



HISTORIC TOWN OF EATONVILLE, FLORIDA

REGULAR COUNCIL WORKSHOP AGENDA

Tuesday, February 3, 2026, at 6:30 PM

Town Hall - 307 E Kennedy Blvd

Please note that the HTML versions of the agenda and agenda packet may not reflect changes or amendments made to the agenda.

- I. CALL TO ORDER**
- II. CITIZEN PARTICIPATION (Three minutes strictly enforced)**
- III. COUNCIL DISCUSSION**
 - 1. Discussion of the Winter Park/Ravaudage Wastewater Treatment and Force Main Construction Through Eatonville (**Public Works**)**
 - 2. Discussion of the Property Taxes Under Florida's Law Banning Local Government Expenditures (**Legislative/Legal**)**
- IV. COMMENTS**
 - 3. Staff Comments**
- V. ADJOURNMENT**

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****PUBLIC NOTICE****

This is a Public Meeting, and the public is invited to attend. This Agenda is subject to change. Please be advised that one (1) or more Members of any of the Town's Advisory Boards/Committees may attend this Meeting and may participate in discussions. Any person who desires to appeal any decision made at this meeting will need a verbatim record of the proceedings and for this purpose may need to ensure that a verbatim record of the proceedings is made which includes the testimony and evidence upon which the appeal is to be based – per Section 286.0105 Florida Statutes. Persons with disabilities needing assistance to participate in any of these proceedings should contact the Town of Eatonville at (407) 623-8910 "at least 48 hours prior to the meeting, a written request by a physically handicapped person to attend the meeting, directed to the chairperson or director of such board, commission, agency, or authority" - per Section 286.26



HISTORIC TOWN OF EATONVILLE, FLORIDA

TOWN COUNCIL WORKSHOP

FEBRUARY 3, 2026, AT 6:30 PM

Cover Sheet

****NOTE** Please do not change the formatting of this document (font style, size, paragraph spacing etc.)**

ITEM TITLE: Discussion of the Winter Park/Ravaudage Wastewater Treatment and Force Main Construction Through Eatonville (**Public Works**)

TOWN COUNCIL ACTION:

PROCLAMATIONS, AWARDS, AND PRESENTATIONS		Department: PUBLIC WORKS
INTRODUCTIONS		Exhibits:
CONSENT AGENDA		Letter from Orange County CDBG to Eatonville to provide input on Winter Park Wastewater Lift Station Project
COUNCIL DISCUSSION	YES	
ADMINISTRATIVE		

REQUEST: Discuss the Winter Park project and impact within Eatonville right of way.

SUMMARY:

Winter Park is receiving CDBG funding to construct a wastewater lift station for Ravaudage development and run a force main down Kennedy Blvd to get wastewater treatment capacity from Altamonte Springs. Orange County is seeking the Town's input.

RECOMMENDATION: Recommend for the Town Council to discuss the Winter Park project and impact within Eatonville right of way.

FISCAL & EFFICIENCY DATA: N/A



HOUSING AND COMMUNITY DEVELOPMENT DIVISION

MITCHELL L. GLASSER, Manager

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Section III. Item #1.

December 23, 2025

Veronica King, Town Clerk
Town of Eatonville
307 East Kennedy Boulevard
Eatonville, Florida 32751

Subject: Initiation of Consultation for Winter Park Wastewater Lift Station Project Using Community Development Block Grant-Disaster Recovery Program (CDBG-DR) Funding, Orange County Housing and Community Development Division, Orange County, Florida.

Dear Town Clerk King,

In accordance with the National Environmental Policy Act (NEPA; 42 U.S.C. § 4321 et seq.) and the National Historic Preservation Act (NHPA; 54 U.S.C. § 300101 et seq.), BDO USA, on behalf of Orange County, Florida, is seeking your input for the Winter Park Wastewater Lift Station Project planned in Eatonville and Winter Park, Orange County, Florida. The proposed project is funded with federal monies provided by the United States Department of Housing and Urban Development (HUD), Community Development Block Grant-Disaster Recovery Program (CDBG-DR). As part of its CDBG-DR allocation, Orange County has designated the City of Winter Park, Florida, as a grant subrecipient and the City of Winter Park plans to use the CDBG-DR funds to support a Wastewater Lift Station Project. In keeping with 24 CFR § 58, Orange County has assumed HUD's environmental review responsibilities for this project, including the preparation of an Environmental Assessment (EA) and its associated consultation. To expedite the review of this project, Orange County intends to implement the recommendations of 36 CFR § 800.8. to utilize the NEPA process to fulfill the review and consultation requirements of the NHPA.

Location and Description of the Proposed Undertaking

The proposed undertaking will take place between the Interstate 4 corridor, East Kennedy Boulevard, Grove Street, Monroe Avenue, and Bennett Avenue in Eatonville and Winter Park, Florida (see attached maps). The proposed components of the undertaking include:

- Upgrade of the existing Wymore Pump Station in Eatonville, Florida,
- Construction of the new Ravaudage Pump Station in Winter Park, Florida,
- Construction of 7,320 linear feet (1.39 miles) of twelve-inch force main between the two pump stations in Eatonville and Winter Park.

Location and Description of the Wymore Pump Station Upgrade

The upgrade of the Wymore Pump Station will occur at the existing facility located at Latitude 28°36'39.80"N, Longitude 81°23'5.43"W in the southeastern portion of Parcel 35-21-29-0000-00-062 in Eatonville, Florida (see attached maps). The planned upgrades include:

- Demolition of the existing pumps, generator, and electrical/control equipment,
- Modification of the existing piping,
- Installation of new pumps, an emergency generator with an aboveground fuel tank, electrical equipment, and updated instrumentation and controls, and
- Provisions for bypass wastewater pumping during construction.

All planned construction activities will occur in the previously disturbed soils.

Location and Description of the Ravaudage Pump Station Construction

The construction of the new Ravaudage Pump Station will occur at Latitude 28°36'41.62"N, Longitude 81°22'11.31"W in the northwestern portion of 1225 Bennett Avenue, Winter Park, Florida 32789, south of Monroe Avenue and west of Bennett Avenue (see attached maps). Construction of the pump station includes:

- Installation of a wet well, submersible pumps, an emergency generator with an aboveground fuel tank, electrical equipment, associated piping, and instrumentation and controls, and
- All necessary site work to support full functionality of the station.

Planned activities will require disturbance of intact Tavares fine sand-Urban land complex, 0 to 5 percent slopes, which are human-altered, eolian or sandy marine deposits, found on the flats and summits of marine terraces (NRCS 2025). The construction of the new pump station will extend to a maximum depth of thirty feet for placement of the wet well.

Location and Description of the Force Main Construction

The construction of the new force main will occur in the right-of-ways of East Kennedy Boulevard, Grove Street, and Monroe Avenue between the Ravaudage and Interstate 4 (see attached plans). The planned construction includes:

- Installation of 7,320 linear feet (1.39 miles) of twelve-inch force main using horizontal directional drilling (HDD). Work will occur in the right-of-ways of the roads, primarily beneath the pavement (see attached plans).
- Drilling will be conducted at an average depth of five feet below surface, but will extend deeper, as needed, to avoid existing utilities.
- Pilot holes will be drilled an average of every 400 feet (122 meters), but the length of the drill run may be shortened to avoid obstructions.
- Mechanical installation of a minimum of three After Repair Valves (ARV) along the new main.
- Mechanical excavation to insert and remove the drill bit.

The drilling will take place below the existing road disturbance. Soils within the construction area are Smyrna fine sand-Urban land complex, 0 to 2 percent slopes; Tavares fine sand-Urban land complex, 0 to 5 percent slopes; and Zolfo-Urban land complex; all of which are fine sands derived from eolian and marine deposits (NRCS 2025).

Area of Potential Effects (APE)

As defined in 36 CFR §800.16(d), the area of potential effects (APE) is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. Furthermore, 36 CFR §800.4(a)(1) requires consultation with the appropriate State Historic Preservation Officer (SHPO) to determine and document the APE. The APE for the undertaking is the same as the “affected environment” under NEPA.

