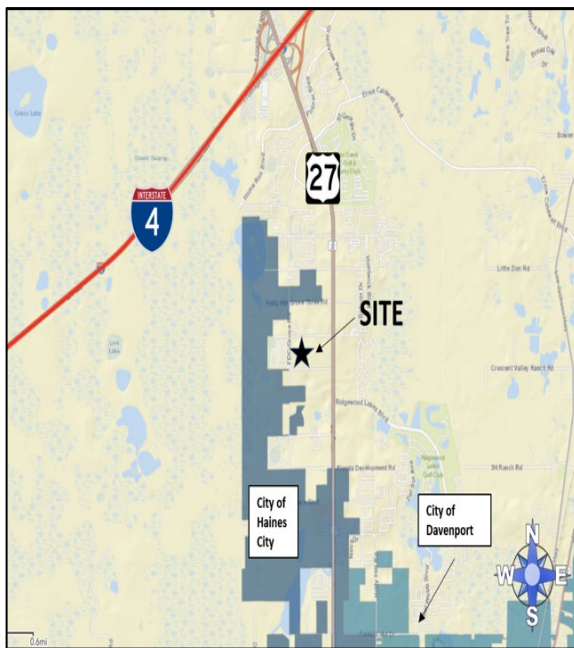
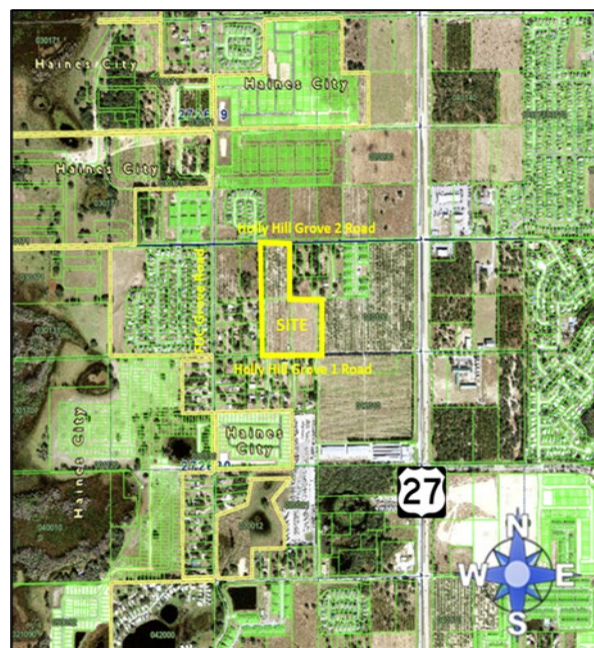


POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

DRC Date:	April 24, 2025
Planning Commission Date:	July 9, 2025
BoCC Dates:	August 5, 2025, December 16, 2025
Applicant:	William Maki, RLA
Level of Review:	Level 4 Review, Large-Scale Comprehensive Plan Amendment
Case Number and Name:	LDCPAL-2025-1 (GPK Holly Hill Groves 2)
Request:	Future Land Use Change from Employment Center - X (ECX) to Residential-High - X (RHX).
Location:	West side of US 27, South of Holly Hill Grove Road 2, North of Holly Hill Grove Road 1, East of the City of Haines City, in Section 30, Township 26, Range 27.
Property Owner:	Oak Bend Investment LLC, Lynnway Armstrong LLC
Parcel Size:	14.6 +/- acres
Development Area:	Transit-Supportive Development Area (TSDA)
Future Land Use:	Employment Center - X (ECX)
Nearest Municipality	Haines City
DRC Recommendation:	Approval
Planning Commission Vote:	Approval (4:3)
Florida Commerce:	No Objections
Case Planner:	Mark J. Bennett, AICP, FRA-RA, CNU-A, Senior Planner



Location Map



Aerial Photo

Summary:

This is an applicant-initiated Comprehensive Plan map amendment to change 14.6 acres from Employment Center - X (ECX) to Residential-High - X (RHX) on the Future Land Use Map.

Compatibility Summary

The site is undeveloped and vacant. Apartments and townhomes are north and northeast of the site. Property east of the site is vacant and is the future location of a Wal-Mart and Sam's Club store. Single-family residences of various densities are to the northwest, west, and south of the site. Given the property's location next to existing apartments and proximity to an intensive planned commercial activity (the Walmart/Sam's Club retail complex) a change to a more intensive, higher-density residential designation (such as Residential-High) would be compatible with existing development already in the area.

Infrastructure Summary

Because the site is the Transit-Supportive Development Area, connection to public water and wastewater services is required. Public safety facilities and services are available. Portions of Holly Hill Grove 1 Road east of the site were recently closed as part of the development of the Wal-Mart and Sam's Club project. There is inadequate road capacity on this portion of US 27, and the zoned elementary & high schools are over capacity.

Environmental Summary

The subject property is in the Green Swamp Area of Critical State Concerns. There are no significant environmental constraints (wetlands, floodplains, animal species). Environmental lands are located approximately 1/3 mile west of the site.

Comprehensive Plan

Listed below are the relevant sections of the Comprehensive Plan that are applicable to this request:

- Policy 2.102(A1-A15): Growth Management Policies
- Policy 2.104(A1-A9): Transit-Supportive Development Areas
- Policy 2.119-A2: Location Criteria (Residential Land Uses)
- Policy 2.120(E1-E4): Residential-High
- Section 2.131-Q: North Ridge Selected Area Plan
- Appendix 2.132: Critical Area Resource Management Plan
- Section 2.132-B: Ridge Special Protection Area (Ridge SPA)

Findings of Fact

Request and Legal Status

- LDCPAL-2025-1 is an applicant-initiated request for a Comprehensive Plan Amendment (CPA) to designate approximately 14.6 acres from Employment Center - X (ECX) to Residential-High - X (RHX).
- The property is vacant and undeveloped.

Compatibility

- The Comprehensive Plan defines Compatibility in Section 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 subject property is currently in a Transit-Supportive Development Area (TSDA).
- TSDAs are unincorporated areas within the County where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed-use development.
- The site is also within the area covered by the North Ridge Selected Area Plan.
- The site is within an Employment Center - X (ECX) land use.
- Surrounding land uses include Residential-High - X (RHX), Professional Institutional - X (PIX), and Employment Center - X (ECX).
- The subject property was previously designated as residential and was changed to Employment Center – X as part of the North Ridge SAP expansion in the mid-2000s.
- The uses of adjacent property include apartments and town homes north and northeast of the site, vacant property is east of the site and is the future location of a Wal-Mart and Sams store. Single-family residences of various densities are northwest, west, and south of the site.

Infrastructure

- The property is zoned for Bella Citta (Elementary/Middle), and Ridge Community Senior High.
- According to the Polk County School Board, there is insufficient elementary and high school capacity at the zoned schools for this site.
- Fire and ambulance response is provided from Polk County Fire Rescue Station 38, located at 126 Cottonwood Drive, Davenport, .6 mile away. The estimated response time is 3 minutes.

- The sheriff's response to the site is served by the Northeast District, located at 1100 Dunson Road, Davenport. The response times for June 2025 were: Priority 1 – 12:25 minutes, Priority 2 – 30:00 minutes.
- The site is located within the County Northeast Utility Service Area.
- Based on current capacities and projected improvements, there should be sufficient water and sewer capacity to serve this project.
- US 27, located east of the site, does not have available capacity to serve this development.
- Holly Hill Grove Road 2 is a County-maintained Urban Collector with a surface width of 20 feet, and a Pavement Condition Index of "Fair."
- Holly Hill Grove Road 1 is a County-maintained Local Residential road. Although listed in the Polk County Road Inventory as unpaved with an unspecified pavement width, the road has a hardened surface which is estimated to be 18 feet wide. No Pavement Condition Index information is available.
- Portions of Holly Hill Grove Road 1, east of the site, were recently closed as part of the development of the Wal-Mart and Sam's Club project.

