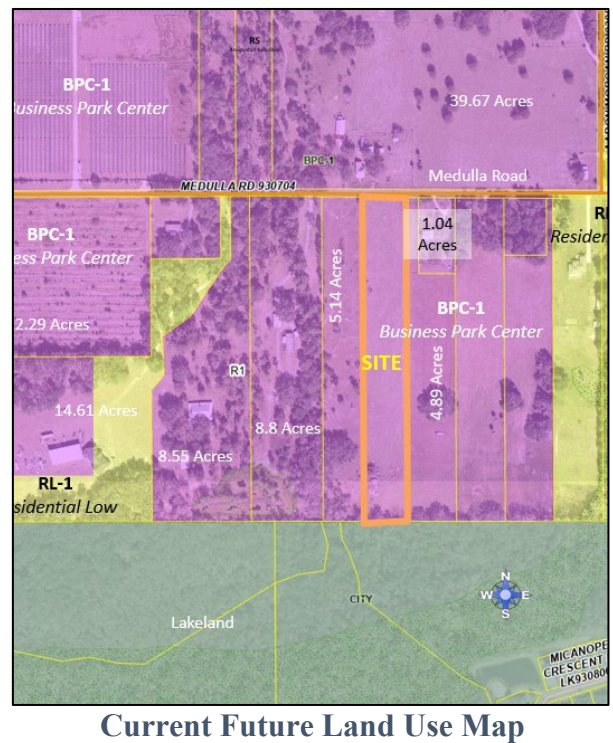
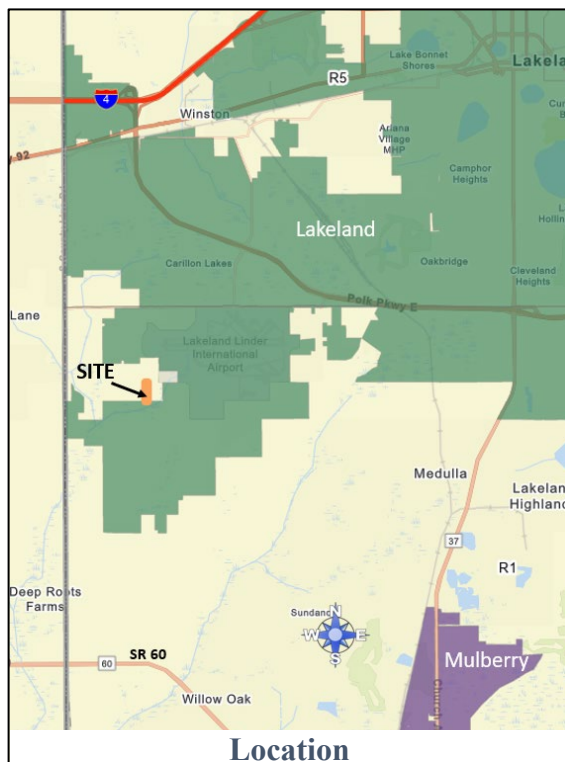


**POLK COUNTY
DEVELOPMENT REVIEW COMMITTEE
Staff Report**

Application Details:

DRC Date:	April 2, 2026
Planning Commission Date:	May 6, 2026
BoCC Dates:	May 19, 2026
Applicant:	Anielsys Salgado
Level of Review:	Level 4 Review, Small-Scale Comprehensive Plan Map amendment
Case Number and Name:	LDCPAS-2026-11 Medulla Road RL
Request:	Future Land Use designation change from Business Park Center (BPC) to Residential Low (RL) in the Urban Growth Area
Location:	Located south and west of Medulla Road, east of County Line Road, north of Pipkin Road, and south, west and north of Lakeland, in Section 08, Township 29, Range 23.
Property Owner:	Anielsys Salgado
Parcel Size:	5.14 acres (23-29-08-000000-033040)
Development Area/Overlays:	Urban Growth Area (UGA)
Future Land Use:	Business Park Center (BPC)
Nearest Municipality	Lakeland
DRC Recommendation:	Approval
Planning Commission Vote:	Pending
Case Planner:	Chanda Bennett, Comprehensive Planning Administrator



Summary of Analysis:

This is an applicant initiated Small-Scale Comprehensive Plan Map Amendment (CPA) modifying the Future Land Use (FLU) designation on 5.14 +/- acres from Business Park Center (BPC) to Residential Low (RL) within the Urban Growth Area (UGA). The applicant is requesting this for a single-family structure. The current BPC has a Land Development Code (LDC) district of BPC-1. If this request is approved, the LDC district for the RL will be RL-1. The applicant does have some farm animals and farm buildings on the subject site.

The Board of County Commissioners denied a Comprehensive Plan amendment request (LDCPAS-2020-2) on July 7, 2020, to change the Future Land Use designation from BPC to RL. The staff recommended denial of the case in 2020, but the Planning Commission recommended approval 5:1. The current owner and applicant purchased the property in 2021, understanding it was BPC. However, the GIS Data Viewer wrongly displayed the Future Land Use (FLU) designation of the property as RL. The time of the display on the viewer cannot be identified.

Three different staff members indicated to the applicant the FLU was RL and the applicant proceeded with a Road Frontage Waiver to Section 820 requiring 210 feet of frontage on a collector road for residential purposes (LDWA-2023-44) and then submitted a building permit for a residential home (BR-2026-290). BR-2026-290 was put on hold by the Building Division to investigate the parcel, and Planning staff identified the mapping error.

Most of the property south of Medulla Road is designated for residential purposes with 29 percent (%) of the unincorporated Future Land Use designations within the BPC designation. There are no non-residential uses within the BPC designation south of Medulla Road with a few of the properties having a residential structure. The BPC south of Medulla Road is close to Lakeland Linder Airport that continues to expand. The City of Lakeland has provided a letter included in the staff report as well as a sample avigation easement under separate cover that City is requesting be executed and recorded by the applicant.

Staff is recommended approval based on the following:

1. The unincorporated Future Land Use designation south of Medulla Road includes Residential Suburban (RS), Residential Low (RL), and Business Park Center (BPC). The RS is 151 acres, the RL is 22.2 acres, and the BPC is 71 acres of the unincorporated property south of Medulla Road. The residentially designated properties south of Medulla Road equal 70 percent (%) of the unincorporated property. The BPC equals 29%. However, there are no non-residential primary uses south of Medulla Road other than the cemetery at the southeast corner of Medulla Road and County Line Road. The following are facts of the parcels south of Medulla Road in unincorporated Polk County in the RL, RS and BPC combined:
 - a. 67.3% of the parcels have residential structures
 - b. 23% of the parcels are vacant or have pasture or cropland
 - c. 9.6% of the parcels have agricultural with residential improvements
2. The Gresham Farms Village development has been constructed since 2020 in the city of Lakeland which includes 78 homes west of the subject site and south of Medulla Road near County Line Road.
3. There are five (5) out of 12 parcels in the BPC, south of Medulla Road within unincorporated Polk County, and have a residential DOR code per the Property Appraiser's website. These structures have been in place since before the adoption of

the Comprehensive Plan. The other parcels within the BPC are vacant or have a pasture Department of Revenue Code.

Compatibility Summary

The subject site is bordered by Business Park Center-1 (BPC-1) to the west, east and north. The southern portion of the property abuts Lakeland city limits which contain preservation and wetlands and a residential designation. The uses in the surrounding neighborhood are single family residential, pasture, and citrus all south of Medulla Road and a solar farm owned by the City of Lakeland on the north side of Medulla Road. The recent Future Land Use changes to the area have been from BPC to RL, but on the edges of the BPC. The Lakeland Linder Regional Airport is in the vicinity of the subject site and with the expected growth of the airport, noise levels may become a concern to future residents of this area.

Compatibility, according to Policy 2.102-A2 of the Comprehensive Plan, states, “Land shall be developed so that adjacent uses are compatible with each other, so that one or more of the following provisions are accomplished: a) there have been provisions made which buffer incompatible uses from dissimilar uses; b) incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; c) uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.”

When development switches between a residential use and a non-residential use, it can create undue impacts to each. It decreases the opportunity for BPC to be developed in planned projects capable of being expanded and developed in stages. However, the pattern of existing homes in the BPC decreases this opportunity as well, unless the parcels are consolidated under one development. However, since 2020, the city of Lakeland has permitted the Gresham Farms Village which includes 78 homes west of the subject site and south of Medulla Road near County Line Road. In addition, the Publix has been completed and open at the northeast corner of County Line Road and Pipkin Road. Staff have not identified any primary non-residential uses south of Medulla Road other than the cemetery at the southeast corner of Medulla Road and County Line Road.

Section 220 of the LDC requires a 50-foot setback from a residential structure or a residentially designated property line. If this land use change request is approved, the 50-foot compatibility setback will be from the east and west property line of the subject site. The side setback for BPC is 20 feet. Therefore, any development consistent with BPC on the parcels to the east and west of the subject site will have to set their buildings back an additional 30 feet. The 50-foot compatibility zone can be used for parking and retention.

The City of Lakeland’s Southwest Sector Plan identifies the area south of Medulla Road as Opportunities for “Cluster-Style Residential Development to Facilitate Open Space Preservation.” The area on the north side of Medulla Road, west of the Lakeland Linder Airport, is designated as “Restricted Development, Limited to Business Park or Very Low Density/Rural/Residential Development.” There is a solar facility to the northwest of the subject site in the City of Lakeland’s jurisdiction.

Infrastructure and Urban Service's Summary

The subject site has direct access to Medulla Road. Medulla Road is classified as an Urban Collector County road. Medulla Road is a paved, two-lane, 20-foot-wide road with about 30 to 35 feet of right-of-way in front of the subject site. There are no paved shoulders or sidewalks along this east/west stretch of Medulla Road and the Pavement Condition Index is "Fair."

The property site shall meet the development requirements in the UGA. Public safety services, such as Fire, EMS and Sheriff are available in this area as shown in this staff report. The subject site is located in the city of Lakeland's utility service area. The proposed amendment will not have a negative impact on the Polk County School District.

Environmental Conditions Summary

If the subject site develops with a single-family home it is not anticipated to have a negative impact upon the environmental features present. The site is not located in a Wellfield-Protection District and is located within a one-mile buffer area of endangered plant/animal community. The soil on the subject site is include Pomona Fine Sand and Sparr sand, 0 to 5 percent slopes. The site is located within the Lakeland Linder Regional Airport and South Lakeland Airpark Overflight Zones and the Lakeland Linder Regional Airport In-Flight Visual Interference Zone identified on the County's Airport Impact Designation Map.

Comprehensive Plan

The relevant sections of the Comprehensive Plan are applicable to the project request.

- Section 2.102 Growth Management
- Division 4.400 Glossary "Compatibility"
- Section 2.105 Urban-Growth Areas (UGA)
- Section 2.113B Business Park Center
- Section 2.119 Residential
- Section 2.120-C Residential Low (RL)

Land Development Code

The relevant sections of the Land Development Code are applicable to the project request.

