

BEFORE THE COUNTY COMMISSION OF
POLK COUNTY, FLORIDA

IN RE: PETITION TO ESTABLISH)
THE GARDNER TRAILS COMMUNITY)
DEVELOPMENT DISTRICT)

AFFIDAVIT ADOPTING WRITTEN, PRE-FILED TESTIMONY OF
BROC ALTHAFER AS TO ESTABLISHMENT OF
THE GARDNER TRAILS COMMUNITY DEVELOPMENT DISTRICT

STATE OF
FLORIDA COUNTY
OF OSCEOLA

I, Broc Althafer, P.E., being first duly sworn or affirmed, do hereby state for my affidavit as follows:

1. I have personal knowledge of the matters set forth in this affidavit.
2. My name is Broc Althafer, P.E., and I am employed by Osceola Engineering, LLC as a civil engineer.
3. The prepared, written pre-filed testimony consisting of eight (8) pages, which is attached hereto and submitted under my name to the Board of County Commissioners of Polk County, Florida relating to the *Petition to Establish The Gardner Trails Community Development District* submitted on December 4, 2025 (the “Petition”), is true and correct.
4. If I were asked the questions contained in the pre-filed testimony orally at The Gardner Trails Community Development District establishment hearing, my oral answers would be the same as the written answers presented in my pre-filed testimony.
5. My credentials, experience, and qualifications concerning land development and the construction of public infrastructure as a professional engineer and related matters are accurately set forth in my pre-filed testimony.

6. My pre-filed testimony generally addresses the nature of the proposed development plan of public infrastructure for The Gardner Trails Community Development District.

7. No corrections or amendments to my pre-filed testimony or the Petition and its exhibits are required.

Under penalties of perjury, I declare that I have read the foregoing and the facts alleged are true and correct to the best of my knowledge and belief.

Executed this 6th day of January 2026.



Broc Althafer, P.E.

STATE OF FLORIDA
COUNTY OF OSCEOLA

The foregoing instrument was affirmed and subscribed before me by means of physical presence or online notarization, this 6th of January 2026, by Broc Althafer, P.E., who is personally known to me or who has produced _____ as identification and who did or did not take an oath.



CARIE R. THOMPSON
Notary Public
State of Florida
Comm# HH645581
Expires 3/26/2029



(Official Notary Signature & Seal)

Name: CARIE THOMPSON

Personally Known

OR Produced Identification _____

Type of Identification _____

TESTIMONY OF BROCK ALTHAFER, P.E., FOR ESTABLISHMENT OF THE GARDNER TRAILS COMMUNITY DEVELOPMENT DISTRICT

1. Please state your name and business address.

My name is Broc Althafer, and my business address is 1003 Florida Avenue, St. Cloud, FL 34769.

2. By whom are you employed and in what capacity?

I am employed by Osceola Engineering, LLC as Manager.

3. How long have you been in the engineering field?

I have been in the engineering field for over 19 years.

4. Does your firm, Osceola Engineering, LLC represent Prince Poinciana, LLC?

Yes. My firm serves as Consulting Engineer.

5. Please give your educational background, with degrees earned, major areas of study and institutions attended.

I received my Bachelor of Engineering, in Civil Engineering from the University of Florida in 2006.

6. Do you have any professional licenses, registrations, or certifications?

I hold a license as a Professional Engineer in the State of Florida. My license number is 72321.

7. Please summarize your previous experience as it relates to public facility design and construction, and land development and planning.

I have been involved with numerous developments in southwest Florida region similar to the District. My specific focus is in land development, utilities design, and storm water-related engineering.

8. Are you familiar with the Petition (“Petition”) filed by Prince Poinciana, LLC (“Petitioner”) on December 4, 2025 seeking establishment of The Gardner Trails Community Development District (“District” or “Proposed District”)?

Yes. I have reviewed the Petition and the exhibits submitted with the Petition.

9. Have you been involved in any developments of the type and nature similar to those in the proposed The Gardner Trails Community Development District?

1 Yes. I have been involved in several developments that contain the same or similar
2 necessary public infrastructure facilities utilizing my expertise in the design, permitting,
3 and construction of similar systems.

4

5 **10. Are you familiar with those parcels of land proposed to be included in the District?**

6

7 Yes, I am.

8

9 **11. Are you generally familiar with the geographical area, type, and scope of development**
10 **and the available services and facilities in the vicinity of the Proposed District?**

11

12 Yes, I am.

13

14 **12. What has been your role with respect to the Proposed District's establishment**
15 **proceeding?**

16

17 I serve as Consulting Engineer to the Petitioner.

18

19 **13. Have you reviewed the Petition and approved its contents?**

20

21 Yes, I have reviewed and approved the engineering exhibits included in the Petition, along
22 with the estimated costs of construction, and the future ownership and maintenance exhibit
23 to the Petition.

