

Our File Number: 00064549-00001 Writer's Direct Dial: (561) 650-0633 Writer's E-Mail Address: jcrowley@gunster.com

February 19, 2024

Town of Palm Beach 360 S. County Road Palm Beach, FL 33480

RE: Project: 264 & 270 South County Road, Palm Beach, FL Zoning Case Number: ZON-24-052

We are pleased to submit our application and accompanying drawings for proposed modifications to approved special exception uses at the Carriage House, located at 264 & 270 S County Rd, Palm Beach, FL (the "Property"). The Carriage House originally received special exception and site plan approval on February 13, 2019, pursuant to zoning application number Z-018-00149, which approved a special exception for the private club use and for offsite supplemental parking (the "Existing Approvals"). A declaration of use agreement dated March 19, 2019 was subsequently recorded in order to document the conditions of approval for the Existing Approvals.

The scope of our current application includes a request for a special exception to permit outdoor café seating in the interior private courtyard. The forty proposed outdoor café seats would not be visible from any public way and would not cause any negative impacts to the surrounding neighborhood. We are not proposing to increase the approved seating count or to make exterior modifications to the Property. We have provided alternative seating plans showing a removal of 40 indoor seats during times when the outdoor café seating is in use.

In addition, we are proposing to modify the original special exception to permit an increase in the number of club members over a three-year period. We are requesting to increase the club membership by 75 members for the next three years. The Carriage House is currently operating well below the maximum seating and occupancy numbers allowed by the Existing Approvals, and we are not proposing to increase permitted seating count or occupancy as a part of this application. Carriage House has a long-term lease which provides sufficient parking to accommodate the proposed increase in membership, and the location and number of parking spaces under this lease were previously evaluated and approved in connection with the Existing Approvals.

The number of parking spaces available for offsite supplemental parking through an existing lease agreement remains at 68, which exceeds the number of parking spaces that are required for the cumulative 3-year increase in membership currently being proposed. The offsite supplemental parking will remain at 230 and 240 Royal Palm Way, as presented to the Town Council during the time the Existing Approvals were originally issued. We have included both the traffic study that was presented to the Town Council during the original consideration of the project, as well as a new traffic study evaluating the parking and traffic conditions in light of the membership

Phillips Point, Suite 500 East, 777 South Flagler Drive • West Palm Beach, FL 33401-6194 | 561-655-1980 | Fax: 561-655-5677 | www.gunster.com

increase being requested. Carriage House has an agreement in place to utilize this offsite supplemental parking per the Existing Approvals, and through an agreement with the property owners (JHD Associates, LLC). The parking and traffic studies included with this submittal are based upon data collected during peak season, clearly establishing there is adequate parking supply to meet the demands of increased club membership. Finally, our submittal includes a Traffic Impact Analysis from Kimley Horn demonstrating that the increase in membership will have a de minimus impact upon the Town's roadway network.

The following criteria apply to this application:

- A. Landmarks Preservation in accordance with Section 54-122 and/or Section 54-161.
 a. Not Applicable.
- B. Architectural Review in accordance with Section 18-205 and/or Section 18/206.
 - a. Not Applicable.
- C. SPECIAL EXCEPTION 134-229
 - a. Per Section 134-1109(14), Code of Ordinances, a special exception is required for outdoor café seating in connection with our request to provide 40 outdoor dining seats in the interior courtyard.

Section 134-229:

- 1. The use is a permitted special exception use as set forth in article VI of this chapter.
- 2. The use is so designed, located and proposed to be operated that the public health, safety, welfare and morals will be protected. Pedestrian walkway will not be impeded.
- 3. The use will not cause substantial injury to the value of other property in the neighborhood where it is to be located.
- 4. The use will be compatible with adjoining development and the intended purpose of the district in which it is to be located.
- 5. The use will comply with yard, other open space, and any special requirements set out in article VI for the particular use involved. The use will meet requirements of Sec.134-2016.
- 6. The use will comply with all elements of the comprehensive plan.
- 7. The use not result in substantial economic; noise, glare, or odor impacts on adjoining properties and properties generally in the district.
- 8. Adequate ingress and egress to property and proposed structures thereon and off-street parking and loading areas will be provided where required, with particular reference to automotive and pedestrian safety and convenience, traffic flow and control, and access in case of fire or catastrophe.
- 9. Signs, if any, and proposed exterior lighting with reference to glare, traffic safety, and economic impact shall be compatible and in harmony with properties in the district. No additional signage or lighting is proposed.

