

POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

DRC Date:	August 28, 2025	Level of Review:	Level 3 Review
PC Date:	November 5, 2025	Type:	Conditional Use Approval
BoCC Date:	N/A	Case Numbers:	LDCU-2025-20
Applicant:	Kelsey Reynolds	Case Name:	Reynolds CU
		Case Planner:	Andrew Grohowski, Planner II

Request:	The applicant is requesting Conditional Use approval for a Mobile Home to be permitted on ±3.75 acres within a Residential Low-1 Future Land Use District.
Location:	720 Reynolds Road, south of US Highway 92 and County Highway 542, east of Combee Road South, north of Skyview Drive, west of Saddlebag Lane, east of the City of Lakeland in Section 23, Township 28, Range 24.
Property Owners:	Grant Alan Reynolds & Kelsey Alyssa Culm
Parcel Number:	242823-000000-034160 (±3.75 acres)
Future Land Use:	Residential Low-1 (RL-1)
Development Area:	Transit Supportive Development Area (TSDA)
Nearest Municipality:	City of Lakeland
DRC Recommendation:	Approval
Planning Commission Vote:	Pending Hearing

Location Map



2023 Aerial Photo (Context)



Summary of Analysis:

The applicant is requesting Conditional Use approval to locate a Mobile Home in a Residential Low-1 (RL-1) land use district on a ±3.75-acre lot. Chapter 2, Table 2.1 (Use Table for Standard Land Use District) of the Land Development Code (LDC) instructs that the placement of mobile homes in the RL-1 land use district requires Conditional Use approval via a Level 1 Review (via Staff only). To meet current development approval conditions, requests for mobile homes must adhere to the standards found in Chapter 3, Section 303 (*Mobile Home, Individual*) of the LDC.

The property is not located within a platted subdivision. Reynolds Road has a mixture of both detached single-family and mobile homes either on individual lots or in subdivisions. LDC Section 303 allows administrative approval for the placement of a mobile home within un-platted lots if the abutting sides have existing mobile homes or if the subject parcel is greater than five acres. Since these standards cannot be met, the request must be approved by the Planning Commission in terms of the compatibility of individual mobile homes relative to the character of surrounding residential uses.

Staff recommends approval. The mobile home request is compatible with neighboring properties and surrounding area. The nearest mobile home to the subject site is approximately 460 feet to the south (Parcel No. 242823-000000-034150) on about 19-acres. A large mobile home park, Schalamar Creek (PUD # 85-45) is less than 1½ mile to the northeast with 1,214 units. The Village of Lakeland and Anglers Cove West are two mobile home parks established in the 1980s. They are within ¼ mile from the subject site and have 319 and 153 mobile home spaces, respectively. Access is proposed off of Reynolds Road and will utilize a shared driveway easement with the property to the south, which has a 4,541 sq. ft. single-family residence under construction (BR-2025-2590). The Staff finds the placement of a new mobile home on this site does not present any apparent incompatibilities as the mobile home subdivisions in the immediate area have existed for over forty years. This parcel is not anticipated to cause any public safety concerns nor foreseeably place a strain on existing infrastructure, schools, or emergency services. The site will utilize a septic system and private well for potable water and plans to share a driveway easement with the neighboring property to the south. The driveway has received waiver approval from separation requirements on an Urban Collector roadway (LDWA-2025-17). There are no wetlands on site, and the flood zone covers a small portion to the rear of the property. There are no known environmental constraints that will prohibit the development of a mobile home. The proposed request is also consistent with the LDC and Comprehensive Plan.

Findings of Fact

- *LDCU-2025-20 is a Conditional Use request to allow a mobile home on Parcel No. 252806-000000-022280 (±1.23 acres) within a Residential Low-1 (RL-1) Future Land Use District in the Transit Supportive Development Area (TSDA).*
- *The surrounding properties are within a Residential Low-1 (RL-1) land use district and consist of single-family detached residences, mobile homes and vacant land.*
- *The subject site was part of approximately 11.24-acre parent parcel which performed a lot split (former Parcel No. 242823000000034120). The property was sold to Alan Reynolds and Susan B. Reynolds through a Quitclaim Deed on June 12, 2023, according to O.R. Book 12739, Pages 972 and 973.*

- *On January 13, 2025, the site was subsequently subdivided again with the southern 2.19-acre parcel ("Parcel Three") sold to Daniel Paul Burnham and Tiffany Lee Burnham through a Quitclaim Deed, according to O.R. Book 13406, Pages 8 to 13 (Parcel No. 242823000000034170). The subject site ("Parcel Two") was sold to Grant Alan Reynolds and Kelsey Alyssa Culm through a Quitclaim Deed, according to O.R. Book 13406, Pages 2 to 7.*
- *The subject property has approximately 92 feet of frontage along Reynolds Road. Reynolds Road (Road No. 843423) is a County-maintained Urban Collector roadway with a paved surface width of 25 feet, according to the Polk County Road Inventory.*
- *Per Chapter 7, Section 705, Table 7.5 of the LDC, the minimum distance between residential driveway center lines on an Urban Collector roadway is 100 feet.*
- *The adjacent parcel to the south site received approval for a waiver to Section 822 of the LDC for road frontage (LDWA-2025-17). Both the southern parcel and subject site plan to use a shared private easement for access.*
- *The southern property (Parcel No. 242823000000034170) is currently constructing a 4,541 square foot single-family residence (BR-2025-2590).*
- *POLICY 2.109-A24 of the Comprehensive Plan states that "The purpose of the Residential Low (RL) land use district is to provide areas for the low density residential development in the urban areas of unincorporated Polk County."*
- *Per Chapter 2, Section 205, Table 2.2 of the LDC, the RL-1 land use district mandates right-of-way setbacks from Urban Collector roadways for the primary structure of 35 feet, side setbacks for the primary structure of 10 feet; and rear setbacks for the primary structure of 15 feet.*
- *POLICY 2.203-A2 of the Comprehensive Plan (Housing Element) states that "Mobile homes shall be allowed in all areas of the County designated for residential development, subject to siting and design criteria consistent with the County's Land Development Code."*
- *Chapter 2, Table 2.1 of the LDC, indicates Individual Mobile Homes within the RL-1 district are conditionally permitted following a Level 1 Review.*
- *Per Chapter 3, Section 303 of the LDC, Individual Mobile Homes are allowed in all of the following locations:*
 - 1. Within any registered mobile home park that has been approved by Polk County;*
 - 2. Within any platted residential subdivision that has been approved by Polk County as a mobile home subdivision;*
 - 3. Within any platted residential subdivision or single platted phase within a multiple phased development recorded prior to May 20, 1971;*

