



May 7, 2026

Polk County Board of County Commissioners
Land Development Division
330 West Church Street
Bartow, FL 33831-9005

Re: Smale-scale Comprehensive Plan Amendment (CPA)
Development Area Map Amendment
Impact Assessment Statement (IAS) Narrative
2925 Pavers Road Industrial Storage Yard
LDCPAS-2026-12_2925 Pavers Road Industrial Storage Yard
2925 Pavers Road, Lakeland, FL 33803 (Parcel ID: 24-28-35-000000-012030)

To Whom it May Concern,

Madrid Engineering Group, Inc., dba Madrid CPWG/Madrid CFTL, is pleased to present this narrative in support of the proposed small-scale Polk County comprehensive plan amendment (CPA). The Owner, Visions of Lakeland LLC, proposes changing a portion of the parcel of land located at 2925 Pavers Road, Lakeland, Florida, from the Rural Development Area (RDA) to Urban Growth Area (UGA). The subject parcel is currently within both the UGA and RDA development areas. The northern portion of the site is within the UGA and the southern portion of the site is within the RDA. The parcels to the west are within the Transit Supportive Development Area (TSDA) and UGA. Parcels to the north and (north)east are within the UGA, while the south and east contiguous parcels are within the RDA.

The total parcel of land is 58.91 acres. The proposed small-scale CPA would remove 38.22 acres of RDA from the parcel and convert to UGA to unify the parcel. Therefore, the total area of the map amendment is under the 50-acre threshold for small-scale CPAs.

The northern portion of the site is located within the Transit Corridor and Centers Overlay (TCCO) but outside the Transit Supportive Development Area (TSDA). The site is not located within the Green Swamp Area of Critical State Concern or any other Selected Are Plans (SAPs) or Special Protection Areas (SPAs).

The Owner is potentially selling the property and the potential buyer is looking to construct an Industrial Storage Yard. The subject parcel has a land use designation (zoning) of Industrial (IND). The proposed Development Area map amendment (under the small-scale CPA) will allow the current and potential owner to increase the developable area of the property, consistent with the Polk County Land Development Code (LDC) use regulations for the IND Land Use District. Currently, as the site lies in a portion of the RDA, the site is restricted to 50% maximum impervious area. The maximum impervious would increase to 75% based on the land use designation of IND, with removing the RDA from the site.

AT THE READY

2030 State Road 60 East
Bartow, FL 33830
P: 863.533.9007

8770 133rd Avenue North
Largo, FL 33773
P: 727.572.9797

The potential owner is proposing to utilize the parcel for Industrial Outdoor Storage (IOS) with potential for future warehouse buildings. The current concept site plan is below the 75% maximum threshold for IND land use district and will conform to the LDC Section 220 Compatibility standards. Also, based on the proposed use, the site will conform to the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category.

As part of the purchase agreement, the potential owner will purchase the surrounding private roadway system including Sandyway Lane, Security Lane, Ridgeway Lane and Pavers Road from Maine Avenue to the site. Pavers Road will be upgraded to ensure adequate access to the site is provided. The current concept site plan shows approximately 40 acres of proposed asphalt development for the storage yard. The remaining parcel area will be utilized as stormwater management area, wetland impact minimization, landscaping and related buffering.

The proposed stormwater system will provide adequate nutrient removal (80% reduction in phosphorus and nitrogen) and will be comprised of both dry retention and wet detention (treatment train). The outfall will mimic the existing site where discharge is conveyed from the north end of the site and is discharged to the south.

The project does not propose any structures at this time, but there is the potential for several future warehouse buildings. The concept site plan shows 44,000 sf of potential warehouse space. Utilities will be provided by Florida Governmental Utility Authority (FGUA). The subject property is directly adjacent to the current FGUA service area and therefore, FGUA is expanding their service area to include the subject parcel as the FGUA service boundary only extends to the adjacent property to the east. There is an existing water main along Pavers Road to be utilized for development. Sanitary sewer may need to be extended to Maine Avenue by forcemain or gravity main extension.

LDC Section 910 – Impact Assessment Statements

The below information and responses (*identified in italics*) are provided for each subsection of 910 to provide information on the effects of the proposed development (and land use action) will have on the existing neighborhood and general area; on the transportation facilities; on the environment and natural resources of the County; on the public facilities for water, sewer, solid waste disposal, fire, police, public education, parks, recreation, and other utilities; and any other aspect with an identified impact of the development and deemed appropriate for concern.

A. Land and Neighborhood Characteristics

To assess the compatibility of the requested land use district with the adjacent property and to evaluate the suitability of the site for development, the applicant shall:

1. Show how and why the site is suitable for the proposed uses;

The parcel was originally utilized as a phosphate mining facility in the 1940s. Then the site remained vacant and was utilized as a borrow pit for the adjacent Polk Parkway constructed in the late 1990s.

The site has remained vacant and is identified as Vacant Industrial (Code 4001) per the property appraiser website.

The proposed Urban Growth Area (UGA) development area is consistent with the surrounding areas due to its location. The applicant requests the UGA be applied to the entire site which would result in 38.22 acres of RDA being removed through the small-scale CPA and map amendment.

The northern portion of the site is within the UGA and the southern portion of the site is within the RDA. The parcels to the west are within the Transit Supportive Development Area (TSDA) and UGA. Parcels to the north and (north)east are within the UGA, while the south and east contiguous parcels are within the RDA. All land adjacent to the property is currently vacant, besides the two (2) parcels at the northeast corner which currently are developed for industrial activities.

The proposed storage yard use is consistent with the allowable uses within the IND land use district but will need to conform to the recently adopted storage yard land use criteria.

2. Provide a site plan showing each type of existing and proposed land use;
Refer to Map F for site plan showing existing and proposed land use.

3. Describe any incompatibility and special efforts needed to minimize the differences in the proposed use with adjacent uses;

The site is adjacent to Agricultural/Residential Rural (A/RR) land use designation to the south and partially on the east side. Additional landscape buffers, setbacks and fencing will be provided for the proposed storage yard to minimize impacts to the surrounding land uses. The site will conform to the LDC Section 220 Compatibility standards and the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category. The most stringent requirements will be utilized for site design.

4. Explain how the requested district may influence future development patterns if the proposed change is located in an area presently undeveloped;

The requested map change for the RDA delineation revision would not influence development patterns in the area as the surrounding parcels are within the UGA or TSDA. The area to the south and east within the RDA is vacant and is surrounded by TSDA and UGA development areas on all sides but its east side.

5. Describe each of the uses proposed in a Planned Development and identify the following:

The proposed development is not located within a planned development. Therefore, the items below are not applicable.

