

**PALM BEACH COUNTY
PLANNING, ZONING AND BUILDING DEPARTMENT
ZONING DIVISION**

Application No.: CA-2020-01215
Application Name: Memory Care at the Acreage
Control No./Name: 2017-00042 (Moore Project)
Applicant: Moore Florida Property Investment, LLC
Owners: Moore Florida Property Investment, LLC
Agent: Gentile Glas Holloway O'Mahoney & Assoc., Inc. – George Gentile
Telephone No.: (561) 575-9557
Project Manager: Travis Goodson, Planner II

TITLE: a Class A Conditional Use **REQUEST:** to allow a Type 2 Congregate Living Facility.

APPLICATION SUMMARY: Proposed is a Class A Conditional Use for the Memory Care at the Acreage development. The 1.60-acre subject site is has no prior Zoning approvals and is currently vacant. On November 24, 2020, the site was granted a Reasonable Accommodation to allow for a 0.92-acre reduction of the minimum lot size requirement.

The Applicant is proposing to develop a Type 2 Congregate Living Facility (CLF). The Preliminary Site Plan (PSP) indicates a single-story building comprised of 9,367 square feet (sq. ft.); 14 residents/beds; six parking spaces plus one drop-off space; and, 1,525 sq. ft. of on-site recreation. Access to the site will be provided by a single driveway connection from Northlake Boulevard.

SITE DATA:

Location:	North side of Northlake Boulevard, approximately 1,100 feet west of Grapeview Boulevard.
Property Control Number:	00-41-42-17-00-000-7910
Existing Future Land Use Designation:	Rural Residential, 2.5 units per acre (RR-2.5)
Proposed Future Land Use Designation:	Rural Residential, 2.5 units per acre (RR-2.5)
Existing Zoning District:	Agricultural Residential (AR)
Proposed Zoning District:	No Change
Total Acreage:	1.6 acres
Affected Acreage:	1.6 acres
Tier:	Exurban
Overlay District:	N/A
Neighborhood Plan:	Acreage Neighborhood Plan
CCRT Area:	N/A
Municipalities within 1 Mile	Palm Beach Gardens
Future Annexation Area	N/A

RECOMMENDATION: Staff recommends approval of the request, subject to the Conditions of Approval as indicated in Exhibit C.

PUBLIC COMMENT SUMMARY: At the time of publication, Staff had received 1 contact from the public regarding this application, indicating concerns regarding building size, trash pickup, and noise and light pollution.

PROJECT HISTORY: The subject site is currently vacant and undeveloped.

REASONABLE ACCOMODATION: The Applicant submitted a Reasonable Accomodation (RA) application to the Zoning Division in accordance with ULDC Art. 2.C.5.F, Reasonable Accomodation. The requested RA sought to allow a 0.92 acre reduction from the minimum 2.5-acre lot size, as required by Art. 4.B.1.C.1.g, Lot Size for a Type 2 CLF. The RA was approved by the Zoning Division on November 24, 2020, concluding that, based upon review of the application submitted and Staff's finding of facts, the request was reasonable given that the surrounding area consists of similarly sized

non-conforming parcels that are undeveloped or support residential uses. The referenced RA Approval Letter can be found in Figure 7 of this report.

SURROUNDING LAND USES:

NORTH (across Indian Trails Improvement District Canal):

FLU Designation: Rural Residential, 2.5 units per acre (RR-2.5)
Zoning District: Agricultural Residential (AR)
Supporting: Residential (No Control Name and No.)

SOUTH (across Northlake Boulevard):

FLU Designation: Rural Residential, 2.5 units per acre (RR-2.5)
Zoning District: Agricultural Residential (AR)
Supporting: Residential (No Control Name and No.)

EAST:

FLU Designation: Rural Residential, 2.5 units per acre (RR-2.5)
Zoning District: Agricultural Residential (AR)
Supporting: Agricultural (No Control Name and No.)

WEST (across ITID Canal):

FLU Designation: Rural Residential, 2.5 units per acre (RR-2.5)
Zoning District: Agricultural Residential (AR)
Supporting: Residential (No Control Name and No.)

FINDINGS:

Conditional Uses, Official Zoning Map Amendment to a PDD or TDD and Development Order Amendment:

When considering a Development Order application for a Rezoning to a PDD or a TDD, a Conditional Use, excluding Conditional Use requests for Density Bonus pursuant to Art. 5.G.1, Workforce Housing Program (WHF), or a Development Order Amendment, the BCC and ZC shall utilize the Standards a – h listed in Article 2.B.7.B, Standards. The Standards and Staff Analyses are indicated below. A Conditional Use, Rezoning to PDD or TDD, or Development Order Amendment that fails to meet any of these Standards shall be deemed adverse to the public interest and shall not be approved.

- a. **Consistency with the Plan** – *The proposed use or amendment is consistent with the purposes, goals, objectives and policies of the Plan, including standards for building and structural intensities and densities, and intensities of use.*

PLANNING DIVISION COMMENTS:

- o *Consistency with the Comprehensive Plan:* The proposed use or amendment is consistent with the Goals, Objectives and Policies of the Comprehensive Plan, including previous Land Use Amendments, densities and intensities of use.
- o *Prior Land Use Amendments:* The site was the subject of a County Initiated Large Scale amendment known as Exurban Tier Revisions (00-14 RR-1 (Acreage)), which amended the Future Land Use from Rural Residential 1 unit per 10 acres (RR-10) to Rural Residential 1 unit per 2.5 acres (RR-2.5) via Ordinance 2000-56 with no conditions.
- o *Relevant Comprehensive Plan Policies:* The site is located along Northlake Boulevard and is subject to Transportation Element (TE) Policy 1.4-q.1., which requires a 50-foot Rural Parkway easement to be dedicated exclusively for multipurpose paths. The parkway concept intends to protect the rural character of areas outside of the Urban Suburban Tier. The proposed plans show a 50-foot Rural Parkway easement to be dedicated. Additionally, the applicant has submitted a draft Rural Parkway Plan and Management Plan that will outline how the parkway will be designed, managed and maintained. The applicant has proposed to maintain the parkway with 100% native vegetation to maintain consistency with the rural character of the area.

○ *Intensity:* The maximum Floor Area Ratio (FAR) of .20 is allowed for a project with a Rural Residential, 1 unit per 2.5 acres (RR-2.5) FLU designation in the Exurban Tier (69,696 square feet or 1.60-acres x .20 maximum FAR = 13,939.2 square feet maximum). The request for a total of 9,367 square feet equates to a FAR of approximately 0.13 (9,367 / 69,696 square feet or 1.60 acres = 0.134).

○ *Special Overlay District/ Neighborhood Plan/Planning Study Area:* The property is located within the Acreage Neighborhood Plan (ANP) area. The applicant was advised to reach out to the neighborhood group responsible for implementing the Neighborhood Plan to inform them of the request. The Agent sent an email dated January 29, 2021 to the Board of the Acreage Landowners Association. To date, no comments have been received by staff.

The site is also within the boundaries of the Western Northlake Corridor Land Use Study (WNCLUS), recognized under FLUE Policy 4.1-c, which states that the County shall consider the objectives and recommendations of Community Plans and Interlocal Service Boundary Agreements. The WNCLUS was a collaborative effort between the County, The City of Palm Beach Gardens and the City of West Palm Beach as a result of ongoing development pressures in this area of the County. The Study was published June 8, 1998 (Interlocal Agreements were executed on September 16, 1998, November 5, 1998, January 11, 1999, and April 20, 1999, plus subsequent Memoranda of Understanding (MOU) between the Planning Directors in 2007-08), and specifically addressed development potential along the corridor through a planning horizon of 2015. The WNCLUS does not speak to CLF uses, and is silent on the issue. Furthermore, should the use be regarded as “institutional,” the WNCLUS indicates that Institutional uses are encouraged within the study area boundaries to meet the needs of the population and that locations along Northlake Boulevard, where expansion of the roadway will eventually be six lanes may, be appropriate for institutional development (p. 50, WNCLUS). However, since the last efforts made on the WNCLUS, over 10 years ago, several large scale developments were approved in this region of the County. This includes the 4,700+ acre Avenir development within the municipal limits of the City of Palm Beach Gardens that includes over 3,000 dwelling units and 2.5 million square feet of non-residential intensity, approved by the city in May 2016. The City of Palm Beach Gardens submitted a letter of objection dated March 20, 2020. The objections relate to Traffic, access and intensity of the uses proposed. The alignment of Northlake Boulevard, the intersection of Northlake Boulevard and Coconut Boulevard and required improvements may directly affect the proposed access points and subsequent internal circulation. The City also indicated the intensity is too great in comparison to the surrounding communities.

b. Consistency with the Code - *The proposed amendment is not in conflict with any portion of this Code, and is consistent with the stated purpose and intent of this Code.*

○ *Property Development Regulations:* In accordance with Art. 4.B.C.1.g, Lot Size, the minimum lot area for a Type 2 CLF shall be 8,000 sq. ft. or the zoning district minimum lot requirement, whichever is greater. As previously noted, the subject site received an RA on November 24, 2020 to allow for the existing lot size to be permitted. Regarding additional minimum lot dimensions for a property within the AR district, Table 3.D.1.A, Property Development Regulations, Note 4, states that AR lots with an RR 2.5 FLU designation may utilize the Residential Estate (RE) PDRs. As such, the minimum width, frontage and depth for the lot is 200 feet, which the subject site meets.