- 10. Location, availability and compatibility of utility service for the use shall be satisfactory to ensure health and safety. Utility services are existing.
- 11. Refuse and service areas for the use shall not adversely affect automotive and pedestrian safety and convenience, traffic flow and control, or access in case of fire or catastrophe.
- 12. Carriage House is town serving (see Exhibit "A" attached to this letter of intent).
- 13. If historic/specimen trees are located on the subject property, the location of said historic/specimen trees shall be identified on a signed and sealed survey. In addition, adequate landscaping, screening and barricade protection of historic/specimen trees shall be demonstrated to be provided as required in this chapter. N/A
- 14. The proposed use will not place a greater burden than would be caused by a permitted use on municipal police services due to increased traffic or on fire protection services due to the existence of or increased potential for fire/safety code violations.

Outdoor café seating is a permitted special exception use in the C-TS zoning district. The current application proposes 40 outdoor café seats to be located in the interior courtyard of the Property in order to eliminate any negative impacts on the surrounding neighborhood. We have provided seating plans to demonstrate that interior seating will be reduced during times that the outdoor café seating is in use in order to satisfy existing limitations on seating and occupancy, which will not change as a result of this application. Outdoor café seating will not be conducted after 10 PM.

The standards and criteria that must be met to approve outdoor café seating on private property not within a street sidewalk are found in Section 134-2106(b), and include the following:

- 1. Outdoor cafe seating is not allowed to increase the capacity of a restaurant, dining room, retail specialty food including the sale of prepared food for takeout only, or private, social, swimming, tennis or yacht club. The exception is that a specialty foods use, including sale of prepared foods for takeout only that is under 2,000 square feet in gross leasable area may request up to eight [additional] outdoor cafe seats over the inside capacity provided that the seating meets the conditions herein.
- 2. Bars/lounges and nightclubs are not permitted to have outdoor cafe seating.
- 3. Outdoor cafe seating is restricted to boundary lines of the property on which the business owned by the applicant is located.
- 4. All tables, chairs, umbrellas, mist sprayer, space heaters or other customarily usual outdoor cafe seating furniture shall be located in such a manner that a minimum four foot-wide unobstructed pedestrian path is maintained at all times.

- 5. No objects shall be permitted around the perimeter of an outdoor cafe seating area occupied by tables and chairs that would have the effect of forming a physical or visual barrier discouraging the use of the pedestrian path.
- 6. An outdoor cafe seating area on private property shall only be allowed to have low-level, background music that does not exceed the maximum noise decibel requirements in sections 42-226 through 42-228 if approved by the town council as part of the special exception application approval.
- 7. No wait stations shall be allowed outside on a street sidewalk. All wait stations on private property shall not be visible from a sidewalk or street.
- 8. All kitchen equipment used to service the outdoor cafe seating shall be located within a building.
- 9. All outdoor cafe seating furniture, including all accessary appurtenances including but not limited to approved space heaters, misters and portable umbrellas that are located within the outdoor seating area shall be stored inside a building after close of business.
- 10. All outdoor cafe seating furniture, including the tables, chairs, awnings and space heater equipment shall be aesthetically and architecturally pleasing and approved by either the Architectural Commission or Landmark Preservation Commission, whichever is applicable.
- 11. The area covered by an outdoor cafe seating permit, and the sidewalk and street immediately adjacent to it, shall be maintained in a clean, neat and orderly appearance at all times and clear of any trash or refuse by the permittee. The area of the sidewalk, curb and gutter immediately adjacent to the sidewalk cafe shall be cleared of all debris during hours of operation and again at the close of each business day, or as may otherwise be determined by the director.
- 12. Areas associated with the outdoor cafe seating shall not count toward any maximum square footage limitations.

