

Yannone, Lyndsay

From: Eric Swanson <eric@swancapitalpartners.com>
Sent: Friday, May 29, 2026 9:25 AM
To: Yannone, Lyndsay
Cc: Ziskal, Benjamin; Nance, Ivan; Jesse Anderson; Robert Gidel, Jr
Subject: Kathleen Reserve RRD [Case No. LDPD-202606] – Pre-Hearing Supplemental Submittal Materials for Wednesday, June 3rd, 2026
Attachments: 1 PC Memo - Kathleen Reserve RRD - LDPD-2026-6 - 06.2026.pdf; 1 PC Memo - Kathleen Reserve RRD - LDPD-2026-6 - 06.2026.pdf; 2 PC Supplemental - Kathleen Reserve RRD - LDPD-2026-6 - 06.2026.pdf; 3 Executive Submittal - Kathleen Reserve RRD - LDPD-2026-6 - 06.2026.pdf; 4 SwanCP Responses - Kathleen Reserve RRD - LDPD-2026-6 - 06.2026.pdf

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Good morning Lyndsay,

Attached are several supplemental materials for Kathleen Reserve / Deeson Road RRD (LDPD-2026-6) that I would like included in the public record prior to the upcoming Planning Commission hearing.

These materials are intended to supplement the original application package, provide additional planning and compatibility analysis, address a number of technical and public concerns raised throughout the review process, and provide additional context regarding the project, surrounding development patterns, infrastructure, and proposed development conditions.

The supplemental materials include the following:

- 1. Kathleen Reserve RRD – Planning Commission Memorandum**
A memorandum summarizing the evolution of the project, compatibility considerations, environmental preservation approach, stormwater strategy, Comprehensive Plan consistency, surrounding development pattern analysis, and overall public benefit framework associated with the proposed RRD.
- 2. Kathleen Reserve RRD – Supplemental Planning & Development Pattern Analysis**
A contextual planning analysis containing supporting exhibits, surrounding development pattern evaluations, historical entitlement references, infrastructure and public investment context, adjacent density evaluations, compatibility transition analysis, and comparable development examples within the Kathleen area and SDA corridor.
- 3. Executive Pre-Hearing Submittal**
An executive summary outlining the procedural and conditional approval framework associated with the RRD request, including discussion of enforceable development conditions, transportation review, stormwater permitting, concurrency, utilities, environmental review, and final engineering requirements.
- 4. Swan Capital's Responses to Staff / Public / Agency Report Comments**
A formal response-to-comments matrix prepared to address common staff, agency, and public concern categories typically associated with rural residential development applications, including compatibility,

density, traffic, stormwater, utilities, environmental resources, neighborhood transitions, agricultural interfaces, and enforceable development conditions.

Collectively, these materials further document the project's low-density development pattern, compatibility measures, preservation strategy, clustered design approach, infrastructure considerations, and overall consistency with the Rural Residential Development (RRD) framework and Comprehensive Plan.

I respectfully request that these materials be incorporated into the public record for Case LDPD-2026-6 and included as part of the hearing materials associated with this application. Please let me know if there are any issues opening the files or if anything further is needed prior to the hearing.

Thank you,

Eric K. Swanson
Swan Capital Partners
Cell: 813-462-8682

TO: Polk County's Planning Commission

FROM: Eric Swanson, Swan Capital Partners

RE: Kathleen Reserve Rural Residential Development (RRD)
Planning Commission Supplemental Material
Polk County, FL

DATE: Wednesday, June 3rd, 2026

MEMORANDUM

This memo supplements the Kathleen Reserve RRD application and provides additional context on the evolution of the project, compatibility considerations, environmental preservation, stormwater management, and consistency with the Polk County Comprehensive Plan and RRD framework.

Kathleen Reserve consists of approximately 153 acres located within the Suburban Development Area (SDA) in northwest Polk (Kathleen area) along Deeson Road. The project utilizes the RRD framework to cluster residential development on upland portions of the property while preserving substantial wetland, floodplain, open space, and agricultural areas.

Key Components of Kathleen Reserve:

- Reduced development intensity and enhanced perimeter transitions;
- Significant preservation of wetlands, floodplain, pasture, and open space areas;
- Centralized utility connections and managed stormwater design;
- Clustered development intended to minimize impacts on environmentally sensitive areas;
- Consistency with Polk County's RRD policies.

EVOLUTION OF THE DEVELOPMENT PLAN

Kathleen Reserve is the product of multiple years of planning, engineering analysis, environmental evaluation, and coordination efforts.

Throughout the evolution of the project, responsiveness to the prior SPD (2023) de novo denial findings influenced development intensity, buffering, preservation areas, compatibility measures, and overall site design. The resulting plan reflects a deliberate balance between private property rights, environmental stewardship, compatibility, and sound planning principles.

COMPATIBILITY & DEVELOPMENT PATTERN ANALYSIS

The surrounding area contains a mixture of existing residential subdivisions, single- and multi-family residential parcels, legacy lot patterns, agricultural/aquacultural uses, and environmentally constrained lands.

Importantly, the area has experienced substantial residential growth over time, including multiple approved and developed clustered residential projects within the SDA. The proposed Kathleen Reserve RRD reflects a lower overall density and development intensity than the approved Planned Developments (PDs) and Suburban Planned Developments (SPDs) within the immediate surrounding area, while also incorporating enhanced perimeter transitions and preservation-oriented design features.

In evaluating compatibility and establishing the perimeter lot transition strategy, the applicant utilized methodologies consistent with Polk County's Residential Infill Development (RID) policies to analyze surrounding development patterns, including an evaluation of density averages of adjacent parcels, lot and unit configurations, and general development characteristics within the immediate area. This evaluation assisted in establishing transitional perimeter lot dimensions and a project density framework intended to better integrate the proposed development with the surrounding neighborhood fabric while reducing visual- and intensity-related impacts along project edges.

As part of prior entitlement and compatibility evaluations within Polk County, the applicant also considered the County's former "density, significantly different" compatibility tool previously referenced within Chapter 10 definitions and related planning interpretations. This compatibility methodology was intended to assist evaluations regarding proportionality, transitional compatibility, and the avoidance of materially disproportionate density relationships within developing areas.

Based upon those surrounding development patterns and historical compatibility methodologies utilized within Polk County, the proposed RRD density was intentionally calibrated to remain substantially aligned with the broader surrounding development context and below density levels that could reasonably be characterized as significantly different from surrounding residential patterns.

Compatibility Measures of Kathleen Reserve:

- Half-acre perimeter lots adjacent to existing residential areas;
- Landscape buffering;
- Preservation/open space/stormwater separation areas;
- Clustering of development away from sensitive boundaries;
- Reduced visual intensity along perimeter areas and public roads; and
- Internalization of density toward the center of the project.

ENVIRONMENTAL PRESERVATION AND STORMWATER CONSIDERATIONS

Kathleen Reserve contains significant wetlands, floodplain, and environmentally constrained areas associated with the Kathleen Drainage Basin/North Blackwater Creek system. The proposed RRD intentionally clusters development on upland portions of the property to minimize impacts to sensitive environmental areas; preserve substantial open space; reduce development encroachment into constrained areas; and maximize opportunities for stormwater management, flood attenuation, and water quality.

Kathleen Reserve reflects an understanding of the basin-specific flooding sensitivities that exist within this portion of the Kathleen Drainage Basin. The applicant's intent is not merely to satisfy minimum compliance standards with Polk County and SWFWMD, but to implement a managed and engineered stormwater system that responsibly addresses onsite and downstream conditions through coordinated attenuation, water quality treatment, floodplain compensation, and preservation-oriented stormwater strategies designed to responsibly manage discharge rates and downstream conditions.

Substantial portions of the property (approximately 93.28 Acres, or roughly 61% of the site) will remain undeveloped as wetlands, floodplain, agricultural/open space, and stormwater-related areas.

CONSISTENCY WITH POLK COUNTY'S COMPREHENSIVE PLAN AND RRD FRAMEWORK

Kathleen Reserve is consistent with the goals, objectives, and policies of the Polk County Comprehensive Plan and the intent of the County's Rural Residential Development (RRD) framework.

The RRD framework specifically encourages clustered residential design, preservation of open space, efficient infrastructure utilization, environmental protection, and compatibility-sensitive development patterns.

The proposed plan advances these objectives by concentrating development on upland areas; preserving substantial portions of the site; utilizing centralized utilities; minimizing impacts to wetlands and floodplain areas; and incorporating compatibility measures responsive to surrounding development patterns.

The proposal also aligns with broader Comprehensive Plan policies related to compact and contiguous growth; infrastructure efficiency; environmental stewardship; and compatibility mitigation through buffering and transitional design techniques.

The submitted RRD scoring analysis further demonstrates that the project achieves a high level of consistency with the intent and scoring structure established under the County's RRD policies.

PUBLIC BENEFIT CONSIDERATIONS

Kathleen Reserve provides several public and planning-related benefits, including preservation of wetlands and floodplain areas, centralized utility connections, managed stormwater infrastructure, reduced development footprint through clustering, and preservation-oriented site planning within the SDA.

The environmental and hydrological significance of the property and surrounding basin has been recognized through prior public-sector and environmental discussions regarding long-term preservation, flood attenuation, and regional watershed considerations.

CONCLUSION

The Kathleen Reserve RRD reflects a refined and compatibility-sensitive development plan shaped through extensive planning, engineering, and environmental evaluation efforts. The proposed binding development plan incorporates reduced development intensity, enhanced buffering and perimeter transitions, substantial preservation areas, and a managed stormwater approach responsive to the Kathleen Drainage Basin and surrounding development context.

The applicant respectfully submits that the proposed Kathleen Reserve RRD is compatible with the surrounding development context and consistent with the Polk County Comprehensive Plan, Land Development Code, and the intent of the County's RRD framework.

Respectfully submitted,



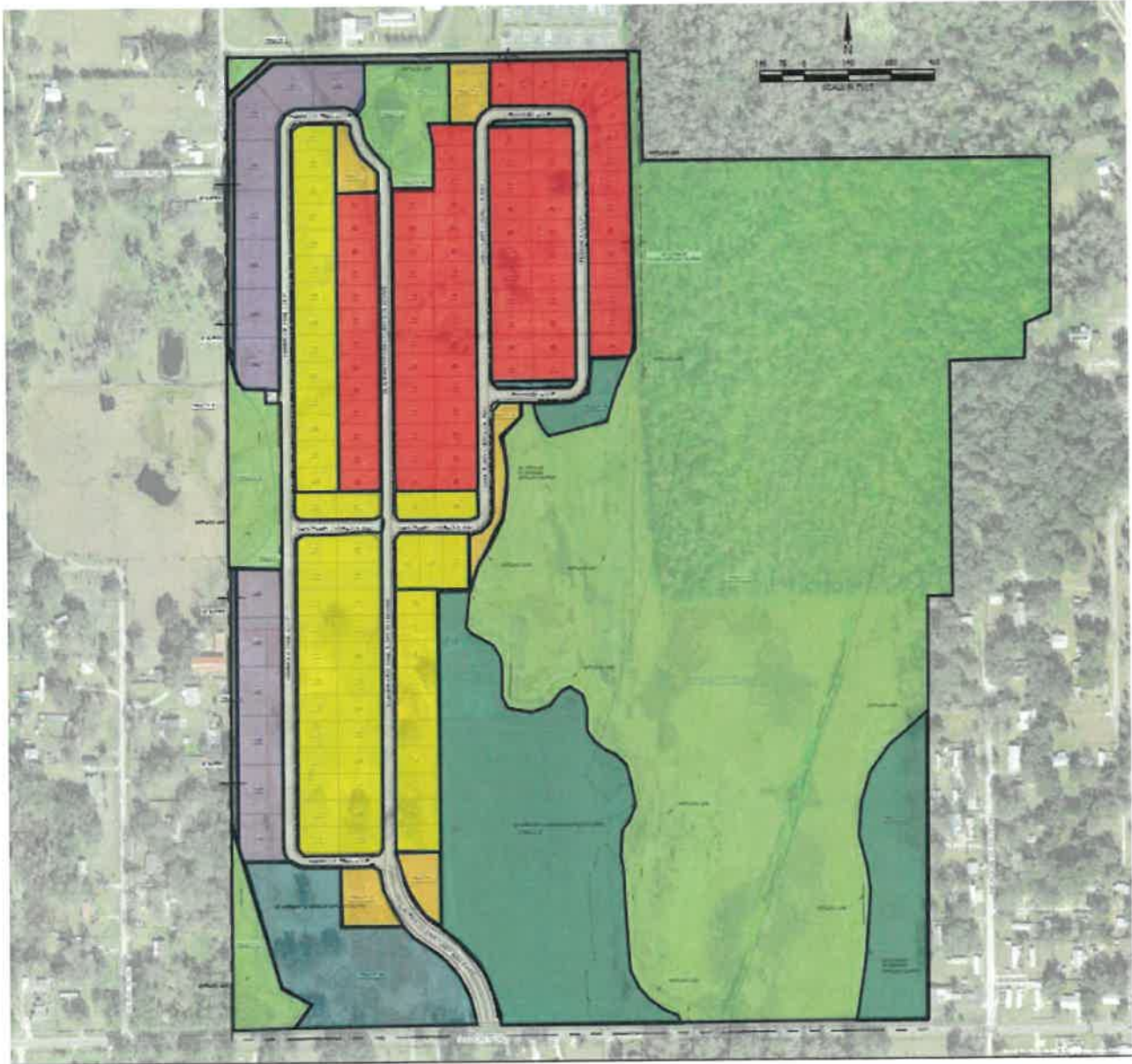
Eric K. Swanson, Principal
Swan Capital Partners
1600 East 8th Avenue, Suite A200
Tampa, FL 33605

Note: In addition to the exhibits provided, the applicant has prepared a separate Supplemental Planning & Development Pattern Analysis document containing supporting contextual materials, surrounding development pattern evaluations, infrastructure context exhibits, and historical entitlement references relevant to the Kathleen Reserve RRD application and broader SDA planning framework.

- Exhibit 1 – Binding Development Plan (BDP)
- Exhibit 2 – Lot & Use Type Colorization (Full Site & Quadrants)
- Exhibit 3 – Kathleen Reserve RRD Open Space Inventory
- Exhibit 4 – Kathleen Reserve RRD Score Sheet Narrative

**EXHIBIT 2
LOT & USE TYPE COLORIZATION (FULL SITE)**

GRADUATED DENSITY • SOFT EDGES • INTERNALIZED INTENSITY



COLOR CODE:

- Purple = Largest Perimeter Transition Lots - 0.50 Acre
- Yellow = Intermediate Transition Lots - 0.25 Acre
- Red = Interior Clustered Lots (Minimum RRD Lot Size) - 0.215 Acre
- Green/Blue = Open Space, Wetlands, Floodplain, Preservation/Stormwater Tracts
- Orange = Amenity Tracts

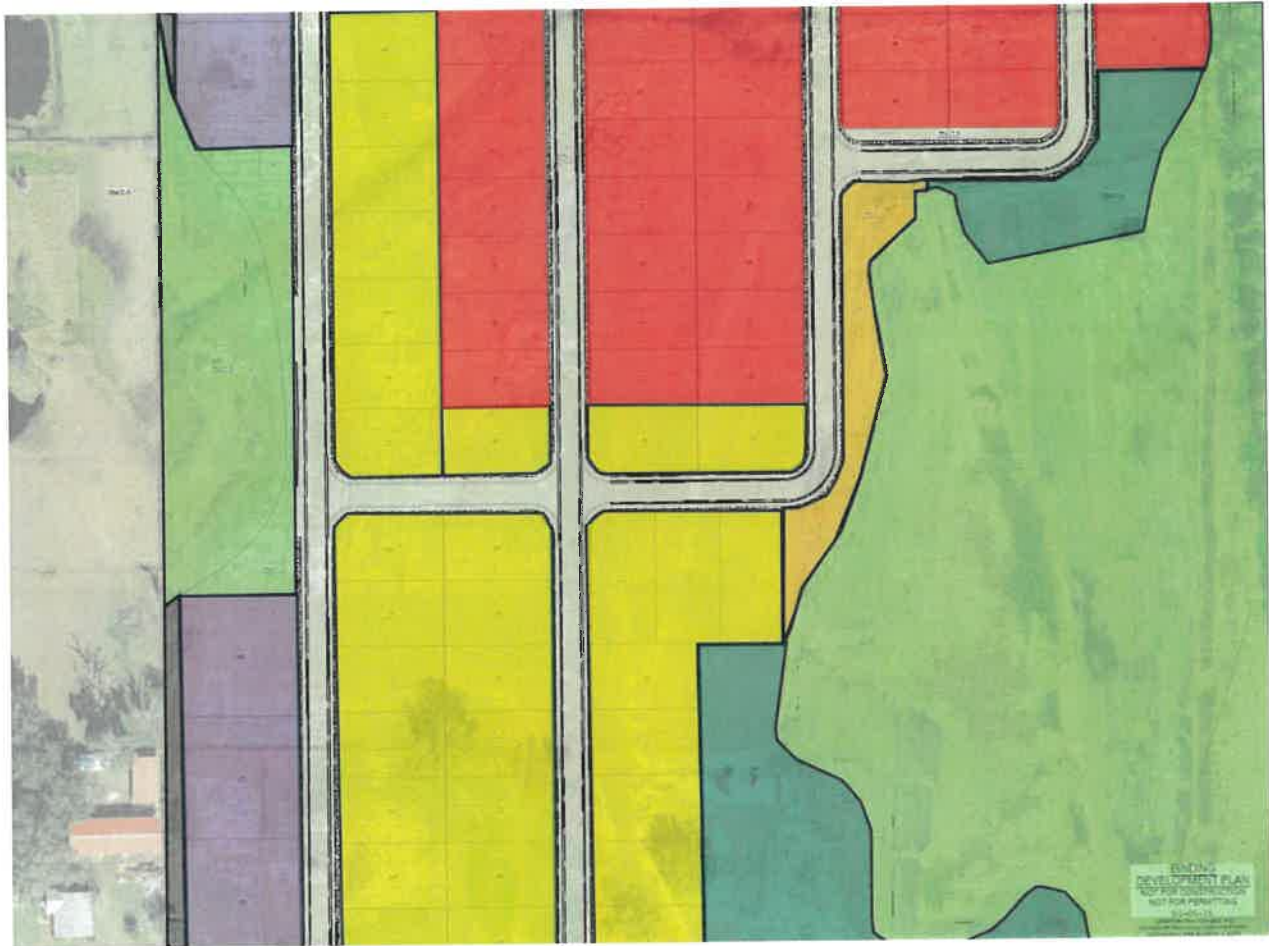
**EXHIBIT 2a
NORTH QUADRANT**



COLOR CODE:

- Purple = Largest Perimeter Transition Lots - 0.50 Acre
- Yellow = Intermediate Transition Lots - 0.25 Acre
- Red = Interior Clustered Lots (Minimum RRD Lot Size) - 0.215 Acre
- Green/Blue = Open Space, Wetlands, Floodplain, Preservation/Stormwater Tracts
- Orange = Amenity Tracts

**EXHIBIT 2b
MIDDLE QUADRANT**



COLOR CODE:

- Purple = Largest Perimeter Transition Lots - 0.50 Acre
- Yellow = Intermediate Transition Lots - 0.25 Acre
- Red = Interior Clustered Lots (Minimum RRD Lot Size) - 0.215 Acre
- Green/Blue = Open Space, Wetlands, Floodplain, Preservation/Stormwater Tracts
- Orange = Amenity Tracts

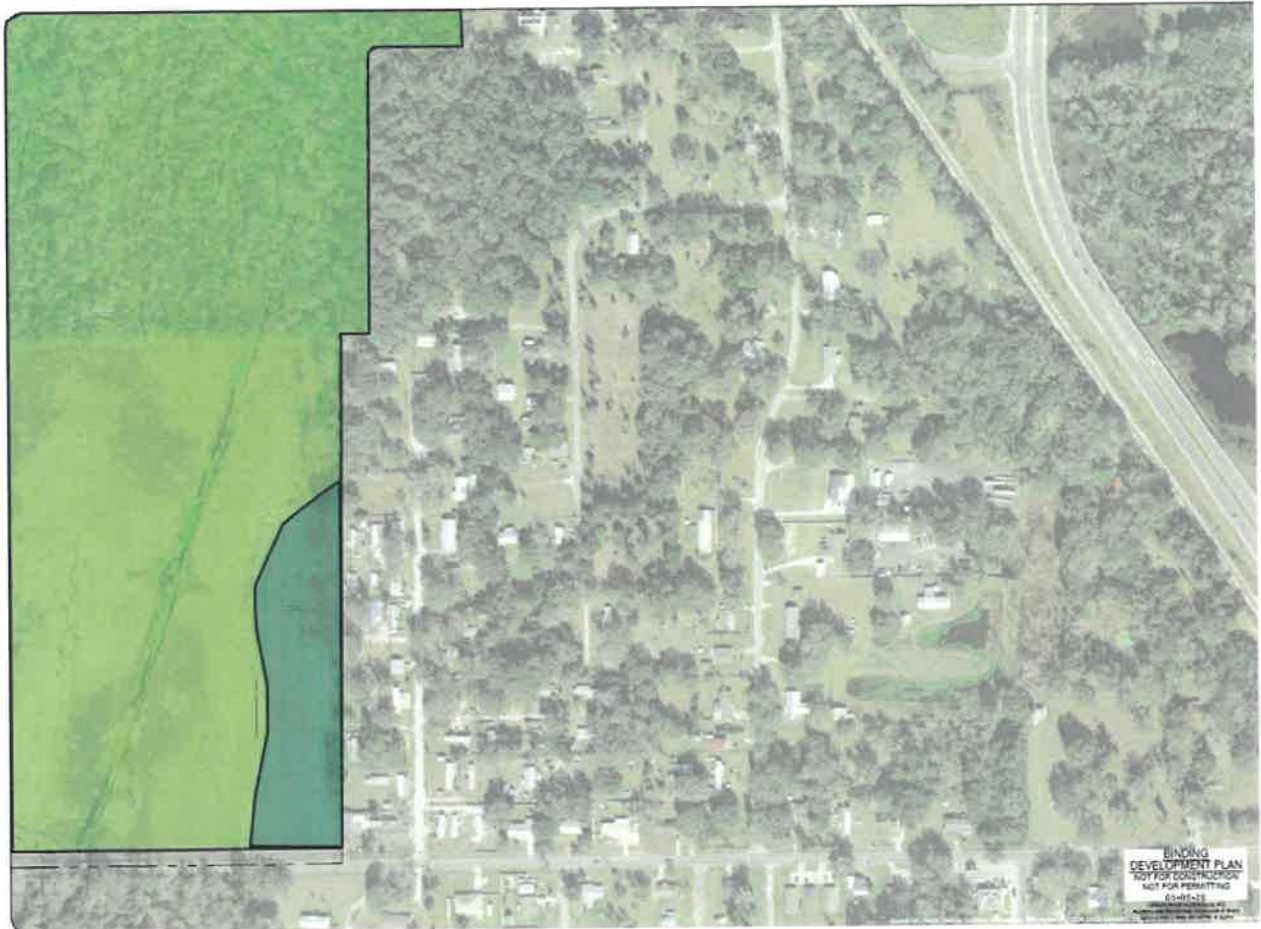
**EXHIBIT 2c
SOUTHWEST QUADRANT**



COLOR CODE:

- Purple = Largest Perimeter Transition Lots - 0.50 Acre
- Yellow = Intermediate Transition Lots - 0.25 Acre
- Red = Interior Clustered Lots (Minimum RRD Lot Size) - 0.215 Acre
- Green/Blue = Open Space, Wetlands, Floodplain, Preservation/Stormwater Tracts
- Orange = Amenity Tracts

EXHIBIT 2d
SOUTHEAST QUADRANT



COLOR CODE:

- Purple = Largest Perimeter Transition Lots - 0.50 Acre
- Yellow = Intermediate Transition Lots - 0.25 Acre
- Red = Interior Clustered Lots (Minimum RRD Lot Size) - 0.215 Acre
- Green/Blue = Open Space, Wetlands, Floodplain, Preservation/Stormwater Tracts
- Orange = Amenity Tracts

EXHIBIT 3 OPEN SPACE & PRESERVATION INVENTORY

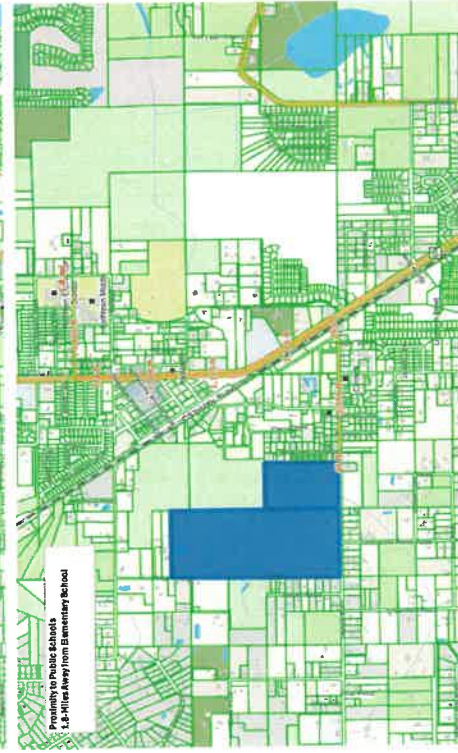
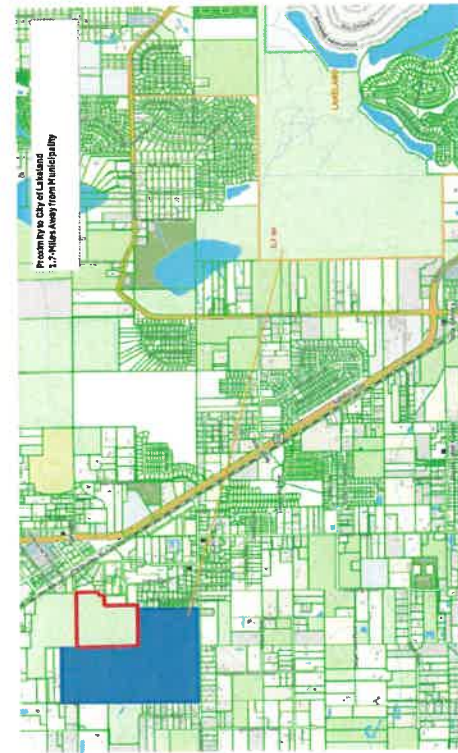
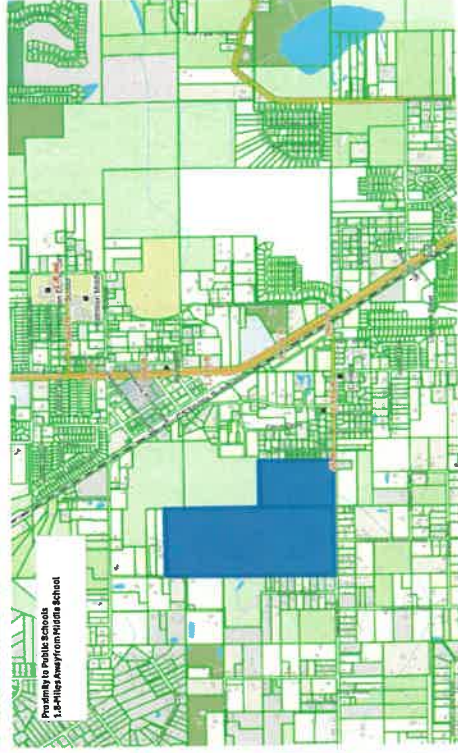
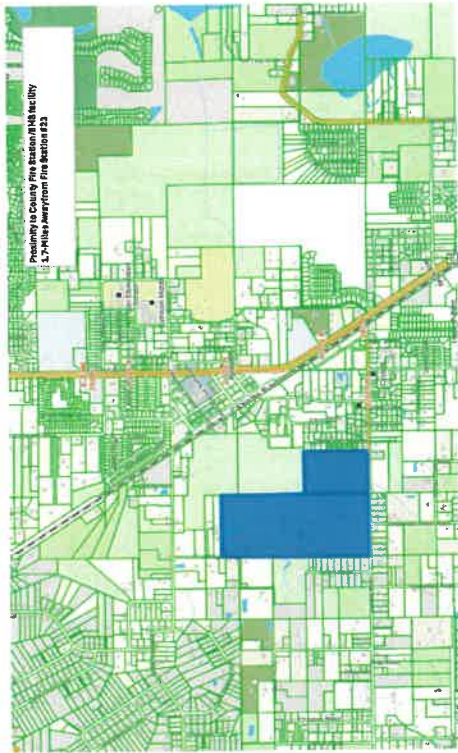
KATHLEEN RESERVE RRD TRACT TABLE		OWNERSHIP	ACREAGE	% OVERALL	RESERVED
TABLE 1 - LEGALLY RESTRICTED LAND					
TRACTS: CONSERVATION, EXISTING AGRICULTURAL OPEN SPACE, AND HYDROLOGIC FUNCTION:					
TRACT	USE (1)	USE (2)			
A	CONSERVATION EASEMENT	WETLANDS	1.07	0.70%	1.07
B	CONSERVATION EASEMENT	WETLANDS	1.60	1.05%	1.60
C	CONSERVATION EASEMENT	WETLANDS	1.42	0.92%	1.42
D	CONSERVATION EASEMENT	WETLANDS	69.07	45.08%	69.07
E	RRD RESERVED AGRICULTURAL OPEN SPACE	OPEN SPACE / HABITAT PROTECTION AREA	0.17	0.11%	0.17
F	RRD RESERVED AGRICULTURAL OPEN SPACE	OPEN SPACE / HABITAT PROTECTION AREA	0.61	0.40%	0.61
G	RRD RESERVED AGRICULTURAL OPEN SPACE	OPEN SPACE / HABITAT PROTECTION AREA	0.26	0.17%	0.26
H	RRD RESERVED AGRICULTURAL OPEN SPACE	AGRICULTURAL OPEN SPACE WITH FLOODPLAIN STORAGE, WATER QUALITY ENHANCEMENT & STORM ATTENUATION FUNCTION			
N	RRD RESERVED AGRICULTURAL OPEN SPACE [HYDROLOGIC]	AGRICULTURAL OPEN SPACE WITH FLOODPLAIN STORAGE, WATER QUALITY ENHANCEMENT & STORM ATTENUATION FUNCTION	13.83	9.03%	13.83
O	RRD RESERVED AGRICULTURAL OPEN SPACE [HYDROLOGIC]	AGRICULTURAL OPEN SPACE WITH FLOODPLAIN STORAGE, WATER QUALITY & NUTRIENT REDUCTION FUNCTION	3.97	2.56%	3.97
J	RRD RESERVED AGRICULTURAL OPEN SPACE	OPEN SPACE / HABITAT PROTECTION AREA	0.48	0.31%	0.48
R	RRD RESERVED AGRICULTURAL OPEN SPACE [HYDROLOGIC]	AGRICULTURAL OPEN SPACE WITH FLOODPLAIN STORAGE & HYDROLOGIC FUNCTION	0.80 93.28	0.52% 60.88%	0.80 93.28
TABLE 2 - USABLE RESIDENTIAL SPACE					
TRACTS: PROGRAMMED OPEN SPACE, PASSIVE RECREATION AND AMENITIES:					
TRACT	USE (1)	USE (2)	ACREAGE	% OVERALL	RESERVED
I	OPEN SPACE	AMENITY	0.44	0.29%	0.00 AC
K	OPEN SPACE	AMENITY	0.59	0.38%	0.00 AC
L	OPEN SPACE	AMENITY	0.45	0.30%	0.00 AC
M	OPEN SPACE	STORM WATER MANAGEMENT	4.91	3.20%	0.00 AC
Q	OPEN SPACE	AMENITY	0.57	0.37%	0.00 AC
V	OPEN SPACE	AMENITY	0.57 7.53	0.37% 4.91%	0.00 AC 0.00 AC
TABLE 3 - NON QUALIFYING TRACTS					
TRACTS: RIGHT OF WAY, STREETS, LIFT STATION AND NON-QUALIFYING OPEN SPACE:					
TRACT	USE (1)	USE (2)	ACREAGE	% OVERALL	RESERVED
(N/A)	RIGHT-OF-WAY DEDICATION	DEESON ROAD FRONTAGE	2.06	1.35%	0.00 AC
(N/A)	INTERNAL RIGHT-OF-WAY	RURAL RESIDENTIAL STREETS	10.56	6.89%	0.00 AC
F	20' PERIMETER LANDSCAPE BUFFER	OPEN SPACE	0.37	0.24%	0.00 AC
P	LIFT STATION	LIFT STATION	0.04	0.02%	0.00 AC
S	10' ROW LANDSCAPE BUFFER	OPEN SPACE	0.09	0.06%	0.00 AC
T	10' ROW LANDSCAPE BUFFER	OPEN SPACE	0.08	0.06%	0.00 AC
U	20' PERIMETER LANDSCAPE BUFFER	OPEN SPACE	0.58 14.17	0.63% 9.25%	0.00 AC 0.00 AC
TOTAL OPEN SPACE [RRD SCORE QUALIFYING & NON-QUALIFYING]			114.98	% OVERALL	75.04%

EXHIBIT 4
RRD SCORESHEET NARRATIVE

ATTACHED

CRITERIA / DESCRIPTION

CRITERIA / DESCRIPTION	POINTS AWARDED	QUALIFICATION / BASIS
<p>Density/Catagogy</p> <p>a.) Table 3.2: The site is within 0.01 to 0.20 miles of a designated land use classification (Rural Cluster Center, Business Park Center, Linear Commercial Corridor, or a Municipality) (Up to 4)</p>	20	<p>Qualification</p> <p>The subject property is approximately 1.7 miles away from the City of Lakeland as measured from the nearest point of the subject property to the municipal boundary. The project is awarded 20 points based on municipal proximity.</p>
<p>b.) 20 density bonus points are awarded to the development if the site is located within five (5) miles of a County operated fire station, or city operated fire station under contract to the County, having an Insurance Safety Organization (ISO) rating of six (6) or better as measured along the shortest driving distance to nearest point on the subject property and the facility or 10 density bonus points are awarded to the development if the site is located within five (5) miles of a County operated fire station, or city operated fire station under contract to the County, having an ISO rating of eight (8) or better.</p>	20	<p>The subject property is approximately 1.7 miles away from the Polk County Fire Station #23 which has an Insurance Safety Organization (ISO) rating of six (6) or better as measured along the shortest driving distance to nearest point on the subject property and the facility. The project is awarded 20 points based on fire station proximity.</p>
<p>c.) 20 density bonus points are awarded to the development if the site is located within five (5) miles of a County EMS facility as measured along the shortest driving distance to nearest point on the subject property and the facility or 10 density bonus points are awarded to the development if the site is located within eight (8) miles of a County EMS facility.</p>	20	<p>The subject property is well within the five (5) mile distance requirement of a County EMS facility. The subject property is approximately 1.7 miles from Fire Station #23 which is a County EMS facility. The project is awarded 20 points based on County EMS proximity.</p>
<p>d.) 20 density bonus points are awarded to the development if the site is adjacent to an arterial roadway or 10 density bonus points are awarded to the development if the site is adjacent to a collector roadway or five (5) density bonus points are awarded to the development if the site is adjacent to a local roadway.</p>	10	<p>The subject property is adjacent to Dawson Road which is classified as a Collector / Rural Minor Collector per Polk County Functional Classification. The project is awarded 10 points based off of adjacency to a collector roadway.</p>
<p>e.) 20 density bonus points are awarded to the development if all of it is connected to an existing public or franchised wastewater treatment system with planned capacity to serve the development.</p>	20	<p>The subject property shall connect to an existing public wastewater system with available capacity. The service lines already lead up and pass the site. The project is awarded 20 points based on its expected wastewater connection that is available at the site.</p>
<p>f.) 10 density bonus points are awarded to the development if the site is located within two (2) miles of a public school and requires no bussing as verified by the school board.</p>	10	<p>The subject property is located within 2 miles of public schools and does not require bussing (subject to school board confirmation). The project is awarded 10 points based on public school proximity.</p>
<p>g.) Table 3.6: The following additional bonus points shall be awarded for reserving land in excess of the required 50 percent reservation</p>	20	<p>The legally restricted land (open-space reservation) of the project totals 60.85% which is in excess of the required 50% requirement of the RRD. Per Table 3.6, this amounts to 20 points.</p>
<p>h.) Table 3.7: Additional Density Bonus Points (no more than 20 points may be granted from Table 3.7)</p>	4	<p>The project shall have all utilities underground. The project utilities include electric, telephone and cable tv.</p>
<p>1. Placement of electric, telephone and cable TV utilities underground (4)</p>	2	<p>The subject property is currently utilized as a horse-fide agricultural operation (feed farm) and a substantial portion of the site is preserved as agricultural/open space within the RRD land reservation areas. Agricultural classification (greenbelt exemption) will be maintained where applicable.</p>
<p>2. Preservation of existing horse-fide agricultural uses and improvements (2)</p>	0	N/A
<p>3. Shared or common access driveways (4)</p>	3	<p>The project utilizes a clustered development pattern to preserve large contiguous areas of open space, including agricultural and floodplain lands. The project will feature scenic views of open space and water shed across the property. Residential lots are concentrated in defined areas, allowing uninterrupted views across preserved open space tracts.</p>
<p>4. Preservation of view sheds/scenic views through clustering or other design techniques (2)</p>	0	N/A
<p>5. Restrictions on lot clearing (for undeveloped land) to either 50% of the lot, or 25,000 SQ. FT, whichever is less (3)</p>	0	N/A. There are no existing agricultural structures as the subject property has/is operated as a soif farm.
<p>6. Preservation/re-use of existing agricultural structures and improvements (4)</p>	4	<p>The project provides neighborhood parks, passive open space areas, a children's playground, and a trail system within common areas accessible to all residents. These amenities are integrated within the project's open space network and designed to serve a range of recreational needs.</p>
<p>7. Provision of neighborhood parks, tot lots, recreation facilities, etc. in common areas (4)</p>	4	<p>The project provides a connected open space system through large contiguous preserved areas and linked floodplain and habitat corridors, creating continuous open space across the site. These areas function as an integrated network of conservation, agricultural, and hydrologic open space.</p>
<p>8. Connected open space through either broad banding of reserved open space between parcels, open space corridors, or a combination (4)</p>	2	<p>The project includes a coordinated, project-wide master landscape plan incorporating street trees, entry features, tree preservation, and shading techniques throughout the development.</p>
<p>9. Project-wide Master Landscape Plan including specific tree preservation, shading techniques, etc. (2)</p>	2	
<p>2) Residential Rural Development Density Application Notes: Density points shall only be awarded for only one item (the highest) in each Density Schedule Category (A-B). An RRD must achieve a minimum of 50 points. Bonus points in Categories C-D shall only be awarded if the property first qualifies for density points under any of the items in Categories A-B. In no case shall the density earned be greater than one dwelling unit to one acre. Total Score =</p>	139	<p>QUALIFIES FOR DENSITY CATEGORY A-B CRITERIA</p> <p>EXCEEDS MINIMUM 50-POINT THRESHOLD REQUIRED FOR RRD</p> <p>DENSITY SHALL NOT EXCEED 1 UNIT/ACRE</p>
<p>3) Proposed Units (SF Lots) =</p>	150	
<p>Parcel Area =</p>	153.25 Ac	
<p>Proposed Density =</p>	0.975 DU / Ac	
<p>Per Table 3.6 RRD Density Conversion Table based on total score of RRD points scored =</p>	1,000 DU / Ac (CAPPED)	
<p>Max Density Permitted</p>		



KATHLEEN RESERVE RRD

SUPPLEMENTAL PLANNING & DEVELOPMENT PATTERN ANALYSIS

**Contextual Planning Analysis Supporting the Kathleen Reserve Rural
Residential Development (RRD)**

Polk County, Florida

**Prepared For:
Polk County Planning Commission**

June 2026

CONTENTS INCLUDE:

- **Surrounding Development Pattern Analysis**
- **Historical Planned Development (PD/SPD/RID) Context**
- **SDA Infrastructure & Public Investment Context**
- **Compatibility & Transitional Development Analysis**
- **Historical Entitlement & Development Pattern References**
- **Supporting Planning Research & Contextual Exhibits**

