



COMPREHENSIVE PLAN AMENDMENT STAFF REPORT AMENDMENT ROUND 26-A

BCC TRANSMITTAL PUBLIC HEARING, NOVEMBER 5, 2025

I. General Data

Project Name:	Westgate/Belvedere Homes CRA (WCRA) Bonus Density
Element:	Future Land Use Element (FLUE)
Project Manager:	Denise Pennell, Director of Planning & Development Westgate CRA David Wiloch, Senior Planner, PBC Planning Division
Staff Recommendation:	Staff recommends approval based on the findings and conclusions presented in this report.

II. Item Summary

Summary:	This County proposed text amendment is requested by the WCRA to increase the number of units available in the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO) Density Bonus Pool. The pool units are used to increase residential density in the WCRAO, reducing the need for Future Land Use amendments and thereby expediting redevelopment. The current allotment of 1,300 units does not reflect the current development outlook, which now considers transit-oriented, mixed-use development density clusters along Okeechobee Boulevard, and within transitional areas between Okeechobee Boulevard and Westgate Avenue, as well additional housing south of Westgate Avenue. These clusters would include the potential redevelopment of several large sites, including the 47-acre Palm Beach Kennel Club, which is currently contemplating a project with 1,200 residential units. The proposed amendment would increase the number of bonus units available in the WCRAO Density Bonus Pool for a total of 4,300, to support these projects and Agency's next 20-year planning horizon and assist in addressing the ongoing need for housing production countywide.
Assessment:	The development and redevelopment scenario proposed by the Westgate/Belvedere Community Redevelopment Agency (CRA) is in support of County goals, the CRA Redevelopment Plan goals, and the regional and state efforts to encourage redevelopment. The proposed additional density bonus pool units allow higher land use intensity and density <u>and serves an incentive to encourage redevelopment and a stronger output of housing within the WCRAO without a need for a future land use amendment.</u> units than allowed by the existing future land use. <u>Future development projects using the density bonus will still be required to be in compliance with the ULDC, including concurrency and Workforce Housing and approval of the projects will be considered through the quasi-judicial process (Zoning) instead of legislative process (Comprehensive Plan).</u> The required additional units will help provide housing for the County's population.

III. Hearing History

Local Planning Agency: A motion to approve, made by Glenn Gromann, seconded by Barbara Roth, passed in a 12 to 0 vote at the January 10, 2025 public hearing. Commission discussion included comments regarding impact to infrastructure (traffic and drainage), allocation of units for the bonus density throughout the WCRAO and questions about CRA funding and workforce housing requirements. One member of the public, representing Frisbie Group, spoke in support of the amendment, highlighting the benefits of redevelopment.

Changes subsequent to the Planning Commission (PLC): Changes are reflected in added text in underline and deleted text shown as ~~striketrough~~. The Westgate CRA provided an updated justification statement (Exhibit 2B) to replace the previous statement (previously Exhibit 2 and now Exhibit 2A), new traffic analysis impact (Exhibit 4B) as well as a new document titled “*Westgate CRA Mobility Plan Framework and Strategies*” as Exhibit 7 to provide mitigation strategies for the traffic impacts. The County’s Traffic Division provided a review of the traffic analysis impact as Exhibit 4C. In addition, the statutorily required Business Impact Estimate is added as Exhibit 6.

Board of County Commissioners Transmittal Public Hearing:

State Review Agencies:

Board of County Commissioners Adoption Public Hearing:

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IV. Intent of the Amendment

The intent of this amendment is to change Future Land Use Element Policy 1.2.3-b to increase the number of bonus units in the Density Bonus Pool by 3,000 units from the current allotment of 1,300 units, for a total of 4,300 units. This increase would support the Agency's next 20-year planning horizon, and the ongoing need for housing countywide.

V. Background

The WCRAO is bounded on the north by Okeechobee Boulevard, on the south by Belvedere Road, on the east by Florida Mango Road and on the west by Military Trail. The area is approximately 1,300 acres (2.03 square miles) in size. In 1988, WCRAO was established in the Comprehensive Plan to encourage development and redevelopment with special land use provisions designed to arrest deterioration of property values, and preserve affordable housing. The CRA was created the following year, in 1989, by the Board of County Commissioners (BCC) pursuant to the Community Redevelopment Act, F.S. Chapter 163, Part III, as a dependent special district for the redevelopment of the area.

The CRA established their initial Community Redevelopment Plan in 1989, which was adopted by the BCC on May 9, 1989 (by Ordinance No. 89-6). This Redevelopment Plan provided for desired future land uses, receiving areas for greater commercial intensities, an infrastructure improvement schedule, an updated economic forecast and residential bonus provisions. The residential bonus provisions were in the form of a Density Bonus Pool for the CRA area, with 300 units initially allocated to the pool through FLUE Policy 1.2.4-b. which was later changed to 1.2.3-b. Density Bonus Pool unit requests are vetted by the CRA through Policy language that states "a proposed residential project must be recommended for approval by the CRA to be eligible to receive bonus units from the density pool. The pool units may be increased through amendments to the Comprehensive Plan text." In 2003, the CRA hired the planning firm Civic Design Associates to prepare a Redevelopment Plan update that amended the original 1989 Redevelopment Plan. The update identified a need for additional housing among other needs. The original allotment of 300 units to the Density Bonus Pool was then amended by the Board of County Commissioners in 2005 (Round 05-1) to the current allotment of 1,300 units. The pool currently holds approximately 930 remaining bonus units with new residential and mixed use developments in the early entitlement process.

VI. Data and Analysis

This section provides background information regarding the proposed amendment, and consistency of the proposed changes with the Comprehensive Plan.

- A. Proposed Text Amendment.** Currently 930 Bonus units remain in the Density Bonus Pool. This amendment request is triggered by the proposed redevelopment of a 47-acre site within the CRA district with a CH/5 FLU, which was not previously contemplated in the 2005 assignment of 1,300 bonus units. This development proposes to utilize approximately 50% of the remaining bonus units in its first phase, with more residential units anticipated in subsequent phasing. The BCC has the authority within the WCRAO to approve residential densities higher than those shown in the Future Land Use Atlas. These additional units must be obtained from a density pool of bonus units assigned to the WCRAO.

Complete data and analysis to support the proposed change are provided in Exhibit 2B. The data and analysis for the proposed amendment are based on the justification that an increase in bonus density pool units is necessary in order to implement the development and redevelopment activities consistent with the CRA's Community Redevelopment Plan and the County's Comprehensive Plan.

To address traffic concerns following the Planning Commission Hearing, the CRA has included mobility strategies in their support documents (Exhibit 2B) to mitigate the traffic impact for the additional density pool units. Traffic management strategies for addressing increased density within the Westgate CRA focus on enhancing transportation options and reducing the reliance on automobiles, which is in line with the goals outlined in the CRA Plan for transportation and roadway improvements. Ongoing partnerships and coordination with Westgate businesses and the residential community, the Palm Beach Transportation Planning Agency (TPA), Palm Tran, Palm Beach International Airport, the County's Traffic Division, the City of West Palm Beach, and private developers will ultimately guide the implementation of strategies to improve mobility within the area. Further clarification of the mitigation strategies and work plan timing from the WCRA can be anticipated between the Transmittal and Adoption Hearing. In addition, the CRA submitted a traffic impact analysis (Executive Summary is attached as Exhibit 4B) to address impacts from the 3,000 units for review by the Engineering and Public Works Department. The report has been reviewed by the Traffic Division (Exhibit 4C), which concluded that some of the roadway segments in the area will fail due to the background traffic and the additional 3,000 units will not cause any new failures

- B. Supporting Information.** The WCRAO was created to encourage the development and redevelopment of the Westgate area. The special land use provisions for the Overlay are designed to arrest deterioration of property values, and preserve affordable housing and complement the efforts to implement a Community Redevelopment Plan. The 2005 Plan outlined desired locations for future land uses as well as the designation of receiving areas for the commercial and residential bonus provisions of the Overlay. The Redevelopment Plan may be amended from time to time using the procedures for adoption as included in Chapter 163, Part III, F.S. The Redevelopment Plan was amended in 2017 to refocus work efforts toward vertical redevelopment and economic development. The residential bonus provisions in Sub-objective 1.2.3 are designed to reduce the need for Future Land Use Atlas amendments, thereby expediting development entitlements. The CRA is proposing to maintain the existing future land use densities and intensities but with changes to accommodate additional units within the Overlay. The area is impacted by many constraints including a lack of contiguous or larger vacant lots, nonconforming or obsolete structures and lots, lack of adequate density and development incentives to leverage private investments, and the construction of retention projects that have taken available, developable land. In order for the Westgate CRA to accomplish its goal of revitalizing the community, it will need to attract more residents and businesses to the area. Due to the aforementioned issues, the CRA cites a need for an additional 3,000 bonus density units to accomplish its development and redevelopment goals. This action is consistent with the BCC endorsement of the modified Redevelopment Plan.

C. Consistency with the Comprehensive Plan

Several provisions in the Future Land Use Element (FLUE) of the Comprehensive Plan are applicable to this amendment, and are listed below:

1. **SUB-OBJECTIVE 1.2.3 Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO)**

The Westgate/Belvedere Homes Community Redevelopment Area Overlay was created to encourage development and redevelopment of the Westgate area. The special land use provisions for the Overlay are designed to arrest deterioration of property values, and preserve affordable housing and complement the efforts to prepare and implement a community redevelopment plan for the Westgate area. The Westgate/Belvedere Homes Community Redevelopment Plan (hereafter Redevelopment Plan) is intended to geographically represent the desired locations for future land uses as well as the designation of receiving areas for the commercial and residential bonus provisions of the Overlay. The Redevelopment Plan will also consist of a program to rectify the severe infrastructure problems in the area. The County staff shall use the Redevelopment Plan in making recommendations and decisions on land use matters including zoning petitions, land use amendments, bonus criteria, text changes to the Unified Land Development Code and other implementing measures. The Redevelopment Plan may be amended from time to time using the procedures for adoption as included in Chapter 163 F.S. The provisions in Sub-objective 1.2.3 are designed to reduce the need for Future Land Use Atlas amendments to implement a community redevelopment plan for the Westgate/Belvedere Homes Area. This does not preclude the ability of property owners to initiate Future Land Use Atlas amendments in the Study Area. Special Overlay designation does not eliminate the requirement to conform to the Traffic Performance Standard, other concurrency management requirements or any other requirement adopted as part of the County's Comprehensive Plan or Unified Land Development Code.

Staff Analysis: The County and the CRA have a goal of improving the redevelopment area, particularly older, deteriorated housing stock, and to provide new housing for residents of all income levels. In order for the Westgate CRA to accomplish its goal of revitalizing the community, it will need to attract more residents and businesses to the area. Due to the aforementioned issues, such as the proposed redevelopment of the Palm Beach Kennel Club and in anticipation of more development interests in the area upon completion of the complete street roadway improvements along Westgate Avenue, the CRA cites a need for an additional 3,000 bonus density units to accomplish its development and redevelopment goals. This action is consistent with the BCC endorsement of the modified Redevelopment Plan.

2. **Policy 1.2.3-b: Bonus Density Pool -** *The Board of County Commissioners has the authority within the WCRAO to approve residential densities higher than those shown on the Future Land Use Atlas for areas designated residential. These additional units must be obtained from a density pool of 1,300 bonus units assigned to the Westgate/Belvedere Homes Area by this Element. A proposed residential project must be recommended for approval by the Community Redevelopment Agency to be eligible to receive bonus units from the density pool. The pool of units may be increased through amendments to the Comprehensive Plan text.*

Staff Analysis: The amendment complements the County's goals to encourage higher densities through redevelopment and infill in designated areas, and the State's goal to

provide housing for a growing population. The amendment is consistent with FLUE Policy 1.2.3-b which allows “the pool of units to be increased through amendments to the Comprehensive Plan text”.

D. ULDC Implications

This proposed amendment will not result in changes to the Unified Land Development Code.

VII. Public and Municipal Review

Intergovernmental Plan Amendment Review Committee (IPARC): Notification was sent to the County’s Intergovernmental Plan Amendment Review Committee (IPARC), a clearing-house for plan amendments on December 20, 2024. At the time of the printing of this report, no calls or written requests for information or objections to the amendment had been received.

Other Notice: The Westgate CRA held a public meeting on November 19, 2024 to discuss the proposed amendment. Responses to a community survey are provided in Exhibit 3, and overall favored the text amendment. Over 65% of residents, and all property owners, developers and business operators who responded, support the initiative. Correspondence received throughout the process is provided in Exhibit 5.

VIII. Staff Assessment and Conclusion

The development and redevelopment scenario proposed by the Westgate/Belvedere Community Redevelopment Agency (CRA) is in support of County goals, the CRA Redevelopment Plan goals, and the regional and state efforts to encourage redevelopment. The proposed additional density bonus pool units allow higher land use intensity and density resulting in a stronger output of housing units than allowed by the existing future land use. The required additional units will help provide housing for the County’s population. There were no inconsistencies identified with policies in the Comprehensive Plan.

Staff recommends **approval** of this amendment.

Attachments	Page
1. Proposed changes in strike out and underline format	E-1
2A. Justification Statement provided by Westgate CRA	E-2
2B. <u>Updated Justification Statement provided by Westgate CRA (9/10/2025)</u>	<u>E-16</u>
3. Community Survey Summary provided by Westgate CRA	E-36
4A. <u>Traffic Statement provided by Westgate CRA (dated 12/17/24)</u>	E-38
4B. <u>Traffic Impact Analysis provided by Westgate CRA (dated 9/10/25)</u>	<u>E-39</u>
4C. <u>PBC Traffic Division Review of Kimley Horn 9/10/25 Traffic Report (dated 9/23/25)</u>	<u>E-41</u>
5. Correspondence	E-43
6. <u>Business Impact Estimate</u>	<u>E-44</u>
7. <u>Westgate CRA Mobility Plan Framework and Strategies (dated 9/15/25)</u>	<u>E-45</u>

Exhibit 1

Proposed Text Amendment

A. Future Land Use Element, Westgate/Belvedere Homes CRA Bonus Density

REVISIONS: To increase the bonus density pool units for the Westgate/Belvedere Homes Community Redevelopment Area Overlay from 1,300 to 4,300 units. The revisions shown with the added text underlined, and the deleted text ~~struck out~~.

1. **REVISE Policy 1.2.3-b: Bonus Density Pool** - The Board of County Commissioners has the authority within the WCRAO to approve residential densities higher than those shown on the Future Land Use Atlas for areas designated residential. These additional units must be obtained from a density pool of ~~1300~~ 4,300 bonus units assigned to the Westgate/Belvedere Homes Area by this Element. A proposed residential project must be recommended for approval by the Community Redevelopment Agency to be eligible to receive bonus units from the density pool. The pool of units may be increased through amendments to the Comprehensive Plan text.

Exhibit 2A
Justification Statement provided by Westgate CRA
(Replaced by new Exhibit 2B)

A. Request Justification & Analysis

SUMMARY OF REQUEST

This County proposed text amendment is requested by the Westgate/Belvedere Homes Community Redevelopment Agency to revise Future Land Use Element (FLUE) Sub-Objective 1.2.3., Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO), specifically Policy 1.2.3-b, Density Bonus Pool. The request supports ongoing development and redevelopment activities outlined in the Agency's 2005 and 2017 Community Redevelopment Plans. This amendment seeks to increase the number of bonus units available in the pool to support the Agency's 20-year build out development horizon, and the ongoing need for housing production countywide.

The Community Redevelopment Plan proposes smart growth principles and regulatory incentives to orient density toward the Westgate area. This is supported by its central location, transit opportunities, and improved infrastructure capacity. Through a Comprehensive Plan text amendment in 2005, the Board of County Commissioners recognized the Westgate/Belvedere Homes Community Redevelopment Area as a receiving area for commercial and residential bonus provisions beyond what is contemplated by the future land use and established a density pool of 1,300 bonus units assigned to the area. The pool of units was originally 300; the 2005 text amendment represented an increase of 1,000 previously assigned through the Policy. This revision seeks to replenish and increase the number of bonus units available in the Pool through the Policy by 3,000, to a total of 4,300, to facilitate housing production, and the CRA's long range build out projections. The acceleration of planned, entitled and constructed residential development is depleting the pool, which currently holds approximately 930 units.

The amendment request is triggered by the planned redevelopment of the historic 47-acre Palm Beach Kennel Club site within the CRA district which supports a commercial high, with an underlying 5 units per acre future land use (CH/5 FLU). The redevelopment of the site was not previously contemplated in the 2005 assignment of 1,300 bonus units. This landmark redevelopment project proposes 1,200 residential units in a phased program. To realize the residential density needed, the project will be allocated bonus density through the WCRAO Density Bonus Pool for the purpose it was established: to facilitate residential and mixed-use redevelopment within the Westgate area without the need for Future Land Use Atlas amendments. The redevelopment project proposes to utilize approximately 50% of the remaining 930 bonus units in its first phase, with more residential units anticipated in subsequent phasing.

The request facilitates the future residential build out of key areas within the CRA boundaries with potential for redevelopment, supported by the goals of the Redevelopment Plan. These key areas are represented as density clusters within corresponding ULDC WCRAO Sub-areas. The implementation of the Density Bonus Pool is codified in the ULDC WCRAO, with criteria for obtaining bonus density, approvals processes, and Pool limits by Sub-area based on capacity for redevelopment. It is important to note that an allocation within the Policy language of the Comprehensive Plan does not necessarily equate to development on the ground. Multiple, often unforeseen factors, can impact development cycles, and housing market trends. It is possible that the build out scenario remains a projection, and is never fully realized.

The 20-year Density Bonus Program Multifamily Unit Projection models a total build out scenario that balances existing viable multi-family units, planned development, and a projection for new multi-family units over time. The analysis assumes that 8 units per acre is generally the highest density allowed by the FLU in selected Sub-areas, and considers acreage that is susceptible to redevelopment. It is estimated that approximately 185 acres of the 1,300 acres that comprise the CRA district have potential for higher density residential redevelopment.

Conservatively, 3,970 bonus units are needed to support a 20-year build out, less the 930 units that still remain in the pool, reflecting the rounded down request for 3,000 units. The Urban General (UG), and Urban Highway (UH) Sub-areas act as receiving areas for a majority of the bonus density requested. Within these density clusters located along Congress Avenue and Okeechobee Blvd. 135 acres are susceptible to redevelopment, and the redevelopment of three large +/-40-acre sites drive the forecast. 990 bonus units from the Pool are allocated for the redevelopment of 42 acres on the Palm Beach Kennel Club site on Congress Avenue in the UG-Sub-area to supplement 210 units allowed by the future land use; another 680 for the redevelopment of a 40-acre mobile home park site on Okeechobee Blvd. in the same Sub-area. An estimated 880 bonus units are projected for a key 40-acre redevelopment site at the intersection of Okeechobee Blvd. and Military Trail within the UH Sub-area. The anticipated need for bonus density to achieve the build out of these three sites is 2,550 units. The remaining 1,420 bonus units that comprise the balance of the 20-year Density Bonus Pool are assigned to these key cluster Sub-areas, and other priority redevelopment Sub-areas for incremental residential and mixed-use redevelopment.

This amendment requests to restock and increase the number of bonus density units available in the WCRAO Density Bonus Pool, necessary to capture a continuing demand for workforce and market rate housing, furthering the goals and objectives the Westgate/Belvedere Homes Community Redevelopment Plan to revitalize the area. Survey results from a November 19, 2024 community meeting attended by a diverse group of residents and stakeholders indicate support for the initiative. The amendment complements the County's goals to encourage higher densities through redevelopment and infill in designated central urban areas, and the State's goal to provide housing for a growing population. The amendment is consistent with FLUE Policy 1.2.3-b which allows "the pool of units to be increased through amendments to the Comprehensive Plan text".

BACKGROUND

The Westgate/Belvedere Homes Community Redevelopment Agency is a dependent special district, created in 1989 pursuant to the Community Redevelopment Act, Chapter 163, Part III of Florida Statutes. The Westgate CRA is the only Community Redevelopment Agency in unincorporated Palm Beach County, acting as the redevelopment arm of the Board of County Commissioners for the Westgate area. The CRA is mandated to promote and facilitate the revitalization, redevelopment and economic development of the area within its boundaries, as outlined in its amended Community Redevelopment Plan.

The CRA District is represented in the Comprehensive Plan as the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO) in the Future Land Use Element, and as a Level of Service Exception area in the Transportation Element as the Westgate-Belvedere Homes Community Redevelopment Area Transportation Concurrency Exception Area (TCEA). The redevelopment area is centrally located in the U/S Tier of the County's Managed Growth Tier System. The WCRAO is within the Revitalization & Redevelopment Infill Overlay (RRIO), Urban Redevelopment Study Area (URA), and is a County Community Revitalization Team (CCRT) area.

