

From: [Tim Stillings](#)
To: [Kelly Ferraiolo](#)
Subject: FW: Ousley Hay & Feed Project
Date: Tuesday, April 15, 2025 1:49:38 PM

Opposition...

Tim Stillings

Planning, Zoning and Building Director | Village of Wellington
12300 Forest Hill Boulevard | Wellington FL 33414
561.791.4013 | tstillings@wellingtonfl.gov

wellingtonfl.gov

From: Mat Forrest <mat@ballardpartners.com>
Sent: Tuesday, April 15, 2025 11:57 AM
To: Tim Stillings <tstillings@wellingtonfl.gov>
Subject: Ousley Hay & Feed Project

This Message originated outside your organization.

Hey Tim,

I see that the application for the Ousley Hay & Feed project has been resubmitted.

I still represent Arion holdings and Aurora Rangel, 15000 46th Ln S, Wellington, Florida 33414.

We remain opposed to the Rezoning, Site Plan, and Development Order Amendment application for the Ousley Hay & Feed project, application Plan Number: **2025-0003-DOA**

Do you have time this week for a quick call on the issue later this week? I know you're busy so let me know what's best for you.

Thanks for the help!
Mat

Mat Forrest

BALLARD | PARTNERS

201 E. Park Ave., 5th Floor
Tallahassee, FL 32301
O: 850-577-0444
M: 561-779-7003

David and Joyce McArdle
4601 Garden Point Trail
Wellington, Florida, 33414

April 18 2025

Mayor Michael J. Napoleone
Vice Mayor Tanya Siskind
Councilman John T. McGovern
Councilwoman Maria S. Antuna
Councilwoman Amanda Silvestri
Cory Lyn Cramer, Plan and Zoning Manager
Jim Barnes, Village Manager,
Tim Stillings, Planning, Zoning and Building Director
Laurie Cohen Village Attorney

Dear Honorable Mayor Michael J. Napoleone, Vice Mayor Tanya Siskind, Councilman John T. McGovern, Councilwoman Maria S. Antuna, Councilwoman Amanda Silvestri, Planning and Zoning Manager Cory Lyn Cramer, Deputy Village Manager Tanya Quickel, Assistant Village Manager Ed De La Vega, Village Manager Jim Barnes, Planning, Zoning and Building Director Tim Stillings, and Village Attorney Laurie Cohen,

We are writing to express our concerns regarding the establishment of a manure transfer site currently operated by Agricultural Blending at 14833 50th Street South. This facility, which has been confirmed as a manure transfer site during the Solid Waste Authority meeting held on April 9, 2025, is actively operating and pursuing rezoning to expand its operations.

The presence of such a facility within our residential equestrian community presents several significant concerns. Firstly, there is the potential for a negative impact on property values. The industrial nature of this operation is incompatible with the character of a neighborhood designed for residential and equestrian use.

Secondly, the increased traffic associated with the facility poses serious road safety issues. Large trucks, some reportedly exceeding permissible sizes, are regularly seen on roads such as Flying Cow Road, Indian Mound, Ousley Farm Road, 50th Street, and Palm Beach Point Boulevard. The volume and speed of these vehicles threaten the safety of residents, equestrians, and other road users. Furthermore, the continued presence of heavy trucks may accelerate the deterioration of our roads, resulting in long-term infrastructure concerns.

Environmental and health implications also warrant immediate attention. The large-scale handling of manure introduces air quality issues, including odor dispersion, which affects the quality of life for nearby residents. The proposed expansion into Biochar operations, which involves the burning of manure, could introduce additional environmental hazards. We have also observed an increase in fly populations and general sanitation concerns, and the site's proximity to local water sources raises the possibility of contamination.

From a zoning and land use perspective, the facility stands in stark contrast to the intended use of our community. The area is zoned for residential and equestrian activities, and the current and proposed operations are more appropriately classified as commercial or industrial in nature. Rezoning this property would compromise the intended purpose of the area and set a concerning precedent. As confirmed in the Solid Waste Authority meeting the 9th of April 2025, facilities of this type are considered industrial and should not be permitted within a residential zone.

We respectfully request that the Village of Wellington consider these concerns seriously as discussions of rezoning move forward. The character, safety, and environmental integrity of our community are at stake, and we urge you to act in the best interests of the residents.

At the wish in being helpful in your endeavor, could the village investigate if the 5.25-acre parcel on Benoist Farms Road be alternative to give a solution to this problem? Please see discussion from the SWA meeting held on the 9th of April 2025 (minute 38).

<https://youtu.be/sFROr4NKMKE>

We are available for further discussion and stand ready to provide any additional information or assistance required.

