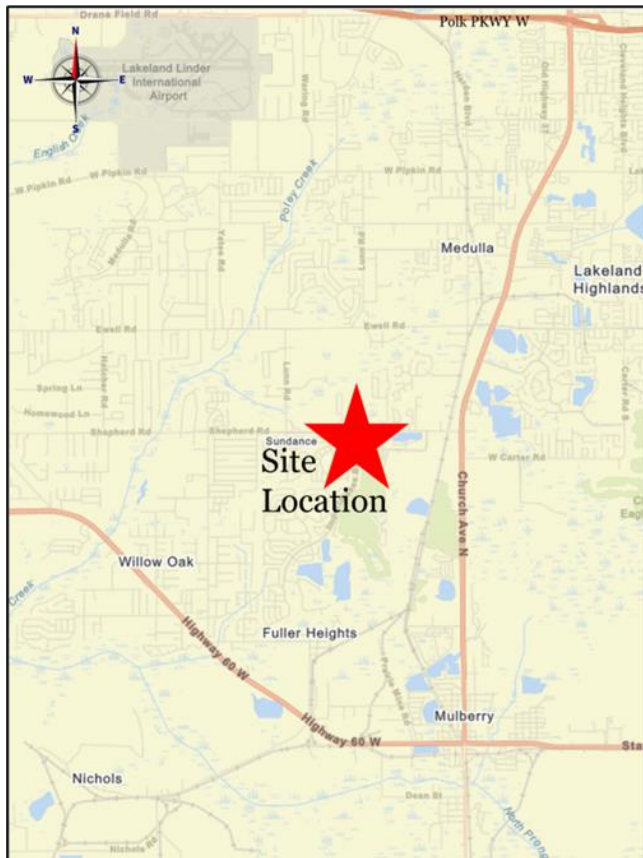


**POLK COUNTY
DEVELOPMENT REVIEW COMMITTEE
STAFF REPORT**

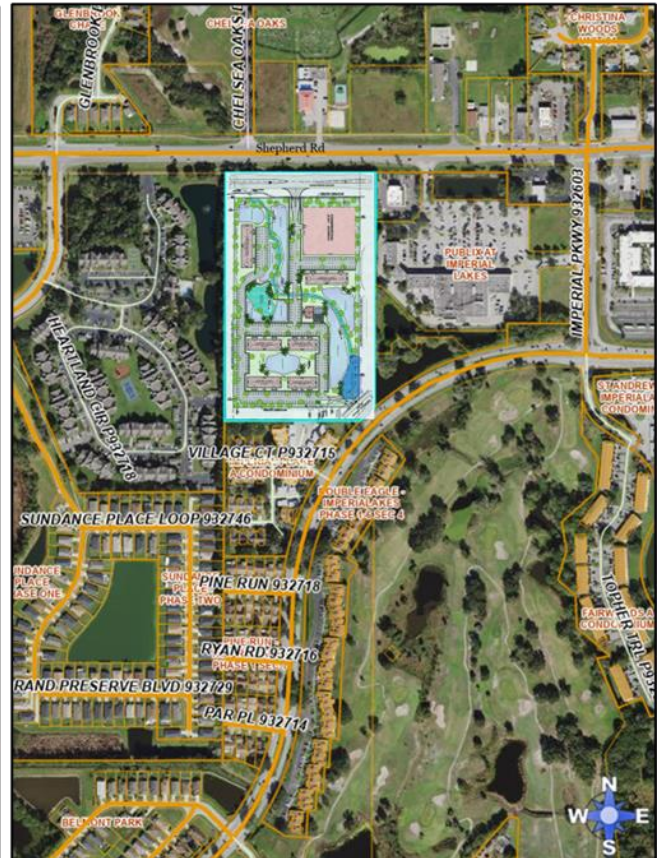
DRC Date:	March 28, 2024	Level of Review:	Level 3 Review
PC Date:	June 5, 2024	Type:	Planned Development
BoCC Date:	N/A	Case Number:	LDPD-2024-2
Applicant:	John McVay	Case Name:	Shepherd Rd multi-family
		Case Planner:	Malissa Celestine, Planner II

Request:	The applicant is requesting a Planned Development to construct 200 multifamily units in the Residential High (RH) land use district.
Location:	The subject property located South of Shepherd Road, north of Imperial Lakes Boulevard, north of Village Court, west of Imperial Parkway, east of Sundance Boulevard, west of State Road 37, north of the City of Mulberry, south of the City of Lakeland, Florida, in Section 27, Township 29, Range 23.
Property Owners:	GGAJAM Investments LLC
Parcel Number (Size):	±16.58 acres (232927-000000-011020) ±14.58 acres (Project Area)
Future Land Use:	Residential High (RH)
Development Area:	Urban Growth Area (UGA)
Nearest Municipality:	City of Mulberry
DRC Recommendation:	Conditional Approval
Planning Commission Vote:	Pending Hearing

Site Location



2023 Aerial with Site Plan



Summary:

LDPD-2024-2 is a Planned Development (PD) request to construct a 200-unit, multi-family midrise development on ±14.58 acres. The site is located in the Residential High (RH) land use district and the Urban Growth Area (UGA). According to Chapter 2, Table 2.1 of the Land Development Code (LDC), Multi-Family Developments within the RH district may be achieved via a conditional Level 2 review in accordance with LDC Section 303 (Multi-Family).

This request necessitates Planning Commission approval because the site is within the UGA and the maximum, by right density is 10 DU/AC. A Planned Development is required increase the density to 13.72 DU/AC. Had the site been located within the Transit Supportive Development Area (TSDA), the site would be eligible for 15 DU/AC with an approved Level 2 Review in accordance with LDC Section 303 multi-family and the development standards outlined in Chapter 7.

According to Chapter 3, Section 303 of the LDC, the Planned Development process is a mechanism for allowing project design flexibility and attaching conditions when warranted. This section further states, “*PD approval must be consistent with Section 2.125-M of the Comprehensive Plan which requires the economic and efficient utilization of land; efficient use of existing and programmed public services and facilities; and the creation of an attractive development that is compatible with the adjacent and surrounding uses, utilizes functional open space for internal recreation, and conserves natural resources.*” In short, this process provides the applicant with greater flexibility, typically in the form of more homes than would be permitted by-right, in exchange for increased oversight of the development by County staff which allows staff to analyze design and compatibility and apply conditions to mitigate any deficiencies. Approval of the proposed PD will allow for an innovative design (*Exhibit 6*).

The proposed development is compatible with the surrounding area as the RH designation permits multi-family development. The site’s southern boundaries abut a medium scale multifamily condominium complex developed at just under seven (7) dwelling units per acre. The apartment complex on the western side of the subject property has a density of 18 dwellings per acre within the RL-1 district. The proposed request allows for the transition from potentially high levels of commercial activity to lower medium density multifamily uses.

The submitted site plan indicates a proposed lift station near the southeast corner of the site but this will be evaluated further during the Level 2 review as the Urban Growth Area (UGA) requires connection to centralized potable water and wastewater when available. There are multiple points of connection to water and wastewater available at this location. Reclaimed water is also available on Sheperd Road. The site is within the Southwest Regional Utility Service Area (SWRUSA) and has more than adequate capacity to serve the proposed development. The site is located within a development area that has adequate levels of urban infrastructure and services with capacity to serve it, including direct access to public transit. There is available capacity on all major roadways adjacent to the subject property. Public safety facilities are at urban levels and schools are in close proximity to the site.

Findings of Fact

- *LDPD-2023-11 is a Planned Development request for 200 multi-family units on ±14.58 acres. The site is located within a Residential High (RH) land use district and the Urban Growth Area (UGA). The maximum by right density at this location is 10 DU/AC; the applicant is requesting a density of 13.72 DU/AC.*
- *According to Table 2.1 of the LDC, “multi-family” may be achieved in the RH district via a Conditional Level 2 (Engineered Site Plan) Review.*
- *Per Table 2.2 of the LDC, the by right density is 10 DU/AC but with an approved PD, the density may be increased to 15 DU/AC.*
- *Per Chapter 2, Table 2.2 setbacks for this development includes: 15 ft from internal/ local rights-of-way; 35 feet from Urban Collector rights-of-way; 7 feet interior side; 10 feet interior rear. Accessory setbacks are five (5) feet while the maximum structure height is 50 feet.*
- *Access via **ImperiaLakes Boulevard** will be utilized for emergency access and the Lift Station maintenance only.*
- *The subject site is within the ImperiaLakes Development of Regional Impact (DRI) first approved after the PUD approval on September 27, 1973, and was considered “Essentially Built Out” via a resolution adopted by the Board on January 5, 2016.*
- *The immediate surrounding uses include commercial and an array of residential types.*
- *This site is located in the Urban Growth Area (UGA). Policy 2.105-A5 of the Comprehensive Plan states that development within the Urban Growth Areas shall conform to the following criteria as further specified in the Land Development Code:*
 - a. *connect to centralized potable water;*
 - b. *connect to centralized sanitary sewer systems if available.*
 - c. *incorporate design features that promote healthy communities and green building practices, as established in Section 2.1251, Community Design, of this element;*
 - d. *promote the implementation of "Complete Street" and "Conservation Development" principles as established under Section 2.1251, Community Design, of this element;*
 - e. *promote the integration of pedestrian-oriented features, including sidewalks, trails, or walkways into every development including appropriate pedestrian shelters or awnings;*
 - f. *provide access to civic space, parks, green areas, and open space and other amenities;*
 - g. *be supported by public safety (i.e., fire, EMS and law enforcement);*
 - h. *have access to public schools;*
 - i. *be encouraged to provide connectivity with adjacent uses within the TSDA, and facilitate connectivity between the TSDA and other urban centers and the rural development areas;*
 - j. ***encourage the inclusion of a variety of housing choices and mixed uses; and***
 - k. *additional standards supporting transit if development is within the "Corridor and Center Overlay" (Section 2.124-A);*

