



COMPREHENSIVE PLAN AMENDMENT STAFF REPORT AMENDMENT ROUND 21-B2

DEO TRANSMITTAL REPORT, JULY 28, 2021

I. General Data

Project Name: LWDD AGR Preserve Areas
Element: Future Land Use Element
Project Manager: Bryan M. Davis, CNU-A, Principal Planner
Staff Recommendation: Staff recommends *approval* based on the findings and conclusions presented in this report.

II. Item Summary

Summary: This is a County Initiated amendment directed by the Board of County Commissioners to revise the Future Land Use Element of the Comprehensive Plan. The proposed amendment will establish a limit of canal rights-of-way owned by the Lake Worth Drainage District and utilized for right-of-way purposes to be eligible to be Preserve Areas for an Agricultural Reserve Planned Development (AGR-PDD) for acreage calculations or for density purposes.

Background: On May 5, 2021, the Board of County Commissioners upheld the Planning Commission finding that canal rights-of-way owned by a public agency and utilized for right-of-way purposes *are* eligible to be Preserve Areas for an Agricultural Reserve Planned Development (AGR-PDD) for acreage calculations or for density purposes provided that the proposed preserve areas are adjacent to existing AGR-PDD preserve areas or other preserved lands (such as County owned bond purchases).

Assessment: This proposed amendment will implement the Board direction to allow the processing of Zoning application PDD/DOA 2021-0122 Monticello AGR-PUD proposing to utilize canal rights-of-way owned by the Lake Worth Drainage District (LWDD) and utilized for right-of-way purposes to be preserve areas. The proposed language will ensure that there are no additional canals and/or rights-of-way eligible for preserve areas in the future, pursuant to Board direction. This amendment will clarify existing language in the Comprehensive Plan.

III. Hearing History

Local Planning Agency: *Approval*, motion by Kiley Harper-Larsen, seconded by Glenn Gromman, passed in a 11 to 3 vote with Barbara Roth, Cara Capp and Marcia Hayden dissenting at the July 9, 2021 public hearing. Under discussion, Commission members questioned whether the proposed amendment applied only to Agriculture Reserve area only and if the current amendment affected LWDD interests in other parts of the County, and recognized the significant role the LWDD performs for County residents. County staff stated that the proposed amendment will prevent any additional LWDD-owned canals/rights-of-way from being preserves. Additionally, the Executive Director of the LWDD indicated that the LWDD Board of Supervisors passed the resolution stating that they will not pursue the sale of any additional development potential associated with their canals in the Agricultural Reserve. One member of the public representing the Sierra Club spoke in opposition and a letter from 1,000 Friends of Florida and the Sierra Club was read into record (see Exhibit 2). A representative from G.L. Homes spoke in support.

Board of County Commissioners Transmittal Public Hearing: *Transmit with modifications*, motion by Vice Mayor Weinroth, seconded by Commissioner Marino, passed in a 5 to 2 vote with Commissioner Sachs and Mayor Kerner dissenting at the July 28, 2021 public hearing. The motion included the addition of a super majority (approval of at least five members of the BCC) requirement for any changes regarding the LWDD-owned canals which are reflected in Exhibit 1 in double underline. Under discussion, the Commissioners commented that the language proposed did not grant the ability for any additional LWDD canals to become preserve; rather the language limited the LWDD canals to the ones discussed at the May 5th hearing in the Monticello AGR-PUD Zoning application. One member of the public spoke in support, and one member of the public representing the Sierra Club spoke in opposition.

State Review Agency Comments:

Board of County Commissioners Adoption Public Hearing:

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IV. Intent

This is a County Initiated amendment directed by the Board of County Commissioners to revise the Future Land Use Element of the Comprehensive Plan. The proposed amendment will establish a limit on the amount of canal rights-of-way owned by the Lake Worth Drainage District and utilized for right-of-way purposes to be eligible to be Preserve Areas for an Agricultural Reserve Planned Development (AGR-PDD) for acreage calculations or for density purposes.

V. Background

On May 5, 2021, the Board of County Commissioners (BCC) upheld the Local Planning Agency/Planning Commission (LPA/PLC) finding that canal rights-of-way owned by a public agency and utilized for right-of-way purposes **are** eligible to be Preserve Areas for an Agricultural Reserve Planned Development (AGR-PDD) for acreage calculations or for density purposes provided that the proposed preserve areas are adjacent to existing AGR-PDD preserve areas or other preserved lands (such as County owned bond purchases).