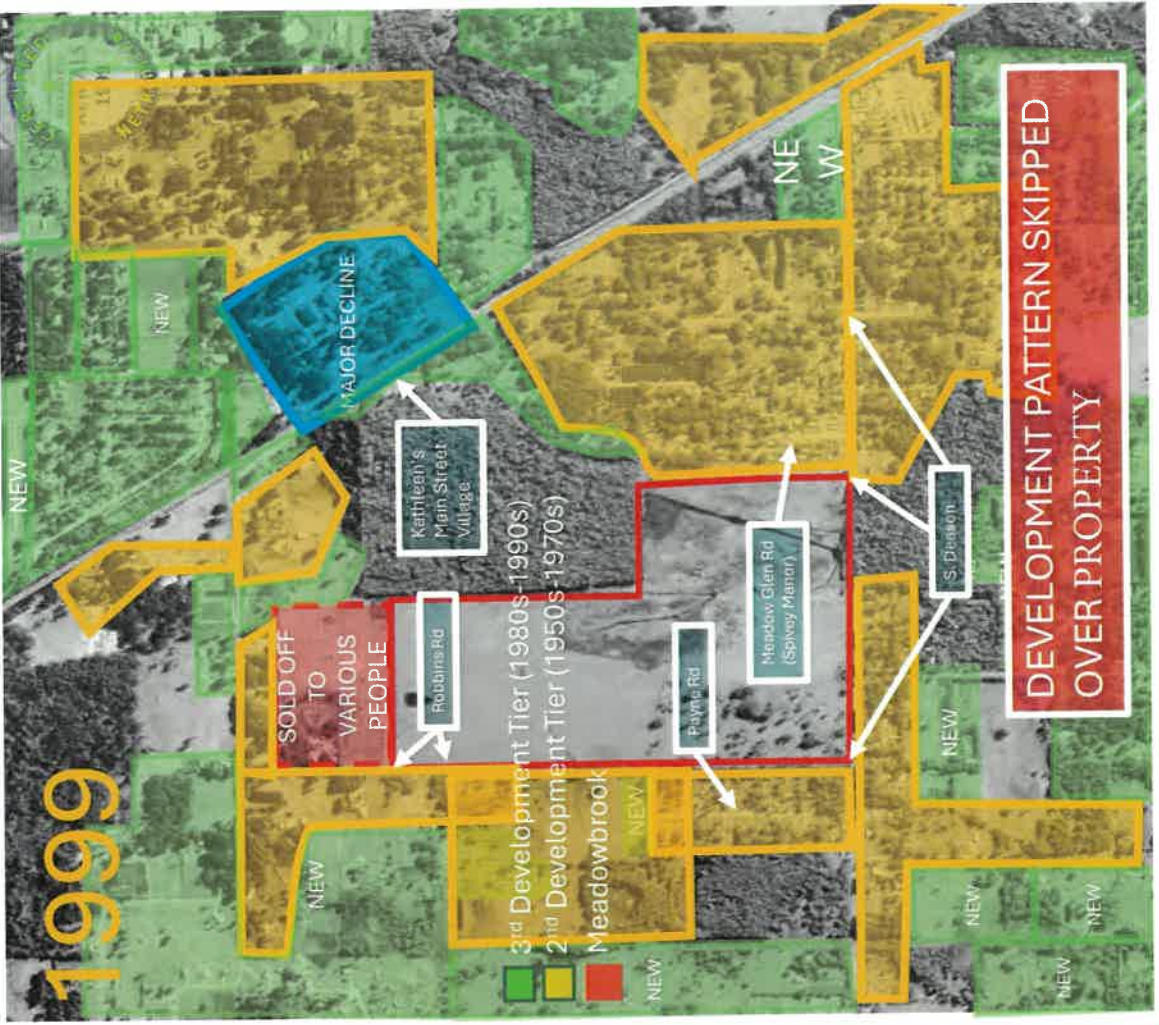
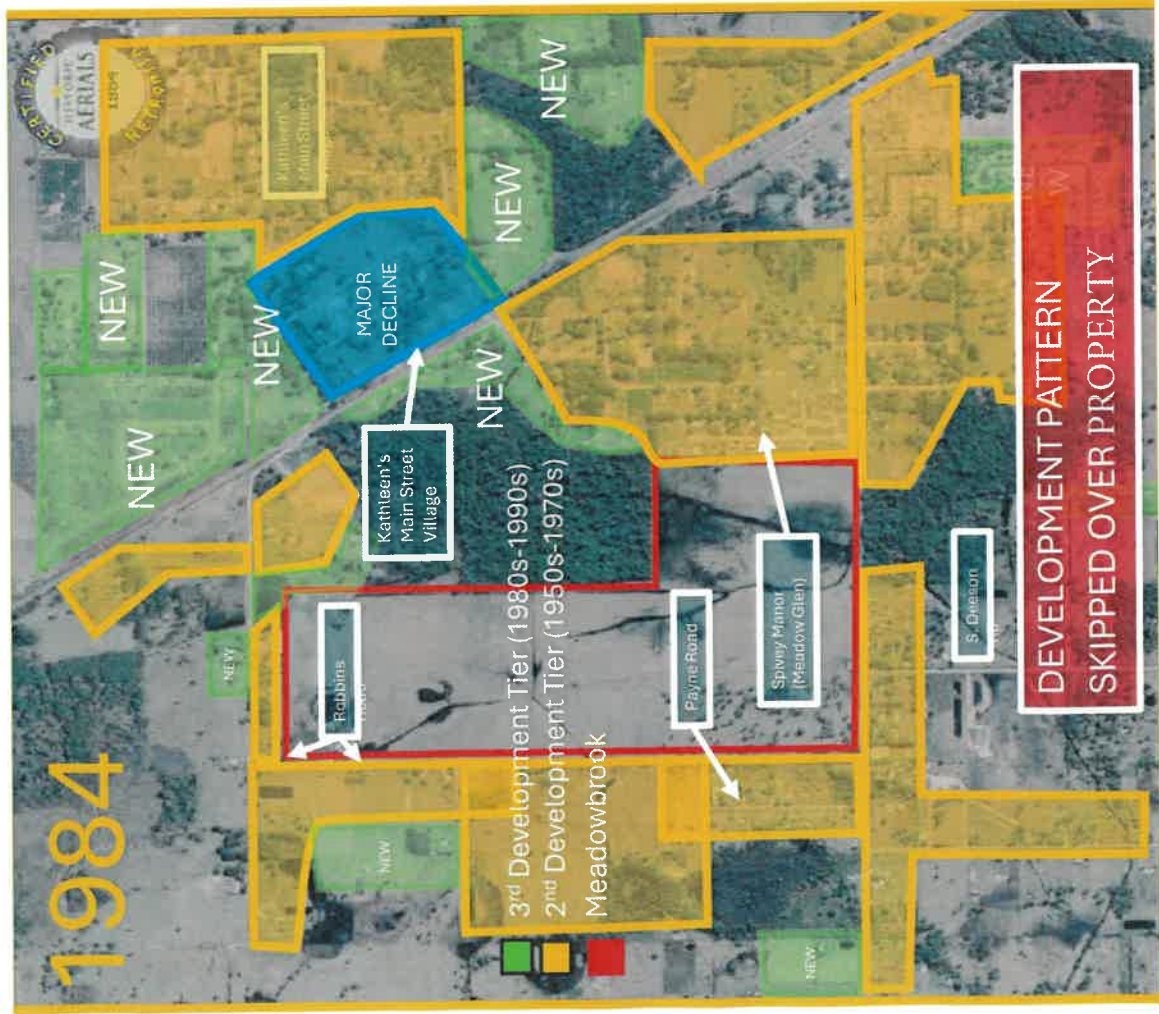
This document is intended to supplement the Kathleen Reserve RRD Planning Commission Memorandum and provide additional contextual planning analysis, development pattern evaluations, infrastructure context, and supporting reference materials relevant to the proposed Rural Residential Development (RRD) application.



KATHLEEN RESERVE RRD

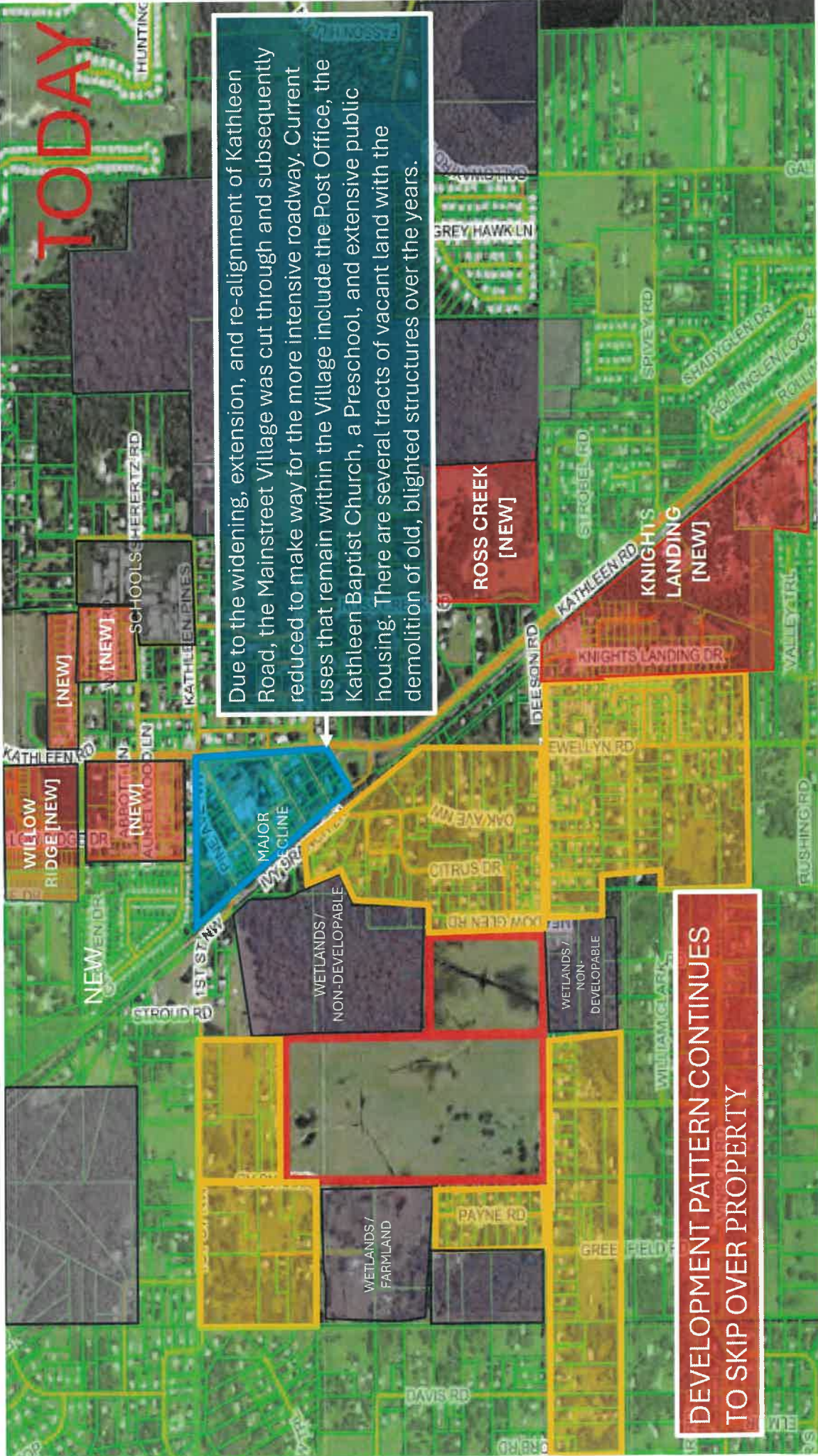
SECTION 1

**HISTORICAL DEVELOPMENT
PATTERNS**



TODAY

Due to the widening, extension, and re-alignment of Kathleen Road, the Mainstreet Village was cut through and subsequently reduced to make way for the more intensive roadway. Current uses that remain within the Village include the Post Office, the Kathleen Baptist Church, a Preschool, and extensive public housing. There are several tracts of vacant land with the demolition of old, blighted structures over the years.



DEVELOPMENT PATTERN CONTINUES TO SKIP OVER PROPERTY



CONCLUSION – ANALYSIS OF DEVELOPMENT PATTERNS AROUND PROPERTY

- The development pattern is clearly defined by various roads, densities, residential lot sizes, and residential developments that abut the subject site. Roads define the subject site on the north and NW by Robbins Road, south by Deeson Road and east by a deeded road and easements in the adjacent Meadow Glen mobile home park. Large wetland tracts exist due west, south, and NE that further define the subject site.
- The subject site was skipped over/leap frogged by suburban sprawl. There are examples of residential in the A/RR that are greater than 3 du/ac that are proximate to the site and lots as small as 7,500 SF [legal lot of record] that is adjacent to the site in the A/RR. There are examples in the RS that are greater than 5 du/ac such as Meadow Glen (and others) which is adjacent to the site. Multiple dwelling units on individual lots are also prevalent in the A/RR, in most cases on lots smaller than 1-ac that abut the site.
- Development at this location is generally compatible as determined by Polk County staff per the subject site's CPA report (analysis based on maximum allowed density) and multiple SPD reports. This Residential Infill supports the intent of the RS land use district to serve as the proper transition of land from rural to urban areas.
- Due to the disinvestment of surrounding lots that occurred over time and resulted in blighted, low quality housing stock, this residential infill development will revitalize the neighborhood and promote reinvestment and cure blighted parcels around the subject site. It also provides new stock to the failing and aged housing stock in the area.
- According to Polk County, density is not considered significantly different if it is at or below 50% of the surrounding density. Averaged densities around the property are 1.33 du/ac. Adding 49% to the surrounding averaged density equates to 2.07 du/ac. Density between 1.33 du/ac to 2.07 du/ac is consistent with the surrounding density average of lots abutting the subject site.
- This is 0.47 miles away from another Residential Infill Development known as Knights Landing which is supported by the same service standards at the subject site.



KATHLEEN RESERVE RRD

SECTION 2

**ADJACENT DEVELOPMENT
PATTERN ANALYSIS**

NORTH ROBBINS ROAD (ADJ)

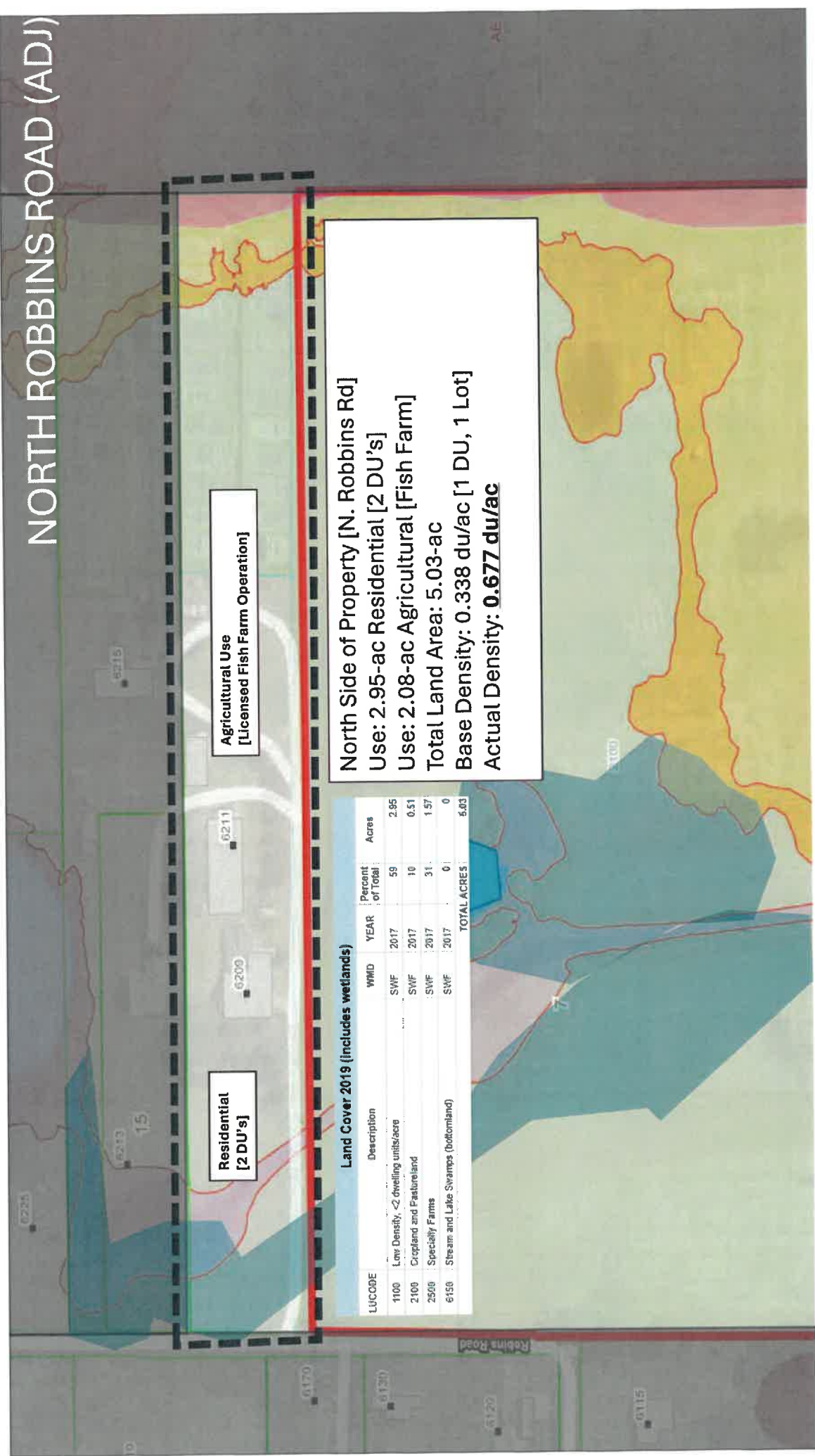
**Residential
[2 DU's]**

**Agricultural Use
[Licensed Fish Farm Operation]**

North Side of Property [N. Robbins Rd]
 Use: 2.95-ac Residential [2 DU's]
 Use: 2.08-ac Agricultural [Fish Farm]
 Total Land Area: 5.03-ac
 Base Density: 0.338 du/ac [1 DU, 1 Lot]
 Actual Density: **0.677 du/ac**

Land Cover 2019 (includes wetlands)

LUCODE	Description	WMD	YEAR	Percent of Total	Acres
1100	Low Density, <2 Dwelling units/acre	SWF	2017	59	2.95
2100	Cropland and Pastureland	SWF	2017	10	0.51
2500	Specialty Farms	SWF	2017	31	1.57
6150	Stream and Lake Swamps (bottomland)	SWF	2017	0	0
				TOTAL ACRES	5.03



NORTHEAST CORNER (ADJ.)



WETLANDS /
NON-DEVELOPABLE

EAST SIDE (ADJ.)

East Side of Property [Meadow Glen Rd]

Use: Residential

Lot Sizes: 0.12-ac to 0.43-ac

Typical Lot Size: 0.12-ac (4 of 6 adj. lots)

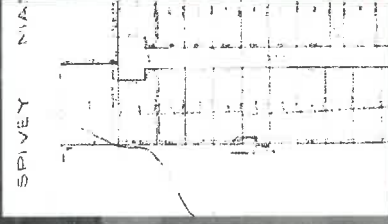
Smallest Adj. Lot: 0.12-ac

Largest Adj. Lot: 0.43-ac

Total Land Dev Area: 1.33 Acres [8 DU's]

Unweighted Density: 4.51 du/ac [6 du, 6 lots]

Actual Density: **6.01 du/ac**



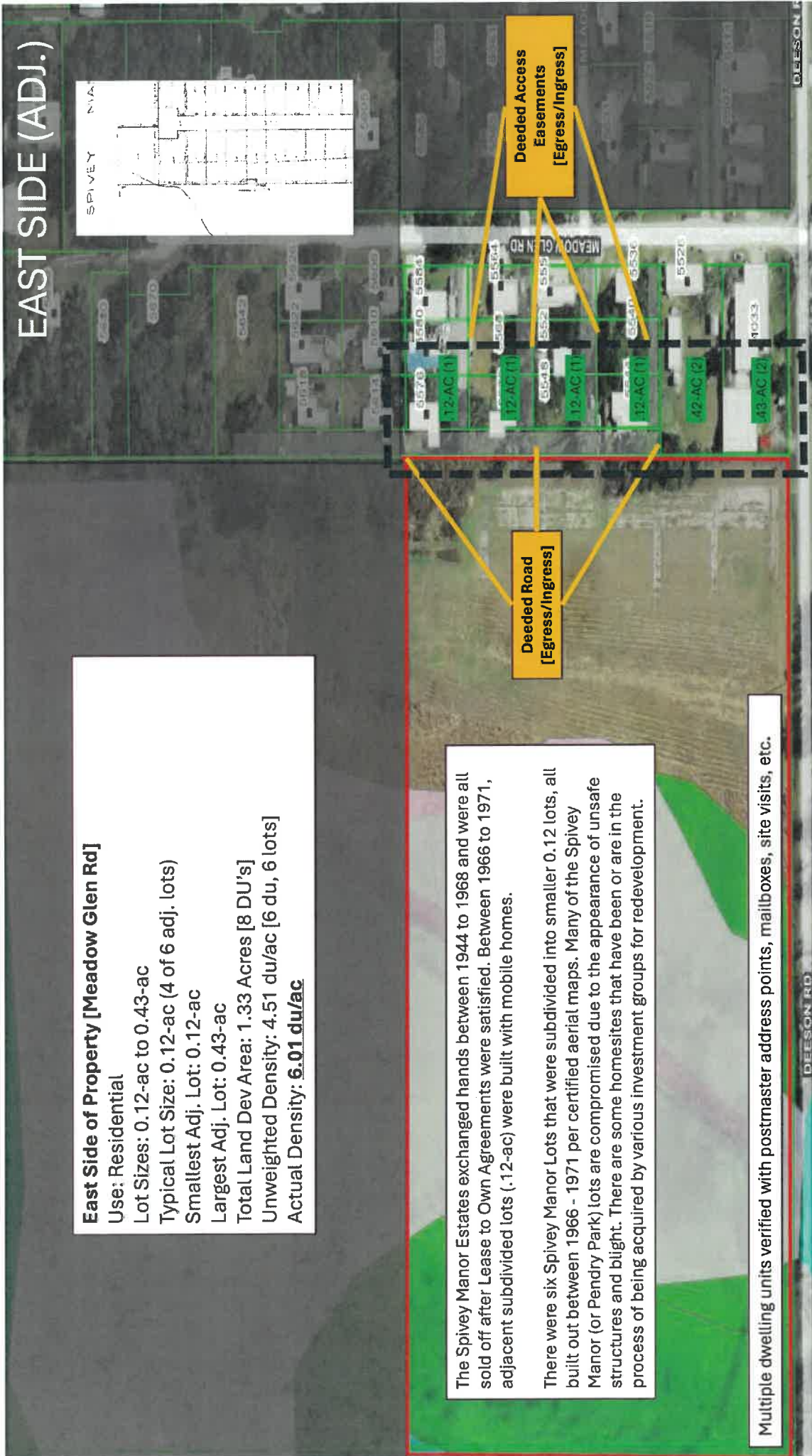
The Spivey Manor Estates exchanged hands between 1944 to 1968 and were all sold off after Lease to Own Agreements were satisfied. Between 1966 to 1971, adjacent subdivided lots (.12-ac) were built with mobile homes.

There were six Spivey Manor Lots that were subdivided into smaller 0.12 lots, all built out between 1966 - 1971 per certified aerial maps. Many of the Spivey Manor (or Pendry Park) lots are compromised due to the appearance of unsafe structures and blight. There are some homesites that have been or are in the process of being acquired by various investment groups for redevelopment.

Multiple dwelling units verified with postmaster address points, mailboxes, site visits, etc.

