

# Exhibit X - Justification Statement

## THE WELLINGTON NORTH

Future Land Use Map Amendment

Zoning Amendment

Master Plan Amendment

*Justification Statement*

*October 18, 2023*

### **Introduction**

The Applicant, Wellington Lifestyle Partners, LLC, an affiliate of Wellington Equestrian Partners (WEP) owns the Subject Property comprising of 96.17 acres, and consisting of 5 parcels located within the Wellington PUD. Specifically, the Subject Property includes Pod “30 C-2” and Pod “30 C-4”. The Subject Property is owned by key stakeholders in the community such as Wellington Lifestyle Partners and affiliated LLC’s. The Applicant is working to protect, expand, and enhance Wellington’s equestrian community today and into the future. WEP has spent over 15 years and hundreds of millions of dollars developing and expanding the equestrian industry in Wellington. As part of this vision, the Applicant is seeking a future land use map amendment, removal of the Subject Property from the Equestrian Preserve Area, rezoning, and a master plan amendment. The Subject Property is made up of the Equestrian Village (which has a stadium, multiple arenas, 192 stalls, and other pavilions) and the polo fields at White Birch. Collectively the Subject Property hosts dressage, jumper derbies, grand prix events, horse exhibitions, and equestrian clinics.

Applicant is proposing the redevelopment of Equestrian Village and White Birch into a residential club community which would have a total of 96 dwelling units across the parcels, which include 49 single-family units and 47 multi-family units. Equestrian Village and White Birch are vested for 4 and 2 units, respectively. The proposed master plan amendment would result in a 90-unit increase.

The Village of Wellington was the trailblazer in creating an integrated equestrian community and lifestyle where equestrians could establish homes and make significant investments in properties and lifestyles. This has led the Village to become a model for other equestrian-focused communities. While the Village of Wellington currently has a deeply rooted foothold in the global equestrian industry, the market is competitive, and it is continuing to grow. Recently, the largest equestrian complex in the country was developed in Ocala, Florida. The 7,000-acre “World Equestrian Center” (“WEC”) is an equestrian destination that provides world class equestrian amenities, residential communities, hotels, shopping, and dining. In short, they are seeking to compete with Wellington’s success. In addition, Terra Nova, in Sarasota, has begun the marketing of its property with the “Live, Ride, Compete” tagline, and will be competing with hunter jumper dates in the winter, spring, and fall. The applicant believes that there will be a more aggressive transition to the equestrian lifestyle and more competitors will enter the space both nationally and internationally. Globally, there are strengthening winter circuits in Spain, Portugal, and Italy. To preserve the Village’s stake in the equestrian industry and strengthen our community’s position as the Equestrian Capital of the World, the showground capacity in Wellington must be increased and enhanced, and high-end residential opportunities and lifestyle elements must be invested in to support the equestrian facilities and way of life.

Over the last twenty years, the Bellissimo family and other local Wellington families have assembled a collection of central lands, that present an extraordinary opportunity to enhance the showgrounds and

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all three horse sport disciplines – jumpers, hunters, and dressage, as well as create a new residential club community that adds to the equestrian and sporting lifestyle that has come to define Wellington. In the fall of 2022, the Bellissimo family and their partners asked NEXUS Luxury Collection, backed by Joe Lewis, Tiger Woods, Justin Timberlake, Christopher Anand, Doug McMahon and their development team which created Albany in the Bahamas, to plan, design and build a new residential community in Wellington. The new club community is centered on refurbishing an existing golf course (127 acres) currently within Palm Beach Polo. The Cypress Golf Course was added to two other parcels (Wellington North 96 acres and Wellington South 174 acres) to spur the formation of the new Wellington Equestrian & Golf Club. This new private, residential club community will be defined by understated elegance in keeping with Wellington’s green and bucolic environment. The club community will have a range of small farms, custom homesites, and a collection of townhomes catering to Wellington’s seasonal and full-time residents. With equestrian, fitness, racquet, swimming, dining and golf amenities, the club will ultimately celebrate the best of western Palm Beach County living which complements the equestrian lifestyle so central to the Village of Wellington. The Wellington Equestrian & Golf Club and ancillary development efforts of WLP is essentially comprised into three projects: The Wellington North (96.17 acres)(this petition), The Wellington South (174 acres) (a separate, concurrent petition), and The Wellington Market (17.86 acres outside the EPA) (a future petition for a commercial project open to the public).

The WLP developments will respect open spaces and add expansive, green landscaping and garden-like settings to provide for walking trails, pathways and avenues all in keeping with the look and feeling of Wellington. Canopied streets and sidewalks will meander throughout the community creating pockets of new development that will showcase sporting amenities along with architecture supporting an array of single-family homes on estate lots, small farms, and townhomes. A quarter of the community’s land will be set aside as open spaces, water bodies, and landscape concentrations adding to the garden like setting of the proposed developments.

The Wellington Equestrian & Golf Club will appeal to existing Wellington families and new families drawn to Wellington for the equestrian lifestyle. We envision the residential community will carry on the tradition of Palm Beach Polo, Mallet Hill, Southfields, and Equestrian Club Estates attracting both full-time and seasonal residents.

The Wellington Market (17.86 acres outside of the EPA and not part of this petition), is envisioned to be a charming streetscape with qualities of a ‘main street’ in a village that supports a collection of restaurants, shops, specialty retailers, local shops, office space, some residences and a luxury boutique hotel. The Wellington Market will be designed to be walkable and inviting for outdoor spaces and gatherings at its many new establishments. It is being designed as a place where all of Wellington can meet throughout the year.

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

- 1) Future Land Use Map Amendment: application to change the future land use for a portion of Pod

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30C-2 (Equestrian Village) and Pod 30C-4 (White Birch) totaling 96.17 acres from Equestrian Commercial Recreation to Residential D, with a restriction of no more than 96 units.

- 2) Future Land Use Map Amendment: application to remove a portion of Pod 30C-2 (Equestrian Village) and Pod 30C-4 (White Birch) totaling 96.17 acres from Equestrian Preserve Area.
- 3) Comprehensive Map Amendment: application to remove a portion of Pod 30C-2 and Pod 30C-4, totaling 96.17 acres from the Bridle Path Map and to be removed from being identified as a “Major Equine Destination”.
- 4) Comprehensive Map Amendment: application to change a portion of Pod 30C-2 and Pod 30C-4, totaling 96.17 acres from being identified as a “venue” on the Pedestrian Pathway Network Map.
- 5) Comprehensive Map Amendment: application to change a portion of Pod 30C-2 and Pod 30C-4, totaling 96.17 acres from being identified as a “venue” on the Multi-Modal Pathways Map.
- 6) Comprehensive Map Amendment: application to change a portion of Pod 30C-2 and Pod 30C-4, totaling 96.17 acres from being identified as a “venue” on the Bicycle Lanes Map.
- 7) Zoning Map Amendment: application to remove a portion of Pod 30C-2 and Pod 30C-4 totaling 96.17 acres from the Equestrian Overlay Zoning District (EOZD) to PUD.
- 8) Wellington PUD Master Plan amendment for 96.17 acres to provide for an additional 90 units for a total of 96 dwelling units.

