

PROPOSED AMENDMENT TO THE MARTIN COUNTY COMPREHENSIVE GROWTH MANAGEMENT PLAN

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REQUEST NUMBER: CPA 21-11, Waterside Text

Report Issuance Date: August 25, 2025

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PUBLIC HEARINGS:

Local Planning Agency (LPA):	October 2, 2025
Board of County Commission Transmittal:	November 4, 2025
Board of County Commission Adoption:	TBD

APPLICANT REQUEST:

This is an application for a text amendment changing numerous policies and figures found in Chapter 1 Preamble, Chapter 2, Overall Goals and Definitions, 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).*
- Section 1.7.F

Chapter 2, Overall Goals and Definitions:

- Section 2.4, Definitions

Chapter 4, Future Land Use Element:

- Section 4.2A.(8), *Population and projected residential demand for housing units*
- Section 4.2A.(9), *Residential capacity determination*
- 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.6
- 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

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

STAFF RECOMMENDATION:

Staff recommends denial of the proposed text amendment for the reasons outlined in this report.

EXECUTIVE SUMMARY:

The applicant most recently resubmitted application materials dated June 19, 2025 for staff review, but this report will analyze all recent application materials to date. This report tries to differentiate between materials submitted on different dates for clarity purposes. The proposed changes in this text amendment application are organized in this report as stated below:

Section 1. Primary Urban Service District Boundary

1.A. Expansion of Primary Urban Service District Boundary – The proposed changes to Figures 4-2, 11-1 and 11-2 seek to expand the Primary Urban Service District (PUSD) to include approximately 396 acres where a concurrent Future Land Use Map (FLUM)

amendment is proposed and is the subject of a separate staff report (CPA 21-12, Waterside FLUM). The proposed changes to Figures 4-2, 11-1 and 11-2 will also expand the Primary Urban Service District to include 250 acres of industrial land currently within the adjacent Freestanding Urban Service District. The proposed expansion of the Primary Urban Service District will cover approximately 646 total acres and result in the elimination of the Freestanding Urban Service District. Please see page 9 of this staff report.

Both the future land use change proposed in CPA 21-12 and the industrial land in the Freestanding Urban Service District are shown in Figures 1 and 2 below. See the portions of Figures 1 and 2 identified as Waterside PUD (proposed residential) and the Freestanding Urban Service District (industrial).

1.B. Elimination of Freestanding Industrial Urban Service District – The proposed expansion of the Primary Urban Service District to encompass approximately 646 total acres would result in the elimination of the existing Freestanding Industrial Urban Service District. These 250 acres of industrial land currently receive urban services through its freestanding urban service district designation. The elimination of the Freestanding Industrial Urban Service District and reclassification of these 250 acres to become part of the Primary Urban Service District would not change the services currently available to the approximately 250 acres of land with an Industrial future land use designation. Policy 4.7A.3(9), Policy 4.7A.3.1(3), Policy 4.7A.14(9), and Policy 4.13A.10 are all proposed to be amended with the deletion of the same piece of text pertaining to the existing Freestanding Urban Service District for the 250 acres of Industrial land use. Please see page 11 of this staff report.

Section 2. Proposed Sub-Area Policies

The proposed changes to Policy 4.1B.2, Chapter 4, Future Land Use Element, in this text amendment application seek to add new sub-area policy restrictions for the proposed Low Density Residential property that is the subject of a separate Future Land Use Map amendment staff report, CPA 21-12 Waterside FLUM. The adjacent 250 acres of industrial land known within the Freestanding Urban Service District are the subject of an existing subsection, subsection (2), in this same Plan policy. Please see page 13 of this staff report.

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

Pursuant to Policy 4.7A.7 of the CGMP, during the consideration of any expansion, creation or contraction of these Primary Urban Service District 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 meet the eight criteria listed in this policy. The applicant is not requesting any amendments to the text of Policy 4.7A.7. However, since the applicant is requesting to expand the Primary Urban Service District, this policy and its criteria must be analyzed. Please see page 16 of this staff report.

Section 4. Amendments to Residential Capacity Analysis Methodology

The proposed changes to Section 1.7.A, Section 1.7.B, Section 1.7.C, Section 1.7.D, Section 2.4, Section 4.2A.(8), Section 4.2A.(9), Policy 4.1D.2, Policy 4.1D.3, Policy 4.1D.4, Policy 4.1D.5, and Policy 4.1D.6 seek to amend language in various chapters of the CGMP pertaining to residential capacity analysis methodology and the Population Technical Bulletin. Sections 1.7.E and 1.7.F. in Chapter 1, Preamble, are proposed to be renumbered for consistency with the deletion of Section 1.7.D, but there are no proposed text changes to these policies. These proposed amendments are organized in this staff report in the following subsections:

- **AMENDMENTS TO CHAPTER 2, OVERALL GOALS AND DEFINITIONS:** Section 2.4 – *Definitions*
- **POPULATION TECHNICAL BULLETIN:** Policy 4.1D.2, *Population technical bulletin*, and Section 1.7.A, *Population estimates*
- **RESIDENTIAL DEMAND CALCULATIONS:** Section 4.2A.(8); Policy 4.1D.3, *Future residential housing unit demand*; Section 1.7.B, *Housing unit demand projection*; and Policy 4.1D.4, *Distribution of housing unit demand*
- **RESIDENTIAL SUPPLY CALCULATIONS:** Section 4.2A.(9); Policy 4.1D.5, *Residential capacity analysis*; Section 1.7.C, *Residential capacity calculations*; and Policy 4.1D.6
- **PEAK AND WEIGHTED POPULATION:** 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)*

Section 4 can be found on page 22 of this staff report.

Figure 1. Existing Martin County FLUM with subject site (CPA 21-12) outlined in red.

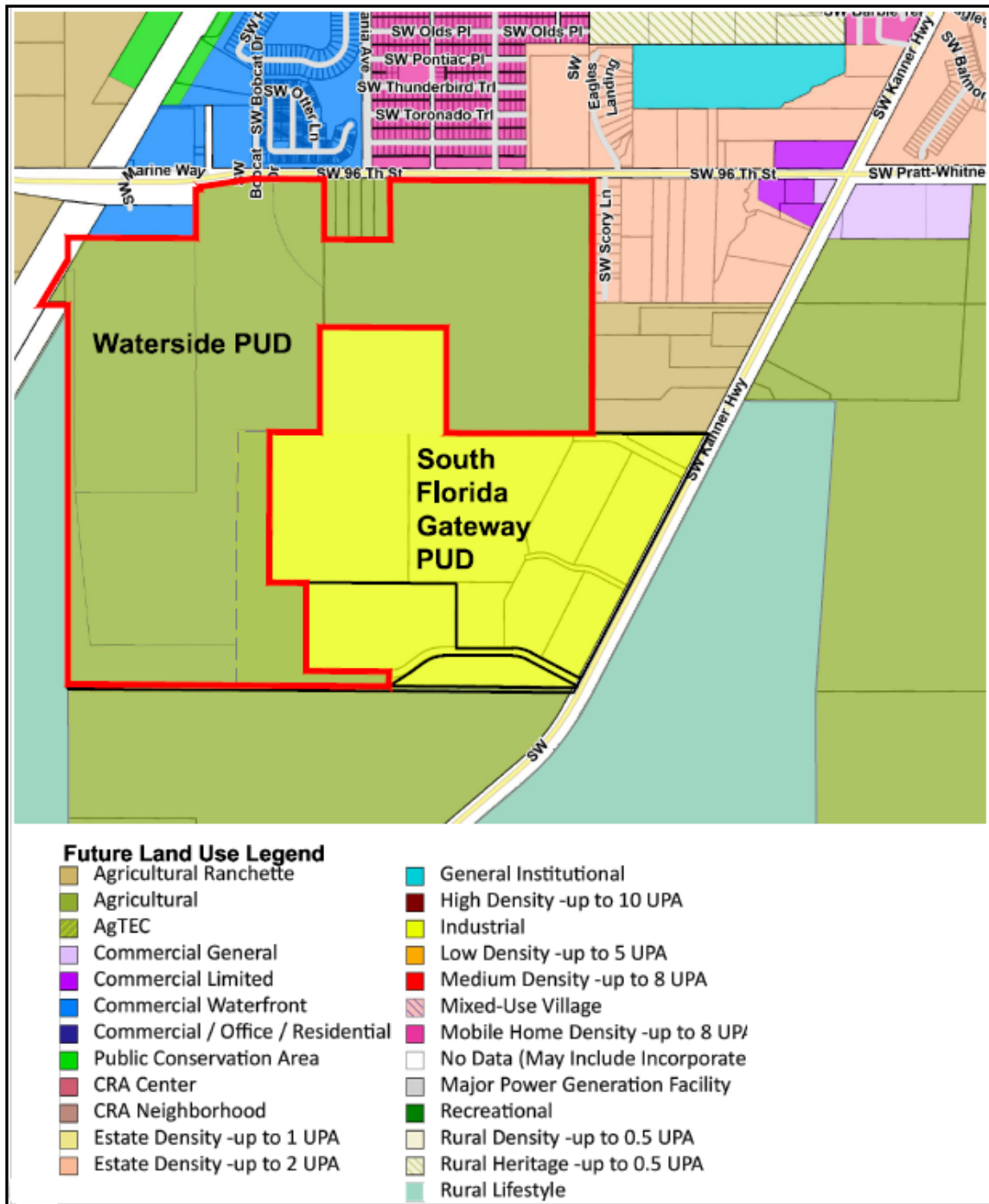


Figure 2. Proposed FLUM in CPA 21-12 with subject site (CPA 21-12) outlined in red.

