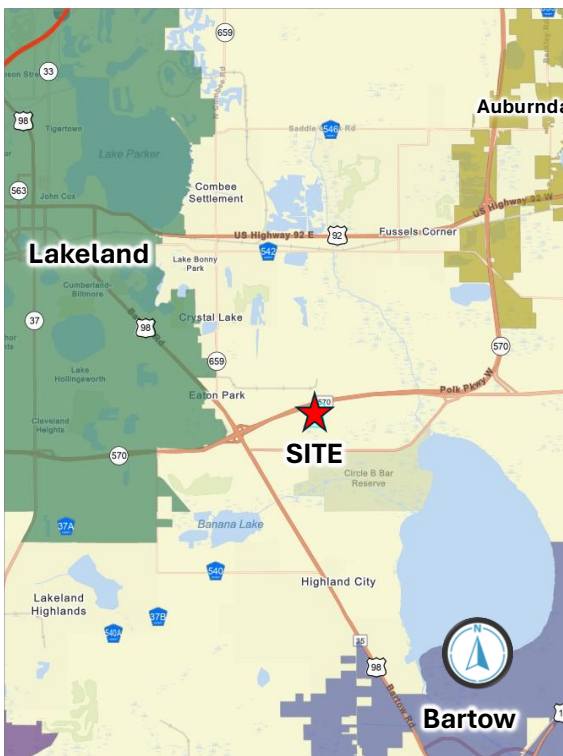


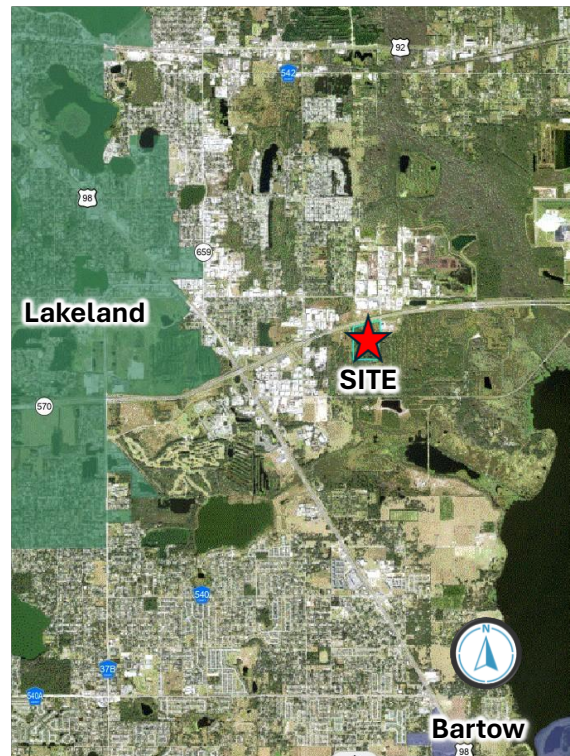
POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

DRC Date: May 28, 2026	Level of Review: Level 4 Review
PC Date: August 5, 2026	Type: Small-Scale Comprehensive Plan Amendment
BoCC Date: September 15, 2026	Case Numbers: LDCPAS-2026-12
Applicant: Zachary Thornton	Case Name: 2925 Pavers Road Industrial Storage Yard
	Case Planner: Tyler Daniels, Planner II

Request:	The applicant is requesting to change 38.22 acres of Rural Development Area (RDA) to Urban Growth Area (UGA).
Location:	2925 Pavers Road, South of SR 570 and East of SR 35
Property Owners:	WHS Visions of Lakeland LLC
Parcel Size (Number):	38.22 acres out of a 58.91 acre (242835000000012030) parent parcel
Future Land Use:	Industrial (IND)
Development Area:	Rural Development Area (RDA)
Nearest Municipalities:	Lakeland
DRC Recommendation:	Pending
Planning Commission Vote:	Pending
Florida Commerce:	N/A



Location Map



Aerial Photo

Summary:

This is an applicant-initiated Small-Scale Comprehensive Plan Map Amendment to change the Development Area designation on ±38.22 acres of a ±58.91 acre parcel from Rural Development Area (RDA) to Urban Growth Area (UGA). The Future Land Use designation of Industrial (IND) is not proposed for change. The site is located at 2925 Pavers Road, south of SR 570 (Polk Parkway) and east of SR 35 (US 98), approximately 1.3 miles east of Bartow Road, near the city

limits of Lakeland. The request changes the base Development Area district while leaving the Future Land Use designation intact.

Compatibility Summary:

The site is bordered on the north by Urban Growth Area across the Polk Parkway right-of-way and on the west by the Transit Supportive Development Area along the Polk Parkway (SR 570) corridor. Existing industrial and warehouse development is established along Pavers Lane immediately north of SR 570, providing a direct urban-industrial reference for the site. The portion of the parcel proposed for the change is contiguous to UGA on the north and to TSDA on the west, satisfying the contiguity requirement of Comprehensive Plan Policy 2.105-A1(b). To the south and east, the surrounding RDA remains undeveloped and is largely vacant. Future industrial development on this site will be subject to Land Development Code Section 220 setbacks and buffering requirements relative to any abutting residential uses or districts.

Infrastructure Summary:

The site fronts Pavers Road and has proximity to SR 570 (Polk Parkway), a limited-access regional arterial. SR 35 (US 98) is located approximately 1.3 miles west. The subject parcel is within the City of Lakeland utility service area. However, the nearest water connection is to the northeast of the site, provided by the Florida Governmental Utility Authority (FGUA), and the applicant has stated in their Impact Assessment Statement that they plan to connect to FGUA. Capacity information has not been provided by the applicant for either the City of Lakeland or FGUA. This must be addressed at Level 2 Review because the UGA requires connection to public water and sewer. Fire response is anticipated from the City of Lakeland Fire Department under interlocal agreement, with ambulance response from Polk County Fire Rescue.

Environmental Summary:

Environmental constraints within the 38.22-acre amendment area consist of approximately 3.70 acres of FEMA Flood Zone A and approximately 5.10 acres of mapped wetlands (across four polygons), with approximately 2.62 acres of overlap between the two features. The combined constrained footprint within the amendment area is approximately 6.18 acres, or roughly 16% of the amendment area, concentrated on the western and northwestern portion. The remaining approximately 32 acres are upland and developable. Additional wetland and Flood Zone A area exists on the broader parent parcel within the existing UGA-Industrial designation but is not part of this amendment. The constrained portion correlates with Hydraquents, clayey, and Arents, 0 to 5 percent water complex soils per the USDA Web Soil Survey, while the developable upland portion is predominantly Neilhurst sand.

Comprehensive Plan

The relevant sections of the Comprehensive Plan applicable to this request are:

- Policy 2.102-A1 through A15: General Growth Management Policies
- Policy 2.102-A10: Location Criteria
- Policy 2.102-A11: Urban Sprawl Criteria
- Section 2.103: Development Areas
- Section 2.105: Urban Growth Areas (UGA)
- Section 2.108: Rural Development Areas (RDA)
- Section 2.119: Industrial (IND) Future Land Use District

Findings of Fact

Request and Legal Status

- This is an applicant-initiated request for a Small-Scale Comprehensive Plan Map Amendment changing the Development Area designation on ±38.22 acres of a ±58.91 acre parcel from Rural Development Area (RDA) to Urban Growth Area (UGA). The Future Land Use designation of Industrial (IND) is not proposed for change.
- The property owner of record is WHS Visions of Lakeland, LLC.
- The parent parcel totals ±58.91 acres, of which ±38.22 acres are the subject of this request.
- The site is located at 2925 Pavers Road, south of SR 570 (Polk Parkway) and east of SR 35 (US 98), approximately 1.3 miles east of Bartow Road.
- The site's existing Future Land Use is Industrial (IND), which is a permitted Future Land Use category in both Urban Growth Areas (Policy 2.105-A3) and Rural Development Areas (Policy 2.108).
- Pursuant to Policy 2.103-A2, Development Areas are base districts and are not land uses. The proposed amendment does not alter the Future Land Use, only the underlying base district.
- If approved, the future Land Development Code zoning subdistrict for the site will be Industrial within the UGA.

