

Bradford Soil and Water Conservation District Performance Review

Prepared for:
The Florida Legislature's
Office of Program Policy Analysis
and Government Accountability
(OPPAGA)

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Table of Contents

Key Takeaways	2
I. Background	3
I.A: District Description	3
I.B: Creation and Governance.....	6
I.C: Programs and Activities	7
I.D: Intergovernmental Interactions	8
I.E: Resources for Fiscal Year 2022 – 2023	9
II. Findings	11
II.A: Service Delivery	11
II.B: Resource Management.....	14
II.C: Performance Management.....	17
II.D: Organization and Governance.....	19
III. Recommendations	21
IV. District Response	26

Key Takeaways

- Bradford Soil and Water Conservation District’s Board of Supervisors is highly active, typically meeting twice per month.
- Bradford Soil and Water Conservation District monitors local water levels and water quality; conducts trials of low-cost conservation techniques; and performs conservation education, outreach, and advocacy activities.
- Bradford Soil and Water Conservation District does not have any staff and is funded entirely by an annual allocation from the Bradford County Board of County Commissioners.
- Bradford Soil and Water Conservation District’s operations are not currently guided by a strategic plan or other goals and objectives, and the District does not evaluate its performance using performance measures and standards.

I. Background

Pursuant to s. [189.0695\(3\)\(b\)](#), *Florida Statutes*, Mauldin & Jenkins (“M&J”) was engaged by the Florida Legislature’s Office of Program Policy Analysis and Government Accountability to conduct performance reviews of the State’s 49 independent soil and water conservation districts. This report details the results of M&J’s performance review of Bradford Soil and Water Conservation District (“Bradford SWCD” or “District”), conducted with a review period of October 1, 2020, through April 30, 2024.

I.A: District Description

Purpose

Chapter [582](#) of the *Florida Statutes* concerns soil and water conservation within the State of Florida. The chapter establishes the processes for creation, dissolution, and change of boundaries of districts; the qualifications, election, tenure, and mandatory meetings of District Supervisors; the oversight powers and duties of the Florida Department of Agriculture and Consumer Services (“FDACS”); and the powers and purpose of the districts. The District’s statutory purpose, per s. [582.02](#), *Florida Statutes*, is “to provide assistance, guidance, and education to landowners, land occupiers, the agricultural industry, and the general public in implementing land and water resource protection practices. The Legislature intends for soil and water conservation districts to work in conjunction with federal, state, and local agencies in all matters that implement the provisions of [ch. [582](#), *Florida Statutes*].”

Prior to April 2024, the District’s website stated that “the mission of the Bradford Soil and Water Conservation District is to provide the administration of programs to conserve soil and improve water quality and quantity on private lands in Bradford County.” The District uploaded new Mission, Vision, and Purpose Statements to its website in April 2024. The Mission Statement defines the District’s mission as being “to promote the appropriate and efficient use of soil and water resources, protect water quality, prevent floodwater and sediment damage, preserve wildlife, protect public lands, and promote the health, safety, and general welfare of the people of Bradford County.” The Vision Statement defines the District’s vision as being “to perform duties listed as Powers of Districts and Supervisors in [s. [582.20](#), *Florida Statutes*].” The Purpose Statement defines the District’s purpose as being “to provide assistance and education to landowners, land occupiers, the agricultural industry, and the general public in implementing land and water resource protection policies.” Supervisors adopted the Mission, Vision, and Purpose Statements by vote at the April 16, 2024, meeting.

Service Area

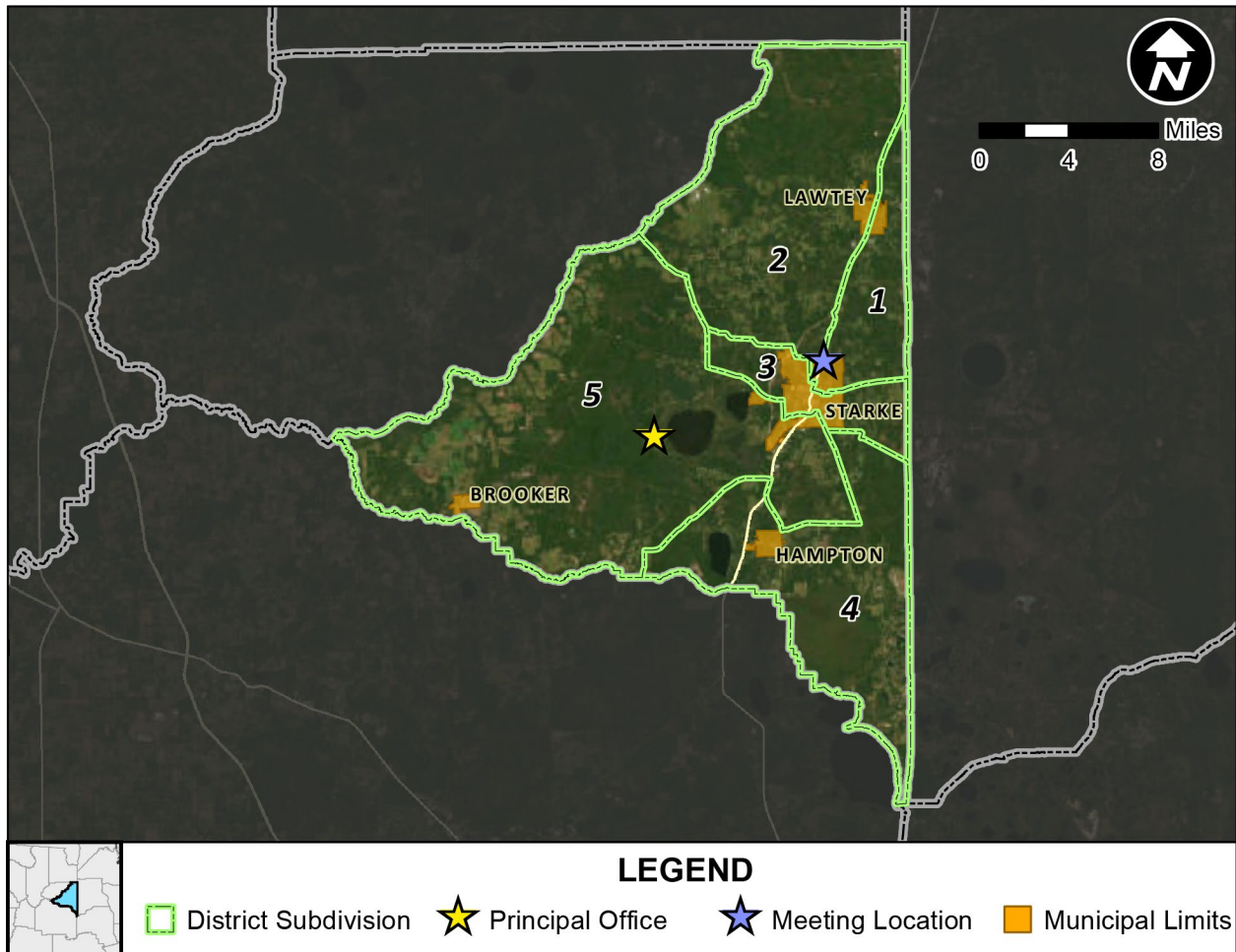
When the District was established in 1950, the service area included the entirety of Bradford County and the current borders and territory remain the same. The District’s service area includes unincorporated Bradford County; the County’s three cities and one town;¹ and part or all of Graham Conservation Area, New River Conversation Area, and Santa Fe Swamp Conservation Area. The District is bounded on the north by Baker County, east by Clay County, south by Alachua County, and west by Union County. The total area within the District is 300 square miles, with 294 square miles of land and six square miles of water.

¹ Cities: Hampton, Lawtey, Starke. Town: Brooker.

The District’s registered address is located at 14167 Southwest 101st Avenue, Starke, Florida 32091. The District meets at 2266 North Temple Avenue, Starke, Florida 3201 – the University of Florida’s Institute of Food and Agricultural Sciences Extension office in Bradford County.

Figure 1 is a map of the District’s service area, based on the map incorporated by reference in Rule [5M-20.002\(3\)\(a\)3](#), *Florida Administrative Code*, showing the District’s boundaries, electoral subdivisions, municipalities within the service area, the District’s principal office, and the District’s meeting location.

