

# ***Alliance of Delray Residential Associations, Inc.***

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- *Serving more than 100 Communities between the Everglades and the Ocean in south Palm Beach County.*
- *Working Toward Sustainable Development*
- *Applying Resilience Thinking to Our Natural Resources*

August 15, 2022  
Palm Beach County Board of County Commissioners  
301 North Olive Avenue  
West Pam Beach, Florida 33401

Re: Indian Trails Grove - Agricultural Reserve Exchange (LGA 2022-021)

Dear Commissioners:

On August 12, 2022, the Palm Beach County (PBC) Planning Commission denied the application for the Indian Trails Grove (ITG) - Agricultural Reserve (AGR) Exchange (LGA 2022-021). As for the Staff's report, *res ipsa loquitur*, recommending denial citing a litany of flaws in the justification for such an exchange.

The Alliance agrees with the Planning Commission and County Staff. 7 years ago, the AGR Roundtable discussions took place. As a result, changes were made to accommodate the farmers and to correct some perceived inequities involving landowners in the AGR, keeping in mind the intent of the Master Plan and always considering parcels west of State Road 7/441 to be of maximum importance for conservation and water preservation. The current proposal would severely impact the goal of protecting these precious lands.

Further, the deviations from the intent of the plan for the AGR Tier are great with this application to wit, decreasing the proportional requirement of preservation/development from 80/20 to 60/40 west of State Road 7/441. This further emphasizes the Applicant's digression from the intent and understanding of the specialists who designed the Master Plan to cause the least amount of impact on water resources, considering that the Everglades and South Florida Water Management District lands are steps away from the proposed severely increased density of development.

Recently, Staff recommended, and the Planning Commission advised, to provide for an Essential Housing Element to be instituted along Atlantic Avenue and Boynton Beach Boulevard. This would allow for multifamily housing and workforce housing units to be built within the AGR. Staff and the Planning Commission *did not* recommend the land west of State Road 7/441 for use to create essential, multifamily, or workforce housing.

The AGR boundaries were established considering climate/weather elements. Exchanging preserve lands from outside of the Tier in northern PBC where the climate is colder than the AGR in certain growing seasons is not an equitable exchange. Some tropical fruits that are grown in the AGR cannot be grown above the Tier. Chinese vegetables are grown in the Rural Tier but keep in mind that it snows in China.

The inequities resulting from this project are clear. The residents of the AGR and south PBC already pay taxes for flood protection and water supply. By relinquishing preserve lands within the AGR, the south County taxpayers would essentially be paying the bill for services that benefit others and this is clearly a non-equitable arrangement. Further, other landowners west of State Road 7/441 would request similar overlays leading to greater stress on environmentally sensitive lands and water resources.

The PBC Board of County Commissioners voted to retain an expert to examine the impact the increased density of development would have west of State Road 7/441 prior to the approval of any further development. It is the Alliance's position that this is a wise decision. The Alliance requests the time to evaluate and comment on the expert's report prior to action on any application considered by the Board of County Commissioners.

Thank you for your attention to this most serious matter.

Sincerely,

*Lori Vinikoor*

Dr. Lori Vinikoor, President

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