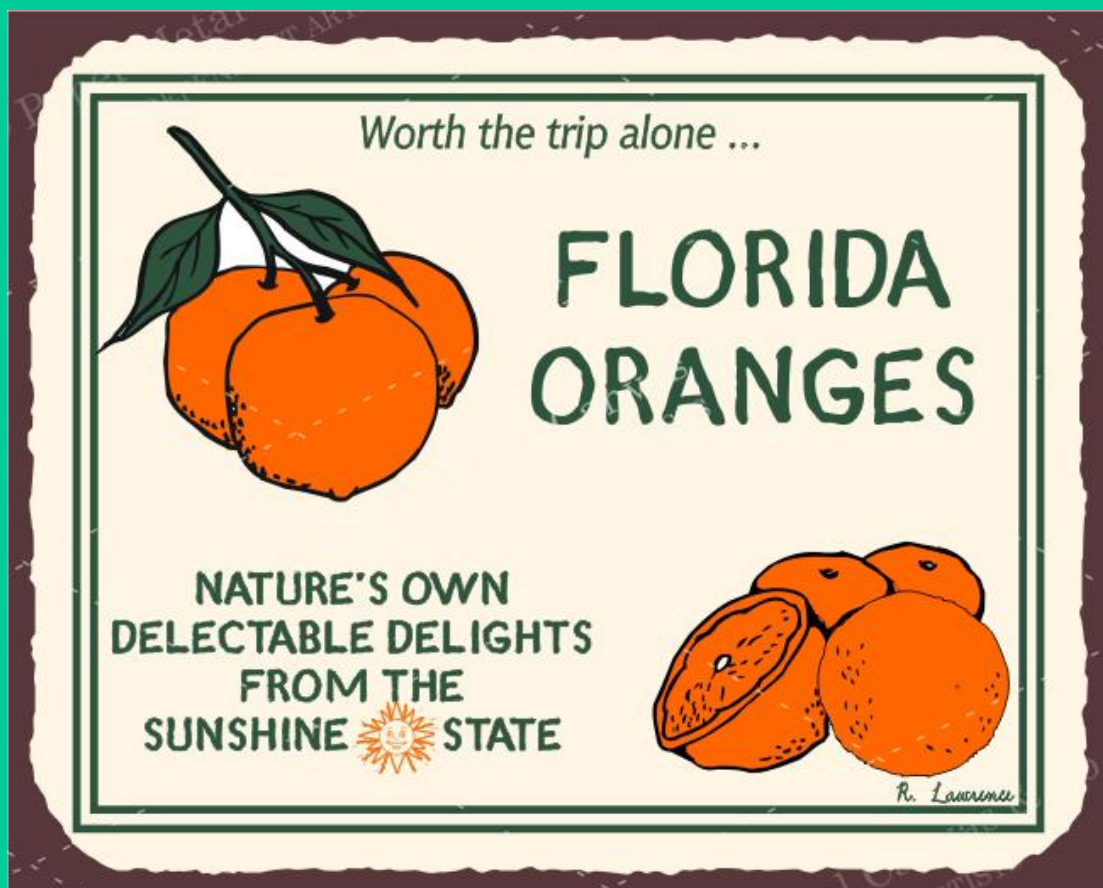


Citrus Task Force
Findings and Opportunities
Report

January 25, 2018



**Citrus Task Force
Findings and Opportunities
Final Report**

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I. Citrus Task Force Executive Summary

The District recognizes the key role the citrus industry plays in Florida's history, identity and economy. The citrus industry contributes \$9 billion per year to the state economy and employs nearly 46,000 Floridians. Over the last 20 years, the citrus industry has suffered tremendous losses from greening and other tree diseases as evidenced recently by its lowest annual production since World War II. In addition, it is faced with more than \$700 million in economic losses following Hurricane Irma. At the direction of its executive director, the Southwest Florida Water Management District (District) formed the Citrus Task Force (CTF) to address concerns the citrus industry may have with the District and use their feedback to implement business improvements that will assist them through this critical time.

The CTF commenced in April 2018 with an outreach effort involving more than 45 stakeholders, which included government entities, permittees, associations, consultants and industry leaders. The feedback was organized into consensus and non-consensus items. A consensus item is when more than 50 percent of the stakeholders expressed the same concern.

Much of the feedback that was received focused on the challenges the citrus industry was facing and suggestions on how the District could assist or improve their permitting and funding processes. Based on input received, the CTF developed the most viable options the District could implement to address these concerns without compromising the District's mission to protect water resources.

Implementation of these options will also benefit other agricultural commodity groups, improve the District's customer service and business processes, and reduce unintended administration costs. The following is a list of options the District is working to address by the end of fiscal year 2020:

- Assess meter testing frequency requirements and consider options to reduce and/or offset grower costs without compromising data integrity.
- Evaluate technology that offset the monthly pumpage data collection costs for the grower and provides quantifiable benefits such as improvements in data integrity, water savings, etc.
- Utilize user feedback to improve the District's data entry system and expedite applicable upgrades.
- Update the District's agriculture irrigation model (AGMOD) to ensure the appropriate amount of water is allocated for irrigation and that it recognizes current agricultural practices.
- Memorialize practices that promote the conversion of permitted surface water management systems via the District's exemption program (AGSWM) that conserve water and benefit the environment.
- Initiate rulemaking to ensure water conservation credits are applied at the 10-year interval for 20-year permits for non-mulched crops (i.e., citrus, sod, etc.).
- Memorialize in the District's compliance process the practice of considering "actual rainfall" in the District's irrigation model (AGMOD) when evaluating overpumpage.
- Update FARMS Model Economic Study with a focus on precision irrigation, update cost-benefit rates to increase opportunities for more growers to participate in water conservation projects, and where possible stream line the contract process.
- Maintain the District's agricultural personnel and expertise through succession planning and the development of service area expertise to assist in maintaining local relationships.
- Ease unnecessary economic burdens when water use permits less than 100,000 gallons are combined triggering metering requirements.
- Improve participation in the District's Water Use Permit advisory meeting based on stakeholder input.
- Create a one-time extension of the recertification requirement for agricultural permitted surface water management systems upon verification the system is functioning as designed.

Introduction

Purpose

The Citrus Task Force (CTF) was formed by the executive director of the Southwest Florida Water Management District (District) to solicit feedback from the citrus industry on its interactions with District staff and the administration of District regulatory and funding programs. This initiative began in April 2018 and is part of the District's ongoing effort to improve customer service to stakeholders and identify areas of improvement in business processes. The initiative will include meeting with stakeholders, evaluating the feedback received and then developing options to address the feedback. A key objective is to identify areas of improvement in the administration of applicable funding and regulatory programs that can reduce unnecessary economic burdens being incurred by the citrus industry. The CTF is comprised of Ross Morton (Ombudsman), April Breton (Water Use Manager), Chris Zajac (FARMS Program Manager) and Mark Luchte (Agricultural Regulation Program Manager).

Background

The citrus industry is a major economic driver within the state of Florida and is facing immense challenges as a result of agricultural hardships. For perspective, 60 percent of all citrus production in the United States comes from Florida, bringing in \$1 billion in sales each year. Over the past decade, citrus-related tree diseases have, and continue to, adversely impact tree health and harvest yields. In addition, the impacts of Hurricane Irma created losses to the Florida citrus industry that are expected to exceed \$761 million. This has resulted in the lowest crop yield for Florida's citrus industry since the 1940s. The Florida citrus industry is facing unprecedented economic perils.

Citrus is the largest irrigated crop within the District, utilizing 57 percent or 184.1 million gallons per day (MGD), of the total agricultural allocated amount. However, citrus is one of the most efficient large production crops from a per-acre irrigation allocation. The 2016 estimated permittee allocation for all agricultural uses within the District's 16-county service area is approximately 327 MGD, which represents 31 percent of the total permitted uses within the District (1,027.9 MGD).

At the direction of the Governor's Office in 2012, the Florida Department of Environmental Protection (FDEP) and water management districts were directed to consolidate their applicable administrative codes into a statewide rule. At the same time, the District was undergoing a restructuring and reduction in staff. Since 2012, the District has been committed to ensuring these changes did not result in inadvertent economic hardships to the community it serves.

The District continues to hold periodic meetings with the public through its Water Use Permitting (WUP) and Environmental Resource Permitting (ERP) advisory meetings as well as other outreach efforts (Agricultural Advisory Committee meetings, etc.). These interactions have exposed the citrus industry's extreme economic hardships, as evidenced by the drop in citrus production to historic low levels. In response, the District's executive director established an outreach effort known as the CTF.

II. Outreach

The CTF developed a communication plan to ensure they were able to meet with the key citrus industry stakeholders within a 60-day period (Appendix I). They identified more than 45 stakeholders, which included associations, consultants, permittees and agencies. With a few exceptions, they met with all stakeholders identified in the communication plan. Most meetings were face-to-face with a few done by telephone or written correspondence. A meeting summary was developed for each and can be found in Appendix II of this report.

Having a meeting summary allowed the team to consolidate all comments and identify which concerns were most common among stakeholders or unique to a specific stakeholder. The feedback was broken into two categories: consensus issues and non-consensus issues. An issue is considered a “consensus” if more than 50 percent of the stakeholders expressed similar concern or comment.

III. Summary of Feedback

The following is a list of the consensus issues:

- Frequency of meter testing
- Options to reduce monthly pumpage reporting costs
- Data entry system
- Update AGMOD
- Flexibility on the conversion of permitted surface water management systems to AGSWMs
- Factors used in determining overpumpage
- Non-mulched crop 5-in-10 credit accumulation for 20-year permits
- Facilitating Agricultural Resource Management Systems (FARMS)
- Customer service and succession planning
- Combining of non-metered individuals triggering metering (formerly referred to as small generals)

The following is a list of the non-consensus issues within a subset of a common theme:

- Retain a licensed Florida engineer on the FARMS staff
- Prefer local vendors for FARMS projects
- Create cost-share mainlines for Citrus Under Protective Screen (CUPS) projects
- Create cost-share rates specific to citrus (75 percent)
- Reenergize the WUP advisory groups
- Extend the due date of the recertification requirement by professional engineer if field observation verifies surface water system is functioning as designed
- Develop a process that allows private consultants to participate in the AGSWM program like the Natural Resources Conservation Services (NRCS)

These lists are a general summary of the concerns that were received by the CTF. In the next section, these items will be fully evaluated, and options will be explored to address these concerns. Stakeholders often provided potential solutions to address their concerns during the interviews. In instances where these options received a consensus from the stakeholders, it will be noted in the report.

IV. Options to Address Consensus Concerns

This portion of the report provides context for each concern the stakeholders communicated, options developed for each concern and a background of the concern to better understand the impacts. The CTF brainstormed each concern with internal personnel to develop the most viable option to present to Executive. Internal meetings included participation from staff, managers, bureau chiefs and division directors from Regulation, Resource

Management and Office of General Counsel. Each of the most viable options listed were presented to Executive (11/27/2018) and the Agricultural Advisory Committee (12/06/2018) and received preliminary approval to proceed. The District is working to address all 10 consensus items in some manner and two of the relevant non-consensus items. The following contains a description of each item and how it will be addressed.

Concern No. 1 Assess meter testing frequency requirements and consider options to reduce and/or offset grower costs without compromising data integrity.

Feedback: The cost associated with meter testing was a concern of every stakeholder interviewed, especially those with operations in the St. Johns River Water Management District (SJRWMD), which only require meter testing once every 10-years. Larger growers responsible for multiple metered wells indicated frequent meter testing is a cost to their operation. For instance, the manager for Joshua Water Control District indicated this expense exceeds \$40,000 for each five-year meter testing interval. Other feedback consisted of the following:

- Growers consider this a significant cost to their operation
- Growers noted the SJRWMD only requires meter testing once every 10-years and provides funding through their Mobile Irrigation Lab (MIL) to offset those costs
- Inconsistency on an issue that is essentially the same

Background: The average approximate cost of a meter test based on feedback is \$250 per well. In total, the citrus industry operating within the District spends approximately \$931,000 to perform meter tests for 3,724 metered wells during each required five-year interval. The District does not have enough data to evaluate impacts on the accuracy and reliability of its usage data/estimates going to a one to 10-year (1:10) meter testing interval as compared to one to five-year (1:5) testing interval. However, it may be possible for some of this information can be extracted from the meter testing forms submitted by the WUP permittee as a requirement of the permit or in some other manner. For comparison purposes, SJRWMD total number of water use permits is 2774, the SWFWMD is 7299. SJRWMD has monitoring requirements on 1,167 water use permits and SWFWMD has 2455. However, most of the monitoring of withdrawals for SWFWMD is by meter, SJRWMD allows alternative hour meter calculations. The following is the approximate number of metered wells in use by agriculture and citrus in the SWFWMD:

- Metered Ag wells 6,295
- Metered Citrus wells 3,724

Considerations:

- Accuracy of data and ability to accurately assess resource concerns
- Meter testing requirement going from 1:5 to 1:10
 - Agriculture \$1,573,750
 - Citrus \$931,000

Most viable option(s) to address concern:

- Initiate a study utilizing data currently available to the District's (i.e., FOR, etc.) to evaluate the impact to the District's accuracy and reliability of its usage estimates of changing the meter accuracy test frequency from 1:5 to 1:10 years. Extracting information from the FOR will require accessing each WUP in the FOR, taking the information contained in the pdf and entering it into a searchable database. This also may involve interviewing permittees because the meter test does not necessarily contain the failed test. Based on the results of the study, determine the feasibility of going to a 1:10 frequency.
- Develop a reimbursement program or expand the MIL to offer this service to the regulated agriculture community to offset costs to encourage voluntary meter testing aimed at improving data accuracy.

Concern No. 2: Evaluate technology that offset the monthly pumpage data collection costs for the grower and provides quantifiable benefits such as improvements in data integrity, water savings, etc.

