

Peace River 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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Key Takeaways

- Peace River Soil and Water Conservation District’s Board of Supervisors meets jointly with the Board of Hardee Soil and Water Conservation District. The Peace River Soil and Water Conservation District’s Board has met quarterly within the review period (October 1, 2020, through April 30, 2024). District Supervisors discuss conservation needs within both districts and Hardee’s Best Management Practices Program.
- Peace River Soil and Water Conservation District does not maintain any programs or activities it conducts or participates in.
- Peace River Soil and Water Conservation District does not have any revenues, expenditures, or staff.
- Peace River Soil and Water Conservation District’s operations are not guided by a strategic plan or any formalized goal-setting process.

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 Peace River Soil and Water Conservation District (“Peace River 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*.”

The District identifies a mission statement on its website, which reads, “The mission of the Peace River 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 Desoto County.”

Service Area

When the District was established in 1944, the service area included Desoto County. The current borders and territory are identical to those of Desoto County.

The District’s service area includes unincorporated Desoto County and the County’s one city and one census-designated place.¹ The service area incorporates all of Bright Hour Watershed, Horse Creek Ranch Conservation, Halls Tiger Bay Ranch Agricultural and Conservation, Bob Paul Conservation, Wetlands Reserve Program, Fort Green Gopher Tortoise Long-term Recipient Site, Southwest Florida Water Management, Peace River State Forest, Grubb Ranch Agricultural and Conservation, Walco Conservation, Candy Bar Ranch Agricultural and Conservation, Rawls Ranch Conservation, Charlie Creek Cattle Company Agricultural and Conservation, and Deep Creek Preserve. The service area also incorporates part of Crews Groves Conservation.

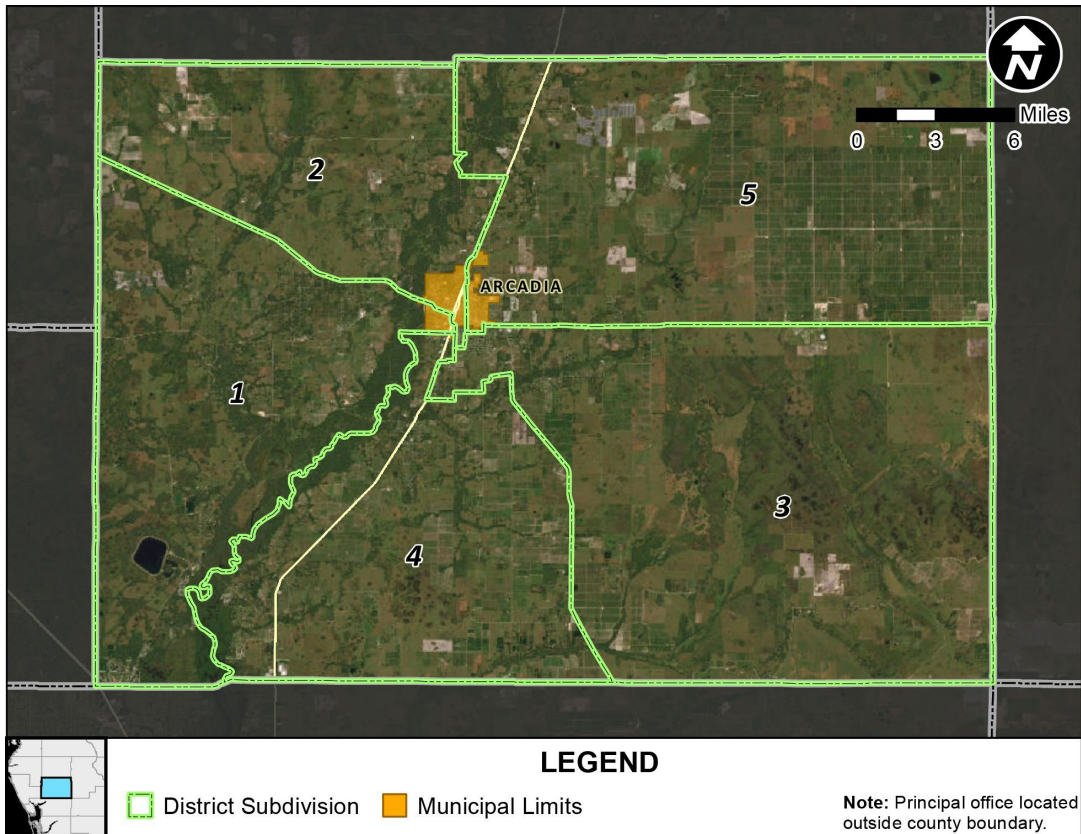
The District is bounded on the north by Hardee County, northwest by Manatee County, east by Highlands County, southeast by Glades County, south by Charlotte County, and west by Sarasota County. The total area within the District is 639 of square miles, with 637 square miles of land and 2.4 square miles of water.

