

**POLK COUNTY
LONG RANGE PLANNING DIVISION
STAFF REPORT**

DRC Date:	April 16, 2009	LEVEL: 4
PC Date:	July 14, 2009	TYPE: Large Scale Map Amendment
BOCC Date:	August 5, 2009 December 1, 2009	CASE #: CPA 09B-04

Project Number: 54056

Request: Applicant initiated request to change approximately 300 ± acres from Phosphate Mining (PM) to Industrial (IND) in the Rural Development Area (RDA).

Applicant: Tom Mims

Property Owner: Mims Alafia, LLC

Location: The site is located on the east side of State Road 37 and on the east and west sides of Old Highway 37, south of County Road 640 and north of Bradley Junction, Florida, In Sections 25, 26, 35 & 36, Township 30, Range 23 and Section 02, Township 31, Range 23.

Size: 300 ± acres

Land Use Designation: Phosphate Mining (PM)

Development Area: Rural Development Area (RDA)

Nearest Municipality: City of Mulberry and the Phosphate Mining Review Group were notified via email on March 30, 2009

Case Planner:

Adoption Report Tom M. Deardorff, Growth Management Director

Transmittal Report Ameen N. Bailey, Senior Planner

Summary of Analysis:

This is an applicant initiated request to change the Future Land Use designation from Phosphate Mining (PM) to Industrial on approximately 300 ± acres on nine (9) parcels in the Rural Development Area (RDA). The legal description provided describes the eight (8) Map IDs, which do not always correspond with the parcel id.

These descriptions are used throughout the staff report and are detailed below and are displayed in Exhibits 2-4.

Parcel ID	Parcel Acreage	Map ID	Map ID Acreage
233025000000031030	91.4	1	91.4
233036000000031010	14.8	2	26.8
233025000000044010	12.0	2	
233036000000033030	7.0	3	38.8
233036000000031010	6.0	3	
233026000000022070	6.2	3	
233035000000011040	8.9	3	
233035000000011030	4.4	3	
233025000000044010	6.3	3	
233035000000014020	0.9	5	
233035000000014030	10.4	5	11.3
233035000000011030	55.8	6	55.8
233102000000011040	59.6	8	59.6
233102000000011040	7.6	9	7.6
233102000000011040	8.7	11	8.7
TOTAL	300 ±		300 ±

The site is located in the southwest portion of the County, within a large PM district. Staff recognizes that this area is transitioning as the mining industry moves south out of Polk County. Significant planning needs to be applied to this area to create a cohesive community with the appropriate infrastructure to support the transition.

Approximately 200,000 acres or 15.3 percent of Polk County have been mined for phosphate rock or used to support the mining industry. The industry's impact on the Polk County economy is in decline and will continue to decline in the 21st Century as phosphate mining moves south into Hardee and Desoto Counties. Some chemical manufacturing plants will continue to be located in Polk County and may convert to process new phosphate products. Currently approximately 188,000 acres or 14 percent maintains the Phosphate Mining (PM) Land Use designation. Phosphate mining is a temporary use of the land and the majority of the PM district has been mined and is now very rural in nature. The water consumption and trip generation within the PM district will continue to decrease as mining and processing activities move further south into neighbouring counties. Currently the Future Land Use district is not divided in any way to differentiate between areas mined and process areas. The entire district is designated at Phosphate Mining (PM), with one set of development criteria. The development criteria are for the structural improvements and these have typically been industrial in nature. Therefore staff uses industrial as the highest potential use within the PM district for analysis and comparison. Analysis throughout the report, such as the generation tables, reference the build out of the PM district with industrial uses. Since the PM district is unique, this comparison does not always represent the current existing rural conditions or a realistic future use of the PM land. Nor should it lead to the assumption that the entire 200,000 acres of mined land in Polk County could or should be developed as industrial.

Industrial (IND) districts are characterized by facilities for the processing, fabrication, manufacturing, assembly, recycling, and distribution centers, research and development parks, wholesaling activities and

some retail uses. These districts are the appropriate location for land use activities that produce significant amount of noise, odor, vibration, dust, and lighting on and other off-site impacts. Portions of the overall site meet some of the location criteria for IND, but the site does not meet other criteria in the Comprehensive Plan. In addition to the IND policies, the location criteria for IND reference Policies in Section 2.102 and 2.110-L2. The Policies in 2.102 address **Compatibility (Policy 2.102-A1)**, **Timing (Policy 2.102-A3)**, **Location Criteria (Policy 2.102-A9)**, and **Urban Sprawl (Policy 2.102-A10)**.

Policy 2.110 L2 addresses **Activity Center Plans**: which are required for new IND districts. This Policy addresses the Activity Plan requirements, which at a minimum include addressing land uses designations for all property within the center, development criteria, development restrictions (if appropriate), traffic circulation plan, special transportation restrictions (if appropriate), and the identification of environmentally sensitive lands and endangered natural communities and outline proposals for the preservation and/or conservation of these areas. The applicant has begun to address some of these issues, such as the identification of environmentally sensitive lands and endangered natural communities through their response to the Department of Community Affairs (DCA). This policy helps address issues for large developments or developments that can have impacts beyond the adjacent properties. Specifically, the infrastructure portion of the plan is an area of concern for large Industrial Parks, such as this request. Typically documentation addresses the minimum population to support a land use designation, the lack of available land with the needed Future Land Use designation, or the need for a specific end user.

Policy 2.102-A1 - Compatibility: This policy requires development be compatible to adjacent uses through buffering, limited intensity and scale of the more intense use, and a transition of intensity through gradual scaling of different land use activities. The Future Land Use proposal is requesting IND next to Agriculture/Residential-Rural (A/RR). The A/RR districts contain the communities of Oakdale/Oak Terrace, Pierce/ Rolling Hills, Pinedale, and Bradley Junction which are occupied by single-family residences. The applicant has made the argument that the PM district allows the same intensity as IND. Although these communities have experienced the impacts of mining operations, these activities were temporary in nature and are decreasing in quantity in Polk County as the mining industry moves south. Phosphate mining has already reached its peak and never developed at the intensity allowed nor did it develop with high amounts of allied uses. The PM district surrounding these communities is now very rural in nature and it is extremely unlikely the PM in this area would be re-mined, used for processing, or needed for allied industries. Therefore, PM is not always the same intensity as IND. Policy 2.113-A3 (e) also state that IND districts shall be separated significant distances from developed residential areas. Also there are many other Future Land Uses districts that could serve as a transition between the rural residents to an industrial type use. When evaluated as a whole the 300 acres of IND could have a substantial impact to the surrounding communities such as noise, traffic, odor, vibration, dust, and lighting on and other off-site impacts. When evaluated as individual parcels, Map ID 1 and 8 would have the least impact on the surrounding communities.