Sincerely,

David and Joyce McArdles

From: [Tim Stillings](#)
To: [Kelly Ferraiolo](#)
Cc: [Cory Cramer](#)
Subject: FW:
Date: Tuesday, April 15, 2025 2:35:38 PM

Tim Stillings

Planning, Zoning and Building Director | Village of Wellington
12300 Forest Hill Boulevard | Wellington FL 33414
561.791.4013 | tstillings@wellingtonfl.gov

wellingtonfl.gov

From: Gicela Mirzadeh <cicimir@gmail.com>
Sent: Tuesday, April 15, 2025 1:49 PM
To: Michael J. Napoleone <mnapoleone@wellingtonfl.gov>; Tanya Siskind <tsiskind@wellingtonfl.gov>; John McGovern <jmcgovern@wellingtonfl.gov>; Maria Antuña <mantuna@wellingtonfl.gov>; Amanda Silvestri <asilvestri@wellingtonfl.gov>; cramer@wellingtonfl.gov; Tanya Quickel <tquickel@wellingtonfl.gov>; Ed De La Vega <edelavega@wellingtonfl.gov>; Jim Barnes <jbarnes@wellingtonfl.gov>; Laurie Cohen <lcohen@wellingtonfl.gov>; Tim Stillings <tstillings@wellingtonfl.gov>
Subject:

This Message originated outside your organization.

manure project at 50th street

April 15th 2025

I am writing over the deep concern and change of life that the transfer site in 14833 50th street south is producing in my life, family and home it s not only the constant sound of trucks coming and going, or the noise they make when they unload the manure they bring, or the undeniable increase of flies, it s the odor that it dispels and is invading my quality of life. I say quality of life because I am concerned about my family's health aside from my own.

As if it were not enough, I have just learned as well that the company Agricultural Blending is seeking to expand into a BIOCHAR operation, which will involve the burning of manure. So I expect the odors will increase even more and the air my family and I breathe will be subjected to an even more toxic ambience than it already is.

Surely an operation which implies the dumping of manure and perhaps in the future its processing, is not something a city permits in a residential area. And the fact that it is an equestrian residential area surely can not justify the dumping of horse manure,

least of all in front of my home. IT IS IN FRONT OF MY HOME. IS this something that anyone would like to have in front of their home?

I ask you PLEASE to remove this site and relocate it where it will be beneficial to us all and not a HAZARD to our health and ultimately quality of life

Thank you

Sincerely

Gicela Mirzadeh
4788 Garden Point Trail
Wellington, FL 33414

From: [Tim Stillings](#)
To: [Tim Stillings](#)
Cc: [Cory Cramer](#); [Kelly Ferraiolo](#)
Subject: Fwd: Manure Facility
Date: Sunday, May 4, 2025 5:45:13 PM

Tim

Begin forwarded message:

From: Lacy Morrone-Cramer <lacymorronecramer@me.com>
Date: May 4, 2025 at 3:21:30 PM EDT
To: "Michael J. Napoleone" <mnapoleone@wellingtonfl.gov>, Jim Barnes <jbarnes@wellingtonfl.gov>, stillings@wellingtonfl.gov
Cc: Adam Cramer <equisportllc@mac.com>
Subject: Manure Facility

This Message originated outside your organization.

Dear Mayor Napoleone and Council Members,

I am writing to bring to your attention a matter of grave concern regarding the continued operation of a facility in Wellington that is being misrepresented as agriculturally exempt, when in fact, all evidence suggests otherwise.

My family has been gravely affected by this operation, odors are constant and extreme at times. Our health is being affected and our riding activities and operations are being compromised while our daughter and clients come to ride.

That traffic is insufferable, I have made complaints to the sheriffs office and only once was traffic monitored. Everyday is a battle under these circumstances.

As you should know being a municipal authority, this site has never been classified as agricultural in its use or history, and we are aware that the Village of Wellington has allowed them to operate despite this fact that is able to be confirmed at the property appraiser's office. So there is no agricultural exemption at all. Additionally, it has never functioned as a farm, and yet it has been allowed to operate as a manure transfer station, handling it in industrial quantities. On top of that in this equestrian residential zoning there is commercial activities and sales where keeping:

- Thousands of bags of shavings

- Bulk bales of hay
- Diesel storage and sales from tanks placed adjacent to a body of water

This facility does not meet agricultural exemption criteria, there should not be a business on equestrian residential zones property and it is clear that misclassification has been allowed — or overlooked — at the cost of the residents safety and trust in the Village administration. This mirrors none of the enforcement standards seen in similar cases such as the R&B Nursery on 50th Street, where it was not allowed to operate without hesitation.

Additionally, this operation poses serious health and safety risks:

- Fire hazards: No fire hydrants are on site, and fires are a known risk in facilities handling solid livestock waste.
- Environmental risks: Diesel storage near water threatens contamination.
- Storage of old tires that are known contaminants.
- Unpermitted dwellings: There appear to be trailer homes on-site without any records of septic systems or well infrastructure. How are these living conditions being permitted?

Residents have raised these issues in good faith and deserve transparency and protection, not misinformation.

We ask the Village of Wellington to enforce its own codes fairly and immediately shut down and investigate this facility, as its continued operation under false exemption creates ongoing public risk and undermines the rule of law.

Sincerely,
Adam & Lacy
267-218-3710

From: [Tim Stillings](#)
To: [Kelly Ferraiolo](#)
Cc: [Cory Cramer](#)
Subject: FW: HANDLING OF MANURE AT 14833 50TH STREET SOUTH
Date: Tuesday, April 15, 2025 2:35:18 PM

Tim Stillings

Planning, Zoning and Building Director | Village of Wellington
12300 Forest Hill Boulevard | Wellington FL 33414
561.791.4013 | tstillings@wellingtonfl.gov

wellingtonfl.gov

From: moemirz@aol.com <moemirz@aol.com>
Sent: Tuesday, April 15, 2025 2:34 PM
To: Michael J. Napoleone <mnapoleone@wellingtonfl.gov>; Tanya Siskind <tsiskind@wellingtonfl.gov>; John McGovern <jmcgovern@wellingtonfl.gov>; Maria Antuña <mantuna@wellingtonfl.gov>; Amanda Silvestri <asilvestri@wellingtonfl.gov>; cramer@wellingtonfl.gov; tquivkel@wellingtonfl.gov; Ed De La Vega <edelavega@wellingtonfl.gov>; Jim Barnes <jbarnes@wellingtonfl.gov>; Idohen@wellingtonfl.gov; Tim Stillings <tstillings@wellingtonfl.gov>
Subject: HANDLING OF MANURE AT 14833 50TH STREET SOUTH

This Message originated outside your organization.

