

**POLK COUNTY
DEVELOPMENT REVIEW COMMITTEE
STAFF REPORT**

DRC Date: January 29, 2026	Level of Review: Level 3 Review
PC Date: April 1, 2026	Type: Expansion of Non-Conforming Use
BoCC Date: n/a	Case Numbers: LDCU-2025-39
Applicant: Chad Booker P.E. Traditions Engineering	Case Name: Thomas Landing Fish Camp Expansion
	Case Planner: Erik Peterson, AICP

Request:	Conditional Use for expansion of a legally non-conforming Recreational Camping Facility per Section 120.J of the LDC to increase the number of RV/Cabin sites from 20 to 40 and add one more residence and accessory buildings for the campground.
Location:	Between Thomas Fish Camp Road and the shore of Lake Kissimmee, approximately 1½ miles northeast of Sam Keen Road, east of Lightsey Ranch Road, and 17 miles northeast of the city of Lake Wales in Section 3, Township 30, Range 30.
Property Owners:	KDC Forever LLC and Scott L Henderson
Parcel Size (Number):	±15.65 acres (303003-000000-033050& 033020)
Future Land Use:	Agriculture/Residential Rural (A/RR)
Development Area:	Rural Development Area (RDA)
Nearest Municipality:	Lake Wales ±17 miles
DRC Recommendation:	Pending Review
Planning Commission Vote:	Pending Public Hearing

Location Map



Proposed Expansion



Summary:

KDC Forever is a non-profit organization that owns the south portion (± 7.68 acres) of a legally non-conforming recreational camping use on ± 15.65 that was originally approved prior to the adoption of the Land Development Code (LDC). They seek a dedicated number of campsites and support uses and structures for exclusive use by their membership separately from the north portion (± 7.97 acres) of the conditional use approval. This requires Planning Commission approval because the expansion is greater than 20% of structures and activity.

Thomas Landing Fish Camp was originally approved as a Planned Unit Development (PUD 90-20) in September of 1995, but it began operation in the 1980s shortly after the original proprietor purchased it in 1981. It was modified and given a Conditional Use designation in 2002 under approval of CU 02-18 because of its non-conforming status to the LDC. It was again modified in 2004 to reach its current approval of a ± 15.65 -acre Recreational Camping Facility consisting of:

- one single family residence
- one two-bedroom guest cottage
- one mobile home
- ± 12 seat café
- $\pm 1,800$ SF maintenance building
- $\pm 1,100$ SF screened meeting hall
- ± 500 SF bait shop
- one propane tank with dispensing pump
- one gasoline tank with dispensing pump
- boat trailer parking area
- ± 475 -foot pier
- 20 RV or cabin sites with water, septic, and electrical service

The use of the property meets all the requirements of recreational camping except for direct access to a public road or private road meeting County standards. Thomas Landing Fish Camp takes access from Thomas Fish Camp Road, an unpaved access easement without a known maintenance entity which connects to Lightsey Ranch Road, another unpaved access easement that is privately owned and maintained before it reaches Sam Keen Road, a paved County maintained road.

The CU 02-18 property consisted of two parcels and are now under separate ownership. The owner of the north portion and the owners of the south portion disagree with the equal sharing of the current list of use entitlements. Therefore, the owners of the south portion are applying to increase the number of certain entitlements so that they can pursue separate paths to utilizing the property. These include:

- 20 RV or cabin sites with water, septic, and electrical service
- one two-bedroom guest cottage
- 2,400 SF maintenance building
- gasoline tank with dispensing pump
- boat trailer parking area
- ± 475 -foot pier
- two 600 SF bath house/cook sheds
- $\pm 2,400$ SF storage shed/pole barn

There are six (6) criteria in Section 120.J.1.c of the LDC for the Planning Commission to consider when reviewing the requested expansion. These criteria are briefly summarized in Table 11 on page 19 of this report. Findings of Fact are provided on pages 2-6. Recommended Conditions of Approval are listed on pages 7-8. The data and analysis to support each summary statement are

included in pages 8-18 of this report. Although this expansion nearly doubles the intensity of the facility, it is of such low intensity that it will neither overburden the private unpaved access nor become incompatible with neighboring land uses, infrastructure, or environmental conditions. In the end, the result of this approval will expand the total development and provide a separate autonomous set of entitlements for each property giving the property owners the ability to seek approvals without the consent of the other property owner. Staff recommends approval with conditions that provide this clarity.

Findings of Fact

- *The request is for expansion of a legally non-conforming Recreational Camping Facility per Section 120.J of the LDC to increase the number of RV/Cabin sites from 20 to 40 and add one more residence and accessory buildings for the campground. on ±15.65 acres in the A/RR district.*
- *Thomas Landing Fish Camp is non-conforming to the LDC Recreational Camping standards due to the lack of direct access to a paved County road or private road meeting County standards.*
- *The site and surrounding properties are in a Rural Development Area (RDA), which is an area “characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments” according to POLICY 2.108-A1 of the Comprehensive Plan. The site is in a Rural Development Area (RDA), which is an area “characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments,” according to POLICY 2.108-A1 of the Comprehensive Plan.*
- *The site and surrounding properties are Agricultural Residential Rural (A/RR) on the Comprehensive Plan Future Land Use Map. POLICY 2.114-A of the Comprehensive Plan states that the “Polk County recognizes the importance of the agriculture industry as a healthy and competitive force in the national and international marketplace and, therefore, shall encourage the continuation of productive agricultural uses and provide for the placement of low-density residential development within unincorporated rural areas through:*
 - a. the establishment and mapping of Agriculture/Residential-Rural (A/RR), and*
 - b. the establishment of policies to govern the development of land within the A/RR land use category.”*
- *Comprehensive Plan POLICY 2.125-E1: COMMUNITY FACILITIES' PERMITTED USES states that “Community Facilities shall be allowed in all land use classifications, unless specifically prohibited elsewhere in this Comprehensive Plan, as a conditional use subject to the location and development controls established in Policy 2.125-E2 and as further regulated by the Land Development Code. The types of community facilities are as follows:*
 - a. Type A facilities are governmental facilities necessary to support existing and proposed development, and shall include, but are not limited to:*
 - 1. police, fire, and emergency medical facilities,*
 - 2. cultural facilities, and libraries; and*
 - 3. government-owned cemeteries.*

