

Exhibit S - Justification Statement

THE WELLINGTON SOUTH

Future Land Use Map Amendment

Master Plan Amendment

Justification Statement

May 5, 2023

Introduction

The Subject Property comprises 288 acres, consisting of 15 parcels located within the Wellington Countryplace PUD. Specifically, the Subject Property includes Pod E (Phases I and II), Pod F (Phases V, VI, and VII), and Pod G (Phases I and II). The Subject Property is owned by key stakeholders in the community Wellington Equestrian Partners (WEP), Wellington Residential Holdings (WRH) and Global Equestrian Group (GEG), collectively referred to as the Applicant, are working together to protect, expand, and enhance Wellington's equestrian community for now and into the future. WRH and WEP have spent over 15 years and hundreds of millions of dollars developing and expanding the equestrian industry in Wellington. The primary driver of the equestrian economy is the Wellington International (formerly Palm Beach International Equestrian Center). The existing 80-acre showgrounds consist of 18 competition arenas and 256 permanent stalls, along with bridle trails, pedestrian and golf paths, and exclusive restaurant and shopping areas. Wellington International is home to the 12-week Winter Equestrian Festival, as well as other spring and fall events which established the showgrounds as a world-renowned equestrian facility and garnered the Village of Wellington's current title as the 'Winter Equestrian Capital of the World.' WEP, in July of 2021, sold to GEG Wellington International and its operating company Equestrian Sport Productions (ESP), with the goal of partnering with a world-class team focused on expanding this global equestrian sport and enhancing this vital community amenity. Four WEP partners remain investors in GEG, Mark Bellissimo, Roger Smith, Marsha Dammerman, and Lisa Lourie.

Over the last twenty years, Mark Bellissimo and other local Wellington families have assembled a collection of well-located lands, spanning a total of 600 acres, that present an extraordinary opportunity to add an enduring and enriching asset to the Wellington community. In the fall of 2022, Bellissimo asked NEXUS Luxury Collection, backed by Joe Lewis, Tiger Woods and Justin Timberlake and the developer behind Albany in The Bahamas, to plan, design and build a spectacular community in the heart of horse country. One that celebrates the best of South Florida living and complements the equestrian community and heartbeat of Wellington. Together the partnership, called Wellington Lifestyle Partners (WLP), is proud to introduce "The Wellington", envisioned to be a private community that adds to and accentuates the sport and equestrian lifestyle that has come to define the Village of Wellington over the last four decades. The Wellington will be a thoughtfully designed community encompassing several distinct tracks of land that will all be linked by a common design philosophy. The Wellington is comprised into three projects: The Wellington South is included within this petition, The Wellington North is proposed in a separate concurrent petition, and The Wellington Market is a commercial project open to the public which will be submitted in a separate future petition.

The Wellington will respect open spaces and add luxurious landscaping and garden-like settings to provide the perfect canvas for walking trails, pathways and avenues. Canopied streets and sidewalks will meander throughout the community creating pockets of new development that will showcase some of the finest modern sporting amenities found anywhere in the world. Complementing the collection of amenities will be stunning architecture supporting an array of single-family homes found in farm-like settings and

residential enclaves with wooded and water views. The Wellington North will include luxurious low-rise condominium residences centered around an approximately 18-acre Central Park – all with the vision of bringing a new level of sophisticated living to the area.

The Wellington will blend many elements that make a modern club community, and over time will add ancillary amenities and assets within the master plan that continue to enhance and elevate life in the Village of Wellington from expanded conservation lands, walking trails and bridal paths concentrated around a designed town center that is pedestrian friendly, charming, and capable of showcasing and supporting new hotel, office, retail and restaurant offerings for the Village of Wellington that are more routinely found in Palm Beach.

Together, the Applicant have a vision to establish the Village as the *year-round* Equestrian Capital of the World. To accomplish this, they seek to expand Wellington International by adding 114.65 acres to the existing site. The expansion will essentially create north and south showgrounds sites that are integrated through multi-modal paths. The proposed south showgrounds will accommodate a new approximately 206,000 square foot equestrian facility that includes viewing, dining, and retail spaces, as well as additional arena areas and stalls. The total 195-acre unified center will provide a comprehensive equestrian experience, showcasing state-of-the art equestrian amenities and attracting elite riders and equestrian-enthusiasts from around the world.

Wellington International is not just an equestrian sports destination, but it is also an integral component of the Village's character and community. It is similarly supported by the community, in a symbiotic relationship. One of the key differentiators with Wellington and this facility is that the showgrounds are surrounded by both residential and equestrian communities, including the adjacent communities of Mallet Hill to the east and Equestrian Club Estates to the south. These communities contribute to a live, work, and play environment that encourages investment in the community in both barns and housing. Village residents use the community bridle paths, train at the equestrian facilities, and walk, ride, or golf cart to equestrian sporting events. The residential component is necessary to create and support the equestrian lifestyle and community that the Village is known for. The expansion of Wellington International will require residential communities that are intentionally and properly integrated with the showgrounds and the community to preserve and enhance the Village's equestrian lifestyle and support its equestrian industry.

The Subject Property, which surrounds Wellington International and its adjacent residential communities, is vacant except for minimal equestrian structures and the temporary polo field. Although vacant, the Subject Property is currently approved for 199 residential units allocated throughout the parcels. The Applicant seeks to reallocate (and decrease) those residential units so that the Subject Property's footprint can accommodate the showground expansion. The western 114.65 acres of the Subject Property (Pod F Phases V, VI, and a portion of VII) will house the south showgrounds. The eastern 155.24 acres of the Subject Property (Pods E and G) will contain a high-end, gated community with 197 single-family residences (2 fewer than currently approved for the property), to be known as "The Wellington South".

It should be noted that while the Applicant requests 197 dwelling units within the petition, the conceptual site plan shows 148 single-family dwelling units. The Applicant intends to bank the additional 49 units at this time. The 148 single family units on the conceptual plan include 143 lots ranging from 0.25 acres to 0.50 acres. Additionally, the Applicant's conceptual plan proposes 5 "farms" which each exceed 4-acres in size. The farms are a result of the feedback from the Village in previous submittals and the location of them provides for a seamless transition within the immediate adjacent properties. The proposed setbacks

for the farms are 25-feet on all property boundaries. Table 6.8-2 of the code for the EOZD Overlay District within Subarea D identifies 100-foot front and rear minimum setbacks, a 50-foot side minimum setback, and an 80-foot corner minimum setback. The proposed reduction for the farm setbacks utilizes a similar approach as established within Grand Prix. It should also be noted that Mallet Hill was approved with even smaller setback requirements. As a result of the surrounding community analysis, the proposed 25-foot setbacks for the farm properties provides for an it is an appropriate transition between this project and Mallet Hill.

The 18.22 acres located between the new showgrounds and The Wellington South (the remaining portion of Pod F Phase VII) will have equestrian amenities available to the Estate's residents. The extent of the amenities included will be subject to the release of a conservation easement on a 12-acre portion of the 18.22 acres which is being sought through a separate application with the South Florida Water Management District. The residential equestrian amenities, along with the existing preserve area, create an organic transition between the showgrounds and the proposed residential community. The residents will have access to the equestrian amenities via a private golf cart path. Public multi-modal transportation, including improved bridle trails and golf cart and pedestrian paths, will integrate the Subject Property's equestrian and residential uses and connect the site to the surrounding residential communities.

Wellington was the trailblazer in creating an integrated equestrian community, and it has become a model for other communities. While Wellington currently has a deeply rooted foothold in the global equestrian industry, the market is competitive, and it is continuing to grow. Recently, the largest equestrian complex in the country was developed in Ocala, Florida. The 7,000-acre self-proclaimed "World Equestrian Center" is an equestrian destination that provides world class equestrian amenities, residential communities, hotels, shopping, and dining. In short, they are seeking to compete with Wellington's success. In addition, Terra Nova, in Sarasota has begun the marketing of its property, with the "Live, Ride, Compete" tagline and will be competing with hunter jumper dates in the winter, spring, and fall. The applicant believes that there will be a more aggressive transition to the equestrian lifestyle and more competitors will enter the space both nationally and internationally. Globally, there are strengthening winter circuits in Spain, Portugal, and Italy. To preserve the Village's stake in the equestrian industry and establish our community as the true Equestrian Capital of the World, the showgrounds must be expanded and enhanced, and high-end residential opportunities and lifestyle elements must be augmented to support those equestrian facilities. Wellington must take the next step forward or be forced back.

