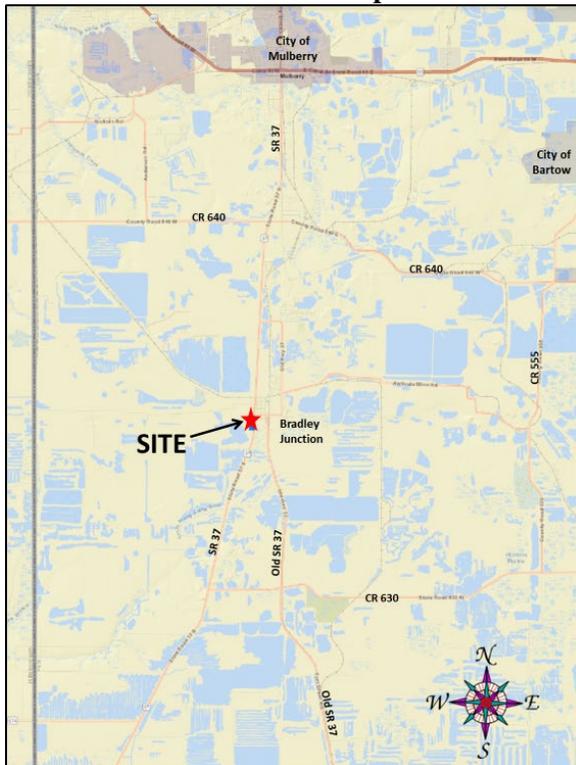


**POLK COUNTY
DEVELOPMENT REVIEW COMMITTEE
STAFF REPORT**

DRC Date: September 26, 2024	Level of Review: Level 3 Review
PC Date: December 4, 2024	Type: Conditional Use
BoCC Date: n/a	Case Numbers: LDCU-2024-33
Applicant: Sarah Case Next Level Planning	Case Name: Bradley Junction Farmworker Housing Addition
	Case Planner: Erik Peterson, AICP

Request:	Conditional Use modification of a Barrack Style Farmworker Dormitory from 100 workers to 120 workers in 16,000 square feet of total buildings on 13.33 acres in a Phosphate Mining (PM) district.
Location:	6980 State Road 37 Bradley Junction, west of SR 37, south of Main Avenue and Forbes Road, north of CR 630, south of CR 640, south of the city of Mulberry in Sections 11 and 14, Township 31, Range 28.
Property Owners:	Pittman PN Investments, LLC
Parcel Size (Number):	±13.33 acres (233111-000000-042020 and 042050, 233114-000000-031030 and 031010)
Future Land Use:	Phosphate Mining (PM)
Development Area:	Rural Development Area (RDA)
Nearest Municipality:	Mulberry seven (7) miles
DRC Recommendation:	Approval
Planning Commission Vote:	Pending hearing

Location Map



2021 Satellite Photo



Summary:

The applicant requests a modification of an approved Barrack Style Farmworker Dormitory serving up to 100 workers in 16,000 square feet of buildings on 13.33 acres in a Phosphate Mining (PM) district. After review of the facility by Federal and state agencies, it was discovered that an additional 20 workers can be housed in the facility. Barracks Style Dormitory developments are conditional uses subject to Planning Commission approval through a Level 3 Review in A/RR, RCC-R, RS and PM. Intensity of the facility shall be at the Planning Commission's discretion; however, the maximum intensity of Barracks Style Farm Worker Dormitory housing shall not exceed the limits established in the Comprehensive Plan for intensity within the district which is 16 workers per acre. The requested increase will bring the facility's intensity up to nine (9) workers per acre.

The facility was originally approved by the Planning Commission on November 1, 2023, unanimously with a vote of 7-0. The implementation of the approval is an adaptive reuse of a former state-owned facility providing residential treatment and rehabilitation of youth offenders. The number of farmworkers requested in this modification is similar to the number of patient residents within the treatment center in the past. Under Section 906.E, up to 3,200 sq.ft. of additional structures or expansions can be done through a minor modification but by virtue of the recommended conditions, the number of farmworkers housed onsite was binding at 100. Therefore, the increase to 120 requires further Planning Commission approval.

There are numerous resources onsite and in the area to support farmworkers. There are recreation facilities onsite and room for additional ones. There is a convenience store with food service within short walking distance. There is fire protection, access is directly on a minor arterial roadway, public water is available if needed, and mass transit service is provided weekdays and Saturday at a nearby bus stop.

Staff continues to support approval of using this facility to its maximum ability because of the opportunity to reuse existing structures in a similar manner to their previous use and for the positive locational attributes the site offers to farmworker needs. The site is also well buffered and setback from existing residences.