Figure 1: Map of Bradford Soil and Water Conservation District



(Source: Bradford County GIS, Florida Commerce District Profile)

Population

Based on the Florida Office of Economic and Demographic Research population estimates, the population within the District’s service area was 27,389 as of April 1, 2023.

District Characteristics

Bradford SWCD is located in north central Florida and is home to a diversified economy with significant mining, corrections, transportation and logistics, silviculture,² and manufacturing industries.³ The United States Census Bureau reports that over 98% of the District's land area is rural. Per the United States Department of Agriculture's 2022 Census of Agriculture, the District's small agricultural sector is mainly composed of hay and forage, aquaculture, and cattle production. The entirety of the District is included within the Basin Management Action Plan ("BMAP")⁴ for the Santa Fe River Basin.⁵

The District is located within the Northern Highlands physiographic province and slopes downward from Trail Ridge, which runs along the District's eastern border, to the Santa Fe River Valley in the District's southwest. Trail Ridge is an extended series of quartz sand hills that run north-south from South Georgia into north-central Florida and is home to highly valuable mineral sands that are a source of titanium and rare earths. The mild slopes that characterize the central part of the District's topography produce numerous slow-flowing streams, large swampy areas, and shallow lakes that may contribute to flooding in the area during heavy rains or hurricanes. In the District's south and west, the Santa Fe and New Rivers have carved valleys into the District's clay/sand soils. The District's geology creates a series of highly productive aquifers that feed several springs on the Santa Fe River just downstream of the District's western border,⁶ including Santa Fe Springs, Hornsby Spring, and the Santa Fe River Rise.⁷ Mining and processing of mineral sand deposits on Trail Ridge produces waterborne byproducts that, if not properly managed, may impact the District's water resources.

² Silviculture is the commercial cultivation of timber.

³ North Florida Economic Development Partnership. n.d. "Bradford County Major Employers." *North Florida Economic Development Partnership website*. Accessed May 17, 2024. https://nflp.org/images/properties/Bradford_County_Major_Employers.pdf.

⁴ The Florida Department of Environmental Protection defines a Basin Management Action Plan as "a framework for water quality restoration that contains local and state commitments to reduce pollutant loading through current and future projects and strategies."

⁵ Florida Department of Environmental Protection. n.d. *Impaired Waters, TMDLs, and Basin Management Action Plans Interactive Map*. Accessed 05 07, 2024. <https://floridadep.gov/dear/water-quality-restoration/content/impaired-waters-tmdls-and-basin-management-action-plans>.

⁶ Rupert, Frank R. 1987. *Geology of Bradford County, Florida*. Geological Report, Tallahassee: Florida Geological Survey. <https://original-ufdc.uflib.ufl.edu/UF00001016/00001/13x>.

⁷ Florida Department of Environmental Protection. n.d. "Map of Florida's Springs Categorized by Magnitude." *Florida Department of Environmental Protection*. Accessed May 7, 2024. <https://floridadep.gov/fgs/fgs/media/map-floridas-springs-categorized-magnitude>.

I.B: Creation and Governance

Bradford SWCD was chartered on March 13, 1950, as the Bradford Soil Conservation District, following a successful referendum of local landowners and subsequent petition to the Florida State Soil Conservation Board.⁸ The District was created under the authority of the State Soil Conservation Districts Act (herein referred to as “ch. [582](#), *Florida Statutes*”).⁹ The Florida Legislature amended ch. [582](#), *Florida Statutes*, in 1965 to expand the scope of all soil conservation districts to include water conservation, which renamed the District to the Bradford Soil and Water Conservation District.¹⁰

In interviews, a Supervisor asserted that the District was inactive and had no Supervisors for a period of time, before it was reformed in 2005 by the director of the University of Florida’s Institute of Food and Agricultural Sciences Extension service in Bradford County, with its first elections being held in 2006. The District has not provided M&J with documentation detailing the District’s dissolution or reformation.

The District is governed by a Board of Supervisors. Supervisors are unpaid, nonpartisan public officials elected by the voters within the service district. M&J analyzed the Supervisors’ elections, appointments, and qualifications within the in-scope period pursuant to applicable *Florida Statutes*.¹¹

As of this report, the District has five Supervisors. M&J has reviewed affidavits affirming that the Supervisors from seats 2, 3, 4, and 5 meet the qualifications for office established in s. [582.19\(1\)](#), *Florida Statutes*. The Bradford County Supervisor of Elections was not able to provide the District with a similar affidavit prepared by the Supervisor currently occupying seat 1. During the review period (October 1, 2020, through April 30, 2024), there have been five vacancies on the Board, as illustrated in Additional assessment of the District’s electoral patterns is detailed in section II.D: Organization and Governance of this report.

The District has only had five supervisors in office on four occasions during the review period: from February 2021 to April 2021, from July 2021 to August 2021, from April 2022 to January 2023, and from November 2023 to the present. Additional assessment of the District’s electoral patterns is detailed in section II.D: Organization and Governance of this report.

⁸ Florida State Soil Conservation Board. 1951. *Biennial Report of the State Soil Conservation Board: January 1, 1949 - December 31, 1950*. Biennial report, Tallahassee: Florida State Soil Conservation Board.

⁹ s. [582](#), *Florida Statutes* (1939), available online as ch. [19473](#), *Laws of Florida*

¹⁰ Ch. [65-334](#), *Laws of Florida*.

¹¹ Including s. [582.15](#), *Florida Statutes*, s. [582.18](#), *Florida Statutes*, s. [582.19](#), *Florida Statutes*, Rule. [5M-20.002](#), *Florida Administrative Code*, and Ch. [2022-191](#), *Laws of Florida*.

Figure 2: Supervisor Terms

Seat	FY21				FY22				FY23				FY24			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	
1	S.M.	Tom Germano												Walt Westcott		
2	Janice Morton						Tara Singletary		Sherman Carnes							
3	Paul McDavid			Oksun Burks												
4	P.W.		Amy Morie													
5	Paul Still															

Legend for FY21

Steven Milligan (S.M.)
Pam Whittle (P.W.)

(Source: Bradford County Supervisor of Election records, Board of Supervisors meeting minutes)

During the review period, the District met 53 times¹² and met the mandatory meeting requirement of s. 582.195, Florida Statutes, to meet at least once per calendar year with all five Supervisors for both 2022 (May and October) and 2023 (December). M&J has determined that the District only provided proper notice for a portion of the Board meetings held during the review period.

Neither Bradford County nor the in-district municipalities have adopted any local regulations for the District.

I.C: Programs and Activities

The following is a list of programs and activities conducted by the District within the review period (October 1, 2020, through April 30, 2024), along with a brief description of each program or activity. The District’s programs and activities will be described in detail in section II.A: Service Delivery of this report.

- Water Level Monitoring and Advising
 - The District collects water level measurements at selected locations in waterways throughout its service area to evaluate floodwater management practices.
- Water Quality Monitoring
 - The District collects water quality measurements at selected locations in waterways throughout its service area to monitor the impact that Trail Ridge mining operations may have on the District’s water resources.
- Invasive Plant Management Trials
 - The District carries out invasive plant management activities on a plot of publicly owned land in the City of Starke and monitors the resulting impact to evaluate the effectiveness of low-cost methods of managing invasive plant infestations.

¹² Meetings occurred in January, February, March, April, May, June, July, August, September, November (x2), and December 2021; January (x3), February, March (x2), April (x2), May, June (x2), July (x2), August, September (x2), October (x2), November, and December (x2) 2022; January (x2), February, March, April, May (x2), June (x2), July, August (x2), September (x2), October, November, and December (x2) 2023; and January and February 2024.

- Conservation Educational Programs
 - Conservation Educational Programs provide natural resources conservation-related elementary, secondary, and adult education within the community.
- Outreach Events
 - The District uses community events as an opportunity to provide outreach to local landowners and agricultural stakeholders by explaining the programs and services offered by the United States Department of Agriculture’s Natural Resources Conservation Service, Suwannee River Water Management District, and other organizations that fund conservation practices.
- Conservation Advocacy
 - The District uses the water level and water quality data that it collects to advocate for various conservation-related causes, including calling for improvements to how the Bradford County Board of County Commissioners and Suwannee River Water Management District manage floodwaters in the District’s service area and engaging with applications for the issuance and renewal of mining permits on Trail Ridge.