Policy 2.102-A3 – Timing: This policy requires development to be “timed and staged in conjunction with the cost-effective and efficient provision of supporting community services” as related to Levels of Services.

Policy 2.102-A9 - Location Criteria: This policy requires that the County in approving development shall give consideration to the accessibility of transportation facilities, adequacy of water and sewer services, adequacy of emergency service response times, availability of recreational facilities, the location of schools, development limitations, environmental factors, and the proximity to incompatible land uses. Consideration

should also include economic factors such as the cost of infrastructure, minimum population support and market area radius.

The proposed site is located within the Rural Development Area (RDA). According to Objective 2.108-A of the Polk County Comprehensive Plan, the RDA was designed to provide for rural activities such as agriculture uses, mining activities, rural residential uses, and for areas to be available for future long-range urban-expansion activities. Industrial, however, is a permitted land use within the RDA with corresponding limitations on floor-to-area ratio. Infrastructure, such as potable water, fire water, and wastewater services, are limited within this area. Properties located in the RDA are not required to connect to centralized sewer and potable water.

Some transportation tools are in place such as rail and a transit route. Although, the overall transportation roadway network system in this area is currently operating above the adopted Levels-of-Service (LOS), the request would consume the majority of the available capacity on the access roads. The two main access roads (Old Highway 37 and State Road 37) have a combined available capacity of 1,222 trips, with an additional 358 trips on CR 640. The request includes the potential for 1,326 PM Peak Hour Trips. If the parcels are evaluated on an individual basis, not all of the parcels meet the IND locational requirement (Policy 2.113-A3 (f)) for access to an arterial road system, and the rail dividing the parcels limits access between parcels. The parcels that meet the road system criteria are Map ID 1, 5, and 8 only.

In addition, the infrastructure has not yet absorbed the potential impacts to the IND site approved by the BoCC in June 17, 2009. This site is located along CR 640 with intersections at SR 37 and Old 37. The site is shown in Exhibit 5 and displays the 44 ± acres site (CPA 09A-04), which is adjacent to Parcel 1 of the request. The maximum impact from this site could be 1,377 Average Annual Daily Trips and 189 PM Peak Hour Trips. In addition, the amount of available developable IND land designated as IND in the County is over 2,000 acres.

Policy 2.102-A10 Urban Sprawl—The Urban Sprawl policy states that “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.” Developments that “allow 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” are inconsistent with this policy. The policy also discourages development that “promotes, allows or designates for development substantial areas of jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need.”

The applicant has prepared a detailed analysis to address the issue of urban sprawl. (See applicant’s response to ORC Report.) This analysis notes the transportation geography (highway and rail), topography and distribution of developable and undevelopable lands on either side of SR 37. These factors either dictate or contribute to a development pattern that is linear in nature. The applicant’s analysis provides a credible argument that the proposed request does not constitute sprawl. Further, access to rail may serve to reduce the energy consumption associated with the future industrial uses due to the potential reduction in truck traffic.

Findings of Fact

- *This is an applicant initiated request for a Large Scale Comprehensive Plan Map Amendment to change the Future Land Use designation on nine (9) parcels. The request is to change approximately 300± acres from Phosphate Mining (PM) to Industrial (IND) within the Rural Development Area (RDA). The legal description provided describes the eight (8) Map IDs. These descriptions are used throughout the staff report and are displayed in Exhibits 2-4.*
- *The City of Mulberry is approximately three miles north of the northern most portion of the site. Notification of this case was sent to the City of Mulberry and the Phosphate Mining Review Committee for comments, which are included in the section “Comments From Other Agencies”.*
- *Adjacent Future Land Use districts include Phosphate Mining (PM) in all directions. Enclaves of Agriculture/Residential –Rural (A/RR) are located to the east and west of the site. IND and BPC are located to the east and north of the site. An enclave of Rural Cluster Center (RCC) with residential and commercial is located south of the site.*
- *The majority of the site and surrounding areas have been either mined or used for mine-related industries including offices, utilities, railroad, processing plants, and vacant mined land. There are several residential communities directly adjacent to the site totaling over 700 lots.*
- *According to Policy 2.113-A1 and A4, Industrial districts are characterized by facilities for the processing, fabrication, manufacturing, recycling, bulk material storage, distribution of goods, disposal yards, limited retail commercial, and may contain any use also found within a Business-Park Center. Industrial districts are also the appropriate location for land use activities that produce significant amount of noise, odor, vibration, dust, and lighting on and off-site that do not produce a physical product.*
- *According to Policy 2.113-A3 Industrial districts should be located where accessible to major air and ground transportation, including but not limited to arterial roadways, rail lines, and cargo airport terminals. Industrial facilities should be grouped together in planned industrial districts on sites capable of being expanded and developed in stages.*
- *According to Policy 2.113-A3 and B3 Industrial districts shall be separated significant distances from schools and developed residential areas through a combination of physical separation and screening and/or buffering in accordance with standards in the County’s Land Development Code. The location criteria for Industrial districts should maximize access to the arterial road system and minimize the routing of commercial traffic through residential areas.*
- *Unlike other development areas, in the Rural Development Area (RDA), there is no expectation that urban services are available or planned. Urban services that are not generally available or available at the same standard in the RDA include centralized potable water, centralized wastewater, public safety, an urban-road network, developed parks, and schools.*

- *Section 2.102 of the Polk County Comprehensive Plan addresses the compatibility, distribution, timing, development policies and standards, topography considerations, soils, public facilities and utilities, location criteria, and Urban Sprawl criteria for development within unincorporated Polk County.*
- *The site is partially located within the Polk County Utilities potable water service area, however there are no plans to expand the capacity of the existing system. Polk County's Bradley Service Area supplies potable water to the communities of Pierce and Bradley Junction. Centralized sewer is not available in this area except for the community of Oak Terrace.*
- *The two main access roads are Old Highway 37 (Old 37) and State Road 37 (SR 37). Old 37 is a two-lane undivided road classified as a Major Rural Collector. SR 37 is a two-lane undivided road classified as a Minor Arterial with uninterrupted flow due to minimal driveways. Both roads are currently operating above their minimum Level-of-Service (LOS). A third potential access road is County Road 640 (CR 640), which is a two-lane undivided road classified as a Minor Arterial with uninterrupted flow due to minimal driveways. CR 640 is operating at its minimum Level-of-Service (LOS).*
- *Old 37 has 357 PM Peak Hour Trips available southbound and 343 PM Peak Hour Trips northbound (Total of 700). SR 37 has 286 PM Peak Hour Trips available southbound and 236 PM Peak Hour Trips northbound (Total of 522). CR 640 has 131 PM Peak Hour Trips available in the eastbound direction and 227 PM Peak Hour Trips available in the westbound direction. Together the two main access roads have 1,222 trips available, with the potential addition of CR 640 there are 1,580 trips available. The estimated trip generation for the proposed use could utilize 1,326 PM Peak Hour Trips with a total of 9,467 trips per day.*
- *The site is located in the Polk County Sheriff's Southwest District Command, which is located approximately 15 miles from the project's location with an estimated response time of 12 to 15 minutes. The Sheriff's Office has no plans funded at this time for an additional station or additional deputies in this area of the County. Fire services are provided by Station 4 - Bradley. The station is located approximately two to three miles from the subject site, with an approximate response time of four to eight minutes. EMS services are provided ALS Station 7 – Mulberry approximately four to five miles from the site with a response time of six to seven minutes.*
- *The site is located in an endangered habitat and species one mile buffer zone as established by the Florida Natural Areas Inventory (FNAI) and seven or more focal species are associated with the site according to the Florida Game and Fish Commission.*
- *Wetlands and floodplains are located on the proposed site and are immediately adjacent to North Prong Alafia River.*
- *The soils on the site have been altered and significant removal and/or soil amendments may be necessary to support any type of development on the site.*
- *The majority of the site was mined after 1975 therefore, reclamation is mandatory. Mosaic Fertilizer LLC is responsible for these reclamation obligations and is performing reclamation activities. The individual parcels within the request are numbered according to the legal description that was submitted and*