Deeded Road
[Egress/Ingress]

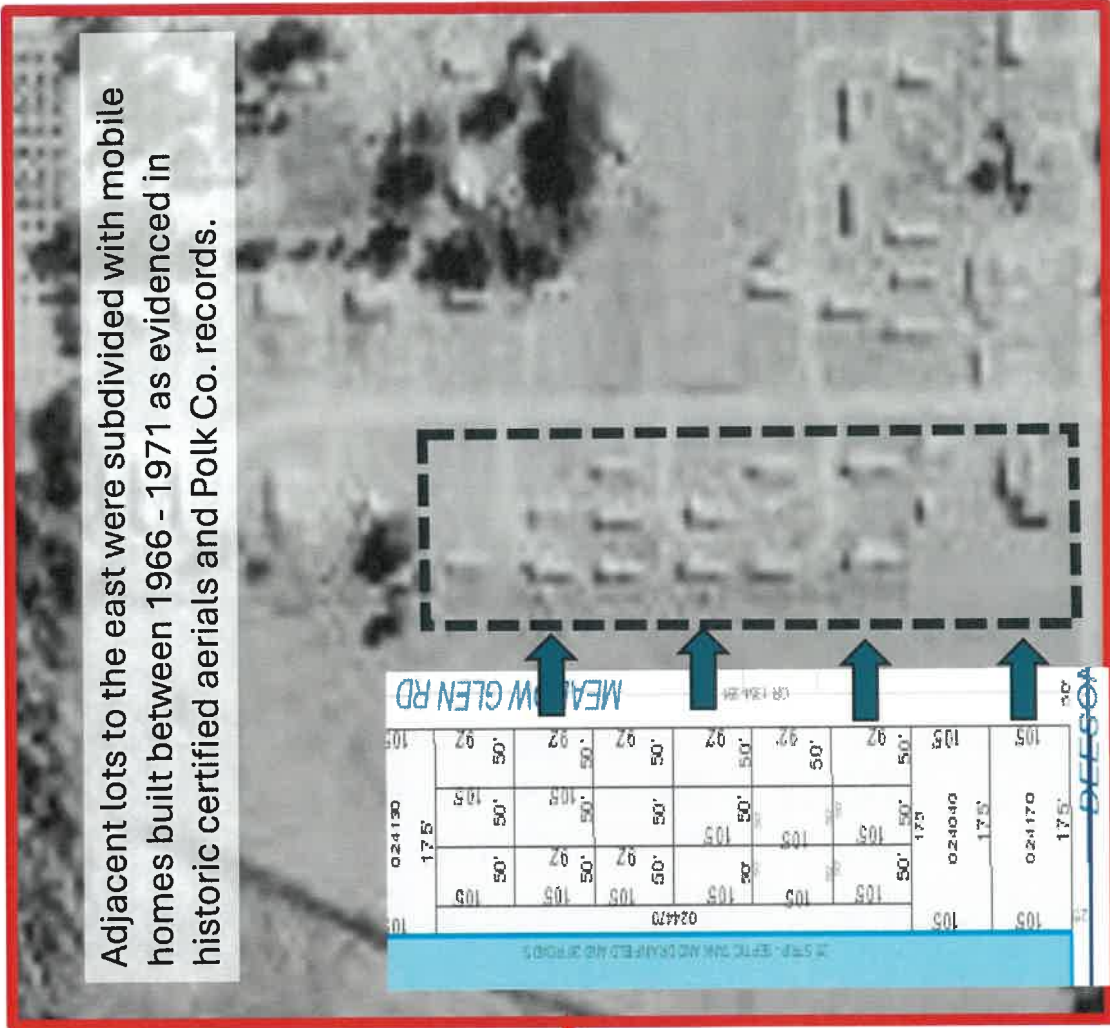
Deeded Access
Easements
[Egress/Ingress]

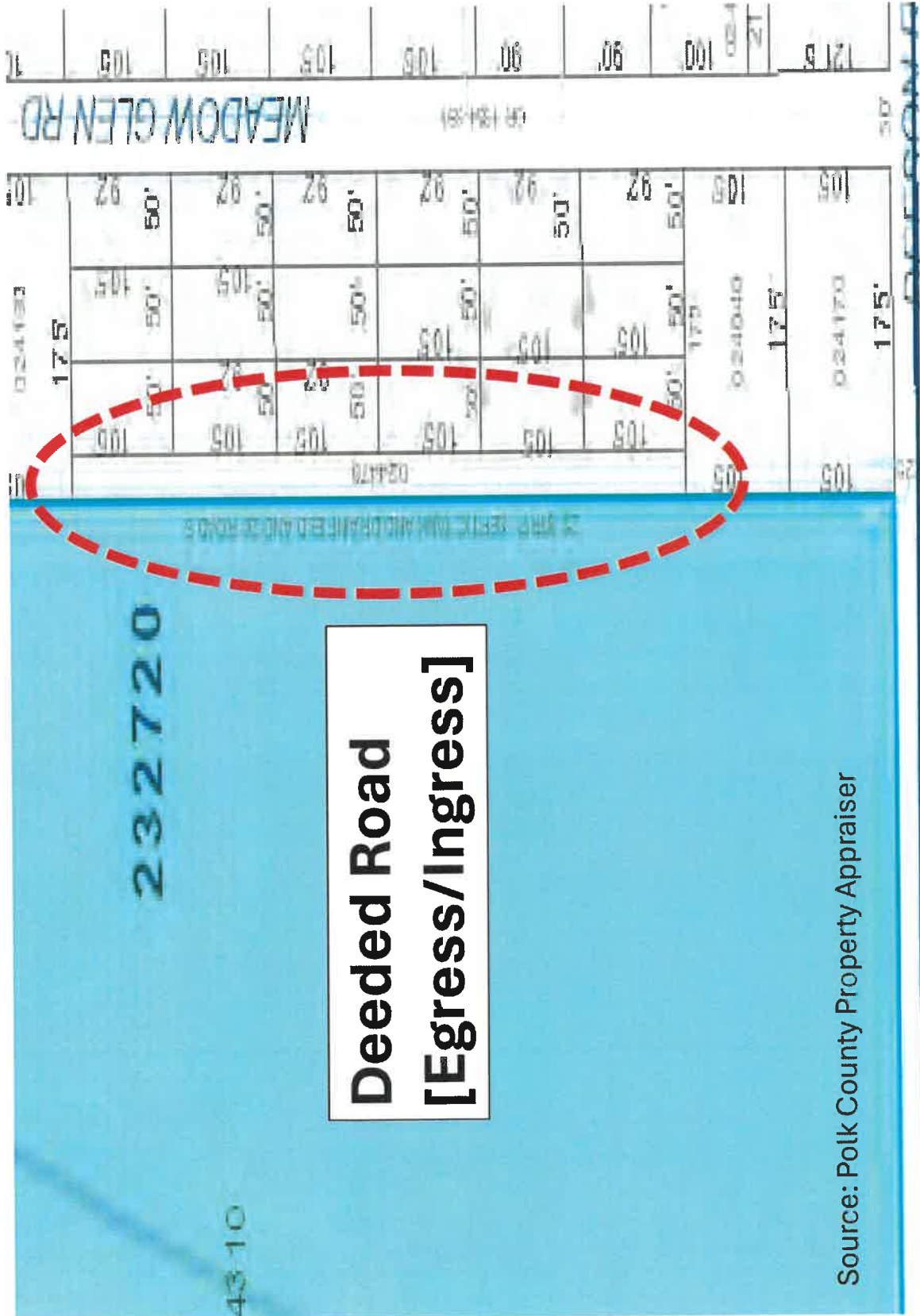


**MEADOW GLEN ROAD (ADJ)
aka Spivey Manor Plat Subdivision**



Adjacent lots to the east were subdivided with mobile homes built between 1966 - 1971 as evidenced in historic certified aerials and Polk Co. records.





232720

43-10

**Deeded Road
[Egress/Ingress]**

Source: Polk County Property Appraiser

South Side of Property [S. Deeson Rd Lots]
 Land Use: Residential & Wetlands
 Lot Sizes: 0.38-ac to 1.00-ac
 Typical Lot Size: 0.88-ac (8 of 11 adj lots)
 Smallest Adj. Lot: 0.38-ac
 Largest Adj. Lot: 1.00-ac
 Total Land Dev. Area: 9.17 Acres [18 DU's]
 Unweighted Density: 1.19 du/ac [11 du, 11 lots]
 Actual Density: 1.96 du/ac

Parcel	Parcel	Parcel	Parcel
<p>Owner Name: FERRILL MARY BEATRICE CARRANZA Site Address: 4340 DEESON RD County: POLK Last Sale: 30/21/14/243 Parcel: 2327260000001596 Acres: 0.88 Land Use: Multi Family under 10 Units Zone: CDR Lat/Long of House: 28.112816, -82.034145</p> <p>Presently Occupied: Front Home Inspection Details Google StreetView Bing Satellite Bing Bird's Eye Google Maps / Directions</p>	<p>Owner Name: NATTIE PATRICK V ESTATE OF Site Address: 4338 DEESON RD County: POLK Last Sale: 30/09/2001/163-01-01 Parcel: 2327260000001600 Acres: 0.88 Land Use: Mobile Homes Zone: CDR Lat/Long of House: 28.112805, -82.034159</p> <p>Presently Occupied: Front Home Inspection Details Google StreetView Bing Satellite Bing Bird's Eye Google Maps / Directions</p>	<p>Owner Name: BRIDGES TER L Site Address: 4950 DEESON RD County: POLK Last Sale: 31/01/06/06-01 Parcel: 23272600000013110 Acres: 1.00 Land Use: Mobile Homes Zone: CDR Lat/Long of House: 28.112989, -82.028992</p> <p>Presently Occupied: Front Home Inspection Details Google StreetView Bing Satellite Bing Bird's Eye Google Maps / Directions</p>	<p>Owner Name: NATTIE PATRICK V ESTATE OF Site Address: 4338 DEESON RD County: POLK Last Sale: 30/09/2001/163-01-01 Parcel: 2327260000001600 Acres: 0.88 Land Use: Mobile Homes Zone: CDR Lat/Long of House: 28.112805, -82.034159</p> <p>Presently Occupied: Front Home Inspection Details Google StreetView Bing Satellite Bing Bird's Eye Google Maps / Directions</p>



SOUTH DEESON ROAD (ADJ)

Multiple dwelling units verified with postmaster address points, mailboxes, site visits, etc.

Multiple dwelling units verified with postmaster address points, mailboxes, site visits, etc.



4.20-AC, WETLANDS

11.40-AC, AG. USE.

15.60 AC

0

2 3.89 AC
 2 3.81 AC
 1 1.04 AC
 1 .93-AC
 1 .93-AC
 1 .93-AC
 1 .93-AC
 1 .83 AC
 1 24-AC (1)
 1 76-AC (1)

MULTIPLE DWELLING
UNITS ON ONE
PARCEL [ACTIVE
RENTAL LISTINGS]

NON-DEVELOPABLE
WETLANDS

SW PAYNE ROAD (ADJ)

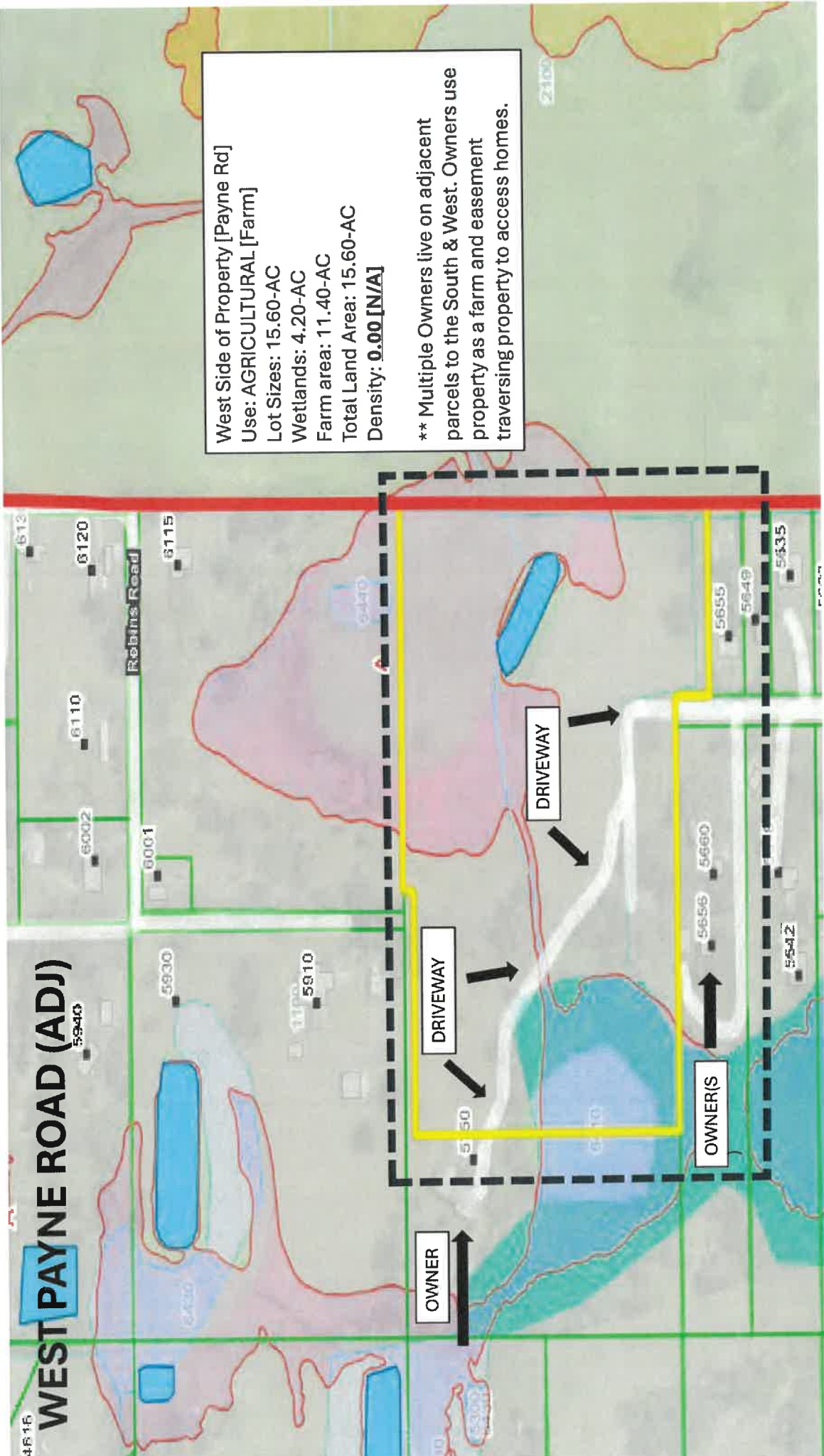
Southwest Side of Property [Payne Rd Lots]
 Use: Residential
 Lot Sizes: 0.46-ac to 1.00-ac
 Typical Lot Size: 0.93-ac
 Smallest Adj. Lot: 0.46-ac
 Largest Adj. Lot: 1.20-ac [0.85-ac Dev Area]
 Total Dev Area: 7.79-ac [13 DU's]
 Unweighted Density: 1.28 du/ac [10 du, 10 lots]
 Actual Density: **1.66 du/ac**

.58-AC
 .46-AC
 .70-AC
 .93-AC
 .93-AC
 .93-AC
 .93-AC [0.86 Dev Area]
 .93-AC [0.81 Dev Area]
 .93-AC [0.74 Dev Area]
 1.20-AC [0.85 Dev Area]

DEESON RD

DEESON RD

WEST PAYNE ROAD (ADJ)

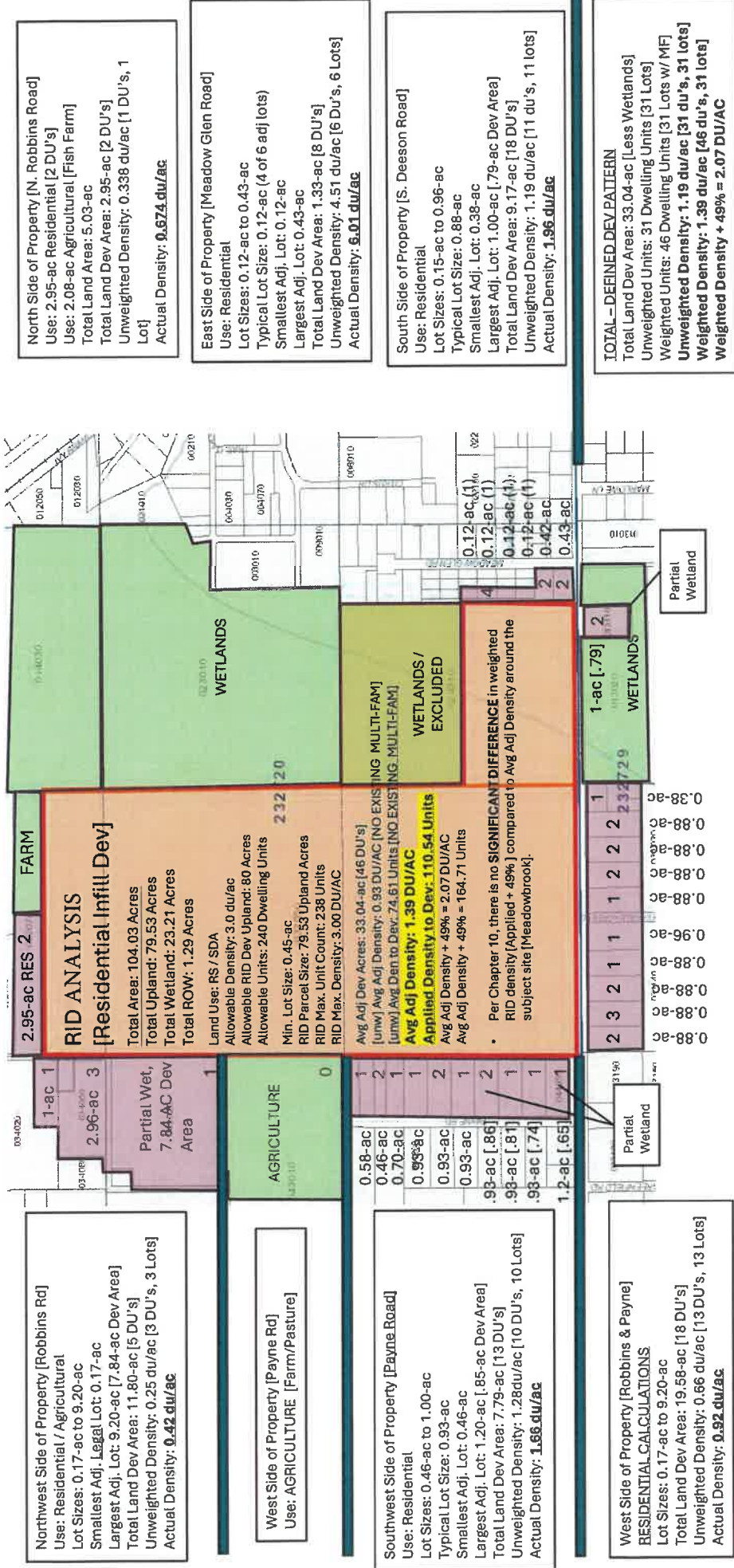


West Side of Property [Payne Rd]
Use: AGRICULTURAL [Farm]
Lot Sizes: 15.60-AC
Wetlands: 4.20-AC
Farm area: 11.40-AC
Total Land Area: 15.60-AC
Density: **0.00 [N/A]**

** Multiple Owners live on adjacent parcels to the South & West. Owners use property as a farm and easement traversing property to access homes.

Defined - Adjacent Land Development Pattern

Density, Significantly Different [Ch. 10] – A density which is 50 percent or greater than the surrounding density.





KATHLEEN RESERVE RRD

SECTION 3

**INFRASTRUCTURE
& SDA ANALYSIS**

Polk County GOVERNMENT CENTER ACQUISITION & PUBLIC INVESTMENT CONTEXT

KATHLEEN AREA PUBLIC INFRASTRUCTURE & COMMUNITY RESPONSE - Polk County's acquisition and expansion of the Kathleen Government Center highlight ongoing public investment, suburban growth, and rising infrastructure demands in the Kathleen area and SDA corridor. Discussions on the Government Center expansion included public testimony on area conditions and infrastructure issues such as: Regional flooding and drainage problems; Transportation and roadway capacity; Lack of sidewalks and pedestrian infrastructure; Utility and service expansion needs; and Residential growth pressures.

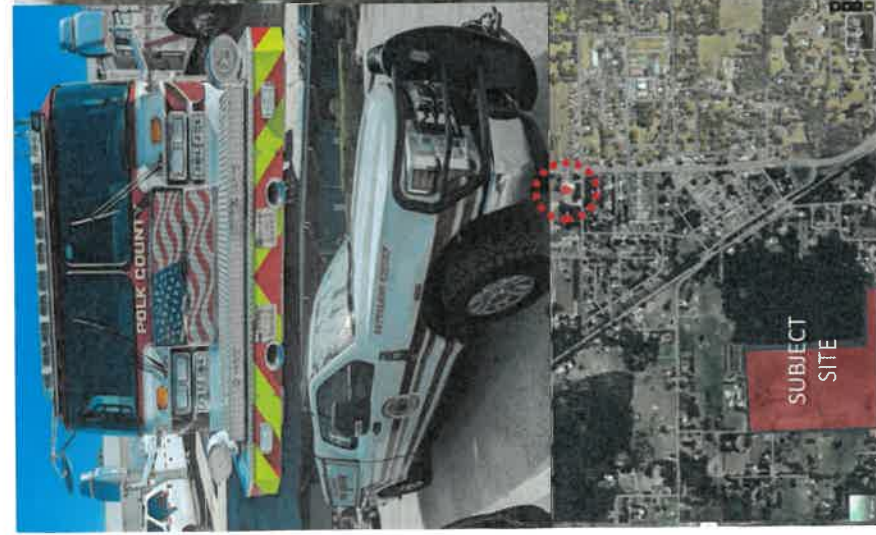
These discussions reflect broader trends of suburban development, infrastructure expansion, and the need for coordinated planning to manage growth, stormwater, and infrastructure efficiency in the SDA. Unlike past fragmented low-density development, the Kathleen Reserve RRD proposes a master-planned framework that: Concentrates development intensity; Preserves wetlands, floodplains, and open spaces; Uses centralized utilities; Incorporates managed stormwater systems; and Provides sensitive transitions to surrounding residential areas.

The Kathleen Reserve RRD preserves about 93.28 acres (61% of the site) as wetlands, floodplain, open space, agricultural/preservation, and stormwater tracts, focusing residential development on upland areas via a clustered RRD design. Public discussions on the Government Center acquisition underscore growing awareness of basin-wide infrastructure, flooding, and land planning challenges in the Kathleen area and the importance of coordinated development and preservation within the SDA framework.



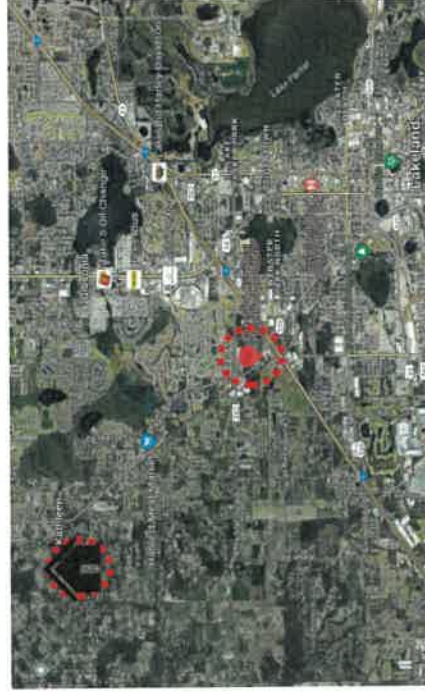
Polk County Fire Rescue provides Advanced Life Support to all residents and visitors. Emergency response is considered effective if response times are within eight (8) minutes in rural and suburban areas and 13 minutes in urban areas.

