



**Utility Waiver Per  
Comprehensive Growth Management Plan Policy 10.2A.8.9  
Three Lakes Golf Club**

**Revised Final Site Plan Application**  
December 21, 2022  
(rev. 4-20-23)

**EXISTING PROPERTY CHARACTERISTICS**

The 1,216-acre (+/-) subject property is located north of the Bridge Road/Kanner Highway intersection in Hobe Sound/Martin County Florida. The Three Lakes Golf Club project, which includes two 18-hole golf courses, practice facilities, comfort stations, maintenance barn and use of an existing house for the owners and guests, was approved by the County Commission on September 27, 2022 and is currently under construction.

The purpose of this revised final site plan application is to obtain approval of the permanent golf clubhouse and 14 accessory golf cottages along with supporting infrastructure improvements.

The existing project is consistent with the requirements applicable to a “by-right” golf course within the existing Agricultural future land use and AG-20A zoning district including the use of on-site wastewater treatment and disposal systems (i.e., septic tanks) not exceeding a cumulative flow of 2,000 gallons per day (gpd). The proposed revised final site plan is consistent with the existing zoning district requirements and the criteria in Comprehensive Plan Policy 10.2A.8.9 which allow an increase in the maximum cumulative flow to 5,000 gpd.

**SURROUNDING PROPERTY CHARACTERISTICS**

The property is surrounded by similar lands that also retain the Agricultural future land use designation and A-2 zoning district. Properties to the north along the west side of Kanner Highway have an Industrial land use designation and are located within a Free-Standing industrial Urban Service District.

**WATER AND WASTEWATER TREATMENT FACILITIES**

Water and wastewater treatment will be provided by way of an individual well and septic tank systems for the clubhouse buildings, cottages, comfort stations, maintenance and guardhouse building. These facilities will be permitted in accordance with the Florida Department of Health regulations and Martin County’s Comprehensive Plan policies for on-site sewage treatment and disposal facilities as analyzed below.

As per the attached septic tank master plan prepared by Bowman Engineers, the total project allocation is provided as follows:

<u>Building</u>	<u>Gallons Per Day (GPD)</u>
Clubhouse:	1,725
Maintenance:	660
Existing house:	580
North cottages:	600
South Cottages:	800
Comfort station:	200
TOTAL:	4,565

\*Clubhouse flow based on 60 members at 25 gpd and 15 employees at 15 gpd.

### **COMPREHENSIVE PLAN COMPLIANCE ANALYSIS**

Chapter 10, Sanitary Sewer Services Element, of the Comprehensive Growth Management Plan provides the following policy language:

*Policy 10.2A.8.1. No onsite sewage treatment and disposal system shall exceed a total site buildout flow of 2,000 gpd, except as described below and in Policy 4.13A.8(5). Total site buildout shall be as determined by the Florida Department of Health.*

*Policy 10.2A.8.9. For on-site sewage treatment and disposal systems outside the Primary Urban Service District, the BCC may waive the 2,000 gpd limitation set forth in Policy 10.2A.8.1. above, to the extent necessary for nonresidential or agricultural uses permitted by the future land use designation and zoning district, but in no event shall the waiver allow total site buildout flows to exceed 5,000 gpd.*

- a. In order to obtain a waiver of Policy 10.2A.8.1, a person must submit an application in a form prescribed by the County Administrator. The application must contain a concise statement by the applicant that justify a waiver of the 2,000 gpd flow limitation. The application must also contain written concurrence from the Florida Department of Health that the use to be served requires a system greater than 2,000 gpd total site buildout flow, but the system does not exceed 5,000 gpd total site buildout flow.*
- b. In granting the waiver, the Board may prescribe any appropriate maintenance conditions.*
- c. In granting the waiver, the Board's decision shall be based upon the particular circumstances of the application and shall not constitute a precedent for other waiver applications.*

### **JUSTIFICATION STATEMENT**

The county staff has acknowledged that the 1,216-acre subject property could be subdivided with individual home sites on minimum 20-acre agricultural parcels per the existing zoning district. Each lot or parcel would be entitled to a maximum 2,000 gpd onsite sewage treatment and disposal system (i.e. septic tank system). Based on the existing future land use and zoning, approximately sixty 20-acre lots could be developed on the property. This alternative development pattern could result in a maximum of 60 lots with a maximum total site buildout flow of 120,000 gpd.

### **PROPOSED PRIVATE GOLF CLUB**

The estimated sewage flow for the project is based on the standard estimated flow rates provided in Table I, Section 64E-6.008 of the Florida Administrative Code, which provides a flow rate of 25 gallons per day (gpd) for each member in a "typical" country club and a flow rate of 15 gpd per employee at maximum shift. Based on these criteria, the maximum flow for the project site is 4,765 gpd.

