

GARDENS EAST  
Future Land Use Map Amendment  
*Justification Statement*  
*November 19, 2025*

## I. Introduction

GS Palm Beach Owner LLC (“Applicant”) owns the property in the City of Palm Beach Gardens (“City”) currently known as Avana, an existing 448-unit multi-family residential community on the approximately 44.33-acre property (“Subject Property”). The Applicant seeks to redevelop the southern 9.41 acres of the Subject Property to add a tiered 4 & 6-story, 355-unit apartment complex (“Project”). The Project will provide pools, courtyards, a pickleball court, and open space and pedestrian amenities. It will also contribute to the City’s workforce housing availability and create a better integrated overall PCD community.

The Subject Property is the residential PUD of the overall 77-acre Gardens East Planned Community District (PCD). The PCD’s southern 32.36-acre commercial PUD is known as the Promenade Plaza (“Commercial Property”).

To accomplish the Project, this Application consists of three integrated components:

1. Small-Scale Future Land Use Map Amendment: application to change the Subject Property’s future land use designation from Residential Medium (RM) to Residential High (RH);
2. Gardens East PCD Amendment: application to establish an underlying RH zoning designation and amend the permitted dwelling units (“PCD Amendment Application”);
3. Gardens East Apartments PUD Amendment: application to amend the existing Gardens East Apartments Site Plan to remove 48 existing units and add a tiered 4 & 6-story, 355-unit apartment complex with landscape, hardscape, and amenities and establish Tiering Guidelines (“PUD Amendment Application”).

This Justification Statement relates to the proposed Future Land Use Map Amendment (“FLU Map Amendment” or “Application”).

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**Fees**

<b>Application Request</b>	<b>Fee</b>
Comp. Plan "Small Scale" LU Map Amendment	\$2,500.00
GIS Review Open Space	\$300.00
Advertising Escrow	\$1,000.00
Legal Escrow	\$1,500.00
Engineering Escrow	\$1,000.00
Traffic Escrow	\$1,000.00
<b>TOTAL</b>	<b>\$7,300.00</b>

## II. Project Overview

### Location

The Subject Property encompasses approximately 44.33 acres. It is located at the intersection of Burns Road and Alternate A1A. To the north of the Subject Property (across Burns Road) is Catalina Lakes, a residential neighborhood. To the east (across Gardens East Dr) are the Cedar Gardens and Sandalwood multi-family residential communities, and professional office uses. To the south is the Promenade Plaza, and to the west is various industrial and residential medium uses (across Alternate A1A and the Florida East Coast (FEC) Railroad).

### Project History

On March 5, 1987, the City Council approved Ordinance 2, 1987, establishing the 77-acre Gardens East Planned Community District. The PCD created the residential Subject Property and the Commercial Property and required each to be developed as separate Planned Unit Developments.

On December 7, 1989, City Council approved Ordinance 40, 1989, amending the PCD to allow 10 dwelling units per acre, or 448 dwelling units, on the Subject Property.

On January 4, 1990, the City Council approved Resolution 109, 1989, creating a PUD and providing site plan approval for the Gardens East Apartments on the Subject Property, the existing 448-unit multi-family residential community.

### Land Use and Zoning

The Subject Property’s current zoning designation is PCD overlay and its existing future land use designation is Residential Medium (RM). Notably, when the PCD was created, an underlying zoning designation was not established. However, Ordinance 40, 1989 provided for 10 units/acre, which is consistent with the base density set forth in the Code’s Residential High (RH) land use and zoning designation. The operative development order for the Subject Property is Resolution 109, 1989, which approved the current site plan that allows 448 dwelling units on the Subject Property.

<b>SURROUNDING PROPERTIES</b>			
<b>DIRECTION</b>	<b>PROJECT</b>	<b>LAND USE</b>	<b>ZONING</b>
NORTH	Catalina Lakes (Across Burns Rd)	Residential Medium	RM
SOUTH	Promenade Plaza	Commercial	PCD
EAST	Professional Office /Cedar Gardens /Sandalwood (Across Gardens East Dr)	Professional Office / Residential Medium	PO/RM
WEST	Various Industrial / Single Family Residential Neighborhood (Across A1A and FEC Rail)	Industrial / Residential Medium	M1A/RM

### III. Future Land Use Map Amendment

The Application proposes to amend the Subject Property's designation on the City's Future Land Use Map from Residential Medium (RM) to Residential High (RH). The RH designation will allow the Project's proposed density to be integrated with the existing residential community, thereby enhancing the character of the community and providing workforce housing to the City's residents. The FLU Map Amendment is consistent with the City's Comprehensive Plan and satisfies Florida's statutory requirements, as discussed herein.