- b. *Type B facilities are non-governmental facilities which provide needed public services, and shall include, but are not limited to:*
 - 1. *churches, cemeteries, and related facilities;*
 - 2. *residential-treatment facilities and emergency shelters;*
 - 3. *convents and monasteries;*
 - 4. *day care and other child-care facilities; and,*
 - 5. *lodges and retreats;*
 - c. *Type C facilities are temporary facilities necessary to the improvement of public facilities by private contractors and shall include but are not limited to:*
 - 1. *temporary asphalt or concrete mixing plants limited to less than a nine (9) month operation. (Note: Asphalt and concrete mixing plants are prohibited within the Green Swamp Area of Critical State Concern.)”*
 - d. *Type D facilities are elementary, middle and high schools, both public and private.*
 - e. *Type E facilities are all types of recreation activities and associated infrastructure.*
- *POLICY 2.129-A.2.c of the Comprehensive Plan requires that the Land Development Code provides “regulations and procedures to address existing development and potential development, to include, but not limited to:*
 - a) *Existing non-conformities, including: uses, lots, structures, and site characteristics (parking, signage, access, etc.). Such regulations shall include provisions for the elimination or reduction of such non-conformities through abandoned or destroyed "grandfathered" discontinuance provisions and through the elimination of non-conforming zoning districts; and*
 - b) *Recognition of legal non-conformities to include: rebuilding rights; expansion rights; and use changes.”*
 - *Land Development Code (LDC) Section 120.J.c provides for following criteria for reviewing the expansion of a legally non-conforming non-residential use:*
 - i. *The degree to which the non-conformity can become more conforming;*
 - ii. *The extent of a government's obligation or liabilities including, but not limited to, infrastructure improvement, infrastructure maintenance, and public safety;*
 - iii. *The potential impact that the expansion may pose to neighboring properties;*
 - iv. *The extent of the use's longevity (i.e., how long has it been there and how long is it to continue at its location);*
 - v. *The applicant's future plans for the property relative to the County's plans; and,*
 - vi. *The improved development standards or infrastructure that may result from expansion of the use.*
 - *LDC Section 303 provides the following standards for Recreational Camping. It states that “Recreational campsites are intended to be located and designed to afford the users an opportunity to camp in a quiet, uncongested, and natural setting. In addition to all applicable regulations, the following standards shall apply to recreational camping uses:*

1. *The camping area or park in which the camping area is located shall have direct access to a paved County road or private road meeting County standards. Camping areas within larger park or resort facilities may be located on internal local roads.*
 2. *The maximum intensity of recreational camping shall be no greater than four (4) campsites per acre. Uses exceeding this intensity shall be defined and permitted as an RV Park meeting the standards required by this code.*
 3. *The minimum area allowable for a campground shall be at least five (5) acres.*
 4. *Bathhouses (including showers, toilets, and sinks) and emergency shelters shall be provided within the campground to accommodate its occupancy when at full capacity.*
 5. *For each camping and RV space, administrative office, maintenance facility, security or administrative residence, or any other similar use, a connection to a central potable water system shall be provided. Wastewater treatment may be provided to individual campsites or may have a central collection facility onsite. Central collection facilities shall be setback a minimum of 300 feet from any campsite or property line.*
 6. *Within a camping area, the following accessory uses are permitted:*
 - a. *Recreation amenities restricted to use by guests, including pools, tennis and shuffleboard courts, recreation rooms, equestrian facilities, nature and walking trails, pedestrian and bicycle paths, playgrounds, tot lots, docks and similar facilities;*
 - b. *Gate houses or similar facilities designed to provide security to the park and campground;*
 - c. *Maintenance facilities;*
 - d. *Administrative office space necessary for operation of the park and campground; and commercial or retail uses located internal to the park and restricted to use by guests, including convenience food and beverage items and recreational vehicle parts and ancillary commercial uses.*
 - e. *Accessory commercial and retail uses shall be located and accessed via the internal campground system unless the camping area is part of a larger park facility.*
 7. *Permanent residential use of any camping area is prohibited, other than security or administration quarters that may be established in the park, pursuant to LDC Section 206.B. RV spaces providing for stays of longer than 30 days shall only be permitted as an RV Park meeting the standards required by this code.*
 8. *Parking of recreational vehicles in areas not designated for such use is prohibited.*
 9. *The storage of recreational vehicles is prohibited.*
 10. *Primitive camping on private and public lands is exempted from this section."*
- **Lodges and Retreats** is a use defined in Chapter 10 of the LDC as *"Gathering places, such as a company retreat or a fraternal lodge, which are not open to the general public and whose use is limited to the membership, and their guests, of the owning organization. These sites are intended to provide a meeting place and resource-based recreational site for the organization, and typically provide lodging and kitchen facilities, as well as meeting rooms. These facilities may be rented to other similar private organizations."*

- **Resourced Based Recreation** is term defined in Chapter 10 of the LDC as “*Outdoor recreation activities that are directly associated with environmental or natural resources and can include both active and passive recreation activities.*”
- **Recreational Camping** is a use defined in Chapter 10 of the LDC as “*Land under unified ownership and management which has been planned, designed, and constructed for the placement of Recreational Vehicles, cabins, and/or tents for short-term occupancy of spaces rented from the owner for recreational purposes, and typically located away from urban areas.*”
- *Thomas Landing Fish Camp was established in 1990 through approval of PUD 90-20. It was expanded in 1995. After adoption of the LDC it was converted to a conditional use with its third expansion in 2002 under case number CU 02-18. The current approval includes:*
 - *one single family residence*
 - *one two-bedroom guest cottage*
 - *one mobile home*
 - *12 ± seat café*
 - *1,800 ± s.f. maintenance building,*
 - *1,100 ± s.f. screened meeting hall*
 - *500 ± s.f. bait shop*
 - *one propane tank with dispensing pump*
 - *one gasoline tank with dispensing pump*
 - *boat trailer parking area,*
 - *475 ± foot pier and*
 - *20 RV/camp sites with water, sewer, and electrical service.*
- *Fire Rescue response to this site is from Polk County Fire Rescue Station 27, at 6221 Hogan Lane, in Indian Lake Estates which is approximately 10 miles in travel distance with a response time average of 20 minutes.*
- *Ambulance (EMS) response to this site is from Polk County Fire Rescue Station 14, at 10399 Leisure Lane West in Nalcrest which is approximately 11 miles in travel distance with a response time average of 20 minutes.*
- *The area is served by the Polk County Sheriff’s Office Southeast District Command at 4011 Sgt. Mary Campbell Way near Lake Wales which is approximately 26 miles driving distance from the site and on average 10 minutes in response time.*
- *There is no public potable water or wastewater infrastructure within an available distance to the site.*
- *The site accesses Sam Keen Road which is a rural minor collector road through two unpaved private easements: Lightsey Ranch Road and Thomas Landing Road. Both are privately maintained.*
- *Approximately 87% of the subject property is located within the 100-year flood zone.*
- *All soil types onsite have severe limitations for camping areas and septic tank absorption fields.*
- *The site is located within a Nutrient Restoration Plan Overlay district designated under a Basin Management Plan (BMAP) by the Florida Department of Environmental Protection (FDEP)*