This Justification Statement addresses each of the 8 concurrent requests above. These requests are brought concurrent to the Applicant’s development requests for the project known as “The Wellington South,” which proposes the additional equestrian facilities to be constructed south of the existing Wellington International showgrounds and a second high-end residential community to support the vision of expanding and solidifying the equestrian industry in Wellington. This Application precedes the future project known as The Wellington Market which adds office space, retail, restaurants, a boutique hotel, entertainment, additional residential options, and a hotel to a nearby property to create an integrated mix of uses that support and enhance the Village’s equestrian industry and lifestyle, which is necessary to solidify its designation as the Equestrian Capital of the World.

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### **Location**

The Subject Property is located upon 96.17 acres at the northeast corner of South Shore Boulevard and Pierson Road. The Subject Property is surrounded by residential, equestrian, and commercial uses. The Project has approximately 800 feet of frontage along South Shore Boulevard and 3,300 feet of frontage on Pierson Road. The Project is located within the X and AE flood zones and is not located within a Palm Beach County wellfield protection zone.

### **Properties/Ownership**

The Wellington North consists of 5 different parcels with 5 different owners, as provided below.

Owner	PCN	Date Acquired
Stadium North, LLC	73-41-44-16-22-001-0030	09/26/2007
Stadium South, LLC	73-41-44-16-22-001-0020	10/29/2007
Polo Field One, LLC	73-41-44-16-22-001-0010	08/27/2007
Far Niente Stables I, LLC	73-41-44-16-21-001-0000	10/20/2021
Far Niente Stables II, LLC	73-41-44-16-22-001-0040	05/24/2006

All properties, as identified above, were conveyed by deed. Upon information and belief, the Subject Property has not been subject to a homestead exemption in the recent past.

### **Land Use and Zoning**

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

- Pod 30C-2 (Equestrian Village) – 4 dwelling units

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- Pod 30C-4 (White Birch) – 2 dwelling units

The properties immediately adjacent to the Subject Property are:

SURROUNDING PROPERTIES			
DIRECTION	PROJECT	FUTURE LAND USE	ZONING
NORTH	Palm Beach Polo	Residential D	PUD
SOUTH	Southfields	Equestrian Commercial Rec.	PUD/EOZD
EAST	Palm Beach Polo	Residential D	PUD
WEST	Broadview	Commercial	PUD

**Master Plan Amendment**

The existing Equestrian Village is home to a stadium, multiple arenas, 192 permanent horse stalls, and other pavilions. This facility currently hosts dressage, jumper derbies, grand prix events, horse exhibitions, and equestrian clinics. Based on the location of this facility, considerable traffic (vehicular, pedestrian, and equestrian) is generated due to logistics of moving horses and equipment back and forth from this venue to Wellington International (WI), formerly PBIEC.

A goal of the Village’s comprehensive plan is to “[e]nhance the quality and character of Wellington’s neighborhoods, commercial districts, travel corridors, and equestrian community to continue to maintain a Great Hometown!” (See LU&CD 1 of the Comprehensive Plan). Further, the Village has the goal to “[m]aintain a high quality of life through community design and appearance with the Village’s neighborhoods and districts.” (See LU&CD 2). As part of the Equestrian Element of the Comprehensive Plan, the Village enumerates its goals in preserving Wellington’s equestrian community and its equestrian lifestyle; to maintain a multi-modal transportation network which focuses on safety of horses and riders; and to support the equestrian competition industry as a component of the equestrian lifestyle and an economic sector of Wellington. Applicant’s proposal is consistent with these goals and Applicant seeks long-lasting synergy which create sustainability of the equestrian community.

The market has shown there is significant global interest to compete and invest in Wellington; however, without additional equestrian facilities capacity in Wellington and the addition of high-quality housing options within the immediate area, the equestrian industry cannot sustain growth and may suffer retraction by those willing to move their equestrian operations to the newly opened, 7,000 acre WEC in Ocala, Florida which is a self-contained destination. WEC, together with the aforementioned Terra Nova venue and strengthening European winter events, requires that Wellington must expand its lifestyle offerings in order to achieve a vision which solidifies Wellington as the equestrian capital of the world. As a greater equestrian experience leads to more invest in quality barns and residences in Wellington, there is an increased likelihood generations of residents and industry participants will continue to call Wellington their home. The best way to preserve Wellington’s equestrian lifestyle is to invest and strengthen its equestrian venues as well as enhance the lives of its residents. Furthermore, the introduction of a world-class residential community will attract both equestrian and non-equestrian

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residents from the burgeoning West Palm Beach professional community who are looking for a family oriented-high quality community experience that Wellington would be able to offer.

In becoming the Equestrian Capital of the World, four core objectives need to be executed 1) protect, expand, and enhance Wellington’s equestrian venues; 2) expand high quality residential options (i.e. “Golf Cart-in and Golf Cart-out” residential opportunities); 3) elevate the residential experience with world renowned lifestyle community and equestrian downtown; and 4) integrate community context and connectivity.

*Protect, Expand, and Enhance Equestrian Venues:* To ensure world class equestrian venues for polo, dressage, and jumping are protected for future generations, the first step was the sale of the International Polo Club (IPC) to the United States Polo Association (USPA). USPA, as a well-funded steward of polo, may very well expand the polo season and ensures a permanent home of the sport for the considerable future. This application paves the way for the following:

Equestrian Jumping represents the strongest driver of the Wellington equestrian economy, estimated over 75% of the economic activity. Together with Dressage, the two equestrian domains are estimated to represent over 85% of the economic activity. Events, for both the Jumpers at Wellington International and Dressage at the current Equestrian Village property have significantly outgrown their event venues. Prior to an Affiliate of the Applicant selling the venue and operations to Global Equestrian Group (GEG) in 2021, the Jumper showgrounds consisted of the following 86.62 acres:

- Core Showgrounds (73414420170030000) – 64.87 acres
- Showgrounds Extension – Parcel 1 ((73-41-44-20-20-000-0010) - 6 acres
- Showgrounds Extension - Parcel 2 (73-41-44-20-20-000-0020) - 6 acres
- FEI Area with Grand Prix Village (73-41-44-20-09-000-0080) - 9.75 acres.

As part of the WI sale to GEG in July of 2021, the affiliate of the applicant sold 10.93 additional acres (residentially zoned) to GEG. Further, as part of the contemplated Showground Expansion sale contract outlined below, in March 2022, a Wellington Equestrian Partner (WEP) sold 13.56 residential acres to GEG

- 3650 GENE MISCHÉ WAY (73414420200000080) 6.6258
- 3780 GENE MISCHÉ WAY (73414420200000080) 6.9340

As a separate application, an affiliate of the Applicant, working alongside)the new owner of the Wellington International Showgrounds, will be constructing additional equestrian facilities on approximately 114 acres located adjacent to the existing Wellington International Showgrounds. The land is *currently zoned residential within the Wellington Countryplace PUD (WCPPUD has 199 allocated yet un-built dwelling units) and this application contributes to a conversion of that acreage into Equestrian Commercial Recreation by moving the Dressage operation to the new additional equestrian facilities.* This conversion of land from Residential B to Equestrian Commercial represents a growth of the core equestrian facilities from 86.62 acres to over 190 acres or a growth of 119% of the core equestrian venue footprint. When adjusting for the

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transition of the 40 acres within the Global Dressage venue to the co-located facilities , it still represents a significant growth of the total equestrian facilities by approximately 50%. The continued success of the Wellington equestrian domain rests in its commercial equestrian arenas in support of its competitions which drives global demand for the lifestyle. The additional equestrian venue and addition of land designated as Equestrian Commercial Recreation will address many issues that have been outlined in surveys that were completed by the Equestrian Preserve Committee (EPC) in their 2015 and 2021 surveys (detailed below). Co-locating the Jumping and Dressage facilities will increase operational and venue efficiency of the businesses and venues. It also dramatically reduces local impacts of traffic conflicts across Pierson Road and South Shore Blvd. by reducing safety issues, such as vehicular-pedestrian conflict points, related to these intersection crossings. Further, this co-location will create significant internal capture from surrounding areas where it is estimated that over 90% of all barn traffic is South of Lake Worth and West of South Shore and South of Pierson Road. This consolidation makes room at the subject site for new quality residential offerings to be built in the heart of Wellington.