Compatibility

- The existing uses in the sites of the surrounding area are:
 - North – IND in the UGA across SR 570 (Polk Parkway) right-of-way; further Industrial and warehouse uses along Pavers Lane
 - West – IND in UGA development is directly adjacent to the proposed area directly next to the TSDA to the Northwest and Southwest; existing industrial and warehouse uses, with mining/vacant land further west
 - East – ARR in the RDA development area; vacant, undeveloped
 - South – ARR in the RDA development area; vacant, undeveloped
- The site is contiguous to Urban Growth Area on the north across the Polk Parkway (SR 570) right-of-way and to Transit Supportive Development Area on the west along the Polk Parkway (SR 570) corridor.
- Existing industrial and warehouse development is established along Pavers Lane immediately north of SR 570 within the existing UGA. Surrounding Future Land Use designations include UGA-Industrial to the north, TSDA-Industrial to the west, and RDA with low density residential uses to the south and east.
- The City of Lakeland corporate limits are in close proximity to the subject site.
- Land Development Code Section 220 Compatibility Standards will apply to any abutting residential development or districts at the time of Level 2 Review.
- The proposed Urban Growth Area and Transit Supportive Development Area have a maximum Floor Area Ratio is 0.75 and Impervious Surface Ratio is 0.70. The RDA standards are 0.50 FAR and 0.50 ISR.

Environmental

- The 38.22-acre amendment area contains approximately 3.70 acres of FEMA Flood Zone A and approximately 5.10 acres of mapped wetlands (in four polygons), with approximately 2.62 acres of overlap between the two features.
- The combined constrained footprint within the amendment area is approximately 6.18 acres, or roughly 16% of the amendment area, concentrated on the western and northwestern portion.
- Additional Flood Zone A and wetland area exists on the broader parent parcel within the existing UGA-Industrial designation.
- Mapped constraints are from Polk County Geographical Information System data, the National Wetlands Inventory, and FEMA Flood Insurance Rate Maps.
- The site is located within the Potential Network Connections area of the Polk Green District Comprehensive Plan Map Series.
- There are no conservation easements on the subject site. The nearest conservation easement is located approximately 0.77 miles to the south, on Winter Lake Road (Parcel 24-29-02-000000-011020), recorded as O.R. 8802-0310.
- Per the USDA Web Soil Survey, the amendment area is roughly 80.6 percent Neilhurst sand, rated Not Limited for small commercial buildings; the remaining Arents complex and Hydraquents clayey soils are rated Very Limited and correspond to the wetland and floodplain area on the western and northwestern portion.
- The applicant did not indicate any wells on the parcel, and the site is not within a Wellfield Protection District; the nearest Wellfield Protection District is approximately 3.3 miles south.
- Per the Polk County Protected Species Observation Map and the Florida Fish and Wildlife Conservation Commission, the site falls within an Eagle's Nest protected species area, though the nearest nest is approximately 4,000 feet away and was reported destroyed as of 2025 by the National Audubon Society.
- There are no known historical or archaeological resources on the site per the Florida Master Site File, Florida Department of State, Division of Historical Resources.

Comprehensive Plan Policies

- POLICY 2.102-A1: DEVELOPMENT LOCATION — Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.
- POLICY 2.102-A2: COMPATIBILITY — Land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; c. uses are transitioned through a gradual

scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.

- **POLICY 2.102-A3: DISTRIBUTION** — Development shall be distributed throughout the County consistently with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized; and compact, high-density and intensity development is located where urban services can be made available.
- **POLICY 2.102-A4: TIMING** — The development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services which, at a minimum, shall require compliance with the Plan's Level of Service requirements and the County's concurrency management system.
- **POLICY 2.102-A10: LOCATION CRITERIA** — The following factors shall be taken into consideration when determining the appropriateness of establishing or expanding any land use or development area:
 - a. nearness to incompatible land uses and future land uses, unless adequate buffering is provided;
 - b. nearness to agriculture-production areas;
 - c. distance from populated areas;
 - d. economic issues, such as minimum population support and market-area radius (where applicable);
 - e. adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development, including, but not limited to: transportation facilities; sanitary sewer and potable water service; stormwater management; solid waste collection and disposal; fire protection; emergency medical service; law enforcement; schools and other educational facilities; parks, open spaces, civic areas and other community facilities;
 - f. environmental factors, including, but not limited to: environmental sensitivity of the property and adjacent property; surface water features; wetlands and primary aquifer recharge areas; soil characteristics; location of potable water supplies, private wells, public well fields; and climatic conditions.
- **POLICY 2.102-A15: ADEQUATE PUBLIC FACILITIES** — The County will direct new growth to areas where adequate public facilities exist or are planned; and ensure that essential services are in place to provide for efficient, cost-effective response times from the Fire Department, Sheriff's Department, and Emergency Management Service.
- **POLICY 2.103-A1: AREAS ESTABLISHED AND MAPPED** — The following development areas shall be designated and mapped on the Polk County Future Land Use Map Series as base districts in accordance with the criteria established within Sections 2.104 through 2.108: Transit Supportive Development Area (TSDA); Urban-Growth Areas (UGA); Suburban-Development Areas (SDA); Utility-Enclave Areas (UEA); Rural-Development Areas (RDA).
- **POLICY 2.103-A2: BASE DISTRICTS** — Development Areas are not land uses. They are base districts and serve as a foundation on which land use districts are placed.
- **POLICY 2.105-A1: DESCRIPTION** — Urban-Growth Areas shall:

- a. complement the TSDA in guiding growth, while promoting orderly and compact development;
 - b. be located contiguous to the TSDAs or a municipality as they represent the expansion areas;**
 - c. be supported by existing or planned urban type services that are programmed for the 20-year planning horizon;
 - d. be those areas where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed use development in close proximity to the development in the adjacent TSDAs;
 - e. include development criteria that promote walkable communities, improve access to employment and other opportunities, support the preservation of open space and natural areas, and reduce capital and operating cost for the provision of infrastructure and public services.
- **POLICY 2.105-A3: LAND USE CATEGORIES** — The following land use categories shall be permitted within UGAs in accordance with applicable criteria:
 - a. **ACTIVITY CENTERS:** Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, Employment Centers, and High-Impact Commercial Centers;
 - b. **RESIDENTIAL:** Residential-High, Residential-Medium, and Residential-Low Districts;
 - c. **OTHER:** Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Professional Institutional, Office Centers, Leisure/Recreation, Institutional, Recreation and Open Space, Preservation.
 - **POLICY 2.105-A5: DEVELOPMENT CRITERIA FOR URBAN GROWTH AREAS** — Development within the Urban Growth Areas shall conform to the following criteria as further specified in the Land Development Code: connect to centralized potable water; connect to centralized sanitary sewer systems if available; incorporate design features that promote healthy communities and green building practices; promote the implementation of Complete Street and Conservation Development principles; promote the integration of pedestrian-oriented features; provide access to civic space, parks, green areas, and open space and other amenities; be supported by public safety; have access to public schools; provide connectivity with adjacent uses; encourage the inclusion of a variety of housing choices and mixed uses; and apply additional standards supporting transit if development is within the Corridor and Center Overlay.

Development Review Committee Recommendation Based on the information provided by the applicant, recent site visits, and the analysis conducted within this staff report, the DRC finds that with the proposed conditions, the proposed requests **ARE COMPATIBLE** with the surrounding land uses and general character of the area, **IS CONSISTENT** with the Polk County Comprehensive Plan and Land Development Code, and therefore, the DRC recommends **APPROVAL of LDCPAS-2026-12**.