24

25 **14. Did you review specifically any of the exhibits attached to the Petition?**

26

27 Yes, I have reviewed and approved Exhibits 1, 2, 4, 5, and 6.

28

29 **15. Do any of those exhibits require any change or correction?**

30

31 Yes. Exhibit 6 was revised to clarify the ownership entity of the collector roadway, onsite
32 local roadways, water distribution system, and sanitary collection and conveyance system.

33

34 **16. To the best of your knowledge, are Exhibits 1, 2, 4, 5, and 6 to the Petition true and**
35 **correct?**

36

37 Yes, to the best of my knowledge.

38

39 **17. In general, what do Exhibits 1, 2, 4, 5, and 6 to the Petition demonstrate?**

40

41 Exhibit 1 depicts the general location and boundary of the Proposed District. Exhibit 2 is a
42 metes and bounds legal description of the Proposed District's boundaries. Exhibit 4 depicts
43 the existing and future land uses for the lands comprising the Proposed District. Exhibit 5
44 indicates the location of major outfall canals and drainage basins for the lands within the
45 Proposed District as well as the location of existing major trunk water mains, reuse water
46 mains, proposed storm drainage pipes, and wastewater interceptors within the lands
47 proposed to be included within the Proposed District. Exhibit 6 describes the types of

1 improvements to be constructed, future ownership, operation and maintenance entities, and
2 the estimated costs of construction.

3

4 **18. Would you generally describe the services and facilities that the Proposed District is**
5 **expected to provide?**

6

7 The Petitioner presently intends for the Proposed District to participate in the acquisition
8 or construction of stormwater management system, onsite roadway improvements, water
9 distribution system, sanitary collection and conveyance system, landscape and hardscape
10 and recreation, and other public improvements.

11

12 **19. Are the construction cost estimates for the Proposed District facilities reasonable?**

13

14 Yes, I have reviewed the construction cost estimates and, to the best of my knowledge,
15 information, and belief, and based on the information available, the construction cost
16 estimates for the Proposed District improvements are reasonable based on my experience
17 and knowledge of construction costs in the area.

18

19 **20. Based upon your training and experience as a professional engineer, do you have an**
20 **opinion as to whether the Proposed District is of sufficient size, sufficient**
21 **compactness, and sufficient contiguity to be developed as a functional interrelated**
22 **community?**

23

24 Yes, I do have an opinion.

25

26 **21. What is your opinion?**

27

28 My opinion is that the Proposed District can be developed as a functional interrelated
29 community because it has sufficient size, sufficient compactness and sufficient contiguity.

30

31 **22. What is the basis for your opinion?**

32

33 For many reasons, the Proposed District facilities can be provided in an efficient, functional
34 and integrated manner. First, the lands to be included within the Proposed District have
35 sufficient infrastructure needs to be developable as a functionally interrelated community.
36 Second, this necessary infrastructure can be provided by the Proposed District in a cost-
37 effective manner based upon the specific design of the community. Furthermore, the use
38 of one development plan whose infrastructure is implemented by a community
39 development district (“CDD”) to provide the community services and facilities will ensure
40 that the proposed improvements are provided and maintained in an efficient, functional and
41 integrated manner.

42

43 **23. As a professional engineer, do you have an opinion as to whether the services and**
44 **facilities to be provided by the Proposed District will be incompatible with the**
45 **capacities and uses of existing local and regional community development facilities**
46 **and services?**

1 My opinion is that the Proposed District will not be incompatible with the capacities and
2 uses of existing local and regional community facilities and services.
3

4 **24. What is the basis for your opinion?**

5 There is no duplication or overlap of facilities or services because there is no other entity
6 or unit of government presently funding or providing the improvements proposed by the
7 Proposed District. Therefore, the Proposed District will be an efficient entity to participate
8 in the construction and maintenance of the necessary infrastructure improvements.
9

10 **25. As a professional engineer, do you have an opinion as to whether the area to be
11 included within the Proposed District is amenable to being served by separate special
12 district government?**

13 Yes. The Proposed District encompasses approximately 160.278 acres. First, a project of
14 this size is large enough to support its own community with individual facility and service
15 needs. Second, the Proposed District can be utilized as a cost efficient long-term
16 mechanism to ensure that the residents of the Proposed District pay for and receive proper
17 and required maintenance. Therefore, my opinion is that the area within the Proposed
18 District is amenable to separate special district government.
19

20 **26. As a professional engineer, do you have an opinion as to whether the Proposed District
21 is the best alternative to provide the proposed community development services and
22 facilities to the area that will be served?**