Environmental

- The property is located within the Green Swamp Area of Critical State Concern.
- There are lands about .38-mile east of property that have conservation easements.
- The subject property is identified as being within a potential network connection on the Polk Green Districts Map.
- The site is comprised of Candler fine sand.
- Candler fine sand has slight limitations for septic tank usage and dwellings without basements.
- According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within a mile of an eagle's nest, rookery, or protected animal species.
- This property is not within an Airport Impact District.
- The site is not within a Wellfield-Protection District.
- There are no archeological or historic resources on the site.

Comprehensive Plan Policies

- 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.

- POLICY 2.102-A2 Compatibility states that 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.
- POLICY 2.102-A3 Distribution states that 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.
- POLICY 2.102-A4 Timing states that 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.
- POLICY 2.102-A10 Location Criteria states 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;
 - b. nearness to agriculture-production areas;
 - c. distance from populated areas;
 - d. economic issues, such as minimum population support and market-area radius (where applicable);
 - e. adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development, including, but are not limited to:
 1. transportation facilities, including but not limited to, mass transit, sidewalks, trails and bikeways;
 2. sanitary sewer and potable water service;
 3. storm-water management;
 4. solid waste collection and disposal;
 5. fire protection with adequate response times, properly trained personnel, and proper fire-fighting equipment;
 6. emergency medical service (EMS) provisions; and

7. other public safety features such as law enforcement;
 8. schools and other educational facilities
 9. parks, open spaces, civic areas and other community facilities
- f. environmental factors, including, but not limited to:
1. environmental sensitivity of the property and adjacent property;
 2. surface water features, including drainage patterns, basin characteristics, and flood hazards;
 3. wetlands and primary aquifer recharge areas;
 4. soil characteristics;
 5. location of potable water supplies, private wells, public well fields; and
 6. climatic conditions, including prevailing winds, when applicable.
- POLICY 2.104-A1: Description, states that Transit Supportive Development Areas shall meet the following criteria:
 - a. be those areas where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed use development;
 - b. be supported by existing or planned urban type services that are programmed or expected for the 10-year planning horizon;
 - c. be designated as part of a coordinated land use and transportation strategy that supports the provision of improved and expanded transit services, as identified in the Transportation Planning Organization (TPO) 2060 Transportation Vision Plan and the connecting circulator routes, in order to increase mobility and travel options;
 - d. include development criteria that:
 1. promote the development of walkable communities which include a balance between employment opportunities, mix of complementary uses and activities, and a range of housing opportunities;
 2. improve access to employment areas, schools, shopping and recreational opportunities.
 - POLICY 2.104-A3 lists the allowed land use categories that are permitted within TSDAs, in accordance with applicable criteria:
 - a. **ACTIVITY CENTERS:** Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, Employment Centers and High-Impact Commercial Centers.
 - b. **RESIDENTIAL:** Residential-High, Residential-Medium, and Residential-Low Districts.
 - c. **OTHER:** Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Office Centers, Leisure Recreation, Mixed Use, Institutional, Professional Institutional, Recreation and Open Space, Preservation.

Note: Some land use categories are only allowed in adopted Selected Area Plans, special areas or neighborhood plans as specified in the definitions in Section 2.109.

- POLICY 2.119-A2, Location Criteria, states that 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 2.120-E1, Residential-High Characteristics, states that the Densities are allowed up to, and including, 15.00 DU/AC. The Residential-High classification is characterized by multi-story, multi-family units.
- POLICY 2.120-E2, Designation and Mapping, states that Residential-High districts shall be located within TSDAs, UGAs, and UEAs as designated on the Future Land Use Map Series as "RH."
- POLICY 2.120-E3, Location Criteria, states that Residential-High areas shall be located only within TSDAs, UGAs, and UEAs and may be located within Activity Centers. The placement of Residential-High shall be evaluated based on the general criteria listed in Policy 2.119-A2.
- POLICY 2.120-E4, Development Criteria, states that residential development may contain a variety of housing types as defined by the Land Development Code and shall be permitted at a density of up to 15 DU/AC. Multi-family structures may contain non-residential uses to provide support retail and personal services for the residents. Additionally, educational facilities are permitted in accordance with policies of this Plan.
- North Ridge Selected Area Plan Policy 2.131-Q2: Land Use Categories Established, states that Residential High (RHX) shall apply in this SAP.
- North Ridge Selected Area Plan Policy 2.131-Q4, K, Modified Use (Residential High (RHX), states that this classification is the same as defined in Section 2.120-E of this Plan, except that the minimum and maximum residential density shall be according to the North Ridge SAP density credit table as established by Policy 2.131-Q7 of this SAP and per the Land Development Code.
- Critical Area Resource Management Plan POLICY 2.132-B3, Land Use Categories, states that Residential-High is permitted within the RIDGE-SPA.
- Critical Area Resource Management Plan POLICY 2.132-B10b. Development Criteria, states that - Development within the RIDGE-SPA shall conform to the following for Residential-High: Commercial development shall be prohibited unless permitted in conjunction with a Residentially-Based, Mixed-Use Development or a Residentially-Based Mixed-Use Structure. If a Residentially-based, Mixed-Use Development or Residentially-Based, Mixed-Use Structure is approved, then commercial restrictions shall be as set forth in the Ridge-SPA and the North US 27 SAP; and, consistent with the objectives and goal of

making shorter the average daily trip lengths, and the goal of providing affordable housing in close proximity to places of employment and major transportation corridors, residential development within the RH parcel shall be allowed a maximum of 20 du/ac, providing the development meets the terms and conditions of this CARMP and Comprehensive Plan.

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 LDCPAL-2025-1**.

Planning Commission Recommendation: On July 9, 2025, in an advertised public hearing, the Planning Commission voted (4:3) to **recommend APPROVAL of LDCPAL-2025-1**.

Board of County Commissioners Recommendation: On August 5, 2025, in an advertised public hearing, the Board of County Commissioners voted (5:0) to **recommend APPROVAL of LDCPAL-2025-1**.

Department of Economic Opportunity: The Department of Economic Opportunity did not have any comments in their Objections, Recommendations and Comment Report (ORC 25-06ACSC).

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: 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.

Compatibility with the Surrounding Uses

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. Compatibility is defined in the Comprehensive Plan 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."

A. Land Uses:

The subject property is currently in a Transit-Supportive Development Area (TSDA). These are unincorporated areas within the County where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed-use development.

The site is also within the area covered by the North Ridge Selected Area Plan. This Selected-Area Plan was adopted in recognition that this area of Polk County is expected to experience a high degree of development over the next twenty years.

The site is within an Employment Center - X (ECX) land use. There is a mixture of different land uses adjacent to this property, such Residential-High - X (RHX), Professional Institutional X (PIX), and Employment Center - X (ECX).

The site is currently undeveloped and vacant. Apartments and townhomes are north and northeast of the site. Property east of the site is vacant and is the future location of a Wal-Mart and Sam's Club store. Single-family residences of various densities are to the northwest, west, and south of the site.

Portions of Holly Hill Grove Road 1, east of the site, were recently closed as part of the development of the Wal-Mart and Sam's Club project. The closure of portions of this road, and the subsequent elimination of its connection to US 27, changed the character of the area.

Given the property's location next to existing apartments and proximity to an intensive planned commercial activity (the Walmart/Sam's Club retail complex) a change to a more intensive, higher-density residential designation (such as Residential-High) would be compatible with the recent development already in the area and planned future development.

B. Infrastructure:

According to Comprehensive Plan 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.”

The site is in a Transit-Supportive Development Area. New development is required to connect to public water and wastewater services, which are offered by Polk County. Emergency services are in a reasonable distance. There is not adequate traffic capacity on US 27, and the zoned elementary and high schools for this site do not have any capacity.