Fire and EMS responses to this project are from the new Polk County Fire Rescue Station 23, located at 6750 Kathleen Road, Lakeland 33810. The travel distance is approximately 1.8 miles to the entrance subject site and response times are estimated by Polk County Development Services to be three (3) minutes or more depending on the type of call.



Lakeland Regional Health (LRH) built a medical care center that is 5-minutes from the site at I-4 and Kathleen Road.

The new location will help Lakeland Regional Health meet local health needs through the expansion of comprehensive healthcare service with 50 patient care room and 4 surgical rooms. In a recent press release, LRH CEO Danielle Drummond cited US Census data and said, “Polk County is one of the fastest-growing areas in the nation” and “expanding comprehensive healthcare services to meet the local health needs of our area is one of our community objectives”.



Lakeland Regional Health's Kathleen Road facility, which opened on Monday, Nov. 6, 2023. | Kimberly C. Moore. L.kidNow.com

POLK COUNTY UTILITIES EXTENDED ALONG DEESON RD.

Property abuts a **programmed** Utility Investment Project scheduled in the Adopted Comprehensive Investment Program, 2022 – 2026.

Once potable water is extended, the immediate area will have fire protection (hydrants).





Y:28°06'41.95" N X:82°02'26.41" W

POLK COUNTY UTILITIES, FLORIDA
UTILITIES COMMUNITY INVESTMENT PROJECT
100% SUBMITTAL
FEBRUARY 2024

DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS

PARCELS 10, 65, 67, 94, 6000, 6700, 60
 PCI PROJECT #20 U.P. 2400
 WRIGHT PIERCE PROJECT #2113A

WRIGHT-PIERCE
 Engineering & Survey Services
 4444 S.W. 10th Street, Suite 200
 Ft. Lauderdale, FL 33309
 Phone: (954) 575-1000
 Fax: (954) 575-1001
 www.wright-pierce.com

CONTRACTOR
 DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS
 PROJECT #20 U.P. 2400
 WRIGHT PIERCE PROJECT #2113A

DATE: 02/15/24

SCALE: AS SHOWN

PROJECT: DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS
 WRIGHT PIERCE PROJECT #2113A

CONTRACTOR: DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS
 WRIGHT PIERCE PROJECT #2113A

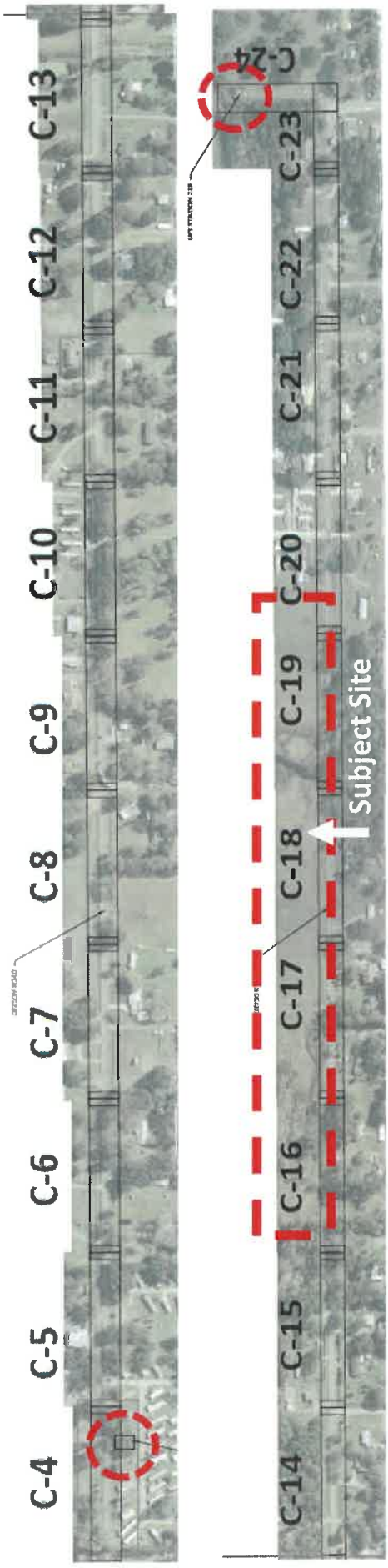
DATE: 02/15/24

SCALE: AS SHOWN

PROJECT: DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS
 WRIGHT PIERCE PROJECT #2113A

CONTRACTOR: DEESON ROAD LIFT STATION AND FORCE MAIN IMPROVEMENTS
 WRIGHT PIERCE PROJECT #2113A

POLK COUNTY WILL HAVE TWO PUBLIC LIFT STATIONS ON EITHER SIDE OF DEESON ROAD. THE SUBJECT SITE WILL BE CENTERED BETWEEN BOTH PUBLIC LIFT STATIONS.



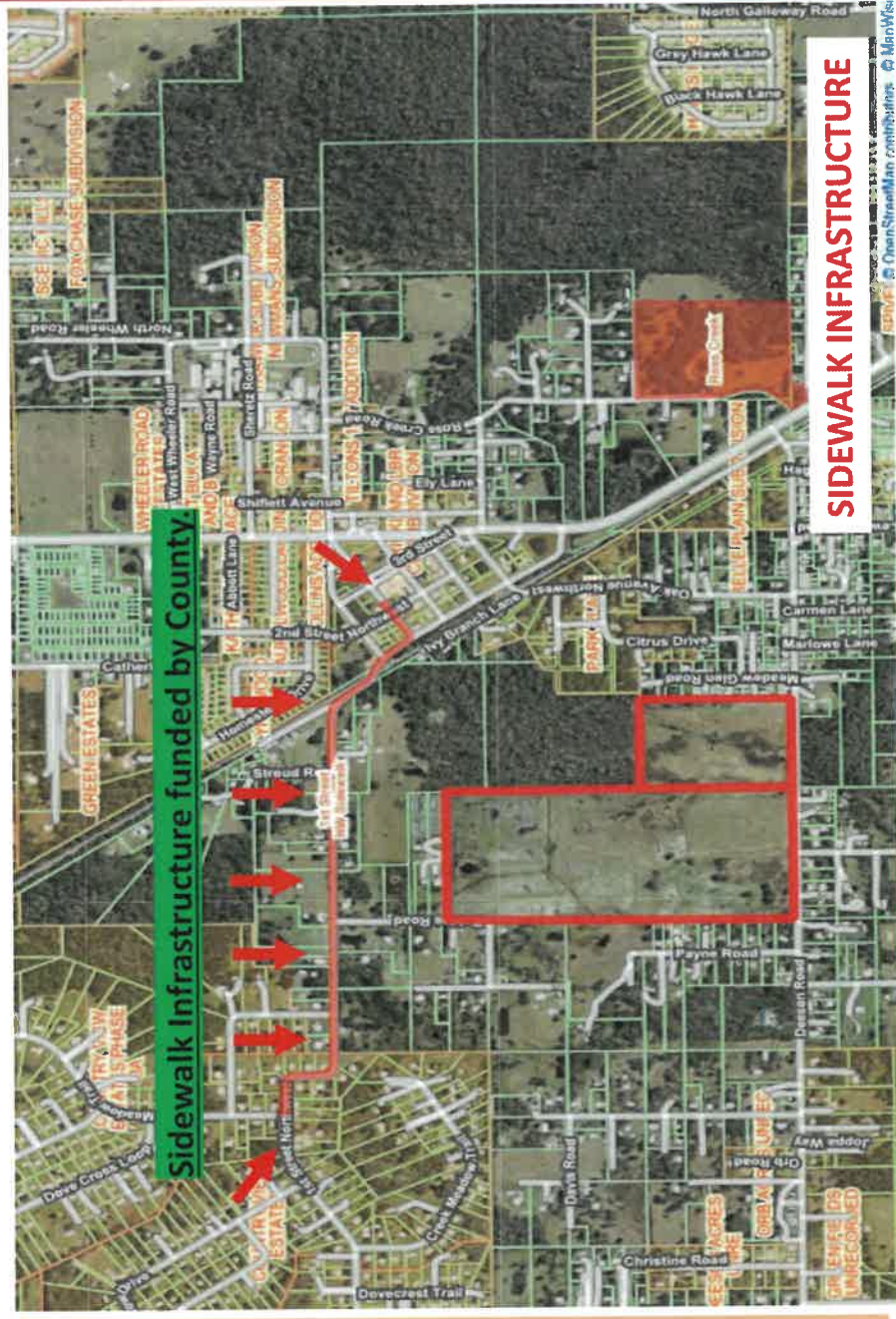
POLK COUNTY SIDEWALK INFRASTRUCTRE BEING BUILT

Property is due south (walking distance) from a **programmed** sidewalk Infrastructure Investment that is under construction.

The sidewalk segment will connect Kathleen's Historic Main Street Village with a high-density subdivision in the A/RR district known as Country View Estates.

The need for sidewalks on 1st Street NW resulted from two pedestrian fatalities in 2022 occurring on either side of Robbins Road.

There is a real need for private investment to unify disconnected and fragmented public investments like this Capital Improvement Project. This is a \$1.5 Million Public Investment.



SIDEWALK INFRASTRUCTURE

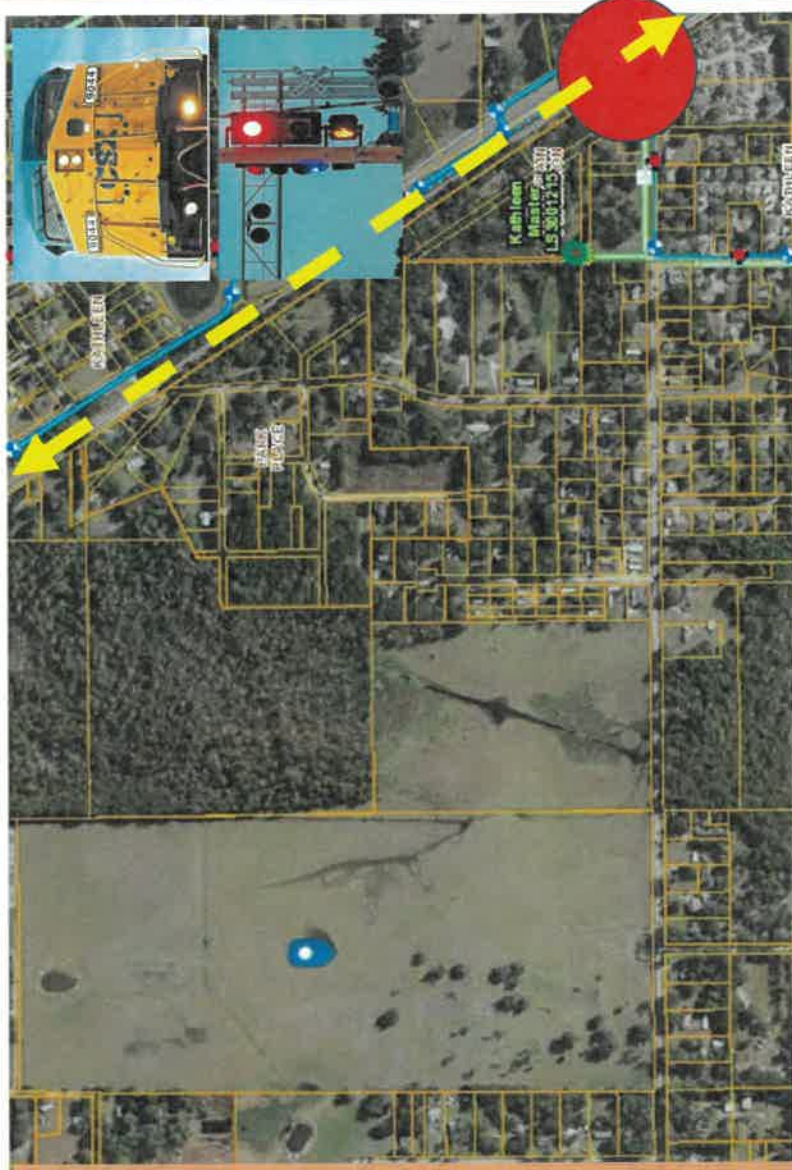
OpenStreetMap contributors © Mapbox

1. KATHLEEN AREA CSX RAIL LINE IMPROVEMENTS

2. NEW TRAFFIC LIGHT AT DEESON RD/KATHLEEN RD INTERSECTION

In 2023, the CSX rail line underwent improvements in the 13 intersections of the Kathleen area, including Deeson Road. Rail line improvements included signalization, pedestrian crossings and rail line upgrades. The purpose of modernizing the CSX rail line is to improve efficiency and safety in areas with projected higher density development patterns.

Due to high traffic trip generation caused by more intensive, higher density development patterns, there was a need for a traffic light (per Polk County) at the intersection of Deeson Rd and Kathleen Rd. Polk County has funded and is in the process of installing a new traffic light.



KATHLEEN AREA ROADWAY IMPROVEMENTS INCLUDES NEW TURN LANES AND NEW STORM PONDS TO IMPROVE DRAINAGE & MAKE WAY FOR NEW DEVELOPMENT.

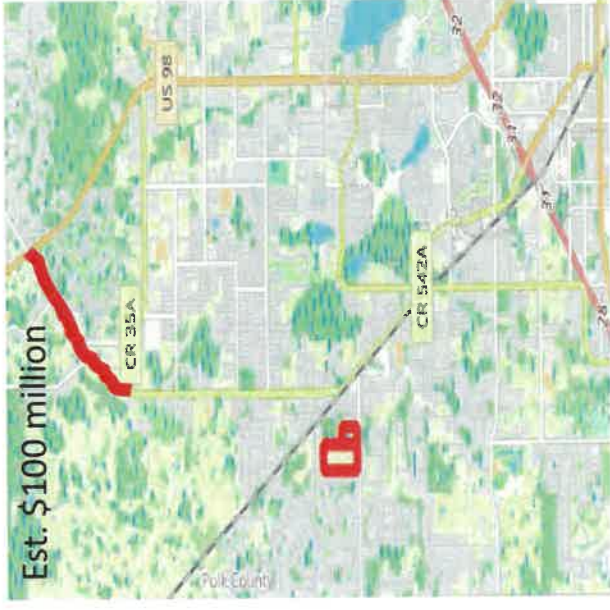


Kathleen Road widened to four (4) lane divided principal road. Kathleen Road is scheduled to be widened in the near future extending the road from Duff Road to US 98.



Work on widening Kathleen Road from Galloway Road to Duff Road was approximately \$52 million in cost. The intent of the project was to relieve traffic congestion for commuters traveling to and from Lakeland's northern suburbs.

The three-mile project came after the widening of a 2.4-mile section of Kathleen Road from Interstate 4 to Galloway Road, which was completed in 2007. The Galloway Road to Duff Road portion was completed by August 2013.



LAUREL M. LEE
 U.S. HOUSE OF REPRESENTATIVES
 COMMITTEE ON APPROPRIATIONS
 POLK COUNTY DISTRICT 11
 WASHINGTON, DC 20515-0015

March 31, 2023
 The Honorable Kay Granger
 Chairman
 House Committee on Appropriations
 1036 Longworth HOB
 Washington, D.C. 20515

Dear Chairwoman Granger and Ranking Member Delamin,
 I am requesting funding for the Kathleen Road Widening Project in fiscal year 2024. The entity to receive funding for this project is Polk County Government, located at 1036 Longworth HOB, Washington, D.C. 20515. The funding would be used for the widening and extension of the Kathleen Road.

The project is an appropriate use of taxpayer funds because it would create more capacity for the movement of commerce in Polk County by moving local traffic to an alternate roadway. This would promote economic growth by improving the regional supply chain.

The project has a federal nexus because the funding provided is for purposes described in 42 U.S.C. 3305(b)(2).

I certify that I have no financial interest in this project, and neither does anyone in my immediate family.

Sincerely,
 Laurel M. Lee
 Member of Congress

Kathleen Rd Widening and Extension Project Summary:
 Due to congestion on U.S. Hwy 98 and increasing development in the north Lakeland/Kathleen area, Polk County needs and is planning for a parallel roadway to U.S. Hwy 98 to move traffic north and south. The County and its transportation partners have determined that Kathleen Rd needs to be widened and extended. This project will reduce congestion on an already failing roadway.

The county is already looking at intersection improvements and widening Kathleen Road north of Duff Road to add a roundabout at the Campbell Road intersection. The current thinking is the future four-lane extension of Kathleen Road would go to Rockridge Road and then onto U.S. 98. That widening and extension project would take an estimated \$100 million, and it could take more than eight years before cars and trucks will be able to drive it. And that's if the funding is approved sooner rather than later.



KATHLEEN RESERVE RRD

SECTION 4

COMP PLAN / DRC FINDINGS

Comprehensive Plan Amendment (CPA)

- CPA (LDCPAL 2021-17) on the 90-acre parcel of Meadowbrook adopted on 04/05/2022.

- DRC Recommendation: **APPROVAL**

- Planning Commission Recommendation: **UNANIMOUS APPROVAL**

- County Commissioners Vote:

- Transmittal: **UNANIMOUS APPROVAL**
- Adoption: **UNANIMOUS APPROVAL**

Request:	Future Land Use designation change from Agricultural/Residential-Rural (A/RR) in the Rural Development Area (RDA) to Residential-Suburban (RS) in the Suburban Development Area (SDA).
Location:	Located on the north side of Deeson Road, west of Karthleen Road, east of Payne Road and south of 1 st Street NW, Lakeland, in Section 20, Township 27, Range 23
Property Owner:	LBF Ranch, LLC
Parcel Size:	90.57 +/- acres (232720-000000-032050)
Development Area/Overlays:	Rural Development Area (RDA)
Nearest Municipality:	Lakeland
DRC Recommendation:	Approval
Planning Commission Vote:	Recommended Approval 12-1-2021 Vote: 6:0
Public Comment:	None
DEO Recommendation:	None (DEO No. 22-01-ESR) Department of Economic Opportunity



PROPOSED FUTURE LAND USE MAP
RESIDENTIAL SUBURBAN (RS)



PROPOSED DEVELOPMENT AREA
SUBURBAN DEVELOPMENT AREA (SDA)

Deeson Road Comprehensive Plan Amendment [CPA]

“Is **COMPATIBLE** with surrounding land uses and general character of the area.”

“Is **CONSISTENT** with the Polk County Comprehensive Plan and the Land Development Code.”

- Polk County Development Services

Development Review Committee (DRC) statements on the approved/adopted Comprehensive Plan Amendment (CPA) for the Property which was unanimously approved by the Polk BOCC:

Urban Sprawl Analysis

“After Analyzing the primary indicators of Urban Sprawl per Policy 2.109-A10 of the Polk County Comprehensive Plan, **it is apparent that the proposed request is not considered urban sprawl based on these criteria as this is a mapping error of a land use and it is permitted in the designated area.** Table 9 depicts the Urban Sprawl Criteria used by staff as indicators of Urban Sprawl.”

- Polk County Development Services

Development Review Committee (DRC) statements on the approved/adopted Comprehensive Plan Amendment (CPA) for the Property which was unanimously approved by the Polk

BOCC:

" ... not anticipated to degrade the Level-of-Service (LOS) standard for transportation, the locally zoned schools, fire, EMS, and sheriff public safety resources."

"The subject site will connect to the County's water and wastewater through the Polk County NW Regional Utility Service Area."

Development Review Committee – Key Findings:

- "The applicant has demonstrated that this development is not premature in the SDA. The project will connect to centralized potable water and wastewater".

Policy 2.102-A1: Development Location.

- "... surrounded by a residential land use district. There are residential subdivisions, residential lots and residential land use districts located adjacent to the subject site".

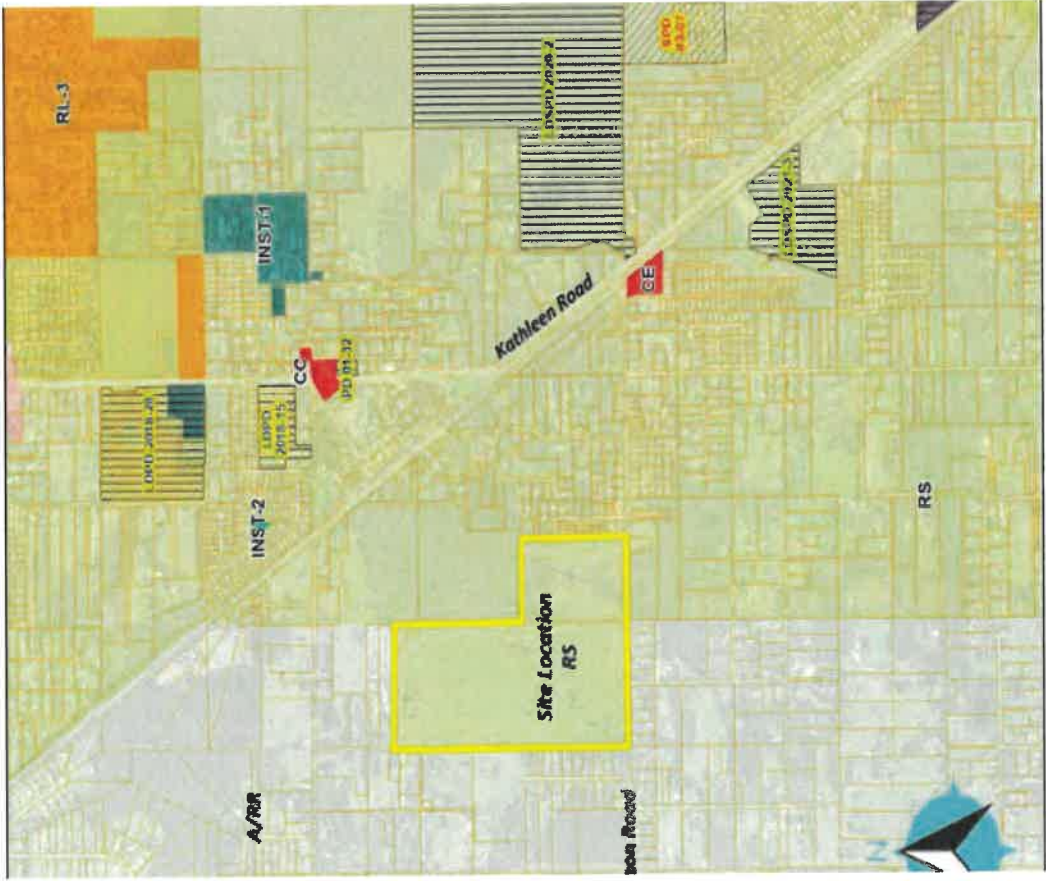
Policy 2.102-A2: Compatibility.