April 15th, 2025

Dear council members,

I hope this message finds you well. I am writing to formally express my strong opposition to the proposed manure processing plant near my property located at 4788 Garden Point Trail, Wellington

While I understand the need for responsible waste management, placing such a facility adjacent to residential properties raises several serious concerns:

1 ODOR AND AIR QUALITY

Manure processing plants are known to produce strong odors, even with mitigation systems in place. This would significantly impact the quality of life for myself and my neighbors, making it unpleasant to spend time outdoors or even open windows.

2 PROPERTY VALUE IMPACT

The presence of a manure facility will almost certainly reduce property values in the surrounding area. This is not only a financial concern but also affects the long-term

stability and appeal of our community.

3 ENVIRONMENTAL AND HEALTH RISKS

Runoff, airborne particulates and other byproducts from such operations can pose risks to nearby water sources and the general health of those living close by, especially children and the elderly. May I remind you that residents in this area are on well water.

4 NOISE AND TRAFFIC

Increased truck traffic and noise from operations would disrupt the peace of what is currently a quiet, residential area.

I respectfully urge decision-makers to reconsider the proposed location and explore alternative sites better suited to industrial operations-sites that would not compromise the well-being, health, and property of nearby residents

Thank you for your attention to this matter I would appreciate the opportunity to discuss this further and participate in any public meetings or hearings related to the project

Sincerely

Mohammad Mirzadeh
4788 Garden Point Trail
Wellington, Florida 33414
moemirz@aol.com
561-723-5718

MATTHEW F. LUPARDO, P.A.

ATTORNEY AT LAW

MEMBER NEW YORK AND FLORIDA BARS

REGIONAL PROFESSIONAL BUILDING
685 ROYAL PALM BEACH BOULEVARD
SUITE 104
ROYAL PALM BEACH, FLORIDA 33411

TELEPHONE (561) 204-2988
FACSIMILE (561) 204-2989

May 22, 2025

BY EMAIL & CERTIFIED MAIL

Michael J. Napoleone
Mayor
Village of Wellington
12300 Forest Hill Boulevard
Wellington, Florida 33414
Email: MNapoleone@WellingtonFl.gov

BY EMAIL & CERTIFIED MAIL

Tanya Siskind
Vice Mayor
Village of Wellington
12300 Forest Hill Boulevard
Wellington, Florida 33414
Email: TSiskind@WellingtonFl.gov

BY EMAIL & CERTIFIED MAIL

John T. McGovern
Councilman
Village of Wellington
12300 Forest Hill Boulevard
Wellington, Florida 33414
Email: JMcGovern@WellingtonFl.gov

BY EMAIL & CERTIFIED MAIL

Maria S. Antuna
Councilwoman
Village of Wellington
12300 Forest Hill Boulevard
Wellington, Florida 33414
Email: MAntuna@WellingtonFl.gov

BY EMAIL & CERTIFIED MAIL

Amanda Silvestri
Councilwoman
Village of Wellington
12300 Forest Hill Boulevard
Wellington, Florida 33414
Email: ASilvestri@WellingtonFl.gov

OBJECTION TO PERMIT APPLICATION

2025-001-ZCON

RE Property: 4700 Garden Point Trail, Wellington, Fl 33414
 PCN#: 73-41-44-19-01-010-0010
 Legal Desc: Lot 1, Block 10, PALM BEACH POINT, according to
 the Plat thereof as recorded in Plat Book 33, Pages 133
 to 136 inclusive, of the Public Records of Palm Beach
 County, Florida.
 Our File No.: RE 25-380
 Permit No.: 2025-0001-ZCON/14833 50th Street South

Dear Village of Wellington Council Members,

I legally represent Neil and Deborah Rego, the owners of the above-referenced Property. The intent of this correspondence is to put the Village of Wellington ("Village") on notice that my clients oppose the above-referenced permit application for the proposed expansion of the manure blending and transfer station located at 14833 50th Street South. Furthermore, my clients also want to state their objection to the concomitant paving and expansion of 50th Street to support the material increase in manure processing contemplated by this permit application.

