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**LEVEL 4
LAND DEVELOPMENT CODE
COMPREHENSIVE PLAN
AMENDMENT APPLICATION**

**Office of Planning and Development
Land Development Division**
330 W. Church St.
P.O. Box 9005, Drawer GM03
Bartow, FL 33831-9005
Phone (863)534-6792
FAX (863) 534-6407

TYPE OF AMENDMENT

Land Development Code ☐ Text ☐ Sub-district

Comprehensive Plan ☐ Text ☒ Large Scale Map ☐ Small Scale Map

Is property in a Selected Area Plan (SAP) ☒ Yes ☐ No

SAP Name NORTH RIDGE SAP

Pre Application Project # LDDR2025-23 **(Required)**

	Owner	Applicant	Contact Person
Name	OAK BEND INVESTMENTS & LYNNWAY ARMSTRONG LLC	DALY DESIGN GROUP	BILL MAKI
Work Number	321-209-6888	407-740-7373	407-740-7373
Fax Number	NA	NA	NA
Mailing Address	8615 COMMODITY CIR, STE 17, ORLANDO FL 32819	913 N PENNSYLVANIA AVE, WINTER PARK FL. 32789	913 N PENNSYLVANIA AVE, WINTER PARK FL. 32789
Email	TS@GPKHOLDINGS.COM	BMAKI @DALYDESIGN.COM	BMAKI @DALYDESIGN.COM

If additional contacts, please list on a separate sheet and submit with application.

Brief Description Request *(No more than 250 characters):*

REQUEST TO AMEND THE EXISTING FLU FROM ECX TO RHX FOR MULTI-FAMILY RESIDENTIAL

Request From: ECX Land Use/Sub-District
To: RHX Land Use/Sub-District
Acreage: 14.61

	Range - Township - Section	Subdivision #	-	Parcel #
Parcel ID Number(s):	<u>R 27 T 26 S 30</u>	<u>708000</u>	<u>-</u>	<u>010030</u>
	<i>(Include others on a separate attachment)</i>			
	<u>R 27 T 26 S 30</u>	<u>708000</u>	<u>-</u>	<u>010130</u>
	<u>R 27 T 26 S 30</u>	<u>708000</u>	<u>-</u>	<u>010140</u>
	<u>R T S</u>		<u>-</u>	

Address and Location of Property:

HOLLY HILL GROVE ROAD 2, DAVENPORT FL. 33837

Water Provider Name and Phone Number: POLK COUNTY UTILITIES

Sewer Provider Name and Phone Number: POLK COUNTY UTILITIES

(☒) Yes (☐) No Is the property located in the Green Swamp Area of Critical State Concern? *(If yes, a Green Swamp Impact Assessment Statement must be submitted with this application.)*

Identify existing uses and structures on subject and surrounding properties (e.g. vacant, residential # du/ac, commercial approx. square feet, etc.):

SINGLE FAMILY RESIDENTIAL / COUNTRY WALK ESTATES	VACANT / NO STRUCTURES	VACANT / NO STRUCTURES
NW	N	NE
SINGLE FAMILY RESIDENTIAL	VACANT / POLE BARN	VACANT / NO STRUCTURES
W	Subject Property	E
SINGLE FAMILY RESIDENTIAL	SINGLE FAMILY RESIDENTIAL	VACANT / NO STRUCTURES
SW	S	SE

Approval of this application does not waive any other applicable provisions of the Polk County Land Development Code, the Polk County Comprehensive Plan, the Polk County Utility Code which are not part of the request for this application, nor does approval waive any applicable Florida Statutes, Florida Building Code, Florida Fire Prevention Code, or any other applicable laws, rules, or ordinances, whether federal, state or local. The applicant has the obligation and responsibility to be informed of and be in compliance with all applicable laws, rules, codes and ordinances.

I, WILLIAM MAKI (print name), the owner of the property which is the subject of this application, or the authorized representative of owner of the property which is the subject of this application, hereby authorize representatives of Polk County to enter onto the property which is the subject of this application to perform any inspections or site visits necessary for reviewing this application. I understand that representatives of Polk County are not authorized to enter any structures dwellings which may be on the property.

Digitally

signed by

William G Maki

Date: _____

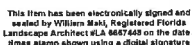
2025.05.08ner's authorized representative.

10:33:00

-04'00'

05.08.2025

Date:



Printed copies of this document are not considered signed and sealed and the signature must be verified on any / all electronic copies.

GPK
HOLLY HILL GROVES 2
COMPREHENSIVE PLAN
AMENDMENT

PREPARED
MARCH 2025
REVISED
MAY 2025

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GPk HHG2 Comprehensive Plan Amendment Justification Report

Property Identification Numbers		Property Owners
Parcel Number	Alternate Key	
27-26-30-708000-010030	10030	Oak Bend Investment LLC 8615 Commodity Cir Ste 17 Orlando, FL 32819
27-26-30-708000-010130	10130	Oak Bend Investment LLC 8615 Commodity Cir Ste 17 Orlando, FL 32819
27-26-30-708000-010140	10140	Lynnway Armstrong LLC 8018 King Palm Cir Kissimmee, FL 34747

Consultant Team:

Applicant / Urban Planner:

Daly Design Group
913 N Pennsylvania Ave
Winter Park, FL 32789
Contact: Mr. William Maki
Email: bmaki@dalydesign.com

Traffic Engineer:

Raysor Transportation Consulting
19046 Bruce B. Downs Blvd, Suite 308
Tampa, FL 33647
Contact: Mr. Michael D. Raysor
Email: mdr@raysor-transportation.com

Environmental Consultant:

Bio-Tech Consulting Inc
3025 East South Street
Orlando, FL 32803
Contact: Mr. Steve Butler
Email: steve@bio-techconsulting.com

Surveyor:

Johnston's Surveying LLC
900 Cross Prairie Parkway
Kissimmee, FL 34744
Contact: Mr. Richard Brown
Email: rick@jsurveying.com

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- A. School Board of Polk County Capacity Determination
- B. Conceptual Land Use Plan – Daly Design Group
- C. Traffic Impact Assessment – Raysor Transportation Consulting

1.1 Project Location:

The subject site is approximately 14.61 acres and is adjacent to the south right of way line of Holly Hill Grove Rd 2 and west of US HWY 27 (Exhibit 1).

Primary access to the project shall be provided via Holly Hill Grove Rd 2.

1.2 Legal Description:

TRACT 3 IN THE NE 1/4 OF SECTION 30, TOWNSHIP 26 SOUTH, RANGE 27 EAST, POLK COUNTY, FLORIDA, ACCORDING TO THE PLAT OF FLORIDA DEVELOPMENT CO. TRACT RECORDED IN PLAT BOOK 3, PAGE 60, PUBLIC RECORDS OF POLK COUNTY, FLORIDA.

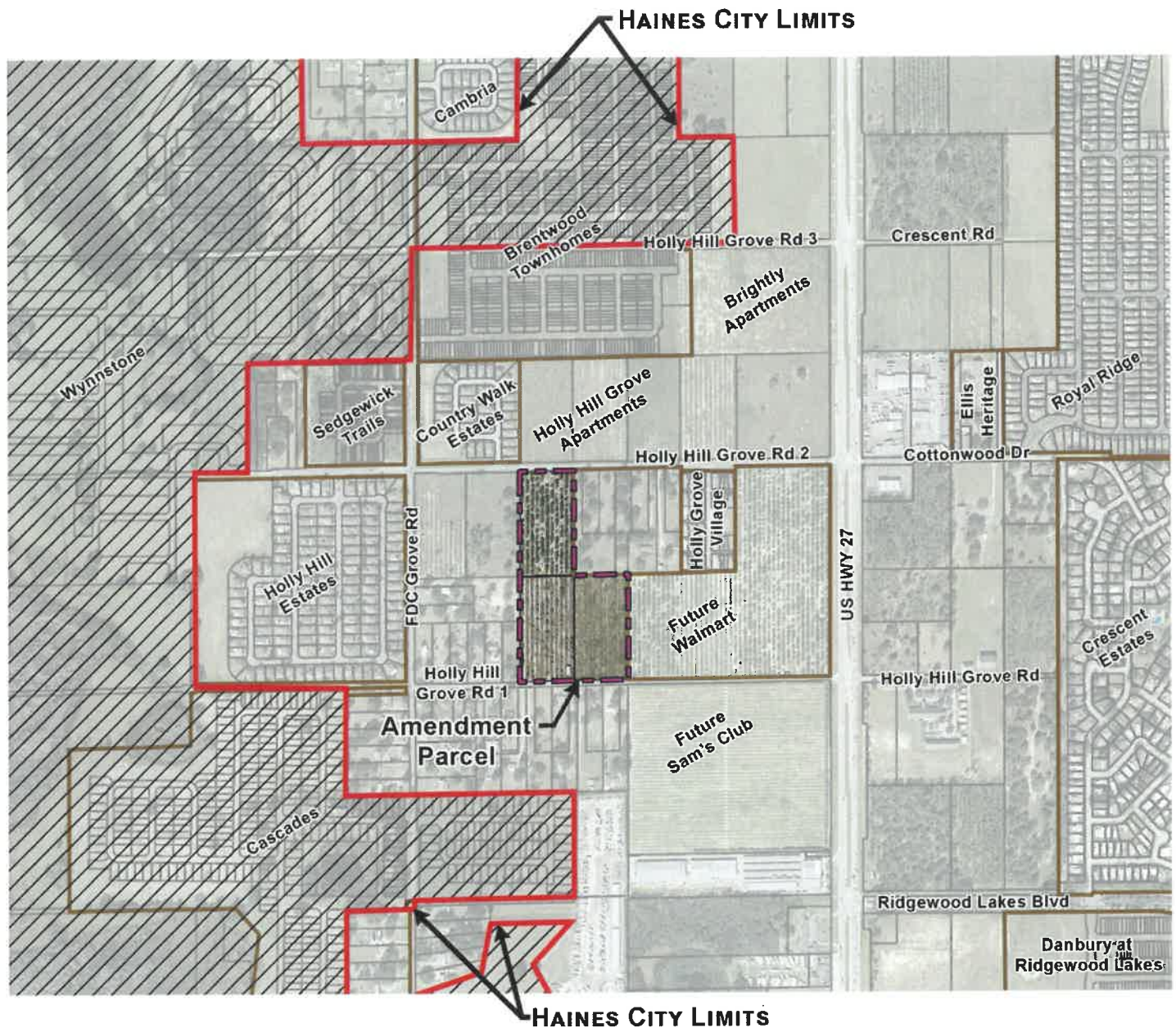
LESS FOR ROAD RIGHT OF WAY.

TOGETHER WITH

TRACT 13 IN THE NE 1/4 OF SECTION 30, TOWNSHIP 26 SOUTH, RANGE 27 EAST, OF FLORIDA DEVELOPMENT SUBDIVISION, AS SHOWN BY MAP OR PLAT THEREOF RECORDED IN THE OFFICE OF THE CLERK OF THE CIRCUIT COURT IN AND FOR POLK COUNTY, FLORIDA, IN PLAT BOOK 3, PAGES 60 THROUGH 63 INCLUSIVE.

TOGETHER WITH

TRACT 14, IN THE NORTHEAST 1/4 OF SECTION 30, TOWNSHIP 26 SOUTH, RANGE 27 EAST, FLORIDA DEVELOPMENT CO. TRACT, ACCORDING TO THE MAP OR PLAT THEREOF, AS RECORDED IN PLAT BOOK 3, PAGE(S) 60 THROUGH 63, INCLUSIVE, OF THE PUBLIC RECORDS OF POLK COUNTY, FLORIDA.



GPK HHG2 **Polk County, Florida**

Exhibit 1 **Location Map**



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1.3 Amendment Parcels:

The subject site contains a total of three (3) parcels and has an existing Future Land Use (FLU) designation of Polk County Employment Center (ECX), which permits the development of activity centers to facilitate light assembly, office and research parks, low impact commercial and other businesses. (Alt Key 10030, 10130, 10140) (Exhibit 2). The applicant is requesting to amend the existing Future Land Use from Polk County Employment Center (ECX) to Polk County Residential High (RHX) (Exhibit 3).

1.4 Project Overview:

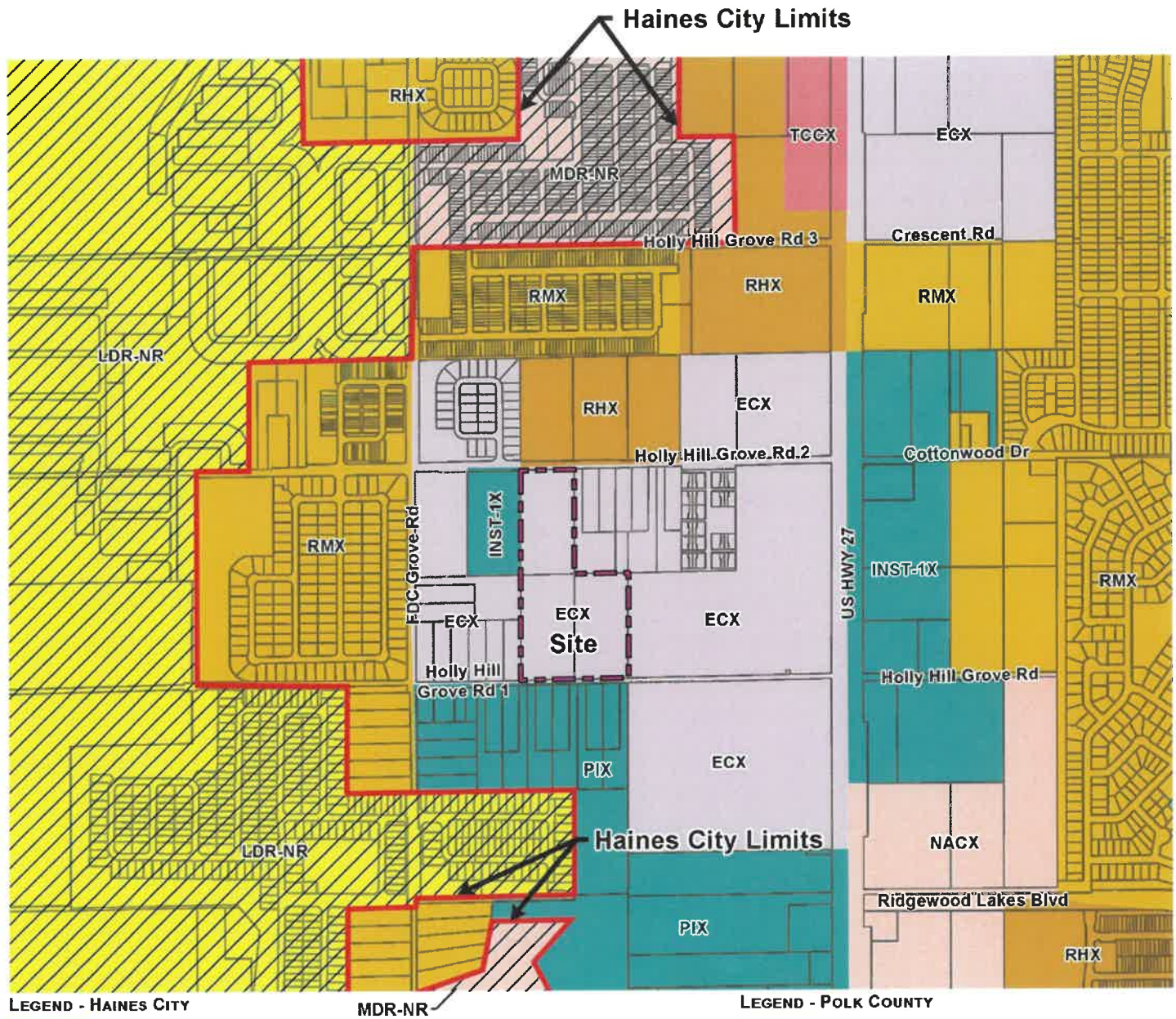
The overall site is comprised of three (3) tax parcels with a total acreage of approximately 14.61 acres. See Table 1.4.1. All three (3) parcels have an existing Future Land Use designation of Polk County Employment Center (ECX), and are within the Ridge Special Protection Area, North Ridge Selected Area Plan, Transit Supportive Development Area, and Green Swamp Protection Area.

The Applicant is requesting to amend the Future Land Use on the three (3) subject parcels from Employment Center (ECX) to Residential High (RHX) (Exhibit 3) in order to develop a maximum of (292) multi-family units (20 Du/Ac). The subject site's current Future Land Use designation of Employment Center (ECX) permits a maximum of 445,488 square feet (0.7 FAR) of commercial development. The Applicant's requested Future Land Use designation of Residential High (RHX) requires a minimum of 103 dwelling units (7 Du/Ac) to a maximum of 292 dwelling units (20 Du/Ac).

The proposed community will be developed consistent with Polk County Land Development Code (LDC). Stormwater retention will be provided on-site. The stormwater management system will be designed and constructed consistent with Polk County and Southwest Florida Water Management District (SWFWMD) standards. Recreation for the GPk HHG2 Community shall be provided in the form of community recreation areas that may include passive and active recreation opportunities. Open space tracts and buffers shall be provided consistent with the Polk County LDC.

