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## **NORTH PRONG INDUSTRIAL**

### **IMPACT ASSESSMENT STATEMENT FORM**

An Impact Assessment Statement is required for all Level 3 and Level 4 Reviews, with the exception of text amendment requests. The purpose of an Impact Assessment Statement is to provide information on the effects a proposed development or land use action will have on the existing neighborhood and general area; on the transportation facilities; on the environment and natural resources of the County; on the public facilities for water, sewer, solid waste disposal, fire, police, public education, parks, recreation, and other utilities; and any other aspect with an identified impact of the development and deemed appropriate for concern.

#### **Land and Neighborhood Characteristics**

Assess the compatibility of the requested land use with adjacent properties and evaluate the suitability of the site for development. At a minimum, address the following specific questions in your response:

1. How and why is the location suitable for the proposed uses?

**This request, North Prong Industrial, is to change the Future Land Use from Phosphate Mining (PM) to Industrial (Ind).**

**The site is in close proximity to US Highway 60, (about 1 ½ miles) allowing access to the existing state roadway network via Nichols Road (CR 676), a 24 foot Rural Major Collector.**

**Until recently, the property was the Nichols Mine, which for over 100-years has been a mining operation for and owned by Mobil Chemical and Agrifos Mining. The area already has had significant phosphate mining, processing, and dirt mining, as well as industrial development nearly surrounding it.**

**The exception is the area to the north which is in the City of Mulberry and is vacant. That land has a wetland system on approximately the eastern half of the adjacent parcel, so is unlikely to be developed. The A/RR area to the south was a significant processing plant, and is now largely vacant.**

**Changing the land use from PM to Ind is a logical and practical progression of land use. Other land use districts would not fit in with the character of the vicinity. The area has very few homes near and many of them have worked directly or indirectly for the mining industry.**

**The site has a rail line running through it, so industrial uses that require rail access can be served, with minimal change to the rail lines.**

2. What are, if any, the incompatibility and special efforts needed to minimize the differences in the proposed use with adjacent uses?

**The only possible incompatibility is the adjoining property to the north. As mentioned above, the eastern half of that site is a large wetland system, unlikely to be developed. The balance of that border, about 1,800 feet, would be buffered with a Type C Buffer, the county's most robust, as required during the Level 2 site plan approval process.**

3. How will the request influence future development of the area?

**It is not anticipated that there will be any influence on future development of the area because most of the surrounding area is or has already been developed or used very intensely.**

### **Access to Roads and Highways**

Assess the impact of the proposed development on the existing, planned and programmed road system. At a minimum, address the following specific questions in your response:

1. What is the number of vehicle trips to be generated daily and at the PM peak hour based on the latest Institute of Traffic Engineers (ITE)? Please provide a detailed methodology and calculations.

**The overall site trip generation below is based upon the proposed maximum allowable buildout at a FAR of 0.50. We believe that high of density is unachievable because of a number of factors: The irregular parcel shapes make rectangular building layout inefficient. The addition of rail access spur lines will tend to chop up the layout. Environmental considerations will also make achieving the 0.50 FAR almost impossible. So we believe that actual construction will result in much lower trip numbers. Notwithstanding these considerations, for purposes of answering the question directly, we offer the following:**

**Industrial --The ITE Trip Generation Manual, lists 1.5 ADT/0.68 PHT per 1,000 SF of manufacturing. Using the maximum FAR of 0.50 for the 420 acres gives an ADT of 13,783 and PHT of 6,248.**

**We would point out that the current FLU of PM would allow about 50% more trips than the proposed Industrial district. Also, any site development will require meeting concurrency reference the adjoining roadway network. So the roads system may be the limiting factor for site development intensity. We intend to prepare more realistic traffic projections and roadway network limitations in the re-submittal process.**

2. What modifications to the present transportation system will be required as a result of the proposed development?

**County approved driveways will be constructed onto the property from the adjoining county roads. Other improvements may become necessary as the site develops, based on concurrency analysis at Level 2.**

3. What is the total number of parking spaces required pursuant to Section 708 of the Land Development Code?

**Additional parking may be provided as required or needed by the owner during Level 2 permitting.**

4. What are the proposed methods of access to existing public roads (e.g., direct frontage, intersecting streets, and frontage roads)?

**There will be at least one entrance on the east side of the site to Old Nichols Road or Nichols Road, and possibly an entrance on the south to Nichols Road.**

### **Sewage**

Determine the impact caused by sewage generated from the proposed development. At a minimum, address the following specific questions in your response:

1. What is the amount of sewage in gallons per day (GPD) expected to be generated by the

proposed development?