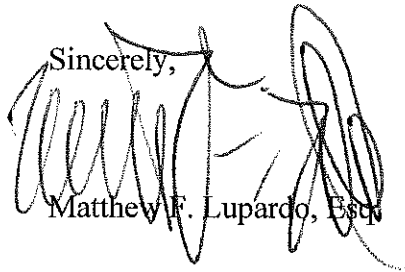
Importantly, I have included the legal description and parcel control number of my clients' property to allow the Village to confirm the very close proximity of their residence to the manure station and to 50th Street. The southwest corner of their property is only 496 yards from 50th Street. Currently, and without contemplated improvements, 50th Street poses a significant noise nuisance to my clients due to the increasing commercial vehicle traffic conducted thereon. This is even without the contemplated improvements necessary to handle the additional volume of commercial vehicle traffic that will inevitably result from the expansion of the manure station. The improvement of 50th Street will only create a great deal of additional noise and traffic which will inevitably degrade and diminish the high-quality equestrian quality of life and ambient that all the residents of Palm Beach Point, and the adjoining farms and homeowners associations, have come to expect and enjoy since Wellington's ascendance to the equestrian capital of the United States. As such, any increase in traffic and/or concomitant improvements to 50th Street will only severely affect the proximate residents and the Village at large.

The distance from the southeast corner of my client's property to the northwest corner of the manure processing facility is only 142 yards. With the increased capacity that the permit would allow, the mass processing of manure can only again result in further deleterious effects to the community and the Village at large, which include flies, odors, the spread of disease, and the reduction of the quality of life for all the surrounding residents.

Did anyone ever expect any part of the Village of Wellington to be a commercial mass waste processing center? Definitely not! Not the least of which the equestrian communities that support, fund, and provide horses to the Village's world-renowned horse show. Both the contemplated permit for the manual processing facility and the necessary road work to support it are overwhelmingly opposed by the residents surrounding these subject areas and the residents of the Village of Wellington at large. This can be seen by simply speaking to people, by the relevant litigation and by all the negative social media commentary these two items have garnered. Furthermore, there are multiple legal hurdles that have to be overcome in order for the Village to proceed (See Related Correspondence To Village Attached Hereto As Exhibit "A"). As such, my clients request that the permit applications for the manure processing plant be denied. Furthermore, my clients request that no improvements to increase the commercial volume of traffic conducted on 50th Street be approved and/or initiated.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew F. Lupardo', written over the printed name.

Matthew F. Lupardo, Esq.

CC: Nicolas Paillot – NicolasPaillot@Gmail.com
Nicol Ramsay – NicolDRamsay@Gmail.com
Cristina Danguillecourt – Ymas@Sandaraca.es
Dane M. Policastro – DanePolicastro@Gmail.com
Kathleen Gannon – KathleenGannon@Me.com
Rod Bryson – RodBryson@Bellsouth.net



KATIE EDWARDS-WALPOLE, P.A.

— KATIE@FLFARMLAW.COM —

January 2, 2025

Village of Wellington
Department of Planning and Zoning
Submitted Electronically via Customer Service System

SUBJ: Zoning Confirmation Letter Request
14833 50th Street South/PCN 73414429000007010 (the “Property”)

To Whom It May Concern:

This is a request for zoning confirmation letter for the above-referenced Property.

Request One: Confirm location and acreage for the two Future Land Use Designations on the Property

The Village has issued two (2) zoning confirmation letters for the Property in the past several months for the Property. Based on the attached letters, it appears that the Property’s Future Land Use Designation is Equestrian Commercial Recreation (ECR), while the Zoning District is Residential Equestrian (ER) and Equestrian Overlay Zoning District (EOZD) is EOZD-C.

However, there is a discrepancy between the recent Zoning Confirmation Letters provided by the Village. Specifically, the May 31, 2024 letter appears to indicate that the **eastern** 10-acres of the Property have a Future Land Use (FLU) designation of Residential B. The September 26, 2024 letter indicates that **western** 10.109 acres of the Property have a FLU designation of Equestrian Commercial Recreation.

Please confirm the respective location(s) and acreage for the FLU designations on the Property.

Request Two: Please confirm the maximum Floor Area Ratio for the Property

Per the Comprehensive Plan, Table LU & CD 1-1, Land Use Designations: Density and Intensity, ECR is included in the Commercial land use type; the standard maximum intensity for this land use type is 0.1 Floor Area Ratio (FAR).

The Unified Land Development Code includes Table 6.8-1 (EOZD Property Development Regulations) which provides the minimum property development standards for all subareas of the Equestria Overlay Zoning District. In that table, the maximum FAR is listed at 0.20 for EOZD-C, while the maximum FAR is 0.45 for ECR.

Please confirm the maximum FAR for the Property since the Comprehensive Plan appears to limit the maximum FAR to 0.1 and the underlying zoning on the entire site's zoning was previously confirmed as Residential Equestrian with an overlay of EOZD-C.

Request Three: Please confirm the Functional Classification of 50th Road South

Per the Comprehensive Plan Policy LU & CD 1.3.3, Equestrian Commercial Recreation Land Use:, the Equestrian Commercial Recreation (ECR) land use designation is intended to accommodate commercially-oriented uses, such as arenas/stadiums, show ring facilities, and commercial stables, and equestrian-oriented commercial uses, such as veterinary clinics, feed stores, tack shops. Equestrian Commercial Recreation land use is limited to the Equestrian Preserve Area, located with frontage on an arterial or collector roadway, and limited to a maximum intensity of 0.10 FAR. The Comprehensive Plan includes a map of the major roads (i.e., arterial and collector) as part of the Mobility Element. The ULDC also contains a map depicting the Functional Roads Classification.

Please confirm the classification of the portion of 50th Road South that fronts the Property. Please confirm whether the commercial uses are permitted on the Property despite the limitation contained in the Comprehensive Plan directing "commercially-oriented uses" within the EPA to those with frontage on an arterial or collector roadway.