Findings of Fact

- *This is a request for Conditional Use approval to expand an approved Barrack Style Farmworker Dormitory of 100 workers to 120 workers in 16,000 square feet of buildings on 13.33 acres in a Phosphate Mining (PM) district.*
- *The site is in a Rural Development Area (RDA), which is an area “characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments” according to POLICY 2.108-A1 of the Comprehensive Plan. The site is in a Rural Development Area (RDA), which is an area “characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments,” according to POLICY 2.108-A1 of the Comprehensive Plan.*
- *The property is Phosphate Mining (PM) on the Comprehensive Plan Future Land Use Map. POLICY 2.114-A1 of the Comprehensive Plan states that the “Phosphate Mining*

areas are generally characterized by existing or proposed phosphate-mining operations, phosphate-mining support facilities, and non-reclaimed phosphate-mined areas.”

- *POLICY 2.114-A3, PERMITTED ACTIVITIES lists “Agriculture and Farmworker housing under specific design parameters listed in the Land Development Code not to exceed an intensity of sixteen (16) workers per acre” as “activities shall be permitted within the Phosphate Mining land use category as mapped pursuant to Policy 2.114-A2.” The proposed modification will result in nine (9) workers per acre which is 56.25% of the maximum.*
- *Section 205, Table 2.1, requires Barrack Style Farmworker Dormitories to undergo a Level 3 Review and gain approval by the Planning Commission to locate in PM district.*
- *Section 303, Farm Worker Dormitory, Barrack Style, states “Farm workers may be housed in any residential land use district in conformance with the standards for residential development. This category sets forth the standards for barrack style dormitories.*
 1. *Barracks Style Dormitory developments are conditional uses subject to **Planning Commission approval through a Level 3 Review** in A/RR, RCC-R, RS and PM.*
 2. ***Intensity of the facility shall be at the Planning Commission's discretion** in A/RR, RCC-R, RS and PM; however, the maximum intensity of Barracks Style Farm Worker Dormitory housing shall not exceed the limits established in the Comprehensive Plan for intensity within the district. For purposes of measurement, the LDC considers six (6) workers to equal one dwelling unit equivalent unless the facility meets Apartment Style Farmworker Dormitory standards.*
 3. *As part of its review in A/RR, RCC-R, RS and PM, the **Planning Commission shall consider the other design features required for Apartment Style Farm Worker Dormitories as potential conditions of approval.** Additional consideration shall be given to proximity to potential employment sites and worker access to goods and services.*
 4. *In BPC-2 and IND farm worker housing is not to exceed an intensity of thirty-two (32) workers per acre or the limitations established by the Department of Health for water and wastewater usage, whichever allowed intensity is the lesser and permits for Migrant Labor Camp or Residential Migrant Housing are obtained.”*
- *The surrounding Future Land Uses are Agricultural/Residential Rural (A/RR), Rural Cluster Center (RCC-R), and Phosphate Mining (PM).*
- *This site abuts a solar farm to the west, and single-family residential to the north, east, and south that are separated by vacant parcels, streets, and a State Highway.*
- *The site is approximately ¼ mile from a convenience store with food service.*
- *The property is zoned for schools in Mulberry, 7-8 miles away: Purcell Elementary, Mulberry Middle and Mulberry High School.*
- *County Fire response to this project is from Polk County Fire Rescue Station 4 located at 6949 Old Highway 37 in Bradley Junction. The travel distance is approximately less than ½ mile away. The ambulance response is from Polk County Fire Rescue Station 721 located in Mulberry at 700 NE 9th Ave eight (8) miles away.*
- *There is a fire hydrant less than 600 feet from the property on the north side of Forbes Road.*
- *The site is served by the Polk County Sheriff’s Office Southwest District Command at 4120 US Highway 98, south of Lakeland, 23 miles driving distance from the site.*

- *Polk County serves potable water to this area through its Southwest Regional Utility Service Area (SWRUSA) Bradley Junction Public Water System (Bradley PWS).*
- *State Road 37 is classified as a Minor Arterial Road in the Polk County Roadway Inventory and is tracked for traffic counts or concurrency on the Polk County Transportation Organization's Roadway Network Database.*
- *According to the Transportation Planning Organization, there is adequate capacity on State Road 37 as well as other roads such as County Roads 630 and 640, within the area transportation network to support the development currently.*
- *Mass transit service is provided south to Bradley Junction through Route 21X of the Citrus Connection. The nearest stop is less than 800 feet from the site at the intersection of Whidden Street and Main Avenue.*
- *There is a pond at the north end of the property that has designated wetlands on it and its banks.*
- *There is a portion of the site that is in the 100-year flood hazard area on the north that includes a small pond.*
- *The site is comprised of soils that have moderate limitations to dwellings and sever limitations to septic tanks, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey.*
- *The site was within a mile radius of an endangered animal species sighting according to the Florida Natural Areas Inventory of 2002 but there has not been a nearby sighting in 2006 or later. (Source: Florida Fish & Wildlife Conservation Commission (FWC).*
- *The South Lakeland Airport, over seven (7) miles away, is the closest public use airport.*
- *There is a convenience store with food service less than 1,500 feet from the site.*
- *At an advertised public hearing on November 1, 2023, the Planning Commission voted 7:0 for APPROVAL of LDCU-2023-36.*