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

Table 1

Northwest Employment Center X (EC X) Single-family residential (Country Walk Estates)	North Residential-High X (RH X) Holly Hill Grove Apartments	Northeast Residential-High X (RH X) Employment Center X (EC X) Low density residential, townhomes, undeveloped
West Employment Center X (EC X) Institutional-1 X (INST-1X) Single-family residential, vacant	Subject Site Employment Center X (EC X) Vacant	East Employment Center X (EC X) Citrus grove (Future Wal-Mart/Sam’s Club)
Southwest Professional Institutional X (PIX) Single-family residential	South Professional Institutional X (PIX) Single-family residential	Southeast Employment Center X (EC X) Citrus grove (Future Wal-Mart/Sam’s Club)

Nearest and Zoned Elementary, Middle, and High School

The schools zoned for the subject property are listed in Table 2 below. Because the request is for a residential use, the request will impact school concurrency. Using a gross density of 20 units per acre (the maximum density for Residential-High, as outlined in Table 4.18, Density Limits for North Ridge SAP) multiplied by 14.6 acres results in a maximum unit count of 292 units. The annual estimated demand listed below is based on this 292-unit figure.

The property is zoned for Bella Citta (Elementary/Middle), and Ridge Community Senior High.

In a letter dated April 25, 2025, School Board staff provided a concurrency analysis. Listed below are excerpts from that letter. The entire letter is included as an exhibit to this report.

Elementary School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Bella Citta (Zoned)	980	1,053	246	292 MF	36	No (-173)
Citrus Ridge (Adjacent)	517	624	297	292 MF	36	No (-190)
Horizons (Adjacent)	1,540	1,594	150	292 MF	36	No (-96)
Loughman Oaks (Adjacent)	1,179	1,420	422	292 MF	36	No (-181)

Middle School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Bella Citta (Zoned)	447	770	160	292 MF	18	Yes (+133)
Citrus Ridge (Adjacent)	582	981	200	292 MF	18	Yes (+199)

High School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Ridge Community (Zoned)	2,626	2,848	378	292 MF	22	No (-156)
Auburndale (Adjacent)	1,787	2,404	561	292 MF	22	Yes (+56)

Source: April 25, 2025, Letter from Polk County Public Schools

These tables show that there is not adequate elementary or high school capacity available to serve a development on this site at the maximum permitted density of 20 units per acre. Because the schools in this area are overcapacity, the provision of Section 703 (Concurrency), specifically Section O (School Concurrency) shall apply. The applicant may need to enter into a mitigation agreement as outlined in this section to ensure that adequate school capacity is in place.

Nearest Sheriff, Fire, and EMS Station

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

Sherriff 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. Priority 1 Calls are considered true emergencies, in-progress burglary, robbery, injuries, etc. Priority 2 Calls refer to events that have already occurred, such as a burglary that occurred while the homeowner was on vacation and had just been discovered.

Table 3 provides a breakdown of response times and travel distances for emergency services.

Table 3 Public Safety Information

	Name of Station	Distance	Response Time*
Sheriff	Northeast District, located at 1100 Dunson Road, Davenport	± 3 miles	P1: 12:25 minutes P2: 30:00 minutes
Fire/ EMS	Polk County Fire Rescue Station 38, located at 126 Cottonwood Drive, Davenport	±0.6 mile	3 minutes
<i>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.</i>			

Additional information regarding Fire/EMS service is provided by Michael Linkins, CPM, Fire Rescue Division Project Coordinator:

“There is a traffic preemption system at the intersection of Cottonwood Drive and US Highway 27 that is utilized to reduce emergency response travel times and improve safety. The Cottonwood station is staffed 24/7 with career firefighters and augmented by response from surrounding Polk County fire stations and through an interlocal automatic aid agreement with the City of Haines City.

Over the last three years, there are no records of any responses to this site, but there were some to adjacent properties and the most recent response times are:

- 04/08/2025 112 Holly Village Dr 5:25 minutes
- 03/06/25 112 Holly Village Dr 7:15 minutes
- 02/28/25 672 Lobelia Dr 6:11 minutes

Please note that response times can vary significantly based on many factors.”

Water and Wastewater

Because development in the Transit-Supportive Development Area (TSDA) is required to connect to public water and sewer facilities, the proposed Comprehensive Plan Amendment will have an impact on these systems. According to the Polk County Utilities Data Viewer, there is an 8-inch water line and 6-inch sewer line along Holly Hill Grove Road 2, north of the site. There are no water, sewer, or reclaimed water lines along Holly Hill Grove Road 1.

A. Estimated Demand

The development of the property under the proposed land use designation may negatively impact the minimum LOS for the existing facilities. The analysis is based on a worst-case estimate for 292 apartment units (14.6 acres @ 20 units/acre).

Table 4 Estimated Water and Sewer Impact Analysis

Maximum Allowable Use: 292 multi-family residential units 14.60 Acres	Estimated Impact Analysis: Employment Center - X (ECX) to Residential-High - X (RHX) <i>Development Area: TSDA</i>	
	Current Land Use designation ECX	Maximum Permitted Use in Proposed RHX
Current Maximum Allowable Use	14.6 acres * (10 DU/acre = 146 DUs) 146 DUs	292 DUs
Potable Water Consumption	146 DU * 198 GPD/DU = 28,908 GPD	292 DUs * 198 GPD/DU = 57,816 GPD
Wastewater Generation	146 DU * 180 GPD/DU = 26,280 GPD	292 DUs * 180 GPD/DU = 52,560 GPD

DU – Dwelling Units; GPD – Gallons Per Day;

Source: Polk County Concurrency Manual and Polk County Utilities: multi-family @ 198 GPD Potable water and 180 Wastewater

B. Available Capacity:

Polk County Utilities is the service provider for this property, which is in the Northeast Utility Service Area. Listed below are the current flows and permitted capacity data, based on the Polk County Utilities Capacity Summary Table, compiled in June 2024:

Water

Flow - 10.654 MGD

Permit – 12,940 MGD

Northeast PWS permit increase: 2028 - 0.41 MGD from Southeast Wellfield, 2029 - 1.20 MGD from Cypress Lake Wellfield, and 2033 - 1.0 MGD from Holly Hill LFA deep well.

Sewer:

Flow - 5.459 MGD

Permit – 6.00 MGD

Northeast Regional WWTF is planned to increase permit capacity to 7.0 MGD in 2026 and 9.0 MGD in 2028.

MGD – Million Gallons per Day

Based on existing flows and future improvements, there should be sufficient capacity to serve a 202-unit apartment project.

C. Planned Improvements:

Other than the capacity improvements for the Northeast Utility Service Area already mentioned, there are no planned improvements to utilities in this area.

Roadways/ Transportation Network

The Polk County Transportation Planning Organization (TPO) monitors traffic congestion on over 425 roadway segments (950 directional links). The data identifies both daily and peak hour traffic volumes. The peak hour traffic volumes are used to estimate the level-of-service for each roadway, in each direction. Level-of-service refers to the quality of traffic flow. It is the primary measure of

traffic congestion. Level-of-service (LOS) is measured on a scale of ‘A’ to ‘F’ with LOS ‘A’ being the best (free-flow traffic) and LOS ‘F’ being the worst (severe traffic congestion).

The proposed Comprehensive Plan Amendment is anticipated to affect surrounding roadways or transportation network. The Amendment will not change the LOS below the minimum established standards because the LOS standard of “D” for this portion of US 27 has already been exceeded.

A. Estimated Demand

Table 5, following this paragraph, shows the Average Annual Daily Trip (AADT) rate and the PM Peak hour trip rate. The analysis is based on a worst-case estimate for 292 apartment units (14.6 acres @ 20 units/acre).