Planning Commission Decision: On August 5, 2026, in an advertised public hearing, the Planning Commission voted ?? to recommend APPROVAL or DENIAL of LDCPAS-2026-12.

NOTE: This staff report was prepared without the benefit of testimony or evidence that may be presented at the public hearing. Staff reserves the right to supplement or amend the findings and recommendation contained herein based upon information presented at the hearing.

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

Analysis

This section of the staff report includes data on the surrounding uses, infrastructure conditions, environmental conditions, and related Comprehensive Plan policies and Land Development Code regulations.

Surrounding Uses

Table 1 lists the Development Area designations, Future Land Use designations, and existing uses immediately adjacent to the subject site.

Table 1

Northwest IND; TSDA Existing industrial / warehouse uses along Craftsman Blvd	North IND; UGA (across Polk Parkway / SR 570)Industrial / warehouse uses, Pavers Lane corridor	Northeast IND; UGA Industrial and residential mix south of SR 570 ROW
West IND; TSDA / UGA Mining operation, vacant land	Subject Site Rural Development Area (RDA) Industrial (IND) Vacant / undeveloped ±58.91 acre parcel; ±38.22 acres subject to this request	East ARR; RDA Vacant, undeveloped land
Southwest ARR; RDA Mining / vacant land	South ARR; RDA Vacant, undeveloped, scattered rural residential	Southeast ARR; RDA Vacant, undeveloped

Source: Polk County Geographical Information System and site visit by County staff.

Compatibility with the Surrounding Uses

The Comprehensive Plan defines compatibility as "a condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition." Compatibility analysis for this request differs from a typical Future Land Use change because the FLU is not changing. The compatibility question for a Development Area amendment is whether the intensity envelope of the proposed base district fits the established pattern of urban form surrounding the site.

Land Uses

The Industrial Future Land Use already in place on the site has existed independent of the surrounding RDA character. The site is bordered by UGA-Industrial on the north and TSDA and UGA Industrial on the west, with existing industrial and warehouse buildings established along Pavers Lane north of SR 570. The proposed UGA base district aligns the site with this existing industrial pattern rather than introducing it. The southern and eastern edges of the site abut RDA, where development pressure remains low and where Land Development Code Section 220 setbacks and buffering requirements will apply at the time of site development.

The requested Development Area change does not alter the Industrial (IND) Future Land Use designation, but it does raise the maximum development intensity permitted by right. Under Table 2.2 of the Land Development Code, the dimensional standards for the Industrial district vary by Development Area. Within the Rural Development Area (RDA), Industrial development is limited to a maximum Floor Area Ratio (FAR) of 0.50 and a maximum non-residential Impervious Surface Ratio (ISR) of 0.50. Within the Urban Growth Area (UGA), the same Industrial district permits a maximum FAR of 0.75 and a maximum ISR of 0.70. The abutting Transit Supportive Development Area (TSDA) to the west carries these same urban-level standards.

Applied to the ±38.22-acre amendment area (±1,664,863 square feet of gross land area), the change in Development Area increases the maximum permitted building floor area from approximately 832,432 square feet under the RDA standard to approximately 1,248,647 square feet under the UGA standard, an increase of approximately 416,216 square feet. The maximum permitted impervious surface increases from approximately 50 percent to approximately 70 percent of the site. The proposed intensity is consistent with the Industrial standards already applied to the abutting UGA and TSDA lands to the north and west, and the amendment brings the by-right intensity of the subject site into alignment with the surrounding urban-designated industrial context.

Infrastructure

The site is positioned within an established industrial corridor along the south side of SR 570. Pavers Road provides direct site access and connects to the broader arterial network. The subject parcel is within the City of Lakeland utility service area; however, the nearest water connection is to the northeast, provided by the Florida Governmental Utility Authority (FGUA), and the applicant has stated an intent to connect to FGUA. Because the UGA requires connection to public water and sewer, service and capacity will be confirmed at Level 2 Review. Fire response under interlocal agreement and ambulance response from Polk County Fire Rescue provide adequate emergency service coverage. The proposed industrial use generates no students, so school capacity is not a concern.

Environment

The amendment area contains approximately 6.18 acres of combined wetland and FEMA Flood Zone A constraints (5.10 acres of wetlands, 3.70 acres of Flood Zone A, 2.62 acres of overlap) concentrated on its western and northwestern portion. The remaining approximately 32 acres are upland and suitable for industrial development. The constrained portion is well-defined, concentrated, and avoidable through site design. Stormwater management, wetland avoidance, and floodplain compliance will be addressed at the time of Level 2 Review. Any unavoidable wetland impacts will require coordination with the Southwest Florida Water Management District through the Environmental Resource Permit process, and any floodplain encroachment will be subject to FEMA and County floodplain regulations.

Infrastructure and Urban Services Summary

The proposed CPA is not anticipated to degrade the adopted Level of Service (LOS) standards for transportation, locally zoned schools, or fire, EMS, and Sheriff public safety resources. The subject site is located within Transportation Impact Fee Zone B (Northwest). Potable water and wastewater service, provider, and capacity are addressed under the Service Provider analysis below and must be confirmed at Level 2 Review, as the UGA requires connection to public water and sewer. The applicant did not indicate any wells on the subject site, and the parcel is not within a wellhead protection area.

Nearest Elementary, Middle, and High School

Industrial uses do not generate students. The zoned schools for the subject site are identified below for reference. Final concurrency is determined at Level 2 Review.

Table 2

Name of School	Annual Estimated Demand	Average driving distance from subject site
OSCAR J POPE ELEMENTARY	0 students	+/- 1.8 MI
CRYSTAL LAKE MIDDLE	0 students	+/- 2.5 MI
GEORGE C JENKINS	0 students	+/- 3.8 MI

Source: Polk County School Board, Polk County Impact Fee Ordinance, and County GIS.

Nearest Sheriff, Fire, and EMS Station:

The nearest Sheriff District office is located approximately 9.2 miles from the subject site. Response times vary depending on where the nearest sheriff's deputy patrol car is located rather than the district office. The nearest Fire/EMS station is approximately 2.1 miles from the subject site.

Table 3: Public Safety

	Name of Station	Distance/Response Time*
Sheriff	Southwest District Command (4120 US 98 South, Lakeland)	Priority 1 – 8:28 min Priority 2 – 23:04 min
Fire/EMS	Polk County Fire Rescue Station 35 3409 Winter Lake Rd, Lakeland	2.1 ± miles / 8-10 min

Water and Sewer Capacity and Service Provider:

Table 4 below details the estimated impact to potable water and wastewater services based upon the capacity on the subject site under the proposed designation change.

A. Available Capacity:

Table 4: Estimated Water and Sewer Impact Analysis

Permitted Density / Intensity	Maximum Permitted in Existing RDA (Industrial)	Maximum Permitted in Proposed UGA (industrial)
38.22± acres Gross ~32± acres Upland	38.22 acres x 0.50 FAR = 832,432 sf	38.22± acres (1,664,863 sf) x 0.75 FAR = 1,248,647 sf
Potable Water Consumption	832,432 sf X .24 = 199,784 GPD	1,248,647 sf X 0.24 = 299,675 GPD
Wastewater Generation	199,784 GPD X 80% = 159,827 GPD	299,675 GPD X 80% = 239,740 GPD

B. Service Provider:

The subject parcel for the land use change is within the City of Lakeland Utility Service area. However, the nearest water connection is to the northeast of the site provided by Florida Governmental Utility Authority (FGUA). In addition, the applicant has stated in their Impact Assessment Statement that they plan to connect to FGUA. Capacity information has not been provided by the applicant for either the City of Lakeland or FGUA. This will have to be addressed at the Level 2 Review because the UGA requires connection to public water and sewer.