¹City: Arcadia. Census-designated place: Southeast Arcadia.

The District’s primary office is located at 316 North 7th Avenue, Suite 101, Wauchula, FL 33873 — the Natural Resources Conservation Service (“NRCS”) Wauchula Service Center. This building is owned by the United States Department of Agriculture (“USDA”).

Figure 1 is a map of the District’s service area, based on the map incorporated by reference in [Rule 5M-20.002\(3\)\(a\)35, Florida Administrative Code](#), showing the District’s boundaries, electoral subdivisions, major municipalities within the service area, and the District’s principal office.

Figure 1: Map of Peace River Soil and Water Conservation District



(Source: Desoto County GIS, Florida Commerce Special District Profile)

Population

Based on the Florida Office of Economic and Demographic Research population estimates, the population within the District’s service area was 34,974 as of April 1, 2023.

District Characteristics

Peace River Soil and Water Conservation District boundaries are the same as DeSoto County. The District is located in the southwest part of Florida, is primarily rural and has a low population of around 35,000. The largest city, Arcadia, has a population just under 7,500.² The economy of the District supports employees in construction, healthcare, education, retail, professional services and agriculture.³ The District has 293,944 acres of farmland with \$218 million in revenues in 2022. Fruit crops represent 41% of 2022 revenue and citrus is the top crop. Nursery plants and sod contribute 26% of 2022 revenue, livestock 17%, and vegetable crops 15%. Pastureland represents 56% of the District farmland.⁴ DeSoto County adopted a Future Land Use Plan in December 2020 that included land preservation areas in the eastern part of the County.

The topography of the District is low along the Peace River watershed, which runs generally from north to southwest with higher elevations to the east of the river.⁵ The District is subject to several climate and environmental phenomena that can threaten agriculture, including hurricanes, flooding, and droughts. The climate is classified as humid subtropical, with hot, wet summers and mild, dry winters.

I.B: Creation and Governance

Peace River SWCD was chartered on April 10, 1944, as the Peace River Soil Conservation District, following a successful referendum of local landowners and subsequent petition to the Florida State Soil Conservation Board. The District was created under the authority of the State Soil Conservation Districts Act (herein referred to as “ch. [582, Florida Statutes](#)”).⁶ 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 Peace River Soil and Water Conservation District.⁷

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*.⁸

As of this report, the District has five Supervisors. Section [582.19\(1\), Florida Statutes](#), requires Supervisors to sign an affirmation that they met the residency and qualification requirements. M&J is not able to confirm the qualifications of any Supervisor who has served within the review period (October 1, 2020, through April 30, 2024). M&J requested documentation on Supervisor qualifications from the Desoto County Supervisor of Elections office, but no documentation has been provided as of this report. During the review period, there has been one vacancy on the Board, as illustrated in Figure 2. Additional assessment of the District’s electoral patterns is detailed in Section II.D (Organization and Governance) of this report.

² (Desoto Board of County Commissioners n.d.) https://desotobocc.com/images/planning_zoning/Comprehensive_Plan_Future_Land_Use_Element_Goals,_Objectives_and_Policies.pdf

³ (census.gov n.d.) https://data.census.gov/profile/DeSoto_County,_Florida?g=050XX00US12027#populations-and-people

⁴ (National Agricultural Statistics Service 2022) https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Florida/cp12027.pdf

⁵ (Southwest Florida Water Management District n.d.) <https://www.swfwmd.state.fl.us/watersheds/peace-river/where-the-river-begins>

⁶ s. [582, Florida Statutes](#) available online as ch. [19473, Laws of Florida](#)

⁷ Ch. [65-334, Laws of Florida](#)

⁸ 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	Trey Barnwell														
2							James Selph								
3	Ken Harrison														
4	Dan Ryals														
5	Phil Turner														

(Source: District Meeting Minutes)

The District had a vacancy from before the start of the review period to September 2022.