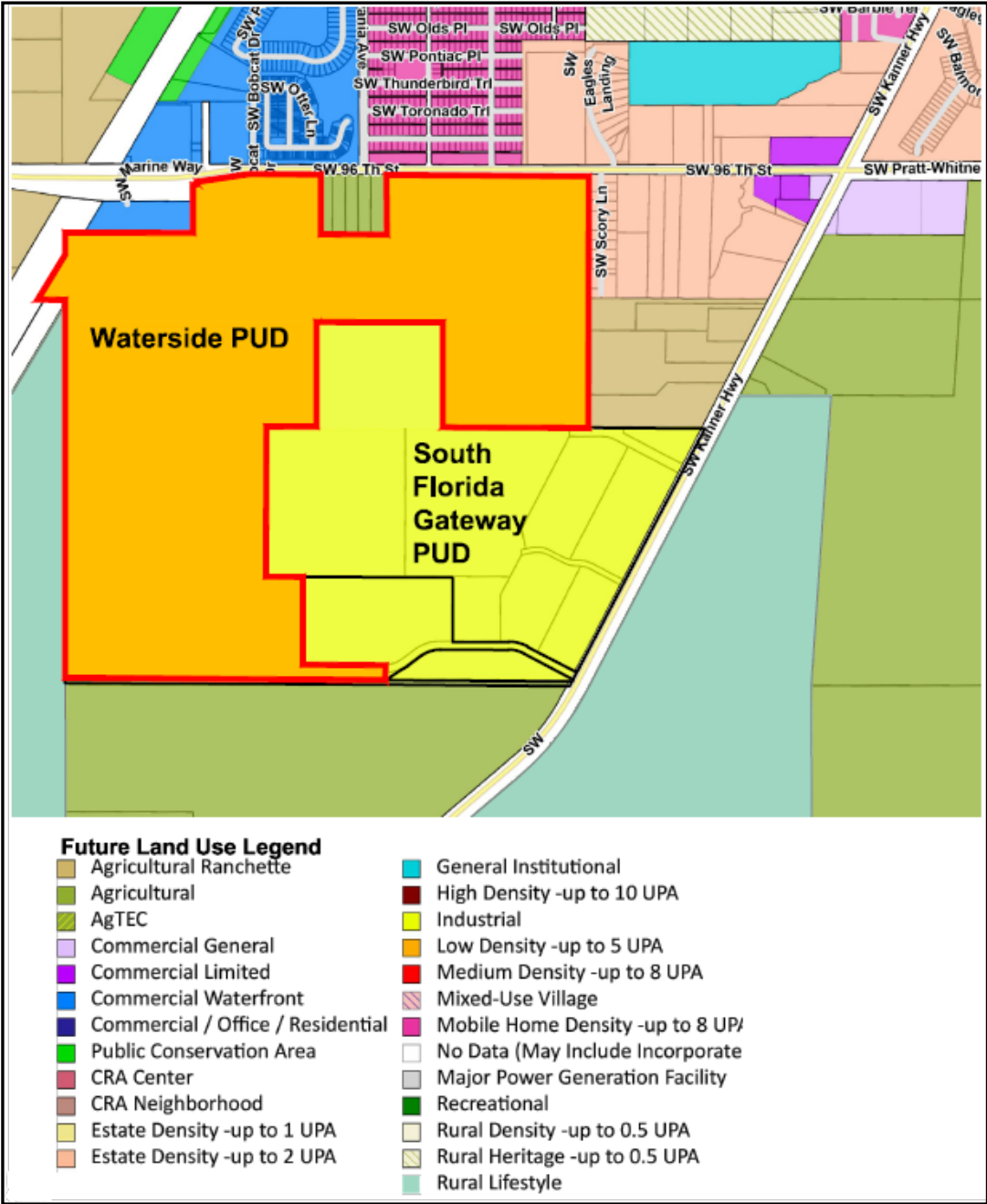


Figure 3. Excerpt of existing Figure 4-2, Urban Service Districts with subject property outlined in red.