- *According to the Polk County Endangered Habitat Map (Source: Florida Natural Areas Inventory, 2006 & 2011, 2016), the site is located within a one-mile radius of an endangered animal species sighting.*

Development Review Committee Recommendation: Based on the information provided by the applicant, recent site visits, 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 LDCU-2025-39 with conditions.**

CONDITIONS OF APPROVAL

Based upon the findings of fact, the DRC recommends APPROVAL of LDCU-2025-39 with the following conditions:

1. This Conditional Use approval shall be for expansion of a legally non-conforming Recreational Camping Facility per Section 120.J of the LDC to increase the number of RV/Cabin sites from 20 to 40 and add more accessory buildings on ±15.65 acres in the A/RR district.
2. The conditional use entitlements shall be separated into two phases: north and south.
3. The North Phase shall consist of the following:
 - one single family residence,
 - one two-bedroom guest cottage
 - one mobile home
 - 12 ± seat café
 - 1,800 ± s.f. maintenance building,
 - 1,100 ± s.f. screened meeting hall
 - 500 ± s.f. bait shop
 - one propane tank with dispensing pump
 - one gasoline tank with dispensing pump
 - boat trailer parking area,
 - 475 ± foot pier and
 - 20 RV/camp sites with water, sewer, and electrical service.
3. The South Phase shall consist of the following:
 - 20 RV or cabin sites with water, septic, and electrical service
 - one two-bedroom guest cottage
 - 2,400 SF maintenance building
 - gasoline tank with dispensing pump
 - boat trailer parking area
 - ±475-foot pier
 - two 600 SF bath house/cook sheds
 - ±2,400 SF storage shed/pole barn
4. Accessory structures and uses consistent with Section 303 Recreational Camping accessory uses may be added to either phase through Minor Modification in accordance with Section 906.E.

5. Access to the South Phase of the shall be limited through the southern site entrance shown on the binding site plan in Exhibit 6.
6. Because of the isolated location, limited impervious surfaces, and lack of public infrastructure, Level 2 Review plans are not required provided that no RV spaces or structures are located within 50 feet of a land property line. The list of proposed structures within the binding site plan can be constructed and inspected through building permits. Minor modifications to the binding site plans shall be reviewed through the Development Review Committee (DRC) through a Level 1 Review.
7. Maritime structures on Lake Kissimmee shall meet state and federal requirements and Section 610 of the Land Development Code.
8. Public Safety staff or Fire Marshal's Office staff may close the facility if the access road is not adequately maintained for all public safety vehicles.
9. All previous conditions of PUD 90-20 and CU 02-18 shall be null and void.

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 4 Review and only for those development decisions within the Board of County Commissioners' jurisdiction. Building permits will be required for improvements to 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>Northwest: Agricultural/ Residential Rural (A/RR) Lightsey Ranch Cow pasture and Conservation Easement</p>	<p>North: A/RR South Florida Water Management District Conservation lands</p>	<p>Northeast: Osceola County Lake Kissimmee</p>
<p>West: A/RR Lightsey Ranch Cow pasture and Conservation Easement</p>	<p>Subject Property: A/RR Three (3) residential dwellings 20 RV/Camp Sites Café, Bait Shop, recreation facilities and accessory structures</p>	<p>East: Osceola County Lake Kissimmee</p>
<p>Southwest: A/RR Lightsey Ranch Cow pasture and Conservation Easement Unpermitted seasonal structures and RVs</p>	<p>South: A/RR Private residence dingle-family dwelling built in 1901, South Florida Water Management District Conservation lands</p>	<p>Southeast: Osceola County Lake Kissimmee</p>

There is a single-family residence immediately to the south on nearly seven acres. The property appraiser’s website estimates its origin to be 1901. It appears to be of seasonal use. Deed restrictions state one resort cabin or residential home. The rest of the surrounding area is predominantly pasture and pristine wilderness. There are a few properties with makeshift structures, RVs, carports, and sheds referred to as hunting camps. Some have electrical connections and a few have electrical meters. County Building Division and Property Appraiser’s Office have no records of development on these properties. They are taxed as inaccessible lands which currently come to \$18.72 per year on the ±1¼ acre properties. Current taxation on Thomas Fish Camp property is approximately \$8,000 per year on the combined ±15 acres.

Much of the surrounding property is owned by the South Florida Water Management district which borders the lake. However, much more of the surrounding property is owned by the Lightsey Cattle Company. In Polk County the Lightsey Cattle Company consists of four separate ranches. This is the XL Ranch. The others are Tiger Lake Ranch, West Lake Wales Ranch, and Brahma Island. According to their website, Lightsey Cattle Company restored XL Ranch by partnering with the Nature Conservancy on a pilot program that restored the natural water flow on the property and welcomed back wildlife and thriving vegetation.

Compatibility with the Surrounding Land Uses, Infrastructure, and Environmental Conditions:

This request is for expansion of a Recreational Camping site that lacks the current access requirements put in place after its initial development. Thoms Landing Fish Camp originated with a house, a few cottages, a mobile home, bait shop, entertainment venue, boat ramp, boat dock, fueling facility (boat and LP gas), and primitive camping. Through Planning Commission approval, 20 RV campsites were added in 2002 under the expansion of a non-conforming use process. Now, another 20 are requested. With the addition, more accessory structures and another residence are

included as well. Staff find this request is compatible with surrounding land uses, the rural level of infrastructure available, and the environmental limitations of the site. For over 40 years Thomas Landing Fish Camp has existed in this location with no use or condition on nearby properties being unduly negatively impacted by its operation. This expansion of the number of campsites will not directly or indirectly result in adverse impacts upon another use or condition nearby.

A. Land Uses:

The Agricultural/Residential Rural (A/RR) district allowable base density for development is one dwelling per five acres. If there are certain levels of urban services available and other conditions are met, up to one dwelling unit per acre may be permitted. However, there are no urban services available for miles in this area. This area is ideal for ranching and resource based recreation. With just one visit to the property, it is evident that this site is ideal for recreational camping with its lake access and pristine surroundings. Recreational Camping is a use that may be approved in the A/RR district by the Planning Commission through a Level 3 Review. This low-intensity resource based recreational use allows up to four campsites per acre provided certain development standards and Health Department approvals are met.

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.”

Thomas Landing Fish Camp originated in 1990. It became non-conforming with regard to access in 1992 with the adoption of an ordinance that requires all forms of development to have direct access to a paved road. An expansion for the camp was approved in 2002 under review of this same non-conformity. Since then the access has become more stable but remains unpaved. This request is for expansion of the number of campsites from 20 to 40. While Recreational Camping requires Planning Commission approval in the A/RR district, this location and intensity meets all of the criteria but one: direct access to a paved road. Section 120 recognizes legal non-conforming uses, structures, lot size, density, and development standards. Section 120.J sets forth a process for evaluating proposals for expansion of a non-conforming use. This includes six criteria for which to evaluate expansion requests. Staff find it meets these criteria. Each one is specifically addressed throughout this report and summarized in Table 11.