During the review period, the District met 11 times⁹ 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 (October) and 2023 (April). The District additionally met one time without a quorum. M&J has determined that the District did properly notice each meeting and workshop. Additional assessment of the District’s pattern of providing meeting notices and adherence to relevant statutes is detailed in Section II.D (Organization and Governance) of this report.

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

I.C: Programs and Activities

M&J did not identify any programs or activities conducted or participated in by the District during the review period (October 1, 2020, through April 30, 2024).

I.D: Intergovernmental Interactions

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

Hardee River Soil and Water Conservation District

Peace River SWCD has formed a collaborative relationship with Hardee River Soil and Water Conservation District (“Hardee SWCD”), through which they hold joint Board meetings and share an administrative assistant.

Natural Resources Conservation Service

The District holds its quarterly, joint Board meetings with Hardee SWCD in the Natural Resources Conservation Service (“NRCS”) Wauchula Service Center

⁹ Meetings occurred quarterly in January, April, July, and October 2021; January, April, and July 2022; January, April, July, and October 2023; January 2024.

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	\$10	\$0	\$0

(Source: District Bank Statements)

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: District Meeting Minutes)

Figure 5: FY23 Equipment and Facilities

	Number	Ownership Status	Type(s)
Vehicles	0	N/A	N/A
Major Equipment	0	N/A	N/A
Facilities	1	1 owned by United States Department of Agriculture	1 meeting space

(Source: District Meeting Minutes)

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 the following four subject categories:

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

II.A: Service Delivery

Overview of Services

M&J did not identify any programs or activities conducted or participated in by the District during the review period (October 1, 2020, through April 30, 2024).

Analysis of Service Delivery

The District does not maintain any programs or activities it conducts or participates in, so no findings regarding cost-reducing measures can be made.

Recommendation: The District should identify new sources of revenue to fund District outreach and conservation programming. The District could consider identifying grant opportunities from the U.S. Department of Agriculture, the Florida Department of Agriculture and Consumer Services, the National Association of Conservation Districts, or another public or private conservation-related entity. The District could also consider proposing an agreement with the Desoto County Board of County Commissioners to allow for the District to present an annual budget request, which would be subject to approval by the Board of County Commissioners.

Comparison to Similar Services/Potential Consolidations

The following soil and water conservation programs are provided by other public and nonprofit entities within the District's service area:

- The University of Florida's Institute of Food and Agricultural Sciences ("UF/IFAS") Desoto Extension partners with the local 4-H chapter to provide agriculture and conservation educational programming for youth within the District's service area, and serves as a resource between agriculture scientists and the local community.
- The Natural Resources Conservation Service ("NRCS") provides technical advice and data collection assistance to landowners implementing conservation practices.

The District has established a collaborative relationship with neighboring Hardee Soil and Water Conservation District ("Hardee SWCD"). The two districts hold joint Board meetings, and Hardee SWCD's Administrative Assistant also performs administrative tasks for Peace River SWCD. Hardee SWCD's BMP program also operates in Desoto County. According to District meeting minutes, Hardee SWCD has paid Association of Florida Conservation Districts ("AFCD") dues on behalf of Peace River SWCD on at least one occasion.

II.B: Resource Management

Program Staffing

The District does not independently employ or pay into the salary of any full-time, part-time, or contract employees. The Administrative Assistant for Hardee Soil and Water Conservation District also does administrative work like maintaining documentation for Peace River SWCD at no cost to the District.

Equipment and Facilities

Peace River SWCD does not own or rent any equipment or facilities. The District holds its joint, in-person Board meetings with Hardee Soil and Water Conservation District (“Hardee SWCD”) in the Natural Resources Conservation Service (“NRCS”) Wauchula Service Center at no cost to the District. The Administrative Assistant for Hardee SWCD, who performs some administrative tasks for Peace River SWCD, works out of this building through an Unfunded Cooperative Agreement between Hardee SWCD and NRCS.