displayed on Exhibits 2-4. According to the Florida Department of Environmental Protection (FDEP) Bureau of Mine Reclamation (BOMR) the parcels in the application are in various stages or reclamation. Parcels numbered 3, 5, 6, 8, 9, and 11 are completely released. Parcels numbered 1 and 2 are part of a larger unit that is partially released. The uplands, lakes, and herbaceous wetlands are released while the forested wetlands are not released. The two areas not released are located south of Parcel 1 and east of Parcel 2. Parcel 1 was modified from its original acreage to remove a portion of the un-released wetland area.

Long Range Planning Division Recommendation: The current application differs from the original submitted by the applicant. All of the parcels with a previous request for a BPC land use designation (Map ID 4, 7 and 10) have been eliminated from the current application.

Based on the information provided by the applicant, recent site visits, and the staff report, the Long Range Planning Division finds that the proposed overall request **IS NOT CONSISTENT** with the surrounding land uses and general character of the area, and **IS NOT CONSISTENT** with the Polk County Comprehensive Plan.

The Long Range Planning Division recommends **APPROVAL of CPA 09B-04** with the exclusion of Parcels 6 and 9. Staff has concerns regarding the compatibility of the proposed industrial land uses on these parcels. These parcels are located in close proximity to Pierce/Rolling Hills, and access to these parcels would be provided via Jamison Road, a local residential road.

Planning Commission Recommendation: Based upon the information provided, the staff report and staff presentation; the Planning Commission recommended **APPROVAL of CPA 09B-04 (Vote 6:1)** with one proposed change to the request. The Planning Commission proposed to remove a small portion of BPC within the original request.

Board of County Commissioners Transmittal: Based upon the information provided, the staff report and staff presentation; the Board of County Commissioners(BoCC) recommended **TRANSMITTAL of CPA 09B-04 (Vote 4:1)** with a reduction in the amount of Business Park Center (BPC) in the original request.

Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC) Report: Urban Sprawl and Energy Efficient Land Use Patterns

The amendment could potentially allow more than 7 million square feet of Business Park Center (BPC) and Industrial development within an area that the comprehensive plan has designated as a Rural Development Area. The site is surrounded entirely by lands designated for phosphate mining or agriculture. The BPC land use would allow residential development at a density of up to 15 units/acre on 14.4 acres of the site and could allow as many as 216 residential units. The site is located more than three miles south of the City of Mulberry and is located roughly in the middle of an expanse of land formally mined for phosphate in the Southwestern corner of the County. While the area has already been mined and may eventually transition to some other type of land use, it has not been demonstrated that the proposed land use designation is appropriate for this site at this time. The amendment does not discourage the proliferation of urban sprawl for various reasons. The amendment would allow urban development to occur in a rural area at a substantial distance from the nearest urban area while failing to adequately protect and conserve natural resources, promotes development in a linear pattern along State Road 37 and Old Highway 37, and fails to provide a clear separation between rural and urban land uses. Also, the area is

currently not served by any public water and sewer, and the County does not have plans to serve the site in the near future. The amendment leap-frogs into the rural area and will allow development to occur in a sprawling energy inefficient pattern that will result in greater dependence on automobile use that will not reduce greenhouse gas emissions as required by state law.

Sections 163.3 I77(6)(a), (8), and (1 O)(e), F.S., Rules 9J-5.005(2), 9J-5.006(2)(a) and (b), (3)(b)1., and 8., and (5) and (3)(c)1., 3., and 6., and 9J-5.01I(2)(b)3., F.A.C.

Applicant Response:

The applicant has decided to remove the BPC parcels and BPC request from the application, with only the 300 acres of the Industrial parcels included. All residential concerns are no longer applicable.

This project is located in an area of the County that is in transition and is subject to change over time due to the existing land use and development activity. Several properties near this site are designated as IND or BPC and an adjoining 50-acre site has recently been assigned Industrial land use. The presence of wetlands and other undevelopable lands within this region give the appearance of “leap-frog” development, yet taking into account only the developable lands indicate otherwise. See Figure 1 labeled, “Surrounding Development Map”, showing undevelopable land, existing developed sites, the project site and available developable land.

SURROUNDING PHOSPHATE (PM) STATUS

The vast majority of the surrounding parcels in this area of the County are currently designated as PM FLUM element. While the applicant recognizes that some of the PM FLUM parcels have been mined and reclaimed and is suitable for transition to other land uses, the majority of the PM FLUM parcels are not suitable for transition to other land uses. The majority of the PM FLUM parcels surrounding the application area should be considered the same as heavy industrial use due to the existing gypsum stacks, the need for future gypsum stack locations, existing chemical plants, water storage and treatment areas, pollution abatement areas, non-mandatory mining, and waste clay disposal areas. The attached Figure 2 “Mandatory Phosphate Mines Reclamation Status”, published by the FDEP Bureau of Mining and Minerals Regulation shows the location of 12 gypsum stacks surrounding the application parcels. These 12 locations are all currently zoned PM and currently have or previously had major chemical manufacturing facilities attached to them.

The New Wales Chemical Plant located three miles west of the application parcels is a good example of the current heavy industrial nature of the surrounding PM land uses. This complex covers over 3,600 acres, all zoned PM. The only foreseeable changes to the current land use are expansions of gypsum disposal areas and water storage areas.

