



October 19, 2020

VIA E-MAIL

Paul Schilling, Director
Martin County Growth Management Department
2401 SE Monterey Road
Stuart, FL 34996

**Re: KL Waterside, LLC, CPA 19-5 and 19-6, Supplemental Data and Analysis To Support
Height Requirements for Logistics Companies
(Our ref. #20-310)**

Dear Paul:

On behalf of the property owner, KL Waterside, LLC, and Kolter Land Partners, please accept this correspondence and the enclosed materials as an itemized response to the attached supplemental memorandum dated October 7, 2020.

In response to the first paragraph, we have made the requested changes to Policy 4.13A.10, Policy 4.7A.14(9), Policy 4.7A.3(9) and Policy 4.7A.3.1(3) by adding a reference to the Ordinance that will include a legal description for the real property designated Industrial within the recorded warranty deed (See revised Comprehensive Plan Text Amendments dated 10-18-2020). The same language and reference to the Ordinance was added to Policy 4.1B.2(2).

All requested changes to the subsections within Policy 4.1B.2(2) have also been agreed upon and included in the revised text amendments.

The only remaining issue is subsection (f) regarding the maximum height of warehouse or distribution facilities, which are recognized in Martin County as targeted business industries. Based on the enclosed letter and attachments provided by Ford Gibson, Managing Director of Foundry Commercial, subsection (f) has been revised as follows:

(f) Notwithstanding Policy 2.1A.1(3) and Policy 4.13A.10, the maximum building height as measured from the finished floor of the front elevation (not including drop for truck loading docks/ramps) to the mean height between the roof deck at the parapet or exterior wall to the ridge of the roof for a warehouse or distribution facility shall not exceed 47'.

Data and Analysis

The data and analysis provided by Foundry Commercial identifies the market demand and relatively new industry standard for top tier warehouse/distribution or logistics companies that are in the process of expanding their capacity. In contrast to traditional warehouses (which primarily offer longer term, bulk storage), e-commerce distribution centers are full-service, automated fulfillment centers. Modern reach trucks and robotics systems enable the efficient use of vertical space, thereby enabling logistics centers to handle the variety and quick turns of e-commerce inventory. Market trends indicate these companies are seeking to hire over a 100,000 employees and construct millions of square feet of new warehouse buildings in strategic locations within the next 12 months. Construction of an efficient, cost-effective building is the final determining factor.

Construction technology and automated racking systems have evolved over the past 10 years to allow more efficient construction and operation of these types of targeted businesses. To maximize utilization of vertical storage space, these companies require clear ceiling heights between 32 and 40 feet. Clear ceiling heights between 34 and 40 feet cannot be accommodated within Martin County's 40 feet building height. Based on the county's measurement of height, an additional 7 feet of non-usable, non-habitable roof structure is necessary to achieve these clear ceiling heights. To effectively compete with surrounding jurisdictions, which can already accommodate these heights for the top-tier logistics companies, Martin County must be willing to update their height restrictions based on current industry standards.

Current Exceptions to Height

The following exceptions are provided in the Land Development Regulations:

Section 3.14.B. The following are exceptions to the maximum height standards set forth in Table 3.12.1:

1. Steeples, spires and belfries on places of worship provided such structures do not exceed 60 feet in height, are part of a principal building, and are not used for human occupancy.
2. Roof structures including chimneys, parapet walls not over four feet high, tanks and supports, elevator machinery or shafts, penthouses used solely to enclose stairways and air conditioning equipment, provided that such structures do not exceed ten percent of the roof structure measured on a horizontal plane, are not used for human occupancy, and provided that the use of such structure does not exceed the district height requirements by more than eight feet.
3. Utility poles and support structures.
4. Lighting structures for public park facilities provided a lighting plan which utilizes the latest technology to minimize any stray light impacts has been approved by the Board of County Commissioners.
5. Nonhabitable structures used exclusively for agricultural or industrial processes or for protective and emergency service uses may exceed the height limitation set forth in Table 3.12.1 by up to 50 percent, subject to approval of the Growth Management Director, provided that the resulting height is no higher than 60 feet. Such nonhabitable structures constructed after January 1, 2005, may be allowed to exceed 60 feet at the discretion of the Board of County Commissioners, provided that such development is approved by way of a major development pursuant to [article 10](#) of the Land Development Regulations. On parcels developed prior to January 1, 2005, where one or more such nonhabitable structures already exist at heights greater than 60 feet, modifications to these structures or the construction of similar structures on the same parcel may be approved by way of an administrative amendment pursuant to [section 10.14](#) of the Land Development Regulations despite any provision to the contrary in section 10.14.C.