The May 5, 2021 BCC agenda item was to consider an appeal of a Comprehensive Plan determination issued by the Planning Director in a letter dated January 25, 2021. The Planning Director's letter states that Lake Worth Drainage District (LWDD) canal rights-of-way owned by a public agency and utilized for right-of-way purposes are not eligible to be Preserve Areas for an Agricultural Reserve Planned Development (AGR-PDD) for acreage calculations or for density purposes. This letter was part of a finding of insufficiency for Zoning application Monticello AGR-PUD (PDD/DOA-2021-00122) made by Boynton Beach Associates XXVI, LLLP (GL Homes) to swap 276.127 acres of existing preserve (mostly row crops) with 63 segments totaling 281.960 acres of LWDD canal rights-of-way.

On February 23, 2021, the appellant requested an appeal to the Local Planning Agency/Planning Commission (LPA/PLC) pursuant to the process established in the Introduction and Administration Element of the Comprehensive Plan. On April 9, 2021, the LPA/PLC voted in favor of the appellant to grant the Appeal of the Planning Division Administrative Determination. The motion was by Glenn Gromann, seconded by Evan Rosenberg, passed in a 6 to 4 vote with Barbara Roth, Angella Vann, Dagmar Brahs and Cara Capp dissenting. A previous motion to accept the Planning Division administrative determination failed in a 4 to 6 vote, motion by Barbara Roth, seconded by Angella Vann with Glenn Gromann, Evan Rosenberg, Penny Pompei, Lori Vinikoor, Kiley Harper-Larsen and Eric Royal dissenting.

The Comprehensive Plan states that the "determination of the LPA may be appealed to the BCC by the petitioner, staff, or any aggrieved or adversely affected party as defined by Florida Statutes, Section 163.3215(2)" and that the BCC may accept, reject or modify any action taken by the LPA. Staff appealed the LPA/PLC decision regarding the Appeal of the Planning Division Administrative Determination to the BCC. On May 5, 2021, the BCC voted to uphold the LPA/PLC determination, with the motion by Commissioner Marino, seconded by Commissioner Bernard passed in a 5 to 2 vote with Mayor Kerner and Commissioner Sachs dissenting. Under discussion, Commissioners deliberated the language interpretation in the Comprehensive Plan. The Board directed staff to return with an amendment to the Comprehensive Plan policy to ensure that no future LWDD owned canals/rights-of-way are available for AGR-PUD preserve areas. Additionally, the Board direction included that only LWDD canals that are adjacent to existing/approved preserve areas are eligible to be AGR-PUD preserves, necessitating removal of some of the canals from the zoning application. The representatives for the applicant expressed agreement with the Board direction.

V. Data and Analysis

This section provides data and analysis, including an examination of consistency with the Comprehensive Plan.

A. Development Review Process

Since 2001, County staff implemented the AGR-PDD policies through the development review process. To date, no land owned by the LWDD was approved as a stand-alone preserve. Approved preserve areas included LWDD easements as a portion of the larger preserve. This occurred on about 65 acres out of approximately 2,700 acres of land under conservation easement. The direction from the Board at the May 5, 2021 hearing is to allow for stand-alone preserves owned by the LWDD.

B. Proposed Amendment

This amendment is summarized below with the specific strike out and underline changes to the Comprehensive Plan shown in **Exhibit 1**, and summarizes the overall basis and justification for each change.

The Agricultural Reserve policies in the Comprehensive Plan establish very specific regulations and requirements for new development within the County's Agricultural Reserve Tier, and the requirements for preserving land for specific purposes.

The application for Monticello AGR-PUD in January 2021 included over 280 acres of LWDD-owned canals as preserves. Of those 280 acres, the applicant stated that 276.509 acres were adjacent to existing preserves. At the May 5, 2021 hearing, the Board found the utilization of these preserve areas to be consistent with the existing policies and directed staff to bring back changes to the policies that ensure that only those LWDD canals adjacent to existing preserves and subject of Zoning Application PDD/DOA-2021-00122 could be included, and that the policy language regarding canals in preserve areas are limited to those canals included in this application.