The Mosaic-Farmland Chemical Plant and the CF Industries Chemical Plant located three miles to the east of the application parcels are both within PM FLUM areas. Together these two plants and the associated gypsum stacks, water storage and treatment areas, and lands reserved for future gypsum stack expansion cover more than 6,200 acres of PM FLUM area. The heavy investment in constructing, operating, and maintaining these chemical plant complexes would preclude a transition of these areas into other FLUM land uses.

The application parcels are located near the geographic center of the 12 gypsum stacks noted on the FDEP map. At one time there were also several beneficiation plants that refined raw phosphate ore and shipped it to the 12 surrounding chemical plants. These beneficiation plants and mines included the Achen Mine, Bonnie Mine, Holmes Mine, and American Agricultural Chemical Mine segregated out the clays, sands, and non-useable

materials and shipped ore to the various chemical plants by a rail system. The beneficiation plants shut down as the ore was depleted but the rail, roadway, and electrical transmission system established to serve the mines and plants remains in place. This application takes advantage of those public utilities and infrastructure that were constructed to support that portion of the phosphate mining, which has moved south.

The chemical processing portion of the phosphate industry continues to be located in and around the application area. The IND and BPC FLUM parcels located adjacent to the application area have many businesses located on them that serve the chemical plants and mining operations located in south Polk County and the surrounding Counties. These businesses include Southeast Construction, Scrappy Thomas, Kovacs Brothers, Roseman Electric, and Ring Power Corporation. These businesses located into this area to serve the clients in this area.

LINEAR PATTERN / LEAP-FROG RESPONSE

Because State Road 37, Old Highway 37, and the existing 2.8 miles of railroad track along the property run parallel in this area, the lands between the roads are inherently linear. Also, the topography in the general area will dictate linear development along the roadways, with undevelopable lands along the east and west sides. These existing site features are not a result of poor “linear planning” but proper design that utilizes all of the available developable upland, so that there would be no enclaves created within the project boundary.

As noted previously (due to the existing gypsum stack and chemical plant complexes), taking into account the unsuitable areas and the available areas, which have already been developed, there is very little developable land between the application parcels and the City of Mulberry. Nor are there much developable land between the application parcels and the large chemical complexes to the east and west. Therefore, the application parcels are more of an infill of existing developable land than sprawling or “leap-frogging” over any developable land areas.

PREMATURE DEVELOPMENT RESPONSE

There are no mathematical equations or guides within the county’s Comprehensive Plan or the LDC to calculate at what stage an Industrial development is determined to be premature or not; however, there is one section in the County’s LDC pertaining to Suburban Planned Developments that contains a timing guide to evaluate if the proposed SPD district’s development is premature. It states that such timing shall not be considered premature where the existing development of the surrounding area is sixty percent (60%) developed (of developable area) within a two-mile radius for parcels containing 100 or more acres. We applied the above concept to the following calculation, which resulted in the attached Figure 1 labeled “Surrounding Development Map”. In creating the map, the categories listed on the legend are explained in detail below.

Gyp Stack, Chemical Plant, & Monitoring – This includes gyp stacks, chemical plants, water recirculation storage discharge areas, closed gyp stacks and the mobil electro-phos elemental phosphorous plant north of Pebbledale Road.

Not Suitable (Mining Issues) – This includes mined out areas of the north prong floodplain, non-mandatory mined out areas, clay settling areas that will not be reclaimed in the next 20 years, reclaimed areas that are predominantly wetlands and reclaimed settling areas.

FEMA Flood Zone A - Shown on the map are those areas that are entirely FEMA floodplain with no mining ISSUES. These areas have substantial NWI wetlands on them as well. In any case, this only represents 2% of the Total Land.

Total land (2 mile radius) = 28.7 square miles
Non-developable area = 15.0 square miles

Developable area = 13.7 square miles
Developed land = 8.5 square miles

Developed land (8.5) / Developable area (13.7) = 62 % Developed

SPD criteria is 60% developed. By this criteria, the project would NOT be considered premature.

SEPARATION OF USES

Parcels originally requested BPC designation by applicant are located between the IND parcels and adjoining neighborhoods, and have been removed from the request. These buffering parcels provide a distinct separation between the uses.

RAIL / GREENHOUSE GASES RESPONSE

A major asset regarding the location of this site is the existing rail access and stacking yards. This infrastructure is already in place and usable. Raw materials and products can be transported in or out via rail, which will reduce the need for truck transportation on the roadways, thereby reducing greenhouse gas emissions, not increasing them.

OTHER

Natural resource protection and conservation issue responses are addressed under the “Site Suitability” Section.

Water and sewer issues responses are addressed under the “Public Facilities” Section.

Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC) Report: Need

The County has not demonstrated that it needs the additional business park, industrial, and residential uses in order to meet the projected needs of the County during the planning timeframe. According to the County Staff Report, the County is currently over allocated for Industrial and Business Park uses. Based on information provided with the amendment the County will require an additional 6,885 acres of Industrial and Business Park uses over the next 20 years to accommodate growth. The existing allocation of Business Park and Industrial uses within the County is already at 9,203 acres. Thus, a substantial over allocation of Business Park and Industrial uses already exists within the County. Also according to information provided with the amendment, the County is also currently over allocated for most residential uses and has not justified the need for the additional 216 residential units associated with the BPC portion of the amendment. According to information provided in the amendment, the County is over allocated for Residential High (845 percent of its 20 year allocation), Residential Medium (1,247 percent) and Residential Low (211 percent). Thus, the County has failed to justify the need for the additional business center, industrial, and residential development proposed for this site.

Sections 163.3177 (6)(a), (8), and (10)(e), F.S., Rules 9J-5.005(2), 9J-5.006(2)(b), F.A.C.

Applicant Response:

SIGNIFICANCE OF ALLOCATION TABLE

The county’s allocation of needs does not differentiate between BPC or IND land uses with rail access and without rail access. The county’s methodology of determining need does not take into account that some Industrial needs require a lot of space and others are more compact. Extra available acreage should be acquired in advance to use for economic development purposes. Acreage needs are typically based on population only. Industrial facilities that export goods, especially those with rail access (such as this site) should not be based on population, but on proposed development use. Therefore, it is not a matter of having “too much” available Industrial land.

As presented in the County’s EAR Report:

- 1) The county has a pro-active economic development program. In order to be more marketable to potential industrial prospects the County must have a variety of different industrial locations available. If Polk County cannot provide a site to adequately meet the needs of an industrial prospect, that business will go to another community this taking away potential new jobs for Polk County residents.
- 2) The amount of land needed for a particular industrial activity has a broad variance. One type of industrial activity may need 20 acres and employ 200 residents. Another industrial activity may need 200 acres but only employs 20 residents. Without more detailed analysis, a precise amount of industrial land cannot be determined, therefore flexibility is needed.
- 3) Polk County is very large. There are many different economic regions of the County. These regions vary by labor characteristics, resources, and market accessibility. Each one has different demands for industrial lands. The allocation model needs to allow flexibility so that there is ample variety of choice for a variety of potential industrial prospects in each different economic region.

