

CPA 21-11, Waterside Text,
12/23/2024 Application
Materials



December 23, 2024

HAND DELIVERY

Jenna Knobbe, AICP, Senior Planner
Martin County Growth Management Department
2401 S.E. Monterey Road
Stuart, FL 34996

**RE: CPA #21-11, Waterside Comprehensive Plan Text Amendment – Response to Staff
Analysis Comments Dated September 5, 2024 (Our Ref. #23-050)**

Dear Jenna:

Please find enclosed a supplemental application fee check in the amount of \$500 made payable to the Martin County Commission and an itemized response to the staff analysis and relevant comments contained in the above-referenced staff report. Please consider these responses and the exhibits listed below, which include previously submitted documents and revised application materials, in preparation of a final staff report and recommendation for the next available Local Planning Agency public hearing and County Commission transmittal public hearing.

List of Exhibits:

- Exhibit 1: Adjacent Non-Agricultural Development Map (previously submitted)
- Exhibit 2: Letter Dated October 15, 2024 from Stearns, Weaver, et al
- Exhibit 3: Letter Dated March 18, 2024 from Stearns Weaver, et al
- Exhibit 4: Updated Text Amendment
- Exhibit 5: Cover Letter prepared by GAI Consultants, Inc.– Community Solutions Group
- Exhibit 6: Updated Residential Capacity Analysis (previously submitted)
- Exhibit 7: Response to Traffic memo Dated August 16, 2024
- Exhibit 8: Response to Utility memo Dated August 19, 2024

In brief, our application to expand the Primary Urban Service District (PUSD) follows the development of 250 acres of Industrial land use within the adjacent South Florida Gateway PUD and Martin County's future operations center, which are located within a Freestanding Urban Service District. The expansion of the PUSD includes converting the existing Freestanding Urban Service District to Primary Urban Service District and the addition of 396 acres of Agricultural land use that is surrounded by the St. Lucie Canal, major roads, urban development and non-agricultural land uses. (See previously submitted "Adjacent Non-Agricultural Development" map enclosed as Exhibit "1").

The additional 396 acres of Agricultural land is proposed to be changed to Low Density Residential land use under a companion Future Land Use Map (FLUM) Amendment and is restricted by this text amendment to a maximum allowable density of 2.7 units per acre (1,050 units). The expansion of the PUSD and conversion of land use from Agricultural to Low Density Residential is needed to address the County's deficit of residential lands to meet future housing needs and to provide housing in close proximity to the surrounding employment centers.

The applicant is aware that the County is currently proposing changes to its Comprehensive Plan through the EAR amendment process. The applicant's legal counsel recently submitted comments because the current EAR amendment proposal is not in compliance as defined by Section 163.3184(1)(b), F.S. (See letter to the Martin County Board of Commissioners dated October 15, 2024 from Stearns, Weaver, et al enclosed as Exhibit 2.) A similar analysis was submitted to the County as a part of this application, which is enclosed here again for your convenience. (See letter dated March 18, 2024 enclosed Exhibit "3".) In summary, the County's current EAR Amendment proposal does not comply with state law, and the amendments proposed by this application are in part crafted to ensure the Comprehensive Plan complies with the law.

With this understanding, please note the following "**RESPONSES**" (highlighted in **red**) to the staff analysis comments (provided in **bold type**) below. Please note the existing Comprehensive Growth Management Plan text language in the staff comments have been provided in ***bold italics***. Please refer to the Staff Analysis dated September 5, 2024 for the comments in their entirety.

APPLICANT REQUEST:

This is an application for a text amendment changing numerous policies and figures found in Chapter 1 Preamble, Chapter 4 Future Land Use Element, and Chapter 11 Potable Water Services Element/10 Year Water Supply Facilities Work Plan. The chapters of the Comprehensive Growth Management Plan (CGMP) and policies/figures proposed for amendment are listed below.

Chapter 1, Preamble:

- Section 1.7.A, *Population estimates*
- Section 1.7.B, *Housing unit demand projection*
- Section 1.7.C, *Residential capacity calculations*
- Section 1.7.D, *Peak population in residential housing units for the unincorporated area.*
- Section 1.7.E, *Peak and weighted average population for Level of Service determination (LOS).*

RESPONSE: Agree.

Chapter 4, Future Land Use Element:

- Policy 4.1B.2, *Analysis of availability of public facilities*
- Policy 4.1D.2, *Population technical bulletin*
- Policy 4.1D.3, *Future residential housing unit demand*
- Policy 4.1D.4, *Distribution of housing unit demand*
- Policy 4.1D.5, *Residential capacity analysis*
- Policy 4.1D.7, *Active residential tracking system*
- Policy 4.7A.3.(9), *Exceptions to location in the Primary Urban Service District*
- Policy 4.7A.3.1.(3), *Exceptions to water and sewer service within the Primary Urban Service District*
- Policy 4.7A.14.(9), *Allowable development outside the Primary Urban Service District*
- Policy 4.13A.10, *Industrial development*
- Figure 4-2 *Urban Service Districts*

RESPONSE: Agree. However, the amendment/deletion of Policy 4.1D.7, *Active residential tracking system* has been withdrawn. (See updated **TEXT** amendment enclosed as Exhibit "4".)

Chapter 11, Potable Water Services Element/10 Year Water Supply Facilities Work Plan:

- **Figure 11-1, Areas Currently Served by Regional Utilities**
- **Figure 11-2, Potential Service Areas**

RESPONSE: Agree.

STAFF ANALYSIS (beginning on page 7 of staff report)

1.A - Expansion of Primary Urban Service District Boundary. One request in this text amendment application is to expand the boundaries of the Primary Urban Service District to encompass 646 total acres. This acreage is broken up between approximately 396 acres of land that has a concurrent Future Land Use Map (FLUM) application to amend the future land use from Agricultural to Low Density Residential (CPA 21-12), and approximately 250 acres of Industrial future land use that is currently within a Freestanding Industrial Urban Service District.

The proposed expansion of the Primary Urban Service District is illustrated in Figure 4 on the previous page of this report. Figure 4 of this report is the applicant's proposed amendment to the existing Figure 4-2 (shown in Figure 3 above) which would expand the Primary Urban Service District to encompass 646 total acres. The expansion of the Primary Urban Service District boundary is shown in the red and black boundary lines in Figure 4 of this report. The pink land area shown in both the existing and proposed Figures 4-2 designate land within the Primary Urban Service Boundary.

The proposed amendment to Figure 11-1 above is another part of the request by the applicant to expand the Primary Urban Service District to encompass 646 total acres. The expansion of the Primary Urban Service District to encompass the proposed Low Density Residential land (346 acres, CPA 21-12) and adjacent Industrial land of the South Florida Gateway PUD (250 acres) is shown in the blue and black boundaries on the proposed Figure 11-1.

RESPONSE: Agree. However please note the typo above (346 acres should be 396 acres).

An additional request as part of the proposed expansion of the Primary Urban Service District boundary is to amend Figure 11-2 (as shown above) to encompass the subject 646 total acres. As stated above with the proposed amendment to Figure 11-1, the proposed expansion of the Primary Urban Service District in Figure 11-2 is shown with the blue and black boundaries for the proposed Low Density Residential land (396 acres, CPA21-12) and the adjacent Industrial land in the South Florida Gateway PUD (250 acres).

1.B - Elimination of Freestanding Industrial Urban Service District. Another request in this application is to delete the same language from Policy 4.7A.3(9); Policy 4.7A.3.1(3); Policy 4.7A.14(9); and Policy 4.13A.10 in Chapter 4, Future Land Use Element. This language pertains to the Industrial land use within the Freestanding Urban Service District known as the South Florida Gateway PUD. The deletion of the below language would result in the elimination of the Freestanding Industrial Urban Service District, which is needed for consistency if this same land area becomes part of the expansion of the Primary Urban Service District. As stated previously, this land within the Freestanding Urban Service District currently receives urban services, including water and sewer. If the Primary Urban Service District boundary is expanded to include the 250 acres of Industrial land, the reclassification of the Industrial land from Freestanding USD to Primary USD would not impact the availability of public services currently available to the South Florida Gateway PUD.

RESPONSE: Agree. The changes to these policy text provisions are needed to maintain internal consistency.

“Policy 4.7A.3. Exceptions to location in the Primary Urban Service District. All future development of a use or intensity that requires public urban facilities, including water and sewer, will be permitted only in the Primary Urban Service District. The only exceptions are for the currently approved developments below:

~~(9) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. Number 1153 and Ordinance 1210, less and except property described in Ordinance 1208.”~~

“Policy 4.7A.3.1. All future development of a use or intensity that requires public urban facilities, including water and sewer, will be permitted only within the Primary Urban Service District, except the following facilities may be served with water and sewer service:

~~(3) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. Number 1153 and Ordinance 1210, less and except property described in Ordinance 1208.”~~

“Policy 4.7A.14. Allowable development outside the Primary Urban Service District. The following forms of development are recognized exceptions to the general prohibitions on development outside of the Primary Urban Service District set forth in Policies 4.7A.1. through 4.7A.13.:

~~(9) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. Number 1153 and Ordinance 1210, less and except property described in Ordinance 1208.”~~

“Policy 4.13.10A. Industrial development. The FLUM allocates land resources for existing and anticipated future industrial development needs. The allocation process gives high priority to the industry’s need for land accessible to rail facilities, major arterials or interchanges, labor markets and the services of the Primary Urban Service District (Figure 4-2). Industrial development includes both Limited Impact and Extensive Impact Industries. Limited Impact Industries include research and development, light assembly and manufacturing. Extensive Impact Industries include heavy assembly plans, manufacturing/processing plants, fabricators of metal products, steam/electricity co-generation plants and uses customarily associated with airports.

~~The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance Number 1153 and Ordinance 1210, less and except property described in Ordinance 1208, is hereby established as a Freestanding Urban Service District.”~~

If the Primary Urban Service District is expanded to include the 250 acres of Industrial land use in the Freestanding Urban Service District, the above exceptions will no longer be needed. The application materials for CPA 21-11 were revised to propose deleting the above changes, originally adopted December 5, 2023, for internal consistency.

RESPONSE: Agree

Section 2. Proposed Sub-Area Policies

Another request is to add sub-area development policies as shown in (6) to Policy 4.1B.2. Subsections (1), (2), (3), (4) and (5) identify development restrictions on specific parcels of land in unincorporated Martin County. These restrictions are requested by applicants seeking a

concurrent amendment to the Future Land Use Map. The restrictions in subsection (2) below are applicable to the 250 acres of Industrial land known as the South Florida Gateway PUD shown on Figures 1 and 2 above. Amendments to the restrictions in subsection (2) were adopted by the Board of County Commissioners on December 5, 2023 and are shown in bold text. There are no requested amendments to subsection (2) in the application materials. This staff report is reviewing the text proposed in subsection (6).

RESPONSE: Agree

(6) The following restrictions shall be applied to the tract of real property designated as Low Density Residential on the Future Land Use Map and described in Ordinance No. XX

Staff analysis: If the Future Land Use Map amendment proposed in CPA 21-12 is adopted, the Ordinance number would replace the XX shown in the proposed subsection (6). In that way the legal description attached to the ordinance would describe the approximately 396 acres subject to the Future Land Use Map amendment.

RESPONSE: Agree

“(a) Residential units shall be limited to a maximum of 1,050 units.”

Staff analysis: Adoption of subsection (6)(a) would alter the analysis of CPA 21-12, the proposed Future Land Use Map amendment because the maximum number of units would decrease from 1,984 units to a maximum of 1,050 units on approximately 396 acres (2.7 units per acre). The proposed 1,050 maximum residential units is below the maximum that would be allowed with the requested Low Density Residential future land use designation at five (5) units per acre over approximately 396 acres.

RESPONSE: Agree

“(b) Prior to the issuance of the 100th building permit, a monetary contribution of \$1,000 per residential unit shall be donated to the Martin County Community Land Trust to address variable housing needs throughout the County.”

Staff analysis: The Martin County Community Land Trust was only recently created. Administrative processes for implementing item (6)(b) above would need further consideration.

RESPONSE: The Martin County Community Land Trust is now fully operational and has accepted monetary donations as PUD public benefits.

“(c) All future applications for development approval shall be processed as a Planned Unit Development (PUD).”

Staff analysis: The proposed subsection (6)(c) would allow development on the 396 acres in CPA 21- 12 to comply with Policy 4.13.10. which states “Industrially designated areas are not generally adaptive to residential use, and they shall not be located in areas designated for residential development unless planned for a mixed-use development allowed under Goal 4.3 or in a large-scale PUD.”

As discussed above, Subsection (2) is applicable to the 250 acres of Industrial land adjacent to the approximately 396 acres proposed for residential development. Subsection (2)(f) prohibits Industrial traffic from direct access to SW 96th St. At present, that is easily accomplished. It is not clear how industrial traffic will be prohibited from direct access to SW 96th St. if a road

network connects the 396 acres of residential development and the 250 acres of industrial development.

RESPONSE: The PUD application process requires a master site plan that must provide buffering and land use transition techniques that ensure compatibility with the adjacent industrial uses and demonstrate how industrial traffic will be prohibited from internal access through the project to SW 96th Street.

“(d) The owner/developer shall plan and appropriately fund public facilities consistent with Policy 14.1B.2, which requires that future developments pay the full cost of capital facilities needed to address the impacts of such development. This shall include an amendment to the Capital Improvements Element, if needed, and a PUD Agreement and/or Development Agreement that addresses public facilities, infrastructure, and the timing of development.”

Staff analysis: The proposed subsection (6)(d) requires the future development to pay the full cost of capital facilities needed to address the impacts of the proposed development, consistent with Policy 14.1B.2, Chapter 14, Capital Improvements.

RESPONSE: Agree. The added text acknowledges that future development on the property will be responsible for making capital improvements and amendments to the Capital Improvements Element, if needed, to ensure adequate public facilities including traffic and utility capacity, are provided concurrent with development impacts.

Section 3. Policy 4.7A.7 – Primary Urban Service District Expansion Criteria

Any proposed alteration of the Primary Urban Service District (as depicted on Figure 4-2 Urban Service Districts) must be reviewed for compliance with the Comprehensive Plan text quoted below. Policy 4.7A.7 provides factors to be contemplated when the Board of County Commissioners considers any alteration of the PSD.

“Policy 4.7A.7. Allowed alterations to the Primary Urban Service District boundary. The Primary Urban Service District boundaries delineated on Figure 4-2 (Urban Services District Boundary Map) are intended to separate urban from nonurban areas. The land uses and intensity of development permitted in the Primary Urban Service District and development in the district must have all public facilities and services at adopted LOS standards. Therefore, during consideration of any expansion, creation or contraction of these boundaries through the plan amendment process, the Board of County Commissioners must find that the requested alteration to the Primary Urban Service District boundary will:

(1) Not create any internal inconsistency with other elements of the adopted CGMP;

Staff analysis of Policy 4.7A.7(1): The proposed changes to Policy 4.1D.3(1) and Section 1.7.B(1) are not consistent with one another and would therefore create internal inconsistency within the CGMP. The proposed policy changes and staff analysis are outlined in Section 5.B on page 19 of this staff report. The application materials should be revised to ensure that any proposed changes do not create internal inconsistency with other elements of the adopted CGMP. This criterion has not been met.

RESPONSE: The two policies are internally consistent. Policy 4.1D.3(1) addresses only the calculation/projection of future **occupied** housing units based on the projected percentage increase in population. Policy 1.7.B(1) addresses the calculation/projection of **total** housing units based on the same calculation as Policy 4.1D.3(1) for occupied housing units plus the percent increase in vacant housing units. Policy 1.7.B(1) incorporates the calculation from Policy 4.1D.3(1). However, we

concur that it would be appropriate to amend Policy 4.1D.3(1) to include the same language as proposed Section 1.7.B(1). (See updated TEXT Amendment enclosed as Exhibit "4".)

(2) Not result in incompatibilities with adjacent land uses;

Staff analysis of Policy 4.7A.7(2): The surrounding lands and the proposed 396 acres of Low Density Residential land (CPA 21-12) will be adjacent to the existing 250 acres of Industrial land known as the South Florida Gateway PUD, which could cause compatibility problems. Policy 4.13A.10. of the Comprehensive Plan states:

"Industrially designated areas are not generally adaptive to residential use, and they shall not be located in areas designated for residential development unless planned for a mixed-use development allowed under Goal 4.3 or in a large-scale PUD."

The sub area policies proposed by the applicant will require a PUD zoning district and site plan for the 396 acres of residential development. Please see the analysis of *Policy 4.1B.2.* above. A PUD may be used to ensure compatibility is considered during site design and site plan approval.

RESPONSE: Agree. The adjacent Industrial lands have been designed with physical buffers including lakes, berms and landscape buffers in anticipation of future residential use on the subject property. The 396-acre subject property is large enough to provide additional buffering and transitional uses to ensure compatibility with the adjacent Industrial uses.

In addition, prior to the sale of the 30-acre Industrial parcel to Martin County, the Seller required, and the County agreed to the following condition in the purchase and sale agreement that is applicable to SW Waterside Way, which is designed to be a major access road into the proposed residential land use:

"The County agrees to buffer the Property from SW Waterside Way with a 6-foot tall solid wall on top of a 3-foot tall berm and with landscaping in accordance with the Type 3 landscape buffer requirements set forth in Section 4.663.B.6.c., Land Development Regulations, Martin County, Florida (2014)."

However, expanding the Primary Urban Service District will create an enclave for the five existing single-family lots adjacent to the property's northeast boundary and SW 96th Street. These five properties would then be surrounded on all four sides by the Primary Urban Service District, all while having an Agricultural future land use designation, which is incompatible with the densities and intensities permitted within the Primary Urban Service District. Additionally, there are six properties on the project's east boundary that are directly adjacent to SW Kanner Highway. These six properties would also be surrounded on three sides by Primary Urban Service District with the proposed extension. Florida Statute Section 171.046 states "The Legislature recognizes that enclaves can create significant problems in planning, growth management, and service delivery, and therefore declares that it is the policy of the state to eliminate enclaves." The requested expansion of the Primary Urban Service District would facilitate the creation of an enclave within the Primary Urban Service District boundaries, which is contradictory to efficient planning practices that seek to eliminate or, at a minimum, not create enclaves. This criterion has not been met.

RESPONSE: Disagree. Staff's "enclave" analysis is misplaced and focused on the issue of efficiency in providing services, which is a different consideration than compatibility with adjacent uses. The PUSD allows urban uses near the PUSD boundary that inherently require proximity to lower density,

adjacent uses located outside of the PUSD. Ranchettes located outside of the PUSD are inherently compatible with low density, urban uses located in the PUSD. Moreover, compatibility is assured through the use of PUD master site planning transitioning and buffering techniques.

The surrounding Agricultural parcels on SW 96th Street and SW Kanner Highway are occupied by single family homes with homestead exemptions. The 5 contiguous parcels on SW 96th Street do not support agricultural uses or meet the minimum 20-acre minimum lot size required under the Agricultural land use category. The Agricultural Ranchette parcels along SW Kanner Highway are located between the Primary Urban Service District to the north and the Freestanding Urban Service District to the south. These properties are already afforded most urban services by their direct adjacency to the urban service districts, yet they are denied connection to adjacent water and sewer lines and required to use individual wells and septic tanks to the detriment of adjacent waterways and wetlands. (See “Adjacent Non-Agricultural Development” map enclosed as Exhibit 1.)

The County should recognize these unique characteristics and initiate an amendment to include these properties within the Primary Urban Service District. Including these properties will allow connection to existing water and sewer lines and reduce the negative impacts from wells and septic tanks on the headwaters of Roebuck Creek.

Finally, section 171.046 is not applicable, and it would be inconsistent with the Comprehensive Plan for the County to apply it in this circumstance. This section applies only to the annexation of land from counties into municipalities. Nothing in the text of this section—or Chapter 171—allows this statute to be applied in this analysis. It does not appear that staff has any other legal justification for the creation of an enclave argument that is not a criterion for the analysis of this application.

(3) Not adversely impact environmental, natural, historical or archaeological resources, features or systems to a degree that is inconsistent with this Plan;

Staff analysis of Policy 4.7A.7(3): The proposed expansion of the Primary Urban Service District on the total 646 acres will not impact environmental, natural, historical or archaeological resources because the land has been commercially farmed for decades. This criterion has been met.

RESPONSE: Agree. In fact, the environmental conditions on the subject property and water quality discharge into Roebuck Creek and the St. Lucie Canal will be significantly enhanced if the subject property is included in the PUSD due to wetland protection, stormwater requirements, native plantings and water quality standards that do not otherwise apply to agricultural uses.

(4) Be consistent with Goal 4.9 relating to appropriate residential land use capacities;

Staff analysis of Policy 4.7A.7(4): The following analysis is applicable to the approximately 396 acres where residential development is proposed for an expanded Primary Urban Service District. Goal 4.9 below requires a variety of choices in housing types and the specific Policy 4.9A.1. focuses on the siting and location of housing types.

The proposed location for residential development may be considered “suitable” based upon the location adjacent to the Primary Urban Service District and proximity to employment, cultural centers, fire and police protection and the avoidance of adverse impacts to natural resources. However, impacts on other capital facilities such as the road network and utility capacity must be addressed to comply with Policy 4.9A.1., CGMP. The applicant has proposed

in the sub-area policies in Policy 4.1B.2 to amend the Capital Improvements Element, if needed, to ensure that the future development pays the full cost of capital facilities needed to address the impacts of such development. This criterion has been met.

RESPONSE: Agree. The proposed residential application is emphatically consistent with Comprehensive Plan Policy 4.9A.1, which states the following:

“Policy 4.9A.1. Suitable siting of residential development. Residential development shall be located in areas that are suitable in terms of efficient land use planning principles regarding the location and design of units; projected availability of service and infrastructure capacity; proximity and accessibility to employment, commercial and cultural centers and fire and police protection; avoidance of adverse impacts to natural resources; and continued viability of agricultural uses. The guideline for determining proximity is that commercial and employment opportunities are within 7.5 miles or 20 minutes.”

- (5) *Demonstrate that reasonable capacity does not exist on suitable land in the existing Primary Urban Service District for the 15-year planning period. For the purpose of this subsection, "reasonable" means available for development from the standpoint of environmental concerns, efficient use and expansion of public facilities and services, or availability of development sites in relationship to the projected needs of the population;*

Staff analysis of Policy 4.7A.7(5): The following analysis is applicable to the approximately 396 acres where the proposed expansion of the Primary Urban Service District would accommodate residential development. A Residential Capacity Analysis prepared by GAI Consultants' Community Solutions Group, dated March 2023 and revised February 2024, was submitted by the applicant. Table 18 on page 22 of the document shows the Primary Urban Service District has the capacity for 101 percent of demand for a 10-year period. It also shows the Primary Urban Service District has the capacity for 64 percent of the projected demand for a 15-year period. This data appears to support an expansion of the current Primary Urban Service District.

However, a Residential Capacity Analysis dated December 2023 was prepared consistent with existing Martin County Comprehensive Plan policies. This analysis demonstrates that the unincorporated areas of the eastern Primary Urban Service District have capacity for 326 percent (326%) of the projected demand through 2030. This analysis also shows that the unincorporated areas of the eastern Primary Urban Service District have capacity for 237 percent (237%) of the projected demand through 2035. This data concludes that there is sufficient supply of vacant land and undeveloped approved projects to meet the needs for the 10-year and 15-year planning horizon years and does not appear to support an expansion of the current Primary Urban Service District at this time. Please see the following tables from the Residential Capacity Analysis prepared by Metro Forecasting Models dated December 2023. This criterion has not been met.

RESPONSE: Disagree. The Residential Capacity Analysis (RCA) prepared by the County is not consistent with the existing Martin County Comprehensive Plan policies and does not take into consideration the changes proposed by the proposed text amendment. More specifically, the RCA prepared by the County utilizes different data sets than those specified within the County's Comprehensive Plan policies without explanation or justification for the use of data not otherwise defined in the County's Comprehensive Plan policies. Policy 4.1D.4 states “The percentage of residential housing demand that will be met outside the urban service districts shall be based on the average number of certificates of occupancy for the preceding five years”, however the RCA prepared by the County uses data cited and sourced from “Martin County Property Appraiser 2023

Parcel Data”. The data available from the Martin County Property Appraiser does not include certificate of occupancy information and is one instance among several where the RCA prepared by the County deviates from the County’s Comprehensive Plan policies, ultimately inhibiting independent verification of the methods and calculations contained therein.

An alternative RCA should be prepared based on the proposed text amendment. (See related responses in Section 5.B.) The County’s Residential Capacity Analysis is based on flawed methodology that overestimates supply and underestimates need. The attached “Cover Letter”, prepared by Laura Smith, GAI Consultants, Inc.- Community Solutions Group (CSG) summarizes the flaws in the County’s methodology and has been enclosed as Exhibit “5”. The updated Residential Capacity Analysis prepared by CSG that was previously submitted on March 25, 2024 is enclosed as Exhibit “6”.

- (6) Demonstrate that the land affected is suitable for urban uses; at a minimum, unsuitable uses include environmentally sensitive areas (to the degree they are protected by this Plan), prime agricultural areas, prime groundwater recharge areas and critical habitat for endangered or threatened species. This criterion is not intended to preclude development of surrounding lands provided that the unsuitable areas are fully protected;*

Staff analysis of Policy 4.7A.7(6): The 646 acres of land affected does not appear to include environmentally sensitive areas, prime agricultural areas, prime groundwater recharge areas or critical habitat for endangered or threatened species. The land has been commercially farmed for decades. The 396 acres of proposed Low Density Residential future land use (CPA 21-12) appear to be within the headwaters of Roebuck Creek, and any development on this property shall conform to all Land Development Regulations regarding wetland and upland habitat preservation. This criterion has been met.

RESPONSE: Agree. In fact, the inclusion in the PUSD and change in land use will remove the Agricultural land use and eliminate the direct discharge of untreated, nutrient-laden irrigation and stormwater run-off into the St. Lucie Canal and the headwaters of Roebuck Creek.

- (7) Demonstrate that the full range of urban public facilities and services can be economically and efficiently supplied at the adopted LOS standards; and*

Staff analysis of Policy 4.7A.7(7): The application materials do not demonstrate that the full range of urban public facilities and services can be economically and efficiently supplied to the 396 acres where the Primary Urban Service District is proposed, at present. Please see the memorandums from Martin County Utilities and Solid Waste Department (dated August 19, 2024) and the Public Works Department (dated August 16, 2024) attached to CPA 21-12.

The applicant has proposed sub-area policy text under Policy 4.1B.2 to ensure that the future development pays the full cost of capital facilities needed to address the impacts of such development. Please see page 12 of this staff report. This criterion has been met.

RESPONSE: Agree. The added text ensures future development on the property will amend the Capital Improvements Element and make capital improvements, if needed, to ensure adequate traffic and utility capacity in accordance with the County’s adopted level of service standards.

- (8) Be consistent with the adopted Capital Improvements Element*

Staff analysis of Policy 4.7A.7(8): The application materials do not propose specific amendments to the Capital Improvements Element. However, the applicant has proposed sub-

area policy text under Policy 4.1B.2 to ensure that the future development pays the full cost of capital facilities needed to address the impacts of such development. Please see page 12 of this staff report. This criterion has been met.

RESPONSE: Agree. The added text ensures future development on the property will amend the Capital Improvements Element and make capital improvements, if needed, to ensure adequate traffic and utility capacity in accordance with the County's adopted level of service standards. See response to the Traffic memo dated August 16, 2024 enclosed as Exhibit "7" and response to Utility memo dated August 19, 2024 enclosed as Exhibit "8".

Section 4. Deletion of Active Residential Development Tracking System

Another request is to delete Policy 4.1D.7, *Active residential development tracking system* in its entirety. The proposed amendment/deletion of Policy 4.1D.7 is shown below.

Staff analysis of proposed text amendment to Policy 4.1D.7: Staff does not recommend the deletion of Policy 4.1D.7 as it appears to be unnecessary in the context of this application. It is a longstanding Comprehensive Growth Management Plan policy that does not appear to impact the requested expansion of the Primary Urban Service District or other proposed amendments in this application.

RESPONSE: The County does not actively track or appear to utilize the tracking system identified in Policy 4.1D.7. However, the applicant has withdrawn this portion of the amendment since it is unnecessary in the context of this application. (See updated TEXT amendment enclosed as Exhibit "4".)

Section 5. Proposed Amendments to Residential Capacity Analysis Methodology

This text amendment application proposes numerous text changes to the methodology for residential capacity analysis outlined in the CGMP. The proposed changes in the following amendments substantially change the residential capacity methodology from what currently exists.

5.A. One such request includes amendments to Policy 4.1D.2, *Population technical bulletin*. These proposed changes are shown below.

Staff analysis of proposed text amendments to Policy 4.1D.2: Without calculations to show the difference in utilizing EDR versus BEBR as data sources for population projections, it is unclear what the implications of the proposed text amendments to Policy 4.1D.2 would be. Staff is uncertain what the rationale is for using BEBR compared to EDR data since both data sources for these population projection agencies are the same. Also, it is unclear how the "5-year average percent of total permanent population in the unincorporated area shall be applied against the BEBR medium population projections."

RESPONSE: BEBR data is available through specific periodical publications, while EDR data is posted on its website and may not include all data references and elements of BEBR publications related to population estimates and projections.

5.B. Another request to amend parts of the CGMP pertaining to residential capacity analysis methodology is to delete similar language in both Policy 4.1D.3, *Future residential housing unit demand*, and Section 1.7.B, *Housing unit demand projection*. The proposed amendments to each of these sections of the CGMP are shown below.

Staff analysis: The applicant is proposing to change the way that occupied housing units (HO)

and vacant seasonal housing units (HS) are defined without providing technical basis for these changes.

RESPONSE: Chapter 2 Section 2.4 of the County's Comprehensive Plan states the following definition: "Vacant seasonal housing units: The decennial Census count for residential housing units that are occupied, but for less than six months of the year. This definition excludes the following vacant categories used by the U.S. Census: For Rent; Rented, not occupied; For sale only: Sold, not occupied; For migrant workers."; however said citation is incorrect, the term "Vacant seasonal housing units" stated in the County's Comprehensive Plan is not a U.S. Census defined term, the term "Seasonal Vacant Units" is a U.S. Census defined term which is defined as "Seasonal housing units are those intended for occupancy only during certain seasons of the year and are found primarily in resort areas. Housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as seasonal. The term "Vacant seasonal housing units" and associated definition contained within the County's Comprehensive Plan misrepresents data sourced from the U.S. Census Bureau as it dissects specific categories of Census-reported Vacant Housing Units out of the calculation but fails to acknowledge categories of Census-reported Vacant Housing Units which are universally reported jointly or added into the calculation such as "seasonal, recreational, or occasional use" and "other vacant".

Policy 4.1D.3 of the County's Comprehensive Plan states the following definition: "Occupied housing units (HO) are classified by the Census as those residential housing units in use by the permanent population." However said citation is incorrect, the term "Occupied Housing Unit" is defined by the U.S. Census as "A housing unit is occupied if a person or group of persons is living in it at the time of the interview or if the occupants are only temporarily absent, as for example, on vacation. The persons living in the unit must consider it their usual place of residence or have no usual place of residence elsewhere. The count of "Occupied Housing Units" is the same as the count of "Households".

Staff analysis: The proposed text addition to Section 1.7.B(1) is not consistent with the proposed amendment to Policy 4.1D.3(1). The existing text in both subsections are nearly identical. The proposed amendments to these subsections should include the same language to not create any internal inconsistencies between these two Plan policies.

RESPONSE: Policy 4.1D.3(1) addresses only the calculation/projection of future occupied housing units based on the projected percentage increase in population. Policy 1.7.B(1) addresses the calculation/projection of total housing units based on the same calculation as Policy 4.1D.3(1) for occupied housing units plus the percent increase in vacant housing units. Policy 1.7.B(1) incorporates the calculation from Policy 4.1D.3(1). However, we concur that it would be appropriate to amend Policy 4.1D.3(1) to include the same language as proposed in Section 1.7.B(1). (See updated TEXT Amendment enclosed as Exhibit "4".)

Staff analysis: See staff analysis for Policy 4.1D.3(2) above. The change to the definition of Occupied housing units appears to be a difference without a distinction and it is unclear how the number would change. Changing the definition of Vacant seasonal housing units appears unnecessary since the following stricken text appears to eliminate the use of Vacant seasonal housing from the methodology.

RESPONSE: While the change in the description of occupied housing units may not change the resulting number since it would be reported by the US Census in any case, it more accurately reflects the methodology utilized by the US Census. As previously noted, the proposed amendment is intended to incorporate vacant units in the projection of demand as referenced in Section 1.7.B(1).

Staff analysis of proposed text amendments to Policy 4.1D.3 and Section 1.7.B: The impacts of deleting the above stricken text from both Policy 4.1D.3 and Section 1.7.B of the CGMP require further evaluation. Staff recommends the applicant clarify the proposed text. Additionally, it may be necessary for Martin County to contract with a third-party consultant to run a calculation based upon the proposed methodology.

RESPONSE: The applicant is open to modifying the proposed language in Section 4.1D.3 as described in the previous responses.

Based on early discussions with County staff, the applicant was led to believe that the County engaged David Farmer with Metro Forecasting Models to evaluate this application. If the County does not have the staff resources to properly evaluate this request, the applicant is open to discussions with the County to offset the costs of a third-party review. That said, the County has had this revised text amendment since April 3, 2023. Therefore, if the County intends to contract with a third-party consultant for further review, the applicant requests notification of this within 15 days of receiving this resubmittal.

5.C. Another request is to amend Policy 4.1D.5, *Residential capacity analysis*, and Section 1.7.C, *Residential capacity calculations*, to include similar deletions and additions to each policy. The proposed amendments to each of these sections of the Comprehensive Growth Management Plan are shown below.

Staff analysis: It is not clear how the text above would be applied. Staff has created the following example to illustrate what the language appears to say and compare how density transfer can occur on a site plan.

Example: 10-acre property with maximum density of 5 units per acre (upa). 6 acres (ac) of wetland and 4 acres of upland exist on the property (property is more than 50% inundated by wetlands).

Proposed methodology: $(5 \text{ upa} \times 0.75) \times 4 \text{ ac} = 15 \text{ total units}$.

Existing methodology: assumes max density over subject site. Half the density ($5 \text{ upa} / 2 = 2.5 \text{ upa}$) for 6 acres of wetlands may be transferred to upland portion of property.
 $4 \text{ ac upland} \times 5 \text{ upa} = 20 \text{ units}$.
 $6 \text{ ac wetland} \times 2.5 \text{ upa} = 15 \text{ units}$. 20 units (upland portion) + 15 units (wetland density transfer)
= 35 total units.

The proposed methodology shows a much lower potential for development and can only be accomplished if there is detailed knowledge about wetland acreage on a given site. The specific acreage of wetlands present on each parcel is unknown unless there is an approved site plan or some sort of wetland delineation for the parcel. Differentiating wetland acreage and calculating density based on wetland coverage would require a micro-analysis of each parcel when calculating residential capacity, which is not possible. Additionally, the proposed methodology assumes perfect knowledge of wetland acreage and location on parcels, which may not be possible or available when conducting the residential capacity analysis.

RESPONSE: This is exactly why the applicant has proposed this amendment. The County's default approach is to apply unrealistic assumptions that are not professionally acceptable to overstate supply as compared to actual development trends resulting from the permitting process.

If the County is unwilling or unable to conduct more detailed analysis, it should not penalize applicants by applying unrealistic assumptions. The County should conduct an analysis of a sample of approved developments that involved significant wetland acreage to evaluate the average trend.

After reviewing the applicants supporting data and analysis, GAI Residential Capacity Analysis, it is unclear the complex method of estimating potential wetland density was followed. Also, because the proposed calculation for estimating wetland density is different than the method of calculating wetland density transfer found in Policy 9.1G.2(8), the estimate for residential capacity may be substantially different from the development potential on an actual site plan.

RESPONSE: The capacity analysis should be based on average trends. Any given site plan may be lower or higher at a certain location. However, for the purpose of analyzing capacity for the entirety of the PUSD and SUSD, average trends will account for the variability across individual sites. Further, wetland density transfer is not currently contemplated by the County's Comprehensive Plan policies as they relate to calculation of residential capacity, Policy 4.1D.5 - specifically under the heading "Vacant Land" - states "the maximum allowable density for wetlands shall be one-half the density of a given future land use designation", which is contradictory and inconsistent with the following Policy:

Policy 9.1G.1, "All wetlands in Martin County shall be protected. Negative impacts shall not be allowed in wetlands or within the buffer surrounding the wetland. All development shall be consistent with the wetland protection requirements of the CGMP and Florida Statutes. Inconsistent and/or incompatible future land uses shall be directed away from wetland areas. Compliance with all wetland protection requirements must be demonstrated before issuance of a development approval or order."

These and other land development regulations, such as upland preserve requirements, wetland buffer requirements, height restrictions, stormwater requirements and density transition policies, make the transfer of density from wetlands impractical due to the lack of available development area. To address these inconsistencies and competing land development policies within the Comprehensive Plan, CSG's Residential Capacity Analysis employed an approach that avoids overstating development potential of parcels inundated by wetlands while also respecting the one-half density calculation described in Policy 4.1D.5. The GAI Residential Capacity Analysis identifies all parcels which are more than 50% inundated by wetlands and calculates the maximum allowable density for the given future land use designation for the non-wetland portion of the parcel while respecting the one-half, or 50%, density yield for properties containing less than 50% wetlands. (See previously submitted Residential Capacity Analysis prepared by GAI Consultants, Inc.- Community Solutions Group enclosed as Exhibit 6.)

Staff analysis: Instead of counting every vacant, subdivided, single-family lot, the proposed text uses undefined forecasting models and "location factors" that are also not defined. It is unclear to staff how many single-family lots would be counted or not counted with the proposed text and the deletion of existing text in Policy 4.1D.5(2). These existing lots of record are part of the capacity of residential units available in Martin County to meet the demand for population growth. Therefore, they should not be eliminated from consideration in the residential capacity analysis.