4. *Within any platted residential subdivision, or single platted phase within a multiple phased development recorded after May 20, 1971, in which 50 percent or more of the developed lots contain mobile homes;*
 5. *On any un-platted legal residential lot or parcel in the A/RR district;*
 6. *On any un-platted legal residential lot or parcel that is five acres or larger in the RS district;*
 7. *On any un-platted legal residential lot or parcel that is abutting vacant properties to all side and rear property lines;*
 8. *On any un-platted legal residential lot or parcel where at least one property abutting the subject property's side lot line has a mobile home;*
 9. *On lots of record, including those within platted subdivisions, where at least one property abutting the subject property's side lot line has a mobile home. Within subdivisions, the abutting property must be within the plat; or,*
 10. *On any legal residential lot or parcel where it is determined by the Planning Commission to be compatible with the established character of the surrounding area.*
- *Since there are no mobile homes abutting side and rear property lines nor vacant properties on all side and rear lines, the Planning Commission shall determine if the proposed request is compatible with the established character of the surrounding area via the Level 3 Review process.*
 - *Fire and EMS Response is from Polk County Fire Rescue Station 39 located at 3325 E Main Street in Lakeland. This is located approximately 3.6 miles from the subject site with a response time of eleven (11) minutes.*
 - *Sheriff's response to the site is served by the Southwest (SW) District located at 4120 US 98 South in Lakeland. The response times for SW in October 2025 were: Priority 1 Calls – 9:21 and Priority 2 Calls – 25:28.*
 - *The subject property is located within the City of Lakeland's water service area. The lot will utilize its own private well and septic tank.*
 - *The development is zoned for Clarence Boswell Elementary, Crystal Lake Middle School and Tenoroc Senior High School. The site is 4.9 miles from Clarence Boswell Elementary, 2.1 miles from Crystal Lake Middle School, and 4.3 miles from Tenoroc Senior High School.*
 - *The subject parcel is not located within one of the County's Wellhead-Protection Areas.*
 - *The property is composed of 58.9 percent Zolfo fine sand, 31.6 percent Pomona fine sand, and 9.5 percent Placid and Myakka fine sands.*

- *The property has approximately 0.30 acres (10 percent) of floodplains and does not contain Freshwater Emergent wetlands.*
- *According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within a one-mile radius of endangered species. A monitored bald eagle nest (ID # PO269) is located about 0.2 miles southeast of the subject site according to the Audubon EagleWatch Inventory of 2025.*
- *According to the Florida Ecological Greenways Network (FEGN) the site is within a prioritized wildlife greenway network of “Priority Level 3.” According to the Florida Natural Areas Inventory (FNAI), the site not located within an existing or proposed conservation easement.*
- *According to a preliminary report from the Secretary of State’s Department of Historical Resources Florida Master Site File, no archaeological sites are found within the parcel boundaries.*
- *There are two Citrus Connection transit routes within a one-mile radius of the subject property. The Purple Line (Stop # 714) is about 0.55 miles to the north. The Green Line (Stop # 726) is about 0.65 miles to the south.*
- *The subject site has ingress and egress access through Reynolds Road, a paved, Urban Collector roadway. The roadway is tracked for concurrency with Polk County’s Transportation Planning Organization. According to the 2025 Roadway Network Database, Reynolds Road (4139N) has approximately 411 available PM Peak Hour trips; Reynolds Road (4139S) has approximately 395 available PM Peak Hour trips. Reynolds Road current Level-of-Service (LOS) is “C” with an adopted LOS standard of “D”.*
- *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.”*
- *Chapter 553 of the Florida Statutes states that “Mobile Homes” means any residential unit constructed to standards promulgated by the United States Department of Housing and Urban Development. Mobile homes are built to a separate standard than site-built homes and may be regulated differently than site-built and other manufactured homes. Site-built homes and other manufactured homes are built to the standards set forth in Chapter 553 of Florida Statutes.*
- *This request has been reviewed for consistency with Section 303 of the LDC.*
- *This request has been reviewed for consistency with Section 2.102 GROWTH MANAGEMENT; SECTION 2.104 TRANSIT SUPPORTIVE DEVELOPMENT AREA (TSDA) and POLICY 2.203-A2 HOUSING ELEMENT of the Comprehensive Plan.*

Development Review Committee Recommendation: Based on the information provided by the applicant, the findings of fact, 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 **LDCU-2025-20**.