- *According to Footnote #1 in LDC Table 2.2, “Residential density is the average number of dwelling units per acre of land. Gross density is calculated by dividing the total number of dwelling units on a site by the gross site area, exclusive of existing water bodies and limited transfer of density out of wetlands per Section 620.”*
- *“Planned Development” are a “C3” conditional use in the RH land use district and subject to the conditional use standards found in Section 303 of the LDC. Per Chapter 3, Section 303 of the LDC, “the review process is described in Section 906, Level 3 Reviews, and includes a site plan submittal for review by the Development Review Committee (DRC) and a public hearing before the Planning Commission (PC).”*
- *According to Section 303 of the LDC, “Planned Development (PD) is a special approval that allows for project design flexibility and attaching conditions when warranted. PD approval must be consistent with Section 2.125-M of the Comprehensive Plan which requires the economic and efficient utilization of land; efficient use of existing and programmed public services and facilities; and the creation of an attractive development that is compatible with the adjacent and surrounding uses, utilizes functional open space for internal recreation, and conserves natural resources.”*
- *The new Planned Development approach applies to all Future Land Use Map Development Areas and most land use districts. **This includes a three-fold concept for how to evaluate a development proposal and density eligibility:***
 - 1) It identifies the timing of a proposed development relative to intensity based on the proximity to necessary infrastructure and services available, (**Where is it**)*
 - 2) It evaluates the internal design of a project for how well it meets the needs of its future residents, and (**What’s in it**)*
 - 3) It evaluates the relationship between a project and the community around it in terms of transition to less intense neighboring properties, use of green infrastructure, and location and type of vehicle access. (**How it fits**)*
- *LDC Section 303 (PD), also states “an application for PDs, SPDs, RMDs, and RBMDs shall include a site plan per the requirements of Section 906.D, an Open Space Plan, Amenity Plan, and project narrative addressing how the plans meets: Timing of Development, Internal Design, and External Design.” This site was reviewed for the above consistency during the preliminary phases of the current PD Ordinance.*
- *According to LDC Section 303, PDs are required to provide a minimum of 20% Open Space. A multi-family development must provide 500 sq. ft. per unit of that space towards Recreational Open Space.*
- *“Planned Development” is defined in Chapter 10 of the LDC as “A land use or uses prepared, constructed, and maintained according to a binding plan as a single entity containing one or more structures and accessory uses. Strict adherence to land use district standards may be relaxed for the purpose of accomplishing a greater objective such as increased internal vehicle trip capture, resource protection, further compatibility with adjacent uses, and more efficient use of public infrastructure. Multiple land uses contained within Planned Development shall have a functional relationship with each other as well*

as consistency with the land use district.” Development criteria for Planned Developments is found in Section 303 of the LDC.

- *“Multi-Family” is defined in Chapter 10 of the LDC as “A building or portion thereof designed for occupancy by three or more families living independently in which they may or may not share common entrances and other spaces. Each unit is an independent housekeeping unit (room or suite of rooms used exclusively for permanent or seasonal residential occupancy as a home or residence of one (1) individual, family or household, and not including hotel rooms. **Individual units may be owned as single-family attached dwellings (duplex), townhouses, condominiums, or offered for rent (apartment).**”*
- *The Comprehensive Plan defines Compatibility in Section 4.400 as “A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.”*
- *According to Policy 2.125-M of the Comprehensive Plan, the Planned Development process allows “for increasing densities and intensities that may be permitted under certain circumstances, or using innovative design techniques, or providing a mixture of land uses. Planned Development may also be used to gain project design flexibility and to attach conditions where warranted. Planned Development shall comply with density bonus points as outlined in the Land Development Code.”*
- *The subject property has approximately 360 feet of direct frontage on Shepherd Road, an Urban Collector roadway.*
- *There are sidewalks on both sides of Shepherd connecting to the commercial uses to the west and to the east as far as State Road 37. They also connect to an elementary school and a regional park.*
- *The closest mass transit stop is under 700 feet from the site on Shepherd Road and there are sidewalks and cross walks to accessibly reach them.*
- *The site is within an unnumbered A-Zone (100-year Flood Hazard Area), there are also slight wetlands on the southeast corner of the property near its frontage on ImperiaLakes Blvd.*
- *The property is served by the Polk County Sheriff’s Office Southwest District, located at 4120 US Hwy 98 S in Lakeland. For April 2024, the average response time for Priority 1 Calls was 10:18 and Priority 2 Calls was 20:37.*
- *For the 2022-23 school year, the property is zoned for James Sykes Elementary, Mulberry Middle and Mulberry Senior High School. The applicant will need to apply with Polk County School Board for concurrency at the time of the Level 2 review.*
- *Fire and EMS will be a provided via Polk County Fire Rescue Station 2, located at 2523 Ewell Rd, Lakeland, FL 33801. The response time is seven (7) minutes.*
- *The subject site is within the County’s Southwest Utility Service Area for water, wastewater, and reclaimed water. There is available capacity to service the site for all three and multiple service lines for connections in the abutting rights-of-way.*

- *There are no known archeological or historical resources on the subject site, per data from the Florida State Historical Commission.*
- *The property is not located within a wellfield. The closest public wellfield is approximately 3,800 feet to the west at the County's ImperiaLakes Water Treatment Plant on the opposite end of ImperiaLakes Boulevard and not in the 10-year cone of influence.*
- *The subject site consists of approximately 73 % Pamona Fine Sand and 27% Ona Fine Sand; and the proposed project area ±14.58 acres, consist of approximately 60 % of Pamona Fine Sand and 40% Ona Fine Sand.*
- *According to the Florida Natural Areas Biodiversity Matrix, the subject site is not located within a one-mile radius of an endangered habitat community.*
- *Access to the subject site is from Shepherd (Road No. 933002), a paved, County maintained 52-foot wide Urban Collector Roadway.*
- *The subject site has a contour of 116 feet at the northern boundary to 121 feet at the southern property boundary.*
- *The nearest park is Loyce E. Harpe Park, a regional facility, located 1¾ miles driving distance to the east. Christina Park, a community level facility, is located at 625 West County Road 540A, two miles to the north.*
- *The subject site is not located within an airport impact district.*
- *This request has been reviewed for consistency with SECTION 2.102 GROWTH MANAGEMENT and SECTION 2.105 URBAN GROWTH AREA (UGA) of the Comprehensive Plan.*
- *This request has been reviewed for consistency with Chapter 2, Tables 2.1 & 2.2; Chapter 3, Section 303; and Chapter 9, Section 906 of the LDC.*

Development Review Committee Recommendation: Based on the information provided by the findings of fact, information provided by the applicant, a recent site visit, and the analysis conducted within this staff report, the Development Review Committee (DRC) finds that with the proposed conditions the request **IS COMPATIBLE** with the surrounding land uses and general character of the area and **IS CONSISTENT** with the Polk County Comprehensive Plan and Land Development Code. Therefore, the DRC recommends **APPROVAL of LDPD-2024-2**.

CONDITIONS OF APPROVAL

Based on the findings of fact the Development Review Committee recommends **APPROVAL of LDPD-2024-2** with the following conditions:

1. Approval of LDPD-2024-2 shall be for a multi-family development of up to 200 units on ±14.58 acres as shown on the site plan and described within the staff report.
2. The following landscape buffers apply: 50' Type "A" along Shepherd Road; 15' buffer to the west and southern perimeter; 20' buffer along the eastern boundaries, as identified on the site plan.
3. The amenities on the site plan shall include, at minimum: a clubhouse, pool, and tot lot.
4. Access via ImperiaLakes Boulevard will be utilized for emergency access and lift station maintenance only.
5. The site plan included herein together with the conditions of approval shall be considered the "Binding Site Plan." Any modifications to LDPD-2024-2, except for those listed in Section 906.E of the LDC, shall constitute a Major Modification to this approval and require a Level 3 Review before the Planning Commission.
6. Prior to site clearing or grubbing, the applicant shall hire a qualified professional to conduct a site survey/walkover to ensure that no threatened or endangered plant or animal species exist on the site. If any are discovered, the applicant shall properly protect the specie(s) or mitigate any impacts consistent with federal, state, and local law.