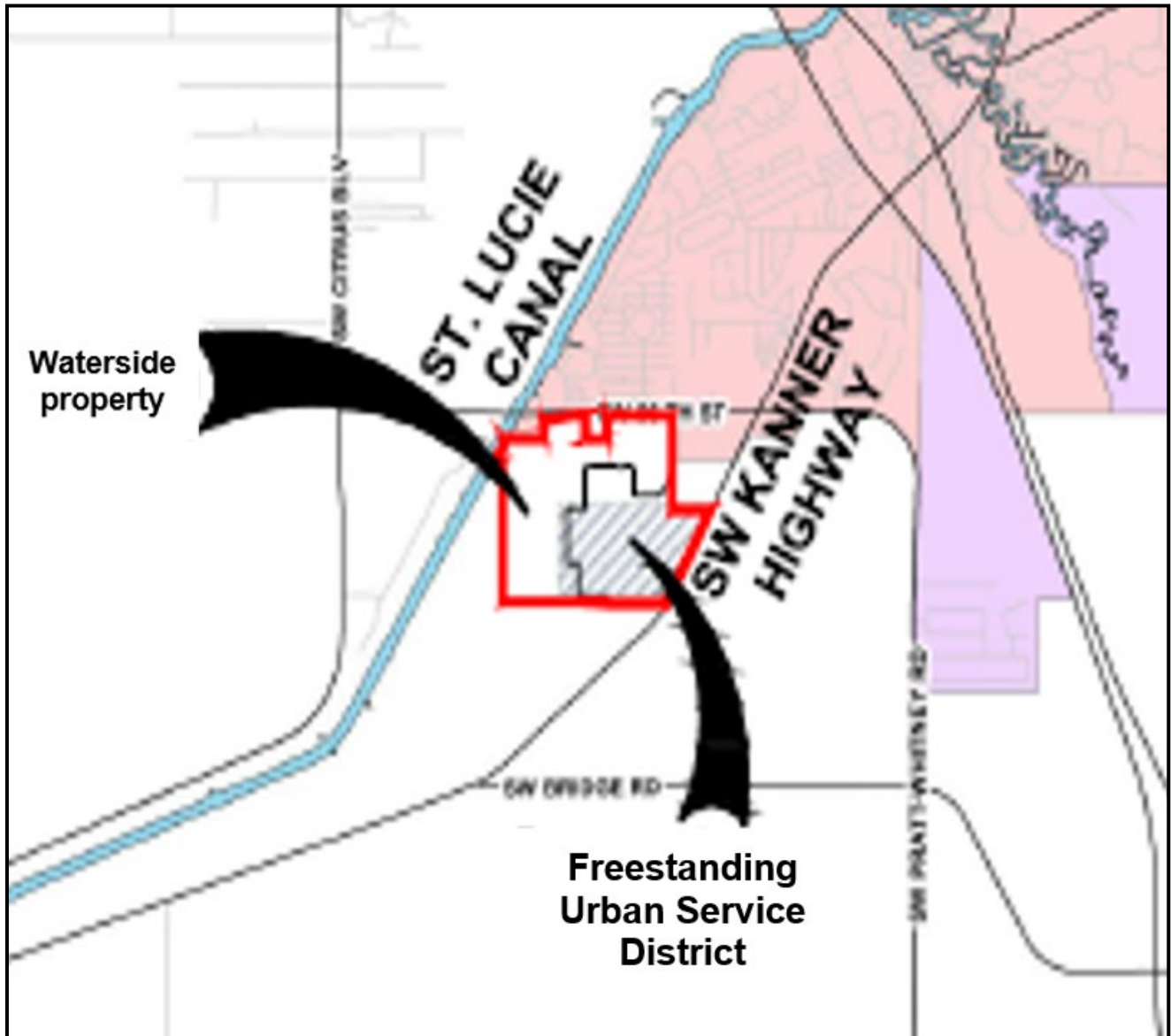
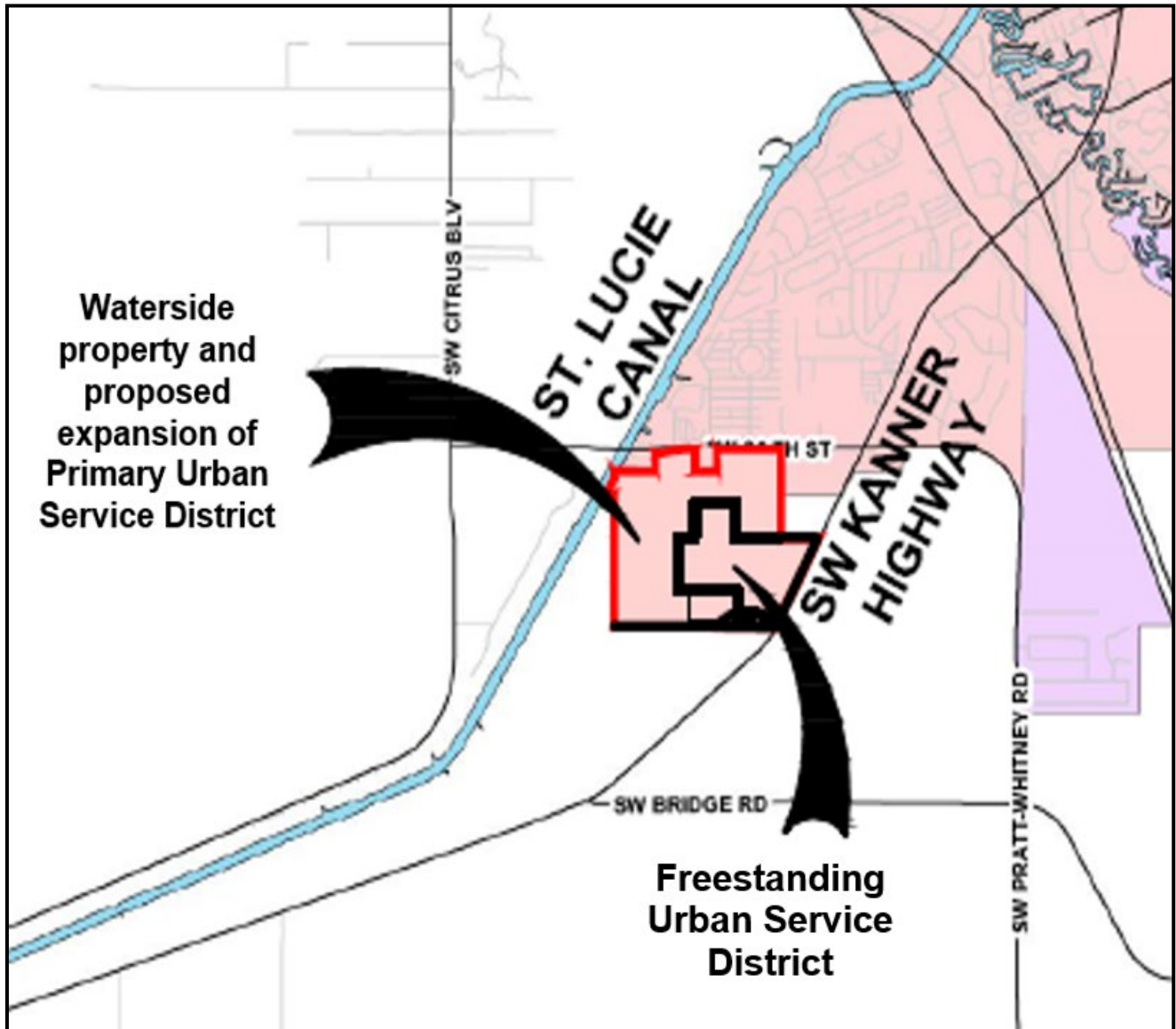


Figure 4. Excerpt of proposed Figure 4-2, Urban Service Districts with subject property outlined in red.



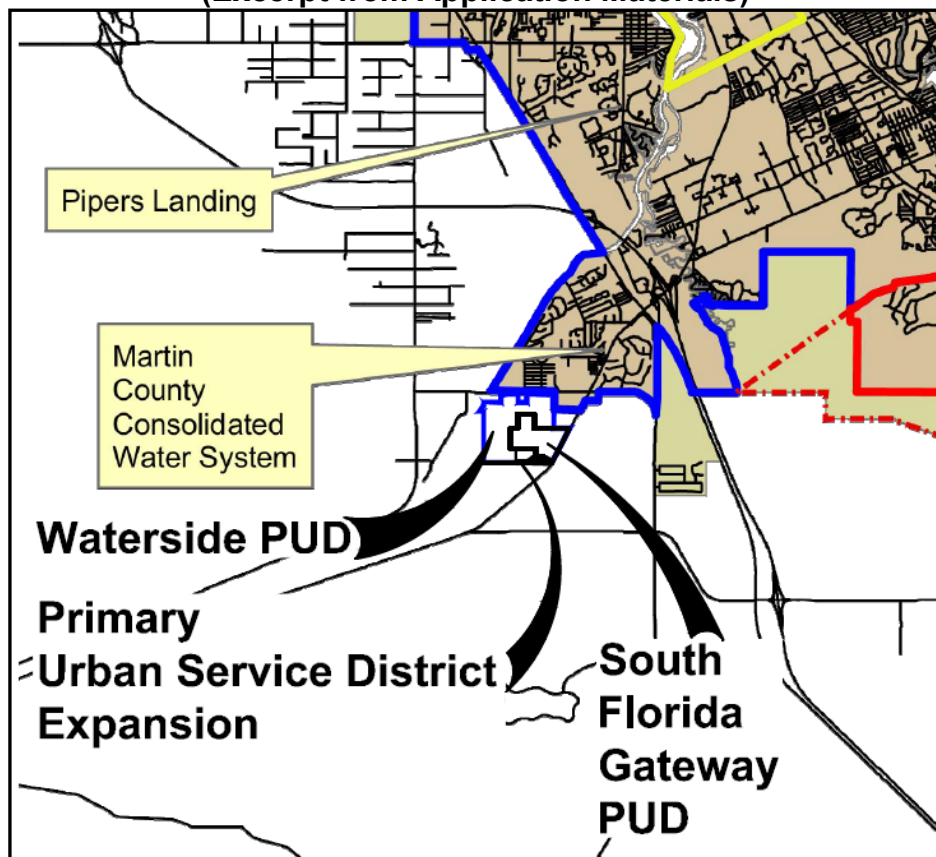
SECTION 1. Primary Urban Service District Boundary

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 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 Urban Service District.