RESPONSE: The text amendment is intended to allow for alternative methodologies and best available data as required by Section 163.3177(1)(f) and (6)(a)2 and 4, F.S. It is not appropriate through policy to limit the potential scope of professionally accepted methodologies and data that

may be applied by staff or an applicant in evaluating the need for land use allocations to meet growth demands and community needs. The existing lots of record should be eliminated in favor of a methodology that would distinguish between antiquated subdivisions with poor absorption and other subdivisions that are absorbing at different rates. The proposed amendment provides the ability to apply other professionally accepted methodology in forecasting absorption rates for subdivisions rather than simply assuming that 100% of the lots will be developed within the planning period. It is noted that staff proposed to eliminate single family lots in the pending, EAR-based Comprehensive Plan amendments.

Staff analysis: Subsection (3) above excludes potential residential development in Community Redevelopment Areas. As mentioned above, there is no need to define vacant seasonal housing if the data will not be used to calculate excess vacant housing described in subsection (4) above.

RESPONSE: The proposed amendment deletes the reference to development potential in CRAs in recognition that the analysis of average development trends will incorporate on a proportional basis the average densities throughout the PUSD and SUSD. Moreover, the analysis of locational factors allows for consideration of market preferences by location for various types of residential units to allow for a more detailed segmentation of community needs, which is consistent with Section 163.3177(6)(a)4, F.S. The proposed amendment incorporates vacant units in the projection of demand as referenced in Section 1.7.B(1), which would also include seasonal housing.

Staff analysis: Another way to illustrate the difference in the proposed versus existing methodology for counting potential units on vacant lands is through a second example below.

Example: 10-acre property with maximum density of 5 units per acre (upa). 4 acres (ac) of wetland and 6 acres of upland exist on the property (property is less than 50% inundated by wetlands).

Proposed methodology: $(5 \text{ upa} \times 0.50) \times 6 \text{ ac} = 15 \text{ total units.}$

Existing methodology: assumes max density over subject site. Half the density ($5 \text{ upa} / 2 = 2.5 \text{ upa}$) for 4 acres of wetlands may be transferred to upland portion of property.

$6 \text{ ac upland} \times 5 \text{ upa} = 30 \text{ units.}$

$4 \text{ ac wetland} \times 2.5 \text{ upa} = 10 \text{ units. } 30 \text{ units (upland portion)} + 10 \text{ units (wetland density transfer)} = 40 \text{ total units.}$

As shown in both math examples, the proposed methodology calculates a much lower potential for development and can only be accomplished if there is detailed knowledge about wetland acreage on a given site.

RESPONSE: This is an example of the applicant's concern. The County's default approach is to apply unrealistic assumptions to overstate supply as compared to actual development trends resulting from the permitting process. If the County is unwilling or unable to conduct more detailed analysis, it should not penalize applicants by applying unrealistic assumptions. The County should conduct an analysis of a sample of approved developments that involved significant wetland acreage to evaluate the average trend.

Staff analysis: The proposed amendments require further consideration for potential impacts. There is no clear definition provided by the applicant for what "best management practices" and "forecasting models" would entail for each application that is submitted. The lack of definition in these phrases as an alternative to the established residential capacity methodology allows ambiguity and could result in different applicants submitting various methodologies

that they consider “best management practices”, each providing different conclusions and analyses.

RESPONSE: This is exactly the point. The County’s policies limit consideration of only data sets that it may prefer to utilize to the exclusion of other existing and future data sets that may be considered best available data. Similarly, the County’s policies limit consideration of other professionally accepted methodologies in forecasting demand and estimating supply. Notably, Martin County is the only jurisdiction in Florida that attempts to prescribe by policy only certain data and methodologies that can be utilized. It precludes consideration of data sets in the future that may be considered best available data without even knowing the extent of such data sets that will be available at the time of a future comprehensive plan amendment application. It also precludes other professionally accepted methodologies simply on the basis that the County may have to consider the merits and results of a methodology that differs from its own.

The County proposes to change its own methodology through the pending EAR-based Comprehensive Plan amendments, as it has done through previous Comprehensive Plan amendments. In some of those instances, the County has adopted a change only to subsequently change back to its former approach. It is not possible for a methodology at a given point in time to anticipate all potential data sets and methodologies that may be available in the future, even in just five years. The advancement of computer processing, GIS software, artificial intelligence, and yet unknown technical capabilities has and will continue to allow for the creation of new data sets and other professionally accepted methodologies in analyzing those data. It is inappropriate and not in compliance with statutory requirements to preempt such capabilities simply on the basis that not all such advancements can be anticipated or defined. Each applicant should be provided the opportunity to collect and present data and to apply professionally accepted methodology to support its application.

Staff analysis: The proposed amendments can be misleading for accurately measuring residential capacity. Regardless of whether residential development is actively underway, vested residential units must be considered in the residential capacity analysis. Vested residential units’ part of approved development orders that maintain the appropriate timetables can be built. These vested units must be taken into consideration when analyzing the residential capacity of unincorporated Martin County for this reason.

RESPONSE: The proposed text amendment does not eliminate consideration of vested units. Rather, it proposes an evaluation of absorption rates for vested residential units through the planning period based on best available data.

Staff analysis: As mentioned above, there is no need to define vacant seasonal housing if the data will not be used to calculate excess vacant housing described in subsection (4) above.

RESPONSE: As previously noted, the proposed text amendment incorporates vacant housing in Section 1.7.B(1). We concur that it would be appropriate to amend Policy 4.1D.3(1) to include the same language as proposed in Section 1.7.B(1) in regard to vacant housing. (See updated TEXT amendment enclosed as Exhibit “4”.)

Staff analysis of proposed text amendments to Policy 4.1D.5 and Section 1.7.C: The proposed amendments to Policy 4.1D.5(1) and Section 1.7.C(1) request changes to the calculation of available units on vacant residential lands. Utilizing the maximum allowable density allows for the planning of maximum intensities and densities on vacant lands. The proposed text does not consider the maximum allowable number of units that could be built under a future land use

designation and is therefore not an accurate measure of the possible available units on vacant residential lands.

RESPONSE: The County doesn't utilize maximum density for its infrastructure planning, as is evident in reviewing the MPO Long Range Transportation Plan, the Water Supply Plan and other County documents utilized in its planning process. The County utilizes maximum density for its evaluation of land use need to overstate capacity. It is inappropriate and not in compliance with statutory requirements to apply unrealistic assumptions that are "cherry-picked" only for land use need evaluation. Best available data confirms consistently that average densities achieved throughout the PUSD and SUSD are well below maximum.

5.D. – Another request is to amend Policy 4.1D.4, *Distribution of housing unit demand*. The proposed amendments to this policy are shown below.

Staff analysis of proposed text amendments to Policy 4.1D.4: It appears that utilizing the total number of housing units built compared to the number of housing units built inside the urban service districts is proposed instead of the average Certificates of Occupancy inside and outside the urban service districts. It is unclear how the units inside and the units outside the urban service districts would be determined from the Martin County Tax Roll and what the effective difference between these two data sources would be. It may be necessary for Martin County to contract with a third-party consultant to run a calculation based upon the proposed methodology.

RESPONSE: The County has been unable to extract Certificate of Occupancy data from its database. Notably, the Metro Forecasting Models analysis did not utilize Certificates of Occupancy but relied upon Martin County Property Appraiser 2023 Parcel data. GIS analysis can be utilized to identify all parcels located inside the Urban Service Districts, and the "actual year built" for each unit can be determined by cross referencing the GIS analysis identified parcels with the Martin County Tax Roll parcel detail units.

The applicant is prepared to move forward to hearing based on the responses and materials provided in this resubmittal. If the County does not have the staff resources to properly evaluate this request, the applicant is open to discussions with the County to offset the costs of a third-party review. That said, the County has had this particular proposed text since April 3, 2023. Therefore, if the County intends to contract with a third-party consultant for further review, the applicant requests notification of this within 15 days of this resubmittal.

5.E. Another request is to amend Section 1.7.A, *Population estimates* of Chapter 1, Preamble. The proposed amendment to this section is shown below.

Staff analysis of proposed text amendment to Section 1.7.A: As with the proposed amendments to Policy 4.1D.2, it is unclear to staff what the implications would be in utilizing EDR versus BEBR as data sources for population projections without calculations to demonstrate the difference. It is not abundantly clear what the rationale is for the proposed change in using occupied housing units or households compared to residential housing units for level of service determination.

RESPONSE: Reference to BEBR would allow for use of BEBR published data sets that may or may not be posted by EDR on its website. Occupied housing units is a more accurate descriptor for dwelling units housing the permanent population as "residential housing units" would include all vacant housing units in addition to all occupied housing units or households.

5.F. – Another request is to amend Sections 1.7.D, *Peak population in residential housing units for the unincorporated area*, and 1.7.E, *Peak and weighted average population for Level of Service determination (LOS)*. The proposed amendments to each of these sections are outlined below.

Staff analysis of proposed text amendments to Sections 1.7.D and 1.7.E: It appears that the proposed amendments to Section 1.7.D would result in a different way of calculating the peak population in residential housing units for the unincorporated area, but weighted average population and peak population is used for Capital Improvements Planning. Sections 1.7.D. and 1.7.E are not relevant to residential capacity calculations.

RESPONSE: Occupied housing units is a more accurate descriptor for dwelling units housing the permanent population as “residential housing units” would include all vacant housing units in addition to all occupied housing units or households. Reference to vacant seasonal housing units is based on the proposed text change based on the US Census. While Sections 1.7.D and 1.7.E are not related to residential capacity calculations, the text change is proposed for consistency with the terms as described in the other policies previously referenced.

Conclusion

Based on staff’s analysis of the application materials provided and their consistency with the goals, policies, and objectives of the Comprehensive Growth Management Plan, staff does not recommend approval of the text amendment application. The basis for staff’s recommendation is outlined below:

- **Compliance with Policy 4.7A.7. subsections (1), (2), and (5) have not been demonstrated.**

Policy 4.7A.7.(1)

RESPONSE: Disagree. Internal consistency has been addressed.

Policy 4.7A.7.(2)

RESPONSE: Disagree. Compatibility with the adjacent ranchettes and industrial lands are ensured through the PUD Master Site Plan process. Ranchettes located outside of the PUSD are inherently compatible with low density, urban uses located in the PUSD. The adjacent Industrial lands have been strategically designed with physical buffers including lakes, berms and landscape buffers in anticipation of future residential use on the subject property.

Policy 4.7A.7.(5)

RESPONSE: Disagree. . The Residential Capacity Analysis (RCA) prepared by the County does not take into consideration the changes proposed by the proposed text amendment. An alternative RCA should be prepared based on the proposed text amendment. The County’s Residential Capacity Analysis is based on flawed methodology that overestimates supply and underestimates need. The text amendment is intended to allow for alternative methodologies and best available data as required by s. 163.3177(1)(f) and (6)(a)2 and 4, F.S. It is not appropriate through policy to limit the potential scope of professionally accepted methodologies and data that may be applied by staff or an applicant in evaluating the need for land use allocations to meet growth demands and community needs. The existing lots of record should be eliminated in favor of a methodology that would

distinguish between antiquated subdivisions with poor absorption and other subdivisions that are absorbing at different rates. The proposed amendment provides the ability to apply other professionally accepted methodology in forecasting absorption rates for subdivisions rather than simply assuming that 100% of the lots will be developed within the planning period.

- The application proposes to delete Plan text that is unrelated to other proposed changes. It is unclear why the proposed deletion of Policy 4.1D.7. and Sections 1.7.D. and 1.7.E. are needed.

RESPONSE: The deletion of these policies is formally withdrawn.

- Proposed amendments to Section 1.7.B; Section 1.7.C; Policy 4.1D.3; and Policy 4.1D.5 are not clear. Until a methodology is applied and words describing calculations become calculations, it is unclear the result. It may be necessary for Martin County to contract with a third-party consultant to run a calculation based upon the proposed methodology.

RESPONSE: Based on early discussions with County staff, the applicant was led to believe that the County engaged David Farmer with Metro Forecasting Models to evaluate this application. If the County does not have the staff resources to properly evaluate this request, the applicant is open to discussions with the County to offset the costs of a third-party review. That said, the County has had this revised text amendment since April 3, 2023. Therefore, if the County intends to contract with a third-party consultant for further review, the applicant requests notification of this within 15 days.

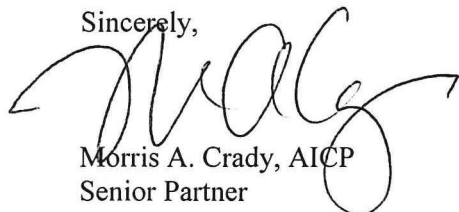
- Proposed amendments to Section 1.7.B(1) and Policy 4.1D.3(1) are not consistent with each other and could result in internal inconsistency within the Comprehensive Growth Management Plan.

RESPONSE: Policy 4.1D.3(1) address only the calculation/projection of future **occupied** housing units based on the projected percentage increase in population. Policy 1.7.B(1) addresses the calculation/projection of **total** housing units based on the same calculation as Policy 4.1D.3(1) for occupied housing units plus the percent increase in vacant housing units. Policy 1.7.B(1) incorporates the calculation from Policy 4.1D.3(1). However, we concur that it would be appropriate to amend Policy 4.1D.3(1) to include the same language as proposed in Section 1.7.B(1). (See updated text amendment enclosed as Exhibit "4".)

Based on these responses, the proposed text amendments meet all applicable Comprehensive Plan and statutory requirements and should enable a staff recommendation of approval.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,



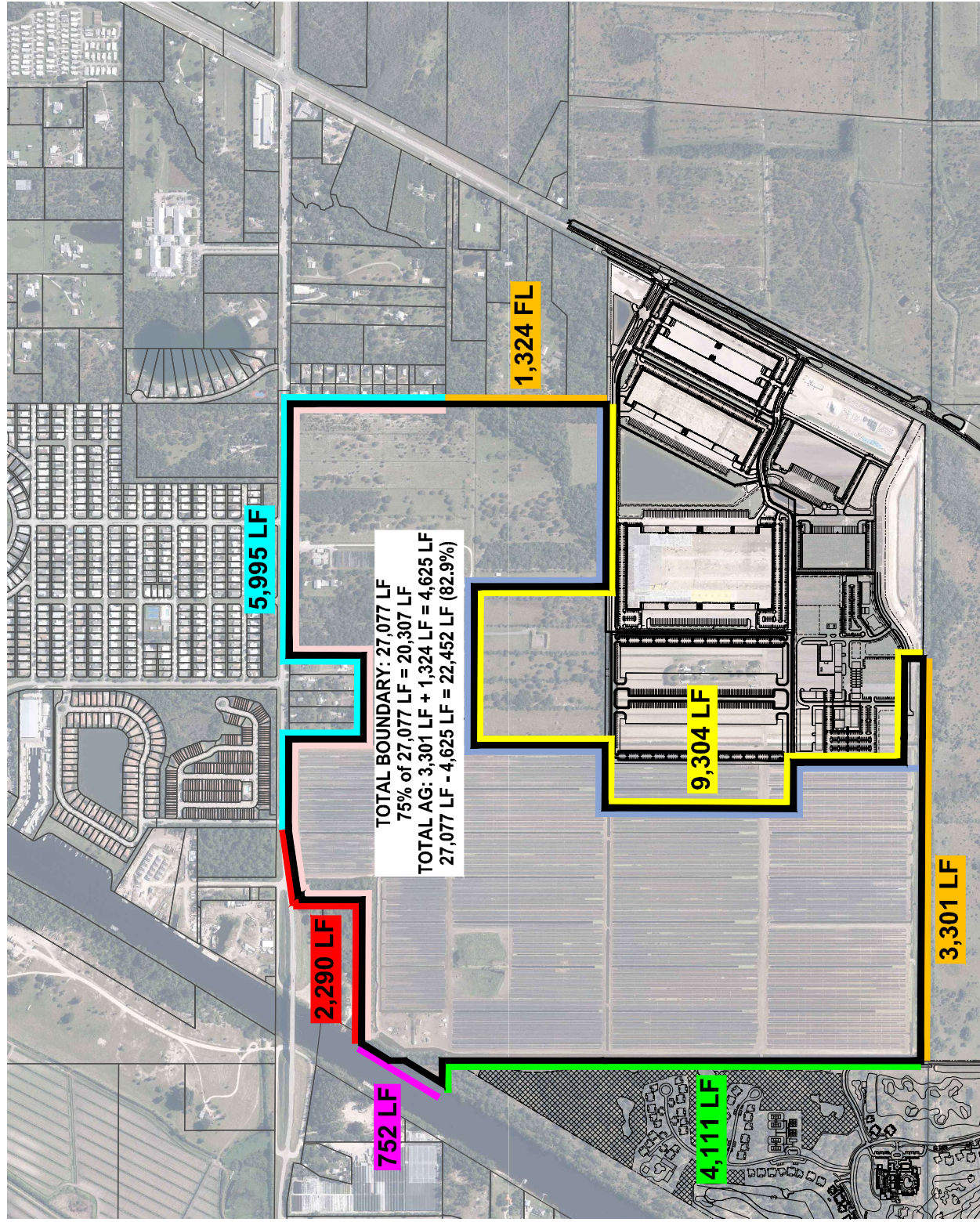
Morris A. Crady, AICP
Senior Partner

Copy to: Client and development team

Adjacent Use Legend

- Residential
- Agricultural
- Industrial
- Golf Course
- Canal
- Commercial
- Primary Urban Service District
- Freestanding Urban Service District

ADJACENT NON-AGRICULTURAL DEVELOPMENT



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October 15, 2024

**VIA - EMAIL: dsmith@martin.fl.us; shetherington@martin.fl.us;
hjenkins@martin.fl.us; sheard@martin.fl.us; eciampi@martin.fl.us**

Commissioner Smith
Commissioner Hetherington
Commissioner Jenkins
Commissioner Heard
Commissioner Ciampi
Martin County
2401 SE Monterey Road,
Stuart, FL 34996

RE: Martin County Proposed Evaluation-Based Comprehensive Plan Amendments
File No. CPA 24-04, CPA 24-01 and CPA 24-02
Transmittal Hearing October 22, 2024

Dear Commissioners:

Stearns Weaver Miller has the pleasure of representing Kolter Land LLC, Kanner/96th Street Investments, LLC, and their affiliates. We submit these written comments and recommendations on their behalf in regard to Martin County's proposed evaluation-based Comprehensive Plan amendments. As described in detail below, these proposed amendments are not in compliance with state law. Please enter these comments into the record at the upcoming transmittal hearing on October 22, 2024.

I. Background

Growth Management staff have proposed amendments to Future Land Use Element policies 4.1D.3 and 4.1D.5 concerning the methodology for projecting future residential housing demand and for conducting the related residential capacity analysis for the purpose of determining whether future land use map amendments are warranted in response to population and growth demands. Please note that these comments are based on the attached excerpted draft amendments (**Attachment "1"**) presented to the Martin County Local Planning Agency at its public hearing held on October 3, 2024 ("Draft Amendments") and that are scheduled for consideration by the Board of County Commissioners at the October 22, 2024 public hearing. This letter also addresses concerns regarding the draft Residential Capacity Analysis, dated September 6, 2024, that was included with the background documents provided by staff.

It is important to note that Kolter Land filed an application on March 26, 2024 that proposed text amendments to the above referenced policies. This application has not yet been scheduled for public hearings before the Local Planning Agency and the Board of County Commissioners. As discussed in that submittal, the County's approach to determining land use need is inconsistent with statutory changes enacted in 2011 with the passage of the Community Planning Act, as well as other statutory requirements set forth in Section 163.3177, Fla. Stat. Those comments are attached (**Attachment "2"**) and summarize the concerns of Kolter Lands in regard to the County's approach for determining the need for land use allocations.

II. Martin County's Policies Must Not Preempt Use of Best Available Data and Professionally Accepted Methodology

In effect, the County has determined through its policies that best available data which may exist at the time of a future plan amendment application will not be considered if it is not listed in the County's policies. The County's policy approach is prescriptive in nature. It mandates the use of certain data, while prohibiting consideration of other data. It is not appropriate and is not in compliance with s. 163.3177(1)(f), Fla. Stat., to prescribe that only certain data can be considered to the exclusion of other data.

Another major compliance concern is that the County's policies specify one particular methodology rather than allowing the County to consider an alternative, professionally acceptable methodology for calculating housing demand and residential capacity. Section 163.3177(6)(f)2, Fla. Stat., specifies that local governments cannot require one particular methodology over another professionally accepted methodology. Yet, the County's policies preempt consideration of any other professionally accepted methodology before even reviewing alternative methodologies that may be prepared by an applicant in reliance on best available data. In effect, the County has determined that it will consider only its preferred methodology to the exclusion of any other professionally accepted methodology, which is facially inconsistent with statutory requirements.

III. Martin County's Mandated Methodology Utilizes Overly-Simplified and Unrealistic Assumptions That Fail to Account for Real World Conditions

The two major policy deficiencies described above are exacerbated by the County's particular methodology requirements that fail to rely on best available data and fail to react appropriately to best available data. For example, the County's policies in prescribing use of only certain data does not allow consideration of basic data routinely utilized in land use needs analyses, such as *persons per household*. It also fails to differentiate between single family and multifamily units in determining land use allocation needs and doesn't consider how demand varies by unit type, location, development form and community type. These are basic considerations that are required in order for a methodology to be considered professionally accepted. The County's methodology ignores market realities and assumes that the demand for a single family unit in a conventional, low density subdivision is the same as the demand for a multifamily unit in a high density setting within a neo-traditional new town or urban village. These are very different market preferences that are completely homogenized by the County's *one-size fits all* approach.

The County's methodology also fails to consider those same market preferences in determining the extent to which land use allocations potentially respond to and satisfy projected

housing demands. Most notably, the Draft Amendments require the County's residential capacity analysis to count the units from all approved Master Plans and Final Site Plans toward overall capacity without any distinction based on the market preferences of future residents. Similar to the one size fits all demand projection methodology, the residential capacity analysis considers all units to be the same regardless of unit type, location, development form and community type. Newfield is a perfect case in point. The Residential Capacity Analysis, dated September 6, 2024, counts 4,200 units approved for Newfield toward residential capacity without any supporting analysis estimating how much of the projected housing demand will be satisfied by the single family and multifamily housing planned for that project in a neo-traditional development form as compared to more conventional, lower density single-family neighborhoods. The County applies very simplistic assumptions in its one-size fits all prescriptive methodology that completely ignores market preferences. As such, the County's policies are not consistent with s. 163.3177(6)(a)4, Fla. Stat.

The County's methodology for determining residential capacity similarly fails to react appropriately to best available data concerning development potential of vacant lands. Rather than evaluate actual trends, the County's policies prescribe that all vacant lands must be assumed to develop to the maximum density permitted by the applicable land use category and that density within wetlands must be assumed to count at 50% of the maximum density permitted by the applicable land use category. Actual development trends documented over decades prove that these unfounded assumptions are simply unrealistic and greatly overstate potential capacity based on the character of the undeveloped lands and applicability of policies governing land use compatibility, density transitions, wetland protection and that provide guidance for regulatory requirements that realistically limit development potential. Section 163.3177(6)(a)2 requires an analysis of such factors so that land use allocations are based on the study of actual data and trends over time rather than mandating over-simplified assumptions that are not consistent with real-world development limitations that yield the average densities documented by long-term trends. The market will develop to the maximum density achievable based on the character of the undeveloped land (i.e., topography, habitat conditions, floodplain conditions, etc.), taking into account required policies and regulations. It is internally inconsistent to adopt policies that ignore the effects of the County's comprehensive plan policies that limit ability to achieve maximum densities.

IV. Martin County's Methodology for Estimating Residential Capacity Is Internally Consistent with Other Comprehensive Plan Elements and Is Not Coordinated with Other Agency Plans

It is also evident that the County's need methodology is not consistent with the data-driven plans prepared by other agencies, including the Martin County MPO and the South Florida Water Management District (SFWMD). The Martin County Long Range Transportation Plan forecasts future population and housing growth by Traffic Analysis Zone based on average development trends rather than assuming maximum densities. In fact, this is how all of the MPOs/TPOs plan for transportation needs throughout urban counties in Florida. Similarly, the SFWMD prepares its Regional Water Supply Plan based on average development trends as do all of the other Water Management Districts. Martin County has developed its methodology for land use allocation purposes based on mandates assumptions and data exclusions that are internally inconsistent with the methodologies and forecasts utilized to prepare its transportation and various infrastructure

elements. As such, the County's policies fail to achieve internal consistency as required by s. 163.3177(2), Fla. Stat. Mandating unrealistic assumptions and data exclusions by policy in advance of receiving a future plan amendment contravenes statutory requirements. Such policies fail to allow the County or an applicant to consider best available data at the time of a future plan amendment application submittal. Moreover, the methodology itself is not professionally accepted.

Another major problem concerning the residential capacity methodology is that it fails to differentiate antiquated subdivisions from successful subdivisions. Again, the prescriptive methodology requires that all vacant lots in a platted subdivision must be counted toward capacity, regardless of whether the subdivision has experienced poor absorption as a result of poor design, lack of amenities, infrastructure deficiencies or other factors that have resulted in the market bypassing the approved subdivision for other preferred subdivisions. Without any consideration for absorption rates, the County's methodology unrealistically assumes that such antiquated subdivisions will satisfy housing demands through the 2045 plan horizon. This short-sighted policy approach ignores best available data and effectively precludes the ability of the housing market to provide higher quality residential housing products in response to market preferences.

V. Martin County Has Not Implemented the Community Planning Act and other Related Statutory Provisions Addressing Community Needs and Market Preferences

Finally, it is important to recognize that Martin County has not implemented the statutory changes resulting from the Community Planning Act. Section 163.3177(6)(a)2 specifies that comprehensive plan policies must be based on studies and surveys addressing the amount of land required to accommodate anticipate growth taking into account the character of undeveloped lands, the need for job creation, capital investment and economic diversification, and the need to modify land uses and development patterns within antiquated subdivisions. Martin County has a legal obligation to study development trends resulting from its own policies. If policies have not been successful in achieving maximum densities or retrofitting antiquated subdivisions, then Martin County must acknowledge those policy limitations rather than mandating over-simplifying assumptions that ignore the effects of its own policies. Martin County should study growth and development trends carefully and provide a transparent, candid evaluation of how its policies affect development in the market place. Rather than imposing a methodology designed to constrain development based on unsupported assumptions, Martin County should embrace the spirit of the Community Planning Act and comply with its requirements. In regard to land use allocations, Section 163.3177(6)(a)4 sets forth a broader approach for determining community needs. It states:

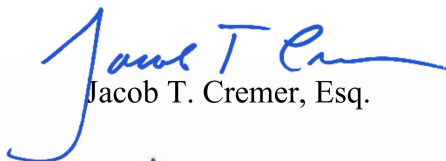
The amount of land designated for future planned uses shall provide a balance of uses that foster vibrant, viable communities and economic development opportunities and address outdated development patterns, such as antiquated subdivisions. The amount of land designated for future land uses should allow the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business and may not be limited solely by the projected population.

Martin County's formulaic policy approach was not amended in response to the Community Planning Act that was enacted to ensure local governments allocate land uses in response to the overall needs of the community. Housing prices have increased substantially, and the County's prescriptive methodologies only exacerbate the problem by precluding consideration of best available data and imposing unrealistic assumptions designed to under-project housing demand and overstate capacity.

We acknowledge that the Draft Amendments attempt to correct two significant shortcomings of the County's methodology. In particular, the proposed amendment to Policy 4.1D.3 adjusts the County's formula by multiplying Total Housing Units by the percentage increase in projected population to calculate increased demand for housing compared to the existing housing base. However, this amendment still does not account for other factors affecting housing demand as discussed in the foregoing. Similarly, the proposed amendment to Policy 4.1D.5 eliminates the unsupported 3% excess vacancy provision. However, the proposed methodology adjustments do not correct the fundamental legal deficiencies inherent with the County prescriptive, formulaic approach that prevents use of best available data, doesn't react appropriately to available data, mandates unrealistic assumptions in lieu of undertaking appropriate studies, and precludes consideration of other methodologies that are professionally accepted. At the very least, the County should amend its policies to allow applicants to utilize other professionally accepted methodologies.

In conclusion, while the Draft Amendments have some notable improvements that we commend the County on considering, as a whole the Draft Amendments are not in compliance as defined by section 163.3184(1)(b), Fla. Stat. We would be happy to meet with you or staff to discuss ways to ensure that any amendments that are approved are in compliance.

Sincerely,



Jacob T. Cremer, Esq.



Kenneth B. Metcalf, AICP

CC:

Morris A. Crady, AICP (mcrady@lucidodesign.com)

Josh Long, Kolter Land LLC (jlong@kolter.com)

Sarah Woods, Martin County Attorney (swoods@martin.fl.us)

Don Donaldson, Martin County Administrator (ddonaldson@martin.fl.us)

Paul Schilling, Martin County, Growth Management Director (pschilling@martin.fl.us)

Clyde Dulin, Martin County, Comprehensive Planning Administrator (cdulin@martin.fl.us)

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March 18, 2024

VIA - EMAIL: slove@martin.fl.us

Samantha Lovelady, AICP, Principal Planner
Martin County Growth Management Department
2401 S.E. Monterey Road
Stuart, FL 34996

RE: Response to Staff Analysis Comments Dated December 15, 2023
CPAs #21-11 & 21-12, Waterside Comprehensive Plan Text and FLUM
Amendments

Dear Ms. Lovelady:

Our firm has been engaged by the Applicant to provide our expertise related to these applications. By way of background, Mr. Cremer is a land use and property rights attorney with a background in land use planning, including as a Gubernatorial Fellow at the State Land Planning Agency. Mr. Metcalf is the Firm's Director of Planning & Development Services. He is a certified land planner with over 36 years of professional planning experience in the public and private sector, including 16 years with the State Land Planning Agency. He has served as an expert witness in more than 40 administrative and circuit court proceedings involving a variety of planning subjects, including urban and regional planning and urban sprawl. Mr. Metcalf's CV is enclosed.

In light of staff's December 15, 2023 comments, the Applicant reiterates the enclosed legal and planning analysis, which was not addressed by staff's comments. We drafted this analysis and have concluded that Martin County's existing Comprehensive Plan does not fully implement the requirements of section 163.3177, Florida Statutes. Based on this, the Applicant's proposed text amendments are ***necessary*** to ensure that the County's decisions on the Applicant's Waterside-specific amendments are reasonable and not arbitrary in light of statutory requirements.

We look forward to working with Martin County and trust that the application will be reviewed in accordance with the protections and constraints of chapter 163, Florida Statutes.

Sincerely,


Jacob T. Cremer, Esq.


Kenneth B. Metcalf, AICP

CC: Erin J. Tilton, Esq., Stearns Weaver

STEARNS WEAVER MILLER



* Non-Lawyer

PRACTICE AREAS

Planning/GIS Services
Land Development
Land Use/Zoning
Environmental
Transportation
Ad Valorem Tax
Real Estate
Government & Administrative

EDUCATION

M.S., *summa cum laude*, Urban and Regional Planning, Florida State University, 2002

B.A., University of South Florida, 1985

CERTIFICATIONS

American Institute of Certified Planners

KENNETH B. METCALF, AICP

Director of Planning & Development Services*, Tallahassee
850-329-4848 | kmetcalf@stearnsweaver.com

Kenneth B. Metcalf is a certified land planner with over 36 years of professional planning experience in the public and private sector, including 16 years with the Florida Department of Community Affairs (FDCA) and ten years at the Tallahassee office of an international law firm. During his tenure with FDCA he was actively involved in formulating Department growth management strategies and in implementing all facets of administrative rulemaking, including drafting of rules, conducting workshops and serving as an expert witness on rule challenges on behalf of FDCA and the Administration Commission. Ken navigates clients through Florida's complex growth management and permitting arena, providing public and private sector clients with innovative solutions and planning strategies across a broad range of planning issues. His diverse practice ranges from planning and entitling some of Florida's largest New Town developments, to working at the neighborhood level on infill and redevelopment sites, including CRA projects. His services include planning and policy analysis related to all aspects of land use & development, as well as supporting technical services, such as transportation planning. Ken routinely negotiates with local, regional and state agencies on behalf of public and private sector clients.

Ken has served as an expert witness in more than 40 administrative and circuit court proceedings involving a variety of planning subjects, including urban and regional planning, comprehensive planning, Florida's growth management requirements, Developments of Regional Impact, Area of Critical State Concern Programs, Monroe County and Key West Comprehensive Plans and Land Development Regulations, aerial photograph interpretation and assessment of development impacts and rulemaking. Ken also provides expert witness services regarding land use and zoning to support valuation proceedings related to eminent domain, Ad Valorem and floodplain management.

He has also served as an adjunct instructor at Florida State University teaching graduate courses in growth management and infrastructure planning.

AREAS OF CONCENTRATION

- Comprehensive Planning/Land Development Regulations
- Developments of Regional Impact
- Areas of Critical State Concern
- State and Federal Permitting Programs
- Federal Coastal Consistency Program
- Legislation and Administrative Rulemaking
- Development Agreements
- Development Feasibility/Impact Analysis
- Compatibility Analysis

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Kenneth B. Metcalf – 2

- Land Use Need/Urban Sprawl Evaluation
- Transportation Concurrency/Proportionate Share Agreements
- Impact Fee/Mobility Fee Agreements
- Transportation/Parking Studies
- Multi-modal Planning
- School Concurrency
- Emergency Management/Evacuation Modeling
- Coastal Planning/ Development Strategies
- Resiliency/Sea Level Rise Vulnerability Analysis
- Environmental Planning/Permitting
- Affordable Housing Programs and Development Strategies
- Redevelopment/Historic Preservation
- New Towns/Urban Villages/Mixed-use Development/Sustainability
- Sector Plans/Special Area Plans/Neighborhood Master Plans
- Rural Land Stewardship Planning
- Resort Planning/Entertainment Districts
- Special Use Planning (Campus Master Plans/Airports/Ports/Marinas)
- Age-Restricted Developments

REPRESENTATIVE EXPERIENCE

Developments of Regional Impact

- Berkshire Lakes DRI (Essentially Built Out Agreement), Collier County. Shopping Center project.
- Bluewater Bay DRI (NOPC/Conversion of Golf Course), Okaloosa County. Suburban residential/multiuse.
- Briger DRI (DRI Management), Palm Beach Gardens.
- Cedar Creek DRI (ADA), Baker County. Suburban new town.
- Centrepark DRI (NOPCs), West Palm Beach. Office development.
- Chapel Trail DRI (Essentially Built Out Determination), Broward County.
- Circle Square Ranch Vested DRI (Agreement/Management), Marion County. 5,000-unit mixed use development.
- Destiny New City (Planned DRI), Osceola County. Urban mixed-use new city.
- Emerald Lakes DRI, Walton County and Okaloosa County, Essentially Built Out Agreement. Suburban/multiuse/resort.
- Fallschase Vested DRI (Vested Rights Agreement) Tallahassee. Suburban residential/multiuse.
- Flagler Center (Due Diligence/Transaction), Jacksonville.
- Florida Rhythm DRI (ADA), Washington County. Suburban residential.

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Kenneth B. Metcalf – 3

- Hammock Dunes DRI (NOPCs/Administrative Hearing), Flagler County. Resort project.
- Hawks Cay DRI (NOPC/Land Use Conversion Agreement), Monroe County. Resort project.
- Innovation Park (DRI Management/Land Use), Tallahassee. Technology park at Florida State University.
- LTC Ranch DRI (Impact fee credit agreements), St. Lucie County/Port St. Lucie. Suburban residential/multiuse.
- Miami Downtown DRI (Agreement). Miami.
- Murdock Center (Due Diligence/Transaction), Charlotte County.
- Nocatee DRI (Due Diligence/Transaction), St. Johns County, Suburban residential/multiuse.
- Old Brick Township DRI (ADA), City of Palm Coast. Mixed use new town.
- On Top of the World DRI (NOPCs/Agreements/DRI Management), Marion County. 32,400-unit age restricted development with non-residential uses.
- PGA Resort/Verano DRI (NOPCs), Port St. Lucie. Suburban residential/multiuse development.
- Portofino DRI (NOPCs), Miami Beach. Multifamily/resort project.
- Prominence DRI (ADA), Walton County. Resort/residential.
- Restoration DRI (Feasibility Analysis, Comprehensive Plan Amendment, Administrative Hearing), Edgewater. Mixed use new town.
- Reunion DRI (Transportation Agreement), Osceola County. Resort project.
- Sandestin DRI (NOPC/Vested Rights Compliance Agreement), Walton County. Resort project.
- Seahaven DRI (ADA), Panama City Beach. Resort project.
- Seascape DRI (NOPCs), Walton County. Resort project.
- Southbend DRI (NOPC/Mitigation Agreement), Tampa. Suburban residential/multiuse.
- Southeast Overtown DRI (Due Diligence/Transaction), Miami.
- Sweetwater Ranch (Planned DRI), Hardee County. Mixed use new town.
- The Reserve DRI (NOPCs), St. Lucie County. Suburban multiuse development.

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Kenneth B. Metcalf – 4

- Victoria Park DRI (NOPCs/Transportation Agreement), Deland. Suburban residential/mixed use.
- Visions DRI (ADA), St. Lucie County. Urban mixed Use new town.
- World Golf Village (Due Diligence/Transaction), St. Johns County.

