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Pamela Flores
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Florida Department of Environmental Protection
3900 Commonwealth Ave
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My name is Kelly Philman. I own and operate a family farm in Bell, FL with my wife Rachelle. We are proud of where we come from, and proud of the farm we have built together. I started farming in high school with a used cable tow irrigation system and a worn out tractor.

Together, our team has grown that farm to include almost 15000 acres and 180 irrigation systems. Our team includes approximately 50 employees who live and work in the Suwannee and Santa Fe basins. These employees spend their salaries in the many towns and businesses in the Suwannee Valley. We additionally spend multiple millions at dollars with local contractors, service providers, and dealers. We believe there is a potential loss of farms like ours, as a result of negative impacts from the lower Santa Fe and Ichetunknee River MFLs. This will have severe impacts to all of those mentioned and the communities in which they live.

We initially understood the MFL to include only a modest reduction on withdrawals across our farms. We anticipated that our operation could tolerate a 5-10% reduction in water use. We could accommodate these changes through improved technology, improved management, and possible changes in crop rotation or practices. It has recently been explained that we are looking at more drastic reductions on the level of 30% or more. I can unequivocally state that our operation cannot withstand reductions of 30% and still function in an economically sustainable manner.

I am also concerned with the determination of base condition water use. I am skeptical of the accuracy of the BCWU on my farms, as well as major concerns for the farms that weren't in production in 2014-2018. These are farms that the owners, and our farm, have made significant long-term investments into. We simply don't generate the cash flow from farming to purchase or buyout credits either from within the farming industry, or from different enterprises such as urban use.

We recognize the importance of reaching the golls associated with the MFL. We have implemented practices as well as demonstrated new technologies to neighboring farms in the quest to reach those goals. I whole heartedly believe that the reductions associates with the proposed MFLs will result in the total failure of most farming and agriculture systems in this region.

I sincerely appreciate the efforts by your agency to meet the MFL Recovery Strategy. However, I have serious concerns for the effects of the proposed strategy on the economic and social fabric of North Florida. If you would like to discuss my concerns in more detail, please feel free to contact me.

Regards

Kelly Philman