GAP ANALYSIS REPORT

Terra Lago Planned Unit Development

Sixth Amendment (Proposed – May 2026)

Comprehensive Assessment of Impacts on Neighboring Communities and Existing Neighborhoods in Indiantown, Florida

Prepared for Community Review and Village Leadership
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Table of Contents

1. Executive Summary....3
2. Background and Context....4
3. Overview of the Proposed Sixth Amendment....4
Phasing Acceleration – The Core Problem....4
4. Detailed Gap Analysis from Neighboring Residents' Perspective....5
4.1 Traffic and Roadway Impacts – Insufficient and Delayed Mitigation....5
The Back-Loaded Mitigation Problem....5
4.2 School Capacity....5
4.3 Community Character and Visual Impact....6
4.4 Existing Drainage Harm – Documented Damage to Little Ranch Estates....6
4.5 Long-Term Maintenance and Accountability....7
4.6 Wildlife Corridors and Environmental Connectivity....7
4.7 Integration with Existing Indiantown Neighborhoods....7
4.8 Lighting and Light Pollution – An Unaddressed External Impact....8
5. Cumulative and Accelerated Impact Assessment....9
6. Recommendations for Strengthening Neighbor Protections....9
Immediate Actions Required....9
Traffic Recommendations....9
Lighting Recommendations....9
School and Infrastructure Recommendations....9
Character and Integration Recommendations....10
7. Conclusion and Call to Action....10

1. Executive Summary

The proposed Sixth Amendment to the Terra Lago Planned Unit Development represents one of the most consequential shifts in the project's history — a clear and aggressive move to accelerate development timelines while leaving critical protections for neighboring communities lagging behind. This amendment does not merely tweak administrative details. It fundamentally alters the balance between the developer's desire for faster build-out and the Village's obligation to protect existing residents from the external costs of that growth.

The most compelling and urgent evidence that the current PUD framework is already failing neighboring communities is not hypothetical or future-oriented. It is happening right now. Residents of Little Ranch Estates, located immediately north of the Terra Lago project boundary, have documented severe and unprecedented impacts from the owner's existing site work. Local ponds that have sustained fish and wildlife populations for over seventy years sit directly on the shared border with the PUD. These ponds have been significantly depleted, resulting in fish kill levels never before observed in the living memory of long-time residents. This is not minor temporary disturbance or normal construction impact. It is documented, ongoing ecological damage directly attributable to current activity on the Terra Lago site.

This existing harm to Little Ranch Estates must serve as the baseline reality against which any proposed acceleration is judged. The Sixth Amendment seeks to move multiple major residential phases forward by one to two years. Doing so would compress the already inadequate timeline for mitigation, increase the intensity of construction and early occupancy impacts on neighboring properties, and send a clear message that the Village is willing to prioritize developer timelines over the protection of residents who are already suffering measurable harm. Accelerating this project while the ponds on its northern border continue to experience fish kills would compound an existing injustice rather than correct it.

Beyond the immediate crisis at Little Ranch Estates, the PUD agreement contains multiple structural gaps that leave neighboring communities exposed. Traffic mitigation remains heavily back-loaded, with many required signals and road improvements only triggered after hundreds of peak-hour trips are already occurring on Warfield Boulevard and local roads. School capacity protections rely on impact fees and a Letter of No Objection without any guarantee of near-term relief for existing families. The agreement contains no meaningful standards for outdoor lighting or light pollution, leaving residents unprotected from increased nighttime glare as the project builds out. Long-term maintenance responsibility is delegated to private entities with limited Village oversight. And the development continues to function primarily as a self-contained enclave rather than an integrated addition to the broader Indiantown community.

The cumulative effect of these gaps, combined with the proposed acceleration of several large residential phases, creates an unacceptable burden on neighboring residents. The Sixth Amendment does not strengthen protections to match the increased speed and intensity of development it enables. Instead, it asks existing communities to absorb more impacts, sooner, with the same inadequate safeguards that have already proven insufficient to prevent harm at Little Ranch Estates.

The Village of Indiantown has both the legal authority and the moral responsibility to reject this amendment in its current form. At minimum, any approval must be conditioned on immediate and meaningful corrective action for the documented damage to Little Ranch Estates, including restoration measures and stronger interim controls on current site work. The Village should also require front-loaded traffic and infrastructure improvements, enforceable outdoor lighting standards, and binding commitments on school capacity before any further acceleration is considered.