GENERAL NOTES

NOTE: This staff report was prepared without the benefit of testimony and evidence submitted by the public and other parties at a public hearing.

NOTE: Approval of this request shall not constitute a waiver or variance from any applicable development requirement unless specifically noted in the conditions of approval and consistent with the LDC.

NOTE: All written comments made in the application and subsequent submissions of information made during the application review process, which are on file with the Land Development Division, shall be considered to be binding upon the applicant, provided such comments are not at variance with the Comprehensive Plan, LDC or other development regulations in effect at the time of development.

NOTE: Approval of this request is only for Level 3 Review and only for those development decisions within the Planning Commissioners' jurisdiction. A Level 2 Review (engineered plans) will be required reflecting the standard conditions listed in Section 303 of the Land Development Code and the development standards listed in Chapter 7 of the Land Development Code. Upon completion of the Level 2 Process, building permits will be required for all structures in accordance with Chapter 553 of the Florida Statutes.

NOTE: Issuance of a development permit by the county does not in any way create any rights on the part of the applicant to obtain a permit from a state or federal agency and does not create any liability on the part of the county for issuance of the permit if the applicant fails to obtain requisite approvals or fulfill the obligations imposed by a state or federal agency or undertakes actions that result in a violation of state or federal law.

Surrounding Land Use Designations and Current Land Use Activity

The following table provides a reference point for notable and pertinent Future Land Use Map districts and existing land uses upon them.

Table 1

<p style="text-align: center;">Northwest</p> <p>Residential Low-1 (RL-1) PD 05-14 Glenbrook Chase (single-family detached 3.8 du/ac) Institutional (INST-1) Shepherd's Community United Methodist County's 3.4-acre drainage facility</p>	<p style="text-align: center;">North</p> <p>Community Activity Center (CAC) Paintball, sporting goods store, self- storage with RV/Boat parking</p>	<p style="text-align: center;">Northeast</p> <p>CAC First Baptist Church Imperial Lakes Childcare Center</p>
<p style="text-align: center;">West</p> <p>Residential Low-1 (RL-1) PUD 89-3 Huntington at Sundance 18 du/ac (vested)</p>	<p style="text-align: center;">Subject Property</p> <p>RH Proposed 200-unit multi-family ±14.58 acres</p>	<p style="text-align: center;">East</p> <p>CAC Shopping Plaza Publix (anchor tenant)</p>
<p style="text-align: center;">Southwest</p> <p>Residential Low-1 (RL-1) PUD 89-03 Huntington at Sundance Apartments 18 du/ac (vested)</p>	<p style="text-align: center;">South</p> <p>DRI#4 PUD 73-05 Imperial Place Condominiums 6.67 du/ac</p>	<p style="text-align: center;">Southeast</p> <p>ImperiaLakes Development of Regional Impact (DRI#4) PUD 73-05 Double Eagle (townhomes) 7.8 du/ac CAC Publix 2.8-acre drainage pond RL-1 former ImperiaLakes Golf Course</p>

Source: Polk County GIS Data-Viewer and Staff Site Visit

The applicant is requesting a 200-unit midrise multi-family development with ingress and egress from Shepherd Road. The request triggered a Level 3 review for a PD because of the proposed 13.72 du/ac within the UGA. Had the parcel been within the TSDA, the site would be eligible for up to 218-units and a Level 2 review in accordance with LDC Section 303 (Multi-Family) would suffice.

The subject property is bordered by three (3) multifamily developments, a large shopping plaza, a four-lane divided roadway and more non-residential uses. There are large drainage facilities just off the southeast and northwest corners of the property. It has over 360 feet of direct frontage on a four-lane divided roadway with a median cut on the edge of the frontage. There is just under 87 feet of frontage on ImperiaLakes Boulevard that is limited by a drainage pond and bridge structure leaving approximately 40 feet of land connection to the roadway. A small creek also bifurcates the property from the southeast corner to the northwest corner.

The proposed development is compatible with the surrounding area as the RH designation permits multi-family development. The site's southern boundaries abut a medium scale multifamily condominium complex developed at just under seven (7) dwelling units per acre. The proposed request allows for the transition from potentially high levels of commercial activity to lower medium density multifamily uses.

Compatibility with the Surrounding Land Uses and Infrastructure:

Planning staff analyzes a site plan for compatibility by reviewing several factors: the type and intensity of adjacent uses versus the proposed use; how the proposed development interacts with the surrounding area in relation with existing uses; access to roads and where traffic generated from the site will travel; the proximity to retail, employment, emergency services, mass transit, parks, and other public services; and how the applicant addresses possible incompatibilities that might arise from the proposed use by utilizing mitigating strategies found in the Comprehensive Plan or through Conditions of Approval agreed upon by the applicant and staff. The request is compatible with surrounding land uses and infrastructure. The proposed density is also compatible to surrounding lots though they are not in the immediate vicinity of the subject site.

The LDC defines compatibility as “A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.”

A. Land Uses:

The development will be located in a RH district and the County’s UGA. Although the applicant can achieve up to 15 DU/AC, the site’s development area limits the unit count to 10 dwelling unit by right. Approval from the Planning Commission is required to increase the density at this location. If approved, the site will not be built out to the maximum density as the applicant is requesting 200-units, a density equating to ±13.72 DU/AC.

Policy 2.102.A2 of the Comprehensive Plan states, “Land shall be developed so that adjacent uses are compatible with each other” and provides three options to address incompatibilities. The tools for accomplishing higher standards of compatibility, as outlined in the Comprehensive Plan, are as follows:

- Buffering
- Limiting Scale & Intensity
- Transition through the use of innovative techniques

Most of the property abuts a shopping plaza and an apartment complex. The shopping plaza lines the entire eastern side of the property. The apartment complex on the western side of the subject property has a density of 18 dwellings per acre within the RL-1 district. The development was approved in 1989 prior to the adoption of the Comprehensive Plan in 1991 and is by rule vested for density and intensity. The southern border abuts a medium scale multifamily condominium complex developed at just under seven (7) dwelling units per acre. A parking lot, garbage dumpster, and sanitary sewer lift station interface directly with the subject property. With proper building placement, perimeter landscaping and parking lot landscaping, the proposed development at the subject site can be easily rendered compatible.

Per LDC Section 720, the subject site will need to provide Type “A” landscaping along the frontage of the site. The applicant’s site plan indicates landscaping along the perimeter of the site and will be conditioned accordingly. The location of the site precludes the possibility of traffic generated by the development from traversing local roads or going through neighborhoods with public access solely to an Urban Collector Roadway. LDC Section 708 requires two spaces per unit for multifamily developments, excluding garages. Parking spaces shall be designed to permit entry and exit without moving any other vehicle. The site plan identifies a deficiency in the parking count, but there is a commercial outparcel that the applicant may utilize for additional parking.

The specifics on this will be addressed during the level 2 review as a waiver to the parking requirements will be needed.

Two streetlights will also be installed at the entrances of the subdivision for pedestrian safety as required by Section 707 of the LDC. All lighting shall be shielded from off-site view and provided in accordance with Chapters 7 & 8 of the LDC. There is currently a sidewalk along the frontage of the property. This request is compatible with surrounding land uses and infrastructure.

B. Infrastructure:

According to Comprehensive Plan POLICY 2.102-A1: DEVELOPMENT LOCATION, “Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.”

There is ±360 feet of direct frontage on Sheperd Road, which is a four-lane divided urban collector roadway, and over 80 feet (40 feet useable) of frontage on ImperiaLakes Boulevard. The majority of traffic in and out of the site will be on Shepherd Road. There is more than adequate capacity on it and surrounding roadways to accommodate the proposed development. Access to ImperiaLakes Boulevard only provides enough space for emergency access. There is mass transit available, and stops are accessible close to the site.

Drainage will be a major emphasis in the design of the development. Stormwater runoff from the entire north end of the ImperiaLakes development flows through this property to a County managed outfall that connects to Poley Creek, then on to the Alafia River, and out to the Gulf of Mexico. Commercial and residential drainage combine in the pond on the southeast which serves as a stormwater capacitor. As storm events intensify more water is released through the creek that splits the subject property in half. This water is piped under Shepherd Road to a 3.8-acre dry pond facility that manages it through events before releasing through another tributary to Poley Creek.

Multiple points of connection to water and wastewater available to the subject site. Reclaimed water is available on Sheperd Road. The Southwest Regional Utility Service Area (SWRUSA) has more than adequate capacity to serve the proposed 200-unit development. There are overlapping fire rescue stations to serve the site within three (3) miles. A new school that has been sited, acquired, and designed within three miles of the property will soon be under construction. There are community and regional parks nearby. One is within one (1) mile walking distance of the property and there is a sidewalk connection.