6. Wireless telecommunication facilities are exempt from the height standards set forth in this Article provided that they are approved in accordance with [article 4, division 18](#), Wireless Telecommunication Facilities.

Similarity of Proposed Exception

Subsection 5 of the current Land Development Regulations (LDRs) above recognizes that some agricultural and industrial processes require certain structures that exceed the 40 feet height limit. Some agricultural and industrial projects that have been approved or constructed with these exceptions include the following:

- FPL Power Plant
- Caulkins Citrus Processing Plant
- Indiantown Co-Generation Plant
- Bay State Milling Company
- Floridian Natural Gas

Similar to these exceptions, the proposed amendment recognizes the specific industrial process and height requirements associated with sophisticated logistics companies. However, the proposed exception would apply to a warehouse building not a “nonhabitable structure” and be limited to only 7 feet. Rather than change the LDRs, the height exception will apply only to warehouse or distribution facilities within the Industrial land use on this property. This specific-use restriction along with the requirement to seek approval by way of a Planned Unit Development (PUD) will give the County the opportunity to fully evaluate the costs and benefits of future applications and prevent applications that may result in any unintended consequences.

With this understanding, please find enclosed the following materials:

- Revised Comprehensive Plan Text Amendment Dated October 19, 2020;
- Letter from Ford Gibson of Foundry Commercial, which includes the following sections and attachments:
 - Industrial Clear Height Background
 - Competitive Analysis (St. Lucie, Palm Beach)
 - Recent Building Analysis
 - Ceiling Height Comparison Graphic
 - Copy of Legacy Park at Tradition Brochure;

Please accept these materials as additional data and analysis in support of the proposed text amendment. If you have any questions or comments, please feel free to contact me.

Sincerely,



Morris A. Crady, AICP
Senior Vice President
ENCL.

BCC MEETING DATE: October 13, 2020
AGENDA ITEM: PH-4

**MARTIN COUNTY, FLORIDA
SUPPLEMENTAL MEMORANDUM**

TO: Honorable Members of the Board of County Commissioners
DATE: October 7, 2020

VIA: Taryn Kryzda
County Administrator

FROM: Samantha Lovelady, AICP
Principal Planner

REF: 20-1112

**SUBJECT: LEGISLATIVE PUBLIC HEARING TO CONSIDER TRANSMITTAL OF
COMPREHENSIVE PLAN AMENDMENT (CPA) 19-5, KL WATERSIDE,
LLC, A TEXT AMENDMENT**

Staff has continued to review the text proposed by the applicant and has additional recommendations intended to clarify the meaning of the proposed text. The text provided in this supplemental memo replaces the recommendations in the staff report. The recommendations are not material changes to the text reviewed in the staff report. For instance, in Policy 4.13A.10 staff believes that the language proposed by the applicant and shown in black, should be changed to that shown in red.

The Industrial land use category on the tract of real property described in the Warranty Deed recorded in OR Book 3124, Page 1023, Public Records of Martin County, Florida, is hereby established as a Freestanding Urban Service District.

The tract of real property designated as Industrial on the Future Land Use Map and described as XXXX (industrial legal description) within the Warranty Deed recorded in OR Book 3124, Page 1023 is hereby established as a Freestanding Urban Service District.

