



**SIERRA  
CLUB**

**ANCIENT ISLANDS GROUP**

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March 5, 2024

SCANNED



Planning Commissioners,

The Ancient Islands Group of Florida Sierra offers the following comments on LDCPAL-2023-12.

This is listed as a staff-initiated change in the Polk County Comprehensive Plan to allow increased residential development in the areas of the Green Swamp Area of Critical State Concern classified as COREX and A/RRX.

According to the staff report, this would add 153 new residential lots in the CORE and 1,142 lots in the A/RRX section.

The basis of this proposed change, according to staff, is to accommodate landowners whose properties fall short of the 20-acre and 10-acre thresholds for obtaining building permits in sections that contain less than the standard 640 acres by allowing them to count a portion of the adjacent right of way in calculating their gross density.

Staff argues this would make the rules there consistent with the rules in other development areas elsewhere in Polk County.

The proposal raises some questions that need to be addressed in considering this change.

Does this apply only on frontages of existing county-maintained public local and collector roads, or could it also apply to new private roads that could be built with the intent of opening more areas of the Green Swamp ACSC to more intense development?

Why couldn't landowners simply seek a variance to the density requirement using the existing regulations?

Was this change truly staff-initiated or was it based on landowner requests?

Why did the staff report not include a map depicting where these additional lots would

be located to give everyone a better idea of the impact of this proposed change?

Additionally, we would like to point out a factual error in the staff report.

The Green Swamp Area of Critical State Concern includes only properties in Polk County and Lake County.

Although the hydrologic Green Swamp is a plateau between the Lake Wales Ridge and the Brooksville Ridge, portions of the Green Swamp in Pasco, Sumter and Hernando counties were not included in the critical area designation or the state settlement agreement that established the CORE and other special protection areas.

Therefore, using their regulations in the analysis seems unjustified.

Sincerely,

A handwritten signature in blue ink that reads "Tom Palmer". The signature is fluid and cursive, with a large, stylized initial "P" that loops back over the first name.

Tom Palmer, Chairman  
[tomp47@yahoo.com](mailto:tomp47@yahoo.com)