The CRA's 2017 Community Redevelopment Plan updated the Agency's 1989 and 2005 redevelopment plans by shifting focus toward initiatives to encourage vertical redevelopment and economic development. Focus areas include: economic development and redevelopment, market positioning, housing, community engagement, public infrastructure and public spaces, and planning for redevelopment. Many projects and programs contemplated in all previous Plans are ongoing underscoring the long arc of sustainable community redevelopment. Improvements to stormwater storage capacity, roadway and pedestrian infrastructure, the creation of community amenities, and the preservation of affordable housing remain key priorities for the Agency.

Among the focus areas of the 2017 Redevelopment Plan is housing, with a goal to "create and maintain diverse, quality housing stock that addresses a mix of community, local and regional needs and income levels." The Plan outlines actions and funding mechanisms to support a Workforce Housing Incentives Program to "encourage the development of workforce housing, and a range of mixed income housing opportunities, [utilizing] various incentives, including the Density Bonus Program, the County's Workforce Housing Program, grant application assistance, land and drainage agreements, [and] expedited review..."

Fundamentally, the existing policies and intent of the WCRAO in both the Comprehensive Plan and the ULDC were born from the CRA's 2005 Plan which included several elements that involved changes to the existing physical development pattern, requiring modifications to land development regulations to achieve redevelopment. The Plan took a more comprehensive and visionary approach drawing from influential concepts in urban planning and design, new urbanism and smart growth principles that envisioned infill vertical redevelopment in older, urbanized areas to prevent sprawl. Diverse, walkable, compact, vibrant mixed-use communities assembled in an integrated way that contain housing, work, shopping, entertainment, parks, schools and civic facilities defines new urbanism, and the enduring vision for Westgate.

Following the adoption of the CRA's 2005 Community Redevelopment Plan, the Board of County Commissioners recognized the Westgate/Belvedere Homes Community Redevelopment Area as a receiving area for residential bonus provisions beyond the future land use, and committed an additional 1,000 density bonus units assigned to the area. Criteria for obtaining bonus density for a development project are contained in the WCRAO within the ULDC, which also serves as the implementing tool for the Density Bonus Pool program. To receive an allocation from the Density Bonus Pool, projects have an obligation to provide a percentage of workforce housing units, and must receive a positive recommendation of support from the CRA.

Companion revisions to the WCRAO in the ULDC in 2006 established WCRAO zoning Sub-areas since none of the existing zoning districts allowed for the combination of lot coverage, setbacks, and development intensity permitted by the Redevelopment Plan (see Figure 1, below). Today, property development regulations and incentives for the WCRAO zoning overlay favor a hybrid form-based code approach which focuses on both on physical form elements such as building orientation, placement and massing, to achieve urban form, as well as land use provisions, density bonus, and incentives to achieve redevelopment objectives. To facilitate viable residential density and mixed-use development, the WCRAO zoning overlay allows for additional height, reduced setbacks, modified landscape buffers and reduced parking ratios.

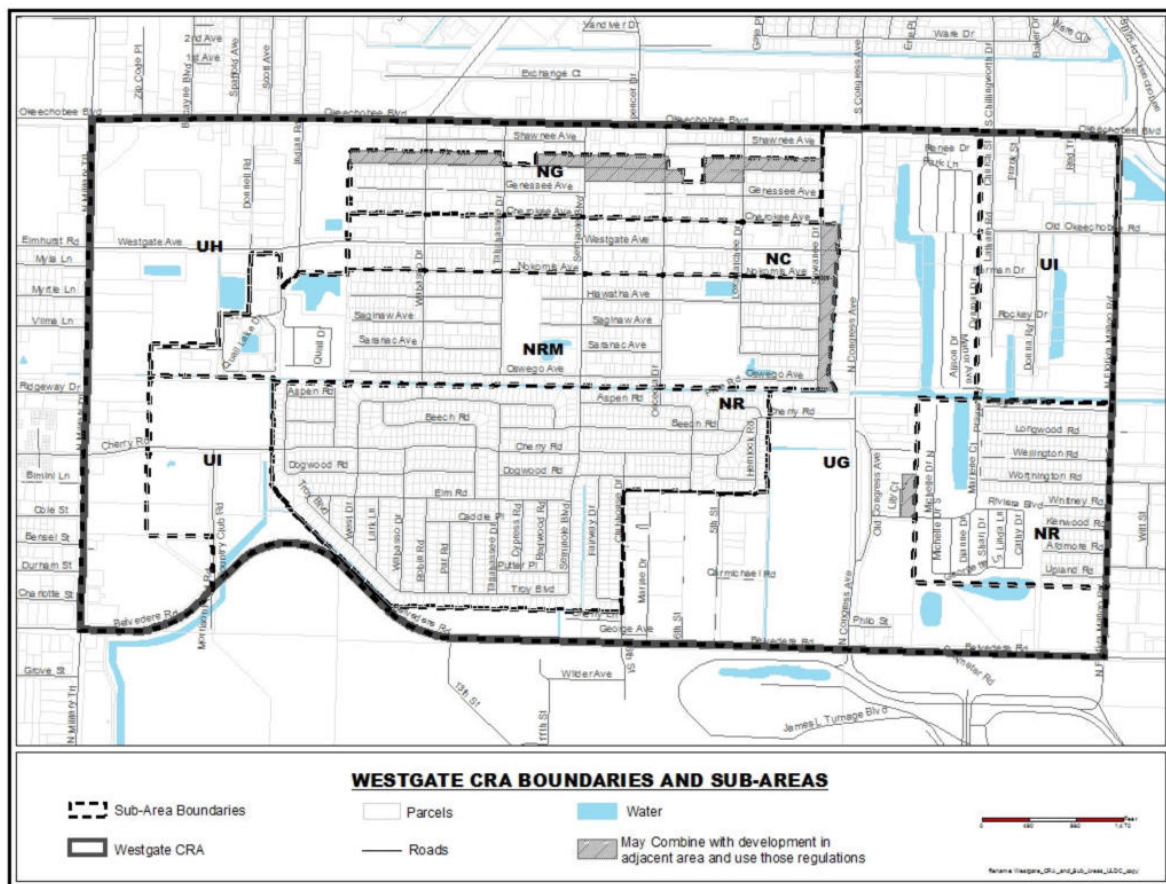


Figure 1. Westgate CRA Boundaries & WCRAO Zoning Overlay Sub-areas

JUSTIFICATION

Need for Density to Achieve Redevelopment:

The CRA District is located in a prime urban location, under 2 miles west of downtown West Palm Beach, with access to arterial roadways, I-95, transit, amenities, and services. A continued program of density bonus in this area will make more efficient use of underutilized land and contribute to sustainable infill urban growth. Higher residential density supports the goals of smart growth by reducing urban sprawl, promoting infill development. From a regional perspective, the intensification of development in the centralized redevelopment area offers several advantages. Provisions for higher density accommodates significant increment growth in an already developed urban area with sufficient levels of service and supporting infrastructure.

Increasing residential density through bonus incentives can serve as a catalyst for economic revitalization within the redevelopment area. By encouraging more residential development, the area will attract additional investment, both residential and commercial, leading to job creation and local economic growth. Increased density supports a vibrant local economy by expanding the consumer base for businesses, especially retail and service-oriented establishments. The long-term presence of new residents will continue to support the area's economy.

Constrained Conditions:

Many sectors of the CRA District cannot add more residential units either because they are built out, such as the Belvedere Homes and Belvedere Heights single family residential neighborhoods, or because they are incompatible lands not suitable for multifamily residential development, such as areas with an industrial future land use and zoning designation. The CRA can only encourage housing development in clusters, in areas designated for higher density to accomplish its housing development goals.

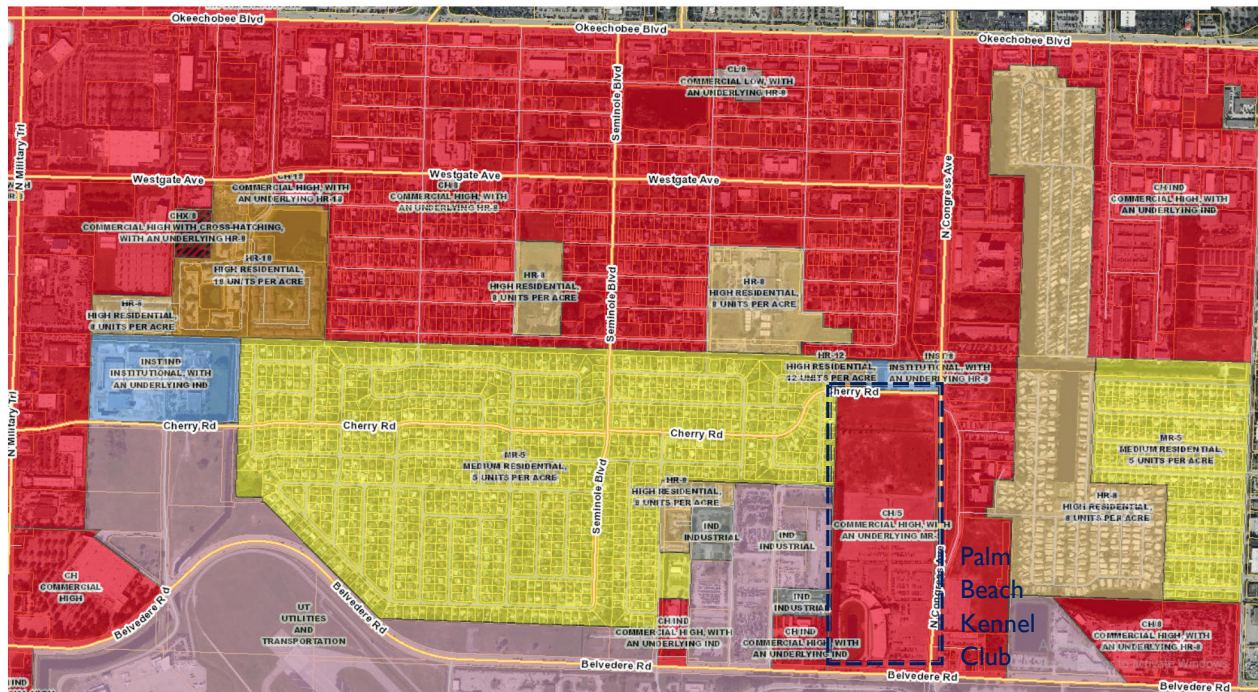


Figure 2. Future Land Use Map – WCRAO

The base density allowed by the future land use within the WCRAO, even when combined with other density bonus programs such as Transfer of Development Rights (TDR) and Workforce Housing Program (WHP) density incentives, is relatively too low to achieve urban infill redevelopment within the CRA District. The majority of the parcels in the WCRAO support a Commercial High (CH) future land use with an underlying residential future land use of 8 units per acre (see Figure 2). This low base density is inherent to the historic development pattern of unincorporated suburban Palm Beach County. Some higher density pockets of HR 12 and HR 18 do exist in the redevelopment area, along with MR-5 (5 units per acre) in single family neighborhoods, as well as Commercial Low (CL), Industrial (IND) and Institutional (INST) future land uses.

The WCRAO Density Bonus Pool serves as the established density bonus tool within the Westgate Area; others are available Countywide including the Workforce Housing Program (WHP), however, there are limitations. To achieve a density of 25 du/ac, all bonus density incentives within the WHP must be fully exhausted, often Transfer of Development Rights (TDRs) must be purchased and layered to base and bonus densities to realize the project units, and a future land use amendment is often still required to increase the base from MR-5 or HR-8 to HR-12 as the starting point in the entitlements process. The Board is beginning to approve greater densities within residential and mixed-use projects within the U/S Tier: Fount MUPD (Ord. 2022-013) on Okeechobee Blvd. was approved for 708 residential units on 27.66 acres. The application included a FLU amendment to increase the base density from 8 du/ac to 12 du/ac, and the purchase of 111 TDRs, to yield an overall project density of 25.6 du/ac.

Combined with other approved developments over the past several years (Lennox North Beach—22.4 du/ac on 11.14 acres; R80 Residential—25 du/ac on 11.46 acres), these projects indicate a general inclination of the Board to approve densities greater than the base future land use.

Within the WCRAO, two constructed projects along Congress Avenue within the Urban General (UG) Sub-area serve as examples of how the Density Bonus Pool functions to increase density without the need for a Future Land Use Atlas amendment:

- Autumn Ridge (Control# 2020-0152) — CH/8 FLU, 106 units on 3.62 acres utilized 29 dwelling units from the FLU, and 77 units from the Pool to achieve an overall density of 29.3 du/ac. The project provides 100% affordable housing for seniors
- Brandon Estates (Control# 2016-00052) — CH/8 FLU, 198 units on 7.48 acres utilized 60 units from the FLU, and 138 units from the Pool to achieve an overall density of 26.4 du/ac. The project provides 60 workforce housing units.

The CRA proposes to utilize the base residential future land use, plus allowable bonus density to maximize overall residential density in underutilized areas to accommodate additional units in the community. However, maximizing density on existing developable land alone will not bring that much needed residents in the area because of continued constraints in the area. A vast amount of land within CRA district is County or Airport owned reducing the overall acreage available for redevelopment. One of the primary purposes of a Community Redevelopment Agency is to address the infrastructure needs that contribute to blight. The CRA District sits within the C-51 drainage basin requiring a percentage of a parcel to be set aside for stormwater storage, reducing buildable area.

These constraints, along with few vacant lots, lend themselves to scarcity of developable lands in the area. Retention projects have taken a greater percentage of available developable land. The C-51 rule requires as much as 30% of parcels to be set aside for on-site water retention leaving little left for actual development. To address this ongoing issue, the CRA has constructed a number of retention ponds in the North & South Westgate Estates neighborhoods. The CRA established a Stormwater Storage Mitigation Bank through South Florida Water Management District (SFWMD) that would enable developers to utilize “stormwater redevelopment credits” to meet their stormwater storage requirements. The mitigation bank utilizes the Central Lake, also known as the Dennis P. Koehler Preserve, a 6.85-acre retention lake completed by the CRA in collaboration with the County in 2012, for additional stormwater storage. To date, three major development projects on Congress Avenue, the lowest point of the C-51 basin, have utilized stormwater redevelopment credits, representing a substantial savings to development costs. The CRA continues to work with SFWMD to add more retention lake credits to the mitigation bank. The CRA District is unlike any other County-designated infill redevelopment area; the Agency has been working toward correcting level of service deficiencies in sidewalks, streetlights, sanitary sewer and stormwater storage since its creation through its TIF, combined with grants, without a cost burden to the County since its creation in 1989.

Addressing a Local Need for Housing Production: The Palm Beach County Housing Leadership Coalition 2023 Housing Action Plan outlined specific actions to “produce, rehabilitate and preserve 20,000 units of workforce and affordable housing by 2032.” (<https://www.hlcpbc.org/housing-plan-meetings-and-resources/>) The plan is based on the 2020 Palm Beach County Affordable Housing Needs Assessment, a quantitative and qualitative study that explored links between housing supply, affordability, and demand. The assessment examines growth and change in the local labor market, migration patterns post-pandemic, housing values, household income and composition, noting the need for urgent action to address housing affordability issues. Among actions recommended is an “immediate focus on rental housing preservation and production.” The Housing Action Plan states that “Palm Beach County has an affordable and workforce housing crisis”. A shortage of quality housing stock at

all levels of affordability impacts business retention and attraction, overall economic growth, and quality of life. The Plan further identifies areas of opportunity to correct the crisis through: funding and financing, planning and regulatory reform, neighborhood revitalization and community development, and racial equity.

The CRA's request to replenish and increase the Density Bonus Pool furthers the goals of the Housing Action Plan. One of the primary justifications for increasing residential bonus density is to promote housing for all income levels within the redevelopment area. The demand for housing, particularly affordable housing in urban areas is growing due to increasing populations, rising rents, and limited available land. By increasing residential bonus density, developers can be incentivized to provide more affordable units in the project, which directly contributes to addressing the County's housing shortage. The table below shows that the population growth within the CRA boundaries and within a 1-mile radius are outpacing overall population growth County-wide.

2024-2029 Population Growth Rate	
Area	Growth Rate
Westgate CRA District	1.53%
Westgate CRA District – 1-mile radius	1.32%
Zip code 33409 (West Palm Beach)	0.74%
Palm Beach County	0.47%
Florida	0.93%
USA	0.38%

Table 1. 2024-2029 Population Growth Rate

Source: ArcGIS Business Analyst data compiled by CRA Staff

Missing Middle Housing:

To facilitate future larger-scale redevelopment, well-designed “missing middle” developments can offer a lower density alternative along secondary corridors and transitional areas of the CRA District. Missing middle building types, such as two and three-story townhouses, fourplexes, courtyard buildings, or live/work projects provide a diversity of housing options and support locally-serving retail and public transportation options. The CRA has seen an increase in residential projects on less than one acre that utilize the WCRAO Density Bonus Pool to achieve an overall density of 15-18 du/acre. This highlights the flexibility of the Density Bonus Program to be utilized in a variety of residential projects, each contributing to new housing stock. With the Westgate Avenue streetscape project currently underway, the CRA anticipates more commercial redevelopment and rehabilitation will follow. “Missing Middle Housing helps solve the mismatch between the available U.S. housing stock and shifting demographics combined with the growing demand for walkability”. (<https://missingmiddlehousing.com/>) Opticos Design describes this type of housing as missing because it is typically not seen in either urban areas, where higher density multifamily is prevalent, or suburban neighborhoods, where single-family dominates. The form and scale of “missing middle” housing differs in number of units and affordability, both in construction and end-user rents. The WCRAO Density Bonus Pool allows for missing middle housing to occur on smaller infill sites that otherwise would be restricted by site size, and the underlying future land use.

Methodology of Request:

To implement the Westgate/Belvedere Homes Community Redevelopment Plan and FLUE Policy 1.2.3-b, Density Bonus Pool, areas within the CRA district with capacity for

redevelopment, geographically represented by WCRAO sub-areas within the ULDC, are allocated a maximum number of possible bonus units per acre (see Figure 3, below). Sub-areas that comprise arterial corridors such as Congress Avenue within the Urban General (UG) Sub-area, and Okeechobee Blvd. within the Urban Highway (UH) Sub-area are permitted a higher number of density bonus units per acre to encourage transit adjacent development. The Neighborhood Commercial (NC) Sub-area, the focal redevelopment corridor of the CRA District, is targeted for medium density mixed-use. Sub-areas in transitional zones, such as the Neighborhood General (NG) and the Neighborhood Residential – Medium Density (NRM), ideal for smaller scale mixed-use development and missing middle housing, are capped at a lesser number.

Table 3.B.14.H – WCRAO Density Bonus Pool Limits

Sub-areas	NR	NRM	NG	NC	UG	UH	UI
Max. WCRAO Density Bonus per ac.	N/A	20	30	50	150	150	N/A
[Ord. 2006-004] [Ord. 2021-006]							

Figure 3. WCRAO Density Bonus Pool Limits

The build out analysis supporting this amendment request presupposes the preservation of single-family neighborhoods of Belvedere Homes and Belvedere Heights. These neighborhoods support an MR-5 FLU, and are not receiving areas for increased density. Redevelopment strategies within the single-family areas of the CRA District focus on affordable and workforce housing preservation and improvement, with reimbursable grant funding available to homeowners seeking to leverage investments to their property. Similarly, industrial zones with an IND FLU, are not assigned higher densities within those corresponding ULDC WCRAO Sub-areas.

**Figure 4. Conceptual
Redevelopment Outlook of the
Westgate Area – 2005
Redevelopment Plan**



The justification for the 2005 text amendment to the Density Bonus Program that increased the Pool to 1,300 units examined the potential for redevelopment within selected Transportation Analysis Zones (TAZ) to determine by block group the trajectory of a build out scenario where clustered housing is encouraged according to Community Redevelopment Plan (see Figure 4, previous page). At that time, the area had 6 TAZ; today the area has 21 TAZ. Build out modeling in 2005 was correlated to impact on roadways, represented by traffic trips. But using a TAZ framework as a development forecasting tool exclusively in a redevelopment area has limitations. The 2005 forecast was predicated on a redevelopment outlook that mirrors the current request, however, “susceptibility to change” density cluster areas have evolved slightly from 2005 text amendment.