*Expand Residential Options:* A thriving equestrian community requires a sense of place – this starts with housing. As seen in affluent ski towns of Colorado or the French Alps, successful areas have what is known as “ski-in/ski-out” capabilities. An equivalent “Golf Cart in/Golf Cart Out” should be provided in Wellington for the equestrian community. Housing options integrated within close proximity to equestrian venues will provide this experience. Without a high-quality residential vision, far too often are competing equestrian markets luring residents, competitors, businesses, and other economic drivers away from Wellington. This will be part of a high-profile world-renowned residential lifestyle community. The Wellington North will be the residential project at the equestrian heart of Wellington capitalizing on the close proximity to both WI and IPC. The conceptual site plan proposes 22 detached single-family lots on the White Birch Property, 27 detached single-family lots on Equestrian Village and up to 47 multi-family dwelling units on Equestrian Village. Apart from the dwelling units, the neighborhood would have a multi-generational club with a sports and wellness center, tennis, pickleball, and padel courts, and a golf facility which includes a golf driving range and short game facility. The club revolves around healthy living and promoting an active lifestyle for residents of all ages.

*Elevate the Lifestyle Experience:* The Wellington North would become a destination with various housing options and country club-level amenities which would include tennis courts and a golf facility. While not a part of the current application, the anticipated redevelopment of the Professional Center of Wellington and Broadview property would further enhance the experience by adding an equestrian downtown to the community that would include a hotel, restaurants, retail, and offices. An “equestrian downtown” would attract year-round visitors and equestrian businesses which would provide an eat-work-play-connect destination for the equestrian and non-equestrian community alike. This downtown concept would bring the polo, jumping, dressage, and general public together with high-end restaurants, shops, offices, and green spaces which would provide opportunities for community and cultural events. This downtown would further promote community by featuring equestrian and non-equestrian art and cultural exhibits

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and a home for a Village of Wellington museum which will educate us all on the history of the village.

*Village Connectivity*: A vision of curated environments allowing Wellington residents and visitors to participate socially, professionally, and financially in the equestrian industry through multi-modal pathways further reducing vehicular trips amongst the fractured equestrian venues.

The impacts of this proposal would secure equestrianism in Wellington, independent of venue owners, which improves the experience of equestrian participants and sustainability of the most impactful economic driver in Wellington. By stimulating investment in older commercial and residential properties, this area would facilitate high-quality job creation. Further beyond venue enhancements, the greatest need in the equestrian community is residential options. An ancillary benefit of filling this residential demand is that the tax base will benefit greatly from both impact fees and expansion of non-agriculturally exempt land, which will dramatically impact the tax base. And finally, with the co-location of equestrian facilities and the proximity of high-quality housing options, the traffic patterns through internal and localized traffic capture would limit unnecessary conflicts and impact which plague major intersections in this area of the Village.

Furthermore, based on the Equestrian Committee Surveys completed in 2015 and 2021, summarized below, these applications are consistent with the comprehensive plan, and further satisfies many of the stated deficiencies:

1. *Equestrian footprint needs to expand to be world class:*

- Both show jumping and dressage are too small and congested to support growth, footprint must be expanded;
- Competition from World Equestrian Center in Ocala, Florida;
- Increased footprint will alleviate certain environmental pressures from overly dense facilities (i.e. storm water and wash water);
- More green areas.

2. *Significant Infrastructure Investment needed to make wellington a world class destination:*

- Shopping, high-quality restaurants, and amenities;
- Create retail environment for local businesses to thrive;
- Need a city-place type concept, places to gather.

3. *Congestion and dangerous traffic patterns:*

- Need for safe passage for horses, riders, and pedestrians.

4. *Enhance connection between equestrian and non-equestrian community:*

- Need to provide educational programming to bridge the gap and create a more accessible environment to the entire community.

5. *Hotels:*

- Not enough hotel rooms/lodging, more lodging options will bring in potential sponsors and competitors;
- Short-term visitors will encourage future investment—sponsorship, owners, developers;
- Extended stay hotel option.



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Therefore, Applicant requests to provide a unified residential development which has up to 96 dwelling units in addition to the country club level amenities which will be used by residents and non-resident members. The amenities on the north side of the Equestrian Village Property and the amenities and residential units on the White Birch property will be developed first, and the requested residential units on Equestrian Village will be built once the facilities needed for dressage are relocated.

We are removing the request for the land use change for the Coach House Parcels. This property will be integrated with the overall development of the Equestrian Village and White Birch properties but we are maintaining the current land use, masterplan designation, and entitlement for Coach House.

### **Rezoning**

The Subject Property is currently within a Planned Unit Development (PUD) with approximately 96.17 acres is located within the Equestrian Overlay Zoning District. As part of the future land use amendment, as discussed below, Applicant seeks to rezone the property from PUD/EOZD to PUD which removes the total property out of the EOZD. The EOZD is intended to preserve, maintain, and enhance the Wellington's Equestrian Preserve Area (EPA) as identified in the village's comprehensive plan. While the proposed project will continue to support and complement the equestrian industry, the EOZD's rural development standards are incompatible with this project. While the proposed project is not "rural", the equestrian industry is not necessarily rural either. To achieve the desired results as discussed herein and through this statement, a quality residential development is necessary to achieve the future visions for the industry and the Village. This application supports a stronger venue infrastructure which ultimately preserves interest in our unique equestrian lifestyle.

The EPA is an important element of the Wellington equestrian experience; however, Wellington's success as an equestrian community is centered around its venues and licensed competitions, specifically dressage and show jumping which represent approximately 85% of the annual equestrian economic impact. The strategy in 2007 was to transition the Winter Equestrian Festival from what was a large temporary horse show focused on show jumping and spanning 7 weeks to an industry with integrated dressage and jumper shows spanning over 38 weeks. This transition quintupled the equestrian industry driving demand for additional equestrian facilities as well as provide for additional housing.

The core of the proposed applications is the ability to dramatically enhance the equestrian venue capacity in Wellington which is critical to the EPA and the resulting EOZD overlay district. Through a series of transactions in the last year, Applicant has provided a pathway to increase land designated Equestrian Commercial Recreation and build the first phase of a new additional equestrian venue to ensure the smooth transition and relocation of Dressage and create a world class derby field. . These lands are located within the Wellington Countryplace PUD. The property subject to this request, while removed from the EPA, is approximately 96 acres of commercially zoned property which is made up for in companion applications.