23 Yes.
24

25 **27. What is your opinion?**

26 It is my opinion that the Proposed District is the best alternative to provide the proposed
27 services and facilities within the Proposed District.
28

29 **28. What is the basis of your opinion?**

30 The Proposed District is a long-term, stable, perpetual entity capable of funding,
31 constructing and, in some cases, maintaining the facilities over the lifetime of the facilities
32 because the Proposed District has the advantage of being a unit of special purpose local
33 government which has access to the tax-exempt bond market. Neither a property owners'
34 nor homeowners' association (POA/HOA) has the ability to finance infrastructure of the
35 nature and scope contemplated here, or manage the construction, acquisition or
36 maintenance of the public infrastructure. Unlike POAs/HOAs, the Proposed District has
37 statutory authority to place first-priority liens on property for unpaid assessments,
38 providing stronger collection mechanisms and financial security. Overall, the Proposed
39 District would be a more timely, reliable and cost-efficient mechanism to deliver and
40 maintain the improvements contemplated by the Proposed District.
41

1 **29. Do you have an opinion, as someone experienced in land planning, as to whether the**
2 **Proposed District is a viable alternative for delivering community services and**
3 **facilities to the areas that will be served by the Proposed District?**

4

5 Yes. It is my opinion that the Proposed District is a viable alternative for providing the
6 proposed services and facilities to the lands to be included within the Proposed District.

7

8 **30. What are the alternatives contemplated in rendering this opinion?**

9

10 There would be two alternatives to the establishment of the Proposed District, both of
11 which would be less effective. First, to facilitate economic development, accommodate
12 new growth, and provide new services, Polk County could potentially provide the selected
13 facilities, though this would likely result in increased costs to taxpayers and less focused
14 management. The second alternative would be for the developer or property owners
15 association (POA) to provide the infrastructure using private financing.

16

17 **31. Can you provide an example of a service or facility and explain why a CDD is a**
18 **preferred alternative for long-term operation and maintenance?**

19

20 Yes. An example would be a stormwater management system. By statute, CDDs and
21 property owners' associations are permitted to operate and maintain these systems.
22 However, homeowners' associations are generally required by water management districts
23 to provide significantly more information and documentation before they are authorized to
24 operate and maintain a stormwater management system. Homeowners' associations are
25 usually required to prove they have the financial resources to maintain the system, commit
26 in writing to operate and maintain it, and guarantee that the association cannot dissolve
27 until another qualified entity is in place to take over.

28

29 A CDD, which is statutorily established as a more secure financial, legal and administrative
30 entity, typically only needs to provide a letter to the water management district certifying
31 that the district will accept operation and maintenance responsibility. All things being
32 equal, a CDD is preferred over a homeowners' or property owners' association for
33 operation and maintenance of a stormwater management system.

34

35 **32. How does the Proposed District compare to these alternatives?**

36

37 By comparison to the alternatives referenced above, from a planning perspective, the
38 Proposed District is the best alternative available to provide the necessary infrastructure
39 improvements. As a special purpose "local government," the Proposed District is a stable,
40 long-term public entity capable of constructing, maintaining and managing the proposed
41 infrastructure, improvements, and facilities. The limited purpose and scope of the District,
42 combined with the statutory safeguards in place, such as notice requirements and public
43 access to district records, would ensure that the Proposed District is responsive to the
44 infrastructure needs of the Proposed District. The Proposed District would be able to obtain
45 tax-exempt, low-cost financing to provide the necessary improvements and then impose
46 special or non-ad valorem assessments upon the property owners within the District to fund

1 the infrastructure, ensuring cost-effective development and maintenance of community
2 assets.
3

4 Only a CDD allows for the independent financing, administration, operations and
5 maintenance of the land within the District. Only a CDD allows district property owners,
6 and eventually residents, to completely control the district board and, therefore, the timing
7 and extent of infrastructure improvement and maintenance. Knowing when, where and how
8 infrastructure will be needed to service the projected population of an area allows for the
9 smooth delivery of those facilities. The Proposed District exceeds other available
10 alternatives at focusing attention to when and where and how the next system of
11 infrastructure will be required for this specific area. This results in optimal utilization of
12 existing facilities before new facilities are constructed, maximizing efficiency and reducing
13 the delivered cost to the citizens being served while maintaining high-quality infrastructure
14 standards. Other alternatives do not have these characteristics.
15

16 **33. In the course of your work in Florida, have you had an opportunity to work with the
17 State Comprehensive Plan found in Chapter 187, *Florida Statutes*?**

18 Yes. In the course of producing planning documents for private development proposals, I
19 have often referred to the State Comprehensive Plan.
20