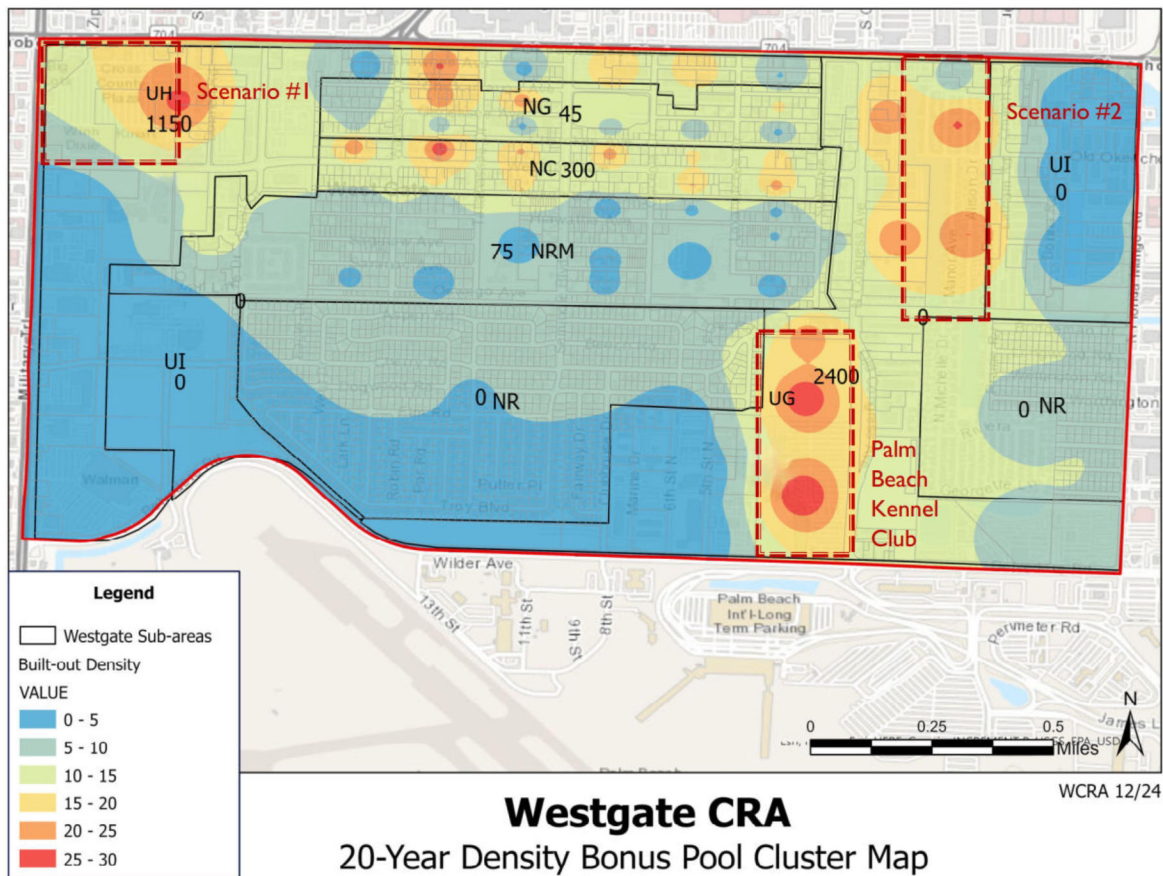


Figure 5. 2024 Density Bonus Receiving Areas “Heat” Map by WCRAO Sub-area

Source: Prepared by CRA Staff

The framework for modeling the build out scenario is based on a number of factors. The development outlook now considers transit-oriented, mixed-use development density clusters along Okeechobee Blvd., and within transitional areas between Okeechobee Blvd. and Westgate Avenue, as well as south of Westgate Avenue for missing middle housing. See Figure 5 above for a heat map indicating projected density clusters highlighting areas in red and orange with a potential for 20-30 du/acre. The 2005 model excluded the redevelopment of the 47-acre Kennel Club property. The development program project proposes 1,200 residential units. The CRA is requesting an increase of 3,000 units that would replenish and increase the existing pool of 1,300 units, with the remaining units to be allocated to various projects both large and small, across a 20-year build out horizon, including to the Kennel Club project.

The WCRAO Sub-areas are fully established, and Density Bonus Pool limits determine the intensity of residential redevelopment. To support the request for an additional 3,000 units, modelling is organized by density clusters corresponding to each WCRAO Sub-area, and the per acre bonus density limitations codified in the WCRAO. The analysis assumes a continued strong output of housing on underutilized and blighted land in the CRA district, over a 20-year long range forecast. Total build out is based on 8 units per acre as the highest by-right density allowed by the FLU, existing viable units, and the number of acres considered as “susceptible to redevelopment” based on potential for future redevelopment and historic trends. The table below (Table 2) illustrates the number of units needed to accomplish housing development program.

20-Year Density Bonus Program - Multifamily Unit Projection								
WCRAO Sub-areas	UG	UI	NR	UH	NG	NC	NRM	Total
Total Multi-family Build Out	3604			2150	500	756	695	7705
Existing Multi-family Units	564			560	335	296	500	2255
Projected Multi-family Units	3040			1590	165	460	195	5450
Acres Susceptible to Redevelopment	80			55	15	20	15	185
FLU Base Density	8			8	8	8	8	8
By Right Units	640			440	120	160	120	1480
20-year Density Bonus Pool	2400			1150	45	300	75	3970
Less Remaining Units in Density Bonus Pool								930
Density Bonus Pool Increase Request								3040

Table 2. 20-Year Bonus Program – Multifamily Unit Projection

Source: Prepared by CRA staff

Projection Assumptions:

- Modeling estimates 3,040 density bonus units are needed in the Pool; request is for 3,000 additional units rounded down
- Total multi-family build out represents existing viable units, planned development, and potential housing stock in areas susceptible to redevelopment
- 8 units per acre is generally the highest density allowed by FLU in selected Sub-areas
- Projected multi-family units assumes high density redevelopment on larger underutilized sites, and incremental redevelopment in WCRAO Sub-areas targeted as receiving areas for Density Bonus
- Pool units are needed to make up the difference between what's allowed by right in the FLU, planned residential or mixed- use projects, and future residential build out based on the goals of the Redevelopment Plan

Modeling projects a total build out of 5,754 units within the Urban General (UG), and Urban Highway (UH) Sub-areas alone, which act as receiving areas for the most bonus density. Within these density clusters located along Congress Avenue and Okeechobee Blvd. the redevelopment of several large +/-40-acre sites drive the forecast. 4,630 new multi-family units are projected, including 1,200 units planned for the Palm Beach Kennel Club site on Congress Avenue. An estimated 1,124 units are considered viable and remain as existing. 135 acres are susceptible to redevelopment, and by applying 8 du/ac as the base density, 1,080 units are permitted by the future land use in these Sub-areas. To close the gap, the difference between existing units and by right density and total future build out projections, a total of 3,550 Pool units are needed. The remaining 420 units that comprise the balance of the 20-year Density Bonus Pool are assigned to other priority redevelopment areas for incremental residential redevelopment such as the Westgate Avenue corridor, and areas between Westgate Avenue and Okeechobee Blvd.

Urban Highway (UH) Sub-area Redevelopment Scenario #1:

- 55 acres of land with potential for redevelopment in the Sub-area
- Includes the +/- 40-acre Cross County Mall site at the intersection of Okeechobee Blvd. and N. Military Trail, and 15 acres of underutilized parcels Okeechobee Blvd. extending to Congress Avenue for TOD, and redevelopment opportunities on Donnell Road
- Cluster density area with projection of 1,590 new MF dwelling units over 20-year build out
- Assume less 440 units permitted by right through FLU to equal a bonus density of 1,150 units for the Sub-area

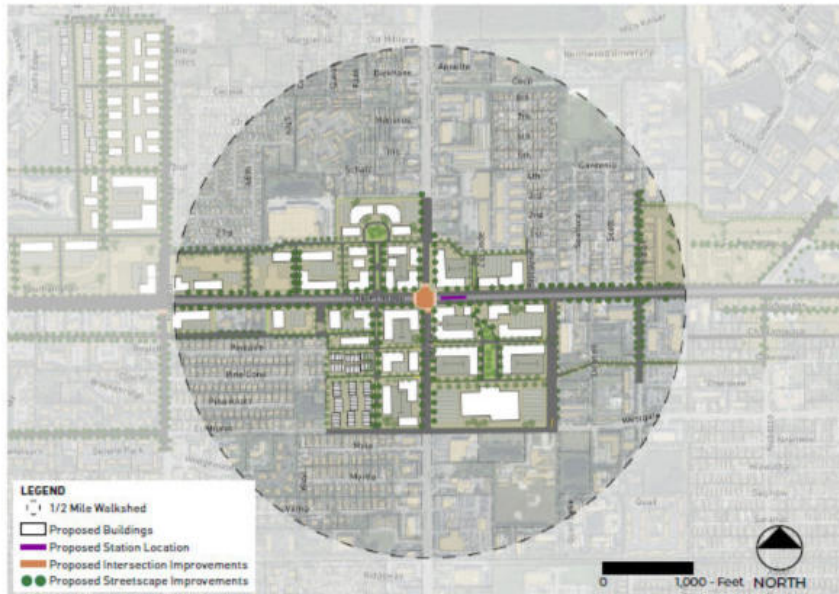


Figure 6. Palm Beach TPA Okeechobee Blvd. to SR-7 Multimodal Corridor Study – Military Trail Station concept for TOD vision

Source: <https://palmbeachtpa.org/wp-content/uploads/2022/12/Okeechobee-Blvd-SR-7-Multimodal-Corridor-Study-Full-Report-with-Appendices-1.pdf>

Potential Redevelopment Site – 40-acre MUPD at SE corner of Military Trail & Okeechobee Blvd.

- Prime location at the intersection of two major County arterial roadways
- Palm Beach TPA Okeechobee Blvd. & Multimodal Corridor Study – Land Use & Economic Development Report (November 2022) -- <https://palmbeachtpa.org/wp-content/uploads/2022/12/Okeechobee-Blvd-SR-7-Multimodal-Corridor-Study-Full-Report-with-Appendices-1.pdf> envisions a District/Town Center typology with a transit station at this intersection. The Study projects a little over 1,000 new housing units through residential infill redevelopment and the commercial redevelopment of big box retailers within the transit station area. Transit oriented development at this location would support existing Palm Tran ridership routes and transfers along Military Trail.
- To achieve an overall density of 30 du/ac on the 40-acre MUPD site, 880 units would be needed from the Density Bonus Pool
- 8 du/ac or 320 units from the base, and 22 du/ac or 880 units from the DBP
- Leaving 270 DBP units for other redevelopment scenarios within the cluster area

Urban General (UG) Sub-area Redevelopment Scenario #2:

- Conservative estimate of 80 acres of land with potential for redevelopment in the Sub-area
- Includes the +/- 47-acre Palm Beach Kennel Club site at the intersection of Congress Avenue and Belvedere Road with a planned redevelopment project proposing 1,200 housing units on 42 acres with a CH/5 FLU; a 40-acre mobile home park on Okeechobee Blvd., as well as redevelopment opportunities on varying, smaller sites along Congress Avenue and Belvedere Road.
- Cluster density area with projection of 3,040 MF dwelling units over 20-year build out
- Assumes less 640 units permitted by right through FLU to equal a bonus density of 2,400 units for the Sub-area
- 990 units are allocated the planned PBKC project

Potential Redevelopment Site – 40-acre mobile home park along Okeechobee Blvd. at Manor Ave.

- To achieve an overall density of 25 du/ac on the 40-acre mobile home park site, 680 units would be needed from the Density Bonus Pool
- 8 du/ac or 320 units from the base, and 17 du/ac or 680 units from the DBP
- Leaving DBP for other redevelopment scenarios within the cluster area (considers 990 less from PBKC)

Community Input:

The CRA held a community meeting on November 19, 2024 to present the text amendment to increase the number of units available in the WCRAO Density Bonus Pool to key stakeholders. The meeting was attended by a diverse group representing residents, property and business owners, developers, industry stakeholders, and County Staff. 20 individuals responded to the survey during the meeting, with an additional 30 responses collected from residents and other stakeholders in the weeks following the meeting. The initiative is supported by the broader community; 90% responded in favor, with 10% opposed. A survey asked: “Do you support restocking housing units in the Density Bonus Program for future development?” Supporters highlighted its potential to boost redevelopment along major corridors, streamline housing development processes, and address Palm Beach County’s housing shortage. They also saw it as an important step for beautifying and growing the Westgate CRA while increasing affordable housing options. Opponents raised concerns about the survey’s limited representation of the broader Westgate community. They felt the program might favor developers over existing residents and interior areas. Some also questioned whether increasing density would truly provide affordable housing for low-income residents.

Mobility Strategies:

The mobility strategies proposed to address the impacts of adding 3,000 more units within the Westgate Community Redevelopment Area focus on ensuring that traffic flow and roadway capacity are effectively managed throughout the 20-year build-out projection. A traffic statement prepared by Pinder-Troutman indicates that the increase in residential development within the CRA District will have an impact on the surrounding traffic over the 20-year forecast. This growth is expected to primarily impact key arterial roadways that bound the CRA district, including Okeechobee Boulevard, North Military Trail, and Congress Avenue, all of which will experience increased trip generation.

To mitigate these impacts, internalization of trips within the district is a key strategy. This can be achieved through the implementation of traffic management strategies and other initiatives aimed at reducing the strain on external roadways, such as mixed-use development. Each development project that utilizes bonus density from the WCRAO Density Bonus Pool will be required to assess its traffic impact as part of the concurrency process; projects have the ability to utilize the Westgate TCEA pool of trips with CRA concurrence. This ensures that the

cumulative effects of development are addressed in the most efficient way as per ULDC and Statutory requirements.

The traffic management strategies for addressing the increased density within the Westgate CRA focus on enhancing transportation options and reducing the reliance on automobiles, in line with the goals outlined in the CRA Plan for transportation and roadway improvements. Ongoing partnerships and coordination with the Palm Beach Transportation Planning Agency (TPA), Palm Tran, Palm Beach International Airport, and the County's Traffic Division will guide the implementation of strategies to improve mobility within the area.

The CRA has a continuing program to implement streetscape improvements and complete streets on key roadways within the District. Through a partnership with the County, the Palm Beach Transportation Agency (TPA) and FDOT, the CRA has completed two pedestrian improvement projects in the Belvedere Heights neighborhood that facilitate walkability. Complete streets projects are underway on Seminole Blvd., a main north-south connector corridor, and Westgate Avenue. The Seminole Blvd. project adds multi-use paths and pedestrian lighting. The Westgate Avenue project represents a substantial investment by the CRA, acting as both a capital improvements project and an economic development driver. The project will reduce travel lanes from 5 lanes to three, add bike lanes, street trees, pedestrian lighting and on-street parking where available. This is anticipated to help reduce vehicular traffic by encouraging use of alternative modes of transportation.

One primary goal is to encourage the use of alternative modes of transportation. This includes the addition of bike lanes or multiuse paths and the development of areas with active uses to support walkability. Given the CRA's centralized location and its emphasis on infill redevelopment, the area offers a significant opportunity to reduce vehicle dependence. The inclusion of mixed-use developments and increased site interconnectivity will allow for internal trip capture, which helps reduce traffic congestion by providing convenient destinations within walking distance.

Public transit improvements will also play a critical role. Enhanced transit stations along Congress Avenue are planned, with efforts to address gaps in public transportation coverage. Ongoing collaboration with Palm Tran is focused on expanding transit service, especially in density target areas, to improve connectivity and service availability. The existing Palm Tran routes, including Routes 3, 40, 43, and 44, provide essential service within the CRA, but there are opportunities for expansion and improvement. Route 3, for example, serves Military Trail, with a major stop at the Cross County Plaza. Route 40, which connects the Intermodal Transit Center to Belle Glade, stops at Okeechobee and Congress Avenue, while Route 43 serves Okeechobee Boulevard, providing easy transfers at key intersections. Route 44 offers flexibility with a loop through the middle of the CRA, providing access to various local streets and connections to the airport.

The TPA is currently working to improve Route 40, aiming to enhance connectivity between the Intermodal Transit Center and the Palm Beach County Airport. Additionally, Palm Tran is looking to improve Route 44 by adding more buses to increase their frequency. These improvements will not only strengthen the local transit network but also improve overall access and mobility within the CRA.

Further strategies to manage traffic include the implementation of "density-based traffic control systems," such as updated signalization and the development of more connected street networks. Drawing on findings from an archived HUD Arizona study (https://archives.huduser.gov/scrc/sustainability/newsletter_092712_3.html), it is clear that increasing residential density, along with diverse land uses, improved neighborhood walkability, and regional job access through public transit, reduces vehicle miles traveled (VMT) and

encourages the use of walking and transit options. These principles, known as the "4 Ds" — Density, Diversity, Design, and Destinations — will be incorporated into traffic mitigation strategies to reduce automobile trips and VMT.

A shuttle service, similar to the Freebee or PSLX Palm Tran service, is under consideration for the Congress Avenue corridor to connect residents and commuters to the Intermodal Transit Center on downtown. This service, potentially funded through CRA or developer partnerships, would improve local mobility and facilitate access to regional transit hubs. Additionally, improvements to the road infrastructure, such as the widening of Congress Avenue and L2 canal improvements will create better routes while helping to divert traffic from Okeechobee Boulevard.

The Palm Beach TPA conducted a comprehensive study of the Okeechobee Blvd. to SR-7 corridor in 2022 to explore additional strategies for improved mobility and transit options. These efforts are being complemented by initiatives such as 15-minute bus service on major routes, implemented in September 2024, and the introduction of transit signal prioritization, which will help improve service efficiency, particularly during peak hours. A focus on limited stops and additional operations for bus Route 40 will increase efficiency and connectivity to key destinations, including the airport and the intermodal station.

Additional strategies focus on enhancing the transit infrastructure, with a plan to add more transit shelters over the next five years, and the potential to establish rapid transit lanes to provide faster and more reliable bus service. These strategies, supported by the TPA and Palm Tran, will create a robust, multimodal transportation network that effectively manages the mobility impacts of the proposed density increase within the Westgate CRA redevelopment area.

Conclusion:

The WCRAO Density Bonus Pool creates a competitive advantage for the redevelopment area, making it more attractive to potential developers. In areas where land is scarce or costly, developers need sufficient incentives to invest in projects that might otherwise be financially challenging. The increased density allows for more units to be developed, improving the economic feasibility of a project. This, in turn, makes the area more competitive compared to others without such incentives, encouraging private investment and accelerating the redevelopment process.

The request proposed by the CRA is in support of County 'housing for all' goals, the goals and objectives of the CRA's Community Redevelopment Plan, and regional and state efforts to encourage urban infill redevelopment in centralized areas. The proposed additional density bonus pool units allow higher land use intensity and density resulting in a stronger output of housing units than allowed by the existing future land use. The required additional units will contribute to providing much needed housing stock for the County's growing population.

Exhibit 2B

Updated Justification Statement provided by Westgate CRA (9/10/25)

SUMMARY OF REQUEST

This County proposed text amendment is requested by the Westgate/Belvedere Homes Community Redevelopment Agency to revise Future Land Use Element (FLUE) Sub-Objective 1.2.3., Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO), specifically Policy 1.2.3-b, Density Bonus Pool. The request supports ongoing development and redevelopment activities outlined in the Agency's 2005 and 2017 Community Redevelopment Plans. This amendment seeks to increase the number of bonus units available in the pool to support the Agency's 20-year build out development horizon, and the ongoing need for housing production countywide.

The CRA's Community Redevelopment Plan proposes smart growth principles and regulatory incentives to orient density toward the Westgate area. This is supported by its central location, transit opportunities, and improved infrastructure capacity. Through a Comprehensive Plan text amendment in 2005, the Board of County Commissioners recognized the Westgate/Belvedere Homes Community Redevelopment Area as a receiving area for commercial and residential bonus provisions beyond what is contemplated by the future land use and established a density pool of 1,300 bonus units assigned to the area. The pool of units was originally 300; the 2005 text amendment represented an increase of 1,000 previously assigned through the Policy. This revision seeks to replenish and increase the number of bonus units available in the Pool through the Policy by 3,000, to a total of 4,300, to facilitate housing, and the CRA's long range build out projections. The acceleration of planned, entitled and constructed residential development is depleting the Pool.

The request facilitates the future residential build out of key areas within the CRA boundaries with potential for redevelopment, supported by the goals of the Redevelopment Plan. These key areas are represented as density clusters within corresponding ULDC WCRAO Sub-areas. The implementation of the Density Bonus Pool is codified in the ULDC WCRAO, with criteria for obtaining bonus density, approvals processes, and Pool limits by Sub-area based on capacity for redevelopment. It is important to note that an allocation within the Policy language of the Comprehensive Plan does not necessarily equate to development on the ground. Multiple, often unforeseen factors, can impact development cycles, and housing market trends. It is possible that the build out scenario remains a projection, and is never fully realized.