- a. The density and types of residential dwelling units;
N/A, no residential dwellings (and not within planned development)
- b. The type of commercial and industrial uses;
N/A, not within planned development but the industrial outdoor storage use will consist of asphalt storage yard and potential future warehousing.
- c. The approximate customer service area for commercial uses;
N/A, no customer service areas proposed.
- d. The total area proposed for each type of use, including open space and recreation.

N/A, not within planned development but the proposed use is not anticipated to encompass more than 75% of the site.

B. Access to Roads and Highways

To assess the impact of the proposed development on the existing, planned and programmed road system, the applicant shall:

1. Calculate the number of vehicle trips to be generated daily and at PM peak hour based on the latest ITE or provide a detailed methodology and calculations;

Based on the current concept site plan and 44,000 sf of potential future warehousing buildings, the total daily trips is 157, with PM peak hour trips of 14.

2. Indicate what modifications to the present transportation system will be required as a result of the proposed development;

No required modifications to the existing transportation system are required at this time. Though improvements to the privately owned Pavers Road will be proposed.

3. List the total number of parking spaces and describe the type of parking facilities to be provided in the proposed development;

The proposed development is not proposing parking spaces or parking facilities at this time. The future warehouses will provide adequate parking space counts for each building, including required landscaping and ADA spaces.

4. Indicate the proposed methods of access to the existing public roads (e.g., direct frontage, intersecting streets, frontage roads);

Site access will be provided by direct access to the existing driveway connection to Pavers Road. Pavers Road is within the subject property but there is an existing 60' access easement in place. The potential owner would update Pavers Road and provide the required 50' radii per County Ordinance No. 2026-023 regarding Storage Yards. As part of the purchase agreement, the potential owner will purchase the surrounding private roadway system including Sandyway Lane, Security Lane, Ridgeway Lane and Pavers Road from Maine Avenue to the site. Pavers Road will be upgraded to ensure adequate access to the site is provided.

5. Indicate the modes of transportation, other than the automobile, that have been considered (e.g., pedestrian, bicycle, bus, train or air) and describe the modes.

The parcel is within a rural area located outside City of Lakeland City limits. There are no bus routes within close proximity to the project. The proposed storage facility will not produce any additional pedestrian or bicycle traffic. Therefore, no proposed sidewalks or pedestrian access are proposed with the project. However, bicycle parking may be provided if required.

C. Sewage

To determine the impact caused by sewage generated from the proposed development, the applicant shall:

1. Calculate the amount of sewage in gallons per day (GPD) expected to be generated by the proposed development;

The proposed development will not generate any sewage flows at this time but the future warehouse buildings as currently shown may produce 1,580 gpd of sewage flow.

2. Describe the proposed method and level of treatment, and the method of effluent disposal for the proposed sewage treatment facilities if on-site treatment is proposed;
The future development can connect to FGUA existing facilities. Sanitary sewer may need to be extended to Maine Avenue by forcemain or gravity main extension. However, per FGUA, the existing service may be extended down Pavers Road with on-going construction projects. The potential project is currently being reviewed by FGUA.
3. Indicate the relationship of the proposed sewage system to Polk County's plans and policies for sewage treatment systems;
Polk County's plans and policies will be met by connecting to central, public sanitary sewer systems to be provided by FGUA.
4. Identify the service provider;
Florida Governmental Utility Authority (FGUA).
5. Indicate the current provider's capacity and anticipated date of connection.
Capacity will be determined by FGUA. Connection is approximately one year out.

D. Water Supply

To determine the amount of water to be used, how it will be distributed, and the impact on the surrounding area, the applicant shall:

1. Indicate the proposed source of water supply and, the type of treatment;
There is an existing watermain located along Pavers Road.
2. Identify the service provider;
Florida Governmental Utility Authority (FGUA).
3. Calculate the estimated volume of consumption in gallons per day (GPD);
The proposed development will not generate any sewage flows at this time but the future warehouse buildings as currently shown may produce 1,817 gpd of water flow.
4. Indicate the current provider's capacity and anticipated date of connection.
Capacity will be determined by FGUA. Connection is approximately one year out.

E. Surface Water Management and Drainage

To determine the impact of drainage on the groundwater and surface water quality and quantity caused by the proposed development, the applicant shall:

1. Discuss the impact the proposed development will have on surface water quality;
The proposed stormwater system will provide water quality treatment via on-site retention/detention volume for adequate nutrient removal (80% reduction in phosphorus and nitrogen) and will be comprised of both dry retention and wet detention (treatment train). The water quality treatment will be a net improvement for the surface water discharging from the site.
2. Describe the alteration to the sites natural drainage features, including wetland, that would be necessary to develop the project;
The existing site contains several wetlands and surface water bodies. The parcel was originally utilized as a phosphate mining facility in the 1940s and then as a borrow pit for the adjacent Polk Parkway constructed in the late 1990s. The excavation activities removed roughly 900,000 cubic yards of soil for the Polk Parkway construction. This excavation created low-quality wetlands over the past 25 plus

years. The proposed site alterations will fill in most of the man-made wetlands which will be mitigated through mitigation bank credits.

Approximately 13.8 acres north of Polk Parkway is conveyed under Polk Pkwy through a 30" and 24" storm drain. This flow will be accounted for in the overall site design. No additional off-site stormwater runoff is conveyed to the site due to existing berms. The outfall will mimic the existing site where discharge is conveyed from the north end of the site and is discharged to the south.

The site does contain some floodplain, FEMA flood zone "A" per panel no. 12105C0320G (effective date 12/22/2016). Floodplain compensation will be provided for any impacted floodplain.

3. Describe the impact of such alterations on the fish and wildlife resources of the site;

The proposed development will not adversely affect fish and wildlife. An environmental assessment will be prepared by a certified professional and any potential wildlife impacts will be mitigated.

4. Describe local aquifer recharge and groundwater conditions and discuss the changes to these water supplies which would result from development of the site.

Rainfall entering and traveling through the site will be able to percolate through the proposed dry retention areas. Therefore, there is no anticipated impact to aquifer recharge and groundwater conditions. Wet detention will also be provided.

Additional Environmental Analysis (Wetlands)

The site contains a significant amount of wetlands which are a by-product of mining and excavation activities over several previous decades. Additional historical aerals are included at the end of the Impact Assessment. Wetland impact minimization and mitigation will be provided through several components.

On-site wetland mitigation will be provided through mitigation bank credits. The goal is to have the mitigation bank located within the same Peace River watershed as the site. The ecologist is currently looking at availability in the Tippen Bay Wetland Mitigation Bank and Horse Creek Mitigation Bank within the Peace River Watershed. It is anticipated that available credits for wetland mitigation will be obtained through mitigation banks within the Peace River watershed.