Nearest Elementary, Middle, and High School

For the 2023-24 school year, the property is zoned for James Sykes Elementary, Mulberry Middle and Mulberry Senior High. Table 2, to follow, demonstrates the student demand this development will create and the capacity available at each zoned school. These figures are based on an Impact Fee formula for multi-family developments that assumes 0.195 elementary, 0.047 middle, and 0.069 high school student per unit.

Table 2 Schools

Name of School	Annual Estimated Demand	Driving Distance	School Capacity
James Sykes Elementary	39	±½ miles driving distance	93%
Mulberry Middle School	10	±4½ miles driving distance	115%
Mulberry Senior High School	14	±4¾ miles driving distance	82%

Source: Polk County School Board, GIS

Mulberry Middle School is over capacity. However, the School Board has property on Yates Road and plans approval for a new middle school less than three miles from the site. The applicant will be required to apply for a binding school capacity determination at the time of the Level 2 Review submittal. Should any of the other schools exceed capacity at the time of the Level 2 Review, a review of nearby schools will be performed in order to locate placement for students.

Nearest Sheriff, Fire, and EMS Station

Fire and EMS response to this project will be from Polk County Fire Rescue Station 2, located at 2523 Ewell Road. The travel distance is just under two (2) miles with an estimated 8-minute response.

The site is served by the Polk County Sheriff’s Southwest District Substation located at 4120 US Highway 98 near Polk State College and is just over 10 miles to the site. Sheriff response times are not as dependent on the distance to the nearest Sheriff’s substation but more determined by the overall number of patrol officers within the County. As of April 2024, the average response times for a Priority 1 call within this district was 10:18 minutes. The response time for Priority 2 calls was 20:37 minutes.

Priority 1 Calls are considered true emergencies, in-progress burglary, robbery, injuries, etc. Priority 2 Calls refer to events that have already occurred, such as a burglary that occurred while the homeowner was on vacation and had just been discovered. Table 3, to follow, provides a breakdown of these services, response times, and distances from the subject site.

Table 3 Public Safety Information

	Name of Station	Distance	Response Time*
Sherriff	Southwest District Command 4120 US 98N, Lakeland	±10.2 miles	Priority 1: 10:18 Priority 2: 20:37
Fire/EMS	Fire Rescue Station 2 2523 Ewell Road near Lakeland	±1.9 miles	7 mins

Source: Polk County Sheriff’s Office & Polk County Fire Rescue. Response times for April 2024.

Water and Wastewater Demand and Capacity:

This property is within Polk County’s Southwest Utility Service Area for potable water, wastewater, and reclaimed water. All three lines are located within the right-of-way of Shepherd Road. Water and wastewater lines are also in the right-of-way of ImperialLakes Boulevard. There is ample line capacity and plant capacity to serve the proposed 200-unit multifamily development. The submitted site plan indicates a proposed lift station near the southeast corner of the site but this will be evaluated further during the Level 2 review as the UGA requires connection to utilities when available.

A. Estimated Demand and Service Provider:

Within Unincorporated Polk County, multi-family developments are estimated to consume 198 gallons per day (GPD) of potable water and generate 180 GPD of wastewater. Based on

concurrency calculations utilized throughout Polk County the estimated demand for potable water is 39,600 GPD. The estimated demand for wastewater is 36,000.

Table 4, to follow, provides generalized estimates of the anticipated water and wastewater demands.

Table 4 Estimated Water and Sewer Impact Analysis

Subject Property	RH Standard Density (10 DU/AC)	Maximum Density (15DU/AC)	Proposed Plan (13.72DU/AC)
±14.58 acres RH & UGA			
Permitted Intensity	14.58 x 10 dwelling unit (du) per acre = 145 units	14.58 x 15 du = 218 multi-family units	14.58 x 13.72 = 200 multi-family units
Potable Water Consumption	145 du x 198 = 28,710 GPD	218 x 198 = 43,164 GPD	200 x 198 = 39,600 GPD
Wastewater Generation	145 du x 180 = 26,100 GPD	218 X 180 = 39,240 GPD	200 X 180 = 36,000 GPD

Source: Concurrency Manual: multifamily units generate an estimated 198 GPD potable water demand and 180 GPD wastewater.

B. Available Capacity:

There is a 20-inch potable water line in the right-of-way on Shepherd Road and there is a 10-inch line in the right-of-way on ImperialLakes Boulevard. A 12-inch reclaimed water line is located on the north side of the Shepherd Road right-of-way. For wastewater service there is an 18-inch gravity beneath the median of Shepherd Road and several lines in the right-of-way on ImperialLakes Boulevard with a public lift station on the opposite side from the property frontage. There is also a private lift station within the Imperial Place townhome development on the south end of the property.

C. Planned Improvements:

There are no planned improvements for the local utilities. Both water and wastewater systems have enough capacity to serve development at its current rate for the next 20 years.

Roadways/ Transportation Network

The Polk County Transportation Planning Organization (TPO) monitors traffic congestion on over 425 roadway segments (850 directional links). The Roadway Network Database contains current traffic data for all arterial and collector roads and includes information on the current traffic volume and level-of-service for these major roads. The report identifies both daily and peak hour traffic volumes. Daily traffic volumes are reported in Annual Average Daily Traffic (AADT) – the typical traffic volume on a weekday over a 24-hour period. Peak hour traffic represents the highest hourly traffic volume for period between 4 – 7 p.m. It is reported as both a two-way volume and as directional volumes (east and west or north and south).

The peak hour traffic volumes are used to estimate the level-of-service for each roadway, in each direction. Level-of-service refers to the quality of traffic flow. It is the primary measure of traffic congestion. Level-of-service (LOS) is measured on a scale of ‘A’ to ‘F’ with LOS ‘A’ being the best (free-flow traffic) and LOS ‘F’ being the worst (severe traffic congestion).

The proposed project will be accessed off Shepherd Road. This road is classified as an Urban Collector, County-maintained, paved roadway. The conditions are adequate, and there is available capacity. In addition, there is direct access to mass transit and a complete sidewalk network in the area.

A. Estimated Demand:

The submitted site plan indicate a proposed 200-unit multi-family development and a commercially zoned outparcel. According to methodology utilized by the Polk County Transportation Planning Organization (TPO), multifamily midrise housing (ITE Code 221) generates 4.54 Annual Average Daily Trips (AADT) and 0.39 Peak PM Hour Trips. Table 5, to follow, provides generalized estimates of the anticipated traffic demands if the property was developed at densities allowed by-right in the RH land use district; one that could be developed to its maximum intensity through a Planned Development for a multifamily development according to Section 303 of the LDC; and the proposed plan.

Table 5 Estimated Transportation Impact Analysis

Subject Property ±14.58 acres RH & UGA	RH Standard Density (10 DU/AC)	Maximum Density (15DU/AC)	Proposed Plan (13.72DU/AC)
Permitted Intensity	14.58 x 10 dwelling unit (du) per acre = 145 units	14.58 x 15 du = 218 multi-family units	14.58 x 13.72= 200 multi-family units
Average Annual Daily Trips (AADT)	145 x 4.54 = 659 AADT	218 x 4.54 = 990 AADT	200 x 4.54 = 908 AADT
PM Peak Hour Trip	145 x 0.39 = 56 AADT	15 X 0.39 = 6 AADT	15 x 0.39 = 78 AADT

Source: Multi-family mid-rise calculation from Table 1: Minor Traffic Study used for calculation numbers. ITE Code 221, 4.54 AADT and 0.39 AADT PM Peak Hour Trips.

According to the submitted site plan, public access for the proposed 200-unit multi-family midrise development will be on Shepherd Road. Of the Peak PM trips, 39% - or 78 vehicles - are expected to exit the development during the busiest driving periods. A Minor Traffic Study will be required during the Level 2 Review process to provide a more detailed analysis of the potential transportation impacts that may result from this development because the Average Annual Daily Trip rate (AADT) is estimated to be above 50 but below 750.

B. Available Capacity:

The submitted site plan proposes a primary access from Shepherd Road and an emergency access from ImperiaLakes Blvd. Shepherd Road (Road No. 933002) is a County maintained Urban Collector roadway serving the proposed development and is tracked for traffic concurrency by the Polk County Traffic and Planning Organization (TPO). It has a paved width of 52 feet and runs east and west along the north side of the subject site. Table 6, to follow, displays the generalized capacity on the most affected transportation links.