With regards to setbacks and maximum lot coverage, the proposed building meets the minimum front, side and rear setbacks for parcels utilizing the RE PDRs, and the building coverage is proposed at 14 percent, which is below the 20% maximum.

○ *Use Regulations, Type 2 Congregate Living Facility:* The proposed Type 2 CLF is classified as a Residential Use per Article 4.B.1.A, Residential Use Matrix. The proposed Type 2 CLF complies with all required Supplementary Use Regulations as outlined in Art. 4.B.1.C.1, Congregate Living Facility, as follows:

- **Maximum Occupancy:** A Type 2 CLF is permitted to have a maximum of 14 residents, excluding Staff. The Applicant indicates a proposal for 14 residents, and further specifies an intent to provide memory care services to residents with conditions associated with Alzheimer’s and dementia.
- **Lot Size:** As noted above, the Applicant received approval for a Reasonable Accommodation to reduce the minimum lot size, and thereby satisfies this requirement.

- Fire Rescue Station: A Type 2 CLF shall be located within five miles of a full service fire rescue station. The subject site is located approximately 4.5 miles from Palm Beach County Fire Rescue Station 26. The Applicant also submitted a letter from PBCFR confirming availability of services for the project location.
- Drop Off Area: One drop off space has been provided adjacent to the proposed structure.
- Signage: No signage is proposed for this project.
- Emergency Generators: A permanent emergency generator is required for all Type 2 CLFs and shall meet the standards of Art. 5.B.1.A.19, Permanent Generators. The PSP indicates a permanent emergency generator located on the east side of the building with screening as required. At time of application for a Building Permit, the additional specific requirements outlined in Art. 5 shall be reviewed for compliance.

○ *Architectural Review:* Architectural elevations have not been provided with this application. Due to the proposed use and residential classification, a Type 2 CLF is not subject to architectural review under Art. 5.C, Design Guidelines.

○ *Parking and Loading:* Per Art. 6.B.1.B, Minimum Parking and Loading Requirements, the proposed 14 resident Type 2 CLF with 393 sq. ft. of accessory office space requires 6 parking spaces and 1 drop off space. The PSP indicates 6 spaces provided and 1 drop off space located on the south side of the building. In accordance with Art. 6.E.2.B.1, Standard “A” and Table 6.E.4.A, Dimensions [both referring to Loading Standards], the proposed Use is not required to provide a designated Loading Space since the square footage is less than 10,000 sq. ft.

○ *Landscape and Buffering:* The PSP indicates a 10-ft Type 1 Incompatibility Buffer along the north and west property lines, with an allowable 5-ft. easement overlap of drainage area. A 20-ft. Type 3 Incompatibility Buffer is proposed along the eastern property line with a 6-ft. high opaque wall setback 10 ft. from the property line. A 20-ft. Right-of-Way Buffer is proposed along the south property line, overlapping the 50-ft. Rural Parkway Easement. These buffers are to be planted to meet their corresponding requirements of Art. 7.C.2, Types of Landscape Buffers. Per Art. 7.E.2.B, Review and Permit Procedures and Art. 14.C, Vegetation Preservation and Protection , a Vegetation Disposition Plan was submitted and reviewed to ensure the preservation and incorporation of existing native vegetation on site to the greatest extent possible and mitigate accordingly where necessary. As recommended by the submitted Environmental Assessment, a small portion of the extreme northeast corner of the site has been labeled as a wetland area. Through discussion with the Applicant, this is an area of the site that has experienced significant drainage issues over the years, but development of the vacant site is likely to address and/or correct such issues. ERM Staff have also confirmed that this area is degraded and non-functional, and should the wetland remain in place after development, are not opposed to installation of Code-required landscape buffers or walls within this area.

○ *Signage:* No signage is proposed as part of this request.

c. Compatibility with Surrounding Uses – *The proposed use or amendment is compatible and generally consistent with the uses and character of the land surrounding and in the vicinity of the land proposed for development.*

The proposed Type 2 CLF is a Community Residential home pursuant to Florida Statute 419.001, in which the licensed dwelling unit serves up to 14 unrelated residents. The home operates and functions equivalent to a family, with care provided by support staff. The proposed Type 2 CLF will be compatible with other single family homes and non-residential uses in the area. To the north and west, across the Indian Trails Improvement District canal, are single family homes within the AR district. To the east is a Wholesale Nursery, and to the south across Northlake Boulevard is another AR-zoned parcel that supports an existing single family home. As previously noted, the Applicant will be providing a Type 1 Incompatibility Buffer along the north and west property lines, in addition to a Type 3 Incompatibility Buffer along the eastern property line adjacent to the Wholesale Nursery. The proposed use is classified as residential and considering the aforementioned, the use is compatible and generally consistent with the uses in the vicinity.

d. Design Minimizes Adverse Impact – *The design of the proposed use minimizes adverse effects, including visual impact and intensity of the proposed use on adjacent lands.*

The proposed Type 2 CLF will be located within a new, single-story residence which, according to the Applicant's Justification Statement, will be designed as a typical single family residential structure. The structure orients itself towards Northlake Boulevard, with the required parking spaces and emergency generator located on the eastern side of the building adjacent to the Wholesale Nursery and away from adjacent residential uses to the north and west of the site.

Access to the site will be provided from Northlake Boulevard, a thoroughfare road. As indicated by the Applicant, the proposed CLF is for residents that do not drive; consequently, there will be a minimal traffic impact on the surrounding lands. The proposed use will provide 6 parking spaces, as well as a drop-off space as required for a Type 2 CLF. As noted under Standard g, Adequate Public Facilities, Traffic Engineering staff have confirmed that the number of traffic trips to the subject site will be insignificant, and do not warrant any roadway improvements.

Residential uses on the north, south and west of the proposed use will have minimal visual impacts. As previously noted, a 10-ft. Type 1 Incompatibility Buffer will be installed along the north and west property lines, which must include a 6 foot high opaque hedge or fence. A Type 3 Incompatibility Buffer will be provided along the eastern property line, which requires additional planting materials and a 6-ft. high opaque wall. As indicated on the PSP, the building will be separated from Northlake Boulevard by a 70-ft. roadway easement and a 50-ft. Rural Parkway Easement with overlap of a 20-ft. R-O-W Buffer. As further indicated under Standard a, Consistency with the Plan, and recommended Planning Conditions of Approval, the Rural Parkway Easement must be designed and maintained to emulate the natural, rural character of the corridor.

e. Design Minimizes Environmental Impact – *The proposed use and design minimizes environmental impacts, including, but not limited to, water, air, stormwater management, wildlife, vegetation, wetlands and the natural functioning of the environment.*

ENVIRONMENTAL RESOURCE MANAGEMENT COMMENTS:

- *Vegetation Protection:* The site has not been cleared and supports primarily Slash Pine and Cabbage Palm trees.
- *Wellfield Protection Zone:* The property is not located within a Wellfield Protection Zone.
- *Irrigation Conservation Concerns And Surface Water:* All new installations of automatic irrigation systems shall be equipped with a water sensing device that will automatically discontinue irrigation during periods of rainfall pursuant to the Water and Irrigation Conservation Ordinance No. 93 3. Any non stormwater discharge or the maintenance or use of a connection that results in a non stormwater discharge to the stormwater system is prohibited pursuant to Palm Beach County Stormwater Pollution Prevention Ordinance No. 93 15.
- *Environmental Impacts:* There are no significant environmental issues associated with this petition beyond compliance with ULDC requirements.

f. Development Patterns – *The proposed use or amendment will result in a logical, orderly and timely development pattern.*

The proposed use will result in a logical, orderly, and timely development pattern. The area surrounding the subject site consists of primarily residential and agricultural uses situated on lots greater than one acre in size, which is typical for this area of the county. The proposed Type 2 CLF is residential in nature, and will be developed on an existing 1.60-acre lot. The residential use and lot size are consistent with the rural neighborhood character along this section of the Northlake Corridor, and will not detract from the established development pattern.

g. Adequate Public Facilities – *The proposed amendment complies with Art. 2.F, Concurrency (Adequate Public Facility Standards).*

ENGINEERING COMMENTS:

The 14 bed memory care/nursing home facility is expected to generate 43 net daily trips, 2 net AM peak hour trips, and 3 net PM peak hour trips. The build out of the project is expected to happen by 2023.