The amendment request is triggered by the planned redevelopment of the historic 47-acre Palm Beach Kennel Club site within the CRA district which supports a commercial high, with an underlying 5 units per acre future land use (CH/5 FLU). The redevelopment of the site was not previously contemplated in the 2005 assignment of 1,300 bonus units. This landmark redevelopment project proposes 1,145 residential units in a phased program. To realize the residential density needed, the project will seek bonus density through the WCRAO Density Bonus Pool for the purpose it was established: to facilitate expedited residential and mixed-use redevelopment within the Westgate area without the need for Future Land Use Atlas amendments. The redevelopment project, Westgate Village MUPD, proposes 405 residential units on 16.05 acres in its first phase. 740 bonus units are planned for subsequent phases. Phase 1 is currently seeking entitlements.

At the time of BCC Initiation for the text amendment in July 2024, approximately 930 units remained in the Pool; as of September 2025, the Pool decreased by 307 units to 623 available units; an overall decrease in the Program Pool of over 52%. This balance reflects the CRA's

allocation of 33 bonus units to the Neighborlee Living Westgate project (SV/ZV/Z/CA-2025-00428, Control # 2025-00030), also recommended for approval by the Zoning Commission at their September 4, 2025 meeting; 325 bonus units to the Westgate Village MUPD project (ABN/ZV/PDD/CA-2025-00406, Control # 1983-00050); and, the return of 52 bonus units to the Pool from the expiration of the Development Order for Westgate One (R-2008-1385, Control No. 2007-00343).

The 20-year Density Bonus Program Multifamily Unit Projection models a total build out scenario that balances existing viable multi-family units, planned development, and a projection for new multi-family units over time. The analysis assumes that 8 units per acre is generally the highest density allowed by the FLU in selected Sub-areas, and considers acreage that is susceptible to redevelopment. It is estimated that approximately 185 acres of the 1,300 acres that comprise the CRA district have potential for higher density residential redevelopment. Conservatively, 3,663 bonus units are needed to support a future 20-year build out, less the 623 units that still remain in the Pool to equal 3,040; reflecting the rounded down request for 3,000 units.

The Urban General (UG), and Urban Highway (UH) Sub-areas act as receiving areas for a majority of the bonus density requested through this amendment. Within these density clusters located along Congress Avenue and Okeechobee Blvd. 135 acres are susceptible to redevelopment, and the redevelopment of three large +/-40-acre sites drive the forecast. Approximately 935 bonus units from the Pool are allocated for the redevelopment of 42 acres on the Palm Beach Kennel Club site on Congress Avenue in the UG-Sub-area to supplement 210 units allowed by the future land use (including those allocated to Phase 1); another 680 for the redevelopment of a 40-acre mobile home park site on Okeechobee Blvd. in the same Sub-area. An estimated 880 bonus units are projected for a key 40-acre redevelopment site at the intersection of Okeechobee Blvd. and Military Trail within the UH Sub-area. The anticipated need for bonus density to achieve the build out of these three sites is 2,495 units. The remaining 1,475 bonus units that comprise the balance of the 20-year Density Bonus Pool are assigned to these key cluster Sub-areas, and other priority redevelopment Sub-areas for incremental residential and mixed-use redevelopment.

This amendment requests to restock and increase the number of bonus density units available in the WCRAO Density Bonus Pool, necessary to capture a continuing demand for workforce and market rate housing, furthering the goals and objectives the Westgate/Belvedere Homes Community Redevelopment Plan to revitalize the area. Survey results from a November 19, 2024 community meeting attended by a diverse group of residents and stakeholders indicate a general support for the initiative. The amendment complements the County's goals to encourage higher densities through redevelopment and infill in designated central urban areas, and the State's goal to provide housing for a growing population. The amendment is consistent with FLUE Policy 1.2.3-b which allows "the pool of units to be increased through amendments to the Comprehensive Plan text".

BACKGROUND

The Westgate/Belvedere Homes Community Redevelopment Agency is a dependent special district, created in 1989 pursuant to the Community Redevelopment Act, Chapter 163, Part III of Florida Statutes. The Westgate CRA is the only Community Redevelopment Agency in unincorporated Palm Beach County, acting as the redevelopment arm of the Board of County Commissioners for the Westgate area. The CRA is mandated to promote and facilitate the revitalization, redevelopment and economic development of the area within its boundaries, as outlined in its amended Community Redevelopment Plan.

The CRA District is represented in the Comprehensive Plan as the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO) in the Future Land Use Element, and as a Level of Service Exception area in the Transportation Element as the Westgate-Belvedere Homes Community Redevelopment Area Transportation Concurrency Exception Area (TCEA). The redevelopment area is centrally located in the U/S Tier of the County's Managed Growth Tier System. The WCRAO is within the Revitalization & Redevelopment Infill Overlay (RRIO), Urban Redevelopment Study Area (URA), and is a County Community Revitalization Team (CCRT) area.

The CRA's 2017 Community Redevelopment Plan updated the Agency's 1989 and 2005 redevelopment plans by shifting focus toward initiatives to encourage vertical redevelopment and economic development. Focus areas include: economic development and redevelopment, market positioning, housing, community engagement, public infrastructure and public spaces, and planning for redevelopment. Many projects and programs contemplated in all previous Plans are ongoing underscoring the long arc of sustainable community redevelopment. Improvements to stormwater storage capacity, roadway and pedestrian infrastructure, the creation of community amenities, and the preservation of affordable housing remain key priorities for the Agency.

Among the focus areas of the 2017 Redevelopment Plan is housing, with a goal to "create and maintain diverse, quality housing stock that addresses a mix of community, local and regional needs and income levels." The Plan outlines actions and funding mechanisms to support a Workforce Housing Incentives Program to "encourage the development of workforce housing, and a range of mixed income housing opportunities, [utilizing] various incentives, including the Density Bonus Program, the County's Workforce Housing Program, grant application assistance, land and drainage agreements, [and] expedited review..."

Fundamentally, the existing policies and intent of the WCRAO in both the Comprehensive Plan and the ULDC were born from the CRA's 2005 Plan which included several elements that involved changes to the existing physical development pattern, requiring modifications to land development regulations to achieve redevelopment. The Plan took a more comprehensive and visionary approach drawing from influential concepts in urban planning and design, new urbanism and smart growth principles that envisioned infill vertical redevelopment in older, urbanized areas to prevent sprawl. Diverse, walkable, compact, vibrant mixed-use communities assembled in an integrated way that contain housing, work, shopping, entertainment, parks, schools and civic facilities defines new urbanism, and the enduring vision for Westgate.

Following the adoption of the CRA's 2005 Community Redevelopment Plan, the Board of County Commissioners recognized the Westgate/Belvedere Homes Community Redevelopment Area as a receiving area for residential bonus provisions beyond the future land use, and committed an additional 1,000 density bonus units assigned to the area. Criteria for obtaining bonus density for a development project are contained in the WCRAO within the ULDC, which also serves as the implementing tool for the Density Bonus Pool program. To receive an allocation from the Density Bonus Pool, projects have an obligation to provide a percentage of workforce housing units, and must receive a positive recommendation of support from the CRA.

Companion revisions to the WCRAO in the ULDC in 2006 established WCRAO zoning Sub-areas since none of the existing zoning districts allowed for the combination of lot coverage, setbacks, and development intensity permitted by the Redevelopment Plan (see Figure 1, below). Today, property development regulations and incentives for the WCRAO zoning overlay favor a hybrid form-based code approach which focuses on both on physical form elements such as building orientation, placement and massing, to achieve urban form, as well as land use provisions, density bonus, and incentives to achieve redevelopment objectives. To facilitate

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THE CRA DURING THE 1990s

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Constrained Conditions:

Many sectors of the CRA District cannot add more residential units either because they are built out, such as the Belvedere Homes and Belvedere Heights single family residential neighborhoods, or because they are incompatible lands not suitable for multifamily residential development, such as areas with an industrial future land use and zoning designation. The CRA can only encourage housing development in clusters, in areas designated for higher density to accomplish its housing development goals.

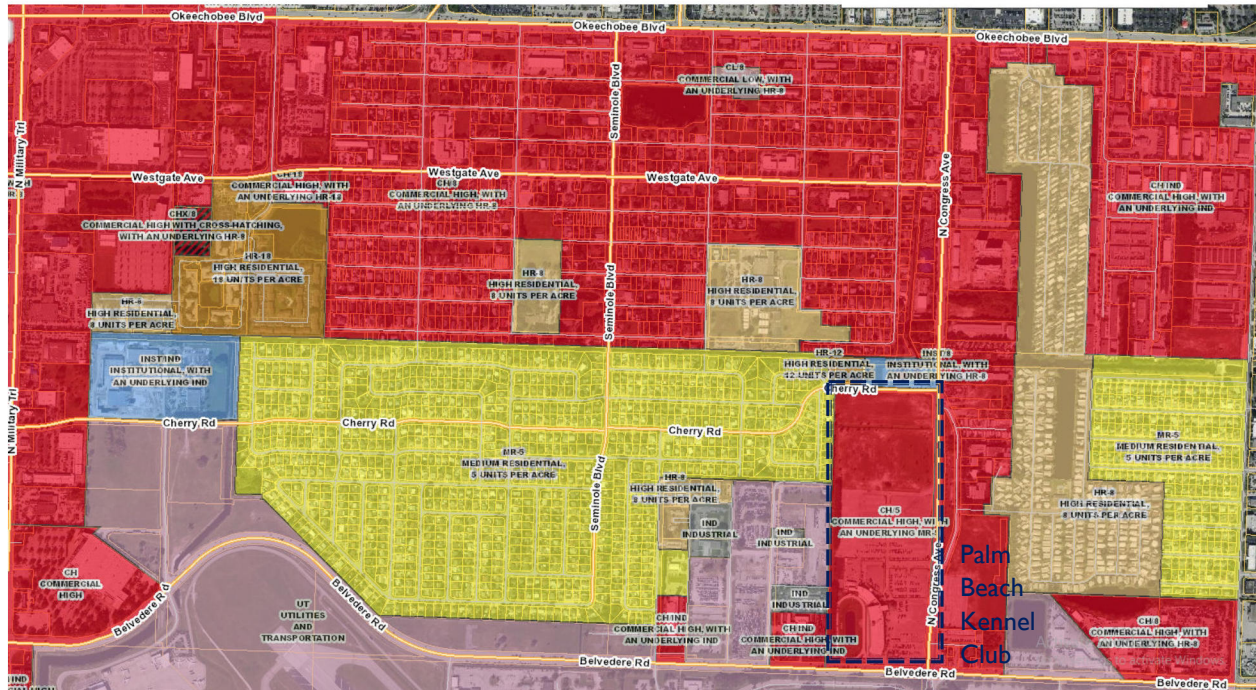


Figure 2. Future Land Use Map – WCRAO

The base density allowed by the future land use within the WCRAO, even when combined with other density bonus programs such as Transfer of Development Rights (TDR) and Workforce Housing Program (WHP) density incentives, is relatively too low to achieve urban infill redevelopment within the CRA District. The majority of the parcels in the WCRAO support a Commercial High (CH) future land use with an underlying residential future land use of 8 units per acre (see Figure 2). This low base density is inherent to the historic development pattern of unincorporated suburban Palm Beach County. Some higher density pockets of HR 12 and HR 18 do exist in the redevelopment area, along with MR-5 (5 units per acre) in single family neighborhoods, as well as Commercial Low (CL), Industrial (IND) and Institutional (INST) future land uses.

The WCRAO Density Bonus Pool serves as the established density bonus tool within the Westgate Area; others are available Countywide including the Workforce Housing Program (WHP), however, there are limitations. To achieve a density of 25 du/ac, all bonus density incentives within the WHP must be fully exhausted, often Transfer of Development Rights (TDRs) must be purchased and layered to base and bonus densities to realize the project units, and a future land use amendment is often still required to increase the base from MR-5 or HR-8 to HR-12 as the starting point in the entitlements process. The Board is beginning to approve greater densities within residential and mixed-use projects within the U/S Tier: Fount MUPD (Ord. 2022-013) on Okeechobee Blvd. was approved for 708 residential units on 27.66 acres. The application included a FLU amendment to increase the base density from 8 du/ac to 12 du/ac, and the purchase of 111 TDRs, to yield an overall project density of 25.6 du/ac. Combined with other approved developments over the past several years (Lennox North Beach-

-22.4 du/ac on 11.14 acres; R80 Residential—25 du/ac on 11.46 acres), these projects indicate a general inclination of the Board to approve densities greater than the base future land use.

Within the WCRAO, two constructed projects along Congress Avenue within the Urban General (UG) Sub-area serve as examples of how the Density Bonus Pool functions to increase density without the need for a Future Land Use Atlas amendment:

- Autumn Ridge (Control# 2020-0152) — CH/8 FLU, 106 units on 3.62 acres utilized 29 dwelling units from the FLU, and 77 units from the Pool to achieve an overall density of 29.3 du/ac. The project provides 100% affordable housing for seniors
- Brandon Estates (Control# 2016-00052) — CH/8 FLU, 198 units on 7.48 acres utilized 60 units from the FLU, and 138 units from the Pool to achieve an overall density of 26.4 du/ac. The project provides 60 workforce housing units.

The CRA proposes to utilize the base residential future land use, plus allowable bonus density to maximize overall residential density in underutilized areas to accommodate additional units in the community. However, maximizing density on existing developable land alone will not bring that much needed residents in the area because of continued constraints in the area. A vast amount of land within CRA district is County or Airport owned reducing the overall acreage available for redevelopment. One of the primary purposes of a Community Redevelopment Agency is to address the infrastructure needs that contribute to blight. The CRA District sits within the C-51 drainage basin requiring a percentage of a parcel to be set aside for stormwater storage, reducing buildable area.

These constraints, along with few vacant lots, lend themselves to scarcity of developable lands in the area. Retention projects have taken a greater percentage of available developable land. The C-51 rule requires as much as 30% of parcels to be set aside for on-site water retention leaving little left for actual development. To address this ongoing issue, the CRA has constructed a number of retention ponds in the North & South Westgate Estates neighborhoods. The CRA established a Stormwater Storage Mitigation Bank through South Florida Water Management District (SFWMD) that would enable developers to utilize “stormwater redevelopment credits” to meet their stormwater storage requirements. The mitigation bank utilizes the Central Lake, also known as the Dennis P. Koehler Preserve, a 6.85-acre retention lake completed by the CRA in collaboration with the County in 2012, for additional stormwater storage. To date, three major development projects on Congress Avenue, the lowest point of the C-51 basin, have utilized stormwater redevelopment credits, representing a substantial savings to development costs. The CRA continues to work with SFWMD to add more retention lake credits to the mitigation bank. The CRA District is unlike any other County-designated infill redevelopment area; the Agency has been working toward correcting level of service deficiencies in sidewalks, streetlights, sanitary sewer and stormwater storage since its creation through its TIF, combined with grants, without a cost burden to the County since its creation in 1989.

Addressing a Local Need for Housing Production: The Palm Beach County Housing Leadership Coalition 2023 Housing Action Plan outlined specific actions to “produce, rehabilitate and preserve 20,000 units of workforce and affordable housing by 2032.” (<https://www.hlcpbc.org/housing-plan-meetings-and-resources/>) The plan is based on the 2020 Palm Beach County Affordable Housing Needs Assessment, a quantitative and qualitative study that explored links between housing supply, affordability, and demand. The assessment examines growth and change in the local labor market, migration patterns post-pandemic, housing values, household income and composition, noting the need for urgent action to address housing affordability issues. Among actions recommended is an “immediate focus on rental housing preservation and production.” The Housing Action Plan states that “Palm Beach County has an affordable and workforce housing crisis”. A shortage of quality housing stock at all levels of affordability impacts business retention and attraction, overall economic growth, and

quality of life. The Plan further identifies areas of opportunity to correct the crisis through: funding and financing, planning and regulatory reform, neighborhood revitalization and community development, and racial equity.

The CRA's request to replenish and increase the Density Bonus Pool furthers the goals of the Housing Action Plan. One of the primary justifications for increasing residential bonus density is to promote housing for all income levels within the redevelopment area. The demand for housing, particularly affordable housing in urban areas is growing due to increasing populations, rising rents, and limited available land. By increasing residential bonus density, developers can be incentivized to provide more affordable units in the project, which directly contributes to addressing the County's housing shortage. The table below shows that the population growth within the CRA boundaries and within a 1-mile radius are outpacing overall population growth County-wide.

2024-2029 Population Growth Rate	
Area	Growth Rate
Westgate CRA District	1.53%
Westgate CRA District – 1-mile radius	1.32%
Zip code 33409 (West Palm Beach)	0.74%
Palm Beach County	0.47%
Florida	0.93%
USA	0.38%

Table 1. 2024-2029 Population Growth Rate

Source: ArcGIS Business Analyst data compiled by CRA Staff

Missing Middle Housing:

To facilitate future larger-scale redevelopment, well-designed “missing middle” developments can offer a lower density alternative along secondary corridors and transitional areas of the CRA District. Missing middle building types, such as two and three-story townhouses, fourplexes, courtyard buildings, or live/work projects provide a diversity of housing options and support locally-serving retail and public transportation options. The CRA has seen an increase in residential projects on less than one acre that utilize the WCRAO Density Bonus Pool to achieve an overall density of 15-18 du/acre. This highlights the flexibility of the Density Bonus Program to be utilized in a variety of residential projects, each contributing to new housing stock. With the Westgate Avenue streetscape project currently underway, the CRA anticipates more commercial redevelopment and rehabilitation will follow. “Missing Middle Housing helps solve the mismatch between the available U.S. housing stock and shifting demographics combined with the growing demand for walkability”. (<https://missingmiddlehousing.com/>) Opticos Design describes this type of housing as missing because it is typically not seen in either urban areas, where higher density multifamily is prevalent, or suburban neighborhoods, where single-family dominates. The form and scale of “missing middle” housing differs in number of units and affordability, both in construction and end-user rents. The WCRAO Density Bonus Pool allows for missing middle housing to occur on smaller infill sites that otherwise would be restricted by site size, and the underlying future land use.

Methodology of Request:

To implement the Westgate/Belvedere Homes Community Redevelopment Plan and FLUE Policy 1.2.3-b, Density Bonus Pool, areas within the CRA district with capacity for redevelopment, geographically represented by WCRAO sub-areas within the ULDC, are

allocated a maximum number of possible bonus units per acre (see Figure 3, below). Sub-areas that comprise arterial corridors such as Congress Avenue within the Urban General (UG) Sub-area, and Okeechobee Blvd. within the Urban Highway (UH) Sub-area are permitted a higher number of density bonus units per acre to encourage transit adjacent development. The Neighborhood Commercial (NC) Sub-area, the focal redevelopment corridor of the CRA District, is targeted for medium density mixed-use. Sub-areas in transitional zones, such as the Neighborhood General (NG) and the Neighborhood Residential – Medium Density (NRM), ideal for smaller scale mixed-use development and missing middle housing, are capped at a lesser number.