Based on these requirements and the nature and scope of the undertaking, Orange County, Florida and the City of Winter Park recommend the following boundaries for the APE:

Wymore Pump Station

- **Direct APE:** The boundaries of the 0.18-acre project area, as defined by the proposed activities and shown on the attached maps. The direct APE will extend to a yet undetermined depth; however, as mentioned previously, it will occur in previously disturbed soils.
- **Indirect APE:** The viewshed of the proposed undertaking from the public right-of-way and adjacent parking lot, which are located east, south, and northwest of the property.

Ravaudage Pump Station

- **Direct APE:** The boundaries of the 0.26-acre project area, as defined by the proposed activities and shown on the attached maps. The direct APE will extend to thirty feet, as mentioned previously, and it will occur in Tavares fine sand-Urban land complex.
- **Indirect APE:** The viewshed of the proposed undertaking from the public right-of-way, which is located north of the property.

New Force Main

- **Direct APE:** The boundaries of the 7,500 by 30-foot project area, as defined by the proposed activities and shown on the attached maps. The direct APE will extend up to ten feet deep, primarily beneath the existing roadways.
- **Indirect APE:** The proposed undertaking is completely underground and will have no permanent visual effects, so a visual APE has not been defined.

Preliminary Identification and Assessment of Historic Properties

In keeping with the requirements of 36 CFR §800.4(a-d), historic preservation specialists, meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (36 CFR Part 61), reviewed relevant existing information on historic properties within and adjacent to the APE to identify and assess the effects of the undertaking. Reviewed documentation included Geographic Information Systems (GIS) data provided by the Florida Master Site File (FMSF; dated October 6, 2025), the National Register of Historic Places (NRHP), and historic aerial imagery available online. The results of these efforts are summarized below and in the attached table and maps.

Wymore Pump Station

The APE for the improvement of the Wymore Pump Station was surveyed for cultural resources by Janus Research in 2013 for a transportation project (FMSF Survey Number 20068). They did not identify any cultural resources within or near the APE (Janus Research 2013).

Ravaudage Pump Station

The APE for the Ravaudage Pump Station has not been surveyed for cultural resources. Aerial imagery shows that the area was a citrus grove from the earliest image date, 1952, until the mid-1980s (Historic Aerials 2025). The grove became overgrown and was eventually removed from the property between 2017 and 2019. The area was then graded, but it does not appear that any permanent structures were built on the land.

The building complex adjacent to the western boundary of the APE is currently a rehabilitation center. According to aerial imagery, the complex was constructed between 1980 and 1984 (Historic Aerials 2025). The building has not been evaluated for listing on the NRHP. However, based on its age, it currently would not qualify for listing under Criteria A through D.

New Force Main

The APE for the new force main has not been surveyed for cultural resources since it is mainly located beneath the existing roads. However, ten cultural resource investigations have been conducted adjacent to the undertaking resulting in documentation of twenty-two structures, one archaeological site, one architectural resource group, and one historic district within fifty meters of the APE (see attached table). Of these resources, only the Eatonville Historic District (80R9101; National Register Number 97001214) is listed on the NRHP. Six of the identified structures contribute to this district. The Meadows resource group (80R11963), the Hungerford School 1 archaeological site (80R5884), and nine structures have not been evaluated for individual listing. The remaining two structures near the APE are ineligible for listing as individual or contributing properties.

The Eatonville Historic District (80R9101/97001214) was listed on the NRHP on February 3, 1998, significant on the national level under Criterion A as the oldest African-American incorporated municipality in the United States and under Criterion B as the hometown and subject study of Zora Neale Hurston (Grant et al. 1997). The 23-acre district is roughly bounded to the west by the Interstate

4 corridor, to the north by Fords Avenue, to the east by South East Street, and to the south by Ruffel Street. East Kennedy Boulevard (formerly Apopka Road), running east-west, bisects the district. The force main APE crosses the district at two locations on East Kennedy Boulevard: a 303-foot section located around the intersection of South Calhoun Avenue and East Kennedy Boulevard and an 832-foot section that crosses the intersections of South West Street, People Street, and Taylor Avenue (see attached maps).

The district is composed of 51 contributing buildings, most of which are wood frame residential structures. However, commercial, religious, governmental, and social activity buildings also contribute to the district's eligibility. The period of significance is 1882 to 1946.

According to the district's nomination package, East Kennedy Boulevard/Apopka Road first appears on the 1846 Township Map of Government Lands prior to any significant settlement of the area (Grant et al. 1997). In the 1860s, the road was a narrow wagon trail that extended between Fort Maitland and Apopka. By the turn of the twentieth century, the trail had widened to a dirt road, which was eventually paved in 1928. Thirty-six years later, the road's name was changed to East Kennedy Boulevard. The road's position and orientation have essentially stayed the same since its initial construction.

As of the district's listing in 1998, only one original structure of the town, the old African Methodist Episcopalian Church (80R9084), was still standing on East Kennedy Boulevard (Grant et al. 1997). Due to these demolitions, the district nominators recommended several locations within the district for archaeological study, including the town's original cemetery, the shorelines of Lakes Bell and Sybelia, the original Eatonville Elementary School, the Hungerford School, and the family home of Zora Neale Hurston, which was located at the southeast corner of East Kennedy Boulevard and South West Street. Two of these potential sites are located adjacent to the undertaking APE: Zora Neale Hurston's family home and the Hungerford School. However, only the school has been archaeologically tested.

Archaeological investigations of the Hungerford School 1 archaeological site (80R5884) were completed by Pan-American Consultants Inc. (PCI) in 2003 (Lamb and Nolte 2003; FMSF Survey Number 09354) with subsequent pedestrian survey of the road right-of-ways adjacent to the site by Southeastern Archaeological Research (Matusik et al. 2024; FMSF Survey Number 29598). PCI excavated 35 shovel tests and performed metal detecting and pedestrian survey of the northeastern corner of the school's property, at the intersection of East Kennedy Boulevard and South College Avenue. Using these methods, PCI recovered 236 artifacts, dating from the early to mid-20th century, from the ground surface to a depth of 60 centimeters (24 inches). They also uncovered a portion of a partially-intact brick sidewalk near the surface at the road intersection. PCI recommended 80R5884 as potentially eligible for NRHP listing pending additional work.

Southeastern Archaeological Research's (SEARCH) did not find any materials associated with 80R5884 during their pedestrian survey of the road right-of-ways. SEARCH noted that the surveyed portions of the East Kennedy Boulevard and South College Avenue right-of-ways were severely

disturbed by infrastructure, utilities, and landscaping. SEARCH did not evaluate 80R5884 during their investigation. As a result, the site remains unassessed for NRHP listing.

Anticipated Impacts and Determination of Effects

Using the results of this review, Orange County, Florida recommends the following Determinations of Effects for the undertaking:

Direct Effects

Based on the available information, direct impacts from the proposed Winter Park Wastewater Lift Station Project will result from the construction of the pump stations and force main. In the case of the Wymore Pump Station, the construction to replace the existing equipment will occur completely in previously disturbed soils in an area that was already reviewed for cultural resources. No eligible or listed archaeological sites, historic properties, historic cemeteries, historic districts, historic landscapes, or traditional cultural properties are documented within or adjacent to the pump station APE. Given the previous disturbance and the lack of nearby resources, Orange County, Florida recommends a determination of **No Historic Properties Affected** for the direct effects of the upgrades to the Wymore Pump Station.

The APE for the new Ravaudage Pump Station has not been surveyed for cultural resources. However, a review of historical aerial imagery showed that the APE was previously a citrus grove that was removed and graded in the last six years. The mechanical disturbance of the ground surface likely destroyed the integrity of any potential archaeological materials associated with the historic citrus industry. No Native American archaeological sites are recorded in the immediate area of the project so the likelihood of encountering pre-Contact archaeological materials is also low. The early 1980s building complex, adjacent to the west side of the APE, has not been evaluated for NRHP listing. However, it currently does not meet the 50-year-old age requirement of Criteria A through D for listing, and the proposed construction of the pump station will have no direct effects to the property. Based on the previous disturbance and the lack of nearby resources, Orange County, Florida recommends a determination of **No Historic Properties Affected** for the direct effects of the construction for the Ravaudage Pump Station.

