To: Council Members  

From: Staff  

Date: May 20, 2016 Council Meeting  

Subject: Local Government Comprehensive Plan Review  
Draft Amendment to the City of Port St. Lucie Comprehensive Plan  
Amendment No. 16-1ESR  

Introduction  

The Community Planning Act, Chapter 163, *Florida Statutes*, requires that the regional planning council review local government comprehensive plan amendments prior to their adoption. The regional planning council review and comments are limited to adverse effects on regional resources or facilities identified in the strategic regional policy plan (SRPP) and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. Council must provide any comments to the local government within 30 days of the receipt of the proposed amendments and must also send a copy of any comments to the state land planning agency.  

The amendment package from the City of Port St. Lucie contains a proposed change to the Future Land Use (FLU) Map and text changes to the FLU Element and Map Series in the comprehensive plan. This report includes a summary of the proposed amendment and Council comments.  

Summary of Proposed Amendment  

The proposed amendment is related to recent changes to the development orders of the Tradition Development of Regional Impact (DRI) and Western Grove DRI, which are located in the western portion of the City of Port St. Lucie. The Tradition DRI was originally approved in 2003 to include 7,245 residential dwelling units (DU) and 1,971,079 square feet (SF) of nonresidential uses on 2,522 acres. The Western Grove DRI, which is located directly west of the Tradition DRI, was originally approved in 2007 to include 4,062 residential DU and 616,810 SF of nonresidential uses on 1,593 acres. The Tradition DRI is partially developed and the Western Grove DRI is largely undeveloped. These DRIs are designated as New Community Development (NCD) on the FLU Map. The FLU Element indicates the New Community Development District shall be planned to incorporate a mixture of land uses, consistent with the densities and intensities authorized by the overall land use designation.
In 2015, each of these DRIs processed a Notice of Proposed Change, which, among other changes, transferred 348 acres from Tradition DRI to Western Grove DRI; reduced the total number of approved residential units in both DRIs by 1,017 DU from 11,307 to 10,290 DU; reduce the total amount of approved retail square footage in both DRIs by 368,810 SF from 2,358,810 SF to 1,990,000 SF; and removed Tradition Parkway and two east-west collector roads proposed to connect N/S Road A and Range Line Road in the Western Grove DRI.

The proposed amendment to the comprehensive plan includes the following changes:

1. Revise Policy 1.2.8.1 in the FLU Element to reduce the residential density in the Tradition/Western Grove NCD District from 11,307 to 10,290 DU and to reduce the non-residential intensity from 2,358,810 SF to 1,990,000 SF.

2. Revise the Tradition/Western Grove NCD Concept Land Use Plan Map in the FLU Element to: show land use sub-categories, including: Residential, Mixed Use, Town Center, Village Center, and Open Space Conservation/Open Space Recreation (OSC/OSR); show roads; revise sub-district acreages; and reduce the width of the buffer designated as OSC/OSR along Range Line Road. This buffer is proposed to be reduced from an average width of 500 feet to 50 feet in accordance with Policy 1.2.5.2.ii, which states: where less than 75 percent by coverage of native vegetation exists over the 500 foot wide area east of Range Line Road, the buffer zone shall be an average width of 50 feet with a minimum width of 30 feet.

3. Revise the FLU Map to reflect the reduction in buffer along Range Line Road from an average width of 500 feet to 50 feet. The land use designation of this area is proposed to be changed from Open Space Conservation/Open Space Recreation to New Community Development District. The comprehensive plan indicates that areas designated as Open Space Conservation are comprised of lands that should, to the maximum reasonable extent, maintain the natural character of the land; the Open Space Recreation designation applies to areas designated for existing or future parks.

4. Revise the Future Number of Lanes Map; Future Functional Class Map; Future Bike Lanes (2035) Map; Future Sidewalks (2035) Map; and Existing/Future Transportation (2035) Map. The revisions to these maps are proposed to be amended to remove the future segment of Tradition Parkway from N/S Road A to Range Line Road.

The amendment materials indicate the proposed changes are to provide and accommodate sufficient land area, unencumbered by roadways and related infrastructure, for development of a golf course residential community and to provide updates to the appropriate figures and maps in the comprehensive plan.

Regional Impacts

On October 14, 2015, Council staff sent a letter to the city that provided comments on the proposed changes to the DRI development orders (Exhibit 17). The comments indicated that additional regional impacts are not expected to be created by the transfer of acreage from the
Tradition DRI to the Western Grove DRI; reduction in residential density; reduction in retail square footage; and reduction in office square footage. However, the proposal to remove Tradition Parkway and two additional rights-of-way connecting N/S Road A and Range Line Road in the Western Grove DRI, have the potential to negatively impact regional resources and facilities.

The SRPP calls for a network of streets and a regional transportation system that integrates different modes of travel into one balanced system that supports community goals, enhances urban life, increases mobility, and provides for the safe and efficient movement of goods and people. The proposal to eliminate the right-of-way for Tradition Parkway and the two east-west collectors is inconsistent with the following regional policies:

**Policy 7.1.1.1**: Reserve and protect sufficient road right-of-way on the regional roadway network to provide for an efficient multi-modal transportation system.

**Policy 7.1.2.5**: Develop a regional roadway system of predictably spaced and interconnected east-west, north-south streets. Ideally, streets should be spaced every one-quarter to one-half mile to offer multiple route choices, disperse traffic, and discourage local travel on interstates and arterials.

**Policy 7.1.3.1**: Encourage patterns and forms of development and redevelopment that maximize public transportation alternatives, minimize the use of the region’s collector and arterial roadway network, and reduce the total amount of daily vehicle miles traveled.

**Policy 7.1.3.2**: Plan and design new development and redevelopment to provide complementary interconnections for pedestrians and public transportation within and between residential areas, schools, employment and retail centers, recreational areas and other public facilities.