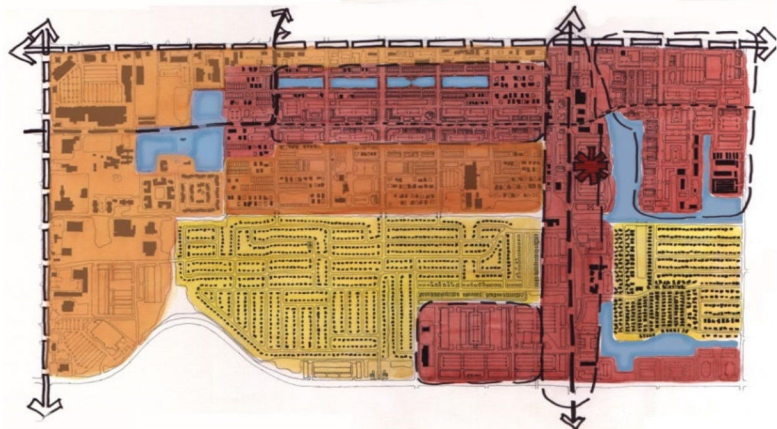
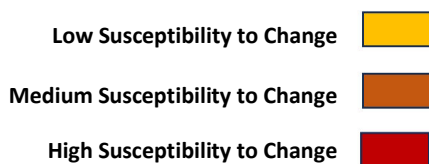
Table 3.B.14.H – WCRAO Density Bonus Pool Limits

Sub-areas	NR	NRM	NG	NC	UG	UH	UI
Max. WCRAO Density Bonus per ac.	N/A	20	30	50	150	150	N/A
[Ord. 2006-004] [Ord. 2021-006]							

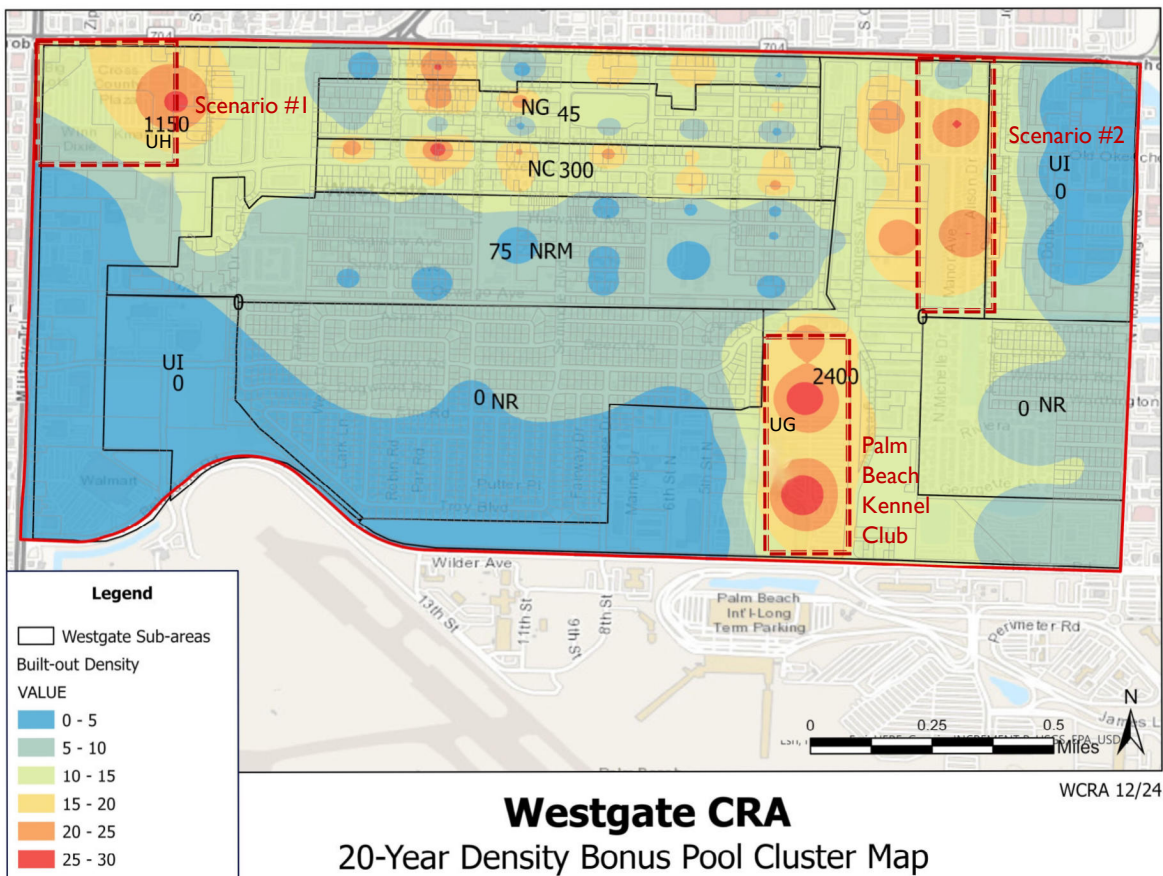
Figure 3. WCRAO Density Bonus Pool Limits

The build out analysis supporting this amendment request presupposes the preservation of single-family neighborhoods of Belvedere Homes and Belvedere Heights. These neighborhoods support an MR-5 FLU, and are not receiving areas for increased density. Redevelopment strategies within the single-family areas of the CRA District focus on affordable and workforce housing preservation and improvement, with reimbursable grant funding available to homeowners seeking to leverage investments to their property. Similarly, industrial zones with an IND FLU, are not assigned higher densities within those corresponding ULDC WCRAO Sub-areas.

**Figure 4. Conceptual
Redevelopment Outlook of the
Westgate Area – 2005
Redevelopment Plan**



The justification for the 2005 text amendment to the Density Bonus Program that increased the Pool to 1,300 units examined the potential for redevelopment within selected Transportation Analysis Zones (TAZ) to determine by block group the trajectory of a build out scenario where clustered housing is encouraged according to Community Redevelopment Plan (see Figure 4, previous page). At that time, the area had 6 TAZ; today the area has 21 TAZ. Build out modeling in 2005 was correlated to impact on roadways, represented by traffic trips. But using a TAZ framework as a development forecasting tool exclusively in a redevelopment area has limitations. The 2005 forecast was predicated on a redevelopment outlook that mirrors the current request, however, “susceptibility to change” density cluster areas have evolved slightly from 2005 text amendment.



Case studies supporting the request –

Figure 5. 2024 Density Bonus Receiving Areas “Heat” Map by WCRAO Sub-area

Source: Prepared by CRA Staff

The framework for modeling the build out scenario is based on a number of factors. The development outlook now considers transit-oriented, mixed-use development density clusters along Okeechobee Blvd., and within transitional areas between Okeechobee Blvd. and Westgate Avenue, as well as south of Westgate Avenue for missing middle housing. The analysis examined all non-residential uses within these clusters, block by block, for potential for conversion from non-residential uses (commercial, office, retail, industrial) to residential uses, and corresponding to 11 distinct TAZs within the CRA’s boundaries. See Figure 5 above for a heat map indicating projected density clusters highlighting areas in red and orange with a potential for 20-30 du/acre. The 2005 model excluded the redevelopment of the 47-acre Kennel Club property; the redevelopment program for the Westgate Village MUPD proposes 1,145 residential units. The CRA is requesting an increase of 3,000 units that would replenish and increase the existing pool of 1,300 units, with the remaining units to be allocated to various projects both large and small, across a 20-year build out horizon.

The WCRAO Sub-areas are fully established, and Density Bonus Pool limits determine the intensity of new residential redevelopment. To support the request for an additional 3,000 units, modelling is organized by density clusters corresponding to each WCRAO Sub-area, and the per acre bonus density limitations codified in the WCRAO. The analysis assumes a continued strong output of housing on underutilized and blighted land in the CRA district, over a 20-year long range forecast. Total build out is based on 8 units per acre as the highest by-right density allowed by the FLU, existing viable units, and the number of acres considered as “susceptible to redevelopment” based on potential for future redevelopment and historic trends. The table

below (Table 2) illustrates the number of units needed to accomplish housing development program.

15-20-Year Density Bonus Program - Multifamily Unit Projection								
WCRAO Sub-areas	UG	UI	NR	UH	NG	NC	NRM	Total
Total Multi-family Build Out	3604			2150	500	756	695	7705
Existing Multi-family Units	871			560	335	296	500	2562
Projected Multi-family Units	2733			1590	165	460	195	5143
Acres Susceptible to Redevelopment	80			55	15	20	15	185
FLU Base Density	8			8	8	8	8	8
By Right Units	640			440	120	160	120	1480
20-year Density Bonus Pool	2093			1150	45	300	75	3663
Less Remaining Units in Density Bonus Pool								623
Density Bonus Pool Increase Request								3040

Table 2. 15-20-Year Bonus Program – Multifamily Unit Projection

Source: Prepared by CRA staff

Projection Assumptions:

- Modeling estimates 3,040 density bonus units are needed in the Pool; request is for 3,000 additional units rounded down
- Total multi-family build out represents existing viable units, planned development, and potential housing stock in areas susceptible to redevelopment
- 8 units per acre is generally the highest density allowed by FLU in selected Sub-areas
- Projected multi-family units assumes high density redevelopment on larger underutilized sites, and incremental redevelopment in WCRAO Sub-areas targeted as receiving areas for Density Bonus
- Pool units are needed to make up the difference between what's allowed by right in the FLU, planned residential or mixed- use projects, and future residential build out based on the goals of the Redevelopment Plan

Modeling projects a total build out of 5,754 units within the Urban General (UG), and Urban Highway (UH) Sub-areas alone, which act as receiving areas for a majority of the bonus density requested. Within these density clusters located along Congress Avenue and Okeechobee Blvd. 135 acres are susceptible to redevelopment, and the redevelopment of three large +/-40-acre sites drive the forecast. 4,630 new multi-family units are projected, including 1,145 units planned for the Palm Beach Kennel Club site on Congress Avenue. An estimated 1,124 units are considered viable and remain as existing. If 135 acres are susceptible to redevelopment, by applying 8 du/ac as the base density, 1,080 units are permitted by the future land use in these Sub-areas. To close the gap, the difference between existing units and by right density and total future build out projections, a total of 3,243 Pool units are needed. The remaining 420 units that comprise the balance of the 20-year Density Bonus Pool are assigned to other priority

redevelopment areas for incremental residential redevelopment such as the Westgate Avenue corridor, and areas between Westgate Avenue and Okeechobee Blvd.

The redevelopment of three large +/-40-acre sites drive the forecast. 935 bonus units from the Pool are allocated for the redevelopment of 42 acres on the Palm Beach Kennel Club site on Congress Avenue in the UG-Sub-area to supplement 210 units allowed by the future land use; another 680 for the redevelopment of a 40-acre mobile home park site on Okeechobee Blvd. in the same Sub-area. An estimated 880 bonus units are projected for a key 40-acre redevelopment site at the intersection of Okeechobee Blvd. and Military Trail within the UH Sub-area. The anticipated need for bonus density to achieve the build out of these three sites is 2,495 units. The remaining 1,475 bonus units that comprise the balance of the 20-year Density Bonus Pool are assigned to these key cluster Sub-areas, and other priority redevelopment Sub-areas for incremental residential and mixed-use redevelopment.

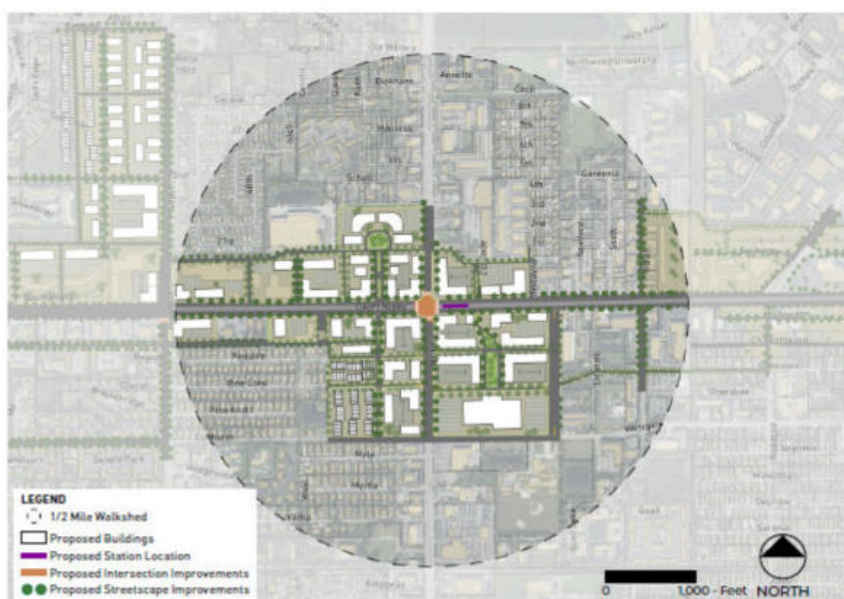
Urban Highway (UH) Sub-area Redevelopment Scenario #1:

- 55 acres of land with potential for redevelopment in the Sub-area
- Includes the +/- 40-acre Cross County Mall site at the intersection of Okeechobee Blvd. and N. Military Trail, and 15 acres of underutilized parcels Okeechobee Blvd. extending to Congress Avenue for TOD, and redevelopment opportunities on Donnell Road
- Cluster density area with projection of 1,590 new MF dwelling units over 20-year build out
- Assume less 440 units permitted by right through FLU to equal a bonus density of 1,150 units for the Sub-area

**Figure 6. Palm Beach TPA
Okeechobee Blvd. to SR-7
Multimodal Corridor Study –
Military Trail Station concept for
TOD vision**

Source:

<https://palmbeachtpa.org/wp-content/uploads/2022/12/Okeechobee-Blvd-SR-7-Multimodal-Corridor-Study-Full-Report-with-Appendices-1.pdf>



Potential Redevelopment Site – 40-acre MUPD at SE corner of N. Military Trail & Okeechobee Blvd.

- Prime location at the intersection of two major County arterial roadways
- Palm Beach TPA Okeechobee Blvd. & Multimodal Corridor Study – Land Use & Economic Development Report (November 2022) -- <https://palmbeachtpa.org/wp-content/uploads/2022/12/Okeechobee-Blvd-SR-7-Multimodal-Corridor-Study-Full-Report-with-Appendices-1.pdf> envisions a District/Town Center typology with a transit station at this intersection. The Study projects a little over 1,000 new housing units through residential infill redevelopment and the commercial redevelopment of big box

retailers within the transit station area. Transit oriented development at this location would support existing Palm Tran ridership routes and transfers along N. Military Trail.

- To achieve an overall density of 30 du/ac on the 40-acre MUPD site, 880 units would be needed from the Density Bonus Pool
- 8 du/ac or 320 units from the base, and 22 du/ac or 880 units from the DBP
- Leaving 270 DBP units for other redevelopment scenarios within the cluster area

Urban General (UG) Sub-area Redevelopment Scenario #2:

- Conservative estimate of 80 acres with potential for redevelopment in the Sub-area
- Includes the +/- 47-acre Palm Beach Kennel Club site at the intersection of Congress Avenue and Belvedere Road with a planned redevelopment project proposing 1,145 housing units on 42 acres with a CH/5 FLU; a 40-acre mobile home park on Okeechobee Blvd., as well as redevelopment opportunities on varying, smaller sites along Congress Avenue and Belvedere Road.
- Cluster density area with projection of 2,733 MF dwelling units over 20-year build out
- Assumes less 640 units permitted by right through FLU to equal a bonus density of 2,093 units for the Sub-area
- 935 units are allocated to the planned PBKC project

Potential Redevelopment Site – 40-acre mobile home park along Okeechobee Blvd. at Manor Ave.

- To achieve an overall density of 25 du/ac on the 40-acre mobile home park site, 680 units would be needed from the Density Bonus Pool
- 8 du/ac or 320 units from the base, and 17 du/ac or 680 units from the DBP
- Leaving density bonus for other redevelopment scenarios within the cluster area (considers 935 less from PBKC)

Community Input:

The CRA held a community meeting on November 19, 2024 to present the text amendment to increase the number of units available in the WCRAO Density Bonus Pool to key stakeholders. The meeting was attended by a diverse group representing residents, property and business owners, developers, industry stakeholders, and County Staff. 20 individuals responded to the survey during the meeting, with an additional 30 responses collected from residents and other stakeholders in the weeks following the meeting. The initiative is generally supported by the broader community; 90% responded in favor, with 10% opposed. A survey asked: “Do you support restocking housing units in the Density Bonus Program for future development?” Supporters highlighted its potential to boost redevelopment along major corridors, streamline housing development processes, and address the County’s housing shortage. They also saw it as an important step for beautifying and growing the Westgate CRA while increasing affordable housing options. Opponents raised concerns about the survey’s limited representation of the broader Westgate community. They felt the program might favor developers over existing residents and interior areas. Some also questioned whether increasing density would truly provide affordable housing for low-income residents.

TRAFFIC IMPACTS

The CRA engaged Kimley-Horn to analyze the potential traffic impacts of increasing the number of units available in the Density Bonus Program from 1,300 to 4,300 units.

The Traffic Impact Analysis, dated September 9, 2025, evaluated *“the impacts of trips generated by these additional units, ...(3,000 multifamily dwelling units (318 low-rise multifamily dwelling units and 2,682 mid-rise multifamily dwelling units) projected through a 2040 buildout horizon, consistent with the limit of the Palm Beach County’s Traffic Performance Standards (TPS) database’s maximum development horizon. It was assumed that one third (33%) of the existing commercial development within the areas identified “hot spots” for potential residential*

development would be redeveloped. There was approximately 900,000 square feet of existing commercial retail and of that credit was taken for existing traffic generated by 294,000 square feet of commercial space to be redeveloped. Additionally, it was assumed that approximately 10% of traffic generated by these additional residential units within the CRA would be considered as internal trips, meaning the trips generated by destinations within the CRA are assumed to remain within the WCRAO and not travel on the external road network. As a result, the proposed additional residential units are anticipated to generate 5,445 net new daily trips, including 840 AM peak hour trips, and 403 PM peak hour trips... A buildout year of 2040 was used for the purposes of this analysis, due to limitations of the Palm Beach County database when considering committed development data for approved, but unbuilt, projects forecasted to add project traffic on the road network.”

...“A comprehensive review of the County’s Five-Year Road Program and Long-Range Transportation Plan (LRTP) identified planned roadway improvements within the study area. Roadway segments significantly impacted by the proposed development were analyzed for future traffic conditions relative to their adopted Level of Service (LOS) D thresholds. A compounding annual growth rate of .49% was calculated for roadway links within the vicinity of the CRA ...(3-mile radius). The following roadway links are expected to exceed their adopted LOS D service volumes in the year 2040 without the addition of traffic resulting from the increase of residential units within the CRA:

- Palm Beach Lakes Blvd between Village Blvd and I-95 – AM: EB*
- Okeechobee Blvd between I-95 and Australian Ave – AM: EB, PM: WB*
- Military Trail between Westgate Ave and Belvedere Rd – PM: NB*
- Australian Ave between Palm Beach Lakes Blvd and Banyan Blvd – PM: SB*
- Australian Ave between Belvedere Rd and Southern Blvd – AM: SB*

None of the surrounding roadway links are expected to exceed their adopted LOS D service volumes in the year 2040 due to the addition of project traffic.”

TRAFFIC MITIGATION

CRA Mobility Plan Framework & Strategies:

To mitigate potential traffic impacts, and improve mobility across a 20-year build out horizon, the Westgate CRA has developed a Mobility Plan framework, with specific short, mid, and long-term strategies to address congestion on internal and adjacent roadways. The Agency’s mobility goals are to ensure responsible, sustainable growth; a safe, well-connected roadway network; and, solutions-oriented collaboration with County and State partners, and with the District’s closest jurisdictional neighbor, the City of West Palm Beach. The City’s downtown is less than one mile from the CRA’s N. Florida Mango Rd. eastern boundary, connected by both Okeechobee Blvd. and Old Okeechobee Rd. There is an opportunity to collaborate with the City on joint feasibility studies, connected mobility plans, and aligned land use policies and regulations.

The mobility strategies proposed address the impacts of adding 3,000 more units within the Westgate Community Redevelopment Area focusing on ensuring that traffic flow and roadway capacity are effectively managed throughout the 20-year build-out projection. Traffic management strategies for addressing increased density within the Westgate CRA focus on enhancing transportation options and reducing the reliance on automobiles, in line with the goals outlined in the CRA Plan for transportation and roadway improvements. Ongoing partnerships and coordination with the Westgate business and resident community, Palm Beach Transportation Planning Agency (TPA), Palm Tran, Palm Beach International Airport, the County’s Traffic Division, the City of West Palm Beach, and private developers will ultimately guide the implementation of strategies to improve mobility within the area. A CRA Community Meeting is planned for October 2025 to present the Agency’s mobility framework and strategies for input by residents and stakeholders. Input from the meeting, along with ongoing coordination

with the County through the CMTF process will inform the creation of a Westgate CRA Mobility Plan.

The CRA's approach for implementing mobility strategies is to support redevelopment within density clusters, implementing strategies to mitigate traffic that begin with short-term cost-feasible projects and programs that increase in intensity, scope and cost, aligned with redevelopment pace, traffic congestion triggers, Countywide Master Transportation Plan priority projects, and planned mobility projects and programs within the City of West Palm Beach. Long-term "dream big" mobility projects will require interjurisdictional coordination and layered funding sources. Florida State Statutes restrict CRA spending to within its boundaries; partnerships are necessary for projects and programs with a scope that extend beyond the CRA's ability to participate.

The internalization of trips is a key strategy. This can be achieved through the implementation of traffic management strategies, and other initiatives aimed at reducing the strain on external roadways, such as mixed-use development. Each development that utilizes bonus density from the WCRAO Density Bonus Pool will be required to assess its traffic impact as part of the County transportation concurrency process; projects have the ability to utilize the remaining trips from the Westgate TCEA pool of trips with CRA concurrence. This ensures that the cumulative effects of development are addressed in the most efficient way as per ULDC and Statutory requirements.

In the FY26, the Westgate CRA committed +/- \$1,005,000 in Annual Budget allocations to begin the implementation of mobility strategies. The Annual Budget was approved by the Board of County Commissioners in September 2025.