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The existing Global Dressage Festival business has outgrown the Subject Property which creates challenges and safety issues relating to increased traffic conflicts where vehicles, pedestrians, and equestrian traffic must cross Pierson Road and South Shore Boulevard on a constant basis throughout a 12-week festival. The fundamental strategy exchanges 114 acres located within the Wellington Countryplace PUD of residential land to equestrian commercial (New Showgrounds Venue) for 96 acres of new residential land at the subject property. Doubling Wellington's equestrian venue capacity in a way that creates operational synergies is critical to Wellington's long-term success. As stated above and throughout this statement, the proposal will improve the customer experience as it will reduce traffic conflicts by the consolidation of participants and spectators to co-located venues connected by an internal North-South corridor venue preventing unnecessary conflicts from vehicles, pedestrians or equestrian traffic crossing significant roadways.

Moreover, the "equestrian lifestyle" is not exclusive to the EPA – the lifestyle exists outside the EPA in a network of residential communities, village amenities, and retail centers all across Wellington. As stated within the Village's comprehensive plan, preservation of the EPA is not by setting aside large tracts of land but instead seeks to promote the equestrian community and lifestyle. The biggest fundamental risk to Wellington's long-term preeminence and its transition to the equestrian capital of the world is the lack of investment in showground venues and residential housing, especially housing that is integrated with the Showgrounds in mind. The strength of the Subject Property, given its close proximity to the existing Showgrounds and additional new equestrian venue, is that it can be part of a world-class, integrated residential lifestyle experience that will be iconic to Wellington. With stronger venues, more people will invest in Wellington's residential properties, and produce a greater chance that these residents will remain valued members of the community.

The Village's charter intends to "preserve and protect the distinctive characteristics of the individual communities within the boundaries of Wellington." The Subject Property does not have the distinctive characteristics of the EPA from a planning perspective, nothing north of Pierson Road (besides Palm Beach Little Ranches) and east of 140 Avenue South (besides Blackwatch Farms and 13921 Pierson Rd) is within the EPA. The Wellington North is surrounded by multi-family and commercial properties and is no longer a logical addition to the EPA. The Property is currently inconsistent with Policy EQ 2.2.1 which provides that the maximum of two travel lanes shall be within the EPA with possibly the exception of Lake Worth Road and South Shore Boulevard between Pierson Road and Lake Worth Road. It should be noted that there are 4 travel lanes with directional turn lanes along the western boundary of the Property and further highlights how this property is out of character and is unsuitable to remain in the EPA. Originally, shell rock roads were characteristic of the EPA; however, significant funds are now reserved by the Village to expand the Pierson Road and South Shore Blvd. intersection. Objective EQ 2.2, "Maintain a roadway network within the EPA that minimizes the impacts of vehicular traffic." While Pierson Road may have once been a shell rock road, it has since been paved and now forms a significant intersection with South Shore Blvd. This is not indicative of preserving the equestrian lifestyle and shows how there has been a change in circumstances which further warrant the request to be removed from the EPA.

MASTER PLAN AMENDMENT & REZONING APPLICATION REQUIREMENTS:

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1. That the proposed request is consistent with the purposes, goals, objectives, and policies of the Comprehensive Plan.  
**RESPONSE: The proposal is consistent with the purposes, goals, objectives, and policies of the comprehensive plan as discussed throughout this justification statement.**
2. That the proposed request is in compliance with all articles of the Land Development Regulations (LDR).  
**RESPONSE: The proposal is consistent with all articles of the LDR as discussed throughout this justification statement.**
3. That the proposed request minimizes environmental impacts, including but not limited to water, air, stormwater management, wildlife, vegetation, wetlands, and the natural functioning of the environment.  
**RESPONSE: The proposal will not impact water on the site, but instead this project would result in an increase in water surface area. This project will not impact air rights or quality. Please see the enclosed drainage statement regarding stormwater management. This is a mostly vacant site which is used as an equestrian venue. There is no wildlife, native vegetation, wetlands or any natural functioning environment on site.**
4. Provide the overall design concept and show that the design of the proposed request minimizes adverse effects, including visual impact and intensity of the proposed use on adjacent lands.  
**RESPONSE: Enclosed herein with this statement is a conceptual site plan which shows the overall design of the property.**
5. That the proposed request is consistent with applicable neighborhood plans.  
**RESPONSE: This property is not subject to any neighborhood plans.**
6. That the proposed request will result in a logical, timely and orderly development pattern.  
**RESPONSE: This is a logical location for a neighborhood. Moreover, this infill project prevents urban sprawl.**
7. That the proposed request complies with Wellington building standards.  
**RESPONSE: This project will comply with applicable building standards.**

#### Compliance with Code

##### *Section 5.3.5.-Master plan*

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

- A. No permits for development shall be issued prior to the approval of the master plan/amendment and the corresponding site plan/amendment or subdivision plan(s).

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- B. A conceptual site plan or subdivision plan is required as part of the application for a master plan/amendment.

**A conceptual site plan has been provided with this Application.**

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

*Article 6, Chapter 5 – Planned Developments*

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

The proposed development is consistent with the intent of a PDD as while the Wellington PUD is existing, the proposed amendment increases the availability of multi-modal pathways (e.g. along the southern property line) and increases private amenities for those living in the neighborhood (e.g. sports facility, golf facility, tennis, club areas). Moreover, this provides for the efficient use of the land and provides for the efficient internal circulation and internal trip capture within the overall PUD. Furthermore, the design of the proposed neighborhood will maintain adequate stormwater runoff and will be of a distinctive design providing for upscaled housing options within the Village.

*Compliance with Article 7 – Site Development Standards*

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

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

Driveways and Access – The proposed development adheres to requirements as established

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within Section 7.4.1 and 7.4.2 to promote safe and efficient traffic movement while affording reasonable access to abutting land.

#### *Compliance with Article 8 – Subdivision, Platting and Physical Improvements*

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

#### **Comprehensive Plan Map Amendments**

To achieve the vision of providing an enduring and prosperous equestrian industry in the Village, it is necessary to amend the Village's comprehensive plan maps to allow for residential units at the Subject Property. Applicant seeks to change the land use designation from Equestrian Commercial Recreation to Residential D which allows for a standard of 2 dwelling units per acre, or up to 5 units with bonuses. While this property may, from a land use perspective have an opportunity for over 480 units, that is not the intent of this project, and Applicant seeks to voluntarily restrict the maximum number of units to 96 and restrict the height to a maximum of 35 feet by including a restrictive note on the Village's Future Land Use Map. With the change in land use, Applicant seeks to further amend the Future Land Use Map to the remove the Subject Property from the Equestrian Preserve Area. Please see the discussion above in regard to Applicant's proposed removal of the subject property from the EPA.