Feedback: Monthly reporting by the permittee to gather and input pumpage data to the satisfaction of the District is an expense for the grower. Growers who submit data in other water management districts are only required to do so quarterly. This is a contentious issue for the growers with the District. The following is feedback from the stakeholders concerning this expense:

- One-hour travel per well and other miscellaneous expenses (\$25 an hour) - \$25 per meter
- Five minute per data entry per well (\$25 an hour) - \$2 per meter
- Total approximate monthly cost to the citrus industry (3,724 meters x \$27) - \$100,548
- Total yearly difference in cost compared to SJRWMD and the District - \$804,384

Background: Monthly reporting is interwoven into the various requirements of 40D-2, F.A.C., which includes the water use caution areas. This rule specifically addresses critical groundwater resource concerns specific to the SWFWMD, and monthly reporting is linked to key allocation limitations associated with peak month and the five and 10 allocation for non-mulched crops. In addition, the stakeholders interviewed indicated it was not economically beneficial for them to read the meter monthly and then input the data quarterly to the District. The following contains some factors that prohibit such action by the District:

- Peak month allocation is a rule requirement and specific to the District
- Monthly versus quarterly reporting would require a significant overhaul of the SWUCA rules to accommodate such an action
- This action would also compromise the ability of a grower to stay within their allocated annual average quantity due to peak month allowances and other factors

Considerations:

- No Action
- Record monthly but only require input quarterly
- Incentivize meter AMR/AMI technology to offset data collection costs
- AMR/AMI versus standard meter
 - ✓ Standard meter cost \$1,500
 - ✓ AMI meter cost \$2,900 (telemetry)
 - ✓ Life of meter approximately 20 years
 - ✓ 20-year cost in report compared to other districts \$16,087,680
 - ✓ 20-year upgrade cost to the District \$5,213,600
- Quarterly reporting would require a major revision to 40D-2, F.A.C. due to peak month and its emphasis on conservation
- Greater consistency between districts in the expense the permittee incurs associated with pumpage data collection and input
- Reduction in data collection expenses to the agricultural industry

Most viable option(s) to address concern:

- Develop a funding program that promotes the use of Advanced Metering Infrastructure/Automated Meter Reading (AMI/AMR) technology. The first phase of this effort will be to determine if the use of this type of technology offsets monthly pumpage data collection costs of the grower and provides any benefits to the District such as improvements in data integrity, water savings, etc. If this first phase demonstrates such a benefit, the second phase would be the development of a funding program. This might involve the District offsetting the difference between a standard meter and AMI/AMR. The life of a meter is approximately 20 years, so over that span all the meters could be upgraded to the AMR/AMI

technology. A pilot program can be developed to determine and/or verify improvements to data integrity, potential water savings, etc.

Concern No. 3: Utilize user feedback to improve the Districts Data Entry System and expedite applicable upgrades when possible.

Feedback: This was a contentious item for the growers and most of the stakeholders shared a negative experience when entering data into the District's data entry system. Despite the negative experiences, they praised the assistance received from the District's business process technicians in resolving their issues. The most intense complaints came from growers who have operations in other water management districts that contend those systems are much more user-friendly. The following is a list of their concerns:

- Too complex and not user-friendly
- It takes longer to indicate nothing has changed than it does entering new data
- Stop changing the system because it takes too much time to understand how to use it
- SJRWMD and SFWMD data entry systems are more user-friendly
- Consider adding a feature where only items to be updated need be changed
- Delinquency notices need to better explain what is needed

Background: The District recently updated its data entry system, and this resulted in much of the negative feedback. Although the District provided plenty of notices and assistance, most of the stakeholders feel the system is not user-friendly.

Considerations:

- No action.
- Due to longer renewal durations (20 years), the monthly exercise of the permittee entering data will essentially become their main interaction with the District. Their impression of the District will be largely influenced by this monthly activity. The more the data entry system is made user-friendly and tailored to its customer's needs, the better impression the grower will have of the District.
- There is a labor expenditure for the grower entering data and the District in aiding the grower. Enhancing the system to match customer needs will reduce labor expenditure and improve customer relations.

Most viable option(s) to address concern:

- Expedite upgrades to the District data entry system that allows users to prepopulate unchanged information and only update areas that have changed (i.e., entering zero on wells not in use, crop reports).
- Develop an action plan that ensures periodic updates of the District's data entry system that specifically targets customer needs based on customer input. For instance, a component of the plan would include developing a periodic survey specific to agriculture data-entry users that is designed to identify problem areas and features they want to improve. Any enhancements identified to improve the customer experience should be prioritized.

Concern No. 4: Update the District's agriculture irrigation model (AGMOD) to ensure the appropriate amount of water is allocated for irrigation and that it recognizes current agricultural practices.

Feedback: Stakeholders voiced concern that in certain circumstances the District was not allocating the appropriate amount to successfully grow and maintain healthy tree growth along the Ridge. In addition, they were concerned the District was not recognizing the changes that tree diseases were having on grove design, which could impact the amount of allocation needed to sustain grove production. Changes in density and tree lifespan is not accounted for in the District's standard water allocation model known as AGMOD.

Background: Citrus greening has forced growers to adopt increased tree densities, both in the number of trees within a row and the number of rows within a given block. Furthermore, trees now have a shorter production lifespan and undergo a more frequent replacement cycle. The following are factors not considered in AGMOD:

- Historical tree densities were planted at approximately 155 trees per acre. To combat production losses, tree densities per acre can now exceed 450 trees.
- A past study of AGMOD, that included District staff, indicated WUPs on the Ridge may be slightly under allocated due to unique climatic factors (see Appendix III).

Considerations:

- No action.
- Resource and regulatory constraints are a limitation on allocation.
- District allocate a more appropriate amount depending on the site-specific conditions.
- Improve customer relations with the citrus industry by avoiding unnecessary compliance actions.
- Reduce District labor and permittee expenses by addressing unwarranted compliance concerns.

Most viable option(s) to address concern:

- Develop and implement a research proposal that updates AGMOD and specifically addresses tree densities and allocations on the Ridge.
 - Research is being funded by the District to investigate this issue. Project B413, Effects of Increased Citrus Tree Density on Supplemental Irrigation Requirements, is a three-year study being funded in cooperation with the University of Florida.
 - The purpose of the research project is to evaluate the water use requirements for various densities of citrus tree resets.
 - The project started in fiscal year 2018 and the total cost is \$168,623.
- Adjust or eliminate the 10.6 percent acreage reduction factor internally built into AGMOD, which is a penalty applied only to citrus growers, depending on the research results.

Concern No. 5: Memorialize the practice that facilitates the conversion of permitted surface water management systems via the District's exemption program (AGSWM) that conserve water and benefit the environment.

Feedback: Growers indicated a concern of maintaining District personnel that have experience in agriculture. Some of this concern will also be covered under Concern No. 9. This concern was specific to the growers that have stormwater management systems under a formal permit authorization that under today's criteria may have qualified for an exemption. The following are list of factors that need to be considered in addressing these concerns:

- Maintain flexibility and "out of the box" approaches when evaluating proposed drainage

designs and modifications.

- Eliminate unnecessary maintenance and inspection expenses, where possible, imposed by permits that qualify as an exempt activity under current practices.

Background: Prior to 1990, the only surface water alteration authorization option available to growers was a Management & Storage of Surface Waters permit known as MSSW — a predecessor to the Environmental Resource Permit (ERP). As part of the permitting process, growers are required to periodically recertify the drainage system's functionality with a statement from a professional engineer (P.E.). Since 1990, growers have been able to voluntarily participate in the District's highly touted AGSWM exemption confirmation program. AGSWM participation has virtually replaced the need for formal surface water permitting except in proposals involving wetland impacts and associated mitigation. AGSWM exemption confirmations do not expire and do not require P.E. recertifications. They also incorporate a site-specific pest, nutrient, drainage and irrigation best management practices (BMPs) conservation plan to address the quality of water discharged. The District's unique AGSWM program has been recognized as a progressive approach to surface water authorizations and the program is complimentary with the Florida Department of Agriculture and Consumer Services (FDACS) statewide adopted BMP manuals.

Considerations:

- No action.
- The growers would no longer be required to have a periodic P.E. recertification of their overall surface water management system.
- Onsite treatment/attenuation reservoirs could be more easily adapted to irrigation water supply sources thereby conserving groundwater and oftentimes improving the health of the trees.

Most viable option(s) to address concern:

- Development of a guidance document that establishes the flexibility and precedence for staff to evaluate a proposed conversion where the ultimate outcome is conservation of groundwater resources and a water quality benefit.

Concern No. 6: Memorialize in the District's compliance process the practice of considering "actual rainfall" in the District's irrigation model (AGMOD) when evaluating overpumpage.

Feedback: Growers contend they spend considerable time managing their irrigation systems and due to events beyond their control do not want to be listed on the District's Governing Board overpumpage report when it is unwarranted. In certain circumstances, growers who are listed as overpumping can demonstrate to compliance staff by factoring in antecedent conditions they are using the appropriate quantity. However, in the interim they are being labeled as poor irrigation managers and in many instances incurring the expense of a consultant to resolve the compliance matter with the District. In addition, it would likely be a catastrophic event to the grower to be prohibited from irrigating their grove based on a 5-in-10 allocation when antecedent conditions and rainfall trends warrant such action to maintain tree health. The following was suggested:

- Do not initiate enforcement or list the grower on the Governing's Board overpumpage report if AGMOD indicates after factoring in actual rainfall conditions the appropriate amount was applied to sustain minimum tree health.

Background: Extreme drought years or multiple consecutive below-average rainfall years can cause growers to lose all their accumulated SWUCA credits (discussed more thoroughly in the following section) or cause groves outside of the SWUCA to exceed their 2-in-10 rainfall year allocation.

Over the years, the District has been inconsistent on its approach in addressing this situation. Prior to 2012, the District had a written policy (IOP/ENF.002.003) that was presented to the Governing Board and specified the District would not pursue enforcement in those circumstances that, due to antecedent conditions, the growers pursuant to AGMOD were applying the appropriate quantity of water. This policy and process was embraced by growers, the Agricultural Advisory Committee, senior Regulatory management, Office of General Counsel and the executive director and later presented to the Governing Board. This written guidance was retired post 2013 and the District currently evaluates these circumstances without written guidance.

Considerations:

- No action.
- Improve consistency of District compliance action both short and long term.
- Avoid listing growers on the Governing Board overpumpage report that were applying the appropriate quantity of irrigation water due to antecedent conditions.
- Avoid unnecessary compliance/enforcement actions and labor expenditure from all parties.
- Improve customer relations.

Most viable option(s) to address concern:

- Reinstate IOP/ENF.002.003 or develop a guidance memorandum that establishes the following parameters if AGMOD demonstrates due to antecedent conditions that the appropriate amount of water was applied to sustain tree health:
 - Permittee will not be listed on the Governing Board overpumpage report.
 - Enforcement action will not be pursued.

Concern No. 7: Initiate rulemaking to ensure water conservation credits are applied at the 10-year interval for 20-year permits for non-mulched crops (i.e., citrus, sod, etc.).

Feedback: Credits are a poorly understood concept for the growers. The main concern expressed by the grower was receiving overpumpage notices that, in many circumstances, were resolved once the District applied the credits or the permittee submitted the appropriate crop reporting form. The main concerns expressed with this issue were as follows:

- Avoiding compliance notices from the District and publication on the District's overpumpage report.
- A better notification process of credit accumulation.
- On established groves, why is it necessary to keep submitting new crop reports versus only reporting what has changed (see Concern No. 3).
- All other districts allocate based on a drier rainfall year.
- Enough credits should be allocated to avoid unnecessary compliance notices.
- Responding to compliance actions from the District is an expense to the growers, especially the larger operations that often rely on consultants to address the matter, which is an unnecessary expense.

Background: The SWUCA covers all or part of the lower eight counties within the District. Outside of the SWUCA, crops are issued a higher annual allocation rate based upon drought conditions (2-in-10 rainfall year meaning only 20 percent of rainfall years on record were drier). Within the SWUCA, crops receiving effective rainfall, like citrus, are issued a lower allocation rate based upon normal conditions (5-in-10 rainfall year meaning 50 percent rainfall years on record being drier). Due to annual rainfall fluctuations, growers within the SWUCA are then given a 'water savings

bank account' of credits. The account is initially loaded with twice the difference in water allocation between drought and normal rainfall conditions. The account is then reloaded with that same amount every time the WUP is renewed. For example: if a citrus grove is permitted for 14 inches and the irrigation requirements for a 2-in-10 year would have been 16 inches, then the initial credit is two times two inches, or four inches. To encourage conservation, growers can "carry forward" any unused permitted irrigation quantities, which can be used in subsequent drier years at the site where they were earned. A consequence of increasing the duration of WUPs from 10 to 20-years has at times resulted in credit reloading at the ten-year interval being inconsistently applied. Current practice is to reload the credits at the ten-year interval.

Considerations:

- No action.
- Reduce the number of automated letters warning of low credit balances and encounter fewer overpumpage cases.
- Reduce unnecessary friction with citrus industry.
- 5-in-10 allocation is a conservation tool and was not intended to be a mechanism to penalize growers who were applying appropriate irrigation management. Reloading the credits twice within a 20-year permit would not diminish this conservation tool.
- Past interpretations have resulted in inconsistent application on the number of reloads

Most viable option(s) to address concern:

- A consensus on increasing the reloading frequency of credits to every 10 years was achieved. This is already the informal practice of staff and a specific permit condition is included on newer Water Use Permits. A rule is necessary to codify this current informal practice.

Concern No. 8: Update FARMS Model Economic Study with a focus on precision irrigation, update cost-benefit rates to increase opportunities for more growers to participate in water conservation projects, and where possible streamline the contract process.