Similarly, the proposed changes to Policy 4.7A.14(9), Policy 4.7A.3(9) and Policy 4.7A.3.1(3) reviewed on pages 13 and 14 of the staff report should read as follows:

The tract of real property designated as Industrial on the Future Land Use Map and described as XXXX (industrial legal description) within the Warranty Deed recorded in OR Book 3124, Page 1023.

Staff recommends that the language in Policy 4.1B.2(2), reviewed on pages 15 thru 18 of the staff report, should read as follows.

- (2) The Industrial development described as XXXX within of the tract of real property described in the Warranty Deed recorded in OR Book 22393124, Page 24981023, Public Records of Martin County, Florida, shall be restricted and managed as follows:
 - (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 maximum intensities of uses on the subject property contained within a building or buildings shall not exceed 1,600,000 square feet. 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).
- (e) ~~The maximum intensities of all uses contained within a building or buildings shall not exceed 500,000 square feet on the subject property (of which up to 25,000 square feet may be in marina uses) prior to December 1, 2015. A warehouse or distribution facility shall not exceed a building footprint of 1,050,000 square feet.~~
- (f) ***Staff cannot recommend approval of the text, as proposed in subsection (f).***
- (g) 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.

Finally, please see the attached public comment.

TK/sl
Attachments

Reviewed by County Attorney's Office.

CPA 19-5 (KL Waterside LLC)

Comprehensive Plan Text Amendments

(revised 10-19-2020)

(underlined text added, ~~strike thru~~ text deleted, highlighted for clarity)

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:

- (1) The tract of real property described in the Warranty Deed recorded at OR Book 2157, Page 2403, of the Public Records of Martin County, which is limited to 365,904 square feet of nonresidential use, consistent with the assigned future land use designation, and on which residential uses shall not be allowed.
- (2) The industrial development described in Ordinance XXX within of the tract of real property described in the Warranty Deed recorded in OR Book 22393124, Page 24981023, Public Records of Martin County, Florida, shall be restricted and managed as follows:
 - (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 maximum intensities of uses on the subject property contained within a building or buildings shall not exceed 1,600,000 square feet. 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 within the shall be processed as a Planned Unit Development (PUD).
- (e) ~~The maximum intensities of all uses contained within a building or buildings shall not exceed 500,000 square feet on the subject property (of which up to 25,000 square feet may be in marina uses) prior to December 1, 2015. A warehouse or distribution facility shall not exceed a building footprint of 1,050,000 square feet.~~
- (f) Notwithstanding Policy 2.1 A.1(3) and Policy 4.13A.10, the maximum building height as measured from the finished floor of the front elevation (not including drop for truck loading docks/ramps) to the mean height between the roof deck at the parapet or exterior wall to the ridge of the roof for a warehouse or distribution facility shall not exceed 47.
- (g) 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.

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 Seven Js Industrial Area (which covers the same area as the plat of Seven Js Subdivision, recorded in Plat Book 15, Page 97 of the Public Records of Martin County, Florida) is hereby established as a Freestanding Urban Service District. Any package wastewater treatment plants constructed in it shall be fully funded and maintained by the landowner.

The AgTEC future land use category is hereby established as a Freestanding Urban Service District.

The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. XXX within the Warranty Deed recorded in OR Book 3124, Page 1923, Public Records of Martin County, Florida, is hereby established as a Freestanding Urban Service District.

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

This provision shall not prohibit residences for night watchmen or custodians whose presence on industrial sites is necessary for security purposes. Such a use may be permitted through the Land Development Regulations.

Residential use is permitted in the Industrial future land use designation as part of a mixed-use project in a CRA, pursuant to Policy 18.2G.1. or Policy 18.3A.2.(1), except as restricted by the LDR.

Residential densities shall not exceed 15 dwelling units per acre and may be further limited in the LDR.

Based on the extensive impacts that industrial development frequently generates, industrial development shall be encouraged to develop under provisions of a PUD zoning district to give the applicant maximum design flexibility and to avoid major unanticipated adverse impacts.

