

Alliance Dairies



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October 30, 2024

Subject: Written Comments on Draft LSFIR Regulatory Strategy

To: OWP_rulemaking@floridadep.gov

To Whom It May Concern,

I am writing to submit my comments on the Draft Lower Santa Fe and Ichetucknee Rivers (LSFIR) Regulatory Strategy. As a farmer in Florida, I want to emphasize the significant role that agriculture plays in our state, particularly in North Florida, and the need for careful consideration of the potential impacts this rule could have on our industry and natural resources.

Farmers as Stewards of the Land

Farmers have a vested interest in preserving the natural resources that sustain their livelihoods. While we may not always get it right, we are committed to learning and adapting our practices to better care for the land. When new methods and technologies that benefit the environment become available, farmers are quick to adopt them. This commitment to continual improvement should be recognized in any regulatory framework.

Conservation Efforts and Credit for Work Done

Farmers are conservationists by nature and have already made significant efforts to protect Florida's water supply. These efforts include implementing advanced irrigation techniques, adopting best management practices (BMPs), and participating in programs aimed at reducing water use and improving water quality. It is crucial that the work we have already done be credited when calculating offset requirements under the new rule.

Unintended Consequences

There is a need for caution in finalizing this rule to anticipate and avoid unintended consequences. For instance, if the rule makes agricultural land use less competitive compared to housing subdivisions, we may see a shift towards more development. This could lead to greater negative impacts on our water supply than the current situation. We must ensure that agricultural land remains viable to prevent such outcomes.

The Importance of a Strong Agricultural Industry

Imagining a Florida without a strong agricultural industry does not paint a picture of a better future for our state. Agriculture is a cornerstone of North Florida's economy and community. We've seen agriculture diminish in other parts of the state, only to be replaced by concrete and pavement. We must not let that happen here. Farmland provides essential recharge to the Floridan Aquifer, and this benefit should be factored into any offset calculations upfront.

Challenges Faced by Farmers

Farmers face many challenges and are often price takers on both sides of their income statements. It is important not to place an undue regulatory burden on them, as this could exacerbate their difficulties and threaten their livelihoods. Excessive regulation could weaken the competitiveness of our farmers in global markets, leading to a collapse of the industry in this region and the replacement of local produce with imports from other countries.

The Risk of Losing Agricultural Infrastructure

Agriculture is an industry that requires years to build up the necessary infrastructure and support systems. If this industry and its infrastructure collapse due to overregulation, it will be too late to repair the damage. The loss would not only be felt by farmers but by the entire state, as we would lose a vital part of our economy, culture, and environmental stewardship.

Due to the points above, I request that proposed agricultural water use reductions be met by regional projects at no cost to producers. By working together, we can protect our water resources while ensuring that Florida's agricultural industry remains strong and sustainable.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Jan Henderson".

Jan Henderson
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