As stated above, the proposed outdoor café seats will not increase the existing seating and occupancy limitations that were imposed in connection with the Existing Approvals. The private club use is not a bar, lounge or nightclub, and the proposed outdoor café seating area is within a fully enclosed interior courtyard, with most of the proposed seating oriented towards S. County Road and away from Phipps Park. All outdoor furniture and support equipment will be positioned so that unobstructed movement within a 4-foot path will be maintained in the outdoor café seating area, and no physical barriers to the area will be used that might discourage pedestrian movement. All outdoor furniture and support equipment will either be stored within a building after the Club closes, or kept securely in the outdoor café seating area, which is not visible from beyond the exterior walls of the courtyard. Landmarks Preservation Commission approval of the outdoor furniture will be secured if necessary, prior to the use of any outdoor furniture. No outdoor music is currently proposed for the outdoor café seating area, and waiting stations will be located so as to not be visible from a street or sidewalk. The kitchen inside the Club will be used to prepare the food served in the outdoor café seating area will be maintained in a neat, clean, and aesthetically pleasing appearance at all times, and free from any and all trash and refuse.

b. Per Section 124-1109(3), special exception is required to modify the existing special exception use to allow a private club in the C-TS zoning district to allow for an expansion of the club membership of 75 per year for the next three (3) years, which will increase the current membership from 232 members to 457 members in three (3) years time.

Section 134-229:

- 1. The use is a permitted special exception use as set forth in article VI of this chapter.
- 2. The use is so designed, located and proposed to be operated that the public health, safety, welfare and morals will be protected. Pedestrian walkway will not be impeded.
- 3. The use will not cause substantial injury to the value of other property in the neighborhood where it is to be located.
- 4. The use will be compatible with adjoining development and the intended purpose of the district in which it is to be located.
- 5. The use will comply with yard, other open space, and any special requirements set out in article VI for the particular use involved. The use will meet requirements of Sec.134-2016.
- 6. The use will comply with all elements of the comprehensive plan.
- 7. The use not result in substantial economic; noise, glare, or odor impacts on adjoining properties and properties generally in the district.
- 8. Adequate ingress and egress to property and proposed structures thereon and off-street parking and loading areas will be provided where required, with particular reference to automotive and pedestrian safety and convenience, traffic flow and control, and access in case of fire or catastrophe.
- 9. Signs, if any, and proposed exterior lighting with reference to glare, traffic safety, and economic impact shall be compatible and in harmony with properties in the district. No additional signage or lighting is proposed.
- 10. Location, availability and compatibility of utility service for the use shall be satisfactory to ensure health and safety. Utility services are existing.
- 11. Refuse and service areas for the use shall not adversely affect automotive and pedestrian safety and convenience, traffic flow and control, or access in case of fire or catastrophe.
- 12. Carriage House is town serving (see Exhibit "A" attached to this letter of intent).
- 13. If historic/specimen trees are located on the subject property, the location of said historic/specimen trees shall be identified on a signed and sealed survey. In addition, adequate landscaping, screening and barricade protection of historic/specimen trees shall be demonstrated to be provided as required in this chapter. N/A
- 14. The proposed use will not place a greater burden than would be caused by a permitted use on municipal police services due to increased traffic or on fire

protection services due to the existence of or increased potential for fire/safety code violations.

The private club use is a permitted special exception use in the C-TS zoning district, and that use was approved pursuant to the Existing Approvals in 2019. Since the opening of Carriage House, there have been no operational issues with the club use as it pertains to the surrounding neighborhood, and Carriage House has complied with every requirement of the existing declaration of use agreement at all times. There have been no issues with noise, smells, odor, traffic, parking, or traffic, and there has been no negative impact to the adjacent neighborhood. There will be no increase in total occupancy or seating above what was originally approved in connection with the Existing Approvals.

None of the concerns about traffic that were expressed during the evaluation of the original application have come to fruition, and the supplemental offsite parking is sufficient both practically and legally to support the increase in membership currently being proposed. Other than the increase in membership and outdoor café seating, no other modifications to the existing declaration of use are being proposed. We are requesting that the existing surplus of offsite supplemental parking be applied to the proposed increase in membership as discussed in Kimley Horn's parking analysis and as discussed further below.

c. Per Section 124-1109(7), special exception is required to modify the existing special exception for shared parking.

Section 134-229:

- 1. The use is a permitted special exception use as set forth in article VI of this chapter.
- 2. The use is so designed, located and proposed to be operated that the public health, safety, welfare and morals will be protected. Pedestrian walkway will not be impeded.
- 3. The use will not cause substantial injury to the value of other property in the neighborhood where it is to be located.
- 4. The use will be compatible with adjoining development and the intended purpose of the district in which it is to be located.
- 5. The use will comply with yard, other open space, and any special requirements set out in article VI for the particular use involved. The use will meet requirements of Sec.134-2016.
- 6. The use will comply with all elements of the comprehensive plan.
- 7. The use not result in substantial economic; noise, glare, or odor impacts on adjoining properties and properties generally in the district.
- 8. Adequate ingress and egress to property and proposed structures thereon and off-street parking and loading areas will be provided where required, with particular reference to automotive and pedestrian safety and convenience, traffic flow and control, and access in case of fire or catastrophe.
- 9. Signs, if any, and proposed exterior lighting with reference to glare, traffic safety, and economic impact shall be compatible and in harmony with properties in the district. No additional signage or lighting is proposed.