CALCULATION OF ALLOCATION TABLE

Notwithstanding the above, the County previously listed the total number of acres of existing available BPC/IND at 9,203. This does not take into account FEMA acreages. Polk County reviewed the BPC/IND FLU lands throughout the county and determined the following area.

Future Land Use	Current Acreage	Un-Developed	Flood/NWI w/in Un-Developed	Remaining Un-Developed
BPC	11,311	5,192	1,885	3,307
IND	7,069	3,122	1,047	2,075
Combined Total	18,380	8,314	2,932	5,382

Based on current FLU, 2008 developed areas, 2000 FEMA Flood data, and current NWI

After accounting for both NWI wetlands and FEMA mapped floodplains, only 5,382 acres of BPC/IND are currently Remaining/Un-developed. Adding the applicant’s 300 acres of IND request would increase the available to 5,682 acres.

$$\frac{5,682 \text{ Acres [Available]}}{6,885 \text{ Acres [Needs]}} = \underline{82\% \text{ of Need}}$$

We looked at splitting out the IND from the combined BPC/IND category. Assuming that the current area total of the combined uses is representative, we would have:

$$\frac{\text{Current IND}}{\text{Current Combined}} = \frac{7,069}{18,380} = 38\% \text{ Current}$$

Calculation of % Need:

$$6,885 \text{ of combined Need} \times 38\% = 2,616 \text{ Acres of IND needed}$$

Using the 2,075 acres of IND available and adding the 300 acres of IND requested equals 2,375 available IND.

This gives a % of Need Ratio of:

$$\frac{2,375 \text{ Acres [Available]}}{2,616 \text{ Acres [Needed]}} = 91\% \text{ of Need}$$

So, using either a combined BPC/IND or a split IND only, would yield a % Need Ratio substantially below the 100% level, in the range of 80-90%.

RAIL ACCESS UNIQUE FEATURE

A unique feature of this site is that it has rail access and substantial rail stacking yards in place. While industrial sites may be near rail, very few of them actually have rail access. Figure 3 labeled, "Rail Access Determination Sites", was utilized to determine which industrial sites in the Southwest Polk County area had rail access and which did not. From the analysis, only 29% of the sites had existing or potential rail access (See Table 1).

We also reviewed the Polk County, Central Florida Development Council's website on Certified Sites to determine what percentage have rail access. Only 22% of the acreage listed for industrial sites are rail accessible (see Table 2).

From the analysis, it could be concluded that only 20-30% of industrial sites in Polk County are accessible by rail. Not only is rail access a unique feature of this site, adding the additional acreage will help satisfy the need in Polk County.

Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC) Report: Transportation

Although the existing land use has a higher FAR than the proposed land use, the misleading in the surrounding land uses are general agricultural or mine reclamation use, and the proposed land use, with more than 7 million square feet of business park and industrial uses, will have significant transportation impacts. The amendment is not supported data and analysis which indicates that adequate roadway capacity is available to serve the project site. According to the County Staff report, the amendment will generate 1,344 additional peak hour trips, exceeding the remaining capacity of the roadway system for SR 37 and Old Highway 37 which have a combined capacity of 1,264 peak hour trips. The amendment will consume all of the available capacity on these facilities, and is likely to cause degradation and LOS failures on both roadways. The site is also in close proximity to a recent 44-acre industrial comprehensive plan amendment (CPA-09A-04) which was part of the County's previous amendment Cycle. The

cumulative impacts of both amendments will be greater on the roadway network. The amendment does not identify its impacts on roadways and the planned improvements needed to address any identified roadway failures.

Sections 163.3177(2), 163.3177(3)(a)5, 163.3177(6)(a),(b)and 0,163.3177(8), 163.3177(10)(e), F.S., and Rules 9J-5.005(2), 9J-5.006(2), 9J-5.016(1)(a), 9J-5.016(2)(b) and (c); 9J-5.016(4)(a), 9J-5.019(3)(b), (4)(b)2., and (c)l., F.A.C.

Applicant Response:

TRAFFIC CAPACITY / GENERATION RESPONSE

The original County’s staff analysis and capacity figures quoted by DCA, assumed that the subject parcel did not have access to CR 640 due to the proximity of a rail over-pass. Upon a detailed review, we have determined that access to CR 640 is both practical and permissible.

CR 640 should be included in the available capacity is as follows:

<u>Roadway Segment</u>	<u>Direction</u>	<u>Available Capacity</u>
Old Highway 37	South	357
Old Highway 37	North	343
SR 37	South	261
SR 37	North	303
CR 640	East	137
CR 640	West	<u>232</u>

Total 1,633 PPHT Capacity

The BPC request has been withdrawn, therefore the 300-acre Industrial property generates only industrial trips.

300 Ac. X 0.5 (FAR) = 150 Ac. X 8.84 PPHT/Ac = 1,326 PPHT Generated

The project would, therefore, not exceed the available capacity for the combined roadway segments.

In addition, all of the parcels included in this project have rail access. The ITE manual for industrial does not differentiate between rail service and non-rail service, therefore yielding a higher trip rate on average. In contrast, the subject property is all served by rail. This project, therefore, would generate measurably less trips than shown above.

ADJACENT PROPERTY RESPONSE

Although CPA 09A-04 could add trips to the roadway segments, it is inappropriate to limit the available roadway capacity with the assumption that CPA 09A-04 will actually be developed concurrent with this project. The same could theoretically apply to all parcels located along the road segments in question. A proper analysis would not speculatively include other parcels, which are not part of the application.

Notwithstanding the above, if the other project, CPA 09A-04, is included, the combined properties still would not exceed the available capacity.

Adjoining property = 189 PPHT
Subject property = 1,326 PPHT
Total = 1,515 PPHT < 1,633 PPHT of Available Capacity

The only significant improvements needed by the project would be at the project entrances. The developer normally pays for these improvements. No roadway improvements are planned, nor are needed by this project; as the subject project does not exceed roadway capacity.

**Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC)
Report: Public Facilities**

The amendment is not supported by data and analysis which indicates that adequate sewer and water capacity are available to serve the project site. The amendment site is located in an area which has been designated in the County Comprehensive Plan as a Rural Development Area (RDA); RDAs generally are not serviced by sewer and water. Any development that occurs as a result of this amendment would be dependent on individual well and septic systems. According to information in the amendment, centralized sewer is not available or planned for this area in the near future. The site is also located within the Southern Water Use Caution Area and due to increased demands for potable water throughout the County, and lack of growth in the southwest region, the County has no plans to increase potable water or wastewater capacity in the area. Thus, the amendment is not supported by a demonstration of adequate water supplies as well as water and sewer facilities to serve the site.

