



July 22, 2026

Polk County Board of County Commissioners
Land Development Division
330 West Church Street
Bartow, FL 33831-9005

Re: Smale-scale Comprehensive Plan Amendment (CPA)
Development Area Map Amendment
Comprehensive Plan Analysis
2925 Pavers Road Industrial Storage Yard
LDCPAS-2026-12_2925 Pavers Road Industrial Storage Yard
2925 Pavers Road, Lakeland, FL 33803 (Parcel ID: 24-28-35-000000-012030)

To Whom it May Concern,

Madrid Engineering Group, Inc., dba Madrid CPWG/Madrid CFTL, is pleased to present this narrative in support of the proposed small-scale Polk County comprehensive plan amendment (CPA). The Owner, Visions of Lakeland LLC, proposes changing a portion of the parcel of land located at 2925 Pavers Road, Lakeland, Florida, from the Rural Development Area (RDA) to Urban Growth Area (UGA). The subject parcel is currently within both the UGA and RDA development areas. The northern portion of the site is within the UGA and the southern portion of the site is within the RDA. The parcels to the west are within the Transit Supportive Development Area (TSDA) and UGA. Parcels to the north and (north)east are within the UGA, while the south and east contiguous parcels are within the RDA.

The total parcel of land is 58.91 acres. The proposed small-scale CPA would remove 38.22 acres of RDA from the parcel and convert to UGA to unify the parcel. Therefore, the total area of the map amendment is under the 50-acre threshold for small-scale CPAs. Below is an analysis of certain sections of the Comprehensive Plan to support the proposed map amendment.

Compatibility Buffer

The original submittal documents reference a wetland conservation easement. However, the conservation easement will only be provided if required by SWFWMD. A 50' compatibility buffer per LDC Section 220 is provided and the plans show a 100' proposed buffer to account for County Ordinance No. 2026-023 regarding the Storage Yard land use category.

UGA Policies – Section 2.105 Comprehensive Plan

The below information and responses (*identified in italics*) are provided for each subsection of Section 2.105.

POLICY 2.105-A1: DESCRIPTION - Urban-Growth Areas shall:

- a. complement the TSDA in guiding growth, while promoting orderly and compact development;

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- 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 25-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:
 - 1. promote the development of walkable communities which include a balance between employment opportunities, mix of complementary uses and activities, and a range of housing opportunities;
 - 2. improve access to employment areas, schools, shopping and recreational opportunities;
 - 3. support the preservation of open space and natural areas;
 - 4. reduce capital and operating cost for the provision of infrastructure and public services.

The development will complement the TSDA area by providing growth and employment opportunities while not putting additional strain on the transportation, infrastructure and utility systems. The northern portion of the site is located within the Transit Corridor and Centers Overlay (TCCO) but outside the Transit Supportive Development Area (TSDA). The development is supported by the adjacent to Polk Parkway (SR 570). The development will preserve open space by providing a mixture of dry and wet ponds, a 100' compatibility buffer on the east and south sides of the property. No increase in capital and operating cost for infrastructure or public services are anticipated.

The site is within a rural area with minimal existing public facilities. Additional public facilities and services would not be warranted based on the potential increase in population or employment. The project will upgrade the adjacent Pavers Road and promote economic growth in the area.

POLICY 2.105-A2: DESIGNATION AND MAPPING - The Future Land Use Map Series shall designate and map UGAs for those areas of the County meeting the general characteristics of this [Section 2.105](#).
The comp plan amendment request is to alter and expand the current UGA boundary.

POLICY 2.105-A3: LAND USE CATEGORIES - The following land use categories shall be permitted within UGAs:

- a. **ACTIVITY CENTERS:** Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, and Employment Centers, High-Impact Commercial Centers shall be permitted within UGAs in accordance with applicable criteria.
- b. **RESIDENTIAL:** Residential-High, Residential-Medium, and Residential-Low Districts shall be permitted within UGAs in accordance with applicable criteria.
- c. **OTHER:** Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Professional Institutional, Office Centers, Leisure/Recreation, Institutional, Recreation and Open Space, Preservation.