There are no roadway improvements required to meet the Traffic Performance Standards because the impacts of the projects will be insignificant.

The Property Owner shall dedicate ROW to be consistent with the PBC Thoroughfare Identification Map prior to the issuance of the building permit.

The Property Owner shall submit a drainage study that identifies historical flows that currently enter the site prior to the Final Site Plan approved by the DRO.

PALM BEACH COUNTY HEALTH DEPARTMENT: This project meets the requirements of the Florida Department of Health.

FIRE PROTECTION: Staff has reviewed this application and have no comment.

SCHOOL IMPACTS: Staff has reviewed this application and have no comment.

PARKS AND RECREATION: The project proposes 14 beds requiring 1,525 square feet of onsite recreation, 1,525 square feet of onsite recreation is provided, therefore the recreational requirement is satisfied.

h. Changed Conditions or Circumstances – *There are demonstrated changed site conditions or circumstances provided by the Applicant’s Justification Statement that necessitate the amendment.*

A Type 2 CLF is a residential use, which provides accommodations for persons who require “...long term care, housing, food service and one or more assistive care services...” This use would explicitly exclude any care or services, which may be defined under other use classifications, such as Nursing or Convalescent Facilities.

While the County does not evaluate or consider eligibility of occupants based on type of disability as may be further protected by the American’s with Disabilities Act and Fair Housing Act, or other similar protections, the Applicant indicates in their Justification Statement that “*Palm Beach County has a significant portion of the population that is aging, and may need to take advantage of memory care services. According to the Census Bureau, approximately 21% of Palm Beach County residents are over the age 65. As Alzheimer’s and Dementia generally tend to affect that particular age group, it is important to plan for developments that will be able to serve that portion of the community.*”

The Applicant also states that the subject site is ideal for this type of care, as the quieter nature of the rural environment supports a successful memory care program. The Applicant seeks to integrate the Type 2 CLF into the subject area by providing a rural residential look and feel of the property. As such, Staff are satisfied that there are demonstrated changed circumstances as provided by the Applicant that allow for the proposed Type 2 CLF.

CONCLUSION: Staff has evaluated the standards listed under Article 2.B, and determined that there is a balance between the need for change and the potential impacts generated by this change. Staff is recommending approval of the request, subject to the recommended Conditions of Approval as indicated in Exhibit C.

CONDITIONS OF APPROVAL

Exhibit C: Class A Conditional Use (Type 2 Congregate Living Facility)

ALL PETITIONS

1. The approved Preliminary Site Plan is dated February 22, 2021. Modifications to the Development Order inconsistent with the Conditions of Approval, or changes to the uses or site design beyond the authority of the Development Review Officer as established in the Unified Land Development Code, must be approved by the Board of County Commissioners or the Zoning Commission. (ONGOING: ZONING - Zoning)

ENGINEERING

1. In order to comply with the mandatory Traffic Performance Standards, the Property Owner shall be restricted to the following phasing schedule:

a. No Building Permits for the site may be issued after December 31, 2023, or as amended. A time extension for this condition may be approved by the County Engineer based upon an approved Traffic Study which complies with Mandatory Traffic Performance Standards in place at the time of the request. This extension request shall be made pursuant to the requirements of Art. 2.E of the Unified Land Development Code. (DATE: MONITORING - Engineering)

2. The Property Owner shall provide to the Palm Beach County Right of Way Section of Roadway Production Division a warranty deed (or easement document) for road right of way and all associated documents as required by the County Engineer for Northlake Boulevard, 70 feet, measured from centerline of the proposed right of way on an alignment approved by the County Engineer.

All warranty deed(s) and associated documents, including a title policy naming Palm Beach County as an insured, shall be provided and approved prior to the issuance of the first building permit or within ninety (90) days of a request by the County Engineer, whichever shall occur first. Right of way conveyance shall be along the entire frontage and shall be free and clear of all encroachments and encumbrances. Property Owner shall provide Palm Beach County with sufficient documentation acceptable to the Right of Way Section to ensure that the property is free of all encumbrances and encroachments, including a topographic survey. The Property Owner must further warrant that the property being conveyed to Palm Beach County meets all appropriate and applicable environmental agency requirements. In the event of a determination of contamination which requires remediation or clean up on the property now owned by the Property Owner, the Property Owner agrees to hold the County harmless and shall be responsible for all costs of such clean up, including but not limited to, all applicable permit fees, engineering or other expert witness fees including attorney s fees as well as the actual cost of the clean up. Thoroughfare Plan Road right of way conveyances shall be consistent with Palm Beach County's Thoroughfare Right of Way Identification Map and shall include, where appropriate as determined by the County Engineer, additional right of way for Expanded Intersections and Corner Clips. The Property Owner shall not record these required deeds or related documents. The Property Owner shall provide to the Right of Way Section a tax pro-ration. A check, made payable to the Tax Collector s Office, shall be submitted by the Property Owner for the pro-rated taxes. After final acceptance, Palm Beach County shall record all appropriate deeds and documents. (BLDGPM: MONITORING - Engineering)

3. The Property Owner shall provide an acceptable drainage study identifying any historical drainage from offsite parcels, including proposed grading cross sections. The project s stormwater management system shall be designed to address any historical drainage. The Property Owner shall provide drainage easements, as required, to accommodate offsite drainage.

a. Drainage study shall be provided the Land Development Division prior to final approval of the Site Plan by the DRO. (DRO: ENGINEERING - Engineering)

b. Any required drainage easements shall be recorded prior to issuance of the first building permit. (BLDGPM: MONITORING - Engineering)

ENVIRONMENTAL

1. A complete Standard Vegetation Permit Application For Protection of Native Vegetation Approval, including the appropriate fee, shall be submitted to the Department of Environmental Resources

Management (ERM) prior to the final approval of the plan by the Development Review Officer (DRO). (DRO: ENVIRONMENTAL RESOURCES MANAGEMENT - Environmental Resources Management)

PLANNING

1. Prior to final site plan certification by the Development Review Officer (DRO), the property owner shall provide a Rural Parkway Landscape Plan which recreates the native habitat appropriate for the site, subject to approval by the Planning Division, to include 100% native species. (DRO: PLANNING - Planning)

2. Prior to final site plan certification by the Development Review Officer (DRO), the property owner shall submit a Rural Parkway Management Plan (RPMP) maintenance agreement for perpetual maintenance of the Rural Parkway, subject to approval by Planning. (DRO: PLANNING - Planning)

3. Prior to issuance of the Building Permit, the property owner shall submit a recorded Rural Parkway Easement. The Easement shall include but is not limited to all requirements outlined in the conditions of approval, Comprehensive Plan and Unified Land Development Code. (BLDGPM: MONITORING - Planning)

4. The conservation easement for the Rural Parkway Preserve Area shall include but not be limited to the following items:

a. An approved Rural Parkway Landscape Plan shall include:

- i. Native Vegetation appropriate for the area;
- ii. Existing or native vegetation that is identified to be preserved in situ;
- iii. 100% native vegetation;
- iv. Native vegetation that is relocated or is part of an approved mitigation plan;
- v. co-location of required landscape buffer;
- vi. A paved 6 8-foot wide multipurpose pathway;

b. The Rural Parkway easement shall not include:

- i. Walls;
- ii. Signs;
- iii. No structures shall be allowed in the Rural Parkway Easement with the exception of a bus shelter, and benches/pedestrian gathering area;

c. The Rural Parkway easement may include:

- i. A ten (10) foot utility easement located adjacent to the right-of-way and a bus stop easement;
- ii. Other drainage/utility easements may only be permitted which transverse (run perpendicular to) the Rural Parkway Easement to place drainage/utilities in the developable portion of the approved site plan;
- iii. Other drainage easements may be permitted in the Rural Parkway Easement solely for the purposes of draining the Rural Parkway subject to approval by the County Engineering Department and the Planning Division;
- iv. Overlap of the Rural Parkway and Embankment Easement as long as the purposes of both easements are consistent. (ONGOING: PLANNING - Planning)

5. Prior to issuance of the Building Permit, the property owner shall submit title insurance for the Rural Parkway easement to Palm Beach County subject to approval by the County Attorney and in an amount acceptable to the Planning Division. (BLDGPM: MONITORING - Planning)

6. Within 30 calendar days of issuance of the first Building Permit (BP), the property owner shall commence construction of the Rural Parkway, consistent with the approved Landscape Plan, the ERM Vegetation Permit and in accordance with the Rural Parkway Management Plan. (BLDGPM: MONITORING - Planning)

7. Prior to the release of the first Certificate of Occupancy (CO), the property Owner shall submit an As-Built of the Rural Parkway and ERM Conservation Mitigation Area. The Rural Parkway shall be complete and in compliance with the Rural Parkway Landscape Plan and Management Plan, subject

to a final inspection by a Landscape inspector and/or designated Planning Division staff. (CO: MONITORING - Planning)