Sections 163.3167(13), 163.3177(2), 163.3177(6)(a),(c), and (d), 163.3177(8), 163.3177(10)(e), F.S., Rules 9J-5.005(2), 9J-5.006(2), 9J-5.011(1)(a)-(f), (2)(b) and (c), 9J-5.013(1 and 2), 9J5.0 16(1)(a), 9J-5.016(2)(b),(c)(3)(b), 9J-5.016(4)(a), F.A.C.

Applicant Response:

CENTRAL SEWER / SEPTIC TANK IN RDA

The site is located in the Rural Development Area (RDA). Properties located in the RDA are not required to connect to centralized sewer or potable water. Central sewer is not planned for this area, but potable water is available.

Per Policy 2.108-A3: Land Use Categories: (c) Industrial is a land use category that is permitted within RDA. Clearly, the Comprehensive Plan envisions Industrial projects being constructed without centralized sewer, and therefore being served by private septic systems.

Reinforcing this, POLICY 2.113-A4: DEVELOPMENT CRITERIA: (d) The maximum floor area ratio for non-commercial uses within an Industrial area shall not exceed ... 0.50 in the RDA, unless developed as a Planned Development.

AND (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.

The Comprehensive Plan not only envisions septic tank usage for Industrial sites, it lists specific reductions in construction intensity to provide stronger environmental protection when septic tanks are proposed.

WATER-SEWER CAPACITY / GENERATION RESPONSE

WATER

Polk County Utilities has a twelve-inch potable water main along the east side of Old Hwy. 37 and adjacent to our site. The nearest water facility is the Bradley Junction Public Water System.

The PC staff report lists the required water use at 1,568,160 gallons per day (gpd). This was arrived at using one specified Industrial type use – Warehouse. The County has broader, more generalized Industrial categories listed on the “Flow Determination Sheet” that would more accurately predict the water demands for the project.

The sheet lists two categories. 1) “ Factory and Industrial Facility”-without showers and without industrial waste, which has a flow of 25 gpd per person; and 2) “Light Industrial” without industrial waste, which has a flow of 15 gpd per person. Averaging the two, gives 20 gpd per person.

A more accurate calculation of the water/sewer needs for the project would utilize these two categories as follows:

Industrial at 300 +/- acres.

Permitted density equals a FAR of 0.5. Or 0.5 x 300 ac = 150 ac or 6,534,000 sf.

Estimating the number of Employees per 1000 s.f. of Industrial using similar recently constructed Industrial / rail access sites in Polk County:

<u>Project Name</u>	<u>Bldg. sf</u>	<u># of Employees</u>
Aldi Foods	500,000 sf	80 employees
Cellynne	300,000 sf	200 employees
Griffin Fertilizer Plant	42,000 sf	20 employees
Total	842,000 sf	300 employees

Average equals 0.36 employees per 1,000 sf

Proposed Site:

6,534,000 sf X 0.36 emp / 1000 sf = 2,352 employees.

Water Need:

2,352 employees x 20 gpd per employee = 47,040 gpd.

Therefore, at build-out the project could require 47,040 gpd. (Build-out is estimated to take 15 years)

The project could require 47,040 gpd / 15 yrs. or 3,136 gpd per year.

For 5 years that equals a total of 15,680 gpd.

Currently the Bradley Junction Public Water system has 36,000 gpd of uncommitted capacity, operating at 68%, based on the Polk County Capacity Fact Sheet dated 4-1-2009; therefore there are sufficient capacity to serve this

project for the initial build-out period.

CENTRALIZED SEWER

Based on the more accurate calculated water demand numbers above, the sewer generation flows could be:
 $15,680 \text{ gpd} \times 80\% = \underline{12,544 \text{ gpd}}$.

The design, permitting and construction of individual septic systems, each having only a small portion of the 12,544 gpd, would be possible on this site.

Each industrial facility would be responsible to design and permit their required septic systems accordingly.

Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC) Report: Site Suitability

The proposed amendment will intensify development on the site which may be incompatible with the environmentally sensitive nature of the site. According to information supplied with the amendment, the site contains man made wetlands which were created as part of the reclamation design for the site. The North Prong Alafia River also runs adjacent to the site. The property owner and County have not conducted a detailed analysis of the site to determine the presence of threatened and endangered species. According to the staff analysis, more than seven biodiversity hotspots have been identified on site. The Florida Fish and Wildlife Conservation Commission has established that there are II occurring or potentially occurring listed wildlife species associated with the site. The amendment also indicates that an eagle's nest is known to exist on parcel I of the site. Because the County has no plans to service the area with sanitary sewer in the near future, development will be dependent on the use individual on-site septic systems. This may cause degradation of the aquifer and nearby surface waters. Thus it has not been demonstrated that the subject site is suitable for the proposed use. State law requires that land uses be appropriately coordinated with the environmental conditions of the site.

Section 163.3177(6)(a) and (d), F.S., Rule 9J-5.006(2)(b), (3)(b)1. and (c)l. and 6., 9J5.013(1)(a) and (b),(2)(b)3. and 4.,(2)(c)6., and (3)(a),(b), F.A.C.

Applicant Response:

Recent field surveys of the northern parcel, showed that most of the area mapped as "priority wetland" was not. Much of the eastern portion of the site was a pine-palmetto land cover vegetation association and much of the southern portion was cogon, Bermuda grass and smut grass, which are all upland species. There were a few small wetlands in the parcel, a small one near the center of the tract and one along the northern property boundary. Neither appeared to be a quality wetland. Along the southern property boundary there was an area that may be a wetland, but contained nuisance species such as both primrose willow and Mexican primrose willow.

Discussions with FWC staff responsible for generating the comments to DCA, indicated that the "priority wetlands" mapping is conceptual and that field staff had not field truthed the land use cover forms to determine the accuracy of the mapping.

The existing mapped wetlands and floodplains on the surrounding properties seem to be a by-product of the previous phosphate mining activities; they do not appear to be "natural" resources, but man-made clay settling areas. Should it be necessary, the extent of these wetlands can be delineated at a later date prior to Site Plan Review.

The applicant will design the project accordingly, abiding by all jurisdictional regulations and following current permitting requirements as stated in the county's Land Development Code.

