Memorandum

DATE: October 3, 2023

FROM: Juan S. Calderon, PE, PTOE, Project Manager

TO: Henry B. Handler, Esq.

THE LAW OFFICES OF WEISS, HANDLER & CORNWELL, P.A.

One Boca Place
2255 Glades Road, Suite 205-East
Boca Raton, FL 33431-7392

SUBJECT: The Wellington North & South – Traffic Review

CALTRAN Engineering Group, Inc. (CALTRAN) was retained by your office to evaluate the adequacy of the Traffic Impact Statement (TIS) prepared for the proposed Wellington North and South development prepared by Simmons & White dated May 8, 2023 and November 8, 2022, respectively.

Wellington North

The development is planned to be located on the northeast corner of South Shore Boulevard and Pierson Road in the Village of Wellington Florida.

The site for the proposed development comprises 101.74 acres that includes the Coach House (aka The Player's Club), which is an approved unbuilt residential project, the polo fields at White Birch, and the current Equestrian Village that hosts dressage, jumper derbies, grand prix events, horse exhibitions, and equestrian clinics.

It is proposed to redevelop the 101.74 acres with a residential community of 300 dwelling units with ancillary recreational facilities that include a 10-hole golf course and a multisport complex that are intended to be available for the Wellington North and South developments.

Wellington South

The development is planned to be located on the northwest corner of South Shore Boulevard and Lake Worth Road/40th Street in the Village of Wellington Florida. The site for the proposed development comprises 288.11 acres that are currently vacant and it is

proposed to develop the site with 173.46 acres of Residential C that allows three dwelling units per acre and an Equestrian Recreational facility of 114.65 acres.

Although the Wellington South is a separated proposed development a combined application is proposed to the Village of Wellington.

The Traffic Impact Statement for the Wellington North conducted by Simmons & White concluded the following: *"The proposed redevelopment will result in a decrease in trips for the proposed change in future land use based on the restricted maximum potential. The Master Plan will also result in a reduction of trips from the vested use. Therefore, the proposed project meets the Traffic Performance Standards of both Palm Beach County and the Village of Wellington."*

Similarly, the Traffic Impact Statement for the Wellington South concluded the following: *"A review of the impacted roadway segments and intersections reveal that the proposed development meets the requirements of the Village of Wellington Traffic Performance Standards with the intersection improvements identified within this report."*

Based on our assessment, the Traffic Impact Statements prepared for the proposed Wellington North and South developments do not meet Palm Beach County Traffic Performance Standards (TPS).

In addition, the proposed developments traffic analysis presents a concerning issue for residents and neighbors of the area due the development's traffic impacts to the surrounding transportation network. Consequently, this memorandum evaluates the adequacy of the proposed developments and to serve as peer review to the mentioned TIS reports.

As part of this effort all information and data collected or used by Simmons & White such as existing traffic data, growth rate, trip generation, distribution, and capacity analysis results were reviewed. The comments and concerns are highlighted in this memorandum.

This peer review concludes that the following aspects should be re-visited as part of the applicant TIS and the Village of Wellington's review process due to:

- Adequacy of traffic data
- Applicability of trip generation rates/equations and assumptions
- Accuracy of growth rate calculations, trip distribution, and trip assignment
- Efficiency of proposed improvements
- Undermining traffic impacts and project significance

1. BACKGROUND

Wellington North

The proposed development is planned to be located on the northeast corner of South Shore Boulevard and Pierson Road in the Village of Wellington, Florida. The site consists of 101.74 acres that includes the Coach House (Player's Club), which is an approved unbuilt residential development, the polo fields at White Birch, currently closed, and the Equestrian Village.

In 2019, comprehensive and master plan amendments were approved for the Coach House, a 5.58-acre property for Residential F land use that allows a maximum of 12 dwelling units per acre. To date, the demolition of the Player's Club building is the only activity that has been completed.

Currently, the site is **only** occupied by the Equestrian Village, an Equestrian Recreational facility that hosts dressage, jumper derbies, grand prix events, horse exhibitions, and equestrian clinics.

The Equestrian Village consist of the following:

Existing development:

- 352 stables, Exhibitor – 25 Trailers, Event – 500 spectators, and Staff – 30 officials

The proposed development will consist of following land uses and intensities:

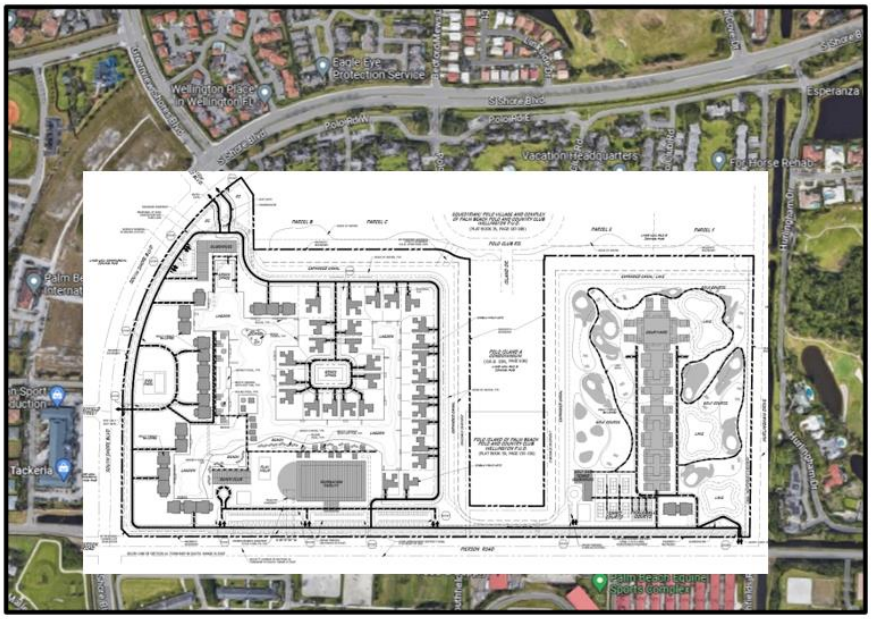
Proposed development:

- 300 Residential
  The latest application shows 250 dwelling units - 22 single family, 28 single family attached, and 200 multi-family condo. 50 units are invested in the Coach House property which is not a part of the new application but still results in 300 units
- Golf Course – 10 holes
- Multisport complex – 79,924 square feet

CALTRAN is also aware that this project is being revised regarding a reduction in number of units as part of the last submitted information.

Figure 1 shows the location of the project site, the existing, and proposed land uses.

Existing Site



Proposed Development

Figure 1. Wellington North Existing and Proposed Development

Wellington South

The proposed development is planned to be located on the northwest corner of South Shore Boulevard and Lake Worth Road/40th Street in the Village of Wellington Florida. The site consists of 288.11 acres of vacant land.

The land use designation of the vacant land is described as follows:

- 5.30 Acres (92,347 sf) of Commercial land use
- 282.81 Acres of Residential B (allows one dwelling unit per acre).

The proposed development will consist of the following land uses and intensities:

Proposed development:

- 197 single family dwelling units (173.46 Acres)
  The latest application shows 114 single family = 5 - four-acre farms and 109 half acre lots (Parcel E) Reserve units have been dropped out of the PUD
- Equestrian Recreational Facility and Expansion of the Wellington International Equestrian Center - 114.65 Acres (5,000 attendees' weekday & 7,000 attendee's Saturday)

  The planned expansion of the Wellington International Equestrian Center will consist of up to 1,500 equestrian stalls, 9 competition rings with schooling areas, an international equestrian stadium with schooling area, derby field with schooling area, and lunging rings with schooling areas. However, the conceptual design site plan does not provide details for POD F.

CALTRAN is also aware that this project is being revised regarding a reduction in number of units as part of the last submitted information.

Figure 2, on the following page, shows the location of the project site, the existing, and proposed land uses.

Existing Site

Proposed Development

Figure 2. Wellington South Existing and Proposed Development

2. ADEQUACY ASSESSMENT

2.1 TRAFFIC DATA

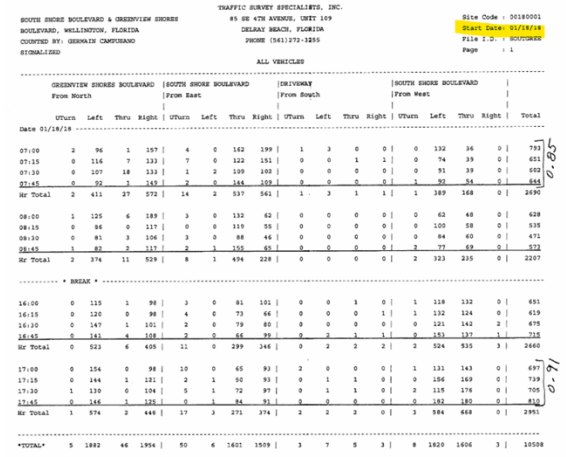
Traffic Peak Season (Wellington North): Traffic peak season in the area is associated with special events held by the existing equestrian facilities. The Global Dressage Festival runs from January to March every year. This topic applies to both developments.

Traffic Peak Season (Wellington South): Traffic peak season in the area is associated with special events held by the Palm Beach International Equestrian Center (PBIEC). This facility hosts hunter/jumper horse shows year around. However, the busiest event is the Winter Equestrian Festival that runs from January to April.

A major issue associated with the traffic data used in both TIS reports was identified. Peak Hour Traffic counts used in the analyses do not meet Article 12 of the Palm Beach County Traffic Performance Standards – Chapter C, Section 1, C – Traffic Volume Components. Page 23 reads:

> Peak Hour Traffic, two-way and directional shall be counted by PBC during the Peak Season as defined in this Article. Where current data (collected no more than *30 months* prior to submittal of the Traffic Impact Study) are not available the Project shall conduct counts or upon approval by the County Engineer may establish the Peak Hour Traffic using approved K and D factors. [Ord. 2007-013].

As shown in the images below, traffic counts use in the reports were collected in January 2018 and the first draft of the report was submitted on July 21,2022. This indicates that counts were collected 53 months before the first draft of the report was submitted. Thus, traffic data used in the report is outdated and does not comply with the 30 months requirement established by Palm Beach County TPS.



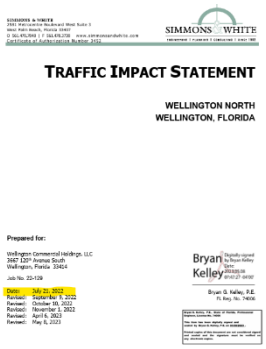
TRAFFIC SURVEY SPECIALISTS, INC.
#5 SE 4TH AVENUE, UNIT 109
DELRAY BEACH, FLORIDA
PHONE (561)272-3255

SOUTH SHORE BOULEVARD & GREENVIEW SHORES
BOULEVARD, WELLINGTON, FLORIDA
COUNTED BY: GERMAIN CAMPUSANO
SIGNALIZED

Site Code : 00180001
Start Date: 01/18/18
File I.D. : SOUTHSHR
Page : 1

ALL VEHICLES

	GREENVIEW SHORES BOULEVARD From North				SOUTH SHORE BOULEVARD From East				DRIVEWAY From South				SOUTH SHORE BOULEVARD From West				
	UTurn	Left	Thru	Right	UTurn	Left	Thru	Right	UTurn	Left	Thru	Right	UTurn	Left	Thru	Right	Total
Date 01/18/18																	
07:00	2	96	1	157	4	0	162	199	1	3	0	0	0	132	36	0	793
07:15	0	116	7	133	7	0	122	151	0	0	1	1	0	74	39	0	651
07:30	0	107	18	133	1	2	109	102	0	0	0	0	0	91	39	0	603
07:45	0	92	1	143	2	0	144	109	0	0	0	0	1	93	54	0	645
Hr Total	2	411	27	572	14	2	537	561	1	3	1	1	1	389	168	0	2695
08:00	1	125	6	189	3	0	132	62	0	0	0	0	0	62	48	0	628
08:15	0	86	0	117	0	0	119	55	0	0	0	0	0	100	58	0	535
08:30	0	81	3	106	3	0	88	46	0	0	0	0	0	84	60	0	471
08:45	1	82	2	117	2	1	155	45	0	0	0	0	2	77	69	0	573
Hr Total	2	374	11	529	8	1	494	228	0	0	0	0	2	323	235	0	2207
------- * BREAK * -------																	
16:00	0	115	1	98	3	0	81	101	0	0	1	0	1	118	132	0	651
16:15	0	120	0	98	4	0	73	66	0	0	0	1	1	132	124	0	619
16:30	0	147	1	101	2	0	79	80	0	0	0	0	0	121	142	2	675
16:45	0	141	4	108	2	0	66	99	0	2	1	1	0	153	137	1	715
Hr Total	0	523	6	405	11	0	299	346	0	2	2	2	2	524	535	3	2660
17:00	0	154	0	98	10	0	65	93	2	0	0	0	1	131	143	0	697
17:15	0	144	1	121	2	1	90	93	0	1	1	0	0	156	169	0	739
17:30	1	139	0	104	5	1	72	97	0	1	1	0	2	115	176	0	705
17:45	0	146	1	125	0	1	84	91	0	0	0	0	0	182	180	0	810
Hr Total	1	574	2	448	17	3	271	374	2	2	2	0	3	584	668	0	2951
TOTAL	5	1882	46	1954	50	6	1601	1509	3	7	5	3	8	1820	1606	3	10508



SIMMONS & WHITE

TRAFFIC IMPACT STATEMENT

WELLINGTON NORTH
WELLINGTON, FLORIDA

Prepared for:
Wellington Commercial Holdings, LLC
3667 120th Avenue South
Wellington, Florida 33414

Job No. 22-139

Date: July 21, 2022
Revised: September 9, 2022
Revised: October 10, 2022
Revised: November 1, 2022
Revised: April 6, 2023
Revised: May 8, 2023

Bryan Kelley

Bryan G. Kelley, P.E.
FL Reg. No. 74606

SIMMONS & WHITE

TRAFFIC IMPACT STATEMENT

EQUESTRIAN VILLAGE ESTATES
WELLINGTON, FLORIDA

Prepared for:
Wellington Commercial Holdings, LLC
3667 120th Avenue South
Wellington, Florida 33414

Job No. 22-130

Date: July 21, 2022
Revised: September 9, 2022
Revised: October 10, 2022
Revised: November 1, 2022
Revised: November 18, 2022

Bryan G. Kelley, P.E.
FL Reg. No. 74606

Although intersection turning movement counts collected by Palm Beach County Traffic Division (PBCTD) after March 11, 2020 and 2021 are available, it is advised by the County *not to use* those counts in traffic impact studies since the counts may have COVID-related travel disruption impacts. Thus, PBCTD counts cannot be used.

Since all capacity analyses were conducted using outdated data, the analysis results are not accurate and should not be accepted. The applicant had enough time to gather more current traffic data considering the relevance of this project.

2.2 TRIP GENERATION

The trip generation calculations do not comply with Article 12 of the Palm Beach County Traffic Performance Standards - Chapter C, Section 1, C – Traffic Volume Components, 2. Trip Generation. Page 23 reads:

> *Traffic generated by the Project shall be computed in the following manner:*
>
> *a. Rates to estimate daily and peak hour trips generated from the Project, trip rates published on the PBC Traffic Engineering website shall be used. If the use in the proposed Project is not listed in the PBC Traffic Engineering website Trip Generation tables, then the latest available Trip Generation Manual published by the Institute of Transportation Engineers (ITE) shall be used.*
> *A prior consultation with the County Traffic Engineer is required before using trip rates, other than that published on the PBC Traffic Engineering website. If the Applicant feels that any other method to estimate trips would provide more realistic trip estimate for the proposed Project, prior consultation and approval from the County Engineer is required. [Ord. 2014-025].*

Wellington North

As noted in Tables 1, 2 and 3 of the TIS report ITE Land use code 411 (Public Park) and ITE Land use code 435 (Multipurpose Recreational facility) were used in the trip generation calculations. In addition, it is noted at the end of Table 3 calculations for the AM Peak hour trips associated with the Multipurpose Recreational facility were based on a Trip Generation Study conducted from a Boomers facility, which is an indoor arcade entertainment establishment.

These land uses are inappropriate because they do not realistically reflect the actual purpose of the existing land use. The existing land use is an Equestrian Recreational Facility where horse competition/exhibition activities or events are held, which deviates significantly from the land uses selected to describe existing conditions as noted below for which those land uses do not present correlation to equestrian facilities or events. Excerpts from the ITE Trip generation handbook are presented below.

Land Use: 435
Multipurpose Recreational Facility

Description

A multipurpose recreational facility contains two or more of the following land uses combined at one site: miniature golf, batting cages, video arcade, bumper boats, go-carts, and golf driving range. A refreshment area may also be provided. Golf course (Land Use 430), miniature golf course (Land Use 431), golf driving range (Land Use 432), batting cages (Land Use 433), rock climbing gym (Land Use 434), and trampoline park (Land Use 436) are related uses.

Land Use: 411
Public Park

Description

A public park is owned and operated by a municipal, county, state, or federal agency. The parks surveyed vary widely as to location, type, and number of facilities, including boating or swimming facilities, beaches, hiking trails, ball fields, soccer fields, campsites, and picnic facilities. Seasonal use of the individual sites differs widely as a result of the varying facilities and local conditions, such as weather. For example, some of the sites are used primarily for boating or swimming; others are used for softball games. Soccer complex (Land Use 488) is a related use.

As shown above horse-related activities are not mentioned in the description for Land Use codes 435 and 411. In contrast, the description for Land Use 452 – Horse Racetrack indicates that the facility includes spectator seating, areas for refreshment, horse stables, and sometimes housing for workers. These activities are more in alignment with the existing land use. Please see reference to the image below for more details.

Land Use: 452
Horse Racetrack

Description

A horse racetrack is a facility that is built for the racing of horses. It includes a long broad track, typically between rails and with marked starting and finishing points. The facility includes spectator seating, an area for food and refreshments, horse stables, and sometimes housing for workers.

The image on the next page, shows the trip generation calculations summarized in Tables 1 through 3 of the TIS report and highlights the incorrect land use designations applied in the trip generation calculations for existing conditions.