Table 6 Roadway Link Concurrency

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard
4144E	Shepherd Road (4-lane section) From: Bailey Road To: State Road 37	C	918	D
4144W	Shepherd Road (4-lane section) From: State Road 37 To: Bailey Road	C	882	D
4145E	Shepherd Road (2-lane section) From: County Line Road To: Bailey Road	C	455	D
4145W	Shepherd Road (2-lane section) From: State Road 37 To: County Line Road	C	441	D
5805N	S. Florida Ave (SR 37) From: Shepherd Road To: Pipkin Road	C	691	D
5805S	S. Florida Ave (SR 37) From: Pipkin Road To: Shepherd Road	C	637	D
5804N	State Road 37 From: State Road 60 To: Shepherd Road	B	1,155	D
5804S	State Road 37 From: Shepherd Road To State Road 60	B	1,121	D
8089N	Lunn Road From: Shepherd Road To: Ewell Road	C	517	D
8089S	Lunn Road From: Ewell Road To: Shepherd Road	C	505	D
4027N	County Line Road From: State Road 60 To: Pipkin Road	B	962	D
4027S	County Line Road From: Pipkin Road To: State Road 60	B	928	D

Source: Polk County Transportation Planning Organization, Concurrency Roadway Network Database October 13, 2023

The proposed use will require a traffic study during the Level 2 Review. The ultimate improvements needed to support the future development will be in the design of the access and the conversion of the current median opening to include westbound left-turn movements into the site. The combined access with a proposed 2-acre commercial outparcel that will share the median cut will prompt the improvements under the current requirements of LDC Section 705.

C. Roadway Conditions:

Shepherd Road is a four-lane Urban Collector roadway that is in excellent condition. ImperiaLakes Boulevard is technically a two-lane Urban Collector in very good condition for the segment that fronts the property. However, it is not proposed to be a full access to future development of the site.

D. Sidewalk Network

There are sidewalks on both property road frontages. The area has a rather robust sidewalk network that connects this site to mass transit, commerce, schools, and recreation facilities. It is unlikely that there will be full access to ImperiaLakes Boulevard. However, emergency vehicle access, lift station and pedestrian access will be requirements of the site's future development plans.

E. Planned Improvements:

The design is underway, and land has been purchased for the drainage improvements to ImperialLakes Boulevard. Based on analysis, preliminary improvements may be constructed to preempt anticipated flooding of the roadway during storm events. Other improvements to the roadway network are occurring in the next five years. Table 7, to follow, lists the ones closest to the site of the proposed amendment.

Table 7

Road	Fiscal Year CIP (Construction)	Project Description
ImperialLakes Boulevard	Design	Drainage improvements - Land purchased under consultation with contractor for design
West Pipkin Road (Medulla Road to SR 37/S. Fla. Ave.)	Construction 2023-2024 \$51,228,770	Widen road from two-lanes to four-lanes from Medulla Road to South Dossey Road and widen remainder to three-lanes from South Dossey Road to SR 37/S. Fla. Ave. (total length is around 4.2 miles). Improvement is needed based on growing traffic volume.
Old Highway 37 at Schoolhouse Road	Design	Signalization with coordination of railroad crossing
Ewell Road	Design	Drainage improvements at Creekwater Drive

F. Mass Transit

The site is directly served by a fixed route mass transit line. There is a bus stop less than 700 feet from the site. It is served by Route 21X of the Citrus Connection named the Westside Lakeland/Bartow Express. This is a dual route line that provides service between Shepherd Road and the City of Bartow while periodically providing connection as far south as Bradley Junction. The routes connect to two main transfer points providing access to routes serving other parts of the County such as Lakeland and Winter Haven. 21X has 75-minute headways.

Higher residential density development creates higher demands for transit. As the demand for transit increases in an area, the transit provider can service the routes. This enables reduced headway times which in-turn promotes greater ridership. This is why multifamily development is a catalyst for growing a robust mass transit system.



Park Facilities and Environmental Lands:

The ImperialLakes development is located within proximity to an array of parks and environmental lands. Also, the County recently purchased property within the development for drainage mitigation that may have some recreational purposes in the future.

A. Location:

Loyce E. Harpe Park, a regional facility, is located 1¼ miles driving distance to the east. Christina

Park, a community level facility, is located at 625 West County Road 540A, two miles to the north.

B. Services:

Snively- Loyce E. Harpe Park features multi-use fields, Little League baseball fields, softball fields and more in an area where a phosphate mine once existed. Amenities include eight 200-foot youth fields; four 300-foot adult softball fields; six multi-use fields; seven miles of mountain biking course; dog park; two covered batting tunnels; seating capacity for 1,600; lights for nighttime play; concession stands; playground; and pavilion.

Christina Park includes five softball fields with lighting and irrigation, dugouts and bleachers, and shelters complete with a concession building and restrooms. There is a Grand Pavilion with restrooms which can be reserved for special events, numerous picnic areas, including those with shelters and a covered outdoor grill. There is also a pedestrian trail around the perimeter of the park and playground area.

C. Multi-use Trails:

The closest multi-use trail is within the Lakeland Highland Scrub Trail, located approximately six (6) miles east from the subject site. The trail offers off-road bicycle and hiking areas. Bicycle trails are also located at Loyce E. Harpe Park less than a mile to the south and in the new Se7en Wetlands Park connected to it.

D. Environmental Lands:

The closest publicly accessible environmental lands are within the Lakeland Highland Scrub Trail, located approximately six (6) miles east from the subject site. Lakeland Highlands Scrub is a 551-acre conservation area that is like no other in Polk County. Located in south Lakeland, it is home to one of the largest undeveloped scrub properties on the Lakeland Ridge, one of a series of elevated sandy ridges along the backbone of an area known as "peninsular Florida." This area used to be surrounded by water, but now, the Lakeland Highlands Scrub rises more than 230 feet above sea level. The Polk County Environmental Lands Program and the Florida Communities Trust Preservation 2000 Program jointly provided funding to acquire the Lakeland Highlands Scrub.

The Se7en Wetlands is located at the southern end of Loyce E. Harpe Park. The City of Lakeland owns and operates Se7en Wetlands, a constructed wetland treatment system, which provides tertiary treatment, or final polishing, for all of the City's wastewater. It is comprised of over 1,600 acres of marshes, swamps, uplands, and lakes and connects to the North Prong of the Alafia River, which flows directly to Tampa Bay. Se7en Wetlands also provides water for Tampa Electric Company's Polk Power Station. Se7en Wetlands is home to a diverse community of plant and animal species.

Environmental Conditions

The property is composed of Pamona Fine Sand and Ona-Ona Fine Sand. There are specific environmental limitations on the site that will need to be adequately addressed during the engineering phase. For instance, a significant amount of water currently moves through the site, so drainage management is priority but can be managed with proper engineering practices. Furthermore, the code requires future development to match the preexisting drainage conditions of the property after full buildout for a 25-year storm event over a 24-hour period in both volume and rate.

The subject site is not located within any of the County's identified Wellhead-Protection Areas. According to the Florida Natural Areas Inventory Biodiversity Matrix, the subject property is not located within a one-mile radius of an endangered species. The subject property is not located within a Historical Preservation area. The subject site is not located within an Airport Height Notification or In-Flight Visual Interference Zones.

A. Surface Water:

A small creek runs through the property from the southeast corner to the northwest corner. There is a wet stormwater retention pond on the southeast corner of the property that is shared with the Publix shopping plaza. Stormwater runoff from the ImperiaLakes golf course flows through culverts that transect ImperiaLakes Boulevard into the shared pond. As the water level on the pond rises, more will flow into the creek to the northwest where water flows through culverts under Shepherd Road and into a drainage system that connects to Poley Creek which is a tributary of the Alafia River.

The County controls the flow of stormwater at ImperiaLakes Boulevard and Shepherd Road. There are proper mechanisms in the LDC to adequately manage drainage crossing the property. Future development of this site will require input from County Roads & Drainage division staff in addition to Land Development Engineering staff.

B. Wetlands/Floodplains:

There are few wetlands onsite. They are identified by a creek and a small portion of the wet retention pond shared with the Publix shopping plaza in the southeast corner of the property near its frontage on ImperiaLakes Boulevard. Approximately 40% of the site is within an unnumbered A-Zone (100-year Flood Hazard Area). A flood study is a must for the development of the site based on both regulations and the lack of limited physical knowledge available to determine how to manage a flood event on the site.

Managing stormwater has been an issue of concern in the ImperiaLakes development. Some storm events have rendered ImperiaLakes Boulevard impassible for periods of time. As such, drainage on and off the property cannot be taken lightly in the development of the site. The County manages the flow of water through the creek both upstream and downstream. It will be in the developer's best interest to design the site consistently with the public's stormwater expectations. The proposed site plan appears to maintain the natural drainage but will be further evaluated during the site plan review process.

C. Soils:

The subject site consists of approximately 73 % Pamona Fine Sand and 27% Ona Fine Sand; and the proposed project area ±14.58 acres, consist of approximately 60 % of Pamona Fine Sand and 40% Ona Fine Sand. The soil types and limitations, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey, are listed in Table 8, below.