Feedback: The overwhelming response from stakeholders during the interview process indicated the program is a success and is widely supported by growers, consultants, vendors and other agencies. When asked how the District might improve on such a successful program the consensus was that its contract and contracting process could be improved. The stakeholders repeatedly stated that the contract itself was too long and complicated, and several stakeholders cited examples of producers they knew that would not apply for funding due to the complex contract involved. Stakeholders also expressed concern regarding the contract development process. Producers explained that in most cases they have a short window of opportunity to construct water conservation BMPs on their farms due to planting, harvesting and field maintenance schedules. The concern is that it takes too long for the contract to be developed and executed. Many producers are starting construction on their projects before the contract is executed to meet the short windows of opportunity to do the work on their farms. Stakeholders suggested we look at the way FDACS handles their cost-share program regarding the agreement and agreement development process.

Background: The FARMS program is a cost-reimbursement program to assist producers in implementing water conservation BMPs. The program operates under Chapter 40D-26, F.A.C. known as the FARMS Rule. The District accepts applications for projects throughout the year and uses a defined set of criteria to evaluate the cost and associated water resource benefits of each proposed project. If a project meets these criteria it is forwarded to the Governing Board for

approval. Once approved by the Governing Board, the producer enters an agreement with the District to construct and implement the water conservation BMPs.

Considerations: Consider revising the FARMS contract and reduce the content/text. Staff are coordinating efforts to develop FARMS contract templates with FARMS staff, Procurement and Office of General Counsel. This may include opportunities to reduce text within the agreement and expedite the contract development process. The FDACS cost-share agreement is six pages and includes an Operation and Maintenance (O&M) period and a pay-back clause. FDACS requires their staff to process the agreements within five days. No rule changes will be required to implement the suggested improvements if pursued.

Potential benefit(s) of addressing concern:

- Reducing the content of the contract may attract small to medium producers to apply for funding.
- Expediting FARMS agreements will assist producers in constructing and implementing their projects with reduced risk associated with beginning work prior to a fully-executed agreement.

Most viable option(s) to address concern:

- Reduce the contract length by removing provisions that producers perceive as unnecessary.
- Streamline the internal contract development process to get contracts to producers faster (30-45 days following Governing Board approval was suggested many of the stakeholders).

Increase cost-share for precision irrigation projects

Feedback: Stakeholders provided significant input regarding precision irrigation systems. There are a variety of BMPs that fall under this broad category and include electronic controllers on pump stations, valve automation, weather stations and soil moisture sensors. The concern relates to the cost to implement precision irrigation BMPs and the need to increase the funding available for reimbursement.

Background: The FARMS program uses the Model Farms Economic Study as the guiding document to establish acceptable costs/1,000 gallons saved. This study is updated approximately every five years and incorporated into the FARMS Rule. The most current study was updated in 2016 and provides costs up to \$1.79/1,000 gallons saved. Producers with very large permitted quantities meet the criteria but small to medium farms or farms under 500,000 gpd struggle to meet the cost-benefit requirements of the program.

Considerations: Increasing the allowable costs for precision irrigation BMPs may be accomplished by updating the Model Farms Economic Study more frequently and increasing the allowable costs for precision irrigation technologies. Staff have included funding in the FY20 budget to update the Model Farms Economic Study (one year earlier than the typical five-year cycle) and plan to place emphasis on precision irrigation technologies. Please note this will require an update to the FARMS Rule to incorporate the new study and update cost share rates. However, there is a statute that exempts cost-share programs from rule making. It may be appropriate for the District to eliminate the FARMS Rule pursuant to the applicable statutes and replace with a Board policy prior to taking the above action.

Potential benefit(s) of addressing concern:

- More producers will implement precision irrigation technologies on their farms and increase irrigation efficiencies.

Most viable option(s) to address concern:

- Increase the allowable cost/1,000 gallons to attract more participation in the program.

Increase Cap for the Mini-FARMS Program

Feedback: Stakeholders showed strong support for the District's Mini-FARMS Program and suggested the cap be increased to promote participation by small citrus growers throughout the District.

Background: The Mini-FARMS Program promotes the implementation of water conservation BMPs for small producers with less than 100 acres of irrigated area. The reimbursement rate has been capped at \$5,000 for eligible BMPs for several years. Stakeholders indicated that \$5,000 is not enough to incentivize precision irrigation because it does not cover enough of the total project cost.

Considerations: The Mini-FARMS Program was revised in fiscal year 2018 to increase the cap from \$5,000 to \$8,000. As a result, 100 percent of the budgeted funds (\$100,000) was expended for the first time in several years. The Mini-FARMS budget was increased in FY19 from \$100,000 to \$150,000. Staff conducted a DIVE project in fiscal year 2018 to streamline the review, approval and reimbursement process. The new process will be implemented in fiscal year 2019. Pending program participation in fiscal year 2019, revisions to the Mini-FARMS Program may include increasing the cap and/or annual budget. The Mini-FARMS Program does not operate under the FARMS rule so no rule changes are required to implement changes to the program.

Potential benefit(s) of addressing concern:

- Increased cap will encourage more participation by small citrus growers.

Most viable option(s) to address concern:

- Increase cap from \$5,000 to \$15,000.

Increase Outreach

Feedback: Several stakeholders suggested we increase outreach efforts to make growers aware of the cost-share opportunities available through the District. Suggestions included attending trade shows and commodity group meetings. The stakeholders indicated that a lot of producers are not aware of the cost-share programs we offer or may not understand how to apply. It was suggested that we offer one-on-one assistance in applying for cost-share.

Background: The FARMS Program has developed a communications plan that includes a list of events staff attend to promote the District's cost-share programs. The annual budget for attending events has increased each of the last three years to place additional emphasis on outreach activities. As a result of the CTF, FARMS staff coordinated a cost-share workshop in Arcadia on Sept. 12, 2018, targeting Peace River Valley Citrus Growers Association members. It was well attended. The cost-share workshop included speakers from the District, FDACS, Natural Resources Conservation Service (NRCS) and the Farm Service Agency (FSA). Each participating organization explained their respective cost-share programs and answered producer questions. Staff will continue to look for opportunities to engage producers to promote cost-share opportunities. FARMS staff have incorporated outreach activities into their annual performance evaluation goals.

Considerations:

- No action.
- Revise contract and reduce content.
- Expedite contract development.
- Increase allowable costs for automation.
- Increase cap for Mini-FARMS.
- Increase outreach to producers.

Most viable option(s) to address concern:

- Review the existing FARMS communication plan with the Communications Section to determine if the FARMS program outreach efforts to the citrus community can be improved and implement any recommendations.

Concern No. 9: Maintain the District's agricultural personnel and expertise through succession planning and the development of service area expertise to assist in maintaining local relationships.

Feedback: A general theme among all the stakeholders was the worry over the loss of District personnel with agriculture expertise and the impact it would have on their business interactions with the District. Along these lines the stakeholders provided the following input:

- In most situations, the customer service provided by the District was exceptional. Growers felt that staff went above and beyond in assisting them with inputting data, FARMS projects, WUP reviews, surface water reviews and compliance-related issues. Some consultants indicated that select staff could become defensive in certain circumstances.
- Growers want to make sure that Regulation maintains a customer service-oriented posture with the agricultural community, maintains a flexible approach in working through issues and understands agriculture is a unique industry.
- The District's succession plan in replacing agricultural personnel due to unexpected turnover or retirement.
- At times there are inconsistent reviews due to the lack of agricultural expertise such as the determination of arable acreage during WUP renewals.

Background: Prior to the District's reorganization in 2012, permitting staff and local agricultural teams were available in each service office. The centralization of the permitting staff, especially as it relates to WUP reviews, severed the grower's local relationships with permitting staff. In addition, due to staff reductions, local agricultural teams were no longer supported by the District. However, increases in technology and other related efficiencies such as electronic permit renewals likely mitigated many of these impacts.

Considerations:

- No action.
- Maintaining agricultural relationships.
- Succession of personnel with agricultural expertise.
- Disruption is customer service.
- District permitting is centralized with limited staffing resources.

Most viable option(s) to address concern:

- Designate local agricultural teams for each service office.
 - Act as a point of contact for the agricultural community when working through contentious issues and be a resource for internal staff.

- Performance metrics would be established to ensure a level of agricultural activity and field training is performed each year.
- Designate a WUP hydrologist to the regional team that would serve as lead for WUP personnel on permit reviews. Due to workload constraints associated with permit and compliance reviews, the District may consider adding an FTE to the regional team to perform this function full time.
- Conduct an internal workshop with staff involved in the review of water use permits with a focus on consultant interactions.

Concern No. 10: Ease unnecessary economic burdens when water use permits less than 100,000 gallons per day are combined triggering metering requirements.

Feedback: An administrative rule change occurred as part of Consumptive Use Permitting Consistency (CUPcon) in 2014, since that time the citrus industry feels the District has been more aggressive in combining permits that trigger metering requirements. The citrus industry expressed the following concerns:

- The use of “common enterprise” is a newly introduced term in the rule that is used to combine parcels under similar ownership that fails to recognize historic industry practices in buying and selling parcels as a commodity.
- The term “District determines,” due to the fact the other terms identified above are not defined, makes this rule capricious and arbitrary.
- The District’s application of this rule since 2014 as compared to prior the rule change has resulted in a significant economic impact to the citrus industry.
- Meter accuracy of small quantities (i.e., 33,000) on small tracks of lands as compared to the Districts current method of estimating non-metered citrus use is not appreciable more accurate.

Background: CUPcon, administratively revised *Basis of Review* rule 2.4(4) (Page B2-1) in collaboration with the other water management districts into uniform Rule 40D-2.041, F.A.C. The rule was effective on May 14, 2014. Since that time, the District has received numerous complaints from the citrus industry asserting the administrative rule change had unintended economic impacts. Prior to the rule change SWFWMD *Basis of Review* used the terminology “*may apply*”, which may have been intended to apply to public supply but was routinely applied to agricultural properties. That verbiage was eliminated in the revised rule. The impact of this rule change appears to be unique to SWFWMD since the other water management districts do not have water use caution areas, do not always require metering when the threshold of this rule is tripped, and the metering condition can be removed if a parcel is sold to a different owner and the quantity falls below the metering threshold. For instance, SJRWMD allows estimates of the amount of water pumped. Feedback from the impacted stakeholders indicates the cost of meters, due to other considerations such as sleeving, is approximately \$5,000 per well on average.

Basis of Review (old)

2.1 (4) (Page B2-1) A water user shall obtain one permit for all withdrawals that are intended to serve contiguous property. For example, an agricultural operation that has four wells should apply for one permit. However, public water suppliers shall obtain a separate permit for each wellfield or other source, even though the wellfields may serve contiguous property. Applicants with multiple contiguous parcels in the same locale under their control may apply for one permit for water use encompassing all such parcels.

Revised

40D-2.041, F.A.C. Permits Required

(2) A water user shall obtain one permit for all withdrawals that are intended to serve contiguous property. Two or more properties represented to be separate properties shall be aggregated and treated as a single property for permitting purposes when the **District determines** that the properties are **physically proximate** and either (a) share the same irrigation infrastructure or (b) are operated as a **common enterprise**. However, when multiple use types, as defined in Rule 40D-2.501, F.A.C., are served by separate withdrawal facilities, the District is authorized to issue separate individual permits. This requirement to aggregate two or more properties shall not apply when the separate properties have existing individual permits that require metering for all withdrawals or the water user requests a permit modification to the permits to require metering for all withdrawals.

Internal coordination between divisions (Resource Management and Regulation) indicated that enough information is currently available through existing metering and other sources to accurately assess resource concerns throughout the District, including the Ridge area. In addition, the amount of data that would be gathered from combining these non-metered permits irregularly over the next 20 years would not improve the accuracy of this estimate. This rule mostly impacts the citrus industry, which is the most efficient of the larger crop types. Citrus accounts for a significant portion of the overall permitted agriculture use (see table). Citrus “withdrawn” quantities (184.1 mgd) account for 57% of agricultural withdrawals (324 mgd). The data below indicates the clear majority of permitted non-metered citrus is in the Bartow service area. This data is based on 2016 water estimates.

Item	Permitted	Metered	N-Metered	No. Permits	W - Points	Meter	N-Meter	Cost
Agriculture	753.5	572.8	180.7	5657	10257	6295	3962	\$19,810,000
Citrus	307	210.5	96.5	3806	6790	3724	3066	\$15,330,000
Total Citrus Non-Metered Individuals (NIG) 2884			Bartow Citrus NIG 2258			Polk Citrus NIG 1402		
Note: This data is approximate. \$5000.00 per meter is used as an estimated cost due to sleeving and other considerations. 96.5 MGD/2878 = approximately 35,000 gpd annual average per non-metered individual.								

Considerations

- Reliability of water estimates.
- Accurately identifying resource concerns.
- Creating a window to avoid metering requirements for permittees.
- This issue is unique to citrus and the Bartow service area. Out of the approximately 2,884 non-metered citrus individuals, approximately 2,258 of them are located within the Bartow service area.

Most viable option(s) to address concern:

- Initiate a rule change that sets parameters for when common enterprise is not applied:
 - ✓ Parcels under similar ownership separated by road maintained by a municipality.
 - ✓ Parcels under similar ownership that are separated by parcel under different ownership.
 - ✓ Less than three parcels under similar ownership with a contiguous boundary. Parcels subject to metering are not counted in this calculation.
- A non-retroactive rule that specifies from this date forward WUPs combined under this rule the metering requirement can be removed if the parcel goes under different ownership, falls below the metering threshold, meets other applicable criteria and obtains a minor modification.

V. Options to Address Non-Consensus Concerns

These issues did not receive a consensus among the stakeholders that were interviewed. However, due to the diverse aspects of the citrus industry, some of the comments were certainly relevant and have been included in this report. A brief acknowledgement of how these issues will be dealt with by the District is provided.