21 **34. In the course of your work in Florida, have you had an opportunity to review local
22 government comprehensive plans?**

23 Yes.
24

25 **35. At this point, I will ask you to address certain matters that are related to land use and
26 comprehensive planning. Are you familiar with the development approvals that have
27 been obtained or are being sought by the Petitioner to govern the lands within the
28 Proposed District?**

29 Yes, I am.
30

31 **36. Based upon your training and experience as a civil engineer specializing in land
32 development, do you have an opinion as to whether the Proposed District is
33 inconsistent with any portion or element of the State Comprehensive Plan found in
34 Chapter 187, *Florida Statutes*?**

35 Yes.
36

37 **37. What is that opinion?**

38 In my professional opinion, the Proposed District is not inconsistent with the applicable
39 provisions of Chapter 187, *Florida Statutes*.
40

41 **38. What is the basis for your opinion?**

I have reviewed, from a planning perspective, applicable portions of the State Comprehensive Plan which relate to CDDs. The State Comprehensive Plan “provides long-range policy guidance for the orderly social, economic, and physical growth of the state.” The State Comprehensive Plan provides twenty-five (25) subjects, and numerous goals and policies. Three subjects are particularly relevant, from a planning perspective to the establishment of CDDs: No. 15 - Land Use, No. 17 – Public Facilities, and No. 25 - Plan Implementation. Several of the policies and goals are particularly supportive of the establishment of the Proposed District.

39. Why is subject No. 15 in the State Comprehensive Plan relevant to the establishment of the Proposed District?

This goal recognizes the importance of enhancing the quality of life in the State of Florida and attempts to do so by ensuring that development is located in areas that have fiscal abilities and service capacity to accommodate growth. CDDs are designed to provide services and facilities in a fiscally responsible manner to areas which can accommodate development. The Proposed District is consistent with this goal because it will continue to have the fiscal capability to provide a range of services and facilities to a population in a designated growth area.

40. Are any of the policies under subject No. 15 relevant?

Yes. Policy 1 promotes efficient development activities in areas which will have the capacity to service new populations and commerce. The Proposed District will be a vehicle to provide high quality services in an efficient and focused manner over the long term.

41. What is Subject 17 and why is it relevant?

Subject 17 addresses public facilities. The goal is to finance new facilities in a timely, orderly and efficient manner. In particular, Policy 3 states that the cost of new public facilities should be allocated to existing and future residents on the basis of the benefits received. Policy 6 also encourages the identification and implementation of innovative but fiscally sound and cost-effective techniques for financing public facilities. Establishment of the Proposed District will further this goal and related policies.

42. Why is subject No. 25, the other subject you mentioned, relevant to the establishment of the Proposed District?

Subject No. 25 addresses Plan Implementation. This goal requires that systematic planning capabilities be integrated into all levels of government throughout the state, with particular emphasis on improving inter-governmental coordination and maximizing citizen involvement. The Proposed District will operate through a separate and distinct Board of Supervisors who will systematically plan the construction, operation and maintenance of public improvements and community facilities authorized under Chapter 190, *Florida Statutes*, subject to and not inconsistent with the local government comprehensive plan and land development regulations. Further, meetings held by the Board of Supervisors are publicly advertised and open to the public.

1
2 **43. Are there any relevant policies in this portion of the State Comprehensive Plan?**

3
4 Yes. Policy 6 encourages public citizen participation at all levels of policy development,
5 planning and operations. Under Chapter 190, *Florida Statutes*, six (6) years after the
6 establishment of a CDD, and after two hundred and fifty (250) electors reside in the CDD,
7 the election of the Board of Supervisors begins to transition from a landowner-elected
8 Board to a resident-elected Board. Regardless of whether the board is elected by the
9 landowners or the residents, the District must convene its meetings in accordance with
10 government in the sunshine provisions set forth in Chapter 286, *Florida Statutes*. This
11 encourages citizen participation in the planning and operational activities of the District.
12

13 **44. In the course of your work in Florida, have you had an opportunity to review local
14 government comprehensive plans?**

15
16 Yes. In fact, I have reviewed the Polk County Comprehensive Plans many times in the
17 course of my work.
18

19 **45. Based upon your training and experience as a land development engineer, do you
20 have an opinion as to whether establishment of the Proposed District is inconsistent
21 with any portion or element of Polk County's Comprehensive Plan?**

22
23 Yes, I do.
24

25 **46. What is that opinion?**

26
27 In my professional opinion, the establishment of the Proposed District is not inconsistent
28 with any applicable provisions of the Polk County Comprehensive Plans.
29

30 **47. Does this conclude your testimony?**

31
32 Yes, it does.