Table 8

Soil Name	Septic Tank Absorption Field Limitations	Shallow Excavations	Limitations to Dwellings w/o Basements	% of Site (approximate)
Pamona Fine Sand	Severe: wetness, percs slowly	Severe: wetness	Severe: wetness	73 %
Ona-Ona, Wet, Fine Sand 0 to 2 % slopes	Severe: wetness, poor filter	Severe: wetness	Severe: wetness	27%

Source: Soil Survey of Polk County, Florida, USDA, Soil Conservation Service

The soil types at this site create development constraints that will need to be address during the Level 2 Review if the request is approved. Much of the site is Pomona Fine Sand that has a typical water table depth slightly below 18 inches of the surface. The remainder of the site is Ona-Ona Fine Sand which has a potential seasonal highwater table within 12 inches of the surface.

Development of this property will not only have to manage the stormwater that flows through the creek that bifurcates it, additional stormwater containment and treatment capacity will be needed to handle a 25-year, 24-hour storm event’s pre-post volume match. These necessary drainage structures will consume more space than in a typical development location. To maximize the requested density, the apartment structures will likely need to be built to the maximum height. As the buildings go higher, their foundations will need more support from the soil. The applicant is proposing a four-story multifamily midrise development.

D. Protected Species:

According to the Florida Natural Areas Inventory’s Biodiversity Matrix, this site is not located within a mile of a recent sighting of an endangered species. Prior to site clearing or grubbing, the applicant shall hire a qualified professional to conduct a site survey/walkover to ensure that no threatened or endangered plant or animal species exist on the site. If any are discovered, the applicant shall properly protect the specie(s) or mitigate any impacts consistent with federal, state and local law.

E. Archeological Resources:

There are no known historical or archeological resources onsite, according to the Secretary of State’s Department of Historical Resources Florida Site File.

F. Wells (Public/Private):

The property is not located within a wellfield. The closest public wellfield is approximately 3,800 feet to the west at the County’s ImperialLakes Water Treatment Plant on the opposite end of ImperialLakes Boulevard and not in the 10-year cone of influence.

G. Airports:

This property is not within an Airport Impact Zone. The closest is the South Lakeland Airport three (3) miles to the southwest and Lakeland Airport at 3.66 miles to the north.

Economic Factors:

Within a mile radius of the site are five (5) rental apartment complexes comprising of 1,731 units that were built between 1988 and the present. Carlton Arms Apartments on Shepherd Road one (1) mile to the west of the site has 902 units and was built in 1992. Huntington Hills Apartments to the west is a

292-unit apartment complex constructed in 1998. Le Mans Apartments ½ mile to the east is 177 units and was built in 1988. The Avenues Apartments on SR 37 just north of Imperial Christina Plaza is 264 units and was constructed in 2017. There is a 96-unit apartment complex under construction between Wal-Mart on SR 37 and Loyce Harp Park. As the south Lakeland area population grows, the frequency of apartment complexes added to the market increases. This shows a strong and growing rental housing market.

This project will add to the mosaic of different housing styles within the surrounding area. The site is surrounded by site build homes and multi-family developments- including townhomes, apartments, and condominiums. This diversity in the housing stock is healthy for a community. In addition, urban level services - including potable water, wastewater, mass transit, nearby schools, parks etc. – make this area an attractive place to live. The location of a variety of housing developments near employment centers is simply good planning. This reduces the cost of living for the individual as well as the commuting distances and travel times for employees.

Consistency with the Comprehensive Plan and Land Development Code:

Table 9, to follow, provides an analysis of the proposed request when compared to typical policies of the Comprehensive Plan selected by staff for evaluation of development proposals. Based upon this analysis, the proposed request is consistent with relevant policies of the Polk County Comprehensive Plan.

Table 9 Comprehensive Plan

Comprehensive Plan Policy	Consistency Analysis
POLICY 2.102-A1: DEVELOPMENT LOCATION - Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing Communities.	Urban services are provided in close proximity to the site. It is located in between multifamily developments of high densities and commercial development.
POLICY 2.102-A3: DISTRIBUTION - Development shall be distributed throughout the County consistently with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized; and compact, high-density and intensity development is located where urban services can be made available.	This is in an area that has been planned for urban development. The County has made significant investments to assure there are ample quantities of the necessary infrastructure available to the site for more intensive land uses than the current designation allows.
POLICY 2.102-A2: COMPATIBILITY - Land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.	The site is located in between multifamily developments of high densities and commercial development. It fronts a four-lane urban collector roadway.
POLICY 2.102-A4: TIMING - The development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services which, at a minimum, shall require compliance with the Plan's Level of Service requirements and the County's concurrency management system.	This request is one of the few remaining undeveloped properties in a rather urbanized area. The timing is right for more intensive uses of this property. The site is located within an area that has a significant amount of capacity with potable water, traffic, and public schools. Emergency services are within a reasonable time and distance.
POLICY 2.102-A15: ADEQUATE PUBLIC FACILITIES - The County will direct new growth to areas where adequate public facilities exist or are planned; and ensure that essential services are in place to provide for efficient, cost-effective response times from the Fire Department, Sheriff's Department, and Emergency Management Service (EMS).	Public safety services are nearby within 2 miles.

Development criteria for Planned Developments (PD) and Multi-Family are detailed under Section 303 of the LDC. A Planned Development was triggered because the applicant wishes to achieve 13.72 DU/AC when the maximum by right density for this site is 10 DU/AC. Had the site been within the TSDA, the RH district would have prompted a Level 2 Review in accordance with the Multifamily requirements outlined in LDC Section 303 and other developmental requirements within LDC Chapter 7.

This is the first Planned Development to come before the Planning Commission since the approval of LDCT-2027-7. Approval of the text amendment offers the Planned Development applicants an opportunity for additional development approvals, greater development intensity, and flexible development standards in exchange for a more sustainable and responsive residential product. The new Planned Development approach applies to all Future Land Use Map Development Areas and most land use districts, including RH.

This request is consistent with the Land Development Code and will be further reviewed during the level 2 review. The PD locational score is included as an attachment with the staff report. Table 10, to follow, outlines relevant components of Section 303 and how the project addresses them.

Table 10

The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 303 of the LDC:	
<i>The timing of a proposed development relative to intensity based on the proximity to necessary infrastructure and services available. (Where is it)</i>	Locational score is 40; the site only required 32 to achieve the 15 DU/AC maximum.
<i>The internal design of a project for how well it meets the needs of its future residents, and (What's in it)</i>	The site plan meets the amenity and open space requirement.
<i>The relationship between a project and the community around it in terms of transition to less intense neighboring properties, use of green infrastructure, and location and type of vehicle access. (How it fits)</i>	The proposed use provides a natural transition from higher density development to lower density multifamily.

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 11 in accordance with Section 906.D.7 of the Land Development Code.

