

## The Lock-Up Self-storage at Iorizzo

## STAFF REPORT

### Petition Number(s)/Type(s):

2022-0001-ZTA / Zoning Text Amendment (ZTA)  
2022-0001-CPA / Comprehensive Plan Amendment (CPA)  
2022-0002-MPA / Master Plan Amendment (MPA)  
2022-0001-CU / Conditional Use (CU)

**Ordinance(s):** 2023-06 (ZTA)  
2023-07 (CPA)

**Resolution(s):** 2023-03 (MPA/CU)

**Owner:** Pepperjack Palm, LLC.  
2334 Aqua Vista Blvd.  
Ft. Lauderdale, FL 33301

**Applicant:** BRB Development, LLC  
Robert A Soudan, Jr.  
800 Frontage Road  
Northfield, IL 60093

**Agent:** Lauren McClellan/JMorton Planning  
& Landscape Architecture  
3910 RCA Blvd., Suite 1015  
Palm Beach Gardens, FL 33410

**Site Address:** 925 State Road 7

**PCN(s):** 73-41-44-12-20-001-0000

**Future Land Use Designation:**  
Commercial (C)

**Zoning Designation:**  
Multiple Use Planned Development (MUPD)

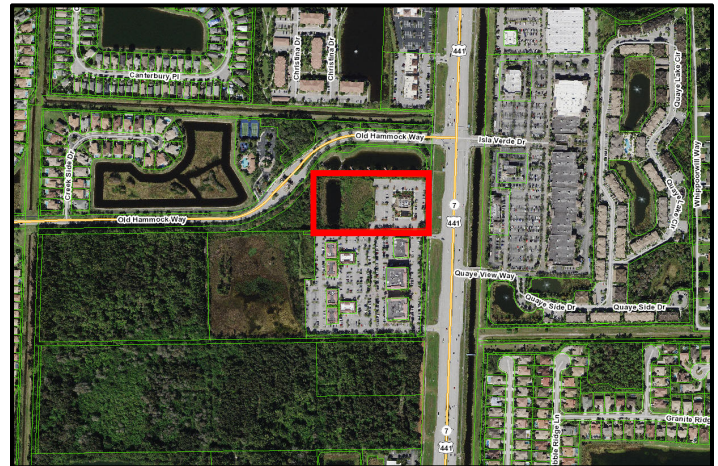
**Acreage:** 5.45 Acres (+/-)

### **Request:**

1. ZTA to allow self-storage within a MUPD as a CU approval, to provide standards for self-storage within a MUPD, and to modify parking standards for self-storage;
2. CPA to delete all site-specific conditions of approval previously adopted with the Future Land Use Map designation; and
3. MPA to modify the approved master plan and amend conditions of approval for the development of a self-storage building; and CU to allow a self-storage within a MUPD.

### **Location/Map:**

The subject property is located approximately one (1)-mile north of the Forest Hill Blvd & State Road 7/US 441 intersection, on the west side of State Road 7/US 441.



| Adjacent Property | FLUM                        | Zoning                                       |
|-------------------|-----------------------------|----------------------------------------------|
| North             | Residential C (1 - 3 du/ac) | Planned Unit Development (PUD)               |
| South             | Commercial (C)              | Multiple Use Planned Unit Development (MUPD) |
| East              | Mixed Use (MU)              | MUPD                                         |
| West              | Res. C (1 - 3 du/ac)        | PUD                                          |

### **Boards, Committees, and Council:**

|                                                  | Notice Date | Meeting Date | Vote                                      |
|--------------------------------------------------|-------------|--------------|-------------------------------------------|
| PZAB                                             | 1/3/2023    | 1/18/2023    | 7-0<br><b>Approval</b><br>(All Petitions) |
| Council (1 <sup>st</sup> )<br>ZTA/CPA            | 2/6/2023    | 2/21/2023    | Pending                                   |
| Council (2 <sup>nd</sup> )<br>ZTA/CPA/<br>MPA/CU | 2/27/2023   | 3/14/2023    | Pending                                   |

### **Public Notice and Comments:**

| Sent | Returned | Delivered | For | Opposed |
|------|----------|-----------|-----|---------|
| 18   | 1        | 1         | TBD | TBD     |

### **Project Manager:**

Damian Newell, Senior Planner  
[dnewell@wellingtonfl.gov](mailto:dnewell@wellingtonfl.gov)  
(561) 753-2577

### **Site History and Current Request:**

The 5.45-acre Iorizzo parcel was annexed into Wellington on September 9, 2003 by Ordinance No. 2003-24. The Future Land Use Map (FLUM) designation of Community Commercial (now known as Commercial) was adopted on June 28, 2005 by Ordinance No. 2005-06. The Rezoning (Ordinance No. 2007-01) and Master Plan (Resolution No. 2007-01) were both adopted on August 28, 2007.