- Section 220 – Compatibility

Findings of Fact

Request and Legal Status

- *The applicant is requesting a Future Land Use (FLU) designation change on 5.14 +/- acres to parcel ID # 232908-000000-033040 from Business Park Center (BPC) to Residential Low (RL).*
- *The subject site is located in the Urban Growth Area (UGA), south of Medulla Road, east of County Line Road, north of West Pipkin Road in Section 08, Township 29, Range 23.*
- *The current Land Development Code district is BPC-1. If this request is approved the LDC district will be RL-1 which permits one unit per acre with an administrative review. Approval of a Planned Development by the Planning Commission may permit up to five (5) dwelling units to the acre.*
- *The Board of County Commissioner denied a Comprehensive Plan amendment request (LDCPAS-2020-2) on July 7, 2020, to change the Future Land Use designation from BPC to RL.*
- *The current owner and applicant purchased the property in 2021, understanding it was BPC. However, the GIS Data Viewer wrongly displayed the Future Land Use (FLU) designation of the property as RL. The time of the display on the viewer is not able to be identified.*
- *Three different staff indicated to the applicant the FLU was RL and the applicant proceeded with a Road Frontage Waiver to Section 820 requiring 210 feet of frontage on a collector road for residential purposes (LDWA-2023-44) and then submitted a building permit for a residential home (BR-2026-290). BR-2026-290 was put on hold as Building Division staff put the request on hold to investigate the parcel and Planning staff identified the mapping error.*
- *The applicant has applied for the following land development requests:*

Case Number	Request	Notes
LDDRC-2021-180	Pre-application Commercial Vehicle Parking	Staff identified the parcel as BPC and the steps to achieve the requested use
LDNON-2021-151	Level 2 Review Commercial Vehicle Parking	Withdrawn per applicant email stating desire to do a party venue
LDWA-2023-44	Road Frontage Waiver to LDC Sec. 820	210 Feet of frontage require. Subject site has 171 feet of frontage on Medulla Road
BR-2026-290	Building permit for residential home	On hold pending this request

- *Of the properties south of Medulla Road in unincorporated Polk County to County Line Road, the following facts exist:*
 - *66.1% of the parcels have residential structure*
 - *23% of the parcels are vacant or have pasture or cropland*

- *9.4% of the parcels have agricultural with residential*
 - *65% of the area is in RS*
 - *6.1% of the area is in RL*
 - *29% of the area is in BPC*
 - *There are 12 parcels in the BPC that is south of Medulla Road.*
 - *5 of the parcels (41%) in BPC have a residential home on the property.*
- *Three different staff indicated to the applicant the FLU was RL and the applicant proceeded with a Road Frontage Waiver to Section 820 requiring 210 feet of frontage on a collector road for residential purposes (LDWA-2023-44) and then submitted a building permit for a residential home (BR-2026-290). BR-2026-290 was put on hold as Building Division staff put the request on hold to investigate the parcel and Planning staff identified the mapping error.*
 - *The site plan for BR-2026-190 labels the west side setback as 32.2 feet and the east side setback from the proposed home as 34 feet.*

Compatibility

- *The subject property is bordered by Business Park Center-1 (BPC-1) to the west, east and north. The southern portion of the property abuts Lakeland city limits which contains preservation and wetlands and a residential designation.*
- *The recent Future Land Use changes to the area south of Medulla have been from BPC to RL but mostly on the edges of the BPC including the following:*
 - *CPA 16S-13 approved December 23, 2016*
 - *LDCPAS 18-2 approved August 7, 2018*
 - *LDCPAS 2018-6 approved January 8, 2019*
 - *LDCPAS-2018-1 approved August 7, 2018*
- *According to the City of Lakeland's Southwest Lakeland's Sector Plan, the subject site is within the blue designated color which indicates "Opportunities for Cluster-Style Residential Development to Facilitate Open Space Preservation."*
- The Gresham Farms Village development has been constructed since 2020 in the city of Lakeland which includes 78 homes west of the subject site and south of Medulla Road near County Line Road.
- The City of Lakeland has submitted a letter of opposition as well as a request that if this is approved the applicant execute and record an avigation easement similar to the sample provided by the City of Lakeland.
- The side setback in BPC is 20 feet.
- Section 220 provides a 50-foot compatibility building setback in BPC from property designated as residential.

Infrastructure

- *The zoned schools are as follows: R. Bruce Wagner Elementary, Sleepy Hill Middle and George Jenkins Senior High. All schools have available capacity at this time.*
- *Both fire and ambulance response to the subject parcel is primarily from Polk County Fire Rescue Station 2, 2523 Ewell Rd, Lakeland. The travel distance is 4.5 miles and response times should average between 10 and 12 minutes under optimal conditions but can vary significantly based on many factors.*
- *The subject property is served by the Polk County Sheriff Office's Southwest District located at 4120 US 98 South. Priority one (1) response is nine minutes and 56 seconds. Priority two (2) response is one hour and seven minutes.*
- *The subject property is located within the City of Lakeland's Utility Service Area, however, sewer is not available or contiguous to the subject property. The subject site will have to utilize a septic tank and is noted on BR-2026-290.*
- *The subject property is located within the City of Lakeland's utility area for water, however, water is not available currently. The applicant will utilize a private well system for potable water which is noted on BR-2026-290.*
- *The nearest Community Investment Project is near the intersection of Hamilton Road and Medulla Road to the west for drainage improvements to address street and home flooding. Right-of-way acquisition is currently in progress. The project completion is expected on December 1, 2027.*
- *Other recent completed projects include the widening of West Pipkin Road (Medulla Road to SR 37/S. Florida Avenue) from two-lanes to four-lanes from Medulla Road to South Dossey Road and widen remainder to three-lanes from South Dossey Road to SR 37/S. Florida Ave (total length is around 4.2 miles).*
- *There are no sidewalks along Medulla Road. There are some sidewalks along Medulla Road from its intersection with Pipkin Road but stop at the entrance to Sun N Fun.*

Environmental

- *The subject property has the highest elevation of slightly over 121 feet on the north end of the property adjacent to Medulla Road and slopes to the south to slightly over 107 feet.*
- *The southwestern corner (about 8,344 square feet) is in the FEMA 100-year Flood zone A. This means that a base floor elevation has not been determined. As long as there is not development proposed in the flood zone, a flood study will not be required.*
- *According to the Florida Natural Areas Biodiversity Matrix (2021), a portion of the subject site is located within a one-mile radius of protect or endangered animal sighting.*
- *The subject site is not located within any of the County's Wellhead Protection Districts.*

- *According to the United States Department of Agriculture-Soil Conservation Service, the subject property is approximately 40% Pomona Fine Sand, 60% Sparr sand, 0 to 5 percent slopes.*
- *The subject property does not contain any wetland areas. The south-west corner is located in Flood Zone A.*
- *Based on information received from the Secretary of State's Department of Historical Resources office, there are no archeological or historic resources on the site.*
- *The subject site is located within the Lakeland Linder Regional Airport and South Lakeland Airpark Airport Impact District. The subject site is within the Height Notification Subzone 1 for both airports and the Piston Engine Powered Aircraft Bird Strike Hazard Zone for Lakeland Linder Airport. The subject site is partially within the In-Flight Visual Interference Zone identified on the County's Airport Impact District Map.*
- *The PolkGreen Map shows a portion of this parcel as part of a potential connection of an overall natural network.*
- *This site does not have a conservation easement, but the property directly south is within a conservation easement per the Polk County Property Appraiser's website within the Morgan Creek Preserve development (OR 6108-886).*

Comprehensive Plan Policies

- *The Comprehensive Plan defines Compatibility in Division 4.400 as "A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition."*
- *The Polk County Comprehensive Plan lists POLICY 2.102-A2: COMPATIBILITY stating that Land shall be developed so that adjacent uses are compatible with each other and incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use.*
- *The Comprehensive Plan POLICY 2.102-A1: DEVELOPMENT LOCATION states that Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.*
- *The Polk County Comprehensive Plan lists POLICY 2.102-A10: LOCATION CRITERIA in stating that the following factors shall be taken into consideration when determining the appropriateness of establishing or expanding any land use or development area: a. nearness to incompatible land uses and future land uses, unless adequate buffering is provided.*

- *POLICY 2.120-C3: LOCATION CRITERIA - Residential-Low areas shall be located only within the TSDAs, UGAs, SDAs, and UEAs and new Residential-Low development shall not be located within Activity Centers. The placement of Residential-Low shall be evaluated based on the general criteria listed in Policy 2.119-A2.*

- *POLICY 2.120-C4: DEVELOPMENT CRITERIA - Residential development may contain a variety of housing types as defined by the Land Development Code within the TSDA. Outside the TSDA, RL may contain single-family dwelling units, duplex units, small-scale multi-family units, and family-care homes, and shall be permitted, with County approval, at a density of up to, and including, 5 DU/AC. Additionally, community facilities may be allowed in accordance with policies of this Plan.*

- *POLICY 2.119-A2: LOCATION CRITERIA - Residential land use categories shall be established throughout the County with consideration being given to the following criteria:*
 - *a. Access to county-maintained roads or roads constructed to County standards.*
 - *b. Proximity to Activity Centers .*
 - *c. Adequacy of water and sewage disposal systems (public and private).*
 - *d. Adequacy and response time for public safety services - fire, police, and emergency medical service.*
 - *e. Adequacy of recreation facilities.*
 - *f. Proximity of incompatible land uses .*
 - *g. Development limitations, and,*
 - *h. Urban Sprawl Criteria set forth in POLICY 2.102-A10.*

- *POLICY 2.119-A3: DEVELOPMENT CRITERIA - Residential development shall conform to the following criteria:*
 - *a. BUFFERING: Buffering, when provided to lessen the impact and friction between residential and non-residential land uses, may take the form of physical barriers, such as walls, fences, berms, landscaping, open spaces, or other similar design features.*
 - *b. DENSITY AND SCALE: New residential development, immediately adjacent to existing residential areas, should be designed so as to minimize any potential adverse impacts due to dissimilar densities or building scale.*
 - *c. HOUSING TYPES: Residential structures may include all various types, such as: conventionally built single-family dwelling units; attached or detached units; zero-lot-line structures; factory-built modular units; mobile homes; duplexes; townhouses; and apartment complexes, provided they meet appropriate location standards and meet adopted building codes and construction standards.*
 - *d. ACCESS TO STREETS: New residential development should have direct access to local streets, as specified in Policy 2.128-C3. Access to collector and arterial streets shall be provided by local streets at intervals meeting recognized safety standards. Private residential driveways should be discouraged on collector or arterial streets.*
 - *e. INTERNAL CIRCULATION: Residential developments should be designed to provide for an efficient internal circulation system to include the provision of collector streets and adequate parking in accordance to the scale of the development.*
 - *f. DENSITY COMPUTATIONS: Polk County shall use gross densities when determining residential densities. Gross density is determined by dividing the total number of dwelling units on the site by the total area of the residential site, exclusive of water bodies. The area for computing gross density shall include all*

public and institutional land uses (e.g. internal streets, sewer plants, schools, parks, etc.) located within the site, as well as one-half of the right-of-way area for perimeter "local" streets, and one-fourth of the right-of-way area for perimeter local street intersections, for those areas not already owned by the public. In the Rural Development Area (RDA) and Suburban Development Area (SDA), outside of the Green Swamp Area of Critical State of Concern, one unit per five-acre (1 du/5ac) density may also be measured to the centerline of collector roads.