\$450,000	'Public Transportation' – initiation of TDM Program & Microtransit (Circuit) Pilot launch
\$550,000	'Technical Assistance & Engineering/Construction Coordination – mobility and long-range planning, engineering feasibility, design, implementation
\$1,005,000	Total fiscal year investment

Traffic Demand Management:

A primary mitigation strategy is to encourage the use of alternative modes of transportation through Traffic Demand Management. This includes CRA incentives that may be offered to larger existing and new multifamily developments, and to larger employers for carpooling, vanpooling, the use of scooters and e-bikes. The CRA joined the WPBgo Mobility Coalition in July 2025 as a partner in mobility. The Coalition is a non-profit public-private partnership of community leaders addressing the challenge of reducing traffic impacts and improving mobility in and around downtown West Palm Beach enabling economic growth and reducing commute times. Based on data from Kimley-Horn's Traffic Impact Analysis nearly 20% traffic trips exit the CRA and use Okeechobee Blvd. eastbound to I-95, and Australian Ave., and to downtown WPB, and beyond to the island of Palm Beach. Given the CRA's centralized location and its emphasis on infill redevelopment, the area offers a significant opportunity to reduce vehicle dependence. 2024 ACS commuter transportation mode data for the CRA District shows that approximately 15% already carpool, and 4% use public transit. Almost 28% commute in 15 minutes and under. Planning for the introduction of a microtransit on-demand ride-share service for CRA residents to move within internal destinations such as Walmart, Cross County Mall, and Palm Beach Marketplace is underway. The CRA has had preliminary discussions with Circuit to initiate a pilot on-demand service within Westgate; it is anticipated that a pilot program will launch in Q1 of FY26.

Public Transportation:

Public transit improvements will also play a critical role. Enhanced transit stops along Congress Avenue are planned, with efforts to address gaps in public transportation coverage. Ongoing collaboration with Palm Tran is focused on expanding transit service, especially in density target areas to improve connectivity and service availability. Existing Palm Tran routes, including Routes 3, 40, 43, and 44, provide essential service within the CRA, but there are opportunities for expansion and improvement. Route 3, for example, serves Military Trail, with a major stop at the Cross County Plaza. Route 40, which connects the Intermodal Transit Center to Belle Glade, stops at Okeechobee and Congress Avenue, while Route 44 offers flexibility with a loop through the middle of the CRA, providing access to various local streets and connections to the airport. Route 43, Palm Tran's most used route, serves Okeechobee Boulevard east-west, providing easy transfers at key intersections. In September 2024 Palm Tran launched "The Wave" on Route 43, a daily 15-minute "light BRT" express, and introduced a plan to implement transit signal prioritization, which will help improve service efficiency, particularly during peak hours. The CRA will collaborate with Palm Tran in the short-term to improve bus stops and shelters along strong ridership routes, particularly along Okeechobee Blvd. Palm Tran coordination will continue into the mid-term through a program to increase frequency and reduce headways on Route #44 which serves Congress Avenue and PBIA.

Park-and-Ride Facilities:

The CRA will develop a program for utilizing existing and new larger-scale development for temporary and permanent Park-and-Ride facilities at surface parked sides with shared tenant parking to intercept single-occupant vehicles before they load constrained east-west corridors, especially Okeechobee Boulevard. This strategy also provides an opportunity for transfers to Palm Tran routes, on-demand microtransit, and future higher-capacity transit hubs and nodes. These facilities would serve both Westgate residents, and commuters traveling from farther west. Potential Park-and-Ride locations include Cross County Mall, Walmart Plaza, and Westgate Village. As redevelopment accelerates temporary surface parked Park-and-Ride facilities are projected to become more permanent facilities, available within parking structures.

CRA Mobility Infrastructure Projects Completed, Under Construction & Planned:

The CRA has a continuing program through the Community Redevelopment Plan to implement streetscape improvements and complete streets projects on key roadways within the District to facilitate redevelopment.

Through a partnership with the County, the Palm Beach Transportation Agency (TPA) and FDOT District 4, the CRA completed two pedestrian improvements projects in the Belvedere Heights neighborhood that facilitate walkability. Streetscape projects have been completed on Seminole Blvd., a main north-south connector, adding 10 ft. multi-use paths and pedestrian lighting. The Westgate Avenue project, substantially completed in March 2025, represents a major investment by the CRA, acting as both a capital improvements project and an economic development driver. The project reduced travel lanes from 5 lanes to three, added 6 ft. bike lanes, ADA-compliant crosswalks, street trees, pedestrian lighting, and on-street parking where available. This project on the CRA's focal redevelopment corridor is anticipated to help reduce vehicular traffic by encouraging the use of alternative modes of transportation, walkability, and mixed-use development for trip internalization. A pedestrian improvement project on Cherry Road between Quail Drive and N. Military Trail is the final planned TPA-funded project, and is currently under construction adding sidewalk connectivity, a 10 ft. multiuse path, pedestrian-scale streetlights, and improved crosswalks.

Within the short and mid-term, the CRA will continue a program of sidewalk and bike-lane improvements to local roadways including Cherry Rd. (Quail Dr. to Seminole Blvd.), Wabasso Dr. (Okeechobee Blvd. to Westgate Ave.), and N. Florida Mango Rd. (Belvedere Rd. to Old

Okeechobee Rd./Okeechobee Blvd.), Congress Avenue (Okeechobee Blvd. to Belvedere Rd.), and Congress Avenue (Belvedere Rd. to Okeechobee Blvd.).

In the long-term, through public and private partnerships and funding, the CRA will collaborate to implement transit hubs or nodes at key redevelopment sites within the UH and UG Sub-area density clusters (Cross County Mall, Westgate Village/Old Congress Ave. PBC-owned 'sliver'). To address future congestion points that may result from additional residential density, the CRA will partner with the County to complete intersection improvements as necessary based on redevelopment pace. The 95th Percentile Queueing Analysis provided within Kimley-Horn's Traffic Impact Analysis identifies two intersections that are *"expected to increase the queue beyond the available storage in the year 2040"*:

- Okeechobee Blvd. & Congress Avenue (westbound left turn lane due to increase in PM peak hour trips), and,
- Belvedere Rd. & Congress Avenue (southbound left turn lane due to increase in AM peak hour trips)

L-2 Canal Connector Project:

Prior to 2002 Westgate Avenue, a designated Urban Collector roadway, was two lanes; the roadway was expanded by the County as a capital improvements project with the intent that it would act as a reliever for traffic congestion along Okeechobee Blvd. at Palm Beach Lakes and the I-95 interchange. On the County's Transportation Improvement Map (TIM) at that time, ultimately, Westgate Avenue would be phased into an eastward extension, crossing Congress Avenue to Old Okeechobee Road with future access to Australian Avenue and downtown West Palm Beach. This extension project no longer exists on the County's TIM. Engineering and cost viability was prohibitive as it would have required the taking of land across an existing commercial MUPD, mobile home park, and industrial buildings to reach Old Okeechobee Road. In 2025, the Westgate Avenue Streetscape Project reduced the roadway to 3 lanes. An alternative reliever route could be the construction of connector road, shuttle route, or wide multi-use path by culverting the Palm Beach County-owned L-2 Canal segment between Congress Avenue and N. Florida Mango Rd. with the future goal of connecting to Australian Ave., Centerpark Dr., or Mercer Avenue, and beyond. Preliminary engineering and cost feasibility for this potential project is currently underway by the CRA. This potential long-term 'dream big' project would only be possible through interjurisdictional support and layer funding sources.

MOBILITY & TRAFFIC MITIGATION STRATEGIES (DRAFT)

Short Term (≥ 5 years):



Launch of on-demand service pilot CRA-wide connecting residential areas to #43 bus stop EB near PB Marketplace, and inter-CRA destinations (Walmart, Adult Ed. facility, etc.)



Palm Tran collaboration to improve bus stops and shelters along strong ridership routes



Continued sidewalk/bike lane improvements – Cherry Rd., Wabasso Drive. & N. Florida Mango Rd.



TDM programming – CRA-wide existing and new multifamily, larger employers (Kennel Club, County facilities, schools, auto uses)



Potential temporary Park & Ride locations—shared tenant parking – Cross County Mall, Walmart Plaza, Kennel Club

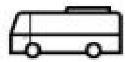


DWPB + Westgate connections 'Feasibility Study'

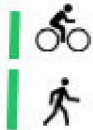


Land development codes – TOD/TOC design, parking reforms/reductions

Mid Term (5-10 years):



Increased Palm Tran frequency and reduced headways for important links – #44 (Congress Ave., PBIA)



Continued sidewalk/bike lane improvements – Congress Avenue, Belvedere Rd.



Ongoing improvements to connections to Intermodal Station/PBIA



Potential temporary Park & Ride locations–shared tenant parking – Cross County Mall, Walmart Plaza

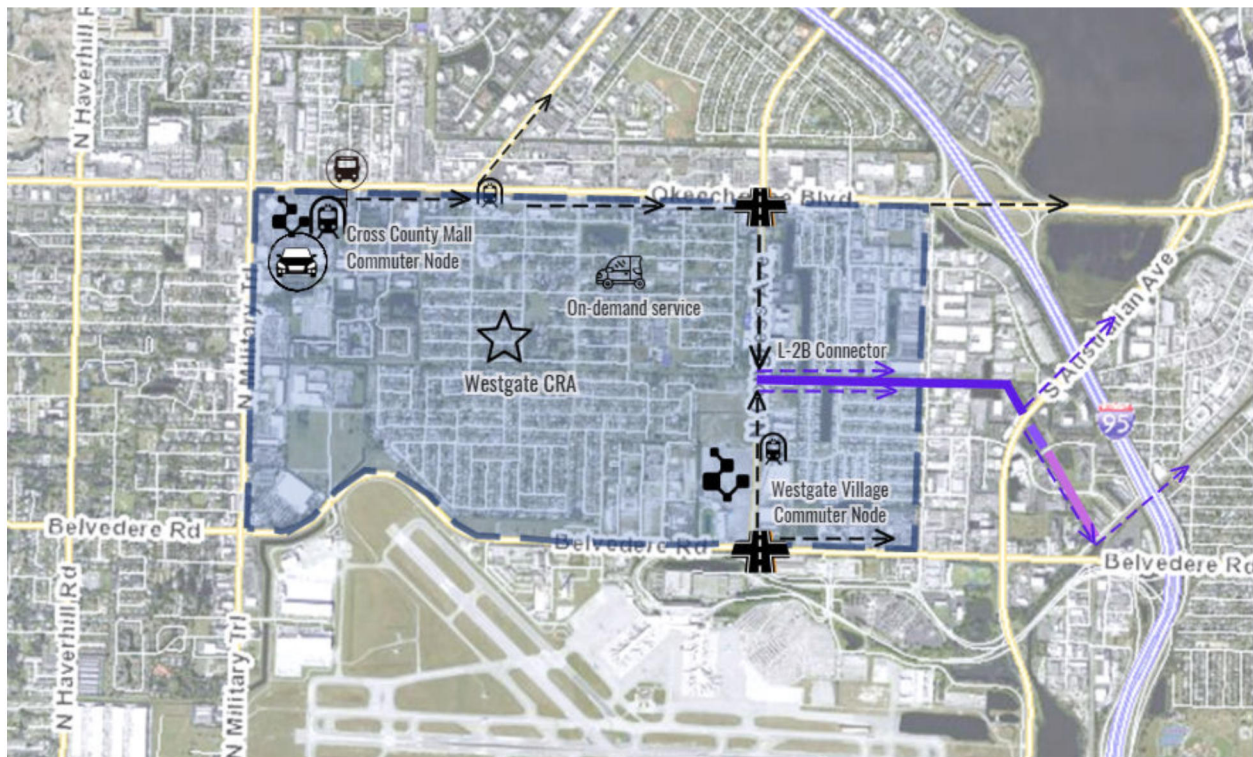


Ongoing TDM programming and on-demand service– CRA-wide



Potential 'Westgate Village' commuter node

Long Term (10-15 years+):



Potential transit hub locations - Cross County Mall Commuter Node (integrated Park & Ride), Wabasso Dr. at Okeechobee Blvd., Old Congress Ave. 'sliver'



'Dream Big' project: create Okeechobee Blvd. reliever road by culverting PBC-owned L-2 canal segment – connect to Australian Ave., Centerpark Dr., Mercer Ave.



Ongoing TDM programming and on-demand service – CRA-wide



Intersection improvements in partnership with PBC:

- Okeechobee Blvd. & Congress Ave. (WBL turn lane)
- Belvedere Rd. & Congress Ave. (SBL turn lane)

Conclusion:

The WCRAO Density Bonus Pool creates a competitive advantage for the redevelopment area, making it more attractive to potential developers. In areas where land is scarce or costly, developers need sufficient incentives to invest in projects that might otherwise be financially challenging. The increased density allows for more units to be developed, improving the economic feasibility of a project. This, in turn, makes the area more competitive compared to others without such incentives, encouraging private investment and accelerating the redevelopment process.

The request proposed by the CRA is in support of County 'housing for all' goals, the goals and objectives of the CRA's Community Redevelopment Plan, and regional and state efforts to encourage urban infill redevelopment in centralized areas. The proposed additional density bonus pool units allow higher land use intensity and density resulting in a stronger output of housing units than allowed by the existing future land use. Implementation of traffic mitigation and mobility strategies will support the 20-year build out projection. The additional units will contribute to providing much needed housing stock for the County's growing population.

Exhibit 3

Community Survey Summary provided by Westgate CRA



COMMUNITY SURVEY SUMMARY

Community Meeting Date: November 19, 2024, at 5:30 PM.

Key Agenda: Discussing the Density Bonus Program – Comp Plan Amendment to add 3,000 housing units to the pool.

On November 19, 2024, the CRA hosted a community meeting to discuss several topics, including the Density Bonus Program. The meeting was well-attended, with approximately 20 participants representing a diverse group of stakeholders, including residents, property owners, developers, industry professionals, business owners, a current and former County Commissioner, and CRA and County staff.

During the meeting, the CRA presented information about the Density Bonus Program and then distributed a survey to gather community input. The survey included the following question, accompanied by a blank space for participants to provide additional comments or concerns:

“Do you support restocking housing units in the Density Bonus Program for future development?”

Following the meeting, the CRA received 10 additional survey responses, bringing the total to 30 responses.

The survey results are summarized below, including numerical responses and the most significant comments from participants who supported or opposed the proposal.

It is important to note that the breakdown of responses by stakeholder type does not add up to 30, as many participants identified as being multiple stakeholder types (e.g., both a resident and a business owner).

Survey Results Overview

Response	Total	Breakdown by Stakeholder Type
Yes	25	- Resident: 10 - Property Owner/Developer: 8 - Industry Stakeholder: 4 - Business Owner/Operator: 7 - Other*: 6
No	5	- Resident: 5 - Property Owner/Developer: 0 - Industry Stakeholder: 0 - Business Owner/Operator: 0 - Other: 0

* Former BCC commissioner, CRA staff, planner, former employee, PBC planner, County staff.

1280 N. Congress Avenue, Suite 215
West Palm Beach, Florida 33409
561-640-8181
westgatecra.org



Based on the results, it is notable that **83.33% of the total responses are supportive** of adding 3,000 more bonus units in the Density Bonus Program, while only **16.66% were opposed**.

The survey's comments present both support and opposition to the proposal to restock housing units in the Density Bonus Program. Supporters highlighted its potential to boost redevelopment along major corridors, streamline housing development processes, and address Palm Beach County's housing shortage. They also saw it as an important step for beautifying and growing the Westgate CRA while increasing affordable housing options.

Opponents raised concerns about the survey's limited representation of the broader Westgate community. They felt the program might favor developers over existing residents and interior areas. Some also questioned whether increasing density would truly provide affordable housing for low-income residents.

Supportive Feedback Key Comments:

- "The replenishment will set the stage for future development, especially along major corridors."
- "Restocking housing units will greatly assist the beautification and redevelopment of WCRA."
- "I see a lot of people struggling and being put out on the streets because they can't afford the rents. The low-income people could use all the help that can be provided."

Opposing Responses Key Comments:

- "This seems to support developers only, leaving Westgate's interior behind."
- "We need more workforce and affordable housing options before increasing density."
- "We are overpopulated already."

Conclusion:

The results of this survey indicate an overall support for adding 3,000 new units to the Density Bonus Program, with the majority recognizing its potential to address housing shortages and foster redevelopment in the Westgate CRA. However, the feedback also emphasizes the need to address concerns surrounding affordability. The CRA believes this proposal will help tackle both housing availability and affordability—not only by increasing the number of workforce housing units through the program but also by enhancing market supply, which can help drive down overall housing costs.

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Exhibit 4A

Traffic Statement provided by Westgate CRA (dated 12/17/24)

PTC

Transportation Consultants

601 Heritage Drive, Suite 493
Jupiter, FL 33458
(561) 296-9698

December 17, 2024

Ms. Denise Pennell, FRA-RA
Director of Planning & Development
Westgate CRA, Palm Beach County
1280 N. Congress Avenue, suite 215
West Palm Beach, FL 33409

**Re: Westgate CRA Text Amendment - #PTC24-104
Traffic Statement**

Dear Ms. Pennell:

The purpose of this letter is to provide a traffic statement for the proposed text amendment to increase the density pool of bonus units by 3,000 potential residential units within the Westgate CRA. The build out of residential development utilizing the WCRAO Density Bonus Pool assumes a long-range 20-year forecast. The proposed increase in the number of bonus units supports the CRA's goals to revitalize the area and encourage higher densities to provide housing for a growing population.

A Transportation Concurrence Exception Area (TCEA) was adopted for the Westgate CRA. Any proposed development within the Westgate CRA not utilizing the TCEA pool of trips must meet transportation concurrency. Each new residential development will submit their own traffic analysis demonstrating compliance with the Palm Beach County Traffic Performance Standards. These additional units will be developed as separate residential or mixed-use projects in areas targeted for higher density within the CRA over time and will be required to address concurrency individually through use of various tools:

- Using the TCEA pool of trips.
- Demonstrating the project's insignificant traffic impact.
- Demonstrating the project's ability to meet level of service standards.
- Payment of proportionate share contributions for improvements.
- Demonstrating that "transportation deficiencies" are due to background traffic per Florida Statutes 163.3180.

Transportation mitigation strategies will also be developed within the CRA to address any increase in traffic. These could include transit improvements, bicycle and pedestrian improvements, intersection turn lane improvements and ride sharing and technology improvements that minimize vehicles on the road.

Please contact me by phone or at mulcahy@pindertroutman.com if you need any additional information or have any questions.

Sincerely,



Rebecca J. Mulcahy, P.E.
Vice President

Digitally signed by
Rebecca Mulcahy
Date: 2024.12.17
15:43:18 -05'00'

Rebecca J. Mulcahy, State of Florida, Professional Engineer, License No. 42570

This item has been electronically signed and sealed by Rebecca J. Mulcahy, P.E. on 12/17/24 using a Digital Signature. Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.

Traffic Statement 24-104 12-17-24.docx

Pinder Troutman Consulting, Inc.

Exhibit 4B

Traffic Impact Analysis provided by Westgate CRA (dated 9/10/25)

The full Traffic Impact Analysis is available upon request. Below is the Executive Summary.

Traffic Impact Analysis

Kimley»Horn

EXECUTIVE SUMMARY

Kimley-Horn and Associates, Inc. was retained to evaluate the traffic impacts of increasing the density bonus pool from 1,300 to 4,300 units within the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO). In 1988, the WCRAO was established in the Comprehensive Plan to encourage development and redevelopment with special land use provisions designed to arrest deterioration of property values and preserve affordable housing. The CRA was created the following year, in 1989, by the Palm Beach County Board of County Commissioners (BCC) pursuant to the Community Redevelopment Act, F.S. Chapter 163, Part III, as a dependent special district for the redevelopment of the area. This increase is intended to facilitate anticipated redevelopment at key sites within the WCRAO, including the Palm Beach Kennel Club, Cross County Plaza, and the Lakeside mobile home park and could potentially include an additional 3,000 multifamily dwelling units within the WCRAO. It should be noted that forecasting traffic volumes 15 years into the future can be used to identify general trends and potential issues that may occur, but poses limitations in identifying specific mitigation measures due to the nature of forecasting growth over a 15-year horizon.