As per the approved final site plan and landscape plan, the construction of the proposed golf courses will include native landscape areas and 141 acres of manmade lakes with extended littoral and upland transition zones planted with native species. Less than half of the 1,216-acre site will require permanent irrigation and all of the irrigation water will be diverted from the St. Lucie Canal, tested for nutrients and stored on site in constructed lakes. These waters will be retained on site consistent with a 100-year storm event, and any water discharged during extreme events will have received water quality treatment prior to discharge. These golf course attributes, which enhance wildlife benefits and minimize irrigation and fertilizer use, would not otherwise be applicable if the property were developed in residential lots or agricultural parcels.

#### **FLORIDA DEPARTMENT OF HEALTH**

As per the attached email and meetings and discussions with the Florida Department of Health, the project meets FL-DOH requirements in 64E-6.002 for commercial wastewater flows being less than 5,000 gpd. Because these systems are considered “nonresidential”, annual inspections by the Florida Department of Health will be required.

#### **REQUIRED SETBACKS**

None of the proposed septic tank drain fields exceed the 2,000 gpd threshold, however the 200’ setback from wetlands and waterbodies has been met for all proposed systems.

#### **ECONOMIC IMPACT ON USE OF PROPERTY**

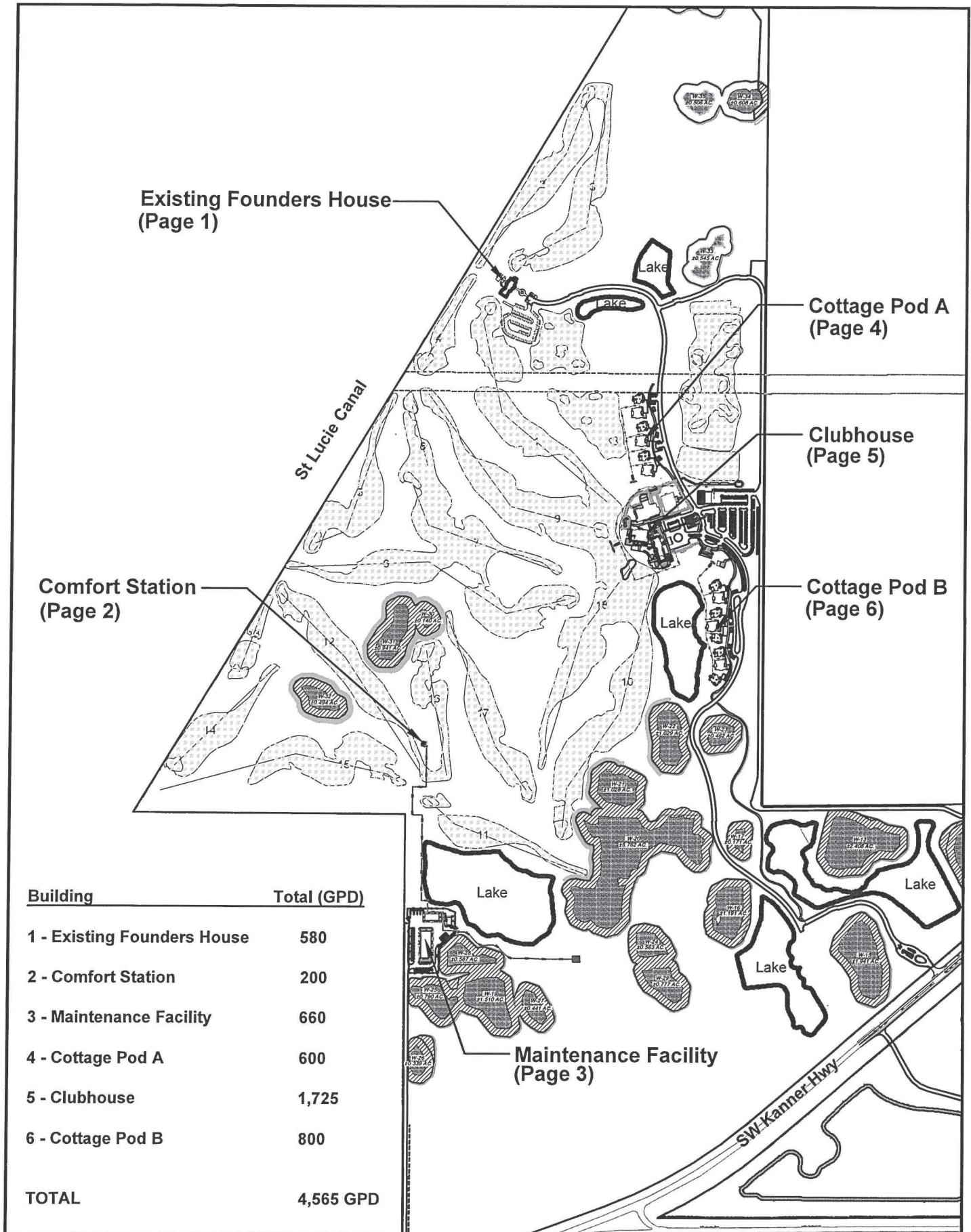
Applying the waiver provision to the property will allow reasonable and equitable use of the property as a private golf course. The development of a private golf course will eliminate the existing agricultural exemption and significantly increase the property’s taxable value.