Florida Resort/Marina Projects

- Banana Bay Resort, Key West. Prepared DRI vested rights modification analysis and supporting compliance analysis for development agreement to support redevelopment of resort.
- Beachwalk Hotel, Hallandale. Supporting parking analysis for resort and drafted parking code amendment.
- Boat House and Coral Lagoon Resort, Marathon. Supporting compliance analysis for development agreement to enable redevelopment and intensification of resort.
- Bulow Creek Resort, Flagler County. Drafted PUD provisions and provided supporting analysis to address compliance with comprehensive plan.
- Cypress Lakes Resort, Walton County. Supporting compatibility analysis and testified as expert in circuit court challenge.
- Doral Country Club, Doral. Provided supporting needs and infrastructure analysis for redevelopment of Doral white golf course to a mixed-use, TND project.
- Fallschase PUD, Tallahassee. Provided supporting analysis to renegotiate vested rights terms and consistency findings for project.
- Faroblanco Resort, Marathon. Prepared DRI vested rights analysis and supporting compliance analysis for development agreement to expand mixed-use resort and marina.
- Hampton Inn, Longboat Key. Compatibility analysis to support redevelopment of resort.
- Indigo Reef, Marathon. Negotiation with City planning staff on conditional use approval for redevelopment of the former Key Lime Resort.
- Lighthouse Pointe PUD, Flagler County. Resort style, mixed-use project with marina in Flagler County. Manatee protection analysis and related agency negotiations.
- Limetree Bay Resort, Florida Keys. Prepared supporting analysis for boutique resort in Florida Keys to demonstrate compliance with comprehensive plan and code requirements. Supporting parking analysis and drafted parking code amendments.
- Longboat Key Club Resort, Longboat Key. Strategic support for redevelopment of resort.

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Kenneth B. Metcalf – 5

- Multiple Resort Properties. Due diligence analysis of DRI requirements, comprehensive plan designation, zoning, and development entitlements for several properties in the City of Key West and unincorporated Monroe County for purposes of loan refinancing and/or acquisition.
- Pompano Beach Hotel, Pompano Beach, Florida. Supporting parking analysis for resort and drafted parking code amendment.
- Safe Harbor Resort, Florida Keys. Drafted plan amendment provisions and provided supporting analysis for mixed-use resort/marina project in the Florida Keys.
- Stark Ranch Equestrian Resort, St. Lucie County. Drafted mixed-use resort land use category with performance-based density bonus system.
- Tidelands Marina Resort, City of Palm Coast. Residential PUD with marina in the City of Palm Coast. Manatee protection analysis and related agency negotiations.
- Town of Marineland. Drafted plan amendments and provided supporting analysis for New Town/resort land use category.
- Tranquility Bay, Marathon. Supporting compliance analysis for development agreement to enable redevelopment and intensification of resort.

Florida Public/Quasi-Public Planning Projects

- Calhoun County, Florida. On behalf of developer, drafted land use category to allow for mixed-use resort and greenway corridor preservation designation.
- Charlotte County. Drafted revised policies to support negotiated settlement of compliance challenge to EAR-based comprehensive plan amendments.
- Destin, Florida. On behalf of developer, provided entitlement analysis for major development within CRA and assisted in negotiating settlement between DCA and City of Destin regarding MMTD plan amendments.
- Dunnellon, Florida. Evaluation and Appraisal Report, EAR-based Comprehensive Plan Amendments, Land Development Code Update, Economic Development web update, Historic District Enhancement Plan.
- Edgewater, Florida. Prepared population projections, land use needs analysis and other planning studies to support comprehensive plan amendments for Restoration DRI development. Testified in administrative hearing as expert witness.

STEARNS WEAVER MILLER

Kenneth B. Metcalf – 6

- Haines City, Florida. Contract for planning services to revise population projections, prepare supporting analysis and modify policies for Special Area Plan amendments, prepare supporting analysis for Water Supply Plan amendments, and negotiate compliance with DCA.
- Hardee County, Florida. On behalf of developer, drafted New Town land use category for 13,000-unit New Town development based on traditional neighborhood development principles.
- Jacksonville Beach, Florida. Sea level rise modeling, risk assessment and Peril of Flood Comprehensive Plan amendment.
- Key West, Florida. Contract for planning services to assist City in evaluating and applying Florida Keys Hurricane Evacuation Model to determine future allocations for comprehensive plan update.
- Laurel Hill, Florida. EAR-based Comprehensive Plan Amendments, Land Development Code Update/Economic.
- Leon County Research and Development Authority. Contract for planning services to evaluate long term development feasibility of Innovation Park (high-tech research park) and analyze options for addressing compliance with DRI program requirements pursuant to §380.06, F.S.
- Marineland. On behalf of developer, drafted plan amendments and negotiated with state to allow for a traditional neighborhood development, mixed-use resort project.
- Monroe County, Florida. Contract for planning services to assist Monroe County in addressing affordable housing needs, hurricane evacuation modeling and related negotiations with the Department of Community Affairs.
- New Smyrna, Florida. On behalf of developer, drafted plan amendment provisions and provided supporting analysis to establish long term concurrency system.
- Osceola County, Florida. On behalf of developer, worked with Osceola County Smart Growth Director to draft Overlay to allow for area wide planning approach for New City and related Purchasable Development Rights Program.
- Port Orange, Florida. On behalf of developer, drafted TCEA amendment language and led negotiations with the Department of Community Affairs.
- Port St. Lucie, Florida. On behalf of developer, drafted plan amendments and supporting analysis for Lighthouse Point mixed resort and required conversion of industrial land use to mixed-use land use designation.

STEARNS WEAVER MILLER

Kenneth B. Metcalf – 7

- St. Marks, Florida. Sea level rise modeling, risk assessment and Peril of Flood Comprehensive Plan amendment.
- Volusia County, Florida. Farmton Comprehensive Plan Amendments. On behalf of developer, prepared supporting population projections, land use needs analysis and other planning studies for 50,000-acre development proposal for mixed-use development. Testified in administrative hearing as expert witness.

PROFESSIONAL & COMMUNITY INVOLVEMENT

- American Planning Association (APA), Florida Chapter, Legislative Affairs Committee, 2016-2020
- Urban Land Institute (ULI), Urban Plan Volunteer Facilitator/Mentor
- American Institute of Certified Planners (AICP)
- Association of Florida Community Developers, Inc. (AFCD)
- Phi Kappa Phi National Honor Society
- Fort Braden Elementary School, Volunteer

RECOGNITION

- *Legal 500 United States*, 2008, Listed
- Florida American Planning Association "Excellence in Planning" Award Recipient for co-authoring *Ocala Historic Preservation Element*
- Edward McClure Award for Academic Excellence

PUBLICATIONS

- "What's Developing | Winter 2024," Stearns Weaver Miller News Update, January 31, 2024
- "Spring Brings an End to Freezing Temperatures—and an Opportunity to Extend Your Development Permits," Stearns Weaver Miller News Update, April 29, 2022
- "City of Tallahassee Proposes 'Glitch' Revisions to Land Development Code," Stearns Weaver Miller News Update, September 30, 2021
- "COVID-19 State of Emergency Lapses: Extend Your Permits NOW," Stearns Weaver Miller News Update, July 14, 2021
- "Tolling and Extension Benefits Available for Pandemic Emergency Declarations," Stearns Weaver Miller News Update, July 20, 2020
- "Governor DeSantis Terminates Emergency Declaration for 43 Counties Starting 90-Day Clock for Important Notice Letters," Stearns Weaver Miller News Update, October 22, 2019

STEARNS WEAVER MILLER

Kenneth B. Metcalf – 8

- "Important Land Development and Environmental Issues Following Florida's 2019 Legislative Session," Stearns Weaver Miller News Update, July 16, 2019
- "Opportunities Ahead as Florida Prepares for Three New Tollways," Stearns Weaver Miller News Update, May 2019
- "What's Developing | Spring 2019," Stearns Weaver Miller News Update, April 2019
- "Why Developers and Landowners Should Engage in the U.S. Census Bureau's Designation of Places and Census Tracts Over the Next Three Months," Stearns Weaver Miller News Update, February 2019
- "Act Now to Secure Tolling and Extension Benefits Related to Hurricanes, Algal Blooms and Red Tide Emergency Declarations," Stearns Weaver Miller News Update, January 25, 2019
- "Important Land Development and Environmental Issues Following Florida's 2018 Legislative Session," Stearns Weaver Miller News Update, April 27, 2018
- "Back to Local Control Over Growth Management: HB 1151 Eliminates State and Regional Review Requirements for Existing Developments of Regional Impact (DRI) and Other Large Projects in Florida," Stearns Weaver Miller News Update, April 26, 2018
- "Important Land Development and Environmental Issues Following Florida's 2018 Legislative Session," Stearns Weaver Miller News Update, March 26, 2018
- "Opportunities for Permit Extensions Available – But Claiming Them Not Always Straightforward," Stearns Weaver Miller News Update, January 30, 2018
- "What's Developing | Fall 2017," Stearns Weaver Miller News Update, December 20, 2017
- "What's Developing | Summer 2017," Stearns Weaver Miller News Update, September 18, 2017
- "State of Emergency for Tropical Storm Emily Presents Another Opportunity to Extend Permits, As Previous Opportunity Comes to a Close," Stearns Weaver Miller News Update, August 4, 2017
- "Important Land Development and Environmental Issues Following Florida's 2017 Legislative Session," Stearns Weaver Miller News Update, July 7, 2017
- "Executive Orders Present Opportunities to Extend the Duration of Qualified Development Permits Across Florida," Stearns Weaver Miller News Update, October 5, 2016

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Kenneth B. Metcalf – 9

- "Golf Course Redevelopment Team Update: National and Florida Trends and Recent Local Government Regulatory Responses," Stearns Weaver Miller News Update, July 20, 2016
- "Executive Orders Present Opportunities to Extend Development Permits in 36 Florida Counties," Stearns Weaver Miller News Update, July 1, 2016
- "Governor's Executive Orders Present Opportunities To Extend Expiration Of Development Permits," Stearns Weaver Miller News Update, September 9, 2015

RECENT PRESENTATIONS

- "The Evolution of Transportation, Infrastructure, and Resiliency Efforts," Florida Chamber's Annual 37th Environmental Permitting Summer School, July 20, 2023
- "Improving Coastal Residency in Response to the Threats of Sea Level Rise and Climate Change - Part II," "Emerging Trend in Transportation: How Do We Get There from Here?" Florida Chamber's 36th Annual Environmental Permitting Summer School, July 20, 2022
- "Emerging Trends In Transportation Planning and Infrastructure: How Do We Get There From Here?," and "Dodging Transportation Potholes," Florida Chamber's Annual Environmental Permitting Summer School, 2016-2022
- "Planning for Sea Level Rise and the Peril of Flood from the Local, Regional, and State Perspective," American Planning Association Florida Annual Conference, September 11, 2019

Supporting Analysis for Proposed Text Amendment and Determination of Consistency with Applicable Statutory Requirements

Martin County's Comprehensive Plan prescribes a particular methodology (Section 1.7 and Policies 4.1D.2-4.1D.7), including specific data and analysis requirements, for projecting housing demand and determining the residential capacity or potential supply of housing units based on the adopted future land use map designations. Generally referred to as a *needs assessment*, the purpose of the methodology is to determine whether a comprehensive plan amendment is needed to expand the Primary or Secondary Urban Service Districts to accommodate future population growth.

The following analysis supports the need for a text amendment to the Martin County Comprehensive Plan to ensure that Martin County's evaluation of proposed comprehensive plan amendments to increase residential supply is consistent with applicable statutory requirements. Please refer to the Proposed Text Amendment Concept on the final page of this analysis, which describes in concept the scope of a Proposed Text Amendment. The applicant proposes to work with staff to further develop those concepts and draft a strike-through/underline amendment to fully implement the requirements of Section 163.3177, F.S. As further explained, the current methodology specified in the Martin County Comprehensive Plan is not consistent with statutory requirements regarding how comprehensive plan amendments must be evaluated, including the following requirements:

- 1) Section 163.3177(1) – The plan shall establish meaningful and predictable standards for the use of land and development. Martin County's policies (Section 1.7 and Policies 4.1D.2-4.1D.7) regarding the evaluation of land use to accommodate growth do not address or otherwise conflict with the statutory requirements cited below.
- 2) 163.3177(1)(f) – Plan amendments shall be based upon relevant and appropriate data available at the time of plan amendment adoption. Martin County's policies preempt use of such data.
- 3) Section 163.3177(1)(f)(2) - Local governments may not require a particular methodology to the exclusion of other professionally accepted methodologies. Martin County's policies prescribe a particular methodology and do not allow for consideration of alternative, professionally acceptable methodologies.
- 4) Section 163.3177(6)(a)2 – Plan amendments shall be based on surveys, studies and data, including the amount of land required to accommodate anticipated growth, taking into account considerations related to the character of undeveloped land, need for redevelopment, economic considerations (job creation, capital investment and economic diversification), and the need to modify antiquated land use patterns. Martin County's policies and prescriptive methodology do not account for these considerations and preempt the ability to consider such data.
- 5) Section 163.3177(6)(a)4 – The amount of land designated for planned uses shall provide a balance of uses that foster vibrant, viable communities and economic development

opportunities, address outdated development patterns, such as antiquated subdivisions, and should allow for the operation of the real estate market. Martin County's policies and prescriptive methodology do not account for these considerations and preempt the ability to consider relevant data pertaining to these requirements.

- 6) Section 163.3177(6)(a)8.c – Future land use map amendments shall be based on an analysis of the minimum amount of land needed to achieve the above requirements.

The Martin County Comprehensive Plan should be amended to allow for professionally accepted methodologies for collecting and analyzing data rather than maintaining the current policies that are prescriptive, preempt the ability to collect and analyze data available at the time of adoption of plan amendments and that do not implement the statutory requirements established by the Community Planning Act. Martin County is unique in mandating a particular methodology and limiting the scope of data and related analysis that may be undertaken in support of a Comprehensive Plan amendment. We have not identified any other local government in Florida that mandates a specific methodology in the Comprehensive Plan for a needs assessment or that preempts consideration of best available data. Rather, local governments typically provide principles to guide the evaluation based on statutory requirements. Martin County's prescriptive approach as well as particular requirements of its methodology contravene the statutory requirements listed above as further explained in the following, more detailed analysis:

- 1) **Section 163.3177(1)(f)2, F.S.**, states in part:

“The application of a methodology utilized in data collection or whether a particular methodology is professionally accepted may be evaluated. However, the evaluation **may not include whether one accepted methodology is better than another.**” (emphasis added)

This important statutory requirement recognizes that Comprehensive Plan amendments may be supported by more than one methodology, that the Comprehensive Plan should not require the use of one methodology to the exclusion of other methodologies and that local governments should not limit the scope of data and supporting analysis through limitations embedded in a particular methodology in determining whether a Comprehensive Plan amendment is warranted. Sections 1.7 and 4.1D.2-4.1D.7 of the Martin County Comprehensive Plan require a particular methodology and inappropriately preempt consideration of data available at the time of future plan amendments. Martin County acknowledged this problem to a point in 2017 when it adopted amendments to its methodology due to staff concerns that the methodology at that time did not clearly allow for consideration of American Community Survey data. However, the Comprehensive Plan still mandates a prescriptive methodology and dictates use of certain data to the exclusion of other professionally accepted methodologies and other available data, including data that may be generated during the review of a proposed Comprehensive Plan amendment. It also fails to consider all required statutory factors in determining housing demand and housing supply.

2) In regard to data and supporting analysis, Section 163.3177(1)(f) states in part:

“...plan amendments shall be based upon **relevant and appropriate data and an analysis** by the local government that may include, **but not be limited to**, surveys, studies, community goals and vision, and **other data available at the time of adoption of the comprehensive plan or plan amendment**. To be based on data means to **react to it in an appropriate way and to the extent necessary indicated by the data** available on that particular subject **at the time of adoption of the plan or plan amendment at issue.**” (emphasis added)

This provision requires that local governments consider all relevant data available at the time of plan amendment adoption, that the analysis evaluate the data to determine its relevancy in relation to the subject or issue addressed by the proposed plan amendment and that the plan amendment react appropriately based on the data and supporting analysis. The Comprehensive Plan preempts the ability to consider all relevant data at the time of plan amendment adoption. For example, Section 1.7.C(4) mandates that all vacant housing exceeding a 3% vacancy rate must be counted as available supply. The 3% vacancy threshold is based on recommendations from a 2004 publication¹ that was generalized in nature and did not consider data applicable to Martin County. This mandated policy requirement is not based on relevant and appropriate data that should be considered at the time of future plan amendment adoption, preempts the ability to consider whether 3% is appropriate at the time of future plan amendment adoption, and preempts the ability to consider other data, such as vacancy by type, at the time of future plan amendment adoption.

The prescribed methodology also makes a simplifying assumption that the percentage increase in future housing demand will be equal to the percentage increase in future permanent population over a given projection period. Hence, it projects future permanent housing units for a future year by multiplying existing housing units by the projected percentage increase permanent population over the projection period. It is unnecessary and inappropriate to assume that housing and the permanent population will increase by the same percentage. By requiring this assumption, the methodology does not allow for the use of available data at the time of plan amendment adoption to calculate actual housing growth rates and to consider other related variables, such as persons per household.

3) Section 163.3177(6)(a)8.c, F.S., further addresses analysis requirements for proposed future land use map amendments. It states:

¹ The 2013 Residential Capacity and Vacant Land Analysis, dated August 2013, cites Planner’s Estimating Guide, Projected Land-Use and Facility Needs, pages 24-25, Arthur C. Nelson, FAICP, 2004.

8. Future Land use map amendments shall be based upon the following analyses:

- c. An analysis of the minimum amount of land needed to achieve the goals and requirements of this section. [i.e., Section 163.3177]

This should be the starting point for evaluating proposed future land use amendments, including the analysis requirements for determining the allocation of land uses, densities and intensities to accommodate future growth in the community. In this respect, the statute calls for a holistic approach in determining community needs, taking into account more than just projected population. In addition to the data and analysis requirements specified above, this provision is further implemented by Sections 163.3177(6)(a)4 and 163.3177(6)(a)2, which address the scope of issues that must be evaluated in considering future land use map amendments in response to community needs.

4) Section 163.3177(6)(a)4, F.S., states in part:

The amount of land designated for future planned uses shall provide a balance of uses that foster vibrant, viable communities and economic development opportunities and address outdated development patterns, such as antiquated subdivisions. The amount of land designated for future land uses should allow the operation of real estate markets to provide adequate choices for permanent and seasonal residents and business and **may not be limited solely by the projected population.**” (emphasis added)

This provision makes clear that the amount of land designated for future land uses should take into account how the real estate market operates in providing adequate housing choices and non-residential business opportunities. This is particularly applicable in considering the differences in the real estate market by sub-area within the County. The County’s policies distinguish between the Indiantown area and the balance of the unincorporated area. However, the County’s prescribed methodology does not allow for further evaluation of subareas within the balance of the unincorporated area. For example, the demand and supply for development within the CRA differ from suburban locations. In addition, the methodology does not account for demand and supply for different types of dwelling units and for varying price points or by tenure to distinguish between owned and rented dwelling units. Rather, the methodology aggregates all types of permanent dwelling units for the purpose of determining available supply. Similarly, the methodology does not consider fundamental differences in development form that impact the marketability of developments. For example, in calculating demand and supply, the methodology does not make any distinction between the market demand and potential supply for high density, urban infill locations/development form as compared to larger scale, greenfield suburban locations conducive for lower density, single family subdivisions. Similarly, the methodology does not make any distinction between market demand for new urbanism/TND type developments and conventional suburban development form. All of these distinctions are important in considering how the real estate market responds to demand for different types and

forms of development. The County methodology essentially takes a *one size fits all* approach that is not consistent with the overall intent and specific requirements of the statute.

- 5) Section 163.3177(6)(a)2, F.S., furthers the direction provided above by specifying that the supporting analysis for plan amendments must take into account various factors that relate to the operation of the real estate market. It states:

The future land use plan and plan amendments shall be based on surveys, studies, and data regarding the area, as applicable, including (relevant cites from paragraph 2):

- a. The amount of land required to accommodate anticipated growth.
- b. The projected permanent and seasonal population of the area.
- c. The character of undeveloped land.
- e. The need for redevelopment, including the renewal of blighted areas and the elimination of nonconforming uses which are inconsistent with the character of the community.
- i. The need for job creation, capital investment, and economic development that will strengthen and diversify the community's economy.
- j. The need to modify land uses and development patterns within antiquated subdivisions.

Section 1.7 mandates a prescriptive methodology that limits consideration of proposed comprehensive plan amendments based on whether projected housing supply in the unincorporated area would exceed projected housing demand based solely on the 10-year population projection without consideration for how the above factors impact housing demand and potential supply. While the Comprehensive Plan must be based on projected population, it must also account for each of the factors listed above and other considerations that may become evident in analyzing the operation of the real estate market at the time of plan amendment adoption.

Character of Undeveloped Land and Assumption of Maximum Density. The character of undeveloped land is an important consideration in determining the potential supply. This requirement must also be considered in relation to Section 163.3177(1), F.S., which requires that the Comprehensive Plan provide meaningful and predictable standards and guidelines for more detailed land development regulations. The Comprehensive Plan and implementing land development regulations specify development standards that ultimately impact the extent to which land is developed in Martin County. These requirements include density and intensity limitations, land use compatibility, stormwater management, open space, buffers, streets/driveways, parking, concurrency, and environmental limitations such as wetlands, floodplains and upland habitats. The real estate market responds to these requirements by typically not developing to the maximum allowable density and intensity. The Comprehensive

Plan makes clear that it may not be possible to achieve maximum density and intensity, and development trends document that Martin County is developing well below maximum thresholds due to the operation of the real estate market in responding to policy/regulatory development constraints. Taking these limitations into account, the amount of acreage included in the Primary Urban Service Area and Secondary Urban Service Area to accommodate future growth should be based on the established trend in regard to the percentage of maximum density and intensity achieved rather than the maximum density or intensity specified for each land use category. The analysis of supply should not be a theoretical exercise, but rather a reasonable forecast of anticipated density and intensity based on actual trends documented by data available at the time of plan adoption.

Section 1.7.C(1) requires that the supply or capacity of lands must be based on the maximum density and intensity allowed by the future land use categories without regard for how the real estate market responds to development constraints. The only adjustment applies to wetlands whereby Section 1.7.C(1) requires 50% of the density standards to be utilized within wetlands. However, Objective 9.1.G of the Conservation Element provides extensive regulations prohibiting development within wetlands with limited exceptions. While these policies allow for the transfer of 50% of the density from wetland areas, the ability to utilize the transferred density within uplands is limited by other development standards set forth in the wetland protection policies. Rather than assuming that 50% of wetland density should be included in the supply calculation, the trend should be utilized by documenting the actual percentage of wetland density utilized on uplands. Section 1.7 assumes unrealistic development potential when considering the operation of the real estate market in responding to the County's policy and regulatory development standards. This same concern applies for development within Mixed Use Overlays or any category that permits mixed use. The assumption of maximum density preempts the ability to calculate the actual percentage of maximum density achieved over the past 15 year period preceding a proposed future land use map amendment. This is another example of the County's methodology not allowing for the use of available data at the time of plan amendment adoption.

Antiquated Subdivisions. The same concern applies in calculating supply within established subdivisions. Section 1.7.C(2) requires all vacant lots to be counted in calculating supply. However, this requirement ignores the operation of the real estate market and fails to account for the actual absorption rate occurring within established subdivisions. This is particularly concerning for older, antiquated subdivisions that are developing at a slow rate of absorption. By assuming unrealistic development potential within the projection period, the County's policy impedes the operation of the real estate market by constraining the ability to develop new residential projects that respond to market preferences. In effect, the County's policy limits the choices available in the marketplace in contravention to Sections 163.3177(6)(a)4 and 163.3177(6)(a)2.j. The County's methodology overstates the actual supply achieved by these subdivisions within a 15 year period and is based on the unrealistic assumption that every single subdivision in Martin County will build out within 15 years, which would have already occurred for subdivisions established more than 15 years ago if the County's assumption were accurate.

This faulty assumption preempts the ability to calculate the actual rate of absorption over the past 15 year period preceding a proposed future land use map amendment. This is another example of the County's methodology not allowing for the use of available data at the time of plan amendment adoption.

Job Creation, Economic Diversification and Capital Investment. The County's methodology should also consider the spatial relationship of residential and non-residential uses in evaluating future land use amendments. Residential use provides labor supply to support non-residential development, and proximity achieves various advantages identified in the Comprehensive Plan, including discouragement of urban sprawl, reduction in trip length and promoting multimodal mobility options. It is also important to recognize that housing choices and relative prices points relate to the occupation/skills of workers residing in those homes. This is another spatial consideration that warrants further evaluation. In addition, the methodology in calculating demand rates and supply should allow for the evaluation of development patterns to determine whether significant differences occur in marketing and developing mixed use areas as compared to more isolated single family subdivisions. This is another distinction where it may be appropriate to distinguish subareas of the County to the extent that demand and supply vary in comparing areas with a balance or mix of uses as compared to areas developed with residential at significant distances from non-residential uses.

Scope of Proposed Text Amendment

The preceding analysis supports the need for a comprehensive plan amendment to amend Policy 1.7 and Policies 4.1D.2-4.1D.7 to accomplish the following objectives to achieve consistency with statutory requirements:

- 1) Avoid a prescriptive methodology and allow for consideration of alternative methodologies that are professionally accepted;
- 2) Avoid preempting consideration of data available at the time of plan amendment adoption;
- 3) Avoid adoption of specific data requirements, such as the 3% vacancy allowance, as part of a methodology;
- 4) Avoid assumptions that are not consistent with actual development trends, such as assuming that housing demand increases by the same percentage as population demand, requiring maximum development in calculating supply and assuming buildout of subdivisions within 15 years; and
- 5) Allow for methodologies that account for the operation of the real estate market and account for differences in demand and supply based on unit type, relative affordability, development form, location/subarea characteristics and other variables affecting demand rates and realized supply. This is particularly important, considering the long term development anticipated for the buildout of the 4,200 dwelling units approved for the Pineland Prairie development, which is planned as a traditional neighborhood development. As such, it will cater to a different market segment as compared to

conventional, single-family subdivisions. Based on the significant difference in development form, it would be appropriate to segment this type of development form in recognition that it will provide supply for only a segment of the population demand. In addition, the scale of the development requires phasing, which should be further evaluated to consider an appropriate absorption rate. It would not be consistent with Section 163.3177, F.S., to assume that the supply from Pineland Prairie would serve the same market segment as conventional, single family subdivisions. The applicant proposes to work with staff to develop an appropriate methodology for segmenting the market analysis and to calculate an absorption rate that reflects the phasing and other prerequisite conditions that will impact the supply that will be realized over the next 15 year period.

In addition, Martin County should reconsider its approach in reserving a portion of capacity for the agricultural area based on the percentage of Certificates of Occupancy issued for the unincorporated area outside of the urban service districts. This approach encourages subdivisions at one unit per five acres, which is an inherently inefficient land use pattern. It would be preferable to allocate all supply to the urban service districts and to regulate development within agricultural areas separately without limiting the ability of the urban service area to accommodate projected demand for urban development.

Proposed Text Amendment Concept:

Amend Section 1.7 and Policies 4.1D.2 through 4.1D.7 to allow staff to prepare demand and supply calculations based specifically on the requirements of Section 163.3177, F.S., and delete all prescriptive requirements. The amendment should specify that a future land use map amendment shall be based on data available at the time of adoption of a comprehensive plan amendment and shall be analyzed using a professionally accepted methodology for calculating demand and supply for the unincorporated area. The amendment should explicitly allow for an applicant to submit a study utilizing a professionally accepted methodology to support the proposed future land use map amendment.

The applicant proposes to work with staff to further develop this approach and to draft a proposed text amendment to achieve the objectives set forth in this analysis.

CPA 21-11
Kanner/96th Street Investments LLC
Comprehensive Growth Management Plan
Text Amendments

April 3, 2023
(revised 3-25-24; 12-23-24)

NOTE: Proposed deleted text revisions are ~~struck-through~~ and added text is underlined for clarity.

Chapter 4 – Future Land use Element

Policy 4.1B.2. Analysis of availability of public facilities. All requests for amendments to the FLUMs shall include a general analysis of (1) the availability and adequacy of public facilities and (2) the level of services required for public facilities in the proposed land uses. This analysis shall address, at a minimum, the availability of category A and category C service facilities as defined in the Capital Improvements Element. No amendment shall be approved unless present or planned public facilities and services will be capable of meeting the adopted LOS standards of this Plan for the proposed land uses. The Capital Improvements Element or other relevant plan provisions and the FLUMs may be amended concurrently to satisfy this criterion. The intent of this provision is to ensure that the elements of the CGMP remain internally consistent.

Compliance with this provision is in addition to, not in lieu of, compliance with the provisions of Martin County's Concurrency Management System. When a map amendment is granted under this provision, it does not confer any vested rights and will not stop the County from denying subsequent requests for development orders based on the application of a concurrency review at the time such orders are sought.

Martin County may adopt sub-area development restrictions for a particular site where public facilities and services, such as arterial and collector roads, regional water supply, regional wastewater treatment/disposal, surface water management, solid waste collection/disposal, parks and recreational facilities, and schools, are constrained and incapable of meeting the needs of the site if developed to the fullest capacity allowed under Goal 4.13 of this Growth Management Plan. The master or final site plan for a site that is subject to such sub-area development restrictions shall specify the maximum amount and type of development allowed. Sub-area development restrictions apply to the following sites:

(?) The following restrictions shall be applied to the tract of real property designated as Low Density Residential on the Future Land Use Map and described in Ordinance No. ????.

(a) Residential units shall be limited to a maximum of 1,050 units.

(b) Prior to the issuance of the 100th building permit, a monetary contribution of \$1000 per residential unit shall be donated to the Martin County Community Land Trust to address variable housing needs throughout the County.

(c) All future applications for development approval shall be processed as a Planned Unit Development (PUD).

(d) The owner/developer shall plan and appropriately fund public facilities consistent with Policy 14.1B.2, which requires that future development pay the full cost of capital facilities needed to address the impacts of such development. This shall include an amendment to the Capital Improvements Element, if needed, and a PUD Agreement and/or Development Agreement that addresses public facilities, infrastructure and the timing of development.

Policy 4.7A.3.(9); Policy 4.7A.3.1.(3) and Policy 4.7A.14. (9)

The following language in Policy 4.7A.3.(9); Policy 4.7A.3.1.(3) and Policy 4.7A.14. (9), that pertains to the existing Industrial land use within the Freestanding Urban Service District will not be applicable once the area is included in the Primary Urban Service District and should therefore be deleted for consistency:

~~The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. Number 1153 and Ordinance 1210, less and except property described in Ordinance 1208~~

Policy 4.1D.2. Population technical bulletin. Martin County shall annually produce a population technical bulletin based on data provided by the Office of Economic and Demographic Research (EDR) and the Bureau of Economic and Business Research (BEBR). The medium EDR BEBR estimate for the unincorporated area population shall be the basis for the Population Technical Bulletin. The following standards shall be used in calculating population projections through a Population Technical Bulletin adopted annually by the County Commission:

(1) Methodology must be clear and available for public review. Any change in methodology must be approved by the county commission prior to the preparation of the report.

(2) Unless there is clear evidence to the contrary, the ~~EDR~~ BEBR medium population projections for Martin County shall be used. The ~~EDR~~ BEBR provides estimates for permanent population. The permanent population shall be as calculated ~~and~~ provided by the ~~EDR~~ BEBR and the US Census.

(3) Municipal permanent population shall be subtracted from total county permanent population to arrive at the estimate for total permanent population for the unincorporated area. Based on this calculation, the most recent 5-year average percent of total permanent population in the unincorporated area shall be applied against the BEBR medium population projections for Martin County to determine future permanent population for the unincorporated area. The population Technical Bulletin shall show what portion of the permanent population is housed in ~~residential~~ occupied housing units or households.

(4) Peak population in ~~residential~~ occupied housing units or households and peak population for LOS determination shall be calculated as outlined in Sections 1.7D and 1.7 E.

Policy 4.1D.3 Future residential housing unit demand.

Future housing demand projections shall be based on all of the following:

(1) The demand for future ~~residential occupied~~ housing units ~~or households~~ in the unincorporated area shall be based on the percentage increase in permanent population projected by the Population Technical Bulletin.

(2) Occupied housing units (HO) are classified by the Census, as a housing unit is occupied if a person or group of persons is living in it at the time of the Census interview or if the occupants are only temporarily absent, as for example, on vacation. The persons living in the unit must consider it their usual place of residence or have no usual place of residence elsewhere. The number of occupied housing units (HO) is the same as the number of households ~~those residential housing units in use by permanent population.~~ Vacant seasonal housing units (HS) are classified ~~by the Census~~ as those ~~residential~~ housing units ~~intended for occupancy only during certain seasons of the year that are seasonally occupied by residents who spend less than 6 months of the year in Martin County.~~ American Community Survey Data shall be used as source data between Decennial Census years.

~~(3) Permanent and seasonal population in residential housing is served by housing units in actual use (HU).~~

~~Housing units in actual use (HU) equals the occupied housing units (HO) plus vacant seasonal housing units (HS).~~

$$HU = HO + HS$$

~~(4) Vacant housing not in seasonal use shall not be used in calculating housing unit demand, but shall be used in calculating supply. Hotel/motel units shall not be used in calculating residential housing demand.~~

~~(5) The projected demand for housing units in the future shall be determined by dividing the projected, permanent population (housing), as defined in [Chapter 2](#), by the permanent population (housing). American Community Survey Data shall be used as source data between Decennial Census years.~~

~~Projected permanent population (housing)/Permanent population (housing) = percentage increase in demand.~~

~~(6) This percentage increase in demand multiplied by the housing units in actual use (HU) in the most recent census year equals the projected housing unit need in the future period.~~

~~Percentage increase in demand x HU = projected housing unit demand.~~

~~(73) Future residential housing needs shall be updated every five years.~~

Policy 4.1D.4. Distribution of housing unit demand.

(1) The percentage of residential housing demand that will be met outside the urban service districts shall be based on the average number of certificates of occupancy for housing units built in the preceding five years, based on the "Actual Year Built" as reported in the most recent final Martin County Tax Roll. The number of housing units built ~~Certificates of Occupancy~~ outside the urban service districts shall be divided by the total number of ~~Certificates of Occupancy~~ housing units built for the unincorporated area to determine the appropriate percentage.

(2) The remainder of residential housing demand must be met within the Primary and Secondary Urban Service Districts.

Policy 4.1D.5 Residential capacity analysis. Martin County shall produce a residential capacity analysis every five years. Residential capacity defines the available residential development options within the Primary and Secondary Urban Service Districts that can meet the demand for population growth consistent with the Future Land Use Map. Residential supply shall consist of:

(1) Vacant property that allows residential use according to the Future Land Use Map. To account for land development regulations that restrict residential density, 75% of the maximum allowable density shall be used in calculating the number of available units on vacant non-agricultural upland acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be one half zero. The maximum allowable density for properties that are more than 50% inundated by wetlands shall be 75% of the maximum density of a given future land use designation and shall apply only to the upland portion of the property. The maximum allowable density for properties which contain wetlands but are less than 50% inundated by wetlands shall be one-half of the maximum density of a given future land use designation.

~~(2) Subdivided single family and duplex lots. The following lot types shall be included in the residential capacity calculation:~~

~~(a) Vacant single family or duplex lots of record as of 1982 developed prior to the County's tracking of development approvals.~~

~~(b) Vacant single family or duplex lots of record platted after 1982.~~

(2) Best management practices and forecasting models shall be employed to consider location factors and infrastructure constraints that affect the development and timing of vacant residential land.

~~(3) Potential for residential development in Mixed-Use overlays and the CRA Center and CRA neighborhood future land use designations shall be based on actual development approved residential developments where development activity is actively underway (site development, infrastructure and/or amenity construction, housing unit construction) and historical trends.~~

~~(4) Excess vacant housing not in use by permanent or seasonal residents. Excess vacant housing is a vacancy rate higher than 3% of the number of housing units in actual use. American Community Survey Data shall be used as source data between Decennial Census years.~~

The 15 year planning period for residential capacity began with the 2010 Census and shall be updated to a new 15 year planning period every 5 years. The residential capacity analysis showing the total residential supply within the Primary and the Secondary Urban Service Districts shall be compared to the projected residential demand as outlined in Policy 4.1D.3 and 4.1D.4 above. The report shall show demand and supply comparisons for a ten year period as well as for the 15 year planning period.

Policy 4.1D.6 The residential capacity analysis will determine if the future demand for residential units exceeds the supply for residential units as provided in the residential capacity analysis.

When the undeveloped residential acreage within either the Primary Urban Service District or the Secondary Urban Service District no longer provides for projected population growth for the fifteen year planning period, planning for expansion of residential capacity shall commence. When the undeveloped acreage within either the Primary Urban Service District or the Secondary Urban Service District provides for no more than 10 years of projected population growth, the County is required to expand capacity.

Chapter 1 - Preamble

Section 1.7. - Supporting Data

The CGMP shall be based on analysis of the best available data on past trends, existing characteristics and future projections of the County's population, housing, land use and economic and natural resources. These data shall be maintained as public information filed in the Growth Management Department. The data shall be updated as required by state statute, and local ordinance.

Various elements of the CGMP—such as Future Land Use, Housing, and Capital Improvements—are directly based on population data. The appropriate resident and seasonal population figures are critical to the local government in assessing future needs for housing units, the adequacy of housing supply, and the need for services and facilities.

1.7.A. Population estimates. Assumptions used in the CGMP are based on Martin County population estimates and projections. These in turn are based on the Office of Economic and Demographic Research (EDR) and Bureau of Economic and Business Research (BEBR) estimates and projections.

The following standards shall be used in calculating population projections through a Population Technical Bulletin adopted annually by the County Commission:

- (1) Methodology must be clear and available for public review. Any change in methodology must be approved by the County Commission prior to the preparation of the report.
- (2) The base data for population estimates and projections comes from the U.S. Decennial Census. In between decennial Census years, the Office of Economic and Demographic Research (EDR) and Bureau of Economic and Business Research (BEBR) provides annual updates to the estimates and projections. In the years in between the decennial Census, the permanent population estimates and projections provided by EDR and BEBR shall be used in the annual update to the Population Technical Bulletin to project permanent and seasonal population for the unincorporated portion of Martin County for the planning horizon of the Plan.
- (3) Municipal permanent population shall be subtracted from total county permanent population to arrive at the estimate for total permanent population for the unincorporated area. Based on this calculation, the most recent 5-year average percent of total permanent population in the unincorporated area shall be applied against the BEBR medium population projections for Martin County to determine future permanent

population for the unincorporated area. The Population Technical Bulletin shall show what portion of the permanent population is housed in residential occupied housing units or households.