Table 1.4.1

<u>Property #</u>	<u>Alternate Key</u>	<u>City / County</u>	<u>Existing Future Land Use</u>	<u>Requested Future Land Use</u>
Amendment Parcel				
27-26-30-708000-010030	010030	County	Employment Center (ECX)	Residential High (RHX)
27-26-30-708000-010130	010130	County	Employment Center (ECX)	Residential High (RHX)
27-26-30-708000-010140	010140	County	Employment Center (ECX)	Residential High (RHX)



GPK HHG2 Polk County, Florida

Exhibit 2 Existing FLU



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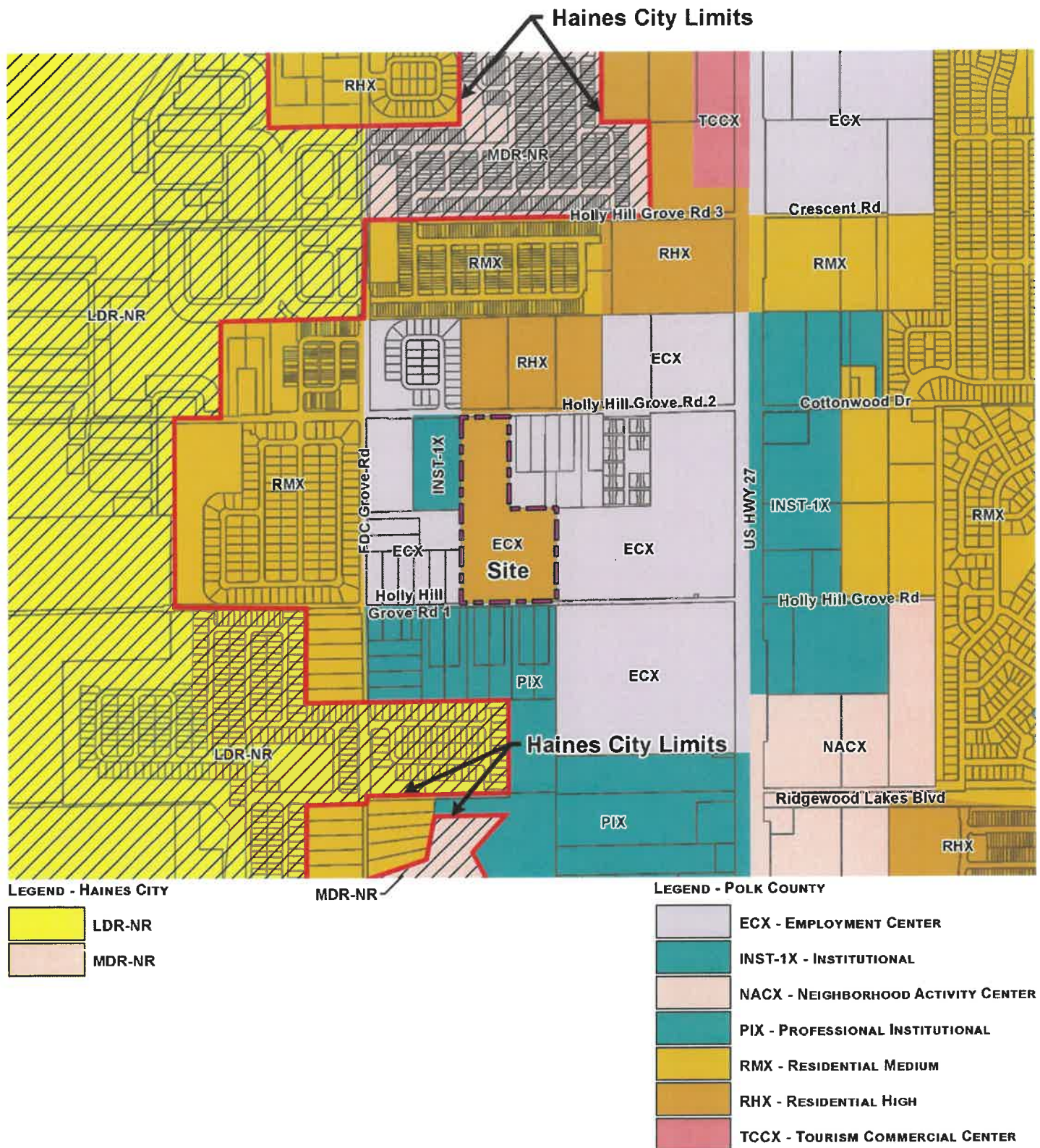
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Exhibit 3 Proposed FLU



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1.5 Existing Conditions:

Topography:

The Amendment Parcel has approximately 16' of topographic relief across the site that ranges from elevation 174' to elevation 190'. The high point is located within the central portion of the site. This high point is a ridge which splits the topography and generally runs north towards Holly Hill Grove Rd 2, which has an elevation of 179,' and south towards Holly Hill Grove Rd 1, which has an elevation of 174' (Exhibit 4).

Soils:

The subject site consists of Candler Sands (0-5% slopes) (Exhibit 5).

FEMA:

Per FEMA Map Panel 12105C0225G, there are no flood plains present on the subject site (Exhibit 6).

1.6 Adjacent Uses:

The community northwest of the Amendment Parcel is Country Walk Estates (PB 155, PGs 37 and 38). Country Walk Estates has an existing Future Land Use designation of Employment Center (ECX) (Exhibit 7). This community is comprised of (34) single-family homes and was originally platted in July 2014. See Table 1.6.1.

The parcels north of the Amendment Parcel consist of (3) vacant parcels which are part of the Florida Development Co Subdivision (PB 3, PGs 60-63) and have an existing Future Land Use designation of Residential High (RHX) (Exhibit 7). These parcels have been approved for the development of (288) multi-family dwelling units as part of the Holly Hill Grove Apartments community. See Table 1.6.1.

The parcel west of the Amendment Parcel consists of a single-family home and (2) vacant parcels which are part of the Florida Development Co Subdivision (PB 3, PGs 60-63). Two (2) parcels have an existing Future Land Use designation of Employment Center (ECX) and one (1) parcel has an existing Future Land Use designation of INST-1X which permits the development of public and private education facilities, government-administration buildings, public-safety structures, cultural facilities, or health-care facilities (Exhibit 7).

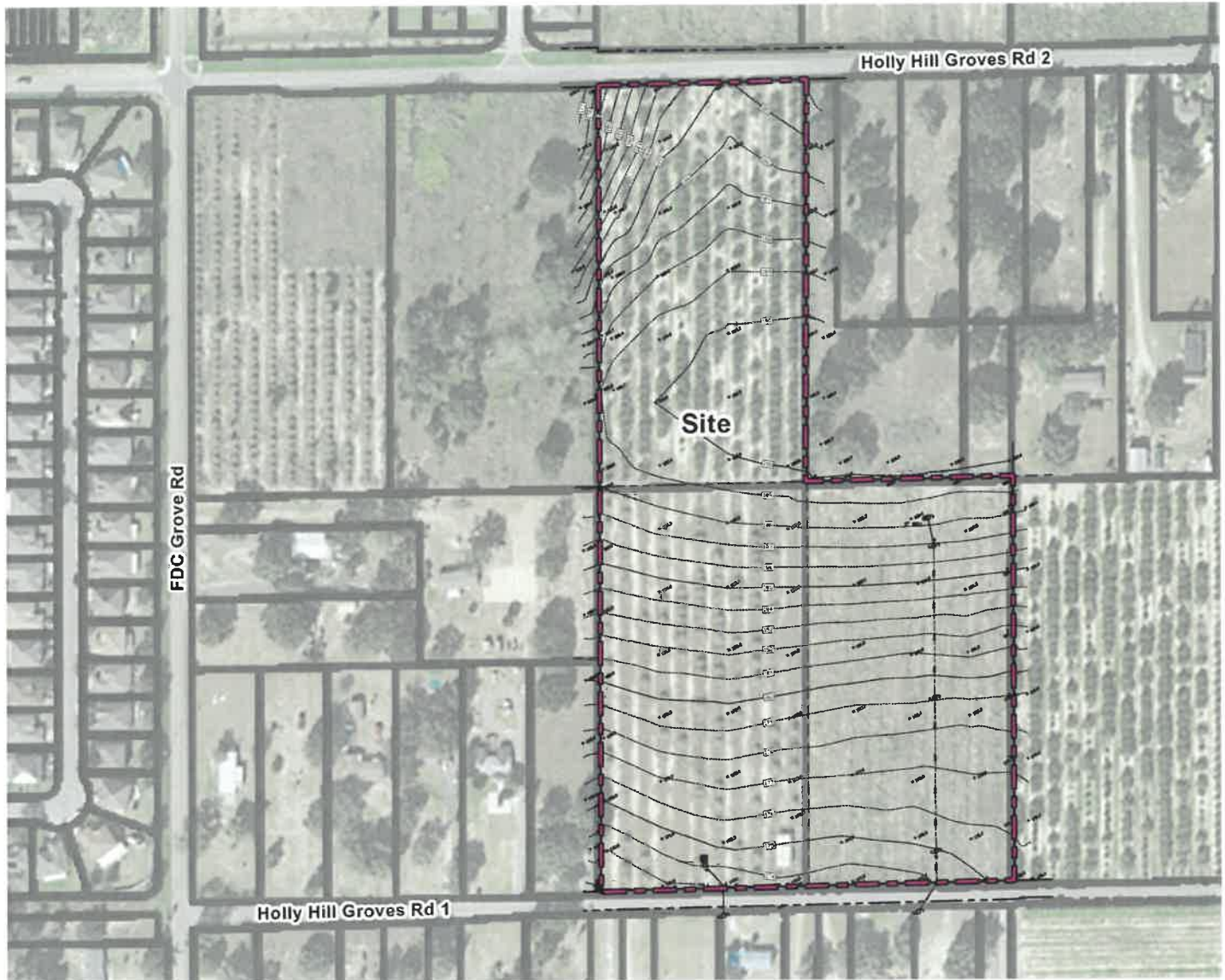
The parcels south of the Amendment Parcel consist of (9) single-family homes which are part of the Florida Development Co Subdivision (PB 3, PGs 60-63) and have an existing Future Land Use designation of Professional Institutional (PIX) which permits the development of medical facilities, retail, and commercial uses (Exhibit 7).

The parcels west of FDC Grove Rd are the Holly Hill Estates (PB 123, PGs 27-29). Holly Hill Estates has an existing Future Land Use designation of Residential Medium (RMX) (Exhibit 7). The Holly Hill Estates community is comprised of (134) single-family homes and was originally platted in November 2003. See Table 1.6.1.

The parcel to the east of the Amendment Parcel has been recently approved for the amendment of the Future Land Use from Professional Institutional (PIX) to Employment Center (ECX). Walmart and Sam's Club have recently been approved for commercial development with a maximum floor area of 390,000 square feet and (4) outparcels with a maximum floor area of 67,500 square feet on 57.61 acres. See Table 1.6.1.

Table 1.6.1

Surrounding Developments				
Subdivision Name	Relation to Subject Site	Approved Density / Intensity	Plat Book & Page	Date Approved
Holly Hill Grove Apartments	North	288 Multi-Family Units	N/A	Sep-2024
Brentwood Townhomes	North	770 Multi-Family Lots	PB 194, PGs 16-19	Sep-2022
			PB 207, PGs 50-53	Aug-2024
			PB 209, PGs 1-4	Sep-2024
Cascades	South	1,068 Single-Family Lots	PB 193, PGs 37-52	Aug-2022
			PB 196, PGs 23-24	Dec-2022
			PB 208, PGs 9-20	Aug-2024
Country Walk Estates	North	34 Single-Family Lots	PB 182, PGs 2-3	Jan-2021
Holly Grove Village	East	40 Multi-Family Lots	PB 165, 22-24	Oct-2017
Walmart and Sam's Club	East	457,500 Sq Ft of Commercial	N/A	Sep-2024
Holly Hill Estates	West	237 Single-Family Lots	PB 123, PGs 27-29	Nov-2003
Sedgewick Trails	Northwest	76 Single-Family Lots	PB 182, PGs 2-3	Jan-2021
Wynnstone	West	1,984 Single-Family Lots	PB 213, PGs 16-33	Feb-2025



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Polk County, Florida

Exhibit 4
Topographic Map



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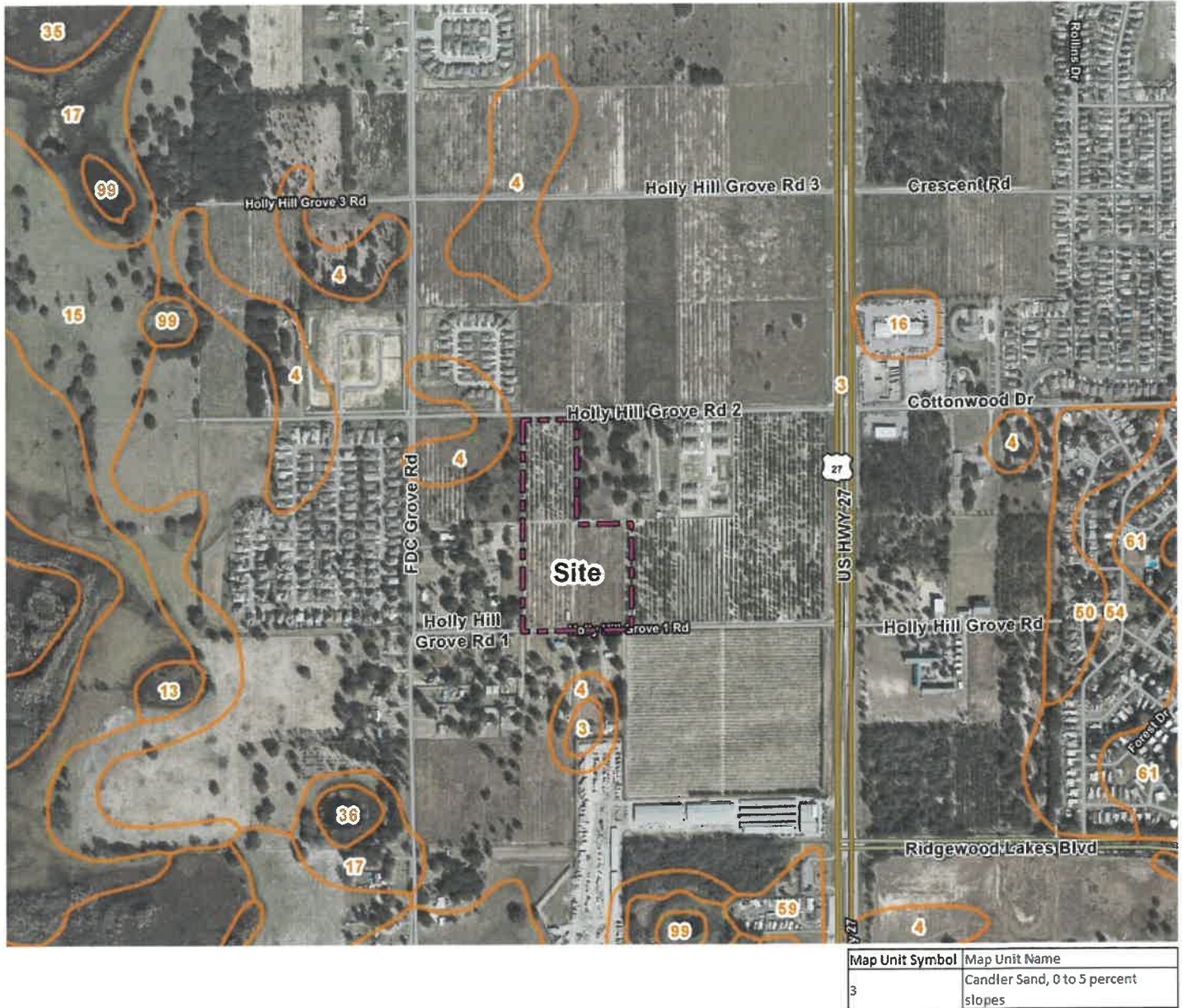
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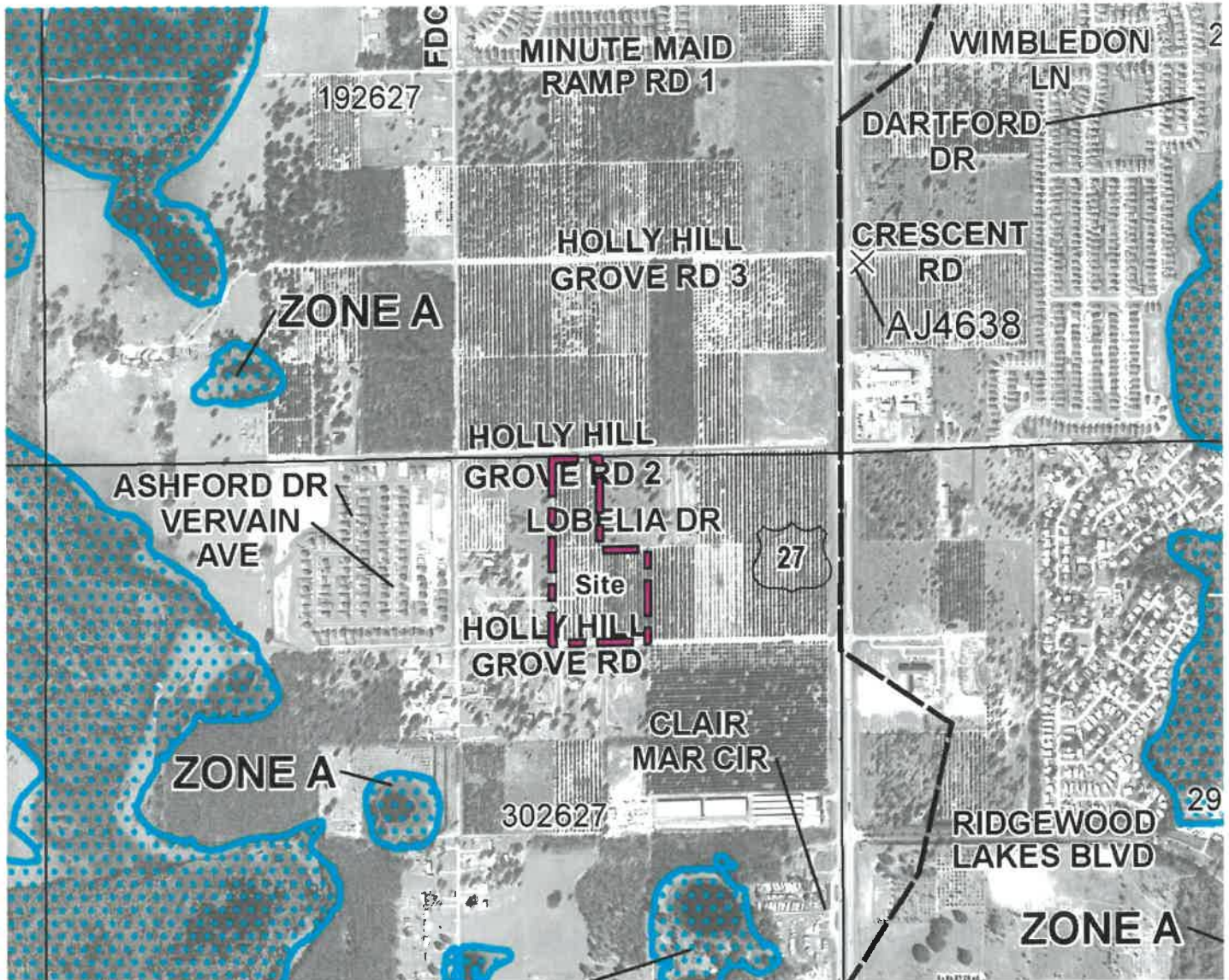
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Exhibit 5 Soils Map