Note: Some land use categories are only allowed in adopted Selected Area Plans, special areas or neighborhood plans as specified in [Section 2.109](#).

The development meets Policy 2.105-A3 (c) being an industrial land use category.

POLICY 2.105-A4: OVERLAY DISTRICTS - All Overlay Districts shall be permitted within UGAs in accordance with applicable criteria.

The development meets Policy 2.105-A4.

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:

- a. connect to centralized potable water;
- b. connect to centralized sanitary sewer systems if available.
- c. incorporate design features that promote healthy communities and green building practices, as established in [Section 2.1251](#), Community Design, of this element;
- d. promote the implementation of "Complete Street" and "Conservation Development" principles as established under [Section 2.1251](#), Community Design, of this element;
- e. promote the integration of 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. be encouraged to 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 and mixed uses; and
- k. additional standards supporting transit if development is within the "Corridor and Center Overlay" ([Section 2.124-A](#));

The development will connect to FGUA centralized water and sewer facilities. FGUA is in the process of expanding their service area boundary to include the proposed development. Currently, the FGUA service area abuts the property. Based on coordination with FGUA, water and sewer are available. The proposed development will be supported by fire, EMS and law enforcement. Security at the location will be provided via lighting and security fencing.

IND Development Criteria – Section 2.113-A4 Comprehensive Plan

The below information and responses (*identified in italics*) are provided for each subsection of Section 2.113-A4.

- a. Permitted uses include facilities for the processing, fabrication, manufacturing, recycling, bulk material storage, and distribution of goods, disposal yards, and limited retail commercial in accordance with Policy 2.113-A4.b. Other non-residential uses that produce significant amounts of noise, odor, vibration, dust, and lighting on and off-site may be permitted within an industrial district through conditional approval. Permitted uses also include any use found within a Business-Park Center.

The proposed storage yard and future warehousing is consistent with the permitted uses in the IND.



b. Retail commercial uses within an industrial area shall be sized for the purpose of serving just the employees of, and visitors to, the industrial area, and shall be limited to a scale appropriate for that purpose. The maximum floor area ratio for commercial uses within an industrial area shall not exceed 0.25.

Not applicable; no commercial uses proposed.

c. Industrial sites shall be designed to provide for:

1. adequate parking to meet the demands of the use; and
2. buffering where the effects of lighting, noise, odors, and other such factors would adversely affect adjacent land uses. Parking lots, loading areas, dumpsters, utilities and air conditioning units, signage, etc., are examples of facilities which may require special buffering provisions.

The development will provide adequate parking for the proposed use based on LDC requirements and final building sizes. Appropriate buffering will be provided. Also, based on the proposed use, the site will conform to the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category which includes lighting, noise, etc. criteria.

d. The maximum floor area ratio for non-commercial uses within an Industrial area shall not exceed 0.75 in the TSDA, 0.65 in the UGA, 0.50 in the SDA, and 0.50 in the RDA, unless developed as a Planned Development.

The maximum FAR will not exceed the 0.65 threshold in the UGA. The current plan with future warehousing utilizes only 0.025 (2.5%) FAR.

e. Retail sale of goods manufactured on the site of a business located within an Industrial area is allowed provided the operation is incidental and subordinate to the manufacturing activity conducted on site and does not exceed eight percent (8%) of the total floor area or 15,000 square feet, whichever is the lesser.

Not applicable; no sale of goods is proposed.

f. Where centralized water or wastewater services are not available, the maximum impervious surface ratio shall be reduced to afford better protection and function of well and septic tank systems and as required if within a Nutrient Restoration Plan Overlay.