To allow the Village to continue as the true Equestrian Capital of the World, the Applicant, Wellington Residential Holdings, LLC ("Applicant"), is proposing a series of development requests (collectively, the "Application" or the "Project"):

- 1) Future Land Use Map Amendment: application to change the future land use for Pod F (Phase V, VI, and a portion of VII), totaling 114.65 acres, from Residential B to Equestrian Commercial Recreation;
- 2) Future Land Use Map Amendment: application to change the future land use for Pod E (Phase I and a portion of Phase II), Pod G (Phase I and II), and Pod F (a portion of Phase VII), totaling 173.46 acres, from Residential B to Residential C;
- 3) Future Land Use Map Amendment: application to change the future land use for Pod E (remaining acreage of Phase II), totaling 5.798 acres, from Commercial to Residential C;
- 4) Master Plan Amendment: application to (i) consolidate Pod E (Phase I and II), Pod G (Phase I and II), and the 18.22-acre portion of Pod F (Phase VII) to be referred to as 'Pod E'; and (ii) amend the land use designations and densities for Pod F (Phase V-VII) and the newly formed Pod E;

- 5) Conditions of Approval Modification: application to amend the previous conditions for the Master Plan;

This Justification Statement addresses below each of the six concurrent applications above. These requests are brought parallel to the Applicant's development requests for the project known as "The Wellington North," which proposes a second high-end residential community to support the expanding equestrian industry and integrated community envisioned in this Application. This Application is also brought ahead of the project known as The Wellington Market which adds office space, retail, restaurants, entertainment, additional residential options and a hotel to nearby property to create an integrated mix of uses that support and enhance the Village's equestrian industry and lifestyle, which is necessary to solidify its designation as the Equestrian Capital of the World.

Project Contacts:

Wellington Residential Holdings, LLC

Mark Bellissimo
Paige Bellissimo
3367 120th Avenue S
Wellington, FL 33414
Phone: (561) 459-6800
E-mail: mbellissimo@coth.com
E-mail: paigeb@buildz.com

NEXUS Luxury Collection

Douglas McMahan
9350 Conroy Windermere Road
Windermere, FL 34786
Phone: (407) 406-4466
E-mail: dmcMahon@tavistock.com

Dunay, Miskel, Backman, LLP

Bonnie Miskel, Esq.
David F. Milledge, Esq.
14 SE 4th Street, Suite 36
Boca Raton, FL 33432
Phone: (561) 405-3300
E-mail: bmiskel@dmbblaw.com
E-mail: dmilledge@dmbblaw.com

Sexton Engineering

Mike Sexton, P.E.
110 Ponce de Leon Street, Suite 100
Royal Palm Beach, FL 33411
Phone: (561) 792-3122
E-mail: msexton@sextonengineering.com

Cotleur & Hearing

Donaldson Hearing, ASLA, PLA, LEED
Nicole Plunkett, ASLA, PLA, AICP
1934 Commerce Lane, Suite 1
Jupiter, FL 33458
Phone: (561) 747-6336
E-mail: dhearing@cotleur-hearing.com
E-mail: nplunkett@cotleur-hearing.com

Simmons & White

Bryan Kelley, P.E.
2581 Metrocentre Boulevard, Suite 3
West Palm Beach, FL 33407
Phone: (561) 478-7848
E-mail: bryan@simmonsandwhite.com

Gunster, Yoakley & Stewart, PA

Brian M. Seymour, Esq.
S. Kaitlin Dean Guerin, Esq.
777 South Flagler Drive, Suite 500 East
West Palm Beach, FL 33401
Phone: (561) 561-650-0557
E-mail: bseymour@gunster.com
E-mail: kguerin@gunster.com

Location

The Subject Property is located at the northwest corner of South Shore Boulevard and Lake Worth Road, east of Gene Mische Road. The Subject Property is surrounded by equestrian and residential uses, including Wellington International, the Equestrian Club Estate, Mallet Hill, and Mida Farms. The Subject Property has approximately 2,600 feet of frontage along Gracida Street and 2,700 feet of frontage on South Shore Boulevard.

Properties/Ownership

The subject property consists of 15 different parcels with 10 different owners as provided below.

Owner	PCN	Date Acquired
Far Niente Stables, LLC	73-41-44-21-11-001-0000	08/15/2005
	73-41-44-21-06-000-0010	08/23/2005
Far Niente Stables III, LLC	73-41-44-21-00-000-7020	12/23/2005
Far Niente Stables IV, LLC	73-41-44-20-20-001-0000	12/23/2005
Far Niente Stables V, LLC	73-41-44-20-20-000-0010	09/08/2020
	73-41-44-20-20-000-0020	09/08/2020
Far Niente Stables VII, LLC	73-41-44-21-00-000-3010	11/19/2007
Far Niente Stables XXV, LLC	73-41-44-20-20-000-0030	11/18/2019
	73-41-44-20-20-000-0040	11/18/2019
Far Niente Stables XXVI, LLC	73-41-44-20-20-000-0050	11/18/2019
	73-41-44-20-20-000-0060	11/18/2019
TLJ Polo, LLC	73-41-44-20-20-000-0070	11/15/2019
Wellington Showgrounds 1, LLC	73-41-44-20-20-000-0080	03/11/2022
	73-41-44-20-20-000-0090	03/11/2022
Second Wellington, Inc.	73-41-44-21-06-001-0000	11/04/1982

All properties were conveyed by deed with the exception of the property held by Second Wellington, Inc. which was conveyed by plat dedication. Upon information and belief, the Subject Property has not been recently subject to a homestead exemption.

Land Use and Zoning

The Subject Property's future land use designation is Residential B and its current zoning designation is Planned Unit Development (PUD) within the Equestrian Overlay Zoning District (EOZD). The operative Wellington Countryplace PUD Master Plan approved the following uses for the Subject Property:

- Pod E (Phase I) – 39 dwelling units
- Pod E (Phase II) – 60 dwelling units and 92,347 square feet of commercial (5.3 acres at 0.4 FAR)
- Pod F (Phase V) – 2 dwelling units
- Pod F (Phase VI) – 7 dwelling units
- Pod F (Phase VII) – 53 dwelling units
- Pod G (Phase I) – 18 dwelling units

- Pod G (Phase II) – 20 dwelling units

The properties immediately adjacent to the Subject Property are:

SURROUNDING PROPERTIES			
DIRECTION	PROJECT	FUTURE LAND USE	ZONING
NORTH	Wellington International Equestrian Club Estates	Equestrian Commercial Rec. Residential C	PUD/EOZD
SOUTH	Palm Beach Point East	Residential A	ER
EAST	Southfields	Residential B	PUD/EOZD
WEST	Grand Prix Farms	Equestrian Commercial Rec. Residential B	PUD/EOZD

Traffic/Multi-Modal Connectivity

The expansion of the showgrounds and reallocation of the residential uses on the Subject Property provide a unique opportunity to re-envision and re-establish the Subject Property, and the surrounding uses, as an integrated equestrian community for the future of Wellington. Gene Mische Way runs north/south along the west boundary of the Subject Property between Gracida (40th Street) and Pierson Road and is proposed to provide two-way vehicular ingress/egress access to both the north and south showgrounds. A multi-modal path is also proposed to run east of and parallel to the C-4 canal to connect the north and south showgrounds. The Applicant will enhance the bridle trail along the north side of the ACME canal, along the southern boundary of The Wellington South, to create an east/west connection between the expanded showgrounds site and the existing trail on South Shore Boulevard. Residents of The Wellington South will have a 12-foot bridle trail through the community to South Shore Boulevard and the north and south showgrounds, along with golf cart access to the equestrian amenities and the south showgrounds. The Application removes the (unbuilt) vehicular east/west connection shown on the Wellington Countryplace PUD to allow for the ability to consolidate the vested dwelling units on Pod E which then facilitates the expansion of the showgrounds. Instead, the proposed connections will promote an integrated, multi-modal transportation system that enhances the equestrian lifestyle. Residents will have the ability to walk, ride, or use a golf cart to access the showgrounds and equestrian amenities throughout the site without vehicular conflict points.

An additional vehicle ingress/egress point is proposed on South Shore Boulevard to provide access to the five farms. Recognizing the nature of their access, farm residents may be using agricultural vehicles and horse trailers with slightly different needs than the access and the roads provided for the residential estate lots. The petition also proposes two additional secondary access points into the showgrounds from Gracida. The intent of the new secondary access areas are to provide additional opportunities for vehicle ingress/egress and to support the diverse components of the showgrounds. It is important to note that these proposed secondary access points will be evaluated and confirmed at final site plan approval.

The proposed project changes the traffic patterns on site by allowing two-way ingress/egress along Gene Mische Way with access to the north and south showgrounds, removing the vehicular east/west connection through the site, and adding and improving bridle and golf cart paths throughout the site to connect the residences, showgrounds, and adjacent properties. The Wellington South is intended to support and complement the showgrounds; accordingly, the residents will utilize the golf cart and bridle connections to the showgrounds and its equestrian amenities, thereby reducing external vehicular trips

on South Shore Boulevard. Creating the south showgrounds allows equestrian events previously held on surrounding properties, including dressage and showjumping competitions, to be consolidated at the expanded site. This consolidation, as well as the reallocation of the residential uses to the eastern portion of the Subject Property, provide for safer traffic circulation by reducing points of conflict that currently exist at the Pierson/South Shore Boulevard intersection due to high volumes of competitors and exhibitors crossing South Shore Boulevard.

A conceptual circulation plan is enclosed with the Application. A final circulation plan signed and sealed by a registered engineer would be provided during final site plan approval. Also enclosed is a traffic analysis prepared by Simmons & White.