(4) Peak population in residential occupied housing units or households and peak population for level of service determination shall be calculated as outlined in Sections 1.7.D. and 1.7.E., CGMP. below.

(5) See [Chapter 2](#) for definitions of population terms used in the text of the Plan.

1.7.B. *Housing unit demand projection*. Projections of housing demand are based on expected increases in permanent population for the unincorporated area and shall be based on calculations described below:

(1) The demand for future residential occupied housing units or households in the unincorporated area shall be based on the percentage increase in permanent population projected by the Population Technical Bulletin for occupied housing units or households plus the percent increase in vacant housing units, as a percent of total housing units.

(2) Occupied housing units (HO) are classified by the Census, as a housing unit is occupied if a person or group of persons is living in it at the time of the Census interview or if the occupants are only temporarily absent, as for example, on vacation. The persons living in the unit must consider it their usual place of residence or have no usual place of residence elsewhere. The number of occupied housing units (HO) is the same as the number of households those residential housing units in use by permanent population. Vacant seasonal housing units (HS) are classified by the Census as those residential housing units intended for occupancy only during certain seasons of the year that are seasonally occupied by residents who spend less than 6 months of the year in Martin County. American Community Survey Data shall be used as source data between Decennial Census years.

~~(3) Peak population in residential housing is served by housing units in actual use (HU).~~

~~Housing units in actual use (HU) equals the occupied housing units (HO') plus vacant seasonal housing units (HS).~~

$$HU = HO + HS$$

~~(4) Vacant housing not in seasonal use shall not be used in calculating housing unit demand, but shall be used in calculating supply. Hotel/motel units shall not be used in calculating residential housing demand.~~

~~(5) The projected demand for housing units in the future shall be determined by dividing the projected, permanent population (housing), as defined in [Chapter 2](#) by the permanent population (housing) identified. American Community Survey Data shall be used as source data between Decennial Census years.~~

~~Projected permanent population (housing)/Permanent population (housing)= percentage increase in demand.~~

~~(6) This percentage increase in demand multiplied by the housing units in actual use (HU) equals the projected residential housing unit need in the future period. American Community Survey Data shall be used as source data between Decennial Census years.~~

~~Percentage increase in demand × HU = projected housing unit demand.~~

~~(7) The eastern Urban Service District and the Indiantown Urban Service District shall be considered separately.~~

1.7.C. *Residential capacity calculations.* Residential capacity represents the capacity for residential development within each of the urban service districts to meet the projected population needs for the 15 year planning period. The calculation of residential capacity within each of the urban service districts shall include:

(1) Vacant property that allows residential use according to the Future Land Use Map. To account for land development regulations that restrict residential density, 75% of the maximum allowable density shall be used in calculating the number of available units on vacant non-agricultural upland acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be one half zero. The maximum allowable density for properties that are more than 50% inundated by wetlands shall be 75% of the maximum density of a given future land use designation and shall apply only to the upland portion of the property. The maximum allowable density for properties which contain wetlands but are less than 50% inundated by wetlands shall be one-half of the maximum density of a given future land use designation.

(2) Best management practices and forecasting models shall be employed to consider location factors and infrastructure constraints that affect the development and timing of vacant residential land.

~~(2) Subdivided single family and duplex lots. The following lot types shall be included in the residential capacity calculation:~~

~~(a) Vacant single family or duplex lots of record as of 1982 developed prior to the County's tracking of development approvals.~~

~~(b) Vacant single family or duplex lots of record platted after 1982.~~

~~(3) Potential for residential development in Mixed Use overlays and the CRA Center and CRA neighborhood future land use designations shall be based on actual development approved residential developments where development activity is actively underway (site development, infrastructure and/or amenity construction, housing unit construction) and historical trends.~~

~~(4) Excess vacant housing not in use by permanent or seasonal residents. Excess vacant housing is a vacancy rate higher than 3% of the number of housing units in actual use. American Community Survey Data shall be used as source data between Decennial Census years.~~

~~(5) The eastern Urban Service District and the Indiantown Urban Service District shall be considered separately.~~

1.7.D. *Peak population in occupied housing units for the unincorporated area.* The number of residents living in occupied housing units or households, and the number of occupants of Vacant seasonal housing units in Martin County equals peak population (housing). It is calculated by adding permanent population (housing) and the seasonal population (housing) to determine the total demand for occupied and vacant seasonal housing units.

1.7.E. *Peak and weighted average population for Level of Service determination (LOS).* Peak and weighted average population for LOS for library collections, corrections, solid waste, and bicycle and pedestrian pathways as outlined in [Chapter 14](#) shall be calculated as follows:

(1) Permanent population for the unincorporated area including prisoners and group homes, shall be derived from EDR or BEBR.

(2) Seasonal population (facility) for the unincorporated area shall include seasonal population (housing) plus part-time inhabitants who use, or may be expected to use, public facilities or services, but are not residents. This includes tourists, migrant farm workers, and other short- term and long term visitors. Hotel motel population in the peak five months of the year for the unincorporated area shall be determined by using hotel occupancy data and hotel bed tax collections to estimate the average number of vacationers.

(3) Permanent population plus seasonal population (facility) in the peak five months of the year shall equal the peak population (facility) for the unincorporated area. This data is then used to determine weighted average population for LOS determination.

(4) The weighted average population assumes that five months of the year are peak population and the remaining seven are permanent. The permanent and peak populations are weighed accordingly to produce the weighted average population estimates. This is done by multiplying the appropriate permanent population by seven, and the appropriate peak population by five, and dividing the total by twelve.

(5) Estimates and projections for the peak population and the weighted average population shall be calculated for countywide population and for unincorporated area population.

1.7.F. Every five years the staff shall analyze previous projections to determine the accuracy of the methodology and improve on it for future projections.

Cover Letter: Martin County Residential Capacity Analysis
March 2023 | Revised February 2024

GAI Consultants' Community Solutions Group ("CSG") was retained by Kolter Land to evaluate the capacity of residential lands within Martin County, Florida ("County"), with a focus on the unincorporated portion of the County to accommodate future residential demand. In conducting this Capacity Analysis, CSG evaluated each of the following which were produced by the County:

- ▶ 2017 Population Technical Bulletin ("2017 Bulletin")
- ▶ 2018 Residential Demand Analysis
- ▶ 2018 Vacant Land and Residential Capacity Analysis
- ▶ 2023 Residential Capacity Analysis

Fully replicating the specific procedures of the County's Comprehensive Plan as presented in the County's publications listed above is not possible due to data deficiencies and/or inconsistencies. While there are several deficiencies and inconsistencies noted throughout the complete Capacity Analysis prepared by CSG, two significant data deficiencies which prohibit replicating the specific procedures of the County's Comprehensive Plan are detailed below.

Data Deficiency 1

Policy 4.1D.2 of the County's Comprehensive Plan stipulates "Martin County shall annually produce a population technical bulletin based on data provided by the Office of Economic and Demographic Research ("EDR"). The 2017 Bulletin, and its required annual updates, are the foundation upon which the County's process for calculating and projecting future housing unit demand relies. Therefore, CSG submitted a formal request to the County for the most recent annual Bulletin. The County responded by providing copies of Bureau of Economic and Business Research ("BEBR") Projections of Florida Population by County for each of the years following 2017. However, said BEBR publication does not contain the same datasets as the 2017 Bulletin produced by the County. Specifically, the 2017 Bulletin produced by the County contained the following which are not included in BEBR's Projections of Florida Population by County:

- ▶ Estimates and Projections of Population for Unincorporated portion of the County
- ▶ Estimates and Projections of Population for municipalities within the County
- ▶ Estimates and Projections of Population for the 9 planning areas within the County
- ▶ Estimates and Projections of Population for Urban Service Districts within the County
- ▶ Estimates and Projections of Housing Units for Unincorporated portion of the County
- ▶ Estimates and Projections of Housing Units for municipalities within the County

- ▶ Estimates and Projections of Housing Units for the 9 planning areas within the County
- ▶ Estimates and Projections of Housing Units for Urban Service Districts within the County
- ▶ Estimates and Projections of Households for Unincorporated portion of the County
- ▶ Estimates and Projections of Households for municipalities within the County
- ▶ Estimates and Projections of Households for the 9 planning areas within the County
- ▶ Estimates and Projections of Households for Urban Service Districts within the County

Data Deficiency 2

Policy 4.1D.4 of the County's Comprehensive Plan states "...[the] percentage of residential housing demand that will be met outside the Urban Service Districts shall be based on the average number of certificates of occupancy for the preceding five years." CSG submitted a formal request to the County for Certificates of Occupancy (2017–2021) by location (i.e., PUSD, SUSD, outside the USD). However, the County responded to the request stating, "County is not able to provide the information based upon on the requested districts and we have no records showing this information".

Similar deficiencies and/or inconsistencies related to data sources were reconciled and/or replicated by CSG using alternative data sources, which are referenced and/or described within the relevant sections and/or appendices of complete Capacity Analysis prepared by CSG.

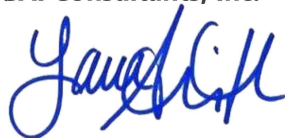
Findings

Kolter Land's Waterside development ("Project"), as proposed, is located adjacent to the Primary Urban Service District and is currently designated Agricultural according on the County's Future Land Use Map. Assuming the same seasonal and vacancy considerations contained in the Capacity Analysis prepared by CSG, the Project's 1,050 proposed units will provide at least 807 Households. In total, if the Project as proposed were included within the Primary Urban Service District and assigned an appropriate Future Land Use designation, then residential capacity in the Primary Urban Service District would increase from 101% to 114% in the 10-year planning period and would increase from 65% to 73% in the 15-year planning period. While the proposed Project alone will not absolve the County from their obligation to expand residential capacity, it can accommodate a significant portion of future residential demand.

Without regard to the particulars of the Project, the Capacity Analysis prepared by CSG is a very conservative one. It reflects the County's required procedures, while identifying other issues that would suggest the numbers, certainly, could be much higher than projected. The implications of CSG's conservative analysis are that the County will be substantively behind in its residential capacity to support new residential development unless steps are taken to become more timely and dynamic.

Sincerely,

GAI Consultants, Inc.



Laura Smith, MPA, FRA-RA
Associate, Urban Analytics Director

MARTIN COUNTY **RESIDENTIAL CAPACITY ANALYSIS**

MARTIN COUNTY, FLORIDA
MARCH 2023 | REVISED FEBRUARY 2024



MARTIN COUNTY RESIDENTIAL CAPACITY ANALYSIS

MARTIN COUNTY, FLORIDA
MARCH 2023 | REVISED FEBRUARY 2024

GAI's Community Solutions Group (CSG) is a cross-functional team of professionals who help create sustainable, livable places. We plan and design public spaces, sculpt landscapes and parks, reimagine streets and roads, and provide the regulatory and economic insight necessary to bring projects to life.

ACKNOWLEDGMENTS

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COMMUNITY
SOLUTIONS
GROUP

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GAI Consultants, Inc. on behalf of Kolter
Land Partners LLC.

KOLTERLAND

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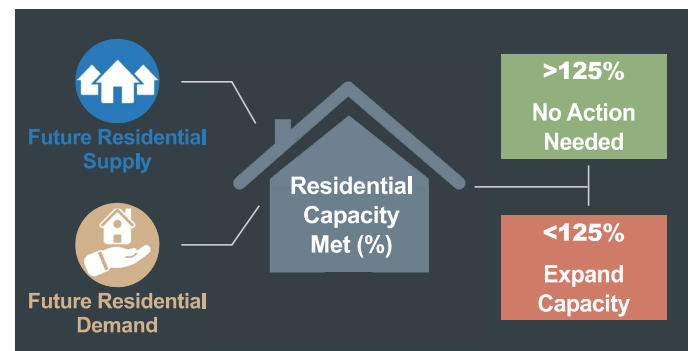
SUMMARY OF MAJOR FINDINGS

GAI Consultants' Community Solutions Group was retained by Kolter Land to evaluate the capacity of residential lands, with a focus on the unincorporated portion of Martin County, Florida ("County") to accommodate future residential demand. The Client has proposed a residential development called "Waterside" that is located on vacant land immediately adjacent to the Primary Urban Service District in unincorporated Martin County. The proposed Waterside PUD is directly behind the recently acquired Martin County Operations Center, which comprises approximately 30 acres, and the hugely successful South Florida Gateway PUD on approximately 200 acres. Both of these projects are located within a Free-Standing Industrial Urban Service District adjacent to SW Kanner Highway. At buildout, the South Florida Gateway PUD, which is currently under construction, will consist of approximately 3,000,000 square feet ("SF") of light industrial and limited retail uses, and the proposed Waterside PUD will consist of approximately 1,050 residential units on 375 acres.

A Residential Capacity Analysis is not required as part of any application(s) for amendment to the County's Comprehensive Plan. In 2023, the

County produced a Residential Capacity Analysis ("2023 Residential Capacity Analysis") as an update to both the 2018 Residential Demand Analysis and 2018 Vacant Land and Residential Capacity Analysis ("2018 Residential Capacity Analysis"). The 2023 Residential Capacity Analysis relies upon data from the 2020 decennial census, therefore the Client desires to include a current Residential Capacity Analysis ("2022 Capacity Analysis") using the most current data available (i.e., 2022 Estimates by Bureau of Economic and Business Research, BEBR) with their amendment application(s) materials.

The 2022 Capacity Analysis consists of the following process:



PROJECTIONS

Martin County's overall population is expected to increase 3.4% over the next 5 years, 2022 through 2026; 6.5% over the next 10 years, 2022 through 2031; 9.3% over the next 15 years, 2022 through 2036. Comparatively, the major focus of this 2022 Residential Capacity Analysis, Unincorporated County, is projected to see total population increases of 3.4% over the next 5 years, 6.5% in the next 10 years, and 9.2% over the next 15 years, from an estimated population of 132,913 in 2022 to 145,139 in 2036.

Total population includes both the population residing within *Occupied Housing Units* or *Households* and the population residing in *Group Quarters*, as defined by the U.S. Census. The distinction between total population and the population residing in *Occupied Housing Units* or

Households is important in the context of estimating future housing unit demand—e.g., the portion of the population residing in *Group Quarters* do not require *Housing Units*; therefore, that portion of the population does not contribute to future housing unit demand.

For the County as a whole, population in *Occupied Housing Units* or *Households* is expected to increase 2.7% over the next 5 years, 2022 through 2026; 4.7% over the next 10 years, 2022 through 2031; and 8.0% over the next 15 years, 2022 through 2036. Comparatively, Unincorporated County is projected to see population in *Occupied Housing Units* or *Households* increase 3.2% over the next 5 years, 5.3% in the next 10 years, and 8.6% over the next 15 years, from an estimate of 132,695 in 2022 to 144,149 in 2036.

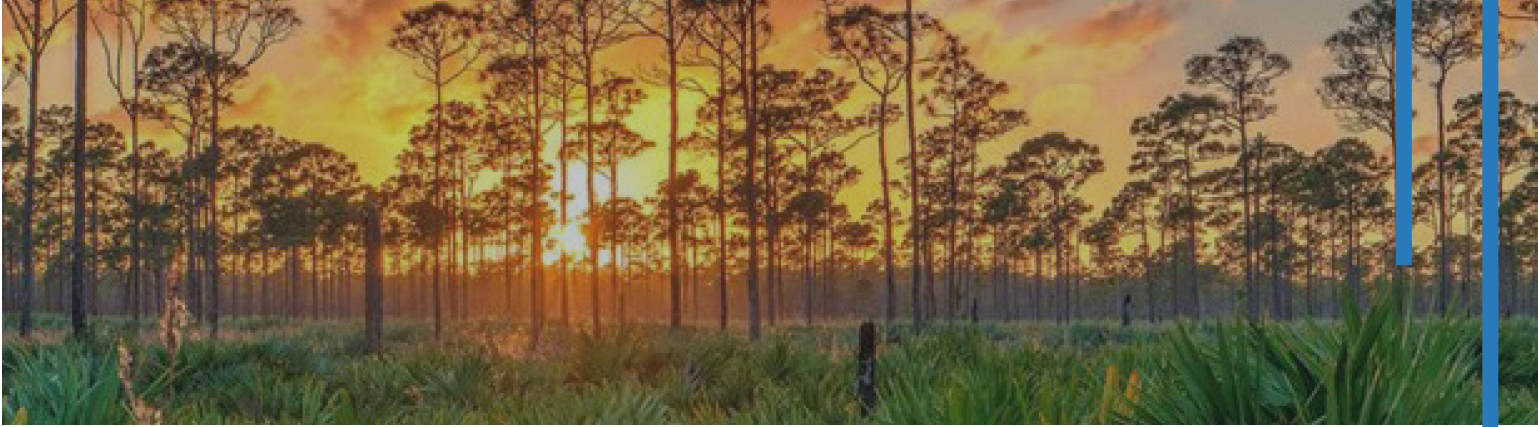


Image Source: Martin County, FL

HOUSING DEMAND

Relying upon population projections in *Occupied Housing Units* or *Households* and the 2010-2020 American Community Survey estimates of average household size, presented as average persons per household, for the County and the incorporated places within the County, projections of number of *Households* indicate that in 2022, the County, including all incorporated places within, contains an estimated 66,719 *Households*. The County’s overall *Households* are expected to increase 3.7% over the next 5 years, 2022 through 2026; 7.6% over the next 10 years, 2022 through 2031; and 13.7% over the next 15 years, 2022 through 2036. Comparatively, Unincorporated County is projected to see *Households* increase 4.4% over the next 5 years, 8.3% in the next 10 years, and 14.5% over the next 15 years, from an estimated 55,461 *Households* in 2022 to 63,486 in 2036.

While the *Households* projections described above estimates the number of *Housing Units* necessary to accommodate the projected population in *Occupied Housing Units* or *Households*, the calculation of total future housing unit demand must also account for the fact that some amount of *Housing Units* will always be in various states of vacancy condition, and some amount of *Housing Units* will be eliminated due to demolition or conversion to non-residential use(s). Taking into consideration various states of vacancy, the table below reflects the current and projected estimates for future housing unit demand within Unincorporated County in the 5-, 10- and 15-year planning periods beginning in 2022.

	Total Units	Cumulative Increase
2022	65,123	—
2026	68,534	3,411
2031	72,460	3,926
2036	76,604	4,144
Total Increase (2022 –2036)		11,481

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

RESIDENTIAL SUPPLY

The *Housing Units* needed, or future housing unit demand, over the 5-, 10-, and 15-year period must be compared to the residential supply (vacant land and vacant units) to determine if there is adequate residential capacity to accommodate future growth. Taking into account the ability of vacant land to accommodate residential development, the presence of wetlands, limitations of parcel configuration and ownership, and the fact that a portion of total vacant *Housing Units* must be retained in the market for operational purposes, the supply of *Housing Units* within the Unincorporated County, whether existing today in some state of vacancy or as potential *Housing Units* that could be built on vacant lands, totals 7,058 *Housing Units*.

MAJOR FINDINGS

The County does not currently have adequate supply in the 10- or 15-year planning periods to meet the increasing demand for housing within either of the defined Urban Service Districts. Thus, the Unincorporated County as a whole is lacking adequate supply to meet future housing unit demand. These results starkly contrast with those presented in the County’s 2018 and 2023 Residential Capacity Analyses, which concluded that the Unincorporated County has adequate housing supply to meet demand through 2030.

This 2022 Capacity Analysis illustrates there are at least 1,592 units that could currently be developed on vacant residential land located outside either of the USDs, to accommodate a portion of future housing unit demand. However, these potential units are not taken into consideration as supply in the calculation of residential capacity, because the vacant land is located outside of the USDs. Therefore, the County will need to either convert commercial lands to accommodate residential uses, increase residential densities within the USDs, or expand its USDs to address the growing residential demand.

PROJECT INTRODUCTION & BACKGROUND

INTRODUCTION

GAI Consultants' Community Solutions Group ("GAI" or "CSG") was retained by Kolter Land ("Client") to evaluate the capacity of residential lands focusing on the unincorporated portion of Martin County, Florida ("County") to accommodate future residential demand.

The Client has proposed a residential development called "Waterside" that is located on vacant land immediately adjacent to the Primary Urban Service District in unincorporated Martin County. The proposed Waterside PUD is directly behind the recently acquired Martin County Operations Center, which comprises approximately 30 acres, and the hugely successful South Florida Gateway PUD on approximately 200 acres. Both of these projects are located within a Free-Standing Industrial Urban Service District adjacent to SW Kanner Highway. At buildout, the South Florida Gateway PUD, which is currently under construction, will consist of approximately 3,000,000 SF of light industrial and limited retail uses, and the proposed Waterside PUD will consist of approximately 1,050 residential units on 375 acres.

Securing approval for the Project requires an amendment to the County's Comprehensive Growth Management Plan ("Comprehensive Plan"). Therefore, the Client is preparing support materials to accompany the necessary application(s) for submittal to the County for consideration.

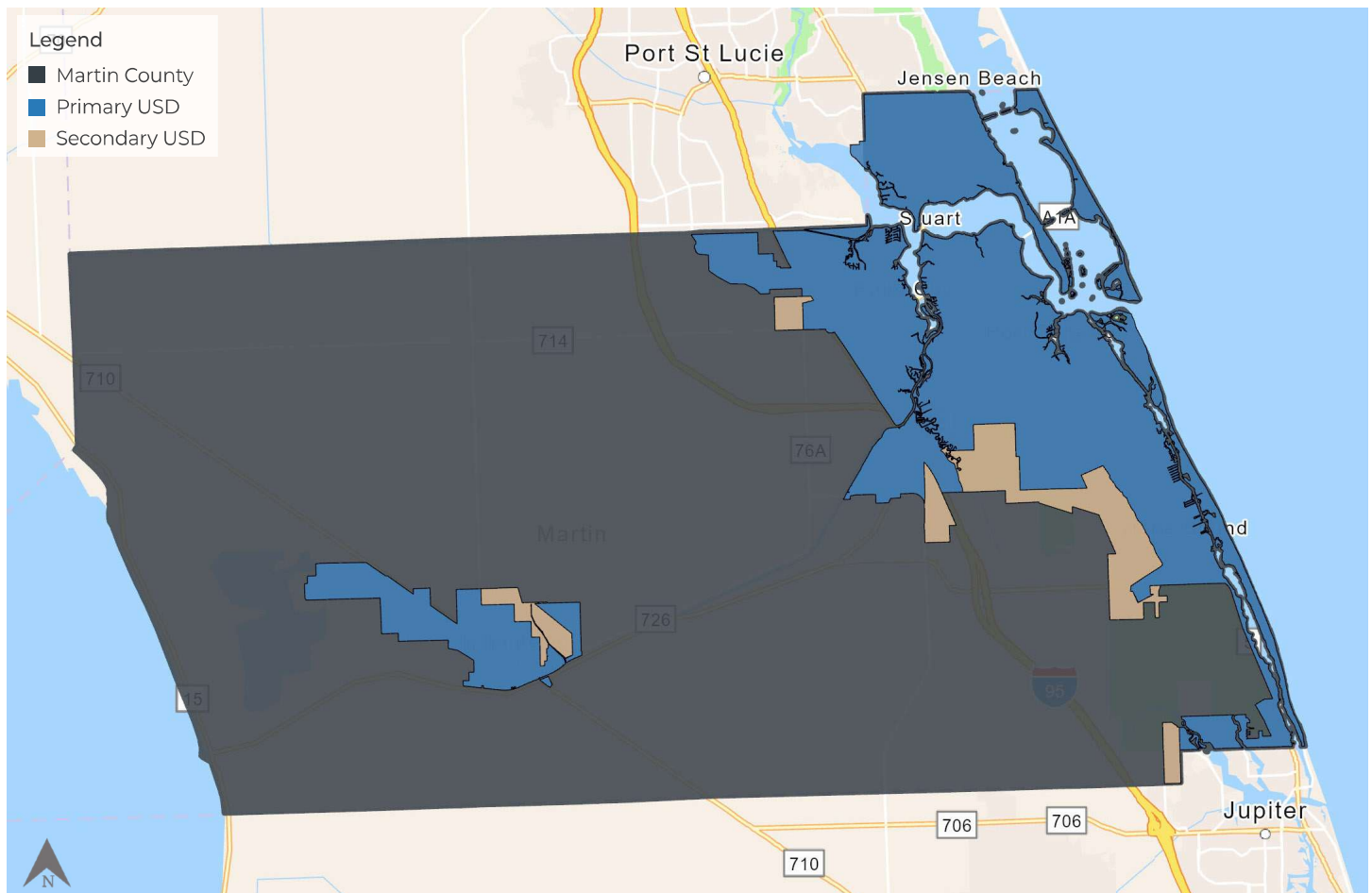
In 2023, the County produced a Residential Capacity Analysis ("2023 Residential Capacity Analysis") as an update to both the 2018 Residential Demand Analysis and 2018 Vacant Land and Residential Capacity Analysis ("2018 Residential Capacity Analysis"). The 2023 Residential Capacity Analysis relies upon data from the 2020 decennial census, therefore the Client desires to

include a current Residential Capacity Analysis ("2022 Capacity Analysis") using the most current data available (i.e., 2022 Estimate by Bureau of Economic and Business Research, BEBR) with their amendment application(s) materials.

Objective 4.1D of the County's Comprehensive Plan states "...County shall continue to collect and monitor development and population data to ensure sufficient land to address projected population needs". The 2022 Capacity Analysis is intended to determine whether sufficient residential capacity exists within the Urban Service Districts ("USDs") by comparing the residential *Housing Units* necessary in a specified projection period to the supply of vacant land and vacant *Housing Units*.

The County contains both a Primary Urban Service District ("PUSD") and a Secondary Urban Service District ("SUSD"). The PUSD consists of industrial, commercial, and higher-density residential development, while the SUSD consists of rural lands geographically located adjacent to the PUSD. The County's website states that the purpose of both the PUSD and the SUSD is to mitigate urban sprawl by directing growth in a timely and efficient manner to areas with urban public facilities and services, with these facilities and services programmed to be available at adopted levels of service. The purpose of the SUSD, specifically, is to accommodate lower-density rural and suburban residential development at the perimeter of urban development. The map on the following page illustrates the PUSD and the SUSD within Martin County (see **Figure 1**).

Figure 1. Urban Service District Map



LIMITATIONS

In conducting this 2022 Capacity Analysis, CSG first evaluated the 2018 Residential Capacity Analysis and its supporting documents including the 2017 Population Technical Bulletin (“2017 Bulletin”). The county subsequently released their 2023 Residential Capacity Analysis which has also been considered by CSG. *Policy 4.1D.2* of the County’s Comprehensive Plan stipulates “Martin County shall annually produce a population technical bulletin based on data provided by the Office of Economic and Demographic Research (“EDR”). CSG submitted a formal request to the County for the most recent annual population technical bulletin. The County responded by providing copies of Bureau of Economic and Business Research (“BEBR”) *Projections of Florida Population by County* for each of the years following 2017. However, the aforementioned BEBR publication does not contain the same data sources as the 2017 Bulletin produced by the County. More

specifically, the 2017 Bulletin produced by the County contained estimates and projections of population, *Housing Units*, and *Households* for the Unincorporated portion of the County; as well as planning area and municipalities within the County. Whereas, the BEBR publication provides only estimates and projections of population for the County. Per *Policy 4.1D.3* of the County’s Comprehensive Plan, “...demand for future residential *Housing Units* in the unincorporated area shall be based on the percentage increase in permanent population projected by the Population Technical Bulletin”. The 2017 Bulletin, and its required annual updates, are the foundation upon which the County’s process for calculating and projecting future housing unit demand relies.

As will be described in further detail throughout this 2022 Capacity Analysis and its accompanying appendices, fully replicating the specific procedures

of the County's Comprehensive Plan as presented in the 2023 Residential Capacity Analysis, 2018 Residential Capacity Analysis, and 2017 Bulletin is not possible due to dataset deficiencies and/or inconsistencies. For example, *Policy 4.1D.4* of the County's Comprehensive Plan states "...[the] percentage of residential housing demand that will be met outside the Urban Service Districts shall be based on the average number of certificates of occupancy for the preceding five years." CSG submitted a formal request to the County for

Certificates of Occupancy (2017–2021) by location (i.e., PUSD, SUSD, outside the USD). However, the County responded to the request stating, "County is not able to provide the information based upon on the requested districts and we have no records showing this information". Similar deficiencies and/or inconsistencies related to data sources were reconciled and/or replicated by CSG using alternative data sources, which are referenced and/or described within the relevant sections and/or appendices of this report.

RESIDENTIAL
CAPACITY ANALYSIS

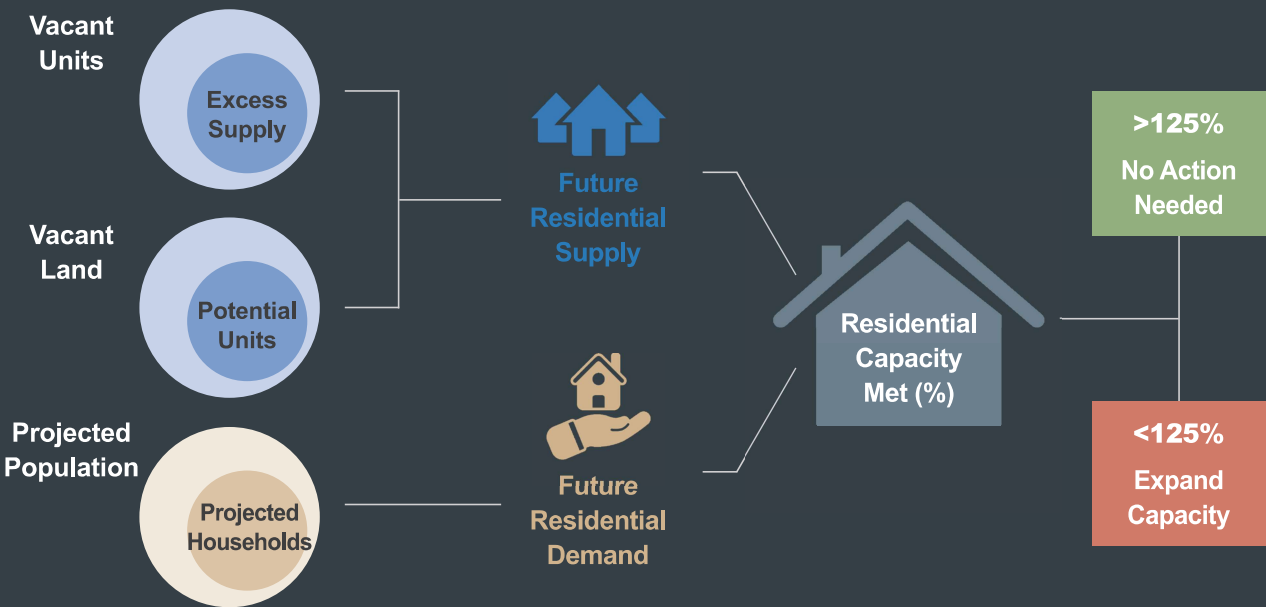
This 2022 Residential Capacity Analysis requires use of a variety of population, housing, employment, and parcel data. This data and the sources from which it was collected are contained within the Appendix. The process for the calculation of residential capacity for the purposes of this 2022 Capacity Analysis is substantively different from that followed by the County for their 2018 and 2023 Residential Capacity Analyses.

Some of these differences stem from policy changes that render certain calculations

no longer relevant, while other differences arise from the data deficiencies and/or inconsistencies. These differences, as they arise or become material to the approach or conclusions, are described in greater detail throughout this report and/or its accompanying appendices.

The 2022 Capacity Analysis contains three parts: (1) population projections; (2) projection of *Housing Units* necessary to accommodate projected population; and (3) calculation of residential housing supply, as depicted in the figure below (see **Figure 2**).

Figure 2. Residential Capacity Process



SECTION ONE

POPULATION PROJECTIONS

HISTORIC POPULATION

In the absence of a more recent population technical bulletin than the 2017 Bulletin produced by the County, this 2022 Capacity Analysis replicated the 2017 Bulletin using available 2020–2022 datasets from consistently reported and statistically reliable sources (e.g., U.S. Census Bureau, American Community Survey, BEBR, ESRI), to the greatest extent possible given previously noted constraints. Detailed description(s) of the approach, methodology, and calculations utilized to produce the population projections prepared for this 2022 Capacity Analysis are provided in Appendix C for additional reference.

Total population in the County has grown at a Compound Annual Growth Rate (“CAGR”) of 0.70% since 2010, as illustrated in **Table 1** below. The largest share of the County’s total population is in Stuart and the Unincorporated County, which combined account for over 93% of the total population of the County in 2020 and nearly 50% in County-wide population growth from 2010 to 2020. While the County overall has experienced growth, population has slightly decreased in Indiantown and Jupiter Island, and has remained relatively stable in Sewall’s Point. Ocean Breeze, while small in the context of the broader County, has seen rapid growth in the past five years, at a CAGR of 16.9%.

Table 1. Historical Total Population, 2010–2021

	Martin County						
	Indiantown ⁽¹⁾	Jupiter Island	Ocean Breeze	Sewall’s Point	Stuart	Unincorporated	TOTAL
2010 ⁽²⁾	—	817	355	1,996	15,593	127,557	146,318
2011	—	504	392	1,882	15,644	128,311	146,733
2012	—	523	332	1,906	15,653	128,840	147,254
2013	—	816	301	2,013	15,814	129,133	148,077
2014	—	816	95	1,998	15,972	129,704	148,585
2015	—	810	95	2,000	16,110	131,047	150,062
2016	—	812	100	2,026	16,148	131,784	150,870
2017	—	809	134	2,044	16,183	133,852	153,022
2018	6,707	826	163	2,078	16,425	129,357	155,556
2019	6,728	829	303	2,090	16,504	132,144	158,598
2020 ⁽²⁾	6,560	804	301	1,991	17,425	131,350	158,431
2021	6,633	879	292	1,984	17,269	131,996	159,053
CAGR (2010-2021)	—	0.6%	(1.6%)	(0.1%)	0.9%	0.3%	0.7%

Source: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2011-2022; GAI Consultants. Note: (1) Indiantown was incorporated on December 31, 2017. (2) Reflects data from the Decennial Census.

While **Table 1** depicts total population, the total population includes both the population residing within *Occupied Housing Units* or *Households* and the population residing in *Group Quarters*, which the U.S. Census Bureau defines as places such as college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, workers' dormitories, and facilities for people experiencing homelessness.

The distinction between total population and the population residing in *Occupied Housing Units* or *Households* is important in the context of estimating future housing unit demand. The portion of the population residing in *Group Quarters* do not require *Housing Units*; therefore, that portion of the population does not contribute to future housing unit demand. **Table 2** below illustrates the historical population in *Occupied Housing Units* or *Households*.

Table 2. Historical Population in Occupied Housing Units or Household, 2010–2021

	Martin County						
	Indiantown ⁽¹⁾	Jupiter Island	Ocean Breeze	Sewall's Point	Stuart	Unincorporated	TOTAL
2010 ⁽²⁾	—	746	355	1,996	15,168	124,120	142,385
2011	—	437	353	1,743	14,982	124,844	142,358
2012	—	466	298	1,764	15,018	125,402	142,949
2013	—	482	271	1,726	15,120	126,738	144,337
2014	—	533	232	1,842	15,238	128,142	145,987
2015	—	524	217	1,905	15,726	129,693	148,065
2016	—	551	193	1,987	15,898	131,264	149,892
2017	5,195	543	211	1,922	15,882	128,005	151,758
2018	6,299	590	154	1,944	15,754	129,173	153,915
2019	6,415	549	176	1,940	15,833	129,955	154,867
2020	6,486	608	266	1,985	15,956	131,036	156,337
2021	6,520	643	308	1,941	17,138	131,779	158,329
CAGR (2010-2021)	—	(1.2%)	(1.2%)	(0.2%)	1.0%	0.5%	0.9%

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants. Note: (1) Indiantown was incorporated on December 31, 2017. (2) Reflects data from the Decennial Census.

POPULATION PROJECTIONS

The County's overall population is expected to increase 3.4% over the next 5 years, 2022 through 2026; 6.5% over the next 10 years, 2022 through 2031; and 9.3% over the next 15 years, 2022 through 2036, as illustrated in **Table 3** below.

Focusing on the County's two largest concentrations of population, Stuart and Unincorporated County, Stuart is projected to increase 2.2% over the next 5 years, 4.7% in the next 10 years, and 6.9% over the next 15 years, from an estimated population of 17,417 in 2022

to 18,617 in 2036. Comparatively, Unincorporated County is projected to increase 3.4% over the next 5 years, 6.5% in the next 10 years, and 9.2% over the next 15 years, from an estimated population of 132,913 in 2022 to 145,139 in 2036.



Table 3. Total Population Estimates and Projections, 2022–2036

	Martin County						
	Indiantown	Jupiter Island	Ocean Breeze	Sewall's Point	Stuart	Unincorporated	TOTAL
2022 ⁽¹⁾	6,679	884	287	1,983	17,417	132,913	160,163
2023	6,758	898	282	2,032	17,397	133,808	161,176
2024	6,833	943	285	2,057	17,533	135,073	162,725
2025	6,910	988	288	2,082	17,671	136,351	164,290
2026	6,977	1,028	291	2,104	17,792	137,476	165,668
2027	7,034	1,062	294	2,123	17,896	138,438	166,847
2028	7,085	1,091	296	2,140	17,987	139,282	167,881
2029	7,130	1,119	298	2,155	18,070	140,053	168,825
2030	7,175	1,145	300	2,170	18,149	140,793	169,731
2031	7,219	1,171	302	2,184	18,230	141,538	170,644
2032	7,264	1,197	304	2,199	18,310	142,287	171,561
2033	7,308	1,223	306	2,214	18,390	143,026	172,467
2034	7,351	1,249	308	2,228	18,468	143,755	173,359
2035	7,393	1,274	310	2,242	18,544	144,462	174,226
2036	7,434	1,298	311	2,255	18,617	145,139	175,055
CAGR (2022–2036)	0.7%	2.6%	0.5%	0.9%	0.5%	0.6%	0.6%

Source: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2022–2036; GAI Consultants. Note: (1) 2022 reflects estimates.