This traffic impact analysis evaluates the impacts of trips generated by these additional units, projected through a 2040 buildout horizon, consistent with the limit of the Palm Beach County's Traffic Performance Standards (TPS) database's maximum development horizon. It was assumed that one third (33%) of the existing commercial development within the areas identified "hot spots" for potential residential development would be redeveloped. There are approximately 900,000 square feet of existing commercial retail use in those areas, and of that total, credit was taken for existing traffic generated by 294,000 square feet of commercial space to be redeveloped. Additionally, it was assumed that approximately 10% of traffic generated by these additional residential units within the CRA would be considered as internal trips, meaning the trips generated by destinations within the CRA are assumed to remain within the WCRAO and not travel on the road network external to the CRA boundary. As a result, the proposed additional residential units are anticipated to generate 5,445 net new daily trips, including 840 AM peak hour trips, and 403 PM peak hour trips external to the CRA boundary.

A comprehensive review of the County's Five-Year Road Program and Long-Range Transportation Plan (LRTP) identified planned roadway improvements within the study area. Roadway segments significantly impacted by the proposed development were analyzed for future traffic conditions relative to their adopted Level of Service (LOS) D thresholds. A compounding annual growth rate of 0.49% was calculated for roadway links within the vicinity of the CRA. The following roadway links are expected to exceed their adopted LOS D service volumes in the year 2040 without the addition of traffic resulting from the increase of residential units within the CRA:

- Palm Beach Lakes Blvd between Village Blvd and I-95 – AM: EB
- Okeechobee Blvd between I-95 and Australian Ave – AM: EB, PM: WB
- Military Trail between Westgate Ave and Belvedere Rd – PM: NB
- Australian Ave between Palm Beach Lakes Blvd and Banyan Blvd – PM: SB
- Australian Ave between Belvedere Rd and Southern Blvd – AM: SB

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According to Florida State Statute 163.3180, because all of these facilities identified will exceed their respective LOS D service volume threshold under background conditions, no proportionate share would be assessed for improvements to eliminate these deficiencies.

None of the surrounding roadway links are expected to exceed their adopted LOS D service volumes in the year 2040 due solely to the addition of traffic generated by the proposed additional development.

To support redevelopment while minimizing congestion, it is necessary for the Westgate CRA to prioritize strategic investments in multimodal infrastructure - enhancing and encouraging transit service, bicycle and pedestrian facilities, and connectivity throughout the WCRAO and to key destinations within Palm Beach County to alleviate the impact of vehicle trips on the County Road network. It is anticipated that most project trips are expected to utilize Okeechobee Boulevard, Belvedere Road, Palm Beach Lakes Boulevard, Australia Avenue, Haverhill Road, and Military Trail. Several bus routes already operate within the vicinity of the CRA and provide service along these roadway links, helping to alleviate traffic volumes. A review of pedestrian connectivity within the CRA was conducted and several pedestrian paths were identified to further improve connectivity. Establishing transit hubs stations where multiple bus routes intersect could further enhance mobility by improving access to different destinations and promoting public transportation.

Exhibit 4C

Traffic Division Review of Kimley Horn 9/10/25 Traffic Report (dated 9/23/25)

Westgate CRA (WCRA) – Adding 3,000 Units to the Density Bonus Pool Traffic Impacts

Traffic Impacts

At the request of the County and the WCRA, Kimley-Horn and Associates, Inc. evaluated the impact of increasing the density bonus pool from the currently approved 1,300 units to 4,300 units (increase of 3,000 units) within the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO). This evaluation, done in the form of a Transportation Concurrency Analysis, was documented in a report dated September 10, 2025.

It was estimated that about 294,000 square feet of existing commercial space has the potential to redevelop as residential. In traffic impacts perspective, this essentially means once redeveloped, trips generated by that commercial space will go away and replaced by new trips from the redeveloped residential land use in its place. This creates a trip credit bank for trip generation purposes. It was also assumed that 10% of trips generated by the new residential developments will be internal, meaning those trips will stay inside the WCRAO and not travel outside the boundary of the overlay. With all the above assumptions, addition of 3,000 multi-family dwelling units will add 5,445 net daily trips, 840 net AM peak hour trips, and 403 net PM peak hour trips.

In projecting traffic for the 2040 horizon year, background growth in traffic was estimated using trips from approved, but unbuilt projects from the County's Traffic Performance Standards (TPS) database and a nominal growth rate. In addition, trips from balance of existing Bonus Density Pool were also added.

Major roadway links and intersections within the radius of development influence were evaluated. From the analysis it was found that the addition of the 3,000 dwelling units in the WCRA will not cause any additional roadway and intersection failures beyond those that would have failed regardless of those unit additions. Following is the list of roadway links that will fail in 2040 (in other words will exceed the adopted Level of Service D service volume):

- Palm Beach Lakes Blvd between Village Blvd and I-95
- Okeechobee Blvd between I-95 and Australian Ave
- Military Trail between Westgate Ave and Belvedere Rd
- Australian Ave between Palm Beach Lakes Blvd and Banyan Blvd
- Australian Ave between Belvedere Rd and Southern Blvd

Any roadway improvements necessary to bring them up to the adopted LOS standard will also accommodate the additional traffic from these unit additions. It should be noted that as per the State Statutes, the developer will not be responsible for bringing the above background failed roadways up to the adopted LOS. None of the other surrounding roadway links is expected to fail in 2040 due to the addition of these units.

Similarly, all but one of the 9 intersections analyzed will fail to meet adopted LOS in the background conditions in 2040. Addition of 3,000 dwelling units will cause minor increase in delays to all of those intersections, however. Again, as per the State Statutes, the developer will not be responsible for bringing the above background failed intersections up to the adopted LOS. A summary of intersection analysis results is provided below.

Intersection	AM		PM	
	2040 Background	2040 Total	2040 Background	2040 Total
	Delay/LOS	Delay/LOS	Delay/LOS	Delay/LOS
Okeechobee Blvd and Haverhill Rd	99.7/F	100.9/F	135.1/F	136.5/F
Okeechobee Blvd and Military Trail	91.2/F	95.1/F	117.9/F	119.1/F
Okeechobee Blvd and PBeach Lakes Blvd	66.1/E	77.8/E	194.2/F	197/F
Okeechobee Blvd and Congress Ave	51.5/D	54.2/D	73.1/E	75.6/E
Westgate Ave and Military Trail	39.6/D	41.5/D	61.3/E	63.2/E
Westgate Ave and Congress Ave	18.9/B	19.1/B	28.4/C	30.9/C
Belvedere Rd and Haverhill Rd	62.6/E	65.1/E	159.3/F	159/F
Belvedere Rd and Military Trail	123.5/F	124.8/F	169/F	174.5/F
Belvedere Rd and Congress Ave	42.2/D	45.5/D	209.7/F	210.6/F

Mitigation

To mitigate traffic impacts of the requested increase of dwelling units in the Bonus Pool, Westgate CRA has created a Mobility Plan Framework and Strategies. These strategies are divided into Short Term (5 years or less), Mid Term (6 to 10 Years), and Long Term (11 to 15+ years). In general, these strategies consist of launching of CRA wide on-demand service pilot program connecting to transit stops and major destinations in the area, collaborating with Palm Tran to improve bus stops/shelters along strong ridership routes, sidewalk/bike lane improvements, TDM measures involving multi-family and larger employers, creating Park and Ride locations, coordinating with the City of West Palm Beach and other entities for feasibility of mobility improvements., e.g., to/from the Airport, increase frequency of buses, creating potential commuter nodes and transit hubs within the CRA, and exploring feasibility of creating Okeechobee Blvd reliever facilities.

Exhibit 5
Correspondence

Exhibit 6
Business Impact Estimate

BUSINESS IMPACT ESTIMATE

Meeting Date: 11/5/25 – BCC Comprehensive Plan Hearing

Proposed Ordinance Title/Reference: THE FUTURE LAND USE ELEMENT (TO INCREASE THE BONUS DENSITY POOL UNITS FOR THE **WESTGATE/BELVEDERE HOMES COMMUNITY REDEVELOPMENT AREA OVERLAY** FROM 1,300 TO 4,300 UNITS)

Summary of Proposed Ordinance and Statement of Public Purpose to be Served:

This County proposed text amendment is requested by the WCRA to increase the number of units available in the Westgate/Belvedere Homes Community Redevelopment Area Overlay (WCRAO) Density Bonus Pool. The pool units are used to increase residential density in the WCRAO, reducing the need for Future Land Use amendments and thereby expediting redevelopment. The current allotment of 1,300 units does not reflect the current development outlook, which now considers transit-oriented, mixed-use development density clusters along Okeechobee Boulevard, and within transitional areas between Okeechobee Boulevard and Westgate Avenue, as well additional housing south of Westgate Avenue. These clusters would include the potential redevelopment of several large sites, including the 47-acre Palm Beach Kennel Club, which is currently contemplating a project with 1,200 residential units. The proposed amendment would increase the number of bonus units available in the WCRAO Density Bonus Pool for a total of 4,300, to support these projects and Agency's next 20-year planning horizon, and assist in addressing the ongoing need for housing production countywide.

Estimate of Direct Economic Impact on Private/For Profit Businesses:

- a. Estimate of Direct Business Compliance Costs: There are no business compliance costs associated with this amendment.
- b. New Charges/Fees on Businesses Impacted: There are no new charges or fees associated with this amendment.
- c. Estimate of Regulatory Costs: This amendment will not impose any regulatory fees

Good Faith Estimate of Number of Businesses Likely Impacted: No businesses are expected to be impacted.

Any Additional Information: None.

Exhibit 7

Westgate CRA Mobility Plan Framework & Strategies (dated 9/15/25)



WESTGATE CRA

MOBILITY PLAN FRAMEWORK & STRATEGIES

Westgate  CRA PALM BEACH COUNTY
Westgate/Belvedere Homes Community Redevelopment Agency



September 15, 2025

WESTGATE CRA

Our History

- North & South Westgate Estates platted in 1921, one of the oldest subdivisions in PBC
- **'Western gateway' to City of West Palm Beach**
- De-annexed in 1930's following the Great Depression due to infrastructure challenges (C51 basin) - area has remained unincorporated since
- CRA created in 1989 by BCC to correct infrastructure deficiencies and encourage investment - only CRA in unincorporated PBC
- 1,300 ac or 2 sq miles
- Bounded by Okeechobee Blvd. to north, N. Florida Mango Rd. to east, Belvedere Rd. to south & N. Military Trail to west

Westgate by the Numbers (ACS 2024)

- 11,540 population
- 63% Hispanic
- 35.75 median age = **workforce population**
- \$63,409 MFI
- 3,479 households
- 49.5% renter occupied



DENSITY BONUS INITIATIVE

Westgate 2040 Residential Build-Out Projections

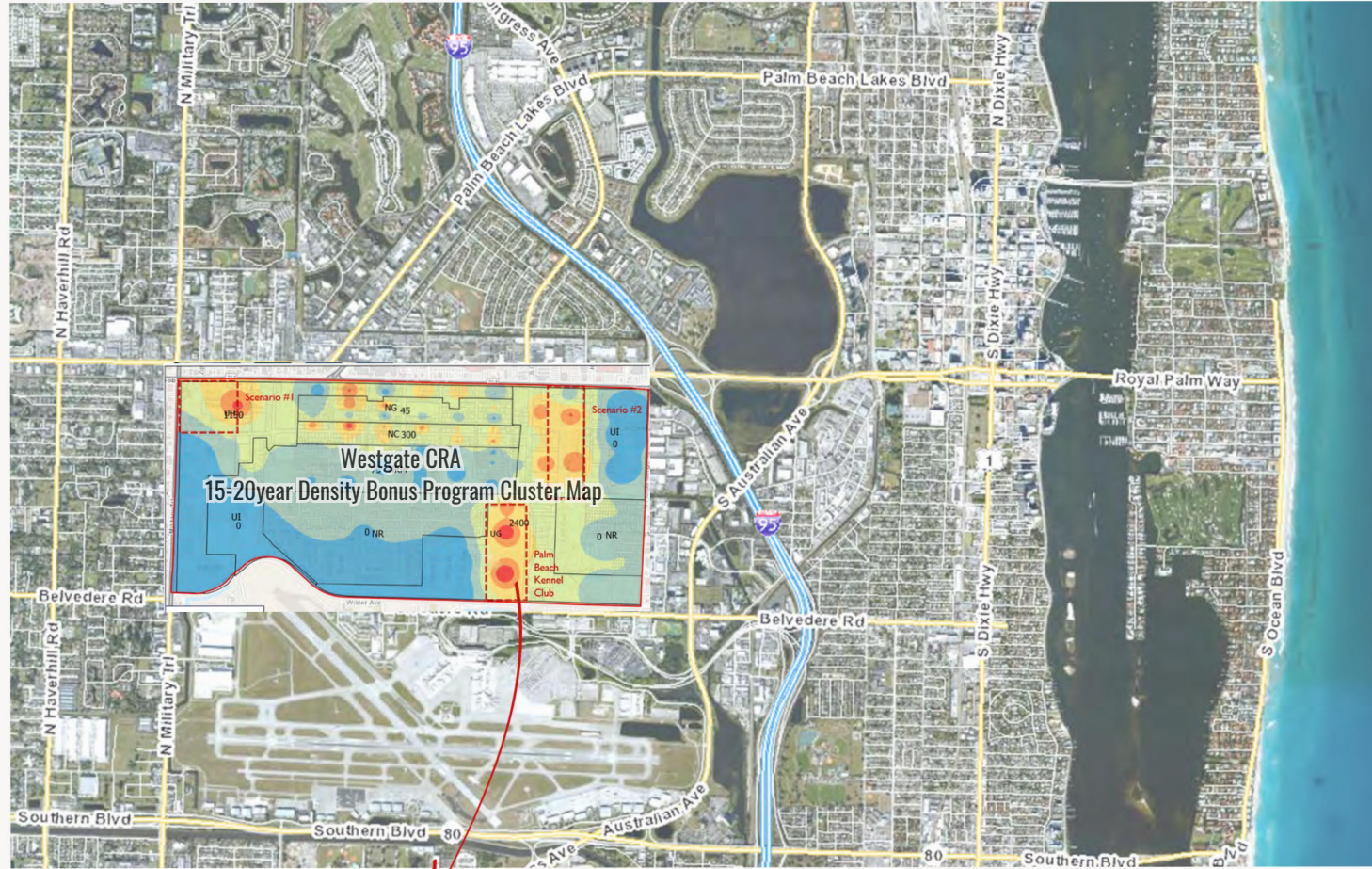
- 185 acres+ susceptible to higher density redevelopment including non-residential uses that could be converted to residential over time
- CRA projecting demand for **+/-3,000** residential units over 15-20 year horizon based on population growth rates

2024-2029 Population Growth Rate	
Area	Growth Rate
Westgate CRA District	1.53%
Westgate CRA District – 1-mile radius	1.32%
Zip code 33409 (West Palm Beach)	0.74%
Palm Beach County	0.47%
Florida	0.93%
USA	0.38%

- Density cluster framework considers large, underutilized sites – PBKC/Congress Ave., Cross County Mall, mobile home parks, Okeechobee Blvd. at Wabasso Dr., Westgate Ave. infill = **higher density residential & TOD/TOC**

Traffic Impacts

- 5,445 net new daily trips; 840 am peak hour + 403 pm peak hour trips
- Assumed 10% internal trip capture
- Considered 33% trip credit from existing square footage anticipated to convert from a non-residential use to a residential use
- **No roadway links are expected to exceed LOS D service volumes**



Kennel Club (42-acre phased redevelopment program)

Phase 1 - 405 units

Phase 2 - 325 units

Phase 3 - 415 units + 120,000 sf retail

Total: 1,145 units (27 du/ac)

WESTGATE CRA

MOBILITY PLAN FRAMEWORK & STRATEGIES

September 15, 2025

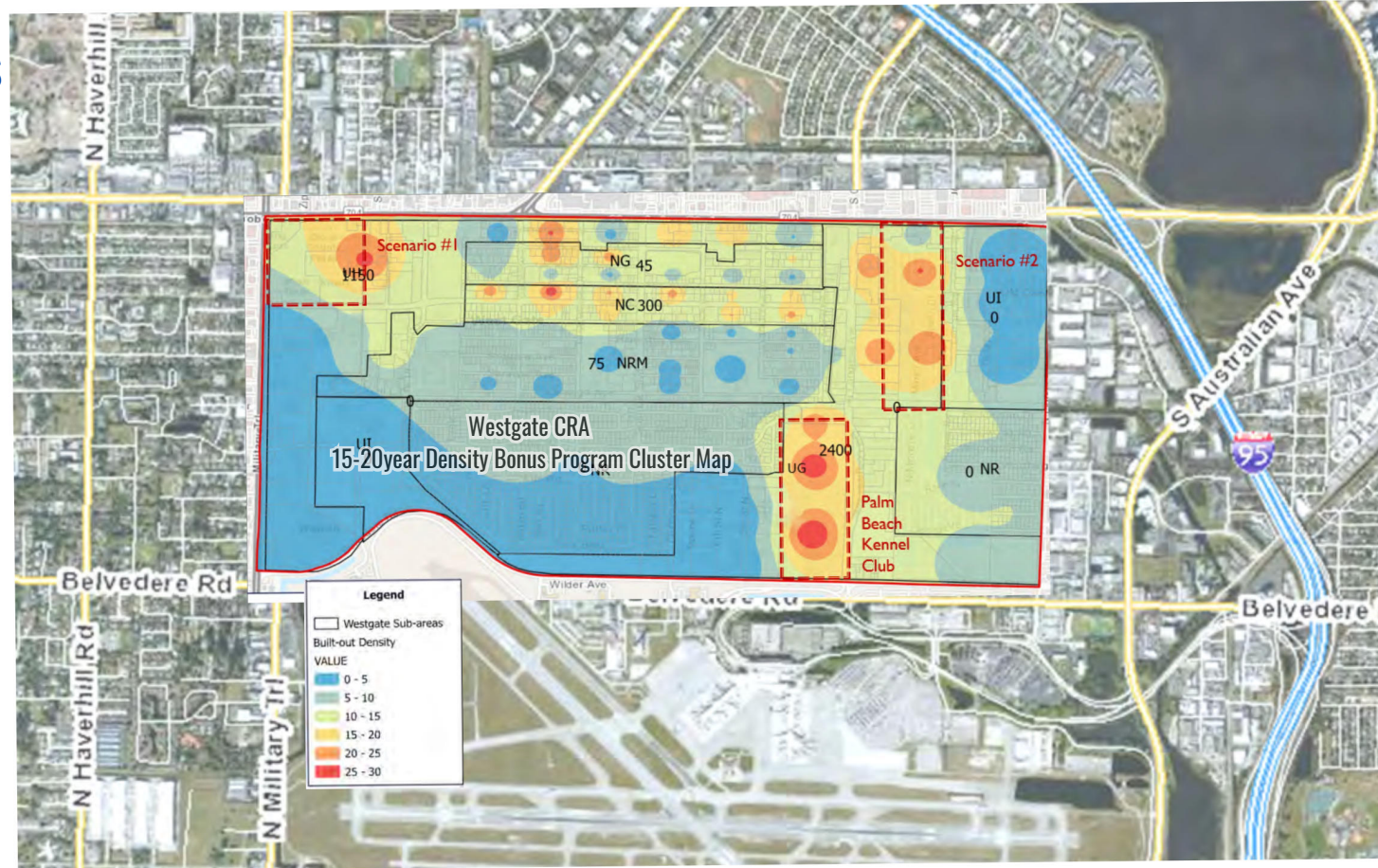
REGULATORY REDEVELOPMENT INCENTIVES

County Comprehensive Plan

- Density Bonus Program (DBP) – floating pool of density beyond FLU (8 du/ac)– no FLU amendment = expedited entitlements to facilitate redevelopment
- Development interest means Pool is depleting - **was 1,300 units, now 623 units**
- CRA initiative to increase to support build out and housing demand underway
- Traffic Concurrency Exception Area

Unified Land Development Code (ULDC)

- Westgate Community Redevelopment Area Overlay – use regulations, form-based standards for building placement & orientation
- Reduced parking ratios for multifamily & mixed use – on-street parking on Westgate Ave.
- Reduced setbacks & landscape buffers, additional height allowances
- Implements DBP allowing for max. number of units per acre by Sub-area
 - UH - max. 120 bonus du/ac (10 stories)
 - UG - max. 150 bonus du/ac (20 stories)
 - NC - max. 50 bonus du/ac (6 stories)
 - NG - max. 30 bonus du/ac (4 stories)