- *The following are the relevant Comprehensive Plan policies and Land Development Code for this case:*

SECTION 2.102 (POLICY 2.102-A1 thru 2.102.A-15) Growth Management Policies

POLICY 2.102-A11: Urban Sprawl Criteria

SECTION 2.105 Urban-Growth Areas (UGA)

SECTION 2.109 (POLICY 2.109-A24) Land Use Categories

Section 220 Compatibility

Development Review Committee Recommendation: Based on the information provided by the applicant, recent site visits, and the analysis conducted within this staff report, the Development Review Committee finds that with the proposed conditions, the proposed requests **IS COMPATIBLE** with the surrounding land uses and general character of the area, **IS CONSISTENT** with the Polk County Comprehensive Plan and Land Development Code, and therefore, the Development Review Committee (DRC) recommends **APPROVAL of LDCPAS 2026-11**.

Planning Commission: On May 6, 2026, at an advertised public hearing, the Planning Commission voted **?? to Approve/Deny LDCPAS-2026-11**.

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

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

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

Surrounding Land Use Designations and Current Land Use Activity

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

Table 1

Northwest: BPC-1, A/RR further NW	North: BPC-1 Single Family/Pasture	Northeast: BPC-1
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Pasture, solar facilities, residential further NW		Single Family/Pasture, Lakeland Linder Airport
West: BPC-1, RL-1 and RS further west Pasture and residential further west	Subject Property: BPC-1 Pasture	East: BPC-1, RL-1 further west Pasture, residential and Lakeland Linder Airport further east
Southwest: City of Lakeland Preservation	South: City of Lakeland Preservation	Southeast: City of Lakeland Preservation and residential further southeast

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

Compatibility with the Surrounding Land Uses and Infrastructure:

Compatibility is often regarded as a subjective term used to express one’s opinion or feeling about the appropriateness of locating different uses adjacent to each other rather than being based upon facts or evidence to support those opinions or feelings. The American Planning Association (APA) defines compatibility as “the characteristics of different uses or activities or design which allow them to be located near or adjacent to each other in harmony.” Some elements affecting compatibility include (but are not limited to): height, scale, mass and bulk of structures, pedestrian or vehicular traffic, landscaping, lighting, noise, odor, or whether or not something is aesthetically pleasing (*Source: A Planner’s Dictionary; American Planning Association*).

According to *Policy 2.102-A2* of Polk County’s Comprehensive Plan, “land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; and c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.” The “development criteria” and the “density and dimensional regulations” of a land use district are often the measuring tools used by staff to determine compatibility and the appropriateness of locating differentiating uses.

The definition of Compatibility in the Comprehensive Plan is as follows:

COMPATIBILITY: A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.

The subject site is 5.14 +/- acres within the BPC FLU designation. The applicant is requesting to change the site to RL with a Land Development Code (LDC) default district to RL-1. The maximum density in RL is five (5) dwelling units per acre. However, the LDC district default will be RL-1 if this request is approved which only permits one (1) dwelling unit per acre. The subject site is 5.14 acres which may permit up to five (5) units with a Level 2 Review assuming all development standards can be met. Other alternatives for higher densities include 1) district change to RL-2, RL-3, or RL-4 which permit two (2), three (3) or four (4) units per acre respectively, or 2) a Level 3 Planned Development (PD) to achieve five (5) dwelling units per acre. A PD on the subject site will require 22 Locational Points to achieve the five (5) dwelling units per acre.

The subject property is located in unincorporated Polk County and completely bordered by single-family, undeveloped or pastureland directly to the east and west within the BPC. The land adjacent to the southern portion of the subject site is located within the City of Lakeland and contains wetlands and Morgan Creek Preserve a residential development to the southeast. There are residential buildings in the area south of Medulla Road. A home at 4590 Aaron Morgan Road was constructed in 2018. A home at 4414 Medulla Road was constructed in 2020. A home at 4636 Medulla Road was constructed in 2021. There are some farm related buildings on the subject site in the southwest area appearing on aerial photographs in 2022 and another small building in 2025.

Since the last Comprehensive Plan amendment on the subject site the Gresham Farms Village subdivision was constructed to the west of the subject site in the City of Lakeland’s jurisdiction with 78 homes. There are no non-residential uses on the south side of Medulla Road other than the cemetery at the southeast corner of County Line and Medulla Roads. Lakeland Linder Airport is to the east and northeast of the subject site on the other side of Medulla Road and there is a solar facility to the northwest of the site. Farther to the northwest include warehouse distribution uses along County Line Road north of Medulla Road.

According to the City of Lakeland’s Southwest Lakeland’s Sector Plan, the subject site is within the blue designated color which indicates “Opportunities for Cluster-Style Residential Development to Facilitate Open Space Preservation.” The area on the north side of Medulla Road is included within the Orange Color which is marked as “Restricted Development, limited to Business Park or Very Low Density/Rural Residential Uses.”

The residential development requested is consistent with the existing development patterns south of Medulla Road. However, the proposed RL is not consistent with the adjacent BPC.

Nearest Elementary, Middle, and High School

The applicant is requesting RL Future Land Use Designation in the UGA. The zoned schools are as follows: R. Bruce Wagner Elementary, Sleepy Hill Middle and George Jenkins Senior High. All schools have available capacity at this time.

Table 2: School Information

Name of School	Student Generation Rates @ 1 units per 5 acres	Capacity/Enrollment
R. Bruce Wagner Elementary	4	85.8%/1,038 with 25 reservations
Sleepy Hill Middle	3	77.64%/1,136 with 46 reservations
George Jenkins Senior High	3	90.1%/2,790 with 55 reservations

Source: Polk County School Board and “Estimating Maximum Feasible Build-out Study.” The anticipated demand is based upon annual student ratios per unit for single-family development. Elementary schools 0.144, Middle schools 0.083 and High schools 0.117. The capacity is based on occupied student stations includes reserved capacity.

Nearest Sheriff, Fire, and EMS Station

The nearest Sheriff and Fire/EMS stations are listed below (see Table 3). The distances are within a good range to have appropriate response times.

Table 3

	Name of Station	Response
Sheriff	Polk County Sheriff's Southwest District 4120 US 98 South, Lakeland	P1: 00:09:56 (9 min: 56 sec) P2: 01:07:00 (1 hour: 7 min: 0 sec)
Fire	Fire Station 02 2523 Ewell Rd., Lakeland	4.5 +/- miles Average response 10 to 12 minutes Can vary based on many factors.
EMS	Fire Station 02 2523 Ewell Rd., Lakeland	

Source: Polk County Sheriff's Office and Public Safety.

Water and Wastewater Demand and Capacity:

A. Estimated Demand and Service Provider:

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

Table 4

Proposed Site 5.14 +/- acres From BPC-1 to RL-1	Estimated Impact Analysis	
	<i>Estimated Maximum Permitted Use in BPC</i>	<i>Estimated Maximum Permitted Use in RL</i>
Permitted Intensity/Density	5.14 acres x 43560 x 0.75 FAR 167,924	5.14 acres x 5 dua = 25 unit
Potable Water Consumption (GPD)	167,924 x .24 GPD 40,302 GPD	25 x 250 GPD 6,250 GPD (84% reduction)
Wastewater Generation (GPD)	40,302 x 80% GPD 32,242 GPD	25 x 200 GPD 5,000 GPD (84% reduction)

Source: Polk County Concurrency Manual & Polk County Utilities Polk County Comprehensive Plan, Warehousing 0.24 Gallons Per Day (GPD)(maximum use, BPC Floor Area Ratio (FAR) of 0.75, Water at 250 GPD and Wastewater at 200 GPD
*Policy 2.119-A3.f, Development Criteria; Density Computations
**Wastewater generates approximately 80% of water

Table 4 above shows the proposed RL will be a decrease in water and wastewater needs at full build out. The maximum density in RL is five (5) dwelling units per acre. However, the LDC district default will be RL-1 if this request is approved which only permits one (1) dwelling unit per acre. The subject site is 5.14 acres which may permit up to five (5) units with a Level 2 Review assuming all development standards can be met. Other alternatives for higher densities include 1) district change to RL-2, RL-3, or RL-4 which permit two (2), three (3) or four (4) units per acre respectively, or 2) a Level 3 Planned Development (PD) to achieve five (5) dwelling units per acre. A PD on the subject site will require 22 Locational Points to achieve the five (5) dwelling units per acre. At the total of 25 units at five (5) units per acre, it is anticipated that there will be a 84% reduction in water and wastewater needs.

B. Available Capacity:

The subject property is located within Lakeland’s utility area for wastewater. The anticipated demand of the wastewater system at full buildout of 25 units is 5,000 Gallons Per Day (GPD) based on the maximum permitted use. However, sewer is not available or contiguous to the subject property. The subject site would have to utilize use of a septic tank much like other parcels in this area.

The subject property is located within Lakeland’s utility area for water. The anticipated demand on the water system at full buildout of 25 units is 6,250 Gallons Per Day (GPD) based on the maximum permitted use. However, water is not available at this time. The applicant would utilize a private well system for services.

C. Planned Improvements:

There are no utility improvements anticipated for this area of the County.

Roadways/ Transportation Network

A. Capacity and B. Conditions

The surrounding roadway network is adequate to serve the proposed Future Land Use designation. The parcel has direct road frontage on Medulla Road which is an urban major collector monitored by the Polk County Transportation Planning Organization (TPO) for traffic concurrency. The road has a Pavement Condition Index (PCI) rating is “Fair”. The paved surface width is 20 feet. Medulla Road has capacity and will serve any development on the subject without impacting the current LOS. Hamilton Road and Aaron Morgan Roads have a PCI rating of “Very Poor.”

