

Specialty Crop Farm Bill Alliance

Working to Make American Agriculture Stronger

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The following comments to Docket No. AMS-FV-08-0057; FV-08-379 IFR, Notice of Request for Approval of a New Information Collection, are submitted on behalf of the Specialty Crop Farm Bill Alliance (SCFBA). The SCFBA is a diverse group of specialty crop producer organizations representing more than 120 crops in all 50 states. Members of the SCFBA were active in the legislative effort to create the block grant program for specialty crops fruit and the SCFBA was instrumental in obtaining expanded funding for this program during the 2008 Farm Bill debate. The effective administration of this program is of great importance to the SCFBA since the projects funded through these grants can provide critical support for state and local specialty crop producers.

The members of the SCFBA thank the Agricultural Marketing Service (AMS) for the sustained effort required by the agency staff to implement the SCBGP-FB by September 30, 2008.

We also thank AMS for considering our comments under the subject docket in which the agency is proposing to require states who wish to participate in the SCBGP-FB to submit, among other documents, a state plan to demonstrate how the grant funds will be used to enhance the competitiveness of specialty crops.

Under the AMS proposed requirements for the collection of new information, the state plan must:

- Document whether outreach to specialty crop was performed to specialty crop producers;
- Provide a description of the affirmative steps taken to perform the outreach;
- Describe the methods used to identify specialty crop producers and the methods used for outreach; and
- Document whether a competitive process was used to solicit and evaluate grant proposals from all interested parties.

With regard to the collection of information proposed for state plans, the SCFBA is responding to the following questions raised by AMS in the docket:

(1), “whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility” and

(3), “ways to enhance the quality, utility, and clarity of the information to be collected.”

The SCFBA subcommittee strongly agrees with the requirement to submit a state plan, and with the collection of the information proposed by AMS therein. This information is

consistent with the intent of Congress as written in the 2008 Farm Bill and as expressed in the Farm Bill Manager's report language for the SCBGP-FB. The language contained in the Farm Bill Manager's Report (included below) provides clear guidance on the importance of seeking stakeholder input through a transparent process. The goal of the SCBG-FB as envisioned by both the specialty crop industry and the Congress was to provide assistance directly to state and local specialty crop interests where those needs might be overlooked by more nationally oriented programs. Outreach to those local groups is essential to meeting that goal.

Language from Farm Bill Manager's Report:

"...regarding the provision by program applicants of a written plan detailing the affirmative steps taken to perform outreach to specialty crop producers in the development of the overall grant program, maximum public input and benefit and extensive outreach to interested parties through a transparent process of receiving and considering public comment so the grant applications are developed with proven and justified public support, particularly when developing multi state projects."

However, to ensure full compliance with the intention of the Congress and to meet AMS' goal of ensuring proper performance of the functions of the agency, *i.e.*, that funds are used to enhance the competitiveness of specialty crops and benefit the specialty crop industry and the public, we believe that transparency in the receipt and evaluation of public comments by the states must be strengthened. Specifically, in their plans, states should be required to:

- Describe the outreach conducted by the state to specialty crop stakeholders and specialty crop organizations to determine their priority needs and to solicit proposals;
- Describe how the projects funded will enhance productivity and competitiveness of specialty crop agriculture in their state;
- Describe any stakeholders and organizations that proposed and/or supported funded projects;
- For funding directed at state marketing programs, describe how states will determine funding is being used to strictly promote specialty crops as defined under the Act;
- Delineate whether approved projects received additional funding from state resources;
- Describe the criteria used by the state to evaluate the projects proposed for funding, including but not limited to how reviews were conducted and, to the extent possible, how the projects will leverage other public and private investments for maximum benefit;
- Provide a copy of the request for proposals issued in a competitive process or provide justification for not using a competitive process;
- Identify if state property is purchased with these funds; and
- Describe how states are focusing on 'multi-state' or regional projects;

The collection of this information will better enable AMS to review applications for conformance with the Farm Bill and strengthen the quality of the projects funded by the states under the program. In turn, this information will improve the specialty crop industry's ability to assist its own members in working with their State Departments of Agriculture during the block grant funding cycles to identify projects that provide specialty crop producers real opportunities to improve their competitiveness.