The APE for the new force main between the Wymore and Ravaudage Pump Stations runs through the NRHP-listed Eatonville Historic District and is adjacent to several of the district's contributing structures and potential archaeological sites, including the potentially eligible Hungerford School 1 archaeological site. The APE is also located beneath East Kennedy Boulevard, which was one of the earliest trails in the area and main roads through Eatonville. Although the APE extends through a culturally-rich part of the town, the placement of an underground force main, using subsurface drilling, should not affect the integrity of the above-ground district and its associated structures. Any archaeological remains associated with the Hungerford School, East Kennedy Boulevard, or Zora Neale Hurston's family home should be avoided by the depth of the drilling. However, Orange County recommends that drilling pilot holes, ARV placements, or other activities that require mechanical

excavation should not occur within the boundaries of the Hungerford School 1 archaeological site or at the reported location of Zora Neale Hurston's family home at the southeast corner of East Kennedy Boulevard and South West Street intersection. If these avoidance measures are followed then Orange County recommends a determination of **No Adverse Effects** for the placement of the new force main.

Finally, all ground disturbing activities will cease and Orange County will initiate Section III.B of the *Programmatic Agreement Among the Federal Emergency Management Agency, the Florida State Historic Preservation Office, the Florida Division of Emergency Management, the Alabama Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Mississippi Band of Choctaw Indians, and the Advisory Council on Historic Preservation* (PA) upon the inadvertent discovery of archaeological materials or human remains.

Indirect Effects

Based on the available information, long-term indirect effects are not anticipated from the upgrade of the Wymore Pump Station or the placement of the new force main. The Wymore Pump Station is an existing station, and the replacement of its equipment will not change any visible, audible, or other atmospheric aspects of the facility or its setting. Likewise, the new force main will be subsurface, aside from the ARV, and will not result in any long-term changes to the above-ground setting. Some short-term noise, traffic disruption, and atmospheric effects may occur during the construction of the pump station and force main, but these are temporary in nature and should be similar to other construction activities that occur in the area.

The construction of the new Ravaudage Pump Station will alter the look of the property, but no listed or eligible NRHP properties are recorded nearby to be affected by the change. Like the Wymore Pump Station and force main, there will be some short-term noise, atmospheric effects, and possible traffic disruption from the construction, but it should be temporary and similar in effect to other construction projects in the area.

Given these observations, Orange County recommends a determination of **No Historic Properties Affected** for the indirect effects of the proposed undertakings.

Cumulative Effects

Orange County recommends there will be no cumulative adverse effects from the proposed construction of the pump stations or force main. Neither pump station is located near or within a NRHP eligible or listed property that would be affected by the undertakings. The placement of a force main in existing right-of-ways will add to the ground disturbance from the existing roads and utilities. However, the right-of-ways currently do not contribute to the integrity of any NRHP eligible or listed properties. As a result, Orange County recommends a determination of **No Historic Properties Affected** from the cumulative effects of the undertakings.

We look forward to working with you on the development of the EA for the Winter Park Wastewater Lift Station Project. If you have any questions or concerns, please feel free to contact Krista Perry at Krista.Perry@bdo.gov.com or Inalbert Ramos at Inalbert.Ramos@ocfl.net.

Additionally, we look forward to receiving your response to our recommended determination of effects. Please send your reply by email to Inalbert Ramos and Krista Perry at the addresses above within 30 days of receipt of this letter.

Thank you for your time and consideration of this project.

Sincerely,



Mitchell Glasser

Orange County Housing and Community Development Manager

Attachments

Map Figures

FMSF Data Tables

References

Grant, Alice M., Tina Bucuvalas, and Carl Shiver

1997 Eatonville Historic District, National Register of Historic Places Registration Form. Prepared by the Florida Bureau of Historic Preservation. On file, Florida Division of Historical Resources.

Historic Aerials website

2025 Historic aerials of Eatonville and Winter Park, Florida, 1952-2023. Accessed December 18, 2025. Available online, <https://www.historicaerials.com/viewer>

Natural Resources Conservation Services

2025 Web Soil Survey. Accessed December 18, 2025. Available online, <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.

Cultural Resources Survey Report references are in the attached table.

Figure 1: Project Overview-Recorded Historic Properties, Resource Groups, and Historic Districts (Winter Park Wastewater Lift Station Project)

IBDC

Section III. Item #1.