CONDITIONS OF APPROVAL

Based upon the findings of fact, the Development Review Committee recommends **APPROVAL** of LDCU-2025-4 with the following Conditions:

1. LDCU-2025-20 is approved for no more than one (1) mobile home on Parcel # 242823-000000-034160, as indicated in the site plan and staff report.

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

Northwest: RL-1 Vacant, forested land ± 18.13 acres	North: RL-1 710 Reynolds Rd 2,926 sq. ft. single-family home ± 5.30 acres	Northeast: RL-1 710 Reynolds Rd 2,926 sq. ft. single-family home ± 5.30 acres
West: RL-1 Vacant, forested land ± 18.13 acres	Subject Property: RL-1 Vacant land ± 3.75 acres	East: RL-1 & RS 710 Reynolds Rd, wetlands & vacant land ± 40.18 acres
Southwest: RL-1 740 Reynolds Rd 1,120 sq. ft. single-family home ± 0.52 acres	South: RL-1 730 Reynolds Rd Proposed 4,541 sq. ft. single-family home ± 2.20 acres	Southeast: RL-1 & RS 710 Reynolds Rd, wetlands, & vacant land ± 5.30 acres

Source: Polk County Geographical Information System and site visit by County staff

The property, as well as adjacent lots, are unplatted and within a Residential Low-1 (RL-1) land use district consisting of single-family site-built homes. The general area is occupied with a combination of a site-built single-family homes, mobile homes, and vacant residential. The property directly to the south is currently constructing a 4,541 sq. ft. single-family residence (BR-2025-2590). A large tract of vacant land within the Residential Suburban (RS) land use district is to the rear. Two mobile home parks, The Village of Lakeland and Angler's Cove West to the south (LIC-H-1426), both have more than 150 mobile home spaces and were developed in the 1970s and 1980s.

Compatibility with the Surrounding Land Uses and Infrastructure:

This request is compatible with surrounding land uses and available infrastructure. The impact from a single mobile home is minimal. Given the improved standards for mobile home construction in recent years, the placement of a mobile home in this location is compatible with surrounding homes.

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.”

The property is not located within a platted subdivision. Individual properties and subdivisions line Reynolds Road and consist of a mixture of detached single-family and mobile homes. Existing mobile homes are commonly found within the surrounding area since the 1980s, according to historical aerials. The nearest mobile home to the subject site is approximately 460 feet to the south (Parcel No. 242823-000000-034150) on about 19-acres. Two subdivisions under ¼ mile to the north and south from the site, The Village of Lakeland and Angler's Cove West, have 319 and 153 mobile home spaces respectively (*Exhibit 5*). Further south, Sunshine Village MHP has 303 mobile home spaces. However, the largest mobile home park nearby is Schalamar Creek, which is less than 1½ mile northeast. The Planned Unit Development was approved in 1985 for a 1,214 unit mobile home park, a 155 unit destination recreational vehicle park, and golf course (PUD # 85-45). If a mobile home were to have been developed in any of these subdivisions, or if the neighborhood was part of a plat prior to May 20, 1971, additional approval via the Planning Commission would not be necessary.

Urban Services and Infrastructure Analysis

The surrounding area has public safety service facilities that are operating within their adopted Level-of-Service (LOS) standard with no deficiencies. Placement of one mobile home will not trigger school concurrency requirements at Clarence Boswell Elemenatry, Crystal Lake Middle School, or Tenorac Senior High School; however, Clarence Boswell Elementary is at 87% capacity, Crystal Lake Middle is operating at 57% capacity, and Tenorac Senior High School is currently operating at 62% capacity. The subject property is located within the City of Lakeland's water service area.

Table 2, to follow, summarizes urban services and infrastructure for the surrounding area. Based upon the nature and size of the request, this proposal is not anticipated to create any significant demand on these services.

Table 2

Urban Services and Infrastructure Summary	
Schools (Zoned)	Clarence Boswell Elementary; 2024-2025 School Capacity: 87% Crystal Lake Middle School; 2024-2025 School Capacity: 57%

Urban Services and Infrastructure Summary	
	Tenoroc Senior High School; 2024-2025 School Capacity: 62% (Source: Polk County School Board)
Sheriff	Sheriff's response to the site is served by the Southwest (SW) District Substation located at 4120 US 98 South, Lakeland. The response times for SW in October 2025 were: Priority 1 Calls – 9:21 and Priority 2 Calls – 25:28.
Fire/EMS	Fire and EMS Response is from Polk County Fire Rescue Station 39 located at 3325 E Main Street, Lakeland. This is located approximately 0.9 miles from the subject site with a response time of 4-5 minutes. No objections.
Water	Private Well
Sewer	Onsite Treatment System
Transportation	The subject site has ingress and egress access through Reynolds Road, a paved, County-maintained Urban Collector roadway (Road No. 843423). According to the 2025 Roadway Network Database, the nearest monitored roadway link Reynolds Road (4139N) has approximately 411 available PM Peak Hour trips; Reynolds Road (4139S) has approximately 395 available PM Peak Hour trips. Reynolds Road current Level-of-Service (LOS) is "C" with an adopted LOS standard of "D". There are two Citrus Connection lines within one-mile to the north (Purple Line; Stop # 714) and south (Green Line; Stop # 726) of the subject site.
Urban Sprawl	Site is located within the TSDA and is not considered urban sprawl.

Table 3, below, identifies the anticipated impact of one mobile home on water and sewer services. The site has approximately 92 feet of frontage along Reynolds Road, using a private well and septic tank. The placement of one mobile home will have negligible impacts on the traffic on local roadways.