#### A. Consistency with the Comprehensive Plan

Future Land Use Element Goal 1.1.: Continue to ensure a high quality living environment through a mixture of land uses that will maximize Palm Beach Gardens' natural and manmade resources while minimizing any threat to the health, safety, and welfare of the City's citizens that is caused by incompatible land uses and environmental degradation, by maintaining compatible land uses which consider the intensities and densities of land use activities, their relationship to surrounding properties and the proper transition of land uses.

*The Subject Property is currently zoned Residential Medium and has a density of 10 units per acre. The Subject Property is surrounded by residential medium uses to the north and east, commercial uses to the south, and light industrial residential medium uses to the west. The proposed RH land use will serve as a transition between the residential medium uses and the more intense commercial and light industrial uses. The Application maintains compatible land uses with the surrounding properties.*

#### Future Land Use Element Objective 1.1.1: Future Land Use Categories

*The Project is consistent with the Zoning Consistency Chart set forth in Table 1-1 in Objective 1.1.1 because the Subject Property has an existing PCD overlay district and the concurrent applications propose establishing the RH underlying zoning designation, consistent with the proposed RH land use.*

#### Future Land Use Element Policy 1.1.1.5: Residential high (RH)

*The intent of the RH land use designation in the City's Comprehensive Plan is to assist the private sector in providing affordable housing in the City. It provides for RH land uses to be located contiguous to major arterials and serve as a transition between Residential Low and Residential Medium uses and more intense commercial uses. It also intends for RH land uses to be located in areas accessible to shopping and employment opportunities and where existing utilities and infrastructure exist. The proposed Project satisfies the intent of the RH land use designation and is consistent with this policy of the Comprehensive Plan. It has access to Alternate A1A and will serve as a transition between the Residential Medium land uses to the north and east and the Commercial uses to the south. It is also located next to shopping and employment opportunities at the Promenade Plaza. The Subject Property is currently developed and contains existing infrastructure to support the redevelopment. The Project will also provide 36 units of workforce housing.*

Transportation Policy 2.2.1.6. The City shall encourage connectivity of roadways and cross connection of property with similar or compatible land uses in the City to improve accessibility,

reduce congestion on arterial and collector roads, including bicycle and pedestrian connections, and utilize traffic calming measures to minimize the traffic impacts on residential neighborhoods.

*The FLU Map Amendment increases the density for the Subject Property, which is located adjacent to the existing commercial plaza to the south. The proposed land use is compatible with the surrounding residential neighborhoods because it allows a smooth transition from residential to nonresidential uses. The request will provide improved accessibility and pedestrian connections between the uses.*

Transportation Policy 2.3.2.2. The City shall encourage redevelopment providing workforce housing, pedestrian oriented design, and access to public transit.

*The FLU Map Amendment encourages redevelopment that provides workforce housing to an existing residential site.*

Transportation Policy 2.3.2.3. The City shall implement the improvements identified in the mobility plan to address last-mile accessibility connections to transit.

*The FLU Map Amendment is consistent with this policy because it will provide for the mix of residential and non-residential uses needed to support the Subject Property and, in turn, the mobility plan's last-mile transit connectors by bringing residents, professionals, and visitors to the site.*

## B. Compliance with Florida law

Section 163.3184 of Florida's Community Planning Act requires any amendment to the City's Comprehensive Plan to be consistent with Sections 163.3177, 163.3178, 163.3180, 163.3191, 163.3245, and 163.3248, the appropriate strategic regional policy plan, principles for guiding development in designated areas of critical state concern, and with part III of chapter 369, where applicable. Section 163.3184, Florida Statutes. The proposed amendment satisfies the requirements of Sections 163.3177 and 164.3180.<sup>1</sup>

Section 163.3177. Required and optional elements of comprehensive plan; studies and surveys.

- (6)(a)8. Future land use map amendments shall be based upon the following analyses:
- a. An analysis of the availability of facilities and services
  - b. An analysis of the suitability of the plan amendment for its proposed use considering the character of the undeveloped land, soils, topography, natural resources, and historic resources on site.
  - c. An analysis of the minimum amount of land needed to achieve the goals and requirements of this section.

*The Subject Property is currently developed with available facilities and services. There are no historic resources on site and any existing natural resources will not be adversely impacted.*

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<sup>1</sup> Section 163.3178 regarding Coastal Management, 163.3191 regarding the City's evaluation of its comprehensive plan, 163.3245 regarding sector plans, and 163.3248 regarding rural land stewardship areas are not applicable to the Subject Property.

(6)(a)9. The future land use element and any amendment to the future land use element shall discourage the proliferation of urban sprawl.