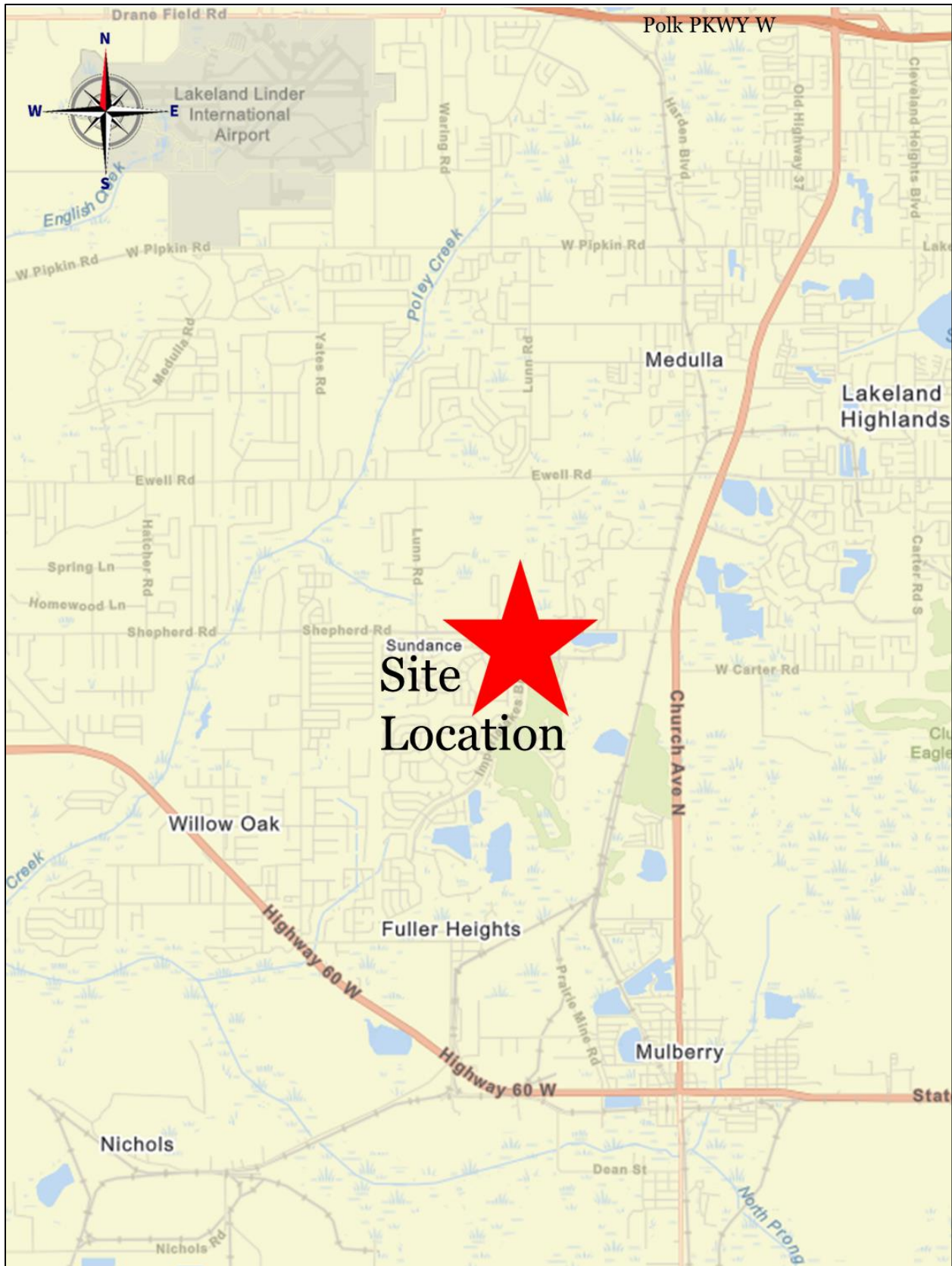
Table 11

The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:	
<i>Whether the proposed development is consistent with all relevant requirements of this Code;</i>	Yes, this request is consistent with the LDC, specifically Table 2.1 as detailed throughout the Staff Report.
<i>Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;</i>	Yes, this request is consistent with the Comprehensive Plan, specifically SECTION 2.102 GROWTH MANAGEMENT as described in Table 9. While the proposed project is within the UGA, it has urban services and development ability as identified in the TSDA areas.
<i>Whether the proposed use is compatible with surrounding uses and the general character of the area, including such factors as density, height, bulk, scale, intensity, traffic, noise, and appearance; and</i>	Yes, the request is compatible with surrounding uses and the general character of the area.
<i>How the concurrency requirements will be met if the development were built.</i>	The request is capable of meeting concurrency requirements but will be reviewed further during the Level 2 review.

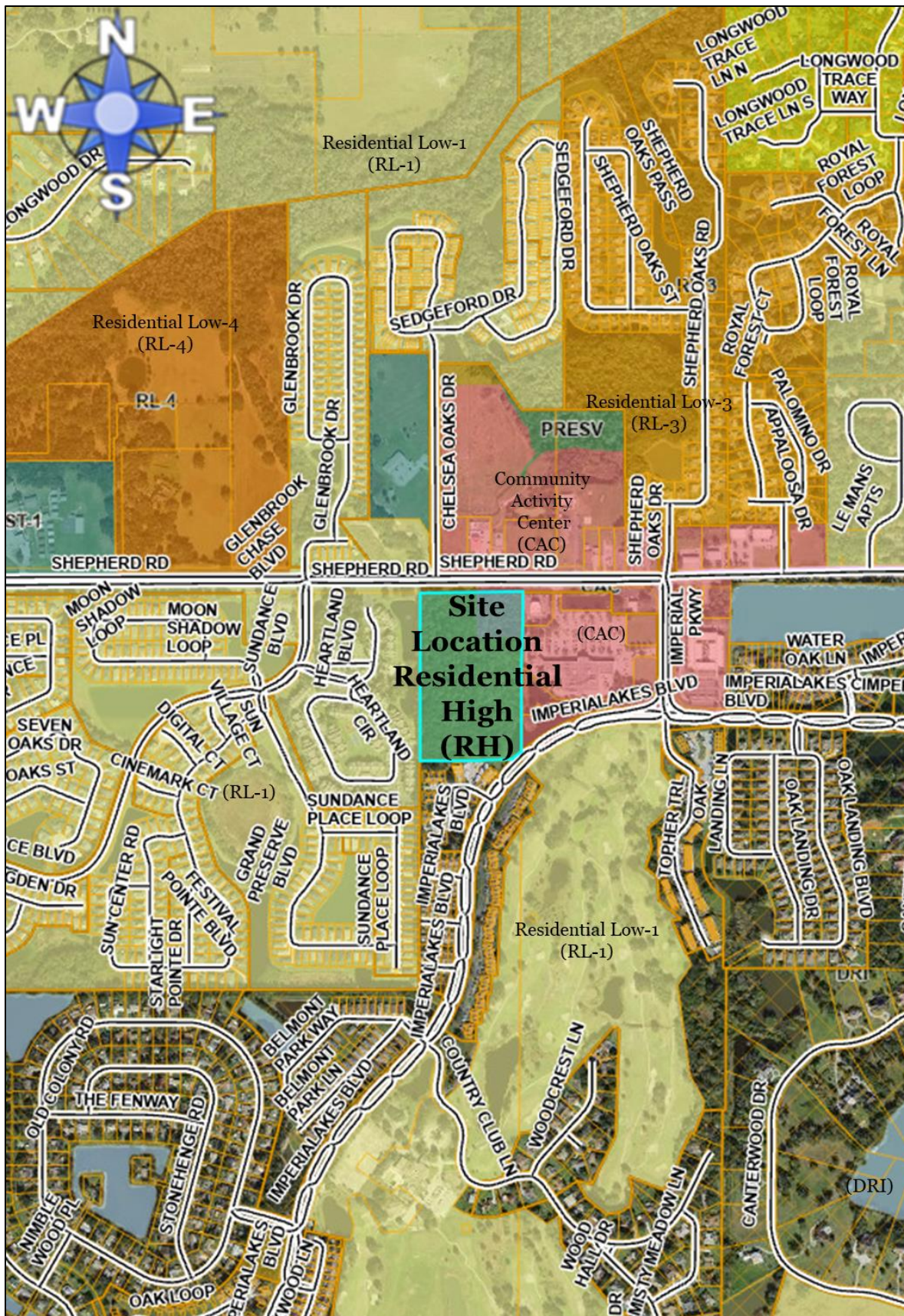
Comments from other Agencies: None

Exhibits:

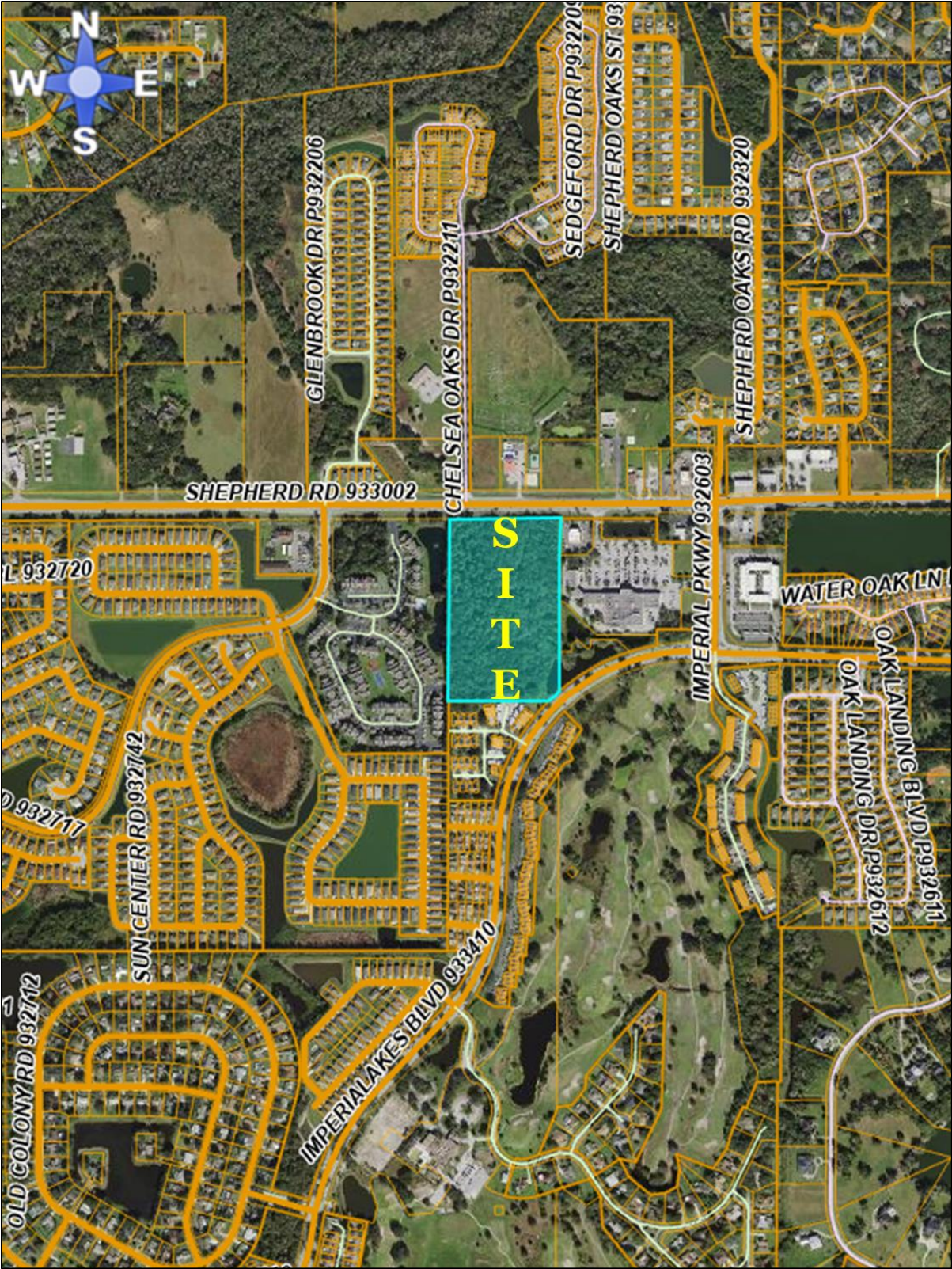
- Exhibit 1 Location Map
- Exhibit 2 Future Land Use Map
- Exhibit 3 2023 Aerial Photo (Context)
- Exhibit 4 2023 Aerial Photo (Close Up)
- Exhibit 5 Site Plan Overlaid on Site
- Exhibit 6 Site Plan