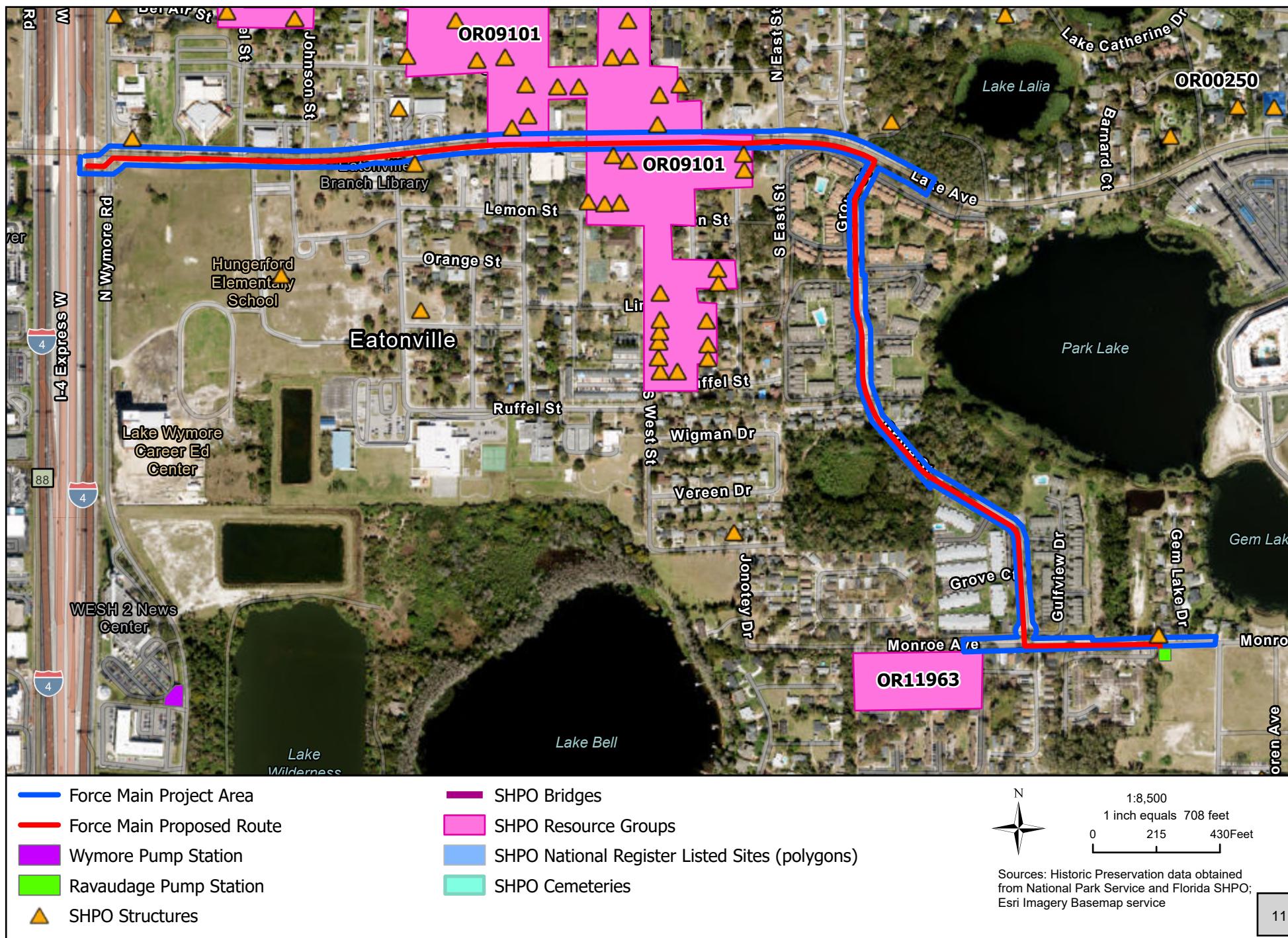
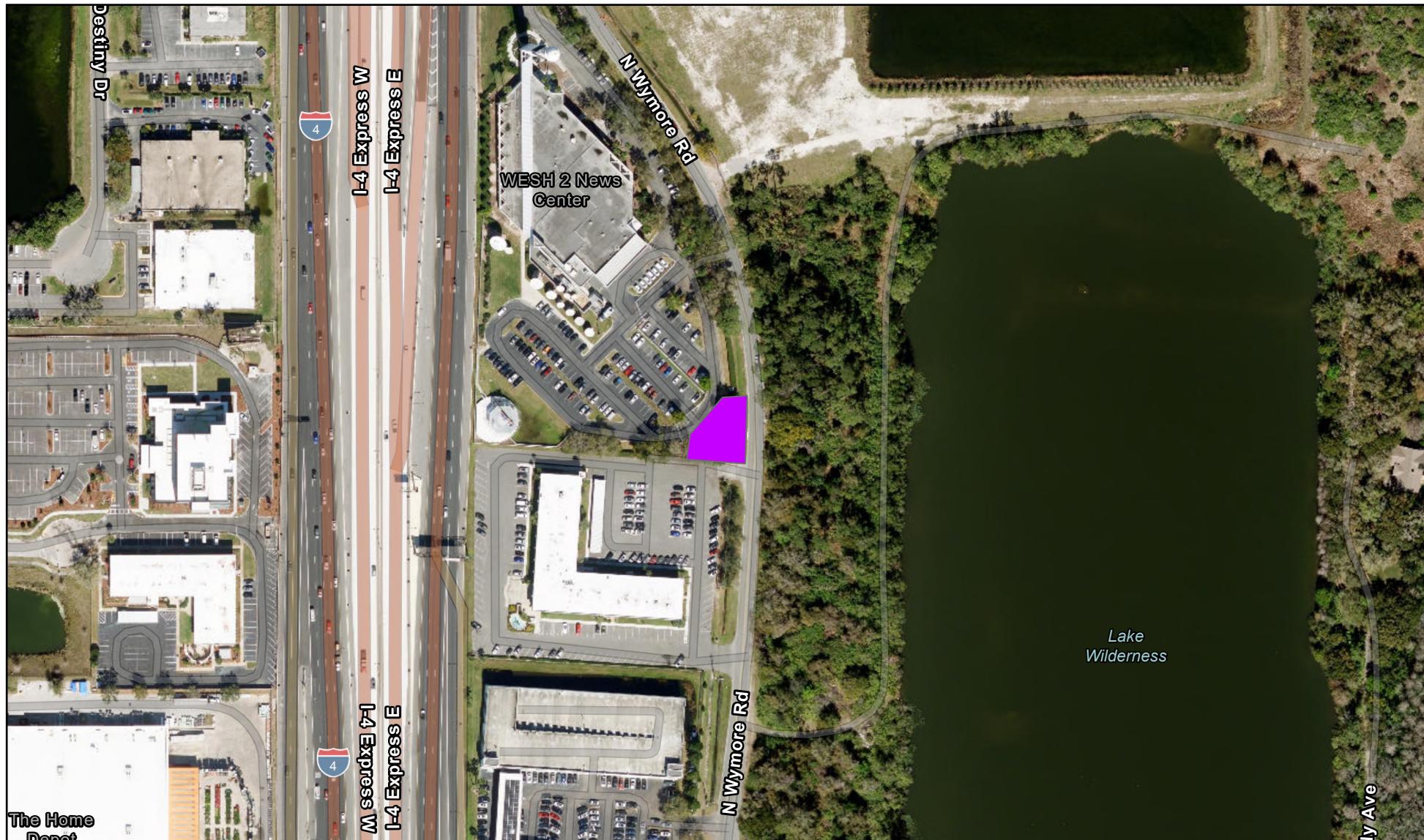
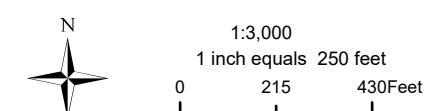


Figure 2: Wymore Pump Station- Recorded Historic Properties, Resource Groups, and Historic Districts (Winter Park Wastewater Lift Station Project)



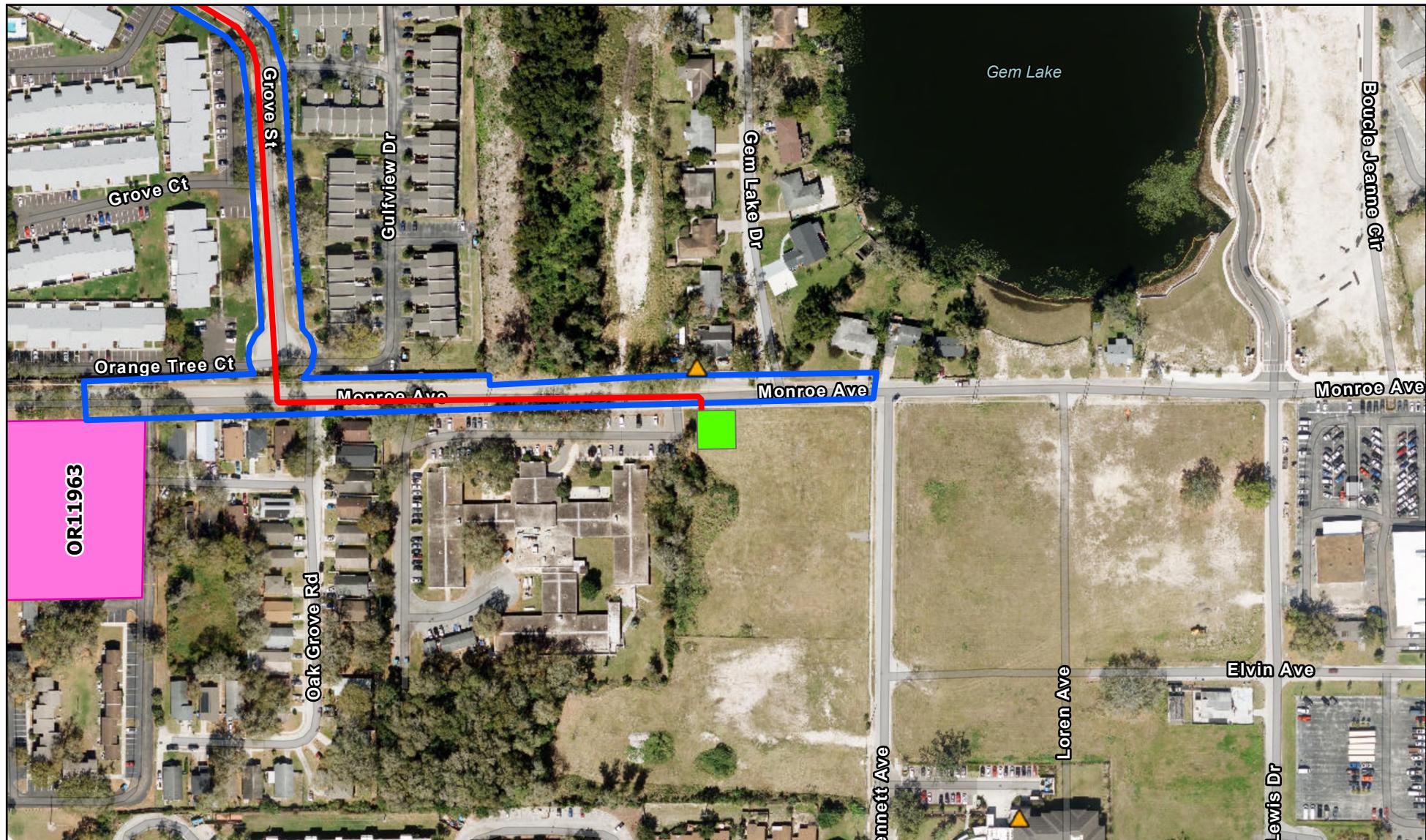
- Force Main Project Area
- Force Main Proposed Route
- Wymore Pump Station
- ▲ SHPO Structures