WELLINGTON NORTH

07/21/2022
Revised: 08/02/2022
Revised: 10/10/2022
Revised: 11/01/2022
Revised: 04/03/2023
Revised: 05/07/2023

EXISTING FUTURE LAND USE DESIGNATION (EQUESTRIAN COMMERCIAL AND RESIDENTIAL F)

TABLE 1 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	67	Dwelling Units	6.74			452	10.0%	45	407	0%	0	407
Public Park	411	72.13	Acres	0.78			56	0.0%	0	56	0%	0	56
Multipurpose Recreational Facilities	435	104,729	S.F.	42.17			4,416	1.0%	45	4,371	0%	0	4,371
		Grand Totals:					4,924	1.8%	90	4,834	0%	0	4,834

TABLE 2 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	67	Dwelling Units	0.4	0.24	0.76	6	21	27	10.0%	1	2	3	5	19	24	0%	0	5	19	24
Public Park	411	72.13	Acres	0.02	0.59	0.41	1	0	1	0.0%	0	0	0	1	0	1	0%	0	1	0	1
Multipurpose Recreational Facilities	435	104,729	S.F.	0.52	0.50	0.50	27	27	54	5.6%	2	1	3	25	26	51	0%	0	25	26	51
		Grand Totals:					34	48	82	7.3%	3	3	6	31	45	76	0%	0	31	45	76

TABLE 3 - PM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	67	Dwelling Units	0.51	0.63	0.37	21	13	34	10.0%	2	1	3	19	12	31	0%	0	19	12	31
Public Park	411	72.13	Acres	0.11	0.55	0.45	4	4	8	0.0%	0	0	0	4	4	8	0%	0	4	4	8
Multipurpose Recreational Facilities	435	104,729	S.F.	3.58	0.55	0.45	206	169	375	0.8%	1	2	3	205	167	372	0%	0	205	167	372
		Grand Totals:					231	186	417	1.4%	3	3	6	228	183	411	0%	0	228	183	411

Notes:
Internal capture based on 10% of residential trips and balancing the multipurpose recreational trips
ITE 435 Daily and AM calculations based on a Boomers trip generation study that calculated the trips per acre. Using the current ITE 435 PM trip generation rate of 3.58, the daily and AM rates were able to be dete

	Boomers Per Acre	Per 1000 SF
ITE Code 435		
Daily	103.9	103.9/8.82 x 3.58 = 42.17
AM	1.27	1.27/8.82 x 3.58 = 0.52
PM	8.82	3.58

X:\Documents\PROJECTS\2022\22-129 Equestrian Village Lagoon\Equestrian Village Lagoon Traffic Report.04.20.23.xlsx
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SIMMONS & WHITE

The trip generation analysis for Wellington North includes assumptions with no other purpose than to reduce the estimated intensities in number of gross trips for future conditions. These assumptions are speculative without analytical support documented. The assumptions are as follow:

- The golf course and sports complex are not open to the public and will only be available for residents of Wellington North and South. The golf course and recreational facility center rates are reduced by 50% and 25% to account for employees, very limited club members from outside Wellington North and Wellington South, and Wellington South residential trips.

PROPOSED FUTURE LAND USE DESIGNATION (RESIDENTIAL F) - RESTRICTED POTENTIAL

TABLE 7 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Single Family Detached	210	22	Dwelling Units	10			220	0.0%	0	220	0%	0	220
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	278	Dwelling Units	6.74			1,874	0.0%	0	1,874	0%	0	1,874
Golf Course	430	18	Holes	30.38 x 50%			273	0.0%	0	273	0%	0	273
Recreational Community Center	495	149,536	S.F.	28.82 x 25%			1,077	0.0%	0	1,077	0%	0	1,077
		Grand Totals:					3,444	0.0%	0	3,444	0%	0	3,444

TABLE 8 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	22	Dwelling Units	0.7	0.26	0.74	4	11	15	0.0%	0	0	0	4	11	15	0%	0	4	11	15
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	278	Dwelling Units	0.4	0.24	0.76	27	84	111	0.0%	0	0	0	27	84	111	0%	0	27	84	111
Golf Course	430	18	Holes	1.76 x 50%	0.79	0.21	13	3	16	0.0%	0	0	0	13	3	16	0%	0	13	3	16
Recreational Community Center	495	149,536	S.F.	1.91 x 25%	0.66	0.34	47	24	71	0.0%	0	0	0	47	24	71	0%	0	47	24	71
		Grand Totals:					91	122	213	0.0%	0	0	0	91	122	213	0%	0	91	122	213

TABLE 9 - PM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	22	Dwelling Units	0.94	0.63	0.37	15	9	24	0.0%	0	0	0	15	9	24	0%	0	15	9	24
Multifamily Low-Rise Housing up to 3 story (Apartment/Condo/TH)	220	278	Dwelling Units	0.51	0.63	0.37	89	53	142	0.0%	0	0	0	89	53	142	0%	0	89	53	142
Golf Course	430	18	Holes	2.91 x 50%	0.53	0.47	14	12	26	0.0%	0	0	0	14	12	26	0%	0	14	12	26
Recreational Community Center	495	149,536	S.F.	2.50 x 25%	0.47	0.53	44	49	93	0.0%	0	0	0	44	49	93	0%	0	44	49	93
		Grand Totals:					162	123	285	0.0%	0	0	0	162	123	285	0%	0	162	123	285

Notes:

The golf course and sports complex are not open to the public and will only be available for residents of Wellington North and South. The golf course and recreational community center rates are provided with a reduction factor of 50% and 25%, respectively to account for employees, very limited club members from outside Wellington North and Wellington South, and Wellington South residential trips.
Recreational Community Center square footage calculated as total site amenities minus the golf clubhouse and main clubhouse as they are ancillary to the overall use. (191,536 SF - 24,000 SF (main clubhouse) - 18,000 SF (golf clubhouse) = 149,536 SF

A Trip generation comparison was performed between the trip generation calculations approach from the Simmons & White TIS report and trip generation rates using two approaches as follows:

The first approach was to calculate the trip generation based on a land use that is correlated to equestrian activities (Horse Racetrack - LUC 452) - Peer Review Approach 1.

The second approach was to calculate the trip generation using the rates obtained from the Equestrian Village Traffic Study conducted by MTP Group, dated August 22, 2013 – Peer Review Approach 2.

It is important to mention that the MTP Group traffic study was prepared in 2013 for the approval of the current Equestrian Village Development, which is the subject site. Below is an image of the trip generation results from the MTP Traffic Study.

Existing Trip Generation - From Equestrian Village Traffic Study by MTP Group dated 8/22/2013

Land Use	Amount	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Stables	352	732	56	26	30	43	16	27
Exhibitor - Trailer	25	50	5	5	0	5	0	5
Event Spectators	500	666	133	113	20	133	20	113
Staff - Officials	30	75	24	22	2	24	2	22
Net Traffic		*1,523*	*218*	*166*	*52*	*205*	*38*	*167*

Trip Generation Rates

Land Use	ITE Code	Daily Trip Gen.	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Stables	PBC	2.079	0.16	47%	53%	0.123	38%	62%
Exhibitor - Trailer	Assumed	2.000	0.20	90%	10%	0.20	10%	90%
Event Spectators	*	1.332	0.27	85%	15%	0.27	15%	85%
Staff - Officials	Assumed	2.500	0.80	90%	10%	0.80	10%	90%

* Trip Generation for Events

Spectators on typical day:	500
Vehicle occupancy:	1.5
Total vehicles:	333
Total Traffic:	666
Daily Trip Gen. Rate:	1.332
AM Peak Hour:	20% of daily
Directional Split In-Out:	85% - 15%
PM Peak Hour:	20% of daily
Directional Split In-Out:	15% - 85%

Independent Variable:

Stable: Stalls

Results of the trip generation comparison are summarized in the table below.

Trip Generation Comparison - Maximum Potential Development Plan (Wellington North)

TRIP GENERATION COMPARISON BETWEEN S&W STUDY AND PEER REVIEW APPROACH 1 AT MAXIMUM POTENTIAL										
	S&W Study Approach					Peer Review Approach 1				
	Land Use	Rate/Equation Source	Net New Trips			Land Use	Rate/Equation Source	Net New Trips		
			Daily Trips	Total AM Trips	Total PM Trips			Daily Trips	Total AM Trips	Total PM Trips
Existing Land Use	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31
	Public Park & Multipurpose Recreational Facility	ITE 11th Edition for LUC 441 - Public Park and Boomers trip generation for Multipurpose recreational facility	4,427	52	380	**Equestrian Facility**	ITE 11th Edition for LUC 452 - Horse Race Track	300	30	55
	Total Existing		4,834	76	411	Total Existing		707	54	86
Proposed Land Use (**Maximum Potential**)	814 Dwelling Units	ITE 11th Edition for LUC 220 (8 units per acre, area 101.74 acres)	5,486	326	415	814 Dwelling Units	ITE 11th Edition for LUC 220 (8 units per acre, area 101.74 acres)	5,486	326	415
	Total Proposed		5,486	326	415	Total Proposed		5,486	326	415
	Traffic Generation Difference (Proposed means Existing)		**652**	**250**	**4**	**Traffic Generation Difference (Proposed means Existing)**		**4,779**	**272**	**329**
DIFFERENCE BETWEEN S&W AND PEER REVIEW APPROACH 1										
Daily Trips	**-4,127**					**-86%**				
Total AM Trips	**-22**					**-8%**				
Total PM Trips	**-325**					**-99%**				

TRIP GENERATION COMPARISON BETWEEN S&W STUDY AND PEER REVIEW APPROACH 2 AT MAXIMUM POTENTIAL										
	S&W Study Approach					Peer Review Approach 2				
	Land Use	Rate/Equation Source	Net New Trips			Land Use	Rate/Equation Source	Net New Trips		
			Daily Trips	Total AM Trips	Total PM Trips			Daily Trips	Total AM Trips	Total PM Trips
Existing Land Use	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31
	Public Park & Multipurpose Recreational Facility	ITE 11th Edition for LUC 441 - Public Park and Boomers trip generation for Multipurpose	4,427	52	380	**Equestrian Facility**	Rates from MTP Study	1,523	218	205
	Total Existing		4,834	76	411	Total Existing		1,930	242	236
Proposed Land Use (**Maximum Potential**)	814 Dwelling Units	ITE 11th Edition for LUC 220 (8 units per acre, area 101.74 acres)	5,486	326	415	814 Dwelling Units	ITE 11th Edition for LUC 220 (8 units per acre, area 101.74 acres)	5,486	326	415
	Total Proposed		5,486	326	415	Total Proposed		5,486	326	415
	Traffic Generation Difference (Proposed means Existing)		**652**	**250**	**4**	**Traffic Generation Difference (Proposed means Existing)**		**3,556**	**84**	**179**
DIFFERENCE BETWEEN S&W AND PEER REVIEW APPROACH 2										
Daily Trips	**-2,904**					**-82%**				
Total AM Trips	**166**					**199%**				
Total PM Trips	**-175**					**-98%**				

As shown in the table, the trip generation calculations from the TIS report used public park and multipurpose recreational facility as the existing land use. This approach overestimates the number of trips generated by the existing facility in comparison with a trip generation rate for equestrian facilities (i.e., Horse Racetrack) or the rates from the MTP Group Traffic Study and therefore misrepresents the actual existing condition, which implies that the proposed future development is expected to generate only 652 net new daily trips.

The calculations from the Peer Review for Approach 1 indicate that the proposed future development is expected to generate a maximum of 4,779 net new daily trips, if the ITE trip generation rates from Racetrack are used to calculate the number of trips for the existing land use.

Similarly, the Peer Review for Approach 2 indicates that the proposed future development is expected to generate a maximum of 3,556 net new daily trips, if the rates from the MTP Group Traffic Study are used to calculate the number of trips for the existing land use.

These discrepancies indicate that calculations from Simmons & White reduced the number of trips by as much as 86% (652 versus 4,779 trips per day) when compared to Peer Review Approach 1 and by as much as 82% (652 versus 3,556) when compared to Peer Review Approach 2. This clearly shows manipulation of rates to steer the calculations to a lower number of net new trips to be generated by the re-development.

Similarly, the applicant' trip generation comparison was conducted between the two mentioned approaches against the restricted potential development program as shown below.

Trip Generation Comparison – Restricted Potential Development Plan (Wellington North)

TRIP GENERATION COMPARISON BETWEEN S&W STUDY AND PEER REVIEW APPROACH 1 AT RESTRICTED POTENTIAL										
	S&W Study Approach					Peer Review Approach 1				
	Land Use	Rate/Equation Source	Net New Trips			Land Use	Rate/Equation Source	Net New Trips		
			Daily Trips	Total AM Trips	Total PM Trips			Daily Trips	Total AM Trips	Total PM Trips
Existing Land Use	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31
	Public Park & Multipurpose Recreational Facility	ITE 11th Edition for LUC 441 - Public Park and Boomers trip generation for Multipurpose recreational facility	4,427	52	380	**Equestrian Facility**	ITE 11th Edition for LUC 452 - Horse Race Track	300	30	55
	Total Existing		4,834	76	411	Total Existing		707	54	86
Proposed Land Use (**Restricted Potential**)	22 Single Family Units, 228 Multifamily Units, golf course and recreational community center	ITE 11th Edition for LUC 210, 220, 430, 495	3,444	213	285	22 Single Family Units, 228 Multifamily Units, golf course and recreational community center	ITE 11th Edition for LUC 210, 220, 430, 495 with no reductions	6,950	443	592
	Total Proposed		3,444	213	285	Total Proposed		6,950	443	592
	Traffic Generation Difference (Proposed menus Existing)		**-1,390**	**137**	**-126**	**Traffic Generation Difference (Proposed menus Existing)**		**6,243**	**389**	**506**
DIFFERENCE BETWEEN S&W AND PEER REVIEW APPROACH 1										
Daily Trips	**-7,633**					**-122%**				
Total AM Trips	**-252**					**-65%**				
Total PM Trips	**-632**					**-125%**				

TRIP GENERATION COMPARISON BETWEEN S&W STUDY AND PEER REVIEW APPROACH 2 AT RESTRICTED POTENTIAL										
	S&W Study Approach					Peer Review Approach 2				
	Land Use	Rate/Equation Source	Net New Trips			Land Use	Rate/Equation Source	Net New Trips		
			Daily Trips	Total AM Trips	Total PM Trips			Daily Trips	Total AM Trips	Total PM Trips
Existing Land Use	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31	Multifamily (Approved but No built)	ITE 11th Edition for LUC 220 (67 units)	407	24	31
	Public Park & Multipurpose Recreational Facility	ITE 11th Edition for LUC 441 - Public Park and Boomers trip generation for Multipurpose recreational facility	4,427	52	380	**Equestrian Facility**	Rates from MTP Study	1,523	218	205
	Total Existing		4,834	76	411	Total Existing		1,930	242	236
Proposed Land Use (**Restricted Potential**)	22 Single Family Units, 228 Multifamily Units, golf course and recreational community center	ITE 11th Edition for LUC 210, 220, 430, 495	3,444	213	285	22 Single Family Units, 228 Multifamily Units, golf course and recreational community center	ITE 11th Edition for LUC 210, 220, 430, 495 with no reductions	6,950	443	592
	Total Proposed		3,444	213	285	Total Proposed		6,950	443	592
	Traffic Generation Difference (Proposed menus Existing)		**-1,390**	**137**	**-126**	**Traffic Generation Difference (Proposed menus Existing)**		**5,020**	**201**	**356**
DIFFERENCE BETWEEN S&W AND PEER REVIEW APPROACH 2										
Daily Trips	**-6,410**					**-128%**				
Total AM Trips	**-64**					**-32%**				
Total PM Trips	**-482**					**-135%**				

As shown in the table above, the calculations from the applicant TIS report indicate a reduction in the net new trips for the proposed future development. The reduction is 1,390 daily trips. These results show a misleading advantage of the proposed future development because: 1) incorrect land uses were used to estimate the number of trips for the existing land use and 2) unjustified/unapproved rate reductions of 50% and 25% were applied to the golf course and recreational community center.

The outcomes of the trip generation calculations using Peer Review Approach 1 and 2, contradict the results of Simmons & White. Based on the Peer Review analysis, the proposed future development is expected to actually ***increase*** the number of trips by a maximum of 6,243 daily trips. This indicates that the calculations from Simmons & White reduced the number of trips by as much as 122% (i.e., -1,390 from S&W versus 6,243 from Peer Review). It is important to mention also that the trips credited by the pre-approved dwelling units are included in the peer-review analysis.

In conclusion, the Simmons & White approach to trip generation portrays is a misrepresentation of the current conditions with a purpose to over-escalate the current traffic demands of the existing site in order to obtain credit for future trips and/or to imply that future re-development net new trips added to network are fewer or negative in comparison to the existing conditions.

A further review of the Land Use Plan Amendment (LUPA) Trip Difference, identified the following discrepancies:

S & W Approach

LUPA Trip Difference – Restricted Potential

Daily Traffic Generation	=	1,390 tpd DECREASE
AM Peak Hour Traffic Generation	=	137 pht INCREASE
PM Peak Hour Traffic Generation	=	126 pht DECREASE

Since the change in land use will result in a decrease of daily traffic, the long range (Year 2045) is satisfied. However, a short-term (five year) analysis is required for the increase in traffic for the A.M. peak hour.

Peer Review Approach 1

LUPA Trip Difference – Restricted Potential (Based on Racetrack Rates)

Daily Traffic Generation = 6,243 tpd INCREASE
AM Peak Hour Trip Generation = 389 pht INCREASE
PM Peak Hour Trip Generation = 506 pht INCREASE

Peer Review Approach 2

LUPA Trip Difference – Restricted Potential (Based on MTP Rates)

Daily Traffic Generation = 5,020 tpd INCREASE
AM Peak Hour Trip Generation = 201 pht INCREASE
PM Peak Hour Trip Generation = 356 pht INCREASE

Based on the calculations from Simmon and White, the proposed change in land use will result in a *decrease* in the number of daily trips (1,390 tpd) therefore, the long range (Year 2045) is satisfied. This statement is inaccurate since the calculations through Peer Review approaches revealed the opposite. It is concluded that the proposed change in land use will result in an ***increase*** in the number of trips (+6,243 tpd) under the Peer Review Approach 1 and an ***increase*** of 5,020 tpd under Peer Review Approach 2.

The Land Use Plan Amendment (LUPA) analysis is supported by the Palm Beach County Traffic Performance Standards (TPS) which aims to identify which potential links of the network could be considered critical and the applicant should mitigate if capacity is exceeded. The TPS analysis consider two tests as described below.

CHAPTER B STANDARD

Section 1 General

There is hereby established a TPS for all Major Thoroughfares within PBC. Except as specifically provided in this Article, no Site Specific Development Order shall be issued for a proposed Project which would violate this standard. This standard consists of two tests. The first test relates to the Buildout Period of the Project and requires that the Project not add Traffic in the Radius of Development Influence which would have Total Traffic exceeding the Adopted LOS at the end of the Buildout Period. The second test relates to the evaluation of traffic five years in the future and requires that the Project not add Traffic in the Radius of Development Influence which would have Total Traffic exceeding the Adopted LOS at the end of the Five-Year Analysis Period. Total Traffic for Test 2 is based in part upon Background Traffic information from the TPS Database. Where a CRALLS service volume has been adopted, those volumes shall apply. Where a CRALLS service volume has been adopted for one or more of the LINKS that constitute the legs of the intersection, the allowable service volume for the intersection shall be calculated as follows: Allowable CRALLS intersection volume = [sum of CRALLS Link volume(s) or Link LOS D volumes (for those LINKS without CRALLS), whichever is applicable, for all legs of intersection / (sum of Link LOS D volume(s) for all legs of intersection)] x 1,400. For Test 2 purposes, LOS E volumes and a 1,500 critical sum shall be used in the preceding formula for determination of the allowable CRALLS intersection volumes. **[Ord. 2006-043] [Ord. 2007-013] [Ord. 2009-040]**

As part of the application, Simmons & White concluded that test 1 was not required as a "decrease" in daily trips is expected. Thus, only the Five-Year Project Significance Analysis for the AM peak hour is needed. However, the results of the peer review trip generation comparison revealed the opposite. Because daily trips are expected to increase and therefore, Test 1 is required; also, the Five-Year Project Significance Analysis for PM Peak is required, as the number of trips is expected to increase.

Once the analysis is performed using the calculated maximum of AM peak hour trips (389 vph) as obtained through the peer review approach, the results will show change and additional links will reach a significant level, as point-out in the following table.