**Department of Community Affairs (DCA) Objections, Recommendations and Comments (ORC)
Report: Recommendation for objection**

The proposed land use change for Amendment CPA 09B-04 is premature at this time and lacks the planning necessary to help create a viable and compact community. In view of this, the Department recommends that the County not adopt this amendments until such time as adequate public facilities are either in place, or planned to be place so as to prevent leap frog development in rural areas, and the degradation of environmental resources through habitat encroachment and proliferation of onsite sewage disposal systems. Also, the Department supports the County efforts to conduct a selected area study for former phosphate land, which comprises approximately 200,000 acres in the lower southeastern portion of the County. This effort will help determine the best use of the area as a whole, which is preferable to a series of future unplanned and uncoordinated piecemeal amendments to the comprehensive plan.

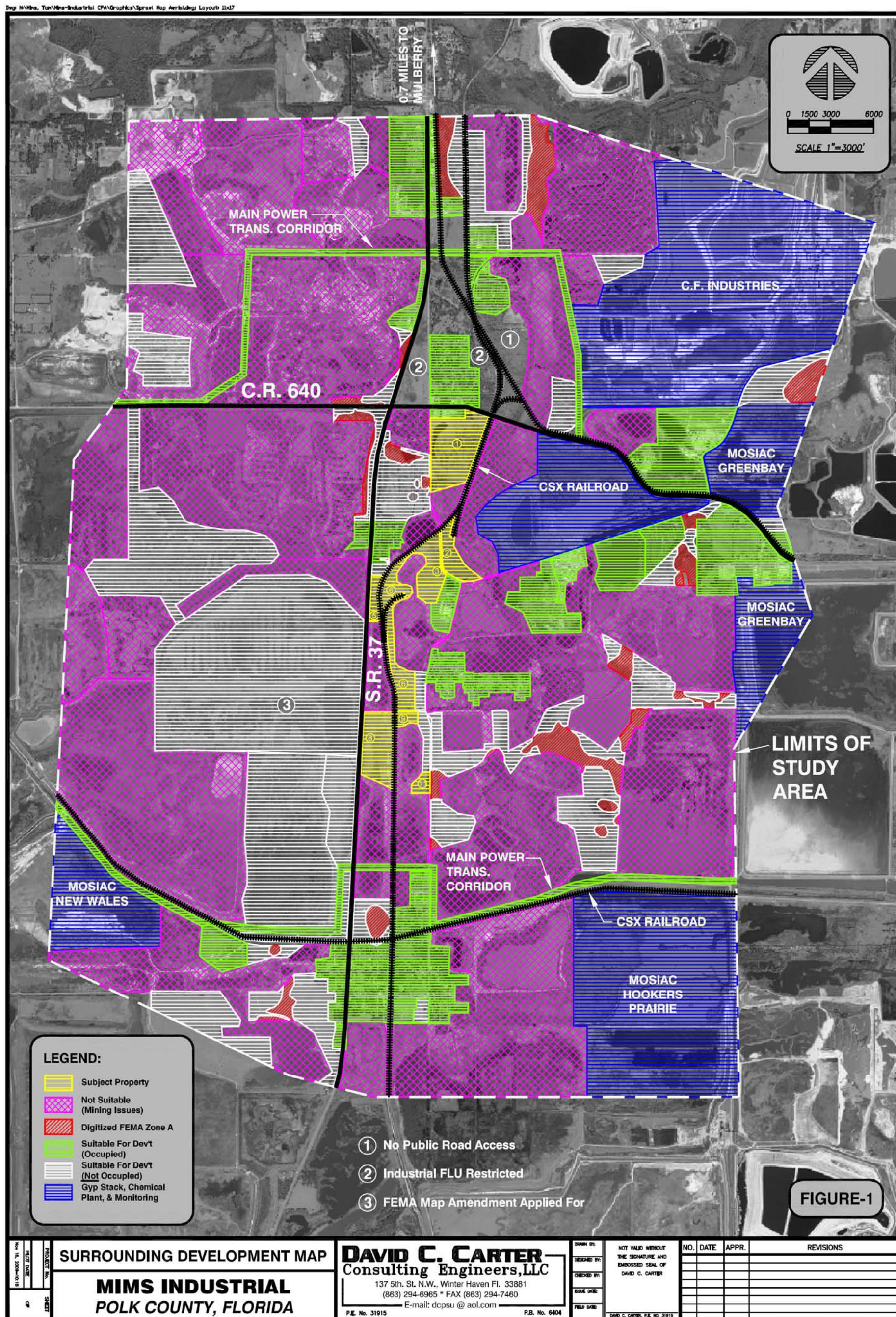
Applicant Response:

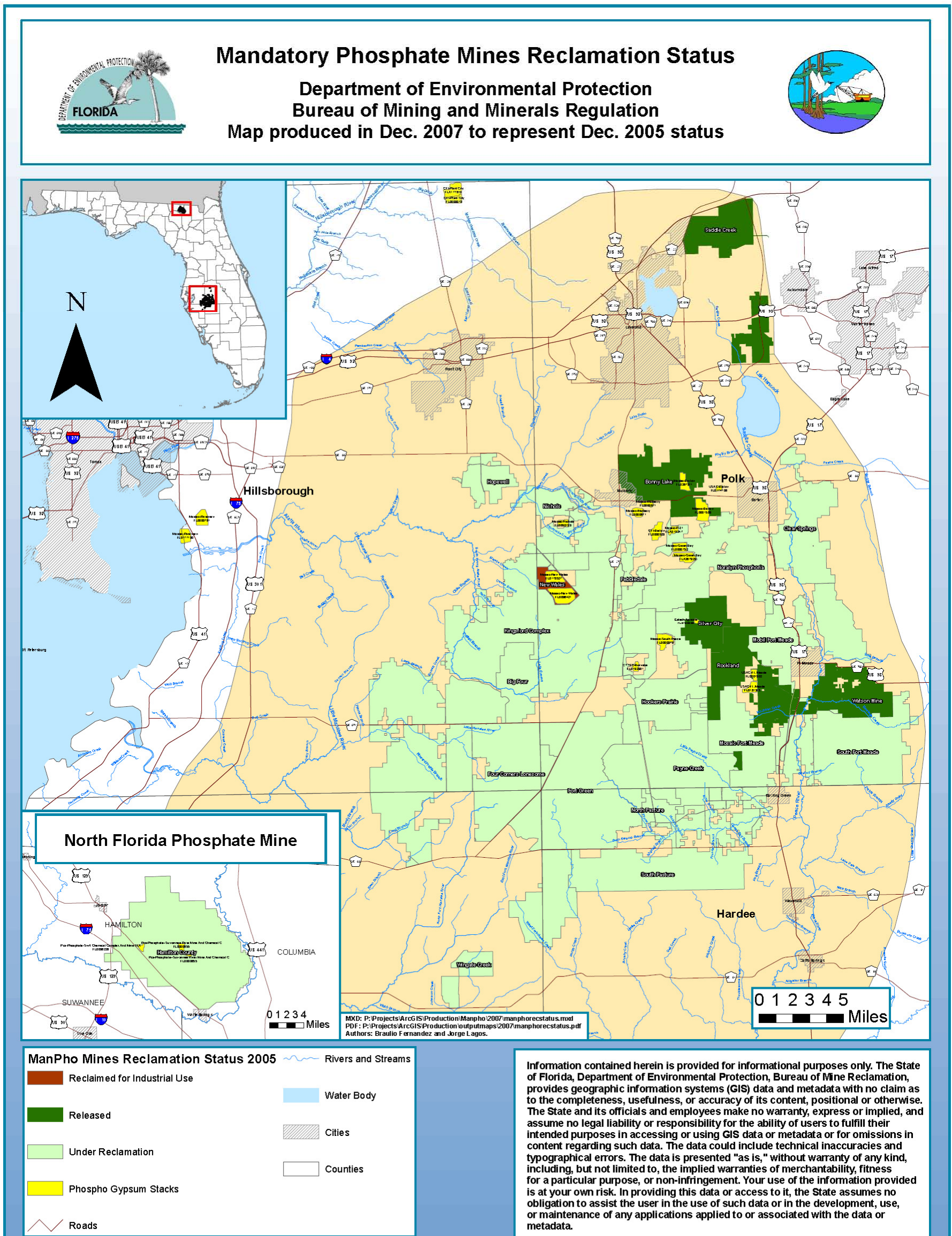
Per our analysis, the proposed request is not premature and would create a viable and compact community given the area demographics. Public facilities are not required in this RDA area, nor would it be feasible for the county to run sewer to the site, however adequate water capacity is available.