The Land Development Regulations shall be amended to include performance standards for regulating the nuisance impacts sometimes associated with intense commercial and industrial development. Sites acceptable for development by limited impact industries shall contain a minimum of 15,000 square feet, maximum building coverage of 40 percent and maximum building height of 30 feet. Sites better suited for development by extensive impact industries shall have a minimum lot size of 30,000 square feet, maximum building coverage of 50 percent and maximum building height of 40 feet. Minimum open space for either use shall be 20 percent. The FAR shall be governed by the parking standards of the Land Development Regulations. Salvage yards shall be considered an industrial use due to the potential intensity and nature of the use, acreage requirements, aesthetic impact and associated heavy truck traffic.

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:

- (1) Jonathan Dickinson State Park, as contained in Policy 10.1A.7. and Policy 11.1C.10.;
- (2) Lots 67, 68, 75, 89, 90, 119 through 122 and lots 191 through 220 of Canopy Creek PUD (f/k/a Tuscawilla PUD as recorded in Plat Book 16, Pages 039-001 to 039-036, Public Records of Martin County, Florida).
- (3) Bridgewater Preserve as recorded in Plat Book 16, Pages 033-001 to 033-007, Public Records of Martin County, Florida. Any increase in residential density shall require approval by the Board of County Commissioners for a PUD Zoning Agreement and revised master/final site plan which is consistent with the Rural Density future land use designation and requires that the project connect to the existing potable water and sanitary sewer lines.
- (4) Seven J's Industrial Subdivision, as recorded in Plat Book 15, Page 97 and/or any replat or redevelopment of the property contained within the plat recorded in Plat Book 15, Page 97.
- (5) The County landfill, parcel number 07-38-40-000-00020-7.
- (6) Maringale Commons PUD f/k/a Palm City 95 PUD.
- (7) Sheriff's Shooting Range, parcel number 08-38-40-000-00011-0.
- (8) Parcel number 28-40-42-000-00020-5, parcel number 28-40-42-000-000-00040-1, parcel number 28-42-000-000-00011-0, and parcel number 21-40-42-004-000-00005-0 on S.E. Island Way.

(9) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. XXX within the Warranty Deed recorded in OR Book 3124, Page 1023, Public Records of Martin County, Florida.

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:

- (1) The Martin Correctional Institution, consistent with an interlocal agreement between Martin County, the City of Port St. Lucie and the Florida Department of Corrections for service to be provided by the City of Port St. Lucie.
- (2) The 107-acre parcel of County owned land located on the north side of SW Citrus Boulevard, approximately 2,000 feet east of the Indiantown airport, parcel number 03-40-39-000-00011-0 and parcel number 34-39-39-000-000-00021-0.

(3) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. XXX within the Warranty Deed recorded in OR Book 3124, Page 1023, Public Records of Martin County, Florida.

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.:

- (1) The County landfill, parcel number 07-38-40-000-000-00020-7.
- (2) The AgTEC land use category as set forth in Policy 4.13A.9.
- (3) Facilities in Jonathan Dickinson State Park, as set forth in Policy 10.1A.7. and Policy 11.1C.10.
- (4) Seven J's Industrial Area, as recorded in Plat Book 15, Page 97 and/or any replat or redevelopment of the property contained within the plat recorded in Plat Book 15, Page 97.
- (5) Maringale Commons PUD f/k/a Palm City 95 PUD.
- (6) Sheriff's Shooting Range, parcel number 07-38-40-000-000-00030-5.
- (7) Parcel number 28-40-42-000-000-00020-5, parcel number 28-40-42-000-000-00040-1, parcel number 28-42-000-000-00011-0, and parcel number 21-40-42-004-000-00005-0 on S.E. Island Way.
- (8) The 107-acre parcel of County owned land located on the north side of SW Citrus Boulevard, approximately 2,000 feet east of the Indiantown airport, parcel number 03-40-39-000-000-00011-0 and parcel number 34-39-39-000-000-00021-0.