**Extrajurisdictional Impacts**

Council requested comments on March 10, 2016 from local governments and organizations expressing an interest in reviewing the proposed amendment. Leslie Olson, Planning and Development Services Director for St. Lucie County, responded by sending a letter dated March 16, 2016, which indicates the proposed decrease in buffer from 500 feet to 50 feet may not be compatible with residential uses found within the city’s proposed designation of New Community Development District (Exhibit 18). The letter indicates that the western boundary of the Western Grove DRI is adjacent to 240 acres of property zoned Industrial Heavy by St. Lucie County. Heavy industrial operations currently near the Western Grove site include Liberty Tire Recycling, Allied New Technology, and Chem-Tex Supply Corporation. The remaining 180 acres are currently vacant awaiting similar heavy industrial development. St. Lucie County requested participation at the time of site plan development in order to ensure adequate set-backs are incorporated to reduce conflicts between the proposed residential uses and existing heavy industrial uses.
Also, the amendment package from the City of Port St. Lucie contains correspondence from Cynthia G. Angelos representing Allied New Technology and Chem-Tex Supply Corporation (Exhibit 19), and W. Lee Dobbins representing Liberty Tire Recycling (Exhibit 20) expressing concerns with the proposal to reduce the width of the buffer along Range Line Road. Both letters express a desire to have adequate set-backs incorporated into the Western Grove site plan to ensure future conflicts will not arise.

**Conclusion**

Council recommends the rights-of-way for Tradition Parkway and the two east-west collector roads connecting N/S Road A and Range Line Road remain in the comprehensive plan. These roads provide a strong framework for a well-defined network of streets. Ideally, the plan should have a network of streets spaced every ¼ to ½ mile to improve public safety and options for transit and other modes of transportation. Maintaining the existing rights-of-way for Tradition Parkway and the two east-west collectors provides a good basis for establishing a finer grain network of streets. Such a network will achieve a more sustainable community design and better-contribute to meeting the long-term transportation needs of this area of the city.

Also, Council recommends the City of Port St. Lucie work with St. Lucie County and representatives of the existing industrial businesses located on Range Line Road to incorporate adequate set-backs into the Western Grove site plan. A sufficient buffer is needed to ensure there will not be conflicts between the proposed residential uses in the Western Grove development and the existing heavy industrial uses located on the west side of Range Line Road.

**Recommendation**

Council should approve this report and authorize its transmittal to the City of Port St. Lucie and the Florida Department of Economic Opportunity.

Attachments
List of Exhibits

Exhibit

1. General Location Map
2. Policy 1.2.8.1 – Text Changes Showing Strikethrough and Underline
3. Tradition/Western Grove Concept Land Use Plan – Existing
4. Tradition/Western Grove Concept Land Use Plan – Proposed
5. Future Land Use Map – Existing
6. Future Land Use Map – Proposed
7. Future Number of Lanes Map – Existing
8. Future Number of Lanes Map – Proposed
9. Future Functional Class Map – Existing
10. Future Functional Class Map – Proposed
11. Future Bike Lanes (2035) Map – Existing
12. Future Bike Lanes (2035) Map – Proposed
13. Future Sidewalks (2035) Map – Existing
14. Future Sidewalks (2035) Map – Proposed
15. Existing/Future Transportation (2035) Map – Existing
16. Existing/Future Transportation (2035) Map – Proposed
17. Letter From Treasure Coast Regional Planning Council
18. Letter From St. Lucie County
19. Letter From Cynthia G. Angelos
20. Letter From W. Lee Dobbins
Exhibit 1
General Location Map

City of Port St. Lucie

Tradition/Western Grove Property
Policy 1.2.8.1: The density and intensity of the Tradition/Western Grove NCD District shall be limited to 11,307,10290 residential units, 2,358,840,1,990,000 non-residential square feet, 150 hotel rooms, and institutional, civic, recreation and accessory uses. The City may increase or decrease the above development units as may be provided for in an Equivalency Matrix adopted as part of an approved DRI Development Order.
Exhibit 3
Tradition/Western Grove Concept Land Use Plan - Existing
Exhibit 4
Tradition/Western Grove Concept Land Use Plan – Proposed
Exhibit 5
Future Land Use Map – Existing
Exhibit 7
Future Number of Lanes Map – Existing
Exhibit 8
Future Number of Lanes Map – Proposed
Exhibit 9
Future Functional Class Map – Existing
Exhibit 10
Future Functional Class Map – Proposed
Exhibit 11
Future Bike Lanes (2035) Map – Existing
Exhibit 12
Future Bike Lanes (2035) Map – Proposed
Exhibit 13
Future Sidewalks (2035) Map – Existing
Exhibit 15
Existing/Future Transportation (2035) Map – Existing
Exhibit 16
Existing/Future Transportation (2035) Map – Proposed
October 14, 2015

Ms. Patricia A. Tobin, AICP  
Director of Planning & Zoning  
City of Port St. Lucie Planning & Zoning Department  
121 SW Port St. Lucie Boulevard  
Port St. Lucie, FL 34984

Subject: Tradition Development of Impact Notice of Proposed Change  
Western Grove Development of Impact Notice of Proposed Change

Dear Ms. Tobin:

In accordance with the requirements of Section 380.06(19), Florida Statutes, Council has reviewed the Tradition Development of Regional Impact (DRI) Notice of Proposed Change (NOPC) and the Western Grove DRI NOPC. The NOPCs propose the following major changes:

- Transfer 348 acres from Tradition DRI to Western Grove DRI;
- Reduce the number of approved residential dwelling units (DU) in the Tradition DRI by 955 DU, from 6,945 to 5,990 DU;
- Reduce the number of approved residential DU in the Western Grove DRI by 62 DU, from 4,062 to 4,000 DU;
- Reduce the amount of approved retail square footage (SF) in the Western Grove DRI by 165,904 SF, from 365,904 to 200,000 SF;
- Reduce the amount of approved office square footage (SF) in the Western Grove DRI by 200,906 SF, from 250,906 to 50,000 SF;
- Revise the transportation conditions to reflect the developer is contributing its proportionate fair share of the improvements;
- Remove Tradition Parkway and two east-west collector roads proposed to connect N/S Road A and Range Line Road in the Western Grove DRI;
- Delete Condition 23 in the Western Grove DRI, which would have required roadway improvements to Range Line Road in Martin County under certain conditions;
- Delete Conditions 55-57 in the Western Grove DRI addressing the need for affordable housing; and
- Extend the buildout date from December 31, 2025 to March 2032 for the Tradition DRI and from March 26, 2030 to December 31, 2040 for the Western Grove DRI.
Council has reviewed the proposed changes and agrees that additional regional impacts are not created by the transfer of acreage from the Tradition DRI to the Western Grove DRI; reduction in residential density; reduction in retail square footage; reduction in office square footage; and extension of buildout dates. However, several of the proposed changes, such as the proposal to remove Tradition Parkway and two additional rights-of-way connecting N/S Road A and Range Line Road in the Western Grove DRI, have the potential to negatively impact regional resources and facilities.

The Strategic Regional Policy Plan calls for a network of streets and a regional transportation system that integrates different modes of travel into one balanced system that supports community goals, enhances urban life, increases mobility, and provides for the safe and efficient movement of goods and people. The proposal to eliminate the right-of-way for Tradition Parkway and the two east-west collectors is inconsistent with the following regional policies:

**Policy 7.1.1.1:** Reserve and protect sufficient road right-of-way on the regional roadway network to provide for an efficient multi-modal transportation system.

**Policy 7.1.2.5:** Develop a regional roadway system of predictably spaced and interconnected east-west, north-south streets. Ideally, streets should be spaced every one-quarter to one-half mile to offer multiple route choices, disperse traffic, and discourage local travel on interstates and arterials.

**Policy 7.1.3.1:** Encourage patterns and forms of development and redevelopment that maximize public transportation alternatives, minimize the use of the Region's collector and arterial roadway network, and reduce the total amount of daily vehicle miles traveled.

**Policy 7.1.3.2:** Plan and design new development and redevelopment to provide complementary interconnections for pedestrians and public transportation within and between residential areas, schools, employment and retail centers, recreational areas and other public facilities.

This issue is not resolved by a traffic analysis. It is related to establishing a strong network of interconnected streets in this western area of the city. To that end, Council recommends the rights-of-way for Tradition Parkway and the two east-west collector roads connecting N/S Road A and Range Line Road remain in the plan. These roads provide a strong framework for a well-defined network of streets. Ideally, the plan should have a network of streets spaced every ¼ to ½ mile to improve public safety and options for transit and other modes of transportation. Maintaining the existing rights-of-way for Tradition Parkway and the two east-west collectors provides a good basis for establishing a finer grain network of streets. Such a network will achieve a more sustainable community design and better-contribute to meeting the long-term transportation needs of this area of the city.
Attached correspondence from the Florida Department of Transportation (FDOT) also emphasizes the importance retaining Tradition Parkway in the plan. FDOT has recommended that the entire internal roadway network ultimately be constructed as originally planned to ensure the operational integrity of I-95 and its interchanges within this portion of the city.

Another concern with the Western Grove DRI NOPC is the proposal to delete Condition 23, which addresses roadway improvements outside the City of Port St. Lucie. Condition 23 requires roadway improvements to Range Line Road from Martin Highway to Becker Road when impacted by a specified trip threshold. This affects a segment of Range Line Road in Martin County, which is not mitigated by the developer paying its proportionate fair share of the improvements to the city. The NOPC states that Condition 23 is being deleted, because the project does not significantly impact Range Line Road south of Becker Road. However, if this holds true, then the specified trip threshold will not be reached. In order to ensure there is adequate mitigation for impacts to the regional roadway network in Martin County, Council recommends the city not delete Condition 23 from the Western Grove DRI development order.

An additional concern with the Western Grove DRI NOPC is the proposal to delete Conditions 55-57 addressing the need for affordable housing. A key element of these conditions is an agreement by the developer to provide voluntary support for affordable housing by means of a local condition. The deletion of these conditions will require individuals to unnecessarily drive a significant distance to obtain affordable housing. A diversity of housing types and affordabilities should be made available within the project site and western annexation area. The project should not rely on housing east of I-95 to serve the project. In order to ensure the issue of affordable housing is adequately addressed, Council recommends the city not delete Conditions 55-57 from the Western Grove DRI development order.

Please give full consideration to the comments from FDOT. Also, please copy Council on all correspondence concerning these NOPCs. If the development orders are amended, please transmit certified copies of the adopted development order amendments pursuant to these NOPCs.

If you have any questions please do not hesitate to contact me.

Sincerely,

Michael J. Busha, AICP
Executive Director

MJB/PGM:pgm

Attachments
cc: James Stansbury, Florida Department of Economic Opportunity
    Anne Cox, City of Port St. Lucie
    Roxanne Chesser, City of Port St. Lucie
    Leslie Olson, St. Lucie County
    Nicki van Vorno, Martin County
    Don Donaldson, Martin County
    Beth Beltran, Martin County MPO
    Steven C. Braun, Florida Department of Transportation
    Chon Wong, Florida Department of Transportation
    Steven D. Garrett, Authorized Agent
Mr. Michael J. Busha, AICP  
Executive Director  
Treasure Coast Regional Planning Council  
421 SW Camden Avenue  
Stuart, FL 34994

SUBJECT: Tradition Development of Regional Impact (DRI)  
Notice of Proposed Change (NOPC)  
City of Port St Lucie, St Lucie County

Dear Mr. Busha:

The Department has reviewed the submitted Notice of Proposed Change to the Tradition DRI, dated August 31, 2015. Tradition DRI is immediately east of Western Grove DRI, south of Crosstown Parkway, and north of SW Discovery Way. It is situated adjacent to the Western Annexation Area in the City of Port St Lucie, and has a current buildout date of 2025.