**The sewerage generation will vary depending on the uses developed on the property.**

2. If on-site treatment is proposed, what are the proposed method, level of treatment, and the method of effluent disposal for the proposed sewage?

**All proposed on-site treatment will be in accordance to the State of Florida Department of Health, Chapter 64E, Standards for Onsite Sewage Treatment and Disposal Systems.**

3. If offsite treatment, who is the service provider? **N/A**

4. Where is the nearest sewer line (in feet) to the proposed development (Sanitary sewer shall be considered available if a gravity line, force main, manhole, or lift station is located within an easement or right-of-way under certain conditions listed in Section 702E.3 of the Land Development Code).

**The project resides in a rural area removed from existing centralized utilities.**

5. What is the provider's general capacity at the time of application? **N/A**

6. What is the anticipated date of connection? **N/A**

7. What improvements to the providers system are necessary to support the proposed request (e.g., lift stations, line extensions/expansions, interconnects, etc.)?

**Owner is not requesting connection to county sewer services.**

### **Water Supply**

Determine the amount of water to be used, how it will be distributed, and the impact on the surrounding area. At a minimum, address the following specific questions in your response:

1. What is the proposed source of water supply and/or who is the service provider?

**The project will be served by private well.**

2. What is the estimated volume of consumption in gallons per day (GPD)?

**The water demand will vary depending on the uses developed on the property, and required fire flows.**

3. Where is the nearest potable water connection and re-claimed water connection, including the distance and size of the line?

**The project resides in a rural area removed from existing centralized utilities.**

4. Who is the service provider? **Polk County**

5. What is the anticipated date of connection? **N/A**

6. What is the provider's general capacity at the time of application? **N/A**

7. Is there an existing well on the property(ies)? **Yes**

If yes, What type?

**A non-production well that was used by previous mining operation for their processes. We plan to use this well for our fire protection system onsite. The well is an 18"-800 foot deep well.**

Permit Capacity: **N/A**

Water Use Permit #: **N/A**

Constructed prior to Water Management District Permitting: Yes \_\_\_\_\_ No \_\_\_\_\_

Type of Use: \_\_\_\_\_Public \_\_\_Industrial or Commercial\_Recreation or Aesthetic \_\_\_Mining

Permitted Daily Capacity:

Average Peak Monthly Withdrawal Rate:

### **Surface Water Management and Drainage**

Determine the impact of drainage on the groundwater and surface water quality and quantity caused by the proposed development. At a minimum, address the following specific questions in your response:

1. Discuss the surface water features, including drainage patterns, basin characteristics, and flood hazards, (describe the drainage of the site and any flooding issues);

**The project will provide onsite drainage facilities which will retain the required volume and rate of flow per county and SWFWMD regulations.**

2. What alterations to the site's natural drainage features, including wetlands, would be necessary to develop the project?

**None currently proposed.**

### **Environmental Analysis**

Provide an analysis of the character of the subject property and surrounding properties, and further assess the site's suitability for the proposed land use classification based on soils, topography, and the presence of wetlands, floodplain, aquifer recharge areas, scrub or other threatened habitat, and historic resources, including, but not limited to:

1. Discuss the environmental sensitivity of the property and adjacent property in basic terms by identifying any significant features of the site and the surrounding properties.

**The site was previously mined and has limited environmental features.**

2. What are the wetland and floodplain conditions? Discuss the changes to these features which would result from development of the site.

**There are limited wetland and floodplain features on site.**

3. Discuss location of potable water supplies, private wells, public well fields (discuss the location, address potential impacts), and;

**Potable water is provided to the residential uses in this area by Polk County. There are no anticipated impacts to wells from this project.**

4. Discuss the location of Airport Buffer Zones (if any) (discuss the location and address, potential impacts).

**None in this area.**

5. Provide an analysis of soil types and percentage of coverage on site and what effect it will have on development.

**The site was previously mined, so soil analysis is impossible without detailed onsite geotechnical research, to be acquired at Level 2. The most noticeable effect is that the stormwater ponds will likely all be wet ponds.**

#### **Infrastructure Impact Information**

What is the nearest location (travel distance), provider, capacity or general response time, and estimated demand of the provision for the following services:

1. Parks and Recreation;

**This is an industrial project and does not generate a demand for parks and recreation.**

2. Educational Facilities (e.g., preschool, elementary, middle school, high school);

**This is an industrial project and does not generate a demand for public education facilities.**

3. Health Care (e.g., emergency, hospital); **The closest hospital is several miles to the north.**

4. Fire Protection; **Polk County Fire provides fire protection.**

5. Police Protection and Security; **Polk County Sheriff provided**

6. Emergency Medical Services (EMS); **Polk County EMS provided**

7. Solid Waste (collection and waste generation);

**Contract with Republic Services. Pick-up on regular schedule for dumpster.**

8. How may this request contribute to neighborhood needs?

**This facility provides manufacturing jobs to the local community. In addition, the finished products are often needed by local business and agricultural operations.**

#### **Maps**

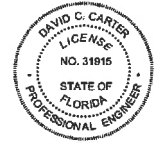
Maps shall be used to give the public agencies a clear graphic illustration and visual

understanding of the proposed development and the potential positive and negative impacts resulting from the development. Maps shall be of sufficient type, size, and scale to facilitate complete understanding of the elements of the proposed development. Scale shall be clearly indicated on each map and the dates of preparation and revisions shall be included. The project boundaries shall be overlaid on all maps. The following maps shall 8 1/2" x 11" and accompany Impact Assessment Statements:

Map A: A location map (center the site on the map) showing the relationship of the development to cities, highways, and natural features; **See attached Vicinity Map**

Map B: Map depicting the site boundary (properties included in the request) **See attached site boundary map.**

Map C: A site plan consistent with **Site Plan Standards 2** (multiple sheets may be used). In addition to the required number of copies please **include an 8 1/2" x 11" copy. N/A to map amendment**



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## **NORTH PRONG INDUSTRIAL**

### **DEMONSTRATION OF NEED**

#### **Meeting Marked Demands & Outweighing Adverse Impacts**

A number of sites in the vicinity have changed from PM to Industrial starting around 10 years ago. Because of either site conditions limiting short term development, or those sites already being developed/in process of sales, only few of those Industrial sites remain available. This indicates a strong demand for these types of development sites. In addition, the owner reports a number of requests for new industrial sites in this area. The close proximity to Hillsborough County is an additional benefit to the site.

This proposed change outweighs adverse impacts to public facilities and environmental resources primarily by avoiding those impacts in the first place. The sites will utilize existing improved infrastructure for access. Fire protection, water and sanitary sewer treatment (septic) will be provided onsite. There are limited proposed wetland impacts currently. By avoiding such impacts, the amendment will meet the market demands for the business expansion without adverse effects on the County. The Mims/McKay Family developed Prairie Industrial Park in the City of Mulberry which is approximately 350-acres and all properties have been sold.

#### **Excess Vacant Land Analysis**

There is a limited number of industrial site in the immediate area available for sale or short term development, particularly with rail access. We reviewed all nearby Industrial sites with this developer and he indicates a strong market demand exists for this type use with very little offerings for potential users.

We feel the above demonstrates that the County has a healthy development history of this designation. Furthermore, the change from PM to IND is a logical, practical progression for old mine lands. This change will have minimal effect on the County overall. The discernable impacts will only be to the immediate vicinity of the site.

#### **Why Now and Why at This Location**

The change is needed at this time because market demands indicate that additional space is not sufficient to serve the expanding manufacturing and warehousing customer base.

This location has excellent access to the state highway system and is in a remote area for the most part. There are few environmental concerns.

For Text Amendments, please provide a narrative discussing why the text amendment is needed and what other alternatives besides the request have been or could be sought as a remedy?

**N/A, this is a map amendment request.**

**An Analysis of Economic Issues** [*Minimum population support and market area radius (where applicable)*] is required when requesting a Land Use amendment from Residential to a Non-Residential Land Use designation.

**This is a change from PM to Industrial.**

**This is a manufacturing designation that does not typically feature common retail commercial establishments visited by the general public. As such, the Comprehensive Plan features a relatively large Service-Area Radius of “20 miles or more” with a Minimum Population Support of “150,000 or more people”.**

***Urban Sprawl Analysis*** (Only for CPA Map Amendments)

Address the following statements with regard to the proposed land use amendment:

1. Could the proposed amendment promote substantial amounts of low-density, low intensity, or single use development in excess of demonstrated need?

