

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

Subject: Lower Santa Fe and Ichetucknee River MFL Regulatory Strategy Public Comment

Dear Ms. Flores,

The Florida Fruit and Vegetable Association (FFVA) appreciates the opportunity to provide the following comments and suggestions concerning the Lower Santa Fe and Ichetucknee River (LSFIR) Minimum Flows and Levels (MFL) Regulatory Strategy. FFVA is an agricultural organization whose grower-shipper membership represents the vast majority of fruit, vegetable and other specialty crop production in Florida. Members of FFVA will be directly impacted by the actions taken by the Florida Department of Environmental Protection (FDEP) and the Suwannee River Water Management District (SRWMD).

Maintaining and enhancing the competitiveness for Florida's growers in the Lower Santa Fe and Ichetucknee River Basin is a longstanding priority for FFVA and is vital for the sustainability of specialty crop production in this area. Our members recognize the value of using our natural resources sustainably and responsibly. Among the many challenges agricultural producers face is access to reliable, high-quality freshwater in quantities adequate for their operational needs. We urge your consideration of the following concerns and recommendations regarding these regulatory strategies.

The current strategy proposes reducing agricultural withdrawals by approximately 30% using a base condition water use derived from 2014-2018 Florida Statewide Agricultural Irrigation Demand (FSAID) averaged data for existing water use permits. While a data-driven approach is critical to this endeavor, this timeframe does not accurately reflect the realities of today's agricultural water requirements. Within the past decade, significant changes have occurred in Florida's climate, environment, and agriculture operational practices. Irrigation techniques have evolved, and many growers have implemented more efficient methods. The outdated information used in this model is leading to proposed reductions that may require far greater reductions than 30% for some operations. A member of our association estimates the proposed water allocation reduction requirement could be as much as 90% on their farm alone. **We ask that the District and Department expand the data review period to better represent**

agriculture's current needs and practices. We also request a meeting with FDEP, FDACS, and the grower community within the next 30 days to address concerns about the reliability of the FSAID data used to determine the base condition water use, and to discuss long-term strategies regarding Georgia users contributing to the water reductions without participating in recovery strategies.

The MFL recovery strategy's proposed impact offsets include water resource or water supply development projects, water use retirement, and implementation of other means to reduce impact, such as purchasing credits or engaging in district-led projects. However, in the LSFIR area, agriculture faces constraints on water supply development projects due to high recharge rates and a lack of alternative sources. These limitations make it difficult for agriculture to implement offset projects, particularly without clarity on the costs associated with district projects. **Given agriculture's continued efforts to enhance irrigation efficiency and conserve water use through Best Management Practices, we urge the SRWMD consider covering 100% of the costs for agricultural participation in district-led water conservation projects to offset additional impacts. We also request the SRWMD consider offering cost-share opportunities to support agriculture water users of greater than 100,000 gpd in implementing the water conservation measures required by this strategy.**

The agriculture community remains committed to being responsible stewards of Florida's water resources, but we ask that the unique challenges faced by our community be carefully considered in the final implementation of these measures. Restrictive and costly regulatory requirements will result in significant impacts to the fruit and vegetable industries in the Lower Santa Fe and Ichetucknee River Basin and threaten the sustainability of this important industry to the region and state's economy.

Sincerely,

Mikayla Rogers,
Florida Fruit and Vegetable Association

cc: Hugh Thomas, Executive Director, SRWMD