The Applicant is requesting the following changes:

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Approved Development Intensity</th>
<th>Proposed Change</th>
<th>Proposed Development Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential (d.u.)</td>
<td>7,245</td>
<td>-955</td>
<td>6,290</td>
</tr>
</tbody>
</table>

- Transfer 348 acres from Tradition DRI to Western Grove DRI;
- Reduce the number of approved residential dwelling units by 955, from 7,245 to 6,290 units;
- Via legislative action, extend the buildout date from December 31, 2025 to March 30, 2032.

In general, the Department has no comments concerning this NOPC dated August 31, 2015. No additional impacts are noted to occur to SIS roadways as a result of the proposed change.

However, the transfer of development rights for up to 955 dwelling units to Western Grove DRI, which is one of four DRIs that comprise the Western Annexation Area (WAA), and the subsequent changes to the WAA internal roadway network creates the potential for unmitigated transportation impacts upon the remaining roadway network. Further, interchange-to-interchange trips along I-95 may increase as a result of a not fully constructed internal roadway network west of I-95. To ensure

www.dot.state.fl.us
the operational integrity of I-95 and its interchanges within the study area, it is recommended that the entire internal roadway network ultimately be constructed as originally planned.

Please feel free to contact this office at (954) 777-4601 should you have any questions.

Sincerely,

Steven C. Braun, P.E.
District Planning and Environmental Engineer

SB: cw/rsh

cc: Lisa Dykstra – Transportation Planning Manager, FDOT
Amie Goddeau – District Modal Development Administrator, FDOT
Shi-Chiang Li – Systems Planning Supervisor, FDOT
Stacy Miller – Director of Transportation Development, FDOT
Carmen Monroy – Office of Policy Planning Director, FDOT
James Stansbury – Regional Planning Administrator, FDEO
Patricia Tozin – Director of Planning and Zoning, City of Port St Lucie
Chon Wong – Senior Transportation Specialist, FDOT
Mr. Michael J. Busha, AICP  
Executive Director  
Treasure Coast Regional Planning Council  
421 SW Camden Avenue  
Stuart, FL 34994

SUBJECT: Western Grove Development of Regional Impact (DRI)  
Notice of Proposed Change (NOPC)  
City of Port St Lucie, St Lucie County

Dear Mr. Busha:

The Department has reviewed the submitted Notice of Proposed Change (NOPC) to the Western Grove Development of Regional Impact (DRI), dated August 31, 2015. The Western Grove DRI is located west of I-95, east of Range Line Road, south of Crosstown Parkway, and north of SW Discovery Way. It is one of four DRIs (not including Tradition DRI) located in the Western Annexation Area of the City of Port St Lucie, and has a current buildout date of 2030.

The Applicant is requesting the following changes:

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Approved Development Intensity</th>
<th>Proposed Change for Western Grove DRI</th>
<th>Proposed Change from Tradition DRI</th>
<th>Proposed Development Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential (d.u.)</td>
<td>4,062</td>
<td>-1,017</td>
<td>+955</td>
<td>4,000</td>
</tr>
<tr>
<td>Retail (sq ft)</td>
<td>365,904</td>
<td>-165,904</td>
<td>0</td>
<td>200,000</td>
</tr>
<tr>
<td>Office (sq ft)</td>
<td>250,906</td>
<td>-200,906</td>
<td>0</td>
<td>50,000</td>
</tr>
</tbody>
</table>

- Transfer of 348 acres from Tradition DRI to Western Grove DRI;  
- Add 955 residential dwelling units previously approved in the Tradition DRI;  
- Reduce Western Grove's currently approved number of dwelling units by 1,017 units;  
- Reduce the amount of Retail square footage by 165,904 square feet;  
- Reduce the amount of Office square footage by 200,906 square feet;  
- Extend the buildout date 10 years, 9 months, and 5 days to December 31, 2040; and  
- Removing Tradition Parkway from the internal roadway network between N/S Road/Road “A” and Range Line Road.

www.dot.state.fl.us
As a result of the proposed changes, several Development Order changes are proposed. A few of the proposed changes will affect Strategic Intermodal System (SIS) facilities. Overall, the following comments are offered concerning the proposed NOPC for the Western Grove DRI.

1) The proposed new Condition #18 includes the following sentence: “City of Port St Lucie has no obligation to build the roadway improvements listed in Exhibit E.” Not building the complete Western Annexation Area Traffic Study (WATS) roadway network that was the basis of identifying the roadway improvements will result in unmitigated impacts to roadways, including I-95 and nearby interchanges, as traffic has fewer routes to complete their trips. Further, not building the WATS network will likely result in more interchange-to-interchange trips. It is recommended that the WATS roadway network of internal roadways ultimately be constructed as planned and analyzed in the traffic study.

2) The proposed new Condition #21 includes the following sentence: “...However, additional transportation mitigation beyond the required improvements listed in Tables 1 through 3 in this Development Order shall not be required of Developer as a result of this collaboration.” Referring to monitoring conditions on I-95 and at the interchanges, this condition effectively exempts the Developer from potentially having to improve conditions on an impacted SIS facility. This sentence should be stricken from the Condition. Such language is not present in the Development Orders of the other DRIs that comprise the Western Annexation Area, and FDOT in coordination with partners must preserve mobility on the SIS network, so this statement is not acceptable.