The potential owner is willing to place a 50' conservation easement along the southern property boundary to increase the ecological value for the proposed development. The conservation easement placement would be based on the final wetland delineation of the property.

A designated Floodplain compensation area will be placed along the northern portion of the site which will minimize wetland impacts and provide a natural buffer, south of Polk Parkway. The designated floodplain compensation area within the existing wetland area and adjacent (if needed) will add greater ecological value to the site, over other floodplain compensation options.

F. Population

To determine the impact of the proposed developments additional population, the applicant shall:

1. Calculate the projected resident (and transient) population of the proposed development and the generated population in the case of commercial or industrial uses;

The proposed project would have minimal impact to population to the area. Most job creation would likely be sourced from the local population. The generated population may be in the range of 6 residents.

2. Describe, for commercial and industrial projects, the employment characteristics including the anticipated number of employees, type of skills or training required for the new jobs, the percentage of employees that will be found locally or are expected to be drawn from the county or state, and the number of shifts per day and employees per shift;

The proposed storage yard with the future warehouse buildings is anticipated to have 20 employees (4 employees per 10,000 sf warehouse and 3 employees per 6,000 sf warehouse). At least 60% of the jobs created would typically be locally sourced. There is anticipated to be one shift per day and 3-4 employees per shift, per building.

Skills required for the new jobs will include administration, maintenance, management, fork-lift operation, warehousing, custodial and other related skills.

3. Indicate the expected demographic composition of the additional population (age/socio-economic factors);

Middle class or low income populations between the ages of 20-60 would be the anticipated demographic.

4. Describe the proposed service area and the current population thereof.

The adjacent parcels are vacant with industrial use to the north and northeast. No population exists within the adjacent developments or parcels.

G. General Information

To determine if any special needs or problems will be created by the proposed development, the applicant shall:

1. List and discuss special features of the proposed development that promote desirability and contribute to neighborhood needs; and

The proposed development will provide the required landscaping along the frontages which will enhance the site over the existing conditions of the parcel. Additional landscape buffering may be required but will need to be reviewed with regards to the existing natural tree buffer, buffering distance, and ground elevations. 100 foot buffers will be provided on the south and east sides due to the adjacent A/RR land use designation.

2. Discuss the demand on the provision for the following services (Infrastructure Impact Info):

- a. Parks and Recreation

The proposed development will have minimal impact to population in the area and no demand on parks and recreation are anticipated.

- b. Educational Facilities (preschool/elementary/middle school/high school);

The proposed development will have minimal impact to population in the area and no demand on educational facilities are anticipated.

- c. Health Care (emergency/hospital)
The proposed development will have minimal impact to population in the area and no demand on health care, including hospitals, is anticipated.
- d. Fire Protection
The proposed development will provide adequate fire protection systems through the use of new fire hydrants and potentially fire suppression systems in the buildings.
- e. Police Protection and Security
Barbed wire fencing will be provided for security. The entire property is currently fenced and will be fenced.
- f. Electrical Power Supply.
There is existing power and electric meter at the northeast corner of the property along Pavers Road.

H. Maps

1. Maps shall be used to give the public agencies a clear graphic illustration and visual understanding of the proposed development and the potential positive and negative impacts resulting from the development.
2. Maps shall be of sufficient type, size, and scale to facilitate complete understanding of the elements of the proposed development. Scales shall be clearly indicated on each map and the dates of preparation and revisions shall be included. The project boundaries shall be overlaid on all maps. The following maps shall accompany all Impact Assessment Statements:
3. Map A: A location map showing the relationship of the development to cities, highways, and natural features;
4. Map B: A Topographical Map with contour intervals of no greater than five feet, the identification of the property boundaries, and a delineation of the areas of special flood hazard (100 year flood plain) as shown on the Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA) for Polk County;
5. Map C: A Land Use and Land Use District Map showing the existing land use designations and districts on and abutting the proposed development, including lot sizes and density;
6. Map D: A Soils Map with soils designated according to Natural Resources Conservation Service classifications. If available, USDA Natural Resources Conservation Service (NRCS) soil surveys are preferable;
7. Map E: A Traffic Circulation Map identifying any existing roads on or adjacent to the proposed development and indicating the name of the roads, maintenance jurisdiction, and pavement and right-of-way widths.
8. Map F: A Site Plan showing land uses, the layout of lots, the type and maximum density for each type of residential area; the typical minimum lot sizes and dimensions for each use and unit type, and the dimensions, locations, and types of buffers, easements, open space areas, parking and loading areas, setbacks, and vehicular circulation routes;
9. Map G: A Drainage Map delineating existing and proposed drainage areas, water retention areas, drainage structures, drainage easements, canals, wetlands, watercourses, and other major drainage features.

Please refer to the attachment section for the associated maps.

Please do not hesitate to contact me if any additional information is required.

Madrid Engineering Group, Inc.