**No, the proposed amendment would allow for a relatively high intensity development near the intersection of a collector and major arterial roadway, US Highway 60. A large part of the property has been previously mined. The existing site still has large industrial buildings which may be used for additional future industrial uses.**

2. Will passage of the proposed amendment allow a significant amount of urban development to occur in rural areas?

**No, because the area already has had significant phosphate mining and processing, and dirt mining, as well as industrial development.**

3. Does the proposed amendment create or encourage urban development in radial, strip, isolated, or ribbon patterns emanating from existing urban development?

**The amendment will focus additional intensity into an area nearly surrounded by significant phosphate mining and processing, and dirt mining.**

4. Does the proposed amendment fail to adequately protect adjacent agriculture areas?

**There will be no adverse impacts to adjacent agriculture areas**

5. Could the proposed amendment fail to maximize existing public facilities and services?



**No public facilities affected.**

6. Could the proposed amendment fail to minimize the need for future public facilities and services?

**The change as proposed will minimize the need for future public facilities by providing onsite private water and sewer.**

7. Will the proposed amendment allow development patterns that will disproportionately increase the cost of providing public facilities and services?

**There is no anticipated changes to existing facilities, and therefore no additional cost of providing those services from this amendment.**

8. Does the proposed amendment fail to provide clear separation between urban and rural uses?

**The amendment will focus additional intensity into an area nearly surrounded by significant phosphate mining and processing, and dirt mining.**

9. Will the proposed amendment discourage infill development or redevelopment of existing neighborhoods?

**N/A**

10. Does the proposed amendment fail to encourage an attractive and functional mixture of land uses?

**As the surrounding area is largely developed or has been used for very intensive mining and industrial, a mixture of land uses is not ideal for this area.**

11. Could the proposed amendment result in poor accessibility among linked or related land uses?

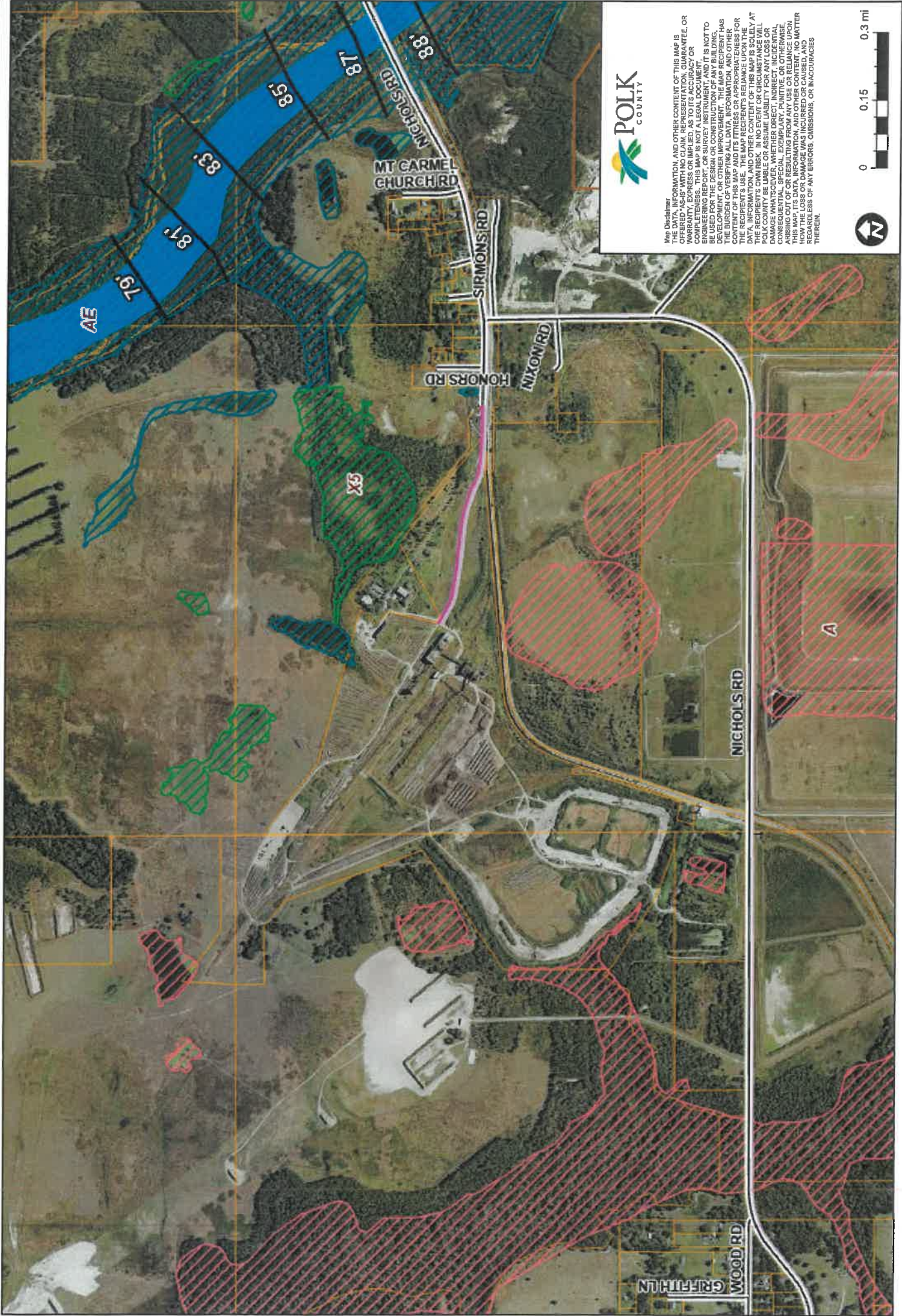
**The site would have direct access to both Nichols Road (a Rural Major Collector) and then access to Anderson Road (a Rural Minor Collector), and SR #60. Accessibility would not be an issue.**