(9) The tract of real property designated as Industrial on the Future Land Use Map and described in Ordinance No. XXX within the Warranty Deed recorded in OR Book 3124, Page 1023, Public Records of Martin County, Florida.

Dear Martin County Board of Commissioners

Our firm, Foundry Commercial, is working with KL Waterside, LLC to attract a high-end, sophisticated logistics user to Kolter's recently acquired, 500-acre site along Kanner Highway. To accomplish this goal, we need to secure an amendment to the Comprehensive Plan to (i) relocate the existing industrial zoning from the western side of the site, where it conflicts with nearby residential neighborhoods, to the eastern side of the site which offers more appropriate access along Kanner Highway, and (ii) increase the allowable clear ceiling height to accommodate the sophisticated racking technologies in these state-of-the-art warehouse and distribution facilities.

As a part of this amendment, we are focused on ensuring that the site will be well-positioned to attract the types of logistics tenants that will provide hundreds of jobs for the community. These tenants require certain building specifications to accommodate their efficient and sophisticated racking systems including state-of-the-art fire sprinkler systems, lighting systems, wide column spacing, and industry-leading clear, interior ceiling heights. A minimum clear ceiling height of 40 feet is particularly important to sophisticated logistics tenants because they plan their space usage in volume rather than floor area. In other words, a greater clear height provides greater volume over the same floor area and is therefore a more efficient use of space.

A review of Martin County code suggests that the maximum permitted height is 40 feet, which imputes a 33' interior clear height for large facilities. Because logistics users evaluate space usage on a three-dimensional basis, if we are unable to increase the maximum height to 47 feet to allow for 40-foot interior clear ceiling height, we will not be able to compete with other nearby municipalities, namely the City of Port St. Lucie's Tradition Commerce Center, which is not subject to the 40' height restriction. The increase in height to 47 feet, which is specific to warehouse and distribution facilities on this site only, will accommodate a clear ceiling height of 40 feet and allow the project to attract sophisticated logistics companies that will bring jobs with living wages and significantly increase the County's tax base.

We have assembled additional materials on the following pages to further explain how critical the 40' clear ceiling height is to these types of logistic companies. We look forward to continuing to work with you on this project.

Sincerely,



Ford Gibson
Managing Director

Industrial Clear Height Background

As mentioned in the introductory letter, logistics tenants analyze warehouse space in a three-dimensional manner. This means that they are evaluating, not only the floor area, but also the vertical area in which they can store goods – the more volume their building has, the more efficient their operation can be. Historically, the maximum volume (height) available to tenants has been limited by construction technology of the time. For example, as recently as 2000, an institutional-quality warehouse could reach just 24’ internal clear height, limited by the ability of the preferred tilt-wall construction to support a greater height.

Over the last 20 years, construction technology and best practices have gained considerably ground, and we are now able to construct buildings with internal clear heights as great as 40’ (and in some special circumstances, even higher). As a result, sophisticated logistics tenants have developed racking systems and material handling technology that can utilize the additional building volume to store additional product, thus making their operations more efficient – an example of these racking systems is depicted in the image above. The most sophisticated and largest tenants now require the ability to provide these tall internal clear heights so that they can maximize their efficiency.



Competitive Analysis

We have just kicked off our marketing efforts for the Kolter Site, and have identified our two direct competitors as “Legacy at Tradition” which is just north of the Martin County / St. Lucie County line along I-95, and Palm Beach Park of Commerce which is in northwestern Palm Beach County. We have reviewed the maximum allowable height for both projects and have concluded that both projects are able to provide internal clear heights of 40’. If we are unable to increase our internal clear height, we would be limited to about 33’ which compared to 40’ at our competitor’s location represents a 17.5% reduction in volume. Based on construction costs (which do not rise significantly in order to build a taller logistics facility), we will not be able to offer a significantly cheaper rental rate to these tenants, and consequently, we will not win any of these deals. This has further implications on the overall Kolter site as well. As a general rule, new sites in untapped markets like this one need large users first to validate the site before smaller users (who do not have the same clear height requirements) are willing to move in.