- "The proposed development is in an area of the County that contains public utilities and community services which exceed what is typically found in the Suburban Development Area (SDA)".

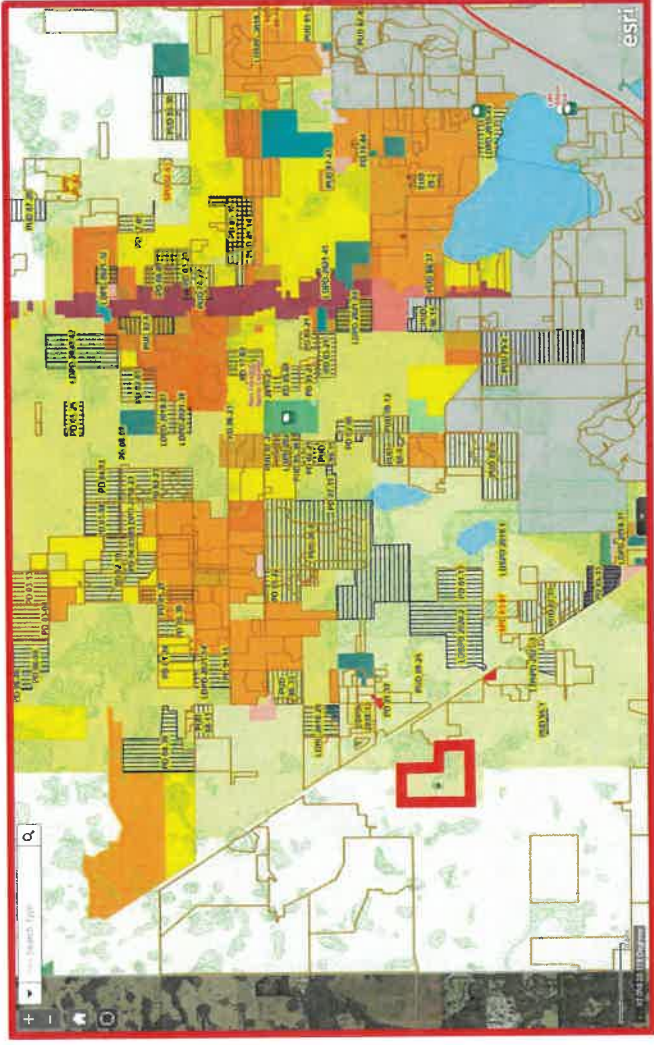
Policy 2.102-A3: Distribution.

- "... located within an area that has significant amount of urban infrastructure and services with ample capacity to serve it".

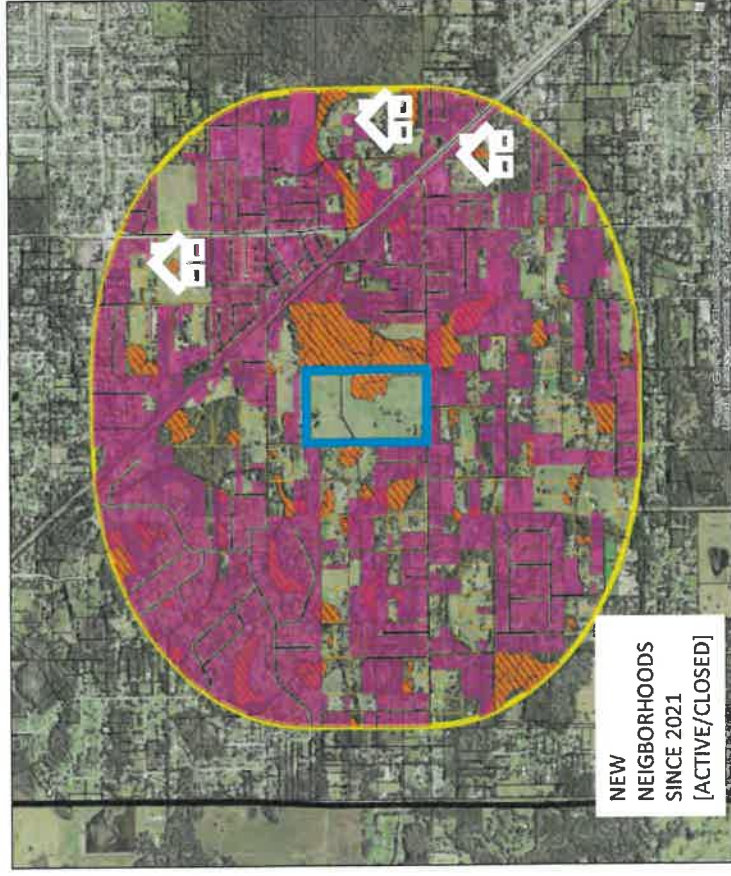
Policy 2.102-A4: Timing



Residential Suburban (RS) – The purpose of the RS district is to provide areas for suburban-density residential development to promote the proper transition of land from rural to urban areas. The RS district permits single-family dwelling units, family care homes, agricultural support uses, and community facilities.



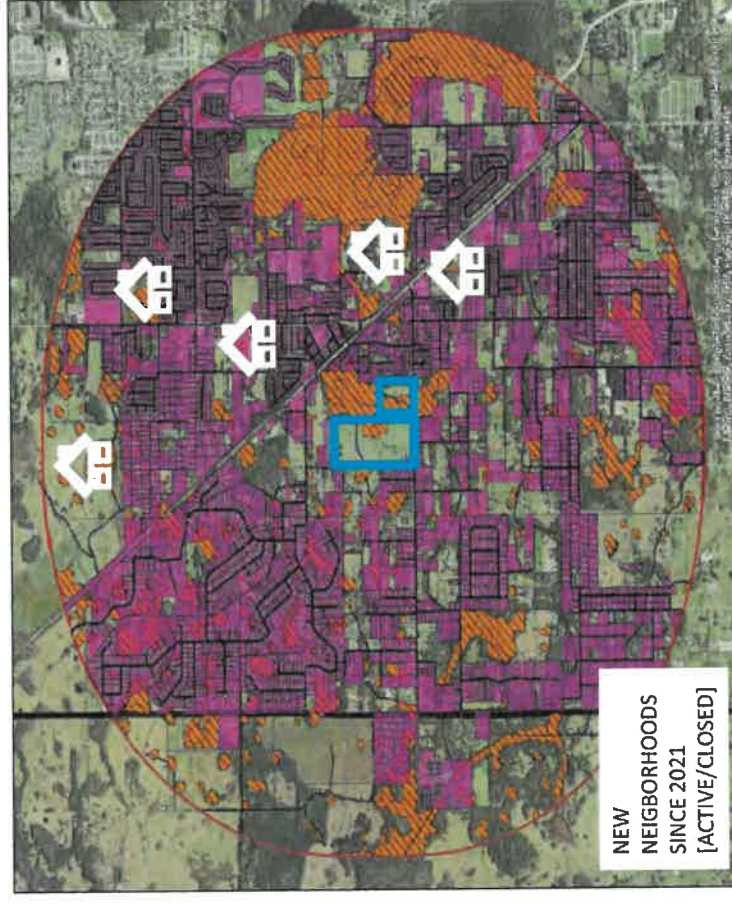
1-Mile Dev. Ratio Test



CPA Requirement: Above 40% Developed

Ratio Results: 68% Developed [2021]

2-Mile Dev. Ratio Test



CPA Requirement: Above 60% Developed

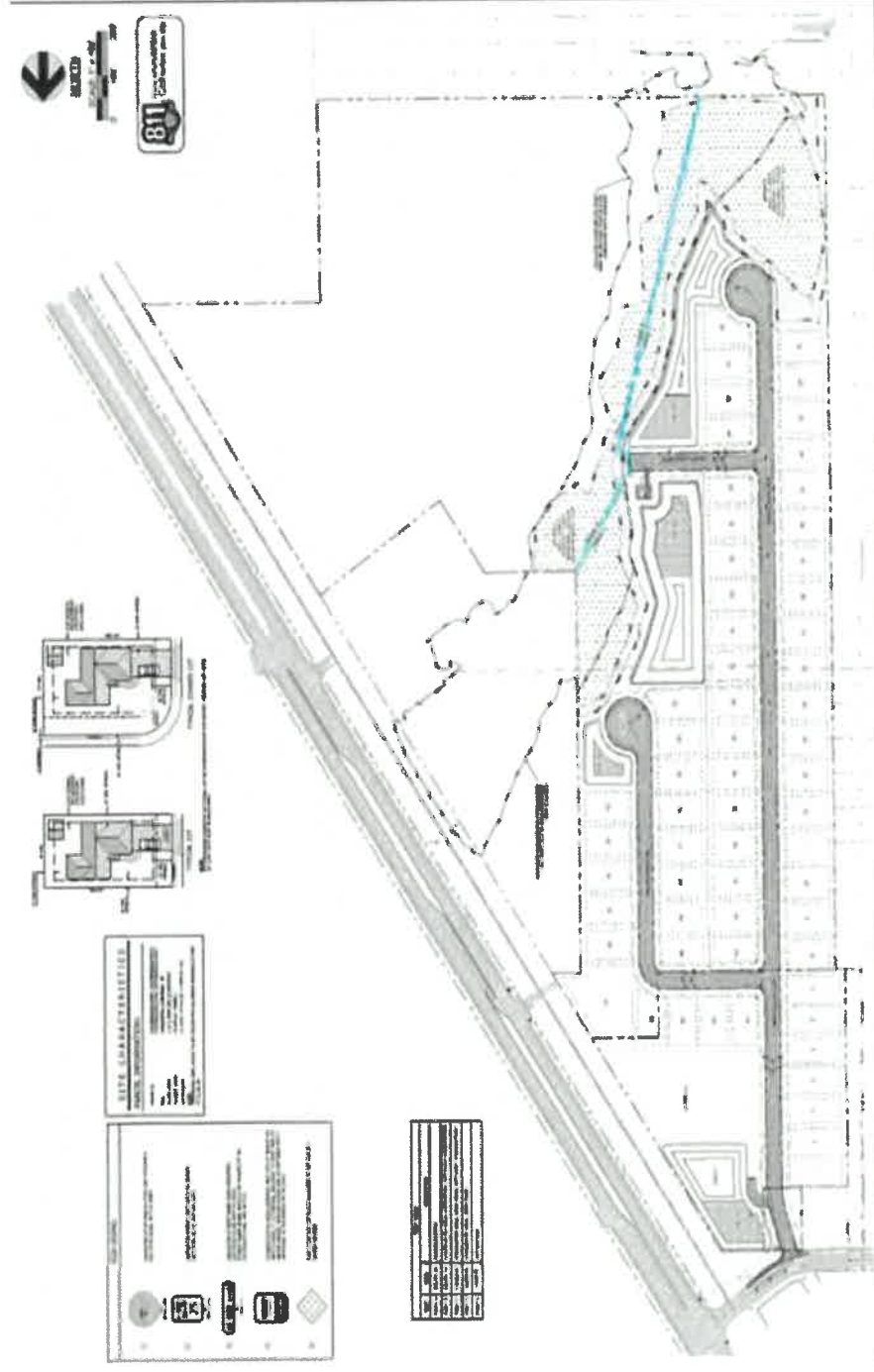
Ratio Results: 62% Developed [2021]

1-Mile Comparables – Nearby New Home Communities



No.	Project Name	Case No.	Approval	Density	Open Space	Distance
1	Baker Road SPD (aka Willow Ridge)	LDDP-2018-28	09/03/18	4.24	20%	3,572 Ft.
2	Laurelwood Lane [RID/SPD]	LDPD- 2018-18	08/15/18	2.61	20%	3,400 Ft.
3	Ross Creek SPD	LDSPD-2020-2	09/15/20	1.95	60%	3,300 Ft.
4	Knights Landing [RID/SPD]	LDSPD-2021-3	11/3/21	2.99	35.2%	2,500 Ft.
5	PRIOR – Meadowbrook SPD no. 1	LDSPD- 2022-1	Denied	2.56	55%	SUBJECT SITE
6	PRIOR – Meadowbrook SPD no. 2	LDSPD- 2023-1	Denied	1.51	69.6%	SUBJECT SITE
	Kathleen, 1-Mile Development Ratio				32%	
	Kathleen, 2-Mile Development Ratio				38%	

KNIGHTS LANDING [RID] SUBDIVISION CONTAINS THE SAME INFRASTRUCTURE LEVEL OF SERVICE THAT ARE AVAILABLE AT THE SUBJECT SITE. THERE ARE 3 PHASES OF KNIGHTS LANDING. PHASE II IS ACTIVELY GOING THROUGH A RESIDENTIAL INFILL REQUEST DUE TO THE RESISTANCE OF LOCAL RESIDENTS TO APPROVE THE PROJECT THROUGH A LEVEL 3 PLAN REVIEW PROCESS.



- RS land use
- 33.2± acres (57.7 acres)
- 61 lots (107 lots)
- Density Provided
 - 1.83 du/ac
- Density Allowed w/ SPD
 - 3.0 du/ac
- Min. lot size provided:
 - 11,850 sq.ft
- Min. lot size allowed:
 - 11,761.20 sq.ft.
- Infrastructure LOS Met
 - Sewer not required
 - Water under 70%
 - Fire w/in 1 mile (3)
 - EMS w/in mile 3 miles (5)
 - Schools ≤ 100%
 - Roads less than LOS D



- Side One (Smallest)
 - 0.23 acres
 - 10,018.8 sq.ft.

- Side Two (Largest)
 - 0.31 acres
 - 13,503.6 sq.ft.

- Average of two
 - 0.27 acres
 - 11,761.2 sq.ft.

Land Development Division
 330 W. Church Street
 Bartow, FL 33830



Application Comment Report
Application Number: LDRES-2024-20

Report Date: 04/29/2024

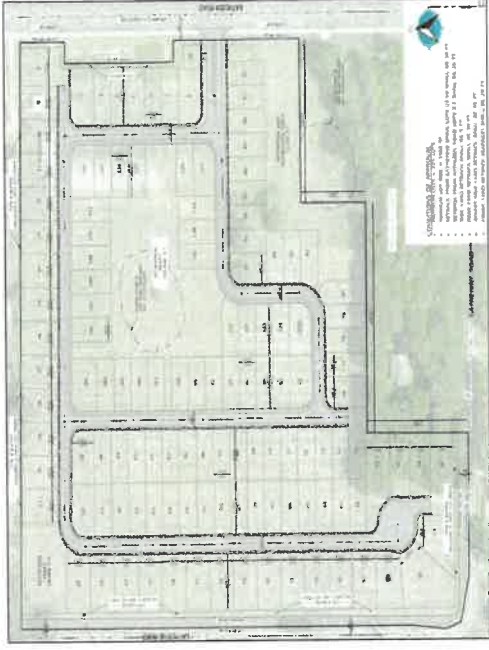
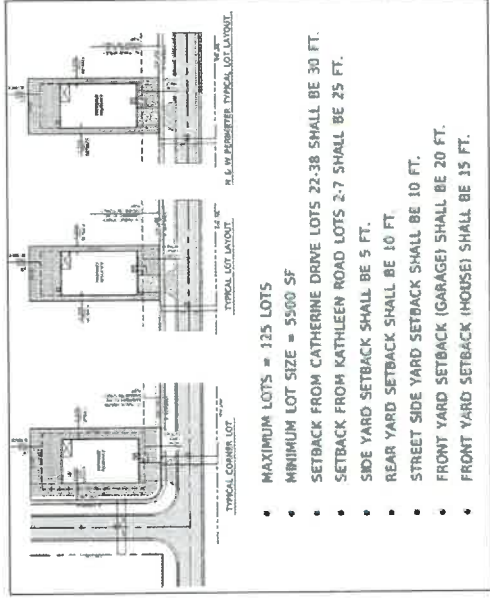
Description: The developer is proposing Phase 2 of the Knights Landing development which will consist of 70-lot single family lots with site & storm water improvements, located in Lakeland, FL off of Deeson Road. The project area totals 23.6 acres and is located within the jurisdictional limits of the Polk County. The project's parcel id number is 23-27-28-011021-000610.

Address: 0 KNIGHTS LANDING DR, LAKELAND, FL, 33810

Record Type: DRC-Residential Site Review

Reviewer Contact Information:

Reviewer Name	Reviewer Email	Reviewer Phone
Steve McQuaig	steve.mcquai@polk-county.net	-
Karen Murphy	KarenMurphy@polk-county.net	863-298-4228
Diane Miller	dianemiller@polk-county.net	-
Mark Bennett	markbennett@polk-county.net	863-534-6455
School District	planning@polk-fl.net	8635340620
Richard K. Benton	richardkbenton@polk-county.net	863-534-6765
Kim Turner	kimturner@polk-county.net	-

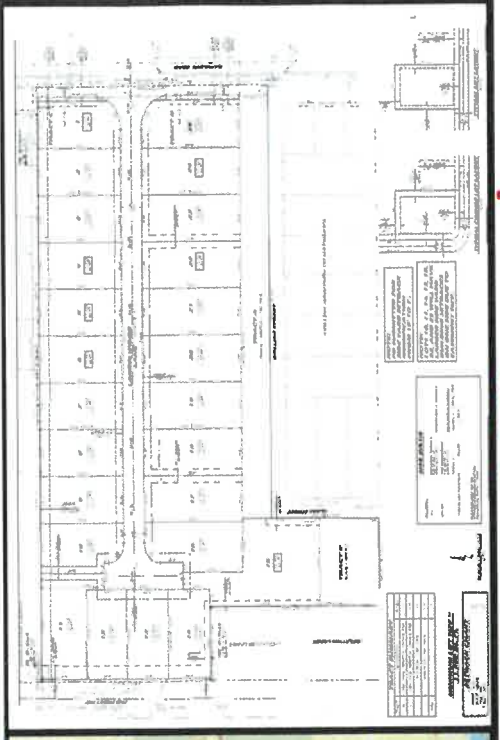
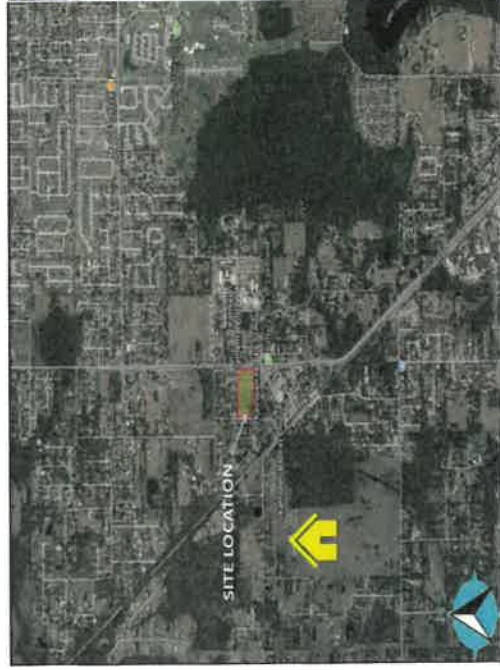


BAKER ROAD [KNOWN AS WILLOW RIDGE]

Summary of Analysis:

On May 21, 2019, the BOCC has two days of public testimony for a DeNovo Hearing for LDPD-2018-28. At the time, this allowed the applicant an opportunity to address issues and concerns relayed by citizens at the hearing regarding the compatibility of this project to surrounding development. The applicant submitted a new site plan that reduced the number of lots from 137 to 125 units (4.24 dwelling units/acre). Perimeter lots were set to 70 feet wide (50 feet for internal lots), and a “Type B” landscaping buffer was constructed along the northern property with a six-foot PVC fence to address compatibility issues. Additional right-of-way along for Catherine Drive (40 feet from the centerline of pavement) were dedicated.

The Planned Development (PD) for a 125-lot single-family residential subdivision had a density of 4.24 dwelling units/acre. To reach this density, the achieved (9) nine density bonus points as described in Table 3.3 of the Land Development Code. The Meadowbrook SPD in its last iteration for 147-lot single-family residential subdivision had a density of 1.51 dwelling units/acre. The Meadowbrook SPD achieved (34) thirty-four density bonus points. Meadowbrook is less than 1-mile away.



LAURELWOOD LANE RID/SPD

Summary of Analysis:

The above Planned Development (PD) for 25 single-family lots on 9.56 +/- acres had a density of 2.61 du/ac. The project was located within the Residential Suburban (RS) and the Suburban Development Area (SDA) just like Meadowbrook. This project was undergoing a Level 2 Review for Residential Infill Development [RID] until issues arose with side setbacks which prompted the Level 3 Review. The site plan dedicates additional right-of-way to what is presently available; however, this dedication encroaches into the requisite setbacks for structures along an Urban Collector road such as Kathleen Road. The site plan also called for a wall to be constructed between Lots 1 & 25 and Kathleen Road.

The request was also deemed compatible with the surrounding neighborhood. As noted above, this project was being reviewed for Residential Infill Development. Though in a RS district, the lot sizes for this project and within surrounding neighborhoods are smaller than the minimum five-acre residential lot sizes as mandated by Table 2.2 of the Land Development Code. For this reason, the request was for a PD rather than a Suburban Planned Development (SPD). The development did not need the density reduction of the SPD process because it met Residential Infill criteria.