Table 3

Impact Analysis Summary Proposed Conditional Use (One Mobile Home)			
Potable Water Impact	Wastewater Impact	*AADT Impact	*PHT Impact
360 GPD (on-site well)	270 GPD (on-site septic)	7.81 AADT	1.00 PHT
Source: Polk County Concurrency Manual. The proposed development assumes that the potable water rate for a mobile home will consume 360 GPD and generate 270 GPD in wastewater. ITE 210-Single Family rate was used to determine similar AADT and PM Peak Hour rates for mobile homes. The AADT rate was 7.81 and the PM Peak Hour rates was 1.00 per unit.			

Environmental Conditions Analysis

There are no further known conditions that should pose a threat to the existing environmental resources based upon the proposed request (Table 4). The parcel is approximately 3.75 acres total and is comprised of 0.33, or 10%, within the 100-year flood zone. The Saddle Creek River is about ¾ mile to the east of the subject property. The remaining lands are considered uplands to the western portion of the property. No freshwater emergent wetlands were identified on the site. Per Chapter 6, Section 620 – Wetland Protection of the Land Development Code (LDC), an undisturbed vegetative buffer adjacent to surface waters with an average width of 25 feet and a minimum width of 15 feet shall be maintained for stormwater treatment and wildlife utilization measured perpendicularly from the OHWL or the jurisdictional wetland line, whichever is greater.

It is easy to meet the 25 feet wetland buffer and the development setbacks in Chapter 2 of the LDC as the parcel spans over 1,000 feet in length.

The subject site is not located within any of the County's identified Wellhead-Protection Areas, Historical Preservation Area, or In-Flight Visual Interference Zone. The subject property is not located within a one-mile radius of endangered species, according to the Florida Natural Areas Inventory Biodiversity Matrix. The subject property contains no surface water features and gradually slopes downward to the east with an elevation of 130' along Reynolds Road to 112' to the rear, or easternmost portion of the site.

Table 4

Environmental Conditions Summary	
Surface Water	None
Wetlands/Floodplains	The site is entirely composed of uplands with no freshwater emergent wetlands. About 0.30 acres of the site is within a special flood hazard area (Zone A), according to FEMA maps.
Soils	The property is composed of 58.9 percent Zolfo fine sand, 31.6 percent Pomona fine sand, and 9.5 percent Placid and Myakka fine sands, which provides poor drainage, but the soil is not of such that would limit compliance with applicable LDC regulations for the proposed use.
Protected Species	The subject site is not located within one mile of any identified endangered species. One monitored bald eagle nest (ID # PO269) is located about 0.2 miles southeast. (Sources: Florida Natural Areas Inventory Biodiversity Matrix & Audubon EagleWatch Inventory of 2025).
Wellfield Protection	The property is not located within any County Wellhead-Protection Areas.
Historical Preservation	The subject property contains no historical resources as monitored by the State of Florida's Division of Historical Resources.
Airports	The subject property is located outside any Airport's Height Notification and In-Flight Visual Interference Zones.

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 5 in accordance with Section 906.D.7 of the Land Development Code.

Table 5

The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:	
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 which permits this use upon completion of a Level 3 Review. These can be found in the Findings of Fact on Pages 2-5 of 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, as reviewed for consistency with SECTION 2.102 GROWTH MANAGEMENT and POLICY 2.203-A2 HOUSING ELEMENT of the Comprehensive Plan.</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. See Pages 6-7 of this staff report for data and analysis on surrounding uses and compatibility.</i>
How the concurrency requirements will be met if the development were built.	<i>This request will not require concurrency determination from utilities, the School Board, or TPO. The impact on public services can be found in the analysis found on Pages 7-8 of the staff report.</i>

Comments from other Agencies: None

Exhibits:

Exhibit 1 – Location Map

Exhibit 2 – Future Land Use Map

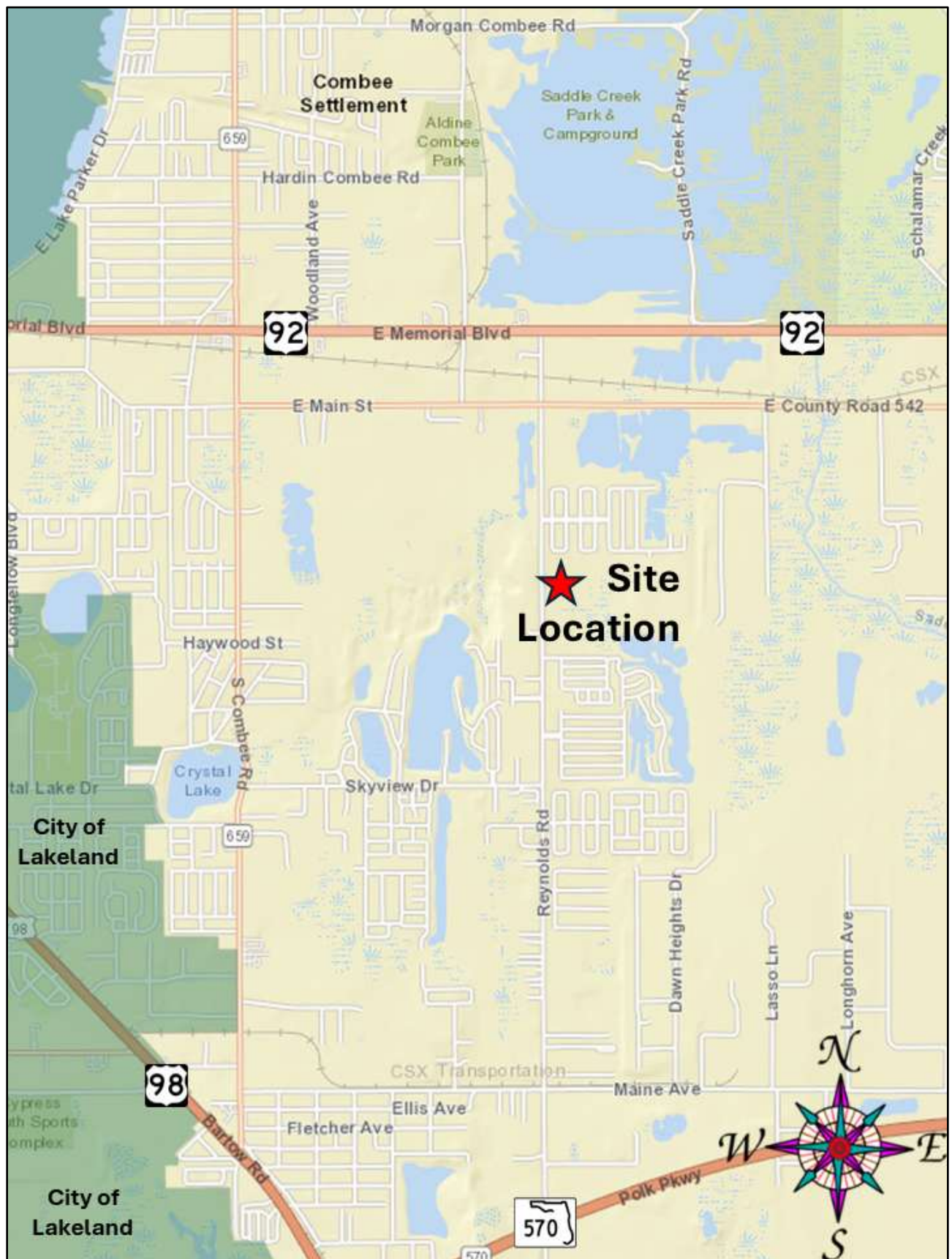
Exhibit 3 – 2023 Aerial Image (Context)

Exhibit 4 – 2025 Satellite Photo (Close-up)