Table 5

Proposed Site 5.14 ± acres From BPC-1 to RL-1	Estimated Impact Analysis	
	Existing Land Use designation (BPC)	Proposed Land Use designation (RL)
Permitted Density/	5.14 x 43,560 sq. ft. x 0.75 FAR= 167,924	5.14 acres @ 15ua = 25 units
Average Annual Daily Trips (AADT)	167,924 / 1,000 x 1.46 x 88% new trips = 216 AADT	25 x 7.81 196 trips (9.23% decrease)
PM Peak Hour Trips	167,924 / 1,000 x 0.15 x 88% new trips = 22 PM	25 x 1.01 25 trips (14% increase)
<i>Source: Polk County Transportation Planning Organization (TPO) and Trip Generation Manual – Institute of Transportation Engineers (ITE) ITE 150-Warehousing and 210-Single Family Detached *Policy 2.119-A3.f, Development Criteria; Density Computations</i>		

Table 6

Link #	Road Name	Current LOS	Available Capacity	Minimum LOS Standard	Projected Five Year LOS
8105E	Medulla Road (County Line Road to Pipkin Road W)	B	711 <i>732 in 2020</i>	D	B
8105W	Medulla Road (County Line Road to Pipkin Road W)	B	707 <i>735 in 2020</i>	D	B

Source: Polk Transportation Planning Organization, Roadway network Database 2026 – published 4-17-26

Tables 5 and 6 show the proposed development will not exceed available capacity levels. The maximum density with RL is one (1) dwelling unit per five (5) acres. However, the LDC district default will be RL-1 if this request is approved which only permits one (1) dwelling unit per acre. The subject site is 5.14 acres which may permit up to five (5) units with a Level 2 Review assuming all development standards can be met. Other alternatives for higher densities include 1) district change to RL-2, RL-3, or RL-4 which permit two (2), three (3) or four (4) units per acre respectively, or 2) a Level 3 Planned Development (PD) to achieve five (5) dwelling units per acre. A PD on the subject site will require 22 Locational Points. At the total of 25 units at five (5) units per acre only generate a 14% increase in the PM Peak hour over BPC. However, the development of the subject site under BPC or RL is not significant in terms of generating five (5) percent (5%) of the capacity of Medulla Road which is 75 trips out of 1,500 trips.

C. Planned Improvements

The nearest Community Investment Project is near the intersection of Hamilton Road and Medulla Road to the west for drainage improvements to address street and home flooding. Right-of-way acquisition is currently in progress. The project completion is expected on December 1, 2027.

Other recent completed projects include the widening of West Pipkin Road (Medulla Road to SR 37/S. Florida Avenue) from two-lanes to four-lanes from Medulla Road to South Dossey Road and widen remainder to three-lanes from South Dossey Road to SR 37/S. Florida Ave (total length is around 4.2 miles).

There are no sidewalks along Medulla Road. There are some sidewalks along Medulla Road from its intersection with Pipkin Road but stop at the entrance to Sun N Fun.

Park Facilities and Environmental Lands

The nearest County park facility is Christina Park about seven (7) +/- miles from the subject site. The nearest environmental lands are The Alafia Reserve, seven miles south of the site.

A. Location:

Christina Road Park is at 625 West CR 540-A on the north side of CR 540-A less than a quarter mile from SR 37.

B. Services

The Christina Road Park includes a playground area, benches, ADA-accessible trails, pavilions and picnic tables. There are first-come, first-served picnic shelters and a large, screened-in pavilion is available to rent. Additionally, Christina Park has a five-field softball complex.

C. Multi-use Trails:

There are trails throughout the Alafia reserves and walking is possible around the Christina Road Park.

D. Environmental Lands:

The nearest environmental lands are The Alafia Reserve, seven miles south of the site. The Alafia River Reserve was purchased jointly by Polk County and the Southwest Florida Water Management District. The 334-acre reserve was acquired to preserve the natural wetlands and uplands along the upper corridor of the Alafia River. Wading birds and amphibians that require seasonally-flooded areas free of predators to complete their life cycles call the Alafia River Reserve home. Forested hardwood wetlands are the primary natural community, and common trees include sweet gum, laurel oak, ironwood, hickory, sabal palms and bay. Ground cover is sparse due to extended periods of flooding. Visitors may hike and picnic on these lands. (Source: County Website).

E. Planned Improvements:

There are no planned improvements

Environmental Conditions:

A. Surface Water

The subject property has the highest elevation of slightly over 121 feet on the north end of the property adjacent to Medulla Road and slopes to the south to slightly over 107 feet.

B. Wetlands/Floodplains

The subject property does not contain any wetland areas. The south-west corner is located in Flood Zone A and considered an area Inundated by 100-yr Flooding. There are no special floodplain requirements necessary for the building permit submitted by the applicant. However, that may change if any development is proposed in the floodplain.

C. On-Site Soils

According to the United States Department of Agriculture-Soil Conservation Service, the subject property is approximately 69.9% Pomona Fine Sand, 30.1% Sparr sand, 0 to 5 percent slopes. Future development of the site will be subject to Section 2.303: "Soils" of the County's Comprehensive Plan (in conjunction with the Land Development Code) which requires all development to implement Best Management Practices based on the Department of Environmental Protection's (DEP) Florida Development Manual.

Table 7

Soil Name	Septic Tank Absorption Field Limitations	Limitations to Dwellings w/o Basements	Percentage of Site (approximate)
-----------	--	--	----------------------------------

Pomona Fine Sand (7)	Severe: wetness, percs slowly	Severe: wetness	40%
Sparr sand (14)	Severe: wetness, poor filter	Moderate: wetness	60%
<i>Source: United States Department of Agriculture Natural Resources Conservation Service, https://websoilsurvey.nrcs.usda.gov</i>			

D. Protected Species

According to the Polk Endangered Habitat Map of the Future Land Use Map Series (FLUMS), the subject site is partially within a one-mile radius of a protected animal and plant species sighting (*Source: the Florida Natural Areas Inventory of 2021*). This means that a certified environmentalist identified an endangered or protected animal(s) within one mile of the property during the survey period of the 2021 study. The proposed land use change request is not anticipated to have a significant negative impact upon endangered species (*See Section 2.209: Ecological Communities of the Comprehensive Plan and Section 660: Ecological Communities of the Land Development Code*).

E. PolkGreen Districts and Conservation Easements

The PolkGreen Map shows a portion of this parcel as part of a potential connection of an overall natural network. This site does not have a conservation easement, but the property directly south is within a conservation easement per the Polk County Property Appraiser’s website within the Morgan Creek Preserve development (OR 6108-886).

F. Archeological Resources

According to the Florida Department of State, Division of Historical Resources, there are no archeological or historical sites listed in the Florida Master Site File.

G. Wells

The subject site does not contain any wells on the property. There are no Wellhead Protection districts on the subject site or in proximity.

H. Airports

The subject site is located within the Lakeland Linder Regional Airport and South Lakeland Airpark Airport Impact District. The subject site is within the Height Notification Subzone 1 for both airports and the Piston Engine Powered Aircraft Bird Strike Hazard Zone for Lakeland Linder Airport. The subject site is partially within the In-Flight Visual Interference Zone identified on the County’s Airport Impact District Map. See Exhibit 9.

The City of Lakeland has expressed concern with this area changing from BPC to residential. See the attached letter from the City in Exhibit 7. The noise levels of the airport are expected to increase as the airport grows, which may be of concern to future residents of this area. The city is concerned about how more residentially designated areas will be designed if subdivisions are created. The City has asked that if this request is approved, the property owner be required to “to execute and record an Avigation Easement agreement similar to the attached sample instrument that is used for development activity within our jurisdiction.” This sample is provided under separate attachment.

The subject site is not in the direct zone of the runways. However, the Morgan Creek Subdivision to the south of the subject site in the City of Lakeland is within the Education Restriction Zone.

Economic Factors

Adjacent to the subject site is undeveloped, pasture, and residentially developed property within the BPC designation on the south side of Medulla Road including smaller lot sizes than on the north side of Medulla Road. The smaller lot sizes are not as conducive to warehouse distribution uses but can be accommodating to commercial vehicle parking uses due to the limited building needs. The applicant has spent money and is waiting to construct a home that can provide immediate investment in the County’s public services. However, developing the property with BPC uses can provide more support for County infrastructure and public safety services.

Consistency with the Comprehensive Plan and Land Development Code:

Many policies within the Comprehensive Plan are reviewed for consistency with an application. The most relevant policies for the proposed request are included in the staff report. The policy is first stated and then an analysis of how the request is provided to state that it may or may not be consistent with the Comprehensive Plan. The request is not consistent with the following policies of the Comprehensive Plan. The following policies were reviewed:

- POLICY 2.102-A1 – POLICY 2.102-A15: Growth Management
- Division 4.400 Glossary “Compatibility”
- Section 2.105 Urban-Growth Areas (UGA)
- Section 2.119 Residential

Table 9

Comprehensive Plan Policy	Consistency Analysis
<p>POLICY 2.102-A1-A15: GROWTH MANAGEMENT – <i>Polk County shall promote contiguous and compact growth through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.</i></p>	<p>The proposed request for a residential home is consistent with the development to the east and west of the subject site and south of Medulla Road. However, the request for RL continues to bifurcate the BPC and decrease the opportunity for coordinated development in the BPC south of Medulla Road.</p>
<p>POLICY 2.102-A1: DEVELOPMENT LOCATION - <i>Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.</i></p>	<p>There are residential homes to the east and west of the subject site within the BPC designation. Therefore, residential on the subject site is compatible with the adjacent uses. However, the RL designation in the middle of the BPC prevents separation between BPC uses and residential uses if the lots in the BPC develop according to the BPC entitlements. At full buildout of 25 units, the water needs, wastewater generation and AADT rates all decrease.</p>

Comprehensive Plan Policy	Consistency Analysis
	However, PM Peak Hour trips slightly rise.
<p>POLICY 2.102-A2: COMPATIBILITY - <i>Land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished:</i></p> <ul style="list-style-type: none"> a. <i>there have been provisions made which buffer incompatible uses from dissimilar uses;</i> b. <i>incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use;</i> c. <i>uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.</i> 	<p>The proposed request to change the FLU from BPC to RL is not compatible with the adjacent Future Land Use designation. However, all the developments south of Medulla Road is residential. Approval of this request will be similar to a spot zone as it would change the FLU in the middle of a BPC district.</p> <p>However, the Gresham Farms Village residential subdivision that includes 78 homes was constructed since the original Future Land Use designation request to RL on this subject site in 2020. Gresham Farms Village is within the City of Lakeland.</p>
<p><i>SECTION 2.119 RESIDENTIAL</i> <i>OBJECTIVE 2.119-A: The Polk County Plan shall establish residential land use categories in order to promote the appropriate quantities and distribution of residential densities in accordance with land use compatibility, sufficient quantities for demand, and public-facility and services impacts.</i></p>	<p>The Future Land Use change from BPC-1 to RL-1 would not meet the criteria of distribution of residential densities in accordance to land use compatibility.</p>
<p><i>POLICY 2.120-C3: LOCATION CRITERIA - Residential-Low areas shall be located only within the TSDAs, UGAs, SDAs, and UEAs and new Residential-Low development shall not be located within Activity Centers. The placement of Residential-Low shall be evaluated based on the general criteria listed in Policy 2.119-A2.</i></p> <p><i>POLICY 2.120-C4: DEVELOPMENT CRITERIA - Residential development may contain a variety of housing types as defined by the Land Development Code within the TSDA. Outside the TSDA, RL may contain single-family dwelling units, duplex units, small-scale multi-family units, and family-care homes, and shall be permitted, with County approval, at a density of up to, and including, 5 DU/AC. Additionally, community facilities may be allowed in accordance with policies of this Plan.</i></p>	<p>The Development Area is Urban Growth Area and RL is permitted in the UGA per Policy 2.105-A3.</p>