Request Four: Please confirm that commercially-oriented uses are permitted on the Property

It appears that the Property was not rezoned to Equestrian Commercial Recreation after the Future Land Use Map designation was changed in 2005 at the request of a prior owner. Please confirm that, although the Future Land Use designation is ECR, the specific zoning district and land development regulations governing development and use of the Property are Residential Equestrian (ER) and EOZD-C.

Request Five: Please confirm that land in the Residential Equestrian zoning district may have a Future Land Use of Equestrian Commercial Recreation

The land development regulations indicate that the Residential Equestrian (ER) zoning is consistent with the Residential A and B Future Land Use Map designation in the Land Use Element of the Comprehensive Plan that are located within the EPA. Please confirm whether rezoning the portion of the Property with a FLU of ECR is required if the existing or proposed use(s) of the Property is commercial.

Request Five: Please confirm that ECR is a zoning district as well as a Future Land Use designation; confirm what uses qualify as limited, non-residential equestrian services

Sec. 6.1.1. - Purpose and intent.

The purpose of this section is to *establish zoning districts and regulations to ensure that development is compatible with surrounding uses*, served by adequate public facilities, sensitive to natural resources, and *consistent with the Comprehensive Plan. All*

development and uses within each district shall comply with LDR and specific zoning district regulations. (Emphasis added.)

D. Residential Equestrian (ER): The ER district is established to protect and enhance the equestrian lifestyle and quality of life of residents in areas designated as equestrian residential, to protect watersheds and water supplies, and scenic areas, conservation and wildlife areas, and to permit a variety of uses that require non-urban locations but ***do not operate to the detriment of adjoining lands devoted to equestrian and residential purposes. The ER district is consistent with the Residential A and B Future Land Use Map designation in the Land Use Element of the Comprehensive Plan that are located within the EPA.*** (Emphasis added.)

K. Equestrian Commercial Recreation (ECR): The purpose and intent of the Equestrian Commercial Recreation district is to provide regulations for those properties that contain equestrian commercial arenas/venues ***and/or limited*** non-residential equestrian services that support the equestrian community. ***This district is located within the Equestrian Overlay Zoning District and is compatible with the Equestrian Commercial Recreation Future Land Use Map designation of the Land Use Element of the Comprehensive Plan.*** (Emphasis added.)

The above-excerpt from the Unified Land Development Code appears to limit the types of uses zoned ECR to the following uses: (1) equestrian commercial arenas/venues and (2) limited non-residential equestrian services.

Please confirm what qualifies as “limited” under the land development regulations. Please confirm that the Property may conduct commercial activities year-round on the Property without the need to rezone all or portions thereof to ECR.

Request Six: Please confirm the number of tractor trailers that may be stored on the Property

Section 6.8.9 of the ULDC provides that: “The following equestrian use regulations shall apply to all uses and structures within the EPA.

A. Agricultural retail/service:

1. All storage areas shall be enclosed or completely screened from view. Tractor trailers used for the transport of bona fide agricultural products may be stored on the property. A maximum of five tractor trailers may be stored outside if they are completely screened from view from all public and private roads and adjacent properties.

Properties with a future land use map designation of equestrian commercial recreation ***and*** approved as a major equestrian venue are exempt from the provisions of this section except for screening. (Emphasis added.)

Please confirm whether the land development regulations concerning storage and screening applies to all or portions of the Property.

Request Seven: Please confirm whether the Property may be used as a major equestrian venue without rezoning to ECR and without obtaining a conditional use approval, site plan approval, etc.

M. Major equestrian venue:

1. The minimum lot size shall be 25 acres, unless the sole use is as a major polo venue then the minimum lot size shall be 15 acres.
2. *The primary point of access shall be from 50th Street, Lake Worth Road, Pierson Road, 120th Street, or South Shore Blvd.*
3. *A plan of operation shall be submitted with the conditional use application.*
4. *Any incompatibility with surrounding uses shall be satisfactorily mitigated with the plans submitted with the conditional use application. Conditions may be imposed with the approval including, but not limited to, controlling objectionable odors, fencing, noise, inspections, reporting, monitoring, preservation areas, mitigation and/or limits of operation. Landscape hedges and/or screens with a minimum opacity shall be required with the approval if they are necessary to mitigate for compatibility. (Emphasis added.)*

Request Eight: Please confirm that the Village's Comprehensive Plan authorizes commercially-oriented uses or rezoning to ECR on the Property if there is no frontage on an arterial or collector roadway.

The land development regulations for a major equestrian venue appear to conflict with the frontage requirements contained in Comprehensive Plan Policy LU & CD 1.3.3, Equestrian Commercial Recreation Land Use: Apply the Equestrian Commercial Recreation (ECR) land use designation to accommodate *commercially-oriented uses, such as* arenas/stadiums, show ring facilities, and commercial stables, and equestrian-oriented commercial uses, such as veterinary clinics, feed stores, tack shops. Equestrian Commercial Recreation land use is *limited* to the Equestrian Preserve Area, *located with frontage on an arterial or collector roadway*, and limited to a maximum intensity of 0.10 FAR. (Emphasis added.)

Request Nine: Please confirm whether certain solid waste-related uses are permitted on the Property by right, special use, or conditional use

Sec. 6.2.1. - General.