#### **ENVIRONMENTAL IMPACT ON USE OF PROPERTY**

The alternative use of 60 home sites or maintaining agricultural uses on the property, does not provide greater environmental benefits, or increase protection of water quality, or minimize the potential negative impacts of septic tank systems. Construction of the golf course septic tank systems in accordance with the Florida Department of Health regulations and the specific waiver criteria in *Policy 10.2A.8.9*. will afford greater protection of water quality with added environmental benefits in the form of reduced water use and the construction of native landscape areas, lakes, littoral zones and native upland transition zones designed to meet or exceed current stormwater treatment requirements and enhance wildlife utilization.

#### **CONSISTENCY WITH THE COMPREHENSIVE GROWTH MANAGEMENT PLAN**

As documented in the final site plan application and confirmed in the staff report, the Three Lakes Golf Club is consistent with all elements of the Martin County Comprehensive Plan and the requirements of the Land Development Regulations. Based on this analysis and compliance with Florida Department of Health regulations, the proposed golf course qualifies for the waiver provision in *Policy 10.2A.8.9*. By all accounts, the project provides the best approach to protect and restore water quality in furtherance of the goals and objectives of Chapter 10, which is to eliminate and/or minimize the potential negative impacts caused by septic tank systems.

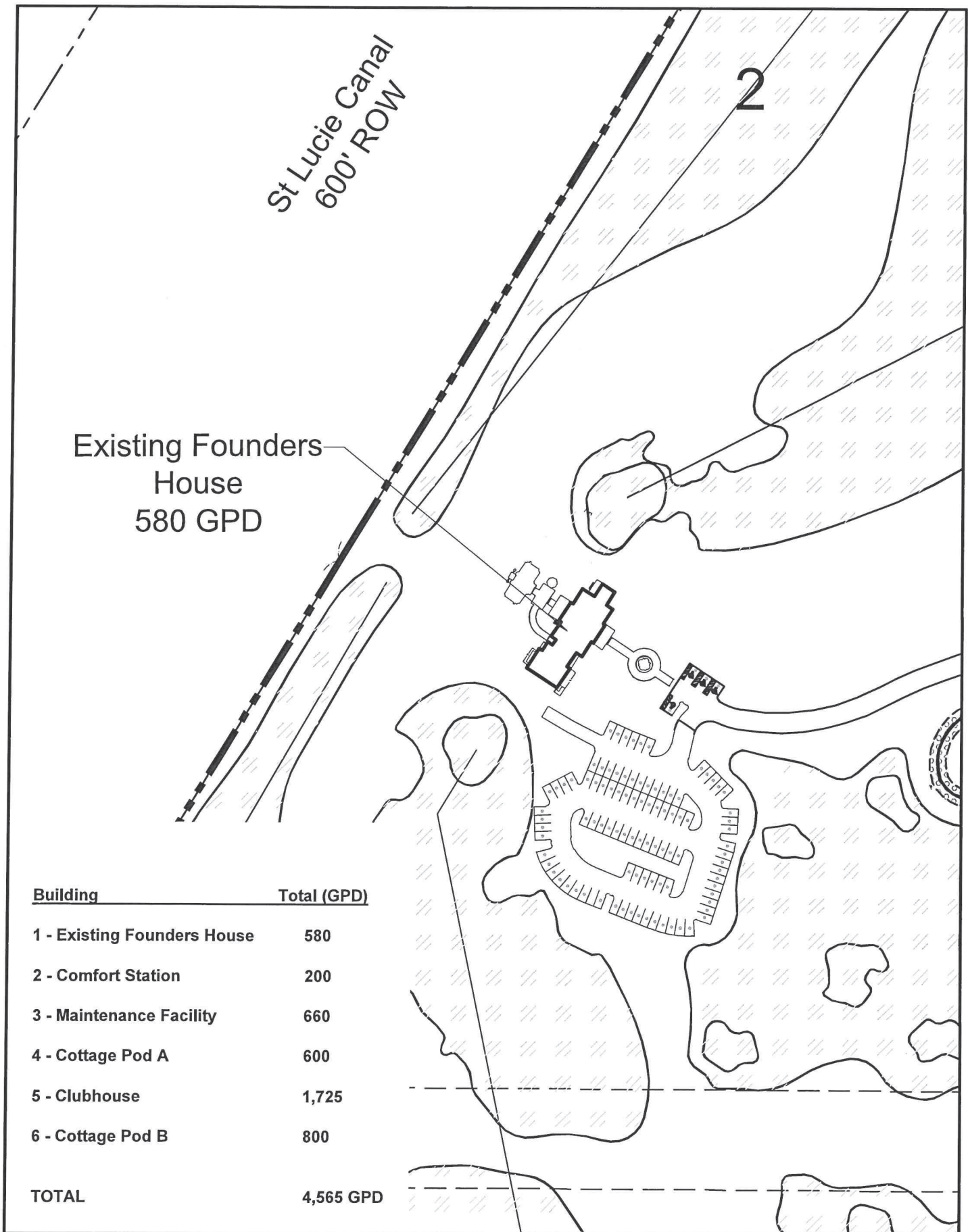


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Project Number 21-390  
Scale: 1" = 800'



## Three Lakes - Septic Drainfield Exhibit Location Plan

Martin County, Florida



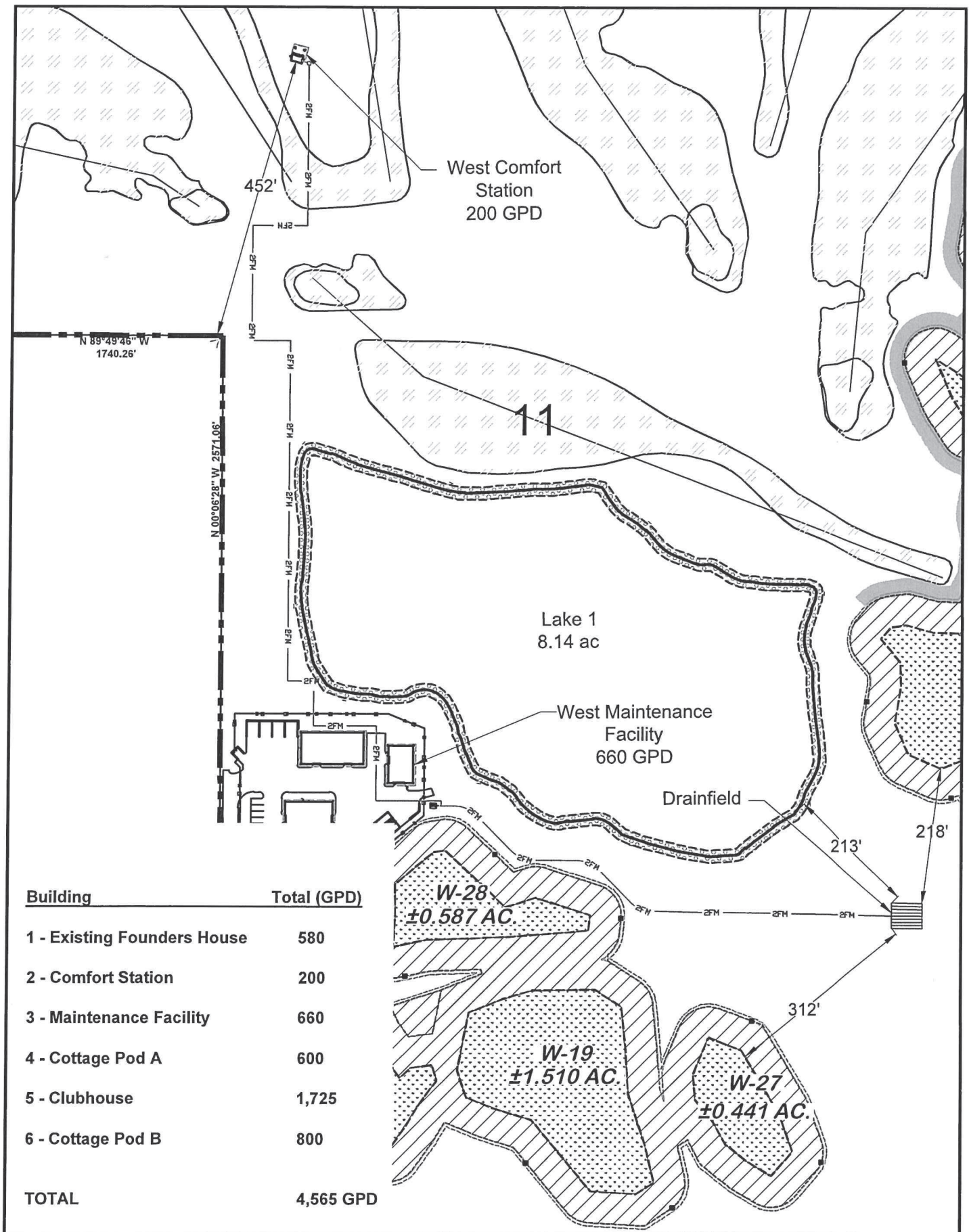
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## Three Lakes - Septic Drainfield Exhibit