SITE DATA

PARCEL INFORMATION

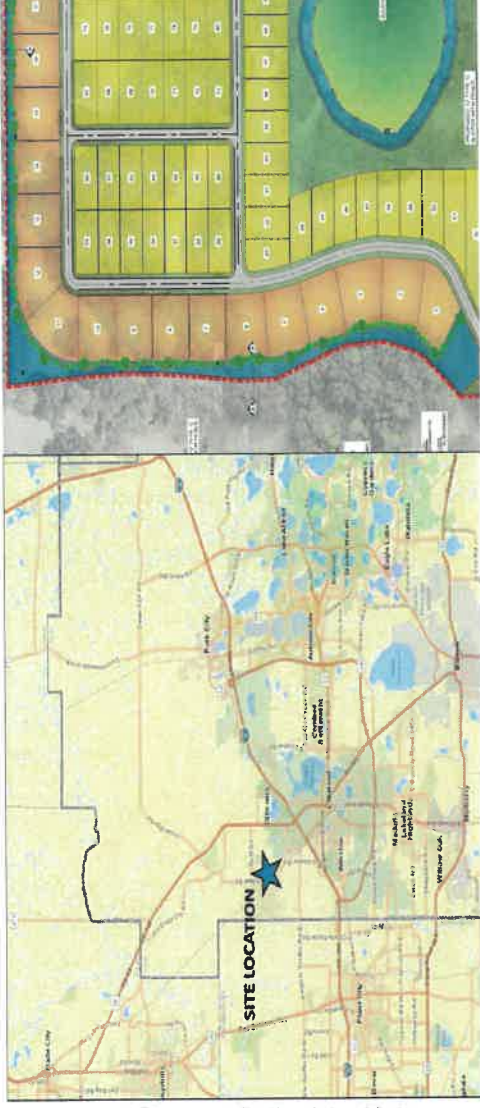
PARCEL ID: 232721-000000-023000

DEVELOPMENT INFORMATION

PROJECT AREA: ±120 ACRES
WETLAND PRESERVATION AREA: ±72 ACRES
PROPOSED USE: SINGLE FAMILY RESIDENTIAL
DWELLING UNITS: 94 LOT
DENSITY: 0.78 DU/AC
SETBACKS: SEE TYPICAL LOT

UTILITIES

WATER/SEWER: POLK COUNTY
UTILITIES: UNDERGROUND



ROSS CREEK

Summary of Analysis:

Similar proposed projects on this site - LDSPD-2018-2 and LDSPD-2018-4 with 139 units and 100 units, respectively – were rejected after DeNovo Hearings. LDSPD-2019-3 (94 units) was denied 5:1 by the Planning Commission during a public hearing held on January 8, 2020. LDSPD-2020-2 was eventually approved with the above site plan and was challenged in court by members of the public. The BOCC decision was upheld after years of litigation.

The project featured a 10-foot-wide Type “C” landscaping buffer with an eight-foot opaque fence. The breakdown of the number of lots were 1) 73, 60’ x 120’ lots and, 2) 21, 100’ x 135’ lots. The density for the site is detailed as 0.78 du/ac but that was based on gross acreage with wetland preservation area. This has since changed and the qualified density for the site is 1.94 du/ac which is based on 48 upland acres. The Meadowbrook SPD in its last iteration for 147-lot single-family residential subdivision had a density of 1.51 dwelling units/acre. The Meadowbrook SPD achieved (34) thirty-four density bonus points. Meadowbrook is less than 1-mile away.

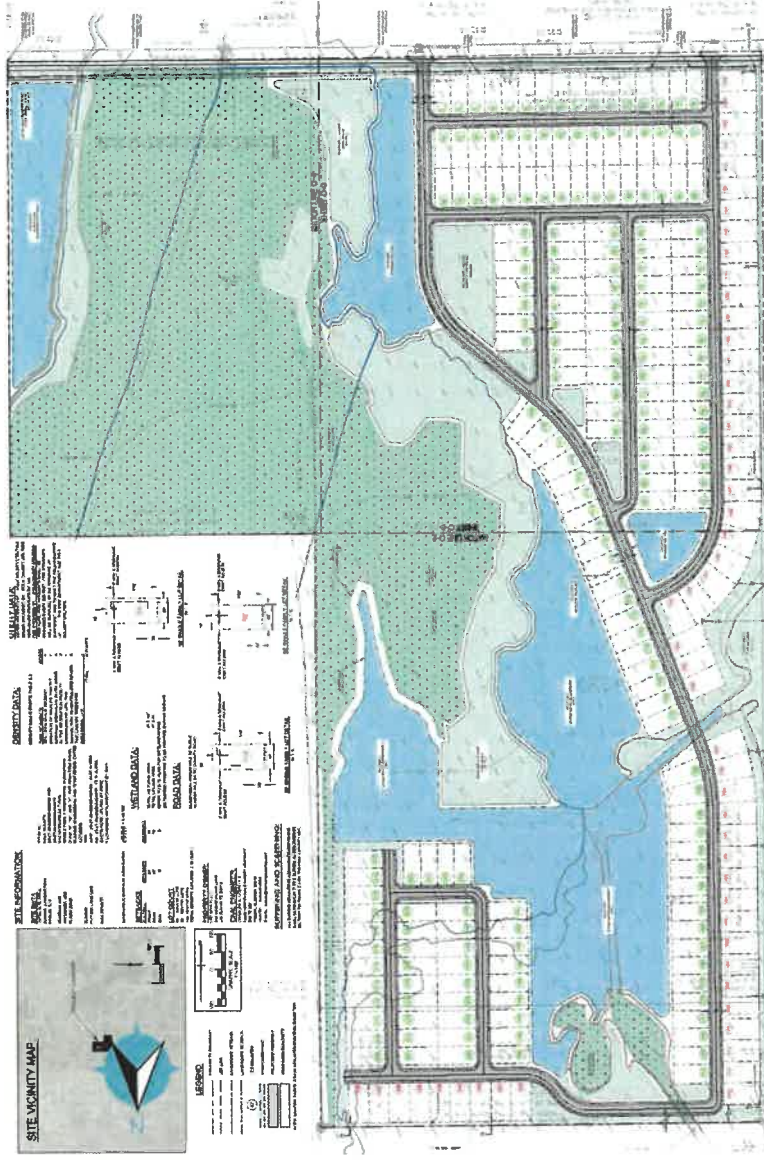


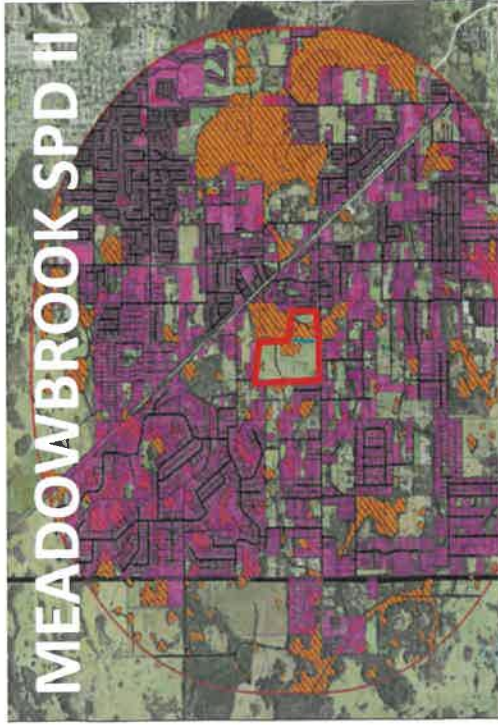
MEADOWBROOK SPD I

Summary of Analysis:

This Suburban Planned Development (SPD) was for 242 single-family lots within a Residential Suburban (RS) Future Land Use district in a Suburban Development Area (SDA). There was 97.3 acres as estimated to be upland areas with 21.5 acres of wetlands. The gross density for this project was approximately 2.49 dwelling units per upland acre (DU/AC). The minimum lot size will be reduced to 5,500 sq. ft. Side principal structure setbacks will be reduced to five (5) feet, and rear detached accessory structure setbacks will be reduced to five (5) feet. The setback from the Deeson Road right-of-way will be reduced to 20 feet after the dedication of right-of-way.

It is the last of its size along Deeson Road that can be developed for residential purposes. Through LDCPAL-2021-17, Parcel #232720-000000-032050 (+/- 90.57 acres) was changed from an Agricultural/Residential Rural (A/RR) land use district and Rural Development Area (RDA) to RS and SDA by the BoCC on April 5, 2022. On November 17, 1987, the Board granted Concept and Tentative Approval with conditions of Planned Unit Development 87-35 (PUD 87-35) on the subject site for a 256-unit manufactured home subdivision with a gross density of 2.52 units per acre. PUD 87-35 has expired and is no longer valid.





Summary Analysis:

The denied SPD was approximately 49.7% of the units that could be permitted onsite through the LDC and Comprehensive Plan. The submitted site plan demonstrated approximately 69.5% open space or 67.66 acres, which did not include wetlands. Of this amount, landscaped and curvilinear stormwater ponds accounted for 8.03 acres; 20.79 acres will be for remaining pasture to the north of the homes; and 26.17 acres will be dedicated towards wetland buffers and 25-foot-wide landscaping buffers. The balance were to be utilized for amenities, which include a community center and park areas. Internal sidewalks were to connect the lots to these recreation areas.

While the minimum lot size proposed at 5,750 sq. ft., the project showed a mixture of lot sizes arranged to lessen the impact on neighbors. The site plan calls out 60 x 115' (6,900 sq. ft.) lots along the western and southern property lines, closest to existing residences. To the west, these 60-foot-wide lots abutted nine (9) residential properties with a mixture of site-built and mobile homes on 100-foot-wide and 130-foot-wide lots approaching one (1) acre on the east side of Payne Road. These lots are within the unrecorded LE Mercers subdivision and a few of these had multiple dwelling units. Aerial photographs show this neighborhood under construction in 1964. These lots predate any zoning or County development standards. The proposed 60-foot-wide lots present a transition between these lots with a lot-width ratio of slightly over 2:1 (proposed lots versus existing lots). A 25-foot-wide landscaping buffer was proposed along this property line, which, along with the 15-foot-setback, provide 40 feet of relief from the back of proposed structures to the neighboring property line. Homes on un-platted parcels to the north of the subject site will be buffered from the proposed development by over 20 acres of pasture. These properties range in acreage from approximately one acre to around five acres. No access is proposed on Robbins Road. This all speaks to the appropriate timing of this development in the area, and Section 303 of the LDC requires that the timing of SPDs shall be considered appropriate where the existing development of the surrounding area is sixty percent or greater – the surrounding developable area within 2-miles equated to 62% developed and 38% open space.



KATHLEEN RESERVE RRD

SECTION 5

HIGHER DENSITY /
HIGHER INTENSITY
EXAMPLES IN
AREA

LOCATED ON DEESON ROAD, THIS MOBILE HOME RELIGIOUS COMPOUND CONTAINS A COMPACT, HIGH DENSITY DEVELOPMENT PATTERN LESS THAN 1.5-MILES AWAY FROM THE SUBJECT SITE.

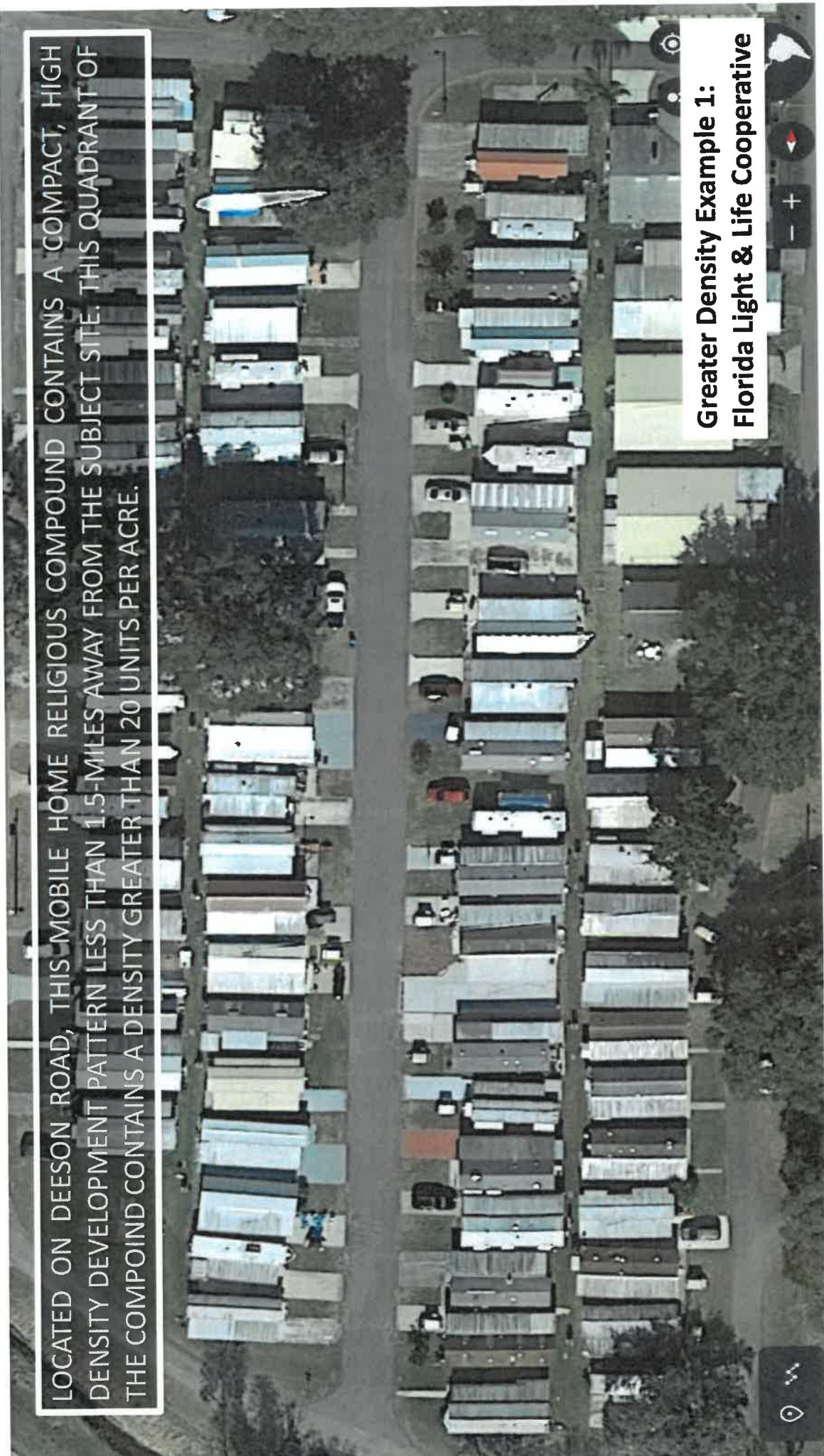


3.43 Acres
76 Mobile Homes
22 DU/AC

**Greater Density Example 1:
Florida Light & Life Cooperative
3 > 6 DU/AC IN THE A/RR**

LOCATED ON DEESON ROAD, THIS MOBILE HOME RELIGIOUS COMPOUND CONTAINS A COMPACT, HIGH DENSITY DEVELOPMENT PATTERN LESS THAN 1.5-MILES AWAY FROM THE SUBJECT SITE. THIS QUADRANT OF THE COMPOUND CONTAINS A DENSITY GREATER THAN 20 UNITS PER ACRE.

**Greater Density Example 1:
Florida Light & Life Cooperative**





**Greater Intensity Example 2: 8.29 Acres
APPROVED Assisted Living Facility
60 beds, 16 Ind. Living Units, 5000 SF in Office**

Greater Density Example 3: Briarwood Mobile Park 2 > 5 DU/AC IN THE A/R/R



Site Address:	5310 DEESON RD ANCLAGE, FL 32811
County:	POLK
Land Sale:	3-00 2005 10-10
Parcel ID:	222300000000000000
Zone:	PIRE
Area:	14.37
Land Use:	Parking Lots Mobile Home Park
Zoning:	
Latitude/Longitude:	28.111921 -86.052258
Parcel:	
Property Details:	
More Property Details:	
Full Property Profile:	
Google Street View:	
3D Map:	
Print Map:	
Google Maps:	

Weathers 2019	
Description:	2019 Medium Density, 2.5 dwelling units/acre
Description 2:	1,200 Medium Density, 2.5 dw/acre
Level:	1,000
Level 2:	200
Model:	GWV 2017

FEMA DERM	
Flood Zone:	AC
Description:	10-YEAR FLOOD-AM
Risk Level:	HIGH RISK AREA
SPR:	INSIDE SPECIAL FLOOD HAZARD AREA

**Example 4:
Cruz Mobile Park
2 > 5 DU/AC in the A/RR**

Parcels	
Owner Name:	CRUZ FEDCO
Site Address:	1815 DEESON RD LAKELAND, FL 33610
County:	POLK
Last Sale:	\$200,100 2013-07-22
APN:	232719300000020010
ALTERNATIVE:	
Area:	5.31
Land Use:	Parking Lots, Mobile Home Park
Zoning:	
Est. Long 3 Months:	28.113402, -82.045573
Click:	Property Details More Property Details Print More Property Details Google StreetView Birds Eye Google Map / Directions
Wetlands 2019	
Description:	1200 Medium Density 3-5 dwelling units/acre
Description 2:	1200 Medium Density 2-5 dwelling units/acre
Level 1:	1000
Level 2:	1300
WMD:	SWF 2017



DEESON RD

High Density Example 5: Country View 2>5 DU/AC in the A/RR



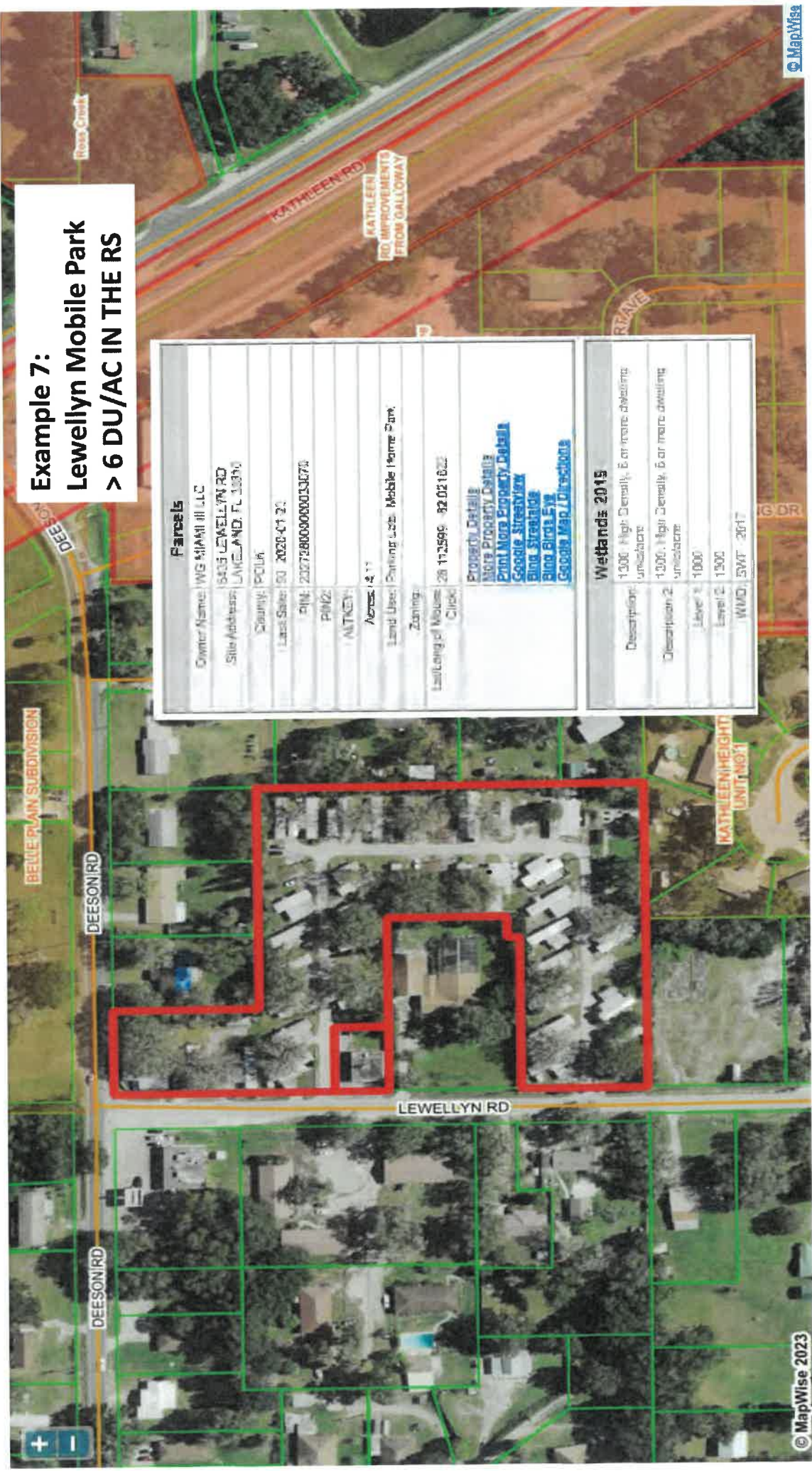
Permittee: Country View Partnership Project Name: Country View Estates Project Address: 545 E Application #: 22783 Permit #: 1040 System Type: NGSW INDIVIDUAL PERMIT Permit Status: Approved Application Date: 1/26/03-14 Appl. Decision Date: 1/26/03-02 Expire Date: 1/26/09-02 Permit Details	
Wetlands 2019 Description: 1200 Medium Density, 2-5 dwelling units/acre Description 2: 1200 Medium Density, 2-5 dwelling units/acre Level 1: 100E Level 2: 120E WMO: SVF 2017	
Future Land Use FLU Code: A/RR FLU Code 2: Description: Agriculture/Residential Rural Generalized Code: A3 Jurisdiction: UNINCORPORATED County: POLK Notes: Rural Development Area DCA Number: Estimated Description: POLICY 2.109.04: The purpose of the A/RR (Agriculture/Rural) land use district is to provide lands for the continuation of productive agricultural uses and for compatible residential development. A/RR districts permits agricultural activities, agricultural support facilities, single family dwelling units, farm labor housing, group living facilities, and community facilities.	