In conformance with Article 5 of the Land Development Regulations, the proposed future land use change is due to *changed assumptions* to the level of equestrian activities and needs for housing within the village. The fractured nature of the available equestrian venues is not sustainable. As mentioned earlier, a concurrent application seeks to reclassify current residential property as equestrian commercial, which essentially doubles Wellington's equestrian venue capacity. This provides, for instance, new facilities which could accommodate competitions for all disciplines, instead of the current nature of having a fractured venue consisting of several locations throughout Wellington. With increased equestrian venue capacity, there must be the availability of desirable housing options in the vicinity – therefore the existing land occupied by Equestrian Village would be utilized to realize a new master plan which would have a variety of housing options, equestrian amenities, wellness, fitness, lifestyle elements, and a golf facility, among other amenities typically found within a country club setting.

The village is known for its abundant parks, quality schools, attractive neighborhoods, equestrian interests, and commercial services (medical, retail, entertainment). As laid out in the introduction of the comprehensive plan, the village council has the mission to “protect, preserve, and enhance all the attributes that have made Wellington a premier community. The focus on the future is to build upon the strongest attributes and complement these attributes with the development of vacant parcels. Reinvestment in certain areas and expansion of the local economy are key goals.” The equestrian sector is a significant market in Wellington, and as discussed throughout this statement, the relocation of the dressage and jumper venue to expand the equestrian facilities capacity is paramount to the continued success of the equestrian industry in Wellington. As the Equestrian Village and White Birch properties are essentially vacant, it is a goal for this area to have reinvestment and to develop these 96.17 acres. Further,

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the comprehensive plan states, “New and/or redeveloped residential proposals will be measured, in large part, on how well they fit the needs of the community, without diminishing the character and quality of life for the adjacent neighborhoods. A diversity of housing types and styles is encouraged.”

The proposed amendment to the land use is for residential entitlement only and would be compatible with the surrounding properties to the north and east which are residential neighborhoods. The Applicant intends to complement this proposed Amendment with a new application for use of the commercial property located at the Professional Center at Wellington to the west across South Shore Blvd. While not in the EOZD, this commercial offering would address the many issues outlined in surveys conducted by the Equestrian Committee in 2015 and 2021, the findings showed how significant infrastructure investment was needed to make Wellington a world-class destination to include shopping, high-quality restaurants, and other amenities. Creating this retail environment would lead to local businesses thriving. Further, the equestrian footprint needs to be expanded to be acceptable to a world market – dressage and show jumping currently have venues which are too small and congested to encourage any further growth. These surveys reference troublesome congestion and traffic patterns and the need for a safe passage for horses, riders, and pedestrians is paramount.

While the Village’s comprehensive plan sets out its mandate to protect and preserve, the comprehensive plan also talks how the village must “enhance”, “evolve” and “reinvest”. The proposal of revising the subject property enhances the area by adding quality housing. It evolves the area by understanding the market not only for the housing market, but also the desires of the competitive equestrian community. Moreover, this project provides “appropriate transitioning” as contemplated by Policy LU&CD 2.14 between a higher intensity use of Palm Beach Polo and the boundaries of the proposed EPA. While the subject property is also proposing a multi-family component, this development overall has significant amount of open space and a large water body which enhances the outdoor healthy lifestyle amenity of the club. This project is logical in its creation of a transition from a less dense EPA to the high density of Palm Beach Polo neighborhood.

### **Traffic/Multi-Modal Connectivity**

Traffic patterns will change on Pierson Road, South Shore Road, and Lake Worth Road/Gracida Street due to the co-location of the dressage and showjumping venues onto contiguous venues versus disaggregated venues requiring competitors, trainers, support staff, and spectators to traverse the Pierson and South Shore Blvd intersection. Currently, there is a significance of commuting cars, horses, and golf carts between the main Wellington International venue and the Equestrian Village venue due to the hosting both dressage and showjumping competitions at Equestrian Village. However, 85% of farms are located north of Pierson, West of South Shore and South of Lake Worth, so co-locating the equestrian venues will significantly reduces the conflict point at the Pierson/South Shore intersection.

Consistent with MB 1 Goal – “Provide a safe and effective mobility system that is accessible to all users and meets the needs of Wellington residents while preserving neighborhoods, protecting natural resources, and promoting economic development.” A conceptual circulation plan is enclosed herein. A final circulation plan signed and sealed by a registered engineer would be provided during final site plan

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approval. Please see the enclosed traffic analysis for detailed information addressing Section V of the Future Land Use Map Amendment Application.

### **Mass Transit**

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

### **Housing/Population**

The Subject Property is located within Census Tract 0077.59. The Wellington North currently consists of approximately 96.17 acres and has an Equestrian Commercial Recreation (ECR) land use designation. While the ECR has no density related to it per the comprehensive plan, the proposed land use designation of Residential D (up to 5 du/ac, including bonus) would allow up to 480 dwelling units or 1,483 persons. However, it is important to note that Applicant has proposed to restrict the density of this project, as shown on the proposed master plan amendment, to a total of 96 dwelling units. This restriction is also reflected by a note on the Future Land Use Map.

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

### **Environmental Inventory**

The Subject Property consists of several structures for an active equestrian competition venue, otherwise the property is vacant and is used for as polo fields or for other equestrian activities. Along the northern property line, including the peninsula formed within Palm Beach Polo, there is a sizable retention lake; however, there is not a natural water feature in the immediate area. There are no known threatened or endangered species at the site. There is no petroleum or other hazardous material storage at the site. Please see the enclosed maps for additional information regarding the soil composition and the nearest location of a wellfield.

### **Drainage**

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The stormwater management system for The Wellington North will provide the water quality treatment and water quantity storage required by the South Florida Water Management District (SFWMD) and the Acme Improvement District (Acme) within the limits of the Subject Property. Water quality treatment is accomplished by using approximately 5 acres of wet detention ponds and 1.5 acres of dry detention ponds. Conceptually, the project will be divided into a west basin and an east basin with the proposed outfalls of the stormwater system located along the south and east sides of the property connecting the C-23 and C-6 canals. Conceptual drainage outfall locations have been noted on the Conceptual Site Plan for the project.

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

#### **Water/Wastewater/Aquifer Recharge Analysis**

The proposed use of the Subject Property will generate a total average daily water demand of 100,114 gallons per day and a total average daily sewer demand of 77,010 gallons per day. These numbers include the residences and club facilities. Please see the enclosed Water and Wastewater analysis enclosed herein with this statement which addresses the requirements of Section IX, X & XI of the Future Land Use Map amendment application.

#### **Conservation**

As mentioned above in this statement, there are no known threatened or endangered species impacted or reasonably to be impacted by this Application. There are no known preserves or other sensitive environmental areas at the Subject Property.

#### **Recreation and Open Space**

Approximately 800 feet northwest of the Subject Property is Tiger Shark Cove Park. This park has a playground, baseball diamonds, basketball court, and open field areas. The nearest county regional park is located at Okeeheelee Park on Forest Hill Boulevard, east of the Florida Turnpike. In addition, Calypso Bay water park, which is owned and operated by Palm Beach County is located northwest of Southern Boulevard and State Road 7 in Royal Palm Beach, Florida. It is not anticipated for the proposed land use change to have any significant impact to the recreational resources of the Village or Palm Beach County.