Mass Transit

There are no Palm Tran routes or stops within the vicinity of the project site. The nearest bus stop would be Stop 3742 located along ring road of the Wellington Green Mall. From here, a passenger can use Route 52 to go north along State Road 7 to the Village of North Palm Beach or Route 46 to go east along Forest Hill Boulevard. A passenger could also take Route 43 to the West Palm Beach Tri-Rail station.

Housing/Population

The Subject Property is located within Census Tract 0077.59. The Wellington South currently consists of two separate land uses. Except for approximately 5 acres of Commercial property located on the northwest corner of Lake Worth Road and South Shore Boulevard, the remainder of the property has the current land use of Residential B. Since the commercial land use does not equate to population, the total dwelling units of 199 as provided for within the Wellington Countryplace PUD for the subject property would produce a population of 601 persons. The application by Applicant is seeking 197 units which would garner a population of 595.

Based on the 2020 census, the surrounding area within a 5-mile radius of the Subject Property is 85,575. Market trend is for this area to continue to grow. The Palm Beach County economic engine has historically been fueled by population growth and an increase in available discretionary income of its residents. This area of the County is no exception as most of the residents are over age 40 with high levels of discretionary income. This increase in purchasing power of the neighborhoods surrounding this site has been recognized by some of the nation's leading retailers including Apple, Whole Foods, and Trader Joe's. In February 2021, Palm Beach County luxury single-family home sales spiked 62%. Single-family homes are going under contract 60% faster as of June 2022 than in 2020. The volume of new listings of single-family homes decreased by 52.5% from 2020 to 2021 indicating home buyers are putting roots down in Palm Beach County. Please see the enclosed market study for additional information.

Environmental Inventory

The proposed property is mostly vacant. Pod G is wooded and most of Pod F and E also contain wooded areas. Part of Pod E was approved for the temporary use as a polo field, so this area is cleared. Along the northern boundary of the subject property within Pod F, there are retention lakes; however, there are no other natural sources or water. There are no known threaten or endangered species at the site. There are no petroleum or other hazardous material storage at the site. Please see the enclosed maps for additional information regarding the soil composition and the nearest location of a wellfield.

Drainage

The stormwater management system for The Wellington South will provide the water quality treatment and water quantity storage required by the South Florida Water Management District (SFWMD) and the Acme Improvement District (Acme) within the limits of the Subject Property. It is anticipated that approximately 15 acres of wet detention lakes will be provided within the development to provide the required stormwater treatment and protection with an outfall to the existing Acme C-4 canal at the southwest corner of the property. All open space and canal maintenance areas shall be graded away from the top of bank of the existing canal and proposed lakes along the property line to avoid direct discharge and comply with SFWMD and Acme design criteria.

Please see the enclosed Drainage Statement for specific information related to the proposal's impact on nearby drainage. Said Drainage Statement addresses the requirements found within Section VIII of the Future Land Use Map Amendment Application.

Water/Wastewater/Aquifer Recharge Analysis

The proposed use of the Subject Property would generate a total average daily water demand of 94,446 gallons per day (gpd) and a total average daily sewer demand of 73,420 gpd.

Please see the enclosed Water and Wastewater analysis enclosed herein with this statement which addresses the requirements of Section IX, X & XI of the Future Land Use Map amendment application.

Conservation

There are no known threaten or endangered species impacted or reasonably to be impacted by this application. As shown on the existing master plan, two preserve areas are shown: 1) 6.17 acres along the east boundary line of Mida Farms, along the southern boundary of Pod E adjacent to Gracida Street; and 2) 12.49 preserve on the eastern most side of Pod F, Phase VII adjacent to the western boundary of Mida Farms. These preserves will not be impacted and will remain in place. Notwithstanding the foregoing, through a separate process with SFWMD, Applicant is seeking the release of the 12.49-acre preserve. Until such time as this preserve is released, it will be used for uses consistent with the conservation easement, such as bridle paths, which would connect the proposed equestrian amenity (on a 5.9-acre site to the south of this preserve) to the residential development.

Recreation and Open Space

Near the subject site is the Wellington Community Park. This park consists of baseball diamonds, basketball courts, open fields, and a recreation center. The Village recently entered into an agreement to enhance this property. The nearest county regional park is located at Okeehlee Park on Forest Hill Boulevard, east of the Florida Turnpike. In addition, Calypso Bay water park, which is owned and operated by Palm Beach County is located northwest of Southern Boulevard and State Road 7 in Royal Palm Beach, Florida. It is not anticipated for the proposed land use change to have any significant impact on the recreational resources of the Village or Palm Beach County.

Fire Rescue

Palm Beach County Fire Rescue Station 27 is immediately adjacent to the subject property on South Shore Boulevard. The anticipated response time would be under a minute from departure of the station house. It is not anticipated that response time to the subject property would be impacted from this proposal. With the addition of dwelling units, the number of responses to this property would increase.

Historic Preservation

No historic or architecturally significant resources are known to exist within 500 feet of the subject property. No known archaeological resources are located within 500 feet of the subject property. Please see the enclosed letter from Palm Beach County.

Public Education

The following schools are in the immediate vicinity of the subject property:

- Elementary School – New Horizons Elementary School, 13900 Greenbriar Blvd. – 0.5 miles
- Middle School – Polo Park Middle School, 11901 Lake Worth Road – 1.6 miles
- High School – Wellington High School, 2101 Greenview Shores Boulevard – 1.4 miles

School capacity determination letter (SCAD) applications have been approved by the Palm Beach County School District. The SCAD approval letter is included within the petition for staff review.

Intergovernmental Coordination

The Village of Wellington and the ACME Improvement District are located within 1 mile of the subject property. In addition to the foregoing, the United States, the State of Florida, Palm Beach County and the South Florida Water Management District may have various jurisdictional rules, regulations or laws applicable to the Subject Property.

Future Land Use Map Amendments

As noted above, the first step to implement the vision of creating a true Equestrian Capital of the World is amending the Village's Future Land Use Map. Currently, the Subject Property's existing future land use designation consists of 282.81 acres of Residential B and 5.30 acres of Commercial. The Application proposes to change:

- 173.46 acres of Residential B and the 5.30 acres of Commercial (Pods E and G) to Residential C;
- 114.65 acres of Residential B (Pod F Phase V, VI and a portion of VII) to Equestrian Commercial Recreation;

The proposed amendments allow the addition of the south showgrounds site by reallocating the currently approved residential units to the eastern 114.65 acres of the Subject Property. The Applicant has enclosed maps which graphically depict the land use changes for the project.

Below are the specific requirements for the requested Future Land Use Map Amendments with the responses following.

General Information

1. Indicate the location of the property in relationship to the nearest north-south and east- west roadways, e.g., south side of Wellington Trace approximately one-half (1/2) mile west of Forest Hill Boulevard.

RESPONSE: The Subject Property is located at northwest corner of South Shore Boulevard and Lake Worth Road, east of Gene Mische Road.

2. Indicate whether the property has frontage on any roadway or on any waterway and, if so, the number of linear feet of frontage, as well as the depth of the property, e.g., Approximately 1,340 feet of frontage along West Forest Hill Boulevard and 5,280 feet of depth.

RESPONSE: The Subject Property has approximately 2,600 feet of frontage along Gracida Street and 2,700 feet of frontage on South Shore Boulevard.

3. Identify the location (written description and mapped) and size of any other property contiguous to the subject property which is in the same ownership, whether in whole or in part.

RESPONSE: Pod A located to the north of the northernmost Pod F parcel (PCN: 73-41-44-20-20-000-0010) is owned by the Far Niente Stables V LLC. Far Niente Stables V LLC owns two parcels within Pod F, PCN 73-41-44-20-20-000-0010 and PCN 73-41-44-20-20-000-0020.

4. Indicate the month, day and year the property was acquired and from whom the property was acquired.

RESPONSE: The Subject Property consists of 15 different parcels with 10 different owners as provided below.

Owner	PCN	Date Acquired
Far Niente Stables, LLC	73-41-44-21-11-001-0000	08/15/2005
	73-41-44-21-06-000-0010	08/23/2005
Far Niente Stables III, LLC	73-41-44-21-00-000-7020	12/23/2005
Far Niente Stables IV, LLC	73-41-44-20-20-001-0000	12/23/2005
Far Niente Stables V, LLC	73-41-44-20-20-000-0010	09/08/2020
	73-41-44-20-20-000-0020	09/08/2020
Far Niente Stables VII, LLC	73-41-44-21-00-000-3010	11/19/2007
Far Niente Stables XXV, LLC	73-41-44-20-20-000-0030	11/18/2019
	73-41-44-20-20-000-0040	11/18/2019
Far Niente Stables XXVI, LLC	73-41-44-20-20-000-0050	11/18/2019
	73-41-44-20-20-000-0060	11/18/2019
TLJ Polo, LLC	73-41-44-20-20-000-0070	11/15/2019
Wellington Showgrounds 1, LLC	73-41-44-20-20-000-0080	03/11/2022
	73-41-44-20-20-000-0090	03/11/2022
Second Wellington, Inc.	73-41-44-21-06-001-0000	11/04/1982

5. Describe the manner of acquisition (purchase, exchange, gift, inheritance, etc.), the cost of acquisition and provide evidence of same (e.g., purchase and sale agreement) and ownership (deed).