I.D: Intergovernmental Interactions

The following is a summary of federal agencies, State agencies, and/or public entities with which the District interacts, including the means, methods, frequency, and purpose of coordination and communication.

Bradford County Board of County Commissioners (“BBoCC”)

The District’s primary source of funding is an annual allocation that it receives from BBoCC. The District submits an annual funding request as part of BBoCC’s budget process and receives the funds in a single check each BBoCC fiscal year. BBoCC representatives attend District Board of Supervisors (“Board”) meetings on rare occasion, averaging approximately once per year during the review period.

United States Department of Agriculture’s Natural Resources Conservation Service (“NRCS”)

The District is involved with outreach events to promote NRCS conservation cost sharing programs and other programs to fund agricultural conservation improvements in the District’s service area. NRCS staff occasionally attend District Board meetings, having attended 17 of the 53 meetings held by the District during the review period. NRCS staff keep Supervisors informed regarding NRCS activity in the District’s service area and update Supervisors about changes to NRCS program availability.

University of Florida’s Institute of Food and Agricultural Sciences Extension Service in Bradford County (“UF/IFAS Extension”)

The District holds meetings and stores records at the UF/IFAS Extension facilities in Starke. The District occasionally collaborates with UF/IFAS Extension staff on outreach or educational events, but UF/IFAS Extension staff rarely attend Board meetings.

Suwannee River Water Management District (“SRWMD”)

The District is involved with outreach events to promote SRWMD conservation cost-sharing programs and other programs to fund agricultural conservation improvements in the District’s service area. SRWMD staff occasionally attend District Board meetings to update Supervisors about relevant activities and changes to SRWMD policies, averaging less than once per year during the review period.

Florida Department of Agriculture and Consumer Services’ Florida Forest Service (“FFS”)

The District is involved with outreach events to promote FFS conservation cost-sharing programs and other programs to fund silvicultural improvements in the District’s service area. FFS representatives attended District meetings once during the review period to update the District on FFS activities relevant to the District’s mission. The District does not regularly work with FFS to provide any programs or promote any services.

Starke City Commission

The District has requested funding from the Starke City Commission several times during the review period but has not received an allocation. The District operates invasive plant management operations in parcels of land owned by the Starke City Commission.

I.E: Resources for Fiscal Year 2022 – 2023

The following figures quantify and describe the District’s resources for Fiscal Year 2022 – 2023 (October 1, 2022, through September 30, 2023, herein referred to as “FY23”). Figure 3 shows the total amount of revenues, expenditures, and long-term debt maintained by the District in FY23. Figure 4 shows the number of paid full-time and part-time staff, contracted staff, and volunteers by employer. Figure 5 shows the number and type of vehicles, number and type of major equipment, and number and type of facilities owned, leased, and used by the District.

Figure 3: FY23 Finances

	Revenues	Expenditures	Long-term Debt
Total for Year	\$5,000	\$5,016	\$0

(Source: District financial records)

Figure 4: FY23 Program Staffing

	Full-time Staff	Part-time Staff	Contracted Staff	Volunteers
District-employed Staff	0	0	0	0
Board of County Commissioners-employed staff	0	0	0	0
Total	0	0	0	0

(Source: Written communications and interviews with Supervisor)

Figure 5: FY23 Equipment and Facilities

	Number	Ownership Status	Type(s)
Vehicles	0		
Major Equipment	0		
Facilities	2	1 owned by the University of Florida’s Institute of Food and Agricultural Sciences extension; 1 is a private residence	1 meeting space / record storage space; 1 registered address / small equipment storage space

(Source: Written communications and interviews with Supervisor)

II. Findings

The Findings sections summarize the analyses performed, and the associated conclusions derived from M&J's analysis. The analysis and findings are divided into four subject categories:

- Service Delivery
- Resource Management
- Performance Management
- Organization and Governance

II.A: Service Delivery

Overview of Services

M&J has identified the following programs and activities that the District has performed during the review period (October 1, 2020, through April 30, 2024):

Water Level Monitoring and Advising

The District collects water level measurements at selected locations in waterways throughout its service area, including around the Lake Samson Water Level Control Structure and at the Suwannee River Water Management District ("SRWMD") drainage project at Alligator Creek, to evaluate floodwater conditions. The District uses the water level measurements to evaluate the performance of various flood management programs and flood control infrastructure projects located throughout the District's service area.

Water Quality Monitoring

The District collects water quality measurements from selected waterways throughout its service area to monitor the impact that Trail Ridge mining operations may have on the District's water resources. The District is particularly focused on measurements of uncommon pollutants that may be released by mining operations, such as iron. The District uses the measurements to evaluate the efficacy of pollutant management practices utilized by mining companies.

Invasive Plant Management Trials

The District carries out invasive plant management activities on a plot of publicly owned land in the City of Starke and monitors the resulting impact to evaluate the effectiveness of low-cost methods of managing invasive plant infestations. The District is currently in its third year of invasive plant management activities at the study site. The District's management practices primarily consist of manual mechanical removal, with infrequent herbicide use for particularly resilient species.

Conservation Educational Programs

The District commonly partners with the University of Florida's Institute of Food and Agricultural Sciences Extension service in Bradford County ("UF/IFAS Extension"), 4-H, and the Bradford County Agricultural Fair to provide its conservation educational programs. These programs are designed to provide natural resources conservation-related early childhood education, elementary and secondary education, postsecondary education, special education, job training, career and technical education, and/or adult education, usually administered by an education agency or institution.¹³ M&J has identified the following Conservation Educational Programs carried out by the District during the review period:

¹³ Adapted from [34 CFR § 99.3](#) (2024)

Bradford County Agricultural Fair Youth Competition Sponsorships

The District sponsors youth educational competitions held by the UF/IFAS Extension and 4-H at the annual Bradford County Agricultural Fair. The District sponsors overall operations of the youth competitions as well as specific competitions for swine, cattle, goat, and small animal production.

National Association of Conservation Districts (“NACD”) Poster Contest

The NACD Poster Contest provides students with a chance to compete and have their art displayed nationally. The contests are open to kindergarten through 12th grade students from the District’s service area, separated into two- or three-grade divisions. These contests use a common conservation-related prompt set by NACD. The winners of the District-level contests advance to compete at the regional, State, and national levels. The District has not offered the competition since FY21.

Community Agriculture Education Programs

The District works with the UF/IFAS Extension to provide programs that support community agriculture programs in a historically African American community in the City of Starke. The services provided include a community garden, access to home and garden composting systems, and access to rain barrels for collecting water for use to irrigate the community garden and home gardens.

Outreach Events

The District uses community events as an opportunity to provide outreach to local landowners and agricultural stakeholders by explaining the programs and services offered by the United States Department of Agriculture’s Natural Resources Conservation Service, SRWMD, and other organizations that fund conservation practices. During the review period, outreach events hosted or participated in by the District include:

- Bradford County Agricultural Fair
- Interagency Cost-Share Workshops

Conservation Advocacy

The District uses the water level and water quality data that it collects to advocate for various conservation-related causes. The District uses the water level data that it collects to evaluate the flood control performance of the Bradford County Board of County Commissioners (“BBoCC”)-operated Lake Samson Water Level Control Structure and SRWMD’s drainage canal project at Alligator Creek and propose changes to the relevant water management practices. The District also uses its collected water quality measurements to evaluate the impact that mining operations on Trail Ridge has on waterways across the District’s service area. The District has discussed using negative water quality evaluations as the basis of comments on and/or objections to mining permit applications and renewals.