Exhibit 5 – Surrounding Properties

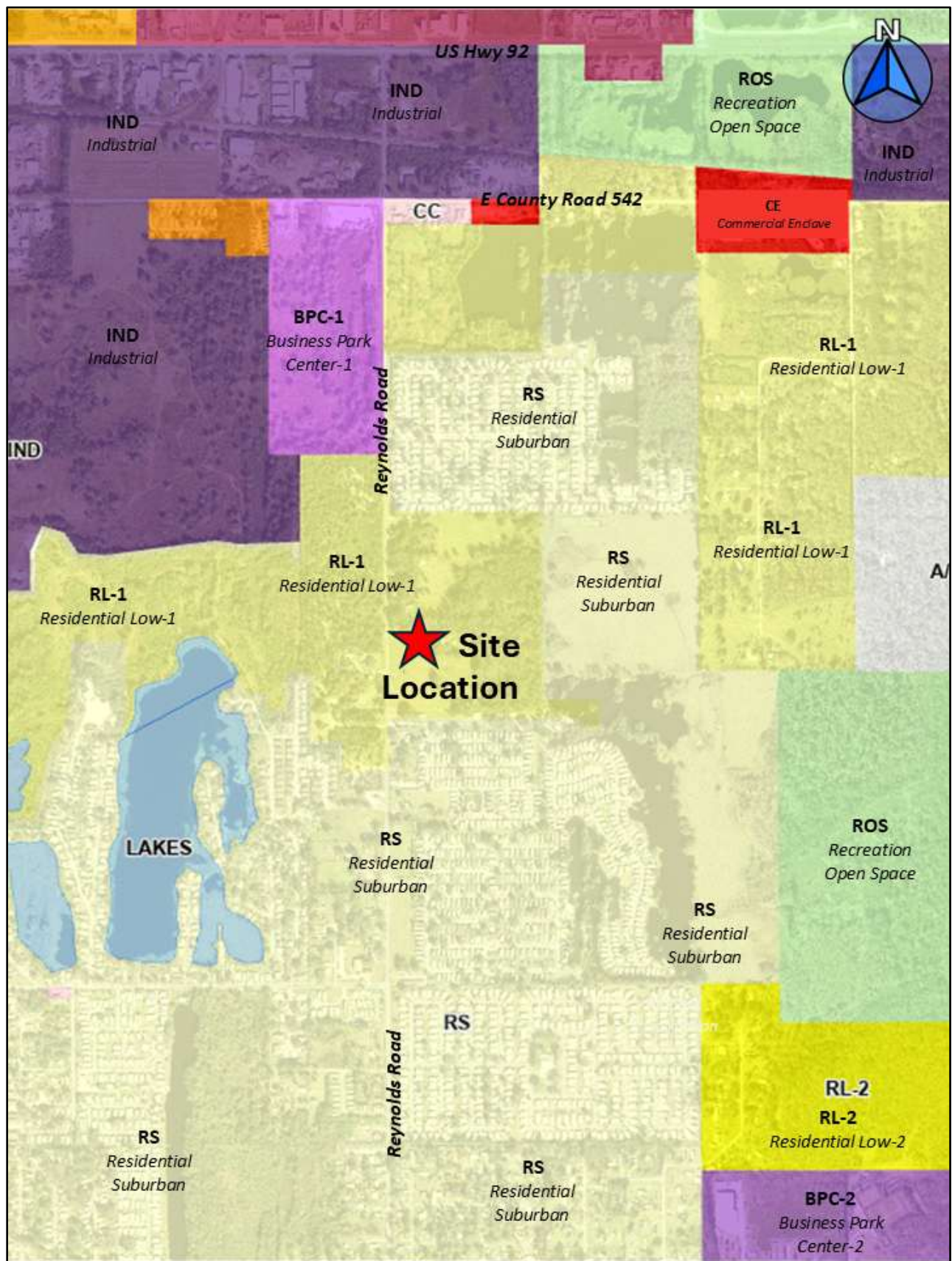
Exhibit 6 – Site Plan

Exhibit 1



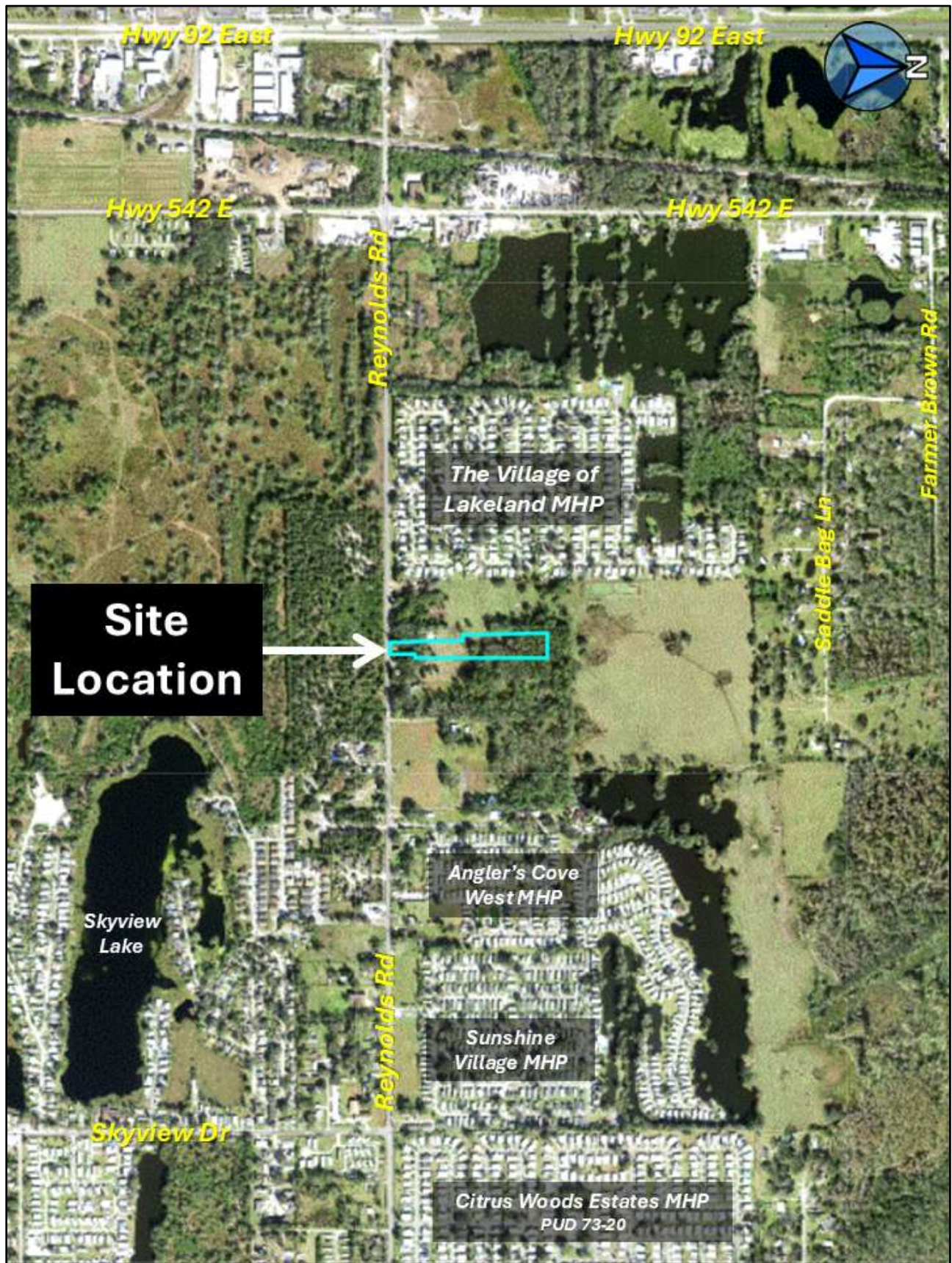
