



October 30, 2024

Pamela Flores  
Office of Water Policy & Ecosystems Restoration  
Florida Department of Environmental Protection  
3900 Commonwealth Ave  
Tallahassee, FL 32399

Subject: Concerns Regarding the LSFIR MFL Draft Rule and Its Impact on Florida Agriculture

Dear Mrs. Flores,

Florida's agriculture industry has long been a cornerstone of our state's economy, culture, and communities. In North Central Florida, agriculture not only sustains countless families and businesses but also contributes to a stable food supply and the responsible stewardship of our natural resources. However, the newly proposed Draft Rule by the Florida Department of Environmental Protection poses a serious threat to this essential industry. Without thoughtful amendments, this rule risks devastating consequences for farmers and the communities that depend on them.

On behalf of 2,600 members and allied supporters of Florida Peanut Federation, we write from a background of nearly 100,000 acres of peanuts grown each year in North Central Florida, the Suwannee River Valley area. Peanuts are a crop that are planted in rotations with corn, cotton, rye, melons, sorghum, oats, bahia, cabbage, iron clay peas, soy beans, carrots, green beans, millet, potatoes, sweet potatoes, other vegetables, and pastureland. Therefore, FPF represents farmers that are very diverse and have both large and small operations.

Regarding the Lower Santa Fe and Ichetucknee River (LSFIR) Minimum Flows and Levels (MFLs) Draft Rule, the Florida Peanut Federation stands united with farmers and stakeholders across the state in

asking for a balanced approach that prioritizes both environmental preservation and agricultural viability. Key concerns addressed in this letter include:

- Risk to Farming Operations and Local Economies: The rule could force countless farms out of operation, severely reducing Florida's food production capacity and destabilizing local economies reliant on agriculture. Florida's second largest industry, agriculture is the state's leading economic driver during economic downturns. Accounting for \$16.81 billion in Gross Regional Product, there are 250,000 direct jobs and over half a million related jobs to this industry.
- Recognition of Existing Conservation Efforts: Farmers are already leaders in conservation, consistently implementing best practices that support sustainable water use and environmental stewardship.
- The compliance options outlined in the Draft Rule are impractical. A percentage of 31.5 water use reduction would significantly impact crop yields and therefore income of ag operations. Retiring water use permits is financially unfeasible, potentially reducing land value by nearly half. Participating in regional offset projects is unclear and holds potentially significant costs. The region's sandy soil and high recharge rates make small scale alternative water supply projects difficult to implement.
- Broader Impact on the Agricultural Industry and Related Businesses: This rule threatens not only farmers but also the entire network of businesses that rely on agriculture, from equipment suppliers to local banks, food processors, and retailers.

We urge the Florida Department of Environmental Protection to collaborate with the Florida Department of Agriculture and Consumer Services, as well as other key stakeholders, to develop an amended rule that achieves water sustainability without sacrificing Florida's agricultural backbone.

The rural way of life in North Central Florida is built on generations of family farming, where neighbors know each other, local businesses thrive on agricultural trade, and the land itself holds deep cultural and historical significance. However, with Florida's rapid population growth and influx of new residents, there is a very real threat that, if farms are forced out of business due to restrictive water regulations, this cherished farmland will be sold to developers for housing and commercial use. Once converted, this land is permanently lost to agriculture, along with the green space, wildlife habitat, and natural beauty it provides. The disappearance of farms would irrevocably alter the landscape, transforming rural communities into sprawling developments, removing a critical food source, and erasing a piece of Florida's heritage.

Across the 184,720 acres reviewed in our audit of 934 tracts, it is clear that a significant portion of this land would likely be sold if the Draft Rule goes into effect. When farms are no longer able to sustain themselves, families are forced to make difficult decisions, often leaving behind land that has been worked for generations. The likely sale of these acres to developers would mean not only the loss of agricultural production but also the erosion of rural character, local food sources, and economic stability for entire communities. Once this farmland is lost to development, there is no going back.

Upon request, Suwannee River Water Management District provided sensitivity spreadsheets, which proved invaluable. We appreciate the detailed information, particularly the 'Base Condition Water Use' column titled "AVG2014to2018\_mgd" and the 'Sensitivity Impact to the Gauge' column titled "CFS\_1418."