B. Infrastructure:

This area is truly rural. The County extends very few services to this area and has no plans in the future for infrastructure expansion. There is no public water or wastewater services in the area. There is no public transit. Public schools are very far away. Public safety services are closer but still beyond a distance suitable for urban development. The roadway network has a lot of capacity but is over a mile from this site. The lack of urban services helps to discourage higher development activity in the area. This facility operates at a very low intensity amongst an environmentally protected area. While recreational facilities have a higher need for public safety services, the intensity of this recreational camping use after expansion is still very low and so is the level of risk.

C. Environmental Conditions

Aside from the non-conforming access, the greatest site limitation is the vast amount of area within the 100-year flood hazard area. Like with any waterbody, wetlands exist along the shoreline. The soils are also somewhat of a limitation that will curtail the use of onsite septage disposal and the foundations of permanent structures. The site is surrounded by past protected species sightings. The environmental conditions of the site ensure that the use is of low scale and intensity. This low-

intensity resource-based recreational camping use is ideal for these environmental limitations. The visitors seek this facility for the connections to nature and distance from urban areas but do not depend on them for year-round housing.

Nearest and Zoned Elementary, Middle, and High School

The property is zoned for middle and high schools in Frostproof and Lake Wales. These are Ben Hill Griffin Elementary north of Frostproof and McLaughlin Middle/High School in south central Lake Wales. All are the closest schools. However, recreational camping has no impact on school capacity and no physical impacts being over 20 miles away.

Table 2

Name of School	Annual Estimated Demand	Distance from subject site	School Capacity
Ben Hill Griffin Elementary	0	±26 miles driving distance from entrance to entrance	81%
McLaughlin Middle School	0	±20 miles driving distance from entrance to entrance	88%
McLaughlin Academy High School	0	±20 miles driving distance from entrance to entrance	32%

Source: Polk County School Board, Duncan Associates Educational Facility Impact Fee Study, GIS

Nearest Sheriff, Fire, and EMS Station

Public Safety services are located a significant distance from this area, which is expected due to its extremely rural nature. The level of intensity for recreational camping is appropriate for the Rural Development Area (RDA). There are no fire hydrants nearby, but campsites will be spaced far enough apart to isolate in the event of fire. The site is very open. Trees line the perimeter.

Table 3

	Name of Station	Distance	Response Time*
Sheriff	Southeast District Command (4011 Sgt. Mary Campbell Way near Lake Wales)	±26 miles	10 minutes
Fire	Polk County Fire Rescue Station 27, 6221 Hogan Lane, in Indian Lake Estates	±10 miles	20 minutes
EMS	Polk County Fire Rescue Station 14, 10399 Leisure Lane West in Nalcrest	±11 miles	20 minutes

Source: Polk County Sheriff's Office and Public Safety

*Response times are based on when the station receives the call and not from when the call is made to 911.

The nearest Sheriff's substation is the Southwest District Command at 4120 U.S. Highway 98, south of Lakeland next to Polk State College, 26 miles driving distance from the site. Sheriff response times are not as much a function of the distance to the nearest sheriff's substation rather more a function of the overall number of patrol officers within the County. However, patrol coverage is less in these more rural areas of the County. Since this site is accessible only from private gated easements, regular patrols are unlikely. In addition to Thomas Landing, there are five other addressed locations on Thomas Landing Road. In the event of an emergency, Polk County Sheriff's staff can respond to those locations.

Key to this review is the condition of the access easement. It is vital that public safety staff be able to access this site efficiently and without damage to vehicles. On a recent site visit, staff found the access to be of adequate width and in fair condition. A condition of approval is included in the

recommendation that gives public safety officials the ability to close the facility if the access is not properly maintained to public safety access standards. The site has been used as a point of access for public safety staff in the past for boat rescues on the lake. Although nearly all of the shoreline around it is publicly owned land, Thomas Landing has the only boat ramp and dock for miles in either direction.

Water and Wastewater Demand and Capacity:

There is no public water or wastewater services available in this area and there are no plans for any in the future. This is characteristic of the Rural Development Area (RDA). Expansion will require an additional water well and onsite septage disposal system. The site is in an area where the use of septic tanks is highly restricted. A more advanced system may be required to serve the needs of more development.

A. Estimated Demand and Service Provider:

There is no public potable water or wastewater service available in the remote vicinity. The closest is over ten miles away. Recreational camping does not need to be connected to public water or wastewater services. They are typically self-sustaining. For efficiency and marketing, one central well system that serves the campsites is best. Wastewater can be handled centrally or with one dumpsite septic system for RVs. Bath facilities are required regardless. But central systems that serve the campsites or cabins make the camping facility more appealing to a broader spectrum of consumers.

Table 4

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted A/RR/CU 02-18	Maximum Permissible in the district A/RR	Proposed Plan
15.65± acres A/RR			
Permitted Intensity	2 single-family units 1 mobile home 20 campsites	3 single-family units 62 campsites	3 single-family units 1 mobile home 40 campsites
Potable Water Consumption (GPD)	4,675 GPD	13,026 GPD	8,885 GPD
Wastewater Generation (GPD)	4,180 GPD	11,760 GPD	7,980 GPD

Source: Polk County Concurrency Manual & Polk County Utilities: Transient RV space = 198 GPD potable water demand and 180 GPD wastewater output, Single-Family = 250 GPD water and 200 GPD wastewater, Mobile home = 215 GPD water and 180 GPD wastewater.

Polk County Utilities estimates that transient RV or camping spaces maximum potable water usage is 198 gallons per day (GPD) and wastewater output is 180 GPD. But utility systems have to be designed to handle the most extreme conditions. Actual use of camping facilities is much lower on average usage. This is due to the seasonal nature of recreational uses. Utilization varies for weekdays vs. weekends, summer vs. winter, or spring/summer break vs. school days. The applicants for this expansion intend to use this facility primarily for hunting seasons. There will only be a limited amount of time in which the facility will be in full use during the year.

B. Available Capacity:

Both the well and water system and sanitary waste system will be reviewed and approved under the Florida Department of Environmental Protection (FDEP). This property and all that surrounds it are under a Basin Management Plan (BMAP) for the Kissimmee River basin. Based on volume and

flow, FDEP may require a higher level of treatment on the wastewater system. System costs may limit the capacity and usage. It could even affect the number of camping spaces.

C. Planned Improvements:

Campsites may require services and hook-ups. A central water system will be most efficient. A bathhouse(s) will be required regardless. The site plan for the south half shows the placement of these facilities. The wastewater treatment may have to be designed and built to a higher treatment level due to the BMAP requirements. There will be no public dedication of any infrastructure for this use.