Analysis of Service Delivery

The District's delivery of water level monitoring, water quality monitoring, and invasive plant management trial programs align with s. [582.20\(1\)](#), *Florida Statutes*, which permits soil and water conservation districts to "conduct surveys, studies, and research relating to soil and water resources." The District's invasive plant management trial programs also align with s. [582.20\(2\)](#), *Florida Statutes*, which permits soil and water conservation districts to "conduct... projects for the conservation, protection, and restoration of soil and water resources." The District's conservation education programs align with s. [582.20\(7\)](#), *Florida Statutes*, which permits soil and water conservation districts to "provide, or assist in providing, training and education programs" that support the District's conservation efforts. The District's outreach events align with the soil and water conservation district purpose statement established in s. [582.02\(4\)](#), *Florida Statutes*. The District's water level monitoring, water quality monitoring, and invasive plant management trial programs are highly reliant on the time and skills of a single Supervisor. This one Supervisor is the primary person responsible for measuring water levels, collecting water samples, running water quality analyses, conducting invasive plant management activities, and compiling the data produced by these programs. Alternative service delivery models, such as distributing the District's workload across the other Supervisors, recruiting volunteers to assist with service delivery, or partnering with another organization to carry out some of the District's tasks, may improve the quality of service delivered by the District by reducing the District's reliance on a single individual. Adopting an alternate service model that distributes the District's workload across a group of individuals may also improve the District's service delivery by increasing redundancy and helping mitigate the risk to the District's data collection process resulting from a single Supervisor performing the most critical data collection and processing tasks.

A Supervisor stated to M&J that the District's lack of staff makes it difficult for the District to effectively seek out grant funding while complying with all provisions of the Florida Sunshine Law.¹⁴ Obtaining staff support, even part-time staff support, may grant the District access to new funding sources to support the introduction of new programs and expansion of existing District programs.

The conservation advocacy activities that the District undertook during the review period, which are limited to evaluating and commenting on BBoCC and SRWMD flood management practices, align with ss. [582.20\(1\)](#) and [582.02\(4\)](#), *Florida Statutes*.

Recommendation: The District should consider modifying its processes for providing its water level monitoring, water quality monitoring, and invasive plant management trial programs to reduce these programs' reliance on the labor of a single Supervisor. The District could consider partnering with a local university, college, or community college with a conservation-related program to provide opportunities for students to participate in community-based conservation programming.

Recommendation: The District should consider developing a staffing model that allows the District to access low-cost staffing resources to support the District's pursuit of grant funding opportunities. Potential staffing models include working with neighboring soil and water conservation districts to split the costs of an employee, working with BBoCC to gain part-time use of a BBoCC employee with the requisite skills, or identifying interns from relevant programs at a local institution of higher education.

¹⁴ s. [286.011](#), *Florida Statutes et seq.*

Comparison to Similar Services/Potential Consolidations

SRWMD monitors and reports water levels and water quality measured at monitoring stations located on several rivers and lakes throughout the District's service area. SRWMD provides the collected data to water managers, researchers, and the public through its website. Much of SRWMD's process of recording and preparing water level and water quality measurements is automated. The District's water level and quality monitoring efforts largely focus on specific features of particular interest to the District, such as waterways that are smaller than those typically monitored by SRWMD, although several of the District's water level and quality monitoring locations are duplicative of SRWMD's water level quality and monitoring stations. The District's water quality monitoring efforts focus on water quality features of particular interest to the District that are not reported by SRWMD, such as dissolved iron levels.

While the District's collection of these focused data is useful and informs the District's activities, the District does not currently have an automated method of providing data to the public, such as a portal on the District's website. As SRWMD already has created tools for communicating water level and quality data on its website, the District may benefit from partnering with SRWMD to distribute the data that the District collects on conditions of interest within the District's service area. Additionally, the District may benefit from utilizing existing SRWMD data where it is available and utilizing some of the automations that SRWMD has implemented in its water level and quality data collections processes.

Recommendation: The District should consider developing a partnership with SRWMD that allows the District to use or adapt SRWMD's existing tools for reporting water level and water quality data to provide the public with access to water level and water quality data collected by the District. Additionally, the District should consider working with SRWMD to explore how the District may be able to benefit from water level and water quality data collection automation methods that SRWMD has implemented. Additionally, the District should review its current water level monitoring locations to take advantage of data already reported by SRWMD and reduce duplicative water level monitoring.

II.B: Resource Management

Program Staffing

The District has not had any employees (full-time or part-time), contract staff, or regular volunteers during the review period.

Equipment and Facilities

Vehicles

The District has not owned or operated any vehicles during the review period.

Facilities

The District has held meetings and stored records at the University of Florida's Institute of Food and Agricultural Sciences Extension office in Starke ("UF/IFAS Extension") for the entirety of the review period. The District does not have an agreement with the UF/IFAS Extension for this use of meeting and record storage space. However, this does not appear to be an issue at this time.

The District’s registered address is the home address of one of the District’s Supervisors. The District also stores its small equipment at this Supervisor’s residence. The District is currently assessing disposition means for this equipment, and has not indicated any plans to purchase additional equipment.¹⁵ As such, M&J does not see the current storage means as an issue at this time.

Figure 6: Ownership Status of District Facilities by Type

Facility Type	Ownership Status			
	FY21	FY22	FY23	FY24
Registered Address / Small Equipment Storage	Private residence used by the District at no cost	Private residence used by the District at no cost	Private residence used by the District at no cost	Private residence used by the District at no cost
Meeting Space / Record Storage	Office owned by UF/IFAS Extension and used by the District at no cost	Office owned by UF/IFAS Extension and used by the District at no cost	Office owned by UF/IFAS Extension and used by the District at no cost	Office owned by UF/IFAS Extension and used by the District at no cost

(Source: District Board meeting minutes, Florida Department of Commerce profile, Interview with Supervisor)

Major Equipment

The District has not owned or operated any major equipment during the review period.

Current and Historic Revenues and Expenditures

The District’s primary source of revenues during the review period was its annual allocation from the Bradford County Board of County Commissioners (“BBoCC”). The District reports a small reserve funded through minimal revenues from other sources, including interest and sales of wire compost bins produced by a District Supervisor, although receipt of these revenues is outside of the review period. District Board of Supervisors (“Board”) meeting minutes, District financial records, and the District’s Annual Financial Reports, as reported to the Florida Department of Financial Services, suggest that non-BBoCC revenues likely did not total more than several dozen dollars during the financial review period (October 1, 2020, through December 31, 2023). Figure 7 shows the District’s recorded revenues during the financial review period.

Figure 7: Revenues by Source and Fiscal Year

Revenue Source	Total Revenues			
	FY21	FY22	FY23	FY24 (through 12/31/2023)
BBoCC	\$2,870	\$5,000	\$5,000	\$5,000

(Source: District financial records)

¹⁵ A Supervisor reported that the equipment was sold at auction after the end of the review period on April 30, 2024.

The District prepares a budget request for BBoCC during each budgeting cycle and receives its annual allocation in a check. The District does not have any intergovernmental agreements with BBoCC that govern the allocation process or establishes reporting requirements. The District uses its annual BBoCC allocation to pay all expenses, including costs of delivering the District’s programs, operating expenses, travel costs, and dues and fees. Figure 8 details the District’s expenditures by program and fiscal year.

Figure 8: Expenditures by Program and Fiscal Year

Program or Activity	Total Expenditures			
	FY21	FY22	FY23	FY24 (through 12/31/2023)
Operating Expenses	\$417	\$1,766	\$2,430	\$571
Water Level Monitoring	\$802	\$812	\$361	\$120
Water Quality Monitoring	\$345	\$356	\$456	\$235
Invasive Plant Management Trials	\$31	\$686	\$490	\$71
Education Programs	\$50	\$130	\$30	\$331
Education Programs	\$1,250	\$1,250	\$1,250	\$1,250
Total Expenditures	\$2,895	\$5,000	\$5,017	\$2,578