RESPONSE: Please see the table below for the cost and manner of acquisition of the 15 properties:

Owner	PCN	Manner of Acquisition/Cost
-------	-----	----------------------------

Far Niente Stables, LLC	73-41-44-21-11-001-0000 73-41-44-21-06-000-0010	Purchase \$10,000,000.00 & \$3,000,000.00
Far Niente Stables III, LLC	73-41-44-21-00-000-7020	Purchase \$8,860,812.00
Far Niente Stables IV, LLC	73-41-44-20-20-001-0000	Purchase \$23,661,434.00
Far Niente Stables V, LLC	73-41-44-20-20-000-0010 73-41-44-20-20-000-0020	Exchange with Common Ownership \$10.00
Far Niente Stables VII, LLC	73-41-44-21-00-000-3010	Purchase \$8,800,000.00
Far Niente Stables XXV, LLC	73-41-44-20-20-000-0030 73-41-44-20-20-000-0040	Purchase \$6,819,500.00 & \$5,750,000.00
Far Niente Stables XXVI, LLC	73-41-44-20-20-000-0050 73-41-44-20-20-000-0060	Purchase \$11,425,000.00
TLJ Polo, LLC	73-41-44-20-20-000-0070	Purchase \$5,375,000.00
Wellington Showgrounds 1, LLC	73-41-44-20-20-000-0080 73-41-44-20-20-000-0090	Purchase \$15,495,995.00
Second Wellington, Inc.	73-41-44-21-06-001-0000	Apart of the \$3,000,000.00 purchase with Far Niente Stables, LLC

6. Identify whether the subject property was a part of a larger property acquired from a previous owner. If so, identify the extent of any property contiguous to the subject property that was in the same ownership as the subject property.

RESPONSE: The Subject Property was not part of a larger property.

7. Indicate whether the property was previously subject to a homestead exemption, whether the property was subject to any agricultural exemptions, abatements.

RESPONSE: Upon information and belief, the Subject Property has not been subject to a homestead exemption in the past. The properties currently have an agricultural classification with the Palm Beach Property County Appraiser. There are no exemptions or abatements.

8. Identify whether the property was previously subject to a Future Land Use Map (FLUM) amendment. If so, please provide the date which the FLUM amendment application was filed; the size of the parcel; the requested change in land use designation; the recommendations of the Planning and Zoning Division, the Council; and the ultimate disposition of the FLUM amendment application (whether adopted as requested, adopted as modified, rejected, or withdrawn).

RESPONSE: The Subject Property has not been subject to a previous FLUM Amendment.

9. Has Wellington ever denied a development order for the property? If so, indicate the development order requested, the date the development order was denied, and provide a copy of the resolution denying same, if available.

RESPONSE: Wellington has not previously denied a development order for the Subject Property.

10. Has the property received development approvals from an entity other than Wellington? If the property received development approval from another local, state, or federal agency, please identify agency, type of development order granted, and indicate if the approval is still valid.

RESPONSE: With the exception of the Wellington Countryplace PUD, approved by Palm Beach County, the Subject Property has not received development approvals from an entity other than Wellington.

Consistency with the Comprehensive Plan

The Project is consistent with and furthers several provisions of the Comprehensive Plan.

Policy LU&CD 1.1.1 – Compatible with Existing Conditions – The proposal is compatible with the surrounding area. To the north, northwest, and east of the project are other single-family neighborhoods which has a variety of housing options in the form of single-family and multi-family lots. The western portions of Pod F are adjacent to other properties with the Equestrian Commercial Recreation land use.

Policy LU&CD 1.2.5 – Allow Limited Non-residential Uses within Residential PUDS/Districts – The proposed club house and equestrian buildings proposed are permissible for this project as they are designed to meet the daily needs of the residents.

Policy MB 1.2.2 – Traffic Calming – The proposed project would prevent cut-through traffic since this project would have a closed circulation system with control access for residents and visitors. Internal traffic calming strategies can be further implemented during the site plan approval process.

Policy PF 1.1.7 – Septic to Sewer Conversion - There are no septic tanks on this site. All sewer service will be via new sewer mains.

GOAL PF2 – Surface Water Management. The proposal is intended to provide surface water management systems to prevent flooding to adjacent rights-of-way or neighboring properties. Further, the project will be designed to have adequate capacity.

Policy CSR 1.1.1 – Air Quality. This project is committed to prohibit the open burning of trash and debris.

Policy CSR 1.1.2 – Transportation Air Quality Impacts. As discussed throughout this justification statement and as provided in the enclosed traffic study, this project allows for the consolidation of equestrian venues and provides for quality housing within close proximity of the showgrounds. This limits unnecessary conflicts and vehicle travel and allows for alternative modes of transportation to the showgrounds.

Compliance with Florida Law

The proposed amendment satisfies the requirements of Sections 163.3177 and 164.3180, which are the relevant provisions of Florida's Community Planning Act.

Section 163.3177

Section 163.3177, Florida Statutes, provides that any amendment must discourage the proliferation of urban sprawl. The amendment shall be determined to discourage the proliferation of urban sprawl if it incorporates a development pattern or urban form that achieves four or more of the following:

(I) Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.

RESPONSE: Consistent with subsection (I) above, the proposed project centralizes the economic growth around the existing showgrounds by seeking to expand the equestrian venues and to include complimentary housing options. Additionally, the single-family nature of the project will contribute to the tax base for the Village which provides economic benefit, as described within the Market Study by Zabik and Associates.

(II) Promotes the efficient and cost-effective provision or extension of public infrastructure and services.

RESPONSE: This project promotes the efficient and cost-effective approach to the expansion of public infrastructure as the extent of the service area for sewer services is immediately adjacent to this project. Extending sewer service is reasonable and is consistent with Policy PF 1.1.7 which prohibits septic tanks on site

(III) Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available.

RESPONSE: *With the close proximity of The Wellington South and the fact that Pod F (Phases V, VI, and VII) are expanding the existing showgrounds, the proposal is creating a compact development. Furthermore, the proposal is providing additional bridle trails, multi-modal paths, and other connectivity between the development and the showgrounds.*

(IV) Promotes conservation of water and energy.

RESPONSE: *Proximity and paramount with this development – with a consolidated venue, visitors, competitors, and other vendors do not need to commute between locations thereby reducing their energy consumption.*

(V) Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.

RESPONSE: *The compact nature of The Wellington South allows for the expansion of the showgrounds thereby increasing these equestrian agricultural activities and by freeing up land that would have otherwise been developed.*

(VI) Preserves open space and natural lands and provides for public open space and recreation needs.

RESPONSE: This proposal maintains two preserve areas within The Wellington South development. Further additional open space and bridle paths are provided within the community.

(VII) Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.

RESPONSE: The Applicant's proposal creates several benefits to the community at-large: 1) By transfer vested units on Pod F (Phases V, VI, and VII) to Pod E, this thereby frees up land which can be used to for equestrian commercial uses; 2) while expanding the showgrounds, the vested units are consolidated on Pod E to still provide the housing demanded by the market. This balance of uses is justified and creates a significant value-add to the equestrian community and Wellington overall.

(VII) Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes urban sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164.

RESPONSE: The pending applications are preventing urban sprawl and are an innovative development pattern based on the uniqueness of location and its interplay with this large equestrian venue. The Wellington South is geared towards those residents, competitors, or vendors which do or want to call Wellington their home and want the total immersion into the competitive equestrian industry.

Section 163.3180. Concurrency

The Project will satisfy concurrency standards as set forth in the Village's Comprehensive Plan, as set forth below.

Potable Water – The level of service for potable water is to maintain no less than 105 gallons per capita per day.

Sanitary Sewer – The level of service for sanitary sewer is to maintain no less than 85 gallons per capita per day.

Stormwater Management – The level of service standard for the Subject Property is the Acme Basin B Design criteria and Village of Wellington and SFWMD permit criteria wherein the project must provide the greater of 1" of water quality treatment over the drainage area, or 2.5" of water quality treatment times the percentage of imperviousness.

Transportation – The level of service is based on applicable policies and standards as documented within the enclosed traffic study.

Parks and Receptions – Policy PR 1.1.1 of the comprehensive plan inspires to have 10 acres of land for every 1,000 residents. The Village, as of 2020 has 1,281 acres of parks and recreation facilities which is over double what is needed for the village's population. The adopted levels of service is \$885 of total recreational investment per capita.

Solid Waste – According to a letter from the executive director of Solid Waste Authority of Palm Beach County, dated January 12, 2022, the landfill is forecasted to have capacity through year 2054.

Public Schools – While school concurrency is no longer a requirement per Policy CI 1.2.5, school capacity determination applications have been submitted to the Palm Beach County School district. Analysis by the school district is forthcoming and will be provided upon receipt.

Compliance with the Code

Section 5.3.3.-Comprehensive plan map/text amendments.