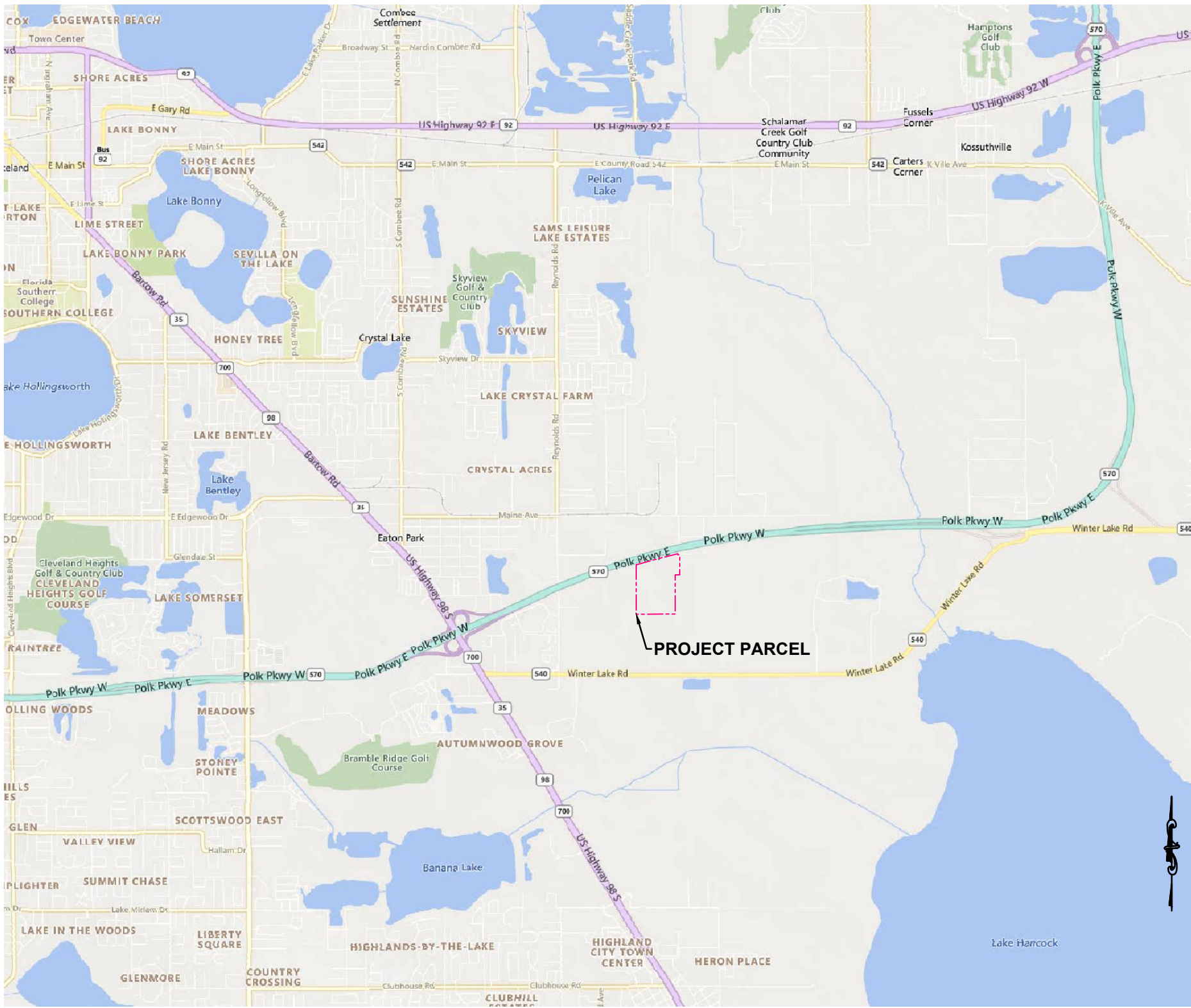


Zach H. Thornton, P.E.
Project Manger
FL PE# 79489

Attachments:

- Map A: Location map
- Map B: Topographical Map
- Map C: Land Use and Land Use District Maps
- Map D: Soils Map
- Map E: Traffic Circulation Map
- Map F: Site Plan
- Map G: Drainage Map
- Additional Maps – Historic Aerials (wetlands)

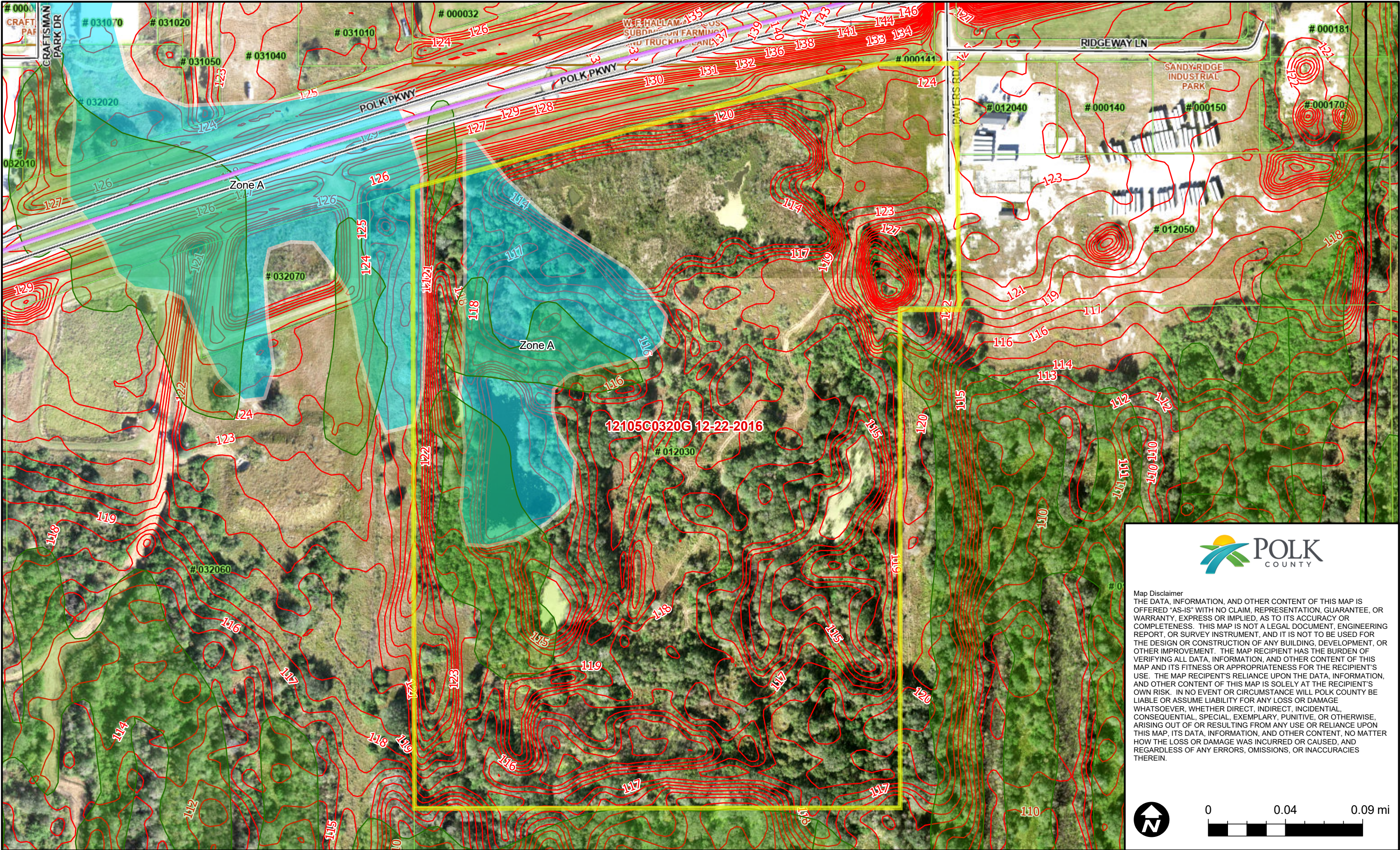
ATTACHMENTS:



PROJECT PARCEL

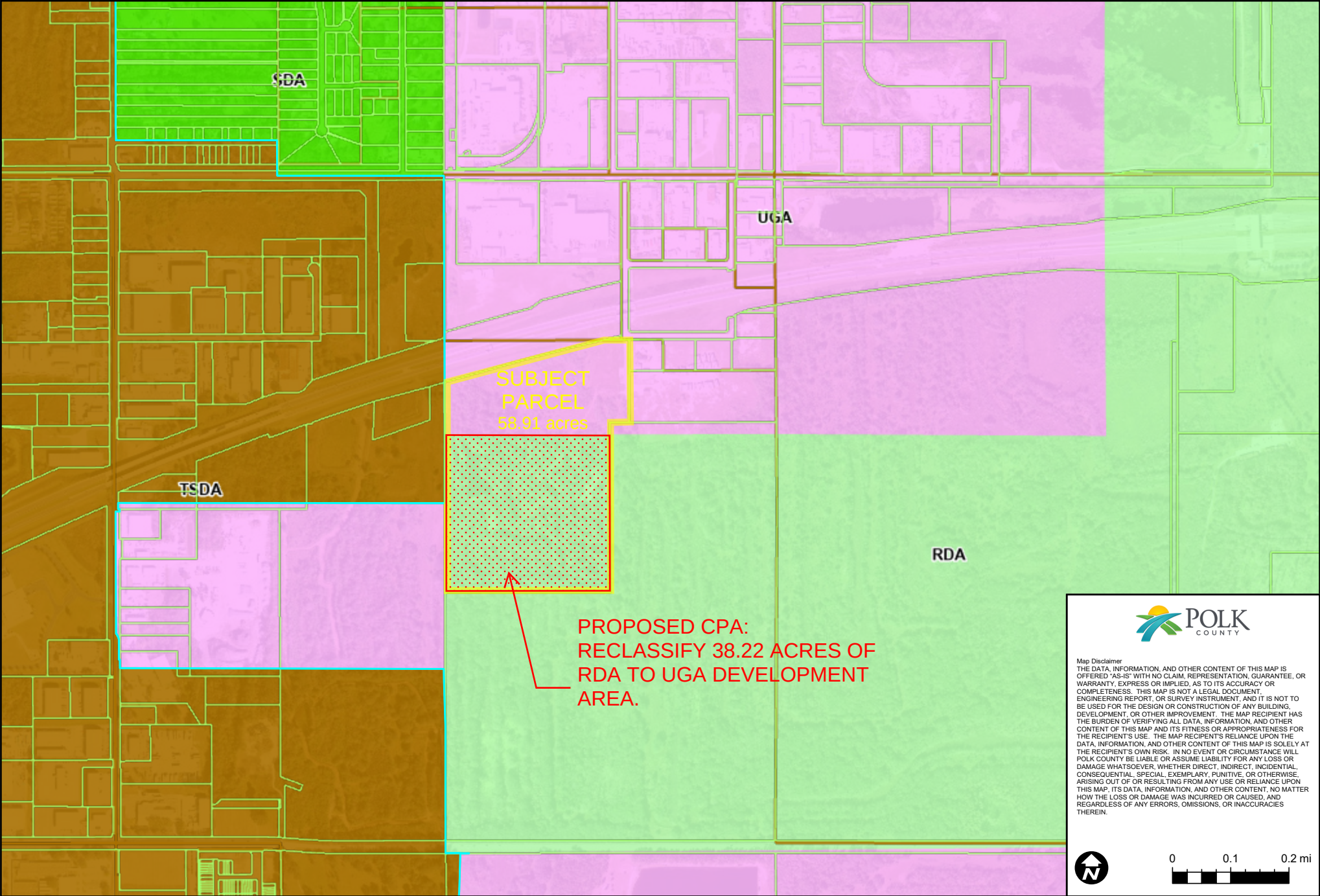
2925 Pavers Road Topographic Map

MAP B

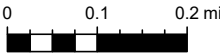


MAP C - DEVELOPMENT AREA MAP_PAVERS RD.

