



December 7, 2018

Marcinda M Kester  
County Executive Director  
Polk County FSA Office  
1700 US Hwy 17S; Ste 1  
Bartow FL 33830

Dear Ms. Kester:

I am a 5<sup>th</sup> generation citrus grower with operations in Polk & Hendry County that were devastated by Hurricane Irma. Our family operates a fresh fruit packinghouse in Fort Meade, Florida, a community of 5,700 that is highly dependent on the health of the citrus industry. Our overall orange crop losses exceeded 50% and our grapefruit crop losses in Hendry County exceeded 85%.

I am very appreciative Florida citrus was included in the 2017 WHIP program. I realize the program has overwhelmed the USDA resources available in Florida and administering the program has taken longer than anticipated. I have not yet received any payments from WHIP. I am hopeful additional resources can be provided to complete the work and get relief dollars to us that are so desperately needed.

Two specific inequities exist in the program that I am hopeful can be corrected:

1. **Groves less than 5 years old excluded from WHIP.** Our 3 and 4-year-old plantings are some of our most productive acreage, consistently exceeding the county average production for mature groves. Our 3 and 4-year-old groves were planted at high densities, using the latest technologies, to achieve early yields. There are less than 50,000 acres, or 10% of the industry less than 5 years old, but this is a critical segment of our industry excluded from WHIP. **The WHIP program should be expanded to include 3 and 4-year-old groves.**
2. **\$125,000 payment cap for farmers with less than 75% net income derived from farming.** My uncle is a partner in our farm operation and receives a modest pension from his career serving in the military. His pension exceeds 25% of his net income, preventing our operation from receiving full benefits from WHIP due to direct attribution. The WHIP program for citrus should be modified to make farmers eligible for payments higher than \$125,000 if their Adjusted Gross Income is 75% derived from farming **or if their average Adjusted Gross Income is less than a threshold amount, such as the \$900,000 AGI threshold for other USDA programs.**

I appreciate your consideration. Please contact me at 863/559-0057 if I can provide additional information.

Sincerely,

Larry Black