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 (DRC) finds that with the proposed conditions the request **IS COMPATIBLE** with the surrounding land uses and general character of the area and **IS CONSISTENT** with the Polk County Comprehensive Plan and Land Development Code. Therefore, the DRC recommends **APPROVAL of LDCU-2024-33.**

CONDITIONS OF APPROVAL

Based upon the findings of fact, the DRC recommends APPROVAL of LDCU-2023-36 with the following conditions:

1. The subject property is approved for a Barrack Style Farmworker Dormitory serving up to 120 workers in 16,000 square feet of buildings on 13.33 acres. [PLG]
2. The site plan included herein together with the conditions of approval shall be considered the "Binding Site Plan." Any modifications to LDCU-2024-33, except for those listed in Section 906.E of the LDC, shall constitute a Major Modification to this approval and require a Level 3 Review before the Planning Commission. [PLG]

GENERAL NOTES

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

NOTE: Approval of this request shall not constitute a waiver or variance from any applicable development requirement unless specifically noted in the conditions of approval and consistent with the LDC.

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

NOTE: Approval of this request is only for Level 3 Review and only for those development decisions within the Planning Commissioners’ jurisdiction. Building permits will be required for improvements to structures in accordance with Chapter 553 of the Florida Statutes.

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

Surrounding Land Use Designations and Current Land Use Activity

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

Table 1

<p>Northwest: Agricultural/Residential Rural (A/RR) TECO Solar Power Generation Facility (Solar Farm)</p>	<p>North: A/RR, PM, and Rural Cluster Center - Residential (RCC) Single-Family Residential</p>	<p>Northeast: RCC-R Single-Family Residential</p>
<p>West: Agricultural/Residential Rural (A/RR) TECO Solar Farm</p>	<p>Subject Property: Phosphate Mining (PM) Former state-owned residential treatment facility (Emergency Shelter)</p>	<p>East: RCC-R Single-Family Residential</p>
<p>Southwest: Agricultural/Residential Rural (A/RR) TECO Solar Farm</p>	<p>South: PM, A/RR Single-Family Residence Communication Tower Entrance to Solar Farm</p>	<p>Southeast: PM Former Phosphate Mine (under reclamation)</p>

The site is well isolated from abutting neighbors. The site is bordered to the west by a solar power generation facility owned by Tampa Electric Company (TECO) and State Road 37 to the east. There is a nearly three-acre parcel that separates the facility from the one single-family residence on the south side and a 2½ acre parcel that is between it and the first residential block of Onzelo Subdivision on the north side.

Compatibility with the Surrounding Land Uses and Infrastructure:

This request is considered, in planning terms, as an adaptive reuse. This once state-run residential treatment facility for youth offenders has been offered for surplus. The owner seeks to repurpose the existing facility into a 120-bed farmworker housing facility. Land use compatibility is reached

The LDC defines compatibility as “A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.”

through spacing and relative isolation as it has in the past for its former use. Infrastructure capacity is adequate to support the new use as it was to support the old use. Existing infrastructure in the Bradley Junction area provides access to transportation, commerce, recreation facilities, and fire protection that complement what the farmworker host will provide internally.

A. Land Uses:

While the Phosphate Mining (PM) district is not the most ideal Future Land Use Map designation for both previous and proposed use of the property, the Comprehensive Plan allows for farmworker housing. This facility cannot be retrofitted to meet the requirements of an apartment style farmworker housing facility because the design dictated by the former use renders it unfeasible. The benefit to purchasing this property for the proposed use is that it is an existing dormitory structure that does not need a significant amount of reconstruction or renovation. Farmworker housing in a more barrack style layout requires a public hearing and Planning Commission approval (Level 3 Review) in the PM district. If it could be designed to more of an apartment style (per LDC Section 303), even at 120 workers, a public hearing would not be required for the same proposed intensity. The upper limit for Apartment Style Farmworker Housing is 128 workers.

Section 303, Barrack Style Farmworker Dormitories, condition number 3 of the LDC states “*As part of its review in A/RR, RCC-R, RS and PM, the Planning Commission shall consider the other design features required for Apartment Style Farm Worker Dormitories as potential conditions of approval. Additional consideration shall be given to proximity to potential employment sites and worker access to goods and services.*” This site and the request meets many of the Apartment Style Farm Worker Dormitory requirements such as the quantity of workers relative to the property size, access requirements, and onsite recreation facilities. It also offers access to other goods and services such as general mercantile, prepared food, and fixed-route mass transit.

