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



GROWER - PACKER - SHIPPER

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

January 3, 2001

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

Reference: Citrus Canker Disaster Assistance Appropriation

Dear Sir or Madame:

I am the owner of LIMECO, Inc. located in Dade County, Florida. LIMECO is a grower, packer, and shipper of tropical fruits grown in the South Dade, and as the name implies, our main efforts have been directed to the production, packing and marketing of Florida limes. After complete devastation of the lime groves by Hurricane Andrew on August 24, 1992, I borrowed heavily and invested in replanting approximately 400 acres of irrigated Persian Limes. The lime groves require a long-term commitment by the growers since it take approximately seven (7) years to bring the trees into maturization.

During the first seven years, growers must bear the full cost of land, fertilizer, pesticides, weed control, irrigation and associated labor. For most growers who have replanted, the costs of maintenance alone, up to an economic breakeven point, have easily exceeded \$11,000 to \$12,000 per acre. It has been a truly long struggle to bring the lime groves to near maturity and near full production in 1998, after suffering Hurricane Andrew of 92; "the storm of the century of March 93; tropical storm Gordon of October 94; arrival of pests such as "Asian Leaf Minor" and "Brown Citrus Aphids" from offshore; and fighting damaging winter freezes. By the end of 1998, we were cautiously optimistic that proximity to U.S. East-coast markets and the quality of Florida limes would finally yield average of \$1,500 to \$2,000 per acre per year profit.

Citrus canker was originally detected in October 1995, near Miami International Airport.

In January 1999, due to the inaction and failure of both USDA and Florida Department of Agriculture to properly control this extremely contagious disease, it jumped to Florida's lime and citrus industry, resulting in forced destruction of majority of the lime groves in South Dade. This on going serious canker related destruction efforts of citrus trees in Southern Florida is to ensure survival of Florida's citrus industry to the North.

It is very difficult for growers to lose majority of lime trees and acreage after seven years of hard work and large investment to a disease we had no control over. Further, it is truly devastating to us for USDA's bureaucrats to unilaterally decide that \$8,800 per acre would be a sufficient and just compensation for both costs of raising the trees and economic loss of the destroyed groves.

I urge you to give your serious consideration to a higher per acre compensation, based on study performed and report prepared by experts from University of Florida's TREC and Cooperative Extension Service as well as comments on thorough analysis of the lime production in South Dade, prepared by Brooks Tropicals, a leading tropical fruits handler in Homestead, Florida.

Sincerely,

Herbert Yamamura

Owner/President