LUPA ANALYSIS - FIVE YEAR ANALYSIS - PROJECT SIGNIFICANCE CALCULATION - PEER REVIEW

AM PEAK HOUR

2027 BUILDOUT

TOTAL AM PEAK HOUR PROJECT TRIPS (ENTERING)	218
TOTAL AM PEAK HOUR PROJECT TRIPS (EXISTING)	171
TOTAL	**389**

ROADWAY	FROM	TO	PROJECT DISTRIBUTION	AM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS D STANDARD	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
SOUTH SHORE BOULEVARD	PIERSON ROAD	GREEN VIEW SHORES BOULEVARD	17%	29	4D	I	2000	1.5%	YES
FOREST HILL BOULEVARD	SOUTH SHORE BOULEVARD	STRIBLING WAY	20%	34	6D	I	3020	1.1%	YES
FOREST HILL BOULEVARD	STRIBLING WAY	SR 7	28%	48	6D	I	3020	1.6%	YES
LAKE WORTH ROAD	120TH AVENUE	SR 7	16%	27	4D	I	2000	1.4%	YES
STRIBLING WAY	FOREST HILL BOULEVARD	FAIRLANE FAMRS ROAD	8%	14	4	I	880	1.6%	YES
STRIBLING WAY	FAIRLANE FAMRS ROAD	SR 7	8%	14	4	I	880	1.6%	YES
GREENVIEW SHORES BOULE	WELLINGTON TRACE	GREENBRIAR BOULEVARD	15%	26	4D	I	2000	1.3%	YES
GREENVIEW SHORES BOULE	GREENBRIAR BOULEVARD	SOUTH SHORE BOULEVARD	15%	26	4D	I	2000	1.3%	YES
120TH AVENUE	PIERSON ROAD	LAKE WORTH ROAD	4%	7	2	II	640	1.1%	YES

These results also shows that Simmons & White did not consider several links to be significant due to the use of reduced number of trips in the estimation of segment significance. The table highlight links that were not considered in the applicant TIS report as significant and that must likely they are once the proper trip generation rate are assessed.

WELLINGTON NORTH

07/21/2022
Revised: 09/02/2022
Revised: 10/10/2022
Revised: 11/01/2022
Revised: 04/03/2023
Revised: 05/07/2023

TABLE 14
FIVE YEAR ANALYSIS - PROJECT SIGNIFICANCE CALCULATION
AM PEAK HOUR

2027 BUILD OUT
TOTAL AM PEAK HOUR PROJECT TRIPS (ENTERING) = 60
TOTAL AM PEAK HOUR PROJECT TRIPS (EXITING) = 77

ROADWAY	FROM	TO	PROJECT DISTRIBUTION	AM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS D STANDARD	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
PIERSON ROAD	OUSLEY FARMS ROAD	SOUTH SHORE BOULEVARD	18%	14	2	II	800	1.73%	YES
PIERSON ROAD	SOUTH SHORE BOULEVARD	SITE	20%	15	2	II	800	1.93%	YES
PIERSON ROAD	SITE	120TH AVENUE	20%	15	2	II	750	2.05%	YES
PIERSON ROAD	120TH AVENUE	FAIRLANE FAMRS ROAD	16%	12	2	II	750	1.64%	YES
SOUTH SHORE BOULEVARD	LAKE WORTH ROAD	PIERSON ROAD	19%	15	2D	II	840	1.74%	YES
SOUTH SHORE BOULEVARD	PIERSON ROAD	GREENVIEW SHORES BOULEV	17%	13	4D	I	2000	0.65%	NO
SOUTH SHORE BOULEVARD	GREENVIEW SHORES BOULEV	BIG BLUE TRACE	28%	22	4D	I	2000	1.08%	YES
SOUTH SHORE BOULEVARD	BIG BLUE TRACE	FOREST HILL BOULEVARD	28%	22	4D	I	2000	1.08%	YES
FOREST HILL BOULEVARD	SOUTHERN BOULEVARD	WELLINGTON TRACE N.	7%	5	6D	I	3020	0.18%	NO
FOREST HILL BOULEVARD	WELLINGTON TRACE N.	WELLINGTON TRACE S.	4%	3	4D	I	2000	0.15%	NO
FOREST HILL BOULEVARD	WELLINGTON TRACE S.	SOUTH SHORE BOULEVARD	4%	3	4D	I	2000	0.15%	NO
FOREST HILL BOULEVARD	SOUTH SHORE BOULEVARD	STRIBLING WAY	20%	15	6D	I	3020	0.51%	NO
FOREST HILL BOULEVARD	STRIBLING WAY	SR 7	28%	22	6D	I	3020	0.71%	NO
FOREST HILL BOULEVARD	SR 7	LYONS ROAD	10%	8	6D	I	2940	0.26%	NO
LAKE WORTH ROAD	SOUTH SHORE BOULEVARD	120TH AVENUE	12%	9	2	I	880	1.05%	YES
LAKE WORTH ROAD	120TH AVENUE	SR 7	16%	12	4D	I	2000	0.62%	NO
LAKE WORTH ROAD	SR 7	LYONS ROAD	12%	9	6D	II	2680	0.34%	NO
STRIBLING WAY	FOREST HILL BOULEVARD	FAIRLANE FAMRS ROAD	8%	6	2	I	880	0.70%	NO
STRIBLING WAY	FAIRLANE FAMRS ROAD	SR 7	8%	6	4	I	880	0.70%	NO
				0					
GREENVIEW SHORES BOULEVARD	BINKS FOREST DRIVE	PADDOCK DRIVE	4%	3	2	I	880	0.35%	NO
GREENVIEW SHORES BOULEVARD	PADDOCK DRIVE	WELLINGTON TRACE	4%	3	2	I	880	0.35%	NO
GREENVIEW SHORES BOULEVARD	WELLINGTON TRACE	GREENBRIAR BOULEVARD	15%	12	4D	I	2000	0.58%	NO
GREENVIEW SHORES BOULEVARD	GREENBRIAR BOULEVARD	SOUTH SHORE BOULEVARD	15%	12	4D	I	2000	0.58%	NO
WELLINGTON TRACE	GREENVIEW SHORES BOULEV	BIG BLUE TRACE	11%	8	4D	I	2000	0.42%	NO
WELLINGTON TRACE	BIG BLUE TRACE	FOREST HILL BOULEVARD	7%	5	4D	I	2000	0.27%	NO
				0					
BIG BLUE TRACE	WELLINGTON TRACE	SOUTHERN BOULEVARD	4%	3	2	I	880	0.35%	NO
BINKS FOREST DRIVE	GREENVIEW SHORES BOULEV	SOUTHERN BOULEVARD	9%	7	4D	I	2000	0.35%	NO
SOUTHERN BOULEVARD	SEMINOLE PRATT WHITNEY RO	BINKS FOREST DRIVE	9%	7	6D	I	2940	0.24%	NO
SOUTHERN BOULEVARD	BIG BLUE TRACE	FOREST HILL BOULEVARD	4%	3	6D	I	2940	0.10%	NO
STATE ROAD 7	SOUTHERN BOULEVARD	FOREST HILL BOULEVARD	15%	12	8D	I	3940	0.29%	NO
STATE ROAD 7	FOREST HILL BOULEVARD	STRIBLING WAY	4%	3	8D	I	3940	0.08%	NO
STATE ROAD 7	STRIBLING WAY	LAKE WORTH ROAD	4%	3	8D	I	3940	0.08%	NO
STATE ROAD 7	LAKE WORTH ROAD	LANTANA ROAD	8%	6	6D	I	2940	0.21%	NO
AERO CLUB DRIVE	BINKS FOREST ROAD	GREENBRIAR BOULEVARD	5%	4	2	I	880	0.44%	NO
120TH AVENUE	PIERSON ROAD	LAKE WORTH ROAD	4%	3	2	II	640	0.48%	NO
40TH STREET	SHOWGROUNDS	LAKE WORTH ROAD	5%	4	2	I	880	0.44%	NO

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AL

SIMMONS & WHITE

Wellington South

The tables below show that the trip generation rates for the proposed showgrounds were derived from counts collected at the PBIEC in 2016 and information from the PBIEC Trip Generation Study conducted by MTP Group dated August 5, 2013. This is awkward as this same report should be applicable to Wellington North.

The traffic data used in the trip generation calculations is **outdated** since additions and/or modifications were implemented to the PBIEC venue between 2016 and 2022. The number of trips entering and exiting the venue have changed. Therefore, the data used to derive trip generation rates should not be accepted. Moreover, the critical aspect of this project is not the residential development but the showgrounds. Please note that 79% of net trips of this project can be attributed to the showground site for which the applicant has not provided a site plan.

EQUESTRIAN VILLAGE ESTATES

07/21/2022
Revised: 09/02/2022
Revised: 10/10/2022
Revised: 11/01/2022

PROPOSED DEVELOPMENT

TABLE 15 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Single Family Detached	210	197	Dwelling Units	10			1,970	25.0%	493	1,477	0%	0	1,477
Showgrounds	N/A	5,000	Attendees	1.1592			5,796	8.5%	493	5,303	0%	0	5,303
			Grand Totals:				7,766	12.7%	986	6,780	0%	0	6,780

TABLE 16 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	197	Dwelling Units	0.7	0.24	0.76	33	105	138	25.0%	8	27	35	25	78	103	0%	0	25	78	103
Showgrounds	N/A	5,000	Attendees	0.0696	0.68	0.32	237	111	348	10.1%	27	8	35	210	103	313	0%	0	210	103	313
							270	216	486	14.4%	35	35	70	235	181	416	0%	0	235	181	416

TABLE 17 - PM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	197	Dwelling Units	0.94	0.63	0.37	123	72	195	25.0%	31	18	49	92	54	146	0%	0	92	54	146
Showgrounds	N/A	5,000	Attendees	0.0928	0.40	0.60	187	277	464	10.6%	18	31	49	169	246	415	0%	0	169	246	415
			Grand Totals:				310	349	659	14.3%	49	49	98	261	300	561	0%	0	261	300	561

TABLE 18 - Saturday Peak Hour Traffic Generation

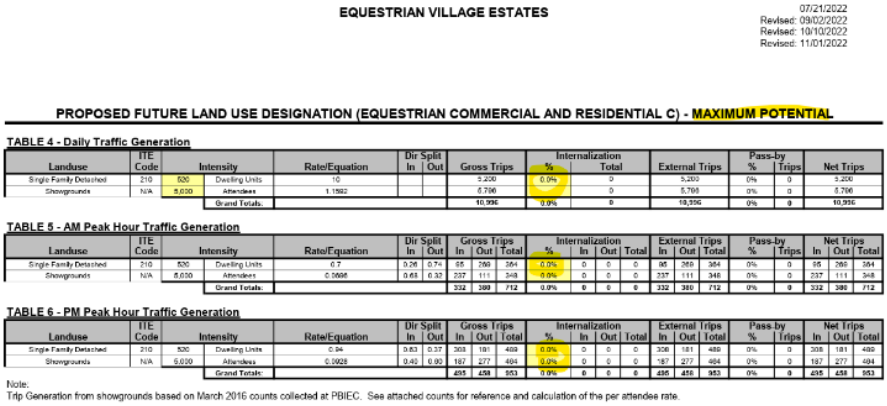
Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	197	Dwelling Units	0.94	0.63	0.37	123	72	195	25.0%	31	18	49	92	54	146	0%	0	92	54	146
Showgrounds	N/A	7,000	Spectators	0.23	0.73	0.27	1,175	435	1,610	3.0%	18	31	49	1,157	404	1,561	0%	0	1157	404	1561
			Grand Totals:				1,298	507	1,805	5.4%	49	49	98	1,249	458	1,707	0%	0	1,249	458	1,707

Note:
Trip Generation for weekday showgrounds based on March 2016 counts collected at PBIEC. See attached counts for reference and calculation of the per attendee rate.
Trip Generation for Saturday peak event from MTP Group Traffic Study dated August 5, 2013

As part of the showgrounds, the trip generation for the Saturday peak hour was calculated using a lower number of spectators (5,000), as the proposed development plan indicates that the overall new equestrian venue will be able to serve up to 15,000 spectators for Saturday peak events.

Next, the applicant TIS indicated that additional trips generated by the proposed showgrounds were based on an increase of 7,000 spectators because the Saturday peak season counts were collected previously as part of the Village Study which already accounts for Saturday event traffic. This transposition of 2013's Saturday volumes to today's conditions is not a reasonable approach since those Saturday counts are considered outdated and traffic conditions have changed; also, the PBIEC facility has changed due to implementation of additions/modifications to the venue.

It is also important to show that the trip generation calculations for the Maximum Potential, summarized in Tables 4 through 6 do not apply internalization reductions, while the calculations for the Restricted Potential, summarized in Tables 7 through 9 apply internalization deductions. The purpose of those discrepancies is to mislead that the applicant's proposed development plan is more beneficial than the maximum development potential resulting in a decrease in the number of new trips. Note the discrepancies highlighted in the images below.



EQUESTRIAN VILLAGE ESTATES

07/21/2022
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Revised: 11/01/2022

PROPOSED FUTURE LAND USE DESIGNATION (EQUESTRIAN COMMERCIAL AND RESIDENTIAL C) - MAXIMUM POTENTIAL

TABLE 4 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Single Family Detached	210	520	Dwelling Units	10			5,200	0.0%	0	5,200	0%	0	5,200
Showgrounds	N/A	5,000	Attendees	1.1592			5,796		0	5,796	0%	0	5,796
			Grand Totals:				10,996	0.0%	0	10,996	0%	0	10,996

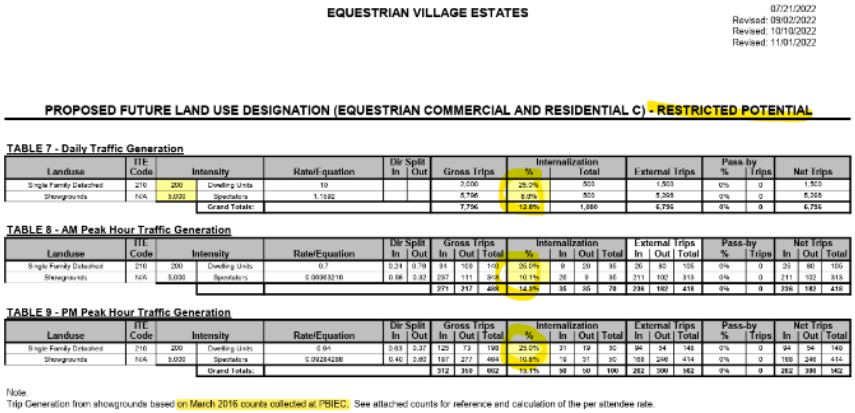
TABLE 5 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	520	Dwelling Units	0.7	0.26	0.74	95	269	364	0.0%	0	0	0	95	269	364	0%	0	95	269	364
Showgrounds	N/A	5,000	Attendees	0.0668	0.68	0.32	237	111	348	0.0%	0	0	0	237	111	348	0%	0	237	111	348
			Grand Totals:				332	380	712	0.0%	0	0	0	332	380	712	0%	0	332	380	712

TABLE 6 - PM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	520	Dwelling Units	0.94	0.63	0.37	308	181	489	0.0%	0	0	0	308	181	489	0%	0	308	181	489
Showgrounds	N/A	5,000	Attendees	0.0928	0.40	0.60	187	277	464	0.0%	0	0	0	187	277	464	0%	0	187	277	464
			Grand Totals:				495	458	953	0.0%	0	0	0	495	458	953	0%	0	495	458	953

Note:
Trip Generation from showgrounds based on March 2016 counts collected at PBIEC. See attached counts for reference and calculation of the per attendee rate.



EQUESTRIAN VILLAGE ESTATES

07/21/2022
Revised: 09/02/2022
Revised: 10/10/2022
Revised: 11/01/2022

PROPOSED FUTURE LAND USE DESIGNATION (EQUESTRIAN COMMERCIAL AND RESIDENTIAL C) - RESTRICTED POTENTIAL

TABLE 7 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Single Family Detached	210	200	Dwelling Units	10			2,000	25.2%	503	1,503	0%	0	1,503
Showgrounds	N/A	5,000	Spectators	1.1592			5,796	5.0%	503	5,388	0%	0	5,388
			Grand Totals:				7,796	12.8%	1,000	6,795	0%	0	6,795

TABLE 8 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	200	Dwelling Units	0.7	0.24	0.76	34	103	140	20.0%	9	29	38	26	80	106	0%	0	26	80	106
Showgrounds	N/A	5,000	Spectators	0.06963216	0.68	0.32	237	111	348	10.1%	26	9	35	211	102	313	0%	0	211	102	313
							271	217	488	14.8%	35	35	70	236	182	418	0%	0	236	182	418

TABLE 9 - PM Peak Hour Traffic Generation

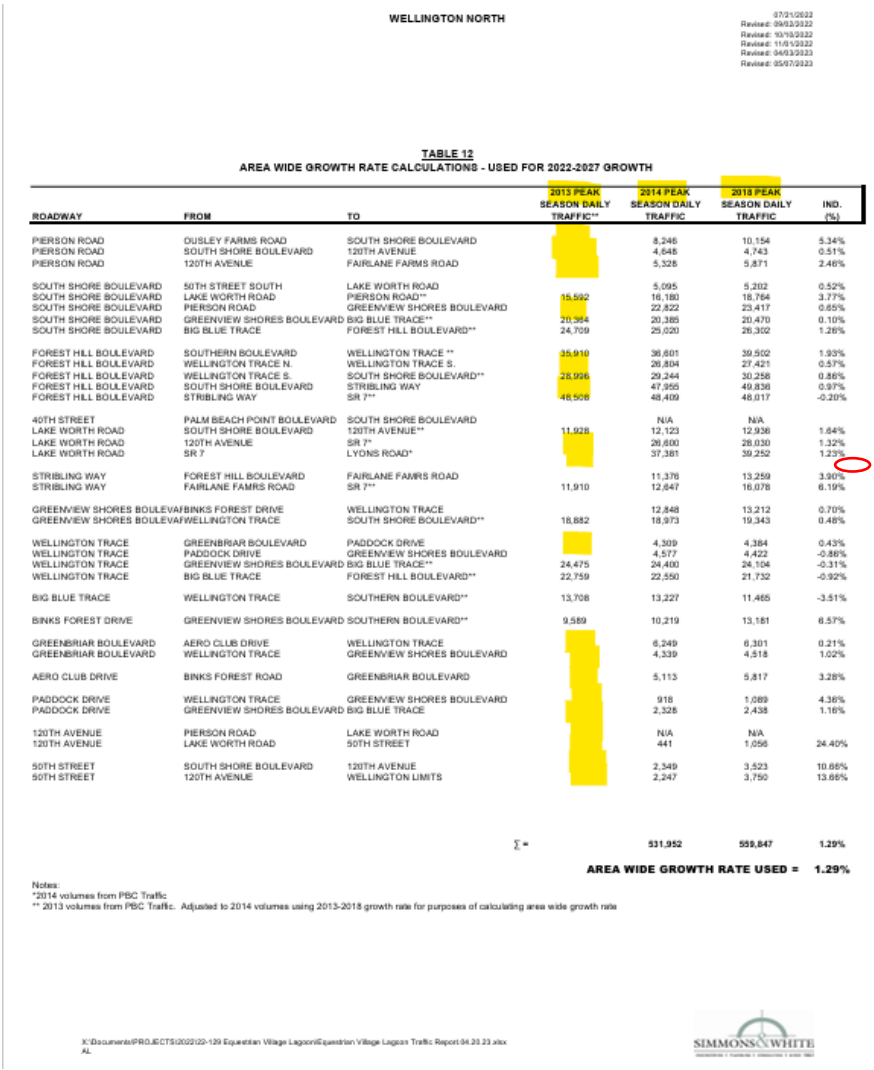
Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Single Family Detached	210	200	Dwelling Units	0.94	0.63	0.37	129	73	190	20.0%	31	19	50	94	54	140	0%	0	94	54	140
Showgrounds	N/A	5,000	Spectators	0.09284288	0.40	0.60	187	277	464	10.8%	18	31	50	169	246	414	0%	0	169	246	414
			Grand Totals:				312	350	662	13.1%	50	50	100	262	300	562	0%	0	262	300	562

Note:
Trip Generation from showgrounds based on March 2016 counts collected at PBIEC. See attached counts for reference and calculation of the per attendee rate.