Location Map

Exhibit 2

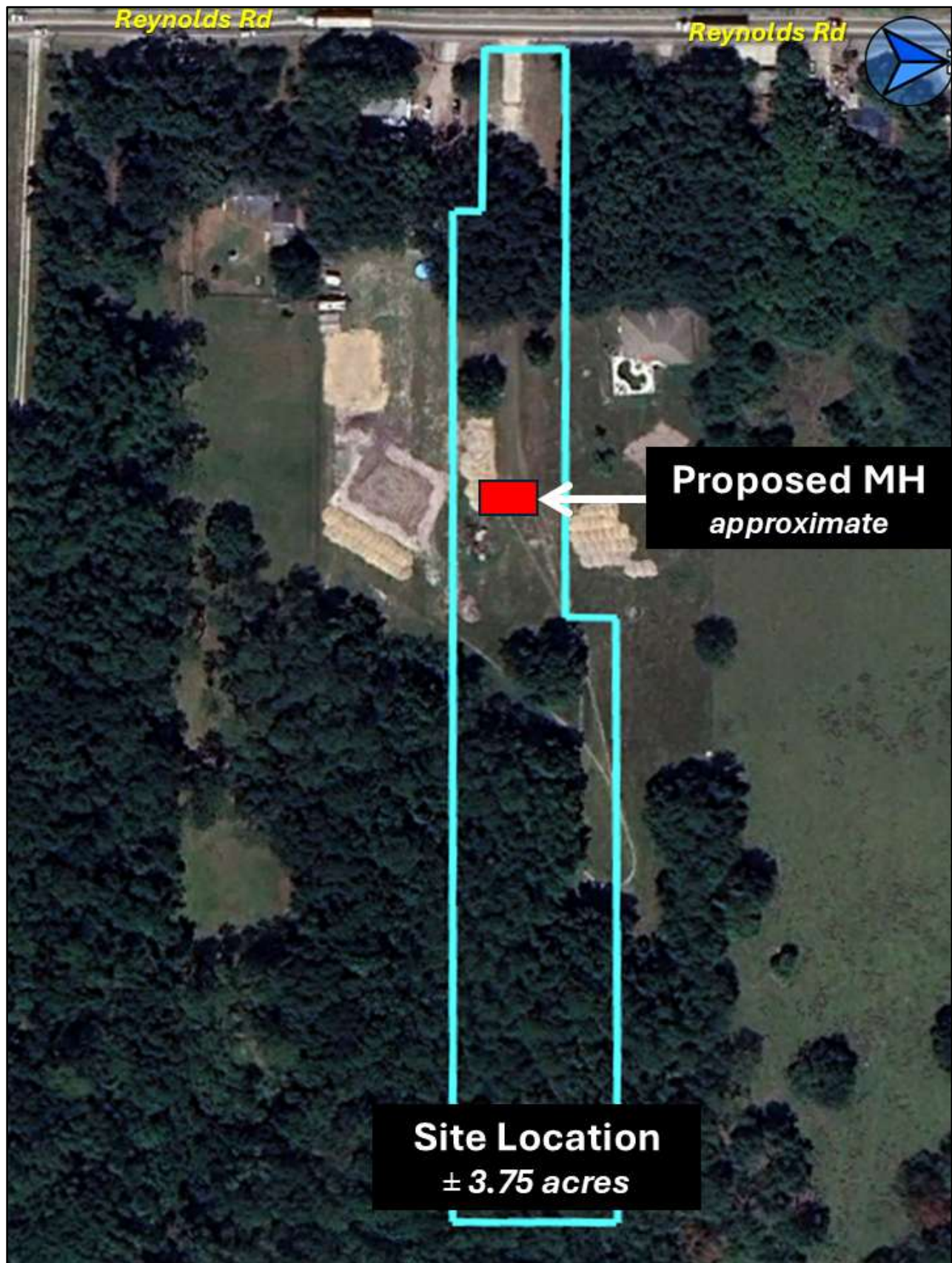


Future Land Use Map

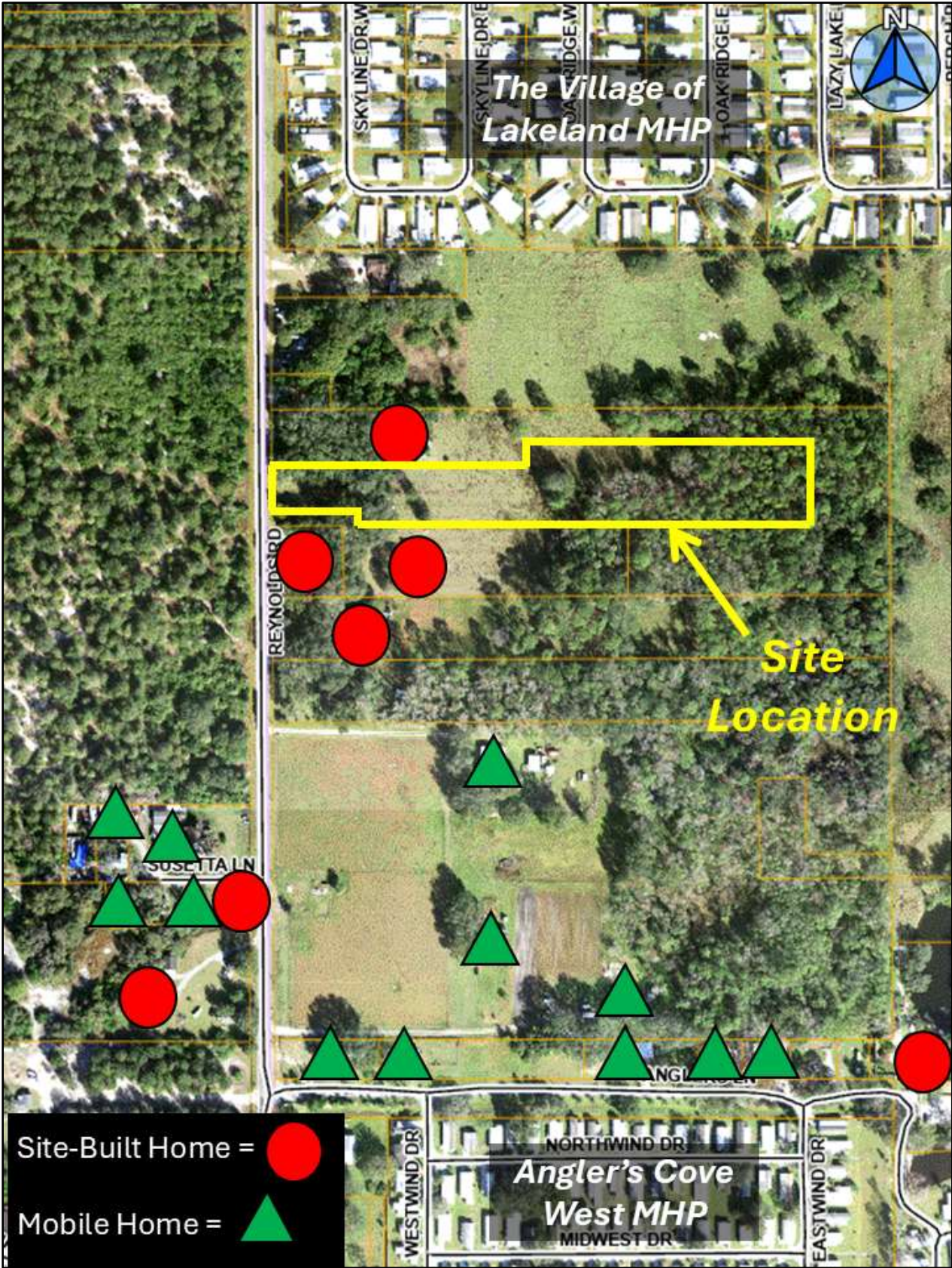
Exhibit 3