Roadways/ Transportation Network

There is ample capacity on the public roadway network to serve an additional 20 campsites. However, the camp is nearly two miles to the nearest public road access. The sole reason this development is non-conforming is because it lacks direct access to a public road.

A. Estimated Demand:

There will be a limited increase in transportation demand as a result of this approval. The Institute of Traffic Engineers estimates the additional 20 campsites will add an average of 21 daily trips to the roadways. This is an approximately 42% increase to current traffic estimates on unpaved Lightsey Ranch Road and unpaved Thomas Landing Road. The following table provides a comparison between the current approval and the requested expansion of the non-conforming use.

Table 5

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted A/RR/CU 02-18	Maximum Permissible in the district A/RR	Proposed Plan
15.65± acres A/RR			
Permitted Intensity	2 single-family units 1 mobile home 20 campsites	3 single-family units 62 campsites	3 single-family units 1 mobile home 40 campsites
Average Annual Daily Trips (AADT)	45	88	72
PM Peak Hour Trips	5	9	8

Source: Institute of Transportation Engineers Trip Generation Manual 12th edition Single-family = 7.81 AADT, 1 PM peak, 100% new trips; Mobile Home = 7.87 AADT, 0.48 PM peak, 100% new, Campsite = 1.01 AADT, 0.09 PM peak, 100% new.

This request will not require either a major or minor traffic study since the increase in average annual daily trip rate (AADT) will be less than 50 trips per day.

B. Available Capacity:

Sam Keen Road does not have enough vehicle traffic on it to warrant monitoring. State Road 60 is the only roadway tracked east of Lake Wales.

Table 6

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard
5910E	State Road 60 From: Stokes Road To: County Road 630	B	1,448	C

Table 6

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard
5910W	State Road 60 From: County Road 630 To: Stokes Road	B	1,478	C

Source: Polk County Transportation Planning Organization, Roadway Network Database January 17, 2025

Table 5 shows that the expansion of Thomas Landing Fish Camp will result in an additional three (3) PM Peak Hour trips. The roadway has over 1,400 trips of capacity in either direction. Given the ample amount of capacity on the roadway, the impacts of this approval will be insignificant on the network.

C. Roadway Conditions

Based upon a recent site visit, Sam Keen Road is in above average condition. State Road 60 is being resurfaced from County Road 630 to Stokes Road. Lightsey Ranch Road is a well maintained unpaved private easement. Thomas Landing Road is unpaved also and moderately well maintained. There are several divots that require avoidance by standard automobiles. An additional 21 vehicles per day may benefit the maintenance of Thomas Landing Road because it will provide more compaction to the surface. Unpaved roads that have very little daily traffic suffer more from lack of use than they do from overuse. The County is only responsible for the maintenance of Sam Keen Road. State Road 60 is maintained by the Florida Department of Transportation (FDOT) Lightsey Ranch Road is maintained by the Lightsey Cattle Company. Thomas Landing Road is maintained by the owner of the north portion of Thomas Landing Fish Camp. If this expansion is approved, the owners of the south portion should bear some maintenance responsibility of Thomas Landing Road.

D. Planned Improvements:

This approval requires no roadway, sidewalk, or drainage improvements to a County facility. This request is to expand the use of private unpaved access to an existing Recreational Camping use.

E. Mass Transit

There is no mass transit available east of Lake Wales. This use is not intended for areas served by transit.

F. Sidewalks

There are no sidewalks on Sam Keen Road. Sidewalks are not a requirement in the Rural Development Area (RDA).

Park Facilities:

This site provides no public access to Lake Kissimmee. It is for members and patrons only. There are two locations for public recreational access to Lake Kissimmee in Polk County: Coleman Landing on the south end and Lake Kissimmee State Park on the north. Thomas Landing is in between them. That is why it has been used as a point of access for public safety staff in the past for boat rescues on the lake. Although nearly all of the shoreline around it is publicly owned land, Thomas Landing has the only boat ramp and dock for miles in either direction.

A. Location:

Coleman Landing at Shady Oaks Recreation Area, at 1450 Shady Oak Drive (eight miles by boat, 18 by car), is the closest County boat access to Lake Kissimmee. Lake Rosalie Park and Campground, at 2925 Rosalie Lake Road (nine miles by boat, 11 miles by car) are the closest public parks. Both have boat access and camping facilities.

B. Services:

Coleman Landing has Bank/Pier Fishing, Boat Launching Site, Campground, Pavilion, Picnic Area, Restrooms. Lake Rosalie Park has Boat Launching Site, Campground, Restrooms.

C. Planned Improvements

There are no recreation improvements scheduled for this area of the County in the 5-year Community Investment Program.

D. Environmental Lands

The area is surrounded by publicly owned environmental lands and conservation easements. However, they are not open to the general public and are not publicly accessible (Exhibit 7).

Environmental Conditions

Aside from the non-conforming access, the greatest site limitation is the vast amount of the site within the 100-year flood hazard area. Like with any waterbody, wetlands exist along the shoreline. The soils are also somewhat of a limitation that will curtail the use of onsite septage disposal and the foundations of permanent structures. The site is surrounded by past protected species sightings. The environmental conditions of the site ensure that the use is of low scale and intensity. This site is well suited for recreational, resourced based, camping. The limitations do not pose a significant threat to brief stays. In the event of inclement weather, a campground can be efficiently evacuated. Permanent residences are not as easily evacuated, and their occupants may depend on them more.

A. Surface Water:

The site abuts Lake Kissimmee. The Lake Kissimmee basin is under a management plan to reduce nitrate loads by the Florida Department of Environmental Protection (FDEP). There are many limitations on development in these areas. Most apply to wastewater discharges which will limit or restrict the use of septic tanks. The LDC also has restrictions on development in Section 610. Non-maritime structures are required to be set back 50 feet landward from the 10-year flood zone which is approximately the location of the Ordinary High-Water Line (OHWL).

B. Wetlands/Floodplains:

All but approximately a two acre strip along the western boundary of the site is within the 100-year flood hazard area, according to the Flood Insurance Rate Maps (FIRM) from the Federal Emergency Management Agency (FEMA) and National Wetlands Inventory (NWI). The base flood elevation (BFE) is 54 feet above mean sea level (MSL). The majority of the property is approximately 53 feet above MSL. This property is not a good location for permanent residents.

However, it is suitable for recreational use, especially campsites that can be evacuated in the event of heavy rainfall.

C. Soils:

The area proposed for the additional 20 campsites will be located on Bassinger Fine Sand, according to the Soil Survey of Polk County, Florida, United States Department of Agriculture (USDA), Soil Conservation Service. This soil type has severe limitations for camp areas and septic tanks. However, it is no worse than the other soil types on the 15.65-acre fish camp site. The pond in the center of the site was created in the early 1980s, and the soil was spread across the site to raise the level of the land. This is not reflected in the USDA soil survey because the fieldwork for the survey was conducted prior to the excavation of the pond.

