



August 21, 2002

Ann M. Veneman
Secretary
U.S. Department of Agriculture
J.L. Whitten Building, Room 200-A
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Secretary Veneman:

An extensive set of comments have been prepared in cooperation with a broad range of Florida's agricultural interests and the office of Rep. Adam Putnam (R-FL, the only member of Florida's Congressional delegation to serve on one of the Congressional agricultural committees) for USDA to consider in its rule making for the Title II Conservation programs of P.L. 107-171, the "Farm Security and Rural Investment Act of 2002."

This effort has been underway in Florida since mid-June, and has just now been completed.

The comments can be viewed at http://privatelands.org/usda_comments.htm. They also are provided for your consideration as an attachment to this letter.

The value in these comments is that:

1. they are very specific and extensive, and
2. they represent a consensus among a broad range of agriculture interests.

In several cases, the consensus was hard won. Every producer, organization and agency brought their own views and issues to the table -- and in several cases they initially did not see eye to eye. The wording for one proposed definition, for example, took almost 5 weeks to resolve.

These groups have worked together cooperatively in the past, so getting them to work together again on an issue in which there is a shared interest was not difficult.

Sixty individuals, representing major ag producers in the state, all major ag organizations, and the agencies that will be working with the farm bill programs, were asked for comments on the farm bill's conservation programs.

A working group of 12 individuals, that was then broken down into subgroups on different issues, participated in the development and fine tuning of the comments that are being transmitted to USDA.



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The comments represent a statewide view on how farm bill programs should be applied to agricultural operations that:

- do not always fit the standard USDA definitions and criteria for program eligibility,
- often operate under conditions very different from ag operations in other parts of the country (especially the states dominated by grain, corn and soybean production),
- are dominated by livestock and specialty crop production, and
- epitomize the need for more flexibility in USDA conservation programs so these programs will meet a broader range of producer needs and unique local conditions.

Many individual groups and agencies in Florida already have provided comments to USDA for consideration. Many of these groups and agencies will continue to provide comments as farm bill rule making continues, and still hold individual points of view on some issues. This effort, however, is not duplicative. Its value is in the consensus view that was reached on the comments that are being transmitted with this letter, which participants in the effort hope can be of use to USDA in resolving differences among the divergent views that have been presented to USDA from interests all across the U.S.

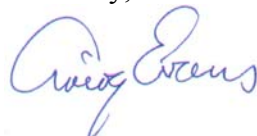
We recognize that USDA has a very difficult task -- writing rules for programs that must work equally well in Hawaii, California, the Dakotas, Oklahoma, Arkansas and Maine. Moreover, the rule making must be done in a short period of time, with staff that has other duties to perform.

Our goal is to ensure the rule making process will foster, not frustrate producer participation because of regional differences, and will accommodate and adapt to unique local conditions, not turn them into obstacles.

We hope the comments that have been provided by Florida ag interests, working cooperatively to reach consensus, will resonate with producers in other specialty crop (and, yes, even in commodity crop) states, and be of value to USDA in its rule making efforts.

We hope you will give these comments your full consideration and will share them with the individuals who have direct responsibility for preparing the rules for each section of the farm bill that is affected by these comments.

Sincerely,



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CE/lt
Enclosure

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Thomas Hunt Shipman, Deputy Undersecretary for Farm and Foreign Agricultural Services
Mark E. Rey, Undersecretary for Natural Resources and Environment
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