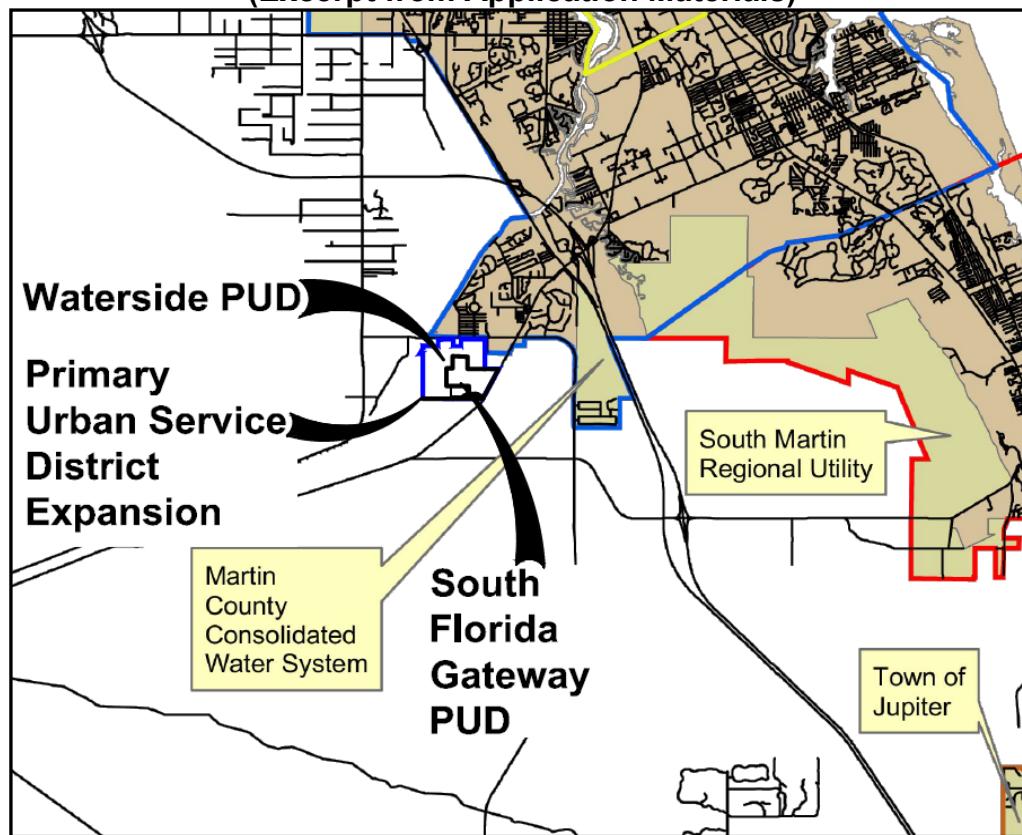
The proposed expansion of the Primary Urban Service District is illustrated on the previous page of this report. It is the applicant's proposed amendment to the existing Figure 4-2 which would expand the Primary Urban Service District to encompass 646 total acres. The pink land area shown in both the existing and proposed Figures 4-2 designate land within the Primary Urban Service District. It is worth noting that there are five parcels adjacent to SW 96th Street that are not part of the Primary USD, and the applicant's proposed expansion of the PUSD in Figure 4-2 does include these five parcels as part of the Primary USD expansion. These five parcels are not included in this application and need to be removed from the Primary USD on the applicant's proposed Figure 4-2.

**Proposed Figure 11-1, Areas Currently Served by Regional Utilities
(Excerpt from Application Materials)**



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 (396 acres, CPA 21-12) and adjacent industrial land within a Freestanding Urban Service District (250 acres) is shown in the blue and black boundaries on the proposed Figure 11-1. If adopted, the Waterside property and the adjacent land with an Industrial future land use would be shown within the blue boundary and in the same brown color that denotes the Primary Urban Service District.

**Proposed Figure 11-2, Potential Service Areas
(Excerpt from Application Materials)**

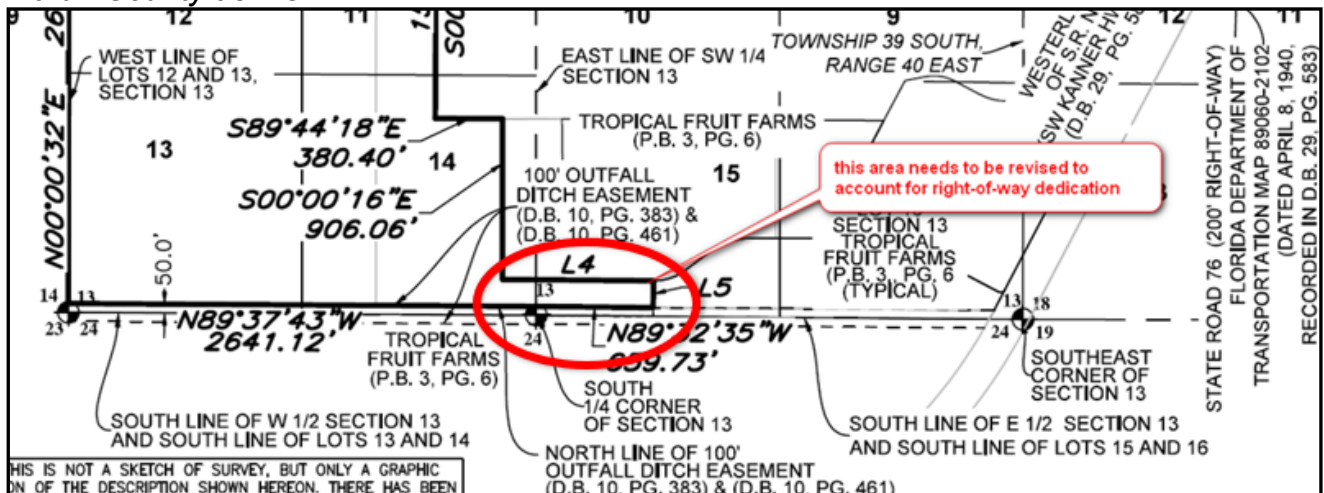


An additional request as part of the proposed expansion of the Primary Urban Service District boundary is to amend Figure 11-2 (as shown above) to encompass the subject 646 total acres. As with Figure 11-1 on the previous page, the Waterside property and the Freestanding Industrial Urban Service District would be shown within the blue boundary and in the same brown color that denotes the Primary Urban Service District, if adopted.

It is worth noting that the proposed Figures 11-1 and 11-2 are not using the most up-to-date Figures 11-1 and 11-2 that are available on the Martin County Growth Management Department website, and the applicant's proposed Figures 11-1 and 11-2 would need to be updated appropriately prior to transmittal.

It appears there are some discrepancies in the applicant's sketch and legal descriptions for the property boundaries that would need to be corrected by the applicant. SW Waterside Way was dedicated as Right-of-Way (ROW) to Martin County on July 15, 2022. The most current sketch and legal description on file with the concurrent FLUM application is dated January 10, 2024, and does not appear to reflect that portion of the southern property boundary that was deeded to Martin County as part of the SW Waterside Way ROW dedication. Below is an excerpt of the most recent sketch & legal description from CPA 21-12 that shows the property boundary for both this text amendment application and the concurrent FLUM application. The area circled in red is roughly the portion of the property boundary that appears to need updating to be consistent with ROW dedications that have already taken place.

Caption: Excerpt of a sketch & legal description of the subject property that shows the southern boundary of the property line. The red circled area of the sketch & legal description likely shows a discrepancy in property boundaries since part of this area was dedicated to Martin County as ROW.



Additionally, there is a drainage easement that runs along the southern boundary of the subject site all the way to SW Kanner Hwy. The Martin County Property Appraiser map shows this easement as part of the boundary for this property. The sketch & legal descriptions submitted by the applicant for both this text amendment and the concurrent FLUM amendment do not show this drainage easement as part of the property boundary. It is important that property ownership boundaries are consistent for any potential expansion of the PUSD or potential changes in future land use designations to prevent future mapping discrepancies.

1.B. – Elimination of the 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 future land use within the adjacent Freestanding Urban Service District. 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 lands within this Freestanding Urban Service District.

“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 4.13A.10. *Industrial development.* The FLUM allocates land resources for existing and anticipated future industrial development needs. The allocation process gives high priority to industry's need for lands 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 plants, manufacturing/processing plants, fabricators of metal products, steam/electricity co-generation plants and uses customarily associated with airports.

Editor's note— Figure 4-2 is on file in the office of the Martin County Growth Management Department.

Private development of airport property shall be subject to an Airport Zoning District or Planned Unit Development (Airport) Zoning District, when such a district is adopted to implement this policy.

The locational criteria require that all development in areas designated Industrial shall provide assurances that regional water distribution and wastewater collection utilities shall be provided by a regional public utility system, as described in the Sanitary Sewer Services Element and the Potable Water Services Element. Areas of the County where freestanding urban services (i.e., regional utility system) can be provided by a group of industrial users may be considered as independent or freestanding urban service districts. They may be illustrated as such on Figure 4-2 in conjunction with formal amendments to the FLUM as provided in section 1.11, Amendment Procedures. All such freestanding urban service districts must comply with the adopted LOS standards in this Plan and the Capital Improvements Element.

~~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.”~~

The proposed deletions above are for internal consistency to ensure that any area currently identified as part of a Freestanding Urban Service District is no longer identified as such if it is reclassified to be part of the Primary Urban Service District.