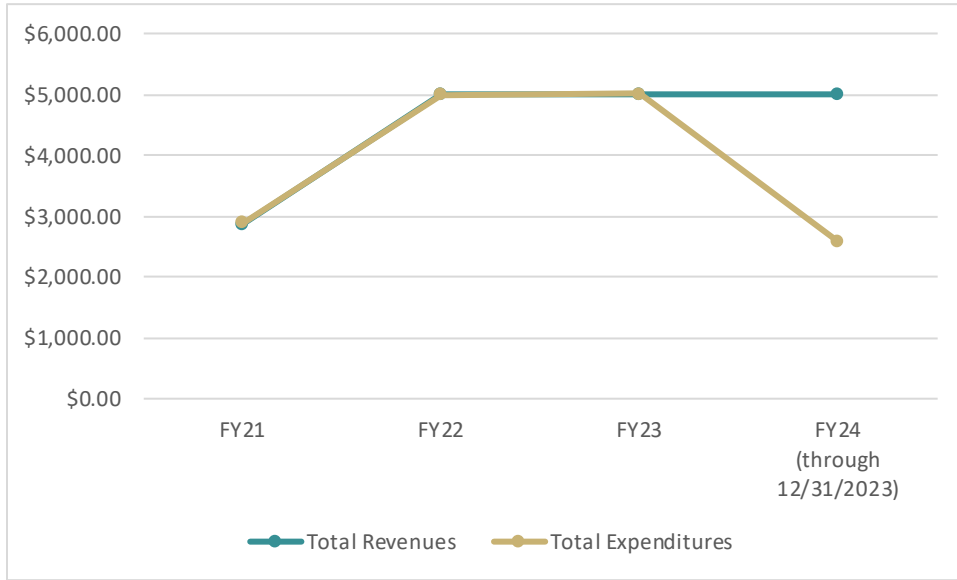
(Source: District financial records)

Recommendation: The District should consider reviewing its currently established policies and procedures governing the recording of financial assets and financial transactions to ensure all transactions are properly recorded. The District should consider maintaining a ledger that includes the starting balance of the District’s bank account each fiscal year and all record debits and credits to that account over the course of the fiscal year. The District’s ledger should be used to ensure the Annual Financial Reports are complete and consistent before submission to the Florida Department of Financial Services each fiscal year.

Trends and Sustainability

The District’s BBoCC allocation increased from \$2,870 in FY21 to \$5,000 per year for the remainder of the financial review period. Per Board meeting minutes, BBoCC increased the District’s allocation at the District’s request. The District’s total expenditures have closely tracked its revenues throughout the financial review period, increasing from FY21 to FY22 to match the increased BBoCC allocation and remaining nearly unchanged from FY22 to FY23. Figure 9 shows the District’s revenues and expenditures across the financial review period. As annual revenue is received one time at the beginning of the fiscal year, all anticipated FY24 revenue is recognized at the beginning of the fiscal year.

Figure 9: Revenues vs. Expenditures



(Source: District financial records)

The District relies almost exclusively on its BBoCC allocation for funding and maintains only a small reserve. Per the District’s financial records, its reserve stood at \$624 on March 1, 2024, which is only enough to cover the District’s current level of expenditures for a few months. So long as the District continues to receive a BBoCC allocation similar to the one that it currently receives, the District will have sufficient revenues to pay its current level of expenditures. Changes to BBoCC’s financial state or funding priorities pose a serious risk to the District’s ability to continue to deliver services. Given the District’s low level of reserves, even a significant delay in the processing of BBoCC’s allocation may deplete the District’s reserves and interrupt the District’s ability to fund its activities in the short term.

Recommendation: The District should consider identifying and pursuing funding opportunities from additional funding sources to reduce its reliance on its BBoCC allocation. Additional funding sources may include the Starke City Commission and grants from the United States Department of Agriculture, National Association of Conservation Districts, or other public or private conservation-related entities.

II.C: Performance Management

Strategic and Other Future Plans

Per the District’s Board of Supervisors (“Board”) minutes from the review period and interviews with a Supervisor, the District does not currently have a strategic plan.

Recommendation: The District should consider developing and then adopting a strategic plan that builds on the District’s purpose and vision. The strategic plan should not simply describe the District’s current programs, but rather reflect the District’s long-term and short-term priorities based on the needs of the community and in response to changing land use patterns within the District’s service area.

Goals and Objectives

Per the District’s Board meeting minutes from the review period and interviews with a Supervisor, the District does not currently maintain written or unwritten goals and objectives.

Recommendation: The District should consider writing and then adopting a set of goals and objectives that align with the District’s statutory purpose, as defined in s. [582.02\(4\)](#), *Florida Statutes*, and the Board’s vision and priorities as established in the District’s strategic plan. The goals and objectives should contemplate measurable progress, capturing the results of the District’s efforts and ensuring a consistent direction forward for the District’s future prioritization of programs and activities.

Performance Measures and Standards

Per the District’s Board meeting minutes and interviews with a Supervisor, the District does not currently track performance measures or evaluate the District’s performance against standards.

Recommendation: The District should consider identifying performance measures and standards as part of the development of a new strategic plan. The District should then track the identified performance measures against established standards and use the collected data to monitor the District’s performance, evaluate progress towards the goals and objectives that the District adopts, and support future improvements to the District’s service delivery methods.

Analysis of Goals, Objectives, and Performance Measures and Standards

The District does not have any goals or objectives and does not track any performance measures or standards. The District’s lack of goals and objectives inhibits the Supervisors’ ability to develop District policy based on a clear, agreed-upon future state. The District’s lack of performance measures and standards limits the District’s ability to analyze its performance in an objective fashion and prevents outside individuals or organizations from adequately evaluating District activities. The lack of goals, objectives, performance measures, and standards may pose a particular challenge to new Supervisors, who do not have access to the resources needed to fully understand the factors guiding the Board’s past decisions and to develop an understanding of the of the District’s current operations. As stated earlier in this section of the report, M&J recommends that the District consider writing and adopting a set of goals and objectives and identifying and tracking performance measures and standards.

Annual Financial Reports and Audits

The District is required per s. [218.32](#), *Florida Statutes*, to submit an Annual Financial Report to the Florida Department of Financial Services within nine months of the end of each fiscal year (*i.e.*, June 30, or nine months after September 30). The District submitted its FY21, FY22, and FY23 Annual Financial Reports to the Florida Department of Financial Services within the compliance timeframe.

Per s. [218.39](#), *Florida Statutes*, the District is not required to submit an annual financial audit report, as its annual revenues and combined expenditures and expenses are below the \$50,000 threshold for each year of the review.

Performance Reviews and District Performance Feedback

Per the District’s Board meeting minutes from the review period and interviews with a Supervisor, the District has not conducted any performance reviews or collected any feedback from District stakeholders during the review period.

Recommendation: The District should consider implementing a system for collecting feedback from local partner agencies and residents of the District’s service area with whom the District has worked, and creating a process to systematically review feedback. The District should consider using the findings from the review of feedback to refine the District’s service delivery methods.

II.D: Organization and Governance

Election and Appointment of Supervisors

Supervisors are required by s. [582.19\(1\)\(b\)](#), *Florida Statutes*, to sign an affirmation that they meet certain residency and agricultural experience requirements. These signed affirmations are required of both elected and appointed Supervisors.”

M&J reviewed election records on the Bradford County Supervisor of Elections’ (“BCSoE”) website, candidate records provided by BCSoE in response to a public records request, Board of Supervisors (“Board”) meeting minutes, and a District-created Supervisor list to assess the District’s Supervisor eligibility to hold office. All five Supervisor positions came up for election in 2022, as required. A new Supervisor in seat 2 and the incumbent Supervisors in seats 3, 4, and 5 were elected in the 2022 election, while seat 1 was left vacant. All four candidates elected in the 2022 election filed affidavits affirming that they met the eligibility requirements established in s. [582.19\(1\)](#), *Florida Statutes*. A new Supervisor was appointed to fill the seat 1 vacancy in November 2023. M&J requested an eligibility affidavit from the Supervisor appointed to seat 1 as part of a public records request to the BCSoE, but this affidavit was not provided. As a result, M&J cannot verify whether the Supervisor appointed to seat 1 meets the eligibility requirements established in s. [582.19\(1\)](#), *Florida Statutes*.

Recommendation: The District should consider collaborating with the Bradford County Supervisor of Elections to ensure that appointed Supervisors complete the affidavits necessary to document each Supervisor’s compliance with the requirements of s. [582.19\(1\)](#), *Florida Statutes*.

Notices of Public Meetings

Section [189.015](#), *Florida Statutes*, requires that all Board meeting minutes be publicly noticed in accordance with the procedures listed in ch. [50](#), *Florida Statutes*. This chapter has been amended twice during the review period, and M&J reviewed for compliance with the governing statute in effect at the time of each meeting date and applicable notice period.