FEMA Flood Panel: 12105C0225G

GPK HHG2

Polk County, Florida

Exhibit 6

FEMA Map



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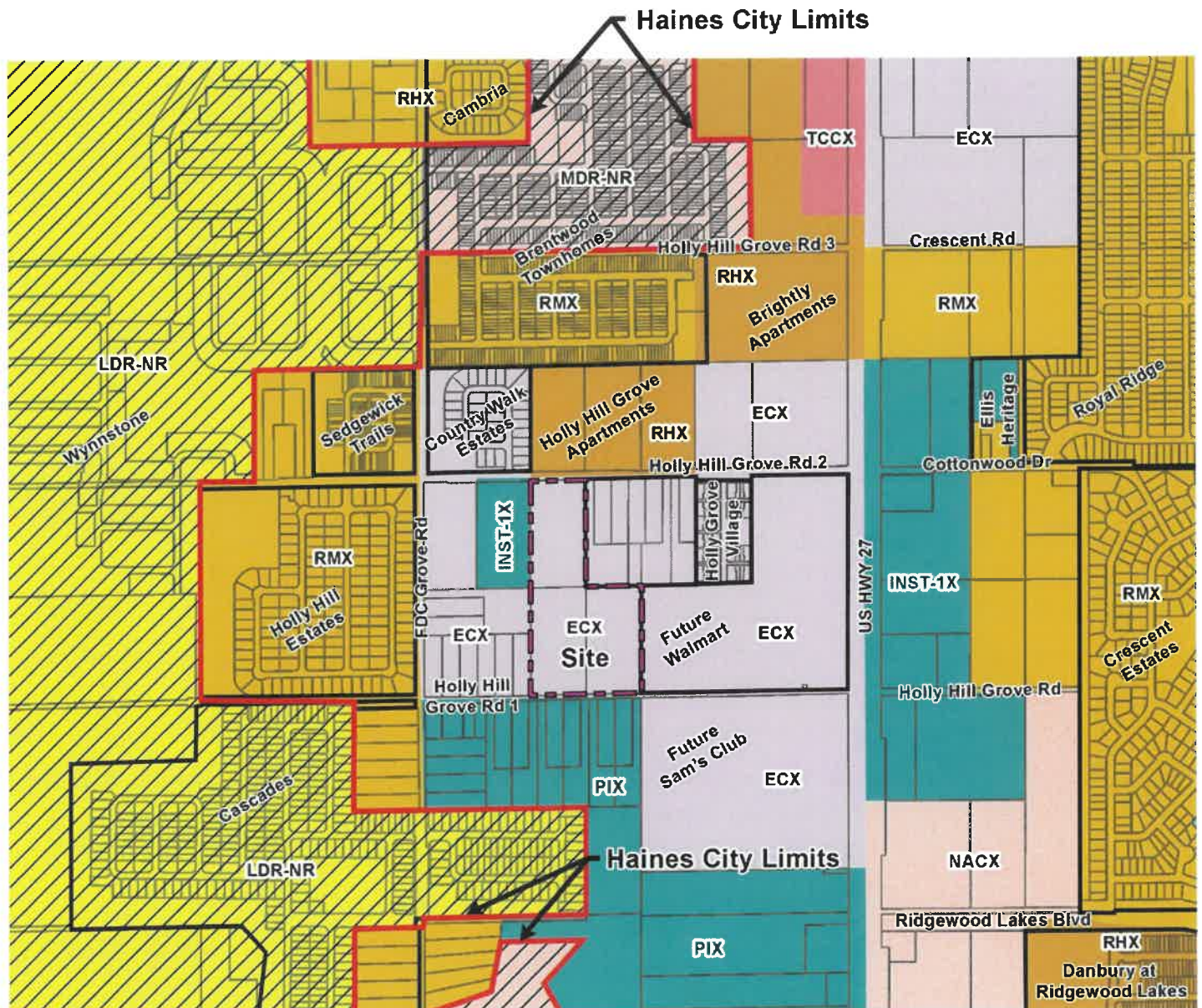
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Exhibit 7 Surrounding FLU



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1.7 Consistency with the 2045 Comprehensive Plan:

Pursuant to Polk County Land Development Code, the County shall be guided by the following review criteria when rendering a decision on an application for Level IV (4) Review.

Future Land Use Element:

Objective 2.102 – Growth Management

Policy 2.102-A10: Location Criteria

- a. Nearness to incompatible land uses and future land uses, unless adequate buffering is provided

Response:

The subject site is within the North Ridge Selected Area Plan (SAP) and Ridge Special Protection Area (SPA). The development criteria of these areas promotes the development of residential uses in close proximity to commercial development. The proposed amendment will permit the development of high density residential adjacent to the proposed commercial center to the east of the subject site in accordance with the fundamental principles of the SAP.

The parcels adjacent to and in the vicinity of the subject site have land uses which support the development of high density residential. As stated in Section 1.6, the parcels to the east of the subject site consist of Employment Center (ECX). The parcels to the north consist of Residential High (RHX). The parcels to the west consist of Employment Center (ECX) and Institutional (INST-1X). The parcels to the south consist of Professional Institutional (PIX) (Exhibit 7). Amending the Future Land Use designation of the subject site from ECX to RHX will provide for a transition of development intensity from US HWY 27 to the low density residential within Haines City limits (Exhibit 3).

- b. Nearness to agriculture-production areas

Response:

The subject site is within the Transit Supportive Development Area (TSDA) and the North Ridge Selected Area Plan. These areas were established to support high density and intensity development. The primary existing land use surrounding the subject site, as established by the SAP, is Employment Center (ECX), Residential Medium (RMX), Residential High (RHX), Institutional (INST-1X), and Professional Institutional (PIX) (Exhibit 2). These land uses do not allow agricultural uses.

- c. Distance from populated areas

Response:

The Amendment Parcel is within close proximity to multiple Medium and High-Density Residential developments as well as a large commercial development to the east. See Table 1.6.1 and Exhibit 7.

- d. Economic issues, such as minimum population support and market area radius (where applicable)

Response:

The subject parcel is located within the North Ridge Selected Area Plan which was established in anticipation of high density and intensity development. The estimated population as per the *BEBR Households and Average Household Size in Florida* is 763 people (2.61 per household).

- e. Adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development

Response:

Potable Water and Reclaimed Water are adjacent to the subject site. The Force Main is along FDC Grove Rd and will be extended to serve the subject site. An estimated level of service for public utilities has been provided. See Section 1.8. Stormwater retention will be provided on site and will be designed in accordance with Polk County's Land Development Code and Southwest Florida Water Management District.

A non-binding school capacity determination letter was submitted to Polk County Public Schools; a copy of the determination letter is attached. See Appendix A and see Table 1.7.1 for School Proximity. Emergency services are within close proximity to the subject site. See Table 1.7.2. Community open space will be provided on site in accordance with the Polk County Land Development Code.

- f. Environmental factors

Response:

The subject site has no wetlands or flood plains present on site. See Section 1.5. An Environmental Assessment shall be submitted under a separate cover.

Table 1.7.1

School Name	Distance from Subject Site
Bella Cita Elementary School	6.0 +/- miles
Citrus Ridge K-8 Middle School	8.9 +/- miles
Ridge Community Senior High School	4.8 +/- miles

Table 1.7.2

Service	Distance from Subject Site
Sheriff – 1100 Dunson Road, Davenport	3.9 +/- miles
Fire / EMS – 126 Cottonwood Dr, Davenport	0.6 +/- miles
Hospital - 40100 US HWY 27, Haines City, FL	1.8 +/- miles

Policy 2.102-A11: Urban Sprawl Criteria

Polk County will discourage the proliferation of urban sprawl by use of the following criteria when determining the appropriateness of establishing or expanding any land use or development area.

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

Response:

The proposed amendment will permit the Applicant to develop high density multi-family housing (20 Du/Ac) within close proximity to US HWY 27 and within the rapidly urbanizing North Ridge Selected Area Plan. Recently approved projects such as the adjacent Walmart and Sam's Club commercial development shall provide employment and support services in close proximity to the residents of the proposed community.

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

Response:

The subject site is within the North Ridge Selected Area Plan which promotes urban style development. The existing future land use for the property is Employment Center (ECX), consistent with urban uses. The proposed amendment will not promote urban development within rural areas. The development of the subject site will promote a transition of use and intensity of the recently approved 57.61-acre Walmart and Sam's Club commercial development, which is direct adjacent to the subject site.

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

Response:

The proposed residential development is within the rapidly urbanizing Transit Supportive Development Area (TSDA) and North Ridge Selected Area Plan. Multiple surrounding properties have been developed, recently approved, or in process of being approved. See Section 1.6. The surrounding developments are generally clustered around Hwy 27, consistent with the TSDA. The amendment of the subject site will not create radial, strip isolated, or ribbon pattern development.

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

Response:

The subject site is within the North Ridge Selected Area Plan which promotes urban style development. The existing future land use for the property is Employment Center (ECX), consistent with urban uses. The proposed amendment will not promote urban development within rural areas. The development of the subject site will promote a transition of use and intensity of the recently approved 57.61-acre Walmart and Sam's Club commercial development, which is direct adjacent to the subject site. There are no flood plains or wetlands present on the subject site (Exhibit 6). An Environmental Assessment will be submitted under a separate cover.

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

Response:

The subject site is within the Transit Supportive Development Area (TSDA) and the North Ridge Selected Area Plan. These areas were established to support high density and intensity development. The primary existing land use surrounding the subject site, as established by the SAP, is Employment Center (ECX), Residential Medium (RMX), Residential High (RHX), Institutional (INST-1X), and Professional Institutional (PIX) (Exhibit 7). These land uses do not allow agricultural uses.

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

Response:

Potable Water and Reclaimed Water are adjacent to the subject site; capacity exists to serve the project. The Force Main is along FDC Grove Rd and will be extended to serve the subject site. An estimated level of service for public utilities has been provided. See Section 1.8. Stormwater retention will be provided on site and will be designed in accordance with Polk County's Land Development Code and Southwest Florida Water Management District.

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

Response:

No new public facilities or services will need to be provided for the project as existing facilities and services are proposed to serve the site. The Applicant will coordinate with PCU to verify sufficient capacity to serve the site is available.

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

Response:

Access to the subject site will be provided via Holly Hill Grove Rd 2 which intersects Hwy 27 to the east. Emergency access will be provided via Holly Hill Grove Rd 1. A Traffic Impact Assessment has been provided for review. See Appendix C.

Potable Water and Reclaimed Water are adjacent to the subject site; capacity exists to serve the project. The Force Main is along FDC Grove Rd and will be extended to serve the subject site. An estimated level of service for public utilities has been provided. See Section 1.8. Stormwater retention will be provided on site and will be designed in accordance with Polk County's Land Development Code and Southwest Florida Water Management District.

A non-binding school capacity determination letter was prepared by Polk County Public Schools and is attached for review. See Appendix A and Table 1.7.1 for School Proximity. Emergency services are within close proximity to the subject site. See Table 1.7.2 for proximity to emergency services.

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

Response:

The proposed residential development will provide a transitional use between the high intensity of the adjacent Walmart and Sam's Club to the residential developments west of the subject site.

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

Response:

The development of the subject site does not isolate any of the surrounding properties. The density of the proposed residential development will provide the development patterns and densities needed for the development of the adjacent ECX, INST-1X, and PIX parcels.

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

Response:

The requested land use of RHX works in conjunction with the adjacent ECX, INST-1X, and PIX to provide the necessary housing and population needed to support the uses in which ECX, INST-1X, and PIX allow.

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

Response:

The proposed residential development will have primary access via Holly Hill Grove Rd 2 which intersects Hwy 27 to the east, and emergency access via Holly Hill Grove Rd 1. This development will not impact the accessibility of the adjacent parcels and developments.

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

Response:

The existing conditions of the subject site does not allow for the functional use as public open space. A minimum of 40% of the subject site will be reserved for open space per Polk County's Land Development Code Ch 5, Sec 504.

Objective 2.104-A - The Polk County Plan shall provide areas for the development of urban-intensity growth through the designation and mapping of Transit Supportive Development Area, and the establishment of policies to govern the development of land within the Transit Supportive Development Area.

Policy 2.104-A5: Development Criteria

- a) Provide access to transit facilities
- b) Connect to centralized potable water and sanitary sewer systems
- c) Incorporate design features that promote healthy communities and green building practices, as established in Section 2.1251, Community Design, of this element
- d) Implement “Complete Street” and “Conservation Development” principles as established under Section 2.1251, Community Design, of this element
- e) Integrate pedestrian-oriented features, including sidewalks, trails or walkways into every development including appropriate pedestrian shelters or awnings
- f) Provide access to civic space, parks, green areas, and open space and other amenities
- g) Be supported by public safety (i.e., fire, EMS and law enforcement)
- h) Have access to public schools
- i) Provide connectivity with adjacent uses within the TSDA, and facilitate connectivity between the TSDA and other urban centers and the rural development areas
- j) Encourage the inclusion of a variety of housing choices, other than single family detached homes, townhomes, condominiums, and residential units in mixed use buildings by establishing minimum densities that preclude the exclusive use of single family detached units within designated areas as established in Policy 2.104-A7

Response:

The subject site will connect to existing public transit facilities and trail networks, and provide a minimum of 500 square feet of recreational space per dwelling unit with an overall minimum open space of 40% as per Ch 5, Sec 504 of the Polk County Land Development Code.

Potable Water and Reclaimed Water are adjacent to the subject site. The Force Main along FDC Grove Rd and will be extended to serve the subject site. An estimated level of service for public utilities has been provided. See Section 1.8. Stormwater retention will be provided on site and will be designed in accordance with Polk County's Land Development Code and Southwest Florida Water Management District.

Section 2.131-Q – North Ridge Selected Area Plan

Vision Basic Principles:

12. Mixing residential and non-residential uses along with interconnectivity between neighborhoods and commercial districts will support a more efficient transportation pattern in the area as well as help maintain the level of service on US 27.

Response:

The parcel to the east of the subject site has been recently approved for a Walmart and Sam's Club commercial development on 57.61 acres of Employment Center (ECX) with no proposed residential. The proposed amendment of the subject site will provide a residential component that will support the development on the adjacent parcel. The Amendment Parcel will provide primary access along Holly Hill Grove Rd 2 and a pedestrian and bicycle path the proposed Walmart and Sam's Club east of the subject site.

Policy 2.131-U1: Ten percent (10%) of open space (30% of the area within the Green Swamp) shall be required of all development, to ensure an aesthetic and visually pleasing sense of place.

Section 2.132-B: Ridge Special Protection Area

Policy 2.132-B10 (d): All residential development must provide a minimum open space set-aside of no less than 30% of total land area.

Response:

The subject site is within the Green Swamp Area of Critical State Concern and Ridge Special Protection Area and will provide a minimum of 40% open space per Polk County's Land Development Code Ch 5, Sec 504.

Section 2.131-Q – North Ridge Selected Area Plan

Objective 2.131-Q: North Ridge Selected Area Plan – Development within the North Ridge Selected Area Plan (SAP) shall occur in accordance with the policies stated within the section in addition to all other policies within the Future Land Use Element and other elements incorporated within the Polk County Comprehensive Plan not in conflict with these policies.

Section 2.132-B: Ridge Special Protection Area

Policy 2.132-B10: Development Criteria

b. Development of RH parcels shall be subject to the following restrictions:

2. 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.

Response:

The subject site is immediately adjacent to a recently approved Walmart and Sam's Club which permits the development of a maximum of 390,000 square feet of commercial development and 67,500 square feet of outparcel commercial development on 57.61 acres of Employment Center (ECX) with no proposed residential. The proposed amendment of the subject site will provide a residential component that will support the adjacent commercial uses.

In addition to the future Walmart and Sam's Club development, there are approximately 24.09 acres with a Future Land Use of Employment Center (ECX). It can be anticipated that these parcels will be developed consistent with the ECX Future Land Use designation and will provide additional commercial development consistent with the North Ridge Selected Area Plan.

1.8 Impact Assessment Statements:

Land and Neighborhood Characteristics

1. How and why is the site suitable for the proposed uses

Response:

The subject site is within the North Ridge Selected Area Plan which was established to support a mix of high density and intensity urban development. The neighboring Employment Center (ECX) parcels have been recently approved for the development of a Walmart and Sam's Club, providing high intensity commercial development. The proposed amendment will permit the construction of high density residential that will support the adjacent commercial uses and provides a transition of uses to the residential to the west, consistent with the SAP. See Table 1.8.1.

Table 1.8.1

Surrounding Land Uses				
Relation to Subject Site	Subdivision / Development Name	Future Land Use	Approved Density / Intensity	Du/Ac
North	Country Walk Estates	Employment Center (ECX)	34 Single-Family Lots	3.54
	Holly Hill Grove Apartments	Residential High (RHX)	288 Multi-Family Units	19.89
East	Florida Development Co Subdivision	Employment Center (ECX)	Vacant	0.00
	Walmart and Sam's Club		457,500 Square Feet Commercial	0.00
South	Florida Development Co Subdivision	Professional Institutional (PIX)	35 Single-Family Lots	0.99
West	Holly Hill Estates	Residential Medium (RMX)	237 Single-Family Lots	6.14
Center	Florida Development Co Subdivision	Institutional (INST-1X)	Vacant	0.00

Within the Haines City limits west of Holly Hill Estate is the future Wynnstone Residential Planned Unit Development. This community is currently under review and is entitled to develop a maximum of 1,984 single-family lots (4.99 Du/Ac).

With the goals and objectives of the North Ridge Selected Area Plan and the close proximity to high density residential development and large-scale commercial development, the proposed Future Land Use amendment from Employment Center (ECX) to Residential High (RHX) will permit a transitional use between the urbanized development pattern on US HWY 27 to the lower density communities west of the subject site.

2. Provide a site plan showing each type of existing and proposed land use.

Response:

A Conceptual Land Use Plan is attached (Appendix B). Existing and proposed Future Land Use Maps are included in this report (Exhibits 2 and 3).

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

Response:

The proposed Residential High (RHX) land use designation is consistent with the surrounding Future Land Uses and shall be developed consistent with the Polk County Land Development Code. A detailed site plan will be developed and submitted; any incompatibilities will be identified and mitigated at the time of review.

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

Response:

The proposed Residential High (RHX) land use designation will provide high density residential to an area of the county that is experiencing rapid growth. A majority of the properties adjacent to the subject site are developed or approved for development. The proposed change will enhance the current development patterns to create an overall mixed-use area with various types of residential and commercial development.

5. Describe each of the uses proposed in a future Planned Development, if land use amendment is approved and identify the following

a. The density and types of residential dwelling units:

Response:

A maximum of (20) dwelling units per acre is proposed. A detailed site plan showing the proposed development shall be submitted for review under a separate application.

b. The type of commercial and industrial uses:

Response:

Not applicable.

c. The approximate customer service area for commercial uses; and

Response:

Not applicable.

- d. The total area proposed for each type of use, including open space and recreation.

Response: Table 1.8.2

Total Project Area	14.61 Acres
Open Space	Minimum of 40% (5.84 Acres)
Recreation	500 Sq Ft per Dwelling Unit (3.35 Acres)

Access to Roads and Highways:

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

Response:

The project will produce (116) AM peak hour trips and (150) PM peak hour trips. A detailed Traffic Impact Assessment has been provided for review. See Appendix C.

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

Response:

Per the attached Traffic Impact Assessment, no significant modifications to the existing transportation system are required at this time. A detailed Traffic Impact Assessment has been provided for review. See Appendix C.