Relying upon counts of total *Households* and average household size as reported by the U.S. Census Bureau for the County and each incorporated place therein, projections for the population in *Occupied Housing Units* or *Households* rely on a calculation of average historical capture of household population as a percent of total population, which is then applied against projections of total population for the County and each incorporated place therein. These projections are displayed in **Table 4** on the following page.

For reference, per the most current household population data provided by the U.S. Census Bureau for the County as a whole, population in *Occupied Housing Units* or *Households* is

expected to increase 2.7% over the next 5 years, 2022 through 2026; 4.7% over the next 10 years, 2022 through 2031; and 8.0% over the next 15 years, 2022 through 2036, as illustrated in the following table.

Focusing on the County's two largest concentrations of population, Stuart and Unincorporated County, Stuart is projected to increase 0.3% over the next 5 years, 2.2% in the next 10 years, and 4.9% over the next 15 years, from an estimate of 17,252 in 2022 to 18,093 in 2036. Comparatively, Unincorporated County is projected to increase 3.2% over the next 5 years, 5.3% in the next 10 years, and 8.6% over the next 15 years, from an estimate of 132,695 in 2022 to 144,149 in 2036.

Table 4. Population in Occupied Housing Units or Households Estimates and Projections, 2022–2036

	Martin County						
	Indiantown	Jupiter Island	Ocean Breeze	Sewall's Point	Stuart	Unincorporated	TOTAL
2022 ⁽¹⁾	6,580	661	292	1,976	17,252	132,695	159,457
2023	6,419	602	275	2,027	16,834	133,177	159,334
2024	6,480	607	277	2,046	16,996	134,460	160,866
2025	6,543	613	280	2,066	17,159	135,752	162,413
2026	6,598	618	282	2,083	17,303	136,891	163,775
2027	6,575	616	281	2,076	17,244	137,390	164,183
2028	6,616	620	283	2,089	17,351	138,241	165,201
2029	6,653	624	285	2,101	17,449	139,018	166,130
2030	6,689	627	286	2,112	17,542	139,764	167,021
2031	6,725	630	288	2,124	17,637	140,516	167,919
2032	6,761	634	289	2,135	17,732	141,271	168,822
2033	6,797	637	291	2,146	17,825	142,017	169,713
2034	6,832	640	292	2,157	17,917	142,752	170,591
2035	6,866	644	294	2,168	18,007	143,466	171,444
2036	6,899	647	295	2,178	18,093	144,149	172,260
CAGR (2022–2036)	0.3%	(0.2%)	0.1%	0.7%	0.3%	0.6%	0.5%

Source: U.S. Census, American Community Survey 2010-2021; BEBR; GAI Consultants. Note: (1) 2022 reflects estimates.

SECTION TWO HOUSING DEMAND

TERMINOLOGY

It is important to note the significance of terminology when discussing the topic of Housing. For example, terms such as *Housing Unit* and *Household*, are often mistakenly used interchangeably, which can result in the misuse or misrepresentation of data related to discretely different variables. In its most basic interpretation, a *Household* is simply an *Occupied Housing Unit*. Definitions procured from the U.S. Census Bureau and used for its reporting and tabulations are provided below for clarification of terminology used consistently throughout this analysis.

Housing Unit – A housing unit is a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied or intended for occupancy as separate living quarters.

Occupied Housing Unit – A housing unit is occupied if a person or group of persons is living in it at the time of the interview or if the occupants are only temporarily absent, as for example, on vacation. The persons living in the unit must consider it their usual place of residence or have no usual place of residence elsewhere. The count of Occupied Housing Units is the same as the count of Households.

Vacant Housing Unit – A housing unit is vacant if no one is living in it at the time... unless its occupants are only temporarily absent. In addition, a vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere.

Vacant Units for Rent – This group contains vacant units offered for rent and those [which may also be] offered both for rent and sale.

Vacant Units for Sale Only – This group is limited to units for sale only; it excludes units both for rent and sale. If a unit was located in a multi-unit structure which was for sale as an entire structure and if the unit was not for rent, it was reported as “held off market.” However, if the individual unit was intended to be occupied by the new owner, it was reported as “for sale.”

Vacant Units Rented or Sold – This group consists of...vacant units which have been rented or sold but the new renters or owners have not moved in...

Vacant Units held off the Market – Included in this category are units held for occasional use, temporarily occupied by persons with usual residence elsewhere, and vacant for other reasons.

Seasonal Vacant Units – Seasonal Housing Units are those intended for occupancy only during certain seasons of the year and are found primarily in resort areas. Housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as seasonal.

Household – The related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit.

Group Quarters – A Group Quarters (“GQ”) is a place where people live or stay in a group living arrangement that is owned or managed by an entity or organization providing housing and/or services for the residents. These services may include custodial or medical care, as well as other types of assistance, and residency is commonly restricted to those receiving these services. This is not a typical household-type living arrangement. People living in GQs usually are not related to each other. GQs include such places as college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, workers’ dormitories, and facilities for people experiencing homelessness.

The County’s 2018 Residential Capacity Analysis created its own unique variables by aggregating data topics reported by the U.S. Census Bureau,

definitions of these unique variables are provided below. However, some of the variables created by the 2018 Residential Capacity Analysis misrepresent Census reported data, and when these newly created unique variables are fed into the formulas established by *Policy 4.1D.3* of the County’s Comprehensive Plan, the data is treated improperly resulting in flawed methodology.

One notable example is related to the calculation of *Seasonal Population* (see definition from 2023 Demand Analysis below). The calculation for *Seasonal Population* essentially multiplies *Vacant Seasonal Housing Units* (see definition from 2023 Demand Analysis below) by average persons per household. The issue with this is twofold: (1) The definition of *Vacant Seasonal Housing Units* misrepresents the data sourced from the U.S. Census Bureau, as it dissects specific categories of Census-reported *Vacant Housing Units* out of the calculation but fails to acknowledge categories of Census-reported *Vacant Housing Units* which are universally reported jointly or added into the calculation such as “seasonal, recreational, or occasional use” and “other vacant”; and (2) Applying average persons per household, which is a characteristic of *Households* not *Housing Units*, as a characteristic of *Vacant Seasonal Housing Units* mischaracterizes these unrelated data topics.

Housing Units in Actual Use – The number of residential *Housing Units* occupied by permanent residents as classified by the U.S. Census, plus the number of *Vacant Seasonal Housing Units*. *Housing units in actual use* equals the *Occupied Housing Units* plus *Vacant Seasonal Housing Units*.

Seasonal Population – The number of residents living in residential *Housing Units* who spend less than six months in Martin County. The seasonal population in terms of the demand for residential *Housing Units* is calculated by multiplying the persons per *Household*, *Unincorporated Area*, by the “*Vacant Seasonal Housing Units*” as classified by the U.S. Census and defined in this chapter.

Vacant Seasonal Housing Units – The decennial Census count for residential *Housing Units* that are occupied, but for less than six months of the year. This definition excludes the following vacant categories used by the U.S. Census: *For rent*; *Rented, not occupied*; *For sale only*; *Sold, not occupied*; and *For migrant workers*.

2018 RESIDENTIAL DEMAND ANALYSIS OBSERVATIONS

Policy 4.1D.3 of the County's Comprehensive Plan stipulates the process for calculation of future residential housing unit demand. In short, it states that *Housing Unit* demand projections be based on the percentage of increase in permanent population projected by the population technical bulletin.

As previously noted, in the absence of a more recent population technical bulletin than the 2017 Bulletin, this 2022 Capacity Analysis replicated the 2017 Bulletin to the greatest extent possible, given previously noted constraints and using available 2020–2022 datasets from reliable sources (e.g., U.S. Census Bureau, American Community Survey, BEBR, ESRI) that can be found in Appendix C. However, establishing a multiplier by relying upon percent change in population and applying that multiplier against *Housing Units in Actual Use* to estimate future residential *Housing Unit* demand is another example of the misuse of data characteristics which are otherwise unrelated.

To demonstrate this point further, **Table 5** below presents measures of change using Census-reported data sets, including total population, total *Housing Units*, population in *Occupied Housing Units*, and *Occupied Housing Units* in Unincorporated Martin County over the 10-year period from 2010–2020.

Table 5. Census-Reported Measures of Change

	2010	2020	Change (2010- 2020)
Total Population			
Unincorporated	127,557	131,350	1.03
County Total	146,318	158,431	1.08
Total Housing Units			
Unincorporated	64,346	67,572	1.05
County Total	78,131	81,371	1.04
Population in Occupied Housing Units (Households)			
Unincorporated	124,120	131,036	1.06
County Total	142,385	156,337	1.10
Occupied Housing Units (Households)			
Unincorporated	49,346	54,268	1.10
County Total	59,203	64,870	1.10

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

The result was percent change multipliers ranging from 1.03 to 1.10 across the various measures of change for Unincorporated County. This variation in rates itself confirms that applying a population change-based multiplier to estimate future housing unit demand is a flawed methodology. The method used in the 2018 and 2023 Residential Capacity Analyses compounds errors. It would be incorrect to provide these kinds of measures against future years. Given the intent of the prior method, an alternative means to project future housing unit demand was created for this 2022 Capacity Analysis.

HOUSING UNIT DEMAND

Consistent with the County's Comprehensive Plan, the process described below estimates the *Housing Units* needed in the 10- and 15-year projection periods to determine whether future housing unit demand can be satisfied by the supply of vacant land and/or vacant *Housing Units*—ultimately concluding whether there is sufficient residential capacity within the USDs through 2036.

Relying upon the projection of population in *Households* contained in **Table 2** from the prior section and the 2010–2020 American Community Survey estimates of average household size, presented as average persons per household for the County and the incorporated places within the County, projections of number of *Households* can be calculated for the County and the incorporated places within the County.

In 2022, the County, including all incorporated places, was estimated to contain 66,719 *Households*. The County's overall *Households* are expected to increase 3.7% over the next 5 years, 2022 through 2026; 7.6% over the next 10 years, 2022 through 2031; and 13.7% over the next 15 years, 2022 through 2036, as illustrated in **Table 6** on the following page.

Focusing on the County's two largest concentrations of population, Stuart and Unincorporated County, *Households* in Stuart are projected to increase 0.6% over the next 5 years, 5.4% in the next 10 years, and 10.3% over the next 15 years. Comparatively, *Households* in Unincorporated County are projected to increase 4.4% over the next 5 years, 8.3% in the next 10 years, and 14.5% over the next 15 years.

Table 6. Household Estimates and Projections, 2022–2036

	Martin County						
	Indiantown	Jupiter Island	Ocean Breeze	Sewall's Point	Stuart	Unincorporated	TOTAL
2022 ⁽¹⁾	1,982	360	154	934	7,828	55,461	66,719
2023	1,926	348	138	926	7,662	56,334	67,335
2024	1,944	351	139	935	7,733	56,854	67,957
2025	1,962	355	140	943	7,805	57,380	68,584
2026	1,980	358	142	952	7,877	57,909	69,218
2027	1,998	361	143	961	7,949	58,444	69,857
2028	2,017	365	144	970	8,023	58,984	70,502
2029	2,035	368	146	979	8,097	59,529	71,153
2030	2,054	371	147	988	8,172	60,079	71,810
2031	2,073	375	148	997	8,247	60,633	72,474
2032	2,092	378	150	1,006	8,323	61,193	73,143
2033	2,112	382	151	1,015	8,400	61,759	73,818
2034	2,131	385	152	1,025	8,478	62,329	74,500
2035	2,151	389	154	1,034	8,556	62,905	75,188
2036	2,171	392	155	1,044	8,635	63,486	75,883
CAGR (2022–2036)	0.6%	0.6%	0.1%	0.7%	0.7%	0.9%	0.9%

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants. Note: (1) 2022 reflects estimates.

VACANCY CONSIDERATION

While the projection of *Households* illustrated above estimates the residential units necessary to accommodate the projected population in *Occupied Housing Units* or *Households* as depicted in **Table 4**, the calculation of total future housing unit demand must also account for the fact that some amount of *Housing Units* will always be in various states of vacancy condition, and some amount of *Housing Units* will be eliminated due to demolition or conversion to non-residential use(s). One specific set of vacancy conditions is *Housing Units* that are (1) rented but not occupied, (2) sold but not occupied, (3) for migrant workers, or (4) classified as “other vacant” units by the U.S. Census Bureau.

For the purposes of this 2022 Capacity Analysis, the sum of this specific set of vacancy conditions is referred to as “Rotational Vacancy”. Estimates for this value are based on Census data, which is presented in **Table 7**.

Table 7. Rotational Vacancy in Martin County

	Unincorporated	Total County
2010	3.4%	3.2%
2011	1.9%	1.6%
2012	1.9%	1.5%
2013	2.3%	1.9%
2014	3.1%	2.8%
2015	3.0%	2.7%
2016	4.0%	3.5%
2017	5.3%	5.0%
2018	6.2%	6.1%
2019	6.9%	7.0%
2020	7.9%	7.9%
2021	2.6%	1.8%
Average	3.8%	4.0%

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

One observation that should be noted, is that rotational vacancy gradually increased from 2015 to 2020 before declining to pre-2015 levels in 2021. As demonstrated in Appendix A, this was driven by an increase in *Other Vacant* housing units during this period. The U.S. Census Bureau defines *Other Vacant* as “year-round units which were vacant for reasons other than those mentioned above (i.e., for rent; for sale, only; rented, not occupied; sold, not occupied; and seasonal, recreational, and occasional use). For example, held for settlement of an estate, held for personal reasons, or held for repairs.”

Other examples of *Other Vacant Housing Units* include units that are vacant due to foreclosures, personal or family reasons, legal proceedings, being prepared for rent or sale, being held for storage of household furniture, needing repairs, currently being repaired and/or renovated, specific use housing (e.g., military housing, employee/ corporate housing, student housing, etc.), extended absence, abandoned or possibly to be demolished or condemned, or other unknown reasons. Thus, there are a wide variety of potential causes for the observed increase in *Other Vacant Housing Units*.

As discussed in Appendix A, national data from the Components of Inventory Change (CINCH) regarding housing unit losses due to demolitions and conversions to non-residential uses estimated that between 2009 and 2017, 0.33% of total *Housing Units* nationwide were lost due to demolitions, and 0.06% were lost due to conversions to non-residential uses. Thus, approximately 0.39% of the total housing stock is lost due to conversions or demolitions every 2 years, the equivalent of roughly 0.20% per year. The following reflects the projection estimates for the 10-year period of 2022–2031 and the 15-year period of 2022–2036:

- 5-Year Estimate of Percentage of Housing Unit Losses to Conversions/ Demolitions: **0.99%**
- 10-Year Estimate of Percentage of Housing Unit Losses to Conversions/ Demolitions: **1.98%**
- 15-Year Estimate of Percentage of Housing Unit Losses to Conversions/ Demolitions: **2.96%**

The percentage of all *Housing Units* in the County for seasonal, recreational, or occasional use (e.g., *Vacant units held off the market, Seasonal Vacant Units*) is illustrated in **Table 8** below.

Table 8. Seasonal Vacant Housing Units as a Percent of Total Housing Units

	Unincorporated	Total County
2010	9.8%	9.6%
2011	16.6%	16.8%
2012	17.1%	17.1%
2013	16.7%	17.0%
2014	15.5%	15.8%
2015	14.9%	15.1%
2016	13.2%	13.4%
2017	11.2%	11.7%
2018	10.7%	11.0%
2019	9.7%	9.9%
2020	9.1%	9.1%
2021	10.7%	10.6%
Average	12.9%	13.1%

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

As previously mentioned, some amount of *Housing Units* will always be in various states of vacancy condition, and some amount of housing units will be eliminated due to demolition or conversion to non-residential use(s). **Table 9** depicts how these conditions are applied to projected *Households* for 2026, 2031, and 2036 to project future housing unit demand.

Table 9. Unincorporated County Projected Housing Unit Demand (5-, 10-, and 15-Year)

	2026	2031	2036
Household Demand	57,909	60,633	63,486
Rotational Vacancy	60,084	62,910	65,870
Conversion/ Demolition	60,677	64,153	67,822
Seasonal Vacant Units	68,534	72,460	76,604

Source: U.S. Census, American Community Survey 2010-2021; CINCH; GAI Consultants.

Table 10 below reflects the projected estimates for housing unit demand in 2026, 2031, and 2036.

Table 10. Unincorporated County Projected Housing Unit Demand Increase (5-, 10-, and 15-Year)

	Total Units	Cumulative Increase
2022	65,123	—
2026	68,534	3,411
2031	72,460	3,926
2036	76,604	4,144
Total Increase (2022–2036)		11,481

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

DISTRIBUTION OF HOUSING UNIT DEMAND

Policy 4.1D.4 of the County’s Comprehensive Plan states, “The percentage of residential housing demand that will be met outside the Urban Service Districts shall be based on the average number of Certificates of Occupancy for the preceding five years. The number of Certificates of Occupancy outside the Urban Service Districts shall be divided by the total number of Certificates of Occupancy for the unincorporated area to determine the appropriate percentage. The remainder of residential housing demand must be met within the Primary and Secondary Urban Service Districts.”

In the absence of Certificate of Occupancy (“CO”) data, this 2022 Capacity Analysis relies upon the number of units built per year within the PUSD and SUSD within the Unincorporated County, as illustrated in **Table 11**. These figures closely resemble the percentages used by the County in their 2018 Residential Capacity Analysis, which are shown in Appendix A for reference. The data from **Table 11** will be relied upon to disaggregate projected *Housing Unit* demand across the USDs.

Table 11. Units Built Per Year by Urban Service Boundary, 2010–2021

	PUSD	SUSD	Outside USD	TOTAL
2010	179	4	5	188
2011	170	1	9	180
2012	268	0	10	278
2013	307	3	9	319
2014	310	8	7	325
2015	379	26	13	418
2016	357	21	15	393
2017	212	33	14	259
2018	251	20	23	294
2019	337	48	29	414
2020	88	3	2	93
2021	7	0	2	9
12-Year Total	2,865	167	138	3,170
% Capture	90.4%	5.3%	4.3%	100.0%

Source: Martin County Final 2022 Tax Roll; GAI Consultants.

Using the data from the table above, the projected *Housing Unit* demand across both the Primary USD and Secondary USD is disaggregated and distributed across the respective geographic areas as shown in **Table 12** below.

Table 12. Allocation of Unit Demand by Location, 2026–2031

	Capture % ⁽¹⁾	2026	2031	2036
PUSD	90.4%	3,083	3,548	3,746
SUSD	5.3%	180	207	218
Total USD	95.7%	3,262	3,755	
Outside USD	4.3%	148	171	180
TOTAL	100.0%	3,411	3,926	4,144

Source: Martin County Final 2022 Tax Roll; GAI Consultants. Note: ⁽¹⁾ Represents for the % Capture of Units Built Per Year by Urban Service Boundary shown in Table 11.

The projected *Housing Unit* demand can now be compared to the estimated supply of units in the Primary and Secondary USDs to determine residential capacity over the 5-, 10-, and 15-year planning periods.

SECTION THREE

RESIDENTIAL

SUPPLY

METHODOLOGY

The *Housing Units* needed, or future housing unit demand, over the 5-, 10-, and 15-year periods must be compared to the residential supply (vacant land and vacant units) to determine if there is adequate residential capacity in the USDs to accommodate future growth. The process for determining the supply of land and units is found in *Policy 4.1D.5* of the County's Comprehensive Plan.

According to *Policy 4.1D.5* of the County's Comprehensive Plan, residential supply consists of:

(1) Vacant property that allows residential use according to the Future Land Use Map. The maximum allowable density shall be used in calculating the number of available units on vacant acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be one-half the density of a given future land use designation.

(2) Subdivided single family and duplex lots. The following lot types shall be included in the residential capacity calculation:

a. Vacant single family or duplex lots of record as of 1982 developed prior to the County's tracking of development approvals.

b. Vacant single family or duplex lots of record platted after 1982.

(3) Potential for residential development in Mixed Use Overlays.

(4) Excess vacant housing not in use by permanent or seasonal residents. Excess vacant Housing Units is a vacancy rate higher than 3% of the number of Housing Units in actual use.

The County's procedures for exploring future residential capacity acknowledge that wetlands must be treated differently than other vacant lands for the purposes of calculating residential supply. However, the treatment of wetlands in the calculation of residential supply as stated in Section 4.3 of the County's Comprehensive Plan "for the purpose of this calculation, the maximum allowable density for wetlands shall be one-half the density of a given future land use designation" is contradictory to the County's Comprehensive Plan Policy 9.1G.1.C, which states "All wetlands in Martin County shall be protected. Negative impacts shall not be allowed in wetlands or within the buffer surrounding the wetland. All development shall be consistent with the wetland protection requirements of the CGMP and Florida Statutes. Inconsistent and/or incompatible future land uses shall be directed away from wetland areas." Additionally, Section 4.2.F of the County's Comprehensive Plan addresses rights of property owners to transfer density to upland areas on any site which contains wetlands, and states that "resulting

residential density of the upland property shall be no greater than 15 dwelling units per acre". The capacity of such wetlands to accommodate future activity materiality overstate their potential, ignoring the ownership, accessibility, size, upland character, scale, quality, locational, and mitigation obstacles or issues associated with intrusion into wetlands, or development activity adjacent to wetlands. Given recent hurricane, flood and insurance concerns, some wetland areas may be totally removed from any practical considerations of deployment or development.

This 2022 Capacity Analysis addresses the inconsistent and contradictory treatment of wetlands noted in the above sections of the County's Comprehensive Plan by identifying all parcels which are more than 50% inundated by wetlands but only calculating the maximum allowable density for the given future land use designation for the non-wetland portion of the parcel. While this 2022 Capacity Analysis respects the one-half, or 50%,

density yield for properties containing less than 50% wetlands, the factors mentioned would likely be major barriers to achieving a fraction of this potential. The above-described treatment of wetlands is reflected in the calculation of Net Density. The discussion on wetland areas addresses the challenges of including certain parcels for areas of future development, basic ownership positions, business interests, size, and general character of parcels will constrain the deployment of much vacant land for development.

It is simply not practical for planning purposes—especially given Florida’s favorable tax treatment to certain vacant lands—to assume all parcels and holdings are equally available or suitable to accommodate future housing demand opportunities. Some will remain in family ownership as a matter of legacy, while some parcels or lots are simply inadequate or poorly configured to become residential sites. Further, some parcels are saddled with legal entanglements while others will be withheld from the market for varying reasons precluding their availability to satisfy residential demand in an imminent or serviceable time frame. Ultimately, although a vacant property may allow for residential use according to the Future Land Use Map, it may not physically meet the requirement of the County’s Land Development Regulations to accommodate the construction of housing.

Vacant lands or properties that are designated on the Future Land Use Map for residential use do not universally translate to supply in terms of potential units. They could be years away from practically or strategically being converted into residential production.

Further, lands classified as *Agricultural* by the Martin County Property Appraiser, while often perceived as vacant lands, are defined in the Florida Administrative Code (FAC), Rule 12D-5.001(2), “...as the pursuit of an agricultural activity for a reasonable profit or at least upon a reasonable expectation of meeting investment cost and realizing a reasonable profit.” Florida Statute (F.S.), Section 193.461(3), states “...only lands that are used primarily for bona fide agricultural purposes shall be classified agricultural. The term “bona fide agricultural purposes” means good faith commercial agricultural use of the land.” F.S., Section 193.461(3)(b)2, then explains “Offering

property for sale does not constitute a primary use of land and may not be the basis for denying an agricultural classification if the land continues to be used primarily for bona fide agricultural purposes...”. Finally, F.S., Section 193.461(4) states, “The property appraiser shall reclassify the following lands as nonagricultural: (a) Land diverted from an agricultural to a nonagricultural use (b) Land no longer being utilized for agricultural purposes.”

To these points, the project known as Newfield, (previously known as Pineland Prairie), has a Future Land Use Designation of Mixed-Use Village, and Planned Mixed-Use Village (“PMUV”) Zoning. When the Comprehensive Plan Amendment and Zoning for Newfield were approved in 2018, the changes it contemplated 4,200 residential dwelling units which Martin County Growth Management has been including in the calculation of residential capacity for the PUSD since Newfield’s approval in 2018. To-date, no units have been built on the Newfield lands, and no land development in preparation for residential construction has occurred. The Newfield land continues to be used for agriculture related activities which is evidenced by the various agriculture related Department of Revenue (“DOR”) and Property Use Codes, which classify the use of the property in the Martin County Tax Roll. According to the 2022 Martin County Tax Roll, all but 23.2 acres of the Newfield properties are in active agriculture related use. Those portions of the Newfield lands in active agriculture related use are practically and functionally something other than vacant land, and therefore should not be counted towards the supply of potential units within the PUSD.

In an effort to at least marginally address some of the issues identified above, this 2022 Capacity Analysis excluded all vacant properties that failed to meet the smallest minimum lot area requirement of any zoning district from this calculation of supply, consistent with their respective Future Land Use designation.

The following pages display the number of potential units in the County’s USDs for each Future Land Use category containing vacant lands that allow for residential use according to the County’s Comprehensive Plan (see **Tables 13–14** and **Figures 4–5**).

Figure 3. Wetlands and Parcels with 50%+ Wetlands

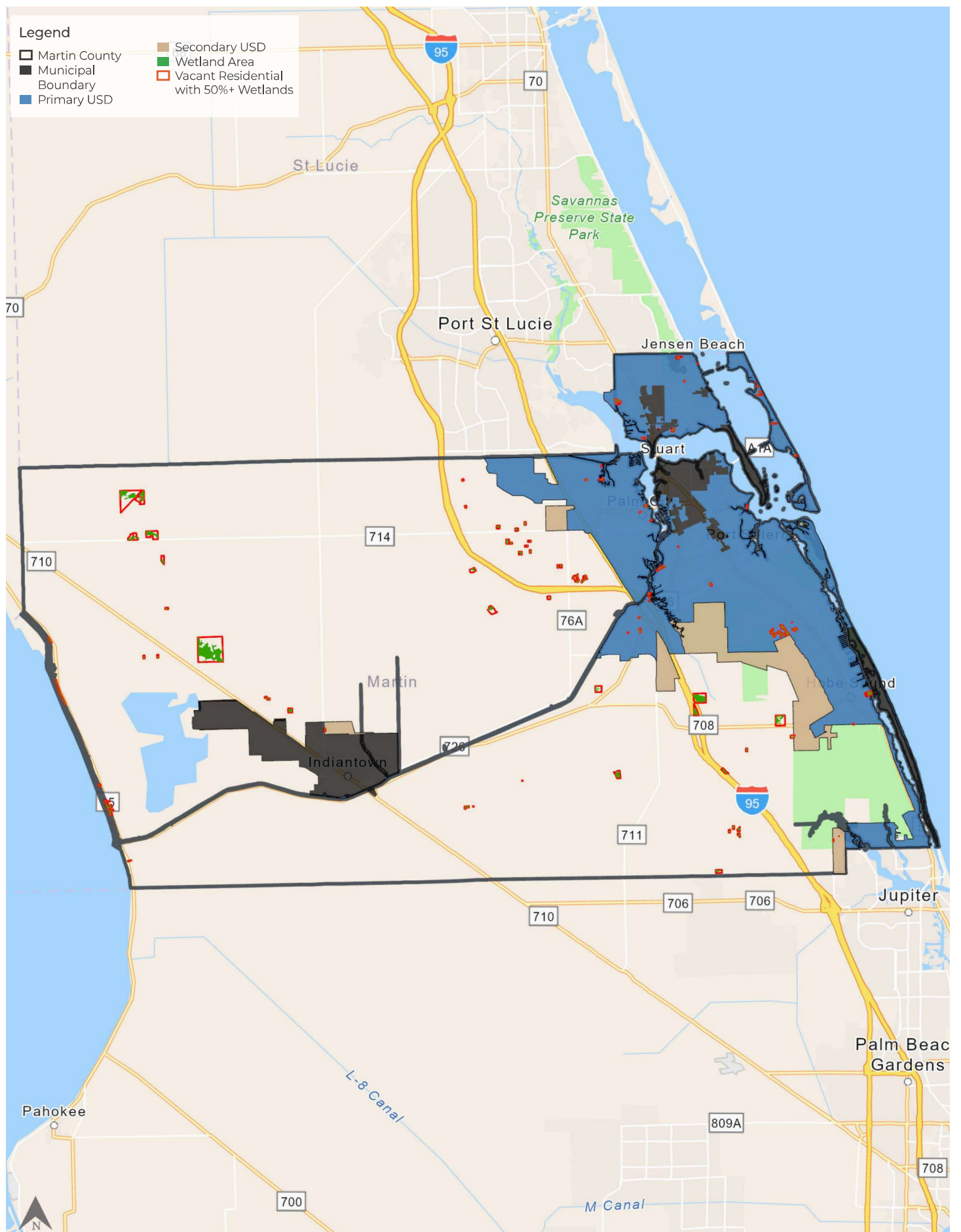


Table 13. Potential Units in Primary Urban Service District (PUSD)

Future Land Use	Maximum Allowable UPA ⁽¹⁾	Total Acres	Wetland Probable Acres	Total Acres less Wetlands	Gross Density	Net Density
Commercial/Office/Res.	10.0	48.0	0.0	47.9	479.5	479.4
Estate Density 1UPA	1.0	6.5	0.2	6.3	6.5	6.4
Estate Density 2UPA	2.0	250.7	81.9	168.8	501.4	348.7
Low Density	5.0	426.4	62.4	364.0	2,131.8	1,847.6
Medium Density	8.0	24.2	0.6	23.6	193.8	189.4
High Density	10.0	5.9	0.0	5.9	58.6	58.6
Mobile Home	8.0	10.9	0.1	10.9	87.3	87.1
Rural Density	0.5	104.1	21.3	82.8	52.0	45.4
Mixed-Use Village	32.0	23.2	7.4	15.9	743.4	625.5
CRA Neighborhood	10.0	143.9	13.4	130.5	1,439.1	1,315.8
TOTAL		1,043.7	187.3	856.4	5,693.4	5,003.9

Sources: Florida Department of Revenue (FDOR) Parcel Boundaries 2022; Martin County Property Appraiser 2022 Final Tax Roll; GAI Consultants. Note: Totals may not add due to rounding. (1) UPA represents Units per Acre. For the purposes of this 2022 Residential Capacity Analysis, vacant lands include all properties which meet the minimum lot size requirements stipulated by the County's Land Development Regulations, and are limited to the following DOR Use Codes: 0 (Vacant Res) and 63 (Grazing land soil capability class IV/Grazing land – non-productive).

Figure 4. Future Land Use, Primary USD

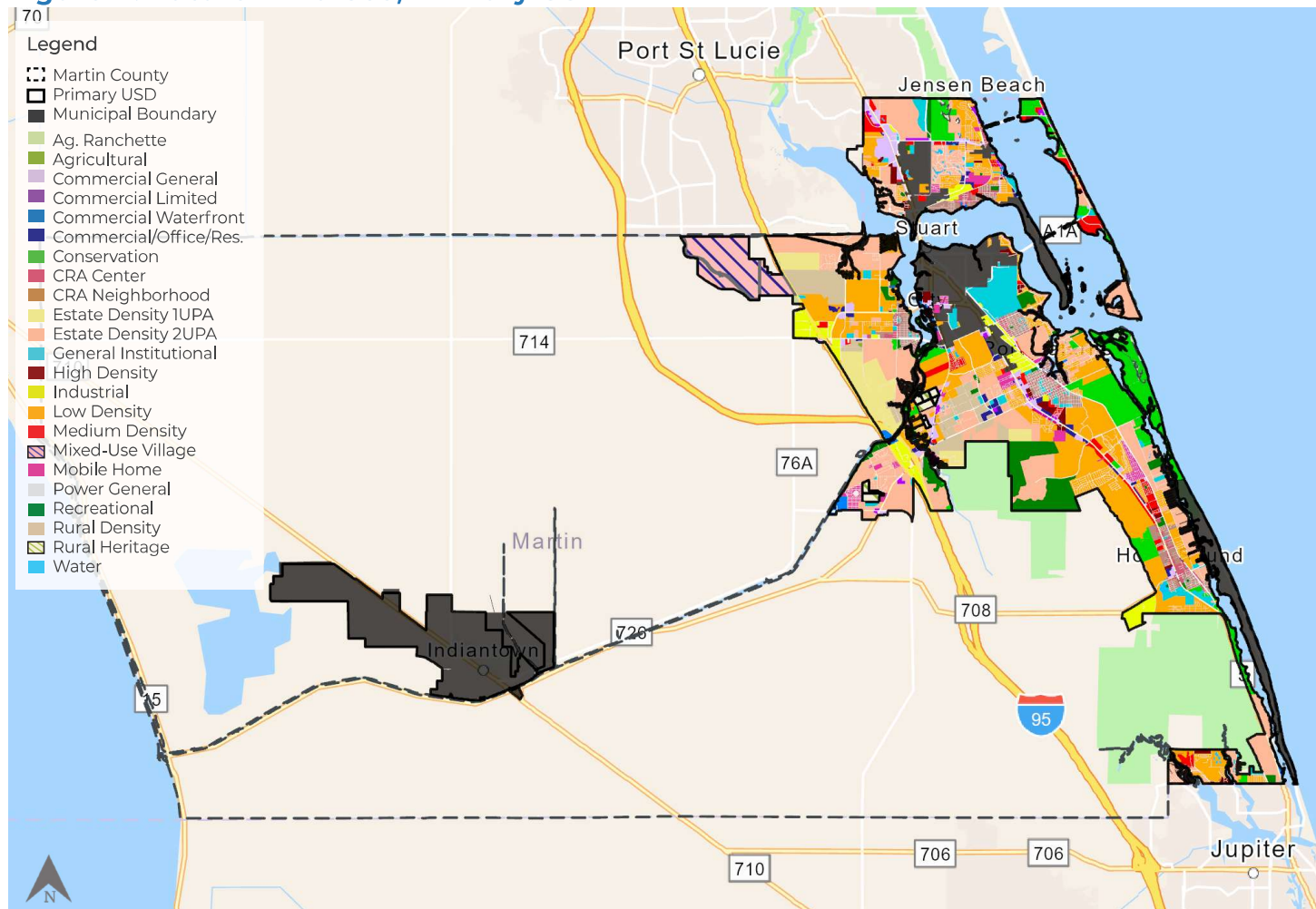
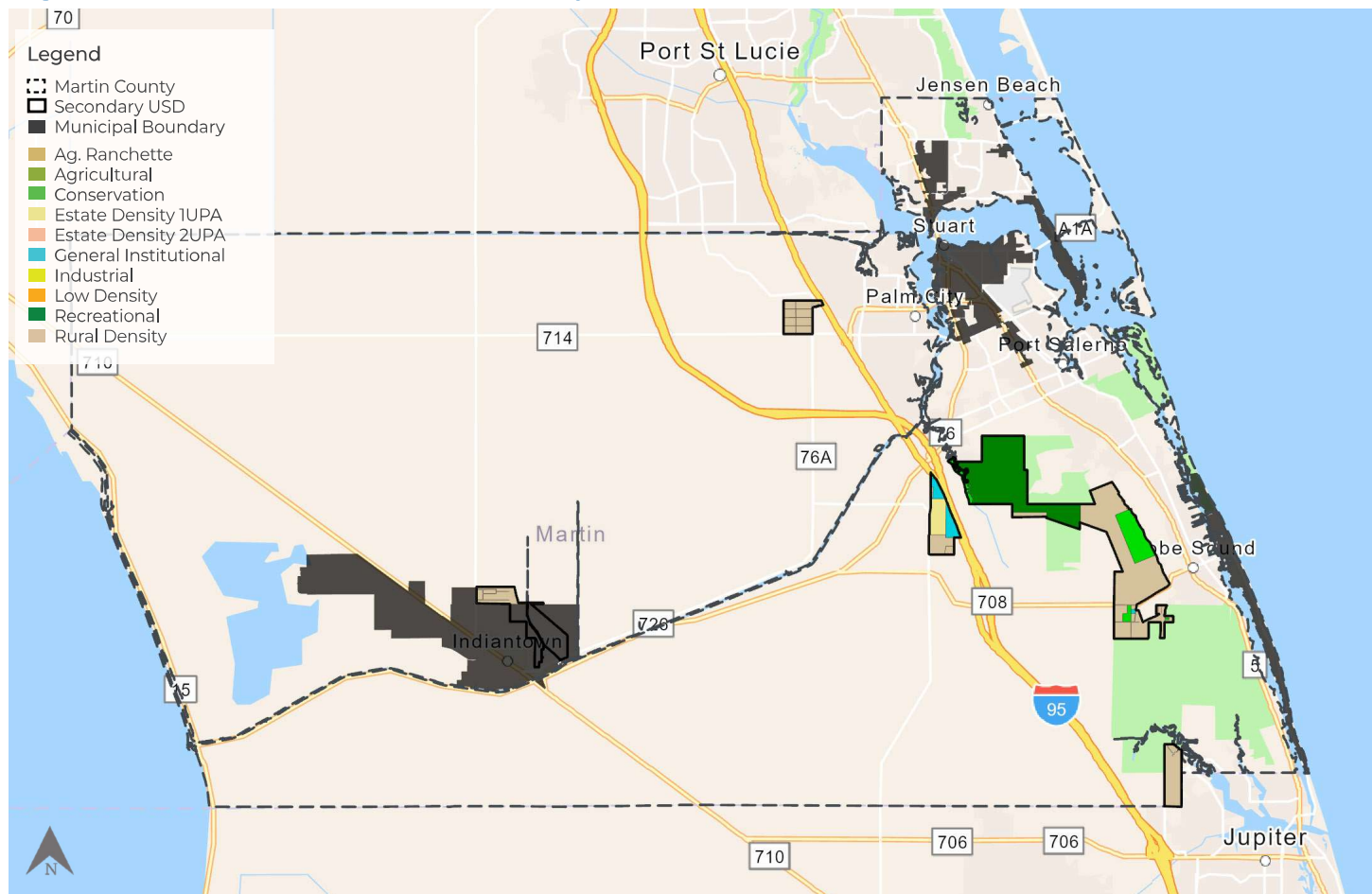


Table 14. Potential Units in Secondary Urban Service District (SUSD)

Future Land Use	Maximum Allowable UPA ⁽¹⁾	Total Acres	Wetland Probable Acres	Total Acres less Wetlands	Gross Density	Net Density
Rural Density	0.5	959.2	328.1	631.1	479.6	238.2
TOTAL		959.2	328.1	631.1	479.6	238.2

Sources: Florida Department of Revenue (FDOR) Parcel Boundaries 2022; Martin County Property Appraiser 2022 Final Tax Roll; GAI Consultants. Note: Totals may not add due to rounding. (1) UPA represents Units per Acre. For the purposes of this 2022 Residential Capacity Analysis, vacant lands include all properties which meet the minimum lot size requirements stipulated by the County's Land Development Regulations, and are limited to the following DOR Use Codes: 0 (Vacant Res) and 63 (Grazing land soil capability class IV/Grazing land – non-productive).