- SHPO Bridges
- SHPO Resource Groups
- SHPO National Register Listed Sites (polygons)
- SHPO Cemeteries



Sources: Historic Preservation data obtained from National Park Service and Florida SHPO; Esri Imagery Basemap service

Figure 3: Ravaudage Pump Station- Recorded Historic Properties, Resource Groups, and Historic Districts (Winter Park Wastewater Lift Station Project)



- Force Main Project Area
- Force Main Proposed Route
- Ravaudage Pump Station
- ▲ SHPO Structures

- SHPO Bridges
- SHPO Resource Groups
- SHPO National Register Listed Sites (polygons)
- SHPO Cemeteries

N
1:3,000
1 inch equals 250 feet
0 215 430 Feet

Sources: Historic Preservation data obtained from National Park Service and Florida SHPO; Esri Imagery Basemap service

Figure 4: Project Overview-Recorded Cultural Resources Surveys and Archaeological Sites- Confidential (Winter Park Wastewater Lift Station Project)

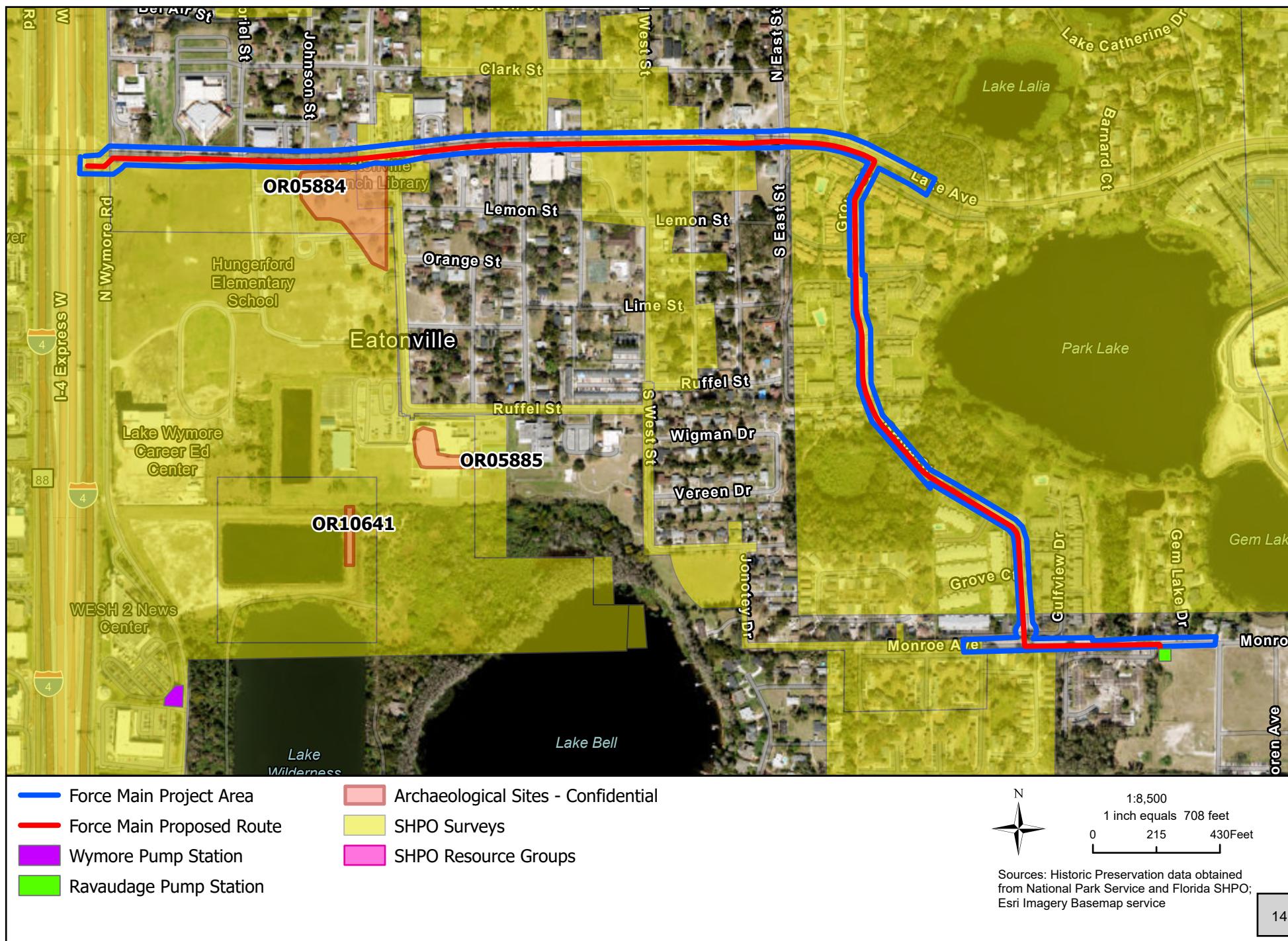


Figure 5: Wymore Pump Station- Recorded Cultural Resources Surveys and Archaeological Sites- Confidential (Winter Park Wastewater Lift Station Project)