COMPLIANCE

1. In Granting this Approval, the Board of County Commissioners relied upon the oral and written representations of the Property Owner/Applicant both on the record and as part of the application process. Deviations from or violation of these representations shall cause the Approval to be presented to the Board of County Commissioners for review under the Compliance Condition of this Approval. (ONGOING: MONITORING - Zoning)

2. Failure to comply with any of the Conditions of Approval for the subject property at any time may result in:

- a. The Issuance of a Stop Work Order; the Issuance of a Cease and Desist Order; the Denial or Revocation of a Building Permit; the Denial or Revocation of a Certificate of Occupancy; the Denial of any other Permit, License or Approval to any developer, owner, lessee, or user of the subject property; the Revocation of any other permit, license or approval from any developer, owner, lessee, or user of the subject property; the Revocation of any concurrency; and/or
- b. The Revocation of the Official Map Amendment, Conditional Use, Requested Use, Development Order Amendment, and/or any other zoning approval; and/or
- c. A requirement of the development to conform with the standards of the Unified Land Development Code at the time of the finding of non-compliance, or the addition or modification of conditions reasonably related to the failure to comply with existing Conditions of Approval; and/or
- d. Referral to Code Enforcement; and/or
- e. Imposition of entitlement density or intensity.

Staff may be directed by the Executive Director of PZ&B or the Code Enforcement Special Master to schedule a Status Report before the body which approved the Official Zoning Map Amendment, Conditional Use, Requested Use, Development Order Amendment, and/or other zoning approval, in accordance with the provisions of Section 2.E of the ULDC, in response to any flagrant violation and/or continued violation of any Condition of Approval. (ONGOING: MONITORING - Zoning)

DISCLOSURE

1. All applicable state or federal permits shall be obtained before commencement of the development authorized by this Development Permit.

Figure 1 - Land Use Map

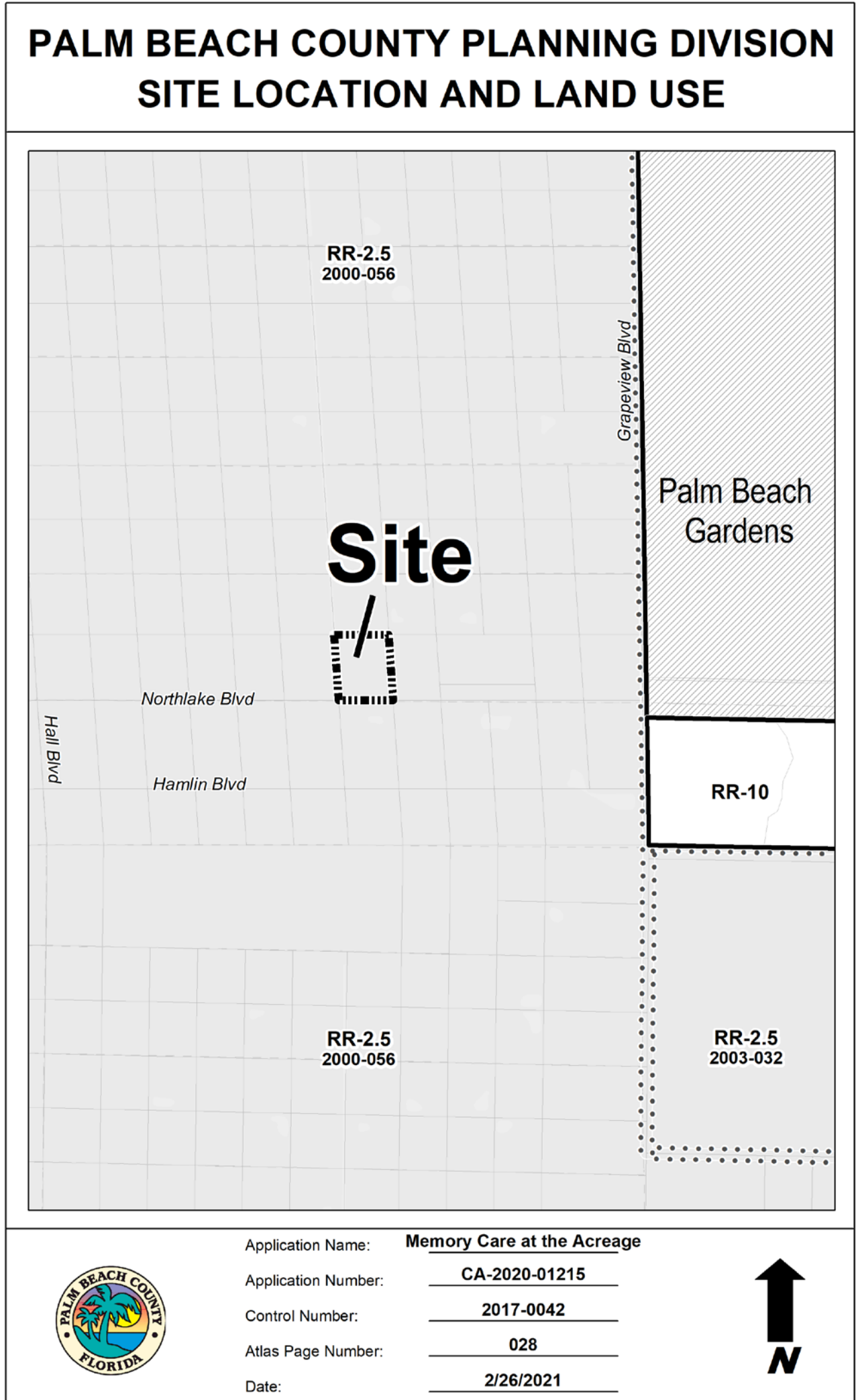


Figure 2 - Zoning Map

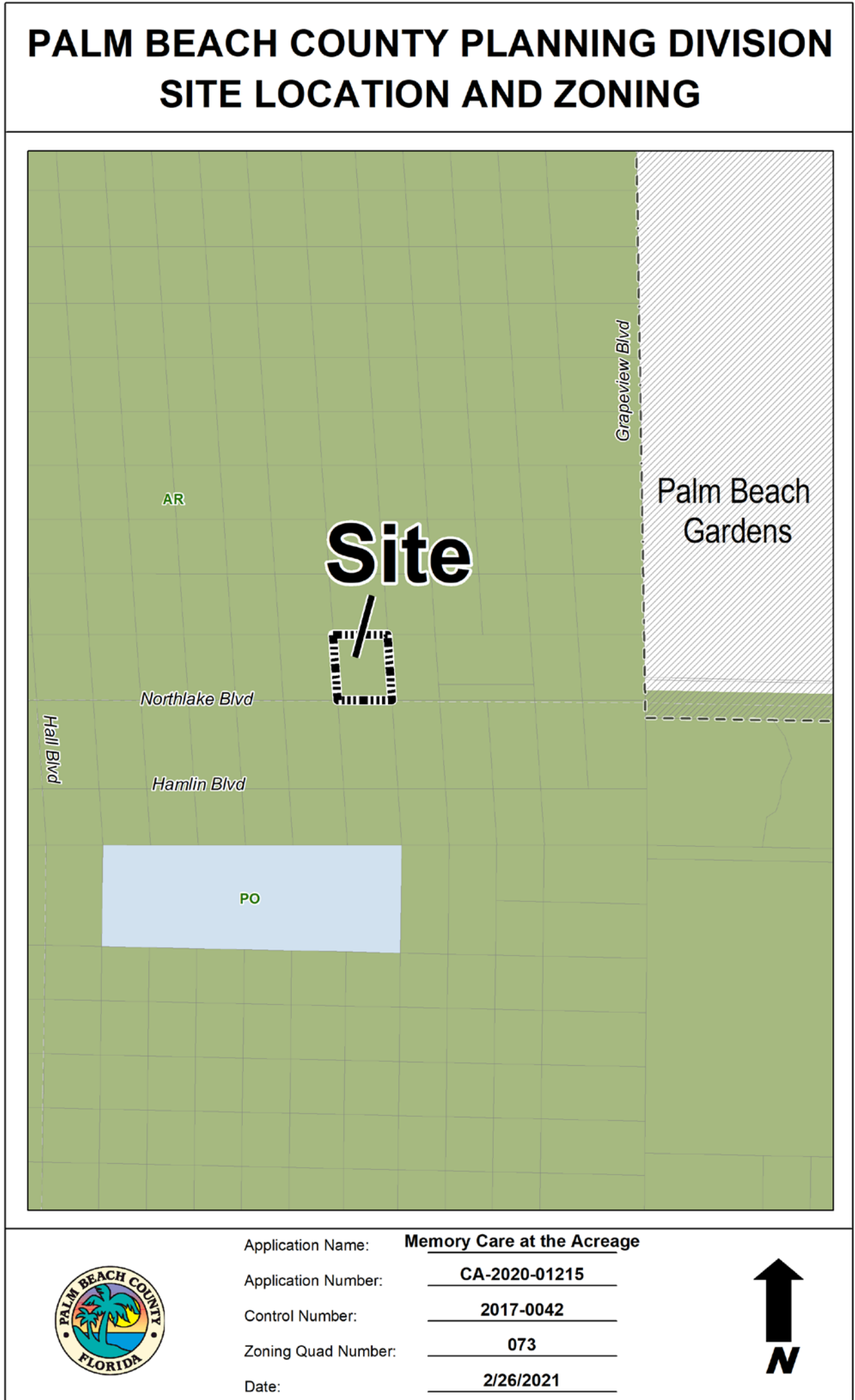


Figure 3 - Aerial

PALM BEACH COUNTY PLANNING DIVISION SITE LOCATION



Application Name:	Memory Care at the Acreage
Application Number:	CA-2020-01215
Control Number:	2017-0042
Atlas Page Number:	028
Date:	2/26/2021