Figure 5. Future Land Use, Secondary USD



The County's Comprehensive Plan stipulates that residential supply include both current subdivided single family and duplex lots and those lots of record which were developed prior to 1982. However, given that vacant property allowing residential use according to the Future Land Use Map is already included in residential supply, the addition of subdivided single family or duplex lots of record would result in an over-counting of residential supply. Additionally, it is highly unlikely that single family or duplex lots of record developed prior to 1982 that have not had *Housing Units* built in the over 30 years since being developed will see new *Housing Unit(s)* built on them in the foreseeable future.

The County's 2018 Residential Capacity Analysis includes unbuilt multi-family units with approved final site plan in the calculation of residential supply. The County's 2023 Residential Capacity Analysis further includes all approved projects allowing residential development, based on the projected entitled units. Similar to single family and duplex lots of record, vacant property allowing residential use according to the Future Land Use Map is already included in residential supply; therefore, the addition of unbuilt multi-family units with approved final site plan, and/or approved projects allowing residential development would result in an over-counting of residential supply.

3 The County's 2023 Residential Capacity Analysis calculated potential for residential development in Mixed-Use overlays; however, the County's Land Development Regulations have since been amended, and Mixed-Use overlays are no longer referenced. Additionally, all parcels within Community Redevelopment Areas ("CRA"), where mixed-use overlays were prominent in the past, are located within the Unincorporated County and the PUSD; therefore, they do not require scrutiny beyond that afforded to all other vacant parcels and/or lands located within the PUSD. As reflected in Table 13, parcels and/or lands within a CRA are subject to specific Future Land Use Designations including but not limited to, CRA Center, CRA Neighborhood, and CRA Core. Additionally, each CRA is subject to its own unique set of Land Development Regulations which are best described as form-based code. Therefore, for the purposes of this 2022 Capacity Analysis, vacant lands and/or parcels within CRAs do not require specialized consideration or analysis from all other vacant parcels and/or lands within the PUSD.

4 While the County's Comprehensive Plan stipulates that excess vacant housing be included in the calculation of residential supply, it relies upon a vacancy rate of 3% to establish market turn-over conditions. Both the rate and the approach are an oversimplification of a complex means for estimating occupied units and residents. Some additional vacant units on the market are necessary to accommodate the mobility of the larger number of *Households* and choosing among options in the housing stock on a continuing basis. Estimating this increase in vacant units involves determining the natural vacancy rate. The natural vacancy tends to change over time and must be updated based on current vacancy trends.

This 2022 Capacity Analysis examined the vacancy conditions occurring from 2010–2021 and determined the percentage of excess vacant *Housing Units* that needs to be maintained for mobility of households and housing stock is 6.4%. The natural vacancy rate of 6.4% is a blended average largely driven by the ratio of vacant for-sale units to owner-occupied units and the ratios of vacant for-rent units to renter-occupied units. The excess vacant *Housing Units*

are calculated by subtracting rotational vacancy from the number of vacant *Housing Units* not in seasonal, recreational, or occasional use, with 6.4% of the difference deducted to account for the natural vacancy rate. Since housing unit vacancy can fluctuate each year, the number of units are averaged as illustrated in the following **Table 15**.

Table 15. Vacant Housing, Not in Seasonal Use and Rotational Vacancy, 2010–2021

	Vacant, not seasonal	Rotational Vacancy	Excess Vacant
2010	4,957	2,067	2,558
2011	4,049	1,046	2,764
2012	3,681	983	2,498
2013	3,619	1,252	2,195
2014	4,115	1,797	2,158
2015	3,804	1,776	1,899
2016	4,040	2,315	1,628
2017	5,166	3,285	1,750
2018	5,593	4,095	1,414
2019	6,215	4,816	1,340
2020	3,958	5,317	(1,304)
2021	5,090	1,198	3,746
Average Annual	4,524	2,496	1,898

Source: U.S. Census, American Community Survey 2010-2021; GAI Consultants.

In accordance with *Policy 4.1D.4* of the County's Comprehensive Plan, the 1,898 excess vacant units identified in **Table 15** are assigned to the Primary and Secondary USDs or outside the USDs based on the allocation of units built per year detailed in **Table 11**.

Calculating the percentages of the allocation of units built in the past 5 years from **Table 11**, the excess vacant housing is allocated into the Primary and Secondary USDs or outside the USDs, as illustrated in **Table 16** below.

Table 16. Allocation of Excess Vacant Housing Units by USD

	% Capture ⁽¹⁾	Excess Vacant Units
Primary USD	90.4%	1,716
Secondary USD	5.3%	100
Outside USD	4.3%	83
TOTAL	100.0%	1,898

Source: U.S. Census, American Community Survey 2010-2021; Martin County; GAI Consultants. Note: (1) Represents for the % Capture of Units Built Per Year by Urban Service Boundary shown in Table 11.

To summarize the components of the County’s Comprehensive Plan *Policy 4.1D.5, Table 17* estimates of the total *Housing Units* available to accommodate future housing unit demand.

Table 17. Summary of the Supply of Potential Units

	Primary USD Units	Secondary USD Units
Vacant Land	5,004	238
Excess Vacancies	1,716	100
TOTAL	6,720	338

Source: U.S. Census, American Community Survey 2010-2021; FDOR Parcel Boundaries 2022; Martin County; GAI Consultants.

RECONCILIATION OF RESIDENTIAL DEMAND WITH SUPPLY

Policy 4.1D.5 of the County’s Comprehensive Plan states:

The 15-year planning period for residential capacity began with the 2010 Census and shall be updated to a new 15-year planning period every 5 years. The residential capacity analysis showing the total residential supply within the Primary and the Secondary Urban Service Districts shall be compared to the projected residential demand as outlined in Policy 4.1D.3 and 4.1D.4...[and] shall show demand and supply comparisons for a ten-year period as well as for the 15-year planning period.

In accordance with *Policy 4.1D.5*, residential demand for a 5-, 10-, and 15-year planning periods are compared to the amount of land available to accommodate that demand. **Table 18** displays these comparisons.

Table 18. 2022–2036 Analysis of Supply versus Demand

	PUSD	SUSD	TOTAL
Existing Supply (2022)	6,720	338	7,058
5-Year Demand	3,083	180	3,262
% Capture	218%	188%	216%
10-Year Demand	6,631	387	7,017
% Capture	101%	88%	101%
15-Year Demand	10,376	605	10,981
% Capture	65%	56%	64%

Source: U.S. Census, American Community Survey 2010-2021; FDOR Parcel Boundaries 2022; Martin County; GAI Consultants.

Section 4.2.A(9) of the County’s Comprehensive Plan states:

When the undeveloped residential acreage within either the Primary Urban Service District or the Secondary Urban Service District no longer provides for projected population growth for the 15-year planning period, planning for expansion of residential capacity shall commence. When the undeveloped acreage within either the Primary Urban Service District or the Secondary Urban Service District provides for no more than 10 years of projected population growth, the County is required to expand capacity.

While the County’s Comprehensive Plan does not explicitly state a threshold for what constitutes “providing for projected population”, the procedure established in the County’s Comprehensive Plan for comparing supply and demand would suggest that if the percentage of future housing unit demand met by supply is *less than 125%* for either the 10- or 15-year planning periods, then the USDs no longer provide adequate residential acreage to accommodate projected population growth. As indicated from the data presented in **Table 18**, neither the PUSD nor the SUSD provide adequate vacant residential acreage to accommodate projected population growth in the 10- or 15-year planning periods.



SECTION FOUR

OTHER CONSIDERATIONS, OBSERVATIONS & CONCLUSIONS

The dynamics of population growth and change stem from the interaction of many complex variables and events. Only some of these are given detailed study in the present analysis, primarily because they are not a procedural requirement of the County's Comprehensive Plan. However, if these additional variables or some dimensions of them were addressed, they would further underscore the highly conservative nature of our calculations and ultimate conclusions. In effect a variety of other factors or influences suggest Martin County's future residential capacity is much more constrained than our estimates indicate. Several of the more pertinent issues or considerations are described below, providing additional context to the quantification of the County's future residential capacity needs.

EMPLOYMENT

While it is true that certain areas of Florida exhibit different patterns of change, it is a well-accepted axiom of regional dynamics that population growth is substantively driven by the inflow of capital and income stemming from job creation.

As employment grows in a particular area, there is movement to settle closer to that employment. Although the correlation is not a perfect one, increased employment induces housing development, then driving population growth, which itself induces secondary employment. What is seen in the current circumstances is a growing pattern of workers commuting into Martin County from nearby counties, evidencing the power of Martin County as an employment center. Physically connected in part by the road system, Martin County is also economically linked to its neighbors, which displays an obvious trend for its populations to work in Martin County.

As various documents and plans show, Martin County supports job growth, so this emphasis on economic expansion or intensification reinforces this trend and direction. The proposed Waterside PUD is directly behind the recently acquired Martin County Operations Center, which comprises approximately 30 acres, and the hugely successful South Florida Gateway PUD on approximately 200 acres. Both of these projects are located within a Free-Standing Industrial Urban Service District adjacent to SW Kanner Highway. At buildout, the South Florida Gateway PUD, which is currently under construction, will consist of approximately 3,000,000 SF of light industrial and limited retail uses. While this prospective employment activity is not itself pivotal to this 2022 Capacity Analysis, it supports the general patterns of growth and change that underlie future residential demand.

Table 19 on the following page displays total employment data sourced from the U.S. Census Bureau Longitudinal Employer-Household Dynamics ("LEHD"). Total employment in Martin County has grown at a CAGR of 3.5% between 2010 and 2019, with 2019 being the most recent year in which data is available. As with population, the largest concentrations of employment are in Stuart and Unincorporated Martin County, with Jupiter Island experiencing a slight decline in total employment over the same period. Comparatively, Ocean Breeze has seen significant growth in employment from 2010 to 2019, with a CAGR of 20.4%. Sewall's Point's employment has remained relatively constant since 2010, which similarly corresponds to the municipality's population trends.

Table 19. Historical Employment in Martin County, 2010–2019

	Martin County						
	Indiantown ⁽¹⁾	Jupiter Island	Ocean Breeze	Sewall's Point	Stuart	Unincorporated	TOTAL
2010	—	574	49	431	22,875	27,658	51,587
2011	—	548	120	437	24,705	29,729	55,539
2012	—	545	85	406	23,831	29,563	54,430
2013	—	550	91	377	23,697	30,467	55,182
2014	—	542	100	387	24,664	32,638	58,331
2015	—	617	144	390	26,445	34,536	62,132
2016	—	497	188	521	28,215	37,159	66,580
2017	—	520	168	512	28,338	36,290	66,749
2018	928	529	195	458	28,998	39,149	70,257
2019	907	521	313	459	29,160	41,202	72,562
CAGR (2010-2019)	—	(1.0%)	20.4%	0.6%	2.5%	4.1%	3.5%

Source: U.S. Census Bureau, LEHD OnTheMap Designation 2010-2019; GAI Consultants. Note: (1) Indiantown was incorporated on December 31, 2017.

Inflow/outflow data reveals that the share of people employed in the County but living elsewhere has increased at a CAGR of 4.5% between 2010 and 2019, with 65.1% of people employed in Martin County living outside the County itself as of 2019. The share of people living in Martin County but employed outside the County has grown at a CAGR of 1.7% since 2010. The number of people living and employed within the County has also increased at a CAGR of 1.8%; this is a notable since it is a higher rate of growth than people who live in the County but are employed outside of the County itself.

The inflow/outflow data also reveals trends regarding the relationship between employment, population growth, and housing supply. The number of people living within Martin County but employed outside of the County has not grown nearly as much as the number of people employed in the County but living elsewhere, which is an important consideration in the context of housing demand. Comparing Martin County's employment growth to that of its surrounding counties, Palm Beach County grew at a CAGR of 2.5% over the 10 years from 2010–2019. Similarly St. Lucie grew at a CAGR of 2.6%, while Okeechobee declined at a CAGR of 0.4 %. Martin County, with a CAGR of 3.5%, grew at the highest rate of all neighboring counties. Further discussion of employment trends can be found in Appendix D.

PACE OF RESIDENTIAL PRODUCTION

Martin County Growth Management has failed to consider or even acknowledge the pace of residential development within the County respective to the supply of vacant land approved for residential use. Regardless of the volume of vacant land approved for residential use within the USDs, to assume that the maximum permissible density will be achievable on those vacant lands and that the permissible units will be produced or delivered within the 10-year, or 15-year planning period(s) is inconsistent with historical data. Over the past 20 years, housing unit production has declined substantially both in Martin County as a whole, and specifically within Unincorporated Martin County. Countywide, housing unit production has exhibited a negative CAGR of 0.69% from 2002–2022, while Unincorporated Martin County has also seen a negative CAGR of 5.22% during the same period.

Examination of a number of Developments of Regional Impact (DRI) within Martin County illustrate this situation, specifically five (5) DRIs in Martin County revealed average annual production of just 53 residential units per year, representing an average of 34 years to complete land development and production of residential units. Further, only one (1) of the five (5) DRIs examined built all of the residential units which

their DRI permitted, with an average of just 69% of permitted residential units actually being produced. A detailed discussion of past residential production can be found in Appendix A.

ANNEXATION ACTIVITY

Aggressive patterns of annexation sponsored by Martin County’s incorporated areas might ease pressures on the County to urbanize in certain locations, mitigating the need for the County to add residential capacity. A generalized look at the data—especially in the context of population estimates for the unincorporated area—suggests the County’s municipalities have a relatively limited capacity for accommodating added growth within their jurisdictional boundaries so this will shift population in the County.

Much of the relatively recent annexation activity is occurring around the edges of the northern and southern boundary limits of the City of Stuart. Each of Stuart’s annexations are located within the PUSD. Indiantown’s only annexation consisted of 57.7 acres and was on the North end of their municipal boundary, bordering the PUSD.

Table 20 on the following page details all annexations that have occurred in Martin County’s incorporated places over the past 10 years. Maps depicting the location of annexations which have occurred in the past 10 years can be found in Appendix E.

Table 20 Annexations in Martin County

Municipality	Ordinance Number	Acres
Stuart	2327–2016	24.37
Stuart	2337–2017	29.16
Stuart	2345–2017	9.45
Stuart	2348–2017	14.86
Stuart	2352–2017	13.57
Stuart	2367–2018	1.87
Stuart	2376–2018	65.23
Stuart	2377–2018	65.79
Stuart	2378–2018	26.61
Stuart	2381–2018	0.80
Stuart	2415–2019	15.79
Stuart	2452–2021	42.46
Indiantown	04–2020	57.72

Source: Martin County Agenda Items database; Martin County Property Appraiser; GAI Consultants.

POPULATION ESTIMATES AND PROJECTIONS GENERALLY

Without debating the value and merit of BEBR’s forecasts as a planning tool, they are often misunderstood or misapplied to many issues. Despite the general application of the medium data set to support planning decisions, the actual numbers reflect a range of possible outcomes from low to high. This range is a statistical calculation of actual population—although it will have a strong probability of falling within that range, it could also fall below or above the range. In Florida, many counties have experienced significant growth above that higher statistical range because of external influences not adequately explained in the model.

To keep local projections in context, Florida has long been one of the states gaining the *most* population, but it is now also the *fastest* growing state. While it is certainly speculative to posit how this pace will impact Martin County’s own growth trajectory, it is not unreasonable for policy to recognize the limitations of the data in use. To that point in particular, it is also not unreasonable to anticipate change at, or above, the higher end of the range. To be clear, BEBR remains among the most credible and highly regarded sources of population information; however, its output as a legislative and administrative *ceiling* for growth is not without problems, especially absent an informed understanding of its real limitations.

CONCLUSIONS

The County does not currently have adequate supply in the 10- or 15-year planning periods to meet the increasing demand for housing within either the PUSD or the SUSD. Thus, the Unincorporated County as a whole is lacking adequate supply to meet future housing unit demand. These results starkly contrast with those presented in the County’s 2018 and 2023 Residential Capacity Analyses, which concluded that the Unincorporated County has adequate housing supply to meet demand through 2030.

This 2022 Capacity Analysis illustrates that there are at least 1,592 units that could currently be developed on vacant land, which allows for residential use according to the Future Land Use Map, located outside the USDs to accommodate a portion of future housing unit demand.

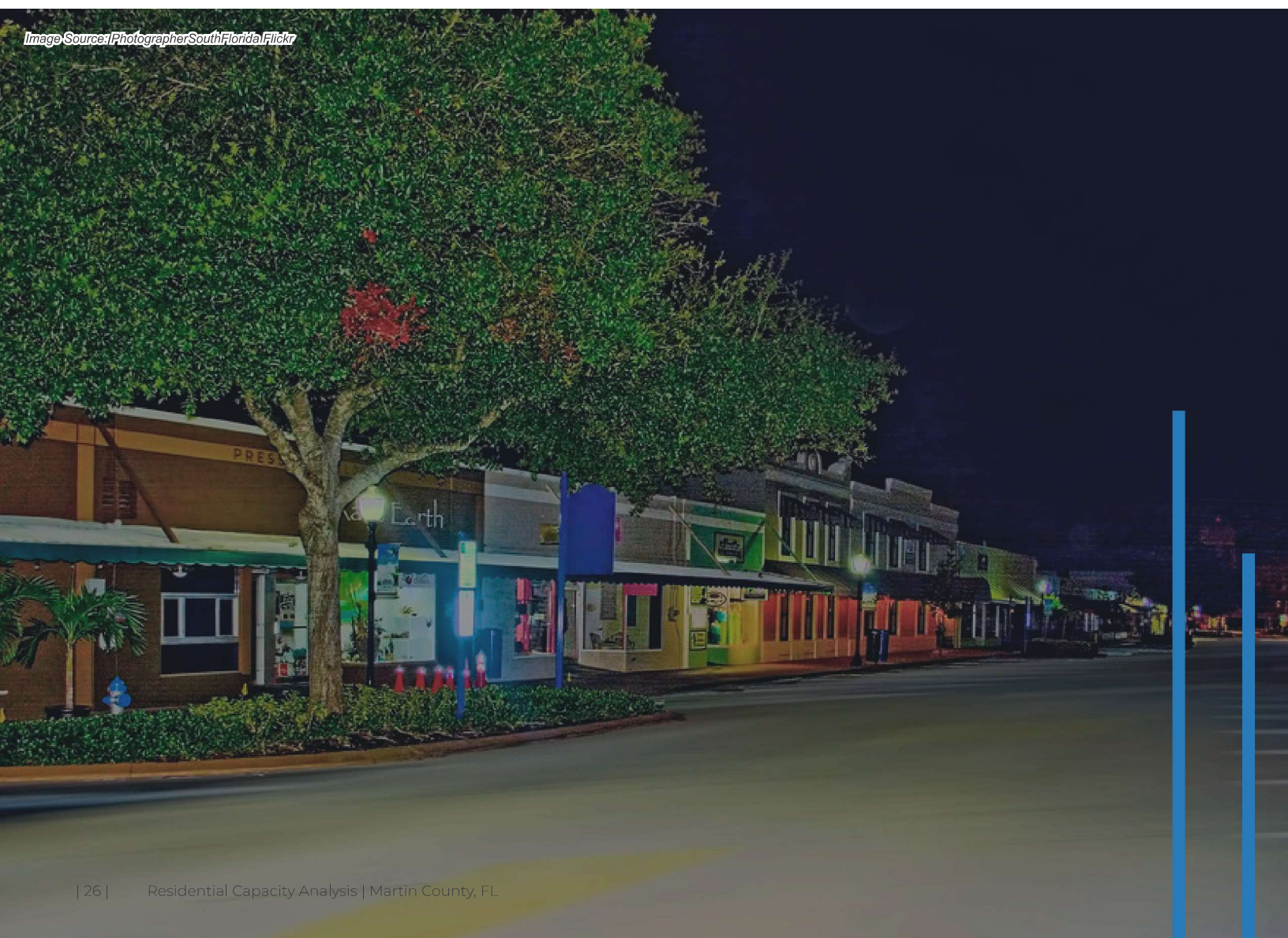
However, these potential units are not taken into consideration as supply in the calculation of residential capacity, because the vacant land is located outside of the USDs. Therefore, the County will need to either convert commercial lands to accommodate residential uses, increase residential densities within the USD, or expand its Urban Service Districts to address the growing residential demand.

The 375-acre Waterside development ("Project"), as proposed, is located adjacent to the PUSD and currently designated Agricultural according on the County's Future Land Use Map. Assuming the same seasonal and vacancy considerations contained in the supply and demand calculations, the Project's 1,050 proposed units will provide at least 807 *Occupied Housing Units* or *Households*. In total, if the Project as proposed were included within the PUSD and assigned an appropriate Future Land Use designation, then

residential capacity would increase from 101% to approximately 114% for the PUSD in the 10-year planning period, and would increase from approximately 65% to 73% for the PUSD in the 15-year planning period. While the proposed Project alone will not absolve the County from their obligation to expand residential capacity, it can accommodate a significant portion of future residential demand.

Without regard to the particulars of the Project, this analysis is a very conservative one. It reflects the County's required procedures, while identifying other issues that would suggest the numbers, certainly, could be much higher than projected. The implications of this conservative analysis are that the County will be substantively behind in its residential capacity to support new residential development, unless studies such as this one, take steps to become more timely and dynamic.

Image Source: /PhotographerSouthFlorida/Flickr



Appendix A-E Contents

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APPENDIX A: EXISTING CONDITIONS

Single-Family Inventory

According to the Martin County Tax Roll, Martin County currently has 82,120 units, 155,124,808 square feet of total living area, and 1,387,572,013 square feet of total land area. Over 96% of the County's single-family properties are in Unincorporated Martin County and Stuart. In terms of density, the average FAR is 0.11, and there are about 3 units per acre. Over 64% of the County's single-family properties were built before 1990. Less than 20% of Martin County's single-family properties were built in 2000 or later. **Table A1** displays the distribution of single-family properties by decade built for each jurisdiction in Martin County.

Table A1. Single-Family Units by Decade Built in Martin County

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
Before 1940	18	79	-	7	187	240	636
1940-1949	15	40	-	5	80	249	559
1950-1959	173	68	-	20	407	1,857	2,774
1960-1969	149	101	-	52	578	3,189	4,189
1970-1979	353	87	-	285	2,709	13,509	17,512
1980-1989	163	131	-	255	1,557	22,409	22,229
1990-1999	161	107	-	150	259	14,408	13,653
2000-2009	141	84	-	120	1,193	11,876	12,506
2010-2021	108	81	23	53	185	4,098	4,129

Sources: Martin County 2021 Final Tax Roll; GAI Consultants.

Multi-Family Inventory

According to the Martin County Tax Roll, Martin County currently has 8,130 units, 6,880,041 square feet of total living area, and 38,062,237 square feet of total land area. In terms of density, the average FAR is 0.18, and there are about 9 units per acre. The average unit square footage across all properties in Martin County is about 971 square feet. Averaged across all properties in Martin County, the vacancy rate is about 4.3% and the average effective rate per unit is about \$1,589. Only 16.2% of multi-family properties across all of Martin County contain 100 or more units, and the average effective rent per unit of these relatively high-density properties is \$2,128. 45.8% of Martin County's multi-family properties contain fewer than 10 units, suggesting that most of Martin County's multi-family inventory is relatively low-to-moderate density. The average effective rent of these low-to-moderate density properties is \$987 (based on a very limited sample size of 5 properties with data available). Regarding rent type, 72.5% of Martin County's multi-family properties are market-rate, whereas 7.7% offer affordable housing and 4.9% offer a mixture of both market-rate and affordable housing units. 52.1% of Martin County's multi-family properties were built before 1980. Only 12.7% of multi-family properties were built in 2000 or later. 95.1% of multi-family properties are in Unincorporated Martin County and Stuart, although there is also a sizable presence of multi-family properties in Indiantown as well.

Vacant Lands

Across all of Martin County, there are nearly 204,191 acres of vacant land. Of this total, about 3.1% is vacant residential land. 97.1% of this vacant residential land is in Unincorporated Martin County. Notably, nearly 88.7% of Martin County's vacant land is unimproved agriculture. 97.5% of this total is in Unincorporated Martin County. Indiantown also has a substantial amount of land (over 4,535 acres) designated as unimproved agriculture.

Residential Units by Year Built Trends

As shown in **Table A2**, Martin County experienced a gradual increase in the total number of residential units built per year from 2011 to 2015. Since 2015, however, Martin County has seen substantial fluctuations in the number of residential units built per year. In Unincorporated Martin County, the number of residential units built per year increased after 2011 for a few years before trending back downwards beginning in 2016. The steep drop-off in Unincorporated Martin County between 2020 and 2021 is noteworthy as well. In Stuart and Jupiter Island the number of residential units built per year has remained relatively constant and low throughout the entirety of the observed period. In Indiantown, the number of residential units built per year increased in the latter half of the decade but does not represent a major source of housing production within the County overall. Taking a broader look, **Table A3** depicts the age of housing units by year built over the last several decades.

Table A2. Housing Units by Year Built (2010-2021)

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
2010	5	1	-	1	10	255	272
2011	1	2	-	2	21	259	285
2012	1	4	-	5	13	354	377
2013	4	5	-	4	37	401	451
2014	7	5	-	3	29	433	477
2015	5	19	-	11	16	523	574
2016	20	13	-	5	9	496	543
2017	16	6	-	6	13	365	406
2018	22	14	-	7	18	377	438
2019	20	7	21	7	14	551	620
2020	7	4	2	2	2	122	139
2021	20	1	-	-	437	11	469

Sources: Martin County 2021 Final Tax Roll; GAI Consultants.

Table A3. Housing Units by Decade Built

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
Built 2020 or later	0	0	0	3	10	20	33
Built 2010 to 2019	10	70	158	38	366	3,143	3,627
Built 2000 to 2009	120	94	4	246	1,501	10,108	12,069
Built 1990 to 1999	678	75	2	125	932	11,345	13,155
Built 1980 to 1989	637	134	10	286	2,100	21,707	24,864
Built 1970 to 1979	617	66	22	278	2,974	14,238	18,173
Built 1960 to 1969	113	65	27	45	576	3,683	4,482
Built 1950 to 1959	53	80	7	0	630	2,335	3,098
Built 1940 to 1949	0	27	0	0	145	242	414
Built 1939 or earlier	37	62	0	18	408	629	1,154
Total	2,265	673	230	1,039	9,642	67,450	81,069

Sources: U.S. Census American Community Survey 2021; GAI Consultants. Notes: The data from this table reflects a snapshot of Martin County's housing stock in 2021. Discrepancies between the data in this table and Table 20 are due to the fact that the data were collected from different sources.

According to **Table A3**, over 64% of Martin County's housing stock was built before 1990, and housing production in the County has markedly lagged since then. The two largest concentrations of housing production, unsurprisingly, are Unincorporated Martin County and Stuart, with the former comprising over 83% of the total housing stock. Building permit data provides further insight into housing production trends over time.

Total Housing Unit Building Permit Trends

Table A4 shows that the number of residential building permits issued annually in Martin County has fluctuated quite a bit over the past 10 years, following a period of significantly greater permit activity between 2002 and 2006 and a steep drop-off in permit activity in the ensuing five years. **Tables A5-A9** illustrate the residential building permits issued annually by incorporated places within Martin County from 2002 to 2006; whereas **Table A10** illustrates the residential building permits issued annually in Unincorporated Martin County during this same time period.

Table A4. Housing Unit Building Permits in Martin County, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	1,440	37	1,477	97%	3%
2003	1,390	616	2,006	69%	31%
2004	1,243	216	1,459	85%	15%
2005	1,120	886	2,006	56%	44%
2006	926	28	954	97%	3%
2007	314	48	362	87%	13%
2008	170	50	220	77%	23%
2009	113	14	127	89%	11%
2010	167	32	199	84%	16%
2011	205	19	224	92%	8%
2012	299	21	320	93%	7%
2013	474	11	485	98%	2%
2014	366	66	432	85%	15%
2015	314	89	403	78%	22%
2016	291	94	385	76%	24%
2017	292	46	338	86%	14%
2018	338	44	382	88%	12%
2019	353	4	357	99%	1%
2020	392	15	407	96%	4%
2021	403	127	530	76%	24%
2022 ⁽¹⁾	403	875	1,278	32%	68%

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Table A5. Housing Unit Building Permits in Indiantown, by Year (2018-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2018 ⁽¹⁾	6	0	6	100%	0%
2019	11	0	6	100%	0%
2020	8	0	8	100%	0%
2021	5	10	15	33%	67%
2022 ⁽²⁾	4	16	20	20%	80%

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Notes: (1) There is no data available prior to 2018. (2) 2022 data does not yet reflect year-end totals.

Table A6: Housing Unit Building Permits in Jupiter Island, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	10	0	10	100%	0%
2003	10	0	10	100%	0%
2004	12	0	12	100%	0%
2005	5	0	5	100%	0%
2006	5	0	5	100%	0%
2007	11	0	11	100%	0%
2008	7	0	7	100%	0%
2009	9	0	9	100%	0%
2010	6	0	6	100%	0%
2011	5	0	5	100%	0%
2012	3	0	3	100%	0%
2013	10	0	10	100%	0%
2014	11	0	11	100%	0%
2015	0	0	0	-	-
2016	0	0	0	-	-
2017	0	0	0	-	-
2018	0	0	0	-	-
2019	0	0	0	-	-
2020	0	0	0	-	-
2021	0	0	0	-	-
2022 ⁽¹⁾	5	0	5	-	-

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Table A7. Housing Unit Building Permits in Ocean Breeze, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	0	0	0	-	-
2003	0	0	0	-	-
2004	0	0	0	-	-
2005	0	0	0	-	-
2006	0	0	0	-	-
2007	0	0	0	-	-
2008	0	0	0	-	-
2009	0	0	0	-	-
2010	0	0	0	-	-
2011	0	0	0	-	-
2012	0	0	0	-	-
2013	0	0	0	-	-
2014	0	0	0	-	-
2015	0	0	0	-	-
2016	0	0	0	-	-
2017	0	0	0	-	-
2018	0	0	0	-	-
2019	0	0	0	-	-
2020	0	0	0	-	-
2021	4	0	4	100%	0%
2022 ⁽¹⁾	0	0	0	-	-

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Table A8. Housing Unit Building Permits in Sewall's Point, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	7	0	7	100%	0%
2003	8	0	8	100%	0%
2004	10	0	10	100%	0%
2005	10	0	10	100%	0%
2006	5	0	5	100%	0%
2007	6	0	6	100%	0%
2008	4	0	4	100%	0%
2009	3	0	3	100%	0%
2010	2	0	2	100%	0%
2011	4	0	4	100%	0%
2012	4	0	4	100%	0%
2013	7	0	7	100%	0%
2014	7	0	7	100%	0%
2015	0	0	0	-	-
2016	0	0	0	-	-
2017	0	0	0	-	-
2018	0	0	0	-	-
2019	0	0	0	-	-
2020	0	0	0	-	-
2021	4	0	4	100%	0%
2022 ⁽¹⁾	12	0	12	100%	0%

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Table A9. Housing Unit Building Permits in Stuart, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	110	0	110	100%	0%
2003	101	502	603	17%	83%
2004	71	38	109	65%	35%
2005	32	519	551	6%	94%
2006	8	8	16	50%	50%
2007	13	0	13	100%	0%
2008	2	0	2	100%	0%
2009	0	0	0	-	-
2010	16	0	16	100%	0%
2011	13	0	13	100%	0%
2012	20	0	20	100%	0%
2013	35	11	46	76%	24%
2014	20	0	20	100%	0%
2015	0	0	0	-	-
2016	0	0	0	-	-
2017	0	0	0	-	-
2018	0	0	0	-	-
2019	0	0	0	-	-
2020	0	0	0	-	-
2021	0	0	0	-	-
2022 ⁽¹⁾	91	712	803	11%	89%

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Table A10: Housing Unit Building Permits in Unincorporated Martin County, by Year (2002-2022)

	UNITS			PERCENT	
	SF UNITS	MF UNITS	TOTAL	SF UNITS	MF UNITS
2002	1,313	37	1,350	97%	3%
2003	1,271	114	1,385	92%	8%
2004	1,150	178	1,328	87%	13%
2005	1,073	367	1,440	75%	25%
2006	908	20	928	98%	2%
2007	284	48	332	86%	14%
2008	157	50	207	76%	24%
2009	101	14	115	88%	12%
2010	143	32	175	82%	18%
2011	183	19	202	91%	9%
2012	272	21	293	93%	7%
2013	422	0	422	100%	0%
2014	328	66	394	83%	17%
2015	314	89	403	78%	22%
2016	291	94	385	76%	24%
2017	292	46	338	86%	14%
2018	332	44	376	88%	12%
2019	342	4	346	99%	1%
2020	384	15	399	96%	4%
2021	390	117	507	77%	23%
2022 ⁽¹⁾	291	147	438	66%	34%

Sources: State of Cities Data Systems (SOCDS) Building Permits Database; GAI Consultants. Note: (1) 2022 data does not yet reflect year-end totals.

Virtually all the incorporated places within Martin County exhibit no clear trend in permit activity, with many years of scant, if any permits issued. Indiantown, since being incorporated in December 2017, has seen relatively constant permit activity, while Jupiter Island and Sewall's Point went from experiencing relatively constant permit activity from 2002 to 2014 to having virtually none since. Ocean Breeze has seen virtually no permit activity since 2002. Stuart experienced relatively high permit activity between 2002 and 2005, relatively low activity between 2006 and 2014, no activity from 2015 to 2021, and a substantial spike in activity in 2022. Activity in Unincorporated Martin County reflects that described for the County as a whole.

Single- and Multi-Family Housing Unit Building Permit Trends

As demonstrated in **Table A4**, in every year observed except 2022 Martin County saw significantly higher numbers of single-family building permits than multi-family building permits. This pattern is largely reflected within each of the incorporated places as well as Unincorporated Martin County (see **Tables A4-A10**). In fact, Jupiter Island, Ocean Breeze, and Sewall's Point saw zero multi-family permits issued in the observed period. Indiantown has experienced low permit activity since its incorporation in 2017, but it is potentially noteworthy that in the past two years there have been more multi-family permits issued than single-family permits. Stuart occasionally sees spikes in multi-family permit activity, such as in 2003, 2005, and 2022.

Housing Unit Growth Per Capita of Population Change

It is also useful to consider how housing unit production compares to population growth over time. **Table A11** shows how housing unit production in Martin County consistently lags behind population growth.

Table A11: Housing Unit Growth Per Capita of Population Change in Martin County (2010-2021)

	MARTIN COUNTY	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED
2010	0.49	-	0.00	-	-	0.20	0.34
2011	0.40	-	0.11	-	0.08	2.33	0.49
2012	0.37	-	0.01	-	0.05	0.08	1.21
2013	0.73	-	-	-	-	0.23	0.70
2014	0.25	-	-	-	1.50	0.21	0.32
2015	0.58	-	9.50	-	0.42	0.42	0.71
2016	0.20	-	-	-	0.28	0.26	0.24
2017	0.12	-	0.35	-	0.18	0.05	0.17
2018	0.12	1.05	4.67	-	0.58	0.23	0.14
2019	-	-	-	-	-	0.02	-
2020	0.18	0.35	-	0.08	0.33	0.01	0.38
2021	0.18	2.00	-	0.00	0.00	0.40	0.01

Sources: Martin County Final 2021 Tax Roll; 2010 U.S. Census, ACS; BEBR; GAI Consultants. Note: Cells populated with a dash are excluded from this table when the respective jurisdiction experienced negative population growth.

Pace of Housing Production within Developments of Regional Impact (DRI)

Pursuant to Section 380.06(1), Florida Statutes (F.S.), a Development of Regional Impact (DRI) is defined as "any development which, because of its character, magnitude, or location, would have a substantial effect upon the health, safety or welfare of citizens of more than one county." Because of the nature of DRIs, they can be indicative of conditions within a region which may not be as evident in a narrower geographical context. In the case of Martin County, we examined five (5) of the more well-known DRIs within the County to determine if the pace of development of these DRIs was consistent with the declining housing production described in **Table A4** and **Table A10**. As is shown in **Table A12**, this examination revealed average annual production for the selected DRIs of just 53 residential units per year, representing an average of 34 years to complete land development and production of the DRIs permitted residential units. Further, only one (1) of the five (5) DRIs examined built all of the residential units which their DRI permitted, with an average of just 69% of permitted residential units actually being produced.