Foundry Commercial

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St. Lucie County

Maximum height by code is 35 feet, however, heights up to 75' are allowable via a PUD. In this manner, legacy at Tradition is able to offer internal clear heights of up to 40' and is marketing the property this way to potential users. We have included a snapshot of the proposed building specs to the right and have included the Offering Memorandum as an exhibit to this package.



Palm Beach County.

Maximum height by code is 35 feet, but this can be exceeded as the setback is increased on a one-for-one basis. In other words, if the minimum setback for industrial in Palm Beach County is 40 feet, if you increase the setback to 60 feet, you can utilize a maximum height of 55 feet – a twenty foot increase in setback allows a 20' increase in building height. If the property is adjacent to a residential use, the setback to maximum height relationship becomes 2-for-1. In a similar example, to reach a maximum height of 55 feet, the setback would need to be increase to 80 feet instead of 60 feet. As concrete evidence of the application of this code, Amazon is building a 1MM sf facility at Palm Beach Park of Commerce with an internal clear height of 40' (which imputes a maximum height as described by Palm Beach County code of 47'). A screenshot of this portion of Palm Beach County code is included below.

E. Building Height

The maximum height for buildings and structures in all districts shall be 35 feet, unless otherwise stated. [Ord. 2005-002]

1. Airport Zones

Structures in airport zones are subject to the height restrictions in [Art. 16.B.1, Airport Protection Zoning Regulations Governing Airport Hazards. \[Ord. 2017-025\]](#)

2. Multifamily, Non-Residential Districts, and PDDs

In the RM, CLO, CHO, CG, IL, IG, and PDD districts, buildings may exceed 35 feet in height as follows: Buildings over 35 feet in height shall be set back in accordance with [Table 3.D.1.A. Property Development Regulations \(PDRs\)](#), with one additional foot of setback to be provided in addition to the required setback for each one foot in height, or fraction thereof, over 35 feet. In the PO district, buildings over 35 feet in height shall provide one foot of setback, in addition to required perimeter landscape buffers, for each additional one foot in height or fraction thereof over 35 feet. This regulation shall have no effect on any existing structure within the PO district that is conforming as of the effective date of this Code. [Ord. 2005-002] [Ord. 2007-013]

c. Height

1) Maximum Height for Industrial and Commercial Development

When adjacent to an existing residential use, building height shall be limited to a maximum of 35 feet. The building height may be increased provided that two feet is added to all setbacks for each foot of building height above 35 feet. [Ord. 2004-051]

Recent Building Analysis

Sophisticated logistics users that provide the biggest impact on jobs, tax base, and are the best stewards of their properties require clear heights between 36' – 40' which are currently not permissible by Martin County Code. If we are unable to offer these clear heights, we will lose these deals to Tradition in St Lucie County and Palm Beach Park of Commerce in Palm Beach County – our two closes competitors – which are not subject to the same restrictions. Furthermore, tenants typically go through a site selection process before they determine their final building specs. This means that a user may not have determined whether they need 36 or 40-foot internal clear heights when they select a site. From a competitive standpoint, this means that if we cannot offer 40 foot clear heights, many tenants will pass over our site in favor of a competitor like Legacy at Tradition which offers up to 40' internal clear heights, even if the ultimate clear height ends up at 36 or 37 feet.

A list of recent developments for logistics users and the internal clear height (and estimated maximum height per Martin County Code) is included below. It is important to note that recently executed Build-to-Suits at both Tradition and Palm Beach Park of Commerce are included in this list. Both of those properties provide 40' internal clear heights. If we were to have competed for either of those deals, we would have lost based on the current code.

