



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
The Capitol • Tallahassee, FL 32399-0800

November 22, 2002

Mr. James R. Little
Administrator
Farm Service Agency
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

RE: Notice of Proposed Rule – Income Limits (7 CFR 1400)

Dear Administrator Little:

Let me commend you on the speed with which the U.S. Department of Agriculture has implemented the new provisions of the 2002 Farm Bill, particularly as they relate to conservation. The State of Florida has long been a leader in conserving and protecting land to both maintain open space and preserve natural resources, spending nearly \$300 million a year for the last 12 years on land acquisitions and conservation easements. We were particularly happy to see the conservation programs expanded in the Farm Bill to make them more compatible to Florida's unique geographic conditions and look forward to partnering our state programs with USDA's programs to achieve greater environmental benefits. In fact, the recent Conservation Reserve Enhancement Program Agreement I signed with Deputy Secretary James Moseley is exactly what we envisioned.

Florida's agricultural producers have always been partners in our state efforts. We recognize that to maintain our quality of life, our agricultural producers must be allowed the option of enrolling their lands in conservation programs rather than selling to developers. While the state typically only purchases land at appraised value, as you can imagine in a high growth state such as Florida, it is not uncommon for agricultural land acquisitions to cost several hundreds of thousands of dollars, if not higher. In fact, just one parcel of agricultural land that is critical to restoring the Everglades cost nearly \$130 million. For this reason, I respectfully request that income derived from participation in a restoration or conservation program administered by either a local, state or federal agency or income derived from condemnation of land needed for an infrastructure project be included in the definition of farming, ranching and forestry activities. Without this change, many of Florida's agricultural producers who own land with enormous environmental value will be unable to participate in your programs.

Thank you for the opportunity to comment on the proposed rule. If you have any questions, please contact Leslie Palmer in my office at (850) 488-3022.

Sincerely,

CHARLES H. BRONSON
COMMISSIONER OF AGRICULTURE



Florida Agriculture and Forest Products
\$53 Billion for Florida's Economy