

FORMAL OPPOSITION STATEMENT: WILDFLOWER MUSIC PARK, MELROSE, FLORIDA

Melrose, Florida is one of the last communities where “Old Florida” is still accessible. Families like mine have lived here for generations, forced to watch our communities eroded by out-of-state land developers who treat our state like a blank check.

The proposed *Wildflower Music Park* is not only a poor fit, but the organizers’ classification of a 270-acre commercial entertainment complex as a “rural event center” under agricultural zoning seems an attempt to sidestep the rigorous processes typically required for such projects. Why? To avoid full rezoning, environmental review, infrastructure obligations, and public accountability.

Wildflower Music Park is exploiting a Temporary Use Permit to operate a permanent, commercial-scale (festival without undergoing the full rezoning, public hearings, and environmental impact reviews that Alachua County law requires. Temporary Use Permits are designed for short-term agricultural events, not multi-day, ticketed entertainment complexes. Under the Alachua County Unified Land Development Code (ULDC), the land is zoned for agricultural or low-density residential homes, not stages, crowds, overnight camping, and multi-day events.

This effort violates *Keene vs. Zoning Board of Adjustment* (2009), which held that special use permits cannot serve as backdoor commercial conversions. Wildflower’s actions constitute de facto rezoning by stealth, undermining the peace, safety, and rural character of our community.

This is not a benevolent arts project. It is a leveraged, donor-dependent commercial venture. The financial structure alone reveals its true nature:

- Wildflowers Music Park Finance LLC (Florida LLC) lists Charles J. Puryear (NY) and Robert K. Hutchinson (FL) as managers.
- Wildflowers Music Park Inc., a Florida-based “non-profit”, which lists Hutchinson as the registered agent and Puryear as officer.
- Hutchinson admits they took out a \$2.6M land loan, already relying on ticket sales and other funding to repay the borrowed funds.
- The developers claim to have secured \$1M in donor funds, funneled through the Community Foundation of North Central Florida, though no documented exchange of funds has been made available.
- Originally pitched as a GrassRoots Festival expansion, GrassRoots publicly denied involvement¹, stating that Puryear is “not their director” and that “Northern Florida will not be the winter home of the GrassRoots Festival”. That undercuts any institutional credibility the project claims.

If this were truly about art and community, there would be no need for layered LLCs, missing financial disclosures, or borrowed credibility. These interlocking entities obscure ownership and accountability, structures better suited for private equity than public arts.

Approval of Wildflower would also set a dangerous precedent allowing future developers to reclassify large commercial venues as “rural event centers.” Once this loophole is exploited, it cannot easily be undone. It would fundamentally alter rural zoning enforcement countywide.

As a researcher with a leading national nonprofit in public safety, I am also acutely aware of how poorly planned events can lead to disaster (see Powder Ridge Rock Festival in Connecticut, FirstBank Amphitheater in Tennessee, Kurt Cobain Days in Washington, and even Astroworld in Texas).

¹ <https://www.wuft.org/business-news/2024-09-20/national-festival-organization-looks-to-expand-into-alachua-county>

Wildflower's plan mirrors those same mistakes. "Just give it a try!" they say, but remember that once that door is opened, it cannot be closed again. Here is the truth the organizers can't hide:

- **Roadway Safety:** State Roads 21 and 26 are classified by FDOT as of "Rural Town" (C2T)² roads. These roads are designed to carry only *single- to low-double-digit thousands* of vehicles daily, not high-volume special events per FDOT. Injecting thousands more vehicles practically overnight would gridlock both roads, block emergency routes, and significantly increase the risk of crashes and injury on already high-risk roads. Alachua County requires traffic studies and mitigation for developments that *materially impact state roads* (as this would). Wildflower has not submitted any credible Traffic Impact Study on how the bottleneck town of Melrose could possibly survive doubling, if not tripling, its population overnight.
- **Water and Sewer Concerns:** We don't use municipal water or sewer services. Instead, residents rely on private wells and septic systems. A 270-acre festival and campground will generate huge volumes of wastewater, gray water, and chemical runoff with no engineered containment. Those contaminants will leach into the Floridan Aquifer, the same drinking water source residents rely on. Once tainted, wells are lost, and *our* property values drop. Research has linked events like these to public health risks, directly resulting from wastewater mismanagement, stormwater runoff, and pathogens or drug residues entering groundwater and nearby surface waters^{3,4,5}.
- **Stormwater and Flooding:** The site's impervious surfaces (e.g., parking, staging areas, stages, roads) will also greatly increase stormwater runoff. Under the ULDC and Florida's ERP (Environmental Resource Permit) rules, developers must demonstrate zero net increase in post-development discharge. Runoff carrying fuel, oil, and waste will flow directly into Lake Santa Fe's watershed and the Santa Fe River basin, both classified as Outstanding Florida Waters⁶ under FDEP protection. In Alachua County, the aquifer is already mapped as moderate-to-high vulnerability, which will only be amplified by the multiple large-scale and unplanned events already being planned by organizers. In fact, as of 2021, average water flow in the river and nearby springs has dropped nearly 30%⁷. Wildflower could easily mimic documented incidents, where unmanaged runoff has caused illness, environmental damage, and thousands of dollars in taxpayer dollars (*see Woodstock '99 or Glastonbury Festival 2021 for large-scale examples*).
- **Destruction to the Environment:** Wildflower Music Park is adjacent to wildlife corridors protected by the Florida Wildlife Corridor Act (2021). It is well-documented that artificial light⁸ and noise⁹ have detrimental impacts on wildlife, impacting migration, breeding cycles, and resource availability. Robert Hutchinson has claimed publicly that Wildflower will be a place "where music, dance, *land stewardship*, and community will meet beneath the live oaks and stars". I ask Mr. Hutchinson to explain how clearing our already limited agricultural land, congesting our roads, and polluting our wildlife with noise and light is serving as a "steward for the land". In fact, land clearing, lighting, and noise pollution will devastate habitats for gopher tortoises, sandhill cranes, and other protected species in the area, driving displaced wildlife into populated neighborhoods where they will face vehicle strikes, domestic predators, and loss of foraging habitat.

² <https://northfloridatpo.com/uploads/Studies/SR-21-SR-100-Intersection-Safety-and-Operational-Improvements-FINAL-October-2023-2.pdf>

³ <https://pubmed.ncbi.nlm.nih.gov/23517872/>

⁴ <https://pubmed.ncbi.nlm.nih.gov/19001721/>

⁵ <https://www.sciencealert.com/music-festival-sees-spike-in-mdma-pollution-in-river>

⁶ https://floridadep.gov/sites/default/files/OFW%20factsheet_0.pdf

⁷ https://floridaspringsinstitute.org/wp-content/uploads/2021/07/Lower-Santa-Fe-River-Phase-1_Final1.pdf

⁸ <https://www.nwf.org/Home/Magazines/National-Wildlife/2023/Summer/Conservation/Light-Pollution-Wildlife>