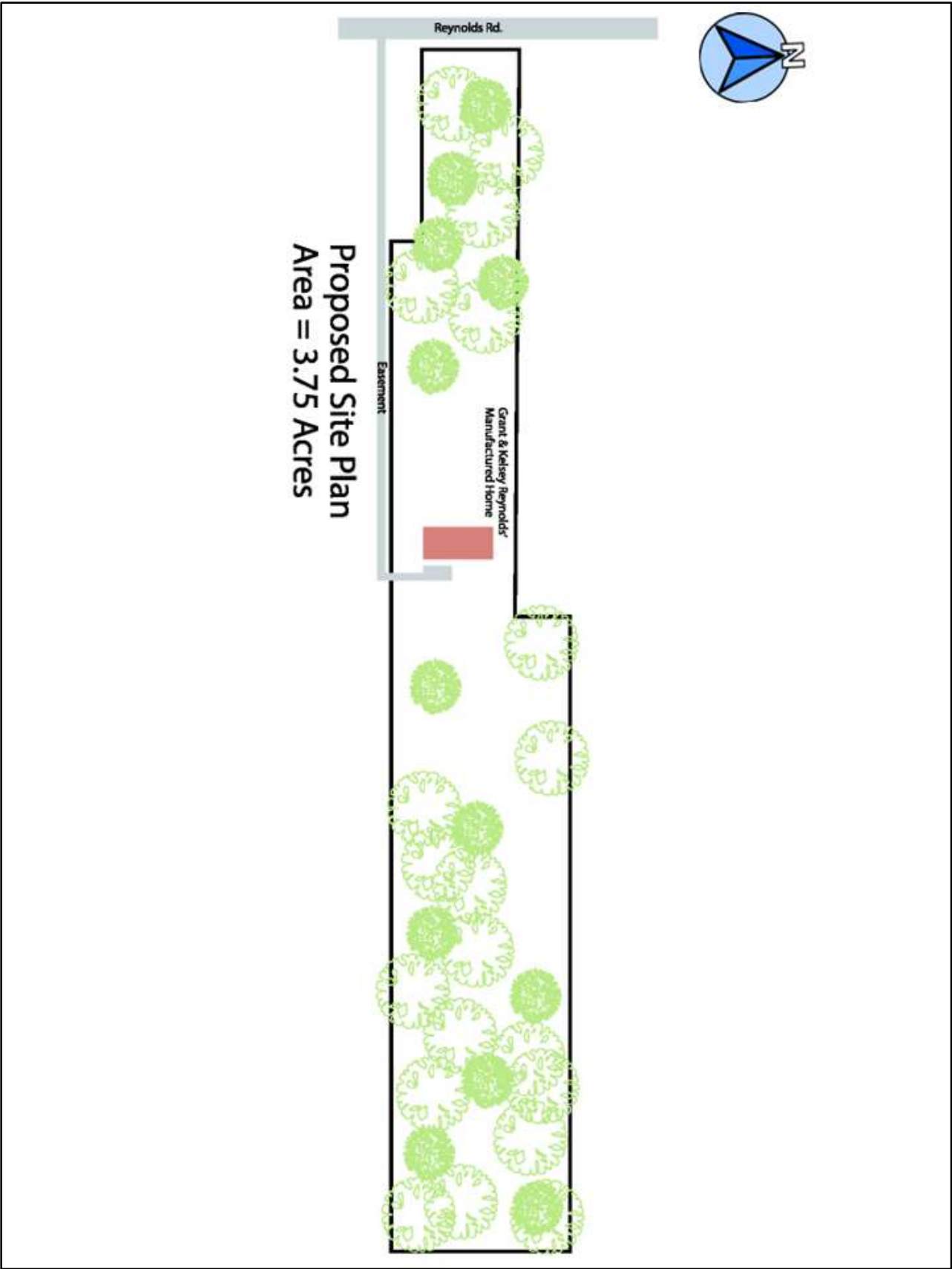
2023 Aerial Image (Context)



2025 Satellite Photo (Close-up)



Surrounding Properties



Site Plan