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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:

I am a Dade County, Florida citrus grower whose trees were destroyed by the Florida canker eradication program.

The notion that USDA should penalize lime growers by increasing a discount rate because there is less risk due to the eradication program is idiotic. The risk comes from the mismanaged State eradication program.

Examples of risk are:

- 1) I repeatedly caught State program employees coming into my grove without following proper disinfection procedures.
- 2) It took a month and a half to take out an infected lime tree in a neighboring grove. Why, if this disease is so infectious, does the State let infected trees remain alive? The answer, from the State is usually that they can't notice the owner. That's bologna. There is a grove caretaker that the State regulates that bills the owner, there is a packinghouse (one of four) that pays the owner, and somehow, the County has ownership records to bill property taxes to that owner.
- 3) Employees are poorly trained. Over a three-month period, I have had four sets of State employees insist that I did not have the proper paperwork, or boxes, for my pummelos, as if they were regulated grapefruit or oranges. All four of these disputes were resolved in my favor. But, after four times, it is obvious that the State employees did not know what they were doing.

The reason that canker has spread throughout South Florida is that the State program is run by incompetents. How does the compensation model quantify this risk?

Sincerely,



Bill Klein

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