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

Response:

Multi-family apartments require two (2) spaces per unit. The proposed amendment will permit a maximum of (292) multi-family units, requiring a maximum of (584) parking spaces. Final determination shall be made with site plan review. A detailed Traffic Impact Assessment has been provided for review. See Appendix C.

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

Response:

Access to the subject site shall be provided on Holly Hill Grove 2. A secondary emergency access may be provided on Holly Hill Grove 1 and will be determined at site plan review. A detailed Traffic Impact Assessment has been provided for review. See Appendix C.

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

Response:

Alternate modes of transportation shall be evaluated with site plan review. A detailed Traffic Impact Analysis has been provided. See Appendix C.

Sewage:

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

Response: Per Policy 4.203-A2 the Level of Service for Sanitary Sewer Facilities is 270 gallons per day per equivalent residential connections (GPERC). See Table 1.8.3.

Table 1.8.3

Waste Water LOS	Total Acreage	Dwelling Units Estimated	LOS (GPD / Dwelling Unit)	Estimated Demand (GPD)
Residential	14.61	292	270	78,840 GPD

2. Describe the proposed method and level of treatment, and the method of effluent disposal for the proposed sewage treatment facilities if on-site treatment is proposed.

Response:

The proposed development shall connect to a centralized sanitary sewer owned and maintained by Polk County Utilities (PCU). The applicant will coordinate with PCU to verify sufficient capacity to serve the site is available.

3. Indicate the relationship of the proposed sewage system to Polk County's plans and policies for sewage treatment systems.

Response:

The proposed development will be served by Polk County Utilities (PCU). The applicant will coordinate with PCU to verify sufficient capacity to serve the site is available.

4. Identify the service provider

Response:

Polk County Utilities will provide potable, reclaim, and wastewater service to the property.

5. Indicate the current provider's capacity and anticipated date of connection.

Response:

The Applicant will coordinate with Polk County Utilities to ensure sufficient capacity to serve the site is available. It is anticipated that the property will connect to the wastewater system in 2026 / 2027.

Water Supply:

1. Indicate the proposed source of water supply and the type of treatment.

Response:

Polk County Utilities will provide the site with potable and reclaimed water services.

2. Identify the service provider.

Response:

Polk County Utilities will provide potable and wastewater service to the property.

3. Calculate the estimated volume of consumption in gallons per day (GPD)

Response: Per Policy 4.203-A2 the Level of Service for Potable Water is 360 gallons per day per equivalent residential connection (GPERC). See Table 1.8.4.

Table 1.8.4

Potable Water LOS	Total Acreage	Dwelling Units Estimated	LOS (GPD / Dwelling Unit)	Estimated Demand (GPD)
Residential	14.61	292	360	105,120 GPD

4. Indicate the current provider's capacity and anticipated date of connection.

Response:

The Applicant will coordinate with Polk County Utilities to ensure sufficient capacity to serve the site is available. It is anticipated that the property will connect to the potable water system in 2026 / 2027.

Surface Water Management and Drainage:

1. Discuss the impact the proposed development will have on surface water quality.

Response:

There are no existing surface water areas on the subject site that would be impacted by the proposed development. Stormwater management shall be provided via on-site detention ponds consistent with the Polk County and the Water Management District requirements.

2. Describe the alteration to the site's natural drainage features, including wetlands, that would be necessary to develop the project.

Response:

No wetlands have been identified on the subject site and the site is within Flood Zone X (Exhibit 6). The existing drainage basin will be maintained via on-site detention consistent with the Polk County Land Development Code and Southwest Florida Water Management District.

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

Response:

A detailed Environmental Assessment shall be submitted under a separate cover.

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

Response:

The subject site is not in a high priority Aquifer Recharge Area. No on-site wells are proposed that would impact the ground water conditions. The master stormwater system will provide treatment and attenuation for the on-site improvements and will be designed and constructed consistent with the Polk County Land Development Code and Southwest Florida Water Management District.

Population:

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

Response:

The development of the subject site proposed 292 dwelling units (20 Du/Ac). An average of 2.61 residents per household per the BEBR *Households and Average Household Size in Florida* will result in an estimated generated population of 763 people.

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

Response:

Not applicable.

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

Response:

According to the 2020 Decennial Census for the zip code (33837) in which the area of work is located, the population was (36,302) people. See Table 1.8.5.

Table 1.8.5

Population	
Population	36,302
Age and Sex	
Persons under 5 years, percent	7.1%
Persons under 18 years, percent	24.50%
Persons 65 years and over, percent	16.10%
Female persons, percent	48.99%
Race and Hispanic Origin	
White alone, percent	52.10%
Black or African American alone, percent	9.71%
American Indian and Alaska Native alone, percent	0.66%
Asian alone, percent	2.24%
Native Hawaiian and Other Pacific Islander alone, percent	0.06%
Other Race alone	15.67%
Two or More Races, percent	19.57%

Per ACS, the total number of households recorded in the 2020 Census for the zip code (33837) in which the area of work is located, was (15,223) households. The median household income for the proposed developments zip code was \$75,861.

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

Response:

Not applicable.

General Information:

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

Response:

The proposed residential development will provide housing in close proximity to the employment centers along US HWY 27.

2. Discuss the demand on the provision for the following services.

a. Parks and Recreation;

Response:

Polk County estimates a need of 6.95 acres of public parks and open space per 1,000 people. The HHG2 development proposes 763 residents, which projects a need of 5.30 acres of public park and open space land. The closest recreation to the proposed residential development is the east trailhead of the Hilochee Wildlife Management Area, about 2.5 miles from the subject site. This trail access provides access to approximately 3.5 miles of trail.

The proposed residential development will provide a minimum of 500 square feet of recreation space for each dwelling unit for a total of 3.35 acres of park space of the projected 5.30 acres of needed public park / open space. The remaining 1.95 acres of park / open space will be provided via the remaining 2.49 acres of open space required on-site.

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

Response:

Bella Cita Elementary, Citrus Ridge K-8 Middle School, and Ridge Community Senior High School is within proximity of the subject site. See Table 1.7.1. A School Capacity Determination letter has been submitted (Appendix A).

c. Health Care (Emergency / Hospital);

Response:

Heart of Florida Medical Center is approximately 1.8 miles from the subject site. See Table 1.7.2.

d. Fire Protection;

Response:

Polk County Fire Station 38 is approximately 0.6 miles from the subject site. See Table 1.7.2.

e. Police Protection and Security;

Response:

Polk County Sheriff's office is approximately 3.9 miles from the subject site. See Table 1.7.2.

f. Electrical Power Supply.

Response:

Duke Energy provides electrical services to this area of Polk County.

Maps:

1. Maps shall be used to give the public agencies a clear graphic illustration and visual understanding of the proposed development and the potential positive and negative impacts resulting from the development.

Response:

Acknowledged, please see Exhibits 1 through 7.

2. Maps shall be of sufficient type, size, and scale to facilitate complete understanding of the elements of the proposed development. Scales shall be clearly indicated on each map and the dates of preparation and revisions shall be included. The project boundaries shall be overlaid on all maps. The following maps shall accompany all Impact Assessment Statements:

Response:

Acknowledged, please see Exhibits 1 through 9.

3. Map A: A location map showing the relationship of the development to cities, highways, and natural features;

Response:

A location map is included within this report (Exhibit 1).

4. Map B: A Topographical Map with contour intervals of no greater than five feet, the identification of the property boundaries, and a delineation of the areas of special flood hazard (100 year flood plain) as shown on the Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA) for Polk County;

Response:

A Topographic Map is included within this report (Exhibit 4).

5. Map C: A Land Use and Land Use District Map showing the existing land use designations and districts on and abutting the proposed development, including lot sizes and density;

Response:

A Future Land Use map is included within this report (Exhibits 2, 3, and 7).

6. Map D: A Soils Map with soils designated according to Natural Resources Conservation Service classifications. If available, USDA Natural Resources Conservation Service (NRCS) soil surveys are preferable;

Response:

A Soils Map is included within this report (Exhibit 5).

7. Map E: A Traffic Circulation Map identifying any existing roads on or adjacent to the proposed development and indicating the name of the roads, maintenance jurisdiction, and pavement and right-of-way widths.

Response:

A Traffic Circulation Map is included within this report (Exhibit 8). A Traffic Impact Assessment has been provided (Appendix C).

8. Map F: A Site Plan showing land uses, the layout of lots, the type and maximum density for each type of residential area; the typical minimum lot sizes and dimensions for each use and unit type, and the dimensions, locations, and types of buffers, easements, open space areas, parking and loading areas, setbacks, and vehicular circulation routes; and

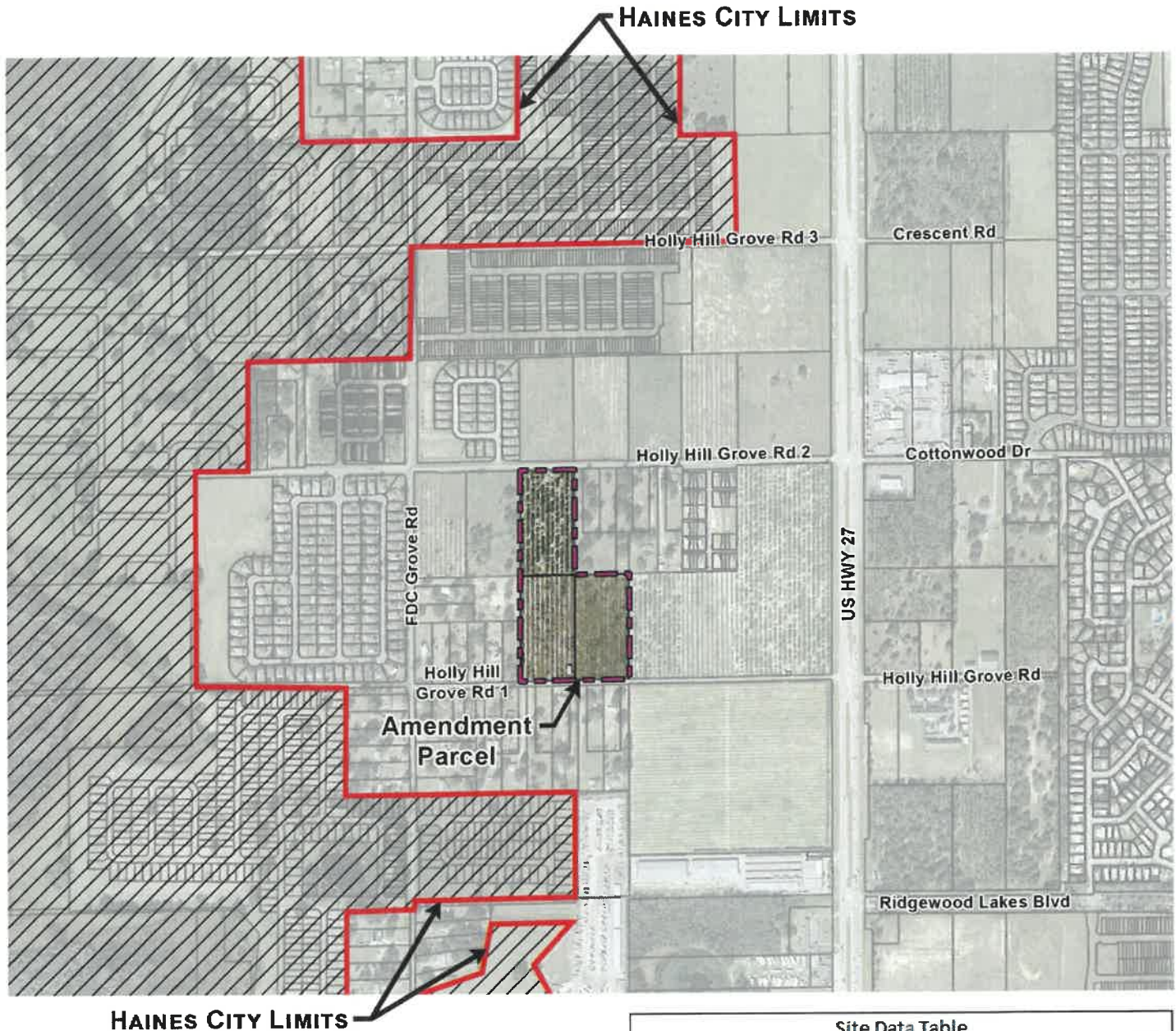
Response:

A Site Plan for the residential development has not been developed. A detailed site plan will be submitted at a future date. All development shall be consistent with the Polk County Land Development Code, which provides the requested information.

9. Map G: A Drainage Map delineating existing and proposed drainage areas, water retention areas, drainage structures, drainage easements, canals, wetlands, watercourses, and other major drainage features.

Response:

A Drainage Map is included within this report (Exhibit 9). There are no existing drainage structures, canals, wetlands, watercourses, or other major drainage features present on-site. A Site Plan for the residential development has not been developed at the time of this report. A detailed Site Plan will be submitted at a future date. All development shall be consistent with the Polk County Land Development Code, which provides the requested information.



Site Data Table			
Road name	Maintenance Jurisdiction	Paved	R/W Width
FDC Grove Rd	Local Road	Yes	55'
Holly Hill Grove Rd 1	Local Road	Yes	40'
Holly Hill Grove Rd 2	Local Road	Yes	40'
Holly Village Dr	Privately Owned and Maintained	Yes	Private
US HWY 27	Arterial Highway	Yes	120'



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Urban Planning · Landscape Architecture · Project Management

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Phone 407.740.7373 · www.dalydesign.com

Job No.: 25201 Scale: nts Date: 05.01.2025

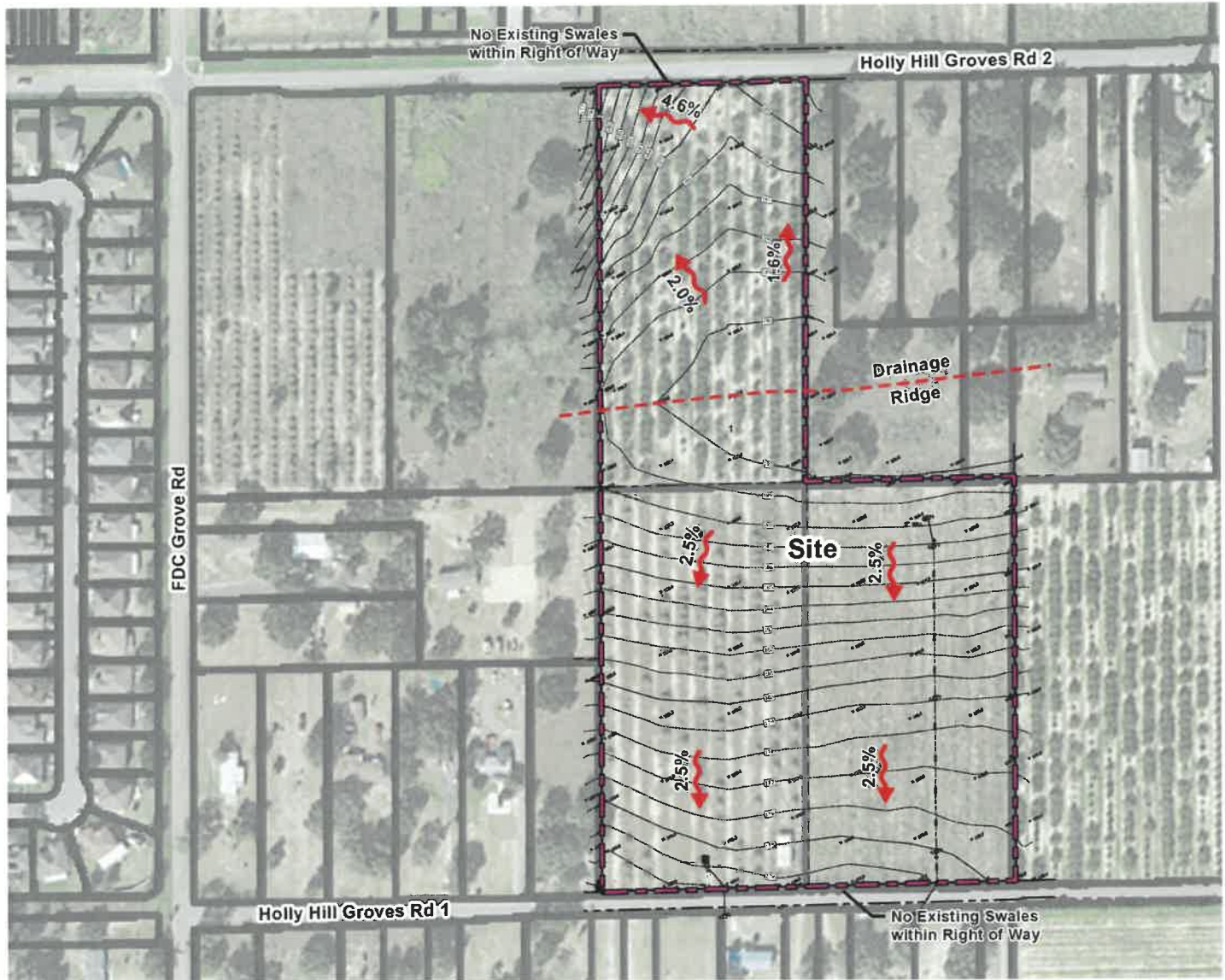
GPK HHG2

Polk County, Florida

Exhibit 8

Traffic Circulation Map





GPK HHG2

Polk County, Florida

Exhibit 9

Existing Drainage Map



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 Job No.: 25201 Scale: nts Date: 05.07.2025



1.9 Green Swamp Impact Assessment Statements:

1. Flood Plain development requirements in this Code under Section 3.11.07D, where applicable.

Response:

Per FEMA Map Panel 12105C0225G, the site is not within a flood zone (Exhibit 6).

2. Wetland development requirements in this Code under Section 3.11.07E, where applicable.

Response:

No wetlands have been identified on the subject site.

3. Minimize the adverse impacts of development on resources of the Floridian Aquifer, wetlands, and flood detention areas.

Response:

Polk County Utilities will provide potable and wastewater services to the subject site and no wells are proposed. There are no wetlands that have been identified on site and the master stormwater management area will be designed and constructed consistent with the Land Development Code, Water Management District, and Green Swamp regulations. A detailed Site Plan will be provided at the time of Preliminary Plan review.

4. Protect or improve the normal quantity, quality, and flow of ground water and surface water which are necessary for the protection of resources of state and regional concern.

Response:

The flow of ground and surface water will be managed in accordance with the Land Development Code, Water Management District, and Green Swamp regulations.

5. Protect or improve the water available for the aquifer recharge.

Response:

The proposed residential development will be designed and constructed consistent with regulatory requirements. It is not anticipated that the proposed development on the subject site will impact available water capacity or the ability for the aquifer to recharge. The subject site is not within a wellfield protection district. The soils on-site are Candler 0-5% slope and the subject site is not within an identified high recharge areas.