The first Excel workbook, titled \*IRHwy27\*, included data for 5,192 permits. Similarly, the second workbook, \*US441\*, also contained 5,192 permits, of which 3,369 were designated as agricultural (AG) use. Among the total permits, 2,472 are located within the 14 counties that make up the North Florida Regional Water Supply Partnership (NFRWSP) area.

Florida Peanut Federation (FPF) leadership and administration carefully reviewed the permits and relevant data associated with both the Ichetucknee River Highway 27 and Santa Fe River Highway 441 gauges. We found that most permits have an impact on both gauges. In our review, 2,301 of the permits were classified as agricultural use, which is our primary focus. Our priority remains ensuring a viable and sustainable agricultural industry in North Central Florida.

Farmers and FPF administration reviewed permit data using the Suwannee River Water Management District's 'ePermit' search tool, allowing us to gather some relevant information. However, we feel compelled to report that the permit search tool presented inconsistencies between which information is included with permit overviews and the available documents for each permit. Due to the limited and inconsistent information, we were only able to thoroughly review 934 records, despite the potential implications of the Draft Rule. Even with this limited sample, our audit clearly demonstrated the drastic reduction in water use that would occur before any offset measures are considered.

Within 1.1 Definitions; 7. Base Condition Water Use (BCWU): The Draft Rule states: "In determining the BCWU the Districts shall consider and allow adjustments if the applicant demonstrates the 2014 - 2018 average water use is not representative of normal operations. Supporting evidence of withdrawal quantities shall be provided by the applicant if withdrawals were unmetered during the BCWU time period. Where no supporting evidence is available, the Districts shall utilize the best available information to support a BCWU. Such information may include, but is not limited to, the Florida Statewide Agricultural Irrigation Demand (FSAID) database, metered monitoring, or electric usage estimates."

We understand that regulations of this magnitude must be based on accurate and reliable data. Regarding the Base Condition Water Use (BCWU), defined as 'the average quantity of groundwater in million gallons per day (mgd) from the Upper and Lower Floridian Aquifers withdrawn between 1/1/2014 and 12/31/2018,' we recognize the importance of data confirming this baseline amount. However, there are concerns among water users regarding the modeled data used in this Draft Rule, and verification is needed. The selected 2014-2018 period likely does not adequately represent current irrigation practices, given advancements in techniques and evolving water needs. Expanding the data timeframe will provide a more accurate BCWU, particularly if derived from electrical usage data monitored by power companies— data that most permittees have agreed to share with the Water Management Districts over the years.

It is our understanding that the Districts have access to this data, as farmers have routinely signed agreements for this purpose. A review of recent Suwannee River Water Management District meeting agendas includes two relevant memoranda. One, dated June 12, 2024, reported monitoring of 1,662 wells (244.22 MGD) out of a total of 1,746 active permitted wells (252.36 MGD), with farmer electric agreements in place for 877 monitoring points (156.02 MGD). An earlier memorandum, dated August 11, 2023, reported monitoring of 1,579 wells (235.0 MGD) out of 1,700 active wells (248.5 MGD), with 830 points (150.76 MGD) under farmer electric agreements. It is our understanding that the District began a program of water use monitoring for agricultural water use reporting on wells 8 inches in diameter or greater in September 2012. Given this background, we would appreciate clarity on any limitations of this data and whether it can be used to report actual water usage accurately.

Thank you for taking the time to review this overview of our audit of 934 Agricultural Water Use permit records within the NFRWSP area. At your request, we are prepared to provide the full audit details as concrete evidence of the significant impact that the proposed regulation, in its current form, would have on the region. This audit involved substantial resources and essential discussions, supported by Water Management District data, to thoroughly examine this selection of permits. The audit includes verified data on Permit Authorized MGD, CFS\_1418 impact to the gauge, AVG2014to2018 (BCWU), and acreage, all meticulously calculated to present crucial insights.

43 Permits that have BCWU mgd greater than Permitted use mgd  
(blueberry growers & tree nursery operators)

- -0- 100% Offset Required since no 2014-18 FSAID data, permit will be considered a New User
- -9- Rule Applies, greater than 0.1 CFS, full rule with timeline applies
- -14- Rule Applies, greater than 0.01 CFS, full rule applies
- -16- Offset Required, but filed plan not required, CFS includes digits within four decimal places
- -4- No Offset Required, CFS is less than 0.00009, rule does not apply

891 Permits that have Permitted use mgd greater than BCWU mgd

- -287- 100% Offset Required since no 2014-18 FSAID data, permit will be considered a New User
- -11- Rule Applies, greater than 0.1 CFS, full rule with timeline applies
- -94- Rule Applies, greater than 0.01 CFS, full rule applies
- -328- Offset Required, but filed plan not required, CFS includes digits within four decimal places
- -171- No Offset Required, CFS is less than 0.00009, rule does not apply

Of the 891 Permits that have BCWU lower than the permitted amount, **the average percent difference in mgd from Permit to BCWU is 78.06**. Minimum difference in this data set is 2.27%, maximum is 100%.