Changes to the specific policies are as follows:

- **Policy 1.5.1-i.6:** This policy addresses the requirements for an AGR-PUD utilizing the 60/40 development option. Specifically, the policy under 6.a speaks to the preserve area requirements. The policy is reformatted and restates the requirements for preserves, but clarifies that "water management purposes" includes South Florida Water Management District water preserve areas, or certification as regional drainage purposes. It also specifically allows the LWDD-owned canals in the current Zoning application, as well as the allowance for the Department of Environmental Resources Management to maintain their ability to approve preserves for water management and environmental resource values. The remaining sentences are reformatted accordingly with no substantive changes proposed.
- **Policy 1.5.1-n.5:** This policy addresses the requirements for AGR-TMDs and AGR-MUPDs that are required to meet the 60/40 development option. The changes are similar to those outlined in the preceding policy analysis. There are no preserves associated with either of these development types that propose to use LWDD-owned preserves and the changes would now preclude any LWDD-owned canals from being included in these preserves, consistent with the May 5th Board direction. As such, no allowances were included. Changes to

remaining sentences are reformatted accordingly with no substantive changes proposed or reworded for clarity.

B. Consistency with the Comprehensive Plan

The proposed amendments will provide policy language that clarifies the Board's intent behind the existing AGR-PUD Preserve area policies in the Future Land Use Element. Staff assessment of the consistency with these provisions is provided under the Staff Assessment heading. Unrelated language is omitted for brevity.

FLUE, C. County Directions. *The Future Land Use Element was created and has been updated based on input from the public and other agencies through citizen advisory committees, public meetings, interdepartmental reviews, and the Board of County Commissioners. All contributed to the generation of the long-term planning directions, which provide the basis for the Goals, Objectives and Policies of the Future Land Use Element. These directions reflect the kind of community the residents of Palm Beach County desire.*

1. ***Livable Communities.*** *Promote the enhancement, creation, and maintenance of livable communities throughout Palm Beach County, recognizing the unique and diverse characteristics of each community. Important elements for a livable community include a balance of land uses and organized open space, preservation of natural features, incorporation of distinct community design elements unique to a given region, personal security, provision of services and alternative transportation modes at levels appropriate to the character of the community, and opportunities for education, employment, health facilities, active and passive recreation, and cultural enrichment.*
2. ***Growth Management.*** *Provide for sustainable communities and lifestyle choices by: (a) directing the location, type, intensity, timing and phasing, and form of development that respects the characteristics of a particular geographical area; (b) requiring the transfer of development rights as the method for most density increases; (c) ensuring smart growth, by protecting natural resources, preventing urban sprawl, providing for the efficient use of land, balancing land uses; and, (d) providing for facilities and services in a cost efficient timely manner.*
4. ***Land Use Compatibility.*** *Ensure that the densities and intensities of land uses are not in conflict with those of surrounding areas, whether incorporated or unincorporated.*
5. ***Neighborhood Integrity.*** *Respect the integrity of neighborhoods, including their geographic boundaries and social fabric.*

Staff Assessment: This proposed amendment will fulfill each of these directions by revising the Plan to fully incorporate the objectives and basis for each of the regulatory policies. The amendments are a subtle refinement of the Master Planning effort to achieve the overall goals of the Tier to “*preserve and enhance agricultural activity and environmental and water resources in the Ag Reserve*” while fostering a sustainable development pattern.

FLUE, Consistency with Agricultural Reserve Policies

Objective 1.5: *Palm Beach County shall preserve the unique farmland and wetlands in order to preserve and enhance agricultural activity, environmental and water resources, and open space within the Agricultural Reserve Tier. This shall be accomplished by limiting uses to agriculture and*

conservation with residential development restricted to low densities and non-residential development limited to uses serving the needs of farmworkers and residents of the Tier. The Agricultural Reserve Tier shall be preserved primarily for agricultural use, reflecting the unique farmlands and wetlands within it.

Staff Assessment: The proposed amendments are consistent with and contribute to the fulfillment of this objective. The proposed policy changes further clarify how potential development may meet this objective, while allowing the Board the flexibility to include select LWDD-owned canals as preserves, as is their legislative discretion in setting local policy regarding development approvals.