MAP C1

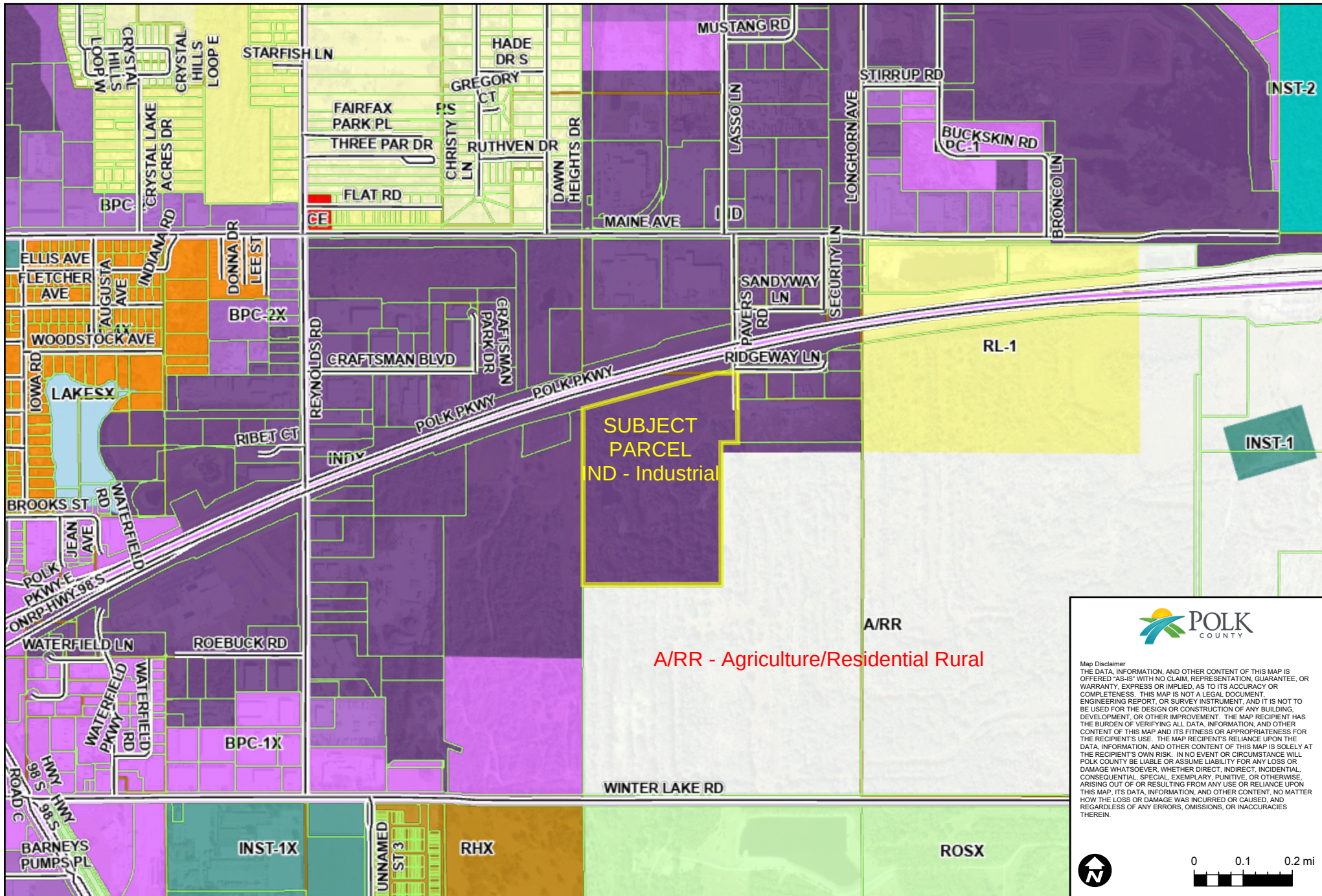


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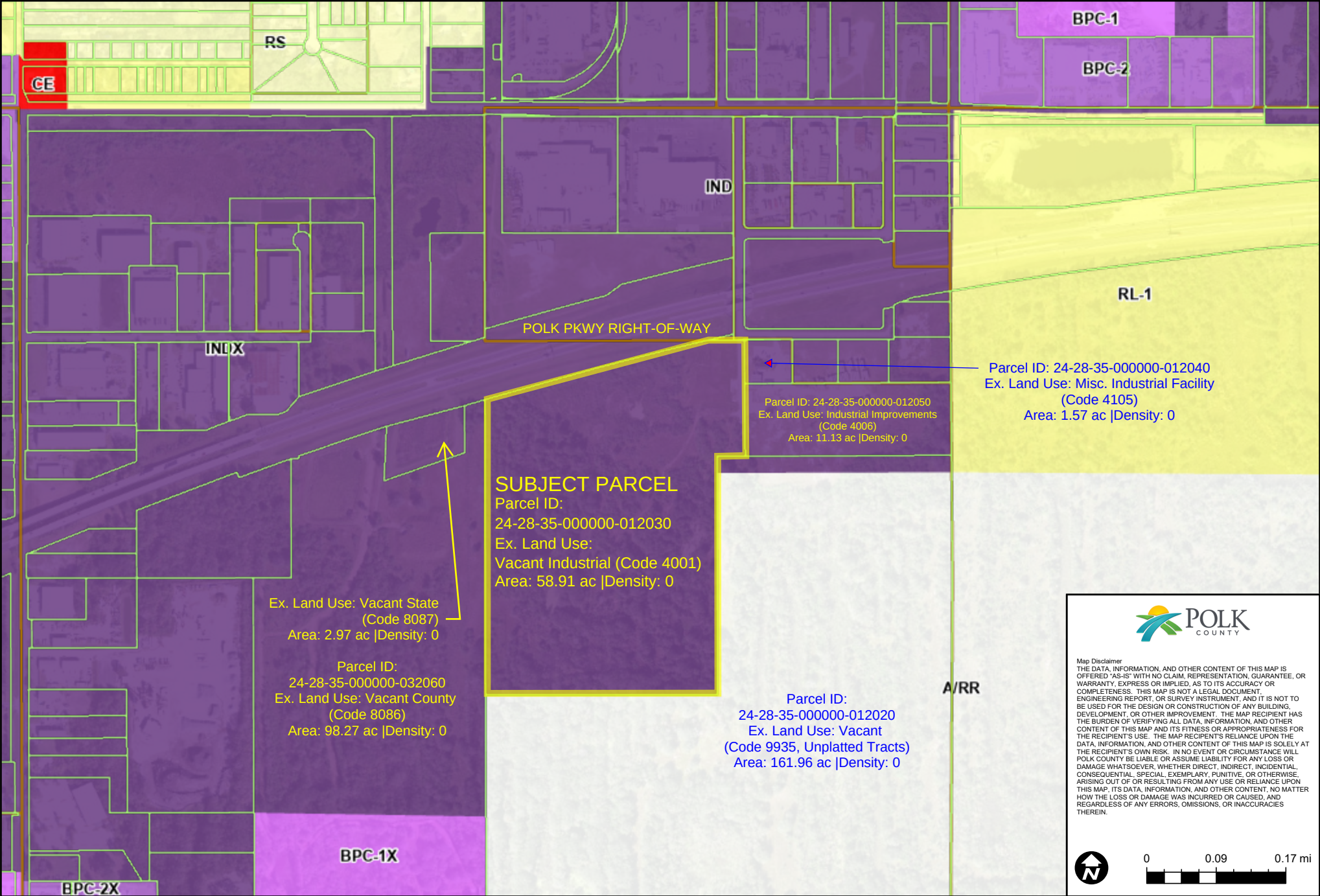


MAP C - LAND USE DISTRICT/ZONING MAP_PAVERS RD.

