelihood depends on farming. These people have had to deal with floods freezes and over population, all which are inevitable problems farmers must face and overcome. However they do need help, like everybody else who has been devastated by human error or natural disasters.

Being a salesman for Limeco Inc., I have seen the devastation caused by human error. The destruction of so many lime groves due to canker could have and should have been avoided. It is my opinion that it was the failure of USDA and The Department of Agriculture to act quickly when canker was first discovered in 1995, which allowed canker to spread.

It has been brought to my attention that USDA bureaucrats have decided that \$8,880.00 per acre was adequate compensation for replacement of trees and the economic loss of destroyed groves. It is my opinion that it is necessary to reevaluate the studies prepared by the University of Florida TREC and the Cooperative Extension service. I urge you to reconsider the economic loss and compensate the farmers so accordingly.

Thank you for your attention to this matter.


James D. Shivers

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JAN 05 2001

P.O. Box 924061
25251 S.W. 139 Avenue
Princeton, FL 33092



Telephone
305-258-1611
National Toll-Free
1-800-843-3508
Fax
305-258-0710

GROWER — ~~PACKER~~ — SHIPPER

January 3, 2001

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 River Road, Unit 18
Riverdale, MD 20737-1238

Re: Citrus Canker Disaster Assistance Appropriation

To Whom It May Concern:

I wanted to take a moment to write this letter. For the last several months I have been working for a grower and packing house. I have never known the devastation that Citrus Canker could cause to the Lime Industry until I started working here.

I can see how difficult it is for the growers to lose all their lime trees and in some cases other healthy trees which are set to be destroyed because they are in the Citrus Canker eradication buffer zone.

It is heart breaking when you see the sadness of the person you work for and you know how hard they have worked all their life to have a successful business be destroyed by a disease we have no control over.

It is imperative that the \$8,800 per acre be re-evaluated and adequate funds be compensated for raising the trees and economic loss of the groves destroyed.

Thank you for your help.

Sincerely,

A handwritten signature in cursive script that reads "Carrie Vance".

Carrie Vance

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LIMES — ~~MANGOES~~ — MANGOS — ~~TROPICAL FRUITS~~

00-037-2
11



TROPICAL FRUIT GROWERS OF SOUTH FLORIDA, INC.

18710 S. W. 288 Street, Homestead, Florida 33030
Telephone: 305-248-3311 Fax 305-246-2932
Visit us at our Web Site: www.fl-ag.com/tropical

December 27, 2000

USDA-APHIS
Regulatory Analysis and Development, PPD/APHIS
Suite 3C03
4700 river Road, Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern;

On behalf of the Tropical Fruit Growers of South Florida (TFGSF), I would like to add our support to the efforts made by Mr. Craig Wheeling of Brooks Tropicals. Mr. Wheeling is requesting that more funding be allocated to assist the lime growers for their crop production loss due to citrus canker.

The TFGSF represents over 120 tropical fruit growers in south Florida who grow a variety of tropical fruit crops, in addition to limes and other citrus. Citrus canker has affected our livelihood far greater than we had imagined, and the growers need all the assistance that they can receive for this unfortunate situation.

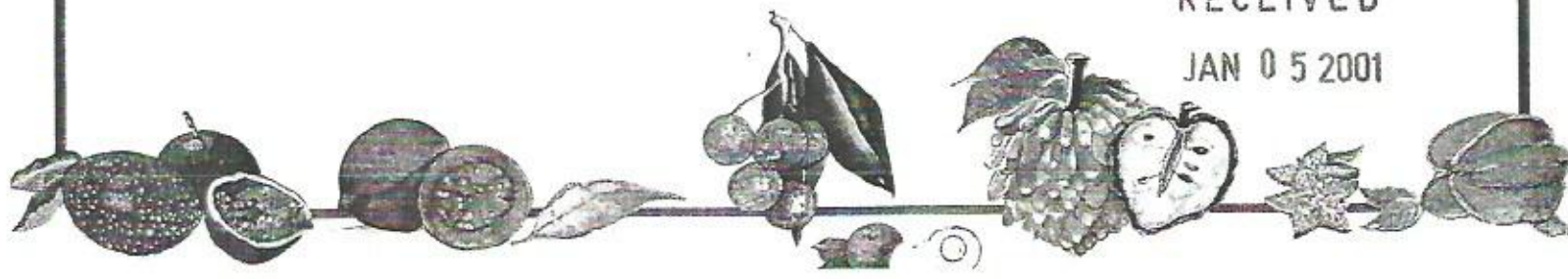
Thank you for your attention to this matter.