### 1 - Existing Founder's House

Martin County, Florida

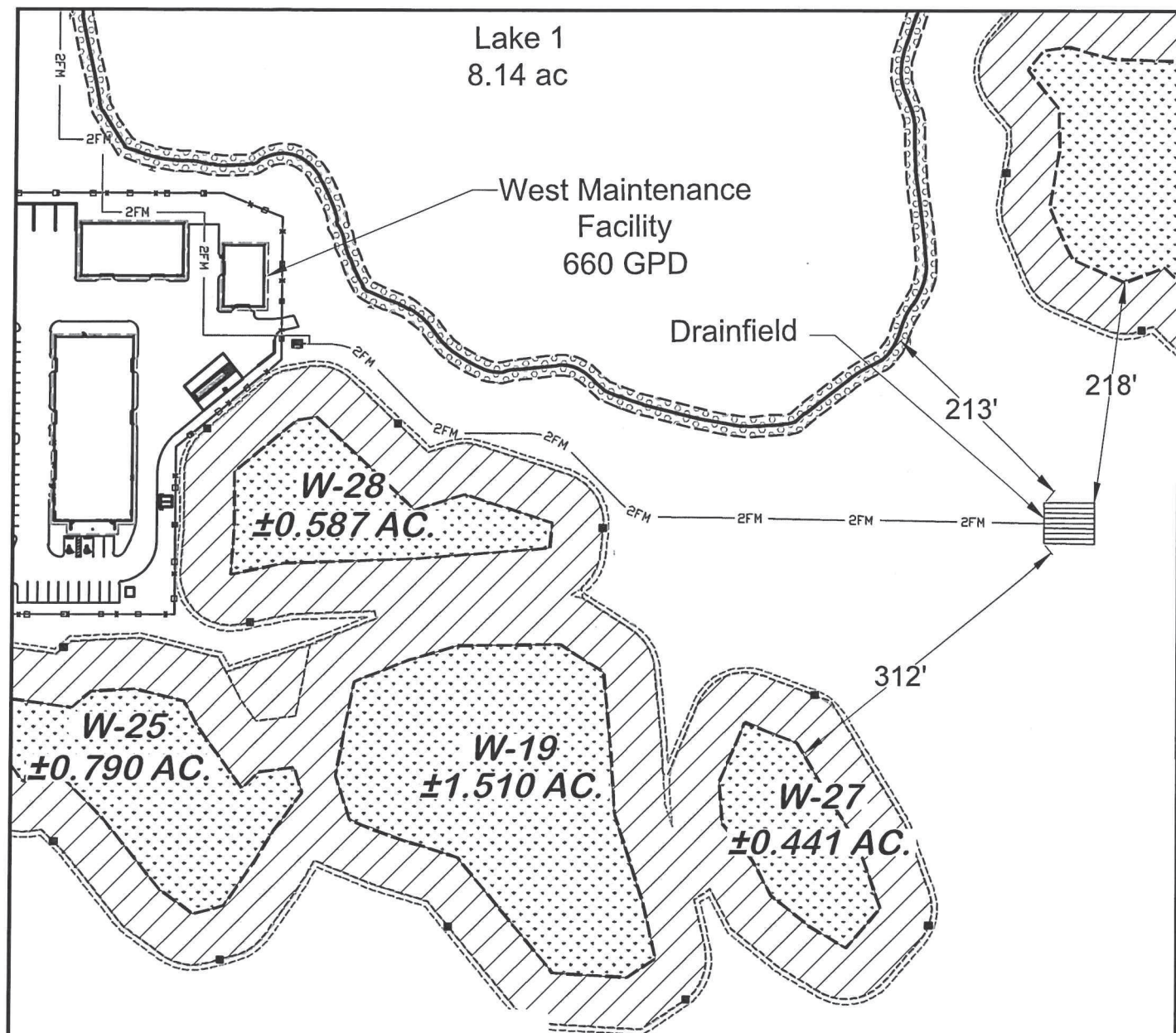


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## Three Lakes - Septic Drainfield Exhibit 2 - Comfort Station

Martin County, Florida



<u>Building</u>	<u>Total (GPD)</u>
1 - Existing Founders House	580
2 - Comfort Station	200
3 - Maintenance Facility	660
4 - Cottage Pod A	600
5 - Clubhouse	1,725
6 - Cottage Pod B	800
<b>TOTAL</b>	<b>4,565 GPD</b>