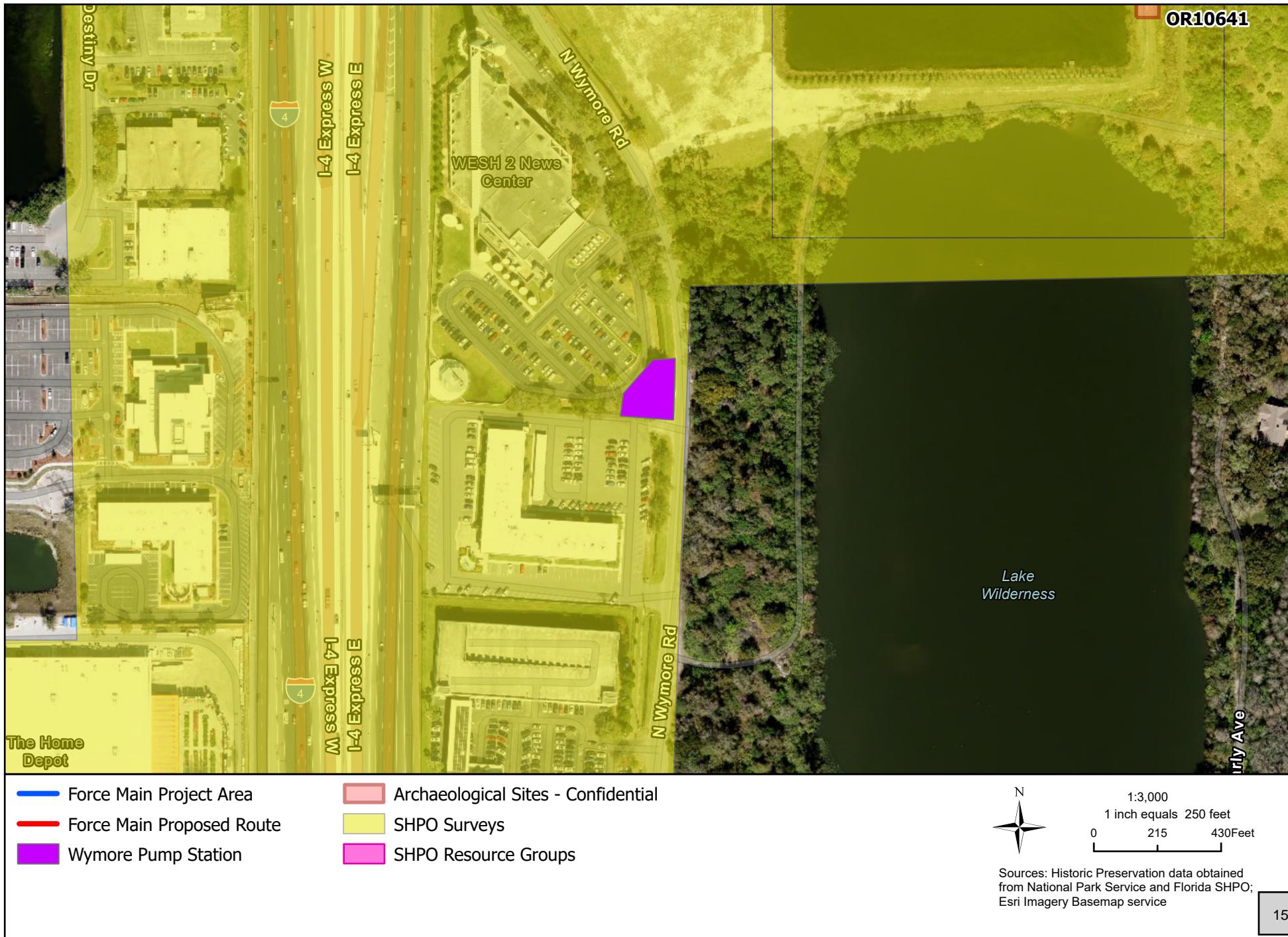


Figure 6: Ravaudage Pump Station- Recorded Cultural Resources Surveys and Archaeological Sites- Confidential (Winter Park Wastewater Lift Station Project)

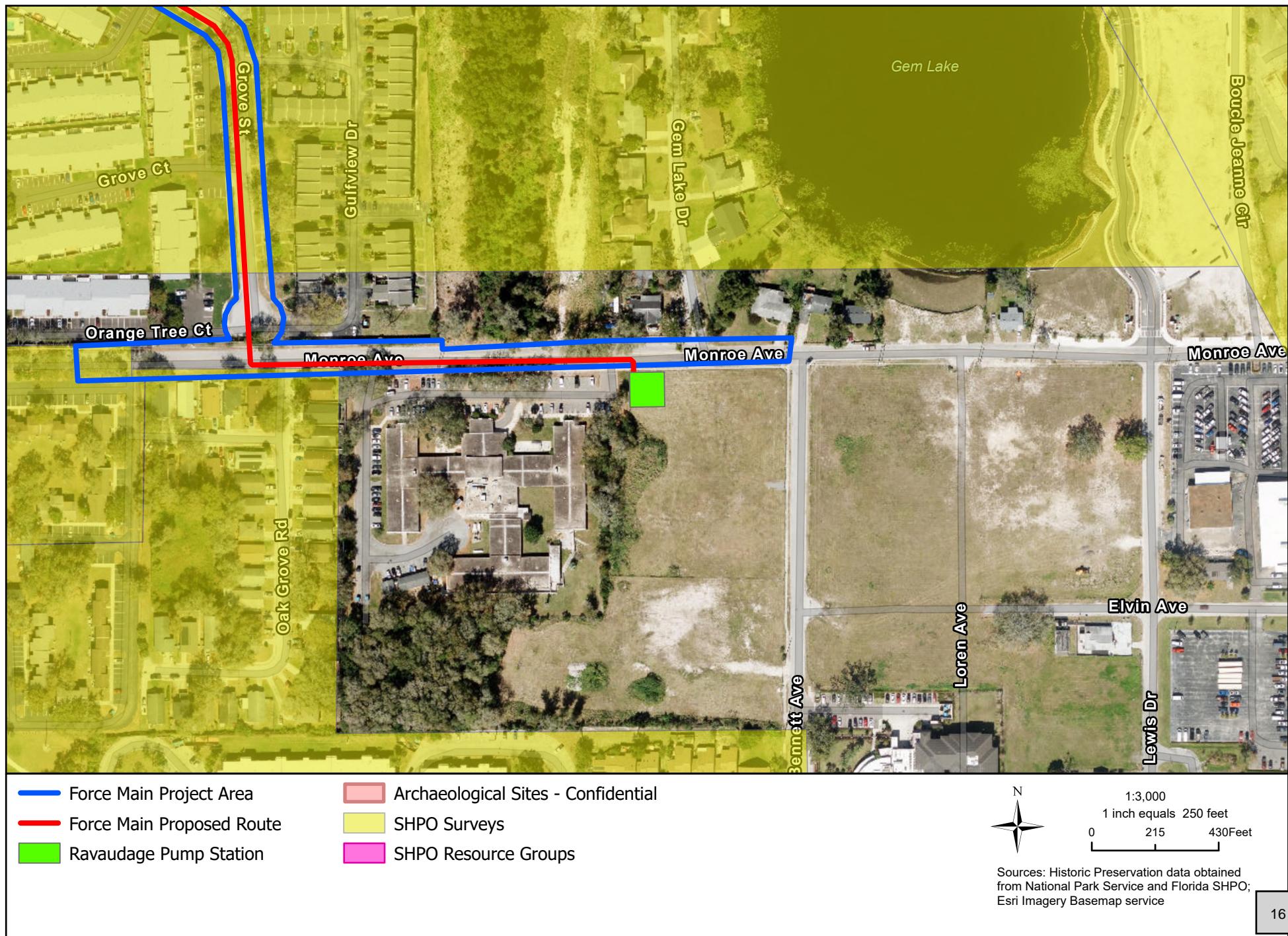


Table 1: FMSF Data for Structures, Archaeological Sites, Resource Groups/Districts, and Surveys (version October 16, 2025).

FMSF Structures							
Site ID	Site Name	Address	Year Built	Style	Survey Eval	Survey Dist	SHPO Eval
OR02253	113 MONROE AVENUE	113 MONROE AVENUE	c 1925	Bungalow ca. 1905-1930	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR02275	CYRUS THURSTON	1 PARK LANE	c 1885	Queen Anne (Revival) ca. 1880-1910	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09052	SPENCER RESIDENCE	355 KENNEDY BLVD	c 1946	Frame Vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09053	24 CALHOUN AVENUE	24 CALHOUN AVE	c 1928	Frame Vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09069	501 KENNEDY BOULEVARD	501 KENNEDY BLVD	c 1946	Masonry vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09084	OLD AME CHURCH/ L. WHITE RESIDENCE	550 KENNEDY BLVD	c 1882	Frame Vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09086	ROBERT MOSELY HOUSE	11 TAYLOR AVE	c 1888	Frame Vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09087	418 KENNEDY BOULEVARD	418 KENNEDY BLVD	c 1946	Masonry vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR09833	Waynes World	426 E Kennedy BLVD	1946	Unspecified by Surveyor	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR10214	15 E Kennedy Boulevard	15 E Kennedy BLVD	c 1955	Masonry vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
OR11961	308 E. Kennedy Boulevard	308 E Kennedy BLVD	c 1958	Masonry vernacular	Not Evaluated by Recorder	Not Evaluated by Recorder	Not Evaluated by Recorder
FMSF Resource Groups							
Site ID	Site Name	Type	Year Signif	Contributing	Non Contributing	Survey Eval	SHPO Eval
OR09101	Eatonville Historic District	Historic District	1882-1946	51	26	Eligible	Listed
OR11963	The Meadows	Building Complex				Not Evaluated	Not Evaluated