Roadways/Transportation Network:

A. Estimated Demand:

Table 5 following this paragraph shows the Average Annual Daily Trip (AADT) rate and the PM Peak hour trip rate. The proposed Development Area designation change to Urban Growth Area, at maximum density, will generate more than the current combination of the Rural Development Area

Table 5: Estimated Transportation Impact Analysis

Permitted Density / Intensity	Maximum Permitted in Existing Land Use RDA	Maximum Permitted in Proposed UGA
38.22 ± acres Gross ~32± acres Upland	38.22±acres X 0.50 FAR = 832,432 sf	38.22± acres (1,664,863 sf) X 0.75 FAR = 1,248,647 sf
Average Annual Daily Trips (AADT)	832,432 / 1,000 X 6.97 X 92% = 5,338 Trips	1,248,647 / 1,000 X 6.97 X 92% = 8,007 Trips
PM Peak Hour Trips	832,432 / 1,000 X .91 X 92% = 697 Trips	1,248,647 / 1,000 X .91 X 92% = 1,045 Trips

Source: Concurrency Manual

B. Available Capacity: The subject site takes access from Pavers Lane and loads onto the regional network at SR 570 (Polk Parkway). According to the 2026 Polk Transportation Planning Organization Roadway Network Database, the segment of SR 570 (Polk Parkway) between US 98 and CR 546 (Old Dixie Highway) is a four-lane limited-access expressway carrying 21,100 Annual Average Daily Trips against an adopted directional capacity of 3,890 peak-hour trips, operating at

Level of Service (LOS) B. The segment is not projected to be deficient within the five-year planning horizon. Final concurrency will be determined at the time of Level 2 Review.

C. Roadway Conditions: SR 570 (Polk Parkway) is a four-lane, limited-access expressway maintained by the Florida Department of Transportation and is in good condition. Pavers Lane is a private road (Unit P843503) extending approximately 1,282 feet from Ridgeway Lane to Maine Avenue and providing direct access to the subject site. Any improvements to Pavers Lane necessary to serve the proposed intensity, including cross-access and connection to the public network, will be addressed at the time of Level 2 Review.

Environmental Conditions:

Any impact to surface water, wetlands, and storm water management will be in accordance with the requirements of the Comprehensive Plan and Land Development Code.

A. Surface Water:

There are observable surface waters on the subject site within the floodplain area reaching an elevation low of 113 feet in a roughly 49,000 square foot area in the midwestern portion of the property. Other low areas can be attributed to previous phosphate mining in the area. The site's higher ground lies along its northern and eastern portions, where elevations reach approximately 120 to 123 feet, and the terrain slopes gradually to the west and southwest toward the surface water and floodplain. Overall relief across the parcel is roughly 10 to 12 feet, indicating a gentle grade with no significant topographic breaks apart from the mined and floodplain low areas.

B. Wetlands/Floodplains:

According to the Polk County Data Viewer, wetland provided by the FDEP wetland viewer indicates wetlands are on the subject site. A wetland determination will be needed for final uplands of the subject site. For this analysis it is estimated that of the 38.22± acre site, approximately 5.10 acres are wetland.

C. On-Site Soils:

The subject site is comprised of primarily Neilhurst sand, which makes up approximately 80.6% of the site, and Arents, 0 to 5 percent water complex, which makes up approximately 14.2% of the site, with less than 1 percent Hydraquents, clayey. The remaining 4.6% is Water. According to the USDA Web Soil Survey, Neilhurst sand is rated as "Not Limited" for small commercial buildings and "Slightly Limited" for septic tank absorption fields, while Arents, 0 to 5 percent water complex, is rated as "Very Limited" for small commercial buildings and is not rated for septic tank absorption fields. Future development of the site will be subject to Section 2.303: "Soils" of the County's Comprehensive Plan (in conjunction with the Land Development Code) which requires all development to implement Best Management Practices based on the Department of Environmental Protection's (DEP) Florida Development Manual. The reported soils are based on the United States Department of Agriculture (USDA) Soils Survey.

Table 6

SOIL NAME	SMALL COMMERCIAL BUILDINGS	SEPTIC TANK ABSORPTION FIELDS	PERCENTAGE OF SITE
Neillhurst sand	Not Limited	Slightly Limited	80.6+/-%
Arents, 0 to 5 percent water complex	Very Limited	Not Rated	14.2+/-%
Hydraquents, clayey	Very Limited	Not Rated	.7+/-%
Water			4.6+/-%
Source: USDA Web Soil Survey			

D. Wells (Public/Private):

The applicant did not indicate any wells located on the parcel. The parcel is not within a Wellfield Protection District; however, the nearest Wellfield Protection District is approximately 3.3 miles South of the site.

E. Protected Species

According to Polk County Protected Species Observation Map and the Florida Fish & Wildlife Conservation Commission (2015), the subject site is located within the Eagle's Nest protected species area. However, the nearest reported nest location is approximately 4,000 feet away and was reported as destroyed as of 2025 by The National Audubon Society.

F: Polk Green Districts and Conservation Easements:

The site is located within the Potential Network Connections area of the Polk Green District Comprehensive Plan Map Series. There are no conservation easements on the subject site. The nearest conservation easement is located approximately 0.77 miles to the south, on Winter Lake Road (Parcel 24-29-02-000000-011020), recorded as O.R. 8802-0310.

G. Florida Wildlife Corridor

The site is not located within the Florida Wildlife Corridor.

H. Archeological Resources

There are no known historical or archeological resources onsite according to the Secretary of the State's Department of Historical Resources Florida Master File.

I. Airports:

The subject site is not located within an Airport Impact District (AID) or the Airport Height Notification Zone.

Park Facilities:

The nearest park is the Eaton Park. The closest environmental site is the Circle B Bar Reserve.

A. Location:

Eaton Park is located at 2730 Maine Avenue

B. Services:

The park's current hours of operation are from dawn to dusk (generally 6 a.m. to 10 p.m.) and features a basketball court and a playground.

C. Multiuse Trails:

The closest multi-use trail is Fort Fraser Trail about 2.6 miles away. It is a multi-use 7.75-mile trail runs parallel to U.S. Highway 98 between State Road 540/Winter Lake Road in Lakeland and State Road 60 in Bartow, with trailheads at Polk State College in Lakeland and in Highland City. The Highland City trailhead on 4th Street SE between Central Avenue and Laurel Avenue includes parking, restrooms and other amenities. Runners, walkers and cyclists on this trail travel through tree canopies, pastures and populated areas. In total, there are five picnic shelters, six rest shelters and three trestle bridges.

D. Environmental Lands:

The closest publicly accessible environmental lands are within Circle B Bar Reserve. Circle B Bar Reserve, on the northwest shore of Lake Hancock, is a former cattle ranch that today boasts a wide variety of plants and animals. You can see several distinct ecosystems in this reserve of 1,267 acres. There is wildlife sightings from Lake Hancock, often considered the headwaters of the Peace River, which flows more than 100 miles from Polk County southwest to the Gulf of Mexico. Circle B Bar Reserve is a nearly 1,300-acre county nature reserve located along Lake Hancock in Lakeland. The site offers approximately six miles of hard-packed, marked trails suitable for hiking, biking, and wildlife observation, with the Alligator Alley Trail being among the most frequented. The reserve supports diverse ecosystems, including oak hammock, freshwater marsh, hardwood swamp, and lake shoreline, and is recognized as a notable location for viewing native wildlife such as alligators, wading birds, waterfowl, ospreys, and bald eagles. On-site amenities include the Polk Nature Discovery Center, an educational facility with interactive exhibits and an indoor children's play area, as well as periodic guided tram tours. The reserve is staffed by volunteers who provide trail maps and visitor information.

E. Planned Improvements:

There are no further recreation improvements scheduled for this area of Polk County at this time.

Consistency with the Comprehensive Plan

The most relevant policies for the proposed request are summarized in Table 8, with the consistency analysis provided alongside each policy.