- 10. Location, availability and compatibility of utility service for the use shall be satisfactory to ensure health and safety. Utility services are existing.
- 11. Refuse and service areas for the use shall not adversely affect automotive and pedestrian safety and convenience, traffic flow and control, or access in case of fire or catastrophe.
- 12. Carriage House is town serving (see Exhibit "A" attached to this letter of intent).
- 13. If historic/specimen trees are located on the subject property, the location of said historic/specimen trees shall be identified on a signed and sealed survey. In addition, adequate landscaping, screening and barricade protection of historic/specimen trees shall be demonstrated to be provided as required in this chapter. N/A
- 14. The proposed use will not place a greater burden than would be caused by a permitted use on municipal police services due to increased traffic or on fire protection services due to the existence of or increased potential for fire/safety code violations.

Shared parking is a permitted special exception use in the C-TS zoning district, and the existing configuration of the parking that was approved pursuant to the Existing Approvals will not change. What will change is that the surplus parking we have been providing since the opening of the club will be reduced to accommodate the increase in the number of club members The parking study prepared by Kimley Horn demonstrates that there is sufficient parking beyond what is legally required to accommodate the increase in membership we are requesting.

D. SITE PLAN REVIEW 134-329

- 1. The Owner of the property is Carriage House Properties Partners LLC (Josh Levy, Manager).
- 2. Intensity of use and/or purpose of the proposed development in relation to adjacent and nearby properties and the effect thereon; provided, however, that nothing in this subsection shall be construed as granting the town council the authority to reduce residential densities below that permitted by the use regulations in article VI of this chapter. The intensity of use remains unchanged.
- 3. Ingress and egress to the property and the proposed structure thereof, with particular reference to automotive and pedestrian safety; separation of automotive traffic; traffic flow and control; provision of services and servicing of utilities and refuse collection; and access in case of fire, catastrophe or emergency. Ingress and egress remain unchanged.
- 4. Location and relationship of off-street parking and off-street loading facilities to thoroughfares and internal traffic patterns within the property, with particular reference to automotive and pedestrian safety, traffic flow and control, access in case of fire or catastrophe, and screening and landscaping. Off-street loading and internal traffic patterns will remain unchanged.

- 5. Proposed screens and buffers to preserve internal and external harmony and compatibility with uses inside and outside the property boundaries. Outdoor courtyard dining is surrounded by buildings and walls and not visible to any public space.
- 6. Manner of drainage on the property, with particular reference to the effect of provisions for drainage on adjacent and nearby properties and the consequences of such drainage on overall town capacities. Property drainage system is not affected by this proposal.
- 7. Utilities, with reference to hook-in locations and availability and capacity for the uses projected. Utilities are existing.
- 8. Recreation facilities and open spaces, with attention to the size, location and development of the areas as to adequacy, effect on privacy of adjacent and nearby.
- 9. Other standards imposed based on this chapter for the proposed use/activity are not applicable.
- 10. No changes to the architecture, including height of the buildings, is proposed, therefore this criterion is not applicable.
- 11. No changes to the architecture, including the size and bulk of the buildings is proposed, therefore this criterion is not applicable.

The scope of this project is simply to allow outdoor café seating. This request will not impact the physical configuration of buildings at the Property, nor does it affect ingress/egress, parking, loading, buffering, drainage, utilities, or recreation/open spaces, as all of those issues were addressed and approved in connection with the Existing Approvals. Furthermore, no architectural changes are proposed with this project.