Wellington adopted the land use designation (Ordinance No. 2005-06) with site-specific Conditions of Approval limiting the floor area ratio and with maximum allowed square footages for the proposed uses. The site-specific conditions were amended on April 12, 2011, with Ordinance No. 2011-02 to modify these limitations. Also, the Iorizzo Master Plan Amendment (Resolution No. R2011-18) was approved on July 12, 2011, to change the approval from 32,400 square feet of medical office, 4,000 square feet of bank and one (1) quality restaurant to 20,000 square feet of medical office (undeveloped) and 8,800 square feet of quality restaurant (currently developed as the Cheddars restaurant).

The applicant/owner is now requesting approval of the following applications/petitions for the undeveloped medical office portion of the site to a self-storage building:

1. Petition No. 2022-0001-ZTA, a Zoning Text Amendment (ZTA) to amend Sections 6.2.1, and 6.2.2.E.9 of Wellington's Land Development Regulations (LDR) to allow self-storage within commercial pods of the Multiple Use Planned Development (MUPD) zoning district, and Section 7.5.1 to amend the parking standard for self-storage uses;
2. Petition No. 2022-0001-CPA, a Comprehensive Plan Amendment (CPA) to delete all site-specific Conditions of Approval originally adopted with the Community Commercial (now known as Commercial) Future Land Use Map designation (Ordinance No. 2005-06 and Ordinance No. 2011-02);
3. Petition No. 2022-0002-MPA, a Master Plan Amendment (MPA) to change the undeveloped 20,000 square foot medical office as illustrated on the Iorizzo Master Plan and amend Conditions of Approval to allow development of the vacant portion of the site with a self-storage building; and
4. Petition No. 2022-0001-CU, Conditional Use (CU) to allow a self-storage use within a MUPD, if the ZTA and CPA petitions are adopted.

The applicant also submitted a Site Plan Amendment (2022-0003-ASA) for the project that is pending resubmittal for certification, by the Development Review Manager (DM), when all comments are satisfied and after Council's approval of the above applications/petitions.

### **Analysis:**

#### **1. Zoning Text Amendment (ZTA)**

Section 6.2.1, Table 6.2-1 - Use Regulations Schedule, of Wellington's LDR currently indicates that a self-storage is not permitted within a Commercial land use and MUPD zoning. The applicant

is proposing a self-storage on the Iorizzo site, which has a Commercial land use and MUPD zoning. In order for this request to be considered, the LDR must first be modified to allow the self-storage as a Conditional Use approval. Wellington's MUPD zoning districts are primarily found along or within the State Road 7 corridor. Language to allow self-storage within a MUPD has been drafted in coordination with staff for the proposed ZTA, and provided in Ordinance No. 2023-06 and Exhibit A, to allow self-storage in MUPD as a Conditional Use.

The proposed language states the building design shall incorporate four (4)-sided architecture and shall include the following:

1. Shall have architectural treatments that includes: architectural features and patterns; vertical and horizontal breaks of the plane of the building; ornamental and structural architectural details; highly visible entryways; projections and recesses; changes in floor levels; canopies or porticos, integrated with the building massing style; and overhangs proportional in size to the mass of the building.
2. Facades shall be designed to integrate with surrounding buildings and incorporate design elements to reduce the mass/scale of the self-storage building. Buildings three (3)-stories (35 feet in height) or more shall be architecturally designed to appear as two (2)-stories if adjacent to residential developments comprised of one (1) and two (2)-story residence.
3. Special paving, including stamped asphalt, shall be utilized for pedestrian crosswalks, and may be used for other areas as required during site plan approval.

Since Wellington properties within a MUPD are typically more visible from major roadways, it is important that the self-storage building incorporates architectural design/elements that are appropriate for the surrounding area, which the above standards will help ensure along with Architectural Board approval.