B. Infrastructure:

Farmworker housing doesn't have the typical needs of residential housing and can be located in isolated areas. Because of the seasonal nature of their operations, their infrastructure and services needs are intermittent. While farmworker housing can benefit from some nearby urban services, what services they lack can be provided internally by their host. In this location, there is public water and fire rescue services. There is also some commerce and recreation within short walking distance. There is even a limited mass transit connection nearby. There is not a need for schools with this type of farmworker housing because, under federal guestworker programs, participants are unaccompanied by children or other dependents.

Nearest and Zoned Elementary, Middle, and High School

The property is zoned for schools in Mulberry, the closest city. These are Purcell Elementary, Mulberry Middle School, and Mulberry High School. All are the closest schools. Farmworker housing, which is typically unaccompanied males, has no demand for K-12 schools. The table to follow provides data on the zoned schools and current capacities.

Table 2

Name of School	Annual Estimated Demand	Distance from subject site	School Capacity
Purcell Elementary	0 students	±7¼ miles driving distance from entrance to entrance	111%
Mulberry Middle School	0 students	±7½ miles driving distance from entrance to entrance	115%
Mulberry Senior High School	0 students	±7½ miles driving distance from entrance to entrance	82%

Source: Polk County School Board, Duncan Associates Educational Facility Impact Fee Study, GIS

Nearest Sheriff, Fire, and EMS Station

The fire station is very close. But this facility does not have ambulance service or paramedics. That response will come from Mulberry. Depending on squad availability and the urgency of the call, other stations may respond. The closest fire hydrant is on Forbes Road, approximately 1,000 feet from the northernmost (closest) building. If potable water service is extended to the property, a fire hydrant may be included in the extension through a cost share agreement.

Table 3

	Name of Station	Distance	Response Time*
Sheriff	Southwest District Command (4120 US 98N, Lakeland)	±23 miles	10 minutes
Fire	Polk County Fire Rescue Station 4, 6949 Old Highway 37, Bradley Junction	±0.4 miles	4 minutes
EMS	Polk County Fire Rescue Station 721 700 NE 9th Ave, Mulberry	±8 miles	12 minutes

Source: Polk County Sheriff's Office and Public Safety

*Response times are based on when the station receives the call and not from when the call is made to 911.

The nearest Sheriff's substation is the Southwest District Command at 4120 U.S. Highway 98, south of Lakeland next to Polk State College, 23 miles driving distance from the site. Sheriff response times are not as much a function of the distance to the nearest sheriff's substation rather more a function of the overall number of patrol officers within the County. However, patrol coverage is less in these more rural areas of the County.

Water and Wastewater Demand and Capacity:

There is an ample capacity of potable water available but no wastewater services. The conversion of this facility to farmworker housing from a former youth treatment facility will not likely result in significantly greater needs of the existing potable water system.

A. Estimated Demand and Service Provider:

Farmworker housing will likely have less demand for water and wastewater than the previous youth residential treatment facility because the workers will not occupy the site as much during the day. Farmworkers typically work offsite six days of the week from dawn until dusk.

Table 4

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted PM	Maximum Permissible in the district PM	Proposed Plan
13.33± acres PM			
Permitted Intensity	100-bed Farmworker Housing Facility	213-bed Farmworker Housing Facility	120-bed Farmworker Housing Facility
Potable Water Consumption (GPD)	3,366 GPD	7,029 GPD	3,960 GPD
Wastewater Generation (GPD)	3,060 GPD	6,390 GPD	3,600 GPD

Source: Polk County Concurrency Manual & Polk County Utilities: multifamily 6 workers per unit at 198 gpd per unit water 180 wastewater. Mining does not use potable water.

Polk County serves potable water to this area through its Southwest Regional Utility Service Area (SWRUSA) Bradley Junction Public Water System (Bradley PWS). There are no wastewater services available in Bradley Junction. The facility has a commercial grade onsite sewage disposal system.

B. Available Capacity:

The Bradley PWS potable water system has a permitted capacity of 1,919,000 gallons per day (GPD). Current usage is approximately 128,000 GPD with 83,000 GPD of committed capacity. This leaves 45,000 GPD of uncommitted capacity which is enough to serve nearly 125 single-family residential units. There are approximately 534 customers being served. The system growth rate is 3 GPD and less than two (2) new connections per year. At the current rate of growth, expansion of the system will not be needed for over 20 years. If this facility were to connect to the Bradley PWS, there would be ample capacity to serve the facility.

C. Planned Improvements:

There are no capacity improvements planned for the Bradley PWS. There are operational improvements underway with the system in the form of equipment upgrades and system control and data acquisition (SCADA).

Roadways/ Transportation Network

There are no anticipated adverse impacts to the transportation systems in the area because farmworker housing typically utilizes buses or vans to transport multiple workers at a time to job sites. There is ample capacity to support the highest development request the district will allow.