FARMS-Related Items

- ***Retaining a licensed Florida engineer on the FARMS staff***

Feedback received during the interview process included comments from private sector engineers suggesting projects be reviewed by licensed engineers to ensure quality projects are being funded. The FARMS Program currently has a senior P.E. on staff and has access to additional engineering resources both within the District and the NRCS as needed. FARMS staff currently utilize these resources during the evaluation process for large or complex project proposals to ensure quality projects are being funded.

No Action Recommended.

- ***Preference for local vendors for FARMS projects***

Feedback received from vendors during the interview process included several suggestions under this category. Those suggestions included offering a list of preferred vendors, requesting multiple quotes and requesting periodic inspections of precision irrigation BMPs. The concern was that some vendors are not offering the necessary follow-up services needed to ensure proper operation of water conservation BMPs after they are installed. The FARMS Program does not recommend vendors, products or consultants. Each project is developed by the applicant. We direct potential applicants to producers that have recently completed a similar project in hopes that the participating producer will share their experiences with applicants. We currently request multiple quotes and track project performance as part of the project development and implementation process.

No Action Recommended.

- ***Cost-share mainlines for CUPS projects***

Growing citrus under protective screens (CUPS) is an emerging practice aimed at combatting disease and producing fresh fruit to be sold at supermarkets. This involves significant infrastructure and is very expensive when compared to the per acre cost of traditional citrus production. Stakeholder input has suggested the current criteria used to evaluate potential FARMS projects does not offer reimbursement for the significant amount of irrigation lines required when developing a CUPS project. FARMS currently offer reimbursement for mainlines necessary to connect a new alternative water supply source to an existing irrigation system. CUPS projects typically involve the use of existing groundwater wells on site and the FARMS cost-share has been limited to reimbursing project components associated with precision irrigation. For example, automating pump stations with electronic controllers, automating irrigation valves, weather stations and soil moisture probes are eligible items for reimbursement under the FARMS Program. FARMS staff assist CUPS producers in obtaining other cost-share opportunities through the NRCS and FDACS to fund project components that do not currently qualify under the FARMS Program.

No Action Recommended.

- ***Cost-share rates specific to citrus (75 percent)***

The FARMS Program reimburses growers up to 50 percent for eligible water conservation BMPs. In some priority areas within the District the reimbursement rate may be increased to 75 percent. The FARMS Rule requires that producers contribute at least 25 percent of their own funds toward total project costs regardless of the reimbursement rate and outside funding sources. A significant number of citrus operations currently qualify for the increased cost-share rate, so it was not surprising that increased cost-share rates was not identified more often during the stakeholder meetings. Some stakeholders did suggest that the cost-share rate be increased to all citrus projects, at least on a temporary basis, until the industry gets a handle on greening. This will require approval by the Governing Board and may require a change to the FARMS rule. To avoid a rule change, the District has the option under the applicable statute to eliminate the FARMS rule.

No action recommended.

Non-Farms Related Items

- **Develop a communication effort to improve participation in the District's Water Use Permit advisory meeting using stakeholder feedback.**

The District will bring this item to its Agricultural Advisory Committee and request input on how to better structure these meetings to maximize participation from the agricultural industry perspective. In addition, staff will coordinate with the District's Communications Section to develop a messaging plan targeted at improving stakeholder participation.

Recommended action is outlined above.

- **Provide a one-time extension of the recertification requirement for agricultural permitted surface water management systems upon verification the system is functioning as designed**

This action was implemented by the District during the late 1990s due to Canker's economic impacts to the citrus industry. This action results in a reduction of expenses to permittees with surface water permit authorizations (i.e., MSSW and ERP). There are approximately 180 agricultural-related surface water authorizations. If a one-time waiver was provided that included verification by District field staff, assuming a cost of \$1,500 per recertification, the potential savings to the agricultural industry would be approximately \$270,000.

Recommended action is to implement extension.

- ***Develop a process that allows private consultants to participate in the AGSWM program similar to the USDA-NRCS Agreement***

The District has maintained a technical service provider agreement with the USDA-NRCS since 1990. If the USDA-NRCS or the District should ever want to end this longstanding successful agreement, the District will pursue contracting with the private sector to continue providing this service to the agricultural community.

No current action recommended.

Phase II – Implementation

A presentation was given to Executive on 11/27/2018 and the Agricultural Advisory Committee on 12/06/2018 by the CTF on the consensus and non-consensus items presented in this report. The work plan presented below identifies the items the District is working to implement. The work plan identifies milestones and an implementation schedule. The work plan was reviewed by the applicable bureau chief and approved by Executive (see Appendix IV). The District is committed to providing an update on its progress of this initiative to the Agricultural Advisory Committee at the 2019 summer meeting. In addition, the CTF team will communicate the progress of the CTF initiative to the citrus industry through various mechanisms that will include citrus and agriculture related media outlets. The target date for approving the messaging associated with this effort is January 15, 2019. A presentation by the CTF will be made to the District Governing Board in February of 2019 and any associated press releases and/or copies of the report will be made available at that time.



Appendix I

Communication Plan – Initial Outreach

Citrus Task Force Communication Plan

April 2018

Situation

Florida's citrus industry continues to suffer after Hurricane Irma ripped through Florida in September 2017 and devastated the current season's citrus crop. An estimated 80 percent drop in citrus production since the industry's peak (1997-98) is expected to continue to negatively impact citrus growers within the Southwest Florida Water Management District (District). As a result, the District's executive director is establishing a Citrus Task Force. This task force is an internal team of staff focusing on identifying what actions the District can take to support the citrus industry.

Background

The 2016 estimated permittee allocation for all agricultural uses within the District's 16-county service area is approximately 327 million gallons per day (MGD), which is 31 percent of the total permitted uses within the District (1,027.9 MGD). Citrus is the largest crop within the District, utilizing 57 percent (184.1 MGD) of the total agricultural allocated amount. However, citrus is one of the most efficient large production crops from a per acre irrigation allocation.

Florida's citrus industry is facing immense challenges. For perspective, 60 percent of all citrus production in the United States comes from Florida, bringing in \$1 billion in sales each year. Over the past decade, citrus related tree diseases have and continue to adversely impact tree health and harvest yields. In addition, Hurricane Irma resulted in losses to the Florida citrus industry that is expected to exceed \$761 million. This has resulted in the lowest crop yield for Florida's citrus industry since the 1940s. The citrus industry in Florida is facing unprecedented economic challenges.

Communication Challenges

- Citrus growers may not be familiar with the types of actions the District could take to aid citrus growers.
- There may be misperceptions about the actions the District can take to address citrus grower concerns as some actions may be limited due to regulatory constraints.
- Some citrus growers may not feel the District is doing enough to support the industry.
- Some District staff may be confused about the purpose of the internal task force.

Audiences

Internal Stakeholders:

- Executive Team
- District staff
 - Regulatory Division (Water Use Permitting; Environmental Resource Permitting)
 - Water Resources Bureau (Resource Evaluation and Water Supply)
 - Office of General Counsel
- Governing Board members
 - Bryan Beswick - lead

External Stakeholders:

- Associations (*Callie/Brian/Curt/Steve input will be taken when developing association list. This list is tentative and additional names may be added depending on the input received*)
 - Florida Department of Agriculture & Consumer Services (Callie Walker)

- Blue Goose Realty (Bryan Beswick)
- Florida Farm Bureau (Curt Williams)
- Peace River Valley Citrus Growers (Steve Smith)
- Florida Citrus Mutual (Andrew Meadows)
- IFAS – Laurie Hurner
- Florida Citrus Commission (Ellis Hunt)
- Haines City Citrus Growers
- Highlands County Citrus Growers Association (Billy Barden)
- Hillsborough County Agriculture Economic Development Council
- District’s Agriculture Advisory Committee
- Permittees (*tentative list – additional names may be added based on input*)
 - Mabry Carlton
 - Turners (Eugene/Philip)
 - Joshua Water Control District
 - Section 7 Grove (Alico, Inc.)
 - Valencia
 - Gardinier Florida Citrus, Inc.
 - Ben Hill Griffin – *FARMS*
 - Schroeder-Manatee Ranch - *FARMS*
 - Bright Leaf Nursery - *FARMS*
 - QC Groves – *FARMS*
 - Alico – *FARMS* – *David Kemeny*
 - Turner Hickory Groves – *FARMS*
 - Turner Citrus/Charles Lucas
 - Bright Hour Ranch – *FARMS*
 - Bentley Brahman Ranch – *FARMS*
 - Larry Black – Flying V, Glovers, Windy Hill, etc.
 - Tamiami Citrus LLC (Ed Leotti)
 - CUPS, Ed Pines – Polk County
 - CUPS, Circle H Citrus - George Pantusso
 - Lake Wales – Pat McKenna
 - Smoke Family Consolidated Citrus
 - Bethel Farms – Jonathon Brown
 - Joel Davis – Hardee County
 - Brian Belcher – Hardee County
 - Lipman
- Consultants (*tentative list – additional names may be added based on input*)
 - Eco Consultants –*Alec Hoffner/Chris Bryant*
 - PWR – *Dave Brown*
 - Tris Est Irrigation
 - Harplyn, Inc.
 - AgTronix
 - Agriservices, Inc.

- Phil Nathan
- Stantec (Quince Sellers, etc.)
- Gary Bethune
- Gaydos Consulting (Dana)
- Mitch Walker – PRO MIL
- Danny Packs – Packs Brother Irrigation
- David Imhoff – Florida Grove and Home

Goal

- To provide support to the citrus growers and associations within the District.

Objectives

- To conduct outreach to various citrus growers and associations and solicit feedback on the challenges they are facing and identify how the District can assist them through our permitting and funding processes by July 1, 2018.
- To review past and current practices, policies and procedures to reduce or eliminate actions the District has taken that negatively impacted the citrus industry without compromising the District's commitment to protecting Florida's water resources by October 1, 2018.

Methods

- Emails
- Face-to-face meetings
- Feedback form
- Information in citrus associations' publications and electronic communications
- Meetings with stakeholder groups
- Meeting summaries
- Online meeting with stakeholders to solicit input on District's recommendations/findings
- Outlook meeting notices
- Report with findings and recommendations
- Telephone calls

Communications Activities, Responsibilities & Timeline

Target: Solicit feedback from the citrus industry on how the District can assist them through their regulatory and funding programs

Tasks

- Develop association list to conduct outreach
- Conduct external meetings

Target: Develop permittee list to conduct outreach

Tasks

- Chris Z. provide top five permittees involved in FARMS
- April B. provide top five permittees in over pumpage
- Mark L. provide top five permittees that are industry leaders
- Develop over all list and conduct external meetings

Target: Develop consultant list to conduct outreach

Tasks

- Chris Z. provide top three consultants involved in FARMS
- April B. provide top three consultants involved in compliance
- Mark L. provide top three consultants involved surface water authorizations
- Develop overall list and conduct external meetings

Target: Based on input received from external stake holders develop recommendations and tactics to address concerns then obtain consensus on methods to address concerns from management and divisions prior to delivery to executive.

Tasks

- Produce recommendation report - **Ross lead.**
- Internal Coordination (Resource Management, OGC, and Regulation)
- Approval – management/executive
- Implement recommendations and communicate results of external stakeholders

Work Products

- Meetings summaries of external meeting (e.g., bullet lists, participants, date/location). This includes face-to-face or outreach conducted over the phone.
- Recommendation report – The report will include methods to address concerns or reasons why the concern cannot be addressed.

Communications Phasing

- **First phase** is to conduct external meetings with external stakeholders.
- **Second phase** is to develop recommendations within the task force that concerns received during external outreach.
- **Third phase** is to meet with internal stakeholders to build consensus on recommendations and applicable division heads (e.g., OGC, directors, etc.).
- **Fourth phase** is to produce a recommendation report and seek approval from executive to implement.
- **Final phase** is to communicate results to external stakeholders.

2018 General Timeline

While most activities will be ongoing, the chart below indicates milestones necessary to complete objectives timely.

Tasks	April	May	June	July	Aug	Sep	Oct	Nov	Dec	Jan
Develop Association List										
Develop Permittee List										
Develop Consultant List										
Approval of Outreach										
Conduct Outreach										
Conduct Internal Coordination										
Coordination Director/BC/Manager										
Coordination Executive Team										
Ag Advisory Committee Meeting										
Develop Implementation Schedule										
Finalize Report										

Citrus Task Force Communication Aides
April 2018

Media – Citrus Associations (Communications approved)

The following communication will be provided if requested by the associations for inclusion in their media distribution:

- *In response to the tremendous losses the citrus industry is facing due to greening and Hurricane Irma, the Southwest Florida Water Management District (District) is soliciting feedback from citrus growers on ways the District can assist them during this critical time. The District has formed the Citrus Task Force to listen and solicit feedback from the citrus industry on the challenges they are facing and how the District can assist them through permitting and funding processes. Based on the input we receive, the task force will develop recommendations the District can implement that will assist the citrus industry without compromising the District's mission to protect the water resources. Please send any ideas, concerns or thoughts to the District's Ombudsman, Ross Morton, at ross.morton@watermatters.org by May XX, 2018.*

Meeting Talking Points (e.g., phone, etc.)

Objective: Conduct outreach to various citrus growers and associations and solicit their feedback on the challenges they are facing on how we as an agency can make changes that can assist them through our permitting and funding processes

Please note: We may be limited on what we can do as regulatory agency due to regulatory constraints, but we want to hear your concerns, thoughts, and/or suggestions.