Currently the Land Use and Community Design Element, Policy 1.3.1 (Commercial FLUM designation), of Wellington's Comprehensive Plan states the maximum Floor Area Ratio (FAR) is 0.40, and is eligible for a reinvestment bonus maximum of 0.80 FAR. The applicant's proposed development for a self-storage at the Iorizzo project will require a 0.49 FAR. Below are proposed criteria a self-storage use within a MUPD will need to meet to obtain a FAR bonus up to a maximum of 0.50 FAR.

| Community Benefit                                                                                                                                                                                                                      | FAR Bonus |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Provide one (1) public electric vehicle charging station on-site per 0.01 FAR up to the FAR bonus for this community benefit.                                                                                                          | 0.04 FAR  |
| Provide/Improve a minimum of three (3) on or off-site amenities (above any required minimums) such as public outdoor recreation areas, public gathering spaces, green roofs, focal points such as public art or structures, public bus | 0.04 FAR  |

| Community Benefit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | FAR Bonus |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| shelters/stops, and/or pedestrian streetscape enhancements (including additional landscaping above the code minimums, seating areas with trash bins, wider sidewalks, pedestrian friendly light fixtures, etc., to improve the pedestrian experience in the area) along projects public frontage. The applicant may pay a contribution to Wellington in-lieu of providing on or off-site amenities. The monetary contribution shall be used for the beautification/improvement of public areas. The amount of contribution shall be per an engineer/architect certified cost estimate for a minimum of three (3) of the amenities for each 100,000 square feet of proposed self-storage as approved by Wellington. |           |
| Exceed landscape standards by 30% from the requirements of Article 7 and planned development sections of the LDR. Landscape enhancements shall include additional quantity and size above what is required. The applicant may contribute to the Wellington Tree Fund in-lieu of providing these additional landscape enhancements on-site. The amount of contribution shall be per a landscape architect certified cost estimate for the 30% of additional landscape enhancements.                                                                                                                                                                                                                                 | 0.03 FAR  |
| Unique community benefit as proposed by the applicant and approved by the Village Council. Village Council shall approve the FAR for this benefit per the applicant's proposal, up to FAR bonus for this community benefit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.04 FAR  |

Above are the community benefits that should be provided by a project proposing a self-storage to receive the reinvestment bonus, up to the maximum 0.50 FAR. As mentioned in the above table, a developer may provide improvements that will be a benefit to the community, or instead of providing the improvement, may provide a monetary contribution. If monetary contributions are provided, Wellington will use the funds for the beautification/improvement of public areas or improving the tree canopy on public lands for the overall benefit of the community.

Section 7.5.1. (Table 7.5-1 Minimum Off-Street Parking Standards) of Wellington's LDR indicates that a self-storage shall provide one (1) space per 200 Net Square Feet (NSF) of indoor storage and office space, with a minimum of five (5) customer spaces. At this parking generation rate, a

self-storage will be required to provide a substantial amount of parking spaces, but will not generate the demand to warrant the amount of parking. The current LDR parking rate for self-storage seems to be outdated, which the proposed language below, and within Exhibit A, will resolve.

### **LDR Table 7.5-1 Minimum Off-Street Parking Standards**

Self-storage: One (1) space per 75 storage bays, plus one (1) space per peak shift employee, plus a minimum of five (5) customer spaces.

The proposed parking generation rate is based on the number of bays, employees, and minimum number of customer spaces, rather than the self-storage facility square footage. Provided below are the self-storage parking generation rate for Palm Beach County and other local municipalities for comparison purposes.

| <b>County/Municipality</b>  | <b>Requirement</b>                                                                                                                           |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Palm Beach County           | One (1) space per 200 storage bays; minimum of five (5) customer spaces.                                                                     |
| Boynton Beach               | One (1) space per 75 bays, plus one (1) space per 300 sq. ft. of office.                                                                     |
| Lake Park                   | One (1) space per employee, plus two (2) customer parking spaces, plus one (1) additional customer parking space for every 200 storage bays. |
| Loxahatchee Groves          | Two (2) parking spaces, plus one (1) parking space per 200 storage bays.                                                                     |
| Palm Beach Gardens          | One (1) space per 75 storage spaces, plus two (2) spaces per security quarters, plus four (4) spaces per office.                             |
| North Palm Beach            | One (1) space for each 200 storage units, plus five (5) customer parking spaces.                                                             |
| Village of Royal Palm Beach | One (1) space for each employee, plus one (1) space for every 100 bays and two (2) spaces for customers.                                     |

The proposed parking rate of one (1) space per 75 storage bays, one (1) space per peak shift employee, plus a minimum of five (5) customer spaces is consistent with other local codes (county/municipality) and reflects typical demand for parking as it relates to a self-storage.