A. Estimated Demand:

There will potentially be a slight increase in transportation demand as a result of this modification. Farmworker Housing does not generate a lot of traffic. Even the maximum use of the property would not require a major traffic study. Staff assume that the worst-case scenario is for there to be only four workers per vehicle. For the expansion, this equates to 30 vehicles out and 30 vehicles in, and 30 would return during peak hour. PM as it stands can be used for single-family residential as the equivalent to A/RR at one (1) dwelling per five (5) acres. The following table provides a comparison between the current approval, maximum allowed, and the proposed increase.

Table 5

Subject Property	Estimated Impact Analysis		
	Demand as Currently Permitted PM	Maximum Permissible in the district PM	Proposed Plan
13.33± acres PM			
Permitted Intensity	100-bed Farmworker Housing Facility	213-bed Farmworker Housing Facility	120-bed Farmworker Housing Facility
Average Annual Daily Trips (AADT)	50	107	60
PM Peak Hour Trips	25	54	30

Source: Polk County Concurrency Manual

This request will not require either a major or minor traffic study since the average annual daily trip rate (AADT) will be less than 50 trips per day. This proposed farmworker housing facility will have no significant effect on the roadway system.

B. Available Capacity:

The site has direct access to State Road 37, a two-lane minor arterial roadway. According to the Polk County Transportation Planning Organization (TPO) approximately 7,400 vehicles per day travel that portion of the roadway each day on average. There are approximately 326 northbound vehicles and 340 southbound vehicles passing through during the PM peak hour. This road is currently operating at 36% of its capacity. Table 6, to follow, shows the generalized capacity on the immediately affected roads within proximity of the facility. Based on periodic traffic counts there appears to be adequate capacity on roads listed in Table 6.

Table 6

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard
4063E	County Road 630 From: State Road 37 To: U.S. Highway 17/98	B	808	C
4063W	County Road 630 From: U.S. Highway 17/98 To: State Road 37	B	812	C
5801N	State Road 37 From: State Road 674 To: County Road 640	B	574	C
5801S	State Road 37 From: County Road 640 To: State Road 674	B	560	C
4070E	County Road 640 From: State Road 37 To: U.S. Highway 17/98	B	1,036	C
4070W	County Road 640 From: U.S. Highway 17/98 To: State Road 37	B	1,044	C
7200E	State Road 674 From: Hillsborough County Line To: State Road 37	B	781	C
7200W	State Road 674 From: State Road 37 To: Hillsborough County Line	B	785	C

Source: Polk County Transportation Planning Organization, Concurrency Roadway Network Database November 2017

County Roads 630 and 640 are monitored for transportation capacity. They are both considered minor arterial roadways. According to the Polk County Transportation Planning Organization (TPO), approximately 2,000 vehicles per day travel on CR 630 each day on average and 4,000 on CR 640. There are less than 200 vehicles in either direction during the PM peak hour. These roads are currently operating at less than 15% of their capacity. Based on the projected impact shown in Table 5, and the estimated capacity shown in Table 6, there appears to be ample capacity available to support the proposed farmworker housing facility.

C. Roadway Conditions

Polk County uses the Pavement Surface Evaluation and Rating (PASER) method established by the Transportation Information Center at the University of Wisconsin-Madison. The roadway conditions are displayed in the table to follow under the Pavement Condition Index (PCI) rating.

Table 7

Road Name	Roadway Classification	Pavement Width	Pavement Condition Index (PCI)
State Road 37	Minor Arterial	32'	n/a
Main Avenue	Rural Minor Collector	20'	“very good” (8)

The property has frontage on State Road 37. Main Avenue in Bradley Junction is a two-lane, 20-foot wide, rural minor collector roadways with a PCI rating of “very good” (8) along the project frontage. State Road 37 is not rated under the County’s Road Inventory but appears to be in excellent condition since it was re-surfaced and widened in 2018. The Florida Department of Transportation (FDOT) maintains it.

D. Planned Improvements:

There are no transportation improvements planned for the Bradley Junction area. There will be no requirements of the applicant to provide offsite improvements.

E. Mass Transit

Mass transit service is provided south to Bradley Junction through Route 21X of the Citrus Connection. The closest fixed route transit stop is at the intersection of Whidden Street and Main Avenue in Bradley Junction. This is in comfortable walking distance of the site (<800 feet). One limitation is there are no sidewalks on any streets in Bradley Junction or on State Road 37. The other is there are only five trips on weekdays and three on Saturday.



F. Sidewalks

There is no sidewalk network in Bradley Junction. They may not be necessary on most streets. However, SR 37 and Main Avenue are needed due to higher vehicle volumes and greater speed of travel.

Park Facilities:

The proposed farmworker housing facility may slightly increase the demand for recreation facilities on the workers off days. However, there were some recreation facilities onsite during the previous use of the facility. Recreation facilities in rural areas are most often resource based facilities. Active recreation facilities such as ballfields are better suited for urban areas where they can serve higher population concentrations. There are active recreation facilities in Bradley Junction within a ¼ mile of the site. The largest resource-based facility within proximity of the site is the Bone Valley ATV Park. It’s not likely to be of much use to farmworkers of this facility.