MAP C2

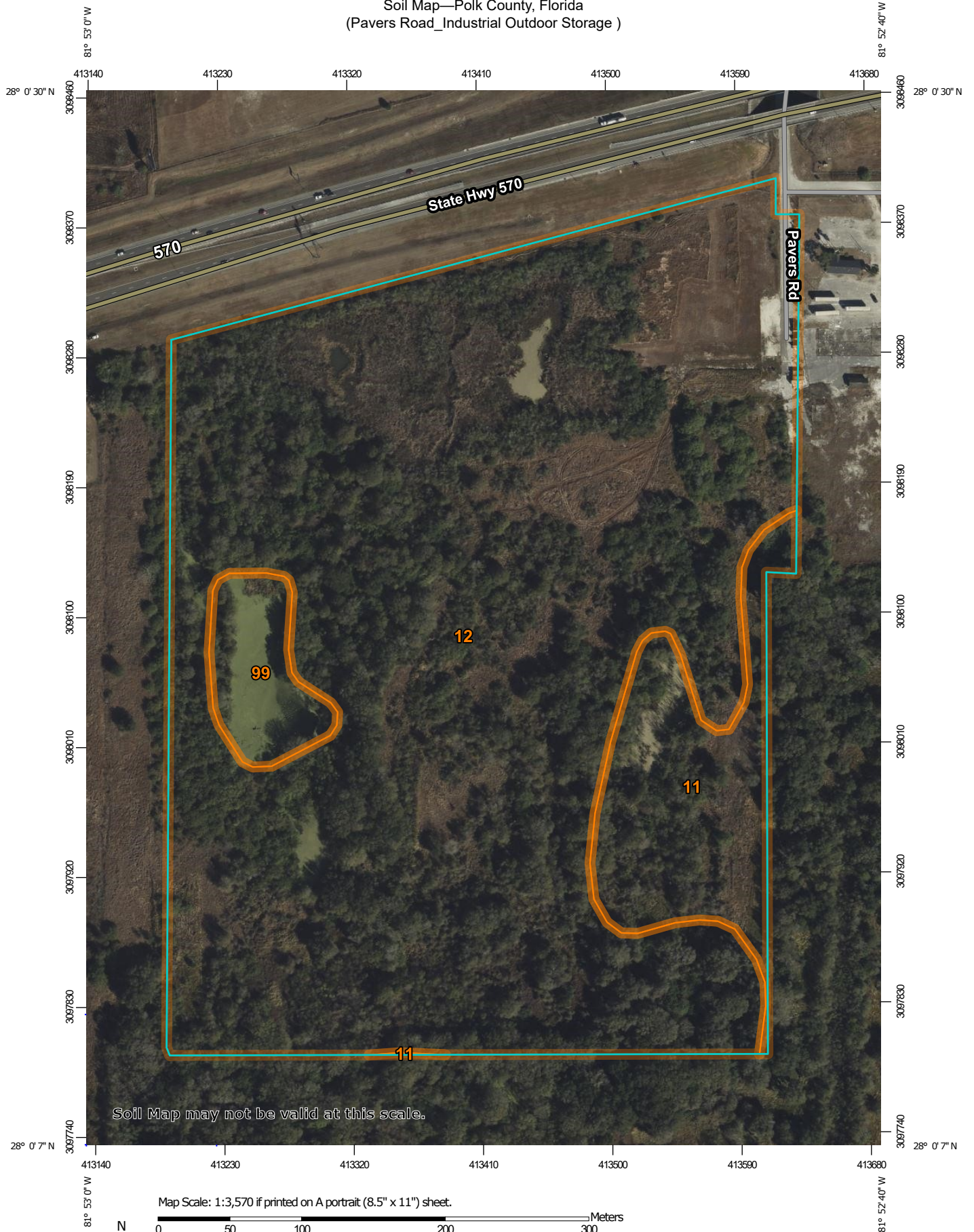


MAP C - LAND USE MAP_PAVERS RD.



MAP D

Soil Map—Polk County, Florida
(Pavers Road_Industrial Outdoor Storage)



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

2/28/2026
Page 1 of 3

Soil Map—Polk County, Florida
(Pavers Road_Industrial Outdoor Storage)

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Polk County, Florida

Survey Area Data: Version 23, Aug 29, 2025

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 6, 2022—Mar 21, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI		Percent of AOI
11	Arents-Water complex	HSG A	5.5	9.5%
12	Neilhurst sand, 1 to 5 percent slopes	HSG A	50.7	87.1%
99	Water		2.0	3.4%
Totals for Area of Interest			58.2	100.0%

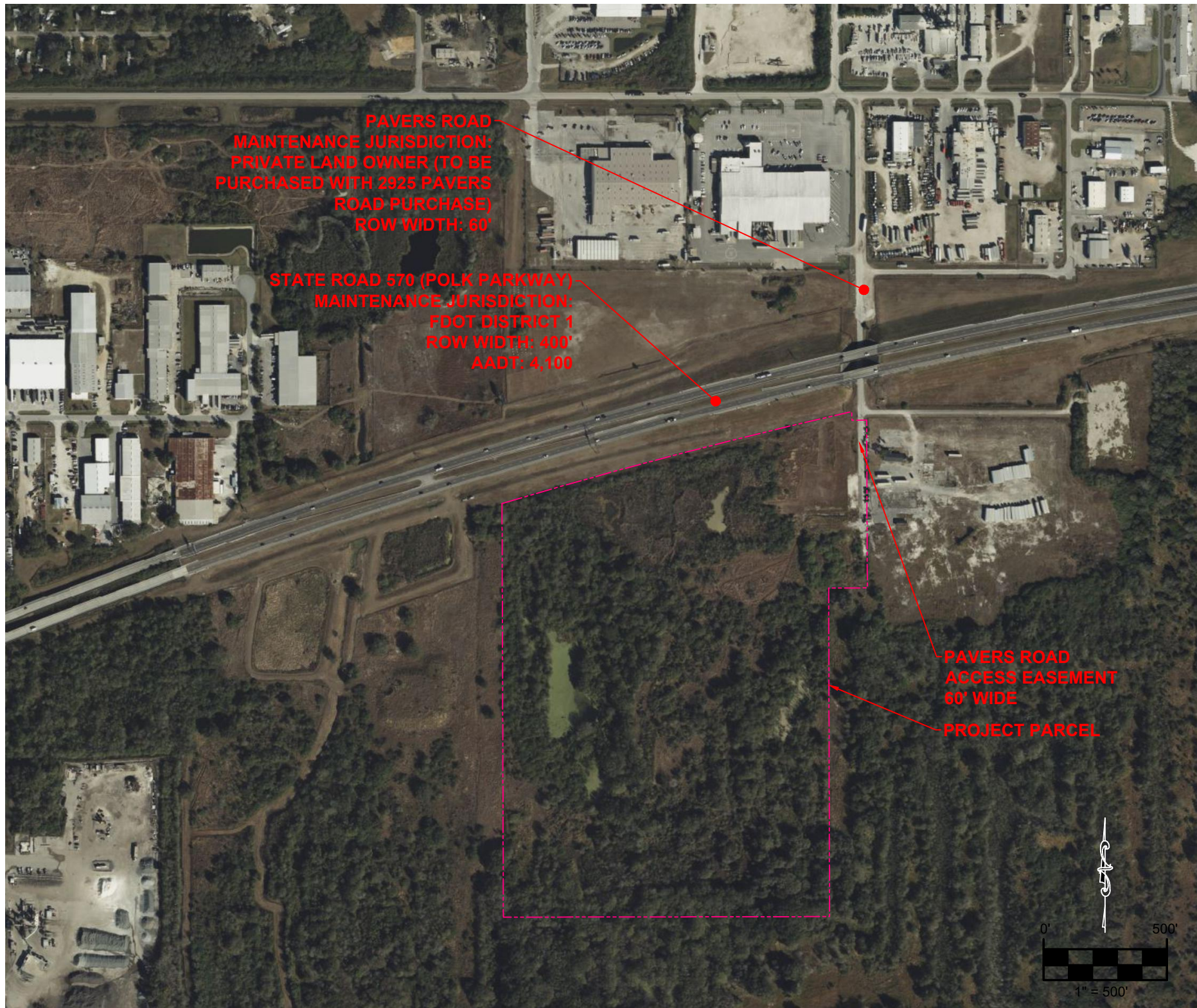
**WHS VISIONS OF
LAKELAND LLC**
4360 MAINE AVENUE
LAKELAND, FL 33801

PAVERS ROAD
INDUSTRIAL OUTDOOR STORAGE (IOS)
2925 P AVERS RD., LAKE LAND, FL 33801
SCALE-SCALE CPA
MAP E - TRAFFIC CIRCULATION MAP