RECENT BUILD-TO-SUIT BUILDING SPECS					
Tenant	Location	Year	SF	Clear Height	Est. Max Height
Amazon	Homestead, FL	2021	1,011,000	37'	43'
Amazon	Jupiter, FL	2021	1,005,000	40'	46'
* Confidential	Port Saint Lucie, FL	2021	500,000	40'	46'
Amazon	Ocala, FL	2020	617,000	37'	43'
Home Depot	Hialeah Gardens, FL	2020	715,000	34'	40'
Amazon	Opa Locka, FL	2018	870,000	43'	49'
Averages			786,333	39'	45'

Foundry Commercial

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Speed of Execution

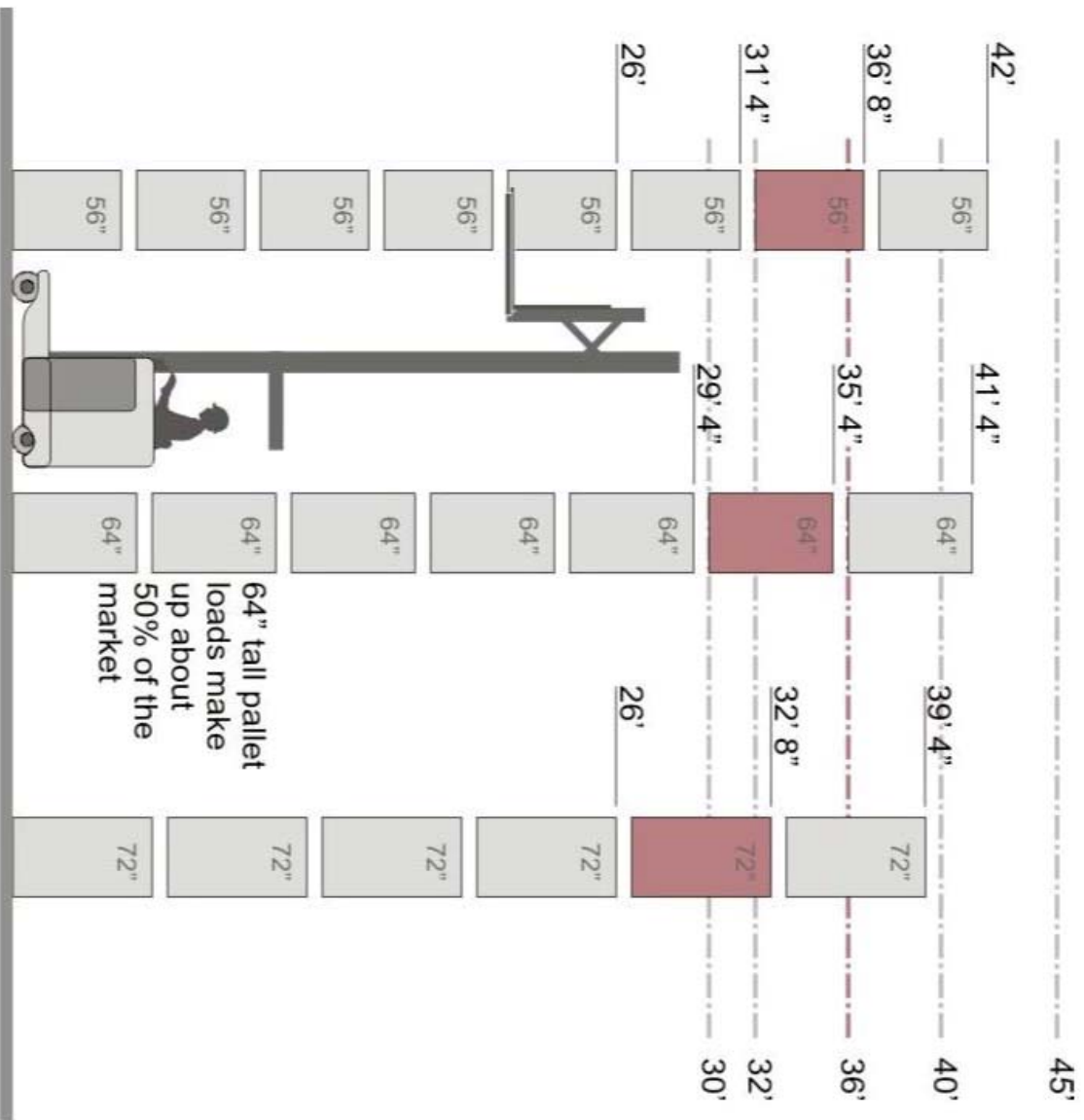
There is no restriction on maximum height in Palm beach or St Lucie counties and there are viable development sites in both. Because an adjustment to maximum height can only be achieved by going through the comp plan amendment process, tenants will not be willing to come to Martin County when they have more certainty and a six-month shorter timeframe in a neighboring county. In order to win these tenants and economic and job impact that they create, we must act now to provide building heights that will allow a sophisticated logistics user to locate in Martin County.