## **2. Comprehensive Plan Amendment (Future Land Use Map)**

As stated above, Wellington adopted the project's Community Commercial (now known as

Commercial) Future Land Use Map designation (Ordinance No. 2005-06 and 2011-02) with site-specific Conditions of Approval limiting the floor area ratio and with maximum allowed square footage. At that time, it was common practice to include certain conditions to a land use and zoning ordinance that referenced the related development plan for a given project. Wellington's current practice, as with other municipalities, has been to not place conditions on approvals that designate land use and zoning and to "clean-up" any previous projects with conditions that are related to the project's development plan. Instead, development entitlements/conditions are placed on the development order approving the master plan and/or conditional use(s) for a project, which is more appropriate for development related conditions. Any changes to the master plan, that increase density and intensity in the future, will require a public hearing and Council approval. It is important to note that while the conditions of Ordinance 2011-02 will be deleted, that the Commercial FLUM designation (F.K.A. Community Commercial) remains in place as original adopted for the 5.45-acre project. Most of the original Conditions of Approval, and the proposed conditions will apply to the subject project as provided in Resolution 2023-03, as.

With this request, the previous conditions of approval as listed below and adopted with Ordinance 2011-02 will be deleted.

- The property shall be limited to a maximum floor area ratio (FAR) of 0.25.
- Unless an amendment is approved by Council, the proposed uses shall not exceed a maximum of 28,800 square feet, consisting of 20,000 square feet for medical offices and 8,800 square feet for one quality restaurant.

This request is not intending to change the FLUM designation of Wellington's Comprehensive Plan for the subject property. However, a CPA approval is required to delete the previous conditions of approval since this was the regulating document for those conditions at that time. Approval of a CPA (FLUM amendment) must be based on factors including changed projections, changed assumptions, data errors in the formulation of the original plan, new issues arising since the adoption of the plan, and/or a need for additional details and/or data updates.

**Changed Projections** - Population increases over the years have created a demand for housing, and with that a demand for storage facilities. The applicant is proposing a self-storage based on the projected demand for storage space that will be needed by both residents and businesses in Wellington and throughout Palm Beach County.

**Changed Assumptions** - The applicant is proposing to develop the western portion of the site with a 107,988 square foot 850 bay/unit self-storage building. The self-storage use is a change from the approved medical office use that is based on the projected demand in the area. The existing 8,800 square foot restaurant is along the project's east frontage along State Road 7/US 441, with the self-storage building proposed to the west, behind the restaurant. The applicant submitted a full market analysis for the proposed self-storage, as illustrated in the Iorizzo Master Plan Amendment application. The market analysis is provided with this staff report (Exhibit B). A summary of the market study that demonstrates the current and future demands for self-storage in the surrounding market area is provided as Exhibit C.

The project's Commercial FLUM designation limits the maximum Floor Area Ratio (FAR) to 0.40, which equates to 94,961 square feet for the 5.45-acre site. The applicant is proposing to develop

a 107,988 square foot self-storage with the existing 8,800 square foot restaurant, totaling 116,788 square feet or 0.49 FAR. The Land Use and Community Design Element, Policy 1.3.1 (Commercial FLUM designation), of Wellington's Comprehensive Plan states the Commercial land use is eligible for a reinvestment bonus maximum of 0.80 FAR. As mentioned in the above section, the applicant is proposing a ZTA with community benefits criteria to allow a maximum reinvestment bonus up to 0.50 FAR for self-storage within a MUPD. The applicant will need to provide what community benefits will be provided to determine the associated bonus FAR for the final intensity that will be allowed prior to site plan approval of the self-storage. As the self-storage use is a low traffic generation, the proposed increase in FAR will not increase the trip generation over the previously approved medical office use. A traffic analysis has been submitted and has been determined to demonstrate compliance with the Traffic Performance Standards (TPS). Wellington's Traffic Consultant reviewed and approved the proposed level of traffic generation for this proposed project (Exhibit D).

In conclusion, the request will only delete previous Conditions of Approval on the current Commercial land use designation. The Comprehensive Plan Amendment (CPA) petition will be processed as a small scale amendment in accordance with Chapter 163 of the Florida Statutes.