- E. Variance(s) in accordance with Section 134-201(a).
 - (1) Special conditions and circumstances exist which are peculiar to the land, structure or building involved and which are not applicable to other lands, structures or buildings in the same zoning district.
 - (2) The special conditions and circumstances do not result from the actions of the applicant.
 - (3) Granting the variance requested will not confer on the applicant any special privilege that is denied by this chapter to other properties in the same zoning district under the terms of this chapter and would work unnecessary and undue hardship on the applicant.
 - (4) Literal interpretation of this chapter would deprive the applicant of rights commonly enjoyed by other properties in the same zoning district under the terms of this chapter and would work unnecessary and undue hardship on the applicant.
 - (5) The variance granted is the minimum variance that will make possible the reasonable use of the land, building or structure.
 - (6) For granting of a variance to sections 134-387 or 134-390 through 134-392, pertaining to the regulation of nonconforming uses, the following additional findings shall be made pertaining to the nonconforming use for which the variance is requested:

- a. It is the continuance of a unique hotel or residential use that has, for at least 15 years proven compatible with the surrounding uses; and
- b. Neither rezoning to a district which would allow the use, nor inclusion of the subject use as a permitted or special exception use in the district would act to achieve the preservation of the subject use without opening the possibility of the incursion of uses incompatible with the immediately surrounding area and, further, such variance shall:
 - 1. Be granted only for the continuation of the same hotel or residential use; and
 - 2. Require the applicant to submit a declaration of use limiting the utilization of the property for which the variance was granted to the same use as that existing at the time the variance was granted.
- (7) The grant of the variance will be in harmony with the general intent and purpose of this chapter, and such variance will not be injurious to the area involved or otherwise detrimental to the public welfare. In granting any variance, the town council may prescribe appropriate conditions and safeguards in conformity with this chapter. Upon granting a variance the town council may require the landowner to provide a declaration of use agreement which shall be recorded in the public records to ensure continuing compliance with the town council imposed conditions of such grants. Violation of such conditions and safeguards, when made a part of the terms under which the variance is granted, shall be deemed a violation of this chapter.

Variance Requested:

A request for Variance from the Parking requirements in Section 134-2176, to allow for 68 existing off-site supplemental parking spaces in lieu of the 121 that are required by code.

Justification for Variances Requested:

Current Town Code requires that the private club have at least one (1) parking space per four (4) club members; therefore, the total required parking for the existing 232-member private club is 62, and 53 additional spaces would be needed with the ultimate increase of club membership to 457 in three (3) years. This variance request is justified because there is no on site parking due to the legal non-conforming and landmark status of the buildings at the Property. As set forth above, Carriage House has a lease to use 68 off-site parking spaces, which exceeds the number of spaces required to accommodate the total increase in membership being requested at a rate of one parking space per four members. A variance is required because the parking spaces are not located on the Property, which is impossible given the existing configuration of the landmarked structures. Additionally, the traffic and parking memoranda produced by Kimley Horn and ARUP demonstrate the significant underutilization of the parking provided for the approved occupancy limitations at Carriage House.

F. Other - CHANGES TO THE DECLARATION OF USE

The proposed modifications to the existing declaration are shown in strikethrough format in an attachment to this submittal.

Sincerely,

James M. Crowley

EXHIBIT "A"

Ron DeSantis, Governor

Melanie S. Griffin, Secretary

STATE OF FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

DIVISION OF HOTELS AND RESTAURANTS

THE SEATING FOOD SERVICE (2010) HEREIN IS LICENSED UNDER THE PROVISIONS OF CHAPTER 509, FLORIDA STATUTES

NBR. OF SEATS: 150

CARRIAGE HOUSE CLUB LLC CARRIAGE HOUSE CLUB 264-270 S COUNTY RD

PALM BEACH FL 33480

LICENSE NUMBER: SEA6022580

EXPIRATION DATE: DECEMBER 1, 2023

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This is your license. It is unlawful for anyone other than the licensee to use this document.

Ron DeSantis, Governor

Melanie S. Griffin, Secretary



DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

DIV OF ALCOHOLIC BEVERAGES & TOBACCO

THE RETAILER OF ALCOHOLIC BEVERAGES HEREIN IS LICENSED UNDER THE

PROVISIONS OF CHAPTER 565, FLORIDA STATUTES SERIES: 4COP DUAL LICENSE

> CARRIAGE HOUSE CLUB CARRIAGE HOUSE CLUB 264-270 S COUNTY ROAD PALM BEACH FL 33480

> > LICENSE NUMBER: BEV6018074

EXPIRATION DATE: MARCH 31, 2024

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Carr, Riggs & Ingram, LLC 3300 PGA Boulevard Suite 700 Palm Beach Gardens, Florida 33410

(561) 427-0300 (561) 427-0301 (fax) CRIcpa.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

Board of Directors and Management Carriage House Club, LLC Palm Beach, Florida

We have performed the procedures enumerated below to calculate the percentage of total members of Carriage House Club, LLC that are considered Town persons as defined by the Town of Palm Beach Code Section 134-2 as of September 29, 2023. Carriage House Club, LLC's management is responsible for the calculations associated with the percentage of total members of Carriage House Club, LLC that are considered Town persons as defined by the Town of Palm Beach Code Section 134-2 as of September 29, 2023.