Sincerely,

Colleen Griffin

Colleen Griffin,
President, TFGSF

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00-037
12
December 27, 2000

To Whom It May Concern:

I have worked for Acosta Farms for almost twenty years. I started as a laborer and am now a foreman of the grove maintenance. They have been very honest with all of us about our uncertain future in lime farming. We know without the governments help, we will be out of work. It is very tough in this area to find work in farming. Every year another farmer closes his doors because of bad prices at the market. We had healthy trees and they said they had to be cut. I have relatives in Mexico who work in the citrus industry and know that they do not chop down all the trees around the infected one. Why do we have to do that here?

Please help us keep our homes and families fed by helping our employer. With your help he can replant other crops and we can keep our jobs.

Sincerely,

Alberto Dana

Alberto Dana
Supervisor
Acosta Farms, Inc.

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December 27, 2000

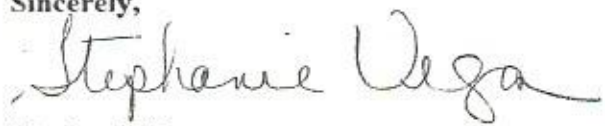
USDA - APHIS
Regulatory Analysis and Development, PPD / APHIS
Suite 3Co3
4700 River Road, Unit #118
Riverdale, MD 20737-1238

To Whom It May Concern:

I am an employee of Acosta Farms, one of the growers who have been severely affected by the citrus canker situation. I have personally witnessed the mental and financial burden the canker crises have caused my employer.

I urge you to look at the information provided by Brooks Tropicals. If the lime growers do not receive proper compensation, I will be one of the people who have worked in the industry for fifteen year without a job. Homestead has little industry and opportunity other than farming, please help keep it alive.

Sincerely,



Stephanie Vega
Accounting

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December 27, 2000

USDA - APHIS
Regulatory Analysis and Development, PPD / APHIS
Suite 3C03
4700 River Road, Unit #118
Riverdale, MD 20737-1238

To Whom It May Concern:

My name is Victor Acosta and my parents own Acosta Farms. We were once one of the largest lime producers in Homestead. All my life I have been involved in farming and have never held a job outside of the family business.

My family has been farming in Homestead for three decades, but, without proper compensation I fear that will come to an end. The Citrus Canker Crises has effected the farmer, laborer and the packinghouses. Our company alone has over one hundred employees. I am very concerned about their welfare as well as my own family.

I read the letter dated December 18, 2000 by Brooks Tropicals and I agree with their position on the lime compensation models. I urge you to look at their data.

Sincerely,


Victor Acosta

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Metropolitan Life Insurance Company
One Madison Avenue, New York, NY 10010-3690
Tel 212 578-5587
1620 L Street N.W., Suite 800, Washington, DC 20036
Tel 202 659-3575



Vincent P. Reusing
Senior Vice-President

January 8, 2001

Docket No. 00-037-2
Regulatory Analysis and Development, PPD, APHIS
Suite 3C03
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Comment regarding Docket No. 00-037-2 - Secured Lender Concerns

To Whom It May Concern:

Metropolitan Life Insurance Company (MetLife) appreciates the opportunity to comment on your proposed amendment to citrus canker regulations. Metropolitan Life Insurance Company, a subsidiary of MetLife, Inc. (NYSE: MET), is a leading provider of insurance and other financial services to individual and group customers. MetLife is the largest insurance company lender to American agriculture and has approximately five billion dollars invested in farm, ranch and agribusiness loans.

We understand that the amendment would establish provisions under which eligible owners of commercial citrus groves could, subject to the availability of appropriated funds, receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker. These regulations and related payments would complement your October 16, 2000, interim rule (Docket No. 00-037-1) that provides for the payment of tree replacement funds to eligible owners of commercial citrus groves and help to reduce the economic effects of the citrus canker quarantine on affected commercial citrus growers.

Agriculture lenders to these commercial citrus growers (MetLife among them) have loaned funds to these growers secured by mortgages on the citrus groves. Condemnation and insurance payments related to government takings or damage to improvements are routinely made payable jointly to the parties in interest to ensure that the loan is paid down appropriately or satisfactory repairs made. Lenders to the agricultural industry should be entitled to the same protection on payments related to the severe diminution of the value of its security by the forced removal of infected trees.

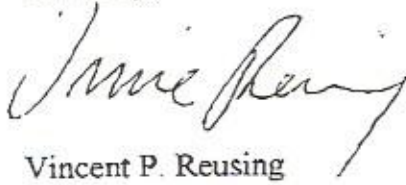
We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker. We further strongly recommend inclusion of

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provisions requiring that any payments be made jointly to both the grower and its secured lender(s), whether it relates to Docket No. 00-037-2 or Docket No. 00-037-1.

If you have any questions about our comments, please contact me at 202-659-3575.
Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vincent P. Reusing".

Vincent P. Reusing