Table 8

Comprehensive Plan Policy	Consistency Analysis
POLICY 2.102-A1: DEVELOPMENT LOCATION — Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.	The subject site is bordered to the north by UGA across the Polk Parkway right-of-way and to the west by UGA and TSDA along the Polk Parkway (SR 570) corridor. Existing industrial and warehouse development is established along Pavers Lane immediately north of SR 570. Designating the site UGA continues the existing urban industrial form rather than leapfrogging development further into rural areas, satisfying the contiguous and compact growth pattern this policy requires.
POLICY 2.102-A2: COMPATIBILITY — Land shall be developed so that adjacent uses are compatible with each other.	The Industrial Future Land Use already in place on the site signals an intent for urban-intensity industrial use. Adjacent uses to the north and west are industrial, warehouse, and mining. The proposed change does not introduce a new use type into a sensitive context. Land Development Code Section 220 setbacks and buffers will apply to any abutting residential uses along the southern boundary at the time of development review.
POLICY 2.102-A3: DISTRIBUTION — Development shall be distributed throughout the County consistently	The site has direct access to Pavers Road, with frontage proximate to SR 570 (Polk Parkway), a limited-access

with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized.	regional arterial, and SR 35 / US 98 to the east. Industrial development on this site uses existing arterial infrastructure rather than driving new infrastructure into rural areas.
POLICY 2.102-A4: TIMING — The development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services.	Final concurrency is determined at Level 2 Review. The roadway, water, and wastewater networks serving the immediate area are already extended to support the existing industrial uses along Pavers Lane to the north. Bringing this site into UGA is consistent with the timing of investments already made in the surrounding industrial corridor.
POLICY 2.102-A10: LOCATION CRITERIA — Factors to consider when establishing or expanding any land use or development area, including buffering, support facilities, and environmental factors.	Adequate buffering from any nearby residential uses will be required at site development. Support facilities including transportation, water, wastewater, fire, EMS, and law enforcement are addressed in the Analysis section of this report. Environmental factors include approximately 6.18 acres (16%) of mapped wetlands and FEMA Flood Zone A concentrated on the western and northwestern portion of the amendment area; the constrained portion is avoidable through site design, and the remaining approximately 32 acres are developable upland.
POLICY 2.102-A15: ADEQUATE PUBLIC FACILITIES — The County will direct new growth to areas where adequate public facilities exist or are planned.	The site is within the service envelope of the existing industrial corridor along Pavers Lane and the SR 570 / SR 35 interchange. Public facilities serving that corridor are programmed within the 20-year planning horizon, consistent with the UGA designation criteria in Policy 2.105-A1.
POLICY 2.105-A1: DESCRIPTION — Urban-Growth Areas shall (a) complement the TSDA in guiding growth, while promoting orderly and compact development; (b) be located contiguous to the TSDAs or a municipality as they represent the expansion areas; (c) be supported by existing or planned urban type services that are programmed for the 20-year planning horizon; (d) be those areas where the availability of infrastructure and other community facilities and services promotes and supports the location of higher density and intensity compact, mixed use development in close proximity to the development in the adjacent TSDAs; (e) include development criteria that promote walkable communities, improve access to employment, support open space preservation, and reduce capital and operating cost for infrastructure.	The request satisfies each criterion of Policy 2.105-A1. The site is contiguous to UGA across the Polk Parkway right-of-way to the north and to TSDA and UGA on the west along the Polk Parkway (SR 570) corridor. The City of Lakeland's corporate limits are within close proximity. Urban services serving the existing industrial corridor along Pavers Lane are programmed within the 20-year horizon. The site complements the surrounding TSDA and UGA pattern by extending the urban industrial form rather than dispersing it. Walkability is limited by the industrial use type, but pedestrian access for employees will be addressed at the time of Level 2 Review.
POLICY 2.105-A3: LAND USE CATEGORIES — UGAs permit Activity Centers, Residential Districts, Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Professional Institutional, Office Centers, Leisure/Recreation, Institutional, Recreation and Open Space, and Preservation.	Industrial is an expressly permitted Future Land Use category within the UGA. The existing IND designation on this site is consistent with the proposed UGA base district and would resolve the current mismatch between an urban-intensity Future Land Use and a Rural-Development base district.
POLICY 2.105-A5: DEVELOPMENT CRITERIA FOR URBAN GROWTH AREAS — Development within UGAs shall connect to centralized potable water; connect to centralized sanitary sewer if available; incorporate design features promoting healthy communities and green building; integrate pedestrian features; provide access to civic space; be supported by public safety; have access to public schools; provide connectivity with	Subject to Level 2 Review, future development on the site will be required to connect to centralized potable water and sanitary sewer where available. Pedestrian-oriented features and public-safety considerations will be addressed at the site planning stage. School access is not a constraint because the proposed industrial use generates no students.

adjacent uses; and encourage a variety of housing choices and mixed uses.	
POLICY 2.108 (RURAL DEVELOPMENT AREAS) — RDAs are intended to remain in rural and agricultural use with low-density residential, consistent with the Comprehensive Plan's multi-nodal, urban-cluster framework.	The site's existing Industrial Future Land Use is inconsistent with the rural and agricultural character that the RDA is intended to preserve. Removing this 38.22-acre tract from the RDA actually strengthens the rural designation surrounding it by removing a non-conforming intensive use category from the base district and placing it where it belongs, in the UGA.

Urban Sprawl Analysis

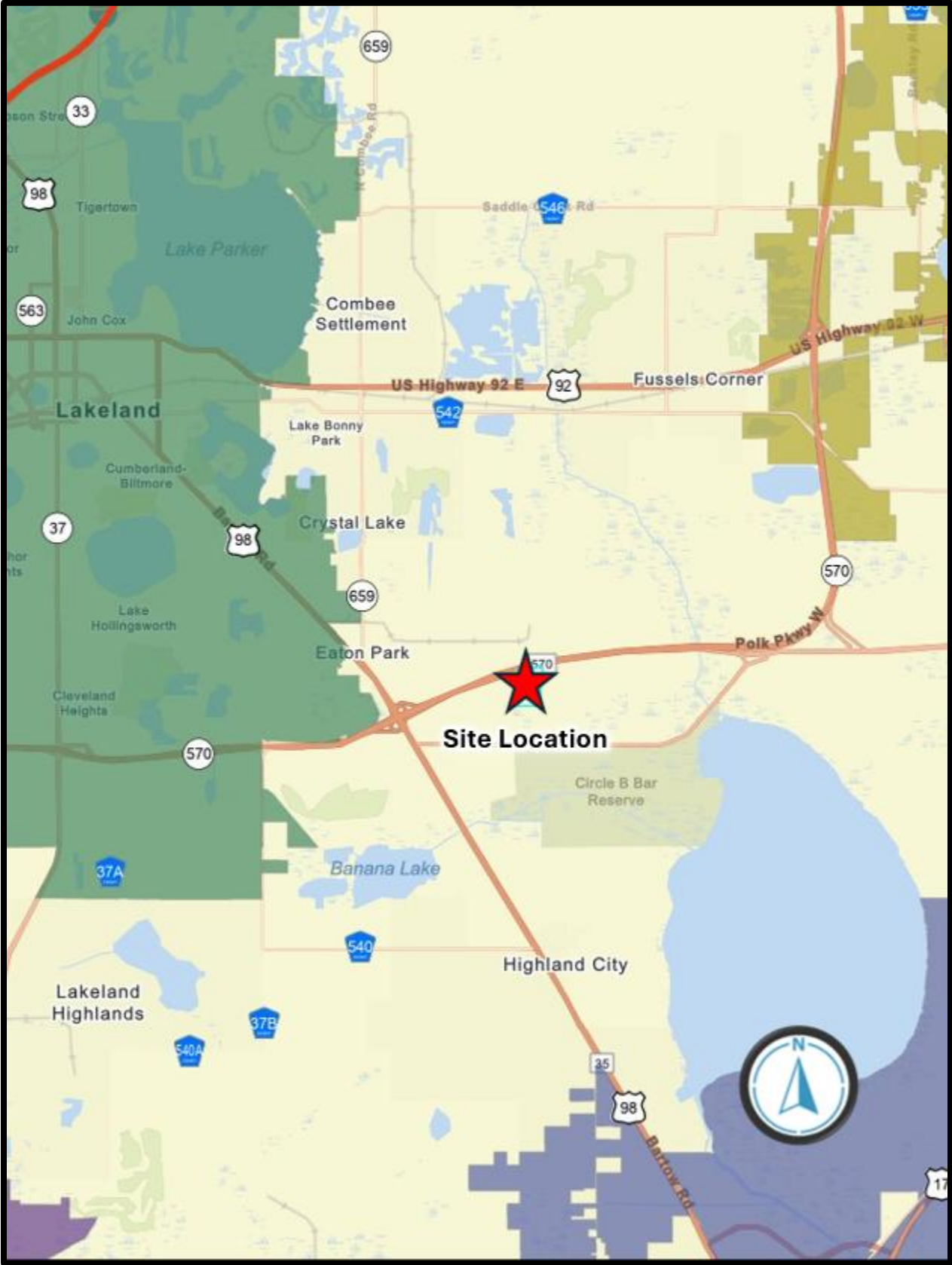
Polk County's Comprehensive Plan *Policy 2.102-A10* establishes review criteria intended to discourage the proliferation of urban sprawl. Specific characteristics of urban sprawl have been examined throughout this staff report and are summarized in Table 9 (below). Based on the findings of fact and analysis conducted, the proposed request does not meet the criteria to be considered as urban sprawl.