12. As a result of approval of this amendment, how much open space will be lost?

**Minimal open space will be lost, because almost all of the site was part of the Nichols Mine at one point. Large manufacturing facilities for phosphate processing and drier plants operations have existed on this site for over 100-years. The plants were operated by both Mobil Chemical and Agrifos Mining Company.**



# Flood Map





# Soils Map



August 6, 2024

Lyndsay Yannone  
Development Coordinator  
Polk County Land Development Division  
330 W. Church St.  
Bartow, Florida 33831

**RE: Response to Request for Additional Information – LDCPAL-2024-12 – North Prong Industrial**

Dear Ms. Yannone:

This letter is in response to Polk County's request for additional information regarding the above-referenced project:

**Planning Comments:**

**Comment 1:** Demonstration of Need – The subject property is located next to Nichols, which is an existing neighborhood. As such, the applicant needs to explain whether the proposed amendment will discourage redevelopment of the exiting neighborhoods. (Criteria #9)

**Response 1:** **The existing neighborhood is on the tip of the subject property and is across Old Nichols road and on the other side of a railroad track. Additionally, the FLU request area has been setback from the nearest residential parcel a distance of 175 feet.**

**The BB mine is across the street from the residential properties. The subject site had intensive mining and processing occurring for decades, so the change to Industrial is in keeping with the traditional uses that have been near the surrounding the residential parcels.**

**So the request will not materially affect the uses currently in existence near the subject site.**

**Comment 2:** IAS – Land and Neighborhood Characteristics #2 - The subject property north of the site, within the City of Mulberry, is designated on the City's Future Land Use Map as Residential Planned Unit Development, with a maximum dwelling unit count of 4.3 units per acre. Given the significant amount of acreage proposed for industrial and the potential impacts caused by certain types of industrial uses, staff is concerned that a maximum 20-foot-wide buffer may not be sufficient. Additionally, portions of the site are near the unincorporated community of Nichols. Although the FLU exhibit shows a dimension of 175 feet from the project boundary to Old Nichols Road, surface

roads and railroads are within the 175 feet distance. Staff is concerned about the potential impact of industrial activities next to this community, and requests that the applicant provide further data and analysis to address compatibility.

**Response 2:** See response #1 above regarding the Nichols community. Additionally, referencing the road traffic, the Industrial designation's trip generation is expected to be significantly less than that for Phosphate mining. The AADT per square feet for phosphate mining and industrial are the same, 4.87/1,000 SF, but the FAR for phosphate mining is 0.75 versus Industrial which is 0.50, yielding a 1/3 reduction in potential trips.

Reference the adjoining lands inside the Mulberry limits, the eastern half of that property boundary is wetlands and floodplain. Mulberry's LDC, Part III, Section 5.03.06 (A), states "*No activities other than those listed below shall be undertaken in a wetland zone.*" Residential uses are not contained in the list of allowable uses that follows. So it's highly unlikely that homes would be built in that eastern area.

As to the western section of adjoining city limits that are upland, residential development is certainly allowed. But we would point out that Mulberry is not a very fast-growing community, and those lands are part of a large development area that stretches about a mile north before touching any existing development. So with normal development patterns, growth would begin at the existing development and works its way south (about a mile) before getting near to the subject site. That growth would take decades before occurring.