Comprehensive Plan Policy	Consistency Analysis
<p><i>POLICY 2.119-A2: LOCATION CRITERIA - Residential land use categories shall be established throughout the County with consideration being given to the following criteria:</i></p> <p><i>a. Access to county-maintained roads or roads constructed to County standards. b. Proximity to Activity Centers .c. Adequacy of water and sewage disposal systems (public and private). d. Adequacy and response time for public safety services - fire, police, and emergency medical service. e. Adequacy of recreation facilities. f. Proximity of incompatible land uses .g. Development limitations, and, h. Urban Sprawl Criteria set forth in POLICY 2.102-A10.</i></p>	<p>The subject site is appropriate for development as County Line Road directly accesses I-4 to the north and SR 60 to the south and is within one (1) mile of the subject site. In addition, there is a Publix shopping complex to the southwest of the site at the northeast corner of Pipkin Road and County Line Road about 1.8 miles from the subject site.</p>
<p><i>POLICY 2.119-A3: DEVELOPMENT CRITERIA - Residential development shall conform to the following criteria:</i></p> <p><i>a. BUFFERING: Buffering, when provided to lessen the impact and friction between residential and non-residential land uses, may take the form of physical barriers, such as walls, fences, berms, landscaping, open spaces, or other similar design features. b. DENSITY AND SCALE: New residential development, immediately adjacent to existing residential areas, should be designed so as to minimize any potential adverse impacts due to dissimilar densities or building scale. c. HOUSING TYPES: Residential structures may include all various types, such as: conventionally built single-family dwelling units; attached or detached units; zero-lot-line structures; factory-built modular units; mobile homes; duplexes; townhouses; and apartment complexes, provided they meet appropriate location standards and meet adopted building codes and construction standards. d. ACCESS TO STREETS: New residential development should have direct access to local streets, as specified in Policy 2.128-C3. Access to collector and arterial streets shall be provided by local streets at intervals meeting recognized safety standards. Private residential driveways should be discouraged on collector or arterial streets. e. INTERNAL CIRCULATION: Residential developments should be designed to provide for an efficient</i></p>	<p>When development switches frequently between a residential use and a non-residential use, it creates undue impacts to each. Section 220 of the LDC requires a 50-foot setback from a residential structure or residentially designated property line. The site plan for BR-2026-190 labels the west side setback as 32.2 feet and the east side setback from the proposed home as 34 feet. The side setback in BPC is 20 feet. Therefore, if the request is approved, the building setback for the parcels to the east and west will increase by 30 feet. But the 50-foot compatibility zone can be used for parking and retention. If a subdivision is constructed on the subject, buffers will be required on the east and west side of the subject site.</p>

Comprehensive Plan Policy	Consistency Analysis
<p><i>internal circulation system to include the provision of collector streets and adequate parking in accordance to the scale of the development.</i></p> <p>DENSITY COMPUTATIONS: <i>Polk County shall use gross densities when determining residential densities. Gross density is determined by dividing the total number of dwelling units on the site by the total area of the residential site, exclusive of water bodies. The area for computing gross density shall include all public and institutional land uses (e.g. internal streets, sewer plants, schools, parks, etc.) located within the site, as well as one-half of the right-of-way area for perimeter "local" streets, and one-fourth of the right-of-way area for perimeter local street intersections, for those areas not already owned by the public. In the Rural Development Area (RDA) and Suburban Development Area (SDA), outside of the Green Swamp Area of Critical State of Concern, one unit per five-acre (1 du/5ac) density may also be measured to the centerline of collector roads.</i></p>	
<p><i>Section 220 – Land Development Code Municode.com Generally described as development standards that “apply to all non-residential development within 50 feet of an existing residence or property designated as Agricultural/Residential Rural (A/RR), Residential Suburban (RS), Residential-Low (RL-1, RL-2, RL-3, RL-4), Residential-Medium (RM), Residential High (RH) or Rural Cluster Center-Residential (RCC-R) by the Future Land Use Map Series. Only the portion of the development within the 50-foot compatibility area shall be subject to the requirements of this Section.”</i></p>	<p>If approved, the RL will require non-residential uses on the properties to east and west of the subject property to set their buildings back 50 feet from the property line rather than just 50 feet from any residential structure. For example, there is a home in the BPC to the east of the subject site. Any non-residential structures constructed would have to be 50 feet from the home. But with RL the distance is measured from the property line of an RL designated parcel. The side setback in BPC is 20 feet.</p>

Urban Sprawl Criteria

The proposed RL-1 Future Land Use designation in the UGA for this area does not lend itself to urban sprawl. However, the following urban sprawl analysis is provided to fulfill statutory requirements. (Policy 2.102-A11)

<p align="center">Urban Sprawl Criteria:</p> <p>The following criteria are the primary indicators of urban sprawl.</p>	<p align="center">Page(s) referenced in this report</p>
<p>a. <i>Promotes substantial amounts of low-density, low-intensity, or single use development in excess of demonstrated need.</i></p>	<p align="center">Summary of Analysis, Compatibility with Surrounding Land Uses</p>

Urban Sprawl Criteria:	
The following criteria are the primary indicators of urban sprawl.	Page(s) referenced in this report
b. <i>Allows a significant amount of urban development to occur in rural areas.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
c. <i>Designates an urban development in radial, strip isolated, or ribbon patterns emanating from existing urban developments.</i>	Summary of analysis, surrounding Development, compatibility
d. <i>Fails to adequately protect and conserve natural resources and other significant natural systems.</i>	Environmental Conditions
e. <i>Fails to adequately protect adjacent agricultural areas.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
f. <i>Fails to maximize existing public facilities and services.</i>	Schools, Public Facilities and Water/Sewer Sections
g. <i>Fails to minimize the need for future facilities and services.</i>	Schools, Public Facilities and Water/Sewer Sections
h. <i>Allows development patterns that will disproportionately increase the cost of providing public facilities and services.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
i. <i>Fails to provide a clear separation between urban and rural uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
j. <i>Discourages infill development or redevelopment of existing neighborhoods.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
k. <i>Fails to encourage an attractive and functional mixture of land uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
l. <i>Will result in poor accessibility among linked or related land uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
m. <i>Results in the loss of a significant amount of open space.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses and Environmental Conditions

Comments from other Agencies:

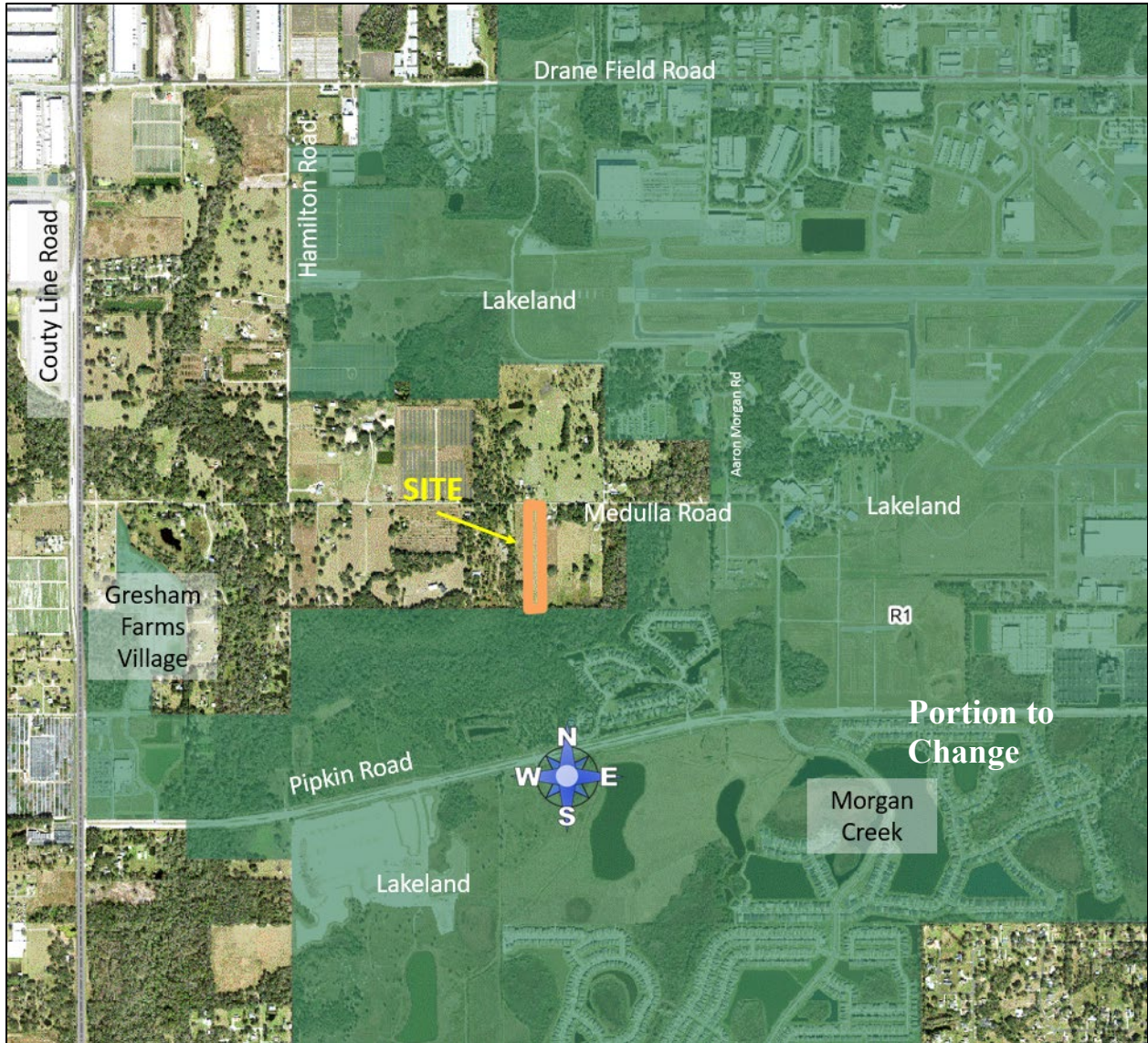
Letter from the City of Lakeland comment letter and Airport Layout Plan (Exhibit 7)
 Southwest Lakeland Sector Plan (Exhibit 7).