The choice before the Village Council and Planning, Zoning and Appeals Board is clear. They can approve an amendment that rewards speed at the expense of neighboring communities already

experiencing harm, or they can demand a project that corrects existing failures and provides genuine protection going forward. The current proposal fails that test.

2. Background and Context

The Terra Lago PUD (originally approved as the Indiantown DRI) encompasses approximately 806 acres north of SW Warfield Boulevard and east of SW Allapattah Road. It has been in various stages of planning and amendment since its original approval by Martin County in 2008. The Village of Indiantown assumed regulatory authority upon its incorporation in 2017.

The property covers approximately 806 acres located generally north of SW Warfield Boulevard (SR 710) and east of SW Allapattah Road. The approved development program includes a mix of single-family homes, townhomes, multi-family units, commercial space, and recreational amenities. Under the proposed Sixth Amendment, the maximum residential unit count stands at approximately 2,500.

Previous amendments (particularly the Fourth and Fifth) focused on updating the agreement to reflect Village jurisdiction, adjusting open space requirements, refining access points, and addressing technical matters. These earlier changes were generally viewed as balanced or slightly protective of community interests. The proposed Sixth Amendment marks a clear departure by prioritizing a significantly accelerated development timetable.

3. Overview of the Proposed Sixth Amendment

The Sixth Amendment primarily revises Exhibit E (Timetable of Development) and Exhibit F (Special Conditions). While Exhibit F contains important technical updates, the most consequential and impactful changes are in the revised phasing schedule.

Phasing Acceleration – The Core Problem

The following table summarizes the most significant changes to the development timetable:

Phase	Previous Submittal	Sixth Amendment	Impact on Neighbors
Ph 2	April 2027	April 2026	1 year earlier – more traffic sooner
Ph 3	April 2028	April 2027	1 year earlier – cumulative pressure
Ph 4	April 2030	April 2028	2 years earlier – significant acceleration
Ph 5	April 2032	April 2030	2 years earlier – long-term impact compressed

This acceleration is occurring against a backdrop of already documented harm to neighboring properties. The compressed timeline means that traffic, drainage, school, character, and light pollution impacts will hit surrounding neighborhoods earlier and with greater intensity, while many mitigation measures remain tied to thresholds that will now be reached faster.

4. Detailed Gap Analysis from Neighboring Residents' Perspective

The following sections provide an in-depth examination of the most significant gaps between what the PUD provides and what neighboring communities require for the protection of their quality of life, property, and public services.

4.1 Traffic and Roadway Impacts – Insufficient and Delayed Mitigation

Traffic is consistently identified by neighboring residents as the single greatest concern. The PUD contains extensive language regarding signal warrants, turn lanes, and a proportionate share contribution for SR 710 widening. However, the structure of these requirements creates a fundamental gap in protection for existing road users.

The Back-Loaded Mitigation Problem

Key traffic conditions state that no building permits for development generating more than specific peak-hour trip thresholds shall be issued until signal warrant studies are conducted and, if warranted, signals installed. This structure has several critical flaws:

- The 502 AM / 551 PM / 620 PM peak hour trip thresholds mean hundreds of daily vehicle trips will already be occurring on Warfield Boulevard and local roads before any obligation to install signals is triggered.
- The Sixth Amendment's acceleration of Phases 2, 3, and 4 means these thresholds will be reached much earlier in calendar time than originally planned.
- There is no mechanism for interim traffic management, temporary signals, or road improvements during the period between initial impact and permanent mitigation.
- The $213,845 proportionate share payment for SR 710 widening is modest relative to project scale and is not required until over 1,200 PM peak hour trips are generated — well into build-out.

The practical result is that neighboring residents will experience increased congestion, longer travel times, higher accident risk at unsignalized intersections, and accelerated wear on local roads during the most intense periods of construction and early occupancy — with mitigation arriving only after significant damage has already occurred.

4.2 School Capacity

The PUD requires a Letter of No Objection from the Martin County School Board and payment of impact fees before residential building permits. While these are standard requirements, they fall far short of providing meaningful protection for families already living in the Indiantown area.

- Impact fees are collected over time and do not create immediate additional classroom capacity or teacher positions.
- No school site is included within the Terra Lago master plan. All new students will be accommodated in existing district facilities.
- Existing Indiantown-area students may face larger class sizes, increased pressure on facilities, and potentially longer bus routes as Terra Lago's student population grows — particularly under the accelerated phasing schedule.

