



The Facts

Official News and Information



September 30, 2025

Town Manager's Commitment

Professional management is essential to effective, efficient, fair, and democratic local government.

As a local government management professional, I am committed to keeping the Juno Beach community informed on local government affairs.

This newsletter is intended to support informed public participation in local government decisions, promote public transparency, and provide a trusted source for official news & information of interest to the Juno Beach community.

Cheers,
Rob Cole
Town Manager
rcole@juno-beach.fl.us

The Facts: Welcome, Juno Beach!

Welcome to this edition of *The Facts* newsletter.

For many years, I was a licensed falconer. In compliance with federal regulations under the Migratory Bird Treaty Act, I captured wild raptors and then trained and hunted with them. Each raptor was released back into the wild in the spring, following conclusion of the hunting season. As a former falconer, I take note when migratory birds undertake their spectacular seasonal journeys, as they are today with the [fall migration now occurring](#). 29.5M migrant birds were estimated to have crossed Florida last night, alone.

Guided by an inner compass, billions of birds confront myriad obstacles to success, both individually and as flocks working together to accomplish their mission. Their path is never a straight line. Adjustments need to be made along the way – some by choice, and others in response to forces they do not control. Often, the options available are not ideal, and the decision-making support is imperfect. Yet, decisions must nonetheless be made; for migratory birds, sitting idle while their world changes around them yields catastrophic consequences. Our human world is not that different.

Fortunately, most local government public policy decisions are not catastrophic in the same sense. However, we are nonetheless charged with making decisions, typically involving imperfect information and sometimes from a menu of less-than-ideal solutions. Let's work together to make the best decisions we can.

Warmly,
Rob Cole, Town Manager

The Facts: Single-Family Appearance Review

The Facts: “Council Discussion on Site Plan and Appearance Review for Single Family Homes” appeared on the [September 24](#) Town Council agenda and **no consensus direction was reached**. The discussion was concluded without any next steps having been identified. Against that backdrop, staff advised Town Council that their review and processing of single-family development applications will be conducted in a manner consistent with the law, which **precludes** the use of architectural review, consideration of building design elements, and the use of pass/fail metrics not appearing in the Town Code.

Additional Background

The [September 10](#) edition of **The Facts** (pages 2 through 6) provides information and background necessary to inform one’s participation in the public conversation surrounding Single-Family Appearance Review. If you have not read the information, you may find it helpful.

That written, there seems to be continuing lack clarity concerning the conditions under which subjective review is likely to be deemed **legally sufficient**. Importantly, the issue at hand **is not** whether subjective review is permissible under the law, *as it clearly is*, but whether our rules and supporting administrative processes bear the **necessary hallmarks of enforceable subjective land use regulations**, reasonably anticipated to withstand legal challenge.

Key hallmarks of legally sufficient subjective review frameworks include, among others:

- **Clear standards and guidelines.** Specific standards and guidance for their proper consideration, e.g., design manuals, architectural criteria, or other codified information; our framework **lacks** clear standards and guidelines. These are necessary for the regulated public to know the rules/law, as well as for our professional staff and P&Z Board to properly apply them. Here are a couple examples of clear standards and guidelines from a quick Google search:
 - https://www.coralgables.com/sites/default/files/2023-10/Design-Best-Practices_SFR_2021sm-EK.pdf (68 pages)
 - <https://www.naplesgov.com/media/96081> (48 pages)
- **Administrative consistency.** The clear standards and guidance must be applied fairly and consistently. The Town Council has been advised that staff are unable to achieve this requirement due to the absence of clear standards and guidelines. It seems that the P&Z Board may have experienced this challenge, as well.

Our staff and some members of the Planning and Zoning Board have indicated that our standards **are not clear** to them, in that they **lack necessary implementation guidance**; the standards are **not clear to the regulated public**, and therefore fail to provide fair advance notice of what is demanded of them; and, the standards **can't be applied fairly and consistently**.

Despite efforts to draw a parallel between the legal defensibility of Palm Beach's regulatory framework and the legal standing of Juno Beach's, **the two are nothing alike** and form an **invalid comparison**. Not only does the Palm Beach rubric rely upon architectural review, which we are **prohibited by law from using**, but their standards and implementation guidance are incomparably more detailed than our handful of words with simple dictionary definitions and no criteria to apply them. Absent more specific criteria on how words like bulk, mass, scale, height, proportion, etc., are to be applied, the only codified criteria that staff have available to interpret these words are the base zoning requirements, which clearly specify the limits for acceptable single-family development and can be applied fairly and consistently in rendering a recommendation or application approval/denial.

Accordingly, staff reported to Council at the September 24 meeting the following:

- Staff will continue to validate applicant **compliance with base zoning regulations** before advancing an application for P&Z Board final approval or denial.
- Staff will **discontinue** the use of pass/fail metrics that do not appear in the Town Code and will not represent to applicants that compliance with such metrics may increase the likelihood of approval.
- Staff **will not use architectural review or building design elements** for Appearance Review; associated text in the code indicating such review criteria will not be enforced or considered by staff in making any application recommendation, nor will they suggest to applicants that any related changes may increase the likelihood of approval.
- Staff **will provide P&Z Board with a data sheet**, inclusive of associated factual summary, as well as analysis of Appearance Review criteria not otherwise precluded by (1) or (2) above – no staff recommendations for approval or denial will be offered. If asked for a recommendation, staff will use base zoning compliance as the determining factor, i.e., a property in compliance with base zoning will receive a recommendation for approval. As the Town Code specifies, final approval or denial authority rests with the P&Z Board.

In closing on this subject for now, I'll note that I've always been taught that *if one doesn't like the laws, change them; ignoring them is not an option*. In this case, **we are statutorily prohibited from changing our laws to be more restrictive or burdensome**. Therefore, to the extent that Town Council and the community wish to exert design influence on single-

family development projects, such effort needs to productively focus on supporting and codifying the best available **voluntary compliance** measures, as presented in prior Town Council meetings on this topic. At the same time, we still need to bring our Town Code into compliance with state law, of course.

Palm Beach County Transportation Plan

The Facts: Through a planning process titled [Palm Beach County Moves](#), Palm Beach County is amidst development of a Countywide Transportation Master Plan (CTMP). The effort is focused on establishing a common vision and goals to effectively plan the region's future transportation and mobility. Juno Beach community members are encouraged to participate. There are [upcoming meetings](#), as well as a [Community Survey](#) and a [Local Business Survey](#) for those interested in sharing their needs and perspectives.

Additional Background

Local residents and businesses are strongly encouraged to participate in the process, as the decisions made through the planning study will guide future transportation policy and investments. ***Now is the time to help shape such decisions.***

The Facts: Fun Fact

With each newsletter, I conclude with something of personal interest, not necessarily associated with our local context, ranging from a personal photo I've taken to a recent news article of interest . . . to *who knows what* – the idea is simply to allow each of you to get to know me not just as the Town Manager, but as a person you have some familiarity with, even if we have not had the opportunity to meet in person. Of note, I am available to meet with community members to discuss any topic of interest – just reach out to schedule: rcole@juno-beach.fl.us.

For today, I'll simply share some bird photos from my backyard.



Thank you for caring enough about Juno Beach local government affairs to read ***The Facts***.