



**Executive Summary of Guardians Position on Construction and Operation of a Grassfed Beef Meat Processing facility at Chancey Bay Ranch in Western Martin County, FL
November 21, 2025**

In early 2025, the Guardians of Martin County (Guardians) became aware that the Florida Department of Agriculture and Consumer Services (FDACS) had recently determined that construction and operation of a commercial meat processing facility at Chancey Bay Ranch (CBR) in northwestern Martin County would not be subject to review and approval by Martin County.

While necessary, meat processing facilities have the potential to be nuisances and significant sources of water, noise, and air pollution and disease vectors.

Soon after learning of the proposed project, the Guardians sought to learn more about the proposed facility and related activities in order to determine potential impacts on the environment and growth management. When it became apparent that comparatively little information about the project was available through normal inquiries, the Guardians requested information about the project through a Freedom of Information Act (FOIA) request to FDACS, while simultaneously researching environmental effects of similar projects located elsewhere.

Although the Guardians reserve the right to modify this position paper as new information becomes available, the attached Draft position paper identifies the current status of the results of this research, and identifies issues associated with the facility in the following thematic areas:

Legal Authority: The Guardians have identified three critical legal questions regarding the proposed project: 1) Whether Florida law permits slaughterhouse operations to qualify for agricultural exemptions under Right to Farm Act; 2) What legal weight do agency general counsel opinions carry, and who, if anyone, is bound by such opinions?; and 3) Whether FDACS has direct regulatory authority over meat processing plants, or does this authority rest with the USDA?

Environmental Issues:

- **Water Use/Water Withdrawal** – the proposed facility has been permitted by the South Florida Water Management District (SFWMD) to withdraw 6.7 million gallons per year from Florida’s surficial aquifer for 20 years, in spite of the surficial aquifer in much of Martin County being subject to varying levels of saltwater intrusion and all of Martin County being designated by SFWMD as a Water Resource Caution Area;
- **Water Quality/Pollution** – the proposed facility is a new source of potential pollution in a watershed that is presently designated as “Impaired” due to elevated concentrations of Phosphorus and Nitrogen; No evidence of Effluent Limitation Guidelines, an NPDES permit or water quality monitoring have been found.

- **Potential impacts on flora and fauna** – if the proposed project is exempted from Martin County’s review, the County’s inability to require a Preserve Area Management Plan (PAMPs) would result in greater environmental impacts than if the project was required to meet the requirements of Martin County’s Comprehensive Growth Management Plan and Land Development Regulations; and
- **Equity and Social Justice** – the proposed facility is a potential new source of pollutants near one of Martin County’s lowest income and most ethnically diverse communities.

The Guardians have reviewed publicly-accessible information regarding meat processing facilities in general, the Chancey Bay Ranch proposal in particular, and other pertinent information, and has determined that, in our opinion, Martin County has the legal authority and responsibility to ensure that the proposed project is designed, constructed and operated in a manner that complies with existing county regulations. As described hereafter, because the proposed facility is likely to involve the transportation of large numbers of cattle onto Chancey Bay Ranch the purpose of grazing and an adjoining property for meat processing, the Guardians believe that Martin County not only has the authority, but also the responsibility to analyze effects of the project on traffic, water and air quality, public health and other related concerns in order to ensure the operations meet the requirements of the County’s Comprehensive Growth Management Plan and Land Development Regulations.

The Guardians recognize the need for meat processing facilities, and are not necessarily opposed to the proposed facility.

We believe that with adherence with Federal, State and local (i.e., Martin County’s CGMP and LDRs) requirements, the operation can be designed, constructed and operated in a manner that does not create a nuisance nor result in unacceptable adverse impacts.

Lacking the ability by Martin County to exercise its authority over the proposed facility, the County’s residents and visitors are at the potential risk of increased exposure to water-related problems and other nuisances.

Until the fundamental legal questions identified described more thoroughly in Appendix 1 are resolved through independent analyses, the Guardians believe that Martin County should proceed with its comprehensive development review process under its established regulatory authority.

The questions raised by FDACS's opinion, combined with the apparent evolution in county legal positions, are significant enough to warrant thorough independent legal research before any county regulatory authority is relinquished.