#### **Fire Rescue**

Palm Beach County Fire Rescue Station 27 is located along South Shore Boulevard, approximately 0.5 miles south. The anticipated response time would be approximately one minute from departure of the station house. It is not anticipated that response time to the subject property would be impacted from this proposal. Notwithstanding the foregoing, there may be an increase in the number of calls per year due as an effect of the increase in dwelling units.



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### **Historic Preservation**

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

### **Public Education**

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

- Elementary School – New Horizons Elementary School, 13900 Greenbriar Blvd. – 665 feet
- Middle School – Polo Park Middle School, 11901 Lake Worth Road – 1.4 miles
- High School – Wellington High School, 2101 Greenview Shores Boulevard – 0.5 miles

School capacity determination letter (SCAD) application has been submitted to the Palm Beach County School District for approval.

### **Intergovernmental Coordination**

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

#### GENERAL INFORMATION:

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

**RESPONSE: Project is located at the northeast corner of South Shore Blvd. and Pierson Road.**

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

**RESPONSE: The project has approximately 800 feet of frontage along South Shore Boulevard and 3,300 feet of frontage on Pierson Road.**

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

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**RESPONSE: The commercial property at the corner of Greenview Shores Boulevard and South Shore Boulevard has a common owner as the Subject Property (PCN 73-41-44-16-20-001-0000 and 73-41-44-16-20-003-0000)**

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

**RESPONSE: The Subject Property consists of 5 different parcels with 5 different owners as provided below.**

Owner	PCN	Date Acquired
Stadium North, LLC	73-41-44-16-22-001-0030	09/26/2007
Stadium South, LLC	73-41-44-16-22-001-0020	10/29/2007
Polo Field One, LLC	73-41-44-16-22-001-0010	08/27/2007
Far Niente Stables I, LLC	73-41-44-16-21-001-0000	10/20/2021
Far Niente Stables II, LLC	73-41-44-16-22-001-0040	05/24/2006

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

**RESPONSE: All properties as shown above were conveyed by deed. Please refer to each deed (enclosed herein) for the cost as shown by the clerk of court.**

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

**RESPONSE: The property was not a part of a larger property.**

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

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

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

**RESPONSE: Village Council approved a FLUM amendment for a portion of the property**

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**known as the Coach House (approx. 5.5 acres). This approval converted the land use to Residential F. It should be noted that the Coach House property is not included within this petition.**

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

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

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

**RESPONSE: Except for the Wellington PUD, approved by Palm Beach County, the Subject Property has not received development approvals from an entity other than Wellington.**

#### CONSISTENCY WITH THE COMPREHENSIVE PLAN:

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

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

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

*Policy MB 1.2.2 – Traffic Calming* – The proposed project would prevent cut-through traffic since this project would have a closed circulation system with control access for residents and visitors.

*GOAL PF2 – Surface Water Management* – The proposal is intended to provide surface water management systems to prevent flooding to adjacent rights-of-way or neighboring properties. Further, the project is designed to provide large open spaces which provide impervious areas throughout the community

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

*Policy CSR 1.1.2 – Transportation Air Quality Impacts.* As discussed throughout this justification statement and as provided in the enclosed traffic study, this project allows for the co-location of

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equestrian venues and provides for quality housing within close proximity of the existing showgrounds and new equestrian facilities. This limits unnecessary conflicts and vehicle travel and allows for alternative modes of transportation to the showgrounds.

*Policy PR 1.1.1 – Recreational Land* – this policy inspires to have 10 acres of land for every 1,000 residents. This project has many acres of recreational space in the form of a golf facility, play field, and other outdoor nodes. Furthermore, the Village as of 2020 has 1281 acres of parks and recreation facilities which is over double what is needed for the population.

#### COMPLIANCE WITH FLORIDA LAW:

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

#### Section 163.3177

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

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

***RESPONSE: Consistent with subsection (I) above, the proposed project intends for additional housing at the geographical center of the Village. This project is near the existing showgrounds and new equestrian facilities and will be adjacent to the proposed The Wellington Market.***

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

***RESPONSE: This project promotes the efficient and cost-effective approach to the expansion of public infrastructure as this project is within the Village’s service areas for both water and sewer with respective mains running adjacent to the Subject Property along South Shore Boulevard.***

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

***RESPONSE: With the variety of lifestyle amenities, the community will be truly walkable. Furthermore, with the close proximity of the Subject Property to the existing showgrounds and new equestrian facilities, the intent is that residents would be able to walk or take a golf cart to the equestrian venues which creates greater connectivity to the existing multi-modal pathways.***

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(IV) Promotes conservation of water and energy.

**RESPONSE: Proximity is paramount with this development – the Wellington International showgrounds and new equestrian facilities will demand quality housing options for visitors, competitors, and other vendors. These future residents could limit travel vast distances and thereby reducing their energy consumption.**

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

**RESPONSE: The proposed infill development prevents urban sprawl and therefore preserves other, more suitable agricultural areas.**

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

**RESPONSE: The proposed development maintains significant open space with over 30 acres remaining open.**

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

**RESPONSE: The Applicant's proposal meets a significant need of the community – housing. There is a housing deficiency, and the market demand shows these dwelling units are warranted. With The Wellington Market being proposed on the west side of South Shore Blvd., this future commercial use will serve this new residential neighborhood as well as the greater community area.**

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

**RESPONSE: The pending applications are preventing urban sprawl and are an innovative development pattern based on the location of the Subject Property. The Subject Property is centrally located in the village and has the ease of access to major equestrian venues as well as regional commerce centers.**

Section 163.3180. Concurrency

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

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

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

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

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

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

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

Public Schools – While school concurrency is no longer a requirement per Policy CI 1.2.5, the school capacity determination letter (SCAD) application has been submitted to the School District of Palm Beach County for approval.

#### COMPLIANCE WITH THE CODE:

Section 5.3.3.-Comprehensive plan map/text amendments.

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

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

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

**Please see below.**

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

**A majority is required for this type of request.**

LDR SECTION 5.3.3(B) REQUIREMENTS:

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

**RESPONSE: In conformance with Article 5 of the Land Development Regulations, the proposed future land use change is due to *changed assumptions* to the level of equestrian activities and needs for housing within the village. The fractured nature of the available equestrian venues is not sustainable. To maintain its place as the true Equestrian Capital of the World, it is necessary to have supporting residential in the nearby area of the co-located existingshowgrounds and new equestrian facilities.**

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

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amendment is based must be included.

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

**RESPONSE: While Applicant is seeking an increase in residential density from 6 units (based on approved Wellington PUD master plan) to the proposed 96 units, this increase could not be achieved through the voluntary density bonus program nor from the transfer of development rights program. As mentioned here and throughout this statement, a co-locating the existing and new equestrian venues will benefit the village in its stance as the equestrian capital of the world. And to support as such, there must be quality housing within close proximity to such venues.. While not part of the Application, the Grand Prix Village South (GPVS) development that was completed in 2013 transformed the GPVS Property from 64 residential units to 16 Barn units that are non-residential and agriculturally exempt. This development created a net loss of 64 pure residential units intended to be within the equestrian domain which further contributes to the residential deficit we are attempting to address (while indirect, this is an important aside in rationalizing the increase in units).**

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

**RESPONSE: Not applicable.**

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

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

**RESPONSE: Not applicable.**

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

**RESPONSE: Not applicable.**

4. Identify, map, and justify the trade or market area for the subject property: The following



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rules may be used to identify a trade/market area. If a different approach is used, you must provide a justification for the approach taken.