The data clearly shows that 287 permitted are losing 100% of their water use based on the Draft Rule.

495 permittees are standing to lose more than 80%.

765 permitted will lose more than 50%.

And of the 891 tracts reviewed, 865 will lose at least 25% of their permitted million of gallons per day.

As we look into a more farmer familiar number, Inches per acre per year, please see the following table for easy comparison and drastic implications.

<b>INCHES /ac /yr</b>	Permitted	BCWU	Allowable per Draft Rule
Average	21.44	4.67	3.90
Minimum	1.76	0.00	0.00
Maximum	139.32	43.28	42.43

\*Project Acreage included with dataset does not necessarily equate to Irrigated Acreage, therefore Inches per Acre per Year averages may not be accurately reflected.

The economic contributions of agriculture in the North Florida Regional Water Supply Partnership (NFRWSP) area are substantial, as demonstrated by the figures in the attached table. Each county within this region relies heavily on agricultural operations, not only as a source of revenue but as a foundation for employment and economic stability. This table illustrates the critical role that agriculture plays in sustaining local economies across several key counties.

<b>AG ECONOMICS</b>	GRP	Jobs
Hamilton County	65%	58%
Suwannee County	54%	44%
Gilchrist County	37%	40%
Columbia County	28%	28%
Alachua County	12%	22%
Bradford County	31%	32%

We believe that a phased approach, backed by verifiable historical use data, combined with reasonable conservation projects at little or no additional cost to the ag producer, would allow for sustainable progress without jeopardizing the viability of farms in North Central Florida. Without amendments, the Draft Rule will have severe, lasting impacts on North Florida's agriculture industry, causing business closures, economic decline, and disruptions across related industries. A regulation this restrictive will ultimately threaten the sustainability of agriculture in North Florida, impacting the region's culture and way of life, economy, and food supply & safety stability.

Specifically, we recommend:

- **TRANSPARENCY AND CLARITY IN USE DATA** - Basing water use benchmarks on updated data that reflects the significant advances in conservation made by farmers across the board over the last decade. Data that is direct and true, based on factual evidence of permit water use, is best. Transparency and clarity in data sources and calculations is imperative. If historic water use modeling is to be continued detailed documentation of model works, including assumptions and uncertainty, must be explained and agreed to across a variety of policy making bodies. The method for determining a water user's proportionate share of the deficit is not clearly defined in the Draft Rule; this must be addressed.
- **STAKEHOLDER ENGAGEMENT** - A structured and forthright meeting with Florida Department of Environmental Protection, Florida Department of Agriculture and Consumer Services, Suwannee River Water Management District, St. Johns Water Management District, Florida Farm Bureau, and stakeholder trade organizations like the Florida Peanut Federation. This meeting will ideally be held before the end of 2024, specifically discussing a more broad data review and formation of BCWU, offset options, such as water resource development projects, district-led projects, and the difficulties of implementing offset projects that lack clear cost estimates.
- **OFFSET PROJECT OPTIONS** - Offset options, such as water resource development projects, water use retirement, or district-led projects pose unique challenges in North Florida, particularly in areas with high recharge rates and limited alternative water sources. Farmers face difficulties in implementing these offset projects without financial support and clear cost estimates, especially in rural areas where agricultural permits are common, limiting other options.

Attached you will find documents relating the studies we have performed as they correspond to this Draft Rule.

Please find pdfs:

- Florida County GRP data
- Land Use Changes

- Problems with ongoing loss of Ag Land
- NFRWSP Economic Impact by County
- Economic Multiplier Effect

Please find excel files:

- USDA NASS Census of Agriculture
- 1001 Friends of Florida county data Ag2040\_2070

The question is simple: is Florida agriculture important?