- A. A Comprehensive Plan Map and/or text amendments shall comply with F.S. ch. 163 and shall adhere to the submittal and review requirements of the state agency.

The proposed Future Land Use Map Amendments comply with Chapter 163 of the Florida Statutes, as detailed above, and meets the applicable submittal and review requirements.

- B. To modify the future land use map or other map in the Comprehensive Plan, the applicant shall comply with the type C submittal requirements and process as provided for in the development review manual.

Please see below.

- C. The provisions in Wellington Charter, and/or Comprehensive Plan, shall determine if a majority or super-majority vote of council is required based on the type of request and shall be approved/denied by ordinance.

A majority is required for this type of request.

LDR SECTION 5.3.3(B) REQUIREMENTS:

1. Article 5 of the Land Development Regulations provides that a FLUM amendment must be based on one or more of the following factors, and a demonstrated need. Please identify which factor is being used to justify the request for a FLUM amendment and describe how the amendment is consistent with the factor or factors.
 - a. Changed projections (e.g., regarding public service needs) in the Comprehensive Plan, including but not limited to amendments that would ensure provision of public facilities;
 - b. Changed assumptions (e.g., regarding demographic trends or land availability) in the Comprehensive Plan, including but not limited to the fact that growth in the area, in terms of the development of vacant land, new development, and the availability of public services has altered the character such that the proposed amendment is now reasonable and consistent with the land use characteristics;
 - c. Data errors, including errors in mapping, vegetative types and natural features in the Comprehensive Plan;

- d. New issues that have arisen since adoption of the Comprehensive Plan;
- e. Recognition of a need for additional detail or comprehensiveness in the Comprehensive Plan; or
- f. Data updates.

RESPONSE: The proposed future land use change is due to *changed assumptions* to the level of equestrian activities and needs for related housing within the Village. As noted above, the nature of the equestrian world has changed, impacting Wellington's place as the premier equestrian community. To maintain its place as the true Equestrian Capital of the World, it is necessary to expand the showgrounds and supporting residential in the nearby area.

- 2. Article 5 of the Land Development Regulations also provides that a FLUM amendment must be based on a demonstrated need to amend the Future Land Use Map. The demonstrated need must be supported by relevant and appropriate data and analysis, and support documents or summaries of such documents on which the need for the proposed FLUM amendment is based must be included.

- a. If the applicant is proposing an increase in residential density, the applicant should state why other density enhancement programs, such as the *Voluntary Density Bonus Program* and the *Transfer of Development Rights Program*, are not feasible for use on the subject property. The applicant **MUST** demonstrate why the current FLUM designation is no longer appropriate for this site.

RESPONSE: The proposed amendments do not result in an increase in density. The amendments relocate and reduce, by two units, the density already accommodated for.

- b. If the request is for a commercial FLUM designation, the applicant **MUST** demonstrate why additional commercial acreage is needed in this area, why *this site* is most appropriate to meet this need, and why the current FLUM designation for this site is no longer appropriate.

RESPONSE: As noted, the proposed Equestrian Commercial Recreation land use is related to the expansion of the showgrounds. This site is the only appropriate location as it is adjacent to, and connects to, the existing equestrian facility.

- 3. Identify the square feet of non-residential development that could be accommodated on the subject property with the proposed amendment.

- a. At maximum floor area ratio: This is determined by multiplying the size of the property in hundredths of an acre by the number of square feet in an acre (43,560) and by the maximum floor area ratio permitted by the Comprehensive Plan and the Land Development Regulations.

RESPONSE: Based on the maximum Equestrian Commercial Recreation FAR, the maximum square footage could be 1,988,426 SF, though that is not a feasible

possibility.

- b. At typical floor area ratio: This is determined by multiplying the size of the property in hundredths of an acre by the number of square feet in an acre (43,560) and by the typical floor area ratio permitted by the Comprehensive Plan and the Land Development Regulations.

RESPONSE: Based on the typical Equestrian Commercial Recreation FAR, the maximum square footage would be 1,988,426 SF.

4. Identify, map, and justify the trade or market area for the subject property: The following rules may be used to identify a trade/market area. If a different approach is used, you must provide a justification for the approach taken.
 - a. If a commercial small scale FLUM amendment is being requested, and if the property is more than or equal to one acre and less than or equal to three acres, using the Census Tract Map in the Appendix, draw a boundary around the property which has a radius of one and one-half miles. If the property is more than three acres and less than or equal to ten acres, draw a boundary around the property that has a radius of three miles.
 - b. If an industrial small scale FLUM amendment is being requested, and if the property is more than or equal to one acre and less than or equal to two acres, using the Census Tract Map in the Appendix, draw a boundary around the property which has a radius of one and one-half miles. If the property is more than two acres, draw a boundary around the property that has a radius of three miles.

RESPONSE: Not applicable. Applicant is seeking a large scale FLUM amendment. Notwithstanding the foregoing, please see the enclosed map.

5. For the trade or market area identified above, inventory and map the built commercial, commercial office, or industrial uses, as appropriate: This inventory should include the name of the establishment, the type of establishment by category, the square foot of built space, and the square feet of any vacancies. The map should identify where the different establishments are located in relation to the subject property.

RESPONSE: Please see the enclosed map. Bear in mind a 3-mile radius map nearly encompasses the entire village. Major commercial centers include those along SR-7, the Mall at Wellington Green and the surrounding commercial sites, the commercial plaza at Pierson Road and South Shore Blvd., the commercial plaza along South Shore Blvd. and at the intersection of South Shore Blvd. and Forest Hill Blvd, as well as the plazas at Wellington Trace and Forest Hill Blvd. and Wellington Trace and Greenview Shores Blvd.

6. A market study is required for commercial applications and many applicants find one helpful in establishing the need for additional commercial in the area. *The Market Study area shall be determined at the mandatory pre-application meeting with Planning and Zoning staff and must include the following:*
 - a. An estimate of demand using an assessment that considers per capita dollars spent in

Wellington, dollars spent per square foot of commercial space, and square foot per capita;

- b. An estimate of supply of commercial square footage which considers the request added to the current supply, and future supply;
- c. A comparison of estimated supply to estimated demand;
- d. All sources of data used in the study.

RESPONSE: Please refer to the enclosed Market Study by Zabik and Associates, Inc., which meets the determined area.

LAND USE DATA:

1. Identify any previously approved petition and resolution numbers for the subject property, if applicable. Also, please attach a copy of the previous resolution(s).

RESPONSE:

Below is a list of all previous approved petitions and resolution numbers:

- **Petition No. 76-481 / Resolution 76-481**
- **Petition No. 88-1200 / Resolution 88-1200**
- **Petition No. 97-18 / Ordinance 97-18**
- **Petition No. 99-90 / Resolution 99-90**
- **Petition No. 2011-015 / Resolution 2011-73**
- **Petition No. 2013-035**
- **Petition No. 2014-016 / Resolution 2014-37**
- **Petition No. 14-133 / Resolution 2016-01**
- **Petition No. 15-110 / Resolution 2016-03**
- **Petition No. 16-147**

2. Indicate whether the property is currently subject to a concurrency exemption or concurrency reservation. If subject to concurrency, please attach a copy of the appropriate certificate.

RESPONSE: The property is currently vested with 199 dwelling units. No other exemption or reservation applies beyond this vested right.

3. Indicate whether the property has been platted, subject to a master plan, or subdivided and indicate the record book and page number, if applicable.

RESPONSE: The subject property is a part of the Wellington CountryPlace PUD Master Plan.

4. Indicate whether the subject property is currently subject to a developers' agreement or a utility reservation.

RESPONSE: The Subject Property is not subject to a developers' agreement or a utility

reservation.

5. Indicate in which flood zone the property is located.

RESPONSE: The subject property is located within the AE and X flood zones.

6. Indicate whether the subject property is located in a wellfield protection zone.

RESPONSE: The subject property is not located in a wellfield protection zone.

7. Identify whether the property is located in a redevelopment area, neighborhood planning area, or special overlay.

RESPONSE: The subject property is located within the Equestrian Overlay Zoning District (EOZD) and Equestrian Preserve Area (EPA).

8. Explain how the proposed change in the FLUM designation of the property is compatible with the surrounding uses.

RESPONSE: As discussed above, the Subject Property is surrounded by the existing showgrounds and equestrian residential uses. The proposed uses are these same uses.

9. Describe how the proposed change in the FLUM designation of the property would be compatible with the surrounding future land uses as shown on the FLUM.

RESPONSE: A future land use designation change in Pod F, Phases V, VI & VII from Residential B to Equestrian Commercial Recreation would be consistent and compatible with the Equestrian Commercial Recreation uses to the north of the subject property. The existing residential future land use designation neighbors to Pod F already border an Equestrian Commercial Recreation parcel, indicating the proposed change is consistent and compatible based on the current approved FLUM. The future land use designation change from Residential B to Residential C would be compatible with the presently approved Residential B designation constructed on Pod F. The commercial future land use designation would be removed and replaced with a Residential C, eliminating a higher intensity use within a residential area.

10. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with* or *further*s. For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.