Table 8

Soil Name	Limitations to Camp Areas	Septic Tank Absorption Field Limitations	% of Site (approximate)
Adamsville Fine Sand	Severe: too sandy	Severe: wetness, poor filter	28%
Basinger Fine Sand	Severe: ponding	Severe: ponding, poor filter	61%
Bassinger Mucky Fine Sands (depressional)	Severe: ponding	Severe: ponding, poor filter	11%

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

This soil data does not prevent the site from increasing the intensity of campsites. It speaks more to the limitations use of those sites will face. The ground will be adequate for seasonal and occasional use, but it will not support permanent or constant use. The proposed use of this camp is seasonal according to the application.

D. Protected Species

The site is within a mile radius of all types of endangered animal species sightings according to the Florida Natural Areas Inventory of 2002, 2006, and 2012. That is why so much of the surrounding area has been acquired by the state or placed in conservation easements. But light camping facilities can be compatible with the protection of endangered species, especially for ecotourism. Use of this facility is limited by the lack of public access, which is the non-conformity under review. The private easement ensures that visitation will be limited and thereby work to protect the endangered species that inhabit the area.

E. Archeological Resources:

There are archeological resources in the area farther to the south of the site near Grape Hammock which once held the original Kissimmee River crossing and ferry boat launch. No known historic structures or artifacts have been reported on this site.

F. Wells (Public/Private)

The closest public water system is located at Indian Lake Estates over 6½ miles to the south. There are several individual agricultural wells nearby, but none of them are close enough to be adversely impacted by increasing the number of campsites. There is an active well on the north portion of the property that serves the three permanent dwellings that were part of the original 1990 PUD approval.

G. Airports:

The site is not within any Airport Buffer Zones. The closest airport is Lake Wales Municipal Airport, just over 18 miles to the west. This approval will have no adverse effects on airway traffic.

Economic Factors:

From the 1980s through the early 2010s, Thomas Landing Fish Camp operated as a low scale marina and campground. The proprietor (Earl Thomas) operated a bait shop, entertainment venue, and provided fueling for watercraft at the end of the dock. There were RV hookups on the north and south sides surrounding the internal pond in the center of the site. The proprietor passed away in 2016 and the two properties that comprised the fish camp were sold to different owners at different times. The current owners of the north parcel have actively maintained the grandfather rights since 2020. The south parcel has had limited use since 2017. It has been used for primitive camping, and the dock and boat ramp have been maintained and actively utilized.

The marina functions (boat fueling and portage) and bait shop of the recreational camping use are no longer in operation but will remain a future option for either north or south portions. The owner of the north portion of the site uses the property for private functions and has recently replaced the mobile home with a newer model. He desires to expand in the future by adding cottages for vacation rental. KDC Forever, owners of the south side, are seeking to establish campsites for members of the organization with supporting accessory structures such as bathhouses and primitive dining facilities. Their peak use will come during hunting seasons for waterfowl. During the off season, it will be used intermittently by the members and their guests for camping and fishing on weekends and holidays. However, the conditions of approval do not restrict future ownership classifications. Neither portion of the property is limited to their current intentions rather only the conditions of approval placed on them by the Planning Commission.

The site's value and marketability come from its exclusive location on the lakefront surrounded by preservation lands. This creates an isolated and peaceful retreat for visitors. It is also the only boat access to Lake Kissimmee for over four miles to the north and nine miles to the south. This provides better access to certain fishing areas on the lake thereby providing nearly exclusive use to much of the western shoreline. The site's value is maintained by its exclusivity. It is in the interest of both property owners to limit the use of the facility to small groups. That way both properties can enjoy the same aesthetic qualities of their properties without diminishing the value of the other. This approval grants the south portion specific rights while not depriving the owner of the north portion of any vested rights. Both properties maintain the marketability each thought they had when they made their original purchase of their land.

Consistency with the Comprehensive Plan, LDC, and Other County Ordinances:

The site is located in the Rural Development Area (RDA), which is the area that *"is characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments."* according to POLICY 2.108-A1 of the Comprehensive Plan. The site is nearly two miles from the closest County right-of-way. There are very limited public services provided to the camping facility.

The subject property is designated Agricultural/Residential Rural on the Future Land Use Map. The base density of the land use district is one dwelling per five acres. Recreational Camping is

permissible through Planning Commission approval because it is classified as a Community Facility under POLCY 2.125-E1 of the Comprehensive Plan which states that “*Community Facilities shall be allowed in all land use classifications.*” There are five classifications (A-E) of Community Facilities:

- Type A facilities are governmental facilities necessary to support existing and proposed development
- Type B facilities are non-governmental facilities which provide needed public services
- Type C facilities are temporary facilities necessary for the improvement of public facilities by private contractors
- Type D facilities are elementary, middle, and high schools, both public and private.
- Type E facilities are all types of recreation activities and associated infrastructure.

Thomas Landing Fish Camp falls within two types of Community Facilities. Type E because it is a recreational facility and Type B because it is a retreat for a non-profit organization. When considering new development or the expansion of existing development, Comprehensive Plan SECTION 2.102 requires the proposal to be reviewed for compatibility, location, distribution, timing, and adequate public facilities. These have been addressed throughout this staff report and are summarized in Table 9 to follow.

POLICY 2.129-A2.c of the Comprehensive Plan requires that the Land Development Code provides regulations and procedures to address existing development and legal non-conforming development including rebuilding rights; expansion rights; and use changes.

Section 205, Table 2.1 of the Land Development Code (LDC) allows Recreational Camping in the A/RR district as a conditional use if approved by the Planning Commission through a Level 3 Review. Section 303 of the LDC stipulates conditions by which a Recreational Camping use may locate and operate. Thomas Landing Fish Camp meets all of the conditions but one: “*The camping area or park in which the camping area is located shall have direct access to a paved County road or private road meeting County standards.*” This was not a requirement of the Minimum Development Standards for Mobile home Parks, RV Parks, Campgrounds, and Fishing Resorts Ordinance (72-13) or the Zoning Ordinance (83-2) for camping areas when the facility was first approved in 1990. It was not until Ordinance 92-05 was adopted that this became a requirement for all land uses. Therefore, this is a legally non-conforming use by virtue of its lack of direct access to a paved County Road or private road meeting County standards. Neither Lightsey Ranch Road nor Thomas Landing Road meet the current County standards for roadway access.

Section 120 of the Land Development Code is dedicated to addressing every question regarding legal, non-conforming, properties, structures, development standards, and land uses. Section 120.J sets forth a process for expanding legally non-conforming development. The Planning Commission may grant an expansion in the intensity of a non-residential development’s legal non-conformity after consideration of six criteria. These criteria have been addressed throughout this report and summarized in Table 11 to follow.