1. Have you had any interactions with the District in past couple of years (e.g., WUP renewal, AGSWM, FARMS, Compliance, data submittals, etc.)
 - If so, how was your experience (very poor, poor, average, good, very good, excellent)
 - Customer service
 - What did the District do well?
 - What frustrates you about the District.
2. Do you have any suggestions that could assist your entity when dealing with matters involving the District.
 - AGSWM (e.g., any surface water type authorizations, exemptions, etc.)
 - WUP Renewal
 - FARMS
 - Compliance

External Meeting Agenda Template

**Citrus Task Force
Agenda
Date/Time/Duration
Location**

Attendees:

- Introductions
- Objective of the Citrus Task Force
- Overview of their Operation
- Activities they interact with the District
- Can the District can improve its customer service?
- Areas where the District can assist the grower
- Concluding thoughts

Appendix II

Meeting Summaries

Meeting Summary

Ag-Tronix

06/29/2018 @ 10:00 to 11:00

Attendees: Sonya Lee, Ronnie Ford, Carole Estes, David Brumbaugh and Chris Zajac

Industry Challenges:

- Diseases
- Cost share available for new technologies

Problem Areas for SWFWMD to Consider

WUP

- Metering – consider cost sharing automatic meter readers. As long as it does not hindrance the grower from using the same meter with automation.
- Metering testing – consider cost share for meter calibration
- Metering – consider using a radio system rather than cellular due to security challenges

FARMS

- Get 2 quotes
- Consider cost differences between valves, for example, size, hydraulic control, radio control, etc.
- Consider cost share rates for automation, varies depending on components, recognize small farms cost roughly the same to automate as large farms
- Contract – shorten contract itself and get contract executed faster, like FDACS
- Consider rewarding good cooperators with faster and shorter contract
- Consider secondary benefits such as reduced fertilizer and pesticide use
- Increase the cost/1,000 gallons saved criteria used to evaluate automation/electronics projects
- Consider increasing cost share rate for the Mini-FARMS Program
- Consider checks/balances to see if the vendor's equipment is working properly during the 5-year contract. Is the project/grower getting what was promised? Is the vendor supporting the equipment and project in year 4 or 5? This would eliminate bad vendors that were there for the easy sale.
- Consider smart controllers (monitoring) a key value in cost share projects instead of a timer type clock that you actually do not know if it is working.
- Consider preference of vendors that are trained authorized representatives of control systems/equipment that are supported locally in Florida instead of systems that have no local support for the growers.

Meeting Summary
Alico
Email Correspondence 09/06/2018 12:44 PM
Alico: Danny Sutton
District: Mark Luchte

Danny Sutton: The ones I highlighted are the ones that I strongly agree with. I added a bit to some for clarification. I can't say that I disagree with any of them but would strongly support the ones italicized and in bold.

Water Use Permitting (10):

- ***Account for newer tree density practices within AGMOD*** and the changes in root systems as a result of greening
- ***Lessen frequency of meter calibration*** possibly from 5-10
- ***Stop combining non-contiguous Small General WUPs***
- Quarterly meter reporting instead of monthly
- Simplify data reporting
- Frequency of SWUCA credit reloading
- Don't penalize for no use due to abandonment period
- ***AGMOD's allocation on the ridge too low***
- Better acceptance of other allocation models like AFSIRS
- ***Consistency in compliance – run actual rainfall data when over-pumping scenarios occur***

FARMS Cost Share Program (7):

- Greater cost share for efficiency improvements
- Adjust the cost share benefit analysis (\$/1000 gal saved)
- Streamline the application process
- Quicker reimbursement after Governing Board approval
- ***Fund voluntary conversion to Automated Meter Readers (AMR)***
- ***Greater outreach efforts and public awareness of programs***
- Increase Mini-FARMS funding

Surface Water Authorizations (1):

- Flexibility in converting some old MSSWs/ERPs to AGSWM style exemptions (less pond recertifications)

Other (2):

- Increase SWFWMD ag team staff; Service Office Ag teams including WUP staff outside of Tampa
- Maintain District staff ag expertise & have a succession plan

**Correspondence
Ben Hill Griffin**

September 17, 2018

Southwest Florida Water Management District

Attention: Ross Morton

Reference: SWFWMD Policy Meeting with Ben Hill Griffin, Inc.

Ben Hill Griffin, Inc. Participants: Emery Smith, Will Brown, Ben Hill Griffin, IV, Steve Farr, and Rich Thayer

Mr. Morton,

Thank you for all your work with this subject. I have written down our main thoughts on how SWFMWD and how the Citrus industry's relationship could be improved.

SWFMWD policies that burden Agriculture

- AGMOD is a great tool during the permitting process. However, the system needs modifications dealing with smaller root zones, new tree planting densities, and specific ridge conditions. AGMOD was written before Greening changed practices. This devastating disease has dramatically changed the citrus industry procedures and planning. Increased water usage for liquid fertilization and tree stress have been major recent changes.
- New permit meter combination for permits with less than 1 OOK use per day, and then adding mandatory meter requirement issues is a major financial hardship in a troubled industry.
- The term "Common Enterprise" to trigger a meter requirement is inconsistent interpretation of how SWFWMD has practiced this vague rule in the past.
- Growers should not be penalized when "subject of interpretation" is used. Why does SWFWMD side with the harsher interpretation instead of working with Agriculture?
- Small groves are often sold. The properties sales value is not increased by a meter requirement and complicates the sales process. The data collected doesn't warrant the grower's expenditure and is not economically feasible.
- SWFWMD changed the rule regarding combining permits without consideration of numerous financial impacts.
- Transferring a property should not trigger an automatic permit combination or meter requirement until the Water Use Permit renewal time especially with two independent irrigation systems.
- Terms such as physical proximate, common enterprise, district determines. Then adding, and, or, or either statements further complicates these rules and interpretation.
- Five year mandatory meter calibrations are expensive, and should be pushed out to ten years and realistic based.
- Drought condition flexibility - procedures to recognize irrigation pattern climatic changes, and work within our years rolling average to balance out usage without credit deductions.
- Allow quarterly meter readings like SFWMD. Cost share AMR which reduces paperwork, data entry intervals, and captures data more accurately over time.
- Data entry system has numerous flaws with meter reporting, crop protection, and renewals.

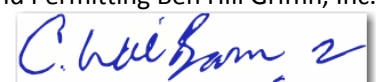
Industry Challenges

- Diseases, land usage, weather, trade wars, profitability, and government regulations.
- Production cost increases while profitability has been greatly reduced over the last decade.
- Stop consistent District updates to rules without proper interpretation or dialog with users.

FARMS and Agricultural Knowledge

- Need to energize the WUP and ERP advisory committees to discuss policy changes.
- Numerous rule and interpretations issues have created growers' financial hardships over the last decade, and these changes were without approval of the governing board.
- Staff local SWFWMD hydrologist at each office that are knowledgeable with regional geology, resources, and community issues. There is a growing lack of familiarity and solidarity between the Permittee and district staff.

Sincerely,
C. Will Brown, Jr.
Environmental and Permitting Ben Hill Griffin, Inc.



Meeting Summary

Carlton Farms

06/07/2018 @ 12:00 to 1:30

Phone: Lisa Carlton (941 809 2181), Barbara Carlton (941 322 1135), & Matt Harrison (863 990 1777)

Phone call Initiated by: Ross Morton

General Comment:

Overall the District has done a nice job with improving its image over the past ten years and we recently had a pleasant experience during the last WUP renewal.

Industry Challenges:

- Tree Diseases and recent hurricane damage
- Lack of production due to tree diseases and the increase in the amount of money involved in producing a successful harvest

Problems Areas for SWFWMD to Consider

WUP

- Meter calibration frequency – changing to a frequency of 5 to 10 would reduce costs to the grower
- Online data monthly reporting makes it easier, but it may not be the most user friendly or intuitive
 - It takes more effort to report a well not in use versus one the is active.
 - Crop reporting can be burdensome from an entry standpoint.
 - ***May want to consider a feature where you only have to modify what has changed during the renewal and/or the data entry process.***
- For operations with a small number of wells monthly reporting is not problematic. However, funding to assist entities in upgrading from a manual system (traditional meter) of reporting to AMR would likely be well received and reduce daily operating costs associated with data collection and entry.
- Workshops on the District electronic data entry system and/or hands on training would assist the permittee.
- If permittee is within AGMOD using actual rainfall and credits have been exhausted, the District should not pursue enforcement against a grower.
- The District should be careful not to reward use over conservation. Due to economic burdens the citrus industry is experiencing, lack of use should not equate to a loss of allocated quantities. Lack of use by existing citrus permittees should be viewed as a temporary economic condition and that water is being conserved.
- Citrus credits should be more transparent in order for permittee to be aware when credits are being consumed in order to avoid over pumpage.

FARMS

- Have not engaged with FARMS personnel recently concerning funding opportunities. Maybe interested in setting up a meeting to discuss potential projects. For instance, even if funding is not available for upgrading meters to AMR it may be helpful to discuss the benefits and technical aspects of the upgrades.
- Decreasing the cost benefit requirements for upgrades to conservation through efficiency and increasing the cost share to 75% percent in light of the industry economic challenges may increase interest in the citrus industry.

Surface Water

- Maintain commitment to the local and regional ag teams. Make sure there is a level of ag expertise and understanding that ag permittees can rely on especially during WUP reviews.
- Lack of access to local regulation personnel is concern for maintaining working relations between agricultural and the District's regulatory personnel, especially in light of the extended permit durations and expected retirement of District staff with extensive agricultural experience.
- Maintain flexibility and common sense in evaluating proposed surface water authorizations (e.g., permits, AGSWM, other exemption, etc.).

Meeting Summary
Citrus Under Protective Screen
06/28/2018 @ 10:00 to 11:00

Attendees: Ed Pines, Steve Callahan, Justin Martin, Matt Vinzant and Chris Zajac

Industry Challenges:

- Diseases
- Tree availability for replanting
- Cost share available for new technologies

Problem Areas for SWFWMD to Consider

WUP

- Metering – producers are very busy, some operations have staff assigned to metering. Consider cost sharing automatic meter readers
- Metering testing – Consider cost share for meter calibration
- WUP – consolidating WUPs affects grove owners' business plan

FARMS

- Consider cost sharing mainlines, particularly for CUPS projects
- Continue to offer face to face assistance to FARMS participants applying for cost share
- Consider increasing cost share rate across the board for citrus at 75%, like FDACS cost share rates
- Contract – shorten contract and get contract executed faster, like FDACS
- Research needed to show the effectiveness of CUPS, water conservation benefits
- Consider secondary benefits such as reduced fertilizer and pesticide use
- Increase the cost/1,000 gallons saved criteria used to evaluate automation/electronics projects

Meeting Summary
Danny Packs – (Packs Brother Irrigation)
August 2, 2018 – 3 PM
Phone Call (863)673-0264

Phone: Danny Packs
District Staff: Ross Morton

Industry Challenges:

- Lack of irrigation knowledge as it pertains to setting up, evaluating, and utilizing an efficient and effective system

Problems Areas for SWFWMD to Consider

WUP

- Water use permits can be extremely administrative
- District personnel are nice but have a lack of irrigation knowledge. Often try to squeeze quantities from the grower without understanding the consequences and/or the irrigation requirements of the trees.
- Lack of flexibility of working through agreements and/or lack of common sense. For instance, pumps were not installed but required to install flow meters
- Overall, they do a good job considering the resource and environmental concerns they are required to regulate.
- Reduce calibration requirements.
-

Surface Water

- District should maintain ag teams and advertise them better as resource that can be utilized by the public.

FARMS

- Contracts too lengthy and complicated.
- Entire process is too lengthy. From beginning to end takes over a year, best case scenario.
- More flexibility on cost estimates. For instance, plastic tubing is extremely difficult to estimate due to the volatility of the petroleum market.
- Surface water pond estimates needs to be more flexible. This gets back to lack of irrigation knowledge and the necessary requirements/components.

SWFWMD Citrus Task Force

Meeting Summary

Eco Consulting - Location: 1523 8th Avenue West, Suite B, Palmetto, FL 34221

July 19, 2018 - Time: 11 AM to Noon

Attendees: Mark Luchte, Ross Morton, Edward Craig, and Chris Bryant

General Comment: Overall the District does a good job in providing quality customer service. However, in more than one instance we have experienced a feeling of animosity directed at our firm from District personnel when dealing with regulatory issues on behalf of a client.

Industry Challenges:

- Tree Diseases
- Marginal cost increases (i.e., tree density increases, herbicides, hurricane damage, production declines, etc.)

Problems Areas for SWFWMD to Consider

WUP

- Meter calibration requirements – reduce frequency from every 5 to 10
- Credit transparency, inability to determine if credits are being consumed, reloading should be on the lowest permit renewal of 6 years.
- AGMOD needs to be updated to account of ridge (District own analysis indicates AGMOD under allocates), increase in tree densities. AGMOD is not always the best tool to use in estimating the approximate water allocation. District staff need to be more aware of that, especially with citrus on the ridge. That includes establishing preferences of one model over another through the rule.
- Compliance should only be pursued if credits are consumed and based on actual rainfall the permittee is exceeding AGMOD allocation. District should reinstate previous IOP that established that guideline.
- Be more transparent with permittees on what the reduction of allocated quantities will mean for future ag related activities (i.e., MIA, Verna Well field, etc.).
- Existing permits should be evaluated on their permitted impacted not on actual use when relocating quantities. That evaluation comes in on reasonable and beneficial. There is confusion on how that is applied by the District reviewers.
- Inconsistency on District review of acreage review and use of soils in AGMOD. Staff do not seem to be aware that AGMOD reduces quantities by 10 percent, and then staff try to carve out additional minuscule acreage.
- The District needs to understand that citrus is experiencing tremendous hardships. Lack of use over an extended period (i.e., ten to twenty years) and the need to change to a different crop type should be carefully considered before a reduction in allocated quantity is contemplated. For ag to stay viable they need to be able to adjust to a changing market and conditions (e.g., cure to tree diseases) and have sufficient allocated quantities to adjust accordingly.