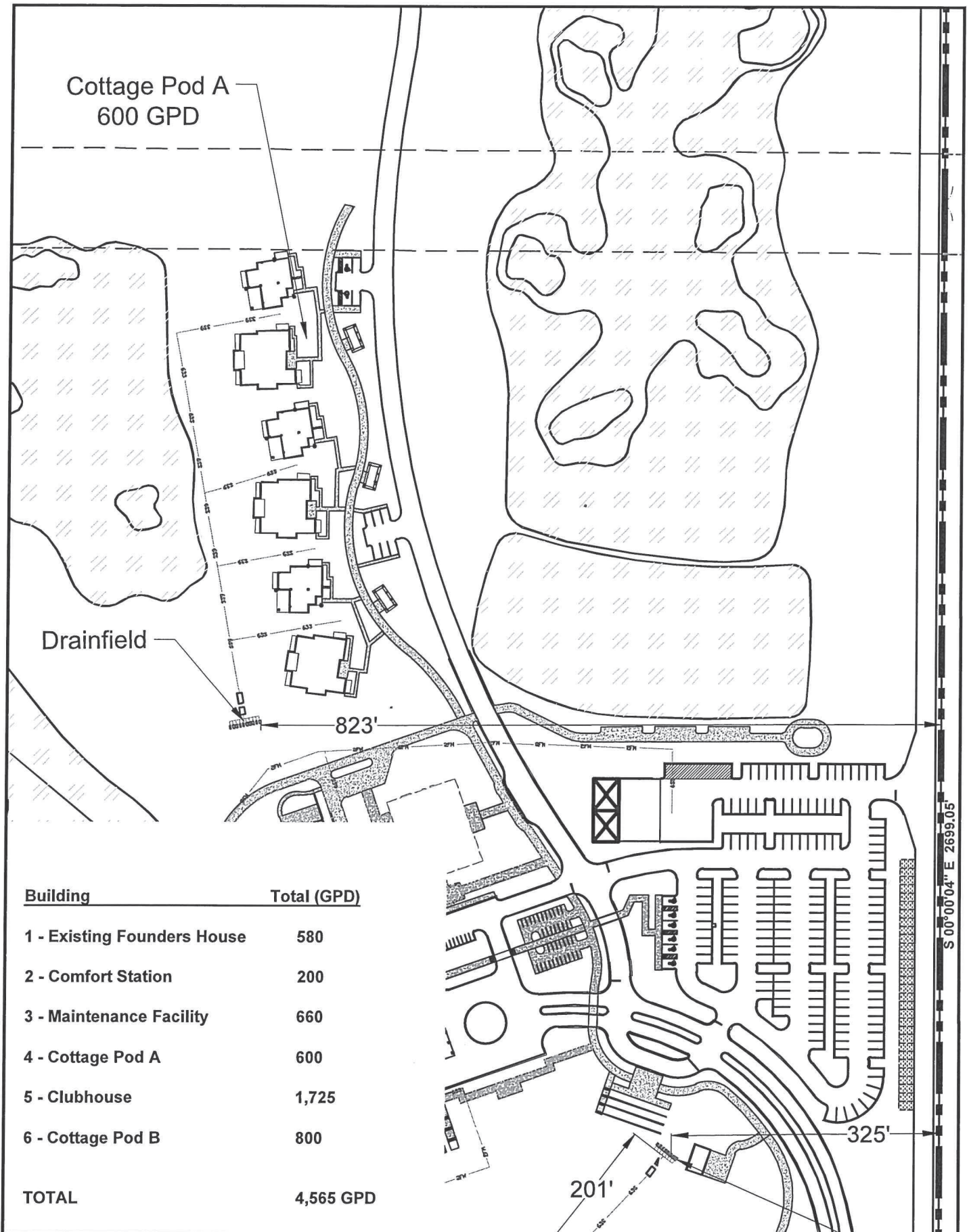
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## Three Lakes - Septic Drainfield Exhibit