Current and Historic Revenues and Expenditures

Peace River SWCD does not develop an annual budget or track annual revenue and expenditure data. In order to determine revenues and expenditures during the review period, M&J reviewed bank statements provided by the District. Peace River SWCD does not have revenues or expenditures, the only activity in the District’s bank account within the review period are small deposits to prevent the account from going dormant.

Trends and Sustainability

The District does not maintain activities or programs it conducts or participates in; the District also lacks revenues or expenditures. As such, the District’s current method of operating is sustainable only so long as it has Hardee SWCD to support it. Hardee SWCD has incurred expenditures on Peace River SWCD’s behalf within the review period, including paying Association of Florida Conservation Districts (“AFCD”) dues and paying the Administrative Assistant who supports both Districts.

II.C: Performance Management

Strategic and Other Future Plans

Peace River SWCD does not have an adopted strategic plan in place. Through an interview with District Supervisors, M&J identified informal short-term initiatives to increase the District’s involvement with local FFA and 4-H programs.

Recommendation: The District should consider developing and then adopting a strategic plan that builds on the District’s purpose and responsibilities defined in [s. 582.02\(4\), Florida Statutes](#). The strategic plan should not simply describe the District’s current programs or contracts, 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. A strategic plan does not need to be extensive as long as the document provides the District with direction for addressing the community’s needs.

Goals and Objectives

The District provided M&J with a list of short-term goals in response to this review. The District's short-term goals are to launch workshops to engage the community in conservation efforts, support local farmers, increase the District's involvement in FFA and 4-H programs, and improve the District's soil and water data collection capabilities. In the development of a strategic plan, the District will need to develop actionable goals focused on the District's outreach and education efforts.

Recommendation: The District should consider refining its existing set of goals and objectives to better 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

Peace River SWCD does not have any performance measures or standards, written or unwritten, related to program offerings that the District provides or activities that the District participates in.

Recommendation: The District should consider identifying performance measures and standards as part of the development of a strategic plan, such as number of interactions at outreach events. 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 toward the goals and objectives the District adopts, and support future improvements to the District's service delivery methods.

Analysis of Goals, Objectives, and Performance Measures and Standards

Peace River SWCD does not maintain a strategic plan or track performance measures. While District Supervisors have short-term goals and objectives including increased involvement with local youth associations and launch workshops, the goals and objectives are too broad for the District to communicate any meaningful progress.

As stated earlier in this section of the report, M&J recommends that the District consider revising its existing goals and objectives with actionable steps, and subsequently develop a strategic plan, performance measures and standards to provide the District direction and ensure that current and future programs and activities align with its intended statutory purpose, as defined in [s. 582.02\(4\), Florida Statutes](#).

Annual Financial Reports and Audits

Peace River SWCD 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 the District's fiscal year (September 30).

Pursuant to Section [218.32, Florida Statutes](#), the District is required to submit an Annual Financial Report every fiscal year by the compliance deadline nine months after the end of the fiscal year (June 30 of the following year). The District filed its FY21, FY22, and FY23 Annual Financial Reports within the compliance deadline.

Peace River SWCD does not meet the criteria in [s. 218.39, Florida Statutes](#), to require the District to submit an annual financial audit report, as the District's annual revenues and combined expenditures and expenses are below the \$50,000 threshold, the lowest requirement threshold for special districts.

Performance Reviews and District Performance Feedback

During the review period, Peace River SWCD did not receive any performance reviews for District operations. The District has not engaged in any documented collection of feedback from members of the public or other stakeholders regarding its programs and activities.

Recommendation: The District should consider implementing a system for collecting feedback from partners, agricultural producers that the District serves, and other conservation stakeholders. As the District develops and implements programming, the District should consider creating a process to systematically review feedback. The District should consider to use the findings from the review of feedback to refine the District’s future 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. Beginning with the November 2022 Supervisor elections, Chapter [2022-191](#), *Laws of Florida*, amended [s. 582.19\(1\)](#), *Florida Statutes*, required that candidates for election to a Supervisor seat had to live in the district and have agricultural experience, as defined by the Florida Legislature. Candidates in the November 2022 election were required by [s. 582.19\(1\)\(b\)](#), *Florida Statutes*, to sign an affirmation that they met the residency and qualification requirements.

Since the start of the January 2023 term, no Supervisors have been appointed. In response to the performance review, the District provided M&J with a written list of the qualifications that meet the agricultural experience requirements of [s. 582.19\(1\)](#), *Florida Statutes*, for the five current Supervisors.