FARMS

- Decreasing the cost benefit requirements for upgrades to conservation through efficiency and increasing the cost share to 75% percent in light of the industry economic challenges may increase interest in the citrus industry.
- Streamline contract approval process and speed up reimbursement process.
- Develop a mini FARMS process with cap of \$15,000.00 for conservation related efficiencies.

Surface Water

- Maintain commitment to the local and regional ag teams. Make sure there is a level of ag expertise and understanding that ag permittees can rely on especially during WUP reviews.
- Lack of access to local regulation personnel is concern for maintaining working relations between agricultural and the District's regulatory personnel, especially in light of the extended permit durations and expected retirement of District staff with extensive agricultural experience.
- Maintain flexibility and common sense in evaluating proposed surface water authorizations (e.g., permits, AGSWM, other exemption, etc.).

Meeting Summary
FARM Bureau – Lake Wales Outreach
06/06/2018 @ 1 to 3 PM
100 West Stuart Ave, Lake Wales Florida

SWFWMD: Mark Luchte, April Breton, and Ross Morton

Ag Representatives: Larry Black, Corry Myers, Ed Lassiter, Deeley Hunt, Kyle Story, and Curt Williams

General Comment Concerning SWFWMD

- In general, growers feel the District is working with them, however, the District needs to understand their economic stresses and where possible make adjustments.

Industry Challenges:

- Disease and other related factors have drastically reduced productivity
- Citrus farming has changed from a 145 tree per acre to 500 plus trees per acre
- Hurricane Irma and associated production losses

Problems Areas for SWFWMD to Consider

WUP

- Reporting – Monthly versus quarterly - Is a burden and cost in labor to the grower
- Frequency of meter calibration requirements. Life of the meter is usually ten years.
 - District may want to consider funding the difference between a basic meter and AMR meter. This would eliminate the economic cost of quarterly vs. monthly and provide the District with more accurate and timely data. How much does the District spend per year in tracking down this data or conducting compliance on obtaining this data?
- Combining of <less of 100,000-gallon permits and associate metering requirements
 - Use of the term common enterprise as a trigger to require metering is incompatible with how the citrus industry has managed these properties in the past.
 - It is economically important for these small properties to be sold without the metering requirement being triggered when the irrigations systems are not linked, and they are not managed as one property vs. a saleable asset.
- Flexibility in drought years when credits are consumed but staying within AGMOD quantities. Develop procedure that recognizes that flexibility to ensure consistency of application.
- Drought credits – complicated concept- not being understood in manner that promotes conservation – frequency of “loading credits” is every ten years - may want to shortest permit renewal time - 6 years.

FARMS

- Unless surface water is utilized, technology upgrades often do not provide the cost benefit analysis to qualify. Establish a cost benefit parameter specific to Citrus that encourages the utilization of technology to reduce water consumption.
- Increase cost share of citrus related projects.
- Reduce the administrative aspects associated with the FARMS application process and speed up the delivery date of the reimbursement.
- Agreement forms for FARMS too long and too many loops compared to FDACS
- Fund AMR metering or at least the difference between AMR and a regular meter – If the District wants data monthly and the other districts are at 1/4ly, provide funding incentive.

Agricultural Teams/Institution Knowledge in Agriculture

- Maintain flexibility of the surface water permitting program to ensure institutional knowledge is maintained in the regional team. Consider reestablishing the local ag teams to ensure institutional knowledge is sustained into the future.

Meeting Summary
Florida Department of Agriculture
05/07/2018 @ 10 to Noon
1085 Pratt Blvd. Labelle FL

Attendees: Callie Walker, Chris Zajac, Mark Luchte, April Breton, and Ross Morton

General Comment Concerning SWFWMD

- What sets SWFWMD apart from other regulatory agencies is there willingness to assist permittees through non-compliance situations.

Suggestions for Outreach

- Add Lipman and Lipman

Industry Challenges:

- HLB Greening - Production Costs at an all-time high
- Hurricane Irma – southern portion of the State (Collier, Lee, etc.) - flooding, wind stress – 60 to 70 percent crop loss
- \$760 Mil in funding from FSA and additional \$340 mil from a block grant. Based on production losses from greening and other diseases tree planting and resets likely to go from 140 per acre to over 500 for fresh and juice orange production. **May need to increase allocation in AGMOD.**
- Development of resistant varieties likely over 7 years away (1 to 2 years to provide stock and 5 years to provide decent production).
- Black spot in groves – May result in a need for **additional allocation** due wetting of the leaf litter to increase decomposition

Problems Areas for SWFWMD to Consider

WUP

- Loss of quantities if groves are temporarily abandoned
- Combining of WUP rule for small generals under same ownership but not integrated through an irrigation system
- Accessing permit information as compared to the other Districts
- Meter calibration requirements – \$600 dollar per meter
- Reporting – Monthly versus quarterly and frost freeze – Compromise with monthly reading but ¼ reporting

FARMS

- More face-to-face outreach by staff with the growers – outreach/workshops
- Agreement forms for FARMS too long and too many loops compared to FDACS
- The amount of time it takes to get to a signed contract is way too long as compared FDACS
- Engineer design costs not reimbursable even though a key component of any successful project - FDACS reimburses 100 percent of design costs.
- Increase cost share
- Fund AMR metering or at least the difference between AMR and a regular meter

Agricultural Teams/Institution Knowledge in Agriculture

- Succession planning -maintenance of regional and reestablishment of local teams to ensure institutional agricultural knowledge is maintained within SWFWMD

MIL

- Expansion of the Mobile Irrigation lab and prioritizing the citrus industry

Meeting Summary

Gary Bethune, P.E. (with first person comments)
07/19/2018 @ 9:00 to 11:00
Palmetto

Attendees: Gary Bethune, Mark Luchte

Industry Challenges:

- Diseases
- Higher Planting Densities & Shorter Tree Life
- Higher production costs
- Relocation pressures
- Weather
- Foreign competition
- Steadily increasing number of WUCAs, MFLs, and stressed lakes
- Competition for water with stressed lakes and public supply
- 0.049-ft drawdown limitation to MIA, WUCAs, and Verna wellfield
- Hardwired WUPs with individual wellhead allocations are not flexible and can cause wellhead exceedances

Problems Areas for SWFWMD to Consider

WUP

- System of sending delinquency notices in WMIS is inaccurate and ultimately causing friction between the SWFWMD, the agricultural community, and the consultants; e.g., 1. I repeatedly get notices on projects I'm not involved in, 2. In June-2018 a client received a delinquency notice even though data was uploaded. Staff's email response was "This is a lingering issue since our old system is still active in the background. Our IT is aware of the issue and is working to resolve it as quickly as possible. I have sent the issue to our IT Support for them to manually fix this one so future readings will be accepted." I suggest holding all delinquency notices until the bugs are worked out of the system.
- Disparity & inequity between parcels when applying rules and delinquency letters, e.g., it's frustrating for the grower/farmer and consultant to see some WUPs receive delinquency notices within 30-days of a due date and other WUP go for YEARS without receiving any notices for the same delinquency.
- AGMOD doesn't take into account the new planting densities nor new irrigation system layouts, e.g. additional number of micro-sprayers on high-density groves
- Staff is uncooperative and antagonistic when I have pursued other irrigation allocation methods like AFSIRS which will be allowed in the CFWI region by 3 WMDs, e.g., it took 17-months for staff to acquiesce to a 9-in blueberry root zone from AGMOD's 48-in root zone and issue WUP – all the while blueberry plants sat in 1-gal containers with their roots girdling.
- Credits unable to be transferred in MIA from one grove/owner to another without discounting lack of pumpage due to citrus greening abandonment
- SWUCA credits should be reloaded at least 3 times during a 20-year WUP life.
- Consider quarterly pumpage data instead of monthly reporting, e.g. like SFWMD
- Reduce meter calibration frequency and accept 10% accuracy, e.g., like SFWMD
- Reward growers found to be in consistent compliance with less reporting and penalize growers found to regularly be out of compliance with more frequent reporting.
- Insert actual rainfall into AGMOD to check predicted allocation needs when groves are found to be out of compliance and out of credits.
- In the WUP review, PGs should be recognized and relied upon as experts in the movement of groundwater and Agricultural Engineers should be recognized and relied upon as experts in the areas of surface drainage, surface water supply sources, consumptive use, and irrigation design.
- Voluntary cost-shared AMR option
- Craft WUPs that have wellhead flexibility

- The District should be consistent in professional services it provides for free and when permittees must pay for them, e.g. groundwater modeling on some >1 MGD WUPs, submitted by the permittee, is typically performed by staff; conversely, groundwater modeling was required on 0.029 MGD WUP I submitted. Same criterion (staff performed vs consultant performed services) should also apply to surface water modeling.

FARMS

- More P.E. involvement. Either hire a FARMS staff Agricultural Engineer or subcontract a private Agricultural Engineer to review all proposed FARMS projects. The P.E. would check irrigation system layouts, pump sizes, pipe sizes, filters, control structures, etc. in order to avoid over-designed components and over-payment of tax dollars, e.g., - 1. I've seen numerous FARMS irrigation designs done by pump/pipe salesmen that do not meet standard engineering practice and waste the public's money, and 2. I've seen numerous FARMS tailwater recovery pond designs based upon having adequate water during a freeze event but no consideration of the ponds annual average yield - the result is that ponds do not meet projected annual average offsets – another waste of the public's money.
- Moving spoil to and offsite location under separate ownership should not be a 50% penalty to grower/farmer's cost-sharing contribution e.g., this penalty resulted in a farmer abandoning a proposed FARMS project submitted to the District for a 2-MGD groundwater offset in the MIA!
- Since FARMS does not have an Agricultural Engineer on staff, they should rely on other Agricultural Engineers (District or consulting) when making determinations as to whether or not something can function as a water conservation BMP, e.g., staff's long-term refusal to consider sub-surface drainage for rainwater harvesting and reuse.
- Not following their own guidelines (Model Farms etc.), e.g., 1. - staff's long-term refusal to cost share blueberry micro-irrigation, even though it was listed as a FARMS cost-sharable BMP, resulted in a frustrated grower abandoning FARMS participation.
- The District should require liquidated damages on underperforming FARMS projects – that would put a stop to those projects that consume MORE groundwater after constructing a FARMS project than they did before FARMS participation.
- District should abandon FARMS cost share percentage approach and fund projects on the basis of their cost of groundwater offset – that is to say fund projects based on the public's cost for saving groundwater – whether they are public supply desalination projects or farm/grove projects – spend public dollars wisely and get the biggest bang for your buck.

ERP

- NRCS has design constraints that limit innovation. Private consultants do not.
- Open the AGSWM Agreement reimbursements payments to private consultants.
- Hire an outsourced P.E. to resolve compliance and complaint disputes
- In the past, AGSWM program had less flexibility yet provided better consultant guidance and consistency
- Multiple AGSWM Teams should be re-instated for better customer service
- More flexibility in converting old agricultural MSSWs & ERPs to AGSWMs or other authorization, e.g., staff's refusal to convert an MSSW storm water pond to vegetated filter-strip resulted in farmer having to excavate five silted-in MSSW ponds at a cost of over \$60,000.

Meeting Summary
Joshua Water Control District
August 3, 2018 – 10 AM
Phone Call (863)494-5737

Phone: Dana Clements -Joshua Water Control District (WUP) 2386
District Staff: Ross Morton

Industry Challenges:

- Diseases
- Hurricanes
- Volatile markets

Problems Areas for SWFWMD to Consider

WUP

- Meter calibration requirements – cost roughly \$300 to 400 per meter. We have over 86 meters and the cost was over \$28,000.00. 5 to 10 years would be a great economic help
- Data entry is horrible due to the recent whole sale changes to the system that we were told would make it easier
 - System wasn't ready when told to utilize
 - Should have an option (e.g., crop reports, wells not in use, etc.) to hit "nothing changed" and only be required to submit information that has changed.
 - Constant errors and they are the District's system and not user error
 - However, despite how horrible the system is the District has great personnel assisting us, of particular note is "Mary Ellen".
- Monthly to quarterly reporting would not help us and actually be more problematic based on the District's data entry system. It may help if meter reading was also only quarterly and then averaged out.
- AMR would be great. Funding the difference maybe the only way it would be implemented for our operation due to how Joshua Water Control District is managed and the various ownership issues.

Surface Water

- Loss of experienced ag personnel a huge concern. However, due to our size we have consultants who represent our interests. Get calls all the time from smaller growers who rely on the expertise of the District agriculture teams.

FARMS

- Great program. Participated through our consultant on a couple of projects.
- Contract lengthy and not user friendly
- Moving forward do not see an incentive to pursue further FARM projects
- Encourage you to meet with our consultant David Brown and get his perspective.

Meeting Summary

Land and Water Resources for Living Systems - Philip Nathan, P.E.
07/17/2018 @ 10:30 to 11:45
Sarasota Service Office

Attendees: Philip Nathan, Mark Luchte, David Brumbaugh

Industry Challenges:

- Diseases
- Competition for Water with Stressed Lakes and Public Supply

Problems Areas for SWFWMD to Consider

WUP

- Consider quarterly pumpage data
- Reward growers found to be in consistent compliance with less reporting and penalize growers found to regularly be out of compliance with more frequent reporting.
- Insert actual rainfall into AGMOD to check predicted allocation needs when groves are found to be out of compliance and out of credits.
- Voluntary cost-shared AMR option

FARMS

- More P.E. involvement. Either hire a FARMS staff P.E. or subcontract a private P.E. to review all proposed FARMS projects. The P.E. would check irrigation system layouts, pump sizes, pipe sizes, filters, control structures, etc. in order to avoid over-designed components and over-payment of tax dollars.