Much like the situation with the Nichols area, the subject site had intensive mining and processing occurring for decades, so the change to Industrial is in keeping with the traditional uses that have been onsite. So the request will not materially change the affect on the future adjoining residential uses.

We understand that a representative of the city planning has indicated "No objection" to the land use change.

**Comment 3:** IAS - Environmental Analysis #4 - The subject property is in the Airport Impact District for the South Lakeland Airpark. Please provide an analysis of how this request may impact the airport activities.

**Response 3:** FAA Regulations require filing a notice for construction of any building exceeding 200 feet above AGL, or for construction of a building piercing an envelope exceeding a height measured at a 100:1 ratio from the end of the runway. Given our distance to the runway of 11,500 feet, that would mean that any building constructed at a height of 115 feet AGL (11 stories) would require notice.

Comment 4: IAS - G. General Information - Please provide the information on the nearest location (travel distance), provider, capacity or general response time, and estimated demand for the following services: Health Care, Fire Protection, Police Protection and EMS (Section 910.G.).

Response 4: **Any new facilities built onsite would meet current fire codes and be constructed in a manner to limit theft and accidents. So demand for these services would be minimal and only be needed on rare occasions.**

**Healthcare – Bartow Regional Medical Center (13 Miles) 16 Minute Response Time**

**Fire Protection – Polk County Fire Rescue Station 721 (3 Miles) 4 Minute Response Time**

**Police Protection – Mulberry Police Department (3 Miles) 4 Minute Response Time**

**EMS - Polk County Fire Rescue Station 721 (3 Miles) 4 Minute Response Time**

Comment 5: IAS - Maps - Please provide the following maps per Section 910.H.: Map C: FLU Map showing the existing land use designations and districts on and abutting the proposed development, including lot sizes and density. Map E: Traffic Circulation Map.

Response 5: **See attached FLU Map and Traffic Circulation Map.**

Comment 6: IAS - Population - Please provide the applicable information for commercial/industrial uses as outlined in Section 910.F.

Response 6: **No specific users of the project have been identified yet. So no analysis of the items in that section is possible.**

Comment 7: Consistency with Comprehensive Plan - Please provide analysis of how this request is consistent with the following sections: 2.113A - Industrial 2.124-F Redevelopment Districts (NOTE: Nichols is listed in this section as a Redevelopment District).

Response 7: **2.113-A – Industrial:**

**The subject site is in a Rural Development Area, and is 420 acres, so is a sizeable area for industrial uses. The will allow ample buffering and internal setbacks from any of the existing or future neighboring developments. This will help mitigate any odor, noise, or lighting that my emanate from the development. It had direct access to Nichols Road, a Rural Major Collector, which is only a mile and a half south of SR 60, a major arterial.**

**2.124-F-Redevelopment District**

**Section e. states: *promote the economic vitality of the community through the development of employment and business opportunities for community residents.***



**Development of industries nearby will greatly enhance the number of quality jobs available to the residents.**

**Comment 8:** Ownership - Although the applicant has submitted deeds and purchase agreements, it is not clear which properties are under what ownership and which deed applies to the respective parcels. It would be helpful if a summary sheet could be prepared that lists the parcel, previous owner, and current owner. Additionally, staff is willing to meet with the applicant to discuss further.

**Response 8:** See attached Ownership Table.

**Comment 9:** 29 Acre Enclave - Please provide a narrative explaining why this acreage is not included.

**Response 9:** This area contains soft, non-structural soils that are of questionable hazardous nature. The applicant did not purchase that area for these reasons.

**Comment 10:** Letter of Authorization - It is not clear whether William T. Mims is authorized to act on behalf of Agrifos, LLC and Agrifos Mining, LLC. Please clarify.

**Response 10:** William T. Mims has a Sales and Purchase Agreement to purchase the properties owner by Agrifos Mining, LLC and Agrifos, LLC included in the CPA submittal. The Letter of Authorization is authorizing David Carter and Kriss Kaye to act on behalf of those entities.

**Surveying Comments:**

**Comment 11:** Please provide a legal description of only the property associated with the Land Use change.

**Response 11:** See attached legal description associated with the FLU change.

We appreciate your cooperation and assistance with this project. If there is anything further you need, please let us know.

**Carter and Kaye Engineering, LLC**



David C. Carter, P.E.  
P.E. License No. 31915



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