6. Protect or improve the functions of the Green Swamp Potentiometer High of the Floridian Aquifer.

Response:

No wells are proposed on site and it is not anticipated that the proposed residential development will have any impacts to the Green Swamp Potentiometer High of the Floridian Aquifer.

7. Protect or improve the normal supply of ground and surface water.

Response:

The subject site will be served by Polk County Utilities. No on-site wells that would have an impact on the ground water are proposed. The master stormwater management system is anticipated to be a dry detention pond and will be designed and constructed consistent with regulatory requirements of the Land Development Code and Water Management District.

8. Prevent further salt water intrusion into the Floridian Aquifer.

Response:

The subject site is not within a salt water intrusion area of concern. The proposed development will be served by centralized utilities provided by Polk County Utilities.

9. Protect or improve existing ground and surface water quality.

Response:

The subject site will be served by Polk County Utilities. No on-site wells that would have an impact on ground water are proposed. The master stormwater management system is anticipated to be a dry detention pond and will be designed and constructed consistent with regulatory requirements of the Land Development Code and Water Management District.

10. Protect or improve the water retention capabilities of wetlands.

Response:

The subject site does not contain any wetlands on site. The proposed development will not have an impact on wetlands.

11. Protect or improve the biological filtering capabilities of wetlands.

Response:

The subject site does not contain any wetlands on-site. The proposed development will not have an impact on wetlands.

12. Protect or improve the natural flow regime of drainage basins.

Response:

The natural flow regime of drainage basins will be designed and constructed in accordance with the requirements of the Polk County Land Development Code and Water Management District.

13. Protect or improve the design capacity of flood detention areas and the water management objectives of these areas through the maintenance of hydraulic characteristics of drainage basins.

Response:

The master stormwater pond will be designed and constructed in accordance with the requirements of the Polk County Land Development Code and Water Management District.

APPENDIX A
LAKE COUNTY SCHOOLS CAPACITY DETERMINATION



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

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



**1915 S. Floral Ave.
Bartow, FL 33830**



**P.O. Box 391
Bartow, FL 33831**



863-534-0500



polkschoolsfl.com

APPENDIX B
CONCEPTUAL LAND USE PLAN
PREPARED BY: DALY DESIGN GROUP



GPK HHG2

Polk County, FL

Site Data

Gross Land Area	14.61 AC
①- 27-26-30-708000-010030	4.87 AC
②- 27-26-30-708000-010130	4.87 AC
③- 27-26-30-708000-010140	4.87 AC
Total Wetlands	0.00 AC
Total Flood Zone	0.00 AC
Maximum Multi-Family Dwelling Units	292 Units

Conceptual Site Plan

daly design group
Urban Planning · Landscape Architecture · Project Management
913 N Pennsylvania Ave., Winter Park Florida 32789
Phone 407.740.7373 · www.dalydesign.com
Job No : 25201 Scale: NTS Date: 03.20.2025



NR-01

APPENDIX C
CONCEPTUAL TRAFFIC IMPACT ASSESSMENT
PREPARED BY: RAYSOR TRANSPORTATION CONSULTING



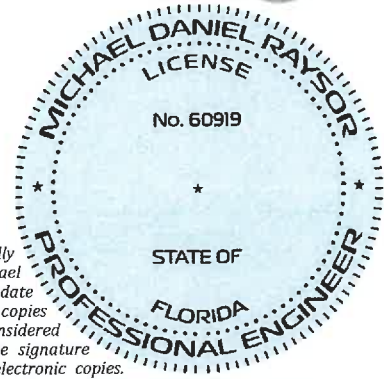
TECHNICAL MEMORANDUM

TO: GPK SE HOLDING, LLC
8615 COMMODITY CIRCLE, SUITE 17
ORLANDO, FLORIDA 32819

FROM: MICHAEL D. RAYSOR, P.E.
RAYSOR TRANSPORTATION CONSULTING, LLC

SUBJECT: HOLLY HILL DEVELOPMENT
TRAFFIC IMPACT ASSESSMENT STATEMENT

DATE: APRIL 23, 2025



This item has been digitally signed and sealed by Michael Daniel Raysor P.E., on the date adjacent to the seal. Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.

1.0 | INTRODUCTION

This technical memorandum documents a Traffic Impact Assessment Statement prepared in support of a proposed Land Use District Modification for the “Holly Hill Development”. The subject 19.24 acre project site consists of parcel #'s 272630708000010010, 272630708000010030, 272630708000010130, and 272630708000010140, located east of FDC Grove Road, between Holly Hill Grove Road 1 and Holly Hill Grove Road 2, in Polk County, Florida; as shown in **FIGURE 1.0**. The Land Use District Modification is being sought to modify the current Employment Center (ECX) land use district to the Residential High (RHX) land use district.

This Traffic Impact Assessment Statement was performed in accordance with §910.B of the Polk County Land Development Code, as follows:

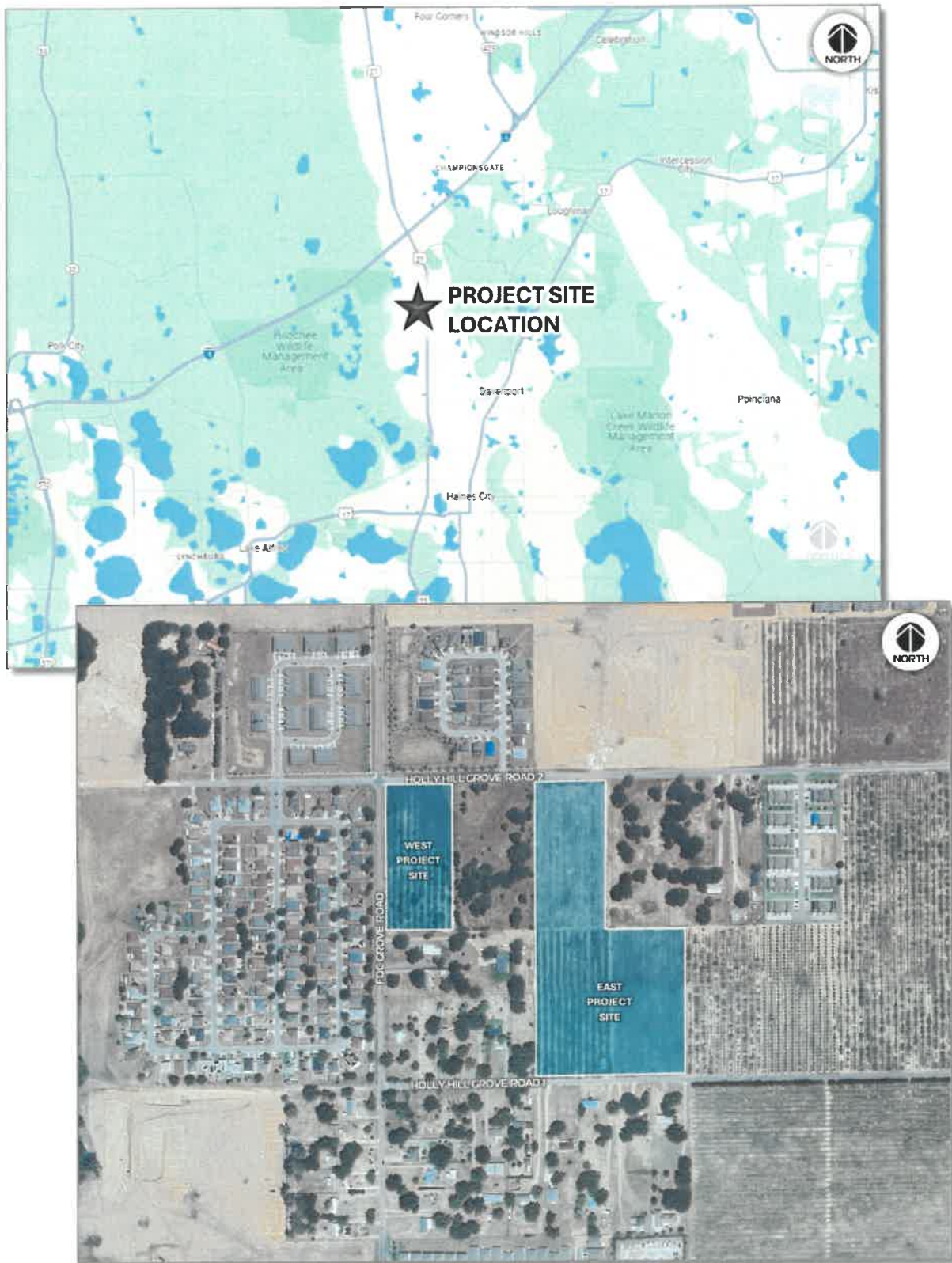
POLK COUNTY LDC §910.B

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

1. *Calculate the number of vehicle trips to be generated daily and at PM peak hour based on the latest ITE or provide a detailed methodology and calculations;*
2. *Indicate what modifications to the present transportation system will be required as a result of the proposed development;*
3. *List the total number of parking spaces and describe the type of parking facilities to be provided in the proposed development;*
4. *Indicate the proposed methods of access to the existing public roads (e.g., direct frontage, intersecting streets, frontage roads); and*
5. *Indicate the modes of transportation, other than the automobile, that have been considered (e.g., pedestrian, bicycle, bus, train or air) and describe the modes.*



FIGURE 1.0 | PROJECT SITE LOCATION





2.0 | LAND USE DEVELOPMENT POTENTIAL

The maximum development potential for the current and proposed land use district scenarios for the subject project was identified in accordance with §2.131-Q of the Polk County Comprehensive Plan; noting that the project site is located within the North Ridge Selected Area Plan.

The ECX classification in the North Ridge Selected Area Plan is intended to accommodate the employment and functional needs of the urbanizing northeast area of the County. The ECX will generally contain office and support facilities, college and university uses, commercial, light assembly, and limited warehousing uses. The maximum intensity of development has a baseline floor-area-ratio (FAR) of 0.70, which can be increased up to 2.0 through bonus points; where commercial is limited to 30% of development with a maximum floor-area-ratio (FAR) of 1.0.

Given the above floor-area-ratios, the 19.24 acre (838,094 square foot) site can support between 586,665 and 1,676,188 square feet of development without commercial; and between 586,665 and 1,424,760 square feet of development with 30% (of total site acreage) as commercial; with the range dependent upon qualifying bonus density. For the purposes of this analysis, the following four (4) development scenarios were assumed for the current ECX land use district, which provides for a reasonable representation of potential development within the allowable FAR range:

SCENARIO A (Baseline Scenario w/o Commercial)

- 234,666 sf Professional Office [40%]
- 117,333 sf Medical Office [20%]
- 234,666 sf Light Industrial [40%]

SCENARIO B (Baseline Scenario w/ Commercial)

- 176,000 sf Commercial [30%]
- 176,000 sf Professional Office [30%]
- 58,665 sf Medical Office [10%]
- 176,000 sf Light Industrial [30%]

SCENARIO C (Bonus Intensity Scenario w/o Commercial)

- 670,475 sf Professional Office [40%]
- 335,238 sf Medical Office [20%]
- 670,475 sf Light Industrial [40%]

SCENARIO D (Bonus Intensity Scenario w/ Commercial)

- 250,000 sf Commercial [30% of total site acreage / 17.5% of development square footage]
- 476,960 sf Professional Office [33.4%]
- 220,840 sf Medical Office [15.5%]
- 476,960 sf Light Industrial [33.4%]



The RHX classification in the North Ridge Selected Area Plan is characterized by multi-story, multi-family units, with a baseline maximum density of 10 dwelling units per acre, which can be increased up to 20 dwelling units per acre through bonus points. For the purposes of this analysis, the following three (3) development scenarios were assumed for the proposed RHX land use district, which provides for a reasonable representation of potential development within the allowable range of permitted density, including the applicant's intended density.

SCENARIO E (Baseline Scenario)

- 192 dwelling units

SCENARIO F (Bonus Intensity Scenario)

- 385 dwelling units

SCENARIO G (Applicant Scenario)

- 300 dwelling units

3.0 | TRIP GENERATION ESTIMATES

The daily and peak hour trip generation for the subject project was estimated for the current and proposed land use district scenarios using the Institute of Transportation Engineers (ITE) Trip Generation Manual (11TH EDITION); as summarized in [TABLE 1.0](#), and further documented in [ATTACHMENT A](#). It is noted that reductions were not made for internal capture or pass-by capture in consideration that this is a planning level analysis. The proposed Land Use District Modification was found to result in a significant decrease in trip generation potential for the project site.

TABLE 1.0 | TRIP GENERATION SUMMARY

Land Use District	Scenario	Weekday			AM Peak Hour			PM Peak Hour		
		Total	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit
ECX	A	8,516	4,258	4,258	801	680	121	964	220	744
	B	11,684	5,842	5,842	699	563	136	1,213	419	794
	C	23,640	11,820	11,820	2,072	1,759	313	2,603	606	1,997
	D	25,486	12,743	12,743	1,697	1,395	302	2,663	823	1,840
RHX	E	1,306	653	653	82	20	62	103	65	38
	F	2,544	1,272	1,272	142	34	108	186	117	69
	G	1,998	999	999	116	28	88	150	95	55



4.0 | IMPACT ASSESSMENT

The following presents each of the (traffic) impact assessment criteria, along with responses.

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

As shown in TABLE 1.0, the proposed Land Use District Modification has a trip generation range between 1,306 and 2,544 daily trips, depending on the qualifying amount of bonus density; with a trip generation of 1,998 daily trips for the applicant's intended density (300 dwelling units). The proposed Land Use District Modification has a trip generation range between 103 and 186 PM peak hour trips, depending on the qualifying amount of bonus density; with a trip generation of 150 PM peak hour trips for the applicant's intended density (300 dwelling units). The trip generation estimates for the proposed land use district of RHX are significantly lower than the potential trip generation for the current land use district of ECX.

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

In consideration of the significant decrease in potential trip generation associated with the proposed Land Use District Modification, no specific modifications to the present transportation system are required at this time. During subsequent development stages, a Traffic Impact Study will be performed in accordance with Polk County Land Development Code to determine specific mitigation for traffic impacts attributable to the subject project.

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

The subject Land Use District Modification is a planning function which precedes the development stages during which it is appropriate to evaluate parking demand & supply. The determination of parking and the design of needed parking facilities will be undertaken in accordance with the Polk County Land Development code during the appropriate stage of development permitting.

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

The subject project site has frontage along Holly Hill Grove Road 1 and Holly Hill Grove Road 2. Site access driveway connections are anticipated along both of these roadways, which shall be in accordance with the Polk County Land Development Code. Access to the regulated roadway network will be facilitated via FDC Grove Road and US Highway 27, where the evaluation of these roadways and associated intersections will be conducted with the preparation of the Traffic Impact Study during subsequent development stages.

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

The subject Land Use District Modification is a planning function which precedes the development stages during which it is appropriate to evaluate alternative transportation modes; where alternative transportation modes will be addressed in accordance with Land Development Code regulations at the appropriate stage of development.

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario A

SCENARIO A (Current Land Use District -- Baseline Scenario w/o Commercial)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
210	Light Industrial	234,666 sf	4.87	1,144	0.74	174	153	21	0.65	153	21	132
710	General Office	234,666 sf	$\ln(T)=0.87^*$ $\ln(X)+3.05$	2,438	$\ln(T)=0.86^*$ $\ln(X)+1.16$	349	307	42	$\ln(T)=0.83^*$ $\ln(X)+1.29$	337	57	280
720	Medical Office	117,333 sf	$T=42.97(X)$ -108.01	4,934	$\ln(T)=0.90^*$ $\ln(X)+1.34$	278	220	58	$T=4.07(X)$ -3.17	474	142	332
TOTAL			--	8,516	--	801	680	121	--	964	220	744

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario B

SCENARIO B (Current Land Use District -- Baseline Scenario w/ Commercial)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
210	Light Industrial	176,000 sf	4.87	858	0.74	130	114	16	0.65	114	16	98
710	General Office	176,000 sf	$\ln(T)=0.87^* \ln(X)+3.05$	1,898	$\ln(T)=0.86^* \ln(X)+1.16$	272	239	33	$\ln(T)=0.83^* \ln(X)+1.29$	265	45	220
720	Medical Office	58,665 sf	$T=42.97(X)^{-108.01}$	2,414	$\ln(T)=0.90^* \ln(X)+1.34$	149	118	31	$T=4.07(X)^{-3.17}$	236	71	165
820	Shopping Center	176,000 sf	37.01	6,514	0.84	148	92	56	3.40	598	287	311
TOTAL			--	11,684	--	699	563	136	--	1,213	419	794

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario C

SCENARIO C (Current Land Use District -- Bonus Intensity Scenario w/o Commercial)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
210	Light Industrial	670,475 sf	4.87	3,266	0.74	496	436	60	0.65	436	61	375
710	General Office	670,475 sf	$\ln(T)=0.87* \ln(X)+3.05$	6,076	$\ln(T)=0.86* \ln(X)+1.16$	860	757	103	$\ln(T)=0.83* \ln(X)+1.29$	806	137	669
720	Medical Office	335,238 sf	$T=42.97(X)^{-108.01}$	14,298	$\ln(T)=0.90* \ln(X)+1.34$	716	566	150	$T=4.07(X)^{-3.17}$	1,361	408	953
TOTAL			--	23,640	--	2,072	1,759	313	--	2,603	606	1,997

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario D

SCENARIO D (Current Land Use District -- Bonus Intensity Scenario w/ Commercial)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
210	Light Industrial	476,960 sf	4.87	2,324	0.74	353	311	42	0.65	310	43	267
710	General Office	476,960 sf	$\ln(T)=0.87 \cdot \ln(X)+3.05$	4,526	$\ln(T)=0.86 \cdot \ln(X)+1.16$	642	565	77	$\ln(T)=0.83 \cdot \ln(X)+1.29$	607	103	504
720	Medical Office	220,840 sf	$T=42.97(X)^{-108.01}$	9,382	$\ln(T)=0.90 \cdot \ln(X)+1.34$	492	389	103	$T=4.07(X)^{-3.17}$	896	269	627
820	Shopping Center	250,000 sf	37.01	9,254	0.84	210	130	80	3.40	850	408	442
TOTAL			--	25,486	--	1,697	1,395	302	--	2,663	823	1,840

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario E

SCENARIO E (Proposed Land Use District -- Baseline Scenario)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
220	Multi-Family Residential	192 units	T=6.41(X) +75.31	1,306	T=0.31(X) +22.85	82	20	62	T=0.43(X) +20.55	103	65	38

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario F

SCENARIO F (Proposed Land Use District -- Bonus Intensity Scenario)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
220	Multi-Family Residential	385 units	T=6.41(X) +75.31	2,544	T=0.31(X) +22.85	142	34	108	T=0.43(X) +20.55	186	117	69

ATTACHMENT A



HOLLY HILL DEVELOPMENT Trip Generation Estimate – Scenario G

SCENARIO G (Proposed Land Use District -- Applicant Scenario)

ITE LUC	Land Use Description	Size	Weekday		AM Peak Hour				PM Peak Hour			
			Rate	Trips	Rate	Trips	Enter	Exit	Rate	Trips	Enter	Exit
220	Multi-Family Residential	300 units	T=6.41(X) +75.31	1,998	T=0.31(X) +22.85	116	28	88	T=0.43(X) +20.55	150	95	55

Land Use: 110

General Light Industrial

Description

A light industrial facility is a free-standing facility devoted to a single use. The facility has an emphasis on activities other than manufacturing and typically has minimal office space. Typical light industrial activities include printing, material testing, and assembly of data processing equipment. Industrial park (Land Use 130) and manufacturing (Land Use 140) are related uses.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 2000s, and the 2010s in Colorado, Connecticut, Indiana, New Jersey, New York, Oregon, Pennsylvania, and Texas.