Table 9

Comprehensive Plan Policy	Consistency Analysis
<p>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.</p>	<p><i>The request is equally compatible with neighboring properties and the area as a whole. Much of the area is under public ownership for purposes of conservation or conservation easement. There is also land under agricultural usage abutting and nearby. There is a single-family dwelling abutting the south property line, but it is used for recreational purposes. There are a few other properties in the area with recreational structures and vehicles owned by individuals.</i></p>
<p>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.</p>	<p><i>The reason why this facility is called Thomas Landing Fish Camp is because of its orientation to the lake and its ideal fishing conditions. The only drawback to this location is its distance to a paved public road which is the primary focus of this review.</i></p>
<p>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.</p>	<p><i>This is a legally non-conforming use that is of such a low intensity and scale that it has been approved in the past without direct access to a paved public road. Although the request is to nearly double the intensity, it is low enough that doubling does not change the dynamic of its subtle impact on the area.</i></p>
<p>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.</p>	<p><i>This use has functioned in this location for over 35 years. This modification will enable it to continue for many years into the future as a private, resource-based, recreational camping facility.</i></p>
<p>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).</p>	<p><i>While this remote location is far from public safety services, the demand for them is low. This facility is for limited use, and its intensity is very low. This results in low risk for the need for higher levels of public safety services.</i></p>

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 10 in accordance with Section 906.D.7 of the Land Development Code.

Table 10

<p>The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:</p>	
<p>Whether the proposed development is consistent with all relevant requirements of this Code;</p>	<p><i>Yes, this request is consistent with the LDC, specifically Sections 120.J and 906.D.</i></p>
<p>Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;</p>	<p><i>SECTION 2.125-E - COMMUNITY FACILITIES classifies this use under Type B and Type E community facilities. It is a retreat with recreation activities and associated infrastructure. It is conforming to the Comprehensive Plan, but it is non-conforming with regard to the development</i></p>

Table 10

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>standards in the LDC.</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. This is a low-volume use surrounded by conservation and agricultural properties. It's also a resource-based form of recreation next to Lake Kissimmee, a substantial recreational resource.</i>
How the concurrency requirements will be met, if the development were built.	<i>An increase in the number of campsites from 20 to 40 is still below 50 AADT. This does not trigger the need for even a Minor Traffic Study. There is no public water or wastewater required. Increase in impervious surface is insignificant given the size of the property. There will be no concurrency review needed.</i>

This request will have very little impact on abutting properties and the area as a whole. Most of the surrounding lands are in conservation or agriculture. The increase from 20 campsites to 40 is not likely to overburden the easement access. Staff consider 40 seasonal campsites to be a low-volume land use. Even on a peak day, it will not likely exceed 50 vehicle trips.

Table 11

The Planning Commission, in the review of Expansion of Non-residential Non-Conforming Use, shall consider the following factors in accordance with Section 120.J.1.c of the LDC:	
The degree to which the non-conformity can become more conforming;	<i>Access is improved and more restricted. Since the last expansion in 2002, the access easement that serves the site has become more stable and compacted. Past and current owners of the camp have added more base material to support all types of vehicles. Access to the easement is also more limited. The entrance gate from Lightsey Ranch Road is locked with a finite number of people with access. Public safety crews have access through a master key system.</i>
The extent of a government's obligation or liabilities including, but not limited to, infrastructure improvement, infrastructure maintenance, and public safety;	<i>The access easement receives no County maintenance. Expansion of this use does not obligate the County to maintain any new infrastructure. There is an increase in potential public safety services demand. It doubles the risk by doubling the potential number of cabins or RV ports. However, the current amount is so low that it is not a significant increase overall. Additionally, the current and past use of the site underperforms to its potential.</i>
The potential impact that the expansion may pose to neighboring properties;	<i>Aside from the abutting vacation property, there are no residential structures for miles (see Exhibit 3). Other neighboring properties are not buildable. To the north and west is Lightsey Ranch. The area is comprised of vast amounts of cattle grazing. Most of the lands in this area are under cattle grazing or habitat protection (see Exhibit 7).</i>
The extent of the use's longevity;	<i>This is a low-volume use surrounded by conservation and agricultural lands. The most significant demand on County infrastructure or services will be public safety (Fire Rescue, Ambulance, and Law Enforcement). At 20 campsites, this was not significant. Although double, 40 campsites will not likely be significant. It benefits the County public safety services to have access to Lake Kissimmee available at this location for rescues needed by others on the lake. The access easement will last as long as it is maintained as it has been in the past.</i>
The applicant's future plans for the property	<i>The County has no intention to maintain the unpaved access</i>