RESPONSE: Policy LU&CD 1.1.1 – Compatible with Existing Conditions – The proposal is compatible with the surrounding area. To the north and east of the project is the Palm Beach Polo community which has a variety of housing options in the form of single-family and multi-family lots. The portions of Palm Beach Polo adjacent to the project site are Residential C and Residential D.

Policy LU&CD 1.2.5 – Allow Limited Non-residential Uses within Residential PUDS/Districts – The proposed recreational facilities and other amenities proposed are permissible for this project as they are designed to meet the daily needs of the residents.

TRANSPORTATION

1. Determine the trip generation for the current future land use designation.
 - a. At .25 FAR; and
 - b. At .35 FAR.

RESPONSE: The existing future land use trip generation is 7,689 daily trips based on 1 DU/acre allowed for Residential B and a 0.40 FAR allowed for the Commercial.

2. Determine the trip generation for the proposed future land use designation.
 - a. At .25 FAR; and
 - b. At .35 FAR.

RESPONSE: The proposed future land use trip generation is 10,996 daily trips based on the 114.65 acre Equestrian Commercial Recreation use and the 3 DU/ac allowed for Residential C. However, the applicant is proposing to restrict the maximum future land use trip generation to 6,796 daily trips by restricting the proposed dwelling units to 200.

3. Determine the net trip increase at .25 FAR and .35 FAR (a) - (b).

RESPONSE: The change in land use will result in a decrease in 909 daily trips based on the restricted potential.

4. Determine the project trip distribution on all roadways based on the following table.

Net Trip Increase	Distance
51 - 1,000	directly accessed link
1,001 - 4,000	1 mile
4,001 - 8,000	2 miles
8,001 - 12,000	3 miles
12,001 - 20,000	4 miles
20,000 - up	5 miles

RESPONSE: The radius of influence is therefore 1 mile for the future land use analysis.

5. Determine LOS with existing traffic and project traffic.
 - a. Add the project traffic to existing traffic volumes for all roadways determined in (d.),

- based on the trip generation for the proposed future land use in (b). *
- b. Compare to LOS D for existing lanes.

RESPONSE: The LOS analysis is based on the applicable Wellington policies and standards is documented in the Traffic Study. The results demonstrate that all applicable LOS requirements are met for the long range analysis.

6. Determine LOS with projected five year traffic and project traffic.
 - a. Determine five year projected traffic volumes using the published historic growth rates and major project traffic.
 - b. Add the project traffic to all roadways determined in (d) based on the trip generation for the proposed future land use in (b). *
 - c. Compare to LOS D for existing and assured lanes.

RESPONSE: The LOS analysis is based on the applicable Wellington policies and standards is documented in the Traffic Study. The results demonstrate that all applicable LOS requirements are met for the 5-year analysis.

7. Determine the current year LOS with the increase in traffic due to the proposed land use amendment.
 - a. Add the project traffic to all roadways determined in (d) based on the trip generation for the increase in traffic due to the proposed future land use in (c).
 - b. Compare to LOS D for the lanes in the current year roadway system.

RESPONSE: The LOS analysis is based on the applicable Wellington policies and standards is documented in the Traffic Study.

8. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is consistent with or furthers. (It is recommended that the applicant review the Element for such items.) For each Objective/Policy referenced, the application must explain in detail how the individual Objective/Policy will be furthered by the proposed amendment.

RESPONSE: Policy MB 1.2.1 – Arterial/Collector Connectivity – This project would not impact the existing right-of-way of arterials or collectors adjacent to the project.

Policy MB 1.2.2 – Traffic Calming – The proposed project would prevent cut-through traffic since this project would have a closed circulation system with control access for residents and visitors. Internal traffic calming strategies can be further implemented during the site plan approval process.

MASS TRANSIT

1. Identify the mass transit provider.

RESPONSE: Palm Beach County through its transit operator, PalmTran.

2. Identify the location (street address) of the nearest bus shelter or stop, in tenths of a mile from the subject property, and the route number of the nearest bus that would service the property.

RESPONSE: There are no Palm Tran routes or stops within the vicinity of the project site. The nearest bus stop would be Stop 3742 located along ring road of the Wellington Green Mall.

3. Identify whether the subject property has connections to the Tri-County Commuter Rail.

RESPONSE: From Stop 3742, a passenger can use Route 52 to go north along State Road 7 to the Village of North Palm Beach or Route 46 to go east along Forest Hill Boulevard. A passenger could also take Route 43 to the West Palm Beach Tri-Rail station.

4. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan.

RESPONSE: This project is consistent with Policies MB 1.3.1 through 1.3.5. This project will have an effective and safe mobility network internal to the site with a private roadway system and bridle trails which connect to the adjacent Showgrounds and the development's equestrian amenity.

HOUSING/POPULATION

1. If a methodology other than that described below is used to determine population, identify the methodology and the data source(s) used to determine the affected population. Data is required to be taken from professionally accepted existing sources. Methodologies must be clearly described or referenced and must meet professionally accepted standards for such methodologies.
 - a. Current FLUM Designation: The population is calculated by multiplying the size of the property, in tenths of an acre, by the maximum permitted density under the current Future Land Use Map (FLUM) designation by the average number of persons per dwelling unit based upon the most recent population estimates generated by the U.S. Census.
 - b. Proposed FLUM Designation: The population is calculated by multiplying the size of the property, in tenths of an acre, by the average number of persons per dwelling unit based upon the most recent population estimates generated by the U.S. Census.

RESPONSE: By using the population figure provided, the existing FLUM would represent

601 persons while the proposed FLUM would represent 1,571 persons. It is important to note that Applicant is seeking to voluntarily reduce the maximum units, which would therefore reduce the population. The new population would be 595.

2. Number of dwelling units. Identify the number of dwelling units that could be constructed on the subject property based upon its:

- a. Current FLUM designation: The number of dwelling units that could be constructed equals the maximum permitted density under the property's current FLUM designation multiplied by the size of the property.

RESPONSE: The FLUM designation for the total property subject to these requirements would allow for a total of 288 units.

- b. Proposed FLUM designation: The number of dwelling units that could be constructed equals the maximum permitted density under the property's proposed FLUM designation multiplied by the size of the property.

RESPONSE: 520 units based on the proposed Residential C; however, the Applicant seeks to voluntarily reduce the maximum units to 197.

3. Census Tract data: Identify the Census Tract where the subject property is located.

RESPONSE: Census Tract 0077.59.

4. The effect of the proposed amendment on population: This is the difference between the Proposed FLUM Designation and the Current FLUM Designation

RESPONSE: Based on the proposed amendment, an additional 699 persons would be generated purely based on the FLUM designation.

5. Change in number of dwelling units: Subtract the number of dwelling units at the Current FLUM designation from the number of dwelling units at the Proposed FLUM designation.

RESPONSE: 232 units; however, the Applicant is voluntarily restricting the total number of units which would in fact result in 2 fewer units.

6. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan. To support a *residential related* proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with or furthers*. (It is recommended that the applicant review the Element for such items.) For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.

RESPONSE: Policy LU&CD 1.1.1 – Compatible with Existing Conditions – The proposal is compatible with the surrounding area. To the north is Mallet Hill, to the Northwest is Equestrian Estates, and to the east is Southfields. These other residential neighborhoods

would be consistent with The Wellington South. Further, the expanded showgrounds would be consistent with Wellington International to the north and other equestrian commercial properties to the west.

Policy LU&CD 1.2.5 – Allow Limited Non-residential Uses within Residential PUDS/Districts –
The proposed equestrian facilities and the club house proposed are permissible for this project as they are designed to meet the daily needs of the residents.

INFRASTRUCTURE: DRAINAGE

1. Identify the entity responsible for providing drainage for the subject property. Drainage providers include drainage districts, improvement districts, water control districts, and water management districts.

RESPONSE: Acme Drainage District and South Florida Water Management District.

2. Indicate in which drainage basin the subject property is located. The six main drainage basins are: 1) C-18 basin; 2) C-17 basin; 3) C-51 basin; 4) C-16 basin; 5) C-15 basin; and 6) Hillsboro Canal basin.

RESPONSE: This property is located within the Basin A of the Village's surface water management system and the SFWMD C-51 West drainage basin.

3. Identify the drainage facility that would service the subject property. Facilities include swales, ditches, canals and storm sewers.

RESPONSE: C-51, C-23B and C-4 canals.

4. Identify the level of service standard established for the subject property.

RESPONSE: The level of service standard for the Subject Property is the Acme Basin B Design criteria and Village of Wellington and SFWMD permit criteria wherein the project must provide the greater of 1" of water quality treatment over the drainage area, or 2.5" of water quality treatment times the percentage of imperviousness.

5. Identify what measures will be taken to assure that the volume, rate, timing and pollutant load of runoff based on the proposed FLUM designation of the property is similar to that which occurred based on the property's current FLUM designation. Structural techniques emphasize detention and retention of stormwater to reduce runoff rates and provide settling and filtration of pollutants. Non-structural techniques emphasize preservation or simulation of natural drainage features to promote infiltration, filtering and slowing of runoff.