A. Uses permitted by right, as a special use, or conditional use shall be determined as listed in the use regulation schedule (Table 6.2-1). All uses included in the use regulation schedule shall be limited to the districts in which they appear as permitted, special use, or conditional use on the table. Any use not reflected for any particular district shall be prohibited in the district.

B. Uses listed are those uses that are compatible and functional within a given zoning district. In the event that any particular proposed use is not shown anywhere in the use regulation schedule, the PZB director shall determine what listed use is most similar to the use not specifically listed in the use regulation schedule and that use shall be classified as such in accordance with the interpretation and appeals criteria in the LDR.

Here is a description of the uses, by reference definitions provided in Florida Statute 403.703:

"Processing" means any technique designed to change the physical, chemical, or biological character or composition *of any solid waste so as to render it safe for transport*; amenable to recovery, storage, or recycling; safe for disposal; *or reduced in volume or concentration*.

"Solid waste" means sludge unregulated under the federal Clean Water Act or Clean Air Act, sludge from a waste treatment works, water supply treatment plant, or air pollution control facility, *or* garbage, rubbish, refuse, special waste, or other discarded material, *including* solid, liquid, semisolid, or contained gaseous material *resulting* from domestic, industrial, commercial, mining, *agricultural*, or governmental operations.

"Solid waste management facility" means any solid waste disposal area, *volume reduction plant*, *transfer station*, materials recovery facility, or other facility, the purpose of which is resource recovery or the disposal, recycling, processing, or storage of solid waste.

"Source separated" means that the *recovered materials are separated from solid waste* at the location *where* the recovered materials *and* solid waste are *generated*. For purposes of this subsection, *the term "various types of recovered materials" means* metals, paper, glass, plastic, textiles, and rubber.

"Transfer station" means a site the primary purpose of which is to store or hold solid waste for transport to a processing or disposal facility.

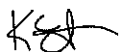
"Volume reduction plant" includes incinerators, pulverizers, compactors, shredding and baling plants, composting plants, and other plants that accept and process solid waste for recycling or disposal.

Please confirm that the land development regulations authorize the Property to be used as a (1) transfer station; (2) solid waste management facility; (3) volume reduction plant (i.e., manure blending); (4) processing of solid waste; (5) generating and separating metals, paper, glass, plastic, textiles, and rubber from other types of solid waste, i.e. source separated; (6) retail sales of hay and other products.

Request Ten: Please confirm which zoning districts may be used for horse waste disposal and disposal alternatives

Policy EQ 1.2.1 of the Comprehensive Plan deals with Horse Waste (Disposal Alternatives), specifically: Continue to investigate alternatives for horse waste disposal that have reduced environmental impacts, reduced hauling demands, and sustainable reuse solutions, potentially through a corporative regional approach, which can be supported by Wellington.

Sincerely,



Katie Edwards-Walpole, Esq.
FOR THE FIRM

Palm Beach Point POA

c/o FirstService Residential

999 Yamato Road, STE 105

Boca Raton, Florida 33431

April 14, 2025

Mayor Michael J. Napoleone

Vice Mayor Tanya Siskind

Councilman John T. McGovern

Councilwoman Maria S. Antuna

Councilwoman Amanda Silvestri

Cory Lyn Cramer, Plan and Zoning Manager

Jim Barnes, Village Manager,

Tim Stillings, Planning, Zoning and Building Director

Laurie Cohen Village Attorney

Dear Honorable Mayor Michael J. Napoleone, Vice Mayor Tanya Siskind, Councilman John T. McGovern, Councilwoman Maria S. Antuna, Councilwoman Amanda Silvestri, Planning and Zoning Manager Cory Lyn Cramer, Deputy Village Manager Tanya Quickel, Assistant Village Manager Ed De La Vega, Village Manager Jim Barnes, Planning, Zoning and Building Director Tim Stillings, and Village Attorney Laurie Cohen,

We are writing to express our concerns regarding the establishment of a manure transfer site currently operated by Agricultural Blending at 14833 50th Street South. This facility, which has been confirmed as a manure transfer site during the Solid Waste Authority meeting held on April 9, 2025, is actively operating and pursuing rezoning to expand its operations.

The presence of such a facility within our residential equestrian community presents several significant concerns. Firstly, there is the potential for a negative impact on property values. The industrial nature of this operation is incompatible with the character of a neighborhood designed for residential and equestrian use.

Secondly, the increased traffic associated with the facility poses serious road safety issues. Large trucks, some reportedly exceeding permissible sizes, are regularly seen on roads such as Flying Cow Road, Indian Mound, Ousley Farm Road, 50th Street, and Palm Beach Point Boulevard. The volume and speed of these vehicles threaten the safety of residents, equestrians, and other road users. Furthermore, the continued presence of heavy trucks may accelerate the deterioration of our roads, resulting in long-term infrastructure concerns.

Environmental and health implications also warrant immediate attention. The large-scale handling of manure introduces air quality issues, including odor dispersion, which affects the quality of life for nearby residents. The proposed expansion into Biochar operations, which involves the burning of manure, could introduce additional environmental hazards. We have also observed an increase in fly populations and general sanitation concerns, and the site's proximity to local water sources raises the possibility of contamination.