In interviews, a Supervisor for the District reported that the District submits meeting announcements to the editor of the *Bradford Telegraph*, a local newspaper, for publication. The District provided M&J with newspaper clippings showing that meeting notices were published for 42 meetings scheduled during the review period, including 30 meetings that M&J can confirm were held and 12 meetings for which M&J has requested but has not received confirmation that they were held. M&J also searched [floridapublicnotices.com](#), the State of Florida’s designated repository for public notice records, and did not identify meeting notices posted in the *Bradford Telegraph* for any additional meetings held during the review period.

The District provides a list of its meeting dates to the Association of Florida Conservation Districts, which works with the Florida Department of Agriculture and Consumer Services’ Office of Agricultural Water Policy to post meeting notices in the *Florida Administrative Register*. M&J identified notices posted in the *Florida Administrative Register* for 15 meetings scheduled during the review period, including eight meetings that M&J can confirm were held, three meetings that M&J can confirm were not held, and four meetings for which M&J requested but has not received confirmation that they were held. The District inconsistently provides notice of its meetings on the District website, although the notices posted on the website are not consistently kept up to date.

M&J's review concluded that the District notices did not consistently meet the requirements of the version of ch. [50, Florida Statutes](#), in effect at the time of each meeting date and applicable notice period. Prior to January 2023, ch. [50, Florida Statutes](#), required any board located in a county with a county-wide newspaper to publish meeting notices in that newspaper. The District only met this requirement for some meetings held in 2021 and 2022, as not all meetings were published in the local newspaper. Since January 2023, ch. [50, Florida Statutes](#), has also permitted publication of meeting notices on a publicly accessible website (such as the Florida Administrative Register) as long as the board publishes a notice once a year in the local newspaper identifying the location of meeting notices and stating that any resident who wishes to receive notices by mail or e-mail may contact the board with that request. The District only partially met the requirements for meetings held in 2023 and 2024, as not all meetings were published in the local newspaper.

Failure to provide appropriate notice in full accordance with ch. [50, Florida Statutes](#), may deny the public an opportunity to attend meetings and participate in District business. Violation of this chapter of the Florida Statutes may subject District Supervisors and staff to penalties, including fines, fees, and misdemeanor charges, as outlined in s. [286.011, Florida Statutes](#). Additionally, business conducted at such meetings may be invalidated.

Recommendation: The District should consider reviewing its meeting notice procedures to verify compliance with s. [189.015](#) and ch. [50, Florida Statutes](#). The District should retain records that document its compliance with applicable statutes.

Retention of Records and Public Access to Documents

The District was able to provide all records requested in accordance with s. [119.021, Florida Statutes](#). While some District financial records and Board meeting minutes and agendas are posted on the District's website, minutes and agendas are not consistently posted and financial information is not regularly updated.

Recommendation: The District should consider updating its procedures for maintaining the District's website to help ensure that meeting minutes and agendas are regularly posted, financial records are kept up-to-date, and other pages are updated as needed.

III. Recommendations

The following table presents M&J’s recommendations based on the analyses and conclusions in the Findings sections, along with considerations for each recommendation.

Recommendation Text	Associated Considerations
<p>The District should consider modifying its processes for providing its water level monitoring, water quality monitoring, and invasive plant management trial programs to reduce these programs’ reliance on the labor of a single Supervisor. The District could consider partnering with a local university, college, or community college with a conservation-related program to provide opportunities for students to participate in community-based conservation programming.</p>	<ul style="list-style-type: none"> • Potential Benefits: Adjusting the District’s service delivery methods to reduce its reliance on a single Supervisor’s labor and expertise will make the District’s ability to deliver services more resilient to changes in the District’s Supervisor makeup, changes in Supervisor priorities, and changes in Supervisor availability. • Potential Adverse Consequences: Adopting alternative service delivery methods may result in less experienced Supervisors or volunteers performing District work for a period of time, which may reduce the District’s efficiency or output quality until the new workers gain additional experience in their roles. • Costs: None • Statutory Considerations: None
<p>The District should consider developing a staffing model that allows the District to access low-cost staffing resources to support the District’s pursuit of grant funding opportunities. Potential staffing models include working with neighboring soil and water conservation districts to split the costs of an employee, working with the Bradford County Board of County Commissioners to gain part-time use of a Bradford County employee with the requisite skills, or identifying interns from relevant programs at a local institution of higher education.</p>	<ul style="list-style-type: none"> • Potential Benefit: Finding a way to obtain staff resources with the District’s limited budget would allow for the District to pursue grant funding sources to fund new programs and/or the expansion of the District’s current programs. • Potential Adverse Consequences: None significant • Costs: None • Statutory Considerations: Depending on the staffing model selected, Supervisors may need to approve intergovernmental agreements with other soil and water conservation districts or with the Bradford County Board of County Commissioners.

Recommendation Text	Associated Considerations
<p>The District should consider working to develop a partnership with Suwannee River Water Management District (“SRWMD”) that allows the District to use or adapt SRWMD’s existing tools for reporting water level and water quality data to provide the public with access to water level and water quality data collected by the District. Additionally, the District should consider working with SRWMD to explore how the District may be able to benefit from water level and water quality data collection automation methods that SRWMD has implemented. Additionally, the District should review its current water level monitoring locations to take advantage of data already reported by SRWMD and reduce duplicative water level monitoring.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Partnering with SRWMD to take advantage of its existing data reporting and collection tools would allow the District’s efforts to reach a significantly wider audience of researchers, regulators, and citizens than it currently does and may allow for the District to conduct its water level and quality monitoring activities in a more efficient manner. ● Potential Adverse Consequences: None significant ● Costs: Potential costs of integrating the District’s data collection tools with SRWMD’s reporting systems and/or implementing SRWMD’s data collection automation tools ● Statutory Considerations: The Supervisors may need to approve an intergovernmental agreement or other contract with SRWMD governing the District’s use of SRWMD tools and access to SRWMD systems.
<p>The District should consider reviewing its currently established policies and procedures governing the recording of financial assets and financial transactions to ensure assets and transactions are properly recorded. The District should consider maintaining a ledger that includes the starting balance of the District’s assets each fiscal year and all increases or decreases to that balance over the course of the fiscal year. A ledger can range from utilizing sophisticated accounting software to maintenance of an Excel spreadsheet, with a new tab for each fiscal year. The District’s ledger should be used to complete the Annual Financial Reports with appropriate clarity before submission to the Florida Department of Financial Services each fiscal year.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Recording transactions in a ledger will help ensure that the District has a complete understanding and record of its financial activities, is transparent, can easily prepare required financial reports, and can respond to records requests regarding finances as needed ● Potential Adverse Consequences: None significant ● Costs: If the District chooses to implement a commercial accounting software system, the District would have costs related to use of that software package ● Statutory Considerations: None

Recommendation Text	Associated Considerations
<p>The District should consider identifying and pursuing funding opportunities from additional funding sources to reduce its reliance on its BBoCC allocation. Additional funding sources may include the Starke City Commission and grants from the United States Department of Agriculture, National Association of Conservation Districts, or other public or private conservation-related entities.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Pursuing additional funding sources will reduce the District’s reliance on its BBoCC allocation and allow the District to continue to function in the event that BBoCC decides to reduce the District’s allocation or if there are delays in processing the District’s BBoCC allocation. Additionally, acquiring additional funding will allow the District to fund additional programs and/or expansion of its current programs. ● Potential Adverse Consequences: None significant ● Costs: None ● Statutory Considerations: None
<p>The District should consider developing and then adopting a strategic plan that builds on the District’s purpose and vision. The strategic plan should not simply describe the District’s current programs, but rather reflect the District’s long-term and short-term priorities based on the needs of the community and in response to changing land use patterns within the District’s service area.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Developing and adopting a strategic plan will require the District to consider and define an organized, cohesive set of plans for the coming years and will provide a document that the District’s current and potential future Supervisors and staff can reference to guide the District’s operations over the coming years. ● Potential Adverse Consequences: None significant ● Costs: None ● Statutory Considerations: Supervisors will need to adopt any strategic plan.
<p>The District should consider writing and then adopting a set of goals and objectives that align with the District’s statutory purpose, as defined in s. 582.02(4), <i>Florida Statutes</i>, and the Board’s vision and priorities as established in the District’s strategic plan. The goals and objectives should contemplate measurable progress, capturing the results of the District’s efforts and ensuring a consistent direction forward for the District’s future prioritization of programs and activities.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Developing, writing, and adopting a set of comprehensive goals and objectives will help the District’s current and future Supervisors and staff to better understand the District’s intentions and will help to prioritize projects. ● Potential Adverse Consequences: None significant ● Costs: None ● Statutory Considerations: Supervisors will need to adopt any goals and objectives.