Source Numbers

106, 157, 174, 177, 179, 184, 191, 251, 253, 286, 300, 611, 874, 875, 912

General Light Industrial (110)

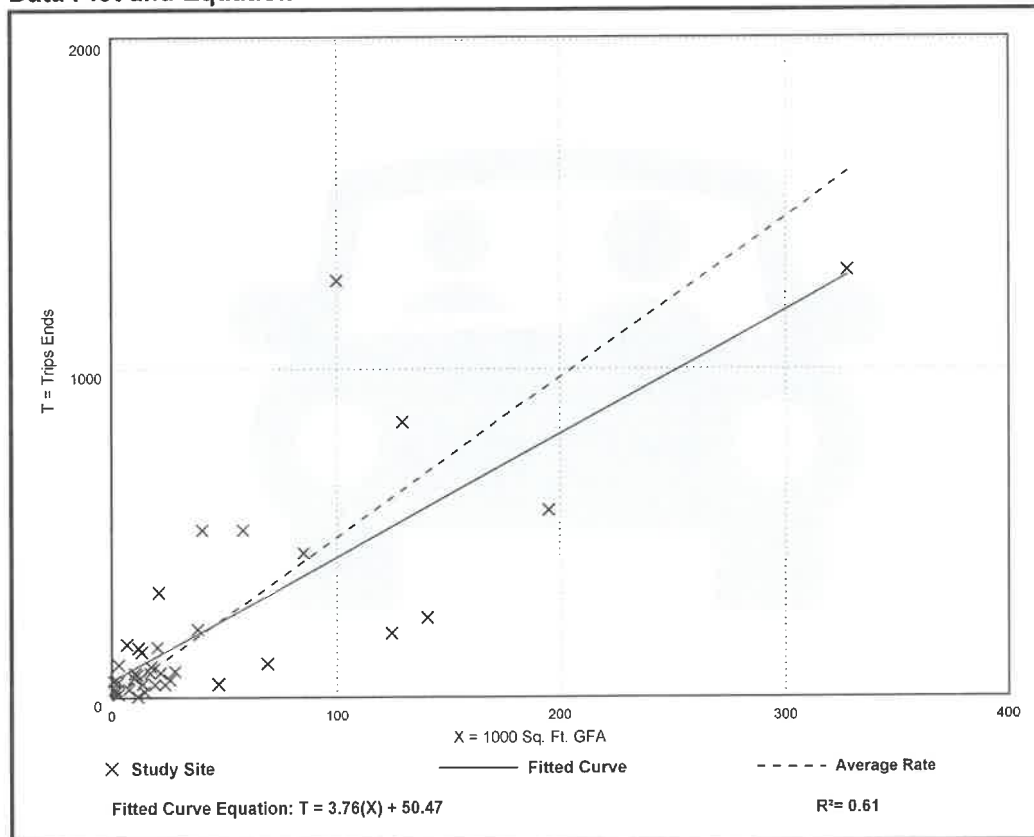
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 37
Avg. 1000 Sq. Ft. GFA: 45
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
4.87	0.34 - 43.86	4.08

Data Plot and Equation



General Light Industrial (110)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 41

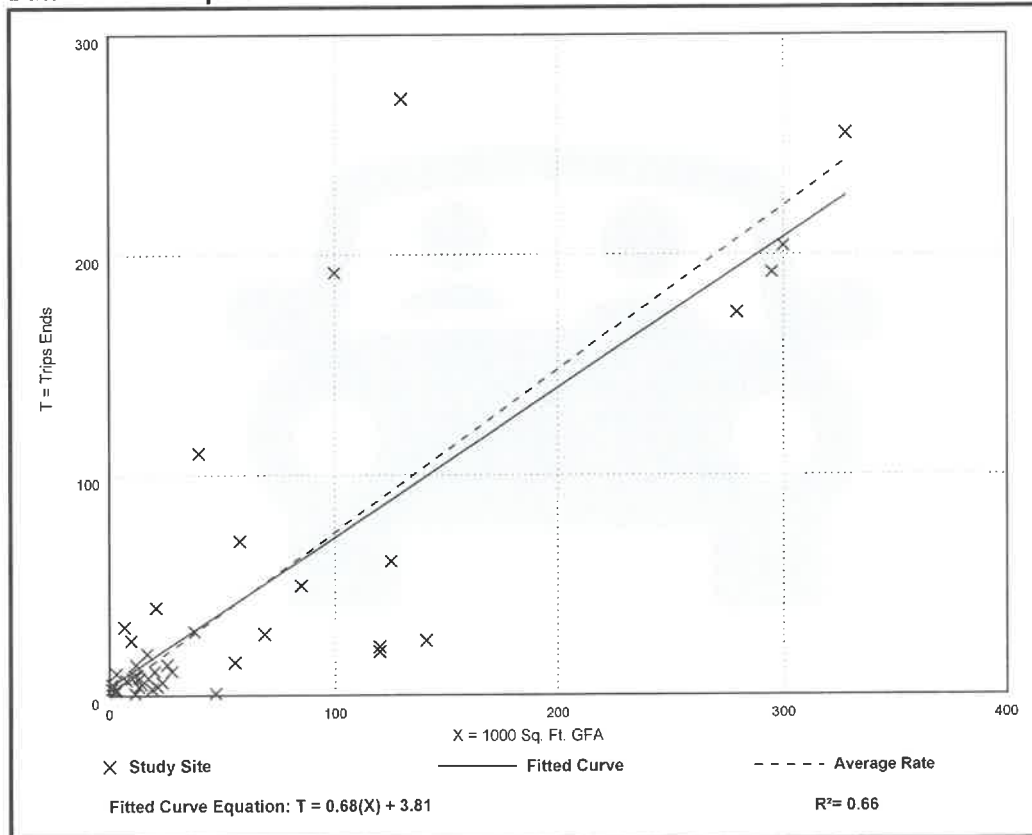
Avg. 1000 Sq. Ft. GFA: 65

Directional Distribution: 88% entering, 12% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.74	0.02 - 4.46	0.61

Data Plot and Equation



General Light Industrial (110)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 40

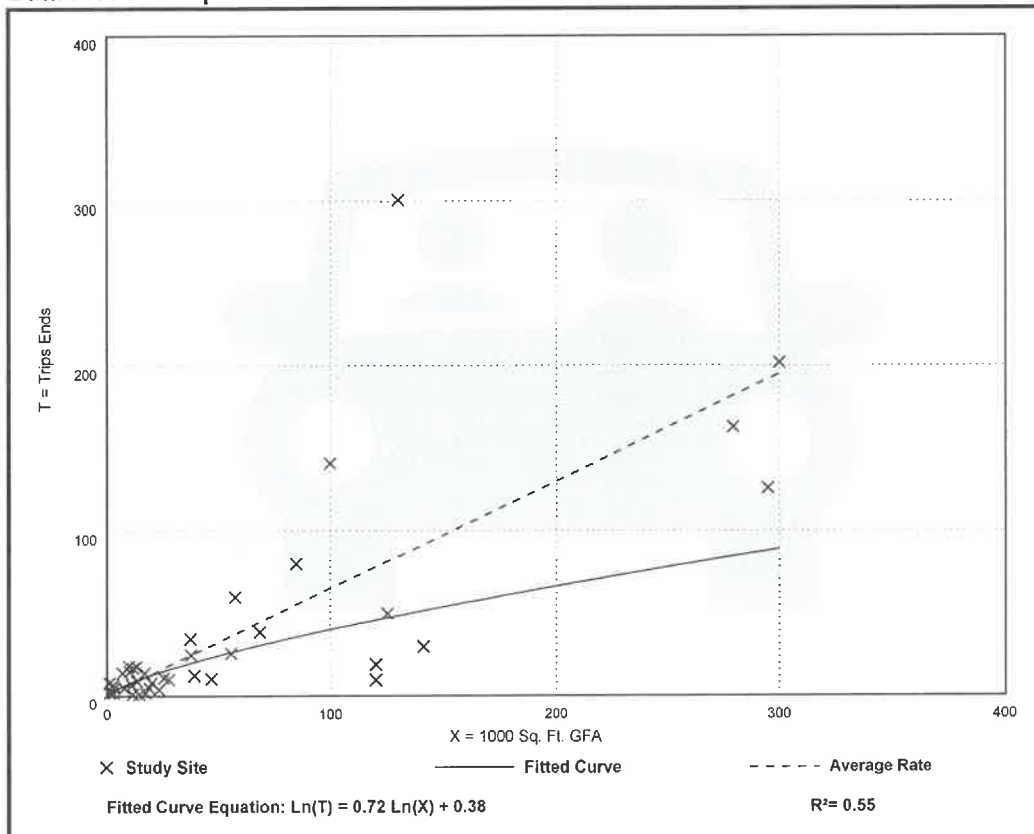
Avg. 1000 Sq. Ft. GFA: 58

Directional Distribution: 14% entering, 86% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.65	0.07 - 7.02	0.56

Data Plot and Equation



Land Use: 220

Multifamily Housing (Low-Rise)

Description

Low-rise multifamily housing includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have two or three floors (levels). Various configurations fit this description, including walkup apartment, mansion apartment, and stacked townhouse.

- A walkup apartment typically is two or three floors in height with dwelling units that are accessed by a single or multiple entrances with stairways and hallways.
- A mansion apartment is a single structure that contains several apartments within what appears to be a single-family dwelling unit.
- A fourplex is a single two-story structure with two matching dwelling units on the ground and second floors. Access to the individual units is typically internal to the structure and provided through a central entry and stairway.
- A stacked townhouse is designed to match the external appearance of a townhouse. But, unlike a townhouse dwelling unit that only shares walls with an adjoining unit, the stacked townhouse units share both floors and walls. Access to the individual units is typically internal to the structure and provided through a central entry and stairway.

Multifamily housing (mid-rise) (Land Use 221), multifamily housing (high-rise) (Land Use 222), affordable housing (Land Use 223), and off-campus student apartment (low-rise) (Land Use 225) are related land uses.

Land Use Subcategory

Data are presented for two subcategories for this land use: (1) not close to rail transit and (2) close to rail transit. A site is considered close to rail transit if the walking distance between the residential site entrance and the closest rail transit station entrance is ½ mile or less.

Additional Data

For the three sites for which both the number of residents and the number of occupied dwelling units were available, there were an average of 2.72 residents per occupied dwelling unit.

For the two sites for which the numbers of both total dwelling units and occupied dwelling units were available, an average of 96.2 percent of the total dwelling units were occupied.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip

generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

For the three sites for which data were provided for both occupied dwelling units and residents, there was an average of 2.72 residents per occupied dwelling unit.

It is expected that the number of bedrooms and number of residents are likely correlated to the trips generated by a residential site. To assist in future analysis, trip generation studies of all multifamily housing should attempt to obtain information on occupancy rate and on the mix of residential unit sizes (i.e., number of units by number of bedrooms at the site complex).

The sites were surveyed in the 1980s, the 1990s, the 2000s, the 2010s, and the 2020s in British Columbia (CAN), California, Delaware, Florida, Georgia, Illinois, Indiana, Maine, Maryland, Massachusetts, Minnesota, New Jersey, Ontario (CAN), Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, and Washington.

Source Numbers

188, 204, 237, 300, 305, 306, 320, 321, 357, 390, 412, 525, 530, 579, 583, 638, 864, 866, 896, 901, 903, 904, 936, 939, 944, 946, 947, 948, 963, 964, 966, 967, 1012, 1013, 1014, 1036, 1047, 1056, 1071, 1076

Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 22

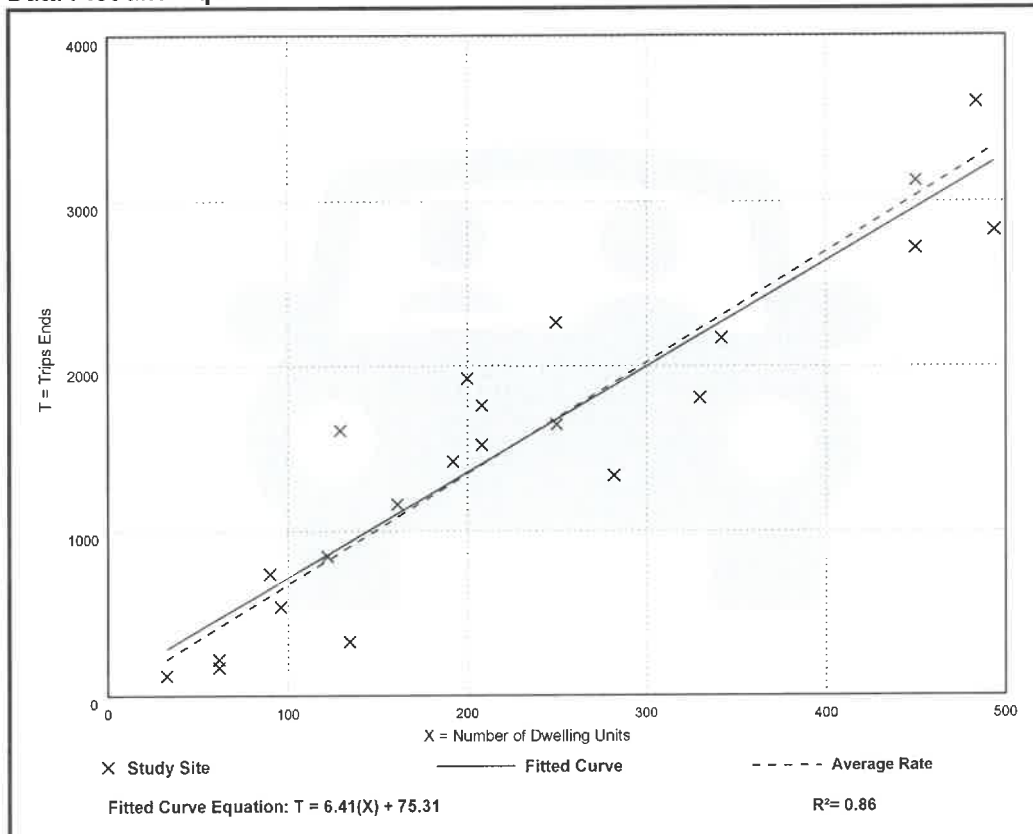
Avg. Num. of Dwelling Units: 229

Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
6.74	2.46 - 12.50	1.79

Data Plot and Equation



Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 49

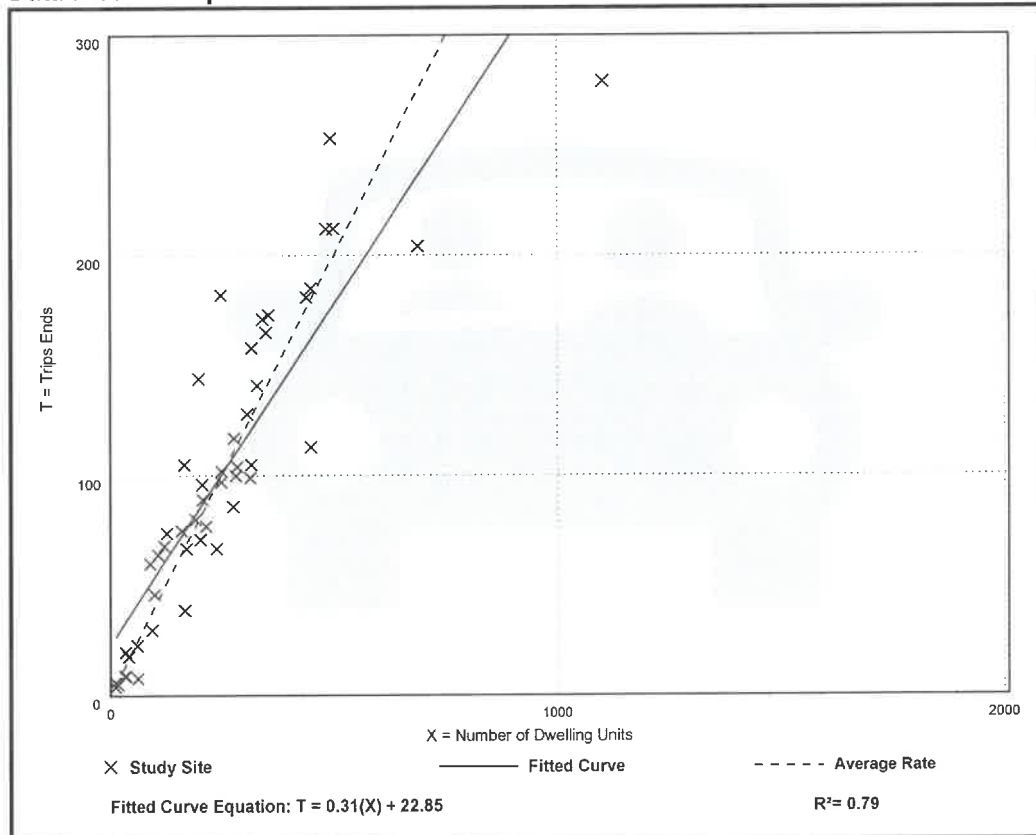
Avg. Num. of Dwelling Units: 249

Directional Distribution: 24% entering, 76% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.40	0.13 - 0.73	0.12