From a zoning and land use perspective, the facility stands in stark contrast to the intended use of our community. The area is zoned for residential and equestrian activities, and the current and proposed operations are more appropriately classified as commercial or industrial in nature. Rezoning this property would compromise the intended purpose of the area and set a concerning precedent. As confirmed in the Solid Waste Authority meeting the 9th of April 2025, facilities of this type are considered industrial and should not be permitted within a residential zone.

We respectfully request that the Village of Wellington consider these concerns seriously as discussions of rezoning move forward. The character, safety, and environmental integrity of our community are at stake, and we urge you to act in the best interests of the residents.

At the wish in being helpful in your endeavor, could the village investigate if the 5.25-acre parcel on Benoist Farms Road be alternative to give a solution to this problem? Please see discussion from the SWA meeting held on the 9th of April 2025 (minute 38).

<https://youtu.be/sFROr4NKMKE>

We are available for further discussion and stand ready to provide any additional information or assistance required.

Sincerely,

Palm Beach Point Board of Directors

From: [Tim Stillings](#)
To: [Kelly Ferraiolo](#); [Cory Cramer](#)
Subject: Fwd: Manure Transfer Site
Date: Friday, May 2, 2025 10:46:33 AM

Thanks,
Tim

Begin forwarded message:

From: bibi shah <bibi904@hotmail.com>
Date: May 1, 2025 at 7:51:46 PM EDT
To: Amanda Silvestri <asilvestri@wellingtonfl.gov>
Subject: Manure Transfer Site

This Message originated outside your organization.

Dear Councilwoman Amanda Sylvestri,

I'm writing to you about the manure transfer site at 14833 50th Street South, currently run by Agricultural Blending.

Florida has setback regulations for manure storage and handling, including transfer sites, to protect residential areas and water resources. These rules generally require a minimum distance between the site and residences, as well as other water bodies and utilities. Even if the site technically meets the minimum setback regulations, the odor produced by disposing of manure is a product of this site and does not meet the Florida setback regulations. The odor travels well beyond the setback regulations for manure storage and handling, including transfer sites, to protect residential areas and water resources.

No one should have to be dealing with such an

overwhelming stench on a regular basis. Would you want this in your backyard? It would make more sense both logistically and logically to move the Manure Transfer site closer to the showground's south expansion site. The current Manure Transfer site is not in an appropriate location for this kind of business in view of the odor, the environmental risks, and the safety concerns.

Please ensure the site is relocated to a more appropriate location.

Sincerely,

Rebecca

Sent from [Outlook](#)

From: [Cory Cramer](#)
To: [Kelly Ferraiolo](#)
Cc: [Tim Stillings](#)
Subject: FW: Fwd:
Date: Saturday, April 19, 2025 10:53:07 AM
Attachments: [image002.png](#)

Kelly:

Here is another letter for the file.

Sincerely,



Ms. Cory Lyn Cramer, AICP

Planning and Zoning Manager | Village of Wellington
12300 Forest Hill Boulevard | Wellington, Florida 33414
561.791.4012 | ccramer@wellingtonfl.gov

wellingtonfl.gov



From: Sarah Goos <shadysidestable@gmail.com>
Sent: Saturday, April 19, 2025 10:29 AM
To: Jonathan Reinsvold <jreinsvold@wellingtonfl.gov>; John McGovern <jmcgovern@wellingtonfl.gov>; Michael J. Napoleone <mnapoleone@wellingtonfl.gov>; Maria Antuña <mantuna@wellingtonfl.gov>; Amanda Silvestri <asilvestri@wellingtonfl.gov>; Cory Cramer <CCramer@wellingtonfl.gov>; Jim Barnes <jbarnes@wellingtonfl.gov>; Tim Stillings <tstillings@wellingtonfl.gov>
Cc: Tanya Siskind <tsiskind@wellingtonfl.gov>
Subject: Fwd:

This Message originated outside your organization.

Begin forwarded message:

From: Sarah Goos <shadysidestable@gmail.com>
Date: April 16, 2025 at 8:01:37 PM EDT
To: Sarah Goos <shadysidestable@gmail.com>

Dear Council members,

Sun Glade Point Association opposes the proposed expansion of the manure blending and transfer station located at 14833 50th Street South . This transfer and blending station sits in the middle of our neighborhood. As farm and homeowners that value the unique rural and equestrian character of our community, we feel strongly that this expansion would be deeply detrimental to the quality of life for residents and horse owners alike.

The current facility already poses a range of serious concerns, and expanding its operations would only exacerbate the issues we face daily. Increased levels of odor, flies, and dust have already become a persistent problem for nearby homes and farms. The noise from industrial trucks, which run throughout the day, disrupts the peace and tranquility that Wellington is known for—especially in equestrian areas where animals require a calm, safe environment.

Further, the additional traffic created by this facility is both unnecessary and hazardous. Our local roads were not designed to handle this kind of heavy truck use, and the constant flow of industrial vehicles presents safety risks for riders, pedestrians, and residents. This type of commercial operation is fundamentally incompatible with a neighborhood so closely tied to equestrian life and open space.

I respectfully urge you and the Village Council to reconsider and oppose this expansion. Protecting the character and health of our neighborhoods should take precedence over the growth of a facility that negatively impacts our community.

Thank you for your attention to this matter. We are happy to speak further if needed, and we appreciate your commitment to serving the interests of Wellington residents.