3) The submitted traffic analysis of 2040 conditions and roadway needs is summarized in Table 15. It indicates significant impacts along Crosstown Parkway and Tradition Parkway at their respective interchanges with I-95. Because roadway widening is needed for the cross streets to mitigate the DRI’s traffic impact, analyses of the ramp termini are necessary to ensure that the interchanges will operate acceptably and traffic will not spillback along the ramps to affect the I-95 mainline.

4) The proposed removal of Tradition Parkway from N/S Road/Range Line Road affects the internal circulation and traffic pattern of the Western Annexation Area. Drivers have fewer and different routes to complete trips than what the development order conditions are predicated. This could result in unmitigated traffic impacts to the remaining roadway segments, including I-95 and its interchanges. It is recommended that the WATS roadway network of internal roadways be constructed as planned and analyzed in the traffic study to avoid unrealized transportation impacts.

5) The buildout date for Western Grove DRI is proposed to be extended from 2030 to 2040. While partially based on legislative extensions, the Applicant acknowledges that the proposed buildout date greater than 7 years is presumed to be a substantial deviation. However, it is claimed that the submitted traffic analysis indicates there are no additional regional impacts associated with this proposed change.

It is noted that the original development order for Western Grove DRI had a buildout date of 2020. Through legislative action and proposed changes, the proposed buildout date would be 2040, or 20 years beyond the period analyzed in the original WATS. It is
recommended that SIS facilities, such as I-95 and its interchanges within the study area, be thoroughly analyzed for 2040 conditions to update and assess how they will operate with all of the proposed changes from the Western Annexation Area DRIs, adjacent DRIs (such as Tradition DRI), and recent land development.

Please feel free to contact this office at (954) 777-4601 should you have any questions.

Sincerely,

Steven C. Braun, P.E.
District Planning and Environmental Engineer

SB: ew/rsh

cc: Lisa Dykstra – Transportation Planning Manager, FDOT
Amie Goddeau – District Modal Development Administrator, FDOT
Shi-Chiang Li – Systems Planning Supervisor, FDOT
Stacy Miller – Director of Transportation Development, FDOT
Carmen Monroy – Office of Policy Planning Director, FDOT
James Stansbury – Regional Planning Administrator, FDEO
Patricia Tobin – Director of Planning and Zoning, City of Port St Lucie
Chon Wong – Senior Transportation Specialist, FDOT
March 10, 2016

Anne Cox, AICP
Assistant Director of Planning and Zoning
121 S.W. Port St. Lucie Blvd.
Port St. Lucie, FL 32399

Re: P15-144 Tradition Land Company, Proposed Comprehensive Plan Amendment, 16-1ESR

Dear Ms. Cox,

The subject transmittal package consists of a petition located adjacent to unincorporated land within the jurisdiction of St. Lucie County. The western boundary abuts 240 acres of property zoned Industrial Heavy (IH). The purpose of this zoning district is to provide an environment suitable for heavy manufacturing and other activities that may impose undesirable noise, vibration, odor, dust, or other offensive effects on the surrounding area together with such other non-residential uses as may be necessary to and compatible with heavy industrial surroundings (for a list of permitted and conditional uses, please see the attached Industry Heavy and Industrial Light zoning district use list). As such, the proposed decrease in buffer from 500 feet to 50 feet may not be compatible with residential uses found within the City’s proposed designation of New Community Development District (NCD).

Heavy industrial operations currently next door to the petition site consist of Liberty Tire Recycling, Allied New Technology and Chem-Tex Supply Corporation. The remaining 180 acres are currently vacant awaiting similar heavy industrial focused development. The County requests participation at the time of site plan development in order to ensure adequate set-backs are incorporated that will reduce potential conflicts between the proposed residential uses and existing heavy industrial uses.

Thank you,

Leslie Olson, AICP
Planning and Development Services Director

CC (via email):
Cynthia Angelos
Lee Dobkins
Treasure Coast Regional Planning Council
3.01.03 Zoning Districts

T. IL INDUSTRIAL, LIGHT.

1. Purpose. The purpose of this district is to provide and protect an environment suitable for light manufacturing, wholesale, and warehousing activities that do not impose undesirable noise, vibration, odor, dust, or other offensive effects on the surrounding area, together with such other uses as may be necessary to and compatible with light industrial surroundings. The number in "( )" following each identified use corresponds to the SIC Code reference described in Section 3.01.02(B). The number 999 applies to a use not defined under the SIC Code but may be further defined in Section 2.00.00 of this Code.