### 3 - Maintenance Facility

Martin County, Florida



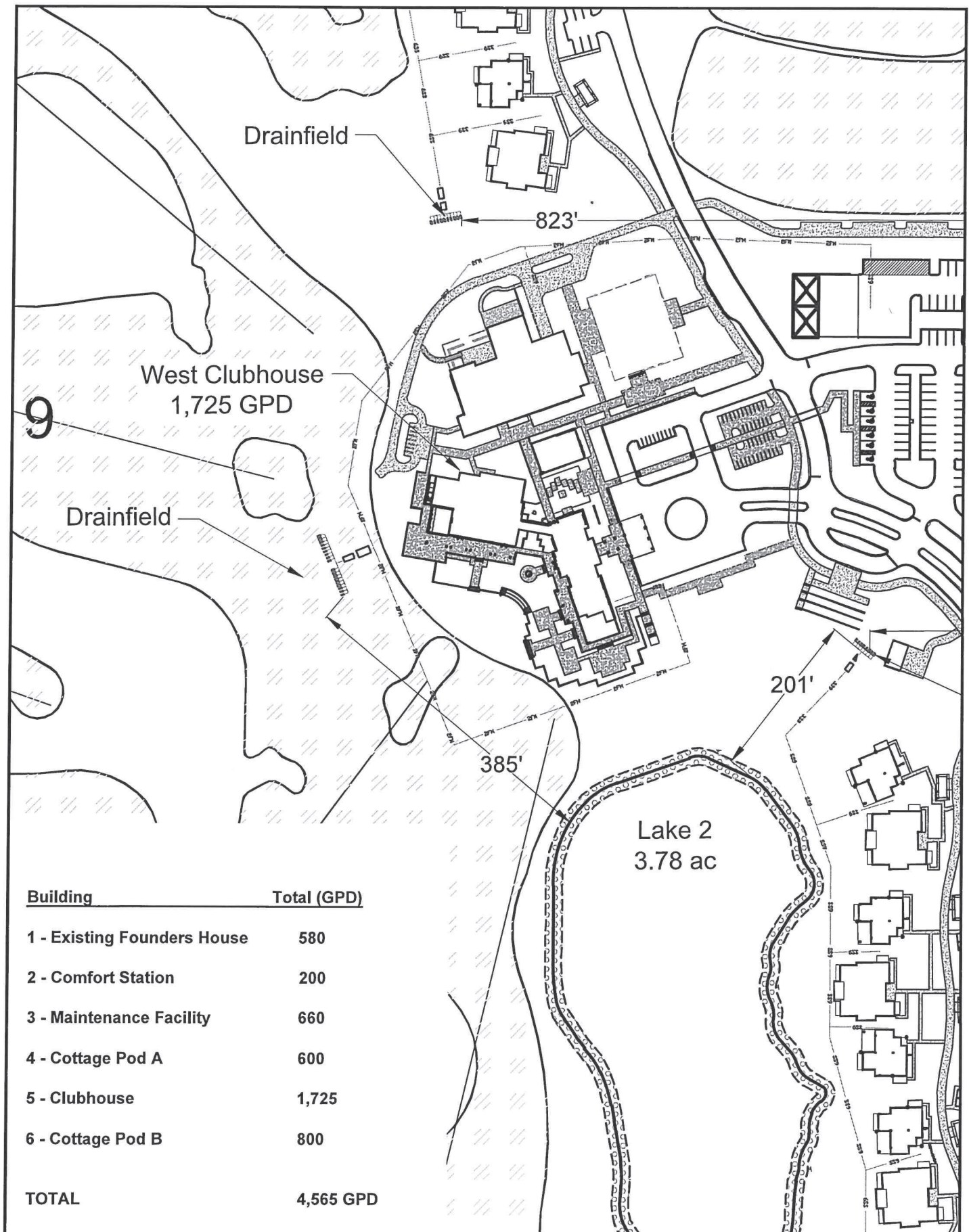
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## Three Lakes - Septic Drainfield Exhibit