Table 9: Urban Sprawl Criteria

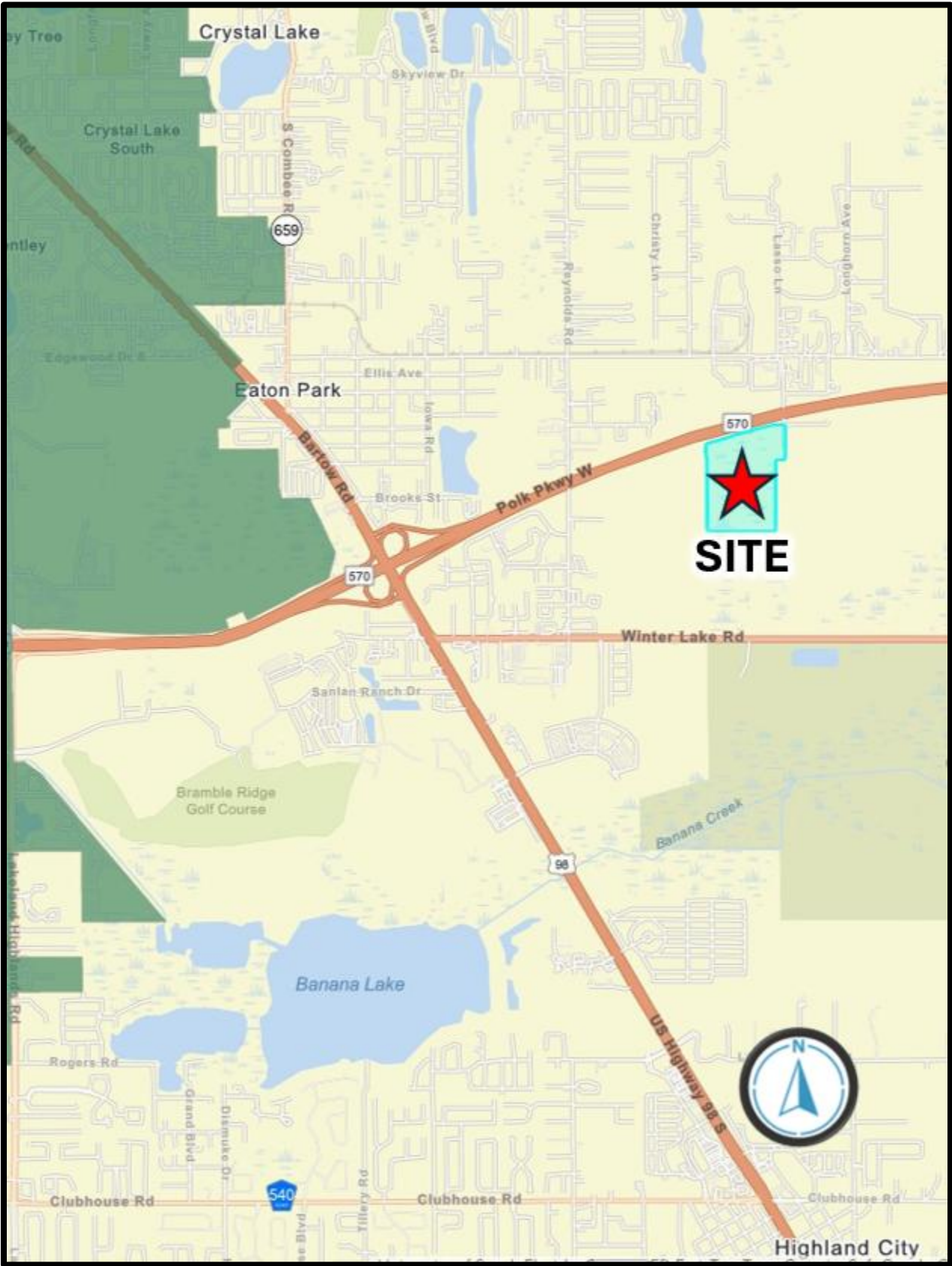
Rule 9J-5 Urban Sprawl Criteria	Page(s) within report
a. <i>Promotes substantial amounts of low-density, low-intensity, or single use development in excess of demonstrated need.</i>	Surrounding Land Uses Section
b. <i>Allows a significant amount of urban development to occur in rural areas.</i>	Surrounding Land Uses Section
c. <i>Designates an urban development in radial, strip isolated, or ribbon patterns emanating from existing urban developments.</i>	Surrounding Land Uses Section
d. <i>Fails to adequately protect and conserve natural resources and other significant natural systems.</i>	Environmental Conditions
e. <i>Fails to adequately protect adjacent agricultural areas.</i>	Surrounding Land Uses Section
f. <i>Fails to maximize existing public facilities and services.</i>	Schools, Public Facilities and Water/Sewer Sections
g. <i>Fails to minimize the need for future facilities and services.</i>	Schools, Public Facilities and Water/Sewer Sections
h. <i>Allows development patterns that will disproportionately increase the cost of providing public facilities and services.</i>	Surrounding Land Uses Section
i. <i>Fails to provide a clear separation between urban and rural uses.</i>	Surrounding Land Uses Section
j. <i>Discourages infill development or redevelopment of existing neighborhoods.</i>	Surrounding Land Uses Section
k. <i>Fails to encourage an attractive and functional mixture of land uses.</i>	Surrounding Land Uses Section
l. <i>Will result in poor accessibility among linked or related land uses.</i>	Surrounding Land Uses Section
m. <i>Results in the loss of a significant amount of open space.</i>	Surrounding Land Uses and Environmental Conditions Sections
Source: The following criteria are the primary indicators of urban sprawl per Rule 9J-5 of the Florida Administrative Code.	