2. Permitted Uses:
   a. Business services. (73)
   b. Communications - including telecommunication towers - subject to the standards of Section 7.10.23 (48)
   c. Construction services:
      (1) Building construction - general contractors. (15)
      (2) Other construction - general contractors. (16)
      (3) Construction - special trade contractors. (17)
   d. Engineering, architectural and surveying services. (871)
   e. Commercial fishing. (091)
   f. Laundry, cleaning and garment services. (721)
   g. Local and suburban transit. (41)
   h. Manufacturing:
      (1) Food and kindred products. (20)
      (2) Tobacco products. (21)
      (3) Textile mill products. (22)
      (4) Apparel and other finished products. (23)
      (5) Furniture and fixtures. (25)
      (6) Printing, publishing and allied industries. (27)
      (7) Drugs. (283)
      (8) Leather and leather products. (31)
      (9) Glass:
         (a) Flat glass. (321)
         (b) Glass and glassware - pressed or blown. (322)
         (c) Glass products - made of purchased glass. (323)
      (10) Fabricated metal prod. - except machinery and transport. equip.:
         (a) Metal cans and shipping containers. (341)
         (b) Cutlery, handtools and general hardware. (342)
         (c) Heating equipment, except electric and warm air, and plumbing fixtures. (343)
         (d) Fabricated structural metal products. (344)
(e) Coating, engraving and allied services. (347)
(f) Miscellaneous fabricated metal products:
   (1) Wire products. (3495)
   (2) Misc. fabricated wire products. (3496)
   (3) Metal foil and leaf. (3497)
   (4) Fabricated metal products - NEC. (3499)
(11) Industrial/commercial machinery and computer equipment:
   (a) Metalworking machinery and equipment. (354)
   (b) Special industry machinery, except metalworking machinery. (355)
   (c) General industrial machinery and equipment. (356)
   (d) Computers and office equipment. (357)
(12) Electronic and other electrical equipment and components, except computer equipment:
   (a) Household appliances. (363)
   (b) Electric lighting and wiring equipment. (364)
   (c) Household audio and video equipment. (365)
   (d) Communications equipment. (366)
   (e) Electronic components and accessories. (367)
   (f) Misc. electrical machinery equipment and supplies. (369)
(13) Measuring, analyzing and controlling instruments. (38)
(14) Photographic, medical and optical goods. (38)
(15) Watches and clocks. (38)
(16) Misc. manufacturing industries:
   (a) Jewelry, silverware, and platedware. (391)
   (b) Musical instruments and parts. (393)
   (c) Dolls, toys, games and sporting goods. (394)
   (d) Pens, pencils, and other office and artists' materials. (395)
   (e) Costume jewelry, costume novelties, and notions. (396)
   (f) Brooms and brushes. (3991)
   (g) Signs and advertising displays. (3993)
   (h) Morticians goods. (3995)
   (i) Manufacturing industries, NEC. (3999)
(17) Plastic products - fabrication, molding, cutting, extrusion, and injection processing. (308)
   i. Marinas. (4493)
   j. Millwork and structural wood members. (243)
   k. Motion pictures. (78)
   l. Motor freight transportation and warehousing. (42)
   m. Repair services:
      (1) Automotive and automotive parking. (75)
      (2) Electrical. (762)
(3) Watch, clock and jewelry repair. (763)
(4) Reupholstery and furniture repair. (764)
(5) Misc. repairs and services. (769)

n. Retail trade:
   (1) Lumber and other building materials. (521)
   (2) Paint, glass and wallpaper. (523)
   (3) Hardware. (525)
   (4) Nurseries, lawn and garden supplies. (526)
   (5) Mobile home dealers. (527)
   (6) Automotive/boat/RV/motorcycle dealers. (55)
   (7) Gasoline service. (55)
   (8) Furniture and furnishings. (57)

o. Research, development, and testing services. (873)

p. Ship, boat building and repairing - less than forty-five (45) feet. (373)

q. Sorting, grading and packaging services - citrus/vegetables. (9723)

r. Vocational schools. (824)

s. Wholesale trade - durable goods:
   (1) Motor vehicle and automotive equipment. (501)
   (2) Furniture and home furnishings. (502)
   (3) Lumber and other building materials. (503)
   (4) Professional and commercial equipment/supplies. (504)
   (5) Metals and minerals except petroleum. (505)
   (6) Electrical goods. (506)
   (7) Hardware, plumbing and heating equipment, and supplies. (507)
   (8) Machinery, equipment, and supplies. (508)
   (9) Misc. durable goods:
       (a) Sporting and recreational goods. (5091)
       (b) Toys and hobby goods. (5092)
       (c) Jewelry, watches, precious stones and metals. (5094)
       (d) Durable goods NEC. (5099)

t. Wholesale trade - nondurable goods:
   (1) Paper and paper products. (511)
   (2) Drugs. (512)
   (3) Dry goods and apparel. (513)
   (4) Groceries and related products. (514)
   (5) Farm products - raw materials. (515)
   (6) Chemicals, and allied products. (516)
   (7) Beer, wine, and distilled alcoholic beverages. (518)
   (8) Misc. nondurable goods:
       (a) Farm supplies. (5191)
       (b) Books, periodicals and newspapers. (5192)
(c) Flowers, nursery stock and florists' supplies. (5193)
(d) Tobacco/tobacco products. (5194)
(e) Paints, varnishes and supplies. (5198)
(f) Nondurable goods, NEC. (5199)

u. Mobile food vendors. (999)
v. Single-family detached dwelling units provided that the single-family dwelling unit is located on an existing lot or parcel or record, as further defined in this Code, that was existing on or before August 1, 1990. (999)
w. Kennels. Allowed as a permitted use only when the property is surrounded by industrial uses or zoning and is five hundred (500) feet or more from residential uses or zoning. All distance requirements shall be measured from the nearest point of the existing home or area of single-family zoning to the nearest point of the proposed kennel.
x. Landscape and horticultural services. (078)
y. Personal services. (72)

3. Lot Size Requirements. Lot size requirements shall be in accordance with Section 7.04.00
4. Dimensional Regulations. Dimensional requirements shall be in accordance with Section 7.04.00
5. Offstreet Parking and Loading Requirements. Offstreet parking and loading requirements are subject to Section 7.06.00
6. Landscaping Requirements. Landscaping requirements are subject to Section 7.09.00
7. Conditional Uses:
   a. Airports, landing and takeoff fields - general aviation. (4581)
   b. Manufacturing:
      (1) Cut stone and stone products. (328)
      (2) Motorcycles, bicycles, and parts. (375)
      (3) Wood containers, wood buildings and mobile homes. (244/245)
   c. Ship, boat building and repairing (excluding ship or boat salvaging) - forty-five (45) to one hundred fifty (150) feet. (373)
   d. Wholesale:
      (1) Petroleum bulk stations and terminals.
   e. Scrap and waste materials - subject to the provisions of Section 7.10.12.A.
   f. Kennels. (0752) Other than those permitted under Section 3.01.03 T.2.w. of the Land Development Code.
8. Accessory Uses. Accessory uses are subject to the requirements of Section 8.00.00 and include the following:
   a. Co-generation facilities. (999)
   b. Fueling facilities. (999)
   c. Industrial wastewater disposal. (999)
   d. One detached single-family dwelling or mobile home for on-site security purposes per property. (999)
   e. Retail trade accessory to the primary manufacturing or wholesaling use. (999)
   f. Solar energy systems, subject to the requirements of Section 7.10.28.
U. IH INDUSTRIAL, HEAVY.