A. Location:

Bradley Junction Mini Park is located at the intersection of Whidden Street and Pine Street, ¼ mile from the site. The Bone Valley ATV Park is approximately 4½ miles driving distance from the site on County Road 630 just east of the intersection of Fort Green Road and west of the CSX rail line.

B. Services:

The Bradley Junction Mini Park has an unlighted softball field, basketball court, picnic facilities and tot-lot, but no restrooms. The ATV Park requires an entrance fee to use.

C. Planned Improvements

There are no recreation improvements scheduled for the park in Bradley Junction in the 5-year Community Investment Program (CIP). Construction to expand the ATV Park with additional buildings, restrooms, amenities, and more trails is nearing completion.

Environmental Conditions

There are few environmental limitations onsite and the site plan shows no new structures. While the proposed farmworker housing facility will utilize existing structures, the minor modification process in Sections 120.J and 906.E will allow for a modest expansion of 20% without a public hearing. There are wetlands and floodplain onsite, but they are not likely to be altered. Most of the soils have only moderate limitations. No endangered species were found when the abutting solar farm was developed three years ago. Airports and groundwater wells will not be affected.

A. Surface Water:

The site is located within the Hookers Prairie Slough drainage basin. It is connected to the Alafia River watershed. Much of the surrounding areas have been mined for phosphate and is in a state of reclamation, so there are a lot of manmade lakes in the area. There are no new impervious surfaces planned on the facility site. The farmworker housing facility will use the existing structures.

B. Wetlands/Floodplains:

Approximately one third (1/3) of the site is located within a flood hazard area with no known base flood elevation (BFE). In the northern end of the property is a small pond. The pond and its banks are designated wetlands according to generalized information from the National Wetlands Inventory and the Southwest Florida Water Management District. One of the steel buildings is located in the 100-year unnumbered A-zone. No buildings are located in the estimated wetland area. No new buildings are planned for the site. The primary dormitory structure is outside of any estimated flood or wetland areas.

C. Soils:

The place where farmworker housing facility sits on the site is comprised of moderate soils that are more often prone to wetness, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey. This condition has not been a limitation to date. Current plans are to use the existing buildings. No new buildings are proposed on the site plan. If buildings are proposed in the future, they will not locate in the area of the severe soils because that portion of the property is also a pond, wetland, and 100-year flood area as well.

Table 8

Soil Name	Limitations to Dwellings w/o Basements	Septic Tank Absorption Field Limitations	% of Site (approximate)
Sparr Sand	Moderate: wetness	Severe: wetness, poor filter	30%
Arents	Moderate: wetness	Severe: wetness, poor filter	50%
Adamsville Fine Sand	Moderate: wetness	Severe: wetness, poor filter	10%
Holopaw Fine Sand	Severe: ponding	Severe: ponding, poor filter	10%

Source: Soil Survey of Polk County, Florida, USDA, Soil Conservation Service

D. Protected Species

The site is within a mile radius of an endangered animal species sighting according to the Florida Natural Areas Inventory of 2002 but not in 2006. The applicant of the abutting solar farm was required to conduct a professional assessment of the endangered species potential on the site in 2020. The study did not reveal any listed species in the area.

E. Archeological Resources:

The facility was originally constructed in 1975. There are no protected archeological resources in Section 11, Township 31, and Range 23, that the farmworker housing facility would adversely impact, according to the Florida Department of State, Division of Historical Resources. Bradley Junction has some historic resources, but there are no known historical or archeological resources on this site, according to the Secretary of State's Department of Historical Resources Florida Master Site File.

F. Wells (Public/Private)

The site is over ½ mile from the Bradley Junction Water Treatment Facility well site. There are no changes proposed at the site that could adversely affect this or any other public or private well.

G. Airports:

The site is not within any Airport Buffer Zones. The South Lakeland Airport is the closest public use airport. It is over seven miles from the site. This location is far from an airport flight path or protection zone.

Economic Factors:

The need for federal and state government buildings located in a rural area will change as the programs that prompted their need changes. When these facilities are no longer needed and the buildings are offered as surplus, it is most economical to find another land use that can reuse the structures. This is termed in the planning profession as adaptive reuse. The uses for these buildings are more limited in a rural area far from metropolitan areas such as Bradley Junction. This proposed use is very similar to the previous uses of the property, so the buildings are easy to repurpose without many extra improvements.

Farmworkers are an economic benefit to rural clusters such as Bradley Junction. While a portion of their wages will be spent in their country of origin, they will spend money on purchasing goods from local stores such as the 7-Star Food Store in the center of Bradley Junction.

Independent farmworker labor facilities can have a broad market radius sometimes exceeding a 1-hour driving distance. This facility will be centrally located to many farm operations in Hillsborough, Manatee, Hardee, and Highlands County in addition to southern Polk County. The site of this facility is in between citrus groves to the east and tomato fields to the west along with many various row crops in between.