C. Unified Land Development Code Implications

This proposed amendment will require revisions to the Unified Land Development Code. Staff is proposing an amendment to ULDC Article 3.E.2.F.3 Preserve Area (for AGR-PUDs) to allow for LWDD-owned canals to serve as preserves as proposed in this Plan amendment. No specific code changes are necessary for AGR-TMDs and AGR-MUPDs as those code sections reference compliance with the AGR-PUD Preserve Area requirements.

VII. Public and Municipal Review

Intergovernmental Plan Amendment Review Committee (IPARC): Notification was sent to the County's Intergovernmental Plan Amendment Review Committee (IPARC), a clearing-house for plan amendments, on June 22, 2021. At the time of the printing this report, no written requests for information or objections to the amendment had been received. One phone call from City of West Palm Beach staff was received regarding development rights on canals. Correspondence received is added to the exhibits throughout the amendment process.

VIII. Assessment and Conclusions

As demonstrated in this report, this proposed amendment reflects Board direction to allow limited opportunities for select LWDD-owned canals to serve as preserve areas for AGR-PDDs. Staff analysis indicates that the proposed amendments are consistent with the County Directions, the Objective of the Tier, and policies in the Comprehensive Plan. Additional changes to the ULDC and the Conservation Easements form templates may be required and will be addressed at a future date. This proposed amendment will implement the Board direction to allow the processing of Zoning application PDD/DOA 2021-0122 Monticello AGR-PUD proposing to utilize canal rights-of-way owned by LWDD and utilized for right-of-way purposes to be preserve areas. The proposed language will ensure that there are no additional canals and/or rights-of-way eligible for preserve areas in the future, pursuant to Board direction. This amendment will strengthen existing language in the Comprehensive Plan.

As such, staff recommends **approval** of this amendment.

Attachments

Exhibit 1 – Proposed changes in strike out and underline format	E – 1
Exhibit 2 – Correspondence	E – 4

Exhibit 1

A. Future Land Use Element, LWDD AGR Preserve Areas

REVISIONS: To revise language regarding LWDD canal rights-of-way as AGR-PDD preserve areas. The added text is underlined, and the deleted text ~~struck out~~. Changes subsequent to Transmittal are shown in double underline.

60/40 Planned Development Option

1. REVISE Policy 1.5.1-i: A 60/40 AgR-PUD shall require the following:

1. a minimum of 250 acres exclusive of right-of-way as shown on the Thoroughfare Identification Map;
2. that the development area be contained in one compact area and not exceed 40 percent of the gross acreage less right-of-way as shown on the Thoroughfare Identification Map. The development area shall contain uses normally associated with a PDD such as the street system, water retention areas, water amenity areas, active recreational areas (including golf courses), open space, which is integral to the PDD, and civic center sites;
3. the development area and the protected area need not be contiguous;
4. that the development area shall be situated east of State Road 7 with frontage on either State Road 7, State Road 806 (Atlantic Avenue), State Road 804 (Boynton Beach Boulevard), Clint Moore Road, Lyons Road extending north of Boynton Beach Boulevard or Lyons Road extending south of Atlantic Avenue and Acme Dairy Road extending south of Boynton Beach Boulevard to the L-28 canal. Other roadways may be added to this list, by Plan amendment, consistent with the goal of preservation and perpetuation of agriculture in the Agricultural Reserve Tier;
5. the development area shall not be situated west of State Road 7; and
6. that the preserve area shall consist of, at least, 60 percent of the gross acreage less right-of-way identified on the Thoroughfare Identification Map and be maintained in agriculture, passive recreation or other open space use. The preserve area shall:
 - a) contain a minimum area of 150 acres; and,
 - b) be utilized for crop production, pasture, equestrian purposes, retained as fallow land, or, serve water management purposes per one or more of the following:
 - 1) if designated by the South Florida Water Management District (SFWMD) as either a Water Preserve Area, or certified by SFWMD as serving regional water management purposes; or
 - 2) to serve regional water management purposes as certified by either the Lake Worth Drainage District (LWDD), or South Florida Water Management District, or Lands owned by LWDD as of May 5, 2021 shall be limited to lands adjacent to existing preserve areas and limited to a maximum 276.509 acres of preserved area identified in Zoning Application PDD/DOA 2021-0122. For the purposes of this provision, adjacent includes lands separated from existing preserves by lands owned by LWDD. Any changes to the LWDD-owned lands provisions above shall

require approval by at least five members of the Board of County Commissioners; or