1. Purpose. The purpose of this district is to provide an environment suitable for heavy manufacturing and other activities that may impose undesirable noise, vibration, odor, dust, or other offensive effects on the surrounding area together with such other non-residential uses as may be necessary to and compatible with heavy industrial surroundings. The number in "( )" following each identified use corresponds to the SIC Code reference described in Section 3.01.02(3). The number 999 applies to a use not defined under the SIC Code but may be further defined in Section 2.00.00 of this Code.

2. Permitted Uses. Any use permitted in the Industrial Light (IL) zoning district:
   a. Agricultural services. (07)
   b. Construction services:
      (1) Building construction - general contractor. (15)
      (2) Other construction - general contractors. (16)
      (3) Construction - special trade contractors. (17)
   c. Docks and boathouses (private). (999)
   d. Engineering services. (871)
   e. Manufacturing:
      (1) Food and kindred products. (20)
      (2) Tobacco products. (21)
      (3) Textile mill products. (22)
      (4) Apparel and other finished products. (23)
      (5) Lumber and wood products, except furniture. (24)
      (6) Furniture and fixtures. (25)
      (7) Printing and publishing and allied industries. (27)
      (8) Chemicals and allied products:
         (a) Drugs. (283)
         (b) Soap, detergents and cleaning preparations; perfumes, cosmetics and other toilet preparations. (284)
         (c) Agricultural chemicals. (287)
      (9) Rubber and misc. plastic products. (30)
      (10) Leather and leather products. (31)
      (11) Glass:
         (a) Flat glass. (321)
         (b) Glass and glassware - pressed or blown. (322)
         (c) Glass products - made of purchased glass. (323)
      (12) Fabricated metal products (except ammunition and ordnance). (34)
      (13) Industrial/commercial machinery and computer equipment. (35)
      (14) Electronic and other electrical equipment and components, except computer equipment. (36)
(15) Transportation equipment. (37)
(16) Measuring, analyzing and controlling instruments. (38)
(17) Misc. manufacturing industries:
   (a) Jewelry, silverware, and platedware. (391)
   (b) Musical instruments and parts. (393)
   (c) Dolls, toys, games and sporting goods. (394)
   (d) Pens, pencils and other office and artists' materials. (395)
   (e) Costume jewelry, costume novelties, and notions. (396)
   (f) Brooms and brushes. (3991)
   (g) Signs and advertising displays. (3993)
   (h) Morticians goods. (3995)
   (i) Manufacturing industries, NIC. (3999)
(18) Paper and allied products:
   (a) Paperboard containers and boxes. (265)
       (b) Converted paper and paperboard products. (267)
   f. Local and suburban transit. (41)
   g. Water transportation. (44)
   h. Transportation services. (47)
   i. Communications. (48)
   j. Motor freight transportation and warehousing. (42)
   k. Motion pictures. (78)
   l. Membership organizations. (86)
   m. Personal and business services. (72)
   n. Research, development, and testing services. (873)
   o. Repair services:
      (1) Automotive and automotive parking. (75)
      (2) Electrical. (752)
      (3) Watch, clock and jewelry repair. (763)
      (4) Reupholstery and furniture repair. (764)
      (5) Misc. repairs and services. (769)
   p. Retail trade:
      (1) Lumber and other building materials. (521)
      (2) Paint, glass and wallpaper. (523)
      (3) Hardware. (525)
      (4) Nurseries, lawn and garden supplies. (526)
      (5) Mobile home dealers. (527)
      (6) Automotive/boat/RV/motorcycle dealers. (55)
q. Telecommunication towers - subject to the standards of Section 7.10.23. (999)

r. Wholesale trade - durable goods:
   (1) Motor vehicle and automotive equipment. (501)
   (2) Furniture and home furnishings. (602)
   (3) Lumber and other building materials. (503)
   (4) Professional and commercial equipment/supplies. (504)
   (5) Metals and minerals, except petroleum. (505)
   (6) Electrical goods. (500)
   (7) Hardware, plumbing and heating equipment, and supplies. (507)
   (8) Machinery, equipment, and supplies. (508)
   (9) Misc. durable goods:
      (a) Sporting and recreational goods. (5091)
      (b) Toys and hobby goods. (5092)
      (c) Jewelry, watches, precious stones and metals. (5094)
      (d) Durable goods NEC. (5099)

s. Wholesale trade - nondurable goods:
   (1) Paper and paper products. (511)
   (2) Drugs. (512)
   (3) Dry goods and apparel. (513)
   (4) Groceries and related products. (514)
   (5) Farm products - raw materials. (515)
   (6) Chemicals, and allied products. (516)
   (7) Beer, wine, and distilled alcoholic beverages. (518)
   (8) Misc. nondurable goods:
      (a) Farm supplies. (5191)
      (b) Books, periodicals, and newspapers. (5192)
      (c) Flowers, nursery stock and florists’ supplies. (5193)
      (d) Tobacco/tobacco products. (5194)
      (e) Paints, varnishes and supplies. (5198)
      (f) Nondurable goods, NEC. (5199)

t. Mobile food vendors. (999)

3. Lot Size Requirements. Lot size requirements shall be in accordance with Section 7.04.00.

4. Dimensional Regulations. Dimensional requirements shall be in accordance with Section 7.04.00.

5. Offstreet Parking and Loading Requirements. Offstreet parking and loading requirements are subject to Section 7.06.00.
6. Landscaping Requirements. Landscaping requirements are subject to Section 7.09.00.