Table 5 Estimated Transportation Impact Analysis

Maximum Allowable Use: 292 multi-family residential units 14.60 Acres	Estimated Impact Analysis: Employment Center - X (ECX) to Residential-High - X (RHX) <i>Development Area: TSDA</i>	
	Current Land Use designation ECX	Maximum Permitted Use in Proposed RHX
	14.6 acres * (10 DU/acre = 146 DUs) 146 DUs	292 DUs
Average Annual Daily Trips (AADT)	146 DU * 4.54 trips/DU = 663 AADT	292 DU * 4.54 trips/DU = 1,326 AADT
PM Peak Hour Trips	146 DU * .39 trip/DU = 57 AADT	292 DU .39 trip/DU = 114 AADT

Source: Concurrency Manual and Table for Minor Traffic Study –Multi-family (mid-rise) Between three and ten floors) – 4.54 AADT per unit and .39 PM Peak Hour per unit 100% new trips

B. Available Capacity:

US 27, located east of the site, does not have available capacity to serve this development. The roads surrounding the subject site should have sufficient capacity available, depending on the eventual use and full build out of the site. The Polk Transportation Planning Organization (TPO) monitors certain roadways based on maximum approved traffic in comparison to current vehicle trips to determine what capacity is available.

Table 6, charts the generalized available capacity of the closest links that is monitored in the Roadway Network Database:

Table 6 Available Capacity

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard	5-Year Peak Hour Projected LOS
5110N	US 27 From CR 547 to I-4	F	-285	D	F
5110S	US 27 From CR 547 to I-4	F	-155	D	F

Source: Polk County Transportation Planning Organization, Concurrency Roadway Network Database January 17, 2025

As identified above, this portion of US 27 does not have sufficient PM peak hour capacity to support future development activity at the maximum permitted density of 20 units per acre. Because US 27 is overcapacity, the provision of Section 703 (Concurrency), specifically Section N (Transportation Proportionate Fair-Share Program) shall apply. The applicant may need to enter into a mitigation agreement as outlined in this section to ensure that the impacts of development on transportation facilities are mitigated.

C. Roadway Conditions

Holly Hill Grove Road 2 is a County-maintained Urban Collector with a surface width of 20 feet, and a Pavement Condition Index of “Fair.”

Holly Hill Grove Road 1 is a County-maintained Local Residential road. Although listed in the Polk County Road Inventory as unpaved with an unspecified pavement width, the road has a hardened surface which is estimated to be 18 feet wide. No Pavement Condition Index information is available for this road.

Portions of Holly Hill Grove Road 1, east of the site, were closed on November 20, 2024, as part of the development of the Wal-Mart and Sam’s Club project. This road was subsequently shortened by 1,364 feet.

D. Planned Improvements:

There are no known improvements proposed in this area.

E. Mass Transit

There is transit within a reasonable distance of the site. The closest route is Route 20X – Haines City/Davenport Express. This route travels on US 27, which is about .3 miles east of the site. Based on a review of Google Maps, no bus stops were identified along the west side of US 27 within ¼ mile of the US 27/Holly Hill Grove Road 2 intersection.

F. Sidewalks

There is a sidewalk along the north side of Holly Hill Grove Road 2, next to the Aventon Grove Apartments. No sidewalks currently exist along Holly Hill Grove Road 1.

Park Facilities and Environmental Lands:

There are limited County Park facilities in this area. The Loma Linda Park is a County owned facility, and is 3.88 miles northeast of the site. Further to the northeast is the Loughman Park, located 6 miles northeast of the site, and the Northeast Regional Park is located 9 miles north of the site on the east side of US 27.

A. Location:

The Loma Linda Park is located at 169 Alta Vista Court, Davenport. 33837. The Loughman Park is at 6302 Old Kissimmee Road, Davenport, 33896, and the Northeast Regional Park is located at 50901 US 27, Davenport, 33897.

B. Services:

The Loma Linda Park contains a playground. The Loughman Park has a playground with swings and slide. It also has a covered picnic pavilion, soccer and basketball fields, and leagues utilize the park. The Northeast Regional Park includes six artificial turf multipurpose fields for soccer, football and lacrosse, four artificial turf baseball/softball fields, league play, a concession stand, playground, tennis courts, racquetball courts, basketball courts, a screened-in pavilion (which is available to rent), picnic shelters, an exercise trail and a dog park. It also features a boat launching site and bank and pier fishing.

C. Multi-use Trails:

The eastern boundary of the Hilolchee Wildlife Management Area Osprey Unit, a 6,093-acre site, is located .75 miles west of the site. This area has improved roads that are available for hiking, plus trails that are not accessible for vehicles. The closest trailheads (for the East and Corridor Trails) within this Area that is located at the end of Home Run Boulevard, 1.33-miles (straight-line distance) northwest of the site.

Environmental Lands:

The subject site is .38 miles east of property identified as part of the Green Swamp Land Authority Land Protection Agreement. It also has a conservation easement, according to the Polk County Property Appraiser. The property is also in a potential Network Connection for Natural Areas and Parks, based on the Polk Green Districts Map.

Environmental Conditions

The site is undeveloped and consists of vacant pasture and former citrus groves. There are no wetlands or flood zones on the site, nor are there protected species that have been identified. The site consists of Candler fine sand, a soil with slight limitations for septic tank usage and dwellings without basements.

The site is also within the Green Swamp Area of Critical State Concern. The site is also located within the Ridge Special Protection Area (SPA), as contained in Appendix 2.132 (Critical Area Resource Management Plan) and Section 2.132-B (Ridge Special Protection Area (Ridge SPA)) of the Comprehensive Plan. These provisions have additional development regulations and standards, such an open space requirement of 40%, to ensure protection of the natural resources in this area.

A. Surface Water:

Based on a review of aerial photos and a site visit, there are no surface water features on this site. The elevation of the site is varied but generally slopes to the north. Elevations range from a high of 190 feet at the center of the site, sloping downward to an elevation of 179 feet at the northwest of the property, and 172 feet at the in the southwest corner of the site.

B. Wetlands/Floodplains:

There are no wetlands of floodplains on this site.

C. Soils:

The site is comprised of Candler fine sand. This soil has slight limitations for septic tanks and dwellings without basements, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey.

Table 7, below, lists the soils associated with the subject site.

Table 7 Soils

Soil Name	Septic Tank Absorption Limitations	Field	Limitations to Dwellings without Basements	% of Site (approximate)
Candler fine sand	Slight		Slight	100%

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

Any 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.

D. Protected Species

According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within a mile of an eagle’s nest, rookery, or protected animal species. Prior to site clearing or grubbing, the applicant shall hire a qualified professional to conduct a site survey/walkover to ensure that no threatened or endangered plant or animal species exist on the site. If any are discovered, the applicant shall properly protect the specie(s) or mitigate any impacts consistent with federal, state, and local law.

E. Archeological Resources:

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.

F. Wells (Public/Private)

The site is not within a Wellfield Protection District.

G. Airports:

This property is not within an Airport Impact District.

Economic Factors:

Construction of buildings and site development activities create temporary jobs. Any new residential development that occurs at this site will need more goods and services, thereby generating more economic activity.

Consistency with the Comprehensive Plan

Many policies within the Comprehensive Plan are reviewed for consistency with an application. The most relevant policies for the proposed request are included in this section. 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. How the request is **consistent** with the Comprehensive Plan is listed below:

Table 8 Comprehensive Plan

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;</p> <p>b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use;</p> <p>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>Most of the adjacent properties are developed with residential uses, with an apartment complex directly north of the site.</p>
<p>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.</p>	
<p>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.</p>	
<p>POLICY 2.102-A10: LOCATION CRITERIA - The following factors shall be taken into consideration when determining the appropriateness of establishing or expanding any land use or development area:</p> <p>a. nearness to incompatible land uses and future land uses, unless adequate buffering is provided,</p> <p>b. nearness to agriculture-production areas;</p> <p>c. distance from populated areas;</p> <p>d. economic issues, such as minimum population support and market-area radius (where applicable);</p> <p>e. adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development, including, but are not limited to:</p> <p>1. transportation facilities, including but not limited to, mass transit, sidewalks, trails and bikeways;</p>	<p>Most of the adjacent properties are developed with residential uses, with an apartment complex directly north of the site. East of the site, there are proposed commercial uses. The recent closure of portions of Holly Hill Grove Road 1 also reduce the viability of the site for Employment Center uses, and therefore make it more appropriate for residential.</p>