Exhibits:

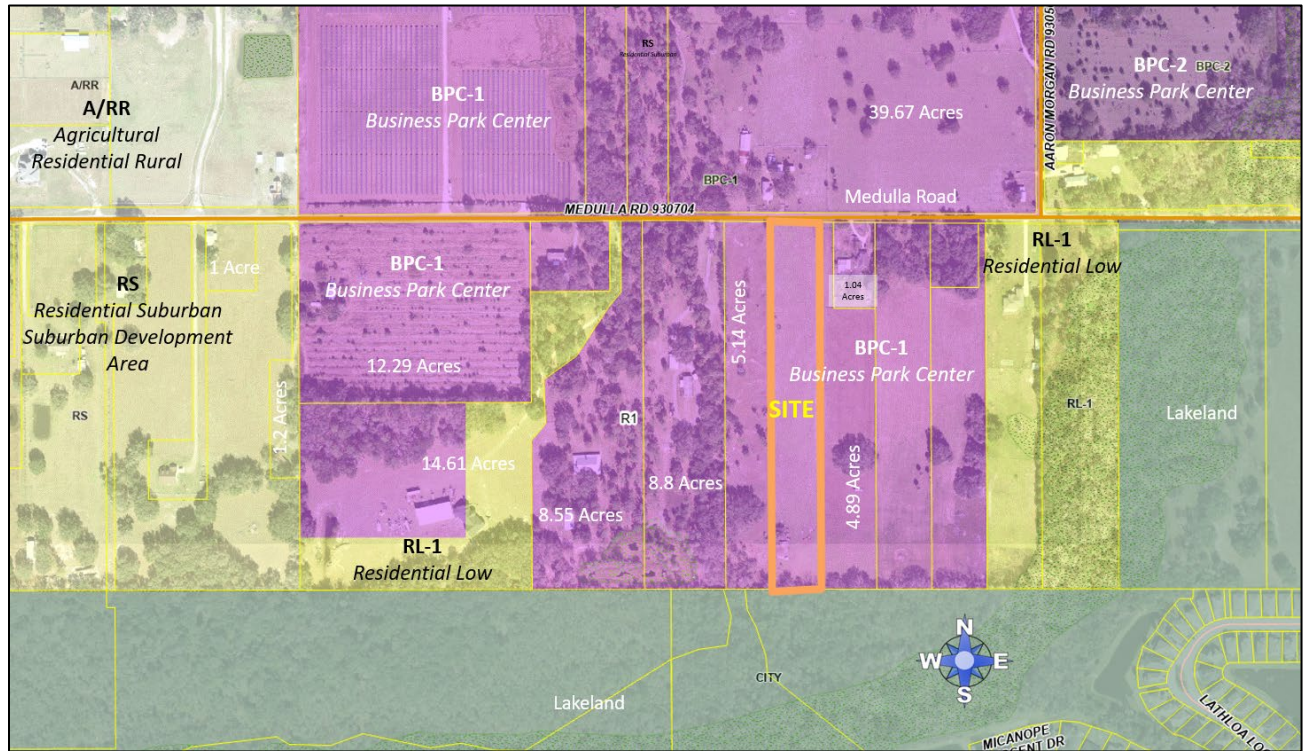
- Exhibit 1 Location Map
- Exhibit 2 Aerial Photograph (2023 Context)
- Exhibit 3 Aerial Photograph (2023 Close Up)
- Exhibit 4 Current Future Land Use Map
- Exhibit 5 Proposed Future Land Use Map
- Exhibit 6 List of Permitted and Conditional Uses
- Exhibit 7 City of Lakeland Letter dated April 20, 2026, and Airport Layout Plan 2025
- Exhibit 8 Southwest Lakeland Sector Plan
- Exhibit 9 Airport Impact District Map



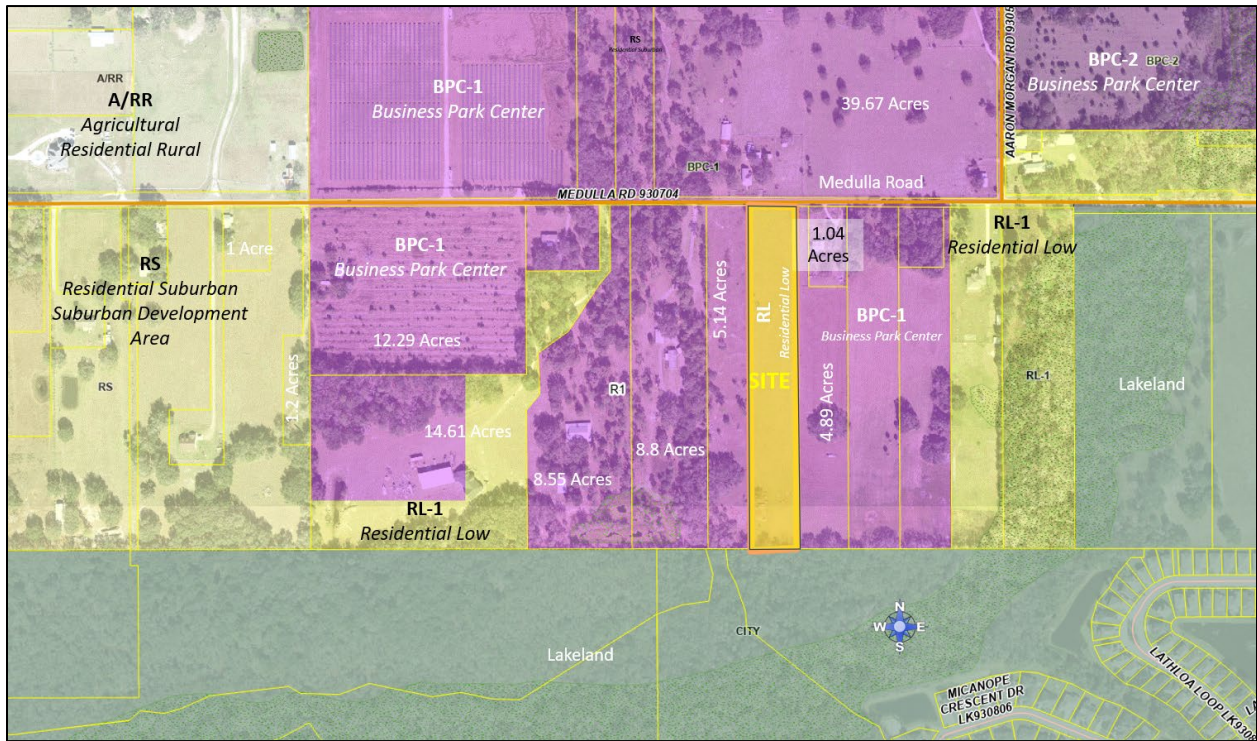
LOCATION MAP



**AERIAL PHOTOGRAPH
(2023 Context)**



CURRENT FUTURE LAND USE MAP BUSINESS PARK CENTER-1 (BPC-1)



PROPOSED FUTURE LAND USE MAP RESIDENTIAL LOW-1 (RL-1)

Land Use District	Technical Staff Review (P, C1, C2)	Public Hearing(s) Required
<p>Business Park Center (BPC-1) Current Future Land Use Designation</p>	<p>Alcohol Package Sales; Bars, Lounges, and Taverns; Cardboard & Shredded Paper Collection; Commercial Vehicle Parking, Communication Tower, Monopole; Community Center; Convenience Stores, Isolated; Cultural Facility; Farming General; Financial Institution; Financial Institution, Drive Through; Gas Station; Golf Course; Government Facility; Heliports; Helistops; Hotels and Motels; Manufacturing, Light; Medical Marijuana Dispensaries; Nurseries, Retail; Nurseries and Greenhouses; Office; Office Park; Personal Service; Printing & Publishing; Recreation, Passive; Religious Institution; Research & Development; Restaurant, Drive-thru/Drive-in; Retail, 10,000-34,999 sq. ft.; Retail, 35,000-64,999 sq. ft.; Retail, Less than 10,000 sq. ft.; School, Leisure/Special Interest; School, Technical/Vocational/Trade & Training; School, University; Self-Storage Facility; Studio, Production; Solar Electric-Power Generation Facility; Transit, facility; Utilities, Class I; Utilities, Class II; Warehouse/Distribution</p>	<p>Multi-Family; Planned Development; Transitional Area Development; Agricultural Support, Off-site; Airport; Animal Farm, Intensive; Communication Tower, Guyed and Lattice; Lime Stabilization Facility; Mining, Non-phosphate; Power Plants Non-Certified, Low; Retail, More than 65,000 sq. ft.; Utilities, Class III; Water Ski Schools; Airport;</p>
<p>Residential-Low-1 (RL-1) Proposed Future Land Use</p>	<p>Group Home, Small (6 or less residents); Mobile Homes, Individual; Residential Infill; Single-family Detached Home & Subdivision; Animal Farm, Intensive; Emergency Shelter, Small (6 or less residents); Farming General; Golf Course; Livestock Sale, Auction; Nurseries and Greenhouses; Recreation, Passive; Recreation, Low Intensity; School, Elementary; School, Middle; Utilities, Class I; Utilities, Class II</p>	<p>Duplex, two-family attached; Group Living Facility (7-14 residents); Group Living Facility (15 or more residents); Mobile Home Park & Subdivision; Multi-family; Short-Term Rental Unit; Planned Development; Residentially Based Mixed Development (RBMD); Transitional Area Development; Adult Day Care Center (7 or more clients); Agricultural Support, Off-Site; Bed and Breakfast; Childcare Center; Communication Towers, Guyed and Lattice; Communication Tower, Monopole; Community Center; Cultural Facility; Emergency Shelter, Large (15 or more residents); Government Facility; Helistops; Mining, Non-Phosphate; Recreation, High Intensity; Recreation, Vehicle Oriented; Religious Institution; Riding Academies; School, high; School, Leisure/Special Interest; Utilities, Class III</p>



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Email: charles.barmby@lakelandgov.net

April 20, 2026

Transmitted via E-Mail

Chanda Bennett, AICP, CPM
Comprehensive Planning Administrator
Polk County Land Development Division
Post Office Box 9005 – Drawer GM03
Bartow, Florida 33831-9005

**Subject: Polk County Case File #LDCPAS-2026-11
(Parcel ID NO. 232908-000000-033040)**

Dear Ms. Bennett:

The City of Lakeland received notification of the above referenced case and submits the following comments for your consideration.

Although the 2008 Southwest Lakeland Sector Plan identifies the subject property as being within an area intended for future "cluster-style residential development," the dimensions of the subject property would only allow for a conventional subdivision laid out in a linear pattern with lots on only one side of the street. Provision of City services would necessitate a utility services agreement and subsequent annexation. As such, development of the property in this manner would be inconsistent with the connectivity provisions of the City's Land Development Code and the goals and policies of the City's Comprehensive Plan.

Since the Sector Plan was completed, the City's long-term vision for Lakeland International Airport has evolved and resulted in a new master plan. With the construction of the Amazon logistics center, plans for a second runway, parallel to and south of Runway 9/27 (see attached draft Airport Layout Plan), and the commencement of passenger airline service, the airport is poised for strong growth with additional flight operations. Furthermore, the Airport approved a Terminal Area Master Plan in 2025 with four sole domestic gates and one international-capable gate in addition to Advanced Air Mobility facilities. As such, any allowance for residential development off of Medulla Road at suburban densities will be a recipe for conflict once the new runway is completed. If this land use change is ultimately approved, the City requests that the property owner be required to execute and record an Avigation Easement agreement similar to the attached sample instrument that is used for development activity within our jurisdiction.