Data Plot and Equation



Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 59

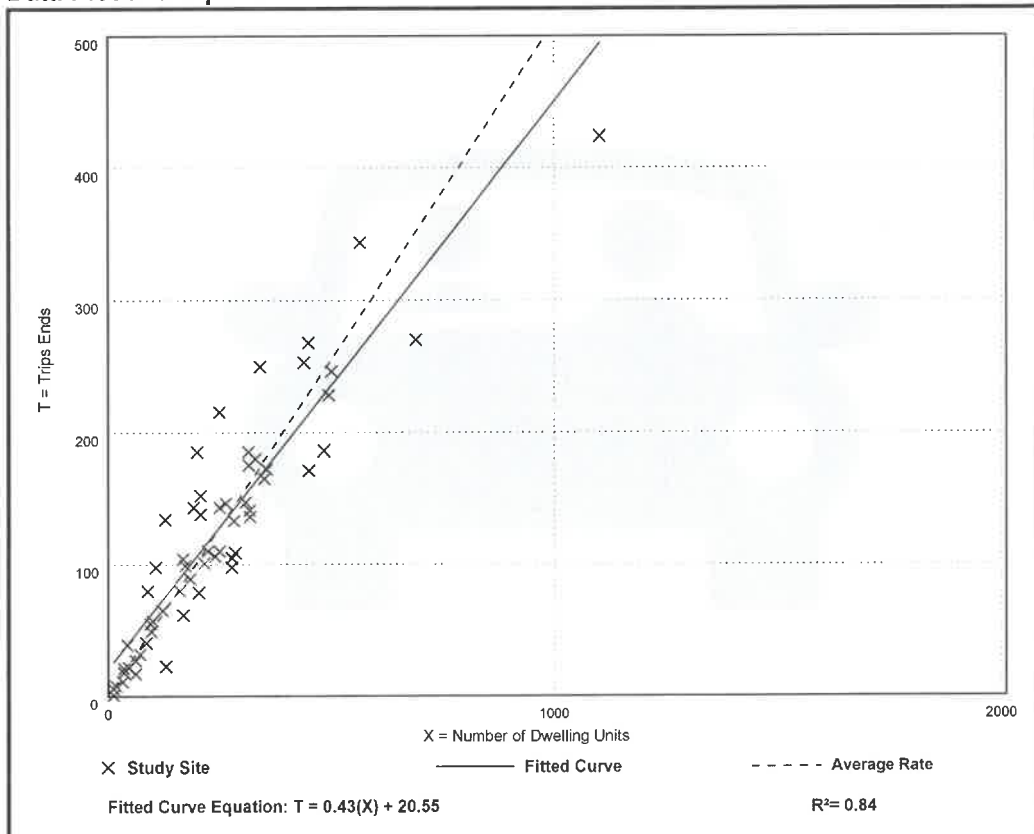
Avg. Num. of Dwelling Units: 241

Directional Distribution: 63% entering, 37% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.51	0.08 - 1.04	0.15

Data Plot and Equation



Land Use: 710

General Office Building

Description

A general office building is a location where affairs of businesses, commercial or industrial organizations, or professional persons or firms are conducted. An office building houses multiple tenants that can include, as examples, professional services, insurance companies, investment brokers, a banking institution, a restaurant, or other service retailers. A general office building with a gross floor area of 10,000 square feet or less is classified as a small office building (Land Use 712). Corporate headquarters building (Land Use 714), single tenant office building (Land Use 715), medical-dental office building (Land Use 720), office park (Land Use 750), research and development center (Land Use 760), and business park (Land Use 770) are additional related uses.

Additional Data

If two or more general office buildings are in close physical proximity (within a close walk) and function as a unit (perhaps with a shared parking facility and common or complementary tenants), the total gross floor area or employment of the paired office buildings can be used for calculating the site trip generation. If the individual buildings are isolated or not functionally related to one another, trip generation should be calculated for each building separately.

For study sites with reported gross floor area and employees, an average employee density of 3.3 employees per 1,000 square feet GFA (or roughly 300 square feet per employee) has been consistent through the 1980s, 1990s, and 2000s. No sites counted in the 2010s reported both GFA and employees.

The average building occupancy varies considerably within the studies for which occupancy data were provided. The reported occupied gross floor area was 88 percent for general urban/suburban sites and 96 percent for the center city core and dense multi-use urban sites.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The average numbers of person trips per vehicle trip at the eight center city core sites at which both person trip and vehicle trip data were collected are as follows:

- 2.8 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 2.9 during Weekday, AM Peak Hour of Generator
- 2.9 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 3.0 during Weekday, PM Peak Hour of Generator



The average numbers of person trips per vehicle trip at the 18 dense multi-use urban sites at which both person trip and vehicle trip data were collected are as follows:

- 1.5 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.5 during Weekday, AM Peak Hour of Generator
- 1.5 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 1.5 during Weekday, PM Peak Hour of Generator

The average numbers of person trips per vehicle trip at the 23 general urban/suburban sites at which both person trip and vehicle trip data were collected are as follows:

- 1.3 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.3 during Weekday, AM Peak Hour of Generator
- 1.3 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 1.4 during Weekday, PM Peak Hour of Generator

The sites were surveyed in the 1980s, the 1990s, the 2000s, the 2010s, and the 2020s in Alberta (CAN), California, Colorado, Connecticut, Georgia, Illinois, Indiana, Kansas, Kentucky, Maine, Maryland, Michigan, Minnesota, Missouri, Montana, New Hampshire, New Jersey, New York, Ontario (CAN), Pennsylvania, Texas, Utah, Virginia, and Washington.

Source Numbers

161, 175, 183, 184, 185, 207, 212, 217, 247, 253, 257, 260, 262, 273, 279, 297, 298, 300, 301, 302, 303, 304, 321, 322, 323, 324, 327, 404, 407, 408, 419, 423, 562, 734, 850, 859, 862, 867, 869, 883, 884, 890, 891, 904, 940, 944, 946, 964, 965, 972, 1009, 1030, 1058, 1061

General Office Building (710)

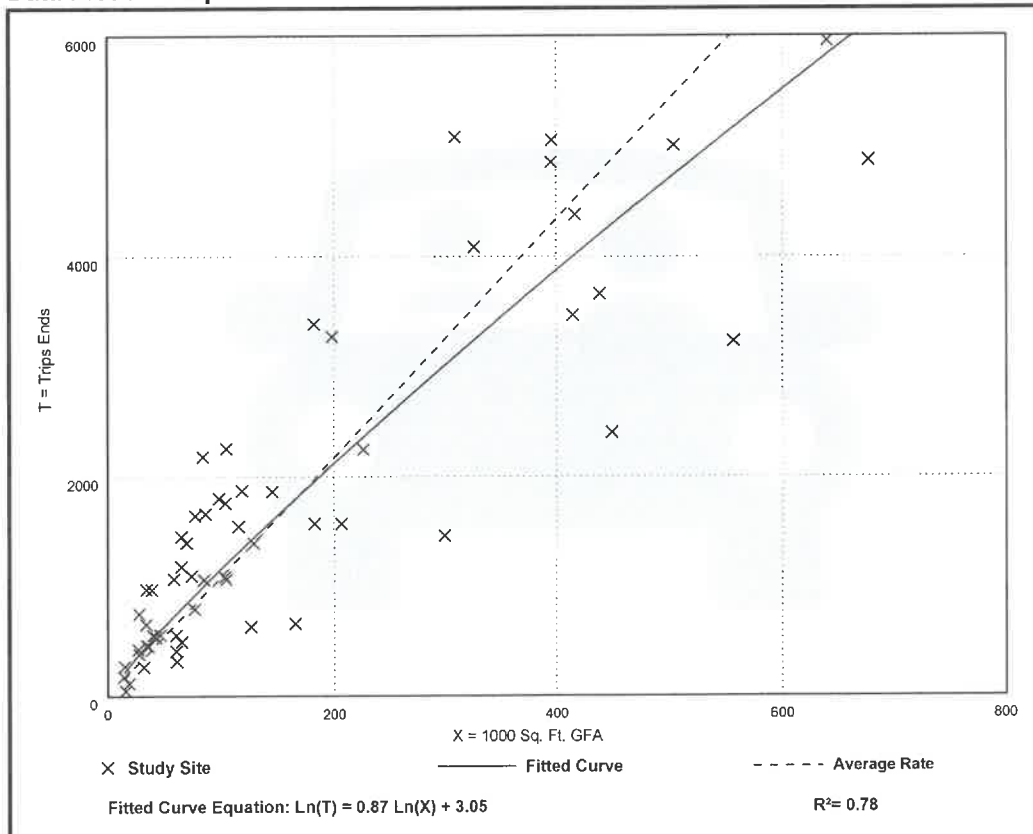
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 59
Avg. 1000 Sq. Ft. GFA: 163
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
10.84	3.27 - 27.56	4.76

Data Plot and Equation



General Office Building (710)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 221

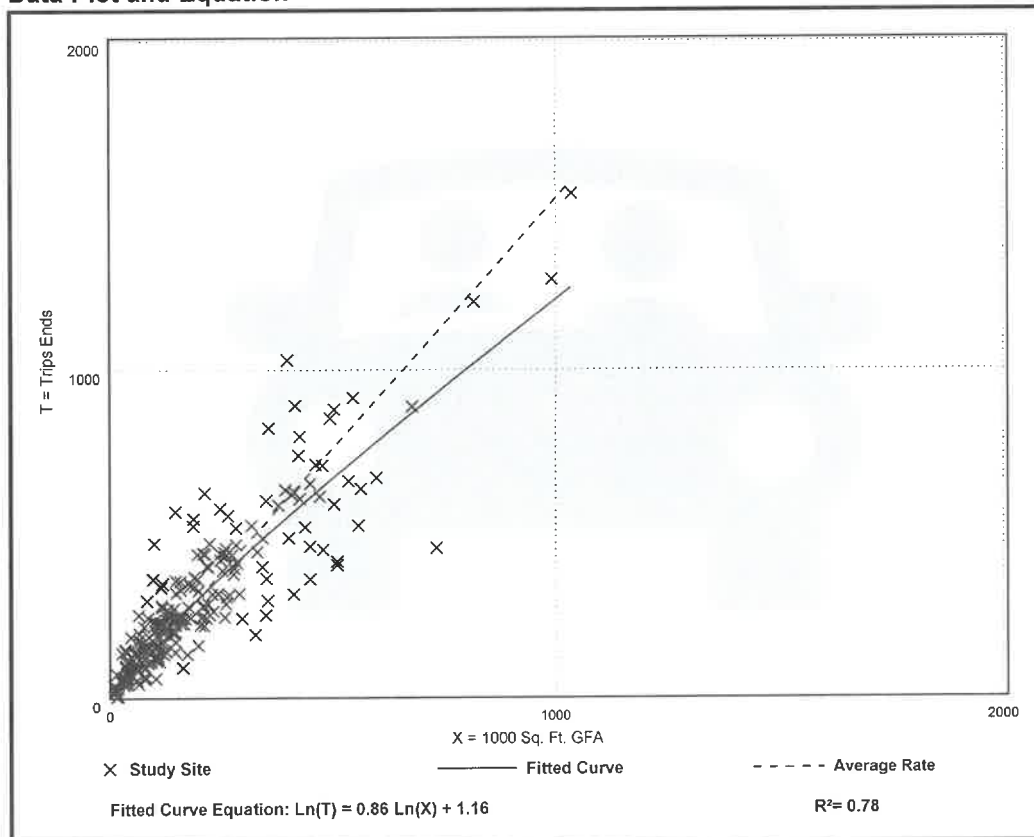
Avg. 1000 Sq. Ft. GFA: 201

Directional Distribution: 88% entering, 12% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.52	0.32 - 4.93	0.58

Data Plot and Equation



General Office Building (710)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 232

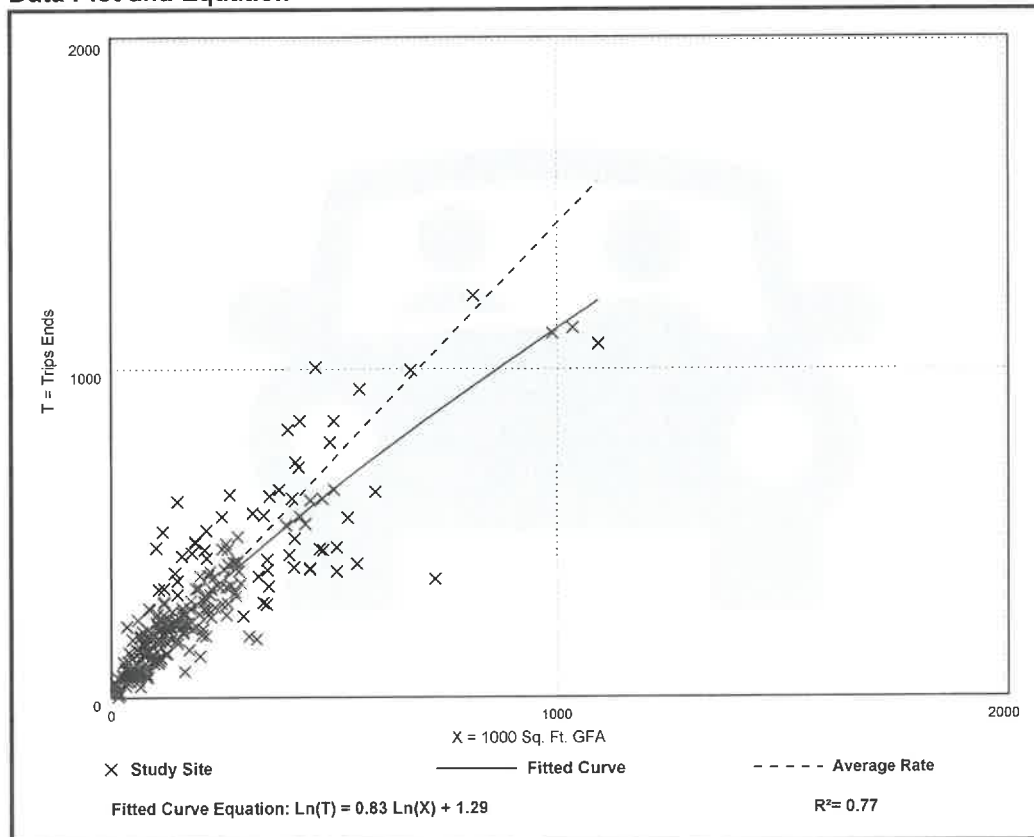
Avg. 1000 Sq. Ft. GFA: 199

Directional Distribution: 17% entering, 83% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.44	0.26 - 6.20	0.60

Data Plot and Equation



Land Use: 720

Medical-Dental Office Building

Description

A medical-dental office building is a facility that provides diagnoses and outpatient care on a routine basis but is unable to provide prolonged in-house medical and surgical care. One or more private physicians or dentists generally operate this type of facility. General office building (Land Use 710) and clinic (Land Use 630) are related uses.

Land Use Subcategory

Analysis of medical-dental office building data found that trip generation rates are measurably different for sites located within or adjacent to a hospital campus and sites that are stand-alone. Data plots are presented for these two land use subcategories.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, Connecticut, Kentucky, Maryland, Minnesota, New Jersey, New York, Ohio, Oregon, Pennsylvania, South Dakota, Texas, Virginia, Washington, and Wisconsin.

Source Numbers

104, 109, 120, 157, 184, 209, 211, 253, 287, 294, 295, 304, 357, 384, 404, 407, 423, 444, 509, 601, 715, 867, 879, 901, 902, 908, 959, 972

Medical-Dental Office Building - Stand-Alone (720)

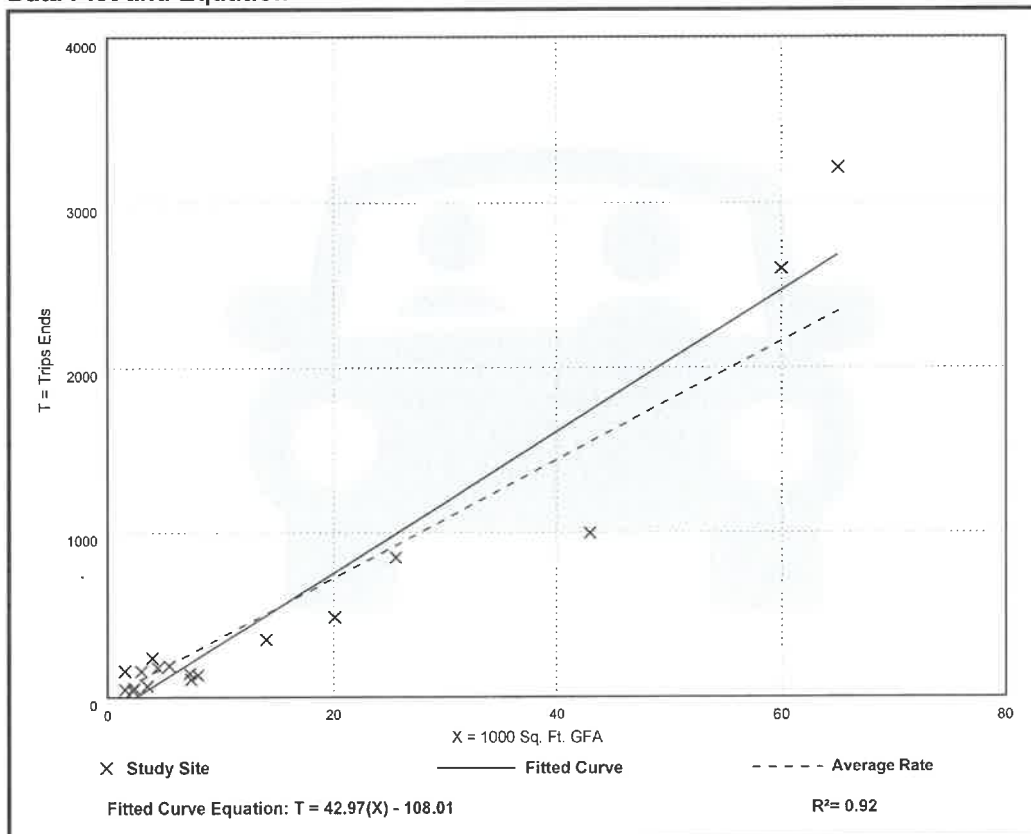
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 18
Avg. 1000 Sq. Ft. GFA: 15
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
36.00	14.52 - 100.75	13.38