⁹ https://www.nps.gov/subjects/sound/effects_wildlife.htm

- **Increased Risk of Fires and Property Damage:** Furthermore, with on-site camping and open-field stages admit flammable pine flatwoods and dry environments, wildfire risk is non-trivial. Alachua County is already at a greatly increased risk for wildfire¹⁰, with areas like Melrose designated by Alachua County as moderate-to-high risk due to the wildland-urban interface¹¹. In fact, it is outright stated that *“homes along the wildland-urban interface and agricultural interests are the most vulnerable.”* Yet no fire suppression plan, dedicated water supply, or evacuation route analysis has been submitted, or even proposed, leaving festivalgoers, residents, and fragile ecosystems vulnerable to potentially catastrophic wildfires. Under Alachua County’s 2021 Mitigation Strategy, such conditions should automatically trigger heightened review and scrutiny of this project and any future attempts to bypass formal review.
- **Emergency Services Already Stretched Thin:** We live in a tri-county zone (Alachua, Putnam, Clay). Our EMS resources must traverse county lines, rely on tireless volunteers, and face long travel and infrastructure gaps. According to Gainesville Fire Rescue, average travel times have increased to nearly 7 minutes¹², well above national average. Doubling population overnight brings risks: with thousands of additional people brings thousands of potential medical emergencies, dehydration, crowd-related injuries, and the use of illicit drugs and alcohol that is *statistically proven* to increase during these types of festivals¹³. Those extra demands will be fatal for response coverage and draining on residents, many of whom are elderly or disabled, who depend on timely care.
- **Public Disturbance:** According to research, concert noise levels can hit between 90 to 120 decibels. This property is surrounded by residential parcels in both Alachua and Putnam counties. Hundreds of households lie within a two-mile radius of likely sound impact. Bass and amplifiers travel miles, and residents will suffer nonstop intrusion. Studies show that even sustained outdoor noise above 40 decibels elevate stress hormones, blood pressure, and insomnia risk. These types of events are also shown to increase crime rates^{14, 15, 16} and the use of illicit drugs and alcohol, which is not ideal for a community that is already suffering from addiction and overdoses on the daily. This is not just a broad appeal, but an appeal for those families who purchased their homes to live in a quiet neighborhood, not across the street from a music festival drawing thousands of strangers to their backyards.

To those drawn to the promise of Wildflower, I understand the appeal of music and community, but this is not that. The organizers are exploiting agricultural loopholes to bypass environmental study, infrastructure obligations, and transparency. They call it “rural,” but it’s a commercial enterprise that shifts the noise, traffic, waste, and risk onto us. The costs here (financial, environmental, and social) will far outweigh any short-term gain.

It takes one look at the Wildflower Music Park Facebook page or the community-driven Melrose Word of Mouth to see that organizers are attempting to silence most Melrose residents who oppose this project and simply want to enjoy peace and quiet in their own neighborhood. *Renard v. Dade County (Fla. 1972)* states that residents “adversely affected” by a zoning decision have the legal standing to challenge it.

¹⁰ <https://www.wildfirerisk.org/explore/wildfire-likelihood/12/12001>

¹¹ <https://alachuacounty.us/Depts/EM/Documents/ADACompliant/Alachua%20County%20Local%20Mitigation%20Strategy.pdf>

¹² <https://www.wuoft.org/public-safety/2024-07-25/overtime-and-under-pressure-gainesville-fire-rescue-deals-with-understaffing-high-call-volumes-and-increasing-travel-times?>

¹³ https://cdn2.psychologytoday.com/assets/music_and_substance_use_a_meta_analytic_review.pdf

¹⁴ <https://scholarworks.umass.edu/server/api/core/bitstreams/65a31042-a7e0-4690-9746-7e9917d0b137/content>

¹⁵ <https://www.yahoo.com/news/arrests-coachella-stagecoach-festivals-see-040452874.html>

¹⁶ <https://www.unlv.edu/sites/default/files/media/document/2023-10/Sexual-Harassment-and-Violence-at-Music-Concerts-and-Festivals-V2.pdf>

Further, the *Bert J. Harris, Jr. Private Property Rights Protection Act* empowers property owners to seek financial compensation when a development inordinately burdens their rights through noise, pollution, traffic, or loss of quiet enjoyment (as I am confident this will).

Melrose's population is roughly 5,000. These events would *double* if not *triple* the population overnight with temporary festivalgoers who have no stake in the health and wellbeing of this community. The peaceful, agriculture-driven, rural town that drew people in will be overrun with traffic, noise, litter, safety risks, and chaos. The ULDC defines 'rural event center' as small-scale, occasional, and community-serving, not a permanent entertainment complex using special permits as a backdoor to develop. Florida has already lost an estimated 300,000 acres of farmland to development, with 2.2 million acres estimated to be lost by 2070. Protecting Florida starts with protecting the community, *our* community, from non-residents in high-rises who don't care what they destroy or who they inconvenience for a quick dollar.

Thank you for your consideration.

An Eight Generation Floridian