Exhibits:

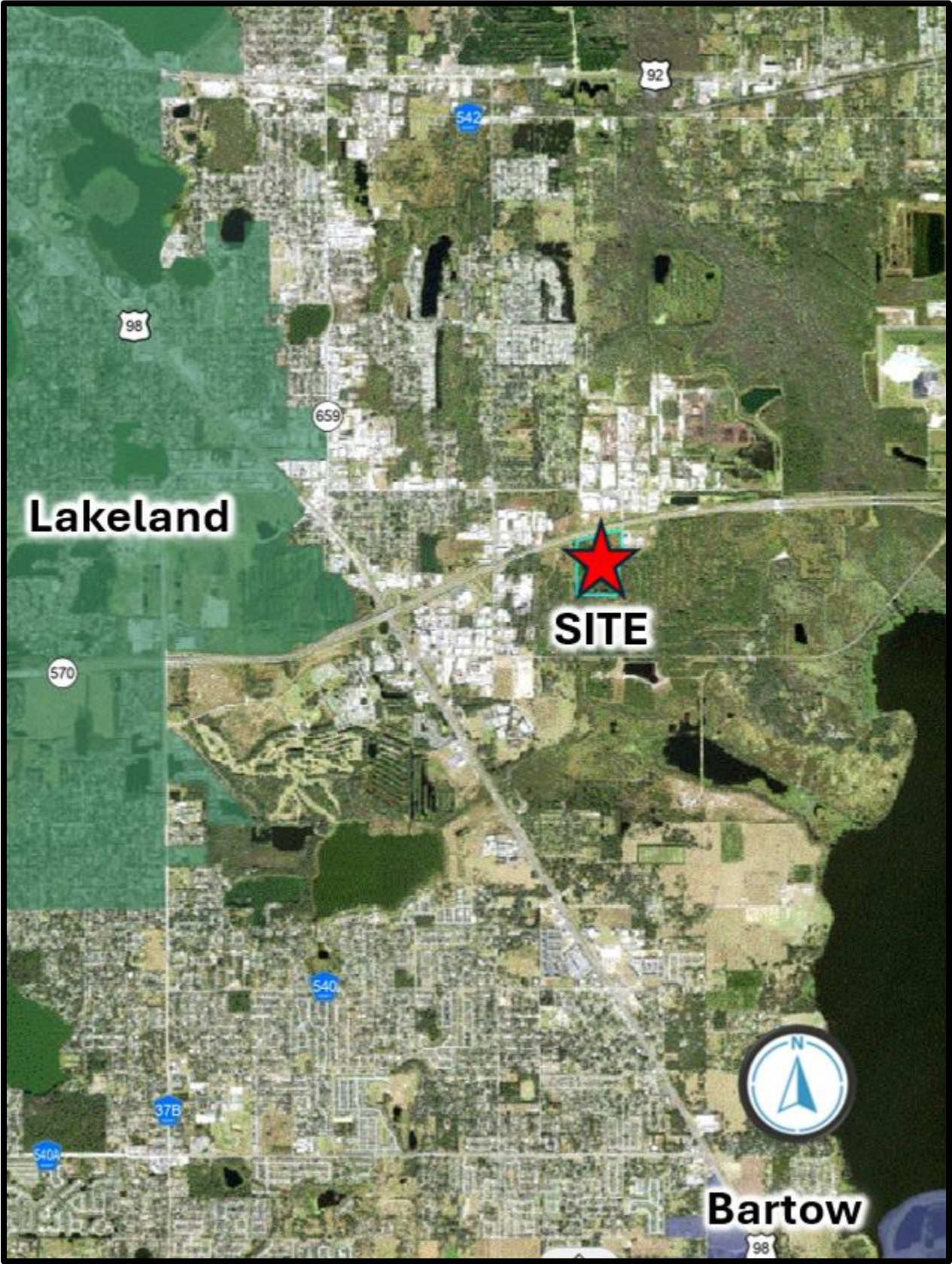
Exhibit – 1	Location Map
Exhibit – 2	Location Map (Detailed)
Exhibit – 3	2023 Aerial Photo
Exhibit – 4	2023 Aerial Photo (Detailed)
Exhibit – 5	Current Development Area Map
Exhibit – 6	Proposed Development Area Map