Figure 4 – Preliminary Site Plan (PSP) dated February 22, 2021

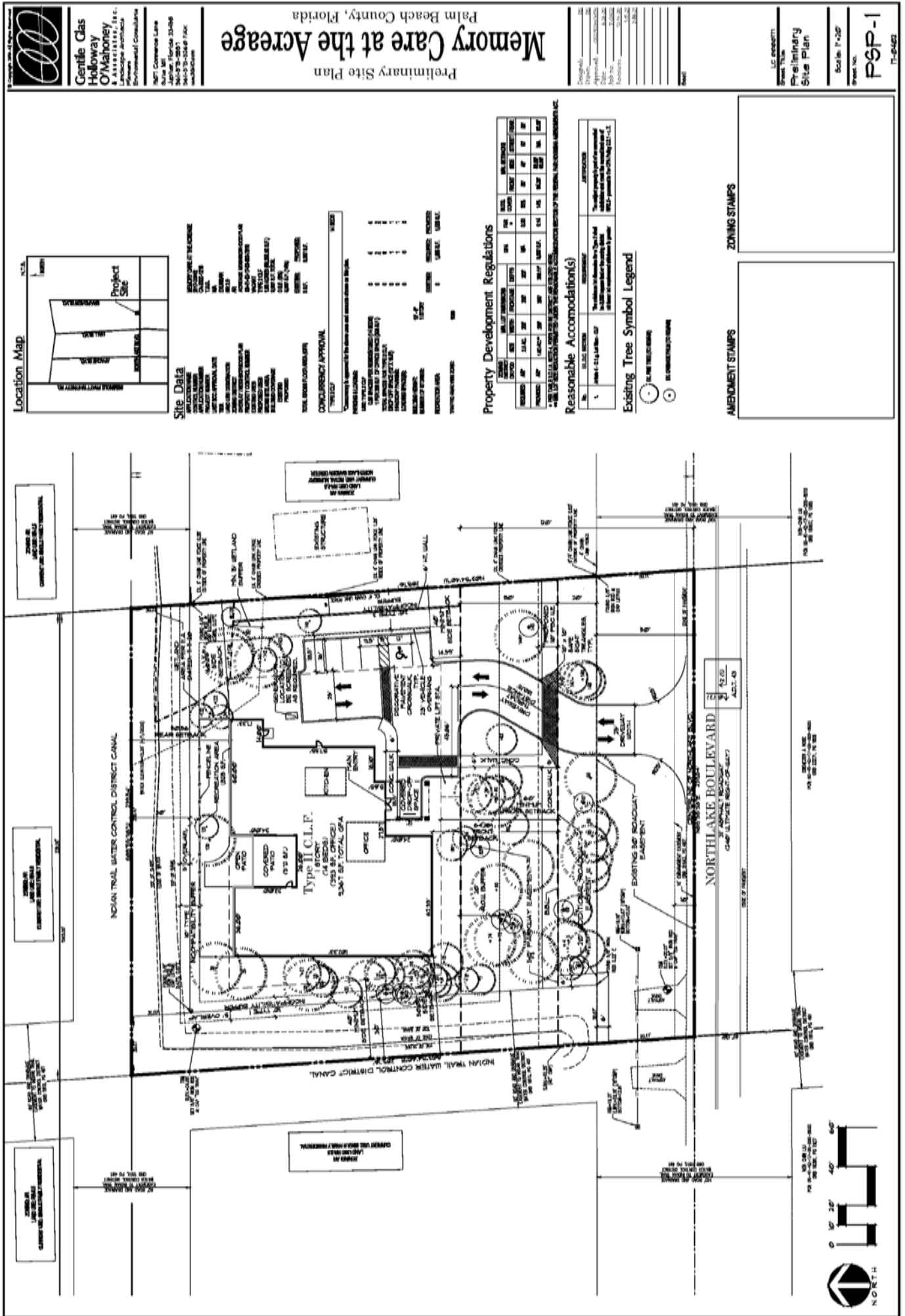


Figure 5 – Preliminary Regulating Plan (PRP) Page 1 of 2 dated February 22, 2021

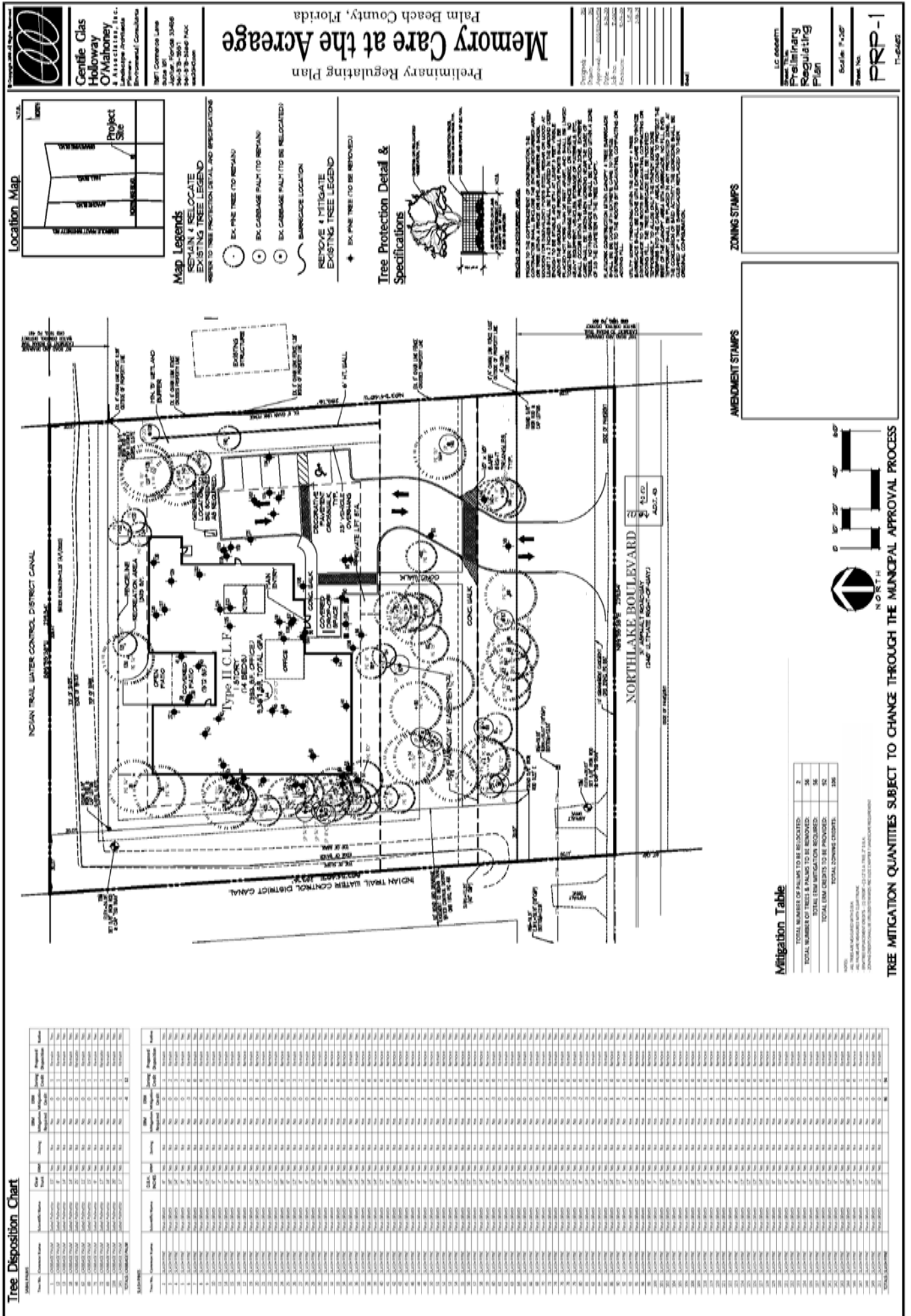


Figure 6 – Preliminary Regulating Plan (PRP) Page 2 of 2 dated February 22, 2021

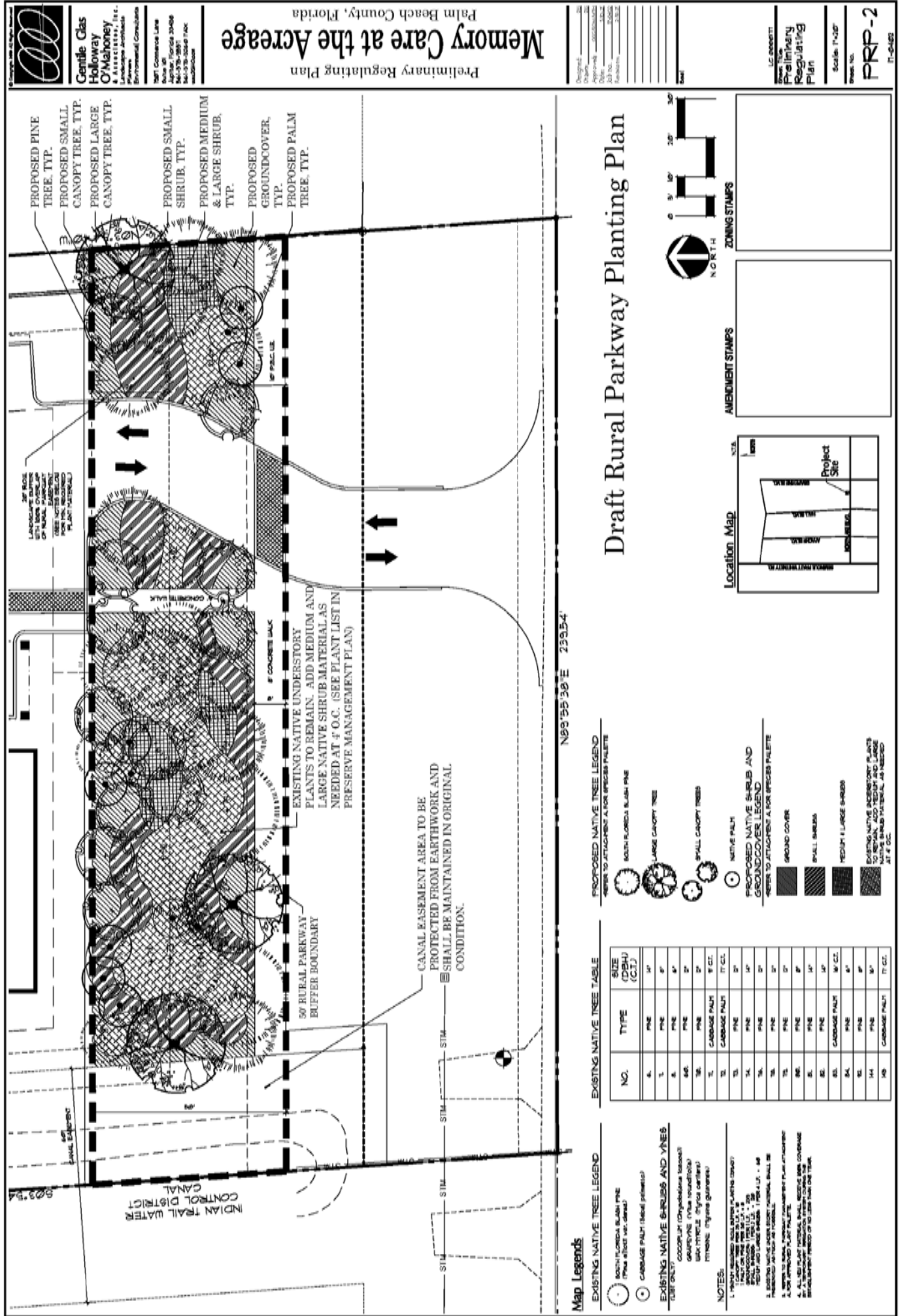


Figure 7 – Reasonable Accommodation Letter dated November 24, 2020



November 24, 2020

Department of Planning,
Zoning & Building

2300 North Jog Road
West Palm Beach, FL 33411-2741
(561) 233-5000

Planning Division 233-5300
Zoning Division 233-5200
Building Division 233-5100
Code Enforcement 233-5500
Contractors Certification 233-5525
Administration Office 233-5005
Executive Office 233-5228
www.pbcgov.com/pzb

Daniel S. Siemsen, Pat Lentini, and Alec Dickerson
2GHO
1907 Commerce Lane Suite 101
Jupiter, FL 33458

**RE: Reasonable Accommodation (RA) RA 2020-1530
Memory Care at the Acreage
Property Control # 00-41-42-17-00-000-7910**

Dear Applicants:

The Zoning Division received your application for Reasonable Accommodation (RA) 2020-530, dated August 26, 2020. (**Attachment 1**).

Background Information:

The subject property is currently undeveloped and the property control number for the parcel is 00-41-42-17-00-000-7910.

Procedure for Review of a Reasonable Accommodation Request:

Article 2.C.8.C of the ULDC, Reasonable Accommodation, provides a process for persons with disabilities covered by the American Disabilities Act (ADA) or the Fair Housing Amendments Act (FHA) to request a reasonable accommodation from the County's ULDC and related rules, policies, practices and procedures.

Persons with Disabilities:

The ADA and the FHA Acts cover individuals with mental or physical impairments, which substantially limit one or more major life activities. The term mental or physical impairment may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activity may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working.

Your RA application states... "The owner is proposing to develop the existing 1.58 acre property with a 14 bed Type 2 CLF to provide a Memory Care Facility. Further, the owner requests a Reasonable Accommodation be granted to depart from the lot size requirement within the AR zoning requirement. The AR zoning district allows this use as a Conditional Use "A", and adequate justification around the applicable conditional use standards has been provided. Memory Care is a service that has become increasingly valuable, and the Owner wants to provide a peaceful serene environment where the users will be able to receive the proper rehabilitation for particular conditions associated with Alzheimer's and Dementia. The proposed location is compatible with surrounding properties, and will not present any adverse impact to the existing community".