- a. If a commercial small scale FLUM amendment is being requested, and if the property is more than or equal to one acre and less than or equal to three acres, using the Census Tract Map in the Appendix, draw a boundary around the property which has a radius of one and one-half miles. If the property is more than three acres and less than or equal to ten acres, draw a boundary around the property that has a radius of three miles.
- b. If an industrial small scale FLUM amendment is being requested, and if the property is more than or equal to one acre and less than or equal to two acres, using the Census Tract Map in the Appendix, draw a boundary around the property which has a radius of one and one-half miles. If the property is more than two acres, draw a boundary around the property that has a radius of three miles.

**RESPONSE: Not applicable.**

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

**RESPONSE: Not applicable.**

6. A market study is required for commercial applications and many applicants find one helpful in establishing the need for additional commercial in the area. *The Market Study area shall be determined at the mandatory pre-application meeting with Planning and Zoning staff and must include the following:*
  - a. An estimate of demand using an assessment that considers per capita dollars spent in Wellington, dollars spent per square foot of commercial space, and square foot per capita;
  - b. An estimate of supply of commercial square footage which considers the request added to the current supply, and future supply;
  - c. A comparison of estimated supply to estimated demand;
  - d. All sources of data used in the study.

**RESPONSE: Please refer to the enclosed market study for additional information.**

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LAND USE DATA:

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

**RESPONSE: Please refer to the General Application for this information.**

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

**RESPONSE: The Subject Property currently has vested concurrency for the existing equestrian activities on-site. No other exemption or reservation applies beyond this vested right.**

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

**RESPONSE: The Subject Property is part of the Wellington PUD Master Plan.**

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

**RESPONSE: Please refer to Resolution R-2013-33 and R-2013-09 for additional information.**

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

**RESPONSE: The Subject Property is within the X and AE flood zones.**

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

**RESPONSE: The Subject Property is not within a wellfield protection zone.**

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

**RESPONSE: This property is currently within the Equestrian Overlay Zoning District and Equestrian Protection Area; however, as part of this request, Applicant seeks to remove this property from the EPA and EOZD.**

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

**RESPONSE: The proposed amendment to the land use is for residential entitlement only and would be compatible with the surrounding properties to the north and east which are residential neighborhoods. Based on development patterns, this location is appropriate**

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**for a residential neighborhood.**

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

**RESPONSE: A future land use designation equestrian commercial to Residential D is consistent and compatible with the surrounding properties to the north and east which are also residential neighborhoods. Based on development patterns, this location is appropriate for a residential neighborhood.**

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

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

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

## TRANSPORTATION

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

**RESPONSE: The existing future land use trip generation is 4,472 daily trips based on Residential F and a 0.10 FAR allowed for Equestrian Commercial Recreation.**

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

**RESPONSE: The proposed future land use trip generation is 4,810 daily trips based on the 5 DU/acre allowed for Residential D. However, the applicant is proposing to restrict the**

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**maximum future land use trip generation to 2,706 daily trips by restricting the proposed dwelling units to 96 plus amenities.**

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

**RESPONSE: The net trip generation between the existing and proposed restricted potential is a reduction of 1,721 trips.**

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

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

**RESPONSE: The proposed restrictive future land use is a reduction in trips.**

5. Determine LOS with existing traffic and project traffic.
- Add the project traffic to existing traffic volumes for all roadways determined in (d.), based on the trip generation for the proposed future land use in (b). \*
  - Compare to LOS D for existing lanes.

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

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

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

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

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

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

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

**Policy MB 1.2.2 – Traffic Calming – The proposed project would prevent cut-through traffic since this project would have a closed circulation system with control access for residents and visitors.**

**Policy EQ 2.2.1 – Local Roadway Travel Lanes – With the proposed removal of the Subject Property from the EPA, this Project would comply with this policy as this policy would no longer be applicable to a non-EPA property.**

#### MASS TRANSIT

1. Identify the mass transit provider.

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

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

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

3. Identify whether the subject property has connections to the Tri-County Commuter Rail.  
**RESPONSE: From Stop 3742, a passenger can use Route 52 to go north along State Road 7 to the Village of North Palm Beach or Route 46 to go east along Forest Hill Boulevard. A passenger could also take Route 43 to the West Palm Beach Tri-Rail station.**
4. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan.  
**RESPONSE: This project is consistent with Policies MB 1.3.1 through 1.3.5. This project is creating a more effective and safe mobility network by maintaining the bridle trail and creating a multi-modal pathway.**

#### HOUSING/POPULATION

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

**RESPONSE: By using the population figure provided in the Village's comprehensive plan, the existing FLUM would represent 0 persons while the proposed FLUM would represent 1,483 persons. It is important to note that Applicant is seeking to voluntarily reduce the maximum units, which would therefore reduce the population. The new population would be 296.**

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

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- a. Current FLUM designation: The number of dwelling units that could be constructed equals the maximum permitted density under the property's current FLUM designation multiplied by the size of the property.  
**RESPONSE: There is no density based on the Equestrian Commercial Recreation FLUM designation.**
- b. Proposed FLUM designation: The number of dwelling units that could be constructed equals the maximum permitted density under the property's proposed FLUM designation multiplied by the size of the property.  
**RESPONSE: 480 units based on the proposed Residential D, however, it is important to note that Applicant seeks to voluntarily reduce the maximum units to 96.**
3. Census Tract data: Identify the Census Tract where the subject property is located.  
**RESPONSE: Census Tract 0077.59.**
4. The effect of the proposed amendment on population: This is the difference between the Proposed FLUM Designation and the Current FLUM Designation.  
**RESPONSE: 296 persons based on the 96-unit limitation.**
5. Change in number of dwelling units: Subtract the number of dwelling units at the Current FLUM designation from the number of dwelling units at the Proposed FLUM designation.  
**RESPONSE: 90 units (taking into account the 6 approved units).**
6. All proposed amendments must be reviewed for consistency with the adopted Wellington Comprehensive Plan. To support a *residential related* proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with or furthers*. (It is recommended that the applicant review the Element for such items.) For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.  
**RESPONSE: Policy LU&CD 1.1.1 – Compatible with Existing Conditions – The proposal is compatible with the surrounding area. To the north and east of the project is the Palm Beach Polo community which has a variety of housing options in the form of single-family and multi-family lots. The portions of Palm Beach Polo adjacent to the project site are Residential C and Residential D.**  
  
**Policy LU&CD 1.2.5 – Allow Limited Non-residential Uses within Residential PUDS/Districts – The proposed recreational facilities and other amenities proposed are permissible for this project as they are designed to meet the daily needs of the residents.**

#### INFRASTRUCTURE: DRAINAGE

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

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management districts.