**Example 6:
Meadow Glen
> 5 DU/AC in the RS**



**Example 7:
Lewellyn Mobile Park
> 6 DU/AC IN THE RS**

Parcels	
Owner Name:	WG MIAMI III LLC
Site Address:	5439 LEWELLYN RD LAKELAND, FL 33500
County:	POLK
Last Sale:	50 2020-01-20
PLN:	202738000000033670
PLM2:	
ALTY:	
Acres:	14.11
Land Use:	Drivng Lcb. Mobile Home Park
zoning:	
Building of Value:	26 112599 02 02 1622
Click:	
Property Details More Property Details Print Map Property Details Google Streets View Aerial Streets View Satellite Map / Directions	
Wetlands 2015	
Description:	1000: High Density, 6 or more dwelling units/acre
Description 2:	1000: High Density, 6 or more dwelling units/acre
Level 1:	1000
Level 2:	1000
WWD:	EWT - 2017



EXECUTIVE LEVEL PRE-HEARING SUBMITTAL

*Kathleen Reserve / Deeson Road RRD
Case LDPD-2026-6 | Polk County, Florida*

Prepared for submittal to Polk County prior to public hearing
Prepared by Plan Florida LLC | June 3rd, 2026

Transmittal Statement

On behalf of the Applicant, this memorandum is respectfully submitted for inclusion in the public record for the Kathleen Reserve / Deeson Road Rural Residential Development, Case LDPD-2026-6. The Applicant requests approval of the RRD subject to clear, enforceable conditions addressing the issues customarily reviewed in the County development process, including compatibility, density, traffic, stormwater, utilities, environmental resources, and construction management.

Approval of this application does not constitute approval of final construction plans. Instead, approval establishes the conditional land-use framework under which the Applicant must still satisfy County engineering, utilities, transportation, floodplain, environmental, and agency permitting requirements before any site construction can proceed.

Executive Summary

The application is appropriately framed as a low-density, single-family Rural Residential Development rather than a high-intensity subdivision. The publicly indexed case notice identifies a request for 150 single-family lots on approximately 153.23 acres, which equates to approximately 0.98 dwelling units per gross acre. The RRD process is the correct vehicle for a strictly residential project of this scale in the Agricultural/Residential-Rural context, and it gives Polk County the ability to attach binding conditions to mitigate impacts and ensure compatibility.

The Applicant recognizes that Deeson Road and the Kathleen area have generated public concern regarding drainage, traffic, rural character, and cumulative growth. Those concerns should be addressed directly through technical review and enforceable conditions. A denial is not necessary where the County can require traffic review, stormwater design, environmental permitting, utility capacity, buffers, buyer disclosures, and construction management before construction authorization.

In addition, approximately 93.28 acres, representing roughly 61% of the property, will remain as wetlands, floodplain, open space, agricultural areas, and stormwater-related tracts, concentrating development on suitable uplands through a clustered RRD design.

Requested Action

Approve Case LDPD-2026-6 for the Kathleen Reserve / Deeson Road RRD, subject to the condition framework included in this submittal and any reasonable technical conditions recommended by County staff that are tied to adopted review criteria.

Project and Procedural Overview

Item	Summary
Case	LDPD-2026-6
Project name	Kathleen Reserve / Deeson Road RRD
Applicant / owners	Eric Swanson, applicant; Deeson Road, LLC and SR Investments & Holding, LLC, owners, per publicly indexed notice.
Request	Rural Residential Development for 150 single-family lots on approximately 153.23 +/- acres.
Gross density	Approximately 0.98 dwelling units per gross acre, calculated from 150 lots divided by 153.23 acres.
Primary issue set	Compatibility, transportation, stormwater/flooding, utilities, environmental resources, public facilities, and enforceable conditions.

Approval Rationale

1. The RRD process is the proper review tool.

Polk County materials describe Rural-Residential Development as the planned-development mechanism in the Agricultural/Residential-Rural context for strictly residential developments under 160 acres. The public notice identifies this request as an RRD for approximately 153.23 acres and 150 single-family lots. The request therefore fits the structure of the RRD review framework and should be evaluated under that framework, including the County ability to impose project-specific conditions.

2. The project is low-density and single-family in character.

The proposed 150-lot program over approximately 153.23 gross acres is approximately 0.98 dwelling units per acre. The Applicant is not requesting townhomes, multifamily, commercial, or mixed-use development. The County can further ensure compatibility by limiting the approval to single-family detached residential use and capping the lot count in the approval conditions.

3. Conditions can directly address rural compatibility.

Planned development is most effective when it replaces uncertainty with enforceable obligations. The Applicant is prepared to accept conditions related to perimeter buffering, open-space tract maintenance, preservation of existing vegetative edges where feasible, rural/agricultural buyer disclosures, HOA maintenance of common areas, and substantial compliance with the approved RRD plan.

4. Transportation concerns can be tied to final engineering & concurrency.

The Applicant should be required to satisfy all County transportation requirements before final plat or construction authorization, including access, sight distance, turn-lane analysis, traffic impacts, proportionate share where applicable, and site circulation. County public records also show a County-approved construction agreement with CSX for the CR 35A Kathleen Road @ Deeson Road Intersection Improvement Project, reflecting that the area is already within an active public infrastructure review context. The project should be required to coordinate with those requirements, with mitigation measures evaluated and implemented through the County's transportation review process rather than be denied before technical mitigation is finalized.

5. Drainage & flood concerns should be resolved through permit-level engineering.

The Applicant should accept a condition that no construction may occur until final stormwater engineering demonstrates compliance with County drainage and floodplain criteria, water-quality treatment requirements, legal outfall requirements, no adverse offsite impact, and applicable SWFWMD Environmental Resource Permit requirements. This approach directly responds to drainage concerns while preserving the normal engineering sequence for a conditional land-use approval.

6. Utilities, schools, emergency services, and environmental resources remain protected.

Approval should be conditioned on utility availability, fire-flow confirmation, school/public-facility review, impact-fee obligations, emergency-access compliance, wetland and listed-species review, and all required local, regional, state, and federal permits. These requirements ensure that approval of the RRD does not bypass any later technical review.

Proposed Condition Framework for Inclusion in Approval Motion

The following conditions are intentionally written as hearing-ready language that can be revised by County staff or counsel:

- The approval shall be limited to a maximum of 150 single-family detached residential lots unless amended through the applicable public hearing process.

- The approval shall not authorize townhome, multifamily, commercial, industrial, or nonresidential development, except for customary accessory/common area uses serving the single-family residential project.
- Development shall occur in substantial compliance with the approved RRD plan, subject only to minor engineering adjustments approved by County staff that do not increase density, reduce required buffering, or materially alter the approved access framework.
- No construction activity shall commence until Polk County has approved final construction plans and the Applicant has obtained all required local, regional, state, and federal permits.
- Prior to final construction plan approval, the Applicant shall satisfy County transportation, access, site-distance, turn-lane, and proportionate-share requirements, if any.
- Final stormwater design shall demonstrate compliance with County drainage and floodplain criteria and applicable SWFWMD ERP requirements, including no adverse offsite impact.
- The final plan shall include perimeter buffering and/or existing vegetative preservation where feasible adjacent to existing rural residential or agricultural properties.
- The Applicant shall demonstrate lawful potable water, wastewater, and fire-flow service prior to construction plan approval.
- The Applicant shall complete required environmental review, wetland delineation, listed-species coordination, and agency permitting before land disturbance in affected areas.
- A homeowner’s association or other County-approved entity shall maintain private common areas, stormwater tracts, landscape/buffer areas, and open-space tracts.
- Construction plans shall include erosion control, dust control, stabilized construction access, and construction management notes.
- Project covenants or buyer disclosures shall acknowledge the rural/agricultural context of the surrounding area and the potential continuation of lawful rural or agricultural activities nearby.

Response to Principal Public Concerns

Concern	Applicant Response
Rural character	The project is single-family only and can be conditioned with buffers, open space, and rural/agricultural disclosures.
Flooding and drainage	Construction should be prohibited until permit-level stormwater engineering proves no adverse offsite impact and satisfies County/SWFWMD criteria.
Traffic safety	Approval can require traffic review, access improvements, turn-lane or proportionate-share obligations, and County engineering acceptance before final plat/construction.
Cumulative growth	The application should be evaluated under adopted criteria and conditioned specifically; generalized concern cannot replace evidence-based review.
Public accountability	A condition sheet tied to the approved plan creates enforceability and gives County staff clear benchmarks during construction plan review.

Conclusion

The Applicant respectfully requests that Polk County approve the Kathleen Reserve / Deeson Road RRD, Case LDPD-2026-6, subject to reasonable conditions. This approach honors the County review process, directly addresses neighborhood concerns, and ensures that no construction can proceed until final engineering, concurrency, utilities, stormwater, environmental, and agency approvals are obtained.

Closing Request

For the reasons stated above, the Applicant requests that the Planning Commission approve the application, or recommend approval as applicable, with the condition framework attached to this submittal and any additional reasonable staff conditions supported by the record.

References Used for Case-Control Fact

Polk County public notice search result: Case File LDPD-2026-6; Eric Swanson, applicant; Deeson Road, LLC and SR Investments & Holding, LLC, owners; Rural Residential Development (RRD) for 150 single-family lots on approximately 153.23 +/- acres; property north of Deeson Road. <https://polkcounty.column.us/search>

Polk County GIS Planned Developments layer: Describes Rural-Residential Development (RRD) in the Agricultural/Residential-Rural (A/RR) designation pursuant to Policy 2.121-B and identifies RRD as the planned-development mechanism for strict residential developments under 160 acres.

https://gis.polkcounty.net/hosting/rest/services/Accela/APO_Layer_Map/MapServer/13

Polk County Land Development Division: Describes the division role in coordinating engineers, surveyors, attorneys, planners, the Comprehensive Plan, Land Development Code, Utilities Code, county engineer, and floodplain management.

<https://www.polkfl.gov/government/planning-and-development/land-development/>

Polk County Legistar, Board of County Commissioners May 20, 2025: Approved construction agreement with CSX for CR 35A Kathleen Road @ Deeson Road Intersection Improvement Project. <https://polkcountyfl.legistar.com/MeetingDetail.aspx?GUID=BFB36344-0D01-4447-A340-233D2C9F81E3&ID=1230997&Options=&Search=>

SWAN CAPITAL'S RESPONSES TO STAFF / PUBLIC / AGENCY COMMENTS

*Kathleen Reserve RRD
Polk County, Florida | Case LDPD-2026-6*

Prepared for inclusion in the record before the Polk County Planning Commission
Prepared by Plan Florida LLC | June 2026

Purpose and Requested Action

The Applicant respectfully submits this response-to-comments package for the Kathleen Reserve / Deeson Road RRD application, Case LDPD-2026-6. The requested action is approval of the Rural Residential Development with reasonable, enforceable conditions that address compatibility, stormwater, transportation, utility, and environmental review criteria while allowing a low-density single-family project to proceed through final engineering and agency permitting.

Project Control Facts

Item	Current Draft Control Fact	Response Significance
Case number	LDPD-2026-6	Provides a stable reference for staff, public notice, and hearing materials.
Applicant / owners	Eric Swanson, applicant; Deeson Road, LLC and SR Investments & Holding, LLC, owners.	Identifies the applicant team and property ownership record cited in public notice.
Request	Rural Residential Development (RRD) for 150 single-family lots on approximately 153.23 +/- acres.	The request is for single-family residential use at an approximate gross density of 0.98 dwelling units per acre.
Location	North of Deeson Road, within the Kathleen area of unincorporated Polk County.	Frames the compatibility, traffic, drainage, and neighborhood-transition analysis.
Review framework	RRD is a planned-development mechanism in the Agricultural/Residential-Rural context for strict residential developments under 160 acres.	The requested process is not a loophole; it is the county framework for conditional and site-specific rural residential review.

Response-to-Comments Matrix

The following matrix is formatted to be conformed directly to the staff report. Replace bracketed placeholders with exact page numbers, plan sheet references, agency letter dates, and final consultant exhibits before submittal.

#	Staff / Public / Agency Comment	Applicant / Developer Response	Supporting Exhibit / Commitment
1	Staff recommendation /sufficiency of the RRD request	The application should be reviewed as a site-specific Rural Residential Development under the applicable Comprehensive Plan and Land Development Code criteria. The RRD process exists to attach binding conditions, evaluate compatibility, and require final engineering, concurrency, environmental, and agency review before construction. The Applicant requests approval subject to the conditions in this matrix.	Revised RRD plan; proposed conditions; final engineering to be reviewed before construction plan approval.
2	Compatibility with the Kathleen rural residential context	The project is limited to single-family detached residential use and is not requesting townhomes, apartments, commercial development, or industrial use. At 150 lots over approximately 153.23 acres, the gross density is approximately 0.98 dwelling units per acre excluding stormwater, open space, roads, and environmental tracts. The plan can be conditioned to provide perimeter transitions, preservation of existing vegetation where feasible, and buffering adjacent to existing rural homes and agricultural uses.	Condition 1: maximum 150 lots; Condition 2: single-family only; Condition 5: perimeter buffering/ open space transition.
3	Alleged excessive density or overdevelopment	A lot-count objection must be evaluated against the adopted Comprehensive Plan and LDC criteria, together with the applicable Comprehensive Plan, compatibility, environmental, and infrastructure criteria. The proposal remains low-density on a gross-acre basis and uses the RRD framework to cluster lots and preserve meaningful common/open-space and stormwater areas. Final density and dimensional standards should be locked by the approved plan and conditions.	Approved RRD plan; lot-count cap; open-space and stormwater tract schedule.
4	Consistency with A/RR and RRD policy framework	The publicly indexed case information identifies the request as an RRD. Polk County materials describe RRD as the planned-development vehicle in the Agricultural/Residential-Rural context for strictly residential projects under 160 acres. The project acreage is approximately 153.23 acres, and the proposed use is single-family residential, bringing the request within the correct review mechanism.	Staff report policy analysis; LDC/Comp Plan consistency table; final RRD plan.
5	Prior application history / prior	Any prior action should not substitute for the required review of the current application, plan, evidence, and proposed conditions. The current record should focus	Revised plan narrative; comparison table of prior

	denial concerns	on whether this specific 150-lot RRD plan can satisfy the County criteria through enforceable conditions, final engineering, and agency permitting. If the Board has concerns from prior proceedings, those concerns can be addressed with conditions rather than a categorical denial.	and current proposals, if available.
6	Traffic, Deeson Road, Kathleen Road, and operational safety	The Applicant should commit to the required traffic methodology, operational analysis, site-access design, turn-lane analysis, proportionate-share obligations, and construction plan review required by Polk County and any reviewing transportation agency. The project should not receive plat or construction approval until required access improvements are accepted by the County. The public record also shows County attention to the CR 35A Kathleen Road @ Deeson Road intersection improvement area, which should be acknowledged in the project concurrency analysis.	Traffic Impact Analysis; access-management plan; County transportation conditions; proportionate-share agreement, if required.
7	Drainage, flooding, and Kathleen drainage basin concerns	Approval of the RRD should be conditioned on a final stormwater design that demonstrates no adverse offsite impact, meets County floodplain and drainage criteria, and obtains all required permits. The Applicant should state clearly that final engineering will attenuate post-development discharge, provide water-quality treatment, preserve legal drainage outfalls, and comply with SWFWMD Environmental Resource Permit requirements where applicable.	Preliminary drainage narrative; master stormwater plan; SWFWMD ERP or exemption; floodplain analysis.
8	Wetlands, surface waters, natural resources, and listed species	The Applicant should commit to wetland delineation, avoidance/minimization, agency coordination, listed-species review, and required state/federal permits prior to construction. The RRD approval should not authorize wetland impacts or land clearing until those reviews are complete.	Environmental assessment; wetland survey; listed-species report; agency permits.
9	Water, wastewater, and utility capacity	Utility service must be addressed through the County Utilities Code, final utility design, availability letters, and construction plan approval. The Applicant should accept a condition requiring demonstration of potable water, wastewater, and fire-flow service before plat/construction authorization. If offsite utility extensions or easements are required, those should be shown on the final engineering plans.	Utility availability letter; utility construction plans; easement documents; fire-flow confirmation.
10	Fire, EMS, law enforcement, and emergency access	The final plan will be required to meet County emergency access, road width, turn-around, hydrant spacing, addressing, and fire-flow requirements. A condition can require Fire Marshal approval before construction plan approval and before final plat acceptance.	Fire Marshal comments; emergency access exhibit; hydrant/fire-flow plan.
11	Schools and public facilities	Residential concurrency and school capacity should be evaluated under applicable County and School District procedures. The Applicant should commit to payment of lawfully applicable impact fees and compliance with any school concurrency or	School capacity letter; impact fee acknowledgement;

	capacity determination applicable at the time of final approval.	concurrency documentation.
1	Adjacent residents can be protected with perimeter buffers, tree preservation where feasible, construction-hour controls, stabilized construction access, dust control, erosion control, and HOA maintenance obligations for common tracts. These commitments are appropriate conditions for a planned development.	Buffer exhibit; tree save plan; construction management condition; HOA documents.
2	The Applicant should accept final access location, driveway spacing, sight-distance, signage, internal street, sidewalk/pathway, and pedestrian-safety requirements as determined by County engineering staff. Where sidewalks are not contextually appropriate, the final plan should identify the County-approved rural alternative.	Access plan; roadway cross-sections; site-distance exhibit; pedestrian circulation plan.
3	A rural residential project adjacent to agricultural or large-lot property should include appropriate buffering, drainage protection, and buyer disclosures/HOA documents acknowledging nearby rural and agricultural activities. This reduces future conflict and improves compatibility.	Agricultural interface note; HOA/deed disclosure; buffer plan.
4	Public concerns are part of the record and should be addressed with evidence and enforceable mitigation. However, generalized opposition does not by itself establish inconsistency where the project complies with adopted criteria and conditions can address impacts. The Applicant should continue outreach, provide a concise project fact sheet, and make the technical commitments easy for residents to understand.	Community meeting summary; FAQ; written outreach record; revised condition package.
5	The Applicant agrees that any approval should be tied to the final RRD plan, maximum lot count, transportation requirements, stormwater permitting, utility capacity, environmental permitting, and construction management. These conditions create accountability while allowing the project to proceed through the ordinary engineering process.	Condition sheet to be included with approval motion.
6		

Proposed Developer Conditions for Approval

- Maximum development program: Approval shall be limited to no more than 150 single-family detached residential lots unless a subsequent public hearing amendment is approved by Polk County.
- Use limitation: The RRD shall be limited to single-family detached residential uses and customary accessory/common area uses; no townhomes, apartments, commercial, industrial, or nonresidential end uses are approved by this RRD.

- **Final engineering:** No construction activity shall commence until final construction plans are approved by Polk County and all required local, regional, state, and federal permits are obtained.
- **Transportation:** Prior to final plat or construction plan approval, the Applicant shall satisfy County transportation review, site-access, turn-lane, sight-distance, traffic-impact, and proportionate-share requirements, if applicable.
- **Stormwater/no adverse impact:** Final engineering shall demonstrate compliance with County drainage/floodplain criteria and applicable SWFWMD ERP requirements, including no adverse offsite impact and legally adequate discharge.
- **Perimeter transition:** The final plan shall include perimeter buffering and/or preservation of existing vegetative edges where feasible adjacent to existing rural residential/agricultural properties, with final location and width to be shown on the approved construction plans.
- **Utilities:** Prior to construction plan approval, the Applicant shall demonstrate lawful potable water, wastewater, and fire-flow service and obtain all necessary utility approvals, easements, and connection permissions.
- **Environmental compliance:** Wetlands, listed species, and protected natural resources shall be addressed through required surveys and agency permits before site clearing or construction in affected areas.
- **Construction management:** Construction access, hours, erosion control, dust control, and stabilization measures shall be shown on construction plans and maintained during development.
- **HOA/common tract maintenance:** Stormwater, open space, landscape, buffer, and common areas shall be maintained by a homeowners association or other County-approved entity.
- **Buyer disclosures:** Covenants or closing disclosures shall acknowledge the project location within a rural/agricultural area and the potential for nearby agricultural and rural residential activities.
- **Substantial compliance:** Development shall occur in substantial compliance with the approved RRD plan, subject to minor engineering adjustments approved by County staff that do not increase density or materially reduce required mitigation.

Requested Staff / Planning Commission Action

Based on the low-density single-family nature of the request, the availability of the RRD process to condition rural residential development, and the Applicant commitments described above, the Applicant respectfully requests approval of Case LDPD-2026-6 subject to reasonable conditions and final technical review.

Sources Used for Case-Control Facts

Polk County public notice search result: Case File LDPD-2026-6; Eric Swanson, applicant; Deeson Road, LLC and SR Investments & Holding, LLC, owners; Rural Residential Development (RRD) for 150 single-family lots on approximately 153.23 +/- acres; property north of Deeson Road. <https://polkcounty.column.us/search>

Polk County GIS Planned Developments layer: Describes Rural-Residential Development (RRD) in the Agricultural/Residential-Rural (A/RR) designation pursuant to Policy 2.121-B and identifies RRD as the planned-development mechanism for strictly residential developments under 160 acres. https://gis.polk-county.net/hosting/rest/services/Accela/APO_Layer_Map/MapServer/13

Polk County Land Development Division: Describes the division role in coordinating engineers, surveyors, attorneys, planners, the Comprehensive Plan, Land Development Code, Utilities Code, county engineer, and floodplain management. <https://www.polkfl.gov/government/planning-and-development/land-development/>

Polk County Legistar, Board of County Commissioners May 20, 2025: Approved construction agreement with CSX for CR 35A Kathleen Road @ Deeson Road Intersection Improvement Project. <https://polkcountyfl.legistar.com/MeetingDetail.aspx?GUID=BF836344-0D01-4447-A340-233D2C9F81E3&ID=1230997&Options=&Search=>