ERP

- Open the AGSWM Agreement reimbursements payments to private P.E. consultants.
- Hire an outsourced P.E. to resolve compliance and complaint disputes
- Go to 5 years for old MSSW/ERP recertifications

Meeting Summary

Premier Citrus Management - 05/02/2018 @ 9:30 to Noon
3990 NE 4 Mile Grade, Arcadia, FL 3266

Attendees: Bryan Beswick, Chris Zajac, Mark Luchte, April Breton, and Ross Morton

General Comment Concerning SWFWMD

- District FARMS staff are great to work with; however, I am concerned the District moving forward will not have a succession to plan to ensure personnel are knowledgeable about agriculture and can think “out of the box”.

Suggestions for Outreach

- Captured in the communication plan

Industry Challenges:

- Diseases and potential fixes. To get a successful resistant variety may take up 7 years to get any production if discovered today. Technology and other types of solutions will be what makes or breaks the industry.
- Competition for non-domestic suppliers who have an unfair advantage as compared to the regulations US citrus industry has to contend with.

Problems Areas for SWFWMD to Consider

WUP

- Monthly versus quarterly. I have 28 wells and it takes an entire day to read the meters not to mention the data entry portion.
- SWFWMD data entry is not intuitive as compared to other systems. Even if it is a user error on our part, other Districts have more user-friendly data entry systems.
- Combining of small generals that possess non-integrated irrigation systems that result in tripping the threshold in requiring a meter. The District did not understand the economic impacts they had on the industry, and the value these parcels have in remaining non-metered and separate when the “administrative rule change” was implemented in 2012.
- Credit is a convoluted process and is not something growers understand how it benefits, how it is applied, and/or reloaded.
- Crop protection reporting is problematic. Relates to ease of entering data and the labor associated with reading the meters on large operations that I manage. District may want to consider making AMR an economic and feasible option for citrus growers.
- Belief that AGMOD does not consider the new tree density layouts and is particularly stringent on the ridge.
- Crop protection duration is inconsistent between reviewers (12 vs. 24 hours)
- Many growers incorrectly believe that using surface water cannot cause an overpumpage scenario.

FARMS

- Increase the cost share amount and increase the scope of what qualifies for reimbursement. The use of technology in battling tree diseases is the short-term answer for sustaining this industry
- Fund AMR for citrus or at least the difference when replacing a meter.
- FARMS contracts are too complicated as compared to FDACS. They should be streamlined
- Once a FARMS project is approved by the Board, contracts should be executed within 30-45 days.
- Increase cost share for Mini-FARMS. For instance, pump shut off technology costs up to \$15 grand per well, increase to at least \$20 grand.

Agricultural Teams/Institution Knowledge in Agriculture

- Succession planning -maintenance of regional and reestablishment of local teams to ensure institutional agricultural knowledge is maintained within SWFWMD

Surface Water Authorizations

- For recertifications for permitted groves waive the requirement of having a P.E. certify its operation if District staff concur based on field observations it is functioning as designed.
- AGSWM - If net water quality is improved, allow for greater flexibility in replacing previous surface water authorizations with AGSWM

Meeting Summary

Peace River Valley Citrus Growers Association

05/17/2018 @ 9 to 11 AM

Hardee Ag Civic Center – 515 Civic Center Drive, Wauchula

SWFWMD: Mark Luchte, April Breton, and Ross Morton

Peace River Board of Directors: Steve Smith, Rick Turner, Callon Buddy Keen Jr., Jonathan Brown, Wes Soria, Ashley Schafer, Lynn Shelfer, Lenny Lempenau, and Efran Schraeder

General Comment Concerning SWFWMD

- In general, growers feel the District is working with them

Industry Challenges:

- HLB Greening - Production Costs at an all-time high
- Hurricane Irma and associated production losses
- Equipment costs due to federal requirements

Problems Areas for SWFWMD to Consider

WUP

- ***Difficulty in inputting pumpage data. System overall not user friendly***
- Reporting – Monthly versus quarterly - Is a burden and cost in labor to the grower
- Frequency of meter calibration requirements – \$200 dollar per meter – SJRWMD only requires ten years, which is about the life of the meter for this area.
- In ability to submit renewal application. Too complicated.
- Flexibility in drought years when credits are consumed but staying within AGMOD quantities. Develop procedure that recognizes that flexibility to ensure consistency of application.
- Drought credits – complicated concept- not being understood in manner that promotes conservation – frequency of “loading credits” is every ten years - may want to shortest permit renewal time - 6 years.

FARMS

- More face to face outreach by staff with the growers – outreach/workshops
- Agreement forms for FARMS too long and too many loops compared to FDACS
- Fund AMR metering or at least the difference between AMR and a regular meter – If the District wants data monthly and the other Districts are at 1/4ly, provide funding incentive.

Agricultural Teams/Institution Knowledge in Agriculture

- Maintain flexibility of the surface water permitting program

Meeting Summary
Progressive Water Resources Consulting
08/30/2018 @ 10:00 to 12:00
PWR Office

Attendees: David Brown, Jim Guida, Devin Lemke, April Breton, Mark Luchte, Chris Zajac

Industry Challenges:

- Diseases/Hurricanes/Trade Wars/Competition for Water

Problems Areas for SWFWMD to Consider

WUP

- Modify AGMOD to take into account smaller root zone, new tree planting densities, ridge conditions
- Use actual rainfall for final WUP compliance check.
- SWUCA credit reload frequency
- Avoid auto generated letters as much as possible.
- Don't penalize for abandoned grove non-use when calculating net-benefit trade in MIA
- Avoid combining of WUPs unless truly necessary; also only do this on renewal not during ownership transfer
- Simplify citrus crop reporting; Utilize Google Earth and have a 'No Changes' button option
- Meter calibration frequency can be hard to find; have automation method or table available
- Voluntary AMR with financial cost share assistance
- Have a WUP staff member in each Service Office
- Have a designated Regional Ag Team Hydro familiar with ag practices and good with the public

FARMS

- Outreach to bring a similar cost-share program to other WMDs
- Cost-share replace of water wasting spin filters
- Make it easier to withdraw from impoundments incorporating wetlands or adjacent to wetlands
- Simplify contracts and quicker reimbursement
- Fund automation despite higher \$/1000 gallons saved
- Cost share propane engines that can incorporate automation

ERP

- Open the AGSWM Agreement reimbursements payments to private P.E. consultants.
- Convert old ERP & MSSWs to AGSWMs when appropriate
- Use FDACS BMP manual enrollment in lieu of formal water quality treatment ponds

Other

- More service office REG staff available
- More outreach touting all programs available
- Succession plan for retiring knowledgeable staff
- Less emphasis on 15 days, more emphasis on received to issuance time

Meeting Summary
Turner Hickory Groves
06/07/2018 @ 12:00 to 1:30
Tampa Service Office

Attendees: Jeff Krieger (Consolidated Citrus, Turner Hickory Groves & Ag Advisory Committee Member) and Chris Zajac

Industry Challenges:

- Diseases
- Tree availability for replanting

Problems Areas for SWFWMD to Consider

WUP

- Meter calibration requirements – cost roughly \$250 per meter.
- Credits associated with WUP. How will 20-year permits be considered?
- AGMOD – allocations for citrus is very tight. Some citrus operations along the central ridge may be under allocated.
- WUP quantities in the MIA. One grove in the MIA is currently irrigating more acreage than is shown on the permit but cannot get increase in permitted quantity.
- Ability to use surface water as an alternative source has been difficult. Example, historically used a series of ditch blocks to hold back surface water to be used for irrigation. Over the years stopped using the surface water and eventually wanted to go back to using the surface water. The process to once again use the surface water for irrigation was tedious and very expensive. In many cases the use of an alternative supply has larger resource benefits than minor impacts to localized systems. This should be considered when issuing WUPs.

FARMS

- Increase the cost share amount (75%) and increase the scope of what qualifies for reimbursement. Automation is expensive and is difficult to meet current cost/benefit criteria used by FARMS staff.
- Fund Automatic Meter Readers (AMR) for citrus or at least the difference when replacing a meter.
- FARMS contracts are too complicated as compared to FDACS. They should be streamlined. Takes too long to get contract executed.
- Increase cost share for Mini-FARMS.
- Extend cost share rate of 75% in the MIA. Expires in September.
- Research needed – soil amendments being used to improve soil moisture holding capacity. How much water does this save? Could it be considered a water conservation BMP?

Meeting Summary
MJW Ranch LLC (formerly Bright Hour Ranch)
August 3, 2018 – 9 AM
Phone Call (614)208-2335

Phone: Michael and July Walton (WUP 7462)
District Staff: Ross Morton

Industry Challenges:

- Hurricane damages
- Tree diseases

District Challenges:

- Excessive recertification requirements
- District required quarterly water quality monitoring WUP

Problems Areas for SWFWMD to Consider

WUP

- Required to perform quarterly water quality testing on a well with no understanding of why. This is an expense and would like to get reduced – *Separate from this effort, ombudsman is following up with WUP to see if this can be removed or frequency reduced to once a year.*
- Meter calibration requirements – cost roughly \$200 to 300 per meter. Extending 5 to 10 would be a help.
- AMR would be something to consider. Did not know that was an option.
- Monthly to quarterly data entry would help.
- Data entry not friendly. Takes more effort on wells not being used than reporting actual usage
 - Should have a “no-change” option
 - Website for data entry changed without prior notice

Surface Water

- Went through a surface water recertification process and was made to change weir elevation that was only off 1 inch. Was unaware the District had an Ag Teams that could have provided assistance. Consultant made the process expensive.
- Better outreach should be conducted with small growers to understand the assistance the District provides in the way of their regional teams and the ability to simplify regulatory requirements.

FARMS

- Participated in the program and it helped improve water quality through well plugging and surface water.
- Most of it was here when we bought the ranch.
- Not sure how it could benefit me further.
- The contract seemed very cumbersome and non-user friendly.



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Comparing theoretical irrigation requirement and actual irrigation for citrus in Florida

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ABSTRACT

Florida ranks first in citrus production, with nearly 68% of all U.S. citrus growing in the season 2005–2006. Most of the citrus groves are located from central to south Florida, and agricultural irrigation permitting is regulated by three of Florida's five water management districts. Most of the permitting for citrus production in Highlands, Polk and Hillsborough counties is conducted by the Southwest Florida Water Management District (SWFWMD), and quantities are based on the District's AGMOD computer program. In 2003, the SWFWMD implemented new permit criteria so that permitted amounts were more representative of actual water use. This paper compares grower reported citrus irrigation water use in Highlands, Polk and Hillsborough counties from 1994 through 2005 with permitted and theoretical irrigation requirements calculated by a daily water balance. Two different sets of crop coefficients (K_c 's) developed for citrus in Florida were compared in the daily soil water balance calculation of theoretical irrigation requirements. The percentage of irrigated area considered in this study ranged from 40 to 60% to simulate a range of grower practices. Meteorological data from two weather stations and additional rainfall information from 50 locations within the three counties was used in the water balance. Missing and error values in the meteorological historical record data were filled with weather generators. The multiannual average water consumption (including cold protection water use) from growers ranged from 243 (Hillsborough) to 406 mm (Highlands) and the multiannual average permitted irrigation requirement (without cold protection) ranged from 295 to 557 mm. The simulated gross irrigation requirements under different scenarios of location- K_c -wetted area were variable but mostly lower than the limits established by the district, except for some scenarios in Polk County, whose maximum simulated irrigation value reached 578 mm year⁻¹. In general, permitted limits recommended by the SWFWMD seem to be reasonable for the actual water use by growers in these counties.

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1. Introduction

Citrus is an important crop in Florida covering 233,260 ha in the 2005–2006 season, representing 68% of U.S. citrus production, with 7,832,000 Mg, and accounting for \$1.04 billion in

harvested product (FASS, 2006). Most of the citrus groves are located in 32 counties in the central and southern parts of Florida, across the southern two-thirds of the peninsula (Hodges et al., 2003). Polk and Highlands have the highest citrus production yield in the state, with commercial areas of

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Appendix IV – Work Plan

Fiscal Year 2019 Work Plan
Citrus Task Force (CTF)
January 25, 2019

The Southwest Florida Water Management District (District) formed the Citrus Task Force (CTF) in the summer of 2018. This was in response to feedback received from the citrus industry because of the catastrophic economic impacts it was experiencing due to recent hurricanes and ongoing incapacitating tree diseases. A clear indicator of the economic challenges this industry is facing is evidenced by the fall in its production levels below pre-World War II levels. The main purpose of the CTF was to solicit input from the citrus industry on the obstacles they were facing, and then to determine if the District could reduce any inadvertent economic costs associated with its regulatory and funding programs without comprising the District's statutory obligations. The CTF developed a communication plan and conducted outreach to associations, permittees, government entities, consultants, etc. that culminated in a meeting with the Agricultural Advisory Committee to solicit additional input on potential solutions. The core CTF members consist of Chris Zajac (FARMS Program Manager), April Breton (Water Use Manager), Mark Luchte (Agricultural Regulation Manager), and Ross Morton (Ombudsman).

As a result, the District is committed to addressing the 10 consensus items and 2 non-consensus items identified by the CTF during its outreach effort to the citrus industry. A consensus item is where 50% of the entities interviewed shared the same concern. The purpose of the work plan is to identify the tasks, completion dates, and the District personnel involved in addressing the applicable item. An update of the progress of each item will be made to Executive in July/August 2019. Final approval of this plan was achieved from Executive on January 25, 2019. Any comments or edits provided by Executive following delivery on January 25, 2019 of the work plan will be revised accordingly.

Consensus Items

Item No. 1 Assess meter testing frequency requirements and consider options to reduce and/or offset grower costs without compromising data integrity

The goal is to reduce unnecessary costs to the agricultural industry while maintaining the integrity of the District's water use estimates and resource monitoring.