Consistency with the Comprehensive Plan, LDC, and Other County Ordinances:

The site is located in the Rural Development Area (RDA), which is the area that “*is characterized by large open areas, agricultural use, with scattered development and rural centers. Services are limited and mostly found in the rural centers and clustered developments.*” according to POLICY 2.108-A1 of the Comprehensive Plan. The site abuts a rural center known as Bradley Junction, a once incorporated town. Potable water service is available in Bradley Junction from Polk County Utilities. There is also a professional fire rescue station in Bradley Junction.

According to POLICY 2.114-A1 of the Comprehensive Plan, Phosphate Mining areas are generally characterized by existing or proposed phosphate-mining operations, phosphate-mining support facilities, and non-reclaimed phosphate-mined areas. However, farmworker housing is listed as a permitted activity in the Phosphate Mining (PM) district because POLICY 2.114-A3.c lists “*Agriculture and Farmworker housing under specific design parameters listed in the Land Development Code not to exceed an intensity of sixteen (16) workers per acre*” as a permitted use. The applicant’s requested expansion will bring the approved facility up to nine (9) workers per acre which is 56.25% of the maximum permitted under the Comprehensive Plan.

Chapter 2, Section 205, Table 2.1, Use Table for Standard Land Use Districts of the Land Development Code (LDC) lists barrack style farmworker housing as a conditional use requiring a Level 3 Review. Chapter 3, Section 303, Criteria for Conditional Uses for Barrack Style Farmworker Housing states that “*as part of its review in A/RR, RCC-R, RS and PM, the Planning Commission shall consider the other design features required for Apartment Style Farm Worker Dormitories as potential conditions of approval*” for barrack style farmworker housing. Also, “*additional consideration shall be given to proximity to potential employment sites and worker access to goods and services.*” The proposed conversion of this former state-run alternative school into farmworker housing incorporates some of the apartment style farmworker housing requirements such as the onsite indoor and outdoor recreation facilities, laundry, visual buffers, and access drives. The location is also in close proximity to goods and services within Bradley Junction and even mass transit services.

Table 9

Comprehensive Plan Policy	Consistency Analysis
<p>POLICY 2.102-A2: COMPATIBILITY - 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; 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.</p>	<p>Staff finds the modification to the previously approved barrack style farmworker housing is compatible with neighboring properties and there is adequate infrastructure to support it as well. It’s on a large property setback from surrounding residential development buffered with canopy trees surrounding the facility. The primary building was constructed as a dormitory. The facility previously housed a similar quantity of at-risk youth.</p>

Comprehensive Plan Policy	Consistency Analysis
POLICY 2.102-A1: DEVELOPMENT LOCATION – 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.	There are infrastructure and services available in this area to support the farmworker housing facility such as potable water, public safety, mass transit, and access to convenience goods.
POLICY 2.102-A3: DISTRIBUTION - Development shall be distributed throughout the County consistently with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized; and compact, high-density and intensity development is located where urban services can be made available.	This site has potable water services, fire rescue nearby, and mass transit services.
POLICY 2.102-A4: TIMING - The development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services which, at a minimum, shall require compliance with the Plan's Level of Service requirements and the County's concurrency management system.	The site is located within an area that is bordered by residential development where there is a higher level of public services.
POLICY 2.102-A15: ADEQUATE PUBLIC FACILITIES - The County will direct new growth to areas where adequate public facilities exist or are planned; and ensure that essential services are in place to provide for efficient, cost-effective response times from the Fire Department, Sheriff's Department, and Emergency Management Service (EMS).	The subject property is located within an area of the County that has adequate public safety services. There is a fire rescue station less than ½ mile driving distance from the facility.

The Planning Commission, in the review of development plans, shall consider the following factors listed in Table 10 in accordance with Section 906.D.7 of the Land Development Code.

Table 10

The Planning Commission, in the review of development plans, shall consider the following factors in accordance with Section 906.D.7 of the LDC:	
Whether the proposed development is consistent with all relevant requirements of this Code;	<i>Yes, this request is consistent with the LDC, specifically Sections 303 and 906.D.</i>
Whether the proposed development is consistent with all applicable policies of the Comprehensive Plan;	<i>POLICY 2.114-A3.c lists "Agriculture and Farmworker housing under specific design parameters listed in the Land Development Code not to exceed an intensity of sixteen (16) workers per acre" as a permitted use in the Phosphate Mining Future Land Use Map district. The applicant is proposing less than half of what they're eligible for on this site.</i>
Whether the proposed use is compatible with surrounding uses and the general character of the area, including such factors as density, height, bulk, scale, intensity, traffic, noise, and appearance; and	<i>Yes, the request is compatible with surrounding land uses and the general character of the area. See Pages 5&6 of this staff report for data and analysis on surrounding uses and compatibility. There is a lot of separation and existing vegetation between this facility and the nearest residential neighbors.</i>
How the concurrency requirements will be met, if the development were built.	<i>The former use of the property has some concurrency vesting and there is available capacity for roadways and potable water in this location.</i>

The request meets all the conditions in Section 303 of the LDC for barrack style farmworker housing in a PM land use district including the maximum number of farmworkers, proximity to employment sites, and access to goods and services.