■

Palm Beach County
Board of County
Commissioners

Cave Kerner, Mayor
Robert S. Weinroth, Vice Mayor

Maria G. Marino
Cregg K. Weiss
Maria Sachs
Melissa McKinlay
Mack Bernard

County Administrator
Verdenia C. Baker

*"An Equal Opportunity
Affirmative Action Employer"*

Official Electronic Letterhead

The application further states that the facility will provide services to individuals that have one or more of the following disabilities; visual, speech and hearing impairments, dementia, cerebral palsy, heart disease, diabetes, and mental retardation. Based on the representations in the request, the persons who would be residing in this facility meet the requirement of disability under the ADA and the FHA Acts and are eligible to seek Reasonable Accommodation.

In determining whether an accommodation is 'reasonable,' the local government must conduct a case-by-case inquiry. The Department of Justice Civil Rights Division (DOJ) has identified a few salient questions that can be used to guide the analysis. **JOINT STATEMENT OF THE DEPARTMENT OF JUSTICE (DOJ) AND THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) *Group Homes, Local Land Use, and the Fair Housing Act.***
<https://www.justice.gov/crt/fair-housing-act-2>

First, does the request impose an undue burden or expense on the local government? Second, does the proposed use create a fundamental alteration in the zoning scheme? If the answer to either question is "yes," the requested accommodation is unreasonable.

In determining whether the request "create[s] a fundamental alteration in the zoning scheme," the DOJ suggests that local government consider whether the proposed use "will have [any] more impact on parking, traffic, noise, utility use, and other typical concerns of zoning than an 'ordinary family.' If not, the DOJ opines that the accommodation is probably reasonable. The DOJ specifies that the scope and magnitude of the requested accommodation as well as relevant features of the surrounding neighborhood are factors to be considered in the case-by-case analysis.

The Factors Identified by DOJ apply as follows to this Application: Scope and Magnitude of the Requested Accommodation:

The applicant seeks a RA to allow a reduction of minimum lot size as follows:

The Unified Land Development Code (ULDC) Requirement	Proposal	Accommodation
Minimum Lot Size 2.5 Acres	1.58 Acres	-0.92 Acres

Relevant Features of the Subject Neighborhood:
 A neighborhood as defined by the Comprehensive Plan is a compact geographic area consisting of residences which may include uses to serve the daily needs of the residents, such as shops, workplaces,

recreational areas and civic uses (schools, places of worship), that are accessible by interconnecting streets.