4.3 Community Character and Visual Impact

Terra Lago will transform the character of the area from one retaining significant rural and semi-rural qualities to a large-scale suburban master-planned community. While the PUD includes perimeter buffer and landscaping requirements, these measures are insufficient to fully mitigate the external impacts of this transformation on neighboring properties.

- The scale of the development (up to 2,500 units) represents a significant intensification of land use at the edge of existing neighborhoods.
- Perimeter buffers are average-width standards unlikely to fully prevent visual, noise, and lighting impacts along sensitive edges.
- Nighttime lighting from streets, homes, and commercial areas will alter the dark-sky character currently enjoyed by nearby residents.
- The internal focus of amenities creates a sense of separation rather than integration with the existing community fabric of Indiantown.

4.4 Existing Drainage Harm – Documented Damage to Little Ranch Estates

Perhaps the most compelling evidence of the inadequacy of current protections is not hypothetical — it is already happening. Residents of Little Ranch Estates, located immediately north of the Terra Lago project, have experienced severe and unprecedented impacts from the owner's existing site work.

Local ponds situated directly on the border with the PUD have been significantly depleted. These ponds, which have sustained fish and wildlife populations for over 70 years, have reached fish kill levels never before observed in the living memory of long-time residents. This is not a minor or temporary disturbance — it represents a fundamental failure of the current drainage and site management regime to prevent off-site harm.

This ongoing damage demonstrates several critical weaknesses in the PUD framework:

- Current site work is already causing measurable and severe harm to adjacent properties, indicating that existing erosion control, dewatering, and stormwater management practices are insufficient to prevent off-site impacts.
- The agreement's reliance on private entities (future HOA/CDD) for long-term maintenance creates unacceptable risk, as even current construction-phase activity is proving difficult to control.
- Neighbors have already suffered irreversible ecological damage (fish kills) with limited practical recourse under the current regulatory and agreement structure.
- The proposed acceleration of development phases will only increase the intensity and duration of these impacts unless far stronger interim protections and enforcement mechanisms are put in place immediately.

The fact that significant, documented harm is already occurring before the major residential phases have even begun is a clear warning sign. Approving an accelerated schedule without first addressing these existing failures would compound the damage to neighboring communities and represent a serious failure of regulatory oversight.

4.5 Long-Term Maintenance and Accountability

Long-term responsibility for stormwater systems, landscaping, and common areas is assigned primarily to the HOA and Community Development District. While the Village retains limited intervention rights (particularly regarding the main conveyance ditch), these mechanisms are largely reactive. Neighbors who experience ongoing drainage or maintenance failures will have limited practical recourse beyond complaint-driven code enforcement.

This structure is especially problematic given the already documented drainage harm occurring during the current construction phase. If the owner's current activity is already causing fish kills in adjacent ponds, there is little reason to believe that long-term maintenance by a future HOA or CDD will be more protective of neighboring properties without significantly stronger accountability measures.

4.6 Wildlife Corridors and Environmental Connectivity

The PUD includes conservation easements, wetland buffers, upland preservation areas, and specific protections for listed species. These on-site measures are generally positive. However, from a landscape perspective, significant gaps remain. Preserved areas are largely internal and do not establish meaningful wildlife corridors connecting to broader regional habitat networks. The documented harm to border ponds further degrades the ecological function of the surrounding landscape.

4.7 Integration with Existing Indiantown Neighborhoods

A recurring concern among neighboring residents is that Terra Lago is being developed as a separate, self-contained community rather than as an integrated part of Indiantown. While the PUD requires several external road connections, the design and amenity structure reinforces separation rather than connection. Internal trails and recreational amenities primarily serve Terra Lago residents, and pedestrian/bicycle connectivity to surrounding neighborhoods remains limited compared to the robust internal multi-modal network.

4.8 Lighting and Light Pollution – An Unaddressed External Impact

Another significant gap in the PUD agreement is the complete absence of meaningful controls on outdoor lighting and light pollution. Neither the Fourth Amendment nor the Sixth Amendment contains any substantive language addressing lighting standards, light trespass, or protection of dark skies.