2.3 GROWTH RATE

The area growth rate calculations do not appear to be accurate for these projects; this topic is applicable for both North and South projects. The following issues were identified:

- The studies did not use the latest traffic data from the Palm Beach County TPS database.



WELLINGTON NORTH

07/21/2022
Revised: 09/02/2022
Revised: 10/10/2022
Revised: 11/01/2022
Revised: 04/03/2023
Revised: 05/07/2023

TABLE 12
AREA WIDE GROWTH RATE CALCULATIONS - USED FOR 2022-2027 GROWTH

ROADWAY	FROM	TO	2013 PEAK SEASON DAILY TRAFFIC**	2014 PEAK SEASON DAILY TRAFFIC	2018 PEAK SEASON DAILY TRAFFIC	IND. (%)
PIERSON ROAD	OUSLEY FARMS ROAD	SOUTH SHORE BOULEVARD		8,246	10,154	5.34%
PIERSON ROAD	SOUTH SHORE BOULEVARD	120TH AVENUE		4,648	4,743	0.51%
PIERSON ROAD	120TH AVENUE	FAIRLANE FARMS ROAD		5,328	5,871	2.46%
SOUTH SHORE BOULEVARD	50TH STREET SOUTH	LAKE WORTH ROAD		5,095	5,202	0.52%
SOUTH SHORE BOULEVARD	LAKE WORTH ROAD	PIERSON ROAD**	15,592	16,180	18,764	3.77%
SOUTH SHORE BOULEVARD	PIERSON ROAD	GREENVIEW SHORES BOULEVARD		22,822	23,417	0.65%
SOUTH SHORE BOULEVARD	GREENVIEW SHORES BOULEVARD	BIG BLUE TRACE**	20,364	20,385	20,470	0.10%
SOUTH SHORE BOULEVARD	BIG BLUE TRACE	FOREST HILL BOULEVARD**	24,709	25,020	26,302	1.26%
FOREST HILL BOULEVARD	SOUTHERN BOULEVARD	WELLINGTON TRACE **	35,910	36,601	39,502	1.93%
FOREST HILL BOULEVARD	WELLINGTON TRACE N.	WELLINGTON TRACE S.		26,804	27,421	0.57%
FOREST HILL BOULEVARD	WELLINGTON TRACE S.	SOUTH SHORE BOULEVARD**	28,996	29,244	30,258	0.86%
FOREST HILL BOULEVARD	SOUTH SHORE BOULEVARD	STRIBLING WAY		47,955	49,836	0.97%
FOREST HILL BOULEVARD	STRIBLING WAY	SR 7**	48,508	48,409	48,017	-0.20%
40TH STREET	PALM BEACH POINT BOULEVARD	SOUTH SHORE BOULEVARD		N/A	N/A	
LAKE WORTH ROAD	SOUTH SHORE BOULEVARD	120TH AVENUE**	11,928	12,123	12,936	1.64%
LAKE WORTH ROAD	120TH AVENUE	SR 7*		26,600	28,030	1.32%
LAKE WORTH ROAD	SR 7	LYONS ROAD*		37,381	39,252	1.23%
STRIBLING WAY	FOREST HILL BOULEVARD	FAIRLANE FAMRS ROAD		11,376	13,259	3.90%
STRIBLING WAY	FAIRLANE FAMRS ROAD	SR 7**	11,910	12,647	16,078	6.19%
GREENVIEW SHORES BOULEVAR	BINKS FOREST DRIVE	WELLINGTON TRACE		12,848	13,212	0.70%
GREENVIEW SHORES BOULEVAR	WELLINGTON TRACE	SOUTH SHORE BOULEVARD**	18,882	18,973	19,343	0.48%
WELLINGTON TRACE	GREENBRIAR BOULEVARD	PADDOCK DRIVE		4,309	4,384	0.43%
WELLINGTON TRACE	PADDOCK DRIVE	GREENVIEW SHORES BOULEVARD		4,577	4,422	-0.86%
WELLINGTON TRACE	GREENVIEW SHORES BOULEVARD	BIG BLUE TRACE**	24,475	24,400	24,104	-0.31%
WELLINGTON TRACE	BIG BLUE TRACE	FOREST HILL BOULEVARD**	22,759	22,550	21,732	-0.92%
BIG BLUE TRACE	WELLINGTON TRACE	SOUTHERN BOULEVARD**	13,708	13,227	11,465	-3.51%
BINKS FOREST DRIVE	GREENVIEW SHORES BOULEVARD	SOUTHERN BOULEVARD**	9,589	10,219	13,181	6.57%
GREENBRIAR BOULEVARD	AERO CLUB DRIVE	WELLINGTON TRACE		6,249	6,301	0.21%
GREENBRIAR BOULEVARD	WELLINGTON TRACE	GREENVIEW SHORES BOULEVARD		4,339	4,518	1.02%
AERO CLUB DRIVE	BINKS FOREST ROAD	GREENBRIAR BOULEVARD		5,113	5,817	3.28%
PADDOCK DRIVE	WELLINGTON TRACE	GREENVIEW SHORES BOULEVARD		918	1,089	4.36%
PADDOCK DRIVE	GREENVIEW SHORES BOULEVARD	BIG BLUE TRACE		2,328	2,438	1.16%
120TH AVENUE	PIERSON ROAD	LAKE WORTH ROAD		N/A	N/A	
120TH AVENUE	LAKE WORTH ROAD	50TH STREET		441	1,056	24.40%
50TH STREET	SOUTH SHORE BOULEVARD	120TH AVENUE		2,349	3,523	10.66%
50TH STREET	120TH AVENUE	WELLINGTON LIMITS		2,247	3,750	13.66%
		Σ =		531,952	559,847	1.29%
				AREA WIDE GROWTH RATE USED =		1.29%

Notes:
*2014 volumes from PBC Traffic
** 2013 volumes from PBC Traffic. Adjusted to 2014 volumes using 2013-2018 growth rate for purposes of calculating area wide growth rate

X:\Documents\PROJECTS\2022\22-129 Equestrian Village Lagoon\Equestrian Village Lagoon Traffic Report 04.20.23.xlsx
AL

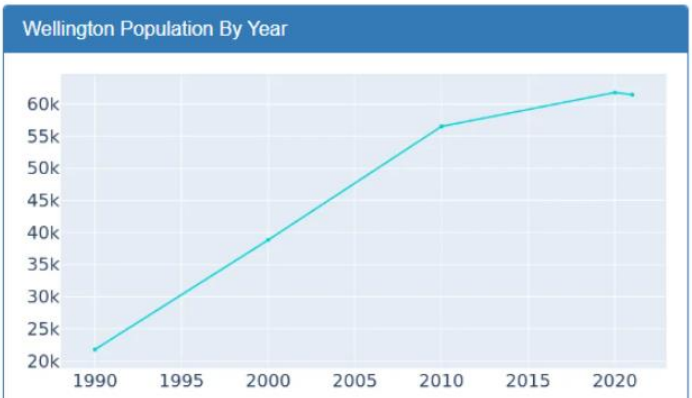
SIMMONS & WHITE

- As shown in the above table, the area wide grow rate calculations did not utilize consecutive historical peak season traffic counts. The calculations were performed missing 2015, 2016, and 2017 peak season traffic counts. While consecutive historical peak season traffic counts from 2018 to 2023 are available in the Palm Beach County TPS database the report does not explain why the latest counts were not used.

Also shown in the table, growth rate calculations used were determine missing 2013 traffic information for Pierson Road, Lake Worth Road, Stribling Way, Greenview Shores Boulevard, Wellington Trace, Greenbriar Boulevard, Aero Club Drive, Paddock Drive, 120th Avenue, and 50th Street.

- Another aspect is the fact that the studies did not consider the use of the Southeast Florida Regional Planning Model (SERPM) to estimate the area growth rate. The SERPM is a more precise tool available to be utilized during planning stages of new projects.

- A review of population growth for the Village of Wellington also revealed that population grew at average rate of 2.6% (see graphic in the next page).



Year	Population	Rank in US	Growth Rate
2021	61,448	627	-0.5%
2020	61,779	619	0.9%
2010	56,508	615	3.8%
2000	38,833	833	6.0%
1990	21,754	1,269	–

This growth indicates once again that the area growth rate of 1.29% estimated in the reports is inaccurate and unrealistic.

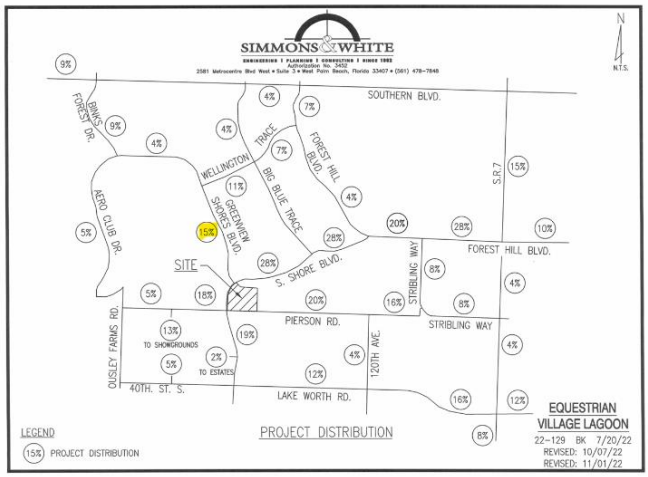
2.4 TRIP DISTRIBUTION AND TRIP ASSIGMENT

The purpose of Trip Distribution and Trip Assignment are to allocate the net future trip generation into the network. This effort is to follow a logical approach based on knowledge of the network, trip selection mechanisms of the drivers, and nowadays supported by the regional planning model.

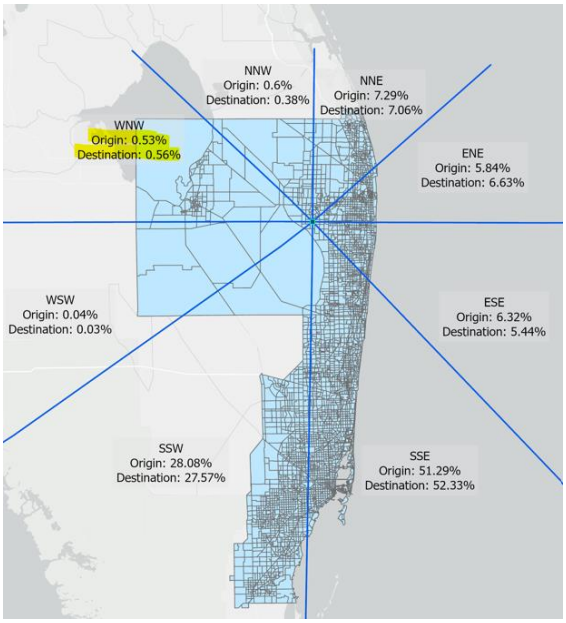
Wellington North

The following issues were identified:

- The TIS report does not describe the approach used to develop the project distribution and assignment. The project distribution is referenced on Page 6 and presented in the image below. However, there is no graphic display of the trip assigned to each roadway impacted by the project trips.



- The report does not provide information to verify the adequacy of the trip distribution percentages. The source or process undertaken to develop the percentages is not clear. Moreover, some percentages appear to be incorrect. For instance, 15% of trips were assigned to/from the northwest via Greenview Shore Boulevard. This percentage is extremely high when compared with a distribution obtained by running SERPM as shown in the figure below. Note that the model estimates a percentage that is less than 1% coming/departing from the northwest.



- The project driveway trip assignments also present inconsistencies. Note that 20% of the project trips exiting the proposed site were assigned to the service driveway that is supposed to be used by employees only. This 20% percentage is the same percentage assigned to the driveway located at the east that is intended to be used by residents and visitors (refer to image below for details).

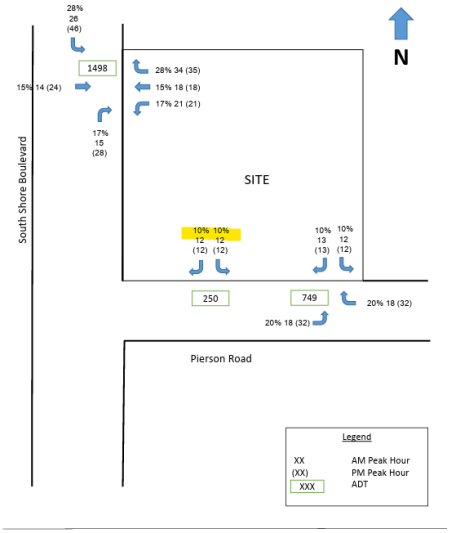


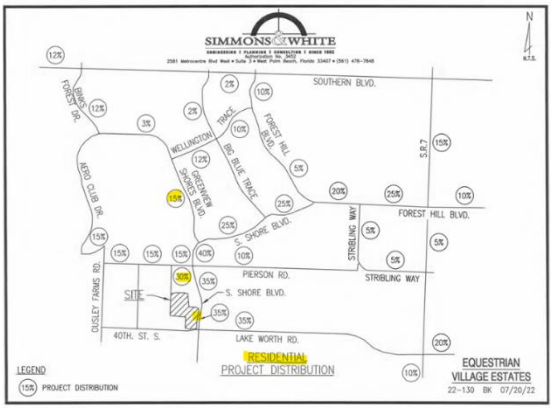
Figure 1 – Turning Movement Worksheet
Wellington North
Project # 22-129

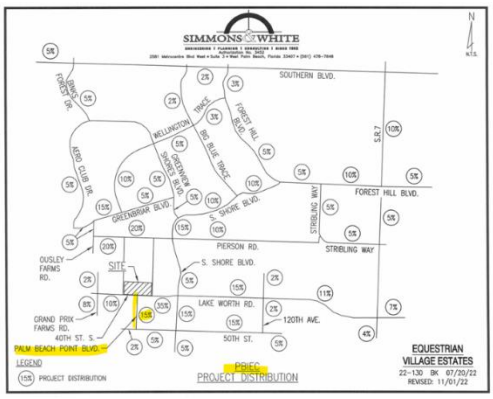
SIMMONS & WHITE

Wellington South

The following issues were identified:

- The applicant TIS report does not describe the approach used to develop the project distribution and assignment for each of the land uses. The project distribution is referenced on Page 7 and presented in the images below. However, there is no graphic display of the trip assigned to each roadway impacted by the project trips. Moreover, some percentages appear to be incorrect. For instance, 15% of the showground's trips were assigned to/from Palm Beach Point Boulevard. This percentage is extremely high when compared with a distribution for the WSW direction obtained by running SERPM.





Both projects trip distribution and assignment were unclearly developed without using a logical supported approach that could provide rational in the trip distribution and assignment. Not having an adequate approach trip distribution impact into the network and at the intersections could be misleading by over-estimating the trips in low-volume roads and under-estimating the trips in high demand roads, which ultimately distort the results of the traffic impact.

2.5 CAPACITY ANALYSIS AND ROADWAY IMPROVEMENTS

The purpose of a capacity analysis is to provide information about the existing and future conditions network operations and consider performance measures such as level of service, volume/capacity and speed to establish potential off-site improvements necessary to mitigate traffic impacts.

It is important to note that as the baseline conditions presented as part these TIS for both developments are questionable as it has been commented in the trip generation, LUPA , trip distribution and trip assignment analyses sections, the operational analysis and proposed improvements will be falling short as the intensity of the key intersections could be much higher than those presented by the applicant traffic studies.

Wellington North/South

A review of the capacity analysis results revealed the following issues:

- Because traffic data was not collected recently, intersection capacity analyses for existing conditions (year 2022) were not performed. The study does not establish a baseline of current operating conditions to determine if intersections are failing due to existing traffic conditions or future traffic growth and/or traffic from committed developments.

  Table 2 Summarizes the roadway conditional improvements identified as background improvements and provides comments on constructability and traffic issues.

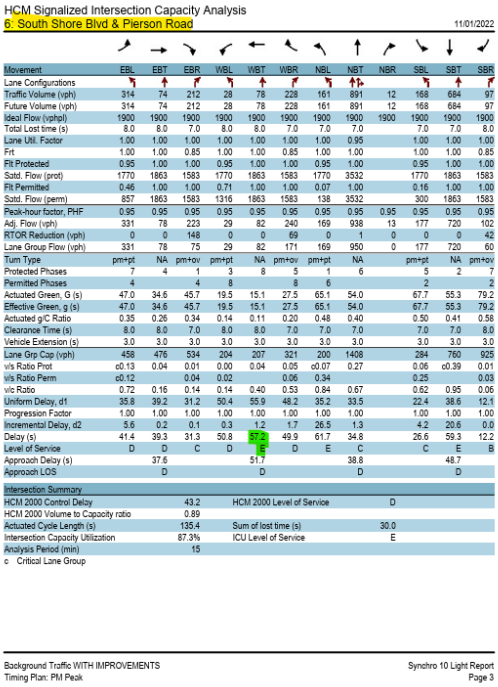
Table 2 –Offsite Conditional Improvements.

Improvement	Comments
1. Exclusive eastbound and westbound left-turn lanes at Pierson Road and South Shore Boulevard. Implementation: No build Notes: Payment in lieu of construction	Background improvement identified in 2013 under the approval of Equestrian Village. Lack of traffic data do not facilitate an informed decision to determine whether these improvements will suffice to alleviate current traffic conditions
2. Exclusive eastbound and westbound right-turn lanes at Pierson Road and South Shore Boulevard. Implementation: As part of the left-turn lane improvements project	Plans from Sexton Engineering plans do not identify right-turn lanes. The project study identifies the need for improvements. However, it is stated that it is a background improvement and not needed due to the project impacts
3. Traffic signal or roundabout at Lake Worth Road and 120th Avenue Implementation: No build Notes: 1.3% Proportional share	Improvement identified in the study. Proportionate share calculations are included. Applicability and constructability have not been evaluated. The intersection is expected to be impacted by both the developments
4. Major Roadway Improvements at SR 7 and Stribling Way Implementation: No build	Identified as background in the report. Applicability has not been evaluated
5. Major Roadway Improvements at SR 7 and Forest Hill Boulevard Implementation: No build	Identified as background improvements in the report. Constructability of these improvements is questionable
Driveways	The need for the implementation of turn lanes at the project driveways was evaluated in the TIS. The TIS results of the evaluation revealed that no additional turn lanes appear to be warranted. However, driveway trips demonstrate high demands greater than the thresholds for turn lanes in particular for Gene Mische Way along SW 40 Street and Pierson Road.

Note that most of these improvements are supposed to be background improvements that the TIS assumes to be constructed as part of the original application; it implies that all background operational conditions are acceptable, which is not reasonable. In addition, the applicant TIS report self-demonstrates that there are critical movements that will become more congested and over-

saturated that will not be addressed by the offsite improvements of the proposed developments.