The vacant property is located in the Agricultural Residential (AR) Zoning District and has a Rural Residential (RR-2.5) Future Land Use Designation. The proposed use of the property will be a Type 2 Congregate Living Facility (CLF). The surrounding area consists of similarly sized non-conforming parcels that are undeveloped or support single-family residences.

Findings by Staff:

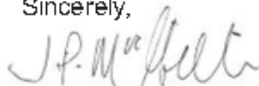
Based on review of the application and the intent of both the ADA and FHA Acts and the County ULDC regulations, with respect to the lot size, staff has determined the accommodation request is reasonable and is therefore granted. Staff relied on the following information in making our final decision:

- Reasonable Accommodation Application dated July 30, 2020; and,
- Staff's research of the facts.

As you are aware your application for Class A Conditional Use CA 2020-1215 for a Type 2 CLF is currently under review by the Public Hearing Section and pending certification for public hearings.

If you have any questions, please contact me at 561-233-5234, or Barbara Pinkston, Principal Site Planner at 561-233-5232.

Sincerely,



Jon MacGillis, ASLA Zoning Director

JM/BP/jj

Attachments: Reasonable Accommodations Application dated 08/26/2020

c: **Hard Copy :** Daniel Siemsen, PLA
Pat Lentini,
Alec Dickerson
Zoning Director File RA 2020-1530 File

Email: Commissioner Melissa McKinlay, District 6
Patrick Rutter, Assistant County Administrator
Ramsay J. Bulkeley, Esq., Executive Director, PZ&B
Bob Banks, Chief Land Use County Attorney
Scott A. Stone, Assistant County Attorney
Jon MacGillis, ASLA, Zoning Director
Barbara Pinkston, Principal Site Planner
William Cross, AICP, Principal Site Planner
Travis Goodson, Site Planner 2



Palm Beach County Zoning Division
2300 N. Jog Road
West Palm Beach, Florida 33411
Phone: (561) 233-5200
Fax: (561) 233-5165

GENERAL APPLICATION
PUBLIC HEARING AND DRO ADMINISTRATIVE PROCESSES

1. REQUEST(S)

Check Type(s) of Application Request(s) and complete as applicable:

PUBLIC HEARING REQUESTS:

- Official Zoning Map Amendment from ... Zoning District to ... Zoning District
With a Concurrent Land Use Amendment from ... Land Use to ... Land Use
Class A Conditional Use (CA) for Type 2 CLF - Maximum of 14 beds
Class B Conditional Use (CB) for:
Development Order Abandonment (ABN) of Resolution No: ... which allowed
Expedited Application Consideration (EAC) for:
Development Order Amendment (DOA) to a previously approved:
COZ PDD/TDD Class A Class B Other:
To modify and/or delete Conditions of Approval; To add and/or delete land area;
To reconfigure Plan(s) Master Site Subdivision To add and/or delete units;
Landscape Regulating Sign Plan To add, delete, or modify Uses;
To add and/or delete square footage; To add access points;
Other:
Type 2 Variance: (Submit Form #43 Variance Supplementa.) Concurrent Standalone
Subdivision Variance: (Submit Form #43 Variance Supplementa.) Concurrent Standalone
PO Deviations: (Submit Form #92 PO Deviation) from Article(s)
Pre-Application Conference (PAC) IRO or PRA: With Questions? Yes No
Type 2 Waiver: (Submit Form #19 Waiver Supplementa.) Concurrent Standalone
Unique Structure:
Other: Reasonable Accommodation for Article 4.C.1.g. - Lot Size - CLF

DRO ADMINISTRATIVE REQUESTS:

- Expedited Development Review Officer approval (DROE) (within 2 months of BCC/ZC approval.)
Use subject to Development Review Officer (DRO) approval for
Pre-Application Conference (PAC) - Concurrent Review: With Questions? Yes No
Type 2 Concurrent Review: with Building Permit# or with Plat, Name/No.
Type 3 Concurrent Review (Zoning, Land Development and Building)
Administrative Modification to a Plan approved by the ZC / BCC / DRO for
Administrative Abandonment (ABN) of a DRO Approval
Subdivision
Transfer of Development Rights (TDR) (Submit Form #16 TDR Supplementa.)
Type 1 Waiver (Submit Form #19 Waiver Supplementa.) from Article for
Other

2. APPLICANT INFORMATION

Current Property Owner(s) Name: Moore Florida Property Investment, LLC
 Address: 1291 W. 32nd Street City: Rivers Beach
 State: FL Zip: 33404
 Phone: 561-840-1627 Cell Phone: _____
 Email Address: kimboe@moorecareassistedliving.com

Applicant's name (if other than property owner(s)): _____
 Address: _____ City: _____
 State: _____ Zip: _____
 Phone: _____ Cell Phone: _____
 Email Address: _____

Check (✓) here if Applicant is a contract purchaser. Consent is required from the contract purchaser if a contract is pending to purchase the subject property. Home Owners Association (HOA) or Property Owners Association (POA) consent will be required if subject property is under common ownership or request is to modify any aspect of the project which applies to the entire development (i.e. condition of approval, internal roadway, etc.)

Agent: Carrel S. Siemsen, PLA Name of Firm: 2GHO
 Address: 1907 Commerce Lane, Suite 101 City: Jupiter State: FL Zip: 33458
 Phone: 561-575-9557 Cell Phone #: 861-248-9396
 Email Address: _____

Agent: Alec Dickerson Name of Firm: 2GHO
 Address: 1907 Commerce Lane, Suite 101 City: Jupiter State: FL Zip: 33458
 Phone: 561-575-9557 Cell Phone #: 861-307-9041
 Email Address: alec@2gho.com

* All correspondence will be sent to the Agent(s) unless otherwise specified.

3. PROPERTY INFORMATION (* Required Fields)

A. *Property Control Number (PCN): <small>(List additional PCN(s) on separate sheet)</small>	00-41-42-17-00-000-7910
B. *Control Number:	2017-00042
C. *Control Name :	Memory Care At The Acreage
D. Application Number:	CA2020-1215
E. *Application Name:	Memory Care At The Acreage
F. Project Number:	TBD
G. *Gross Acreage:	1.58 acres
H. Gross Acreage of affected area:	1.58 acres
I. *Location of subject property: <small>(proximity to closest major intersection/road)</small>	Northlake Blvd. - Approx. 1,100 feet west of Grapeview Blvd.
J. *Address:	TBD
K. *BCC District:	6
L. Overlay (Special Study Area):	Acreage Neighborhood Plan
M. Tier	<input type="checkbox"/> U/S <input checked="" type="checkbox"/> R/EX <input type="checkbox"/> AGR <input type="checkbox"/> GLADES

4. LAND USE AND ZONING INFORMATION

Current Future Land Use designation:	RR 2.5	Proposed Future Land Use designation:	RR 2.5
Current Zoning District:	AR	Proposed Zoning District:	AR
Existing Use(s):	VACANT	Proposed Use(s):	Type 2 CLF
Existing Square Footage:	VACANT	Proposed Square Footage:	9,367 S.F.
Existing Number of Units:	N/A	Proposed Number of Units:	14 beds

5. ARCHITECTURAL REVIEW

This application is subject to the requirements of Article 5.C, Design Standards and request review of the proposed elevations concurrent with:

- Type 1 Projects Requiring BCC Approval
- Type 2 Projects Requiring ZC Approval
- Type 3 Projects Requiring DRO or Site Plan Approval
- Type 4 Projects Requiring Building Permit Approval

This application also includes request(s) for Elevation review and consideration, as indicated below:

- Revise previously approved Elevations;
- Non-conforming structures that are subject to Article 5.C, Percentage of Renovations;
- Approval for Green Architecture (Type 1 Waiver, Art.5.C.1.E.3)
- Approval for Unique Structure (Art.5.C.1.E.2)

Note: All application documents shall be consistent with the current Technical Manual, refer to the Zoning Web Page.

6. ADJACENT PROPERTIES

Complete the chart below to identify the Use and Zoning information for the surrounding properties to the project.