Table A12. DRI Pace of Production – Martin County

DRI	YEAR APPROVED	LAND AREA (ACRES)	APPROVED RESIDENTIAL UNITS	RESIDENTIAL UNITS BUILT TO DATE	YEAR COMPLETE	YEARS OF PRODUCTION TO DATE	AVERAGE ANNUAL RESIDENTIAL UNIT PRODUCTION
Martin Downs	1980	2,418	5,500	3,955	2008	28	141
West Jensen	1988	1,156	1,615	1,245	2022	34	37
Willoughby	1985	660	3,156	881	2009	24	37
Sailfish Point*	1979	553	765	538	n/a	43	13
Mariner Sands	1974	717	1,615	1,615	2016	42	38
AVERAGE						34	53

Sources: Department of Economic Opportunity DRI Repository; GAI Consultants. Note(s): *Sailfish Point has platted residential lots which remain undeveloped, as of year-end 2022, there were six (6) vacant platted lots remaining within Sailfish Point.

Housing Unit Losses to Conversions and Demolitions

It is important to note that housing supply can shrink from losses due to demolitions and conversions. Housing removal due to demolitions involves the destruction of existing housing units, whereas housing removal due to conversions entails changing the use of an existing structure from residential to non-residential. These types of data have historically been collected as part of the Components of Inventory Change (CINCH) report conducted every two years by the Office of Policy Development and Research, which is part of the U.S. Department of Housing and Urban Development (HUD). The data for these reports comes from the American Housing Survey (AHS), which is also sponsored by HUD and conducted by the U.S. Census Bureau. The CINCH report was last published in 2017. Therefore, historical trends in housing removal are considered as the average percentage of the total housing stock lost due to demolitions and conversions from the most recent nine-year period of available data. We display our findings in **Table A13**.

Table A13. Housing Unit Losses to Conversions and Demolitions, Nationwide (2009-2017)

YEARS	CONVERSIONS	% OF TOTAL HOUSING STOCK	DEMOLITIONS	% OF TOTAL HOUSING STOCK	TOTAL HOUSING STOCK
2009-2011	100,000	0.08%	519,000	0.40%	130,112,000
2011-2013	98,000	0.07%	470,000	0.35%	132,419,000
2015-2017	53,300	0.04%	325,000	0.24%	134,790,000
AVERAGE		0.06%		0.33%	

Sources: CINCH; GAI Consultants.

Density Trends

In terms of densities, we can examine how the average units per acre for a parcel of improved residential land has changed over time by grouping properties by year built. In **Table A14**, we can see that single-family densities in Martin County were particularly low in the 1970s and particularly high in the 1980s, 1990s, and 2000s. Also, densities steeply decreased from 2010 to 2021. Trends are similar for Unincorporated Martin County, although it is notable that before 1940 the average units per acre for single-family units was 0.87 lower than that of the County as a whole. Stuart, on the other hand, experienced relatively high single-family densities before 1940 and from 1990 to 1999, but it saw relatively low densities in the 1980s, 2000s, and 2010s.

Examining multi-family density trends in **Table A15**, we can see that the average units per acre in Martin County was relatively high through the 1940s but significantly decreased in the subsequent decades. Unincorporated Martin County reflects similar trends but tends to run below the County overall in most decades. Densities in Stuart, however, run higher than the County overall in most decades, particularly from 1960 onwards.

Table A14. Average Units Per Acre by Decade Built, Single-Family

	TOTAL COUNTY	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED
Before 1940	4.56	4.68	1.78	-	1.53	6.39	3.69
1940-1949	5.03	5.90	1.53	-	2.24	5.74	5.04
1950-1959	4.71	5.35	1.87	-	2.41	4.74	4.65
1960-1969	4.97	4.62	1.55	-	2.36	6.82	4.64
1970-1979	3.18	5.89	1.53	-	2.35	1.77	3.42
1980-1989	6.75	6.75	1.51	-	2.18	0.59	7.74
1990-1999	5.78	7.57	1.51	-	1.97	7.55	6.01
2000-2009	9.06	5.90	1.34	-	1.89	2.62	8.97
2010-2021	4.39	6.50	1.12	1.57	1.64	2.93	4.25

Sources: Martin County Final 2021 Tax Roll; GAI Consultants.

Table A15. Average Units Per Acre by Decade Built, Multi-Family

	TOTAL COUNTY	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED
Before 1940	22.24	-	-	-	-	27.79	16.30
1940-1949	20.32	26.09	-	-	-	19.41	18.47
1950-1959	11.97	7.91	-	-	-	12.36	12.01
1960-1969	13.96	27.54	-	-	-	17.64	10.39
1970-1979	9.76	10.37	-	-	-	11.63	9.70
1980-1989	9.44	8.24	-	-	-	14.85	9.53
1990-1999	9.87	9.72	-	-	-	15.78	8.88
2000-2009	9.71	6.45	-	-	-	19.79	9.31
2010-2021	11.46	40.82	-	-	-	15.80	8.63

Sources: Martin County Final 2021 Tax Roll; GAI Consultants.

Rental and Ownership Trends

With regards to rental and ownership products, **Table A16** shows that the percentage of owner-occupied housing units has remained consistently higher than the percentage of renter-occupied units since 2010. This further supports the suggestion that single-family units have remained predominant in Martin County for quite some time.

Table A16. Percentage of Households by Renters and Owners in Martin County (2010-2021)

	RENTED	OWNED
2010	19%	74%
2011	21%	79%
2012	23%	77%
2013	24%	76%
2014	24%	76%
2015	24%	76%
2016	24%	76%
2017	23%	77%
2018	22%	78%
2019	22%	78%
2020	19%	75%
2021	21%	79%

Sources: U.S. Census, ACS; GAI Consultants.

Vacancy Trends

It is also important to consider vacancy rates when determining the amount of housing units necessary to accommodate future growth. **Table A17** displays vacancy rates from 2010 to 2022 in Martin County and each of its jurisdictions. The overall vacancy rate in Martin County has been in the range of 18-24% for most of the past decade. Vacancy rates are relatively high in the wealthy town of Jupiter Island and the mobile-home town of Ocean Breeze, but in the County's other incorporated places the vacancy rate has ranged between 10% and 28%. Notably, there appears to have been a slight decrease in vacancy rates in Stuart, Unincorporated Martin County, Jupiter Island, and the County overall after 2019. This correlates with our finding in Table A2 that Martin County experienced a significant decrease in housing production from 2019 to 2020.

Table A17. Vacancy Rates in Martin County (2010-2022)

	TOTAL COUNTY	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED
2010	18%	11%	44%	43%	11%	22%	17%
2011	24%	17%	65%	44%	24%	28%	23%
2012	24%	17%	62%	50%	26%	26%	23%
2013	23%	18%	62%	56%	21%	27%	22%
2014	23%	19%	61%	61%	14%	24%	22%
2015	21%	17%	60%	59%	13%	22%	21%
2016	20%	20%	61%	56%	10%	23%	19%
2017	20%	23%	61%	54%	11%	24%	19%
2018	20%	19%	58%	53%	10%	24%	19%
2019	19%	-	57%	39%	10%	23%	19%
2020	16%	10%	50%	48%	11%	17%	15%
2021	18%	13%	48%	30%	12%	19%	18%
2022*	15%	9%	50%	47%	10%	18%	15%

Source: U.S. Census, ACS; ESRI; GAI Consultants.

Table A18 depicts the types of vacancy statuses in Unincorporated Martin County. These vacancy statuses include For rent; Rented, not occupied; For sale, only; Sold, not occupied; and For migrant workers. The category capturing all other vacant units in the County spiked from 2017 to 2020, reaching a value of 46% in 2020 before falling back down to 9% in 2021. We will now separately discuss the final type of vacancy status: seasonal, recreational, or occasional use.

Table A18. Vacancy Statuses in Unincorporated Martin County (2010-2021)

	FOR RENT	RENTED, NOT OCCUPIED	FOR SALE, ONLY	SOLD, NOT OCCUPIED	SEASONAL, RECREATIONAL, OCCASIONAL	FOR MIGRANT WORKERS	OTHER VACANT	TOTAL VACANT
2010⁽¹⁾	15%	1%	13%	3%	56%	0%	15%	11,242
2011	8%	1%	12%	3%	72%	0%	3%	14,690
2012	8%	1%	10%	3%	75%	0%	2%	14,678
2013	8%	1%	8%	3%	75%	0%	4%	14,420
2014	8%	2%	8%	3%	71%	0%	7%	14,238
2015	8%	2%	7%	2%	72%	0%	9%	13,569
2016	8%	1%	6%	2%	68%	0%	14%	12,697
2017	9%	1%	6%	2%	59%	0%	23%	12,615
2018	7%	2%	6%	2%	56%	0%	28%	12,714
2019	6%	1%	6%	2%	52%	0%	33%	12,929
2020⁽¹⁾	6%	5%	6%	2%	61%	0%	46%	10,111
2021	5%	3%	6%	2%	59%	0%	9%	12,281

Source: U.S. Census, ACS; GAI Consultants. Note: (1) Represents census data.

Seasonal Unit Trends

The percentage of vacant units that are used seasonally, recreationally, or occasionally in Unincorporated Martin County and each of its jurisdictions is displayed in **Table A18**. This figure has remained over 50% since 2010, and it was over 70% from 2011 to 2015. Unincorporated Martin County captures over 80% of the overall County's housing units, so the considerable share of vacant units that are used seasonally, recreationally, or occasionally may have impacted the total inventory of housing and the total lands needed to support production within Martin County.

APPENDIX B: DEVELOPMENT ACTIVITY

Proposed Developments Overview

Across Martin County and each of its respective incorporated jurisdictions, there are currently 5,405 new units on about 5,178 acres of land that have been proposed for residential or mixed-use development. Only 60 of these units are proposed for development in Stuart, whereas the rest are proposed in Unincorporated Martin County. The units proposed for Unincorporated Martin County are relatively evenly spread across four of its five taxing districts, with only District 2 lagging significantly behind the others. Only 38 of these 5,405 proposed units have been built thus far, and most of the projects that have been approved have not yet begun construction of units. Only two projects are currently under construction, and only one project has fully completed construction. 22 projects were still in review. The 60 units proposed in Stuart have not yet been built, and the status of the corresponding project is unknown at this time.

Proposed Developments, Approved and Pending Construction

Out of the 5,405 units that have been proposed across all of Martin County, 3,807 of them have been approved but have yet to see any units constructed. These 3,807 units, as proposed, sit on over 2,741 acres of land. All these units are in Unincorporated Martin County, with the highest concentration of units contained within District 5 and District 3. **Table B.1** provides a listing of all residential and mixed-use projects in Martin County that have been approved but have yet to begin construction.

Table B1. Unincorporated Martin County Proposed Developments, Approved and Pending Construction

PROJECT NAME	ACRES	TOTAL UNITS	UNITS BUILT	USE	PROJECT STATUS
Cove Salerno Partners PUD Zoning & Major Master Site Plan	47.12	216	0	Residential	Approved
Algozzini Place Minor Final Site Plan	6.43	20	0	Residential	Approved
Banyan Bay PUD Phase 3 Revised Master Final Site Plan	185.12	72	0	Residential	Approved
Banyan Bay PUD Revised Master & Phasing Plan 9 th PUD Amendment & Ph2c Final Site Plan	12.9	36	0	Residential	Approved
Beacon 21 PUD Zoning Master and Final Site Plan	4.84	29	0	Residential	Approved
Cottages At Coconut Cay (Summerland Place) Minor Final Site Plan	1.99	20	0	Residential	Approved
Cove Royale PUD Revised Major Master & Final Site Plan & PUD Zoning & Master Site	97.13	118	0	Residential	Approved
Crystal Cove Revised Minor Final Site Plan	1.94	16	0	Residential	Approved
Discovery PUD Zoning and Master Site Plan	1,530	317	0	Residential/ Recreational	Approved
Highpointe (Pulte at Christ Fellowship) Major Final Site Plan	175	94	0	Residential	Approved
Hunter Lake, Minor Final	9.4	20	0	Residential	Approved
Kanner 5601, LLC Major Final Site and Kanner Lake	26.02	65	0	Residential	Approved
Kanner Oaks Minor Final Site Plan	16.89	28	0	Residential	Approved
Newfield (Pineland Prairie) Major Master Site Plan	139	1,250	0	Residential	Approved
Palm City Ga Homes (Palm Bluff Townhomes) PUD Final Site Plan	3.57	28	0	Residential	Approved
Pentalago Rev Maj Master & Ph 1 Final	212.1	42	0	Residential	Approved
Pulte PUD At Christ Fellowship PUD Zoning & Master Site Plan	20	313	0	Residential/ Recreational	Approved
Rio Marine Village Revised Master Site Plan	15.46	198	0	Residential	Approved
Sabal Point (Jensen Dunes) Major Master & Final Site Plan	30.26	68	0	Residential	Approved
Showcase PUD (Cove Salerno) Ph1 PUD Final Site Plan	35.84	79	0	Residential	Approved
Altis Minor Final Site Plan-Mixed Use Residential	0.29	4	0	Residential/ Commercial	Approved
Oaks (Mapp Road Parcel) Minor Final Site Plan	11.59	24	0	Residential	Approved
Preserve at Rio Marine Village Major Master Site Plan	8.95	145	0	Residential	Approved
Reserve at Jensen Beach (Savannah Apartments) Revised Major Master & Final Site Plan	22.03	197	0	Residential	Approved
Tradewinds Of Hobe Sound Major Final Site Plan	12.96	177	0	Residential	Approved
Via Claudia PUD Zoning Master & Final Site Plan	96.18	114	0	Residential	Approved
Willoughby Townhomes Major Final Site Plan & PUD Final Site Plan	18.5	117	0	Residential	Approved

Sources: Martin County Proposed Development Projects database; GAI Consultants.

Proposed Developments, Approved and Under Construction

Only two of the proposed developments can be confirmed to currently be in the process of constructing new units. These two projects are Bridgewater Reserve PUD, which is located in District 3 of Unincorporated Martin County and has completed three units on the project's 107 plats of land, and Floridian Golf Club PUD, which is located in District 5 of Unincorporated Martin County and has 14 units completed out of the project's total of 36 units. These projects are being built on about 337 acres of land. **Table B2** provides a listing all residential and mixed-use projects in Martin County that have been approved but are still under construction.

Table B2. Unincorporated Martin County Proposed Developments, Approved and Under Construction

PROJECT NAME	ACRES	TOTAL UNITS	UNITS BUILT	USE	PROJECT STATUS
Bridgewater Preserve PUD Revised PUD Agreement Master & Final Site Plan and PUD Rezoning & Master	215	107	3	Residential	Approved
Floridian Golf Club PUD Phase 4 Administrative Amendment & 6 th PUD Amendment Phase 3 & 4	122	36	14	Residential/ Recreational	Approved

Sources: Martin County Proposed Development Projects database; GAI Consultants.

Proposed Developments, In Review

Out of the 5,405 units that have been proposed across all of Martin County, 1,434 of them have been approved but have yet to see any units begin to be constructed. These 1,434 units are proposed to sit on over 269 acres of land. 1,374 of these units are in Unincorporated Martin County, with the highest concentration of units contained within District 4. The remaining 60 units are proposed to be built in Stuart. **Table B4** provides a listing all residential and mixed-use projects in Martin County that are currently in review.

Table B4. Unincorporated Martin County Proposed Developments, In Review

PROJECT NAME	ACRES	TOTAL UNITS	UNITS BUILT	USE	PROJECT STATUS
Glades Crossing Minor Final Site Plan	14.18	10	0	Residential	In Review
Hobe Lakes Estates Minor Final Site Plan	60	12	0	Residential	In Review
I-95 Riverside PUD 9 th Amend Rev Master and Ph Iv Final Site Plan	12.33	98	0	Residential	In Review
Jupiter Bay Holdings Multi-Family Minor Final Site Plan	0.92	14	0	Residential	In Review
Jupiter Narrows PUD Revised PUD Zoning Master and Final Site Plan	-	-	-	Residential/ Recreational	In Review
Loggerhead Estates II Minor Final Site Plan	4.54	23	0	Residential	In Review
Martin Hwy Multi-Family Major Final Site Plan	6.09	90	0	Residential	In Review
Paddock Palm City PUD Major Master Final Site Plan	8.29	60	0	Residential	In Review
Pepperwood Assemblage PUD Zoning Master & Final Site Plan	29.23	43	0	Residential	In Review
Port Cove PUD	4.84	29	0	Residential	In Review
Pulte Aquarius PUD	35.04	272	0	Residential	In Review
Riverside Major Master Site Plan	7.73	95	0	Residential/ Commercial	In Review
Sand Pine Ridge Minor Final Site Plan	4.27	56	0	Residential	In Review
Showcase PUD Ph II	10.52	88	0	Residential	In Review
Solana PUD (Armellini Ave) PUD Rezoning & Final Site Plan	11.2	98	0	Residential	In Review
Sunset Trail Estates	11.7	28	0	Residential	In Review
The Cove at Hobe Sound Minor Final Site Plan	4.88	38	0	Residential	In Review
The Cove Minor Final Site Plan	2.32	48	0	Residential	In Review
The Martin Apartments Minor Final Site Plan	1.25	24	0	Residential	In Review
The Preserve at Salerno PUD Zoning Master Final Site Plan	8.81	79	0	Residential	In Review
West Jensen PUD 14 th PUD Amendment Phase 1b Master & Final Site Plan	26	169	0	Residential	In Review

Sources: Martin County Proposed Development Projects database; GAI Consultants.

Approved (Pending Construction) Project Descriptions

Cove Salerno Partners PUD Zoning & Major Master Site Plan – On July 14, 2020, the Board of County Commissioners approved of a rezoning to a planned unit development (PUD) and a PUD zoning agreement including a master site plan and phasing plan for the Showcase PUD Project. The project consists of 54 two-story townhomes and 162 duplex units on an approximate 47.12-acre parcel located between SE Cove Road and SE Salerno Road just east of SW Kanner Highway in Stuart.

Algozzini Place Minor Final Site Plan – In 2020, the Board of County Commissioners approved a 20-unit multi-family residential development located on an approximate 6.43-acre parcel located between US Highway 1 and SE Dixie Highway approximately one-half mile north of SE Bridge Road in Hobe Sound.

Banyan Bay PUD Phase 3 Revised Master Final Site Plan – On August 16, 2022, the Board of County Commissioners approved a request by the Farrell Building Company for the 10th Amendment to the Banyan Bay Planned Unit Development (PUD) Zoning Agreement. The amendment consists of a revised master plan and the Phase 3 final site plan. Banyan Bay received master plan and PUD zoning approval on November 9, 2004. The residential development is situated on an approximate 251-acre parcel located on the west side of SW Kanner Highway and is accessed at the signalized intersection with SE Pomeroy Street in Stuart. The Phase 3 final site plan consists of 72 multi-family residential units and the associated infrastructure on approximately 12 undeveloped acres of the Banyan Bay development. The proposed apartment units are housed in three buildings, which are each three stories in height. The Banyan Bay project has a total of 293 residential units resulting in a density of 1.17 units per acre.

Banyan Bay PUD Revised Master and Phasing Plan 9th PUD Amendment And Ph 2c Final Site Plan – On September 29, 2020, the Board of County Commissioners approved a request by Banyan Bay Macks, LLC for the 9th Amendment to the PUD zoning agreement including a revised master and phasing plan and Phase 2C final site plan approval for the Banyan Bay PUD. The main entrance to the project is located at the intersection of SW Kanner Highway (SR 76) and SE Pomeroy Street in Stuart. The 251-acre property is an existing residential PUD located between South Kanner Highway and the South Fork of the St. Lucie River in Stuart. The approved PUD Master Plan allows for 305 dwelling units in five phases with an overall project completion deadline in 2027. The final site plan for Phase 1 was approved in 2005 and the Phase 1 plat was approved in 2008. Phase 1, which includes the main entrance, the Preserve Area Management Plan (PAMP) for the entire site and 74 detached single family homesites has been completed and Phase 2A and 2B are under construction (although no units have been built thus far). The proposed 9th PUD Amendment is solely limited to reducing the number of units and changing the product type in Phase 2C from 48 duplex units to 36 single family units, thereby reducing the total residential units in the development to 293. Phase 2C consists of 36 residential units on approximately 12.93 acres.

Beacon 21 PUD Zoning Master and Final Site Plan – On September 27, 2022, the Board of County Commissioners approved a request by Oskjn Jensen, LLC for a Planned Unit Development (PUD) Zoning Agreement including Master/Final Site Plan and Preserve Area Management Plan (PAMP) approval. This is the 6th amendment to the PUD zoning agreement for Beacon 21 and consists of 29 residential townhome units on an approximately 4.84-acre parcel, resulting in a residential density of 5.99 units per acre. The site is located on the south side of NE Dixie Highway about 1.2 miles from NE Palmer Street in Rio. The subject property is currently included in the Beacon 21 PUD and has a future land use designation of Medium Density. The site received prior approval of a master site plan for the construction of 32 residential units in

2007. That application as proposed as Phase 4 of the Beacon 21 PUD, which was established in the late 1970s and has since been amended five times. Phase 4 was never built, though. All prior development orders for the subject property expired in 2009.

Cottages At Coconut Cay (Summerland Place) Minor Final Site Plan – This was a request by Summerland Place, LLC that received approval for a final site plan to develop 20 dwelling units and supporting infrastructure on 2.0 acres, resulting in a gross residential density of 10 units per acre. The undeveloped site is located on the west side of SE Morningside Dr, which is approximately 600 feet southwest of SE Federal Highway in Stuart.

Cove Royale PUD Revised Major Master & Final Site Plan – On May 5, 2020, the Board of County Commissioners approved a request by TLH-82 DOT, LLC for the First Amendment to the Cove Royale Planned Unit Development (PUD) Zoning Agreement in order to phase the development of the 118-unit single-family development. The Board also approved the Phase 1 final site plan consisting of 81 single family detached homes and the associated infrastructure. The PUD Zoning Agreement including a master and final site plan was approved on March 26, 2019. The project is situated on an approximate 97-acre parcel located on the south side of SE Cove Road approximately 1.75 miles west of US Highway 1 in Stuart. The projects' buildout would have a density of 1.22 units per acre. On November 14, 2017, the Board approved a future land use designation change from Rural Density on one unit per two acres to Residential Estate density, allowing up to two units per acre.

Cove Royale PUD Zoning and Master Site – On March 26, 2019, the Board of County Commissioners approved a zoning district change from A-1, Small Farms District, to PUD, Planned Unit Development District. The Board also approved a concurrent request for a PUD Zoning Agreement and master final site plan approval of 118 single family residential lots on approximate 97-acre undeveloped parcel. The project is located on the south side of SE Cove Road approximately 1.75 miles west of US Highway 1 and about 1.4 miles east of SW Kanner Highway in Stuart. The subject property received approval for a future land use amendment from Rural Density (one unit per two acres) to Estate Density (two units per acre) on November 14, 2017. The future land uses in the area are a mix of Rural Density and Estate Density, allowing up to two units per acre.

Crystal Cove Revised Minor Final Site Plan – A request by Crystal Cove Waterway, LLC was approved for a minor development, revised final site plan for a residential development. This project consists of 16 townhomes in three buildings on 1.92 acres, resulting in a gross residential density of 8.33 units per acre. The site is located on the east side of SE Federal Highway approximately 475 feet north of SE County line Road in Tequesta.

Discovery PUD Zoning And Master Site Plan – This was a request by Becker B-14 Grove, Ltd. and Hobe sound Equestrian LLC for PUD Zoning and Master site plan for the development of 317 residential lots, an 18-hole golf course, golf and recreation club and polo facilities and the associated infrastructure on a previously developed approximate 1,530-acre site located on the north side of SE Bridge Road and approximately 1 mile east of the I-95 interchange. This request is currently under a final review.

Highpointe (Pulte at Christ Fellowship) Major Final Site Plan – On September 28, 2021, the Board of County Commissioners approved a request for Phase 1 final site plan for the Highpointe PUD (Pulte at Christ Fellowship). The final site plan includes 94 single family lots and the associated infrastructure on approximately 175 acres of the 321-acre project. Phase 1 also includes the 10-acre site proposed for

donation to Operation 300. The Highpointe project is located on the east side of SW Pratt Whitney Road approximately one mile east of SW Kanner Highway in Stuart. The Highpointe PUD project received zoning and master site plan approval on April 27, 2021. Phase 1 of the Highpointe PUD project will include 94 single family lots on an approximate 175-acre portion of the overall 321-acre project, as well as construction of the main entrance into the project.

Hunter Lake, Minor Final – A request was approved for a minor development final site plan proposing a residential subdivision consisting of 20 single family lots on approximately 9.4 acres and resulting in a gross residential density of 2.13 units per acre. The undeveloped site is located on the north side of SE Salerno Rd. approximately 750 feet west of SE Federal Highway.

Kanner 5601, LLC Major Final Site – On August 21, 2018, the Board of County Commissioners approved a request by Kanner 5601, LLC for a major final site plan for a proposed residential subdivision consisting of 65 single family lots with associated infrastructure and preserve areas, resulting in a gross residential density of 2.49 units per acre. The subject site is approximately 26.02 acres and is located on the east side of Kanner Highway approximately 100 feet south of SW Linden Street in Stuart.

Kanner Lake – On March 16, 2021, the Board of County Commissioners approved a request by Kanner 5601, LLC for a revised final site plan that addressed minor boundary adjustments that became clear during preparation of the plat. This is part of the Kanner 5601, LLC Major Final Site project listed above.

Kanner Oaks Minor Final Site Plan – A request was approved for a minor final site plan, which entails the development of 28 detached single-family homes and the associated infrastructure. It is located on an approximate 16.86-acre undeveloped parcel on the west side of S Kanner Highway approximately a quarter mile south of SW Locks Road in Stuart.

Newfield (Pineland Prairie) Major Master Final Site Plan – On December 15, 2020, the Board of County Commissioners approved a request for master site plan approval for the Crossroads Neighborhood, Phase 1 of the Newfield development. The Crossroads Neighborhood comprises approximately 139.5 acres and is located east of and adjacent to SW Citrus Boulevard about 1.5 miles west of SW Boat Ramp Road in Palm City. Newfield is a planned community to be developed on an approximate 3,411-acre parcel of land located west of and adjacent to the Florida turnpike, north of SW Martin Highway (State Road 714) and south of and adjacent to the C-23 Canal, which acts as the border with St. Lucie County. The future land use designation for the Newfield development is Mixed-Use Village (MUV), which is specific to the development. The Planned Mixed-Use Village (PMUV) zoning district classification is also unique to Newfield.

Palm City Ga Homes (Palm Bluff Townhomes) PUD Final Site Plan – On June 16, 2020, the Board of County Commissioners approved a request by Palm City GA Homes, LLC for a PUD Zoning Agreement and master/final site plan for a residential, 28-unit townhome development within 14 two-story buildings. The project also includes a community pool, supporting infrastructure, and upland preserve on approximately 3.57 acres, and the project would achieve a gross residential density of 7.8 units per acre if carried out as planned. The site consists of two parcels and is located at 2810 SW Martin Hwy, specifically on the south side of SW Martin Hwy approximately 1,500 feet east of SW High Meadow in Palm City. The project site has a land use designation of Medium Density Residential and a zoning of RM-8, Medium Density Residential District.

Pentalago Rev Maj Master & Ph 1 Final – On August 14, 2018, the Board of County Commissioners approved a request for a Revised Major Master and Ph 1 Final Site Plan on 212.1 acres. Phase 1 consists of 26 lots and the associated infrastructure. The project, in total, consists of 42 five-acre lots and originally received master/final site plan approval on January 20, 2009. The final site plan was rescinded on June 16, 2009, but the master site plan has been kept valid. The site is located on the east side of Citrus Boulevard, north of and adjacent to I-95. The Future Land Use Designation on the property is Agricultural Ranchette and the zoning district designation is AR-5A.

Pulte PUD At Christ Fellowship PUD Zoning and Master Site Plan – On April 27, 2021, the Board of County Commissioners approved a request by Christ Fellowship Church for a zoning district change from the current RE-2A, Rural Estate District to the Planned Unit Development (PUD) District through the Highpointe PUD Zoning Agreement, including a master site plan and phasing plan with a Deferral of Public Facilities Reservation. The project comprises of a 313-unit single family subdivision, including amenities, a sales center, and a non-profit campground. The 20-acre site will be incorporated into the master plan of the existing church development for the Christ Fellowship, which is a 321-acre property. The site is located at 10205 Pratt Whitney Road in Hobe Sound, adjacent to the Florida Turnpike and approximately 1 mile east of SW Kanner Highway in Stuart.

Rio Marine Village Revised Master Site Plan – On February 1, 2022, the Board of County Commissioners approved a request for a revised master site approval for a mixed-use waterfront village. The project includes 198 residential units, two restaurants housed in two buildings, marine and retail buildings, refurbished boat basins and marinas, and the associated infrastructure. The site is approximately 15.46 acres in size and is located on the south side of NE Dixie Highway about one-half mile east of NE Savannah Road in the Rio CRA. A master plan for the eastern portion of the project was approved on June 12, 2018. The project is in the Rio Redevelopment Zoning District. There are two future land use designations on the site: Commercial Waterfront and CRA Center.

Sabal Point (Jensen Dunes) Major Master/final Site Plan – On March 23, 2021, the Board of County Commissioners approved a request by Constance Haire and Anthony and Vanessa Palma for a final site plan proposing a residential subdivision. The project consists of 68 single-family lots with associated infrastructure and preserve areas, for a gross residential density of 2.31 units per acre. The site is 30.26 acres in size and is located approximately 2,500 feet east of NE Savannah Road at the end of the NE Cedar Street right-of-way in Jensen Beach. The property has a zoning designation of R-2, Single-Family Residential District and a future land use designation of Low Density allowing up to 5 units per acre.

Showcase PUD (Cove Salerno) Ph1 PUD Final Site Plan – On December 7, 2021, the Board of County Commissioners approved a request for the First Amendment to the Showcase Planned Unit Development (PUD) Zoning Agreement. This amendment included a revised master site plan and phasing plan and approval of the phase one final site plan. Phase One includes 79 single family homes and the associated infrastructure on approximately 35 acres of the 47-acre project. The Showcase PUD is located between SE Salerno Road and SE Cove Road approximately a quarter mile east of SW Kanner Highway. The project received master site plan approval on July 14, 2020, for 167 single family and townhome units. The property has a future land use designation of Low Density Residential allowing up to 5 residential units per acre and Planned Unit Development (PUD) zoning.

The Altis Minor Final Site Plan-Mixed Use Residential – A request was approved for a minor site plan for a mixed-use development consisting of 4 residential units and 4,930 square feet of office space in two buildings. The parcel is 0.29 acres in size and located on the west side of SE Dixie Highway in Hobe Sound. The property is in the A1A Corridor Zoning overlay and the Hobe Sound CRA.

The Oaks (Mapp Road Parcel) Minor Final Site Plan – A request by Team Parks was approved for development of a minor final site plan. The development includes a 24-lot single-family subdivision with associated infrastructure on about 11.59 acres, thus resulting in a gross residential density of 2.07 units per acre. The project site is located at 2051 Mapp Road in Palm City, on the northeast corner of the intersection of SW Mapp Road and SW Mooring Drive. The subject site is zoned R-1A, Single-Family Residential District, with a Low-Density future land use designation allowing 5 units per acre.

The Preserve at Rio Marine Village Major Master Site Plan – On September 13, 2022, the Board of County Commissioners approved a request by Rio North Dixie LLC for major master plan approval for the Preserve at Rio Marine Village. The proposed development includes 145 residential townhome and live-work units, as well as the associated infrastructure. The property is on a parcel of approximately 14.34 acres in size, and it is located on the north side of NE Dixie Highway approximately 300 feet west of NE Martin Avenue in Rio. The project is located within the Rio Community Redevelopment Area (CRA). The parcel has a CRA Center future land use and CRA Zoning designation with Core subdistrict assigned along NE Dixie Highway and General subdistrict within the rest of the project. The parcel fronts onto primary designated roadways, NE Dixie Highway and NE Martin Avenue.

The Reserve at Jensen Beach (Savannah Apartments) Revised Major Master And Final Site Plan – On August 11, 2020, the Board of County Commissioners approved a request by Jensen CAP Investments, LLC for revised master and final site plan approval for a major residential development. The project includes 197 multi-family units in nine 3-story buildings and associated infrastructure, including a clubhouse/pool amenity on approximately 23 acres, thus achieving a gross residential density of 8.56 units per acre. The site consists of 3 parcels located on the east side of NE Savannah Rd between NE Business Park PI and NE Coy Senda in Jensen Beach. The project has a split future land use designation and corresponding split zoning classification. The two parcels with frontage on NE Savannah Road have a Commercial Office/Residential (COR) future land use designation and have a Commercial Office/Residential (COR-2) zoning classification. The rear parcel that abuts the FEC railway right-of-way has a Medium Density Residential future land use designation and has a Medium Density Residential District, RM-8 zoning classification.

Tradewinds Of Hobe Sound Major Final Site Plan – On March 9, 2021, the Board of County Commissioners approved a request by Laurel Lane Holdings, LLC for the development of a 177-unit apartment complex and the associated infrastructure. The project includes workforce/affordable housing and a new access to SE Federal Highway by opening a new right-of-way. The approximately 12.8-acre parcel is located on the east side of SE Federal Highway about a quarter mile north of SE Dharlys Street West. The zoning district designation for the property is RM-10, High Density Residential District, with a future land use designation of High Density. The proposed residential density for the development would be 13.81 units per acre.

Via Claudia PUD Zoning Master & Final Site Plan – On September 28, 2021, the Board of County Commissioners approved a request by D.R. Horton for approval of a rezoning to a Planned Unit Development (PUD) zoning district classification through The Preserve at Park Trace PUD Zoning Agreement. Also included in this request was a master/final site plan for the development of a 114-lot single

family subdivision and the associated infrastructure. The property is on a parcel that is approximately 97 acres in size and located on the south side of SE Cove Road at the SE Willoughby Boulevard intersection in Stuart. The existing future land use designation on the parcel is Estate Density, which allows for up to two units per acre. The existing zoning district designation is RE-1/2A, Residential Estate District. The resulting gross residential density would be 1.2 units per acre.

Willoughby Townhomes Major Final Site Plan – On April 19, 2022, the Board of County Commissioners approved a request by Meritage Homes of Florida for approval of a rezoning to a Planned Unit Development (PUD) and a PUD Zoning Agreement, including a Master Site Plan for the development of 117 townhomes and associated infrastructure. The project site is on a parcel of approximately 18.37 acres in size and located at the northeast corner of the intersection of SE Willoughby Boulevard and SE Salerno Road in Stuart. The site has a future land use designation of Commercial/Office/Residential and a split zoning of COR-1 and COR-2.

Willoughby Townhomes PUD Final Site Plan – On October 18, 2022, the Board of County Commissioners approved a request by Lucido & Associates on behalf of Meritage Homes of Florida for final site plan approval of the aforementioned Willoughby Townhomes project. More information on this development is listed above.

Approved (Under Construction) Project Descriptions

Bridgewater Preserve PUD Revised PUD Agreement Master and Final Site Plan – On September 27, 2022, the Board of County Commissioners approved the First Amendment to the Bridgewater Preserve PUD Agreement, which includes a revised master site plan, revised timetable of development, and revised special conditions. The common recreational facilities have been deleted, but the lot layout remains the same. The 215-acre development is located on the west side of SE Island Way in southern Martin County. Bridgewater Preserve received final site plan approval on February 2, 2006, for 36 residential 5 acre lots. On July 25, 2017, the Board of County Commissioners adopted CPA 17-3, a future land use amendment that changed the future land use designation from Agricultural Ranchette to Rural Density on the Bridgewater property. The Board also approved Resolution 17-7.22 changing the zoning district designation to RE-2A, Rural Estate District in conjunction with the land use. On March 26, 2019, the project received master site plan approval and approval for a PUD zoning agreement for 107 single family lots. Currently, three units have been constructed.

Bridgewater Preserve PUD Rezoning & Master – On February 26, 2019, the Board of County Commissioners approved a master site plan and Planned Unit Development (PUD) Zoning Agreement to increase the number of single family lots from 26 to 107 in the existing Bridgewater Preserve residential subdivision. The approximate 215-acre parcel is located on the west side of SE Island Way adjacent to the Palm Beach County line in southern Martin County. On July 25, 2017, the Board of County Commissioners adopted CPA 17-3, a future land use amendment that changed the future land use designation on the property from Agricultural Ranchette to Rural Density. The Board also approved Resolution 17-7.22 changing the zoning district designation to RE-2A, Rural Estate District in conjunction with the land use. Currently, three units have been constructed.

Floridian Golf Club PUD Phase 4 Administrative Amendment – The Board of County Commissioners recently approved a request for an administrative amendment to the Floridian PUD agreement to allow for a

certificate of occupancy phasing plan for Phase 4 of the PUD master site plan. The project is located adjacent to the St. Lucie River and accessed from SW Murphy Road in Palm City. More on this project is described below.

Floridian Golf Club PUD, 6th PUD Amendment Phase 3 & 4 – On May 3, 2022, the Board of County Commissioners approved the Sixth Amendment to the Floridian Golf Club PUD Zoning Agreement, including a revised phasing plan, and revised Phase 3 and Phase 4 final site plans. The Floridian Golf Club is located on SW Murphy Road in Palm City and straddles the Martin and St. Lucie County line. The approximately 122-acre site in Martin County includes an 18-hole golf course, club facilities, 36 residential units, and associated infrastructure. The Floridian Golf Club PUD Zoning Agreement and master site plan were originally approved in 2012. The project consists of six phases with most of the infrastructure and amenities in place.

Projects Currently Under Review

Glades Crossing Minor Final Site Plan – This was a request for approval of a Revised Minor Final Site Plan for 10 single family homes on 14 areas located east of S Kanner Highway and south of SE Pomeroy Street. This request has since been withdrawn.