*The FLU Map Amendment discourages the proliferation of urban sprawl by redeveloping an existing residential community with additional density on site and adjacent to existing non-residential uses. The Project is supported by workforce housing opportunities and increased height and density allowances that encourage a compact urban core community, as opposed to urban sprawl.*

b. The future land use element or plan amendment shall be determined to discourage the proliferation of urban sprawl if it incorporates a development pattern or urban form that achieves four or more of the following:

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

*The Project locates economic growth and associated development on an existing, developed site that will not adversely impact natural resources or ecosystems. The FLU Map Amendment will provide additional density on site that will serve the City's residents, including providing workforce housing units. These residents will also use the existing commercial and office uses adjacent to the site, which encourages and contributes to economic growth on the existing Subject Property.*

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

*The Project redevelops a portion of the existing center in an efficient and cost-effective manner because the site contains adequate public infrastructure and services. The FLUM Amendment will permit the new multi-family residential project to be located on the existing site to take advantage of the existing infrastructure and services.*

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

*The RH land use designation promotes walkable, connected, and compact communities by allowing the increased density on site, providing pedestrian amenities, and integrating the site to the existing commercial plaza with a connected bridgeway.*

(IV) Promotes conservation of water and energy.

N/A

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

N/A

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

*The FLU Map Amendment supports the density for the proposed residential project, which creates open and recreation space through green areas, lawns, zen gardens, courtyards, pickleball court, and pools*

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

*Palm Beach Gardens continues to grow with new residents and businesses. The RH land use designation will bring increased multi-family residential density to support the City's housing and workforce housing needs. Bringing additional permanent residents to the site will provide a support system to the existing commercial uses adjacent to the property.*

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

*The FLU Map Amendment brings increased density to the Subject Property and adjacent to existing commercial uses, which reduces urban sprawl.*

#### Section 163.3180. Concurrency

*The Project will satisfy all required concurrency standards as set forth in the City's Comprehensive Plan and Land Development Regulations and detailed below.*

## D. Level of Service Analysis

The following is an analysis of the maximum impact potential on facilities and services based on the proposed RH Future Land Use designation.

**Water and Wastewater:** Seacoast Utility Authority (SUA) provided a statement dated November 13, 2025, determining available capacity. The statement of available capacity is consistent with Infrastructure Element Objective 4.A.1.1 and the Level of Service Standard established in Table 5 of Section 78-75 of the City's Code.

**Solid Waste:** The Solid Waste Authority (SWA) provided the statement dated January 15, 2025, certifying that the SWA has disposal capacity available to accommodate solid waste generation for the coming year, five-year, and ten-year planning periods. The forecasted capacity will be available through the year 2057. Sufficient capacity exists for concurrency management and comprehensive planning purposes related to this Application. The Application satisfies the level of service requirements for solid waste set forth in the Comprehensive Plan and the capacities set forth in Table 6 of Section 78-75 of the City's Code.

**Drainage:** The Applicant's engineer, Simmons & White, provided the drainage statement dated November 17, 2025, that demonstrates the drainage system will be designed to comply with the SFWMD standards and the City's Code. Runoff will be directed to paved or grass swales and/or inlets and storm sewer prior to discharging to the reconfigured onsite wet detention area. Legal

positive outfall is existing via control structure offsite 36-inch drainage culvert. The Application satisfies the City's level of service requirements.

**Fire Rescue:** The Applicant is working with the City's Fire Rescue department to provide a level of service statement to the City confirming their existing and future ability to service the Subject Property in relation to the FLU Map Amendment.

**Police Department:** The Applicant is working with the City's Police Rescue department to provide a level of service statement to the City confirming their existing and future ability to service the Subject Property in relation to the FLU Map Amendment.

**Traffic:** The proposed FLU Map Amendment from RM to RH is expected to operate at an acceptable level of service in the short-range (2030) horizon and the long range (2045) horizon. A detailed report from Kimley-Horn will be submitted.

**School.** The Applicant will apply to the Palm Beach County School District to determine the School Capacity Availability associated with the Project.

**Recreation.** The Recreation and Open Space Element consists of a single goal: to provide adequate, sustainable park, recreation and open space facilities and areas offering a broad range of activities to all current and future citizens. Recreation Element Policy 7.1.1.1 of the Comprehensive Plan and Table 8 of Section 78-75 of the Code establish a Level of Service of 5.0 acres of neighborhood or community parks per 1,000 permanent residents. The City currently has recreation inventory to meet the needs of the permanent resident population projection through 2030. This inventory is based on the City's publicly owned parks. The Project proposes 4.98 acres of privately-owned open and green space, including the existing lake and proposed walking trails, green space, courtyards, and zen gardens. The Project also includes a private pickleball court. These areas provide additional recreation space that will serve the new residents resulting from the proposed RH land use, as well as existing City residents. The Application satisfies the City's level of service standards.

## IV. Conclusion

This Application provides the foundation to accomplish the redevelopment Project by supporting the proposed multi-family residential density. This increased density supports the City's vision to locate RH land uses along major arterials, to provide increased density to transition between residential medium and more intense commercial uses District, and to provide workforce housing.