Recommendation Text	Associated Considerations
<p>The District should consider identifying performance measures and standards as part of the development of a new strategic plan. The District should then track the identified performance measures against established standards and use the collected data to monitor the District’s performance, evaluate progress towards the goals and objectives that the District adopts, and support future improvements to the District’s service delivery methods.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Identifying performance measures and establishing performance standards will enable the District to objectively evaluate the performance of its various programs, enhancing the Supervisors’ ability to oversee and manage the District’s service delivery. The District can also use collected performance measures to refine its service delivery models to improve the level of service that it is able to provide or reduce costs. ● Potential Adverse Consequences: None significant ● Costs: Implementing this recommendation may cause the District to incur minor data collection and storage fees. ● Statutory Considerations: None
<p>The District should consider implementing a system for collecting feedback from local partner agencies and residents of the District’s service area with whom the District has worked, and creating a process to systematically review feedback. The District should consider using the findings from the review of feedback to refine the District’s service delivery methods.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Implementing a system to collect feedback from partner agencies and residents will give the District an additional source of information to use in evaluating the performance of the District’s programs and may help the District to identify and/or evaluate potential improvements to the District’s service delivery methods. ● Potential Adverse Consequences: None significant ● Costs: Implementing this recommendation may cause the District to incur minor data collection and storage fees. ● Statutory Considerations: None
<p>The District should consider collaborating with the Bradford County Supervisor of Elections to ensure that appointed Supervisors complete the affidavits necessary to document each Supervisor’s compliance with the requirements of s. 582.19(1), <i>Florida Statutes</i>.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Working with the Bradford County Supervisor of Elections to collect eligibility affidavits from all elected and appointed Supervisors will help ensure that the Supervisors are in compliance and have documented their compliance with the eligibility criteria set in s. 582.19(1), <i>Florida Statutes</i>. ● Potential Adverse Consequences: None ● Costs: None ● Statutory Considerations: None

Recommendation Text	Associated Considerations
<p>The District should consider reviewing its meeting notice procedures to verify compliance with s. 189.015 and ch. 50, <i>Florida Statutes</i>. The District should retain records that document its compliance with applicable statutes.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Implementing proper meeting notice policies will help ensure that the District is compliant with s. 189.015 and ch. 50, <i>Florida Statutes</i>, which protects Supervisors and staff from potential consequences of violating notice requirements established in s. 286.011, <i>Florida Statutes</i>, and protects actions taken during meetings from being invalidated on procedural grounds related to meeting notice. Properly noticing meetings also promotes increased public engagement with District operations. ● Potential Adverse Consequences: None significant ● Costs: Properly noticing the District’s meetings will require the District to pay to run public notice statements in the local newspaper ● Statutory Considerations: None
<p>The District should consider updating its procedures for maintaining the District’s website to help ensure that meeting minutes and agendas are regularly posted, financial records are kept up-to-date, and other pages are updated as needed.</p>	<ul style="list-style-type: none"> ● Potential Benefit: Ensuring that meeting minutes, meeting agendas, financial records, and other relevant information on the District’s website are kept up-to-date will ensure that members of the public have easy access to District records and can participate in the District’s activities and decision-making process. ● Potential Adverse Consequences: None significant ● Costs: None ● Statutory Considerations: None

IV. District Response

Each soil and water conservation district under review by M&J was provided the opportunity to submit a response letter for inclusion in the final published report. Bradford SWCD's response letter is provided on the following pages.



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Mail: 14167 SW 101st Ave, Starke, FL 32091
Phone: 904.368.0291 email: p.still.bswcd@gmail.com

**Bradford Soil & Water Conservation
District Supervisors**

District 1:

Walt Westcott
Starke, FL

District 2 / Vice-Chair:

Sherman Carnes
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District 3 / Secretary:

OK Sun Burks
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District 4 / Chair:

Amy Morie
24686 US Hwy 301 N, Lawtey, FL 32058
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District 5 / Treasurer:

Paul Still
14167 SW 101st Ave, Starke, FL 32091
p.still.bswcd@gmail.com
904 368-0291

August 7, 2024

Subject: **Bradford Soil and Water Conservation to draft OPAGGA Report**

To: The Florida Legislature's Office of Program Policy Analysis and Government Accountability (OPPAGA) Mauldin & Jenkins, CPAs c/o Kate Russell, Director

Submitted electronically

The Bradford Soil and Water Conservation District has approved the attached report addressing

In summation, two areas of concern are addressed:

1. Background clarifications
2. Findings clarifications

As voted on in meeting on August 6th 2024, the board approves by vote the following response. The board appreciates the recommendations outlined and will take these under advisement in the interest of better serving BSWCD constituents.

Respectfully,

A handwritten signature in black ink that reads "Amy E Morie". The signature is written in a cursive, flowing style.

Amy Morie, chair

Bradford Soil and Water Conservation District



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1. Background clarifications

District Characteristics: Page 5: The Bradford Soil and Water Conservation District is disappointed that the suggested edits to this section were not made, the most important change being the addition of forestry to agricultural activities and the sentence “Forestry represents the most significant agriculture activity in Bradford County.” While silviculture was added as a significant industry, failing to list it as part of “the District’s small agricultural section” overlooks the importance of this industry in the county. For perspective, in their Bradford County Community Wildfire Protection Plan 2020 update, the Bradford County Sheriff’s office stated that “forested land owned by Rayonier Forest Resources... totals over 60,650 acres or nearly 95 square miles occupying 32% of Bradford County.”

Creation and Governance: Page 6, Paragraph 2 implies the District was dissolved and reformed. As outlined in suggested edits, the District was on hiatus but did not officially dissolve.

Seats and Districts clarification: Prior to the upcoming 2024 elections, Supervisors who ran for seats were to be elected county wide. Since 2006 there has been no contested BSWCD seat, so no Supervisor has been on a ballot. The Statue change that requires Supervisors to live in the Commission District in which they reside has required existing Supervisors to change the number of the Area they represent to the number of the District where they live, i.e., withdraw from their current seat and run for or be appointed to their newly designated seat. For BSWCD, because two Supervisors lived in the same District but were assigned different Area numbers there will be a vacant position starting in January 2025. One sitting Supervisor will have to be appointed to the District where he resides.

Intergovernmental Interactions:

P 8 - 9: Absent from the report but to be noted, BSWCD also started partnering in 2023 with the Florida Fish and Wildlife Conservation Commission (FWC) on landowner outreach for cost shares and technical help. As a result of this groundwork, FWC staff presented at the inaugural Landowner Assistance event (held on February 15, 2024 by BSWCD) as a direct effort to better engage our partners and landowners and connect the resources available. FWC was also an integral part of BSWCD’s planning for the first landowner tour held April 5, 2024.

P 8 : states “University of Florida’s Institute of Food and Agricultural Sciences Extension Service in Bradford County (“UF/IFAS Extension”) The District holds meetings and stores records at the UF/IFAS Extension facilities in Starke. The District occasionally collaborates with UF/IFAS Extension staff on outreach or educational events, but UF/IFAS Extension staff rarely attend Board meetings.” In practice, UF/IFAS Extension Bradford County’s agents and staff regularly update BSWCD board members on programs in the community and these updates are shared at meetings by BSWCD board members in lieu of direct reporting, which would be difficult as meetings currently are scheduled after hours for this IFAS office. In addition, neighboring Union County (which has no SWCD at present) is also providing program updates for BSWCD to share. By cultivating collaboration over the past 2 years, BSWCD has found both IFAS units to be strong collaborators for landowner outreach and a valuable part of BSWCD’s 2023 planning team for Arbor Day, Landowner Outreach, and other events held in 2024.