As Terra Lago develops — particularly with the accelerated phasing proposed in the Sixth Amendment — neighboring residents can expect a substantial increase in nighttime lighting from streets, parking areas, homes, commercial buildings, and amenities. This will have direct negative impacts on quality of life for residents in Little Ranch Estates and other adjacent neighborhoods who currently enjoy relatively dark skies, on wildlife and ecological function in and around the preserved wetland and upland areas, and on the rural and semi-rural character that many long-time Indiantown residents value.

The PUD contains no requirements for shielded or full cut-off fixtures, limits on light trespass onto neighboring properties, curfews on lighting after certain hours, or specific protections for preserve areas and buffers. This omission leaves neighboring residents with no enforceable protections against increased nighttime glare as the project builds out. It is a notable and easily addressable gap that should be corrected before any further approvals are granted.

5. Cumulative and Accelerated Impact Assessment

When viewed in isolation, individual gaps in the PUD may appear manageable. However, when considered cumulatively and in light of the accelerated phasing proposed in the Sixth Amendment — combined with the already documented harm to Little Ranch Estates — the combined effect on neighboring communities is substantially more severe.

The simultaneous acceleration of multiple phases means that traffic, school, drainage, character, lighting, and light pollution impacts will arrive in a compressed timeframe. This compression reduces the community's ability to adapt, increases the intensity of short-term disruption, and raises the likelihood that mitigation measures will lag behind actual impacts. The ongoing fish kills in border ponds demonstrate that even current activity levels are causing unacceptable off-site harm. Accelerating development without first correcting these failures will compound the damage.

6. Recommendations for Strengthening Neighbor Protections

The Village Council and Planning, Zoning and Appeals Board have the authority and responsibility to require meaningful improvements to the proposed Sixth Amendment before granting approval. The following recommendations are offered as priority actions:

Immediate Actions Required

1. Investigate and require immediate corrective action for the ongoing drainage impacts to Little Ranch Estates ponds, including restoration measures, stronger interim controls on current site work, and monitoring protocols to prevent further fish kills or ecological damage.
2. Reject or substantially condition the accelerated phasing schedule proposed in the Sixth Amendment until existing drainage harm is fully addressed and stronger interim protections are secured.

Traffic Recommendations

3. Require completion of key signal and intersection improvements at Warfield Boulevard and major access points earlier in the phasing sequence, independent of trip count triggers.
4. Mandate an interim traffic management plan to address impacts during the period between initial occupancy and permanent mitigation installation.

Lighting Recommendations

5. Require the addition of meaningful outdoor lighting standards, including requirements for shielded/full cut-off fixtures, limits on light trespass onto neighboring properties, and protections for preserve areas and buffers.
6. Consider establishing lighting curfews or reduced lighting levels after certain hours near the perimeter of the development.

School and Infrastructure Recommendations

7. Require the developer to enter into a binding school capacity agreement with the Martin County School Board that includes specific, measurable commitments to support facility expansion or operational relief concurrent with major residential phases.
8. Strengthen long-term maintenance accountability with annual public reporting requirements from the HOA/CDD and clear Village intervention triggers with cost recovery mechanisms.

Character and Integration Recommendations

9. Require enhanced perimeter buffering and screening standards along high-visibility edges with specific performance standards for visual screening, noise attenuation, and light trespass mitigation.
10. Mandate meaningful pedestrian and bicycle connections between Terra Lago and existing Indiantown neighborhoods.

7. Conclusion and Call to Action

The Terra Lago PUD Sixth Amendment, as currently proposed, fails to adequately protect the interests of neighboring communities and existing Indiantown residents. The documented fish kills in ponds bordering Little Ranch Estates are not a future risk — they are present, ongoing evidence that the current framework is already causing unacceptable harm.

Accelerating development without first correcting these existing failures and strengthening protections will only compound the damage. The Village of Indiantown has both the legal tools and the moral responsibility to demand better. The proposed amendment should not be approved in its current form.

Village leadership should insist on meaningful revisions that: (1) immediately address and remediate the documented drainage harm to Little Ranch Estates, (2) front-load critical infrastructure improvements, (3) add enforceable lighting standards to protect neighboring residents and dark skies, (4) strengthen accountability mechanisms, (5) improve integration with the existing community, and (6) ensure that the pace of development does not outstrip the community's ability to absorb its impacts without degrading the quality of life for those who already call Indiantown home.

The choice before the Village is clear: approve a development that prioritizes speed and private profit while externalizing harm onto existing residents, or require a project that truly serves the long-term interests of the entire Indiantown community — new residents and existing neighbors alike.

— End of Report —