RESPONSE: Applicant will adhere to the Acme Basin B requirements, and the Village of Wellington and SFWMD permit criteria. Proposed wet detention lakes will be provided for required stormwater treatment and protection which outfall to the C-4 canal. The conveyance swales will be graded away from the top of bank of existing canals and proposed lakes to avoid direct discharge. Please see the enclosed Drainage Statement prepared by Sexton Engineering Associates, Inc. for additional information.

6. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan.

RESPONSE: The Project is consistent with Policy PF 2.1.2 in that this new development does not have a net change in the storage volume or elevation for the 100-year return frequency, 5-day duration.

INFRASTRUCTURE: POTABLE WATER

1. Identify the entity that would provide potable water service to the subject property.

RESPONSE: Wellington Utility Department.

2. Identify how far, in feet, the subject property is located from a potable water line. Indicate the street where the nearest line is located.

RESPONSE: This project would obtain potable water from a water main along South Shore Blvd.

3. Identify the potable water level of service standard established by the potable water provider.

RESPONSE: The LOS for potable water is to maintain no less than 105 gallons per capita per day.

4. The effect on potable water levels of service and system needs.

- a. Current FLUM Designation: The demand for potable water based on the property's current Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in section VII.

RESPONSE: 63,105 gallons per day.

- b. Proposed FLUM Designation: The demand for potable water based on the property's proposed Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in Section VII.

RESPONSE: 162,645 gallons, but as noted, with a restriction to 197 units it would be 62,475 gallons per day.

- c. Change in water usage: This is the difference between the Proposed FLUM Designation and the Current FLUM Designation.

RESPONSE: 99,540 gallons, as previously noted, with the restriction to 197 units there will be a reduction of 630 gallons per day.

5. Consistency with the Potable Water Sub-Element. Applicant must demonstrate consistency with the Potable Water Sub-Element.

RESPONSE: The Project is consistent with Policy PF 1.1.3 and Policy PF 1.1.4 wherein this project does not exceed the projected growth demands and is consistent with the Water Supply Facilities 10-year work plan.

INFRASTRUCTURE: SANITARY SEWER

1. Identify the entity that would provide sanitary sewer service to the subject property.

RESPONSE: Wellington Utility Department would provide sewer.

2. Identify how far, in feet, the subject property is located from a sanitary sewer line. Indicate the street where the nearest line is located.

RESPONSE: A stub-out is provided to the property line of the Subject Property along South Shore Boulevard.

3. Identify the sanitary sewer level of service standard established by the potable water provider.

RESPONSE: The LOS for sanitary sewer is to maintain no less than 85 gallons per capita per day.

4. The effect on sanitary sewer levels of service and system needs.

- a. Current FLUM Designation: The demand for sanitary sewer based on the property's current Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in section VII.

RESPONSE: 51,085 gallons per day.

- b. Proposed FLUM Designation: The demand for sanitary sewer based on the property's proposed Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in section VII.

RESPONSE: 131,665 gallons, but with the noted voluntary restriction to 197 units, it would only be 50,575 gallons per day.

- c. Change in water usage: This is the difference between the Proposed FLUM Designation and the Current FLUM Designation.

RESPONSE: 80,570 gallons. However, it would be negative 510 gallons per day for sanitary sewer based on 197 units.

5. Applicant must demonstrate consistency with the Sanitary Sewer Sub-Element.

RESPONSE: Applicant is unaware of any inconsistencies to the comprehensive plan which would occur from this proposed amendment. Consistent with Policy PF 1.1.7 there are no septic tanks on this site. All sewer service will be via new sewer mains.

INFRASTRUCTURE: AQUIFER RECHARGE

1. Identify whether the property is located within a prime aquifer recharge area: If the property is located east of the conservation areas, state that the property is located within both the surficial aquifer system and the Floridian aquifer system. Identify in what zone of the surficial aquifer the property is located. This information is available from the United States Geologic Survey.

RESPONSE: Florida aquifer and Surficial aquifer.

2. Identify, generally, the percentage of the property that will be covered with an impervious surface: Use the following to estimate the percentage of impervious surfaces: i) low residential (1 to 4.99 dwelling units per acre) = 30 percent; ii) medium and high density residential (5 dwelling units per acre and above) = 65 percent; and iii) commercial, industrial and institutional = 85 percent.

RESPONSE: Based on the information above, approximately 155 acres would be impervious. However, the formula provided does not accurately reflect the estimated percentage for equestrian commercial uses. An equestrian commercial use results in far less impervious area than a traditional commercial or industrial use.

3. Applicant must demonstrate consistency with the adopted Wellington Comprehensive Plan Aquifer Recharge Sub-Element of the Conservation Element.

RESPONSE: The Project is consistent with Policy CSR 1.3.1 wherein the water resources of this project will be protected from known activities which would adversely impact the quality and quantity of public water sources.

CONSERVATION

1. If listed species are present, provide a brief discussion of measures that will be taken to avoid or minimize adverse impacts to these species or their habitat.

RESPONSE: There are no known threatened or endangered species on the property.

2. If there are no known or reported occurrences, could listed species reasonably be expected to be present based on the site-specific habitat characteristics? If yes, please provide a brief discussion.

RESPONSE: Pods G & E are partially wooded; however, it is not reasonably expected to have species listed to use this property for habitat. The canal along the western property line of Pod G is existing and man-made. No endangered or threatened species would be anticipated to be present. Please see the enclosed environmental study for additional

details.

3. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with* or *further*s. For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.

RESPONSE: GOAL PF2 – Surface Water Management. The proposal is intended to provide surface water management systems to prevent flooding to adjacent rights-of-way or neighboring properties. Further, the project will be designed to have adequate capacity.

Policy CSR 1.1.1 – Air Quality. This project is committed to prohibit the open burning of trash and debris.

Policy CSR 1.1.2 – Transportation Air Quality Impacts. As discussed throughout this justification statement and as provided in the enclosed traffic study, this project allows for the consolidation of equestrian venues and provides for quality housing within close proximity of the showgrounds. This limits unnecessary conflicts and vehicle travel and allows for alternative modes of transportation to the showgrounds.

RECREATION AND OPEN SPACE

1. Identify the following facilities that would service the property:
 - a. Regional parks – **Okeehelie Park**
 - b. District parks – **Calypso Bay Water Park**
 - c. Community parks – **Tiger Shark Cove Park, Wellington Community Park**
 - d. Open space – **This project will have open space opportunities within the neighborhood.**
2. Adopted recreation levels of service standard of \$885 of total recreational investment per capita.

RESPONSE: Acknowledged.

3. The effect of the proposed FLUM amendment on regional, district and neighborhood parks.

RESPONSE: It is not anticipated for the proposed land use change to have any significant impact to the recreational resources of the Village or Palm Beach County.

4. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with* or *further*s. For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.

RESPONSE: Policy PR 1.1.1 – Recreational Land – this policy inspires to have 10 acres of land for every 1,000 residents. This project is providing open space for equestrian activities such as riding rings and an internal bridle loop, in addition to other open space areas within the community. Furthermore, the Village as of 2020 has 1281 acres of parks and recreation facilities which is over double what is needed for the population.

FIRE RESCUE

1. Identify the fire-rescue facility that would service the subject property: Identify the station number, the street address of the facility, and the distance in tenths of a mile of the facility from the subject property.

RESPONSE: Palm Beach County Fire Rescue Station 27, 3411 S. Shore Blvd., Wellington, FL. This station shares a property line with the subject property.

2. Identify the response times from the fire-rescue station to the subject property: The response time, in minutes, may be determined by multiplying the number of miles from the station to the property by two.

RESPONSE: Response time would be anticipated to take approximately one minute.

3. The effect of the proposed FLUM amendment on the average emergency response time: If the response time is less than five minutes, there is a rebuttable presumption that there would be no negative effects on fire-rescue response time. If the response time is greater than five minutes, please identify what actions could be taken to mitigate the Fire-Rescue Department's response time.

RESPONSE: It is not anticipated that response time to the Subject Property would be impacted from this proposal.

HISTORIC PRESERVATION

1. Identify any historic or architecturally significant resources within 500 feet of the subject property. Historic or architecturally significant resources include buildings, structures and other objects.

RESPONSE: No historic or architecturally significant resources are known to exist within 500 feet of the subject property. Please see the enclosed letter from Palm Beach County.

2. Identify any archaeological resources located within 500 feet of the subject property. Archaeological resources include aboriginal mounds, forts, earthworks, village locations, camp sites, middens, burial mounds, missions, or other artifacts at least seventy-five years old.

RESPONSE: No known archaeological resources are located within 500 feet of the subject property. Please see the enclosed letter from Palm Beach County.

PUBLIC EDUCATION

1. Identify the name and street address of the public schools that would educate potential school age children, and indicate how far the school is from the subject property, for:

- a. Elementary Schools – **New Horizons Elementary School, 13900 Greenbriar Blvd. – 0.5 miles**
 - b. Middle Schools – **Polo Park Middle School, 11901 Lake Worth Road – 1.6 miles**
 - c. Senior High Schools – **Wellington High School, 2101 Greenview Shores Boulevard – 1.4 miles**
2. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with* or *further*s. For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.