3) for water management purposes not directly related to the 60/40 AgR-PDD if approved by the Department of Environmental Resources Management, and managed for environmental resource values.

c) Accessory agricultural structures such as barns and pump structures shall be permitted.

d) Agricultural support uses such as processing facilities, and the like shall not be accommodated in the protected area of an AgR-PDD, unless the parcel meets the criteria provided in Policy 1.5-h; nor shall new residential uses be accommodated thereon except for farm worker quarters as described in Future Land Use Policy 1.5.1-k and Housing Policy 1.4-d or grooms quarters as described in Future Land Use Policy 1.5.1-k; and

eb) that in cases of preserve areas that are contiguous to the associated development area, these preserves be held in common ownership and control by an HOA or other party for access by, and on behalf of, residents of the AgR-PDD or agricultural users, and operate under common management of an HOA or third party.

Agricultural Reserve Commercial and Mixed Use Planned Developments

2. **REVISE Policy 1.5.1-n: AGR-Traditional Marketplace Development.** The Agricultural Reserve Traditional Marketplace Development (AgR-TMD) is a planned development intended to provide an integrated mix of uses. The AgR-TMD differs from that AgR-MUPD by requiring a minimum of 51% of the commercial square footage to be designed as a “Traditional Main Street” that allows the floors above the shops and offices to have the potential to be used for either housing or residential/business as live/work spaces. An Agricultural Reserve Traditional Marketplace Development (AgR-TMD) shall meet the following requirements:

1. The total land area shall be a minimum of 25 acres;
2. The Development Area shall be contained in one compact area not to exceed 40 percent of the gross acreage less right-of-way as shown on the Thoroughfare Identification Map. The development area shall contain uses normally associated with commercial development such as the street system, parking and water retention areas;
3. The Development Area shall be located within 1/4 mile of the intersections of Lyons Road and Atlantic Avenue or Lyons Road and Boynton Beach Boulevard;
4. The Development Area shall meet the Ag Reserve Design Elements;
5. The Preserve Area shall consist of at least 60 percent of the gross acreage less right-of-way identified on the Thoroughfare Identification Map. Up to 10 percent of the preserve area may be located within the development area for use as open space or public greenspace. Any portion of the preserve area not located within the development area:
 - a) may be contiguous with the developed area;
 - b) shall be utilized for crop production; pasture; equestrian purposes; or serve water management purposes per one or more of the following:

- 1) ~~if designated by the South Florida Water Management District (SFWMD) as either a Water Preserve Area, or certified by the SFWMD as serving regional water management purposes;~~ or
 - 2) ~~to serve regional water management purposes as certified by either Lake Worth Drainage District (LWDD), Lands owned by LWDD as of May 5, 2021 shall be limited to lands adjacent to existing preserve areas and limited to a maximum 276.509 acres of preserved area identified in Zoning Application PDD/DOA 2021-0122. For the purposes of this provision, adjacent includes lands separated from existing preserves by lands owned by LWDD. Any changes to the LWDD-owned lands provisions above shall require a majority-plus-one vote of the Board of County Commissioners;~~ or
 - 3) ~~for water management purposes not directly related to the AgR-TMD if approved by the Department of Environmental Resources Management, and managed for environmental resource values.~~
- c) ~~Accessory agricultural structures such as barns and pump structures shall be permitted~~
 - d) ~~Agricultural support uses such as processing facilities, and the like shall not be accommodated in the protected area of an AgR-TMD;~~
 - e) ~~nor shall new residential uses shall not be accommodated thereon except for farm worker quarters or grooms quarters as described in Future Land Use Policy 1.5.1-o or,~~
 - f) ~~civic purposes such as schools, libraries, or fire stations if located east of State Road 7 and adjacent to a development area, for civic purposes such as schools, libraries, or fire stations.~~

Exhibit 2 Correspondence



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July 7, 2021

Palm Beach County Planning Commission
2300 N. Jog Rog Road
West Palm Beach, Florida

Submitted via email: PZB-PlanPOC@pbcgov.org; pbehn@pbcgov.org; kfischer@pbcgov.org; ibulkeley@pbcgov.org

Re: July 9, 2021 Agenda Item III.A.2.a – Lake Worth Drainage District Proposed Amendments to the Future Land Use Element of the Comprehensive Plan.