FMSF Archaeological Sites						
Site ID	Site Name	Type	Culture	Survey Eval	SHPO Eval	
OR05884	Hungerford School 1	Building remains, historic artifact scatter, historic road remains	American, 1821-present	Potentially Eligible	Not Evaluated	
FMSF Surveys						
Survey No.	Report Date	Title	Authors	Type	New Sites	Old Sites
2249	1990	Historic properties survey of the city of Maitland.	Johnston, Sidney & Stephen Olausen	Archaeology	69	
5707	1999	Cultural Resource Assessment Survey Interstate 4 Section 2 Project Development and Environment Study from Bee Line Expressway (S.R. 528) to S.R. 472 Interchange Orange, Seminole, and Volusia Counties, Florida	Marion Almy	Archaeology & Structural	492	434
5985	2000	Town of Eatonville - Design Guidelines	Panamerican Consultants	Structural	49	
6783	2000	Section 106 Effects Determination for the I-4 Interim Improvements From S.R. 423 (John Young Parkway) to S.R. 436 (Semoran Boulevard) Orange and Seminole Counties, Florida	Janus Research	Archaeology & Structural		
9354	2003	An Archaeological and Historical Survey of the Hungerford School Project Area in Orange County, Florida	Lamb, Lisa N. & Kelly Nolte	Archaeology & Structural	3	0
9845	2001	Architectural Survey and National Register Evaluation, The City of Winter Park, Orange County, Florida	Henry, Geoffrey B	Archaeology	245	405
20068	2013	I-4 CRAS Re-evaluation from West of Kirkiman Road (SR 435) to North of Sanlando Springs Road (SR 434)	Janus Research	Archaeology & Structural	180	51
27865	2021	Archaeological Trip Report for USDA-NRCS Environmental Quality Incentive Program; Orange County, Florida; Land of Hope	Stephen Andrew Wise	Archaeology	0	0
29598	2024	Cultural Resource Assessment Survey for the Hungerford Elementary School Safe Routes to School Project, Orange County, Florida	Angela Matusik, Ariel Olivera, & Erin Martin	Archaeology & Structural	4	2



HISTORIC TOWN OF EATONVILLE, FLORIDA

TOWN COUNCIL WORKSHOP

FEBRUARY 3, 2026, AT 6:30 PM

Cover Sheet

****NOTE** Please do not change the formatting of this document (font style, size, paragraph spacing etc.)**

ITEM TITLE: Discussion of the Property Taxes Under Florida's Law Banning Local Government Expenditures (**Legislative/Legal**)

TOWN COUNCIL ACTION:

PROCLAMATIONS, AWARDS, AND PRESENTATIONS		Department: LEGISLATIVE/LEGAL
INTRODUCTIONS		Exhibits:
CONSENT AGENDA		<ul style="list-style-type: none"> Frequently Asked Questions
COUNCIL DISCUSSION	YES	
ADMINISTRATIVE		

REQUEST: Discuss the Property Taxes Under Florida's Law Banning Local Government Expenditures.

SUMMARY:

Changes to Florida's property tax system may reach the ballot in November 2026. The Town of Eatonville should be considering ways to educate residents about how property tax revenues are generated, how they are used, and the fiscal impacts forecast to result if those revenues are lost.

The town must be mindful of election laws, which limit the use of public funds by the town and other local governments to communicate about ballot issues subject to the decision of voters. This discussion item will begin the needed conversations and provide material that addresses the relevant law and several related questions to help the town legislatives, administrative staff, and residents understand how it applies to the Town of Eatonville.

RECOMMENDATION: Recommend for the Town Council to discuss the Property Taxes Under Florida's Law Banning Local Government Expenditures.

FISCAL & EFFICIENCY DATA: N/A



Frequently Asked Questions:

Communicating About Property Taxes Under Florida's Law Banning Local Government Expenditures on Ballot Questions

The following material is for informational purposes and not intended as legal advice. Seek the advice of your City Attorney or election law counsel before making any related decisions.

Changes to Florida's property tax system may reach the ballot in November 2026. City governments should be considering ways to educate residents about how property tax revenues are generated, how they are used, and the fiscal impacts forecast to result if those revenues are lost. However, cities must be mindful of election laws, which limit the use of public funds by cities and other local governments to communicate about ballot issues subject to the decision of voters. This material addresses the relevant law and several related questions to help cities understand how it applies to them.

A. What law is at play?

Section 106.113, Florida Statutes, prohibits the expenditure of public funds by local governments on (1) political advertisements or (2) communications sent to voters concerning a "Ballot Question" subject to a vote of Florida electors (voters).

► **Under the law, when would a "ballot question" concerning property taxes arise?**

When a concept or proposal remains under consideration by legislators, it is not yet a Ballot Question "subject to a vote." But, when a concept or proposal is passed as a joint resolution in bill form by three-fifths of Florida's House and Senate, transmitted to Florida's Department of State, and assigned a designating number for placement on an upcoming ballot, the proposal has achieved "Ballot Placement" and thus becomes a "Ballot Question" subject to a vote.¹

¹It may help to approach §106.113 and citizen education/messaging in two phases: BEFORE BALLOT PLACEMENT, city communications are more likely to be treated as pure citizen education. AFTER BALLOT PLACEMENT, city communications face the threat of being treated as attempts at prohibited political advocacy. Thus, once a legislative proposal attains Ballot Placement, all elements required to trigger §106.113 are present and create heightened risk of violating the ban on expenditures used to send content to voters.

B. What's prohibited?

1. **A paid political advertisement related to** a political issue and published/broadcast in any communications medium, even before it becomes a Ballot Question, is always prohibited if paid for using public funds.
2. **Communication sent to voters** and related to a proposal after it has become a Ballot Question is prohibited if paid for using public funds.

C. The period *BEFORE* a property tax proposal matures into a ballot question

1. Can our city use public funds to educate residents about property tax revenues and their importance to municipal services?

Yes. Cities may expend funds to help educate residents with property tax facts. City officials and staff may use city resources necessary to perform research and analysis needed to understand potential tax revenue changes and impacts. Cities can explain the municipal services made possible through the city's share of property tax revenues, how property tax revenues are derived, budgeted, and used, and which services and programs are forecast to be reduced or lost if tax revenues were eliminated. In all of this, the city may use city funds to send its research, findings, or other relevant information to residents, if done before a proposal becomes a Ballot Question. However, once a proposal becomes an actual Ballot Question, even factual information may not be sent to voters using public funds. At that stage, other communication methods must be used that don't involve sending communications to voters, such as the city's website or social media platform posts.

2. What types of activities or events may cities use to educate residents before a proposal becomes a ballot question?

- ▶ Produce brochures, flyers, and printed materials explaining property tax facts, which may be sent to residents.² Cities may distribute content via email.

²**Before Ballot Placement occurs**, cities can send these types of messages or materials to voters at the city's expense as educational materials. **After Ballot Placement**, these same materials could be construed as communication of political advocacy in violation of **§106.113 if sent to voters at the city's expense**. If published materials are created to be sent to residents, these should include a dissemination date (month/year) to help demonstrate that it was sent to the public before a proposal became a ballot question.

However, as discussed below, paying for and using email distribution lists to transmit this type of material may violate §106.113 **if sent** to voters **after** a proposal matures into a Ballot Question.

- ▶ Host and participate in public meetings, town halls, forums, or media events to answer questions.
- ▶ Post verifiable factual information on official city websites and social media.³
- ▶ Respond to public inquiries with factual information.
- ▶ Report on official city actions related to property tax issues in an accurate, fair, and impartial manner.

3. Can city staff and elected officials express opinions that advocate for or against potential property tax proposals before they become ballot questions?

Yes. Elected officials may express their opinions at any time through speeches or written materials published in newspapers or other media, provided no public funds are used to send those opinions directly to residents or to transform those opinions into paid political advertisements. City staff may participate in advocacy on their own time (during non-working hours) and with their own resources but **should avoid using city resources for advocacy during work hours.**

4. What are the general limits on what can be communicated before a proposal becomes a Ballot Question?

All material communicated on the subject of property tax changes should focus on facts and avoid language that amounts to "political advertisement" (i.e., messages urging residents to "vote for" or "vote against" proposals to change property taxes). Communications should focus on verifiable data and avoid subjective or qualitative statements. For example, stating "Property taxes fund police, fire, and parks" is factual; saying "Property tax cuts will harm public safety" is a qualitative claim and should be avoided. By limiting messaging and education to verifiable, factual information, cities limit the chance their communications may be characterized as unlawful "political advertisement" developed using public funds. As an added precaution, if published materials are created to be sent to residents, they should include the dissemination date (month/year) to help demonstrate that it was sent to the public before a proposal became a Ballot Question.