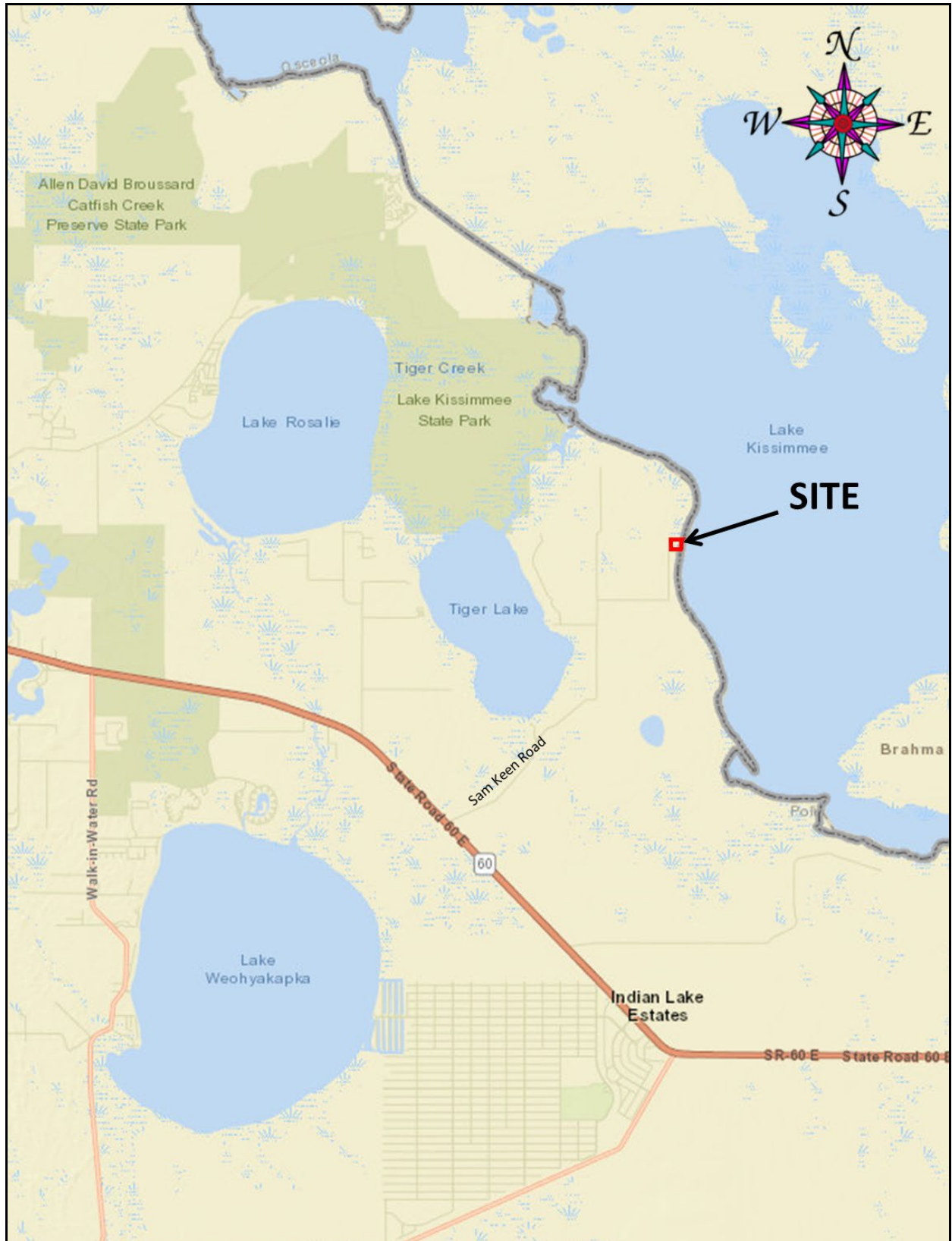
Table 11

The Planning Commission, in the review of Expansion of Non-residential Non-Conforming Use, shall consider the following factors in accordance with Section 120.J.1.c of the LDC:	
relative to the County's plans;	<i>easement. The applicant does not have the ability to grant maintenance authority to the County either. This non-conformity should remain static.</i>
The improved development standards or infrastructure that may result from expansion of the use.	<i>The current condition of the easement is a stabilized compacted surface suitable for emergency vehicles. This approval will not incur any further responsibilities or maintenance requirements of the County.</i>

Comments from other Agencies: Polk County Land Development Engineering and the Polk County Public Safety Division contributed to the drafting of this report.

Exhibits:

- Exhibit – 1 Location Map
- Exhibit – 2 Future Land Use Map
- Exhibit – 3 2024 Satellite Photo (Context)
- Exhibit – 4 2024 Satellite Photo (Close-up) Current Approval
- Exhibit – 5 2024 Satellite Photo (Close-up) Proposed Expansion
- Exhibit – 6 South Side Site Plan
- Exhibit – 7 Conservation Easements and Ownership



Location Map



Future Land Use Map



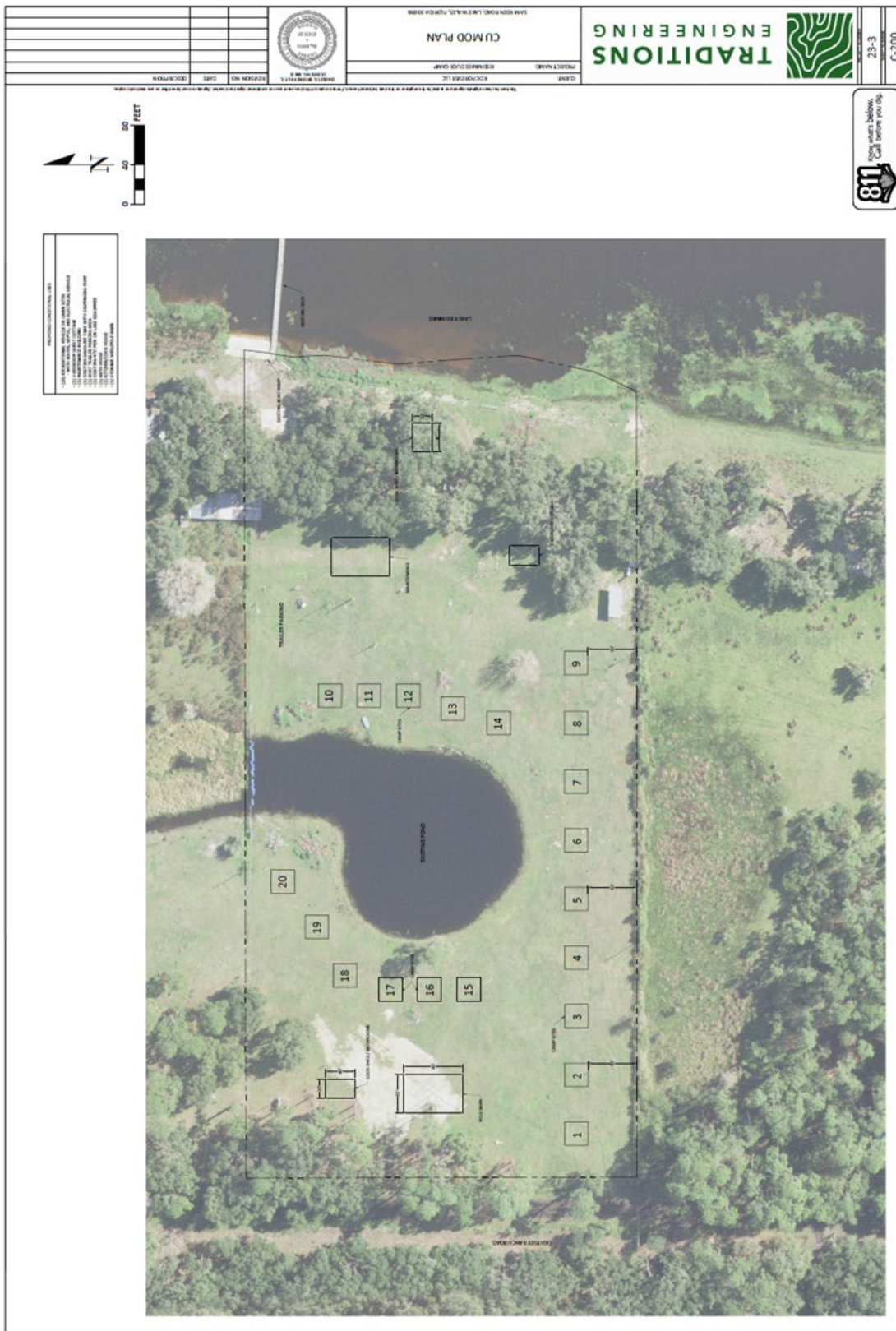
2024 Satellite Photo (Context)



2024 Satellite Photo (Close Up)



2024 Satellite Photo (Close Up)



South Side Site Plan



Conservation Easements and Ownership