SECTION 2. Proposed Sub-Area Policies

Another request is to add sub-area development policies as shown in the proposed subsection to Policy 4.1B.2. Subsections (1), (2), (3), (4), (5), and (6) of Policy 4.1B.2 identify development restrictions on specific parcels of land in unincorporated Martin County. These restrictions are typically 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 within the adjacent Freestanding Urban Service District. There are no requested amendments to subsection (2) in the application materials. This staff report is reviewing the proposed text in the applicant's additional subsection. For the sake of succinctness, only subsection (2) pertaining to the Freestanding Urban Service District and the applicant's proposed additional subsection are outlined below, and the other subsections have been omitted from the following quoted text:

“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:

- (2) The following restrictions shall be applied to 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.
 - (a) Uses on the subject property shall be limited to nonresidential uses. Residential uses shall not be permitted.
 - (b) Uses on the property shall be consistent with the future land use designations for the property and the applicable land use policies of the Martin County Comprehensive Growth Management Plan (CGMP).
 - (c) The net inbound AM peak hour trips generated by all uses shall be limited to 950 trips, as demonstrated during the review of final site plans consistent with Article 5, Adequate Public Facilities, Division 3, Traffic Impact Analysis Land Development Regulations.
 - (d) All future applications for development approval shall be processed as a Planned Unit Development (PUD), except for the 29.8-acre parcel

described in the Warranty Deed recorded in OR Book 3325 and Page 2134, Public Records of Martin County, Florida.

- (e) The building footprint of any individual warehouse or distribution facility shall not exceed 1,050,000 square feet.
- (f) No final site plan shall be approved, which provides access to SW 96th Street from that portion of the property designated as Industrial on the Future Land Use Map, unless it is restricted to provide access for emergency purposes only.

(?) 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. In that way the legal description attached to the ordinance would describe the approximately 396 acres subject to the concurrent Future Land Use Map amendment.

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

Staff analysis: Adoption of subsection (a) would alter the analysis of CPA 21-12, the concurrent 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 (density equals +/- 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.

“(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: A monetary donation to the Martin County Community Land Trust of \$1,000 per residential unit (1,050 proposed units) would equal \$1,050,000. However, this language must be removed from this text amendment application. It is more appropriate to be brought forward as part of a PUD zoning agreement as a proposed public benefit.

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

Staff analysis: The proposed subsection (c) would require development on the 396 acres in CPA 21-12 to proceed as a PUD zoning agreement, which could allow for larger buffers

between the proposed residential use and the adjacent land with an Industrial future land use. A PUD zoning agreement and the flexible, negotiated aspects of this agreement could mitigate some compatibility concerns between residential and industrial uses.

As discussed above, Subsection (2) of Policy 4.1B.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 land via SW Waterside Way, which could potentially create conflicts with this existing restriction within Policy 4.1B.2.

“(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 (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.

Staff reviewed and analyzed a traffic analysis submitted by the applicant and prepared by O'Rourke Engineering & Planning, (dated April 3, 2023, revised March 19, 2024). This study analyzed impacts based on the addition of 1,050 residential units since that is the requested number of units that this text amendment application limits the project to. There are two instances in the applicant's traffic analysis where the project engineer states that the subject parcels are “located on SR-76 (Kanner Highway)” or have frontage along SR-76. However, the Waterside property does not have direct frontage on Kanner Highway and would only access Kanner Highway by connecting to SW Waterside Way. Please see the inter-office memorandum from the Public Works Department regarding the applicant's transportation analysis dated July 15, 2025.

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 PUSD.

“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;
- (2) Not result in incompatibilities with adjacent land uses;
- (3) Not adversely impact environmental, natural, historical or archaeological resources, features or systems to a degree that is inconsistent with this Plan;
- (4) Be consistent with Goal 4.9 relating to appropriate residential land use capacities;
- (5) Demonstrate that reasonable capacity does not exist on suitable land in the existing Primary Urban Service District for the 20-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;
- (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;
- (7) Demonstrate that the full range of urban public facilities and services can be economically and efficiently supplied at the adopted LOS standards; and
- (8) Be consistent with the adopted Capital Improvements Element."

The eight subsections of Policy 4.7A.7 are shown in *italic* text followed by staff analysis.

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

Staff analysis of Policy 4.7A.7(1): Section 4 of this staff report evaluates proposed amendments to Plan text that deal with residential capacity methodology. The applicant has proposed to significantly change the way that residential capacity is calculated that deviates from adopted Plan policies. Furthermore, the proposed amendments to various sections of Plan text would create internal inconsistencies with each other, as described in Section 4 of this report.

As mentioned in Section 2 of this staff report, it is unclear how industrial traffic from the adjacent industrial lands would be restricted from accessing SW 96th Street if a road network is built that connects the residential and industrial uses via SW Waterside Way. This would create a conflict with the existing sub-area policy restriction that prohibits the industrial users from accessing SW 96th Street, as stated in Policy 4.1B.2. This criterion has not been met.

(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 within the Freestanding Urban Service District, which could cause compatibility problems. 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.

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 may be less than compatible 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 bordered on three sides by Primary Urban Service District with the proposed expansion. This criterion has not been met.

(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.

(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.

“Goal 4.9. To provide for appropriate and adequate lands for residential land uses to meet the housing needs of the anticipated population and provide residents with a variety of choices in housing types and living arrangements throughout the County.

Objective 4.9A. To monitor population growth, development orders and Future Land Use Map amendments to ensure that an appropriate and adequate supply of residential land use is maintained in the unincorporated areas of the County.

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.”

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 amending 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. This criterion has been met.

(5) Demonstrate that reasonable capacity does not exist on suitable land in the existing Primary Urban Service District for the 20-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, revised February 2024) was submitted by the applicant on March 25, 2024 and December 23, 2024. 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. These percentages were calculated using methodology created by the applicant that may or may not be consistent with their proposed text amendments to residential capacity methodology discussed in Section 4 of this staff report. This methodology is not consistent with the existing Plan policies of the Comprehensive Growth Management Plan.

However, a Residential Capacity Analysis prepared by Metro Forecasting Models (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.

A new Residential Capacity Analysis must be done because the December 2023 analysis considered only 10 and 15-year planning periods. Changes to Florida Statutes required the Plan text, quoted above, to change from a 15 to a 20-year planning period. The change from a 15 to a 20-year period, shown above, was adopted by the Martin County Board of County Commissioners on March 25, 2025 and became effective May 16, 2025.

Demand versus Supply Analysis for Planning Period 2020-2030

Eastern USDs	2030 Demand	Unit Supply	Percent of Need in the 10-year Planning Period
Eastern Primary	4,036	13,142	326%
Eastern Secondary	679	1,088	160%
Total	4,715	14,230	302%

Demand versus Supply Analysis for Planning Period 2020-2035

Eastern USDs	2030 Demand	Unit Supply	Percent of Need in the 15-year Planning Period
Eastern Primary	5,542	13,142	237%
Eastern Secondary	932	1,088	117%
Total	6,474	14,230	220%

- (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. Compliance with all applicable habitat preservation requirements may provide compliance with criterion (6). This criterion has been met.

- (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 memorandum from Martin County Utilities and Solid Waste Department (dated August 19, 2024) attached to CPA 21-12.

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. A proposed PUD zoning agreement would need to provide the full range of urban public facilities and services to demonstrate compliance with the sub-area policies proposed by the applicant. Please see page 16 of this staff report. Compliance with the applicant's proposed sub-area policy text and all adopted LOS standards may provide compliance with criterion (7). This criterion has been met.

(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 16 of this staff report. Compliance with the applicant's proposed sub-area policy text and the Capital Improvements Element may provide compliance with criterion (8). This criterion has been met.

SECTION 4. Proposed Amendments to Residential Capacity Analysis Methodology

The applicant is proposing 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 is currently adopted. The following text amendments are grouped together in this section of the report based on their relation with other Plan policies that cover the same or similar topics.

AMENDMENTS TO CHAPTER 2, OVERALL GOALS AND DEFINITIONS –

The applicant is proposing text amendments to **Section 2.4** – Definitions of Chapter 2, Overall Goals and Definitions of the CGMP. These changes include the addition of new definitions relating to residential capacity and population, and the revision of existing definitions. The applicant's proposed amendments to Section 2.4 of Chapter 2 are quoted below:

"Housing units: Means 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 as classified by the US Census."

*"~~Occupied Housing units in actual use: Means~~ A housing unit is occupied if a person or group of persons is living in it at the time of the US 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 is the same as, or equal to, the number of **households** ~~the number of residential housing units occupied by permanent residents as classified by the US Census, plus the number of vacant seasonal housing units. Housing units in actual use equals the occupied housing units plus vacant seasonal housing units.~~"*

STAFF NOTE: the word "households" in the proposed text is highlighted because the application materials do not show it as underlined, but the word is proposed for addition and should be underlined.

