

July 5, 2023

Polk County Planning and Development
330 W. Church St.
Bartow, FL 33830

Reference: Ronald Reagan Parkway – Comprehensive Plan Amendment
Demonstration of Need and Impact Assessment Statement Form
Parcel ID: 27-26-05-000000-031020
FEG Project No. 22-016

The following provides an analysis related to POLICY 2.102-A11: URBAN SPRAWL CRITERIA, which is required in accordance with Rule 9J-5.006(5) of the Florida Administrative Code. This analysis demonstrates that the proposed ECX Land Use plan amendment does not result in urban sprawl by addressing the required criteria as outlined below:

- a. Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need.

Response: The proposed ECX Land Use plan amendment will facilitate the development of the site within the Ronald Reagan Parkway Selected Area Plan and is consistent with the development trend in the area. The proposed Multi-Family and Accessory Retail Land Uses would provide support for office workers, residents, and visitors and is contemplated in response to market needs.

- b. Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while leaping over undeveloped lands which are available and suitable for development.

Response: The proposed ECX Land Use would support nearby development such as Champions Gate and Loma Vista and would not leap over undeveloped lands which are available and suitable for development.

- c. Promotes, allows or designates urban development in radial, strip isolated or ribbon patterns generally emanating from existing urban developments.

Response: The proposed plan amendment would allow development of vacant lands fronting a principal arterial within a growth area and would support existing development in the area.

- d. As a result of premature or poorly planned conversion of rural land to other uses, fails to adequately protect and conserve natural resources, such as, wetlands, floodplains, native vegetation, environmentally sensitive areas, natural shorelines, beaches, bays, estuarine systems, and other significant natural systems.

Response: The proposed plan amendment protects jurisdictional wetlands and other natural elements by limiting development to the upland area and preserving all the jurisdictional wetlands. Specifically, the total site area is 58.36 acres, and only 1.92 acres are proposed for development. The wetland limits as shown in the submittal have been delineated and approved by the Southwest Florida Water Management District (SWFWMD).

- e. Fails to adequately protect adjacent agricultural areas and activities including silviculture and active agricultural and silvicultural activities as well as passive agricultural activities and dormant, unique and prime farmlands and soils.

Response: The site area is not suitable for agricultural and silvicultural activities given that it fronts a major principal arterial and is limited in size. Also, there are no adjacent agricultural or silvicultural areas or activities.

- f. Fails to maximize use of existing public facilities and services.

Response: The Land Use plan will utilize existing public roadway and utility infrastructure.

- g. Fails to minimize the use of future public facilities and services.

Response: The proposed plan amendment would not require any new public facilities or services, since there are adequate public roadways, utilities, and other infrastructure needed for the proposed site.

- h. Allows for land use patterns or timing which will disproportionately increase the cost in time, money and energy, of providing public facilities and services including roads, potable water, sanitary sewer, stormwater management, law enforcement education health care, fire and emergency response, and general government.

Response: The proposed ECX Land Use plan amendment would not require any new public facilities or services, since there are adequate public roadways, utilities, and other infrastructure needed for the proposed site. Furthermore, the proposed development will provide on-site stormwater management facilities. The site is located within a growth area and the proposed Land Use is consistent with the development trends and the adjacent Land Use designation on the north side of Ronal Reagan Parkway.

i. Fails to provide a clear separation between urban and rural uses.

Response: The proposed plan amendment would extend the proposed land use of ECX to the south and southwest and would complement nearby urban development such as Champions Gate and Loma Vista.

j. Discourages or inhibits in-fill development or redevelopment of existing neighborhoods and communities.

Response: The proposed plan amendment would support development of vacant lands that front Ronald Reagan Parkway and would not inhibit in-fill developments.

k. Fails to encourage an attractive and functional mix of land uses.

Response: The proposed plan amendment facilitates the development and growth of the Ronald Reagan Parkway Selected Area Plan and provides support for office workers, residents, and visitors. The proposed ECX Land Use would allow for an attractive and functional mix of uses.

l. Results in poor accessibility among linked or related land uses.

Response: The proposed plan amendment would support the existing growth and nearby development and would not affect accessibility among linked land uses. The site is, however, restricted by the surrounding wetlands, which are being preserved.

m. Results in the loss of a significant amount of functional open space.

Response: The proposed plan amendment would not result in the loss of a significant amount of functional open space as it would be a minor development of existing vacant land, which would also preserve significant wetland areas. Specifically, the total site area is 58.36 acres, and only 1.92 acres are proposed for development. The wetland limits as shown in the submittal have been delineated and approved by the Southwest Florida Water Management District (SWFWMD).

I trust that the above answers provide adequate justification for the requested ECX Land Use change. Should you have any questions or concerns, please do not hesitate to contact me at 407-895-0324 or by email at SSebaali@feg-inc.us.

Sincerely,
Florida Engineering Group, Inc.

Sam J. Sebaali, P.E., LEED®AP
President

cc: Suketu Patel, President, J&T Estates Inc



5127 S. Orange Avenue, Suite
200 Orlando, FL 32809
Phone: 407-895-0324
Fax: 407-895-0325