### **3. Master Plan Amendment (MPA) and Conditional Use (CU)**

As indicated above, the applicant is also requesting a supporting MPA to modify the Iorizzo Master Plan (Exhibit B) and amend previous Conditions of Approval of Resolution No. R2011-18 (approved July 12, 2011). The request is to modify the 20,000 square foot medical office use, which is currently undeveloped, to a proposed 107,988 square foot 850 bay/unit self-storage building. The CU request is to allow the self-storage use, which require Council approval as stated in the above ZTA section. The MPA and CU request were reviewed for consistency with both Wellington's Comprehensive Plan and LDR.

#### **Master Plan**

Exhibit B is the proposed Iorizzo Master Plan, which includes the developed 8,800 square foot quality restaurant (Cheddars restaurant) along the project's eastern frontage on State Road 7 for the proposed self-storage. The plan illustrates a 107,988 square foot 850 bay/unit self-storage building proposed on the west portion of the site.

The proposed Master Plan request was reviewed for compliance with the following:

**Consistency with Comprehensive Plan:** If the previous conditions as adopted on the land use approval are deleted and the bonus FAR (up to 0.50 FAR) are allowed for the self-storage within a MUPD, this Master Plan request will be consistent with the Comprehensive Plan as explained above in the Comprehensive Plan Amendment analysis.

**Conformity with Zoning Standards:** This request was reviewed for compliance with all relevant and appropriate portions of the LDR. The proposed ZTA was used for the review of this project's proposed self-storage and for conformity with the zoning standards. The formal site plan is currently being reviewed for consistency with building height, setbacks, parking, landscaping, etc., and will not be approved until all other required applications are approved by Council.

As illustrated on the master plan (Exhibit B), the main and secondary access to this project/site is along the southern site boundary (Wellington Reserve Office Park) as recorded in the cross-access agreement (O.R.B. 103, P. 178-180), and ensures interconnectivity is provided for the developments along the State Road 7 corridor.

**Compatibility with Surrounding Land Uses:** As explained previously, the proposed changes are to develop the western portion of the project/site with a self-storage building. Per the proposed ZTA, the self-storage building design will need to include architecture treatments/elements that are similar in character and scale to other commercial buildings in the area along State Road 7, and shall be compatible with surrounding land uses. The surrounding residential use to the west and north is buffered with established existing landscaping. Additional landscape will be provided to meet the requirements for the proposed self-storage. The proposed location of the building will also help to minimize any visual impact to the existing surrounding residential development. There is a large preserve and dry detention area that will separate the self-storage from the residential subdivision to the west, in addition to the existing buffers.

**Environmental Resources:** As explained, a portion of this site was already developed with a restaurant. The other portion of the site was prepared for the future development of the western section, with an outline for a building pad and parking spaces. No adverse impacts to the natural environment are expected to occur as a result of the proposed project. The preserve and dry detention area that exist on site are required to remain and shall be maintained as they have been since the initial development.

**Adequacy of Public Services:** This project/site is within an existing Urban Service Area, with water and sewer connections available in the surrounding area and to the proposed self-storage building. The applicant provided equivalency statement since the proposed impact will not exceed what the previously approved medical office use would have produced. Wellington's Traffic Consultant have reviewed the request for compliance with the Traffic Performance Standards (TPS). Wellington's Traffic Consultant has provided Conditions of Approval as stated Exhibit D and incorporated in the amended master plan list of conditions.

### **Conditional Use**

LDR Section 5.3.7. defines Conditional Use as those uses that are generally compatible with the Future Land Use Map and Zoning Map designations, but may require additional conditions to ensure mitigation of impacts to adjacent properties. The proposed self-storage use was reviewed for compliance with the current and proposed standards that are applicable to Conditional Uses, which are detailed as follows:

**Consistent with Comprehensive Plan:** The proposed use is consistent with Wellington's Comprehensive Plan including, but not limited to, preserving and protecting the characteristics of the communities in Wellington, and the Land Use, Transportation and Infrastructure Elements. As indicated previously, the proposed ZTA approval will be required to ensure the FAR bonus is allowed for the proposed self-storage use. The ZTA will also be required to ensure that the use is eligible for a Conditional Use approval within a MUPD.

**Complies with supplementary use standards:** The plans were reviewed for compliance with all relevant and appropriate portions of the LDR. The propose self-storage use complies with the

standards, including but not limited to minimum setbacks, maximum building heights, minimum parking, minimum lot size, and landscape standards. However, the applicant/developer of the self-storage will need to provide community benefits to receive the FAR bonus, up to the maximum 0.50 if the ZTA is approved as proposed.