Data Plot and Equation



Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 24

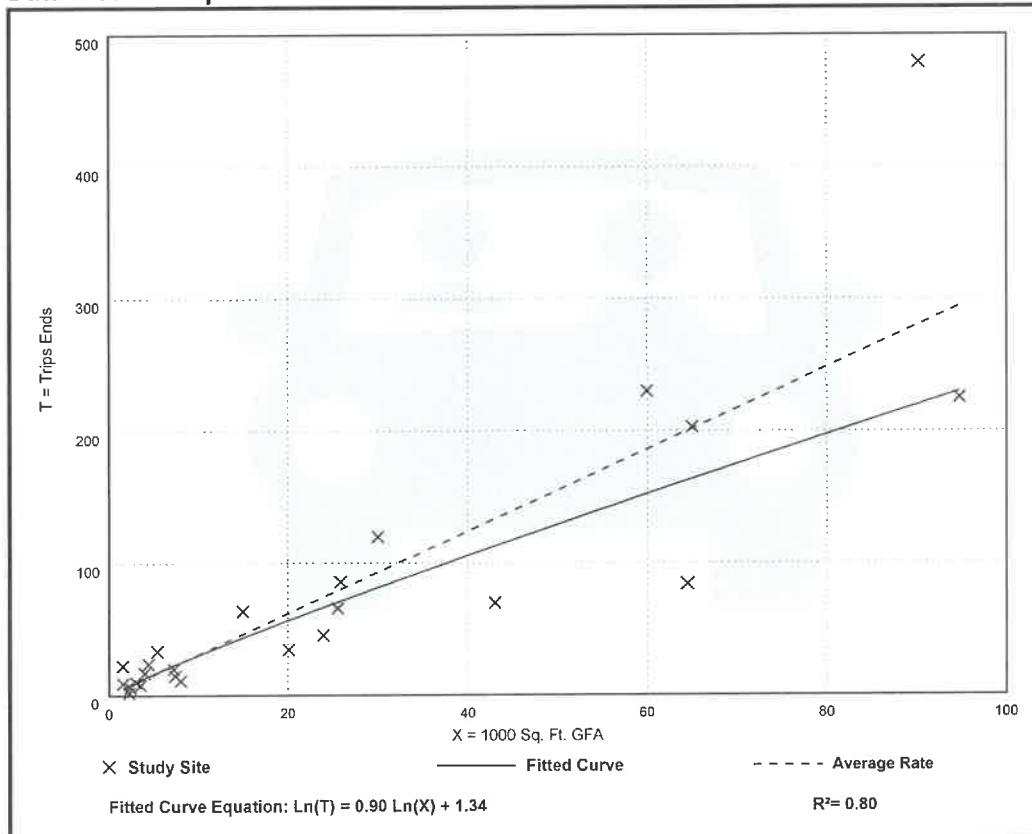
Avg. 1000 Sq. Ft. GFA: 25

Directional Distribution: 79% entering, 21% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
3.10	0.87 - 14.30	1.49

Data Plot and Equation



Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 30

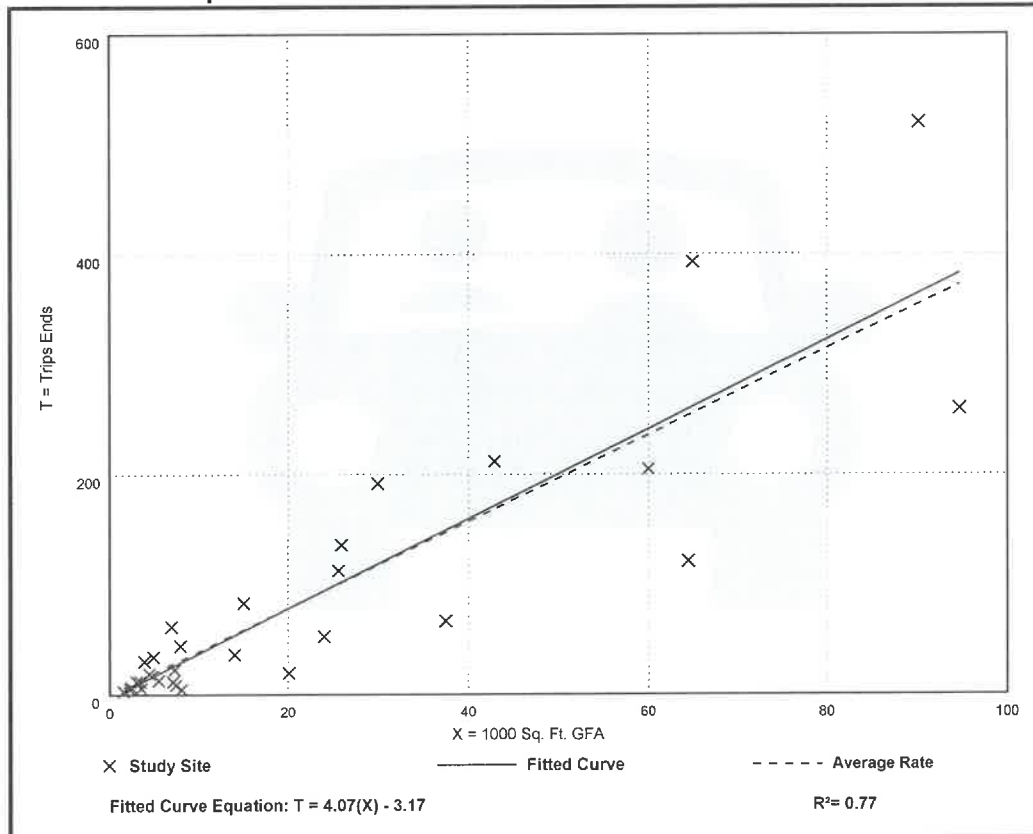
Avg. 1000 Sq. Ft. GFA: 23

Directional Distribution: 30% entering, 70% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
3.93	0.62 - 8.86	1.86

Data Plot and Equation



Land Use: 820

Shopping Center (>150k)

Description

A shopping center is an integrated group of commercial establishments that is planned, developed, owned, and managed as a unit. Each study site in this land use has at least 150,000 square feet of gross leasable area (GLA). It often has more than one anchor store. Various names can be assigned to a shopping center within this size range, depending on its specific size and tenants, such as community center, regional center, superregional center, fashion center, and power center.

A shopping center of this size typically contains more than retail merchandising facilities. Office space, a movie theater, restaurants, a post office, banks, a health club, and recreational facilities are common tenants.

A shopping center of this size can be enclosed or open-air. The vehicle trips generated at a shopping center are based upon the total GLA of the center. In the case of a smaller center without an enclosed mall or peripheral buildings, the GLA is the same as the gross floor area of the building.

The 150,000 square feet GLA threshold value between community/regional shopping center and shopping plaza (Land Use 821) is based on an examination of trip generation data. For a shopping plaza that is smaller than the threshold value, the presence or absence of a supermarket within the plaza has a measurable effect on site trip generation. For a shopping center that is larger than the threshold value, the trips generated by its other major tenants mask any effects of the presence or absence of an on-site supermarket.

Shopping plaza (40-150k) (Land Use 821), strip retail plaza (<40k) (Land Use 822), and factory outlet center (Land Use 823) are related uses.

Additional Data

Many shopping centers—in addition to the integrated unit of shops in one building or enclosed around a mall—include outparcels (peripheral buildings or pads located on the perimeter of the center adjacent to the streets and major access points). These buildings are typically drive-in banks, retail stores, restaurants, or small offices. Although the data herein do not indicate which of the centers studied include peripheral buildings, it can be assumed that some of the data show their effect.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky,



ATTACHMENT A

Maryland, Massachusetts, Michigan, Minnesota, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, and Wisconsin.

Source Numbers

77, 110, 154, 156, 159, 190, 199, 202, 204, 213, 251, 269, 294, 295, 299, 304, 305, 307, 308, 309, 311, 314, 315, 316, 317, 319, 365, 385, 404, 414, 423, 442, 446, 562, 629, 702, 715, 728, 868, 871, 880, 899, 912, 926, 946, 962, 973, 974, 978, 1034, 1040, 1067

Shopping Center (>150k) (820)

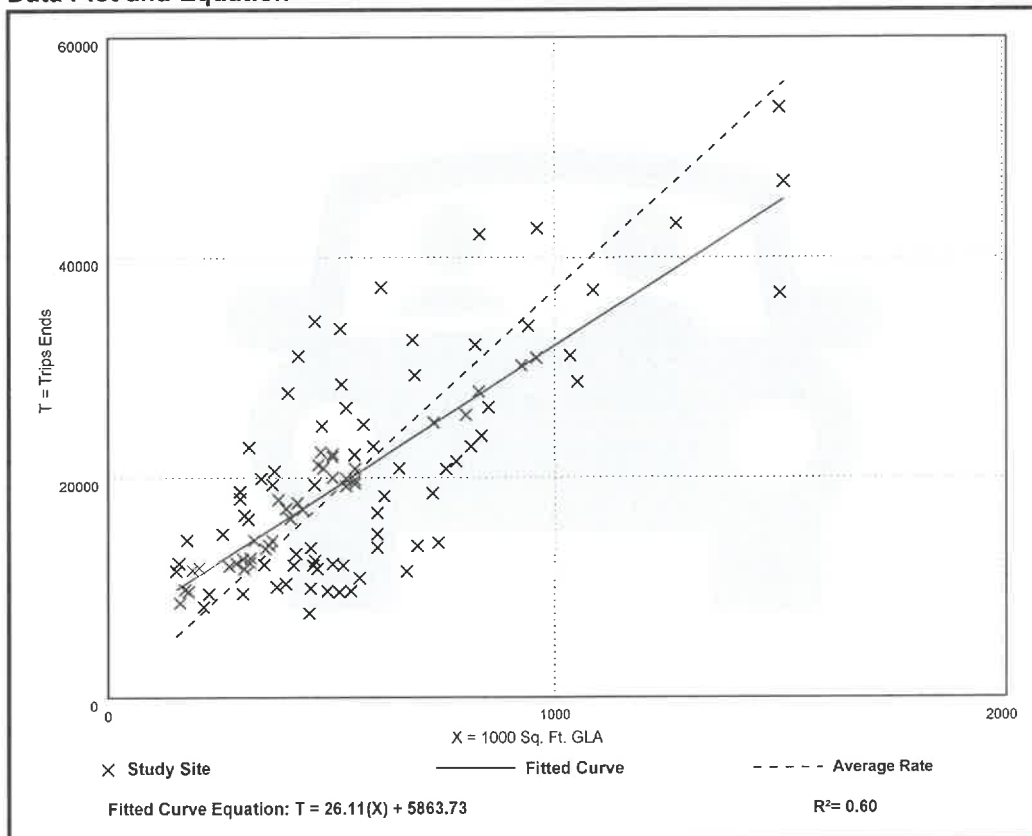
Vehicle Trip Ends vs: 1000 Sq. Ft. GLA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 108
Avg. 1000 Sq. Ft. GLA: 538
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
37.01	17.27 - 81.53	12.79

Data Plot and Equation



Shopping Center (>150k) (820)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 44

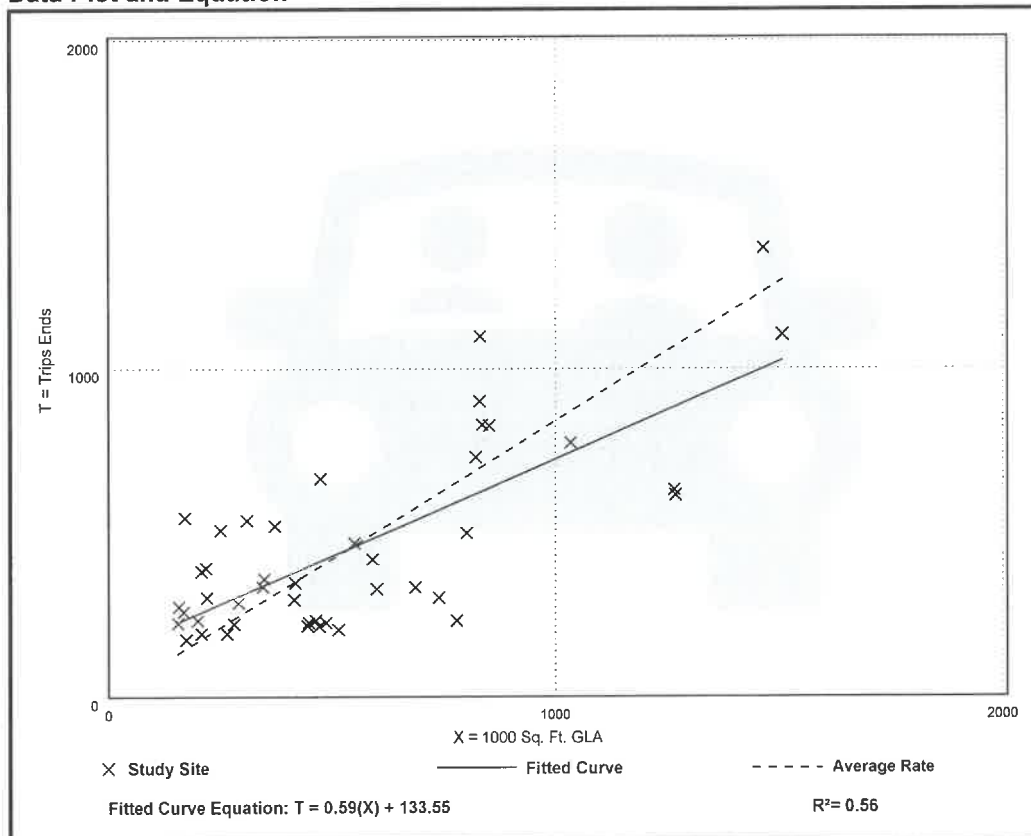
Avg. 1000 Sq. Ft. GLA: 546

Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
0.84	0.30 - 3.11	0.42

Data Plot and Equation



Shopping Center (>150k) (820)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 126

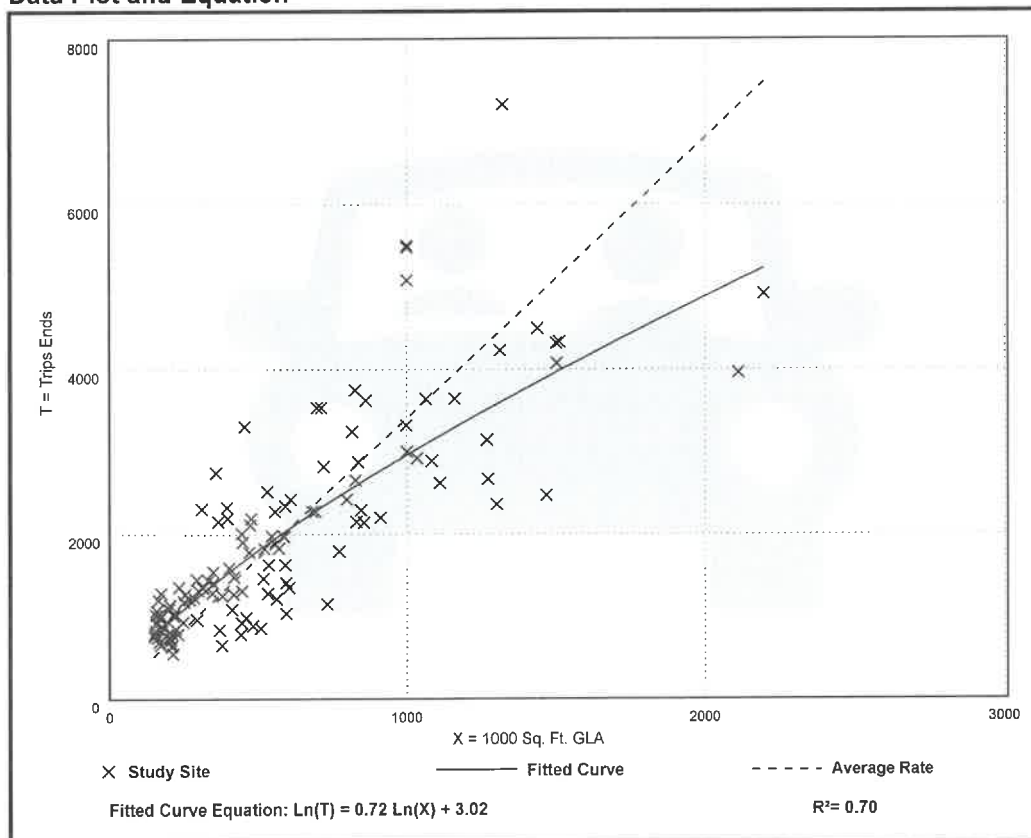
Avg. 1000 Sq. Ft. GLA: 581

Directional Distribution: 48% entering, 52% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
3.40	1.57 - 7.58	1.26

Data Plot and Equation



May 9, 2025

Mark Bennett
Senior Planner
330 W. Church Street
Bartow, FL 33830

Job No: 25201

Project No: LDCPAL-2025-1

Project Name: GPK Holly Hill Groves Rd 2

Mr Bennett,

The following is a written response to comments received on April 23, 2025. The response follows the order of comments provided.

General Comments

1. While not required, it is recommended that the development request a non-binding letter to get an initial indication on the capacity of nearby effected schools. Please visit <https://polkschoolsfl.com/schoolconcurrency> and click on "Concurrency Application & Fee Schedule Form" to apply. If you have any questions, please feel free to email us at planning@polk-fl.net. When this project applies for Level 2 (site plan) approval, this development will need to apply for a binding school capacity determination letter.

Response:

A non-binding school determination letter prepared by Polk County Public Schools is attached for review. See Appedix A.

2. IAS – Access to Roads and Highways:
 1. Vehicle Trips – Please provide a preliminary estimate of daily and PM peak hours vehicle trips, as required by this section.

Response:

The Impact Assessment Statements have been revised to include estimated AM and PM peak hour vehicle trips. See page 26 of this report. A detailed Traffic Impact Assessment is attached for review. See Appendix C.

3. IAS – General Information: 2.a. Parks and Recreation – please provide a narrative explain the demand from the proposed project upon existing parks and recreation services.

Response:

A narrative response has been included. The estimated need for park and recreation spaces will be included on site. See page 32 of this report.



4. Map E: Traffic Circulation – Please provide this map with the required information.

Response:

A Traffic Circulation Map has been included in Exhibit 8.

5. Map G: Drainage Map – Please provide the required map. While it is understood that a detailed Site Plan has not been completed, nor is required for a Plan Amendment, the drainage map should identify existing drainage conditions and features.

Response:

A Drainage Map has been included in Exhibit 9.

6. North Ridge SAP – Open Space: POLICY 2.131-U1 of the North Ridge Selected Area Plan states that Ten percent (10%) of open space (30% for the area within the Green Swamp) shall be required of all development, to ensure an aesthetic and visually pleasing sense of place.

Response:

The subject site is within the Ridge SPA which requires a minimum of 40% open space for developments over 4 Du/Ac as per Ch 5, Sec 504. The report has been revised to reflect this requirement.

7. School Board Application – Please correct the cover page.

Response:

A non-binding school determination letter prepared by Polk County Public Schools is attached for review. See Appendix A.

8. Policy 2.102-A11: Urban Sprawl Criteria – Please provide an analysis / narrative of each item (a. thru m.) listed in this policy.

Response:

The report has been revised to include responses and narratives to each criteria. See page 17 of this report.

9. Application – Please provide a Level 4 Land Development Code / Comprehensive Plan Amendment Application (PD LDC 907).

Response:

A Level 4 Land Development Application has been submitted with the revised report.

To the best of our knowledge all comments have been addressed. If you have any questions or concerns please feel free to contact the office.

Sincerely,



William Maki, RLA
Project Manager
Daly Design Group

Cc: Toby Spill



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