Comprehensive Plan Policy	Consistency Analysis
<p>2. sanitary sewer and potable water service;</p> <p>3. storm-water management;</p> <p>4. solid waste collection and disposal;</p> <p>5. fire protection with adequate response times, properly trained personnel, and proper fire-fighting equipment;</p> <p>6. emergency medical service (EMS) provisions; and 7. other public safety features such as law enforcement; 8. schools and other educational facilities</p> <p>9. parks, open spaces, civic areas and other community facilities,</p> <p>f. environmental factors, including, but not limited to: 1. environmental sensitivity of the property and adjacent property;</p> <p>2. surface water features, including drainage patterns, basin characteristics, and flood hazards;</p> <p>3. wetlands and primary aquifer recharge areas;</p> <p>4. soil characteristics;</p> <p>5. location of potable water supplies, private wells, public well fields; and</p> <p>6. climatic conditions, including prevailing winds, when applicable.</p>	
<p>POLICY 2.104-A3 lists the allowed land use categories that are permitted within TSDAs, in accordance with applicable criteria:</p> <p>ACTIVITY CENTERS: Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, Employment Centers and High-Impact Commercial Centers.</p> <p>RESIDENTIAL: Residential-High, Residential-Medium, and Residential-Low Districts.</p> <p>OTHER: Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Office Centers, Leisure Recreation, Mixed Use, Institutional, Professional Institutional, Recreation and Open Space, Preservation.</p>	<p>The proposed Residential-High designation is permitted in the TSDA.</p>
<p>POLICY 2.119-A2, Location Criteria, states that residential land use categories shall be established throughout the County with consideration being given to the following criteria:</p> <ol style="list-style-type: none"> Access to county-maintained roads or roads constructed to County standards. Proximity to Activity Centers. Adequacy of water and sewage disposal systems (public and private). Adequacy and response time for public safety services - fire, police, and emergency medical service. Adequacy of recreation facilities. Proximity of incompatible land uses. Development limitations, and, Urban Sprawl Criteria set forth in POLICY 2.102-A10. 	<p>The site has access to a county-maintained road, has adequate water and sewer capacity available, adequate response time for public safety services, and is in an area planned for urban development. The recent closure of portions of Holly Hill Grove Road 1, east of the site, results in the site being more appropriate for residential (due to the now more restrictive access).</p>

Comprehensive Plan Policy	Consistency Analysis
<p>POLICY 2.120-E3, Location Criteria, states that Residential-High areas shall be located only within TSDAs, UGAs, and UEAs and may be located within Activity Centers. The placement of Residential-High shall be evaluated based on the general criteria listed in Policy 2.119-A2.</p>	<p>The proposed Residential-High (X) request will be in an TSDA.</p>
<p>SECTION 2.132-B - RIDGE SPECIAL PROTECTION AREA (RIDGE-SPA).</p> <p>POLICY 2.132-B2: DEVELOPMENT AREAS - The RIDGE-SPA shall have the following Development Areas as depicted on the County's Development Area Map:</p> <p>a. Transit Supportive Development Area.</p> <p>b. Urban-Growth Area.</p> <p>POLICY 2.132-B3: LAND-USE CATEGORIES - The following land-use categories shall be permitted within the RIDGE-SPA except that the activity centers listed below in the Ridge SPA shall be located at the intersection of arterials and collectors or two arterials:</p> <p>A. Activity Centers:</p> <ol style="list-style-type: none"> 1.Business-Park Center 1 X (BPCX). 2.Tourist Commercial Center 1 X (TCCX). 3.Town Center (TC). 4.Office Center 1 X (OCX) 5.Employment Center 1 X (ECX). 6.Neighborhood Activity Center (NACX). 7.Professional Institutional 1 X (PIX). 8.Community Activity Center 1 X (CACX). 9.Regional Activity Center [3]X (RACX) <p>b. Residential:</p> <ol style="list-style-type: none"> 1.Residential-Low (RL). 2.Residential-Medium (RM). 3.Residential-High (RH). 	<p>The subject property for Residential-High is within the RIDGE-SPA.</p>

Urban Sprawl Analysis

After analyzing the primary indicators of Urban Sprawl per *Policy 2.109-A10* of the Polk County Comprehensive Plan, it is apparent that the proposed request is not considered urban sprawl based on these criteria and it is permitted in the designated area. Table 9 (below) depicts the Urban Sprawl Criteria used by staff as indicators of Urban Sprawl.

Table 9 Urban Sprawl Criteria

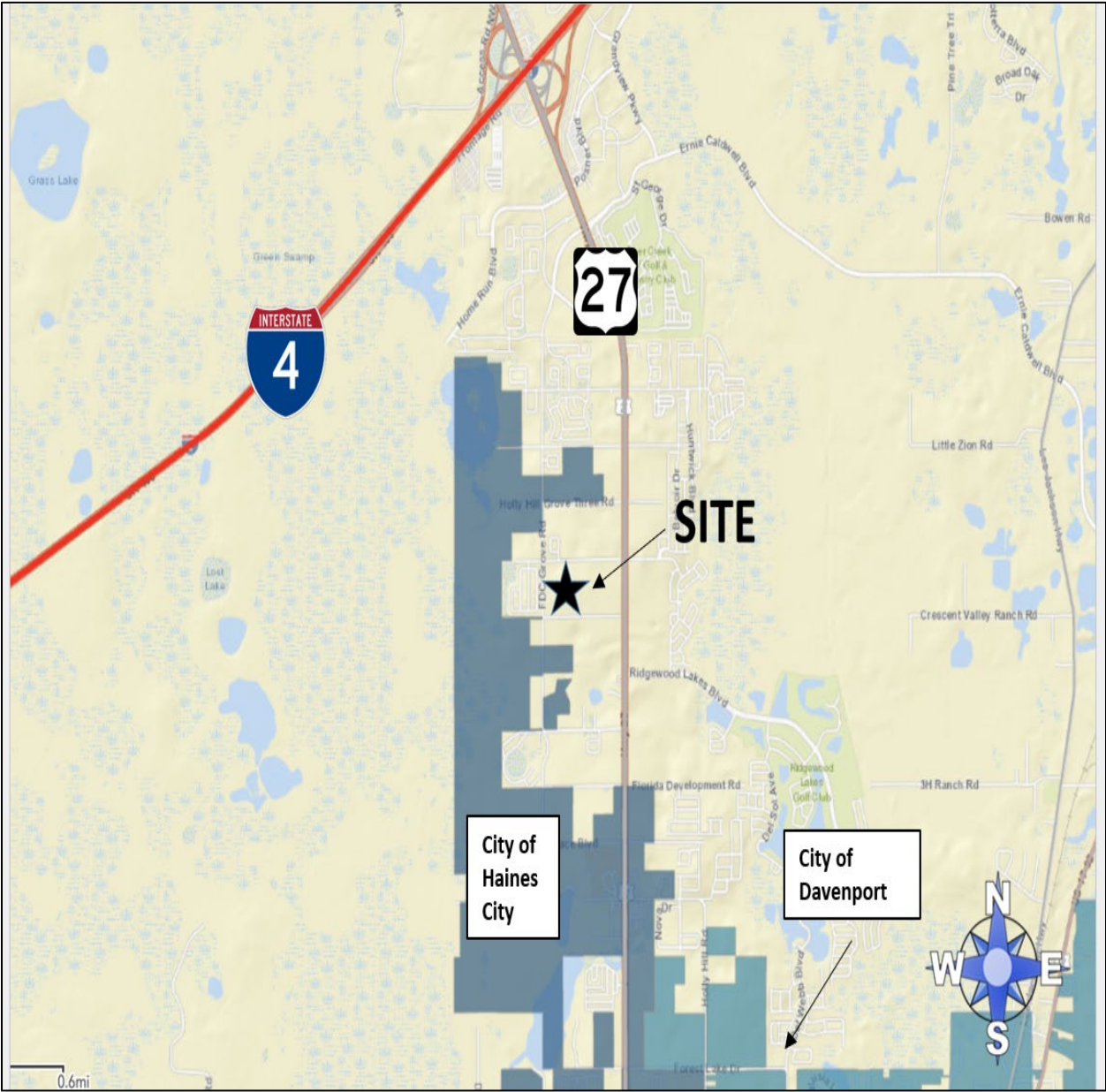
Urban Sprawl Criteria: The following criteria are the primary indicators of urban sprawl per Florida Statutes	
Urban Sprawl Criteria	Sections where referenced in this report
a. <i>Promotes substantial amounts of low-density, low-intensity, or single use development in excess of demonstrated need.</i>	Summary of analysis
b. <i>Allows a significant amount of urban development to occur in rural areas.</i>	Summary of analysis
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>	Summary of analysis, surrounding Development, compatibility
e. <i>Fails to adequately protect adjacent agricultural areas.</i>	Compatibility with Surrounding Land Uses
f. <i>Fails to maximize existing public facilities and services.</i>	Summary of Analysis, Infrastructure
g. <i>Fails to minimize the need for future facilities and services.</i>	Summary of Analysis, Infrastructure
h. <i>Allows development patterns that will disproportionately increase the cost of providing public facilities and services.</i>	Summary of Analysis, Infrastructure
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

