



LETTER OF JUSTIFICATION

Club Med / Sandpiper Comprehensive Plan Amendment
October 7, 2025

REQUEST

On behalf of the Applicant, Altitude Prop Co LLC, KEITH and MPLD Consulting are requesting approval of a small-scale Comprehensive Plan Amendment (the “Amendment”) for approximately 42 acres for a project known as Sandpiper Bay PUD (the “PUD”) to better integrate academic, resort, and recreational uses under one future land use. The subject property is identified as Parcel # 4423-210-0001-000-3 (the “Parcel”). The Applicant wishes to amend the City of Port St. Lucie’s Future Land Map to change the Parcel’s current Future Land Use designation of Commercial Limited (CL), Residential Low (RL), and a portion of Open Space Recreational (OSR) to Commercial General / Institutional (GC/I).

SITE CHARACTERISTICS / PROPERTY LOCATION

The subject property is located at 3500 SE Morningside Boulevard in Port St. Lucie, Florida. The parcel consists of approximately 96.46 acres, of which 42 acres will be affected by the proposed Future Land Use Map amendment. The parcel is currently owned by Altitude Prop Co LLC. The subject parcel is comprised of five Future Land Use (FLU) designations: Commercial General / Institutional (CG/I), Commercial Limited (CL), Open Space Recreational (OSR), Open Space Preservation (OSP), and RL (Residential Low). It is important to note that the Residential Low designation traverses through the center of the parcel, splitting the resort’s future land uses. The subject property has a zoning designation of PUD. The subject property is also undergoing a City-initiated Future Land Use Map Amendment for portions of the academy area (See Exhibit H).

JUSTIFICATION

The current future land use amalgamation that controls permitted uses in the PUD has complicated reasonable development and flexible use of the property for the resort and academy. The petitioner wishes to consolidate the entire resort portion of the parcel to Commercial General / Institutional (GC/I) to have all resort and academy uses in the PUD under one land use category. The Open Space Recreational (OSR) area north of the resort portion of the resort will still maintain its recreational-oriented future land use designation. Along with this request, the Applicant is also requesting a PUD amendment to reflect the change of Future Land Use designations, consolidate uses under CG/I, and further define what recreational uses are allowed in CG/I and OSR. This request is not anticipated to cause

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any major impacts on the surrounding parcels and is compatible with surrounding future land uses.

This request is consistent with Objective 1.1.4 in the Future Land Use Element of the City of Port St. Lucie's Comprehensive Plan:

Objective 1.1.4 "Future growth, development and redevelopment should be directed to appropriate areas as depicted on the Future Land Use Map. The land use map should be consistent with sound planning principles including the prevention of sprawl; energy efficiency, natural limitations; the goals, objectives, and policies contained within this Comprehensive Plan; and the desired community character, and to ensure availability of land for future demand and utility facilities"

COMPREHENSIVE PLAN AMENDMENT REQUIREMENTS

Section 151.05 of the Port St. Lucie Land Development Code identifies the requirements for the proposal to amend the comprehensive plan map.

Environmental: An environmental assessment is not required as a part of this application as it is not a large-scale future land use amendment. The OSP Future Land Use and PUD currently and perpetually preserves a four (4) acre wetland area abutting the North Fork of the St Lucie River. The last PUD amendment approved in 2024 labeled the wetland area, shown in Figure 1, as a Mangrove wetland that "will continue to exist indefinitely as an undisturbed mangrove preserve area." This request will not affect the Mangrove Zone and the PUD will continue to preserve the wetland indefinitely.

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Figure 1, Approximate Wetland Preserve

The property's heavily developed nature after decades of being a resort with recreational facilities and a golf course makes it unlikely that a similar environmentally sensitive area would be present elsewhere.

Market Study: A market study is not required as a part of this application as the parcel already contains commercial future land uses.

Sewer / Water Service: St Lucie Water Services District (SLWSD) is the sewer / water service provider for the subject site and currently uses services provided from such district.

Parks / Open Space: This amendment will not result in any residential development, therefore not causing any impacts to park / open space concurrency.

Traffic: This is an existing commercial development. A traffic statement is included as part of this application. As stated in this statement, there will be no significant increase in traffic impacts as part of this request.

Stormwater: The site is within the City of Port St. Lucie and the stormwater management system is permitted through South Florida Water Management District. The proposed comprehensive plan amendment is not expected to result in a significant increase in stormwater drainage. Refer to the drainage statement attached for this requirement.

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Solid Waste: FCC Environmental Services is the provider for solid waste removal for this area. The proposed comprehensive plan amendment is not expected to result in a significant increase in the demand for solid waste.

Public School Concurrency: This amendment will not result in any residential development, therefore not causing any impacts to public school concurrency.

DESCRIPTION OF SUBJECT AREA

The subject area (the “Land Use Area”) for the comprehensive plan amendment is the area currently zoned as “CL”, “RL” and a portion of “OSR” on the future land use map within Parcel # 4423-210-0001-000-3. The land use area encompasses approximately 42 acres of the Parcel, as shown in Figure 2.

	Size in Square Feet	Size in Acres
Parcel “A”	4,181,760	96.46
Land Use Area “B”	~ 1,785,960	~ 41
City-Initiated Land Use Area “C”	~ 135,907	~3.12

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Figure 2, Schematic of Proposed Land Use Amendment

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SURROUNDING PROPERTIES

The following is a summary of the uses surrounding the Parcel, please review Exhibit C for a map version of this information.

	FLU Designation	Zoning District	Existing Use
North	Residential Low (RL)	Single-Family Residential Zoning District (RS-2)	Single-Family Residential
South	North Fork St. Lucie River	North Fork St. Lucie River	North Fork St. Lucie River
East	Residential Low (RL) & Medium Density Residential (RM)	Single-Family Residential Zoning District (RS-3), Multiple Family Residential (RM-11)	Single-Family Residential, Multi-family Residential
West	Residential Low (RL) & Medium Density Residential (RM)	Single-Family Residential Zoning District (RS-2), Multiple Family Residential (RM-11)	Single-Family Residential, Multi-Family Residential

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FUTURE LAND USE COMPARISON CHART

Current Future Land Uses			
	Commercial Limited (CL)	Open Space Recreational (OSR)	Residential Low (RL)
General Character & Uses	Commercial sites accessible to major thoroughfares near residential neighborhoods. Intended to provide essential household services with certain restrictions on more intensive uses such as gasoline stations, fast foods, automotive services, department stores, etc. as stipulated by the zoning code.	These areas are designated for existing or future parks.	A maximum density of 5.0 DUs per gross acre.
Density	N/A	N/A	1-5 du / acre
Max Land Coverage	40%	30%	50%
Max Height	35 ft	35 ft	N/A
Max Impervious Area	80%	80%	N/A
Proposed Future Land Use			
Commercial General / Institutional (CG/I)			
General Character & Uses	Commercial General: Accommodate general retail sales and services with restrictions on heavy vehicular sales, services, wholesale, warehouse uses, outdoor storage, or other nuisance uses. Commercial Institutional: Accommodate both public and private institutional sites such as schools, public buildings and libraries, government buildings and hospitals, childcare, various group home categories as well as other uses defined in the zoning code.		
Density	N/A		
Max Land Coverage	CG: 40% I: 30%		
Max Height	CG: 35/75* ft I: 35/75* ft		

**Within a PUD, greater than five acres, the maximum height permitted is 75 feet. All such height requests are contingent upon the approval of a master plan and elevation drawings which illustrate that the proposed height is compatible with the surrounding land uses. The applicant is required to provide adequate information to support the compatibility of the proposed taller structures with the surrounding land uses.*

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