The application of County RL-1 land use would be inconsistent with adjacent properties to the north, east and west which are uniformly designated BPC-1. More importantly, encouraging additional residential in proximity to the Airport will create conflicts between

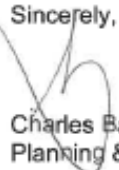
CITY OF LAKELAND LETTER & AIRPORT LAYOUT PLAN

Ms. Chanda Bennett
April 20, 2026
Page Two

land uses as a result of the known impacts generated by the Airport and will hinder the Airport's growth and future business park development.

The City of Lakeland appreciates the opportunity to comment on this request. Please contact me at 834-6028 if you should have any questions or concerns regarding these comments.

Sincerely,



Charles Bamby, AICP CTP
Planning & Transportation Manager

Enclosures

cc: Teresa Maio, AICP, Assistant Director of Community Development
Adam Lunn, C.M., ACE, Airport Assistant Director

**CITY OF LAKELAND LETTER
& AIRPORT LAYOUT PLAN (DRAFT)**

The **Southwest Lakeland Sector Plan** is the first of nine such plans being developed as a part of a City of Lakeland sector planning initiative. Sector Planning involves "organized brainstorming" to develop preferred scenarios for future growth and redevelopment. Sector Plans will be used to help make land use decisions, update the Comprehensive Plan, identify Capital Improvement needs, formulate redevelopment strategies, and identify the need for additional studies and plans.



Although the sector boundaries extend into the county, Sector Plans will have no legal force over property that is in the county and does not have city water or wastewater. However, Lakeland must plan ahead to avoid land use conflicts and assure that public improvements are coordinated.



Beginning in the Spring of 2007, the planning staff held a series of meetings with internal departments, surrounding local governments, and other outside agencies to identify the major planning issues. To solicit public input, staff conducted a Community Planning Workshop in November 2007 at Bruce Wagner Elementary School. To augment this effort, staff later conducted a similar workshop for city employees who live in the sector. Workshop participants identified what they felt were the most important issues facing this sector and took part in a map exercise in which they envisioned the future of the sector in 2030. Staff also produced a community survey that was distributed in person and posted on-line.



SOUTHWEST LAKELAND SECTOR PLAN

CURRENT CONDITIONS & TRENDS

The Southwest Lakeland Sector remained largely rural until the 1980s and 1990s when it began to suburbanize and industrial and warehouse developers seeking quick access to I-4 began building along County Line Road. With the opening of the Polk Parkway, industrial, office and warehouse development accelerated. After 2000, developers of large-

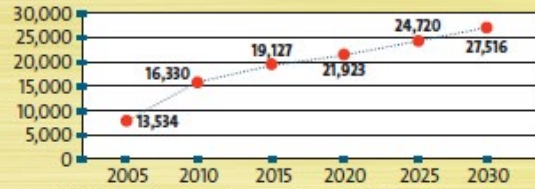
scale housing projects sought zoning approvals for much of the remaining land, especially south of the airport.

By 2030 the sector will need to accommodate nearly twice the current number of people. Although about 40 percent of the land is still vacant and agricultural land, approved but unfinished projects account for a significant portion of the remaining buildable land.

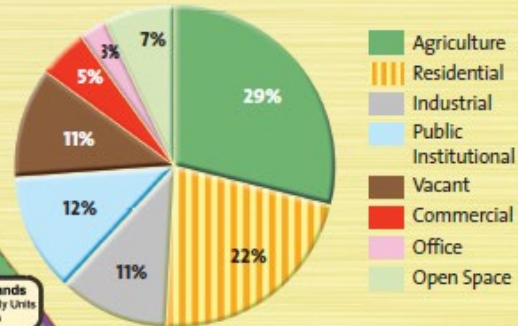
DEVELOPMENT TIMELINE

- 1942: DRANE FIELD CONSTRUCTED BY US AIR FORCE
- 1958: CITY OF LAKELAND ASSUMES CONTROL OF AIRPORT
- 1981: COLONNADES DEVELOPED
- 1993: PUBLIX WAREHOUSE ON COUNTY LINE ROAD DEVELOPED
- 1993: BREED AUTOMOTIVE PLANT DEVELOPED
- 1997: CARILLON LAKES DEVELOPED
- 1998: GEICO REGIONAL HEADQUARTERS DEVELOPED
- 1999: POLK COUNTY PARKWAY OPENS
- 1999: ROOMS TO GO WAREHOUSE DEVELOPED
- 2001: PUBLIX SUPER MARKETS HEADQUARTERS DEVELOPED
- 2002: WEST PIPKIN ROAD EXTENSION TO COUNTY LINE ROAD OPENS
- 2003-2007: 2,400 SINGLE FAMILY HOMES APPROVED
- 2006: SOUTHERN WINE AND SPIRITS DEVELOPED
- 2008: LAKELAND CENTRAL PARK DRI APPROVED

PROJECTED POPULATION GROWTH

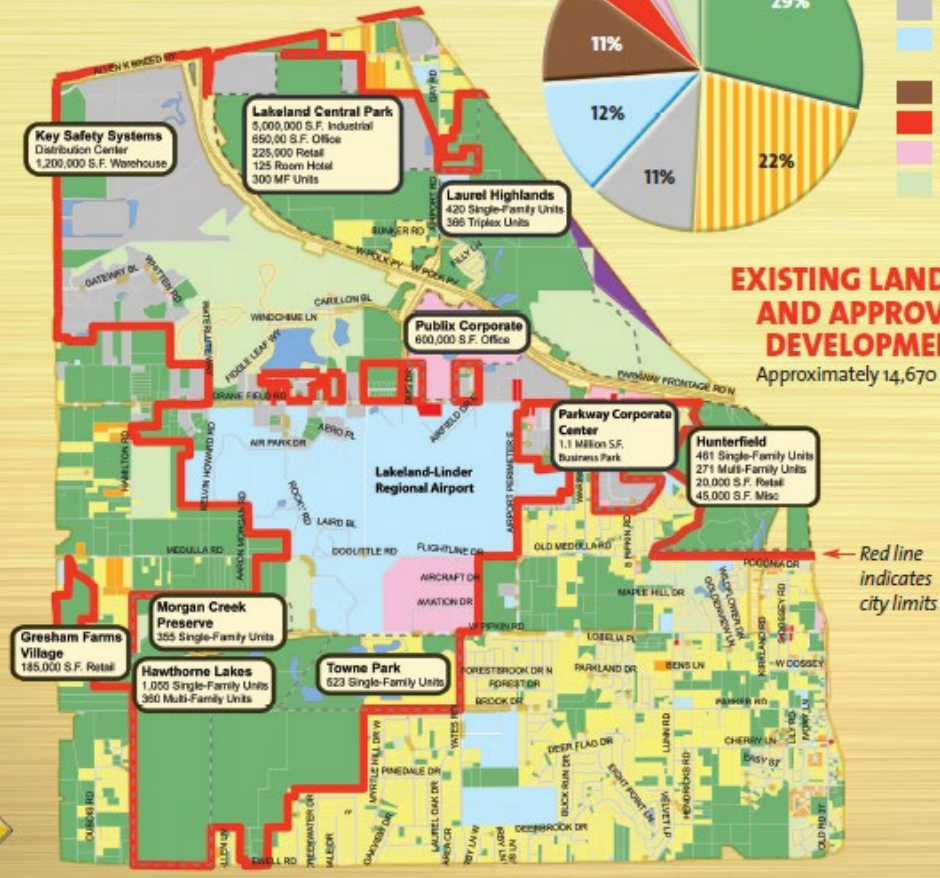


EXISTING LAND USES



EXISTING LAND USE AND APPROVED DEVELOPMENT

Approximately 14,670 acres



SOUTHWEST LAKELAND SECTOR PLAN

OUTCOMES

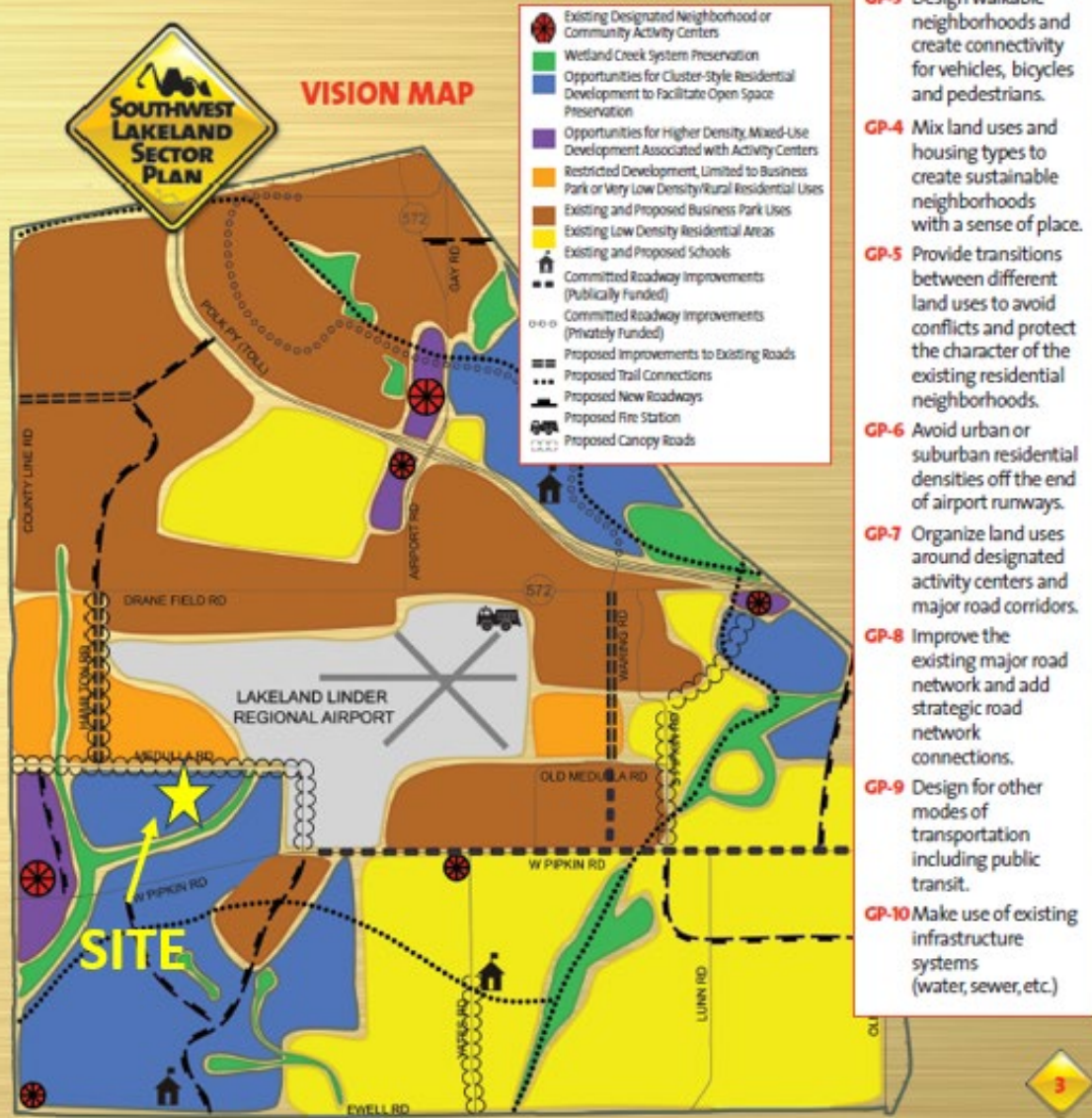
Three work products were created: A *Vision Map* that graphically portrays the preferred growth pattern, a set of *Guiding Principles* to help direct future action, and a set of *Implementation Strategies* including a list of capital improvement needs.