"Household: Means the related family members and all the unrelated people, if any,

such as lodgers, foster children, wards, or employees who share the housing unit as classified by the US Census.”

“Group Quarters: As classified by the US Census, means 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 those services. This is not a typical household-type living arrangement. People living in Group Quarters usually are not related to each other. Group Quarters 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.”

“Vacant Housing Units: 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 as classified by the US Census.”

“Categories of Vacant Housing Units, as classified by the US Census, are as follows:

- Vacant Housing Units for Rent: Vacant units offered for rent and those [which may also be] offered both for rent and sale.
- Vacant Housing Units for Sale: Limited to vacant housing units for sale only; excludes vacant housing units both for rent and sale. If a vacant housing unit was located in a multi-unit structure which was for sale as an entire structure and if the vacant housing unit was not for rent, it was reported as vacant housing unit held off market. However, if the individual vacant housing unit was intended to be occupied by the new owner, it was reported as vacant housing unit for sale.
- Vacant Housing Units Rented or Sold: Vacant housing units which have been rented or sold but the new renters or owners have not moved in.
- Vacant Housing Units held off the Market: Vacant housing units held for occasional use, temporarily occupied by persons with usual residence elsewhere, and vacant for other reasons.
- Vacant Seasonal Housing Units: Vacant housing units intended for occupancy only during certain seasons of the year, found primarily in resort areas. Vacant housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as vacant seasonal housing units.
- Other Vacant Housing Units: Year-round vacant housing 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.”

“Peak population (housing): The number of residents living in residential housing units for more than six months of the year, and the number of occupants of residential housing who spend less than six months 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 residential housing units.”~~

“Permanent population (housing): The number of residents living in the unincorporated area in ~~residential~~ occupied housing units or households (classified by the US Census as population in occupied housing units) ~~for more than six months of the year.”~~

“Persons per household (unincorporated Martin County): The number of permanent residents living in ~~residential~~ occupied housing units or households (classified by the US Census as population in occupied housing units) divided by the number of occupied housing units (provided by the US Census or EDR, sourced from BEBR, in a given year) to arrive at the persons per household for unincorporated Martin County. Example using 2010 US Census data: 124,120 persons / 54,709 units = 2.27 persons per occupied housing unit or household.”

“Seasonal population (housing): 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 US Census and defined in this chapter.”

Staff analysis of proposed amendments to Section 2.4, Chapter 2: Some of these new and revised definitions appear to be used in the proposed demand calculations examined later in this staff report. However, there are numerous definitions under the “categories of vacant housing” that are proposed for addition but are not used in the proposed methodology for calculating residential capacity. This includes the terms “vacant housing units for rent,” “vacant housing units for sale,” and “vacant housing units held off the market.” This creates confusion in the methodology and seems unnecessary to include terms that have no applicability in the residential capacity methodology. Additionally, the applicant is proposing a new definition for the term “vacant seasonal housing unit” but the application materials dated June 19, 2025 do not propose to delete the existing definition in Chapter 2 for this same term. This internal inconsistency could create substantial confusion with having the same term defined two different ways. Further staff analysis is needed to evaluate the incorporation of new and revised definitions into a new methodology for calculating

residential capacity.

The US Census is referenced as the source for some of the proposed definitions quoted above. The US Census website has different ways to define some of these terms, as found on their glossary webpage and a PDF document from the “Housing Vacancies and Homeownership” Census webpage. The definitions found in this Census PDF document appear to be “new metropolitan and micropolitan statistical definitions announced by OMB [United States Office of Management and Budget] in February 2013...” It is unclear which definition would be more correct to use and the applicant did not provide an explanation for why one definition from the Census was chosen over the other. The applicant’s proposed definitions also do not match word-for-word some of the definitions provided by the US Census.

Some of the proposed definitions appear to be making a distinction without a difference. The proposed definition for “occupied housing unit” states that “the number of occupied housing units is the same as, or equal to, the number of households,” but then the applicant provides three different definitions for the terms “housing units,” “occupied housing units,” and “household.” These proposed definitions seem to make the topic of residential capacity more complicated and do not serve to provide clarity.

POPULATION TECHNICAL BULLETIN –

Another request includes amendments to **Policy 4.1D.2**, *Population technical bulletin*, and **Section 1.7.A**, *Population estimates*. These proposed changes are shown below.

“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 University of Florida Bureau of Economic and Business Research (BEBR) as the cited source for EDR estimates and projections.

The ~~medium~~ EDR estimate, sourced from BEBR, 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, sourced from BEBR, ~~medium~~ population projections for Martin County shall be used. The EDR, sourced from BEBR, provides estimates for permanent population (housing). The permanent population (housing) shall be as calculated and provided by the EDR, sourced from BEBR, and the US Census.

- (3) Municipal permanent population (housing) shall be subtracted from total county permanent population (housing) to arrive at the estimate for total permanent population (housing) for the unincorporated area. The population Technical Bulletin shall show what portion of the permanent population (housing) is housed in ~~residential~~ occupied housing units.
- (4) Peak population in residential housing units and peak population for LOS determination shall be calculated as outlined in Sections 1.7D and 1.7 E.”

“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 estimates and projections published by the Office of Economic and Demographic Research (EDR) and the University of Florida Bureau of Economic and Business Research (BEBR) as the cited source for EDR 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) provides annual updates to the estimates and projections sourced from the University of Florida Bureau of Economic Business Research (BEBR). In the years in between the decennial Census, the permanent population estimates and projections provided by EDR, sourced from 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 percentage of the total permanent population residing within the unincorporated area shall be multiplied by EDR projections for the total county, sourced from BEBR, 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.”

Staff analysis of proposed text amendments to Policy 4.1D.2 and Section 1.7.A: The applicant has proposed to amend the definition for *permanent population (housing)*, as discussed in the previous subsection of Section 4 of this report, and then this amended term is proposed in various places in the Plan text. There are various terms that are defined by both BEBR and the US Census Bureau and are also proposed for amendment in this text amendment application, but it is unclear what the purpose of the applicant’s proposed definition changes are and what the effective outcome of these changes would be when applied.

There appear to be internal inconsistencies with the applicant’s proposed text in Section 1.7.A(3) and similar language that appears in Section 4.2A.(8)(a). These two sections of text need to be internally consistent with each other to not create conflicts. Additionally, Policy 4.1D.2 and Section 1.7.A, as proposed, are internally inconsistent with each other since the applicant’s proposed amendments are different for each section. Staff cannot support amendments that create internal inconsistencies within the Plan text.

It is not abundantly clear what the reasoning is for the proposed change in using “occupied housing units or households” compared to “residential housing units” for level of service determination in Section 1.7.A.(4). For the proposed amendments to Section 1.7.A.(3), staff is unsure if the applicant is proposing that the percent increase each year be averaged out over a 5-year period.

Florida Statutes (F.S.) § 163.3177(6)(a)4 states “... The element shall accommodate at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period...” It is a requirement for local governments to utilize EDR’s medium population projections and staff does not recommend deleting the word “medium” as proposed by the applicant. This amendment would allow ambiguity for which EDR population projection level staff would use as the basis for the Population Technical Bulletin.

Policy 4.1D.2(4) is not proposed for amendment and therefore, the existing language in Section 1.7.D should not be proposed for deletion by the applicant (see page 40 of this report). Section 1.7.D describes “peak population in residential housing units for the unincorporated area,” and the proposed amendments in Policy 4.1D.2 would be internally inconsistent with the proposed deletion of the existing Section 1.7.D. This policy and other aspects of the Population Technical Bulletin and residential capacity methodology are being made more complicated and confusing with the proposed definitions explored in the

previous sub-section of this report and with other proposed amendments.

RESIDENTIAL DEMAND CALCULATIONS –

The applicant has proposed to amend parts of the CGMP pertaining to residential capacity analysis methodology in **Section 4.2A(8)**; **Policy 4.1D.3**, *Future residential housing unit demand*; **Section 1.7.B**, *Housing unit demand projection*; and **Policy 4.1D.4**, *Distribution of housing unit demand*. The County currently has specific methodology for calculating residential demand that is used in the calculation of available residential capacity within the Urban Service Districts. The proposed amendments to each of these sections of the CGMP are shown below.

“Section 4.2A.(8) Population and projected residential demand for housing units.