7. Conditional Uses:
   a. Airport, landing and takeoff fields - general aviation. (4581)
   b. Manufacturing:
      (1) Paper and allied products. (26)
      (2) Chemicals and allied products. (28)
      (3) Petroleum refining and related products. (29)
      (4) Stone, clay, glass and concrete products. (32)
      (5) Primary metal industries. (33)
      (6) Ammunition and ordinance. (348)
   c. Natural or manufactured gas storage and distribution points. (492)
   d. Scrap, waste and land clearing and yard trash recycling operations - subject to the provisions of Section 7.10.12.
   e. Warehousing and storage services - stockyards. (999)
   f. Wholesale trade - nondurable goods:
      (1) Petroleum and petroleum products. (999)

8. Accessory Uses. Accessory uses are subject to the requirements of Section 8.00.00, and include the following:
   a. Co-generation facilities. (999)
   b. Fueling facilities. (999)
   c. Industrial wastewater disposal. (999)
   d. One (1) detached single-family dwelling or mobile home, for on-site security purposes per property. (999)
   e. Retail:
      (1) Bottled gas. (999)
      (2) Fuel oil. (999)
      (3) Gasoline service stations. (999)
      (4) Retail trade accessory to the primary manufacturing or wholesaling use. (999)
   f. Solar energy systems, subject to the requirements of Section 7.10.28.
February 19, 2016

DELIVERED BY EMAIL TO:  annec@cityofpsl.com

Anne Cox, Assistant Director of Planning and Zoning
City of Port St. Lucie
Planning and Zoning Department
121 S.W. Port St. Lucie Blvd.
Port St. Lucie, FL 34984-5099

RE: P15-144
Tradition Land Company, LLC
Comprehensive Plan Amendment Application Large Scale

Dear Ms. Cox,

I am writing on behalf of Allied New Technologies Inc. and Chem-Tex Supply Corp. (hereinafter referred to as Allied). Allied owns and operates a chemical manufacturing plant located at 9545 Rangeline Road, Fort Pierce, FL. The plant is located within 750 feet of the property which is the subject of the referenced application. Allied has been manufacturing sodium hypochlorite, commonly referred to as chlorine bleach, at its Rangeline Road facility since 1985. Allied completed construction of its new sixty million dollar Salt to Bleach Plant on this site in 2010. Allied’s property, and other properties along Rangeline Road, are zoned heavy industrial under the Saint Lucie County Zoning Code.

The subject application seeks a proposed change to the Future Land Use Map to modify the Open Space Conservation/ Open Space Recreation Designation buffer along Rangeline Road directly across from the Allied site. The application seeks to reduce the buffer from 500 feet to 50 feet. The area to be removed from the buffer is proposed to be designated as New Community Development District (NCD).
There is a concern with residential homes being developed literally directly across the street from two heavy industrial neighbors: Allied, a large, long-time chemical manufacturer, and Liberty Tire, a long-time tire recycler. We have discussed this concern with the Developer’s representatives and believe adequate set-backs can be incorporated to ensure the safety and well-being of the public. To that end, we thought it important that Council and staff be made aware of this issue, so that adequate set-backs will be incorporated in future plans.

Please place my office on the contact list for all future development applications on the property. We ask that this letter be provided to Council and accompany the proposed comprehensive plan amendment, if transmitted, to the Florida Department of Economic Opportunity and the reviewing agencies.

Respectfully,

THE LAW OFFICE OF CYNTHIA G. ANGELOS

s/ Cynthia Angelos
Cynthia Angelos

cc: Tradition Land Company
    Noreen Dryer, Esq.
    Steven D. Garrett
February 19, 2016

VIA EMAIL
Anne Cox
Assistant Director of Planning & Zoning
City of Port St. Lucie
121 SW Port St. Lucie Blvd.
Port St. Lucie, FL 34984-5099

Re: Tradition Land Company, LLC Comprehensive Plan Amendment Application – Large Scale
Project No. P15-144

Dear Ms. Cox:

This law firm represents Liberty Tire Recycling, LLC (“Liberty Tire”) which owns a tire recycling facility located on the west side of Range Line Road, immediately northwest of the Tradition Land Company, LLC property. It is our understanding that, at their meeting on Monday February 22nd, the City Council will consider the above-referenced comprehensive plan amendment, which will reduce the OSC/OSR buffer along Range Line Road from an average width of 500 feet to an average width of 50 feet. The width of the existing buffer varies and appears to be 800 or 900 feet wide where it is adjacent to Liberty Tire.

Liberty Tire employs approximately 115 people at their Range Line Road location, and the facility is valued at approximately $32 million dollars. The Range Line Road location has been operated as a tire recycling plant since 1988. The plant recycles tires through a process which creates noise and a fine powder, both of which have the potential to impact future residential neighbors, if their homes are built too close. It is for this reason that Liberty Tire’s facility is located on Range Line Road in an area which is an agricultural and industrial corridor. Liberty Tire does not wish to oppose the future development by Tradition Land Company, LLC on the east side of Range Line Road. However, Liberty Tire does wish to ensure that future residential development is planned in a manner that allows for both uses to coexist and that avoids the potential for nuisance claims to be brought against Liberty Tire and its industrial and agricultural neighbors. It is our hope that adequate set-backs can be provided between Liberty Tire and the future residences, so as to ensure that future conflict will not arise.
Anne Cox  
February 19, 2016  
Page 2

We have contacted the representatives of Tradition Land Company, LLC to seek a resolution for these concerns. In the meantime, please place this letter in the record for this project and provide a copy of it to the City Council. We also ask that it be included in the transmittal materials forwarded to Florida Department of Economic Opportunity and the Treasure Coast Regional Planning Council. Also, please add me to the notice list for any additional development approvals relating to the Tradition Land Company, LLC property.

Best regards,

W. Lee Dobbins

WLD:dl

cc: Noreen Drayer, Esq. (via email)  
Steve Garrett (via email)  
Wes McCurry (via email)  
Frank DeCarlo (via email)