Comments from other agencies

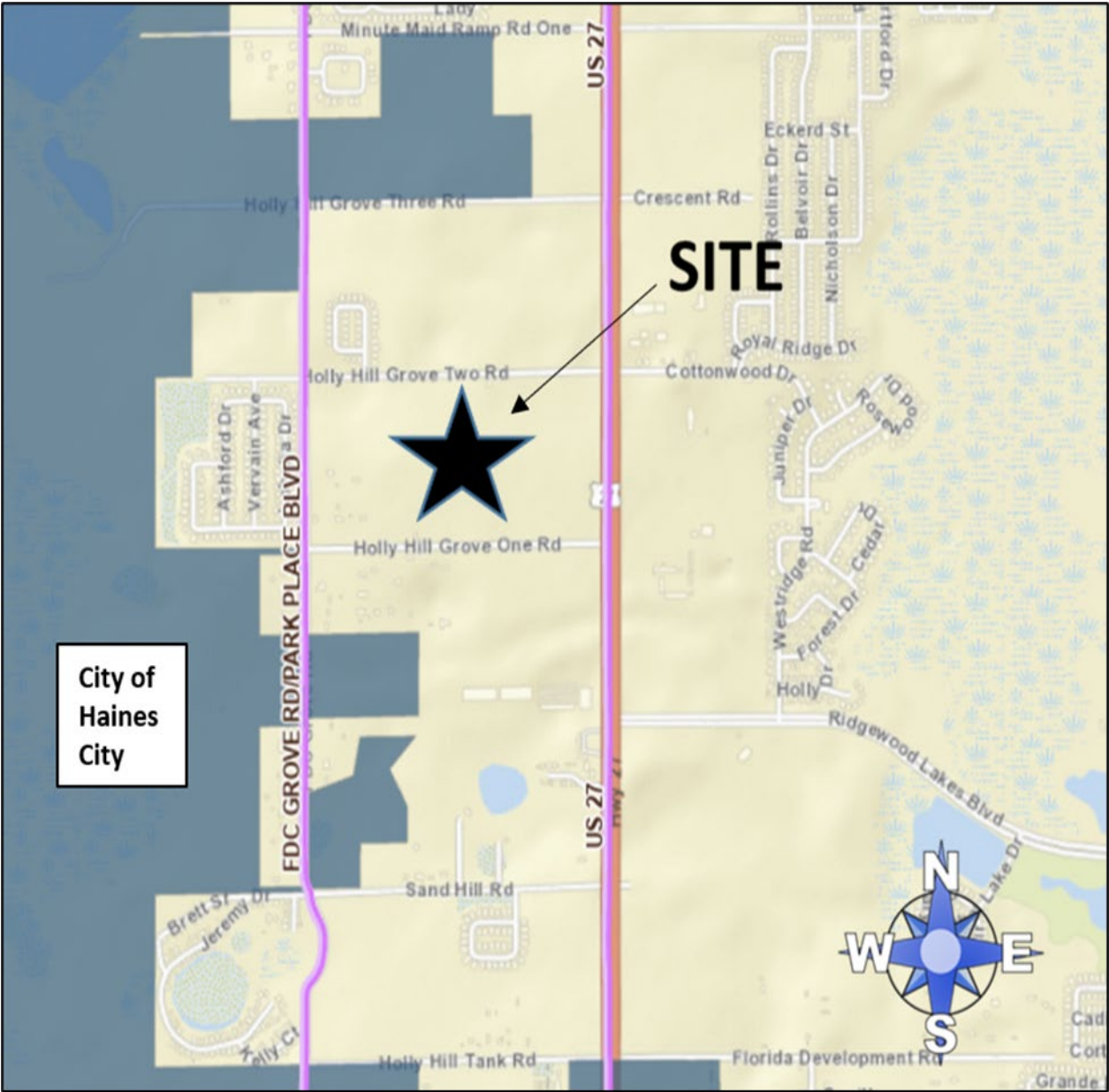
Letter dated April 25, 2025 from Polk County Public Schools

Exhibits:

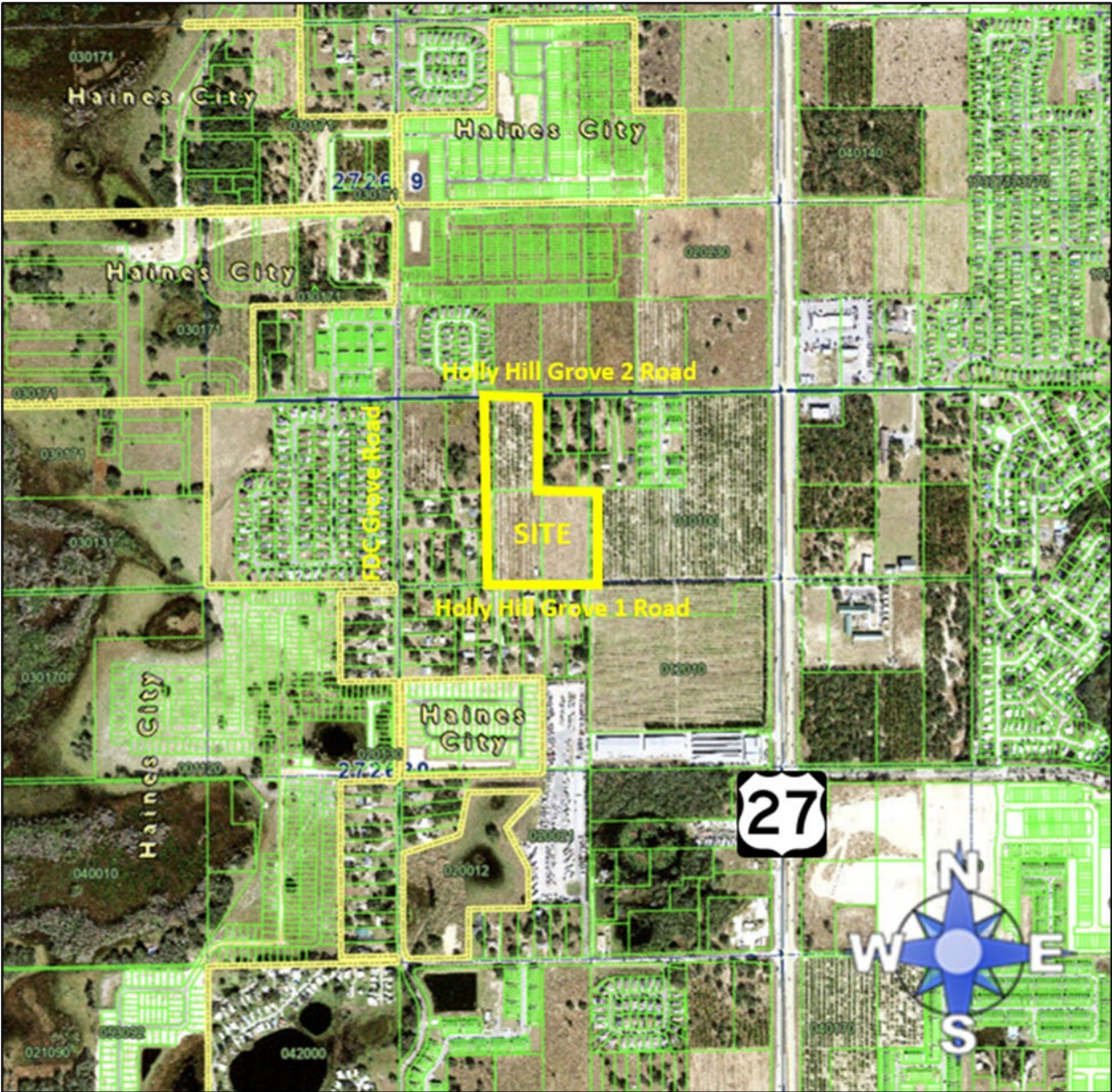
- Exhibit – 1 Location Map (Context)
- Exhibit – 2 Location Map (Detailed)
- Exhibit – 3 2023 Aerial Photo (Context)
- Exhibit – 4 2023 Aerial Photo (Detailed)
- Exhibit – 5 Current Future Land Use Map
- Exhibit – 6 Proposed Future Land Use Map
- Exhibit – 7 Letter from Polk County Public Schools
- Exhibit – 8 List of Permitted and Conditional Use in the Residential-High – X (RHX) District