ZACHARY H. THORNTON, PE FLORIDA REG.
PROF. ENGINEER No.: 79489

[illegible]

PROJECT NO. M2690000.00	SHEET NO. MAP-E
DATE 05/01/2026	
SCALE AS NOTED	



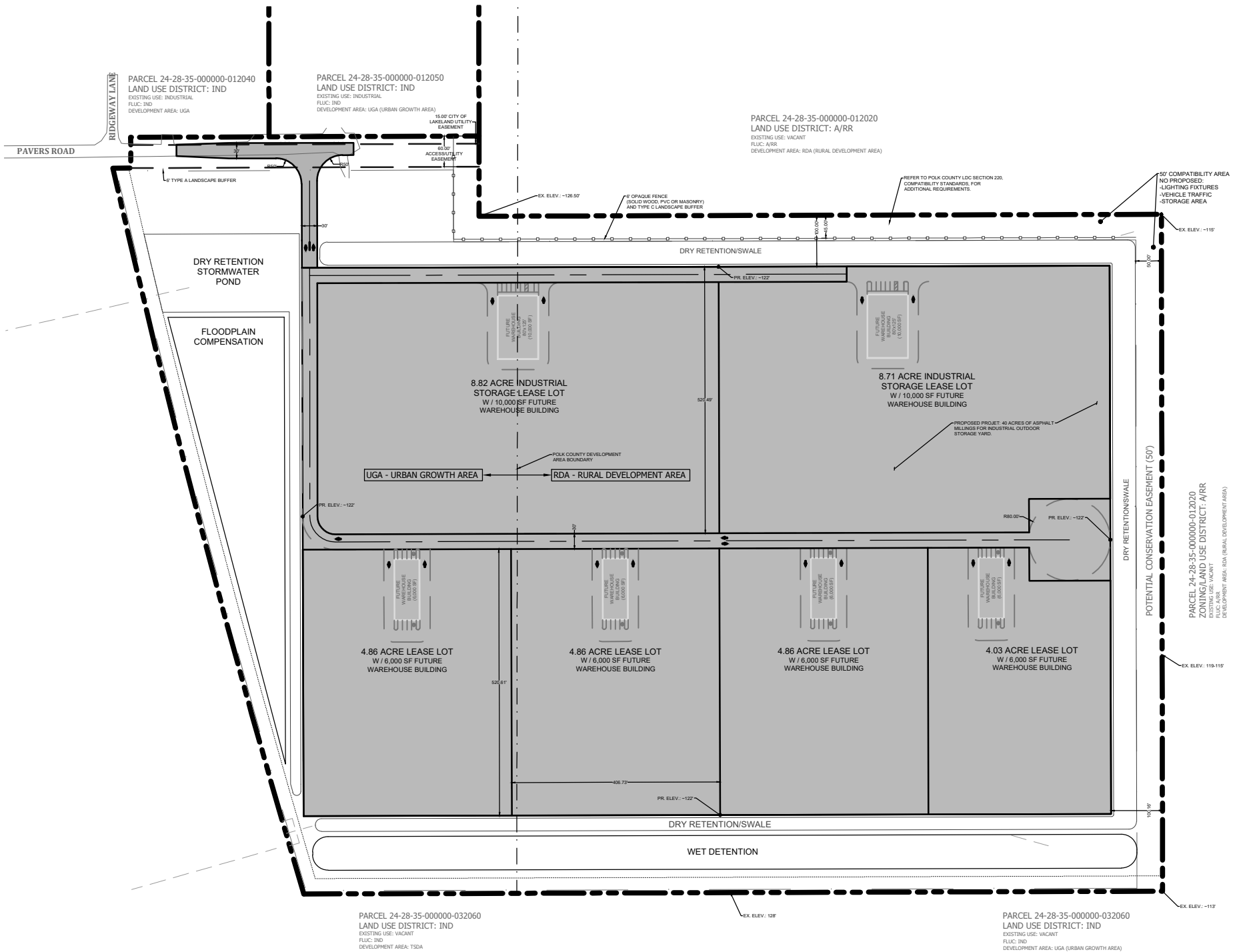
**WHS VISIONS OF
LAKELAND LLC**
4360 MAINE AVENUE
LAKELAND, FL 33801

PAVERS ROAD
INDUSTRIAL OUTDOOR STORAGE (IOS)
2925 PAVERS RD., LAKELAND, FL 33801
SCALE-SCALE CPA
MAP F - SITE PLAN (8.5 X 11)

CHARY H. THORNTON, PE FLORIDA REG.
OF. ENGINEER No.: 79489

[illegible]

PROJECT NO. M2690000.00	SHEET NO. MAP-F
DATE 05/01/2026	
SCALE	
AS NOTED	



**WHS VISIONS OF
LAKELAND LLC**
4360 MAINE AVENUE
LAKELAND, FL 33801

PAVERS ROAD
INDUSTRIAL OUTDOOR STORAGE (IOS)
2925 PAVERS RD., LAKELAND, FL 33801
SCALE-SCALE CPA
MAP G - DRAINAGE MAP (8.5 X 11)

ZACHARY H. THORNTON, PE FLORIDA REG.
PROF. ENGINEER No.: 79489

[illegible]

PROJECT NO. M2600000.00	SHEET NO. MAP-F
DATE 05/01/2026	
SCALE	
AS NOTED	



1994 Aerial

2925 Pavers RD, Lakeland, FL 33803

Legend



Google Earth

Image U.S. Geological Survey



1000 ft

1999 Aerial

2925 Pavers RD, Lakeland, FL 33803

Legend



Google Earth

Image U.S. Geological Survey



1000 ft

2004 Aerial

2925 Pavers RD, Lakeland, FL 33803

Legend



Google Earth

Image © 2025 The Florida Department of Environmental Protection



1000 ft

2004 Aerial

2925 Pavers RD, Lakeland, FL 33803

Wetlands depicted subject to agency approval and professional survey.

Legend

 Wetlands Shaded (19+/- ac)