**Compatibility:** The proposed self-storage use is compatible with the surrounding residential and commercial uses. The proposed use should provide needed storage space that will support the existing residential and commercial uses in the area.

The proposed building will be located on the western boundary of the project adjacent to the Black Diamond residential development, and approximately 1,200 feet from the closest single-family residential building. The applicant intends to reduce the mass/scale of the three (3)-story self-storage building by designing the building to appear as a two (2)-story building. The proposed building will be buffered by established landscaping and should not adversely impact the existing single-family residential development.

**Design minimizes adverse impact:** The proposed project site design will minimize adverse impacts, including visual impact and intensity with the existing lake and landscaping buffering between the adjacent residential development.

**Adequate public facilities:** The subject site is within Wellington's Urban Service Area that has sanitary sewer and adequate potable water capacity to service the proposed uses, and will maximize the use of existing and future infrastructure. Wellington's Engineering Services Department has reviewed the request for compliance with requirements for public facilities. Wellington's Traffic Consultant has determined this project meets the Traffic Performance Standards and adopted Level of Service (LOS). PBC Fire Department will be able to serve the site with the station located on Stribling Way.

**Design minimizes environmental impact:** There are no adverse impacts to the natural environment expected to occur as a result of the proposed uses.

**Development patterns:** The site is one (1) of the few undeveloped parcels along State Road 7 in this area. The overall project was intended to be developed in two (2) phases, and this is the final phase of the project. After approval of the proposed applications, the developer will be required to obtain site engineering, utilities, and building permits for the proposed use.

**Other relevant standards of Code:** Conditions of Approval are recommended that will regulate the proposed development order(s) and help minimize any potential impacts.

**Consistency with neighborhood plans:** There is no existing neighborhood plan for this area. Exhibit E is the applicant's financial analysis on the estimated impact fees, tax valuation, and permit fees for the proposed self-storage if approved as requested. The actual value for the financial impact this project will have on Wellington will not be known until the permits are approved and/or the project is completed.

The applicant's justification statements for all requests (ZTA/CPA/MPA/CU) are provided as Exhibit F, with detail on how the request meets the requirements, and general details on the proposed development. The complete Zoning Text Amendment (Petition No. 2022-0001-ZTA),

Comprehensive Plan Amendment (Petition No. 2022-0001-CPA), Master Plan Amendment (Petition No. 2022-0002-MPA), and Conditional Use (Petition No. 2022-0001-CU) applications are available for review at the Planning and Zoning Division office.

### **Summary:**

Based on the findings, consistency with Wellington's Comprehensive Plan and Land Development Regulations, the Planning and Zoning Division recommends approval of the following:

1. **Ordinance No. 2023-06**, a Zoning Text Amendment (Petition No. 2022-0001-ZTA) to amend Sections 6.2.1 and 6.2.2.E.9 of Wellington's Land Development Regulations (LDR) to allow self-storage as a Conditional Use within commercial pods of the Multiple Use Planned Development (MUPD) zoning district, and Section 7.5.1 to amend the parking standard for self-storage uses.
2. **Ordinance No. 2023-07**, a Comprehensive Plan Amendment (Petition No. 2022-0001-CPA) to delete all site-specific Conditions of Approval adopted with Iorizzo project land use designation. The current Commercial (F.K.A Community Commercial) FLUM designation will not change with the approval of this request.
3. **Resolution No. R2023-03**, a Master Plan Amendment (Petition No. 2022-0002-MPA) to change the undeveloped 20,000 square foot medical office as illustrated on the Iorizzo Master Plan and amend conditions to allow development of the vacant portion of the site with a self-storage building. The resolution also includes a Conditional Use (Petition No. 2022-0001-CU) to allow a self-storage within a MUPD, with Conditions of Approval as provided in Resolution No. R2023-03.

### **List of Exhibits:**

|           |                                         |
|-----------|-----------------------------------------|
| Exhibit A | Proposed Zoning Text Amendment Language |
| Exhibit B | Proposed Iorizzo Master Plan            |
| Exhibit C | Summary of Market Study                 |
| Exhibit D | Traffic Letters                         |
| Exhibit E | Project Financial Analysis              |
| Exhibit F | Justification Statements                |