- The reports do not identify additional improvements to mitigate critical movement failures due to traffic impacts created by the project trips. For instance, on the Wellington North report, the westbound through movement at the intersection of Pierson Road and South Shore Boulevard fails with under the Background with Improvements (LOS E and 57.2 sec of delay) and continues to fail under the Total Future with Improvements (LOS E and 62.7sec of delay) This indicates that the report does not address critical movement failures caused by the project trips stating that the intersection has background failures. A similar situation occurs to the southbound through movement.



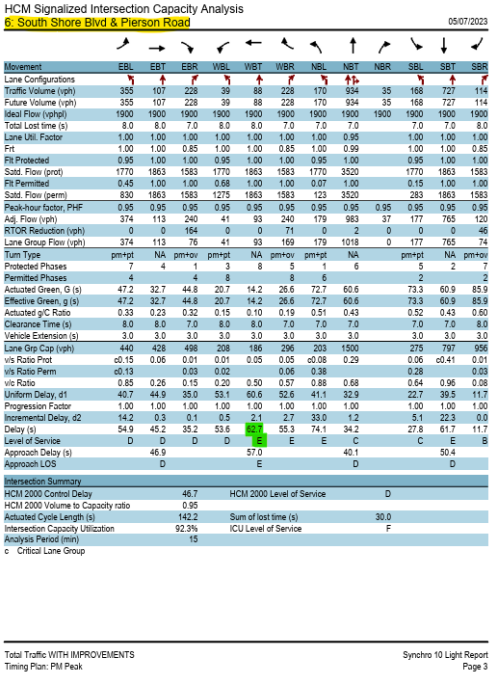
HCM Signalized Intersection Capacity Analysis
6: South Shore Blvd & Pierson Road 11/01/2022

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	314	74	212	28	78	228	161	891	12	168	684	97
Future Volume (vph)	314	74	212	28	78	228	161	891	12	168	684	97
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.95		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1770	1863	1583	1770	1863	1583	1770	3532		1770	1863	1583
Flt Permitted	0.46	1.00	1.00	0.71	1.00	1.00	0.07	1.00		0.16	1.00	1.00
Satd. Flow (perm)	857	1863	1583	1316	1863	1583	138	3532		300	1863	1583
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	331	78	223	29	82	240	169	938	13	177	720	102
RTOR Reduction (vph)	0	0	148	0	0	69	0	1	0	0	0	42
Lane Group Flow (vph)	331	78	75	29	82	171	169	950	0	177	720	60
Turn Type	pm+pt	NA	pm+ov	pm+pt	NA	pm+ov	pm+pt	NA		pm+pt	NA	pm+ov
Protected Phases	7	4	1	3	8	5	1	6		5	2	7
Permitted Phases	4		4	8		8	6			2		2
Actuated Green, G (s)	47.0	34.6	45.7	19.5	15.1	27.5	65.1	54.0		67.7	55.3	79.2
Effective Green, g (s)	47.0	34.6	45.7	19.5	15.1	27.5	65.1	54.0		67.7	55.3	79.2
Actuated g/C Ratio	0.35	0.26	0.34	0.14	0.11	0.20	0.48	0.40		0.50	0.41	0.58
Clearance Time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	458	476	534	204	207	321	200	1408		284	760	925
v/s Ratio Prot	c0.13	0.04	0.01	0.00	0.04	0.05	c0.07	0.27		0.06	c0.39	0.01
v/s Ratio Perm	c0.12		0.04	0.02		0.06	0.34			0.25		0.03
v/c Ratio	0.72	0.16	0.14	0.14	0.40	0.53	0.84	0.67		0.62	0.95	0.06
Uniform Delay, d1	35.8	39.2	31.2	50.4	55.9	48.2	35.2	33.5		22.4	38.6	12.1
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	5.6	0.2	0.1	0.3	1.2	1.7	26.5	1.3		4.2	20.6	0.0
Delay (s)	41.4	39.3	31.3	50.8	57.2	49.9	61.7	34.8		26.6	59.3	12.2
Level of Service	D	D	C	D	E	D	E	C		C	E	B
Approach Delay (s)		37.6			51.7			38.8			48.7	
Approach LOS		D			D			D			D	

Intersection Summary				
HCM 2000 Control Delay	43.2	HCM 2000 Level of Service	D	
HCM 2000 Volume to Capacity ratio	0.89			
Actuated Cycle Length (s)	135.4	Sum of lost time (s)	30.0	
Intersection Capacity Utilization	87.3%	ICU Level of Service	E	
Analysis Period (min)	15			

c Critical Lane Group

Background Traffic WITH IMPROVEMENTS Synchro 10 Light Report
Timing Plan: PM Peak Page 3



HCM Signalized Intersection Capacity Analysis
6: South Shore Blvd & Pierson Road 05/07/2023

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	355	107	228	39	88	228	170	934	35	168	727	114
Future Volume (vph)	355	107	228	39	88	228	170	934	35	168	727	114
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	0.95			1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1770	1863	1583	1770	1863	1583	1770	3520		1770	1863	1583
Flt Permitted	0.45	1.00	1.00	0.68	1.00	1.00	0.07	1.00		0.15	1.00	1.00
Satd. Flow (perm)	830	1863	1583	1275	1863	1583	123	3520		283	1863	1583
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	374	113	240	41	93	240	179	983	37	177	765	120
RTOR Reduction (vph)	0	0	164	0	0	71	0	2	0	0	0	46
Lane Group Flow (vph)	374	113	76	41	93	169	179	1018	0	177	765	74
Turn Type	pm+pt	NA	pm+ov	pm+pt	NA	pm+ov	pm+pt	NA		pm+pt	NA	pm+ov
Protected Phases	7	4	1	3	8	5	1	6		5	2	7
Permitted Phases	4		4	8		8	6			2		2
Actuated Green, G (s)	47.2	32.7	44.8	20.7	14.2	26.6	72.7	60.6		73.3	60.9	85.9
Effective Green, g (s)	47.2	32.7	44.8	20.7	14.2	26.6	72.7	60.6		73.3	60.9	85.9
Actuated g/C Ratio	0.33	0.23	0.32	0.15	0.10	0.19	0.51	0.43		0.52	0.43	0.60
Clearance Time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	440	428	498	208	186	296	203	1500		275	797	956
v/s Ratio Prot	c0.15	0.06	0.01	0.01	0.05	0.05	c0.08	0.29		0.06	c0.41	0.01
v/s Ratio Perm	c0.13		0.03	0.02		0.06	0.38			0.28		0.03
v/c Ratio	0.85	0.26	0.15	0.20	0.50	0.57	0.88	0.68		0.64	0.96	0.08
Uniform Delay, d1	40.7	44.9	35.0	53.1	60.6	52.6	41.1	32.9		22.7	39.5	11.7
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	14.2	0.3	0.1	0.5	2.1	2.7	33.0	1.2		5.1	22.3	0.0
Delay (s)	54.9	45.2	35.2	53.6	62.7	55.3	74.1	34.2		27.8	61.7	11.7
Level of Service	D	D	D	D	E	E	E	C		C	E	B
Approach Delay (s)		46.9			57.0			40.1			50.4	
Approach LOS		D			E			D			D	

Intersection Summary				
HCM 2000 Control Delay	46.7	HCM 2000 Level of Service	D	
HCM 2000 Volume to Capacity ratio	0.95			
Actuated Cycle Length (s)	142.2	Sum of lost time (s)	30.0	
Intersection Capacity Utilization	92.3%	ICU Level of Service	F	
Analysis Period (min)	15			

c Critical Lane Group

Total Traffic WITH IMPROVEMENTS Synchro 10 Light Report
Timing Plan: PM Peak Page 3

A preliminary capacity analysis was conducted to compare the applicant results in comparison to an estimate of volumes by the Peer Review Approach. The comparison reveals that EBL, WBT, and NBL movements would be experiencing higher delays with failing LOS and saturated capacity conditions.

HCM Signalized Intersection Capacity Analysis
6: South Shore Blvd & Pierson Road 05/07/2023

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	355	107	228	39	88	228	170	934	35	168	727	114
Future Volume (vph)	355	107	228	39	88	228	170	934	35	168	727	114
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.95		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1770	1863	1583	1770	1863	1583	1770	3520		1770	1863	1583
Flt Permitted	0.45	1.00	1.00	0.68	1.00	1.00	0.07	1.00		0.15	1.00	1.00
Satd. Flow (perm)	830	1863	1583	1275	1863	1583	123	3520		283	1863	1583
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	374	113	240	41	93	240	179	983	37	177	765	120
RTOR Reduction (vph)	0	0	164	0	0	71	0	2	0	0	0	46
Lane Group Flow (vph)	374	113	76	41	93	169	179	1018	0	177	765	74
Turn Type	pm+pt	NA	pm+ov	pm+pt	NA	pm+ov	pm+pt	NA		pm+pt	NA	pm+ov
Protected Phases	7	4	1	3	8	5	1	6		5	2	7
Permitted Phases	4		4	8		8	6			2		2
Actuated Green, G (s)	47.2	32.7	44.8	20.7	14.2	26.6	72.7	60.6		73.3	60.9	85.9
Effective Green, g (s)	47.2	32.7	44.8	20.7	14.2	26.6	72.7	60.6		73.3	60.9	85.9
Actuated g/C Ratio	0.33	0.23	0.32	0.15	0.10	0.19	0.51	0.43		0.52	0.43	0.60
Clearance Time (s)	8.0	8.0	7.0	8.0	8.0	7.0	7.0	7.0		7.0	7.0	8.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	440	428	498	208	186	296	203	1500		275	797	956
v/s Ratio Prot	c0.15	0.06	0.01	0.01	0.05	0.05	c0.08	0.29		0.06	c0.41	0.01
v/s Ratio Perm	c0.13		0.03	0.02		0.06	0.38			0.28		0.03
v/c Ratio	0.85	0.26	0.15	0.20	0.50	0.57	0.88	0.68		0.64	0.96	0.08
Uniform Delay, d1	40.7	44.9	35.0	53.1	60.6	52.6	41.1	32.9		22.7	39.5	11.7
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	14.2	0.3	0.1	0.5	2.1	2.7	33.0	1.2		5.1	22.3	0.0
Delay (s)	54.9	45.2	35.2	53.6	62.7	55.3	74.1	34.2		27.8	61.7	11.7
Level of Service	D	D	D	D	E	E	E	C		C	E	B
Approach Delay (s)		46.9			57.0			40.1			50.4	
Approach LOS		D			E			D			D	

Intersection Summary			
HCM 2000 Control Delay	46.7	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.95		
Actuated Cycle Length (s)	142.2	Sum of lost time (s)	30.0
Intersection Capacity Utilization	92.3%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Total Traffic WITH IMPROVEMENTS
Timing Plan: PM Peak
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HCM Signalized Intersection Capacity Analysis
1: South Shore Boulevard & Pierson Road 10/02/2023

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	355	108	228	58	107	228	170	935	36	168	743	132
Future Volume (vph)	355	108	228	58	107	228	170	935	36	168	743	132
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	7.0	8.0	7.0	8.0	7.0	7.0	7.0	7.0		7.0	7.0	7.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.95		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1770	1863	1583	1770	1863	1583	1770	3519		1770	1863	1583
Flt Permitted	0.40	1.00	1.00	0.68	1.00	1.00	0.06	1.00		0.16	1.00	1.00
Satd. Flow (perm)	748	1863	1583	1273	1863	1583	118	3519		298	1863	1583
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	374	114	240	61	113	240	179	984	38	177	782	139
RTOR Reduction (vph)	0	0	167	0	0	71	0	2	0	0	0	83
Lane Group Flow (vph)	374	114	73	61	113	169	179	1020	0	177	782	86
Turn Type	pm+pt	NA	pm+ov	pm+pt	NA	pm+ov	pm+pt	NA		pm+pt	NA	pm+ov
Protected Phases	7	4	1	3	8	5	1	6		5	2	7
Permitted Phases	4		4	8		8	6			2		2
Actuated Green, G (s)	46.5	31.7	43.5	21.6	14.8	26.4	74.7	62.9		74.3	62.7	88.4
Effective Green, g (s)	46.5	31.7	43.5	21.6	14.8	26.4	74.7	62.9		74.3	62.7	88.4
Actuated g/C Ratio	0.33	0.22	0.30	0.15	0.10	0.18	0.52	0.44		0.52	0.44	0.62
Clearance Time (s)	7.0	8.0	7.0	8.0	7.0	7.0	7.0	7.0		7.0	7.0	7.0
Vehicle Extension (s)	2.0	2.0	2.0	2.0	2.0	2.0	2.0	4.0		2.0	4.0	2.0
Lane Grp Cap (vph)	426	412	481	215	192	369	197	1547		274	816	1056
v/s Ratio Prot	c0.16	0.06	0.01	0.01	0.06	0.04	c0.07	0.29		0.05	c0.42	0.01
v/s Ratio Perm	c0.13		0.03	0.03		0.07	0.40			0.28		0.04
v/c Ratio	0.88	0.28	0.15	0.28	0.59	0.46	0.91	0.66		0.65	0.96	0.08
Uniform Delay, d1	41.7	46.1	36.3	53.4	61.2	51.9	42.3	31.6		22.2	38.9	11.0
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	17.6	0.1	0.1	0.3	3.0	0.3	38.5	1.1		3.9	21.8	0.0
Delay (s)	59.3	46.3	36.3	53.6	64.1	52.3	80.8	32.7		26.1	60.7	11.0
Level of Service	E	D	D	D	E	D	F	C		C	E	B
Approach Delay (s)		49.7			55.7			39.9			48.8	
Approach LOS		D			E			D			D	

Intersection Summary			
HCM 2000 Control Delay	46.7	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.97		
Actuated Cycle Length (s)	143.0	Sum of lost time (s)	30.0
Intersection Capacity Utilization	93.2%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Total Traffic WITH IMPROVEMENTS (Peer Review)
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- In the case of capacity analyses conducted for the project driveways along Pierson Road as part of the Wellington South; those capacity analyses transposed driveway volumes collected in 2017 and 2013 as previously mentioned. Those counts do not reflect the actual traffic conditions of the driveways, since modifications to the PBIEC facility occurred between 2016 and 2023. Therefore, the existing driveway volumes shown in Figure 2 cannot be used in the capacity analyses. The images below show the outdated driveway counts and aerials displaying differences between 2016 and 2023 showing additions/modifications to the PBIEC facility.

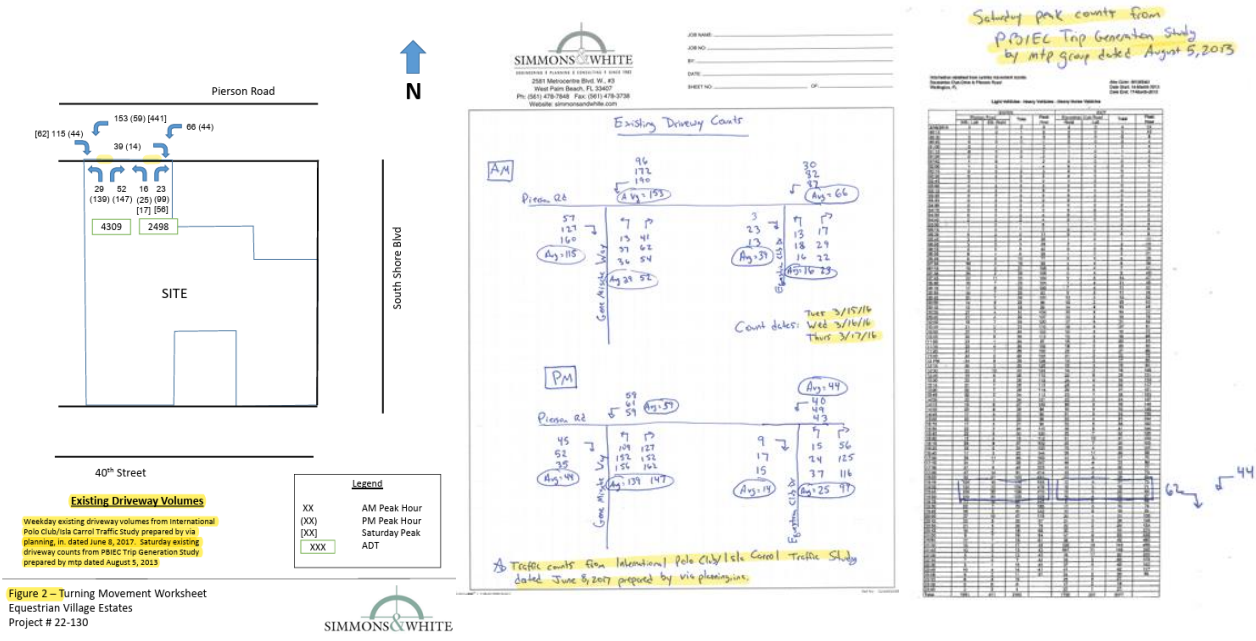
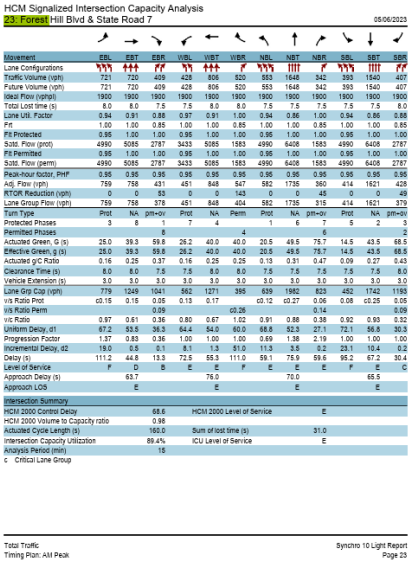


Figure 2 – Turning Movement Worksheet
Equestrian Village Estates
Project # 22-130

2016 Aerial View of BPIEC

2023 Aerial View of BPIEC

- The applicant TIS considers that the project has “minimum impact” and implying that key intersections are operating with “background” deficiencies that will be required substantial improvements in order to reach acceptable LOS. This is contradictory as for example in the case of the southbound left-turn movement at the intersection of Forest Hill Boulevard and SR 7 which show failures under the future conditions with triple left-turns (LOS F and 160.5 sec of delay) will continues failing (LOS F and 80.4 sec of delay) under the total future conditions even with the implementation of a quadruple left-turn. Therefore, any level of additional intensity to those intersections should be considered impactful and to be coordinated with the Florida Department of Transportation (FDOT).