If the answer is yes, then the current Draft Rule poses an extreme and dangerous threat. As it stands, this rule could force countless farms out of operation, cutting off a vital source of food, jobs, and economic stability in our state. Farmers are already leading in conservation, balancing resource stewardship with production. But these drastic cuts threaten not only their livelihoods but the entire network of businesses that rely on agriculture. We need a solution that protects both Florida's natural resources and the agricultural backbone of our communities.

The **Florida Peanut Federation is committed to working collaboratively** with the Florida Department of Environmental Protection, the Florida Department of Agriculture and Consumer Services, and other key stakeholders **to develop an amended rule that ensures balanced, practical water use policies.** Together, we can create a sustainable framework that protects our natural resources and ensures the viability of Florida's agriculture industry, benefiting all Floridians.

Kindest regards on behalf of all,

A handwritten signature in cursive script that reads "Laura Fowler Goss".

Laura Fowler Goss  
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County	Number of Farms (2017 USDA Census of Ag)	Ag & related Jobs	Ag & related Jobs %	Gross Regional Product	Ag's contribution to county GRP	Commodities	Data Reference
Calhoun	198	1,300		\$65,000,000	23.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Columbia	979	8,686	27.5	\$641,000,000	28.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Gilchrist	565	2,351	40.3	\$131,000,000	37.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Hamilton	338	2,618	58.2	\$254,000,000	65.1%		<a href="#">Economic Contributions of the Agriculture, N</a>
Holmes	629	2,216		\$66,000,000	20.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Jackson	942	6,236		\$795,000,000	56.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Jefferson	597	1,843		\$78,000,000	23.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Lafayette	250	740		\$64,000,000	39.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Levy	993	4,843		\$305,000,000	12.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Madison	645	2,911		\$170,000,000	38.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Suwannee	1079	7,709	43.3	\$640,000,000	54.2%	Peanuts, Corn, L	<a href="#">Economic Contributions of the Agriculture, N</a>
Walton	1611	14,184		\$844,000,000	25.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Washington	400	2,653		\$121,000,000	22.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Alachua	1611	38,894	21.8	\$1,960,000,000	12.2%	Cattle, Agronomi	<a href="#">Economic Contributions of the Agriculture, N</a>
Baker	328	2,175	22.7	\$90,000,000	14.0%		<a href="#">Economic Contributions of the Agriculture, N</a>
Bradford	490	3,181	32.2	\$206,000,000	30.7%		<a href="#">Economic Contributions of the Agriculture, N</a>
Clay	361	19,295	22.9	\$931,000,000	15.9%		<a href="#">Economic Contributions of the Agriculture, N</a>
Duval	366	120,276	17.4	\$7,690,000,000	10.8%		<a href="#">Economic Contributions of the Agriculture, N</a>
Flagler	116	11,936	28.6	\$595,000,000	23.4%		<a href="#">Economic Contributions of the Agriculture, N</a>
Nassau	373	13,072	35.7	\$1,030,000,000	36.6%		<a href="#">Economic Contributions of the Agriculture, N</a>
Putnam	564	8,433	34.9	\$770,000,000	37.7%		<a href="#">Economic Contributions of the Agriculture, N</a>
St Johns	253	32,963	26.1	\$1,840,000,000	19.1%	Potatoes	<a href="#">Economic Contributions of the Agriculture, N</a>
Union	308	902	19.4	\$33,000,000	10.8%		<a href="#">Economic Contributions of the Agriculture, N</a>



## NFRWSP ECONOMIC IMPACT BY COUNTY

Based on economic data, verified by multiple sources,, here is a ranking of the 14 counties within the North Florida Regional Water Supply Partnership according to their agricultural economic impact, from the greatest to the least:

1. **Hamilton** County: Agriculture contributes significantly to the economy, with over 58% of total employment in agriculture-related sectors and around 65% of the gross regional product coming from farming activities.
2. **Suwannee** County: Known for its extensive agricultural activities, including crop and livestock farming, Suwannee County sees a major share of its economy driven by agriculture, with a high multiplier effect due to supporting industries.
3. **Gilchrist** County: Agriculture plays a substantial role, with over 40% of the county's workforce engaged in agriculture-related activities and around 37% of its gross regional product derived from the sector.
4. **Columbia** County: This county has a strong agricultural base, with nearly 25% of employment related to farming and related industries, and a significant portion of its economic output comes from agriculture.
5. **Alachua** County: While Alachua is more urbanized compared to some of its neighboring counties, agriculture still contributes around 12% of the gross regional product, particularly through horticulture and animal production.
6. **Bradford** County: Agriculture contributes significantly to the local economy, with about 30% of the county's economic output related to farming activities.
7. **Baker** County: Agriculture contributes notably to the economy, with a sizable share of employment in farming and forestry.
8. **Union** County: While smaller in size, Union County still sees significant agricultural activity contributing to its local economy, particularly through crop farming.
9. **Putnam** County: Agriculture plays a role, though not as dominant as in the top counties, with a moderate share of the workforce engaged in farming and agricultural processing.
10. **Flagler** County: Although experiencing development pressures, agriculture, particularly in the form of nurseries and some crop production, still contributes to the local economy.
11. **Clay** County: With increasing suburban development, agriculture's share of the economy has decreased, but it still remains relevant in rural parts of the county.
12. **Nassau** County: Primarily known for other industries, agriculture contributes modestly to the local economy.

13. **St. Johns** County: While agriculture exists, the county is more dominated by tourism and other sectors due to its coastal location.
14. **Duval** County: As an urban county, agriculture's economic impact is limited compared to the more rural counties within the partnership.

These rankings are based on the proportion of economic output and employment attributed to agriculture, considering each county's unique economic profile and reliance on agricultural industries.

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## ECONOMIC MULTIPLIER EFFECT IN NORTH FLORIDA



The figure stating that for every \$1.00 generated by agriculture, an additional \$1.70 is contributed to the local economy through supporting industries is known as an economic multiplier effect. This multiplier can indeed vary from county to county based on the specific agricultural activities, regional economic conditions, and the degree of integration between agriculture and other local industries.

The multiplier effect reflects the indirect and induced economic activities that occur when agricultural income circulates within the community. For example, spending on equipment, supplies, and services stimulates local businesses, and the income earned by workers is often spent on local goods and services, further supporting the economy.

The \$1.70 figure I used in the letter is a generalized estimate often cited in economic studies for agricultural sectors in rural areas, but it can range from \$1.50 to over \$2.00 depending on factors such as:

- The diversity and scale of agricultural production in the county.
- The presence of supporting industries, such as food processing, transportation, and equipment sales.
- The local economy's reliance on agriculture compared to other sectors.

These multipliers reflect the interconnected nature of agricultural production and local economic activities, where the impact extends beyond direct sales to affect various sectors, including retail, transportation, and professional services.

The economic multipliers for agricultural industries can indeed vary by county in Florida, reflecting differences in local economic conditions, industry integration, and the role of supporting sectors. Based on UF/IFAS reports, here are the estimated multipliers for a few counties:

**Hamilton County:** In Hamilton, for every \$1 generated by agriculture, an estimated \$1.65 to \$1.75 is added to the local economy. Agriculture, including beef cattle and crop production, accounts for a significant portion of the county's economic activity, contributing around 65% to the gross regional product and supporting a substantial share of the workforce. This higher multiplier reflects the strong interdependence between farming and other local industries like feed supply, equipment sales, and local markets.

**Bradford County:** The agricultural multiplier in Bradford County is estimated at approximately \$1.60 for every \$1 of direct agricultural output. The county's economy, while diverse, still relies heavily on agriculture, including timber, livestock, and crops such as hay and peanuts. The multiplier indicates the additional economic activity generated through local purchases and services that support farming operations, contributing to the overall economic vitality of the area.

**Alachua County:** For every \$1 generated by agriculture and related activities, an estimated \$1.50 to \$1.60 is added to the local economy through supporting industries. Agriculture, along with natural resources and food industries, contributes significantly to the county's economy, generating nearly 39,000 jobs and approximately \$1.96 billion in gross regional product as of the latest economic analysis.

**Columbia County:** The agricultural economic multiplier here is approximately \$1.70 for every \$1 generated in direct agricultural sales. This reflects the county's strong dependence on agriculture, where the industry

supports a substantial portion of the local workforce and contributes significantly to the gross regional product. The multiplier effect accounts for the widespread economic activities tied to agriculture, such as equipment sales and local services.

**Suwannee** County: This rural county has one of the higher multipliers in the region, estimated at about \$1.80 to \$1.90 for every \$1 generated by agriculture. Suwannee's local economy heavily relies on agricultural production, which is a key economic driver and supports various ancillary businesses. The agricultural sector's significance is evident in its contributions to both employment and economic output in the county.

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