Comments from other Agencies: Polk County Land Development Engineering and the Polk County Public Safety Division contributed to the drafting of this report.

Exhibits:

- Exhibit – 1 Location Map
- Exhibit – 2 Future Land Use Map
- Exhibit – 3 2021 Satellite Photo (Context)
- Exhibit – 4 2022 Satellite Photo (Close-up)
- Exhibit – 5 Site Plan



Location Map



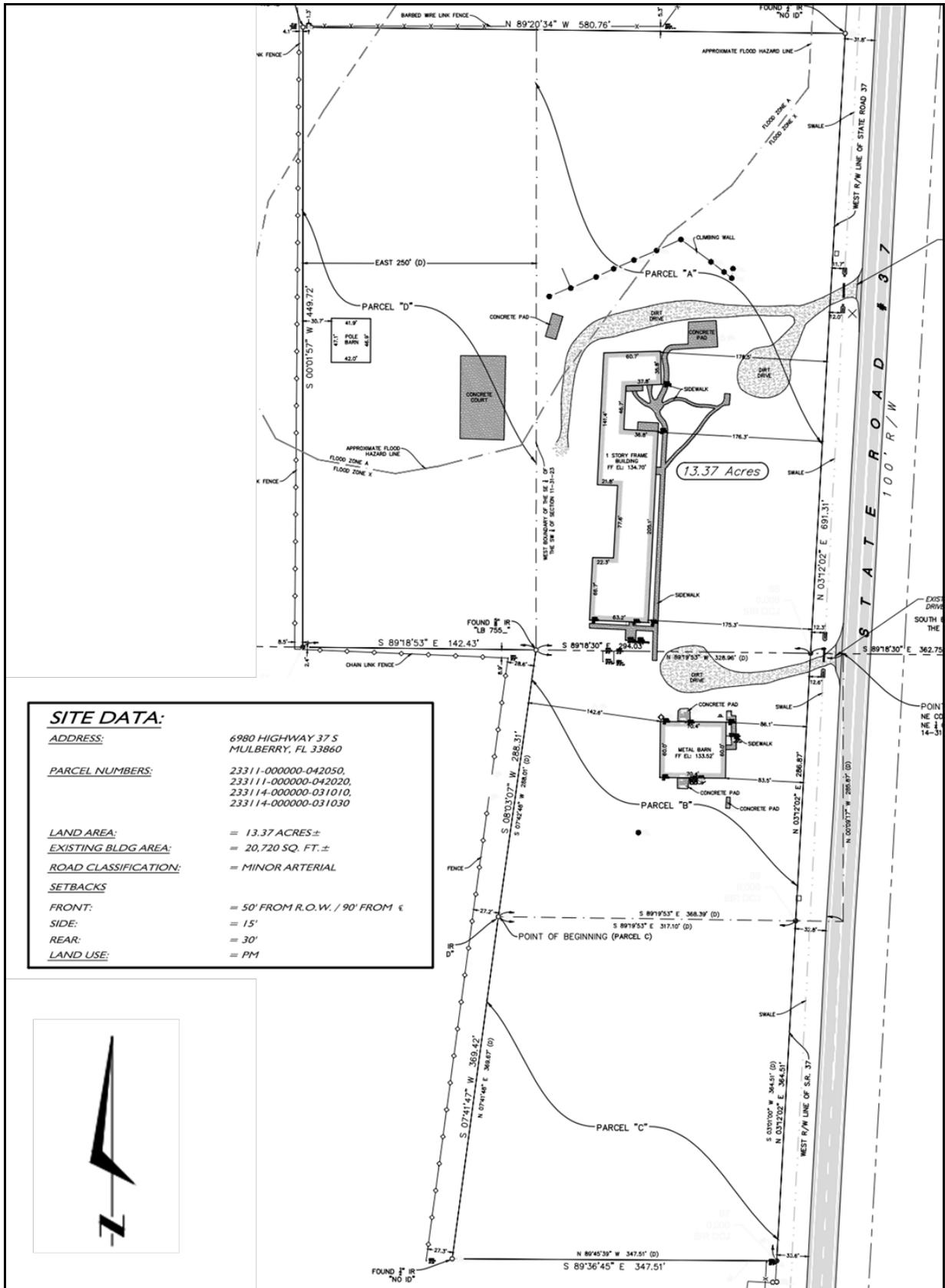
Future Land Use Map



2024 Satellite Photo (Context)



2024 Satellite (Close Up)



Site Plan