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

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

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

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

**RESPONSE: The C-23 canal services this property. Conceptually the outfall of the stormwater system will be located along the south and east sides of the property connecting to the C-23 and C-6 canal.**

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

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

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

**RESPONSE: Applicant will adhere to the Acme Basin A requirements, and the Village of Wellington and SFWMD permit criteria. Onsite detention ponds and underground chambers will be utilized for water quality and the expansion of the existing perimeter lakes will be used for additional water quantity.**

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

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

#### INFRASTRUCTURE: POTABLE WATER

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

**RESPONSE: Wellington Utility Department.**



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

**RESPONSE: Zero feet. Property currently receives potable water from the provider.**

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

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

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

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

**RESPONSE: 0 gallons per day.**

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

**RESPONSE: 31,080 gallons per day – based on 96-unit limitation and club facilities.**

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

**RESPONSE: 31,080 gallons per day.**

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

**RESPONSE: Applicant is unaware of any inconsistencies to the comprehensive plan which would occur from this proposed amendment. Specifically, this project is consistent with Policy PF 1.1.3 and Policy PF 1.1.4 wherein this project does not exceed the projected growth demands and is consistent with the Water Supply Facilities 10-year work plan. Please see the enclosed Water/Wastewater analysis by Sexton Engineering.**

#### INFRASTRUCTURE: SANITARY SEWER

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

**RESPONSE: Wellington Utility Department.**

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

**RESPONSE: Zero feet. Property currently receives sewer service from the provider.**

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3. Identify the sanitary sewer level of service standard established by the potable water provider.  
**RESPONSE: The LOS for sanitary sewer is to maintain no less than 85 gallons per capita per day.**
4. The effect on sanitary sewer levels of service and system needs.
  - a. Current FLUM Designation: The demand for sanitary sewer based on the property's current Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in section VII.  
**RESPONSE: 0 gallons per day.**
  - b. Proposed FLUM Designation: The demand for sanitary sewer based on the property's proposed Future Land Use Map designation is calculated by multiplying the adopted level of service standard by the population identified in section VII.  
**RESPONSE: 25,160 gallons per day – based on 96-unit limitation and club facilities.**
  - c. Change in water usage: This is the difference between the Proposed FLUM Designation and the Current FLUM Designation.  
**RESPONSE: 25,160 gallons per day for sanitary sewer.**
5. Applicant must demonstrate consistency with the Sanitary Sewer Sub-Element.  
**RESPONSE: Applicant is unaware of any inconsistencies to the comprehensive plan which would occur from this proposed amendment. Consistent with Policy PF 1.1.5, this project is within the Utility Service Area. Please see the enclosed water/wastewater demand analysis by Sexton Engineering.**

#### INFRASTRUCTURE: AQUIFER RECHARGE

1. Identify whether the property is located within a prime aquifer recharge area: If the property is located east of the conservation areas, state that the property is located within both the surficial aquifer system and the Floridian aquifer system. Identify in what zone of the surficial aquifer the property is located. This information is available from the United States Geologic Survey.  
**RESPONSE: Florida aquifer and Surficial aquifer.**
2. Identify, generally, the percentage of the property that will be covered with an impervious surface: Use the following to estimate the percentage of impervious surfaces: i) low residential (1 to 4.99 dwelling units per acre) = 30 percent; ii) medium and high density residential (5 dwelling units per acre and above) = 65 percent; and iii) commercial, industrial, and institutional = 85 percent.

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**RESPONSE:** Based on the information above, approximately 30.5 acres would be impervious.

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

**RESPONSE:** Applicant is unaware of any inconsistencies to the comprehensive plan which would occur from this proposed amendment. Specifically, this project is consistent with Policy CSR 1.3.1 wherein the water resources of this project will be protected from known activities which would adversely impact the quality and quantity of public water sources.

## CONSERVATION

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

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

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

**RESPONSE:** There is no native habitat at the subject site. The lakes/canals which are existing are man-made and no endangered or threatened species would be anticipated to reasonably be present.

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

**RESPONSE:** GOAL PF2 – Surface Water Management. The proposal is intended to provide surface water management systems to prevent flooding to adjacent rights-of-way or neighboring properties. Further, the project is designed to provide large open spaces which provide impervious areas throughout the community.

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

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

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#### RECREATION AND OPEN SPACE

1. Identify the following facilities that would service the property:
  - a. Regional parks – Okeeheelee Park
  - b. District parks – Calypso Bay Water Park
  - c. Community parks – Tiger Shark Cove Park
  - d. Open space – This project will have numerous open space opportunities within the neighborhood.
2. Adopted recreation levels of service standard of \$885 of total recreational investment per capita.  
**RESPONSE: Acknowledged.**
3. The effect of the proposed FLUM amendment on regional, district and neighborhood parks.  
**RESPONSE: It is not anticipated for the proposed land use change to have any significant impact to the recreational resources of the Village or Palm Beach County.**
4. To support the proposed amendment, reference specific Objectives and/or Policies the proposed amendment is *consistent with or furthers*. For each Objective/Policy referenced, the application must explain in detail how the *individual* Objective/Policy will be furthered by the proposed amendment.  
**RESPONSE: Policy PR 1.1.1 – Recreational Land – this policy inspires to have 10 acres of land for every 1,000 residents. This project has many acres of recreational space in the form of a golf facility, play field, and other outdoor nodes. Furthermore, the Village as of 2020 has 1281 acres of parks and recreation facilities which is over double what is needed for the population.**

#### FIRE RESCUE

1. Identify the fire-rescue facility that would service the subject property: Identify the station number, the street address of the facility, and the distance in tenths of a mile of the facility from the subject property.  
**RESPONSE: Palm Beach County Fire Rescue Station 27, 3411 S. Shore Blvd., Wellington, FL. This station is approximately 0.5 miles from the project.**
2. Identify the response times from the fire-rescue station to the Subject Property: The response time, in minutes, may be determined by multiplying the number of miles from the station to the property by two.  
**RESPONSE: Response time would be anticipated to take approximately one minute.**

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

**RESPONSE: It is not anticipated that response time to the subject property would be impacted from this proposal. Notwithstanding the foregoing, there may be an increase in the number of calls per year due as an effect of the increase in dwelling units.**

#### HISTORIC PRESERVATION

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

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

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

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

#### PUBLIC EDUCATION

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

- a. Elementary Schools – **New Horizons Elementary School, 13900 Greenbriar Blvd. – 665 feet**
- b. Middle Schools – **Polo Park Middle School, 11901 Lake Worth Road – 1.4 miles**
- c. Senior High Schools – **Wellington High School, 2101 Greenview Shores Boulevard – 0.5 miles**

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

**RESPONSE: While school concurrency is not a requirement per Policy CI 1.2.5, the request is consistent with Policy CP 1.4.1, as Applicant will coordinate with PBC School District**

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**relating to the potential impact of this proposal, if necessary. Additionally, this project provides interconnectivity with the existing bridle paths, sidewalks, and multi-modal paths consistent with the intent of Policy PF 4.1.2.**

#### INTERGOVERNMENTAL COORDINATION

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

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

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

**RESPONSE: This property was annexed into the Village of Wellington.**

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

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

#### EQUESTRIAN ELEMENT

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

**RESPONSE: As stated throughout this justification statement, the existing equestrian venue will be moved to a new showgrounds venue on Pod F which would effectively double the capacity of the equestrian facilities. This action is important to strengthen the equestrian industry in Wellington. Please see the justification above for a full analysis on the importance of this amendment.**

#### Conclusion

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