No.	Overall Task – Evaluating the <i>Feasibility of reducing meter frequency costs (i.e., 1:5 to 1:10)</i>	Division	Essential Personnel	Lead	Completion Dates
1A	Examine direct effects on data reliability and accuracy <ul style="list-style-type: none"> Develop database framework Compile Meter Accuracy tests into a search data base Compile meter replacements for DID's with 2017 testing requirements Existing and proposed Meter Accuracy Assessment Document methodology and finding results for this task 	RM (WS) REG	Thomas K. Kevin W. Jay H. Michelle E. SIP Ed K. April B.	Kevin W.	03/15/2019 <i>02/25/2019</i> <i>02/25/2019</i> <i>03/01/2019</i> <i>03/01/2019</i> <i>03/15/2019</i>

1B	<p>Examine indirect effects on water use data, District programs, and Agricultural Permittees</p> <ul style="list-style-type: none"> • Develop database Framework • Generate and format monthly water use data set • Develop permit level water use analysis • Document methodology and findings for this task 	RW (WS) REG	<p>Thomas K. Kevin W. Jay H. Michelle E. SIP Ed K. April B.</p>	Kevin W.	<p>04/12/2019</p> <p><i>03/25/2019</i> <i>03/25/2019</i></p> <p><i>04/01/2019</i> <i>04/12/2019</i></p>
1C	<p>Summary Report</p> <ul style="list-style-type: none"> • Report methodology and findings in Technical Memorandum • Summarize methods, findings, and recommendations in presentation to essential personnel listed in tasks 1A-C • Finalize draft report 	RW (WS) REG	<p>Thomas K. Kevin Wills April B.</p>	Kevin W.	<p>May 10, 2019</p> <p><i>April 29, 2019</i></p> <p><i>May 8, 2019</i></p> <p><i>May 10, 2019</i></p>
1D	<p>Presentation to Leadership</p> <ul style="list-style-type: none"> • Present findings to applicable Management • Finalize Summary Report that includes recommendations • Present to Executive Team 	RW REG	<p>JP Eric D. Darrin H. April B. Jay H. Kevin W.</p>	Ross M.	<p>June 15, 2019</p> <p><i>May 20, 2019</i></p> <p><i>June 1, 2019</i> <i>June 15, 2019</i></p>
1E	<p>Implement Recommendations</p> <ul style="list-style-type: none"> • If applicable draft rules • If applicable develop offset program • Review with OGC • Present to Executive • Schedule Board presentation • Implement recommendations 	RW/REG OGC	<p>JP Eric D. April Chris Z. Ross M. OGC Jay H. Darrin H.</p>	Later date	<p>March 30, 2020</p> <p><i>Sep 1, 2019</i> <i>Sep 1, 2019</i> <i>Oct 1, 2019</i> <i>Nov 15, 2019</i> <i>Feb 2, 2019</i> <i>Mar 30, 2020</i></p>

Item No. 2 Evaluate technology that offset the monthly pumpage data collection costs for the grower and provides quantifiable benefits such as improvements in data integrity, water savings, etc.

The water use rules for the SWFWMD are unique and emphasis irrigation efficiency and conservation. In addition to its general water use rules, the SWFWMD established water use caution areas to address resource concerns. An aspect of this rule is the requirement that non-mulch crops receive a 5 in 10 allocation with provision to utilize drought credits. As a result, monthly monitoring is essential for a permittee to stay within their allocated quantity due to peak month allowances resulting from seasonal variability in irrigation demands and the consumption of credits during drought years. The goal in addressing this item is to reduce the costs to the agricultural permittees that is associated with gathering and submitting monthly pumpage data to the District.

No.	Tasks 2A – Collection Costs vs. Monthly AMR Costs	Division	Essential Personnel	Lead	Completion Dates
2A	<p>Conduct a comparison analysis of the monthly AMR maintenance costs versus the approximate conservative estimate of the \$27 per monthly collection costs currently experienced by the grower</p> <ul style="list-style-type: none"> Itemize per meter costs associated with all aspects of utilizing AMR Develop a written analysis and present to the Executive Team 	RM REG	April B. Talia P. Michelle E. Kevin W.	April B.	<p>05/01/2019</p> <p>04/01/2019 05/01/2019</p>

No.	Task 2B – Develop proposal	Division	Essential Personnel	Lead	Completion Dates
2B	<p>Depending on findings from Task 2A develop recommendation to either take no action or develop a proposal.</p> <ul style="list-style-type: none"> Conduct meeting following Executive to determine next course of action Develop proposal that clearly identifies benefits to the grower and the District Present to Executive 	RM REG	April B. JP B. Eric D. Darrin H. Ross M. Chris Z. Talia P.	<p>Ross M. Chris Z. April B. or Jay H.</p> <p><i>To be determined Ross is the lead on setting up follow up meeting once task 2A is complete</i></p>	<p>08/30/2019</p> <p>06/01/2018 08/01/2019 08/30/2019</p>

Item No. 3 Utilize user feedback to improve the District’s data entry system and expedite applicable upgrades when possible

The goal is to enhance the end user experience in entering pumpage data and other required information associated with the Districts water use permitting program.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Prioritize upgrade of system to allow repopulation of unchanged information “box.” This should include not having to re-enter crop reports, zero on wells not in use, etc.	REG MS EXE	April B. Tom H. Mandi R. Hannah K.	April B.	04/01/2019
2	Develop communication plan that includes the following: <ul style="list-style-type: none">• Ongoing improvements based on feedback from user groups• Identification of users/focus groups• Periodic surveys focused on soliciting feedback on how the system can be improved	REG EER	April B. Melissa G.	April B.	04/01/2019

Item No. 4 Update the District’s agriculture irrigation model (AGMOD) to ensure the appropriate amount of water is allocated for irrigation and that it recognizes current agricultural practices

Industry practices associated with agriculture have changed overtime such as production losses to the citrus industry due to tree diseases (i.e., tree sets increasing from 115 per acre to 400 or greater). In addition, past research involving District personnel has indicated certain areas on the ridge maybe slightly under allocated. The goal of this item is to reduce unnecessary compliance actions by the District to growers that are using the appropriate allocations to maintain tree health.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Update AGMOD <ul style="list-style-type: none">• Address ridge conditions• Increased tree densities• Initiate any needed research	REG	Mark L. Jeff W. April B. Vaughn B.	Mark L.	04/01/2019

Item No. 5 Memorialize practices that promote the conversion of permitted surface water management systems via the District’s exemption program (AGSWM) that conserve water and benefit the environment

Conversion of permitted surface water systems to AGSWMs often have benefits in conserving groundwater and improving the water quality of the systems discharge. However, conversions of this type that are beneficial to the resource and environment can be discouraged due to bureaucratic and administrative obstacles. The goal of this item is to ensure conversions that are beneficial to conserving groundwater and the environment are not discouraged through unnecessary bureaucracy.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Develop guidance document that ensures conversions to AGSWM that conserve groundwater and benefit the environment are not bureaucratically discouraged.	REG	Michelle H. Mark L. Karen W.	Mark L.	05/01/2019

Item No. 6 Memorialize in the District’s compliance process the practice of considering “actual rainfall” in the District’s irrigation model (AGMOD) when evaluating overpumpage

Non-mulched crops receive a 5 in 10 allocation that due to extended drought conditions can result in the consumption of credits resulting in the permittee(s) being included on the Board packet overpumpage list even though the appropriate amount of water is being applied to maintain tree health when actual rainfall is considered. The goal in addressing this item is to avoid unnecessary compliance/enforcement action by the District and inclusion of permittees on the Board packet overpumpage list when applying the appropriate amount of supplemental irrigation.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Memorialize practice when drought credits are consumed, it is a drought year, and actual rainfall from the site or closest rain gage verifies a greater than 2-10 drought event then incorporate the following: <ul style="list-style-type: none"> Enforcement is not initiated Not included on the Board overpumpage list Coordinate with “Anti-Drift” Any Board update/interaction 	REG	April B. Darrin H. Karen W. Mark L. Ed K	April B. Mark L. Draft April B.	05/30/2019 02/15/2019 05/01/2019 05/01/2019

Item No. 7 Initiate rulemaking to ensure water conservation credits are applied at the 10-year interval for 20-year permits for non-mulched crops (i.e., citrus, sod, etc.)

Non-mulched crops receive a 5 in 10 allocation that due to extended drought conditions credits are utilized for drought years. The goal in addressing this item is to ensure credits are reloaded at renewal and the 10-year interval for 20-year permits.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Establish rule for reloading of credits for non-mulched crops at renewal and the 10-year interval for 20-year permits. <ul style="list-style-type: none"> Governing Board 	REG	Darrin H. April B. Karen W.	April B.	09/30/2019

Item No. 8 Update FARMS Model Economic Study with a focus on precision irrigation, update cost-benefit rates to increase opportunities for more growers to participate in water conservation projects and where possible streamline the contract process

FARMS is a highly valued cooperative funding program with the agricultural community. The goal of addressing this item is to improve the administrative aspects of the program for its intended users based on the feedback received by the CTF.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Streamline FARMS Contract – Revise Template <ul style="list-style-type: none"> Ag Advisory Approval 	RM (FARMS)	Chris Z. Mary Beth M. Steve S. Melisa L. Erica R. Eric D. Rachelle J.	Chris Z.	06/06/2019 (Ag Adv. Approval)
2	Update Model Farms Economic Study with emphasis on precision irrigation <ul style="list-style-type: none"> Budget \$100K in FY2020 Develop Scope/Hire Contractor - GES Update Study – Begin work October 2019 Replace FARMS Rule with a Board Policy - Ag Advisory and Governing Board 	RM (FARMS)	Chris Z. PMO (Model Farms Economic Study) Mary Beth M. Erica R. Eric D. Jennette S. (Board Policy)	Chris Z.	06/2020 09/01/19 (Contract in CASE for Economic Study) 09/05/2019 (Ag Adv. Approval of Board Policy) 09/24/2019 (Board Approval of Board Policy)
3	Implement efficiencies where possible to expedite FARMS contracts	RM (FARMS)	Chris Z. Mary Beth M. Steve S. Melisa L. Rachelle J.	Chris Z.	03/15/2019

Item No. 9 Maintain the District's agricultural personnel and expertise through succession planning and the development of service area expertise to assist in maintaining local relationships

During the outreach effort the citrus industry indicated the District provided excellent customer service in support of its regulatory and funding programs. The goal of addressing this item is to ensure for succession planning for its agricultural personnel, maintain relationships with the agricultural community, and maintain excellent customer service.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Develop succession plan for its agricultural personnel such as: <ul style="list-style-type: none"> Ag Regional Team Meet with HR 	REG HR	Michelle H. Jeff W. Mark L. Darrin H. April B. Kelley R.	Mark Mark	09/30/2019 08/01/2019
2	Establishment of service area specific agricultural liaisons that are clearly identifiable to the agriculture community <ul style="list-style-type: none"> Assist in establishing local relationships Develop agricultural expertise by working with the regional team Attend local agriculture functions Update District Ag web page 	REG	Michelle H. Jeff W. Mark L. Darrin H. April B. Carrieann A.	April	09/30/2019
3	Role of the Regional WUP <ul style="list-style-type: none"> Role in the permitting process Role in conflict resolution 	REG	April B. Mark L. Jeff W. Darrin H.	April B. Mark L.	04/30/2019
4	Ongoing Communication training with emphasis on consultant interactions	REG HR	Darrin H. Michelle H. Kelley R.	April B.	04/01/2019
5	Compilation report of the items identified above and associated tactics/strategies	REG/HR	Mark L. April B. Kelley R.	Mark L.	09/30/2019

Item No. 10 Ease unnecessary economic burdens when water use permits less than 100,000 gallons per day are combined triggering metering requirements

This is an issue that primarily impacts the citrus industry in the Bartow service area. Resource Management and Regulation coordinated and determined that information resulting from increased metering as a result of this rule would not improve the accuracy of its data. The goal of addressing this item is to reduce the economic impact of what situations trigger the combining of non-metered generals while maintaining the Districts statutory obligations. The following provisions were agreed upon:

- Initiate a rule change that sets parameters for when common enterprise is not applied:
 - ✓ Parcels under similar ownership separated by road maintained by a municipality
 - ✓ Parcels under similar ownership that are separated by parcel under different ownership
 - ✓ Less than three parcels under similar ownership with a contiguous boundary. Parcels subject to metering are not counted in this calculation.
- A non-retroactive rule that specifies from this date forward WUPs combined under this rule the metering requirement can be removed if the parcel goes under different ownership, falls below the metering threshold, meets other applicable criteria, and obtains a minor modification.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Establish rule that incorporates provisions identified above concerning 40D-2.041(2), F.A.C. <ul style="list-style-type: none">• Coordinate with "Anti-Drift"• Governing Board (i.e., Recap, etc.)	REG	April B. Ross M. Karen W.	April B. April B.	06/30/2019 05/01/2019 06/30/2019

Non-Consensus Items

Item No. 1 Provide a one-time extension of the recertification requirement for agricultural permitted surface water management systems upon verification the system is functioning as designed

The goal of addressing this item is to temporarily reduce costs for the agricultural permittee in verifying their surface water system is being properly maintained and functioning as designed as required by their permit authorization.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Develop and implement relief to agricultural permittee for their next recertification: <ul style="list-style-type: none">• Communicate relief option to Permittees• Permittee would have to verify system is functioning as designed.	REG EER	Mark L. Michelle H. Jeff W. Melissa G.	Mark L.	04/01/2019

Item No. 2 Develop a communication effort to reinvigorate the District's Water Use Permit advisory meeting

This effort will involve outreach to determine if this meeting is useful to the entities involved in water use permitting, needs better advertising, and/or be reformatted to increase participation/attendance/interest to better meet the needs of the interested parties.

No.	Tasks	Division	Essential Personnel	Lead	Completion Dates
1	Develop proposal and implement changes to increase public participation and utilization: <ul style="list-style-type: none">• Develop Communication/Outreach Plan• Implement recommendations.	REG EER	April B. Melissa G. Darrin H. Robyn F.	Ross M.	06/01/2019