HCM Signalized Intersection Capacity Analysis
23: Forest Hill Blvd & State Road 7
05/06/2023

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	721	720	409	428	806	520	553	1648	342	393	1540	407
Future Volume (vph)	721	720	409	428	806	520	553	1648	342	393	1540	407
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	8.0	8.0	7.5	7.5	8.0	8.0	7.5	7.5	7.5	7.5	7.5	8.0
Lane Util. Factor	0.94	0.91	0.88	0.97	0.91	1.00	0.94	0.86	1.00	0.94	0.86	0.88
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	4990	5085	2787	3433	5085	1583	4990	6408	1583	4990	6408	2787
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	4990	5085	2787	3433	5085	1583	4990	6408	1583	4990	6408	2787
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	759	758	431	451	848	547	582	1735	360	414	1621	428
RTOR Reduction (vph)	0	0	53	0	0	143	0	0	45	0	0	49
Lane Group Flow (vph)	759	758	378	451	848	404	582	1735	315	414	1621	379
Turn Type	Prot	NA	pm+ov	Prot	NA	Perm	Prot	NA	pm+ov	Prot	NA	pm+ov
Protected Phases	3	8	1	7	4		1	6	7	5	2	3
Permitted Phases			8			4			6			2
Actuated Green, G (s)	25.0	39.3	59.8	26.2	40.0	40.0	20.5	49.5	75.7	14.5	43.5	68.5
Effective Green, g (s)	25.0	39.3	59.8	26.2	40.0	40.0	20.5	49.5	75.7	14.5	43.5	68.5
Actuated g/C Ratio	0.16	0.25	0.37	0.16	0.25	0.25	0.13	0.31	0.47	0.09	0.27	0.43
Clearance Time (s)	8.0	8.0	7.5	7.5	8.0	8.0	7.5	7.5	7.5	7.5	7.5	8.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	779	1249	1041	562	1271	395	639	1982	823	452	1742	1193
v/s Ratio Prot	c0.15	0.15	0.05	0.13	0.17		c0.12	c0.27	0.06	0.08	c0.25	0.05
v/s Ratio Perm			0.09			c0.26			0.14			0.09
v/c Ratio	0.97	0.61	0.36	0.80	0.67	1.02	0.91	0.88	0.38	0.92	0.93	0.32
Uniform Delay, d1	67.2	53.5	36.3	64.4	54.0	60.0	66.8	52.3	27.1	72.1	56.8	30.3
Progression Factor	1.37	0.83	0.36	1.00	1.00	1.00	0.69	1.38	2.19	1.00	1.00	1.00
Incremental Delay, d2	19.0	0.5	0.1	8.1	1.3	51.0	11.3	3.5	0.2	23.1	10.4	0.2
Delay (s)	111.2	44.8	13.3	72.5	55.3	111.0	59.1	75.9	59.6	95.2	67.2	30.4
Level of Service	F	D	B	E	E	F	E	E	E	F	E	C
Approach Delay (s)		63.7			76.0			70.0			65.5	
Approach LOS		E			E			E			E	

Intersection Summary			
HCM 2000 Control Delay	68.6	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.98		
Actuated Cycle Length (s)	160.0	Sum of lost time (s)	31.0
Intersection Capacity Utilization	89.4%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Total Traffic
Timing Plan: AM Peak

Synchro 10 Light Report
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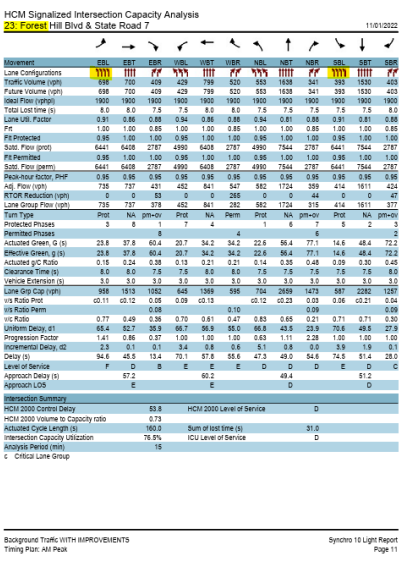


HCM Signalized Intersection Capacity Analysis
23: Forest Hill Blvd & State Road 7
11/01/2022

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	698	700	409	429	799	520	553	1638	341	393	1530	403
Future Volume (vph)	698	700	409	429	799	520	553	1638	341	393	1530	403
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	8.0	8.0	7.5	7.5	8.0	8.0	7.5	7.5	7.5	7.5	7.5	8.0
Lane Util. Factor	0.91	0.86	0.88	0.94	0.86	0.86	0.94	0.81	0.88	0.91	0.81	0.88
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	6441	6408	2787	4990	6408	2787	4990	7544	2787	6441	7544	2787
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	6441	6408	2787	4990	6408	2787	4990	7544	2787	6441	7544	2787
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	735	737	431	452	841	547	582	1724	359	414	1611	424
RTOR Reduction (vph)	0	0	53	0	0	285	0	0	44	0	0	47
Lane Group Flow (vph)	735	737	378	452	841	282	582	1724	315	414	1611	377
Turn Type	Prot	NA	pm+ov	Prot	NA	Perm	Prot	NA	pm+ov	Prot	NA	pm+ov
Protected Phases	3	8	1	7	4		1	6	7	5	2	3
Permitted Phases			8			4			6			2
Actuated Green, G (s)	23.8	37.8	60.4	20.7	34.2	34.2	22.6	56.4	77.1	14.6	48.4	72.2
Effective Green, g (s)	23.8	37.8	60.4	20.7	34.2	34.2	22.6	56.4	77.1	14.6	48.4	72.2
Actuated g/C Ratio	0.15	0.24	0.38	0.13	0.21	0.21	0.14	0.35	0.48	0.09	0.30	0.45
Clearance Time (s)	8.0	8.0	7.5	7.5	8.0	8.0	7.5	7.5	7.5	7.5	7.5	8.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Grp Cap (vph)	958	1513	1052	645	1369	595	704	2659	1473	587	2282	1257
v/s Ratio Prot	c0.11	c0.12	0.05	0.09	c0.13		c0.12	c0.23	0.03	0.06	c0.21	0.04
v/s Ratio Perm			0.08			0.10			0.09			0.09
v/c Ratio	0.77	0.49	0.36	0.70	0.61	0.47	0.83	0.65	0.21	0.71	0.71	0.30
Uniform Delay, d1	65.4	52.7	35.9	66.7	56.9	55.0	66.8	43.5	23.9	70.6	49.5	27.9
Progression Factor	1.41	0.86	0.37	1.00	1.00	1.00	0.63	1.11	2.28	1.00	1.00	1.00
Incremental Delay, d2	2.3	0.1	0.1	3.4	0.8	0.6	5.1	0.8	0.0	3.9	1.9	0.1
Delay (s)	94.6	45.5	13.4	70.1	57.8	55.6	47.3	49.0	54.6	74.5	51.4	28.0
Level of Service	F	D	B	E	E	E	D	D	D	E	D	C
Approach Delay (s)		57.2			60.2			49.4			51.2	
Approach LOS		E			E			D			D	

Intersection Summary			
HCM 2000 Control Delay	53.8	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.73		
Actuated Cycle Length (s)	160.0	Sum of lost time (s)	31.0
Intersection Capacity Utilization	76.5%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Background Traffic WITH IMPROVEMENTS
Timing Plan: AM Peak

Synchro 10 Light Report
Page 11

2.6 ROADWAY SAFETY

Wellington North

A cursory review of historical crash data for the intersection of Pierson Road and South Shore Boulevard revealed that the intersection is currently experiencing concerning safety issues.

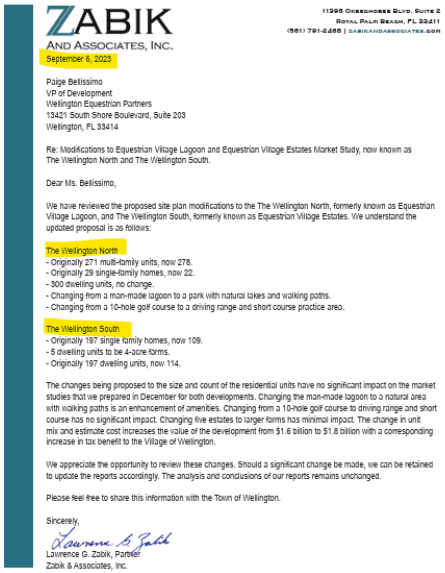
A total of 22 crashes were reported in the past three years (2021 to July 2023). Also, crash data show an increasing trend in the number of crashes. Therefore, roadway safety in the vicinity of the project is an aspect that should be included but was not discussed as part of the applicant's TIS reports as with since additional traffic intensities will most likely result in an increase in crashes.

Wellington South

The site plan shows gate entrances are to provide access to the residential community. However, the report did not perform a queuing analysis to determine if there is enough staking distance for queued vehicles, thus queues do not spill back on the main roads creating traffic congestion.

2.7 PROPOSED SITE MOFIFICATIONS TO HOUSING AND AMENITIES

On a recent communication letter, the applicant is proposing to modify the site plans for both Wellington North and South developments as shown below.



ZABIK
AND ASSOCIATES, INC.

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September 6, 2023

Paige Belissimo
VP of Development
Wellington Equestrian Partners
13421 South Shore Boulevard, Suite 203
Wellington, FL 33414

Re: Modifications to Equestrian Village Lagoon and Equestrian Village Estates Market Study, now known as The Wellington North and The Wellington South.

Dear Ms. Belissimo,

We have reviewed the proposed site plan modifications to the The Wellington North, formerly known as Equestrian Village Lagoon, and The Wellington South, formerly known as Equestrian Village Estates. We understand the updated proposal is as follows:

The Wellington North
- Originally 271 multi-family units, now 278.
- Originally 29 single-family homes, now 22.
- 300 dwelling units, no change.
- Changing from a man-made lagoon to a park with natural lakes and walking paths.
- Changing from a 10-hole golf course to a driving range and short course practice area.

The Wellington South
- Originally 197 single family homes, now 109.
- 5 dwelling units to be 4-acre farms.
- Originally 197 dwelling units, now 114.

The changes being proposed to the size and count of the residential units have no significant impact on the market studies that we prepared in December for both developments. Changing the man-made lagoon to a natural area with walking paths is an enhancement of amenities. Changing from a 10-hole golf course to driving range and short course has no significant impact. Changing five estates to larger farms has minimal impact. The change in unit mix and estimate cost increases the value of the development from $1.6 billion to $1.8 billion with a corresponding increase in tax benefit to the Village of Wellington.

We appreciate the opportunity to review these changes. Should a significant change be made, we can be retained to update the reports accordingly. The analysis and conclusions of our reports remains unchanged.

Please feel free to share this information with the Town of Wellington.

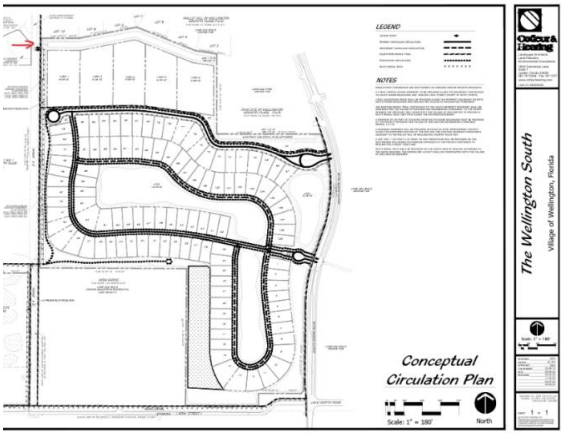
Sincerely,

Lawrence G. Zabik, Partner
Zabik & Associates, Inc.

Based on the information included in the letter, the Peer Review identified the following issues:

- The proposed modifications will involve changes to the land use intensities and access connections. If the proposed modifications are to be approved, the applicant is expected to provide a revised traffic impact study for each of the developments to reflect the proposed modifications, regardless of the magnitude of the proposed changes.

- Although the site plan for the Wellington South development shows a modification and a reduction in number of units in the project the critical aspect of the application is the intensity expected at the showground parcel with no proposed improvements provided to address turn traffic from spectators into that site during special events.



3. CONCLUSION

The applicant TIS reports provided by Simmons & White for the Wellington North & South developments do not meet Traffic Performance Standards for Palm Beach County or the Village of Wellington.

We respectfully disagree with the conclusions of both reports. The review identified deficiencies related to 1) adequacy of the traffic data, 2) applicability of trip generation rates/equations and assumptions, 3) accuracy of growth rate calculations, 4) accuracy of trip distribution and assignment, 5) misleading capacity analysis results, 6) lack of constructability verification of proposed improvements and 7) undermining traffic impacts and project significance.

Therefore, the mentioned applicant Traffic Impact Statements are not to be considered acceptable, and the projects should not be approved based on the information provided herein.

Covelli
Design
Associates, Inc.

Urban Planning ◆ Landscape Architecture

Maria H. Ruiz
Kasowitz Benson Torres LLP
1441 Brickell Avenue
Suite 1420
Miami, Florida 33131

October 3, 2023

Re: Wellington Planning, Zoning, and Adjustment Board Ordinance NO. 2023-04 (PZ-0298), Resolution No. R2023-02 (PZ-0299), Ordinance No. 2023-01 (PZ-0300), Ordinance No. 2023-02 (PZ-0301), and Resolution No. R2023-01 (PZ-0302)

Dear Ms. Ruiz,

Please see attached the reports which are an evaluation of the proposed project documents and the staff reports for the Wellington North and Wellington South applications. The proposed development plans, documents and staff report were evaluated in reference to compliance with the Goals, Policies, and Objectives of the Comprehensive Plan and the Land Development Regulations. The attached reports are a summary of my findings and professional opinion as to compliance.

Sincerely,
Covelli Design Associates

Michael Covelli, AICP/ ASLA

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The Wellington North Overview

The Wellington North and South were submitted as two separate applications with specific plans for each site. However, the projects are linked in many ways which becomes very evident when reviewing the justification statements submitted with each application. The justifications for relocating the North use to the South project is hardly a justification but one site is dependent on actions in the other in order to justify the creation of both projects. The two sites should have been evaluated as one project if they are truly dependent on each other successfully moving the project forward.

The Wellington North application proposes the following:

Ordinance No. 2023-01 - Comprehensive Plan Amendments (Petition 2022-0002-CPA):

- To amend the Future Land Use Map (FLUM) to remove Equestrian Village and White Birch Farms properties, totaling 96.29 acres, from the Equestrian Preserve Area (Exhibit B - Proposed FLUM); and

- To amend the Bridle Path Map (Exhibit C), Pedestrian Pathway Network Map (Exhibit D), the Multi-Modal Pathways Map (Exhibit E), and the Bicycle Lanes Map (Exhibit F) within the Comprehensive Plan by deleting the Equestrian Village property identification as a "venue" and amending the Equestrian Preserve Area boundary; and

- To amend the FLUM designation of the Equestrian Village and White Birch Farms properties, totaling 96.29 acres, from Equestrian Commercial Recreation (ECR) to Residential E (3.0 du/ac). 250 units will be within the parcels.

- The amendment of the FLUM Designation of the Coach House property, totaling 5.58 acres, from Residential F (8.01 du/ac – 12.0 du/ac) to Residential E (3.0 du/ac) has been withdrawn from the application. The vested 50 units remain in the parcel.

Ordinance No. 2023-02 - Rezoning (Petition 2022-0001-REZ) – *Action must be consistent with Comprehensive Plan*:

- To amend Wellington's Official Zoning Map to amend the zoning designation of Equestrian Village and White Birch Farms, totaling 96.29 acres, from Equestrian Overlay Zoning District/Planned Unit Development (EOZD/PUD) to PUD and modify the boundary of the EOZD consistent with the Equestrian Preserve Area (Exhibit H – Proposed Official Zoning Map); and

- To remove Equestrian Village and White Birch Farms from Subarea D of the EOZD.

Resolution No. 2023-01 – Master Plan Amendment (Petition 2022-0004-MPA):

- To amend the Wellington PUD Master Plan (Exhibit J – Proposed Wellington PUD Master Plan):
  - To assign 250 dwelling units - 22 single family, 28 single family attached, and 200 multi-family condo.
  - To approve The Wellington North Project Standards Manual and
  - To revised Conditions of Approval.

The Wellington North site currently is designated in the comprehensive plan as a Major Equine Destination which is located north of Pierson Road and East of South Shore Boulevard. Both roadways are shown on the Roadway Classification Map within the Mobility Element of the Comprehensive Plan as Minor Collectors. The existing equestrian facility has been properly located as per the Goals, Objectives, and Policies of the Comprehensive plan. The Town of Wellington is very young as compared to the other older cities within the county. The Town was incorporated after many growth management acts and planning tools were mandated and implemented by the state and county. Town founders had a lot of historical knowledge both good and bad to evaluate in preparing the codes that would guide the growth of the city. Judging from the success resulting in international recognition the Town has received, one can say Wellington got it right. The Comprehensive Plan is a vital tool for evaluating proposed development proposals to ensure the vision of the plan is maintained. The existing North use is appropriate because it is in conformity with the Comprehensive Plan vision. It is located at the intersection of two collector roads that have adequate capacity and provisions for expansion to increase the capacity in the future. There is a commercial node to the east that can provide commercial uses to support the existing use of the property. This has been memorialized in the Mobility section of the Comprehensive plan.

The Staff has ignored the following policies in evaluating the requested action of the applicant which should have been the main focus in determining if removal of the existing equine use was appropriate rather than citing other policies that seem to make the proposed use "fit" within the code. The Policy LU&CD 1.3.3 is as follows:

Policy LU&CD 1.3.3 - Equestrian Commercial Recreation Land Use
Apply the Equestrian Commercial Recreation (ECR) land use designation to accommodate commercially-oriented uses, such as arenas/stadiums, show ring facilities, and commercial stables and equestrian-oriented commercial uses, such as veterinary clinics, feed stores, tack shops. Equestrian Commercial Recreation land use is limited to the Equestrian Preserve A rea located with frontage on an arterial or collector roadway and limited to a maximum intensity of 0 10 FAR.

The most important point in this Policy 13.3 is the location of an equestrian use must have frontage on an arterial or collector road. As stated above, the subject site has frontage on two collectors which makes the existing equestrian use the appropriate use for this location. Keep in mind the relocation of the equestrian use is proposed to be relocated to The Wellington South which does not have frontage on an arterial or collector on any frontage of the parcel. Relocating the equestrian use not only removes the equestrian use from an ideal location that is in conformity with the Comprehensive Plan, but it also moves the use to an area that is not in conformity with the Comprehensive Plan a per the policy stated above.

Additionally the following Policy should have also been evaluated with regard to removing all zoning and land use designations related to the EPA and the EOZD. The justification for removing the equestrian use does not address the preserving the characteristics of the EPA/EOZD. If the proposed project would be approved,

the resulting condition would reduce the area of the EPA/EOZD even though justification is based on the claim there may be more area in other areas within Wellington at a future date. Regardless of what may be in the future, the Policy should have been given consideration solely related to the subject parcel as to if it is appropriate to remove the use rather than trying to justify the proposed relocation of the use as being appropriate. Keep in mind the equestrian us is being relocated to a parcel that is not located adjacent to a collector road as per the Roadway Classification Map within the Mobility Element of the Comprehensive Plan The policy is as follows:

Policy EQ 1.1.1 - Equestrian Overlay Zoning District: Implement the Equestrian Overlay Zoning District (EOZD) to preserve the characteristics of the EPA. The intent of the EOZD is to: (1) Preserve the equestrian lifestyles and large lot, equestrian farms which exist in the EOZD; (2) Establish site development regulations that recognize the characteristics of the equestrian lifestyle and development pattern while maintaining the overall residential density of the EPA; and (3) Permit limited commercial uses as defined in the land development regulations, which support the equestrian industry, within properties approved as planned developments or within commercial recreation land uses.

Staff did not utilize Policy LU&CD 1.3.3 and Policy EQ 1.1.1 in making a determination if it was appropriate to remove the equestrian use from the area. They also did not consider these policies in determining if relocating the use to the Wellington South development was in compliance with these policies. Staff failed to recognize and evaluate the applicable section in the LDRs as well. Rather they utilized Goals, Objectives, and Policies related to the proposed development plan to justify the appropriateness of the proposed development plan.