RESPONSE: While school concurrency is not a requirement per Policy CI 1.2.5, the request is consistent with Policy CP 1.4.1, as Applicant will coordinate with PBC School District relating to the potential impact of this proposal, if necessary. Additionally, this project provides interconnectivity with the existing bridle paths, sidewalks, and multi-modal paths consistent with the intent of Policy PF 4.1.2.

INTERGOVERNMENTAL COORDINATION

1. Identify all local governments (including special districts) located within one-mile of the subject property.

RESPONSE: ACME Improvement District, Village of Wellington, United States, State of Florida, South Florida Water Management District.

2. Indicate whether or not a municipality has initiated annexation of the property. If annexation was attempted by a city, indicate when and the name of the city. In addition, identify whether the subject property is located within the future annexation area of any local government.

RESPONSE: The Subject Property is not subject to annexation and is not in the future annexation area of any other local government.

3. Applicant must demonstrate the impact of the proposed amendment on the Intergovernmental Coordination Element.

RESPONSE: This proposal will have no impact on this element of the comprehensive plan as this project will not impact any existing interlocal agreements nor will it adversely impact levels of services inside or outside the municipal boundaries of Wellington.

EQUESTRIAN ELEMENT

1. Applicant must demonstrate the impact of the proposed amendment on the Equestrian Element.

RESPONSE: As noted above, the proposed amendments meet the purpose of the Equestrian Element by providing for an enhancement of Wellington as the premier Equestrian Community, now and for the future.

Master Plan Amendment

Applicant is seeking to consolidate Pods E, Pod G, and a portion of Pod F into a newly formed pod. This master plan amendment would also show the revised vehicular and multi-modal circulation around the impacted pods and to provide for the density and intensity associate with each respective pod. In addition, Applicant is seeking revisions to the conditions of approval as set forth in a separate document.

Specifically, Applicant is seeking the newly formed pod would conceptually provide for 148 single family residences with another 49 dwelling units to be vested for banking purposes. Also, as part of this amendment, Applicant is seeking revised development standards, as provided for in the Project Standards Manual enclosed herein. A substantial buildout of the adjacent equestrian venue (as discussed below) will be adding substantial stabling which is a critical source of income to finance the comprehensive improvements associated with these requests. The co-applicants agree that the critical path is to create a robust pipeline of new customers and as it is seen throughout the Village, there is a significant deficiency in available housing options. While Applicant is seeking flexibility relating to lot sizes, specifically a minimum lot size of 0.25 acres, it is important to note that all lots exceed 0.25 acres, many lots exceed 0.5 acres and five “farm” lots exceed a 4-acres which is unlike the Equestrian Club Estates neighborhood. Additionally, it is important to note that The Wellington South provides flexibility with the ability for purchasers to combine multiple lots totally up to 2 acres in size. Within Equestrian Club Estates, the vast majority of lots along Calypso Lane and Stroller Way are between 0.18 to 0.21 acres, and those lots along Ambassador Road are just over ½ acre. The residents of Equestrian Club Estates were drawn to the proximity of the Showgrounds where a large majority of those residents actively compete at the horse shows and primarily use golf carts for transportation. The Wellington South project will be similar in its draw directly to those who actively compete; however, with lots, as referenced above, which will be on average larger.

Pod F, Phases V, VI, and the remaining portion of Phase VII will be used as an equestrian venue. The program for this venue will have up to 1,500 stalls at full buildout, 9 competition rings with schooling areas, an international equestrian stadium with schooling area capable of seating up to 7,000 spectators, a derby field with schooling area, lunging rings and schooling areas, hospitality facility for up to 4,000 spectators, up to 26,000 square feet of retail space to support this equestrian venue, 18,000 square feet of office space, and up to 45,000 square feet of storage, warehouse, and maintenance space. This proposed equestrian venue will be an economic driver for the Village and with these additional uses, there will be a significant need for the housing to support its operations as discussed above.

General Information per the Master Plan Amendment Application.

1. That the proposed request is consistent with the purposes, goals, objectives, and policies of the Comprehensive Plan.

RESPONSE: The proposal is consistent with the purposes, goals, objectives, and policies of the comprehensive plan as discussed throughout this justification statement.

2. That the proposed request is in compliance with all articles of the Land Development Regulations (LDR).

RESPONSE: The proposal is consistent with all articles of the LDR as discussed in detail below.

3. That the proposed request minimizes environmental impacts, including but not limited to water, air, stormwater management, wildlife, vegetation, wetlands, and the natural functioning of the environment.

RESPONSE: The proposal will not impact water on the site, but instead this project would result in an increase in water surface area. This project will not impact air rights or quality. Please see the enclosed drainage statement regarding stormwater management. This is a mostly vacant site which is used as an equestrian venue. Please see the enclosed environmental study for additional details relating to wildlife, native vegetation, wetlands or any natural functioning environment on site.

4. Provide the overall design concept and show that the design of the proposed request minimizes adverse effects, including visual impact and intensity of the proposed use on adjacent lands.

RESPONSE: Enclosed herein with this statement is a conceptual site plan which shows the overall design of the property. Necessary landscape buffers would be provided to buffer the neighborhood from the surrounding rights-of-way and other neighborhoods.

5. That the proposed request is consistent with applicable neighborhood plans.

6. **RESPONSE: This property is not subject to any neighborhood plans.**

7. That the proposed request will result in a logical, timely and orderly development pattern.

RESPONSE: This is a logical location for a neighborhood. Moreover, this infill project prevents urban sprawl.

8. That the proposed request complies with Wellington building standards.

RESPONSE: This project will comply with applicable building standards.

Compliance with Code

Section 5.3.5.-Master plan

Master plans and/or amendments to existing master plans shall comply with the type C submittal requirements and process of the development review manual and shall be done by resolution. Additionally, the following shall apply:

- A. No permits for development shall be issued prior to the approval of the master plan/amendment and the corresponding site plan/amendment or subdivision plan(s).
- B. A conceptual site plan or subdivision plan is required as part of the application for a master plan/amendment.

A conceptual site plan has been provided with this Application.

- C. If the project is intended to be constructed in phases, the applicant must submit a phasing plan as part of the required documents. This is necessary to ensure appropriate development patterns and to apply time limitations as set forth in Section 5.2.4 related to site plans/subdivision plans.
- D. Master plans are required for all planned developments and may be required for multiple parcels that are intended to function as a single project but are not a designated planned development.
- E. Master plan amendments shall be reviewed by village council as a type C application unless the modifications to the master plan qualify as a minor amendment pursuant to the development review manual (no increase in density and/or intensity), then an administrative approval, approval with conditions, or denial may be granted in accordance with a type A2 application.

Article 6, Chapter 5 – Planned Developments

The proposed master plan amendment is compliant with this chapter of the LDRs. The purpose of a Planned Development District (“PDD”) (i.e. the Wellington Countryplace PUD), is to allow flexibility in the application of zoning regulations for the development of land within a PDD that achieves distinctive, attractive communities, takes advantage of compact building design, and preserves open space and critical natural environments by allowing flexibility from zoning regulations.

The proposed development is consistent with the intent of a PDD as while existing Wellington Countryplace PUD is existing, the proposed amendment increases the availability of multi-modal pathways and increases private amenities for those living in the neighborhood, but also increases the open-to-public amenity of the future expansion of the showgrounds. Moreover, this provides for the efficient use of the land and provides for the efficient circulation and internal trip capture as it is anticipated those living in the neighborhood are those which are actively participating in the equestrian industry. Furthermore, the design of the proposed neighborhood will maintain adequate stormwater runoff and will be of a distinctive design yet remaining compatible with the overall area.

Consistent with Section 6.5.2(D), available density within the PUD is being transferred between the Pods, and such transfer is not increasing the available density, but in fact, is being reduced by 2 units. This transfer is being accommodated by the proposed master plan amendment consistent with the procedures found in Article 5 of the LDR.

Compliance with Article 7 – Site Development Standards

Off-Street Parking – The proposed parking for the residential uses and amenities will be in compliance with Table 7.5-1

Landscaping and Buffering – The proposed development adheres to the purposes outlined in Article 7, Chapter 8 relating to the Village’s landscape code requirements by providing for the required landscape buffers, foundation plantings, and other specific landscape requirements as provided within the code. Please refer to the Project Standards Manual for landscape specifics.

Driveways and Access – The proposed development adheres to requirements as established within Section 7.4.1 and 7.4.2 to promote the safe and efficient traffic movement while affording

reasonable access to abutting land.

Compliance with Article 8 – Subdivision, Platting and Physical Improvements

The proposal adheres to the policies outlined in Article 8 of the LDR, which outlines subdivision, platting and physical improvements within the planned development.

Conclusion

The proposed future land use map amendment and master plan amendment are intended to effectuate the vision of making Wellington the Equestrian Capital of the World. The consolidation of equestrian venues, the provision of quality housing near these important venues, and the mitigation of traffic issues for all Wellington residents further solidifies the future of a prosperous equestrian industry in the Village.