Location Map (Context)



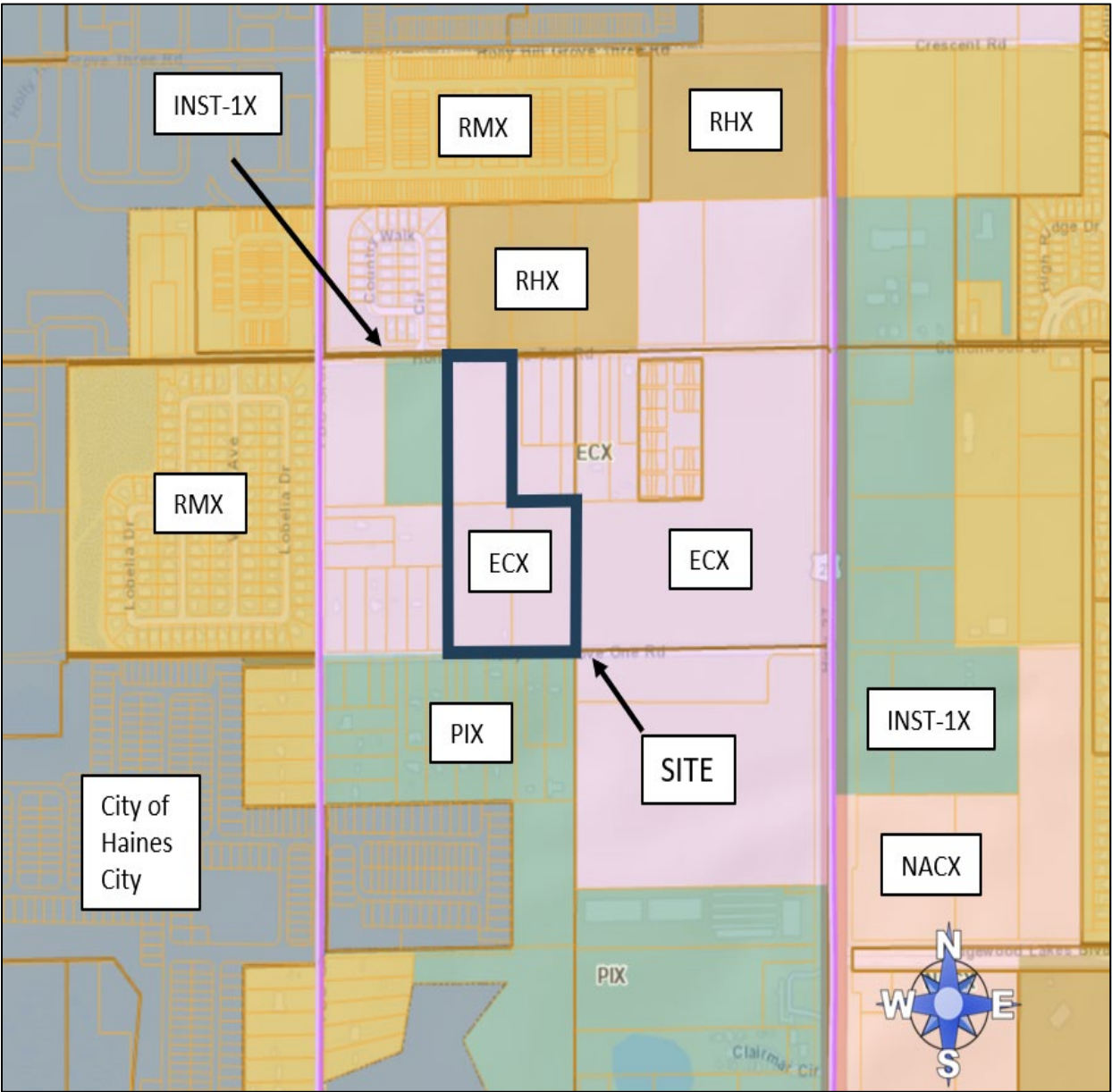
Location Map (Detailed)



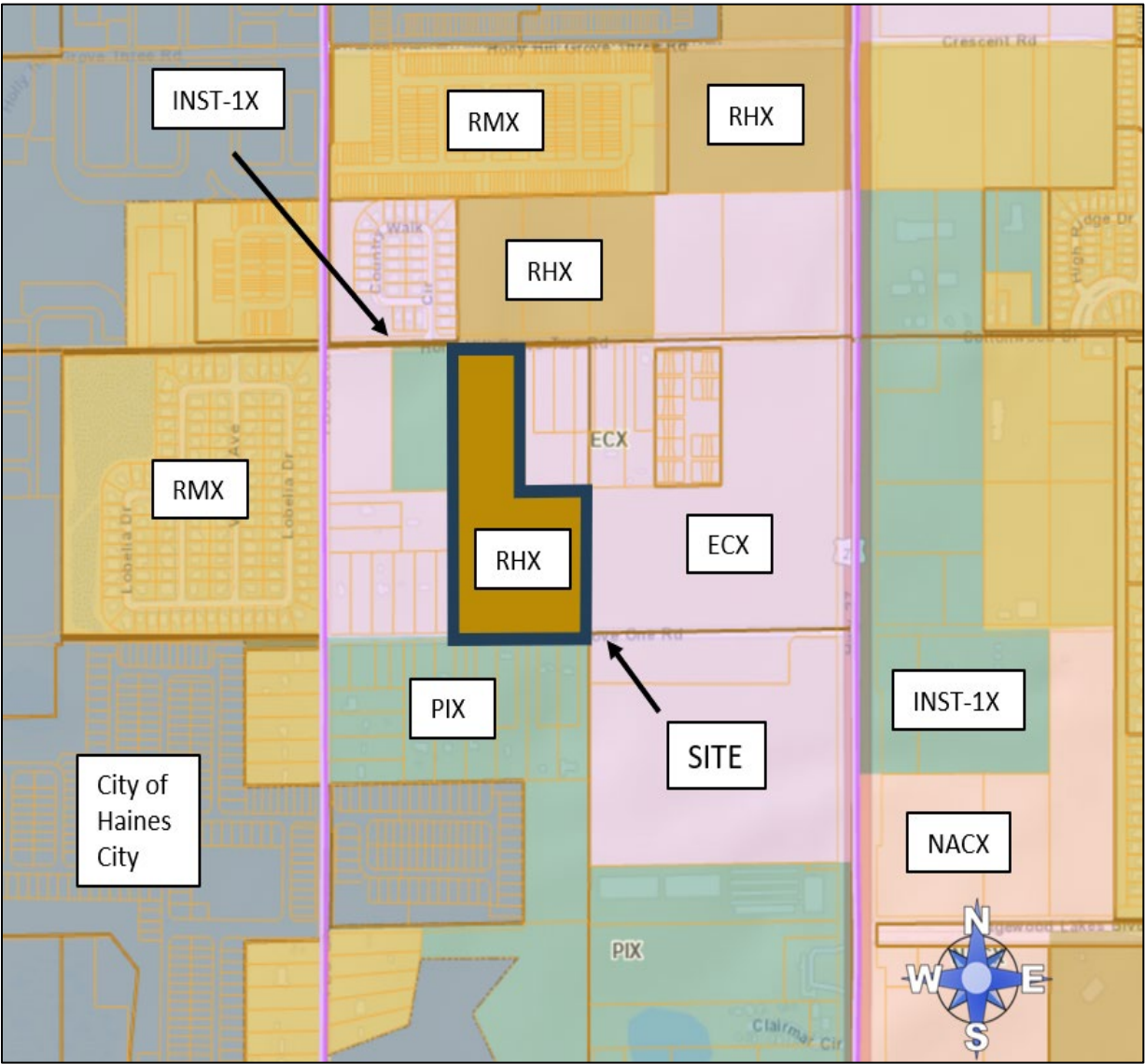
2023 Aerial Photo (Context)