The development will connect to FGUA centralized water and sewer facilities. FGUA is in the process of expanding their service area boundary to include the proposed development. Currently, the FGUA service area abuts the property. Based on coordination with FGUA, water and sewer are available.

g. Planned Developments within the Industrial district may be permitted a maximum floor area ratio up to 1.5 for innovative and attractive employment centers. Intensity increases shall be reserved for those uses that provide substantial economic income opportunities for the County and its residents. Intensity increases shall only be granted to parcels within the TSDA and UGA. The Land Development Code shall establish development standards and criteria for Planned Developments within the Industrial district.

Not applicable; development not within planned development.



h. Industrial districts shall be separated from existing schools and developed residential areas through physical separation, screening, buffering, or a combination thereof, consistent with the standards in the County's Land Development Code.

Appropriate buffering will be provided per the LDC as well as the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category.

i. Workforce housing for unaccompanied workers in barrack, dormitory, or apartment units under specific design parameters listed in the Land Development Code not to exceed an intensity of thirty-two (32) workers per acre or the limitations established by the agency with authority for water and wastewater usage, whichever allowed intensity is the lesser.

Not applicable; none proposed.

Wetland Protection Areas – Section 2.123 C Comprehensive Plan

POLICY 2.123-C1: DESIGNATION AND MAPPING - The Future Land Use Map Series shall designate and map as "Wetland-Protection-Area" overlay those areas generally described as wetlands by the Florida Land Use, Cover and Forms Classification System (FLUCCS) and/or as determined to be jurisdictional by appropriate regulatory agencies. These agencies include the Water Management Districts, the Florida Department of Environmental Protection, the U.S. Army Corps of Engineers, and Polk County.

POLICY 2.123-C2: DEVELOPMENT CRITERIA - Development within a wetland, as determined by appropriate regulatory agencies having the authority to designate areas as wetlands and exercise jurisdiction over the wetlands so designated shall conform to the following criteria:

a. Every reasonable effort shall be required to avoid or minimize adverse impacts on wetlands through the clustering of development and other site planning techniques. Mitigation will only be permitted in accordance with applicable state standards.

Wetland impact minimization and mitigation will be provided through several components. Wetland minimization is underway and the potential buyer is looking to reduce the wetland impacts even more than shown on the current concept plans.

A designated Floodplain compensation area will be placed along the northern portion of the site which will minimize wetland impacts and provide a natural buffer, south of Polk Parkway. The designated floodplain compensation area within the existing wetland area will add greater ecological value to the site, over other floodplain compensation options.

b. Wetland impacts where unavoidable and where properly mitigated, as determined by agencies having jurisdiction, shall be permitted for:

1. Resource-Based Recreational Uses as defined by this Plan that are compatible with wetland functions;
2. access to the site;

3. necessary internal traffic circulation, where other alternatives do not exist, or for purposes of public safety;
 4. utility transmission and collection lines;
 5. pre-treated storm-water management;
 6. mining that meets state and federal regulations; or
 7. expansion of an existing use or a new use where upon consultation with the appropriate regulatory agency (prior to permitting) it is determined that the proposed mitigation implements all or part of an agency or jurisdiction's plan and provides greater long term ecological value than the impact.
- Wetland impacts will occur in the above permitted instances (including internal circulation and storm water management) and will be properly mitigated.*

c. Commercial and industrial development shall locate on the non-wetland portion of a development site. *The proposed development components are located to minimize wetland impacts.*