Carriage House Club, LLC has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose to calculate the percentage of total members of Carriage House Club, LLC that are considered Town persons as defined by the Town of Palm Beach Code Section 134-2 as of September 29, 2023. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are as follows:

1. Obtain from Carriage House Club, LLC a list of all members as of September 29, 2023 that contains the member's name, Town of Palm Beach residency status, home address, and secondary address (if applicable).

Findings: Member list was received and no exceptions were found as a result of applying the procedure.

2. Determine the definition of "Town persons" according to the Town of Palm Beach Code Section 134-2.

Findings: No exceptions were found as a result of applying the procedure. Town persons is defined as all full-time and seasonal residents as well as visitors staying at accommodations and employees working in establishments located within the town.

3. Using the list provided from 1 above, sort the list by residency status into three categories: full-time resident, seasonal resident, and non-resident.

Findings: No exceptions were found as a result of applying the procedure. Member list was sorted by residency status into three categories.

4. Compare each member's residency status with the home address and secondary address (if applicable) for full-time and seasonal members for an address within the Town of Palm Beach.

Findings: One exception was found as result of applying the procedure. One member with a residency status of full-time contained a home address and secondary address located outside the Town of Palm Beach.

- 5. From the member list in step 1 above, calculate the number of:
 - a. Total members of Carriage House Club, LLC.

Findings: No exceptions were found as a result of applying the procedure. The total number of members was 227.

b. Members of Carriage House Club, LLC that are full-time residents of the Town of Palm Beach as defined in step 2 above.

Findings: One exception was found as result of applying the procedure. See step 4 above. The revised total number of full-time residents was 119.

c. Members of Carriage House Club, LLC that are seasonal residents of the Town of Palm Beach as defined in step 2 above.

Findings: No exceptions were found as a result of applying the procedure. The total number of seasonal residents was 77.

d. Members of Carriage House Club, LLC that are non-residents of the Town of Palm Beach as defined in step 2 above.

Findings: One exception was found as result of applying the procedure. See step 4 above. The revised total number of non-residents was 31.

6. Using the calculated number of full-time and seasonal members from 5b and 5c above, calculate the percentage of total members of Carriage House Club, LLC from 5a above considered Town persons as defined in step 2 above.

Findings: No exceptions were found as a result of applying the procedure.

| Number of full-time residents | 119 |
|----------------------------------------------------------------------|-----|
| Number of seasonal residents | 77 |
| Number of full-time and seasonal residents | 196 |
| Total members of Carriage House Club, LLC | 227 |
| Percentage of Carriage House Club, LLC members that are Town persons | 86% |

We were engaged by Carriage House Club, LLC to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the calculation of the percentage of total members of Carriage House Club, LLC that are considered Town persons as defined by the Town of Palm Beach Code Section 134-2 as of September 29, 2023. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Carriage House Club, LLC and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of Carriage House Club, LLC and is not intended to be and should not be used by anyone other than this specified party.

Carr, Riggs & Ungram, L.L.C.

CARR, RIGGS & INGRAM, LLC

Palm Beach Gardens, Florida October 5, 2023 Town of Palm Beach Planning, Zoning & Building 360 S. County Rd Palm Beach, FL 33480 (561) 838-5400 www.townofpalmbeach.com Welcome

031780-0012 Melissa F 09/28/2023 11:43AM

LICENSING

CARRIAGE HOUSE CLUB LLC # of Units: 150 Unit Type: seat Approval Code 1: tsd Business Code: din11 Inspection: No Fee Exempt: No Exempt Fire Inspect: No 0003/176 00960542 Business Tax Renewal pendng 09/30/2020 2023 11.00: 00037176 1,063.50 Bus in Ju Tax 0.00 Penalty Annual Fire Inspection 0.00 Fee 1,063.50 1,063.50 Subtotal 1,063.50 Total 1,063.50 CHECK Check Number 001152 0.00 Change due

Paid by: CARRIAGE HOUSE CLUB LLC

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