Location Map



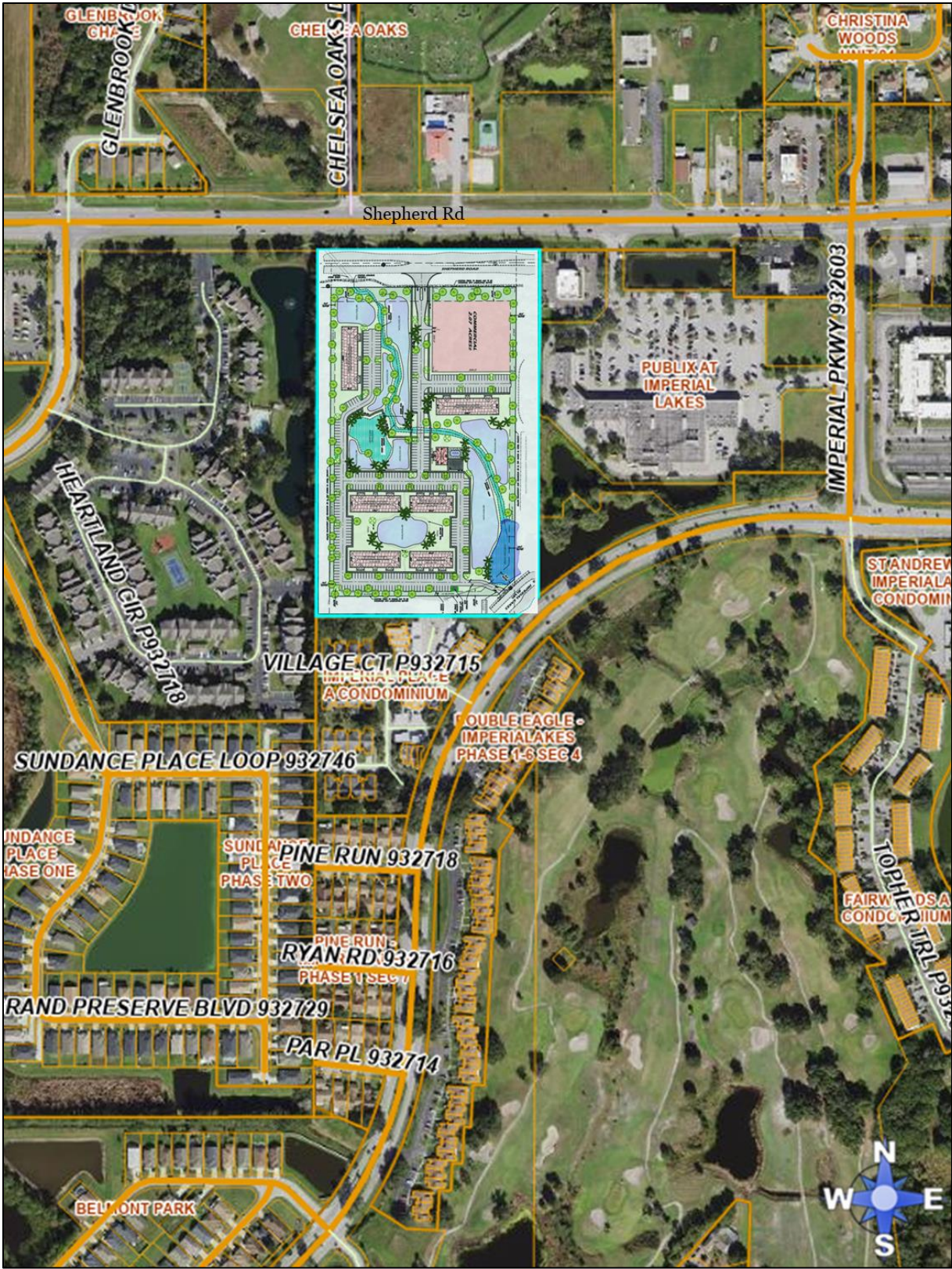
Future Land Use Map



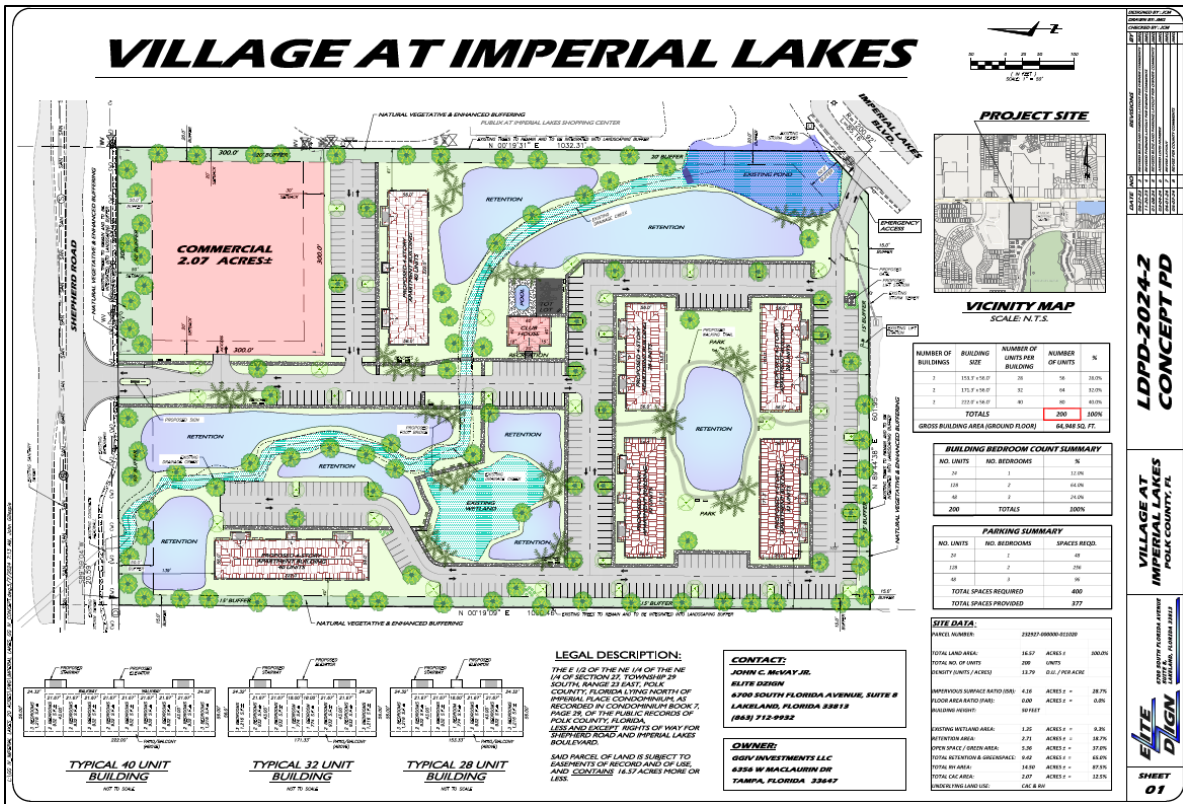
2023 Aerial Photo (Context)



2023 Aerial Photo (Close up)



Site Plan Overlaid on Site



Site Plan