- d. If a site is such that all beneficial use of the property is precluded due to wetland restrictions, then the parcel shall be allowed to develop as follows:
1. a maximum of one dwelling unit per Lot of Record; or
 2. at a gross density of one dwelling unit per ten acres (1 DU/10 AC). No parcel shall be created after December 1, 1992, which consists entirely of wetlands, unless accompanied by a deed restriction which prohibits future development on the parcel.
- No residential dwelling units are proposed.*

e. Development shall be required to locate on the non-wetland portions of a development site. The Land Development Code shall permit residential densities to be transferred from wetland areas to contiguous non-wetland areas within the same development subject to the provisions of Policy 2.123-C3. *The proposed development components are located to minimize wetland impacts and located on the upland portions of the site. No residential dwelling units are proposed.*

f. In accordance with Section 163.3184(6)(c), F.S., the County shall defer the delineation of jurisdictional wetland limits and wetland mitigation amounts to the applicable federal, state or regional permitting agency. *The proposed development has delineated the wetlands through professional ecologist and appropriate surveying. The delineation will be confirmed with the appropriate permitting agencies.*

g. All permits from an agency with jurisdiction shall be approved prior to, or concurrently with, the County issuing a final development order. *The proposed development will furnish all permits from agencies having jurisdiction prior to final development order approval.*

h. Polk County will coordinate with regulatory agencies to identify and implement procedures to support compliance with permit terms and conditions as part of the County's building inspection and code enforcement activities.

Policy acknowledged.

POLICY 2.123-C3: TRANSFER OF RESIDENTIAL DENSITIES - Residential densities may be transferred from wetland areas to contiguous non-wetland areas within the same development subject to the following:

a. Residential densities shall be transferred from the wetland areas to non-wetland areas based on the wetland density of one unit per ten acres (1 DU/10 AC) where any development occurs within the wetland area of the project.

b. Residential densities shall be transferred from wetland areas to non-wetland areas at a density of one dwelling unit per acre (1 DU/AC), or at the underlying land use density if the underlying density is less than 1 DU/AC, only when there has been no disturbance to wetlands. Portions of lots may be platted into wetland areas and shall not be construed as having disturbed wetland areas for this density-transfer provision so long as that portion of the lot does not include any fill, construction, improvements, or other development, and a restriction is placed upon the plat to prohibit such future actions within wetland areas.

c. All such transfers of density shall:

1. be to contiguous property under the same ownership or control;
2. only be permitted within a subdivision platted and developed in accordance to the County's Land Development Code;
3. not result in lot sizes, or areas per dwelling unit, less than 65% of that required by the County's Land Development Code (the minimum lot/area size shall be exclusive of the wetland area); and
4. be noted on the face of the final plat as a restrictive covenant enforceable by the Board of County Commissioners.

Not applicable; No residential densities proposed or adjacent to property.

POLICY 2.123-C4: LAND-DEVELOPMENT REGULATIONS - Polk County shall implement land development standards adopted in the Land Development Code, for establishing standards and procedures to:

a. provide for the transfer of residential and non-residential densities from the Wetland-Protection Area, pursuant to Policies 2.123-C2. and 2.123-C3.;

b. provide for construction techniques which will not alter the natural retention and filtering capacities of the wetland; and

c. require that all permits from an agency with jurisdiction (i.e. U. S. Corp of Engineers, Water Management District, Florida Department of Environmental Protection, etc.) be approved prior to, or concurrently with, the County issuing a final development order.

Policy acknowledged.

POLICY 2.123-C5: The County shall implement, through the land development regulations, the transfer of development rights which allows the transfer of density to off-site and on-site locations outside the wetland areas, and shall continue to investigate other techniques that promote and encourage the preservation of wetlands.

Policy acknowledged.



POLICY 2.123-C6: The County shall partner with resource and permitting agencies, other local governments, and the private sector to identify opportunities and evaluate the feasibility of establishing wetland mitigation banks within Polk County. These efforts shall include the evaluation of opportunities to establish mitigation banks to implement the Water Resource Sustainability Plan for the Peace Creek Watershed; to complement the Habitat Conservation Plan and the PolkGreen District; and protection of drainage basins of special concerns.

Policy acknowledged.

Please do not hesitate to contact me if any additional information is required.

Madrid Engineering Group, Inc.

A handwritten signature in blue ink, appearing to read 'Z Thornton', is positioned above the printed name.

Zach H. Thornton, P.E.
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