Adjacent Property	FLU	Zoning District	Existing Use (Res, Comm, Ind, etc.)	Approved Use (Res, Comm, Ind, etc.)	Existing Sq. ft. or DU/AC	Approved Sq. ft. or DU/AC	Control # (FKA Petition #)	Resolution # R _
EAST	RR-2.5	AR	Plant Nursery					
NORTH	RR-2.5	AR	Single Family Residence					
SOUTH	RR-2.5	AR	Northlake Boulevard					
WEST	RR-2.5	AR	Single Family Residence					

7. COMPLIANCE

YES <input type="checkbox"/> NO <input type="checkbox"/>	Is the property in compliance with all previous Conditions of Approval and applicable Code Requirements? <i>if no, please explain in the Justification Statement.</i>
YES <input type="checkbox"/> NO <input type="checkbox"/>	Is the property currently the subject of Code Enforcement Action? <i>if yes, provide Code Enforcement Case Number: _____</i>
YES <input type="checkbox"/> NO <input type="checkbox"/>	Will the request require modification(s) to a recorded plat or plat with Technical Compliance? <i>if yes, explain in the Justification Statement.</i>
YES <input type="checkbox"/> NO <input type="checkbox"/>	Is the subject property an existing legal lot of record? <i>if no, submit Legal Lot Review Application to the Land Development Division.</i>
YES <input type="checkbox"/> NO <input type="checkbox"/>	Does the proposed improvements exceed the allowable improvement value of the existing structure as identified in ULDC, Article 1? <i>if yes, comply with Article 1.F – Nonconformities.</i>

8. PROPOSED USE DETAILS

Building Name	Use(s) (as per ULDC)	Square Footage	Number of Units	Phase Name	Outparcel
single building	Type 2 CLF	9,367 s.f.	14 beds	single phase	N/A

9. CONCURRENCY			
Concurrency Reservation <input checked="" type="checkbox"/>		Concurrency Equivalency <input type="checkbox"/>	
		Concurrency Exemption <input type="checkbox"/>	
A. Water Provider:	N/A		
B. Waste Water Provider:	N/A		
C. Drainage District:	INDIAN TRAIL IMPROVEMENT DISTRICT		
D. Traffic Provider:		Traffic Trips Existing:	0
E. Mass Transit Provider:	NO ROUTES	Traffic Trips Proposed:	43
F. Traffic Capacity:	Number of Gross Peak Hour Trips = 43 <small>(If greater than 30, a traffic study will be required)</small>		
G. Public School:	N/A		
H. Public Health Provider:	PBCWUD	Well /Septic tank : YES	
I. Parks	PALM BEACH COUNTY PARKS		
J. Fire Rescue	PALM BEACH COUNTY - FIRE STATION NO. 26		
K. Solid Waste:	SWA		
L. Check the proposed means of achieving access from the development site to a point of Legal Positive Outfall for storm water discharged from the site: <input type="checkbox"/> Property is contiguous to a natural waterway, or a canal owned and operated by a water control district. <input type="checkbox"/> Property owner has legally established drainage rights to convey storm water through all intervening properties between the development site and natural waterway or water control district canal. <input checked="" type="checkbox"/> Property abuts a road with a functioning drainage system, and property owner has obtained written confirmation from the entity responsible for maintaining the road that the proposed development is eligible to utilize the road drainage system, subject to meeting all permit requirements for drainage connection. <input type="checkbox"/> Other (specify): _____			

10. ENVIRONMENTAL ANALYSIS	
ENVIRONMENTAL RESOURCE MANAGEMENT (ERM) – Art. 14.B.8.C	
Is there Native Vegetation on Site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes; a Pre-Application Appointment with ERM is required; Enter date of PAA meeting with ERM <u>SITE VISIT JULY 10 2020</u> ;
General Vegetation Statement: Site is heavily vegetated and coordination with ERM is required. A site visit took place on July 10, 2020.	
Existing and Proposed Grade/Elevation where existing Native Vegetation is to be preserved:	
Is site in a Wellfield protection zone?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes; submit Wellfield Protection Affidavit, available from ERM
HEALTH DEPARTMENT – Art. 15	
In Justification Statement, under heading "Hazardous Material", address type(s) and amount of: 1) all industrial, manufacturing, special or hazardous waste that may be generated; 2) airborne pollutants that may be generated (i.e. dust or other unconfined particulates such as NOx, SOx, CO, VOC's, heavy metals, etc.); and, 3) any special handling of solid waste that may be required.	

This application is not complete without the following documents as attachments:

1. **Justification Statement:** to address the purpose, project history, intent and design objectives of this request, refer to Art.2.A.6.A.1 for the required information.
2. **Status of Conditions of Approval (COA):**
 - a. Provide letter/document which includes the status of all current Conditions of Approval;
 - b. Include the exact language for any modification(s) to any Condition of Approval;
 - c. If the application request requires time extension for Commencement of Development or recording a Plat, then provide further explanation. (This explanation may be added to the Justification Statement.)

Note: Please refer to PZB Zoning Website for all ULDC Articles <http://www.pbcgov.com/uldc/index.htm> referenced in this document and the Technical Manual for helpful information <http://www.pbcgov.com/techmanual/index.htm>

Exhibit D – Disclosure of Ownership

DISCLOSURE OF OWNERSHIP INTERESTS – PROPERTY

[TO BE COMPLETED AND EXECUTED BY THE PROPERTY OWNER(S) FOR EACH APPLICATION FOR COMPREHENSIVE PLAN AMENDMENT OR DEVELOPMENT ORDER]

TO: PALM BEACH COUNTY PLANNING, ZONING AND BUILDING EXECUTIVE DIRECTOR, OR HIS OR HER OFFICIALLY DESIGNATED REPRESENTATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

BEFORE ME, the undersigned authority, this day personally appeared Keisha Douglas-Moore, hereinafter referred to as "Affiant," who being by me first duly sworn, under oath, deposes and states as follows:

- 1. Affiant is the [] individual or [x] Manager of Moore Florida Property Investments, LLC [position - e.g., president, partner, trustee] of Moore Florida Property Investments, LLC [name and type of entity - e.g., ABC Corporation, XYZ Limited Partnership] that holds an ownership interest in real property legally described on the attached Exhibit "A" (the "Property"). The Property is the subject of an application for Comprehensive Plan amendment or Development Order approval with Palm Beach County.
2. Affiant's address is: 1291 W. 32nd Street, Riviera Beach FL 33404
3. Attached hereto as Exhibit "B" is a complete listing of the names and addresses of every person or entity having a five percent or greater interest in the Property. Disclosure does not apply to an individual's or entity's interest in any entity registered with the Federal Securities Exchange Commission or registered pursuant to Chapter 517, Florida Statutes, whose interest is for sale to the general public.
4. Affiant acknowledges that this Affidavit is given to comply with Palm Beach County policy, and will be relied upon by Palm Beach County in its review of application for Comprehensive Plan amendment or Development Order approval affecting the Property. Affiant further acknowledges that he or she is authorized to execute this Disclosure of Ownership Interests on behalf of any and all individuals or entities holding a five percent or greater interest in the Property.
5. Affiant further acknowledges that he or she shall by affidavit amend this disclosure to reflect any changes to ownership interests in the Property that may occur before the date of final public hearing on the application for Comprehensive Plan amendment or Development Order approval.
6. Affiant further states that Affiant is familiar with the nature of an oath and with the penalties provided by the laws of the State of Florida for falsely swearing to statements under oath.

7. Under penalty of perjury, Affiant declares that Affiant has examined this Affidavit and to the best of Affiant's knowledge and belief, it is true, correct, and complete.

FURTHER AFFIANT SAYETH NAUGHT.

Keisha Douglas-Moore
Keisha Douglas-Moore, Affiant
(Print Affiant Name)

NOTARY PUBLIC INFORMATION:

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me by means of [] physical presence or [] online notarization, this 28th day of July, 2020 by Keisha Douglas-Moore (name of person acknowledging). He (she) is personally known to me or has produced FL Drivers License (type of identification) as identification and did did not take an oath (circle correct response).

Joshua Bell
(Name - type, stamp or print clearly)

Joshua Bell
(Signature)

My Commission Expires on: 9/17/23

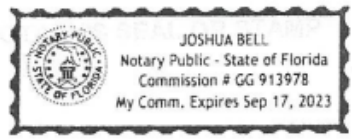


EXHIBIT "A"

PROPERTY

TRACT AB-116 UNRECORDED SUBDIVISION ROYAL PALM BEACH
THE NORTH 289.11 FEET OF THE SOUTH 928.36 FEET OF THE EAST 239 FEET OF THE WEST
1563 FEET OF THE WEST ONE-HALF 1/2 OF SECTION 17, TOWNSHIP 42 SOUTH, RANGE 41
EAST, PALM BEACH COUNTY, FLORIDA.

PARCEL IDENTIFICATION NUMBER: 00-41-42-17-00-000-7910

EXHIBIT "B"

DISCLOSURE OF OWNERSHIP INTERESTS - PROPERTY

Affiant must identify all entities and individuals owning five percent or more ownership interest in the Property. Affiant must identify individual owners. For example, if Affiant is an officer of a corporation or partnership that is wholly or partially owned by another entity, such as a corporation, Affiant must identify the other entity, its address, and the individual owners of the other entity. Disclosure does not apply to an individual's or entity's interest in any entity registered with the Federal Securities Exchange Commission or registered pursuant to Chapter 517, Florida Statutes, whose interest is for sale to the general public.

Name	Address
Keisha Douglas-Moore	1291 W. 32nd Street Riviera Beach, FL 33404