(a) Population projections for demand of future residential housing units. The base data for population estimates and projections comes from the U.S. Decennial Census. In between decennial Census years, the University of Florida’s Bureau of Economic and Business Research (BEBR) provides annual updates to the estimates and projections to the Office of Economic and Demographic Research (EDR). In the years in between the decennial Census, the permanent population estimates and projections provided by EDR shall be used in the annual update to the Population Technical Bulletin to project permanent and seasonal population for the planning horizon of the Plan.

See Chapter 2 for definitions of population and housing terms used in the text of the Plan.

Subtracting permanent population (housing) for the five Martin County municipalities from permanent population (housing) countywide provides the permanent population (housing) for the Martin County unincorporated area. ~~Permanent population is defined as those residents who spend more than six months of the year in Martin County.~~

~~Persons per household (unincorporated Martin County) is the number of permanent residents living in residential housing units (classified by the Census as population in occupied housing) divided by the number of occupied housing units (provided by the US Census or American Community Survey in a given year) to arrive at the persons per household for unincorporated Martin County. Example using 2010 Census data: 124,120 persons/ 54,709 units= 2.27 persons per unit.~~

Every ten years the US Census provides detailed data on the number of housing units. American Community Survey Data shall be used as source data between Decennial Census years.

~~“Occupied housing units” are the number of residential housing units occupied by~~

~~permanent residents who live in residential units rather than in prison or group homes.~~

~~All other housing units are classified by the census as "vacant housing."~~

~~The vacant housing is broken into a number of categories. "Vacant seasonal housing units" represent housing units that are occupied less than six months of the year by seasonal residents.~~

~~Occupied housing plus vacant seasonal housing equals the number of housing units actually in use.~~

~~The projected, permanent population (housing) divided by the permanent population (housing), provides the percentage increase in population. Multiply this percentage times the number of housing units actually in use by permanent and seasonal residents to determine the housing need in the future period. This provides the simplest and most accurate estimate for future housing needs. American Community Survey Data shall be used as source data between Decennial Census years.~~

The demand for future housing units in the unincorporated area shall be based on the percentage increase in permanent population (housing) for the unincorporated area projected by the Population Technical Bulletin, as well as 5-year average percent of housing units in select vacancy conditions. Projections of housing unit demand are based on expected increases in permanent population (housing) for the unincorporated area and shall be based on calculations described below:

Permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing units

Projected permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing unit demand

Vacant housing units rented or sold / housing units = percent of housing units that are vacant housing units rented or sold

Vacant seasonal housing units / housing units = percent of housing units that are vacant seasonal housing units

Other vacant housing units / housing units = percent of housing units that are other vacant housing units

Percent of housing units that are vacant housing units rented or sold + percent of

housing units that are vacant seasonal housing units + percent of housing units that are other vacant housing units = minimum housing unit vacancy

Sum of values / count of values = average

(occupied housing unit demand * 5-year average minimum housing unit vacancy) + occupied housing unit demand = projected future housing unit demand"

"Policy 4.1D.3 Future residential housing unit demand.

~~Future housing demand projections shall be based on all of the following:~~ The demand for future housing units in the unincorporated area shall be based on the percentage increase in permanent population (housing) for the unincorporated area projected by the Population Technical Bulletin, as well as 5-year average percent of housing units in select vacancy conditions. Projections of housing unit demand are based on expected increases in permanent population (housing) for the unincorporated area and shall be based on calculations described below:

Permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing units

Projected permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing unit demand

Vacant housing units rented or sold / housing units = percent of housing units that are vacant housing units rented or sold

Vacant seasonal housing units / housing units = percent of housing units that are vacant seasonal housing units

Other vacant housing units / housing units = percent of housing units that are other vacant housing units

Percent of housing units that are vacant housing units rented or sold + percent of housing units that are vacant seasonal housing units + percent of housing units that are other vacant housing units = minimum housing unit vacancy

Sum of values / count of values = average

(occupied housing unit demand * 5-year average minimum housing unit vacancy) + occupied housing unit demand = projected future housing unit demand

~~(1) The 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.~~

~~(2) Occupied housing units (HO) are classified by the Census as those residential housing units in use by permanent population. Vacant seasonal housing units (HS) are classified as those residential housing units 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.~~

~~(1) Future residential housing needs shall be updated every five years.~~

~~(7)(2) See Chapter 2 for definitions of population and housing terms used in the text of the Plan."~~

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

(1) See Chapter 2 for definitions of housing terms used in the text of the Plan.

(2) The demand for future ~~residential~~ housing units in the unincorporated area shall be based on the percentage increase in permanent population (housing) for the unincorporated area projected by the Population Technical Bulletin, as well as percentage increase in vacant housing units.

Permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing units

Projected permanent population (housing) / persons per household (unincorporated Martin County) = occupied housing unit demand

Vacant housing units rented or sold / housing units = percent of housing units that are vacant housing units rented or sold

Vacant seasonal housing units / housing units = percent of housing units that are vacant seasonal housing units

Other vacant housing units / housing units = percent of housing units that are other vacant housing units

Percent of housing units that are vacant housing units rented or sold + percent of housing units that are vacant seasonal housing units + percent of housing units that are other vacant housing units = minimum housing unit vacancy

Sum of values / count of values = average

(occupied housing unit demand * 5-year average minimum housing unit vacancy) + occupied housing unit demand = projected future housing unit demand

~~(1)~~

~~(2) Occupied housing units (HO) are classified by the census as those residential housing units in use by permanent population.~~

~~Vacant seasonal housing units (HS) are classified as those residential housing units that are seasonally occupied by residents who spend less than six 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).~~

$$\text{HU} = \text{HO} + \text{HS}$$

~~(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."~~

"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~~ housing units built in for the preceding five years, based on the "Actual Year Built" as reported in the most recent Final Martin County Tax Roll. The number of ~~Certificates of Occupancy~~ housing units built 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 unit demand must be met within the Primary and Secondary Urban Service Districts."

1.7.B, and Policy 4.1D.4: The applicant is proposing to delete the entirety of the existing methodology for calculating residential demand and replace it with a new demand methodology. The proposed demand calculation methodology differs substantially from the adopted Plan text. It is impossible to fully know the results of the proposed text changes without a calculation of residential capacity based upon the methodology changes. The applicant appears to take the new and amended definitions from Chapter 2 and utilize them in this new demand calculation methodology. In the June 19, 2025 resubmittal examined in this report, the applicant did not submit a revised version of their proposed Residential Capacity Analysis, prepared in previous submittals by GAI Consultants, that would intend to demonstrate the results of the proposed methodology outlined in this text amendment request.

The proposed methodology above outlines that the value for “occupied housing units” would be obtained by dividing permanent population (housing) by the persons per household (unincorporated Martin County). However, the proposed definition for the term “occupied housing units” in Chapter 2 states “A housing unit is occupied if a person or group of persons is living in it at the time of the US 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 is the same as, or equal to, the number of households as classified by the US Census.” The proposed definition for this term and the way that it is applied in the applicant’s methodology would seem to create confusion and internal inconsistency.

There is conflicting language in the text proposed in both Policy 4.1D.3 and Section 1.7.B(2). Proposed text in Policy 4.1D.3 states “The demand for future housing units in the unincorporated area shall be based on the percentage increase in permanent population (housing) for the unincorporated area projected by the Population Technical Bulletin, as well as 5-year average percent of housing units in select vacancy conditions.” Proposed text in Section 1.7.B(2) states “The demand for future ~~residential~~ housing units in the unincorporated area shall be based on the percentage increase in permanent population (housing) for the unincorporated area projected by the Population Technical Bulletin, as well as percentage increase in vacant housing units.” These two pieces of proposed text are saying that the demand for future housing units is based upon two different metrics, which makes the Plan text unclear and provides inconsistent direction for the basis of this calculation.

The amendment to Policy 4.1D.4 appears to utilize the total number of housing units built compared to the number of housing units built inside the urban service districts 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.

RESIDENTIAL SUPPLY CALCULATIONS –

The applicant has proposed to amend **Section 4.2A.(9)**, *Residential capacity determination*, **Policy 4.1D.5**, *Residential capacity analysis*, **Section 1.7.C**, *Residential capacity calculations*, and **Policy 4.1D.6** to include similar deletions and additions to each policy. The County has a specific methodology for calculating residential supply that is used in the calculation of available residential capacity within the Urban Service Districts. The proposed amendments to each of these sections of the Comprehensive Growth Management Plan are quoted below.