M&J has not received requested qualification documentation from the Desoto County Supervisor of Elections, and so is unable to confirm if any of the appointed Supervisors signed an affirmation of qualifications. If the District failed to require appointed Supervisors to complete documentation that affirmed their compliance with the residency and qualification requirements of [s. 582.19\(1\)](#), *Florida Statutes*, the District may have unqualified and/or ineligible Supervisors occupying seats.

Two of the five Supervisor seats are up for election in November 2024.

Recommendation: The District should consider collaborating with the Desoto Supervisor of Elections to ensure that appointed Supervisors complete the affirmations 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.

Hardee Soil and Water Conservation District (“Hardee SWCD”) publishes meeting notices in The Herald-Advocate, a weekly newspaper. These notices list the meeting as a joint Board meeting between Hardee SWCD and Peace River SWCD. The Herald-Advocate describes itself as “Serving the Peace River Valley”, and surrounding area which encompasses Hardee and Desoto Counties.

M&J's review concluded that the District notices did 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 did meet this requirement for meetings held in 2021 and 2022. Since January 2023, ch. [50, Florida Statutes](#), has 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 did meet this requirement for meetings held in 2023 and 2024.

Retention of Records and Public Access to Documents

The District maintains record of meeting agendas and minutes from September 2020 through January 2024, and was able to provide the agendas and minutes to M&J upon request. The District was able to provide the other existing records and documentation requested by M&J for this performance review, and includes the appropriate link to the District's Annual Financial Reports on its website. M&J concludes that there are no notable issues with the District's records retention and public access to information as required [s. 119.021, Florida Statutes](#).

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 identify new sources of revenue to fund District outreach and conservation programming. The District could consider identifying grant opportunities from the U.S. Department of Agriculture, the Florida Department of Agriculture and Consumer Services, the National Association of Conservation Districts, or another public or private conservation-related entity. The District could also consider proposing an agreement with the Desoto County Board of County Commissioners to allow for the District to present an annual budget request, which would be subject to approval by the Board of County Commissioners.</p>	<ul style="list-style-type: none"> • Potential Benefit: Expand the District’s ability to provide services to the community. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.
<p>The District should consider developing and then adopting a strategic plan that builds on the District’s purpose and responsibilities defined in s. 582.02(4), Florida Statutes. The strategic plan should not simply describe the District’s current programs or contracts, 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 A strategic plan does not need to be extensive as long as the document provides the District with direction for addressing the community’s needs.</p>	<ul style="list-style-type: none"> • Potential Benefit: Actionable roadmap to address the community’s needs and a more effective method of planning and goal setting. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.

Recommendation Text	Associated Considerations
<p>The District should consider refining its existing set of goals and objectives to better align with the District’s statutory purpose, as defined in <u>s. 582.02(4), Florida Statutes</u>, 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: Help focus the District resources on objectives that align with the District’s purpose and better serve the community. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.
<p>The District should consider identifying performance measures and standards as part of the development of a strategic plan, such as number of interactions at outreach events. 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 toward the goals and objectives the District adopts, and support future improvements to the District’s service delivery methods.</p>	<ul style="list-style-type: none"> • Potential Benefit: More effective assessment of the District’s performance towards goals and objectives. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.
<p>The District should consider implementing a system for collecting feedback from partners, agricultural producers that the District serves, and other conservation stakeholders. As the District develops and implements programming, the District should consider creating a process to systematically review feedback. The District should consider to use the findings from the review of feedback to refine the District’s future service delivery methods.</p>	<ul style="list-style-type: none"> • Potential Benefit: An effective way to collect constituent feedback to better refine District operations to meet their needs. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.

Recommendation Text	Associated Considerations
<p>The District should consider collaborating with the Desoto Supervisor of Elections to ensure that appointed Supervisors complete the affirmations 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: Better transparency and avoidance of business potentially being voided. • Potential Adverse Consequences: M&J does not anticipate any adverse consequences as a result of implementation of the recommendation. • Costs: M&J does not anticipate any additional funding needed. • Statutory Considerations: M&J does not anticipate any legal, operational, or other issues that may arise from the proposed change.

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. Peace River SWCD did not provide M&J with a response letter for inclusion in the final report.