### 4 - Cottage Pod A

Martin County, Florida

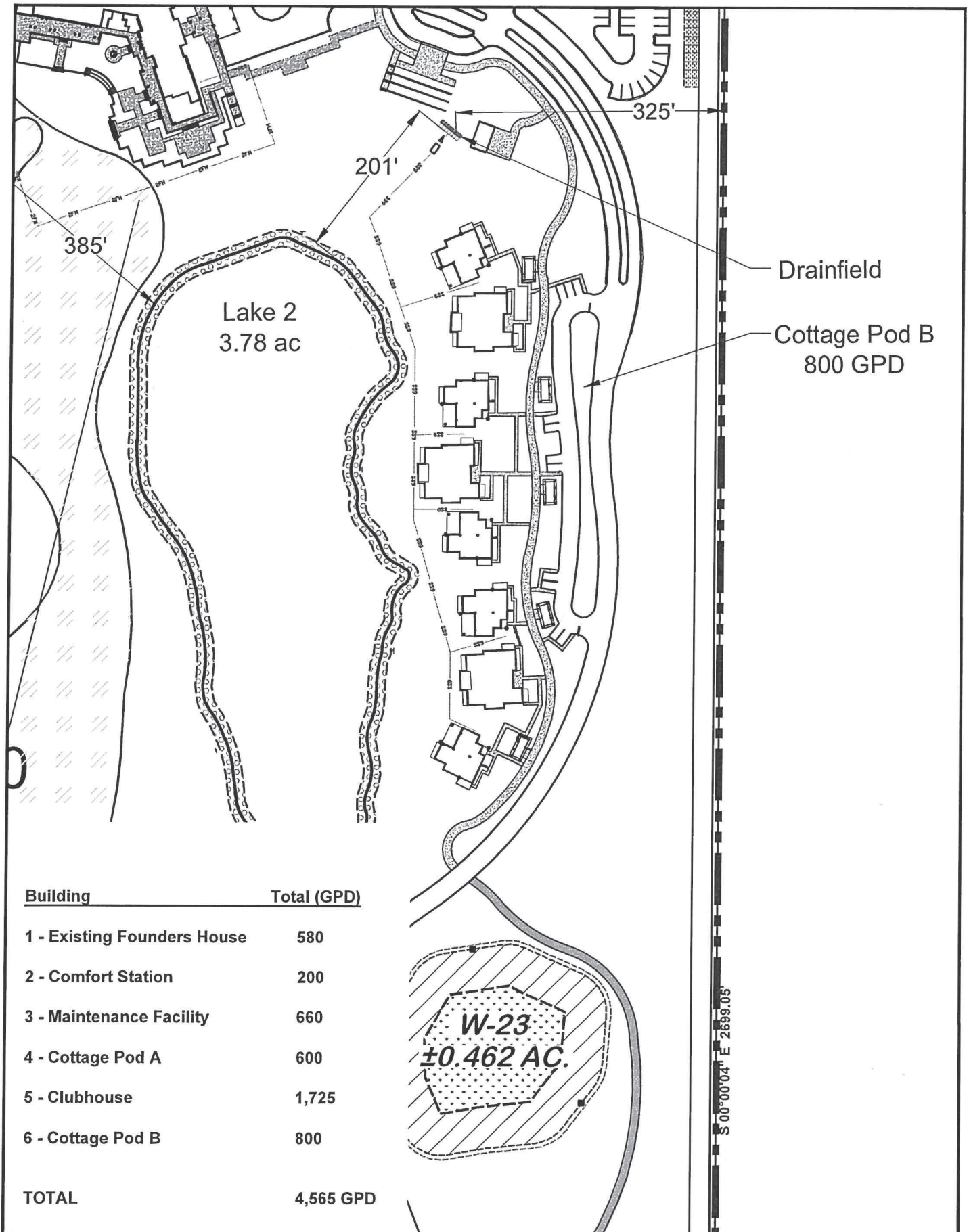


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## Three Lakes - Septic Drainfield Exhibit 5 - Clubhouse

Martin County, Florida



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Project Number 21-390  
Scale: 1" = 150'



## Three Lakes - Septic Drainfield Exhibit

### 6 - Cottage Pod B

Martin County, Florida

## Morris Crady

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**From:** Clifton, Nicholas L <Nicholas.Clifton@flhealth.gov>  
**Sent:** Monday, March 13, 2023 3:51 PM  
**To:** Morris Crady  
**Cc:** Loughran, Michael; Stemle, Paul C; Peter Walden; Spruce, Mike  
**Subject:** RE: Three Lakes Golf Club - Meeting Request

Good Afternoon,

We have no objections based on the information provided. The proposed sizing and master septic tank plan are consistent with Chapter 62-6 F.A.C and FS 381. Please let us know if any additional information is required.

Thank you,

Nick Clifton  
Environmental Health Manager  
Florida Department of Health in Martin County  
3441 SE Willoughby Blvd  
Stuart, FL 34994  
772-221-4090

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**From:** Morris Crady <mcrady@lucidodesign.com>  
**Sent:** Monday, March 13, 2023 11:01 AM  
**To:** Clifton, Nicholas L <Nicholas.Clifton@flhealth.gov>  
**Cc:** Loughran, Michael <MLoughran@Related.com>; Stemle, Paul C <Paul.Stemle@flhealth.gov>; Peter Walden <pwalden@martin.fl.us>; Spruce, Mike <Mike.Spruce@kimley-horn.com>  
**Subject:** RE: Three Lakes Golf Club - Meeting Request

EXTERNAL EMAIL: DO NOT CLICK links or open attachments unless you recognize the sender and know the content is safe.

Good morning Nick...I hope all is well!

Per our meeting late last year, we submitted the attached utility waiver request and master septic tank plan to show the project is under the County's 5,000 gpd threshold.

One of the county's comments is to obtain confirmation from the Health Department that the flow calculations are consistent with Health Department criteria.

Please reply to this email accordingly or provide a direct response to Pete Walden.

Thank you very much for your help and cooperation.

Sincerely,

**Morris A. Crady, AICP**  
**Senior Partner**