Staff's North Report focused on the justification of the proposed Comprehensive Plan Amendments and seemed to utilize the following goals, objectives, and policies to prepare a positive opinion as to compliance with all associated with the proposed revisions to the Wellington Comprehensive Plan: The policies utilized to justify compliance in the staff report are as follows:

> **Policy LU&CD 1.1.1 - Compatible with Existing Conditions: New development shall be compatible with existing natural and built conditions. Future growth & patterns shall take into consideration topography, soil, vegetation, water quality and quantity, and other natural resources of the land. Future growth patterns shall also respect and protect the character and quality of the surrounding built environment. [Land Use and Community Design Element]**

Staff only looked to the north and east with regards to existing uses for compatibility for the proposed residential development. However they did not look to the west or south where the south is of the same designation and the west is designated for commercial use that is needed to support the equestrian use. Staff assumed compatibility by adding more residential where residential exists only looking to the north and east. Much of the

justification for compatibility was based on the proposed reduction in the maximum number of units that could be built not the use and squaring off the EPA/EOZD at Pierson Road because the site was north of Pierson Road stating it was on the edge of the EPA/EOZD boundary. In looking at the Future Land Use Map, one will see there are a number of parcels designated as Equestrian Commercial Recreation. These designated areas are all adjacent to an edge of the EPA/EOZD so justification for removal from the EPA/EOZD because being by an edge of the designation is not acceptable. Staff made a statement that if approved there will only be 22.23 acres of land left north of Pierson Road within the EOZD. This is a misleading statement that minimized the effect of removing the subject site as there are two very large parcels west of the subject site that extend well north of Pierson Road that include Sub-Areas B and E of the Equestrian Preserve. The impact was further minimized by comparing the subject site to the overall EPA saying the subject site is 1% of the overall area. Staff did not focus on the intent of the Policy and did not comment on the overall development pattern and character of the area other than focusing on the subject site being at the edge of the EPA/EOZD. The edge is just as critical (if not more critical) to the future preservation of the EPA/ EOZD. Using the edge justification can encourage the new edge to be the next area that is removed. Staff also did not comment on the commercial node west South Shore. The comprehensive plan distributed commercial nodes throughout the Town at major intersections so as to minimize impacts to residential neighborhoods. The loss of the non- residential use on the east side South Shore creates an inconsistency with the overall positioning of non-residential nodes as dispersed within the comprehensive land use plan.

> **Policy LU&CD 1.2.3 - Apply the Medium Density Residential land use designation (Residential Land Use D, E, or F) to land that is or will be developed for a wide range of housing types, including but not limited to attached, single-family and multi-family housing. The Medium Density Residential land use designations are designed for densities ranging from gross 5 to 12 units per acre and are eligible for additional density through a reinvestment bonus program up to a maximum of two times the maximum units per acre for the respective land use designation. [Land Use and Community Design Element]**

Staff found the subject proposal to be compatible because the proposal was to reduce the number of units from the maximum permitted by Residential E yielding 800 units. It is unclear as to why staff didn't recommend a lesser land use designation if the proposed development is only constructing 300 units. 300 units on 101.87 acres yield a density of 2.94 units per acre.

> **Policy Parks and Recreations ("PR") 1.1 - Provide a superior amount of recreational land to serve the population; at least 10 acres or recreational land per 1,000 residents is Wellington's target. Recreational land may comprise land for active or passive recreational use.**

Staff justified compliance with this policy utilizing The Wellington South proposal as the transfer of the area and use to that site. However, with no specific site plan for Pod F there is no guarantee as to what uses will ultimately be within the South project. Using this shift in use to determine compliance with this policy is flawed in that the shift of the equestrian use is not in conformity with Policy LU&CD 1.3.3 which requires the equestrian use to front on a collector or arterial road as shown on the Roadway Classification Map within the Mobility Element of the Comprehensive Plan. These roadway classifications do not exist within Wellington South and the Mobility Element of the Comprehensive plan does not provide for any roadway expansion into the South area in the future per the Mobility Element. Therefore, the project is not in compliance with this policy. Staff stated in a public hearing the roadways functioned as collectors and therefore were compatible. However, the roadways are not shown on the Roadway Classification Map within the Mobility Element which should be the standard utilized for evaluating compliance.

> **Policy CRS 1.1.2 – Transportation Air Quality Impacts: Reduce transportation air quality impacts by increasing non-automobile travel by improving connectivity and safety sidewalks, bicycle lanes, and multi-use pathways. [Conservation Element]**

Staff referenced consolidation of the equestrian venue as a way to reduce traffic, provide a diversity in housing types, promote multimodal alternatives, and reduce horse crossings. However, staff did not take into consideration that consolidating the equestrian venue will increase the need to widening of South Shore to four lanes which will make crossing the road with horses very dangerous and difficult. If the North equestrian facility were to remain in the current location the equestrian uses would be spread out and the intensification of traffic in one area would not occur therefore removing the need to widen roadways to four lanes. Information related to horse safety and where and when horses will cross the streets appears to be lacking practical knowledge as evidenced by the board discussion at the EPB related to how the different venues function and where the horses come from to participate. If North is maintained as an equestrian venue, horse crossings will be kept to a minimum because of the nature of the use which does not utilize crossings as per testimony given. The roadway classification and future widening has been well thought out in the Comprehensive Plan by creating commercial /non-residential nodes at major intersections, and not extend multi lane roadways into the equestrian farm areas. Shifting the North uses to the South development will create a situation contrary to the vision of the comprehensive plan.

Staff addressed the policies, objectives, and goals in the staff report as related to the justification of the proposed development. Staff did fail to address some key policies as related to analyzing the appropriate use for the subject site. Staff also failed to analyze the Applicant's comprehensive plan amendments as related to compliance with the Land Development Regulations. The applicable LDR section is as follows:

LDR Sec. 6.1.3(A) - What is the Equestrian Overlay Zoning District? Wellington's Council created the Equestrian Overlay Zoning District (EOZD) in 2003 in order to regulate development and activities within Wellington's Equestrian Preserve Area (EPA). The EOZD is the zoning regulatory framework that protects the community's character by regulating land uses and development. The purpose and intent of the EOZD regulations are the following: (1) Preserve, maintain and enhance Wellington's EPA as identified in the Comprehensive Plan; (2) Preserve, maintain and enhance the equestrian area that is home to equestrian farms, competition venues, and the equestrian lifestyle in Wellington; and (3) Identify and encourage land uses and development patterns that are supportive of the equestrian character and lifestyle with in the EPA. By identifying and encouraging specific uses that are consistent with the character of the equestrian community, Wellington can sustain its equestrian industry. The EOZD is consistent with the Residential A, Residential B, Residential C, and Equestrian Commercial Recreation Future Land Use Map designations of the Land Use Element of the Comprehensive Plan.

As stated previously the staff report focused on addressing the justification of the proposed project and does not focus on the existing use and determining the feasibility of replacing that use. The staff report does not consider preserving land within the EPA/EOZD as an alternative and made statements that minimized the impact of removing land from the EPA/EOZD by the proposed application. Staff made statements that were contradicted by board testimony related to the existing use and how the facility functions, horse crossings, the amount of EPA/EOZD land north of Pierson Road, and the deletion of bridal paths. The above LDR section is a code section for preservation of equestrian lands. Changing the use from equestrian to residential is not preserving the equestrian use or designation. Relocation to South should not be an acceptable justification as there is no guarantee as to the extent of what will actually be built or how much will be utilized in the South development especially since the relocation would be to an area that is not inconformity due to lack of frontage on a collector roadway per the Roadway Classification Map within the Comprehensive Plan. An equestrian venue per the above mentioned policies is required to be fronting on a collector or an arterial. Neither roadway classification exists in South even though staff has stated it functions as a collector but is not designated within Roadway Classification map. No provision has been planned to provide such infrastructure within the Future Roadway Map within the Mobility Element. Additionally adequate right of way does not exist to provide an arterial roadway in the future.

The approval of the request to change North to a residential use if it were to be approved, would mean the loss of the equestrian land which is contrary to the above LDR section, City Charter, and Comprehensive Plan policies. A more thorough and adequate evaluation related to preservation should be performed as per the above Policies and LDR section as well as per the policies listed below.

Policy LU&CO 2.6.1 - Equestrian Preserve Area (EPA)
The Equestrian Preserve Area is established on the Land Use Map as a specific boundary delineating the equestrian community to protect and preserve the equestrian lifestyle.

Policy LU&CO 2.6.2 - Equestrian Overlay Zoning District (EOZO)
The Equestrian Overlay Zoning District (EOZD) regulates the development pattern and standards for the Equestrian Preserve Area and defines the density and intensity, requires the preservation of green space, establishes an equestrian circulation system including safe crossings of roadways by equestrians, and allows for certain land uses not permitted in other areas of Wellington.

The Wellington South Overview

The Wellington North and South were submitted as two separate applications with specific plans for each site. However, the projects are linked in many ways which becomes very evident when reviewing the justification statements submitted with each application. The two sites should have been evaluated as one project (or conditioned on each other at the very least) as the justification for creating the Equestrian Commercial Recreation area in the Wellington South proposal is based on the North being removed from the ECR/EOZD allowing the existing dressage areas to be moved to a new facility.

South Master Plan Amendments

Resolution No. R2023-02 Wellington CountryPlace PUD Master Plan Amendments (Petition 2022-0005-MPA; Exhibit D – Proposed Wellington CountryPlace PUD Master Plan))

a. **Consolidate Pods E, G, and 18.6 acres of Pod F into the newly formed Pod E and assign Pod E as a mix of Equestrian-residential (five (5) lots proposed) and a residential density of 0.85 units per acre**

b. **Transfer all remaining units from Pod F (Phase V-VII) to the newly formed Pod E for a combined total of 114 dwelling units; with an amenity site and forfeit the remaining dwelling units.**

c. **Reconfigure the internal circulation of Pods E and F**

d. **Reduce the overall unit count for the PUD from 442 to 357 units**

e. **Label the Preserve Area in Pod E as "Preserve/ Amenity Site"**

f. **Label Pod F as "Equestrian Commercial Venue" with associated development intensity**

g. **Modify several existing Conditions of Approval and add new conditions, including a Project Standards Manual (Exhibit E) that includes development standards with specific lot configurations and setbacks**

h. **To add an access point along South Shore Boulevard to Pod E to access the proposed farm lots**

i. **To add two (2) access points along Gracida Street to access Pod F "Equestrian Commercial Venue"**

Comprehensive Plan Amendments (Ordinance No. 2023-04; Petition 2022-0003-CPA)

a. **To amend the Future Land Use Map (FLUM) designation for Pod F – Phases V, VI, and a portion of VII, totaling 114.65 acres, from Residential B (0.1 to 1.0 dwelling units per acre) to Equestrian Commercial Recreation (ECR)**

b.. **To amend the FLUM designation of a portion of Pod E, totaling 5.798 acres, from Commercial to Residential B.**

The modifications to the Wellington CountryPlace PUD Master Plan are considered to be shifts of uses within a PUD while other modifications are a change of use requiring additional applications and public hearings to finalize the proposed modifications. The relocation of the dwelling units and the deletion of dwelling units within the PUD is a common modification within a PUD. However, many of the proposed modifications require additional approvals which include an amendment to the Future Land Use Map, rezoning, a modification of PUD development standards, and modification to previous conditions of approval. The PUD modifications follow their own process and should not be intermixed with the evaluation of the proposed plan amendments and not have the PUD modification process minimize the evaluation for compliance with the goals, objectives, and policies of the Comprehensive Plan.

The amendments to the Future Land Use Map (FLUM) designation for Pod F – Phases V, VI, and a portion of VII, totaling 114.65 acres, from Residential B (0.1 to 1.0 dwelling units per acre) to Equestrian Commercial Recreation (ECR) is a major modification to the PUD as it results in a change of use and intensification to the PUD. The modification to the Equestrian Commercial Recreation (ECR) requires a review of the proposed uses and increased intensity as related to LDRs and the Comprehensive Plan. Also the amendment of the FLUM designation of a portion of Pod E, totaling 5.798 acres, from Commercial to Residential B is a modification that reduces the intensity of the 5.798 acre parcel but will require the same review required when modifying the Future Land Use Map.

Within the Wellington CountryPlace PUD, the recent modification to the current approved number of units reduces the number of dwelling units resulting in a total of 114 dwelling units in Pod E. 5 of the 114 lots are 4 acre plus farms with the remaining 109 are minimum half acre lots. The gross density for Pod E is 0.66 dwelling units per acre with the current unit revision.

Changing the FLUM designation of the commercial Parcel to Residential B reduces the potential commercial intensity of the property and is included with the proposed land use designation for the new Pod E. This property is the only commercial property within the Equestrian Preserve Area. The location of the commercial property is consistent with the location of the commercial nodes within the FLUM which are dispersed so to avoid large intense commercial areas to provide smaller neighborhood oriented commercial nodes. The dispersed locations provide convenient access to surrounding patrons while reducing

the length of distance traveled to buy goods. The commercial nodes are also located with frontage on collector or arterial roads so as to provide adequate access for delivery and service vehicles. The location along collector or arterial roadway also serves to lessen the impacts on residential areas. Equestrian Commercial Recreation areas are also placed in a similar pattern of being dispersed with frontage on a collector or arterial street. They are also primarily located along the edge of the EOZD. The proposed modification of the FLUM for Pod F from Residential B to Equestrian Commercial Recreation places Equestrian Commercial Recreation and commercial uses within an area that is not near an edge of the EOZD and is not located with frontage on a collector or arterial roadway as per the Roadway Classification Map within the Mobility Element of the Comprehensive Plan. Also the consolidation of Equestrian Commercial Recreation is not consistent with the current development pattern.

The Staff listed many policies in the staff report related to compatibility of the proposed land use with the surrounding area. However, staff has not included other policies in evaluating the requested action of the applicant which should have been the main focus in determining if the proposed use was appropriate. The omitted Polices will be detailed below. The staff report included the following policies:

Policy CSR 1.1.2 Reduce Greenhouse Gas Emissions *Reduce transportation air quality impacts by increasing non-automobile travel by improving connectivity and safety sidewalks, bicycle lanes, and multi-use pathways.*

Objective ED 3.2 School Facility Coordination: *Continue to coordinate the development approvals and planning for school facilities.*

Policy MB 1.1.2 Development Impact on Roadway LOS: *Development orders shall only be issued if the proposed development will not cause roadway levels of service to fall below the adopted LOS targets or ROW modifications are proposed to mitigate impacts and maintain the target LOS.*

Goal EQ 3 Support Wellington's Equestrian Competition Industry: *Support the equestrian competition industry as a component of the equestrian lifestyle and an economic sector of Wellington.*

Policy EQ 1.1.1 Equestrian Overlay Zoning District: *Implement the Equestrian Overlay Zoning District (EOZD) to preserve the characteristics of the EPA. The intent of the EOZD is to:*

1) *Preserve the equestrian lifestyles and large lot, equestrian farms which exist in the EOZD;*
2) *Establish site development regulations that recognize the characteristics of the equestrian lifestyle and development pattern while maintaining the overall residential density of the EPA; and*
3) *Permit limited commercial uses as defined in the land development regulations, which support the equestrian industry, within properties approved as planned developments or within commercial recreation land uses.*

Related to the above Goals, Objectives, and Policies, Policy EQ 1.1.1 Equestrian Overlay Zoning District is a very important policy to consider when evaluating the appropriateness of the proposed Pod F amendment. Staff utilized the first four words of Policy EQ 1.1.1 *(Preserve the equestrian lifestyles)* but failed to continue to the end of the first item which continues on to say "and large lot, equestrian farms which exist in the EOZD". The entire section must be read as one requirement to understand the goal of this policy is to preserve the current development pattern of the EOZD as stated in the title of the policy which states" Implement the Equestrian Overlay Zoning District (EOZD) to preserve the characteristics of the EPA". The staff report says the following: "The applicant is proposing to preserve the equestrian lifestyle through support of the equestrian venues and their success". This does not include large lot farms similar to what exist in the EOZD.

This leads into to the second item which states, "*Establish site development regulations that recognize the characteristics of the equestrian lifestyle and development pattern while maintaining the overall residential density of the EPA".* The proposed modifications to the Master Plan do not take the existing development patterns into consideration. The lots to the south are a minimum of 10 acres and the lots to the east, west, and north are a minimum of 2 acres. The minimum lot size of properties within Sub-Area D is 2.0 acres with a maximum density of 0.5 units per acre. It is acknowledged that the PUD has reduced lot sizes in some areas. These areas were approved by the County before the adoption of the EPA and creation of the EOZD. However, the proposed modification will be further reducing lot sizes to 0.50 acre lots. The consolidation of the density into a singular area may not increase the overall density (in this case the loss of the banked units reduces density in the PUD) but the consolidation of the units into one area creates a suburban enclave in the middle of the Equestrian Preserve Area which divides the Equestrian Preserve Sub-Area D and does not provide any guarantee of support of the equestrian lifestyle by the potential new residents.

The third item within Policy EQ 1.1.1 states, "*Permit limited commercial uses as defined in the land development regulations, which support the equestrian industry, within properties approved as planned developments or within commercial recreation land uses".* The proposal is within the Wellington CountryPlace PUD which is a planned development. However, this states "limited commercial uses" which does not seem to be consistent with the following proposed uses: UP TO 1500 STALLS AT BUILDOUT, 9 COMPETITION RINGS WITH SCHOOLING AREAS INTERNATIONAL EQUESTRIAN STADIUM WITH SCHOOLING AREA, DERBY FIELD WITH SCHOOLING AREA, LUNGING RINGS AND SCHOOLING AREAS, STADIUM SEATING FOR 7,000 SPECTATORS, HOSPITALITY VENUE FOR 4,000 SPECTATORS, UP TO 26,000SF OF RETAIL SPACE TO SUPPORT VENUE, 18,000 SF OF OFFICE SPACE, UP TO 45,000 SF OF STORAGE, WAREHOUSE AND MAINTENANCE SPACE.

The above was not analyzed in the staff report as related to development pattern and equestrian lifestyle but was found to be compliant as a result of providing an equestrian venue. An analysis of the intensity being added to the area and the PUD was not included in the staff report. Also, because there is no rezoning of Pod F, Staff did not require submission of a detailed site plan but rather accepted only the listing of proposed uses within the Pod F on the master plan as the only detail.

Objective LU&CD 1.3 Commercial Land Use
Apply the Commercial land use designations (Commercial, Equestrian Commercial Recreation, and Open Space Recreation) to accommodate a wide range of commercial opportunities appropriate in scale and intensity for the respective district or corridor

The proposed scale of the project (as listed in the section above) is not in conformity with the scale and intensity for the respective district or corridor because there are no collector or arterial roadways as per the Roadway Classification Map within the Mobility Element of the Comprehensive Plan to service and access the site. The access is via a private gated roadway and a two lane constrained roadway that has no shoulders. Staff has stated these roadways function as collectors as the justification for compliance with the requirement of frontage on a collector even though they are not designated as such in the Mobility Plan. Staff further stated that Pod F is adjacent to the existing facility to the north via a connection with Gene Mische Way to Pierson Road which functions as a collector and therefore the frontage on a collector road requirement is satisfied. Pod E would be the more appropriate location of the Commercial Equestrian use because it has frontage on South Shore Boulevard which has adequate right of way for future 4 lane widening, in close proximity to Lake Worth Road and Pierson Road to distribute traffic, has a commercial node at the intersection of South Shore Boulevard and Lake Worth Road within Pod E, and would be considered to be inconformity with the goals, policies, and objectives of the Comprehensive Plan.