“Section 4.2A.(9) Residential capacity determination. The challenge in providing for residential capacity is to provide adequate vacant land concentrated within the urban service districts to meet the needs of the projected population. The urban service districts are a key strategy for assuring that growth occurs where public facilities can be provided in an efficient cost-effective manner. Outside the urban service districts residential development is limited to twenty acre minimum lot sizes in the Agricultural Land Use and five acre lot sizes in the Agriculture Ranchette Land Use. A modest amount of growth happens outside the boundaries of the urban service districts and should be accounted for when projecting the increase in population that must be served within the urban service districts. 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 20-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.

The 20-year planning period for residential capacity shall begin with the 2010 Census and shall be updated to a new 20-year planning period every 5 years.

Residential supply calculations. Residential capacity represents the supply for residential development within the two urban service districts to meet the projected population demand for residential units in the 20-year planning period. The calculation of residential supply within the urban service districts shall include:

1. Vacant property that allows residential use according to the Future Land Use Map. To account for various conditions which prevent achieving maximum allowable densities, 75% of ~~T~~the maximum allowable density shall be used in calculating the number of available housing units on vacant non-agricultural acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be one-half zero. T~~he~~ 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.~~

~~3. Potential for residential development in the CRAs.~~

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

~~In a normal housing market there will always be a percentage of vacant housing. Calculations of "excess vacancy" are based on the assumption that 3% of the total unincorporated housing units will normally be vacant. When the vacant housing number exceeds 3% of the total number of housing units in actual use, the excess shall be included in the calculation of available residential capacity.~~

Residential capacity shall be re-calculated every five years to ensure that adequate capacity continues to exist for no less than ten years.

A small portion of the housing needs for the County's projected growth is regularly met by large lots outside the two urban service districts. An appropriate percentage of future growth will be assigned to the area outside the urban service districts 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 total Certificates of Occupancy for the unincorporated area to determine appropriate percentage."

"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 various conditions which prevent achieving maximum allowable densities, 75% of the maximum allowable density shall be used in

calculating the number of available housing units on vacant non-agricultural acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be ~~one-half~~ zero. ~~The~~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 wetland 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.~~

~~(3) Potential for residential development in the CRAs.~~

~~(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 20-year planning period for residential capacity began with the 2010 Census and shall be updated to a new 20-year planning period every 5 years. The residential capacity analysis showing the total residential housing unit supply within the Primary and the Secondary Urban Service Districts shall be compared to the projected residential housing unit 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 20-year planning period.”

“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 20-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 various conditions which prevent achieving the maximum allowable densities, 75% of T~~the~~the maximum allowable density shall be used in calculating the number of available housing units on vacant non-agricultural acreage. For the purpose of this calculation, the maximum allowable density for wetlands shall be one-half zero. T~~the~~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.~~

~~(3) Potential for residential development in the CRAs.~~

~~(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."~~

"Policy 4.1D.6. The residential capacity analysis will determine if the future demand for residential housing units exceeds the supply for residential housing 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 20-year planning period, planning for expansion of residential capacity shall commence. When the undeveloped acreage within either the Primary Urban Service District or Secondary Urban Service District provides for no more than 10 years of projected population growth, the County is required to expand capacity."

Staff analysis of proposed text amendments to Section 4.2A.(9), Policy 4.1D.5, Section 1.7.C, and Policy 4.1D.6: The proposed amendments to Section 4.2A.(9).1, 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 of any given future land use designation 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. After reviewing the applicant's

supporting data and analysis, GAI Residential Capacity Analysis (dated March 2023 and revised February 2024), it is unclear if the complex method of estimating potential wetland density, as proposed by the applicant, was followed in the GAI report.

The last paragraph of Section 4.2A.(9) has similar language to Policy 4.1D.4 that is explored earlier in this report (see page 33). The applicant has not proposed any amendments to this paragraph of Section 4.2A.(9), which would create internal inconsistencies between this language in Section 4.2A.(9) and the proposed amendments to Policy 4.1D.4.

It is not clear how the entirety of the proposed text above would be applied, and staff has created two examples to illustrate what the language appears to say and compare how wetland density transfer could occur on a site plan.

Example 1: 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: $(5 \text{ upa} \times 0.75) \times 4 \text{ ac} = \mathbf{15 \text{ total units.}}$

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.**

Example 2: 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: $(5 \text{ upa} \times 0.50) \times 6 \text{ ac} = \mathbf{15 \text{ total units.}}$

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 units (upland portion) + 10 units (wetland density transfer) = **40 total units.**

As shown in both math examples, the proposed methodology calculates a much lower potential for development. 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. 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 applicant would also need to amend Chapter 9, Conservation and Open Space Element, regarding wetland

density transfer for internal consistency with the above proposed changes. No amendments to Chapter 9 for wetland density transfer were proposed in the application materials for this text amendment.

The applicant's supporting data and analysis produced by GAI Consultants (dated March 2023, revised February 2024) does not include the Commercial Waterfront future land use designation in their evaluation of residential land uses and vacant acreage for potential units (Table 13, GAI Residential Capacity Analysis). The Commercial Waterfront future land use designation does allow for residential uses at a maximum of ten (10) units per acre. The GAI Residential Capacity also does not account for residential densities permitted on any of the CRA future land uses except CRA Neighborhood. The 2023 Residential Capacity Analysis produced by Metro Forecasting Models on behalf of Martin County does include the Commercial Waterfront future land use vacant acreage towards the potential units for residential supply and does include a separate analysis of the development potential within the CRAs. Not including vacant Commercial Waterfront acreage or the potential for residential development within the other CRA future land use categories in the calculation of potential residential units would seem to undercount the available supply for residential capacity.

The applicant is proposing to delete existing text that includes vacant, subdivided, single-family lots of record in the calculations for residential supply. These existing lots of record are part of the supply 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.

The applicant is proposing to exclude potential residential development in Community Redevelopment Areas (CRAs). As with vacant lands that are counted towards residential supply, any potential residential development in the CRAs should be counted into the supply of residential lands available for capacity.

Staff does not recommend approval of the changes proposed for Section 4.2A.(9), Policy 4.1D.5, Section 1.7.C, and Policy 4.1D.6. The proposed changes would not account for the existing supply of residential units or the maximum densities and intensities permitted by a given future land use designation.

PEAK AND WEIGHTED POPULATION –

The applicant is proposing to delete Section 1.7.D, *Peak population in residential housing units for the unincorporated area*, and renumber Section 1.7.E, *Peak and weighted average population for Level of Service determination (LOS)* and Section 1.7.F for consistent numbering. The proposed amendments to each of these sections are outlined below.

~~“1.7.D. ***Peak population in residential housing units for the unincorporated area.***”~~

~~The number of residents living in residential housing units for more than six months of the year, and the number of occupants of residential housing who spend less than six months 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 residential housing units.~~

~~“1.7.E.~~ 1.7.D. *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.
- (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.~~ 1.7.E. Every five years the staff shall analyze previous projections to determine the accuracy of the methodology and improve on it for future projections.”

Staff analysis of proposed text amendments to Sections 1.7.D and 1.7.E: Sections 1.7.D. and 1.7.E as they are currently written are related to the Population Technical Bulletin, and the applicant proposed changes to Policy 4.1D.2, *Population technical bulletin*, discussed earlier in this report (see page 25). The applicant should ensure that the proposed text changes quoted above do not create any internal inconsistencies with other Plan policies. Additionally, peak population is used for calculating weighted average population and is used for Level of Service calculations. Therefore, the text in Section 1.7.D above should not be deleted.

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 recommends denial of this proposed 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 for expansion of the Primary Urban Service District.
- Proposed amendments to Policy 4.1D.2 conflict with Florida Statutes that require medium EDR population projections and estimates be used.
- Proposed amendments to Section 1.7.A, Section 1.7.B, Section 1.7.C, Section 4.2A.(8), Section 4.2A.(9), Policy 4.1D.2, Policy 4.1D.3, Policy 4.1D.4, and Policy 4.1D.5 are not clear. Until a methodology is applied and words describing calculations become calculations, it is unclear the result.
- Elements of the proposed text amendments to the Population Technical Bulletin and residential capacity methodology would likely result in multiple internal inconsistencies within the text of the Comprehensive Growth Management Plan.

ATTACHMENTS:

- Application materials dated June 19, 2025, December 23, 2024, and March 26, 2024
- Residential Capacity Analysis, December 2023, Metro Forecasting Models
- Memos from Traffic Engineering Division (dated July 15, 2025) and Utilities and Solid Waste Department (dated August 2024)