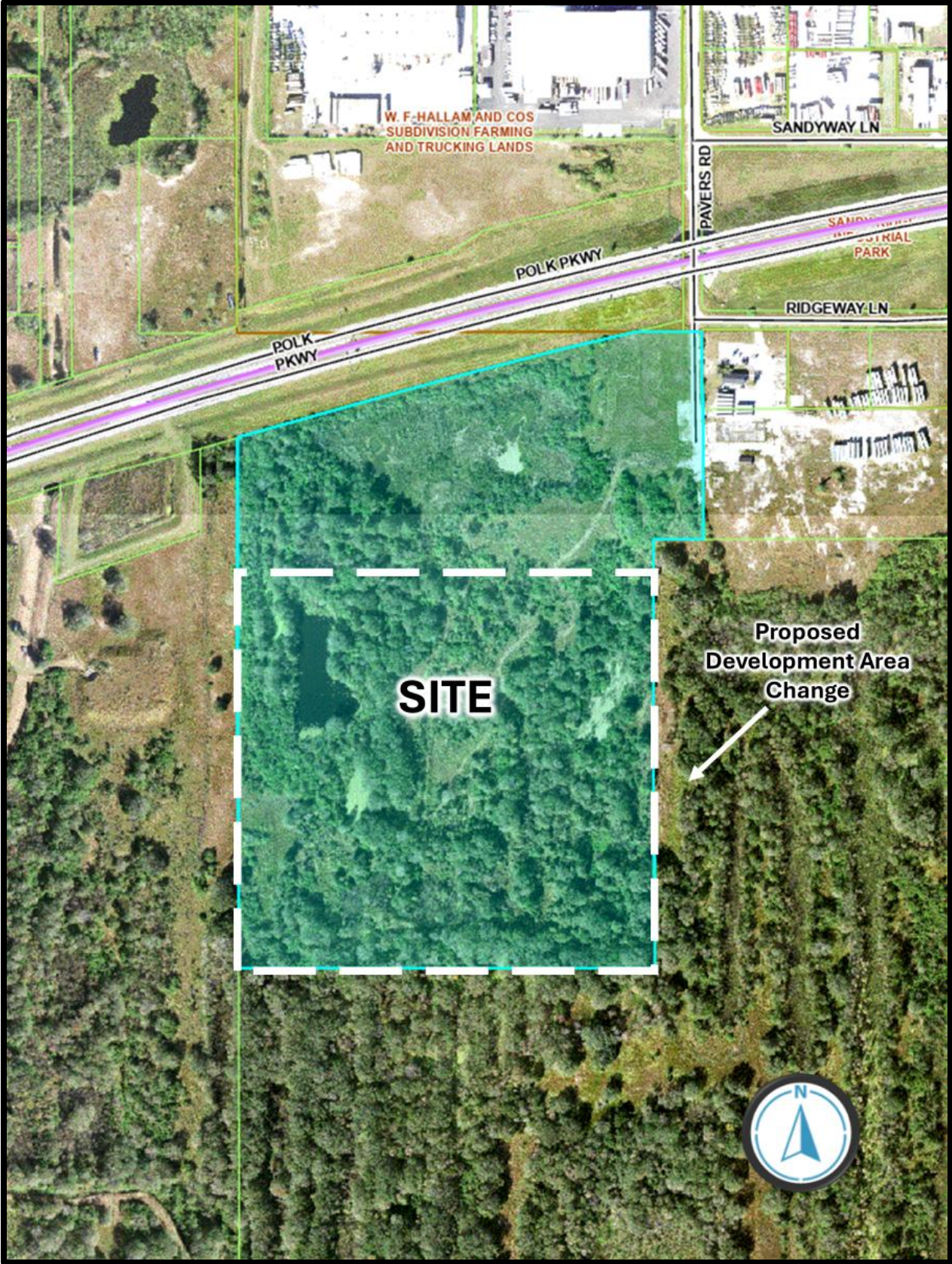
Location Map



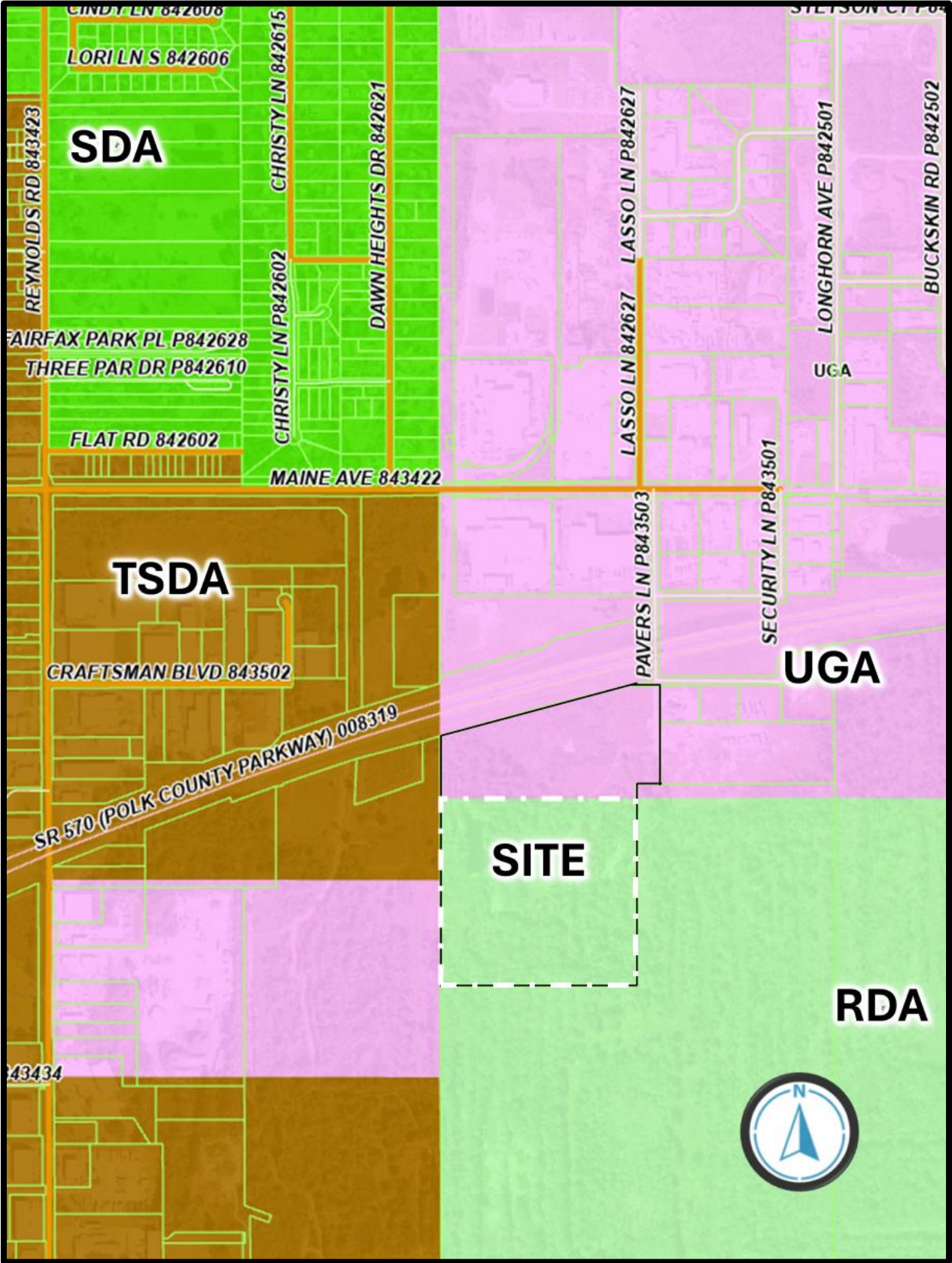
Location Map (Detailed)



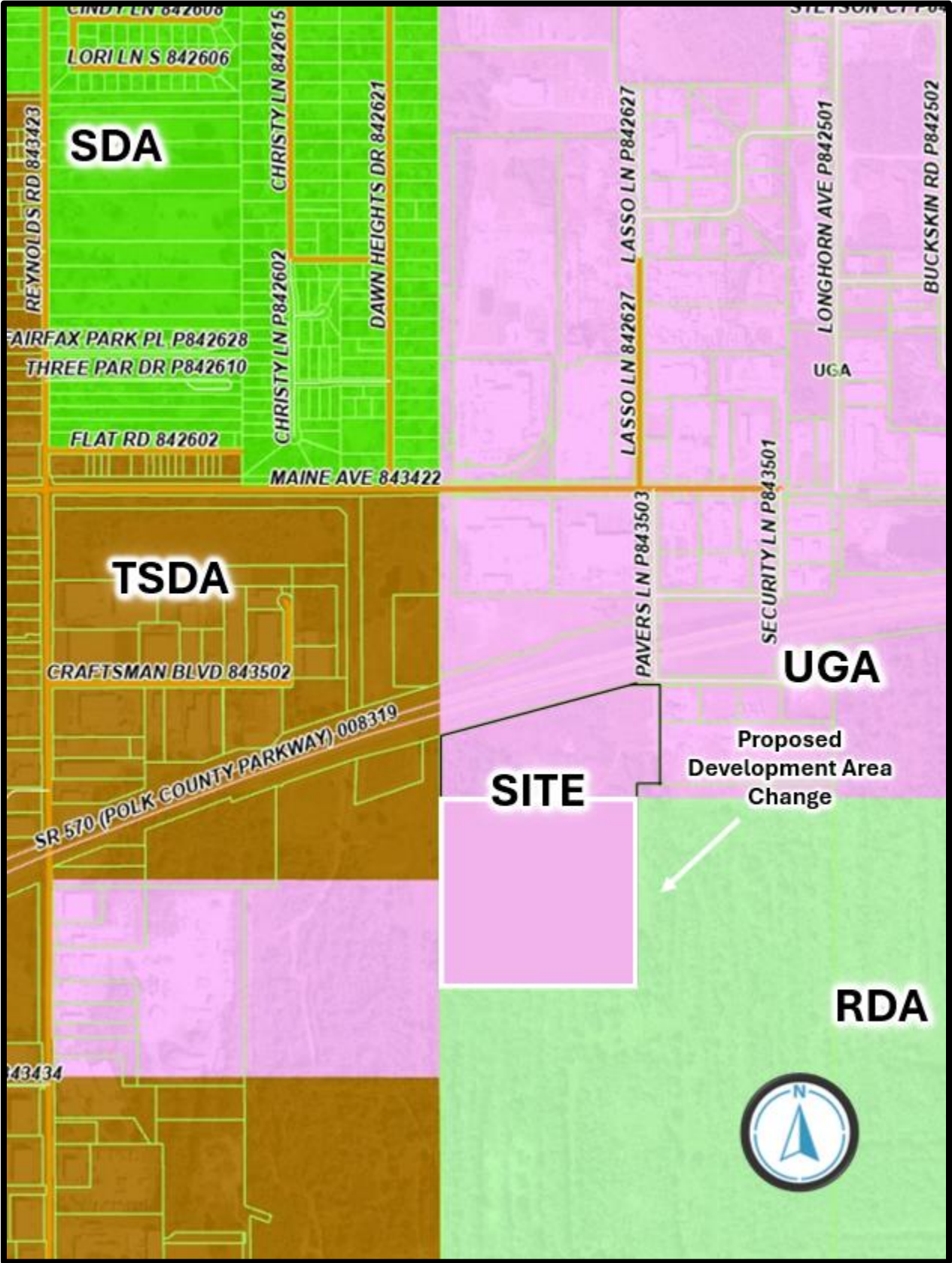
2023 Aerial Photo (Context)



2023 Aerial Photo (Detailed)



Current Development Area Map



Proposed Development Area Map