Existing and approved development will largely determine the land use pattern for the foreseeable future. The airport has a big influence on the type and location of land uses

in this sector. In general, the area north of the airport is trending to industrial and business park uses and the area south of the airport is trending to low and very low density single family residential uses. To the extent that infrastructure can be made available, continued urban growth is likely in this sector, although the pace and magnitude of that growth remain to be seen. Future development is constrained by creeks and areas of wetlands and it lacks a well defined network of collector streets.

GUIDING PRINCIPLES

- GP-1** Allow increases in density where appropriate.
- GP-2** Cluster development and avoid wetlands/floodplains to preserve open space and create amenities.
- GP-3** Design walkable neighborhoods and create connectivity for vehicles, bicycles and pedestrians.
- GP-4** Mix land uses and housing types to create sustainable neighborhoods with a sense of place.
- GP-5** Provide transitions between different land uses to avoid conflicts and protect the character of the existing residential neighborhoods.
- GP-6** Avoid urban or suburban residential densities off the end of airport runways.
- GP-7** Organize land uses around designated activity centers and major road corridors.
- GP-8** Improve the existing major road network and add strategic road network connections.
- GP-9** Design for other modes of transportation including public transit.
- GP-10** Make use of existing infrastructure systems (water, sewer, etc.)



SOUTHWEST LAKELAND SECTOR PLAN

IMPLEMENTATION STRATEGIES

Capital Improvements

- 1 Seek to include the identified capital improvement needs in the CIP (Capital Improvements Projects Table, GP-8, 10).
- 2 Seek appropriate park sites in accordance with the city's Parks and Recreation Master Plan (GP-2).

Annexation

- 3 Seek to eliminate enclaves and to "square off" the city limits as opportunities present themselves.

Land Use/Zoning

- 4 Use the Vision Map and Guiding Principles to support appropriate future land use and zoning changes (Vision Map, GP-7).

Regulations

- 5 Establish regulations and developer incentives in order to create sustainable neighborhoods with a sense of place (GP-2,4).
- 6 Prohibit residential structures within 500 feet of existing industrial zoning (GP-5).

- 7 Require Avigation Agreements for all new residential developments in the Southwest Sector (GP-5, 6).
- 8 Establish design-based zoning regulations incorporate best design practices and that acknowledge differences between various "design districts" (GP-2, 3, 4).
- 9 Require strategic pedestrian connections to adjacent land uses (GP-3, 9).
- 10 Establish an access management plan for the County Line Road corridor; in cooperation with Polk County, Hillsborough County and Plant City (GP-8).
- 11 Require property that is newly annexed or seeking a change in use to petition for annexation into the appropriate mass transit district (GP-9).
- 12 Consider a Canopy Road program and use the Vision Map as a starting point for designating segments of canopy roads (GP-5).

PROPOSED CAPITAL IMPROVEMENT PROJECTS

TRANSPORTATION IMPROVEMENTS

Project Name	Schedule	Status	Planned/Committed
City of Lakeland Projects			
Waring Road Extension: Old Medulla to West Pipkin	2008-2009	ROW acquisition underway	Planned/Committed
Polk County Projects			
County Line Rd Phase I: West Pipkin to Ewell	2008-2009	ROW acquisition underway	Committed
Harden (Old 37) Realignment at West Pipkin	2008-2009	Design underway	Committed
County Line Rd Phase II: Ewell to SR 60	2009-2010	Design underway	Committed
W. Pipkin Widening: Medulla to W. Dossey	2010-2011	Design underway	Planned
Ewell Widening: County Line to SR 37	2014-2015	ROW and design only	Planned
Developer Contribution Projects			
Laurel Park Blvd: N. Pkwy Frontage to Airport	2008-2009	Design underway	Committed
Laurel Park Blvd: Airport to Old Tampa Hwy	TBD	Design underway	Planned
Airport Rd Widening: Old Tampa Hwy to Parkway	TBD	Design underway	Planned
County Line Center Backage Road	TBD	Design underway	Planned
Hawthorne Mill North-South Connector: Ewell to Pipkin	TBD	Design underway (alignment incomplete)	Planned
Florida DOT Projects			
North-South Rte (SR563): SR 37 to Pipkin	TBD	ROW acquired, Unfunded need	Planned
New Tampa (US 92) Widening: County Line to Wabash	TBD	Unfunded need	Planned
Sector Plan Proposed Projects			
Hamilton Road widening	TBD	TBD	TBD
Gateway Blvd/Hamilton Road Extension	TBD	TBD	TBD
Ariana St Extension to Airport Road	TBD	TBD	TBD

FIRE SERVICE IMPROVEMENTS

Project Name	Schedule	Status	Planned/Committed
City of Lakeland Projects			
Station No. 7	TBD	Study underway	Planned

PARKS & RECREATION IMPROVEMENTS

Project Name	Schedule	Status	Planned/Committed
City of Lakeland Projects			
3 Neighborhood Parks and 1 Community Park	TBD	Unfunded and not located	Planned

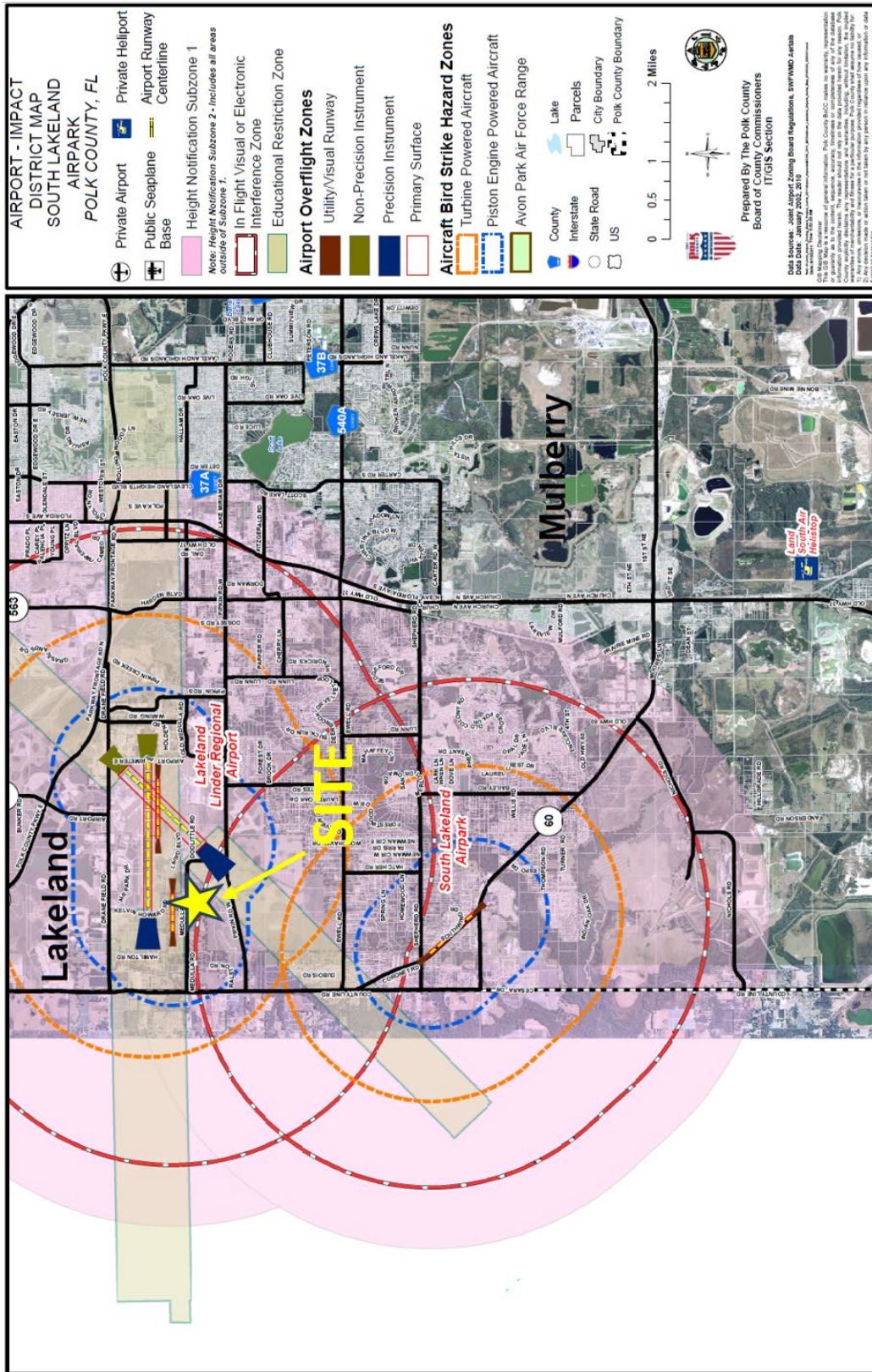
WASTE WATER IMPROVEMENTS

Project Name	Schedule	Status	Planned/Committed
City of Lakeland Projects			
Pump and Airpark Upgrade (Eng Oaks II)	2007-2008	Zoning/land use review	Committed
Upgrade Existing Pump Station (Eng. Oaks II)	2007-2008	Zoning/land use review	Committed
Utility Relocation US 92 –Airport Road to In-town	2009-2010	Project Underway	Committed
Utility Relocation – West Pipkin, Medulla to Harden	2009-2010	Project Underway	Committed
Southwest Force Main Replacement	2008-2009	Project Underway	Committed
Utility Relocation – SR 563 Parkway to Pipkin	2011-2012	Projected	Planned
Utility Relocation – Business 92 Airport Road to InTown	2010-2011	Projected	Planned



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Summer 2008

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AIRPORT IMPACT DISTRICT MAP LAKELAND LINDER AND SOUTH LAKELAND AIRPARK