Fondly,

Sun Glades Point Board Members

Sent from my iPhone

From: [Tim Stillings](#)
To: [Laurie Cohen](#); [Rachel Bausch](#); [Cory Cramer](#); [Kelly Ferraiolo](#)
Subject: Fwd: Plan Numbers 2025-0003-DOA, 2025-0003-SP, 2025-0002-REZ; Public Comment for the Record
Date: Wednesday, October 29, 2025 10:25:06 AM
Attachments: [image001.png](#)
[We sent you safe versions of your files.msg](#)

Tim

Begin forwarded message:

From: Katie Edwards-Walpole <Katie@flfarmlaw.com>
Date: October 29, 2025 at 10:19:10 AM EDT
To: Village Clerk <villageclerk@wellingtonfl.gov>
Cc: Tim Stillings <tstillings@wellingtonfl.gov>, Katie Edwards-Walpole <Katie@flfarmlaw.com>, Sara Baxter <SBaxter@pbc.gov>, "Lisa Amara A." <lamara@pbc.gov>, "Garner, Sean" <sean.garner@fdacs.gov>
Subject: Plan Numbers 2025-0003-DOA, 2025-0003-SP, 2025-0002-REZ; Public Comment for the Record

Mimecast Attachment Protection was unable to create safe copies of your attachments.

This Message originated outside your organization.

Dear Madame Clerk:

I understand that the following applications may be placed before the Equestrian Preserve Committee at its November 5, 2025, meeting: Plan Numbers 2025-0003-DOA, 2025-0003-SP, 2025-0002-REZ. Please accept and file this written comment and attachment for the record, on behalf of Arion Holdings, L.L.C., the owner of property located at 15000 46 Lane South in Wellington.

The applicant asks the Village to call a duck swimming in a pond a water turkey. Why? If it looks like a duck, swims like a duck, and quacks like a duck, it's a duck.

Florida Statute 403.7043 expressly prohibits, a county or a municipality from adopting by ordinance any definition that is inconsistent with the definitions in s. 403.703, Fla. Stat. Any application that urges the Village to create or expand the definitions for solid waste terms **defined by the Legislature** must be rejected, including, 'agricultural transshipment facility', 'mixing station', 'source separated organics processing facility', and 'blending facility'.

Sec. 3.2.1 of the Village's Land Development Regulations is equally clear: Terms used in these regulations **shall** have the meanings prescribed by the Florida State Statutes for the same terms. Some technical terms which are unique to an article may be defined within the respective article.

The **Florida Legislature** defines 'transfer station' as a site, the primary purpose of which is to store or hold solid waste for transport to a processing or disposal facility. § 403.703(43), Fla. Stat. We are not dealing with an activity or land use that is so unique that the Village needs adopt any ordinance containing definitions inconsistent with § 403.703, Fla. Stat. The Fourth District Court of Appeal knows how to apply the statutory-defined terms for consistency:

Generally, solid municipal waste disposal involves a three-stage process. The first stage is "hauling." During the hauling stage, local capacity collection trucks pick up waste from commercial and residential customers. The second stage is the "transfer stage," during which collection trucks bring the waste to a transfer station, where it is combined, compacted, loaded onto larger capacity tractor trailers, and transported to a disposal facility. The third and final stage is "disposal." During the disposal stage, the waste is deposited at a landfill or incineration facility. The transfer stage is necessary because disposal sites are often far away from collection sites. Since the transfer stage tractor-trailer trucks have greater carrying capacity than the collection trucks, this middle step makes long-distance waste transportation more efficient. ***Okeechobee Landfill, Inc. v. Republic Servs. of Fla., Ltd. P'ship***, 931 So. 2d 942, 943 (Fla. 4th DCA 2006),

So why is the applicant urging the Village to ignore Florida law, and moreover, why is the Village continuing to allow the applicant to move ahead, knowing, it's a manure transfer station. The agency records from the Solid Waste Authority are attached. In March 2023, the site inspector notes in her comments the facility is solely a manure transfer station. If a picture is worth a thousand words, these speak volumes.

The Village of Wellington has no statutory authority to extend, contradict, create, or depart from the terms and definitions governing solid waste, including the statutory definition of 'solid waste' which **includes** garbage, rubbish, refuse, special waste, or other discarded material, including solid, liquid, semisolid, or contained gaseous material **resulting from agricultural operations**. § 403.703(38), Fla. Stat.

Finally, the Arion property is enrolled in the Equine Best Management Practices and has executed its Notice of Intent to implement, under the 2024 revisions: [Florida Equine Operations Water Quality and Water Quantity Best Management Practices](#). The proximity of the Arion property to the facility raises questions

about Equine BMP implementation assurance, given the amount of horse manure collected by the applicant from horse farms. Under the attached Memorandum of Agreement, the Florida Department of Agriculture and Consumer Services retained the final authority regarding disputes.

Maybe we are dealing with ducks after all, and the Legislature and courts know the difference between a duck and a decoy. Does the Village of Wellington?

Regards,
Katie Edwards-Walpole

Cc: Tim Stillings, AICP, Planning, Zoning & Building Director, Village of Wellington
Sean Garner, Esq., Florida Department of Agriculture and Consumer Services
Lisa Amara, Director of Zoning, Palm Beach County
Vice Mayor Sara Baxter, Palm Beach County/Chairman of the Board, Solid Waste Authority of Palm Beach County