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Resources for Fiscal Year 2022 – 2023:

Page 9 Figure 4: As unpaid elected officials, Florida's Soil and Water Conservation District supervisors are volunteers that perform the duties of and carry out programs for the District. The reporting format does not have a section to address this contribution, so this should potentially be counted in Figure 4 so that the value of service of District officials is acknowledged and quantified in OPPAGA reviews. For example, in 2023, Bradford County's District Supervisors volunteered approximately 2,520 hours of service to the community, equivalent to the donation of \$74,113* to the residents of Bradford County.

* Based on Florida value of volunteer time for 2022: <https://independentsector.org/wp-content/uploads/2023/04/Value-of-Volunteer-Time-by-State-2001-2022.pdf>

Page 10 Figure 5: There is no definition of major equipment. During the review period the BSWCD had equipment valued at over \$1,000 per item.

2. Findings clarifications

Analysis of Service Delivery:

Page 13 Paragraph 2: The grant notice, application drafting, award, and delivery can take two to three years. Bills passed and proposed in recent years by Florida Legislators that would abolish are significantly alter the form of Soil and Water Conservation Districts make applying for grants difficult because there can be no certainty that the District will be able to complete the required grant work products.

Page 14 paragraph 2: The BSWCD monitoring sites do not duplicate the SRWMD's sites.

Resource Management: Page 14 paragraph 4: One Supervisor volunteers 20 to 40 hours a week to carry out the District's programs and management. Other Supervisors volunteer 10 to 40 hours a month. As noted earlier, the voluntary contribution of Supervisor's time is not accounted for in the reporting and is an important and overlooked contribution to Florida's counties and the state.

Meeting Notices Page 19 – 20: "The District provides a list of its meeting dates to the Association of Florida Conservation Districts, which works with the Florida Department of Agriculture and Consumer Services' Office of Agricultural Water Policy to post meeting notices in the Florida Administrative Register. M&J identified notices posted in the Florida Administrative Register for 15 meetings scheduled during the review period, including eight meetings that M&J can confirm were held, three meetings that M&J can confirm were not held, and four meetings for which M&J requested but has not received confirmation that they were held. The District inconsistently provides notice of its meetings on the District website, although the notices posted on the website are not consistently kept up to date." (Also Page 7: "M&J has determined that the District only provided proper notice for a portion of the Board meetings held during the review period.")

BSWCD clarification on meeting notices:

- Website notices: Due to a change in service providers and urls (from <https://district.afcd.us/bradfordsoilandwater> to bradfordsoilandwater.org) by AFCD on or around 10/20/2023, records of prior meeting notices on BSWCD's website do not exist. A BSWCD supervisor was



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informed at AFCD training prior to this date that this change in urls was not mandatory. BSWCD was given no advance notice of any planned date of implementation and was not aware the change was made until 10/20/223 when the website could not be found for BSWCD's planned maintenance. After no reply from AFCD or their new provider, on 11/14/203, another request was made. It was then confirmed that complete data from the prior website was not backed up or preserved during the transition in accordance with Florida statutes and sunshine law. Had BSWCD been informed of the impending change, all measures would have been taken to preserve this information. BSWCD did iterate this to the department in an email on 11/16/2024, stating *"- it appears nothing was saved from the old site before it was replaced with the new site (and inaccurate info). Initial information we received gave us no warning of the old site being removed before the new site was active. Given the timing of the OPAGGA audit, this creates a substantial work burden on districts to immediately rebuild their sites. I don't know what the rollout plan was here, but I find the lack of information disappointing and would like to know why there was no better effort to convey the process and timeline to all members of the districts and allow them to better prepare for this transition."*

- 2023 FAR: After extensive research and records requests, the board acknowledges that no FAR notice of all meetings dates for 2023 was published. The information is collected as all dates for the coming year, and arranged for publishing by the Association of Florida Conservation Districts (AFCD) as part of AFCD's contractual agreement with the Florida Department of Agriculture and Consumer Services/Office of Agricultural Water Policy (FDACS/OAWP) to assist Florida's Soil and Water Conservation Districts and serve as liaison between the districts and the state in certain areas of district statutory obligations, including FAR publications.
 - In emails from AFCD obtained by BSWCD, references are made to reminders sent to districts on 1/9/23, 2/9/23, 4/1/23, and 4/10/23. The actual requests from AFCD were not included in the response to the records request, indicating that AFCD did not copy BSWCD on these reminders. Records of BSWCD supervisors do not include these reminders and support the position that AFCD did not include BSWCD of these requests. The information was emailed by board member Paul Still to AFCD on 4/12/2023
 - AFCD's spreadsheet was updated and provided to FDACS on 4/14/.2023 to include Bradford's dates as well as a few other counties dates. AFCD stated on 10/30/2023 that these were submitted to FDACS on 5/9/2023. These 2023 dates were not published.
 - Records of FAR publications for AFCD's Area 1 and 2 counties - representing 31 of Florida's districts - reveals that overall FAR publications dropped significantly in 2023. It is unclear why this reduction occurred (Fig. 1).



Fig. 1: FAR Publications 2017 – 2024: AFCD Areas 1 and 2

Area 1		2017	2018	2019	2020	2021	2022	2023	2024	Area 2		2017	2018	2019	2020	2021	2022	2023	2024
1	Escambia	1	1	1	1	0	1	1	1	1	Madison	1	1	1	1	1	1	1	1
2	Blackwater (Santa Rosa)	1	1	0	0	0	1	0	1	1	Hamilton	1	1	1	1	0	0	0	0
3	Yellow River (Okaloosa)	1	1	1	1	1	1	0	1	1	Suwannee	1	0	1	1	1	1	1	0
4	Choctawhatchee River (Walton)	1	0	0	1	0	1	1	1	1	Lafayette	0	0	0	0	0	0	0	0
5	Holmes Creek (Holmes)	1	1	1	1	0	0	1	1	0	Dixie	1	1	1	1	1	1	1	1
6	Orange Hill (Washington)	1	1	1	1	1	0	0	0	0	Santa Fe (Columbia)	1	1	1	1	0	0	0	0
7	Jackson	1	1	1	1	1	1	0	1	1	Gilchrist	1	1	1	1	1	1	0	1
8	Chipota River (Calhoun/Liberty)	1	1	1	1	1	0	1	1	1	Levy	1	1	1	1	1	1	1	1
9	Tupelo (Gulf)	1	1	1	1	1	1	1	1	1	Bradford	1	1	1	1	1	1	0	1
10	Gadsden	1	1	1	1	1	1	1	1	1	Alachua	1	1	1	1	1	0	0	1
11	Franklin	1	1	1	1	1	1	1	1	1	Nassau	1	1	1	0	1	0	0	1
12	Leon	1	1	1	1	1	0	0	0	1	Duval	1	1	1	1	1	1	0	1
13	Wakulla	1	1	1	1	1	0	0	0	1	Clay	1	1	1	1	1	1	0	1
14	Jefferson	1	1	1	1	1	1	1	1	1	St. Johns	1	1	1	1	1	1	1	1
15											Putnam	1	1	1	1	1	1	1	1
16											Marion	1	1	1	1	1	1	1	1
17											Volusia	1	1	1	1	1	1	0	1
Area 1 total		14	13	12	13	10	9	8	12	Area 2 total		16	15	16	15	14	12	7	13

1 = Publication made 0 = no publication made

Source: Florida Administrative Register

- 2024 FAR: After discovering the lack of FAR records for 2023, the District increased diligence on ensuring the submission process was carried out by AFCD and FDACS. BSWCD submitted dates to FDACS and AFCD on 1/11/2024 with the request to be informed in any further information was needed. In February BSWCD noted a lack of publication for the 2024 year. BSWCD contacted FDACS on 3/7/2024 and was then informed on 3/13/2024 that our submission was incomplete as it lacked a phone number. As recently discovered through records requests, AFCD’s spreadsheet as recorded as early as January 9th lists Bradford’s address but not the BSWCD phone number. This information was present in previous version of the Districts Roster maintained by AFCD. Given no transfer of information had taken place between AFCD and BSWCD in this timeframe and AFCD has had correct contact info listed for Bradford in prior years rosters they have published, BSWCD concludes that AFCD likely entered incomplete information when transferring prior years information into their transmitted spreadsheet to FDACS. At no time until directly asking after delays was BSWCD informed of the delay or the reason thereof. Given the lack of formal process for meeting notice publication, BSWCD acknowledges a need for greater clarity in the interest of oversight and accountability.