



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
The Capitol • Tallahassee, FL 32399-0800
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Please Respond to:

May 18, 2007

Mr. Kirby Green, Executive Director
St. Johns River Water Management District
Post Office Box 1429
Palatka, Florida 32178-1429

Mr. David Moore, Executive Director
Southwest Florida Water Management District
2379 Broad Street
Brooksville, Florida 34604-6899

Ms. Carol Wehle, Executive Director
South Florida Water Management District
Post Office Box 24680
West Palm Beach, Florida 33416-4680

Dear Directors:

I am writing to each you about the development of the proposed Central Florida Coordination Area rule amendments concerning several issues that could affect agriculture's future viability and Florida's ability to contribute to our national goal of long term energy security.

Let me begin by saying that I understand that projected resource limitations on traditional water supplies support the need for a rule. I also recognize, for reasons we have all discussed over the years, that accurate agricultural water use projections are challenging and, given recent trends, that the rule as currently written is likely to have only limited applicability to most current agricultural water users.

However, I am concerned that the definition of similar applicant in the rule, based solely on projected post-2013 water demand, would include any agricultural user requesting an increase in allocation beyond that date without consideration of the dramatic differences between agricultural self suppliers, who must be flexible with crops and cropping techniques in order to remain in business, and who have limited resources compared with other users who may have access to tax, bonding, and other funding options for supplemental or alternative water supply development. The proposed rule appears to attempt to address this issue through the opportunity to demonstrate that supplemental water supply is not economically, environmentally, or technically feasible. Although my feeling is that agricultural applicants should be able to make this demonstration successfully if it were not overly complicated, no criteria are provided for either the development of the demonstration by the applicant or review and acceptance by the District.



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Beyond the issues identified above, this rule effort should only proceed with a clear linkage between Florida's water supply and energy policies. As you know, national and state energy policies endorsed by both the President and Governor include greater reliance on the production of biofuels. Florida, with a favorable climate and innovative agricultural producers, is well positioned to be a significant contributor to our nation's future energy independence. In fact the University of Florida has estimated cellulosic ethanol technology, relying on biomass production from Florida agriculture, has the potential capacity to replace our current state gasoline demand of 8.6 billion gallons/year.

As our understanding of the role Florida will play in this developing industry has grown, the Governor and legislature have supported a dramatic increase in state funding for alternative energy development, from \$15 million last year to \$62 million for the 2007 – 2008 fiscal year. Although the long term success of our energy program will be dependent on many variables, access to sufficient water resources for both the agricultural and manufacturing components will be essential to success and further underscores the importance of making sure the Central Florida Coordination area rule is able to accommodate potential changes in agricultural water needs.

Given the importance of this issue I have asked Chuck Aller to contact each of the Executive Directors of the Districts involved in the Central Florida Coordination Area to arrange for a presentation and productive discussion of the issue at the July Soil and Water Conservation Council meeting in Marco. In the meantime, if you have any questions please feel free to contact Chuck directly at (850) 410-6732.

Sincerely,



CHARLES H. BRONSON
COMMISSIONER OF AGRICULTURE

cc: Secretary Mike Sole
Mr. Ben Bolusky
Mr. John Hoblick
Mr. Michael Stuart