Dear Chair Lori Vinikoor and Palm Beach County Planning Commissioners:

On behalf of our clients, 1000 Friends of Florida (“1000 Friends”) and Sierra Club Loxahatchee Group (“Sierra Club”), please kindly accept these comments to the Palm Beach County Board of County Planning Commission (“PBCPC”) and include them in the public record for the July 9, 2021, meeting regarding Agenda Item III.A.2.a – Lake Worth Drainage District Proposed Amendments to the Future Land Use Element of the Comprehensive Plan. 1000 Friends and Sierra Club disagree with the interpretation of the Board of County Commissioners at its May 5, 2021, hearing that, under the current text of the Comprehensive Plan, canal rights-of-way owned by a public agency and utilized for rights-of-way purposes are eligible to be AGR-PDD Preserve Acres for acreage calculations or for density purposes to facilitate the transfer of development rights. Accordingly, while Sierra Club and 1000 Friends agree with the text of the above referenced amendment, so far as it clarifies the initial intent of the Comprehensive Plan to limit the use of canals as preserve areas, we respectfully disagree that Zoning Application PDD/DOA-2021-0122 be contemplated in the text amendments and respectfully request that the associated exemption to the amendment for the 276.509 acres identified in that application be removed. The language is tantamount to *post hoc* amendment to justify the BOCC’s erroneous May 5th decision.

1000 Friends is a statewide 501(c)(3) smart growth advocacy nonprofit organization with a substantial number of members that live and work in Palm Beach County. Similarly, Sierra Club is a national 501(c)(3) grassroots environmental organization with the Loxahatchee Group comprised of a substantial number of members that live and work in Palm Beach County. The members of both non-profit environmental organizations advocate for preservation of agricultural resources that are a much-needed buffer for the environmental vitality and character of the communities without encroachment of increased high-density residential, commercial, mixed-uses, and industrial uses.

All members of these organizations residing within Palm Beach County are afforded the protections of the Palm Beach County Comprehensive Plan and will be directly affected by any interpretations that contradict the Objectives and Policies that govern the Agricultural Reserve.

As stated in opposition to the May 5, 2021 item, 1000 Friends and Sierra Club have long raised concerns to the BOCC regarding the allowance of developmental overreach in the Ag Reserve that summarily reduces, segregates, or altogether eliminates agriculture, conservation, and very low-density residential development in favor of higher density developments that are in direct contradiction to the spirit of the Ag Reserve. The very purpose of this Tier, composed of unique farmlands and wetlands, is to ensure preservation primarily for agricultural use. My clients continue to believe that Objective 1.5, as written, specifically and unambiguously prohibits the removal of 276.127 acres of AGR-PUD preserve (row crops) and replacement with 63 segments of LWDD owned canal rights-of-way totaling 281.96 acres which are utilized for right-of-way purposes. Despite that belief, the additional language of the text amendment reiterating the obvious protections is not objectionable.

However, the amendment language exempting canal rights-of-way contemplated specifically in application PDD/DOA-2021-0122 creates an internal inconsistency within the Comprehensive Plan and subverts the 60/40 requirement for clustered development within the AGR-PUD. The existing Comprehensive Plan language requires the County “support, preserve, perpetuate bona-fide agricultural and open space uses of the Property, and to preserve any environmentally significant upland or wetland habitats.” Additionally, it requires the County to *preserve* the unique farmland and wetlands in order to preserve and enhance agricultural activity, environmental and water resources, and open space within the Agricultural Reserve Tier by limiting uses to *agriculture and conservation with residential development restricted to low densities and non-residential development limited to uses serving the needs of farm workers and residents of the Tier*. Creating an exemption for PDD/DOA-2021-0122 violates that language, results in an internal inconsistency, and violates years of precedent denying such applications.

Thank you for your time and consideration of these comments. We respectfully request that the Zoning Commission approve the amendments tightening the protection to the AGR-PUD without any language exempting PDD/DOA-2021-0122 from the requirements thereof.

Robert N. Hartsell

Robert N. Hartsell, Esq
Robert N. Hartsell, P.A.

CC: 1000 Friends of Florida, Sierra Club