2023 Aerial Photo (Detailed)



Current Future Land Use Map



Proposed Future Land Use Map


**POLK COUNTY
PUBLIC SCHOOLS**
BOARD MEMBERS

Dr. William Allen
Board Chair
District 1

Justin Sharpless
Board Vice-Chair
District 6

Travis L. Keyes
District 2

Rick Nolte
District 3

Sara Beth Wyatt
District 4

Kay Fields
District 5

Lisa Miller
District 7

ADMINISTRATION

Frederick R. Heid
Superintendent

April 25, 2025

PCSB: NB2025-042502

Daly Design Group
Attn: William Maki
913 N Pennsylvania Ave
Winter Park, FL 32789
(407) 740-7373
Email: BMaki@dalydesign.com

Dear William Maki:

This letter is in response to your request for a **non-binding school concurrency determination** for the proposed GPK HHG2 project located on parcel numbers 272630-708000-010030, 272630-708000-010130, and 272630-708000-010140. Currently, there is **insufficient capacity at the zoned elementary and adjacent zoned schools**. There is available capacity at the zoned middle school. There is insufficient capacity at the zoned high school; however, there is adequate capacity in the adjacent zoned school. If this application were seeking Binding Concurrency, this letter would serve as a finding of **inadequate capacity** to serve the proposed development. This development would need to either wait for capacity to become available or enter into a mitigation agreement. Please see the table below for concurrency analysis. Please see the table below for concurrency analysis.

Elementary School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Bella Citta (Zoned)	980	1,053	246	292 MF	36	No (-173)
Citrus Ridge (Adjacent)	517	624	297	292 MF	36	No (-190)
Horizons (Adjacent)	1,540	1,594	150	292 MF	36	No (-96)
Loughman Oaks (Adjacent)	1,179	1,420	422	292 MF	36	No (-181)

Middle School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Bella Citta (Zoned)	447	770	160	292 MF	18	Yes (+133)
Citrus Ridge (Adjacent)	582	981	200	292 MF	18	Yes (+199)

STUDENTS FIRST



1915 S. Floral Ave.
Bartow, FL 33830



P.O. Box 391
Bartow, FL 33831



863-534-0500



polkschoolsfl.com

Letter from Polk County Public Schools

(Page 1)

High School	Current Enrollment	Concurrency Capacity	Reserved Capacity	Housing Units	Students Generated by Project	Capacity Available
Ridge Community (Zoned)	2,626	2,848	378	292 MF	22	No (-156)
Auburndale (Adjacent)	1,787	2,404	561	292 MF	22	Yes (+56)

The School Board of Polk County has encumbered the available capacity **pending** the certificate of concurrency from Polk County Land Development.

Prior to Polk County Land Development's issuance of a final development order (**approved Level 2**), the seats will be reserved for a period of 18 months in accordance with Section 4.E.2 (a & d) below of the adopted Interlocal Agreement for Public School Facilities Planning.

Once the final development order has been issued by the city, the development must have proceeded to the horizontal construction phase prior to the end of the eighteen (18) month period for reserved capacities and the agreement to remain valid. At a minimum, this construction shall include rough lot grading consistent with an approved Water Management District Stormwater Permit. The construction phase shall exclude model homes.

4.E.2d. If the development does not proceed to construction with the specified period and school concurrency lapses, then the applicant may request the affected local government to issue a renewed certificate of school concurrency. As part of this request, the applicant must confirm that relevant project information remains the same as previously submitted or provide updated project details. The local government will renew the certificate of school concurrency if the School Board determines that there continues to be adequate school capacity to serve the proposed development subject to the provisions of 4.E.1.

After the eighteen (18) month period, if the governing municipality withdraws, terminates, or suspends the concurrency, then the applicant must reapply for school capacity determination. Please call the facilities planning and real estate department at 863-534-0620 ext. 581 or email at planning@polk-fl.net if you need any further assistance.

Sincerely,



Malissa Celestine | Senior Coordinator Facilities Planning
Facilities Planning & Real Estate Department | Polk County Public Schools
1909 South Floral Avenue, Bartow, FL 33830
T: (863)-534-0620 x 313 / Malissa.Celestine@polk-fl.net

c: Ben Dunn, Director of Planning & Development- Polk County BoCC benjamindunn@polk-county.net
Benjamin Ziskal, Director of Land Development - Polk County BoCC benjaminziskal@polk-county.net
Erik Peterson, Planning Administrator- Polk County BoCC erikpeterson@polk-county.net
Rita Karacson, Development Coordination Supervisor- Polk County BoCC ritakaracson@polk-county.net

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Letter from Polk County Public Schools

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	Technical Staff Review – Level 1 & 2	Public Hearing (s) Required – Level 3 & 4
Mixed Uses		Planned Development, C3; Residentially-Based Mixed-Use Development, C3; Transitional Area Development, C3
All Other Uses	Duplex, Two-Family Attached, P; Group Home, Small (6 or less residents), C1; Group Home, Large (7-14 residents), C1; Group Living Facility (15 or more residents), C2; Mobile Homes, Individual, C1; Multifamily, C2; Residential Infill Development, C2; Adult Day Care Center (7 or more clients), C2; Emergency Shelter, Small (6 or less residents), C1; Emergency Shelter, Medium (7-14 residents), C1; Emergency Shelter, Large (15 or more residents), C2; Golf Course, C1; Nursing Home, C2; Recreation, Passive, C1; Recreation, Low Intensity, C2; Recreation, High Intensity, C3; Religious Institution, C2; School, Elementary, C2; School, Middle, C2; School, High, C2; Utilities Class I, P; Utilities Class II, C1	Short Term Rental Unit, C3; Agricultural Support, On-site, C3; Agriculture Transfer, Packing, On-site, C3; Bed and Breakfast, C3; Childcare Center, C3; Communication Towers, Monopole, C3; Communication Towers, Guyed and Lattice, C3; Community Center, C3; Cultural Facility, C3; Governmental Facility, C3, Helistops, C3; Mining, Non-Phosphate, C4; Recreation, High Intensity, C3; School, Leisure/Special Interest, C3; School, University/College, C3; Utilities, Class III, C3

Residential-High – X Uses

(per Table 4.16 of the North Ridge SAP)