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CEILING HEIGHT COMPARISON



64" tall pallet loads make up about 50% of the market

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LEGACY PARK

A T T R A D I T I O N



For Lease or
Build-to-Suit



2021
Delivery



Quality Labor
Market



Immediate
Interstate Access



Highly Improved
Infrastructure



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SW Becker Rd at I-95 | Port St Lucie, FL



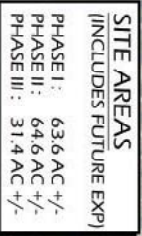
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CBRE

AVAILABLE NOW FOR LEASE OR BUILD TO SUIT



- + Institutional Class A Concrete Tilt Wall Buildings
- + New Construction Build-To-Suit Opportunity
- + +/-750,000 SF delivering 2021
- + 32' to 40' clear height
- + From 160' to 600' deep
- + Close Proximity To Amenities
- + Abundant Labor Supply
- + Major Distribution Neighbors:
- Wal-Mart (+/-1,200,000 SF), City Electric (+/-400,000 SF)



PROPERTY DETAILS

AND AREA INFORMATION



For Lease or
Build to Suit



Total Site Size of
+/- 300 Acres



Development Potential
of +/- 3.2M SF



Building Sizes Range
from +/-100k SF
to +/-1,000,000 SF



Direct Frontage and
Visibility Along I-95



Ideal for large box
distribution space to
service South Florida,
Central Florida and
the West Coast



Direct I-95 access via
SW Becker Road



Abundant Amenities

Tradition Community

The Tradition Center for Commerce is
Located in Port St. Lucie, Florida within
the Master Planned Community of Tradition

- + Port St. Lucie is the #1 Safest, Large City in Florida
- + Port St. Lucie is the Third Largest City in South Florida
- + 21 Miles of Pristine Beaches
- + 3,500+ Residences Built or Permitted in Immediate Area
- + Top in Nation for Millennials Buying Their First Home
- + Close to Cleveland Clinic, Keiser Univ.,
and City Electric

Prime Location

- + Pro-business environment
- + Expedited plan review, Fast Track Permitting,
Pro-growth Government
- + Very professional and aggressive local Economic
Development Council
- + Low Cost of Living with Most Affordable Housing
- + ZERO state income tax
- + 3 to 5 times faster population growth projections
for 2035 than any other South Florida County
- + Highway, rail and seaport connections

LOCATION / DEMOGRAPHICS

AND AREA INFORMATION

St. Lucie is the Best Location
for Large Distribution Users.

Key Industries

-  Distribution / Logistics
-  Pharma
-  Agriculture
-  Life Sciences
-  Aviation/Marine
-  Manufacturing

Demographics 2019

	15 Min	30 Min	45 Min	60 Min
Population	86,039	421,780	726,197	1,410,262
Households	30,380	166,366	294,133	574,630
HH Income	\$59,671	\$71,933	\$79,009	\$80,915
Median Income	\$40,995	\$51,674	\$53,125	\$54,221

Drive Time / Population Within

- 0-2 Hours 7,893,421 People
- 2-4 Hours 19,627,212 People
- 4-6 Hours 21,630,977 People
- 6-8 Hours 27,830,851 People
- 8-10 Hours 44,773,521 People



AREA AMENITIES



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