Sincerely,

American Mushroom Institute

America Nursery and Landscape Association

Cherry Marketing Institute

Leafy Greens Council

National Berry Crop Initiative

National Grape Cooperative Association

National Grape and Wine Initiative

National Onion Association

National Potato Council

National Watermelon Association

North American Blueberry Council

North American Bramble Growers Association

North American Strawberry Growers Association

Ocean Spray Cranberries, Inc.

Produce Marketing Association

Society of American Florists

U.S. Apple Association

United Fresh Produce Association

United Potato Growers of America

Welch's

Wine Producers Commission

WineAmerica

Winegrape Growers of America

Alabama Watermelon Association

Arizona Winegrowers Association

Blue Diamond Growers

Buy California Marketing Agreement

California Association of Nurseries & Garden Centers

California Association of Winegrape Growers

California Citrus Mutual

California Dried Plum Board

California Fig Institute

California Fresh Fig Growers Association

California Grape & Tree Fruit League

California Strawberry Commission

California Table Grape Commission

California Tree Fruit Agreement

California Walnut Commission

California-Arizona Watermelon Association

Grower-Shipper Association of Central California

Sun Maid Growers

Sunkist Growers

Western Growers

Western Pistachio Association

Wine Institute

Colorado Potato Administrative Committee

Colorado Wine Industry Development Board

Rocky Mountain Association of Vintners and Viticulturalists

Connecticut Farm Wine Development Council

Connecticut Vineyard & Winery Association

Florida Citrus Mutual

Florida Citrus Packers

Florida Fruit and Vegetable Association

Florida Strawberry Growers Association

Florida Sweet Corn Exchange

Florida Tomato Exchange

Florida Watermelon Association

Indian River Citrus League

Miami-Dade County

Peace River Valley Citrus Growers Association

Tropical Fruit Growers of South Florida

Georgia Fruit and Vegetable Growers Association

Georgia Watermelon Association

Winegrowers Association of Georgia

Idaho Grape Growers and Wine Producers Commission

Idaho Grower Shippers Association

Idaho Potato Commission

Potato Growers of Idaho

United Fresh Potato Growers of Idaho

Indiana-Illinois Watermelon Association

Northern Kentucky Vintners & Grape Growers Association

Maine Potato Board

Wild Blueberry Commission

Maryland-Delaware Watermelon Association

Maryland Wineries Association

New England Vegetable and Berry Growers

Michigan Apple Committee

WineMichigan

Minnesota Area II Potato Growers Research and Promotion Council

Minnesota Grape Growers Association

Northern Plains Potato Growers

Missouri Wine & Grape Board

Missouri-Arkansas Watermelon Association

New Mexico Wine Growers Association

Empire State Potato Growers

New York Apple Association

New York Wine & Grape Foundation

North Carolina Blueberry Council
North Carolina Grape & Wine Council
North Carolina Potato Association
North Carolina Strawberry Association
North Carolina Watermelon Association
Fruit Growers Marketing Association
Ohio Wine Producers Association
Oklahoma Grape Growers & Wine Makers Association
Oregon Potato Commission
Oregon Raspberry & Blackberry Commission
Oregon Strawberry Commission
Oregon Winegrowers Association
Peerbolt Crop Management
South Carolina Watermelon Association
Tennessee Farm Winegrowers Association
Texas Citrus Mutual
Texas Produce Association
Texas Vegetable Association
Texas Wine & Grape Growers Association
Texas-Oklahoma Watermelon Association
Virginia Apple Growers Association
Virginia Wineries Association
Northwest Horticultural Council

Washington Association of Wine Grape Growers

Washington Red Raspberry Commission

Washington Apple Commission

Washington State Potato Commission

Wyoming Grape & Wine Association