³Cities should take particular care around the use of social media platforms and understand if such content is posted at a cost designed to boost its reach to any of the voting public. An argument can be made that paying to boost a social media post constitutes "sending" the communication to voters' feeds at public expense. It would also constitute a "paid expression" for political advertisement purposes.

5. Can the city adopt a resolution opposing amendments to property tax laws before any such proposal attains Ballot Placement?

Maybe, but it carries uncertain legal risk. The better course is to use any official act by a council or commission to communicate factual and verifiable information about the role property tax revenues play in city government and communicate demonstrable impacts the city determines would flow from the loss of such revenues. Under the current version of §106.113, there are no reported opinions clearly approving the adoption of resolutions opposing proposed property tax amendments. Section 106.113(2) states, *"This subsection does not preclude a local government or a person acting on behalf of a local government from reporting on official actions of the local government's governing body in an accurate, fair, and impartial manner . . ."* Given that adoption of a resolution is an "official act" of municipal governments, some may see this as authorizing adoption of resolutions on the subject of property taxes, which may then be reported to the public. Others may look further and see the requirement to report on official actions in a fair and impartial manner as a warning against any official actions seen as political advocacy, taking sides for or against a property tax proposal.

If a city, nonetheless, feels compelled to adopt a resolution, it should include language in the resolution's preamble that its action is intended to comply with §106.113 and is based on a good faith interpretation of the statute's wording, which allows local governments to take official actions without violating the law. Arguably, the official act of passing a resolution does not require a direct expenditure of public funds, but even this argument cannot remove the risk of a filed complaint alleging a resolution violates §106.113.

6. Can a city use public funds for messages opposing property tax proposals in any medium before a proposal becomes a ballot question?

No. This type of message very likely will be considered "political advertisement." Using public funds to pay for political advertisement explicitly "opposing" an issue is always prohibited, even before a proposal becomes a Ballot Question. Florida's election code defines "political advertisement" in a specific manner. As defined later in this document, political advertisement always consists of express advocacy "for or against" a proposed "issue," regardless of whether the issue has matured into a Ballot Question. This means the trigger contained in §106.113 may occur as soon as a paid communication containing express advocacy "for or against" the issue is published. Therefore, cities should not use public funds to procure paid political advertisements. Instead, cities may safely use resources to educate residents with factual and verifiable information about the role property tax revenues play in city government and communicate demonstrable impacts

the city determines would flow from the loss of such revenues. Paid messaging that is limited to factual and verifiable content, without language the law regards as political advertisement/express advocacy, should be permissible to the same extent as other communications discussed elsewhere in this document. However, any messaging produced with public funds and published in any public media format should be reviewed in consultation with legal counsel to ensure it remains fact-based and neutrally educational, and not a political advertisement.

D. The period *AFTER* a property tax proposal matures into a ballot question

1. At what point are §106.113's restrictions on public expenditures related to ballot proposals most likely triggered to take effect?

The spending prohibitions are most clearly triggered **when any legislative proposal is enacted by the House and Senate, sent to the Department of State, and assigned a ballot number by the Department of State**. At this stage, a ballot proposal is understood to become a Ballot Question that is "subject to a vote of the electors."

The spending prohibitions are always triggered against **political advertisements** paid for using public funds.

2. What is prohibited after a proposal becomes a Ballot Question?

- ▶ Using public funds to send any communication to voters about the Ballot Question, **even if factual**.
- ▶ Using public funds to pay for political advertisements advocating for or against the Ballot Question, even if the communication is not sent directly to voters (e.g., posted on a website).

3. What communications activities may cities use after a proposal becomes a ballot question?

- ▶ Post verifiable factual information on official city websites and social media⁴ (*but may not send directly to voters through any use of public funds*).
- ▶ Host and participate in public meetings, town halls, forums, or media events to answer questions.
- ▶ Respond to public inquiries with factual information.
- ▶ Report on official city actions related to property tax issues in an accurate, fair, and impartial manner.
- ▶ Produce brochures, flyers, and printed materials explaining property tax facts and making these available for the public to receive or takeaway when visiting city hall, public forums, or other places, provided these are *not sent to voters at any public expense, and provided none of these amounts to political advertisements paid for with public funds*.⁵

4. Can elected officials still express opinions that advocate for or against a property tax proposal after the proposal becomes a ballot question?

Yes. Elected officials may express opinions on a ballot proposal or Ballot Question at any time, provided no public funds are used to send those opinions directly to voters or to convert them into a paid political advertisement.

5. What counts as a "political advertisement" or "communication sent to electors"?

A **"political advertisement"** is defined as "a paid expression in a communications medium . . . [i.e., broadcasting stations, newspapers, magazines, outdoor advertising facilities, printers, direct mail, advertising agencies, the internet, and telephone companies] whether radio, television, newspaper, magazine, periodical, campaign literature, direct mail, or display or by means other than the spoken word in direct conversation, **which expressly advocates** the election or defeat of a candidate or **the approval or rejection of an issue.**" §106.011(15), Florida Statutes.

⁴ Cities should take particular care around the use of social media platforms and understand if such content is posted at a cost designed to boost its reach to any of the voting public. An argument can be made that paying to boost a social media post constitutes "sending" the communication to voters' feeds at public expense. It would also constitute a "paid expression" for political advertisement purposes.

⁵ Cities may still distribute content to voters via email, provided there are no direct costs associated with sending the email such as a payment for the email distribution list using public funds. While Division of Elections Opinion 10-06 implies that the use of a city employees' time during normal business hours to send an email would not constitute a direct cost, this issue has not been decided after the adoption of Section 106.113 and may trigger a complaint.

A "**communications sent to electors**" includes any materials **delivered directly to voters** (by mail, email, etc.), regardless of content.

Though the issue has not yet been addressed in any written opinion, it is unlikely that posting purely factual information to the city's website or an unboosted social media platform would constitute a communication "sent" to voters. And §106.113 expressly states it "does not preclude a local government or a person acting on behalf of a local government from . . . posting factual information on a government website or in printed materials." **For this reason, even after a proposal attains Ballot Placement and becomes a Ballot Question**, the use of city websites and social media to generate factual educational content should be permissible.

6. How are violations of §106.113 enforced, and what are the penalties?

The **Florida Elections Commission** adjudicates alleged complaints of violations. **Violations may result in fines up to \$2,500 per count**, with higher penalties for repeated offenses. Penalties may be mitigated if the city demonstrates good faith efforts to comply with §106.113. Any person can file an administrative complaint with the Florida Elections Commission alleging a city's activities violate §106.113, provided the complaint is sworn and based on personal knowledge.

E. Points to remember with respect to §106.113 and a property tax proposal that becomes a ballot question:

Before: Cities have the most flexibility before a proposal becomes a Ballot Question and may use public funds to share factual education and messaging, whether published to a city website or sent to voters. Avoid creating political advertisements by eliminating language to "vote for" or "vote against" a proposal. Personal opinions, including opinions to "vote for" or "vote against" a proposal are permitted, provided none are generated or communicated through the use of public funds.

After: Cities have less flexibility as restrictions against public expenditures crystallize. Cities may not use public funds to send material to voters concerning a Ballot Question and may not pay for political advertisements. Public officials may voice their opinions in person, in response to questions at meetings or special forums, and through published media outlets such as opinion columns, provided these are not generated or communicated through the use of public funds.

Always: Regardless of whether a Ballot Question is formally pending, cities may report on official actions of city government; post factual information on government websites, unboosted social media platforms, or in printed materials (not sent to voters); host public forums; and respond to inquiries with factual information. Expressing personal opinions, including "vote for" or "vote against" proposals is permitted, provided it is not generated or communicated using public funds.

Never: Cities may not use public funds to create or run political advertisements expressing opposition or support for tax amendment proposals.