Policy LU&CD 1.3.2
Commercial Development within Planned Development Districts (Performance Standards)
Limited non-residential uses within Planned Development Districts (PDD) shall satisfy the following performance standards:

1. **The uses and intensity are compatible with the residential character.**
   Comment: With a proposed build out of the following: UP TO 1500 STALLS AT BUILDOUT, 9 COMPETITION RINGS WITH SCHOOLING AREAS INTERNATIONAL EQUESTRIAN STADIUM WITH SCHOOLING AREA, DERBY FIELD WITH SCHOOLING AREA, LUNGING RINGS AND SCHOOLING AREAS, STADIUM SEATING FOR 7,000 SPECTATORS, HOSPITALITY VENUE FOR 4,000 SPECTATORS, UP TO 26,000SF OF RETAIL SPACE TO SUPPORT VENUE, 18,000 SF OF OFFICE SPACE, UP TO 45,000 SF OF STORAGE, WAREHOUSE AND MAINTENANCE SPACE.....it is difficult to say this is an intensity that is compatible with the developed residential within the area.
2. **The uses are supported by a market study.**
   Comment: A market study was prepared.
3. **The uses are integrated into the development pattern and provide direct and convenient access for vehicles, bicycles, and pedestrians.**
   Comment: As stated, there are no collector or arterial roads servicing this location and existing access roads are constrained.
4. **Public spaces are designed to enhance the interaction of residents of the community, including but not limited to fountains, courtyards, and or promenades.**
   Comment: No detailed site plan is available which makes evaluating this item difficult to comment on.

The Policy LU&CD 1.3.3 Equestrian Commercial Recreation Land Use, should have been included in the staff report in the evaluation to determine consistency and the appropriateness of the proposed modification to the PUD and Land Use Map. The Policy is as follows:

Policy LU&CD 1.3.3 - Equestrian Commercial Recreation Land Use
Apply the Equestrian Commercial Recreation (ECR) land use designation to accommodate commercially-oriented uses, such as arenas/stadiums, show ring facilities, and commercial stables and equestrian-oriented commercial uses, such as veterinary clinics, feed stores, tack shops. Equestrian Commercial Recreation land use is limited to the Equestrian Preserve Area located with frontage on an arterial or collector roadway and limited to a maximum intensity of 0 10 FAR.

The most important point in this Policy 1.3.3 is the location of Equestrian Commercial Recreation must have frontage on an arterial or collector road. The Wellington South (Pod F) does not have frontage on an arterial or collector on any frontage of the parcel as per the Roadway Classification Map within the Mobility Element of the Comprehensive Plan. Relocating the equestrian use from Wellington North not only removes the equestrian use from an ideal location with frontage on two collector roads that is in conformity with the Comprehensive Plan, but it also moves the use to an area that is not in conformity with the Comprehensive Plan a per the policy stated above.

The PUD master plan modification has previous approvals that have reduced the lot sizes in the eastern part of the PUD. When looking at surrounding uses the lot sizes should be considered when evaluating the request to further reduce the size of the lots. However, the transfer of the approved units to a consolidated area leaves what is a reconfigured Pod F which is adding a non-residential Equestrian Commercial Recreation component to the PUD. As a newly introduced use, an evaluation for compatibility with the surrounding development pattern should be included in the staff report as related to the following policy.

Policy LU&CD 1.1.1 - Compatible with Existing Conditions: New development shall be compatible with existing natural and built conditions. Future growth & patterns shall take into consideration topography, soil, vegetation, water quality and quantity, and other natural resources of the land. Future growth patterns shall also respect and protect the character and quality of the surrounding built environment. [Land Use and Community Design Element]

Reference has been made to the existing use to the west and north but little has been said with regards to the adjacent south development pattern. The justification for modifying the use to Equestrian Commercial Recreation looked mainly at the uses to the west which has a portion of the adjacent boundary as Equestrian Commercial Recreation but the southern portion adjacent to two acre minimum lots was not mentioned. Further justification included the north connection to Wellington International which is connected by a very narrow strip of land and the private, gated Gene Mische Way roadway. The

lands to the south of the subject property are within the Equestrian Preserve Sub-Area C which are 10 acre minimum lots. Policy LU&CD 1.1.1 states that "Future growth patterns shall also respect and protect the character and quality of the surrounding built environment". The proposed non-residential uses are of an intensity that does not consider the adjacent built use adjacent to the southern boundary of Pod F. The built environment also includes Gracida Street which is a very constrained two lane local road and is not classified as a collector. The road is constrained by guard rails for a majority of the eastern portion with the guard rails being very close to the travel lanes due to canals being both north and south of the roadway. There are no shoulders to pull off the roadway. Farther west the guard rails continue on the north side and change to deep swales on the south side with no shoulders to pull off the road in case of vehicle malfunctions. Evaluations did not include the reality of truck and trailer traffic coming to the facility especially during events. If one vehicle were to break down on this roadway, it cannot be moved off the travel lanes resulting in a massive traffic back up until the disabled vehicle can be towed off the roadway. This would be disastrous if a vehicular break down occurred during an event. Traffic was evaluated based on standard traffic principals not considering the unique character of the area and how it must function. The introduction of the intensity of uses to the area that include an event stadium does not consider the effect it will have upon the built farms adjacent to the southern boundary including their ability or inability to function during events with all utilizing one constrained non-collector road for access.

The three policies below should have been included in the staff report. Reference to the EPA and the EOZD in the below policies are to guide the preservation of the equestrian lands and lifestyle and to provide certain amenities associated with new development to expand and preserve trails and crossings, green space, and provide for grooms quarters on small farms. The policies were put in place to define and control density and intensity to further preserve the equestrian lifestyle.

Policy LU&CD 2.6.1- Equestrian Preserve Area (EPA)
The Equestrian Preserve Area is established on the Land Use Map as a specific boundary delineating the equestrian community to protect and preserve the equestrian lifestyle.

Policy LU&CD 2.6.2 - Equestrian Overlay Zoning District (EOZD)
The Equestrian Overlay Zoning District (EOZD) regulates the development pattern and standards for the Equestrian Preserve Area and defines the density and intensity, requires the preservation of green space, establishes an equestrian circulation system including safe crossings of roadways by equestrians, and allows for certain land uses not permitted in other areas of Wellington.

Policy H&N 4.1.2 Grooms Quarters –
Continue to allow grooms quarters within the Equestrian Preserve Area. Encourage the inclusion of groom's quarters in the stable or barn for properties that are less than five acres.

The Goals, Objectives, and Policies of the Comprehensive Plan were put in place to ensure controlled growth within Wellington is orderly and in conformity with the existing character of this unique area. As stated above, an in-depth evaluation of the proposed development plan utilizing the guidance of the Comprehensive Plan shows the proposed plan is not in conformity.

ECONOMIC ANALYSIS OF PROPOSED CHANGE IN LAND USES

The Wellington North Parcel Ordinances 2023-01 and 2023-02 The Wellington South Parcel Ordinances 2023-02 and 2023-04

August 21, 2023

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Economic Analysis of Proposed Change in Land Uses The Wellington North and South Parcels

1.0 Introduction

1.1 Background

Wellington Lifestyle Partners ("WLP") proposed land use changes to accommodate its planned development program. On the Wellington North Parcel WLP proposes to develop 22 single-family homes and 278 multi-family homes with recreational amenities to include the Wellington Equestrian & Golf Club and a refurbished Cypress golf course. WLP proposes to relocate the existing equestrian show grounds to their Wellington South Parcel.

The WLP plan for the North Parcel requires changes to the land uses as summarized below.

(1) Amend the future land use map ("FLUM") to remove the Equestrian Village and White Birch Farms, totaling 92.69 acres, from the Equestrian Preserve Area ("EPA").
(2) Modify the Equestrian Overly Zoning District ("EOZD")

On the Wellington South Parcel WLP proposes to relocate and expand the equestrian show grounds on the 115 acre site. In addition, the commercial land use designation could accommodate up to 90,000 square feet of commercial development.

1.2 Assignment

Kasowitz Benson Torres LLP commissioned Fishkind Litigation Services, Inc. ("FLS") to analyze certain aspects of the economic impacts of the proposals for The Wellington North and South Parcels on the: (1) brand value of the Village of Wellington, (2) feasibility and of the proposed stadium and associated land uses on the South Parcel, and (3) economic benefits to the Village of Wellington.

2.0 Impact of the Proposed Land Use Changes on the Brand Value of Wellington

Iconic communities have brand value that enhances their economic performance and boosts their real estate values. Well-known examples include Monaco, Beverly Hills, Palm Beach, and Wellington. These brand values arise from their communities' unique identities based on their histories, key attributes, and careful husbandry. By maintaining their unique identities, providing world-class amenities, and fostering exclusivity, these communities have successfully established and maintained their brand values.

The Village explains that its equestrian industry began when Polo arrived in 1977 when Gould and it's chairman "Bill" Yvisaker acquired the undeveloped parcels in Wellington. Within a decade, Wellington became an international equestrian destination hosting the coveted Polo World Cup. Wellington soon attracted other equine sports and became home to the Winter Equestrian Festival and the Olympic Jumping Team Qualifying Trials. Today there are more than 580 farms serving a variety of equestrian sports including polo, dressage, hunter/jumper, and recreational riders.

According to the staff reports for The Wellington North and South Parcels, "Wellington has become an equestrian destination that is internationally known as the "Winter Equestrian Capital of World". The equestrian season typically runs from November to May each year…. Equestrians come from other regions and countries to compete in the variety of equestrian disciplines in Wellington, such as Dressage, Hunter, Jumper, and Polo. Wellington International, formally known as Palm Beach International Equestrian Center ("PBIEC"), is a world class equestrian facility hosting thousands of participants and spectators every season and Grand Champions Polo Club."[1]

The Village of Wellington created the Equestrian Preserve Area ("EPA") as part of its master plan in 1999 to ensure the preservation and protection of Wellington's unique equestrian area, the equestrian industry, and the rural lifestyles which exist in the Equestrian Preserve. To implement its EPA, Wellington adopted the Equestrian Overlay Zoning District ("EOZD") in 2002 covering about 9,360 acres comprising about one-third of the Village.

The value of branded spaces is well documented by Sonneberg's 2013 study.[2] Although the value of branding for consumer business has been recognized for centuries, it is lacking in real estate business beyond the extensive use of naming rights for stadiums and similar facilities. Sonneberg demonstrates that place branding adds to the value of the real estate in the branded place.

[1] Staff Report, page 4.
[2] Sonnenberg, Stephan (2013) et al., Approaching Branded Spaces, Research Gate Publictions.

In its 2018 report Florida International University ("FIU") emphasized the importance of the EPA. "Lastly, the equestrian preserve, the equestrian community, and the equine industries have for 40 years defined Wellington's brand as a unique, high-quality community in which to live, work, and play. The distinctive aspects of the equine industry complex provide Wellington with a brand identity and competitive platform which very few, if any, communities can claim. The value the equine community imparts on Wellington is an intangible, yet real additional value to the Village's economy and competitive position."[3]

To quantify the brand value of Wellington, FIU noted that Wellington's economy significantly outperformed the overall Palm Beach County economy since 2010. Wellington's residential property values have also outperformed those of the County. For example, according to the realtors' multi list records, since 2020, the average closing prices for single-family homes in Wellington increased by 8% compared to just 2% for the County as a whole.

In light of these facts, it is clear that any compromise to the EOZD threatens the unique features underlying Wellington's brand value.

3.0 Feasibility of the Relocated and Expanded Equestrian Facility and Commercial Development

One of the most striking features of WLP's proposal is the lack of any scope, design, scaling, market analysis, or feasibility studies to support the proposed relocation and expansion of the equestrian facility from the North to the South Wellington Parcel. Similarly, there is no analysis of the feasibility, type, or scope for the expanded 90,000 square feet of commercial space.

Despite the voluminous filings by the applicant for The Wellington South Parcel, there is no market study supporting the proposed commercial uses and its equestrian venue. According to the sponsors, the remaining portion of Phase VII will be used as an equestrian venue to include: 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.

[3] Florida International University (2018), "Housing & Economic Development Strategic Plan Economic Competitive Analysis Report II", page 24.

The commercial and equine venue uses are not only very large in their scale, but they are significantly out of scale with existing development in the Village. To put the proposal into perspective, consider that the much larger, 385-acre, World Equestrian Center has 16 outdoor arenas and 3,000 stalls. Their facilities can accommodate between 1,300 spectators at the indoor arenas and up to 7,500 at the World Equestrian Center Stadium. World Equestrian Center has one hotel, The Equestrian Hotel with just 248 rooms.

World Equestrian Center is readily accessible from two exits off I-75 lying less than 5 miles from the interchanges. The roadway access from US27 and SR40 is excellent. The facilities proposed for Wellington are located in an area with poor access and well known congestion problems when events are underway. There has been no demonstration that Wellington's roadway network could accommodate facilities at the scale proposed by WLP. Finally, there is no cost estimate for the expanded roadway and utility infrastructure that would be needed to support development at the scale proposed for the South Parcel.

4.0 Economic Benefits to the Village of Wellington

WLP claims that its proposed development would provide very substantial economic benefits to the Village. WLP submitted a study by Zabik & Associates that estimated the total economic impact to the economy for this development would be $1.1 billion. During the construction phase of the project, it is estimated to create a total of 1,825 jobs. After construction, the project is estimated to support 340 long term jobs. Wellington contracted with Raftelis, at the expense of the applicant, to perform an independent review of the market study that was submitted and has concurred with the analysis provided.

While Zabik and Raftelis are reputable and experienced analysts, their conclusions concerning the economic impacts of WLP's development program are inflated and fatally flawed. First, the economic impact estimates are not for the Village, but instead are estimates for Palm Beach County and the broader area's economy. This is obvious from the fact that the Village's economy does not produce the construction materials needed for the project which account for roughly 50% of the total construction spending. Nor does the Village's labor force provide support for the construction or the operations of the development project. The vast majority of the spending for the construction and operations of the project will not occur in Wellington and therefore will not stimulate the Village's economy. That spending will flow mostly to the County and area's economy to their benefit, not to the Village's economy.

Furthermore, the economic impact analysis does not include any impacts from the promised relocation of the equestrian facilities from the North to the South parcel. As noted above, there is no feasibility study of the proposed relocation and expansion of the equestrian facilities.

Worse yet, there is no guarantee that the equestrian facilities will be relocated and expanded. Without such a guarantee backed by real financial support, the Village is put at risk of losing the equestrian facilities. The economic impact study by Zabic and reviewed by Raftelis fails to address this critical issue.

Zabic also concluded that the project is estimated to generate $1.15 million of ad valorem taxes for Wellington compared to just $37,429 now. While these calculations are reasonable, they are incomplete and misleading. The calculations fail to consider the service costs associated with the development. The equestrian facilities require little in the way of governmental services from the Village for public safety services and other governmental services. Not so for the proposed residential development. Without analysis of the service costs, the Zabic analysis is incomplete and misleading. Furthermore, it utterly ignores the impacts of the proposed relocation and expansion of the equestrian facilities proposed for the South Parcel.

Finally, land values and home values in the EOZD are substantially higher than in the Village outside of the EOZD. Our analysis shows that homes in the EOZD sold for $696 per square foot compared to $301 per square foot outside the EOZD in the Village.

FLS conducted an analysis of these property values using the following methodology.

I- Integrated data from the following sources:

1. Beaches MLS, Inc a wholly owned subsidiary of Broward, Palm Beaches, and St Lucie Realtors® provide access to (a)Core Logic Matrix MLS database (Matrix) and (b) IMAPP search engineer for real estate tax records.

2. Matrix residential search with the following parameters (a) Status -active and closed sales, (b) Res. Property Type-single-family, (c) County-Palm Beach, and (d) Zip Code -33414 produced 485 records of single-family houses. Forty-four (44) of the 485 records were incorporated into a table that was used in the calculation of housing values without land value.

3. IMAPP search identified 12 of the 44 single-family houses which were zoned EOZD -agricultural residential district which is the equestrian preserver area.

4. Palm Beach County Property Appraiser Website Search provided property information that included the appraised values for the land and improvements as of January 1,2022 for each of the 44 single-family units in the data set.

II-Elements incorporated into Table 1:(Village of Wellington-Data Analysis of House Value without Land Value)

	TABLE 1A Village of Wellington Data Analysis of House Value without Land Value	Explanations and Calculations	
Elements	For each of the 44 single -family units within Table 1		Column Location
1	Property Appraiser Parcel Control Number		B
2	MLS Number		C
3	Listing Status- CS for Closed Sale	**Closed:** The terms of the listing agreement have been completely executed and the subject property has been successfully brought to close.	D
4	Unit Address		E
5	Subdivision/Complex		F
6	Selling Price		G
7	Property Appraiser Value as 1/1/2022		
8	Improvements -Property Appaiser Website		H
9	Land-Property Appraiser Website		I
10	Total	Equals H Plus J	J
11	Selling Price less Total Appraised Value		
12	Amount	Equals G Less J	K
13	Amount /Selling Price %	Equals K divided by G	L
14	House Value Without (WO) Land Value		
15	Adjusted Land -(Property Appraiser's Land Value-Column I divided by .85)		M
16	Selling Price Less Adjusted Land (House Value WO Land Value)	Equals G Less M	N
17	$ Per Sq Ft (Sq Ft Living)	Equals N divided by P	O
18	Sq Ft Living	**SqFt Living -(Living Area Square Footage):** Heated / Air-conditioned Living space, measured by exterior walls not inclusive of exterior attachments i.e. garage, carport, patio or atrium space	P
19	Year Built	**Year Built:** Year of initial construction of subject property. This corresponds with Year Built in property records	Q
20	List Date	**List Date:** Effective Date of the listing agreement	R

II Aggregation of the data within Table 1:(Village of Wellington-Data Analysis of House Value without Land Value)

1. In the data aggregation, data is first collected and then sorted to make the data set more manageable. In the data analysis two subgroups were created: (a) housing within the equestrian preserved area and (b) housing outside the equestrian preserve area.
2. In the data analysis, it was determined to find the central tendency of the data set. In this case, the central tendency is the use of averages to calculate the housing value without land value in dollars per square foot living area ($ Per Sq Ft) for each subgroup.
3. As revealed in Table II the $Per Sq Ft for subgroup (a) housing within the equestrian preserve area is equal to $696.15 per square foot. While the $Per Sq Ft for subgroup (b) housing outside the equestrian preserve area is equal to $300.86 per square foot.

TABLE II			Property Appraiser Value as 1/1/2022	House Value WO Land Value			
		Selling Price	Land	Adjusted Land -(Appraiser Land/ .85)	Selling Price Less Adjusted Land	$ Per Sq Ft	Sq Ft Living
TOTAL NON EOZD	Housing Outside Equestrian Preserve	$ 40,156,900	$ 7,032,846	$ 8,273,936	$ 31,882,964	$ 300.86	105,974
TOTAL EOZD	Housing Inside Equestrian Preserve	$ 48,130,000	$ 14,571,562	$ 17,143,014	$ 30,986,986	$ 696.15	44,512
TOTAL		**$ 88,286,900**	**$ 21,604,408**	$ 25,416,951	$ 62,869,949		$ 150,486

There are a variety of important conclusions to be drawn from this analysis. First, it is incontrovertable that property in the EOZD commands a substantial premium in the marketplace. Second, WLP's proposed development would invade over 96 acres of the EOZD providing substantial value to WLP with little if any corresponding economic value to the Village or to its residents. Finally, allowing an invasion of the EOZD risks compromising the Wellington brand.