WESTGATE CRA
MOBILITY PLAN FRAMEWORK & STRATEGIES
September 15, 2025

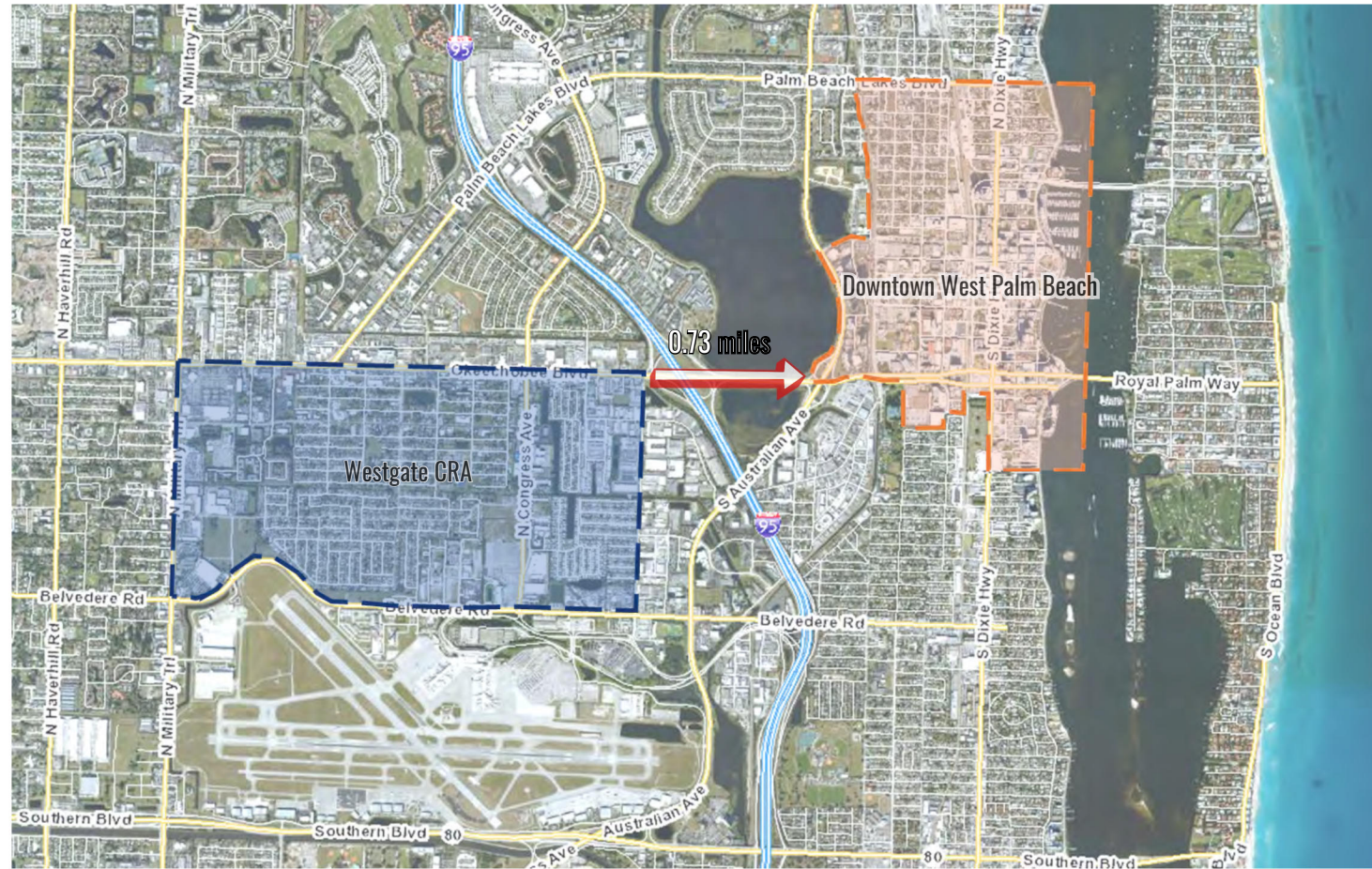
CRA MOBILITY PLAN FRAMEWORK

Mobility Goals:

- ➡ Responsible, sustainable growth
- ➡ Safe, well-connected roadway network
- ➡ Solutions-oriented collaboration

Growth-Based Mobility Implementation:

- support redevelopment in density clusters
- implement programmatic mitigation strategies
- start with short-term cost feasible projects
- increase intensity of project and program implementation to align with:
 - redevelopment pace
 - traffic congestion triggers
 - CMTP priority projects
 - City of WPB projects
- 'Dream Big' mobility projects– require interjurisdictional collaboration + layered funding sources

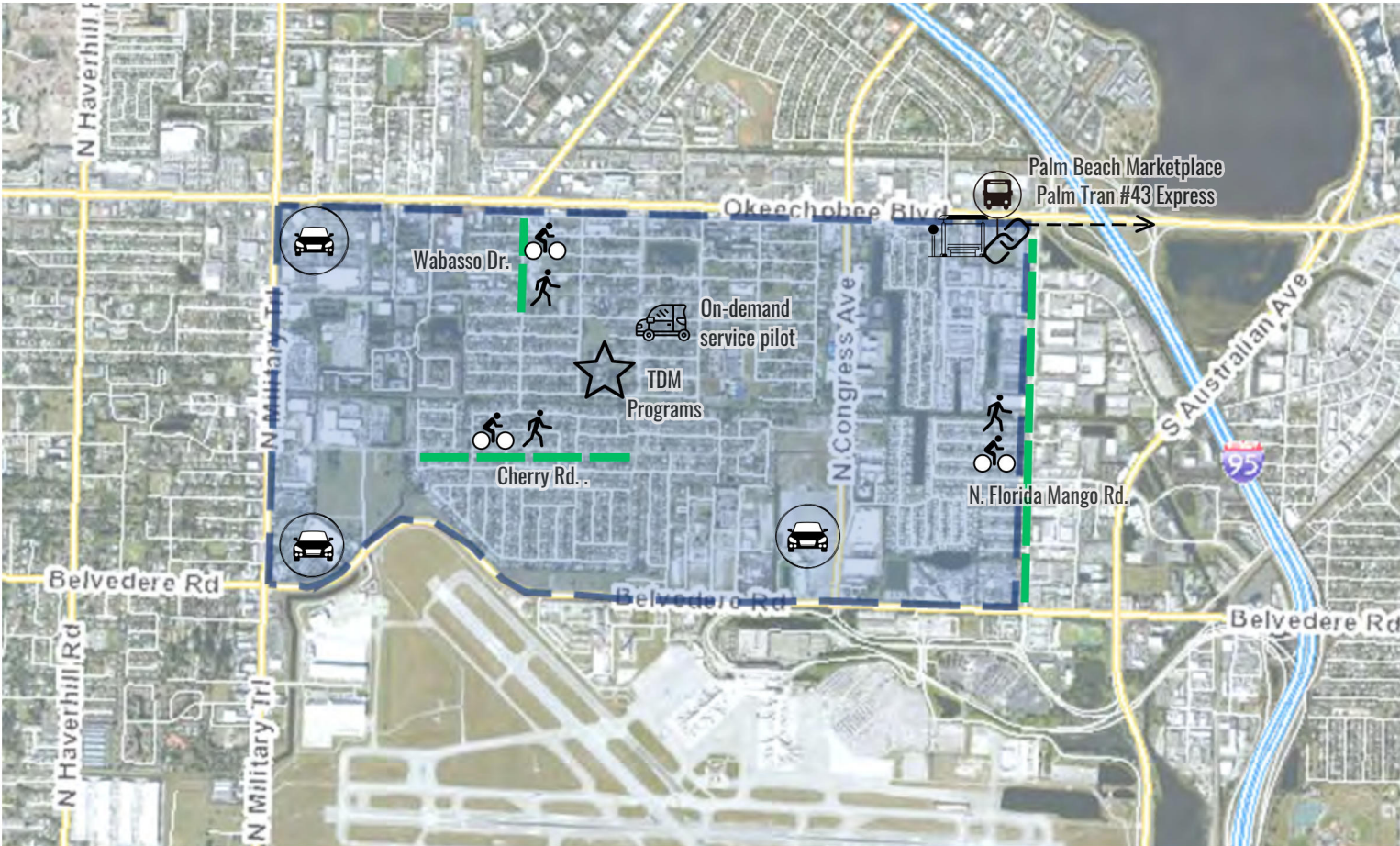


WESTGATE CRA MOBILITY STRATEGIES

TRAFFIC MITIGATION

Short Term (≤ 5 years)

-  Launch of on-demand service pilot CRA-wide connecting residential areas to #43 bus stop EB near PB Marketplace, and inter-CRA destinations (Walmart, Adult Ed. facility, etc.)
-  Palm Tran collaboration to improve bus stops and shelters along strong ridership routes
-  Continued sidewalk/bike lane improvements – Cherry Rd., Wabasso Drive. & N. Florida Mango Rd.
-  TDM programming – CRA-wide existing and new multifamily, larger employers (Kennel Club, County facilities, schools, auto uses)
-  Potential temporary Park & Ride locations--shared tenant parking – Cross County Mall, Walmart Plaza, Kennel Club
-  DWPB + Westgate connections 'Feasibility Study'
-  Land development codes – TOD/TOC design, parking reforms/reductions



CRA FY26 BUDGET ALLOCATIONS (BCC budget adoption 9/30/25):	
\$450,000	'Public Transportation' – for TDM program & on-demand pilot launch
<u>\$555,000</u>	'Technical Assistance & Engineering/Construction Coordination' –
\$1,005,000	for planning, engineering feasibility, design, implementation

WESTGATE CRA MOBILITY STRATEGIES

TRAFFIC MITIGATION

Mid Term (5-10 years)

 Increased Palm Tran frequency and reduced headways for important links – #44 (Congress Ave., PBIA)

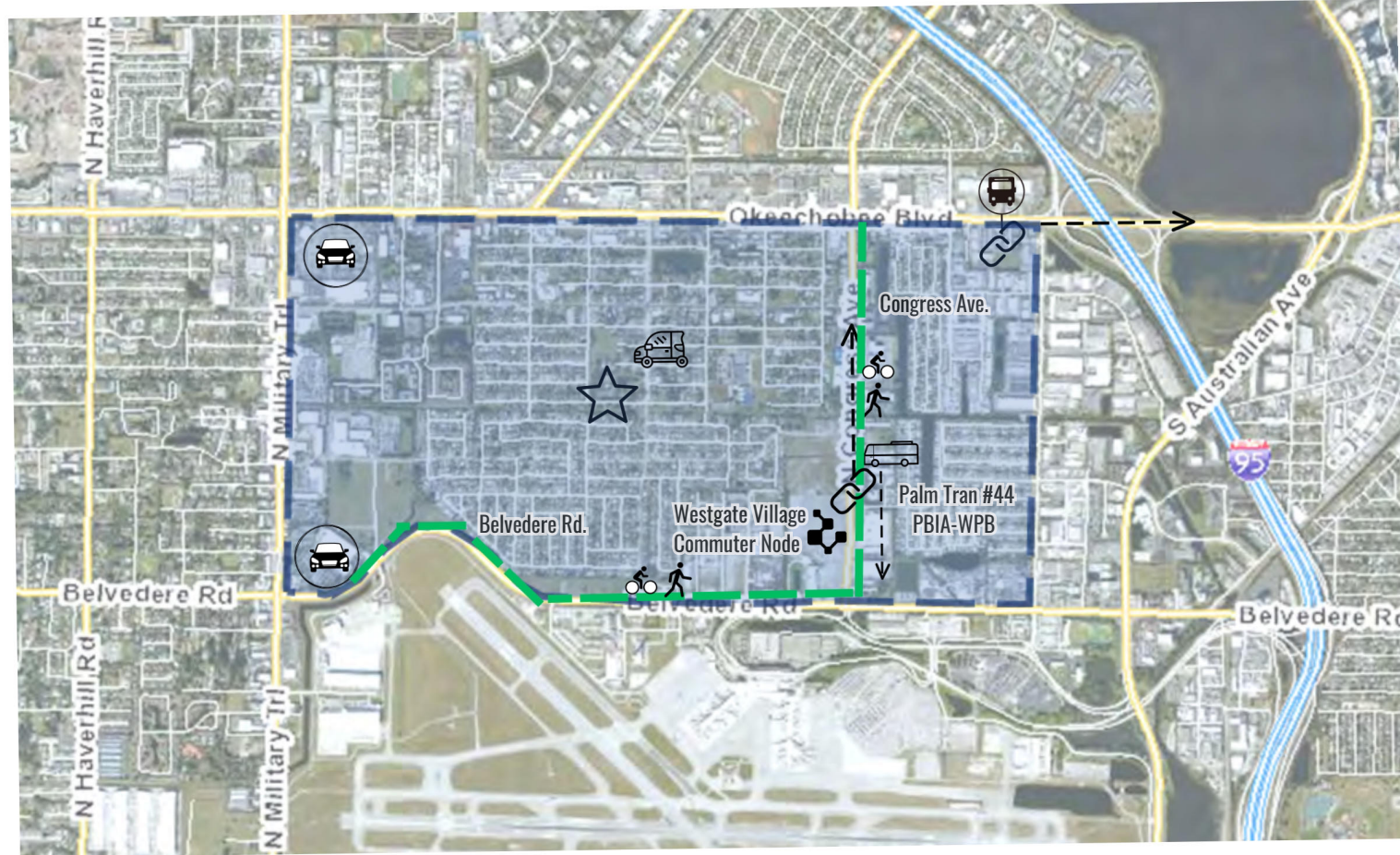
 Continued sidewalk/bike lane improvements – Congress Avenue, Belvedere Rd.

 Ongoing improvements to connections to Intermodal Station/PBIA

 Potential temporary Park & Ride locations—shared tenant parking – Cross County Mall, Walmart Plaza

 Ongoing TDM programming and on-demand service— CRA-wide

 Potential 'Westgate Village' commuter node



WESTGATE CRA
MOBILITY PLAN FRAMEWORK & STRATEGIES
September 15, 2025

WESTGATE CRA MOBILITY STRATEGIES

TRAFFIC MITIGATION

Long Term (10-15+ years)



Potential transit hub locations -
Cross County Mall Commuter Node
(Integrated Park & Ride), Wabasso
Dr. at Okeechobee Blvd., Old
Congress Ave. 'sliver'



'Dream Big' project: create
Okeechobee Blvd. reliever road by
culverting PBC-owned L-2 canal
segment – future connections to
Australian Ave., Centerpark Dr.,
Mercer Ave.

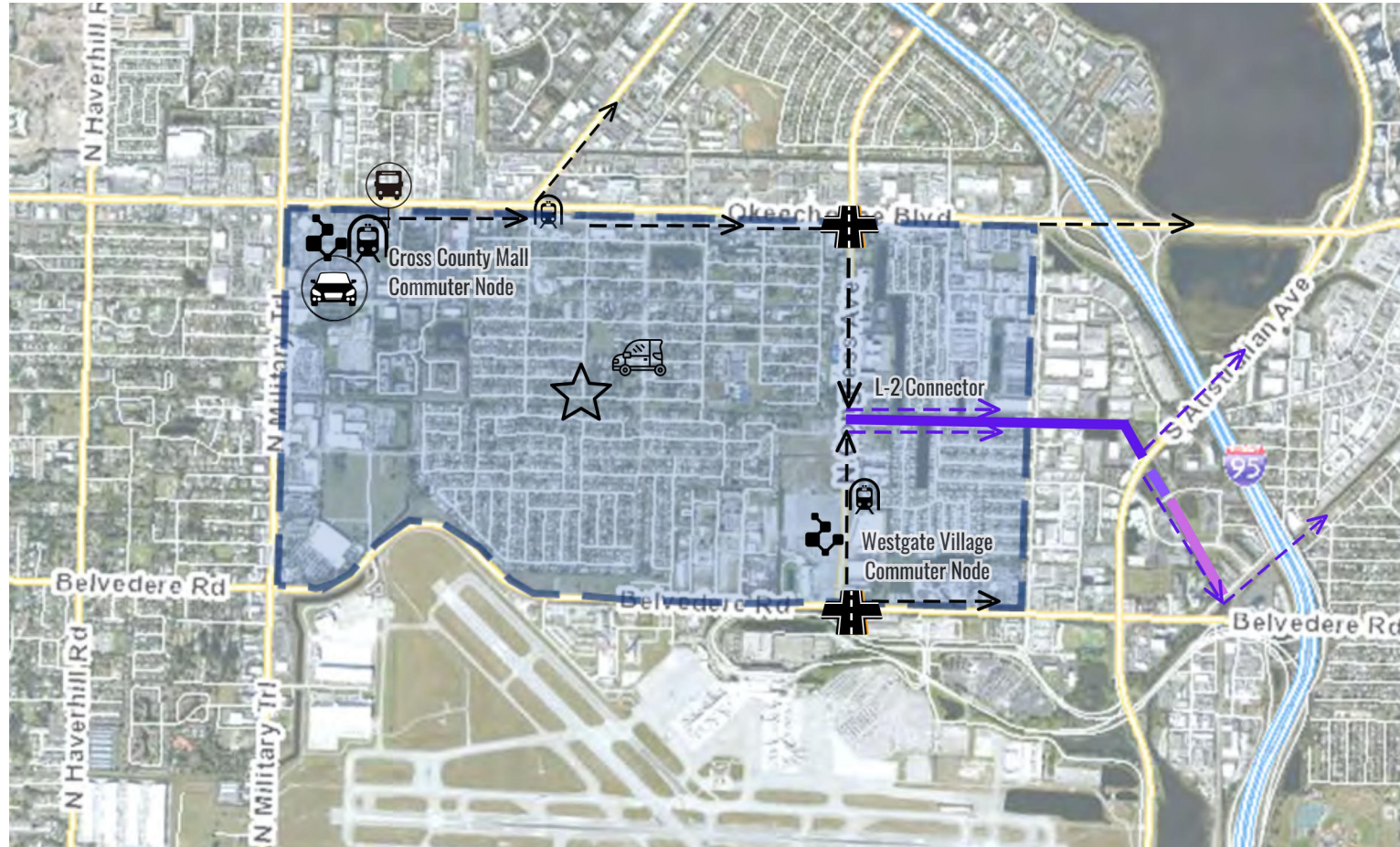


Ongoing TDM programming and
on-demand service – CRA-wide



Intersection improvements in
partnership with PBC:

- Okeechobee Blvd. & Congress Ave. (WBL turn lane)
- Belvedere Rd. & Congress Ave. (SBL turn lane)



WPB + WESTGATE CRA

An Opportunity to Collaborate

CRA MODE SPLIT (Westgate CRA ACS 2024):

- 77% drive alone
- 15.3% carpool
- 4.1% public transit
- 1.7% walk
- 27.9% commute in 15min. and under
- 44.5% commute in 15 - 30min.

DOWNTOWN WEST PALM BEACH MODE SPLIT (DMPU 2025):

- 69.5% drive alone
- 15.1% carpool
- 1.2% public transit
- 9.8% walk
- 35+% trips are under 5 miles
- 70% of trips are take under 20min.
- Nearly 50% are traveling for work, home & shopping

WHERE ARE WESTGATE COMMUTERS GOING?:

- 72.5% commuters travel 30 minutes
- ~20% traffic trips exit the CRA and use Okeechobee Blvd. EB to I-95, Australian Ave., and employment in downtown WPB, and beyond. (CRA Traffic Impact Analysis 2025)

Interjurisdictional Cooperation: City of West Palm Beach and Westgate CRA

- Joint Feasibility Study
- Connect Mobility Plans
- Align land use policies and regulations



0.73 miles



WESTGATE CRA

MOBILITY PLAN FRAMEWORK & STRATEGIES

September 15, 2025

MOBILITY STRATEGIES + COUNTY & PUBLIC INPUT = CRA MOBILITY PLAN

Next Steps for the Westgate CRA:

- Preliminary feasibility, cost analysis for identified projects
- – explore funding opportunities
- Study engineering viability and cost feasibility of L-2 Canal
- Connector project (traffic congestion bypass route from Congress Ave. to Australian Ave.) + N. Florida Mango Rd. sidewalks/streetlights– underway
- Community input for Westgate CRA Mobility Plan – 1st meeting in October 2025
- Launch on-demand service pilot (1 vehicle in Q1 FY26) – underway
- Initiate TDM programming – large employers, existing MF + new MF development (Q1 FY 26)
- Sidewalk/streetlight improvements on Wabasso Dr.;
- Sidewalks on Cherry Rd. – planning, design, possible PBTPA TAP funding
- Sidewalk/streetlight improvements on N. Florida Mango Rd. planning, design, possible PBTPA TAP funding
- Density bonus initiative approval – BCC Feb. 2026
- Collaborate with PBC Engineering and Planning on CMTP-identified projects impacting Westgate
- Palm Tran collaboration to improve bus stops and shelters along strong ridership routes
- Palm Tran collaboration on future improvements to route #44 frequencies and headways
- Collaborate with PBC PZB, PBTPA & WPB on TOD design and regulations
- Belvedere Rd. & Congress Ave. intersection improvements planning phase