Hobe Lakes Estates Minor Final Site Plan – This was a request by BR 24 LLC for approval of a final site plan for a 12-lot single family subdivision. The approximate 60-acre undeveloped site is located on the south side of Bridge Road approximately 3,500 feet west of SE Powerline Ave in Hobe Sound. This request has since been withdrawn.

I-95 Riverside PUD 9th Amend Rev Master and Ph Iv Final Site Plan – This was a request by Pulte Home Company, LLC for approval of a 9th Amendment to the I-95 Riverside PUD and master plan along with a Phase IV final site plan to allow for the construction of 98 townhomes on a 12.33-acre site. The I-95 Riverside PUD is located on the north side of SW Kanner Highway / SR 76, just east of the I-95 interchange in Stuart.

Jupiter Bay Holdings Multi-Family Minor Final Site Plan – This was a request for approval of a minor site plan consisting of a 14-unit multi-family project on an approximate 0.92-acre parcel, which is located on the east side of SE Federal Highway about 200 feet south of SE Hobe Terrace in Hobe Sound. This request is currently under a final review.

Jupiter Narrows PUD Revised PUD Zoning Master and Final Site Plan – This was a request by Jupiter Narrows Property Owners Association for approval of the Fourth Amendment to the Jupiter Narrows PUD Zoning Agreement and a Revised Master/Final Site Plan and Preserve Area Management Plan. Proposed is the addition of a residential multi-slip docking facility for the use of existing residents, consisting of 28 wet slips, kayak launch area, a fishing pier, and associated access pier/dockage to the existing Jupiter Narrows PUD residential development located on the east side of SE Gomez Avenue at SE Jupiter Narrows Place in Hobe Sound.

Loggerhead Estates II Minor Final Site Plan – This was a request by Medalist Building Group, LLC for approval of a Minor Final Site Plan for 23 residential lots on 4.54 acres on SW 34th Street, about 800 feet west of SW Mapp Road, in the Old Palm City CRA. The total parcel size is 5.92 acres. The Cross Church on site will remain on 1.38 acres. This request requires resubmittal.

Martin Hwy Multi-Family Major Final Site Plan – This was a request by WGI on behalf of JAMSZ Properties for approval of a major final site plan consisting of a 90-unit multi-family residential development. The project would be built on an approximate 6.09-acre site located on the northwest corner of SW Palm City School Avenue and SW Martin Highway in Palm City. The site is located in the Corridor Subdistrict of the Old Palm City CRA. This request requires resubmittal.

Paddock Palm City PUD Major Master Final Site Plan – This was a request by HJA Design Studio, LLC on behalf of Finland Capital, LLC for approval of a rezoning from RM-8 Medium Density Residential District to a Planned Unit Development (PUD) District, including a PUD Development Agreement and a Master/Final Site Plan for the construction of 53 townhomes, 6 duplex units, and 1 detached single-family dwelling along with associated infrastructure. The site is approximately 8.29 acres and is located on the southeast corner of SW Martin Highway and SW 30th Avenue in Palm City. This request requires resubmittal.

Pentalago Ph 2 Minor Final Site Plan – This was a request by HJA Design Studio, LLC on behalf of Tight-Line Lakes LLC for approval of a Phase II Final Site Plan for the 42-lot Pentalago development. This project previously received approval for a master site plan and a Phase I final site plan, which contains 26 lots. Phase II is the final phase, containing the remaining 16 lots. The site is located north of I-95, east of Citrus Boulevard in western Palm City.

Pepperwood Assemblage PUD Zoning Master & Final Site Plan – This was a request by JAMSZ Properties for approval of a PUD agreement Master Final site plan to develop 43 detached single-family lots. The site is approximately 29.23-acres and consists of three undeveloped parcels located between SE Cove Road and SE Salerno Road, west of Legacy Cove and south of Fern Creek.

Port Cove PUD – This was a request by Oksjn Jensen Beach LLC for approval of PUD Zoning through a Planned Unit Development Zoning Agreement. The development includes a Master/Final Site Plan approval for the construction of 29 townhome units on an undeveloped parcel that is approximately 4.85 acres in size. The site is located on the south side of NE Dixie Highway approximately half-a-mile west of the NE Palmer Street Roundabout. This request is currently under a final review.

Pulte Aquarius PUD – This was a request by HJA Design Studio, LLC on behalf of Pulte Home Company, LLC for approval of a rezoning from COR-2 to a Planned Unit Development (PUD), along with a PUD zoning agreement and Master/Final Site plan. The development consists of 272 townhomes and associated infrastructure. The site is approximately 35.3 acres and is located at 6325 SE Community Drive in Stuart. This request requires resubmittal.

Riverside Major Master Site Plan – This was a request by New Urban Towns, LLC on behalf of Riverside Major Master Site Plan for approval of a mixed-use development consisting of up to 95 multi-family dwelling units and up to 10,710 square feet of commercial and restaurant use. The site is approximately 7.73 acres in size and is located in the Jensen Beach Community Redevelopment Area (CRA). The property is adjacent to NE Indian River Dr, north of NE Church Street, east of Pineapple Ave., and the Indian River Lagoon, as well as a marina.

Sand Pine Ridge Minor Final Site Plan – This was a request by Cotleur & Hearing on behalf of Core 4 Homes for minor site plan approval for the development of 56 residential apartment units and the associated infrastructure. The property is approximately 4.27 acres in size and is located in the General Subdistrict of

the Hobe Sound CRA. The undeveloped site is on the NW corner of SE Porter Boulevard and SE Dixie Highway in Hobe Sound.

Showcase PUD Ph II – This was a request by Design and Entitlement Consultants, LLC. on behalf of Tamarack Land – Salerno Reserve, LLC. for approval of the Showcase PUD Phase II final site plan. The proposed development consists of 88 two-story townhomes and associated infrastructure on approximately 10.52 of the total 47.12 acres approved for the Showcase PUD Revised Master Site Plan in November 2021. The site is located at 371 SE Cove Road in Stuart.

Solana PUD (Armellini Ave) PUD Rezoning And Final Site Plan – This was a request for approval of PUD zoning and Master/Final site plan for the development of 98 townhomes on approximately 11.2 acres of undeveloped property. The site is located between the Florida turnpike and SW Armellini Avenue, approximately a quarter mile north of SW Martin Highway in Palm City. This request has since been withdrawn. This request is currently under a final review.

Sunset Trail Estates – This was a request for approval of a minor master site plan for the development of 28 residential lots and associated infrastructure. The site is approximately 11.7 acres in size and located on the north side of Sunset Trail, approximately 600 feet west of SW Mapp Road in Palm City.

The Cove at Hobe Sound Minor Final Site Plan – This was a request by McCarty & Associates on behalf of Core 4 Hobe Sound LLC for approval of a minor final site plan to develop 38 townhomes and associated infrastructure, including an internal roadway and alley. The approximately 4.88-acre undeveloped site is located in the multifamily subdistrict of the Hobe Sound CRA on SE Rohl Way, about 150 feet west of SE Dixie Highway.

The Cove Minor Final Site Plan – This was a request by Marcela Cambor & Associates on behalf of Dismantle Repair Holdings, LLC. for approval of a minor final site plan. The proposed development consists of 48 multi-family units and associated infrastructure within four three-story apartment buildings. The property is on a 2.31-acre parcel of undeveloped land located between SE Cove Road and SE Lee Street, west of SE Jack Avenue within the Port Salerno CRA. This request requires resubmittal.

The Martin Apartments Minor Final Site Plan – This was a request by RBM Mapp LLC for the development of a 24-unit multi-family development on an undeveloped 1.23-acre parcel. The site is located within the Old Palm City CRA in the Core subdistrict, east of SW Mapp Road, north of SW 27th Street, and south of SW 28th Street. This request requires resubmittal.

The Preserve at Salerno PUD Zoning Master Final Site Plan – This was a request by Cuozzo Design Group on behalf of Rare Capital Partners LLC for approval of a zoning change from RM-10, High Density Residential District to Planned Unit Development (PUD), as well as a concurrent master/final site plan to develop 79 townhouse units. The residential component is located on an approximate 8.8-acre undeveloped parcel east of SE Federal Highway at the terminus of SE Hydrangea Street.

West Jensen PUD 14th PUD Amendment Phase 1b Master and Final Site Plan – This was a request by Lucido & Associates on behalf of Jensen Beach Land Company for approval of the 14th amendment to the West Jensen PUD, including a revised Phase 1B Master and parcel 6.4 (previously parcels 6.1-6.5) final site plan. The latter includes the development of 169 residential units and the associated infrastructure on an undeveloped site about 26 acres in size. The site is located on the southeast corner of SE Federal Highway and NW Goldenrod Road. This request is currently under a final review.

APPENDIX C: POPULATION AND HOUSEHOLD PROJECTIONS

Martin County's CGMP stipulates in Policy 4.1D.2 that the County must annually produce a Population Technical Bulletin, which is used for planning purposes such as projecting the future needs for housing and public facilities. The Population Technical Bulletin utilizes data from the U.S. Census and the University of Florida Bureau of Economic and Business Research (BEBR) for the State of Florida Office of Economic and Demographic Research (EDR) for population estimates and projections. BEBR medium permanent estimates and projections are used to generate population data for the County itself, its respective municipalities, and for the unincorporated area.

The most recent Population Technical Bulletin, however, was published in 2017. This precludes the replication of certain portions of the 2018 analysis, as not all the data and sources used in the Population Technical Bulletin are available. To reconcile these gaps and deficiencies, datasets and methodologies were developed in an effort to mirror those last used in the 2017 Population Technical Bulletin (hitherto referred to as the "2017 Bulletin"). Below is a detailed outline of the steps taken for the various calculations needed to conduct the relevant analyses.

Preliminary Population Data Collection

We collected this data from the U.S. Census, the American Community Survey (ACS), and BEBR. We also collected BEBR's medium permanent estimates of population projections for Martin County for 2023 to 2045. To generate estimates for each of the County's municipalities, capture-based methods were utilized.

Table C1 displays total population estimates that we collected for Martin County and its respective jurisdictions.

Table C1. Historical Population in Martin County (2010-2022)

	INDIANTOWN ⁽¹⁾	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
2010 ⁽²⁾	-	817	355	1,996	15,593	127,557	146,318
2011	-	504	392	1,882	15,644	128,311	146,733
2012	-	523	332	1,906	15,653	128,840	147,254
2013	-	816	301	2,013	15,814	129,133	148,077
2014	-	816	95	1,998	15,972	129,704	148,585
2015	-	810	95	2,000	16,110	131,047	150,062
2016	-	812	100	2,026	16,148	131,784	150,870
2017	-	809	134	2,044	16,183	133,852	153,022
2018	6,707	826	163	2,078	16,425	129,357	155,556
2019	6,728	829	303	2,090	16,504	132,144	158,598
2020 ⁽²⁾	6,560	804	301	1,991	17,425	131,350	158,431
2021	6,633	879	292	1,984	17,269	131,996	159,053
2022 ⁽³⁾	6,679	884	287	1,983	17,417	132,913	160,163

Sources: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2011-2022; GAI Consultants. Note: (1) Indiantown was incorporated on December 31, 2017. (2) Reflects data from the Decennial Census. (3) 2022 Reflects estimates.

Historical Population Growth Trends

Total population in Martin County has grown at a Compound Annual Growth Rate (CAGR) of 0.70% since 2010. The largest shares of that growth have taken place in Stuart and in Unincorporated Martin County, which together have combined for over 90% of the change in the County's population in 2021 and 2022. While the County overall has experienced growth, however, population has slightly decreased in Indiantown and Jupiter Island but remained relatively constant in Sewall's Point.

Martin County's population growth compared to that of its surrounding counties is also informative, and this information is displayed in **Table C2**. Palm Beach County, which is the largest of all counties observed, grew at a CAGR of 1.06% over the past 13 years. St. Lucie County grew at the most rapid rate with a CAGR

of 1.79% over the same period. Okeechobee County, which is the smallest of the group, grew at a CAGR of 0.26% since 2010. Once again, Martin County's population grew at a CAGR of 0.70%, which is obviously a slower rate than those of Palm Beach and St. Lucie Counties but a faster rate than that of Okeechobee.

Table C2. Historical Population in Surrounding Counties (2010-2022)

	MARTIN COUNTY	PALM BEACH COUNTY	ST. LUCIE COUNTY	OKEECHOBEE COUNTY
2010	146,318	1,320,134	277,789	39,996
2011	146,733	1,309,401	274,693	39,978
2012	147,254	1,324,085	278,246	39,779
2013	148,077	1,339,221	281,015	39,642
2014	148,585	1,359,074	283,988	39,398
2015	150,062	1,378,806	288,006	39,255
2016	150,870	1,398,757	293,136	39,420
2017	153,022	1,426,772	298,763	40,228
2018	155,556	1,446,277	305,591	40,572
2019	158,598	1,465,027	312,947	41,144
2020	158,431	1,492,191	329,226	39,644
2021	159,053	1,497,987	343,579	41,254
2022 ⁽¹⁾	160,163	1,513,848	349,719	41,361

Sources: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2011-2022; GAI Consultants. Note: (1) 2022 Reflect estimates.

Population Projections

To calculate our population projection estimates, we began by collecting BEBR's medium permanent estimates of population projections for Martin County between 2023 and 2045. To generate estimates for each of the County's municipalities, we took an average of two projections that both utilized capture-based methods. The first capture-based method used the average capture of the overall County population over the course of the period for which we collected total population counts (i.e., 2010-2021, with estimates calculated for 2022). We applied this average capture of each municipality's population to the BEBR medium permanent estimates of population projections for Martin County overall to generate population projection estimates for each municipality.

The second capture-based method involved finding the change in total population counts for the County and each municipality between 2010 and 2022, calculating each jurisdiction's capture of the County's population change for each of those years, finding the average capture of change for each municipality over the past ten years, and then applying that average capture of change to the overall change in population as projected by BEBR from 2023 to 2045. For example, BEBR projected Martin County's total population to increase from 161,176 in 2023 to 162,725 in 2024, so the overall change in population for 2024 was 1,549. Ocean Breeze was estimated to capture 0.3% of the change in Martin County's overall population over the past ten years, so to estimate a projection for Ocean Breeze's change in population between 2023 and 2024, we multiply 0.3% by 1,549 to derive a change in population of 4. Once we obtained similar estimates for all applicable jurisdiction-year combinations, we then added the projected future year-by-year change in population to each jurisdiction's most recent population estimate. For example, Indiantown's 2022 total population count estimate was 6,679. Using the aforementioned method, we projected Indiantown's change in population between 2022 and 2023 to equal 56. Thus, we add 56 to our 2022 estimate of 6,679 to derive a 2023 population projection of 6,735 for Indiantown.

Finally, as mentioned before, we averaged these two capture-based projections to derive our final population projection estimates for each jurisdiction. From this point forward, we will refer to these final population projection estimates as "our projections". We display our final population projection estimates in **Table C3**.

Table C3. Population Projections Martin County (2023-2036)

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
2023	6,758	898	282	2,032	17,397	133,808	161,176
2024	6,833	943	285	2,057	17,533	135,073	162,725
2025	6,910	988	288	2,082	17,671	136,351	164,290
2026	6,977	1,028	291	2,104	17,792	137,476	165,668
2027	7,034	1,062	294	2,123	17,896	138,438	166,847
2028	7,085	1,091	296	2,140	17,987	139,282	167,881
2029	7,130	1,119	298	2,155	18,070	140,053	168,825
2030	7,175	1,145	300	2,170	18,149	140,793	169,731
2031	7,219	1,171	302	2,184	18,230	141,538	170,644
2032	7,264	1,197	304	2,199	18,310	142,287	171,561
2033	7,308	1,223	306	2,214	18,390	143,026	172,467
2034	7,351	1,249	308	2,228	18,468	143,755	173,359
2035	7,393	1,274	310	2,242	18,544	144,462	174,226
2036	7,434	1,298	311	2,255	18,617	145,139	175,055

Sources: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2011-2022; GAI Consultants.

The County's overall population is expected to grow by 3.4% in the 5-year period of 2022 to 2026, 6.5% in the 10-year period of 2022-2031, and 9.3% in the 15-year period of 2022-2036. If we focus on the two largest concentrations of both population and growth, we can project that Stuart will grow by 2.2% in the 5-year period, 4.7% in the 10-year period, and 6.9% in the 15-year period. Unincorporated Martin County is predicted to grow by 3.4% in the 5-year period, 6.5% in the 10-year period, and 9.2% in the 15-year period. Over the same 15-year period, Stuart is expected to grow at a CAGR of 0.45%, Unincorporated Martin County is expected to grow at a CAGR of 0.59%, and the County overall is expected to also grow at a CAGR of 0.59%. Clearly, Unincorporated Martin County projects to continue representing the highest share of both population and growth of all areas within the County as a whole.

Household Projections

Multiplying our 2022 household estimates by our calculations of the 12-year CAGR for Martin County and each of its jurisdictions, we calculated a projection for the number of households in 2023 for Martin County and each of its jurisdictions. We then multiplied our 2023 projections by the same 12-year CAGR to obtain projections for 2024 and continued this process until we calculated projections through 2036. Our results are displayed in **Table C4**. For the County as a whole, we project that the overall household count will grow by 3.7% in the 5-year period of 2022 to 2026, 8.6% in the 10-year period of 2022-2031, and 13.7% in the 15-year period of 2022-2036. If we focus on only the two largest concentrations of both population and growth within the County, we can project that Stuart will grow by 0.6% in the 5-year period, 5.4% in the 10-year period, and 10.3% in the 15-year period. Unincorporated Martin County is predicted to grow by 4.4% in the 5-year period, 9.3% in the 10-year period, and 14.5% in the 15-year period. Over the same 15-year period, Stuart is expected to grow at a CAGR of 0.66%, Unincorporated Martin County is expected to grow at a CAGR of 0.90%, and the County overall is expected to also grow at a CAGR of 0.86%. Clearly, Unincorporated Martin County projects to continue representing the highest share of households across all areas within the County.

Table C4. Household Projections in Martin County (2023-2036)

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
2023	1,926	348	138	926	7,662	56,334	67,335
2024	1,944	351	139	935	7,733	56,854	67,957
2025	1,962	355	140	943	7,805	57,380	68,584
2026	1,980	358	142	952	7,877	57,909	69,218
2027	1,998	361	143	961	7,949	58,444	69,857
2028	2,017	365	144	970	8,023	58,984	70,502
2029	2,035	368	146	979	8,097	59,529	71,153
2030	2,054	371	147	988	8,172	60,079	71,810
2031	2,073	375	148	997	8,247	60,633	72,474
2032	2,092	378	150	1,006	8,323	61,193	73,143
2033	2,112	382	151	1,015	8,400	61,759	73,818
2034	2,131	385	152	1,025	8,478	62,329	74,500
2035	2,151	389	154	1,034	8,556	62,905	75,188
2036	2,171	392	155	1,044	8,635	63,486	75,883

Sources: U.S. Census Bureau and University of Florida, Bureau of Economic and Business Research, 2011-2022; GAI Consultants.

APPENDIX D: EMPLOYMENT TRENDS

Historical Employment Growth Trends

Table D1 displays total employment data sourced from the Longitudinal Employer-Household Dynamics (LEHD) program which is part of the Center for Economic Studies at the U.S. Census Bureau. Total employment in Martin County has grown at a CAGR of 3.5% between 2010 and 2019. As with population, the largest shares of that growth have taken place in Stuart and in Unincorporated Martin County, with Jupiter Island experiencing a slight decline in total employment over the same period. Comparatively, Ocean Breeze has seen significant growth in employment from 2010 to 2019, with a CAGR of 20.4%. Sewall's Point's employment has remained relatively constant, which similarly corresponds to its population trends.

Table D1. Historical Employment in Martin County (2010-2019)

	INDIANTOWN	JUPITER ISLAND	OCEAN BREEZE	SEWALL'S POINT	STUART	UNINCORPORATED	TOTAL COUNTY
2010	-	574	49	431	22,875	27,658	51,587
2011	-	548	120	437	24,705	29,729	55,539
2012	-	545	85	406	23,831	29,563	54,430
2013	-	550	91	377	23,697	30,467	55,182
2014	-	542	100	387	24,664	32,638	58,331
2015	-	617	144	390	26,445	34,536	62,132
2016	-	497	188	521	28,215	37,159	66,580
2017	-	520	168	512	28,338	36,290	66,749
2018	928	529	195	458	28,998	39,149	70,257
2019	907	521	313	459	29,160	41,202	72,562

Source: Longitude Employment Statistics OnTheMap Application; GAI Consultants.

Inflow/outflow data is displayed in **Table D2**, revealing that the share of people employed in the County but living elsewhere has increased at a CAGR of 4.5% between 2010 and 2019, with 65.1% of people employed in Martin County living outside the County itself as of 2019. The share of people living in Martin County but employed outside the County has grown at a CAGR of 1.7% since 2010. The number of people living and employed within the County has also increased at a CAGR of 1.8%; this is a notable since it is a higher rate of growth than people who live in the County but are employed outside of the County itself.

Table D2. Inflow and Outflow in Martin County (2010-2019)

	LIVING IN COUNTY, EMPLOYED ELSEWHERE	EMPLOYED IN COUNTY, LIVE ELSEWHERE	LIVING AND EMPLOYED IN COUNTY	% OF COUNTY'S EMPLOYEES LIVING ELSEWHERE
2010	30,375	30,287	21,301	58.7%
2011	29,987	33,749	21,790	60.8%
2012	30,234	32,782	21,648	60.2%
2013	31,637	32,978	22,204	59.8%
2014	32,821	35,534	22,795	60.9%
2015	32,723	38,050	24,080	61.2%
2016	34,360	41,714	24,865	62.7%
2017	36,220	42,331	24,415	63.4%
2018	36,080	44,880	25,371	63.9%
2019	36,067	47,213	25,347	65.1%

Source: Longitude Employment Statistics OnTheMap Application; GAI Consultants.

The inflow/outflow data for Martin County reveals trends regarding the relationship between employment and population growth on one hand and housing supply on the other. The number of people living and employed within Martin County has not grown nearly as much as the number of people employed in the County but living elsewhere, which is an important consideration when calculating housing demand.

Comparing Martin County's employment growth to that of its surrounding counties, **Table D3** below illustrates that Palm Beach County grew at a CAGR of 2.5% over the 10 years from 2010–2019. Similarly, St. Lucie grew at a CAGR of 2.6%, while Okeechobee declined at a CAGR of 0.4 %. Martin County, with a CAGR of 3.5%, grew at the highest rate of all neighboring counties.

Table D3. Historical Employment in Surrounding Counties (2010-2019)

	MARTIN COUNTY	PALM BEACH COUNTY	ST. LUCIE COUNTY	OKEECHOBEE COUNTY
2010	51,588	485,188	62,449	11,776
2011	55,539	518,196	68,032	10,059
2012	54,430	511,091	67,472	10,356
2013	55,182	530,840	67,686	10,091
2014	58,329	549,866	68,403	10,018
2015	62,130	576,637	71,715	10,762
2016	66,579	599,846	74,083	11,069
2017	66,746	607,959	75,179	12,084
2018	70,251	616,371	76,935	11,203
2019	72,560	624,031	80,381	11,337

Source: Longitude Employment Statistics OnTheMap Application; GAI Consultants.

As shown in **Table D4**, In Martin County, there were about 353 employees per thousand people in 2010 and 458 employees per thousand people in 2019. This indicates that over that 10-year period, Martin County experienced a CAGR of 2.64%. This figure is markedly higher than those of the surrounding counties (i.e., Palm Beach CAGR: 1.49%; St. Lucie CAGR: 1.34%; Okeechobee CAGR: -0.74%).

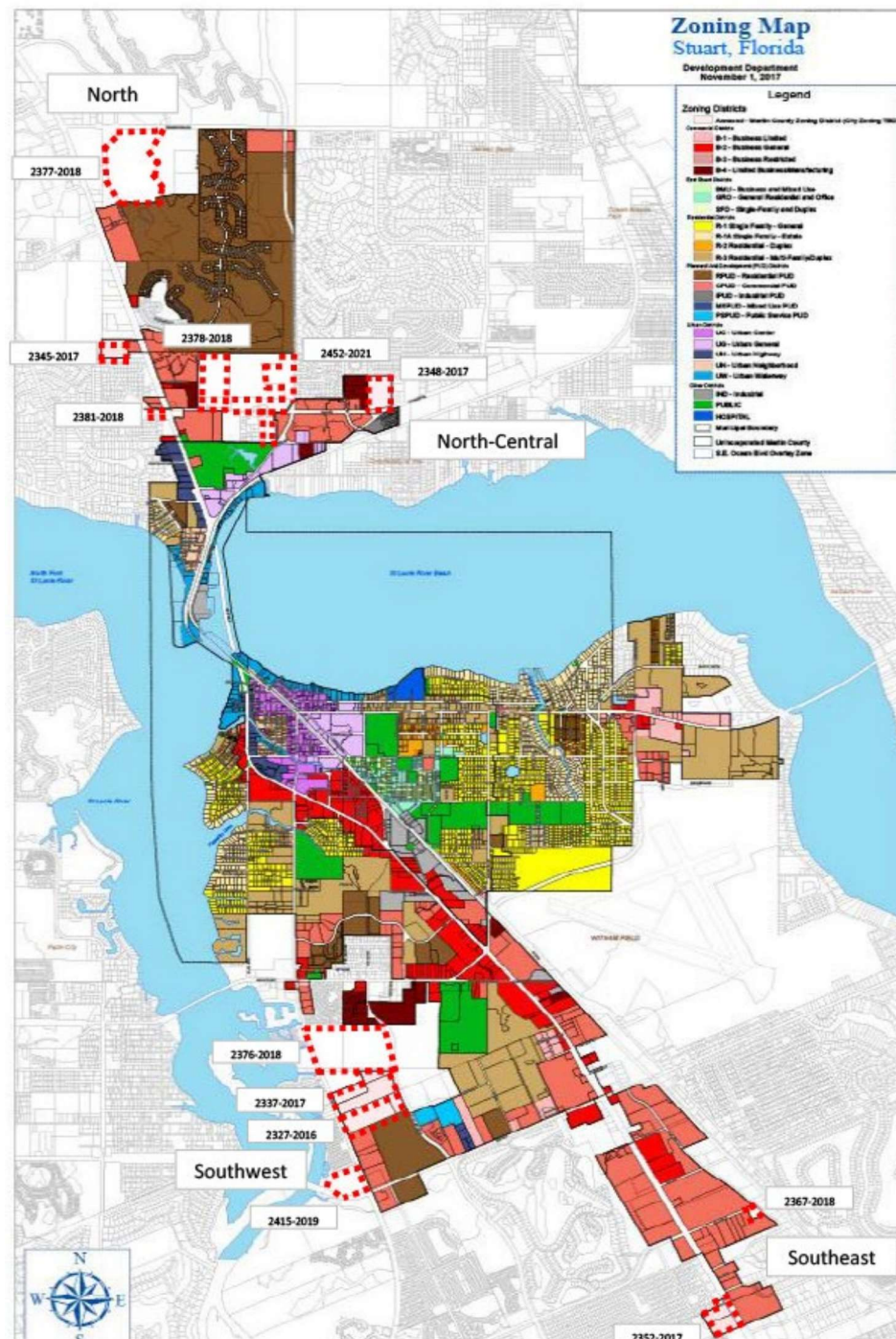
Table D4. Employment Per Thousand Population in Surrounding Counties (2010-2019)

	MARTIN COUNTY	PALM BEACH COUNTY	ST. LUCIE COUNTY	OKEECHOBEE COUNTY
2010	353	368	225	296
2011	379	396	248	254
2012	370	386	242	263
2013	373	396	241	257
2014	393	405	241	254
2015	414	418	249	268
2016	441	429	253	273
2017	436	426	252	294
2018	452	426	252	283
2019	458	426	257	275

Source: Longitude Employment Statistics OnTheMap Application; GAI Consultants.

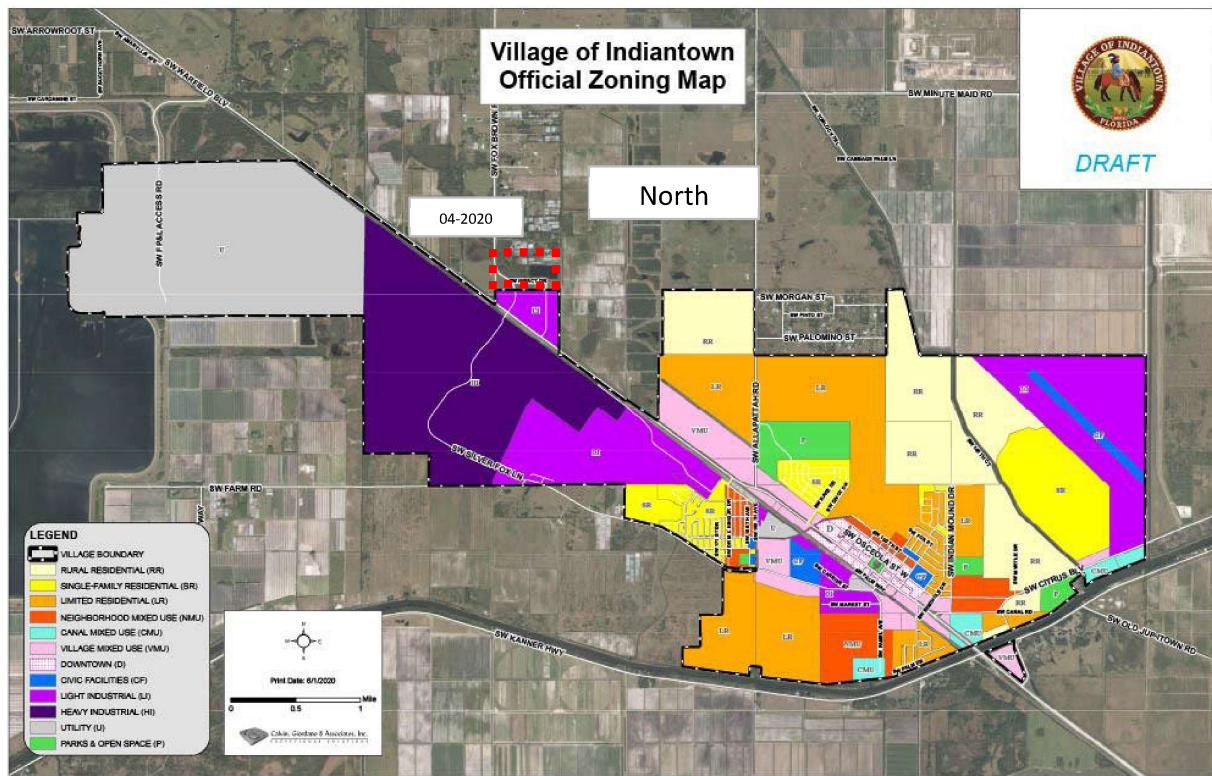
To further determine where concentrations of growth have been occurring more recently, **Figure 1** maps the location of all annexations have taken place across Martin County over the past 10 years. As shown in **Figure 1**, these annexations almost exclusively occurred in Stuart. **Figure 1** displays the 12 annexations that have occurred in Stuart over this period, and **Figure 2** displays Indiantown's only annexation since its incorporation in 2017.

Figure 1. Recent Annexations in Stuart, FL



Source: Martin County Zoning Map, Martin County Agenda Items database, GAI Consultants

Figure 2. Recent Annexations in Indiantown, FL



Source: Village of Indiantown Zoning Map, Martin County Agenda Items database, GAI Consultants

Looking closer at **Figure 1**, we can see that much of the annexation has occurred in the Southwest and North-Central regions that were formulated for the purposes of this exercise. Put more simply, annexations are mostly occurring around the edges of the northern and southern boundary limits of the City of Stuart. Each of Stuart's annexations are located within the PUSD. Indiantown's only annexation, displayed in **Figure 2**, was comprised of 57.72 acres and was on the North end of their municipal boundary, bordering the PUSD. **Table E1** details all annexations that have occurred in Martin County's incorporated places over the past 10 years.

Table E1. Annexations in Martin County

MUNICIPALITY	ORDINANCE NUMBER	ACRES
Stuart	2327-2016	24.37
Stuart	2337-2017	29.16
Stuart	2345-2017	9.45
Stuart	2348-2017	14.86
Stuart	2352-2017	13.57
Stuart	2367-2018	1.87
Stuart	2376-2018	65.23
Stuart	2377-2018	65.79
Stuart	2378-2018	26.61
Stuart	2381-2018	0.80
Stuart	2415-2019	15.79
Stuart	2452-2021	42.46
Indiantown	04-2020	57.72

Source: Martin County Agenda Items database; Martin County Property Appraiser; GAI Consultants.

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MARTIN COUNTY, FLORIDA

INTER-OFFICE MEMORANDUM

www.martin.fl.us

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TO: Jenna Knobbe
Senior Planner

DATE: August 16, 2024

FROM: Luke Lambert, AICP, PTP
Traffic Engineering Ad

SUBJECT: Comprehensive Management Plan
Proposed Amendment 21-12: Waterside

Traffic Engineering staff has received the proposed amendment to the Future Land Use Map designation from Agricultural to Low Density Residential on 396.81-acres, located south of SW 96th Street, between SW Kanner Highway (SR-76) and the St. Lucie Canal.

Staff finds that the proposed Future Land Use Map designation would result in a net increase of 1,003 peak hour trips. Staff finds that the proposed Future Land Use Map designation may negatively impact the level of service on SW Kanner Highway (SR-76) between SE Jack James Drive and SE Cove Road. This roadway segment is predicted to have peak hour directional volumes that will exceed their generalized service capacities at buildout year. The applicant has proposed to limit development at 1,050 units with Proposed Amendment 21-11: Waterside Text; staff finds that would result in a net increase of 536 peak hour trips.

RESPONSE: Agree

For the purpose of this proposed amendment, staff cannot provide a "positive evaluation", meaning there is not sufficient roadway capacity planned in the adopted long-range capital facility plans of the Comprehensive Growth Management Plan [Martin County, Fla., CGMP Policy 14.1C.5.(2)(e) (2013)]. Staff recommends language be added to this policy requiring capacity improvements to SW Kanner Highway (SR-76) between SE Jack James Drive and SE Cove Road in order to ensure the impacts of development mitigates for itself.

RESPONSE: The owner/developer shall plan and appropriately fund the development's proportionate share of the cost of capital improvements needed to address the impact of such development consistent with Policy 14.1B.2. This shall include a PUD Agreement and/or Development Agreement that addresses public facilities, infrastructure, and the timing of development. It is important to note that the MPO revenue projections for 2020-2045 (attached) substantially under-forecast impact fee revenue by inappropriately assuming only a 1% increase from 2020-2045. Yet, Martin County Ordinance No. 1230 substantially increased impact fee rates, which will become effective January 1, 2025 and increase each year thereafter through 2028. Based on projected residential and non-residential growth, it is reasonable to forecast an additional 30-40% increase, taking into account Ordinance No. 1230, which would generate an additional \$9MM-\$12MM in impact fee revenue for future road projects. The attached summary compares the impact fee rates in 2024 to the rates effective in 2028. Moreover, it is very likely that additional impact fee rate increases will occur between 2028 and 2045. In addition, except for one project, the MPO revenue projections do not include any projected revenue from developers' proportionate share contributions. All such contributions would generate a net increase in revenue equal to the differential between the proportionate share payment and the impact fee credit for each such development. The MPO revenue projections do not account for this funding source.

This evaluation shall not be used by the applicant, or their successors in title, in any way whatsoever as committing the County legally through the theory of equitable estoppel or any other legal theory, to approve any final development order for the project without a determination and reservation of roadway adequate capacity [Martin County, Fla., CGMP Policy 14.1C.5.(2)(c) (2013)].

RESPONSE: Agree

Staff will reevaluate the traffic impacts prior to the issuance of any development order associated with the property.

RESPONSE: Agree

LL:ll

MARTIN COUNTY, FLORIDA
INTER-OFFICE MEMORANDUM

TO: Clyde Dulin, AICP **DATE:** August 19, 2024
Comprehensive Plan Administrator

FROM: Leo Repetti, PE
Technical Services Administrator

SUBJECT: Comprehensive Plan Amendment 21-12 Waterside

After a review of the materials received March 25, 2024 the Utilities and Solid Waste Department have the following comments:

BACKGROUND:

Description: This is an application for a Comprehensive Growth Management Plan (CGMP) Future Land Use Map amendment (FLUM) from Agricultural to Low Density Residential on 396.81 acres.

A separate staff report (CPA 21-11) has been created to evaluate the text amendments that includes an expansion of the Primary Urban Service District (PUSD) to include the subject property and to convert the existing Freestanding Urban Service District immediately adjacent to the PUSD.

The application also includes amendments to Figure 4-2 Urban Service Districts to include the Freestanding Urban Service District and changes to Figures 11-1, Areas Currently Served by Regional Utilities and 11-2, Potential Service Areas.

Utilities: Martin County Utilities.

Project Coordinator: Jenna Knobbe – Senior Planner - Comprehensive Planning

COMMENTS:

Utilities Comments:

As this project is outside our current service boundary and master plan build out, Martin County Utilities will need to evaluate plant and infrastructure capacity in order to serve this project. In addition to customary capital facility charges, the developer may be required to offset impacts through providing well sites, wells, transmission mains, and / or treatment plant components. The scope and proportionate share of developer contribution will not be known until utility master plan updates and a plant expansion analysis have been completed.

RESPONSE: Agree. No additional information or analysis is required at this stage. The following language in the companion text amendment ensures compliance:

“(d) The owner/developer shall plan and appropriately fund public facilities consistent with Policy 14.1B.2, which requires that future developments pay the full cost of capital facilities needed to address the impacts of such development. This shall include a PUD Agreement and/or Development Agreement that addresses public facilities, infrastructure, and the timing of development.”

Wellfield/Groundwater Protection Comments:

If groundwater or surface water withdrawals are proposed for irrigation, then the applicant will be required to submit additional information at the development review stage and submit a South Florida Water Management District Water Use Permit and may be required to submit groundwater computer model.

RESPONSE: Agree. No additional information or analysis is required at this stage.

LR