



December 12, 2019

Steffany Olson
Science Supervisor
Everglades Policy and Coordination Division
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406

via email to solson@sfwmd.gov

Re: Chapter 40E-61 Notice of Development of Rulemaking

Dear Ms. Olson:

The Florida Cattlemen's Association would like to provide the following comments regarding the Chapter 40E-61 Rule workshops held last month in various locations within the Northern Everglades of South Florida Water Management District. The Florida Cattlemen's Association (FCA) represents one of the largest cattle industries in the United States, with more than five thousand members and five million acres of pasture and range land. We want to continue our heritage of being the best possible stewards of the land.

I and many other FCA officers and members personally attended the workshops and we will continue to be engaged in the rule development. Please provide the draft rule as soon as available; though we are appreciative of the workshops, it was difficult to offer substantive comments since very few details were provided at that time. Therefore, our comments below will be based upon the presentation information and the question and answer sessions.

- 1) Thank you for confirming that District is not proposing a rule to impose additional/duplicative Best Management Practices (BMPs) since the Florida Department of Agriculture and Consumer Services (FDACS) is responsible for agricultural BMPs and Florida Department of Environmental Protection (FDEP) is responsible for non-agricultural BMPs. FDACS is in the process of updating the Water Quality/Water Conservation Best Management Practices for Florida Cattle Operation's Manual with the latest knowledge and science-based information. We are hopeful that more resources and cost-share funds will be made available to FDACS to implement more practices and projects on a larger landscape level for water quality improvement.

- 2) The FCA also had representatives attend FDEP's Blue Green Algae Task Force meetings which included the State's new Chief Science Officer, Dr. Thomas Frazer as Chairman. The Task Force's distinguished panel members in their final report, determined that more research (e.g. BMP and legacy phosphorus) and monitoring was necessary in the Northern Everglades and Estuaries Watersheds to make informed, scientific decisions on the next appropriate actions. Therefore, we believe the portions of the rule development that discussed informing decisions on actions by establishing methods to evaluate and assess data to track progress and defining conditions for taking action and identifying actions, seems inappropriate especially when current laws provide a basis for water quality results to be incorporated into future BMAP updates and BMP revisions. We support more water quality research concerning legacy nutrients and believe, based on the Task Force recommendations, that this type of research may be more appropriate under the Basin Management Action Plans (BMAPs) for each of the watersheds.

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We thank you for the opportunity to comment. We also look forward working with you as we review and respond to specific rule text when it becomes available.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matt Pearce', with a stylized, cursive script.

Matt Pearce, President
Florida Cattlemen's Association

Cc: Drew Bartlett
Pam Wade

The Florida Cattlemen's Association is a statewide non-profit organization established in 1934. For more information, visit floridacattlemen.org or call (407) 846-6221.