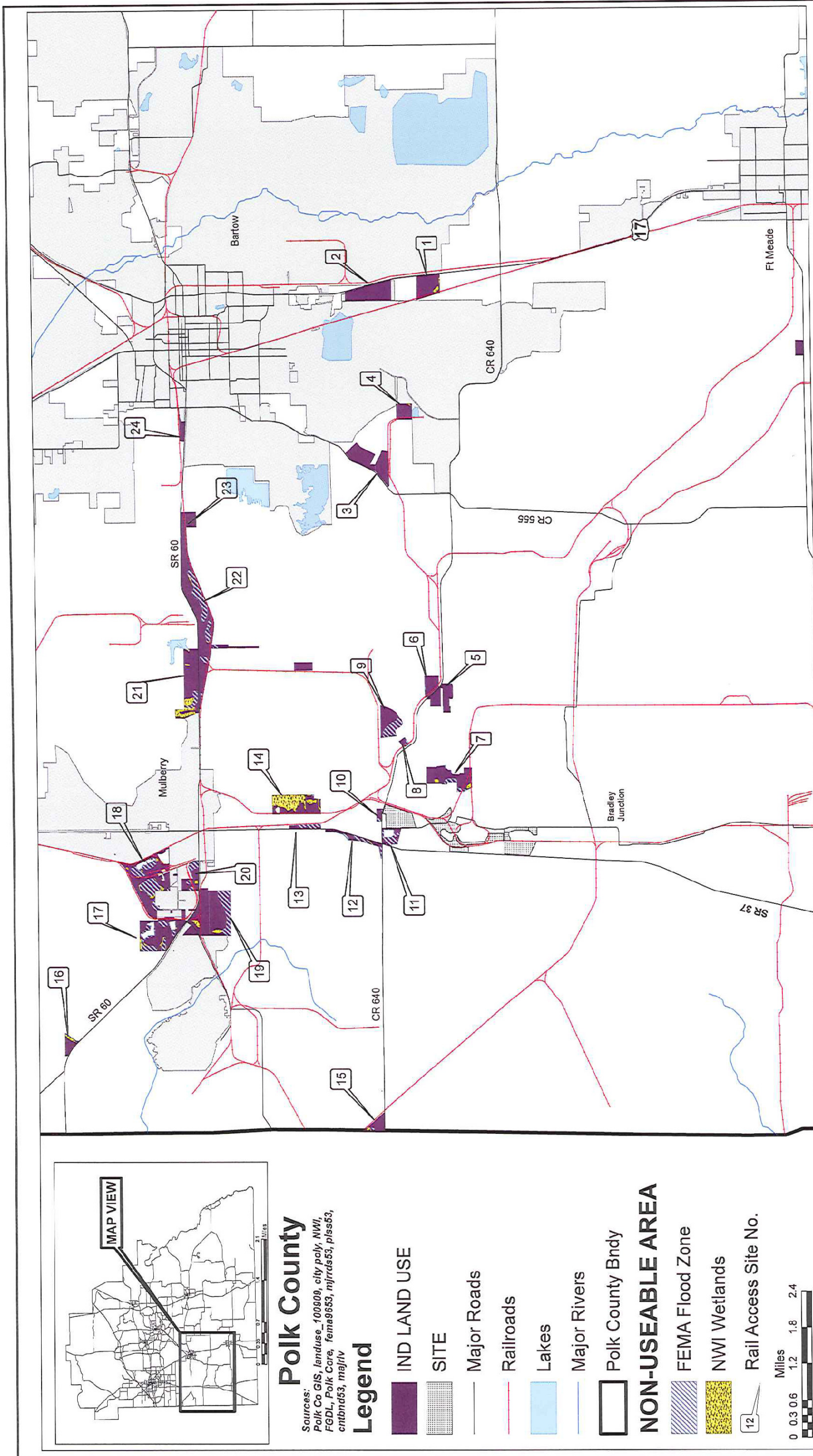
Existing development of actual developable lands in this area are above the 60% thresh-hold and the project site does not "leap-frog" any significant amount of developable land as demonstrated per the urban sprawl analysis.

Habitats or environmental resources, if any on-site, will be protected per code.

The applicant supports the county's selected area study, however, development within such area is not prohibited, nor halting development due to an ongoing study per previous similar situations is encouraged by the County Commission.







INDUSTRIAL LAND USE SITES
POLK COUNTY, FLORIDA

THE MIMS GROUP
 Comprehensive Plan Large Scale Map Amendment
 Unincorporated Polk County

Figure 3

RAIL ACCESS DETERMINATION SITES

Drawn By: **TMG**
 Checked by: **SK**
 Date: **11/05/2009**

Gurr Professional Services, Inc.
 Environmental Consultants
 202 Howard Street, Suite 100
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**TABLE 2 - CFDC CERTIFIED SITES - INDUSTRIAL
PERCENT RAIL ACCESS**

	Name	Property Size (Ac)	Building Size (sf)	Rail Access Y/N
1	Lakeland Central Park	838	5.6 million	No
2	Rockefeller Group of Commerce	113	1.2 million	Yes
3	CSX Integrated Logistics Center*	300	3.5 million	Yes
4	Access 4 Logistics Center	104	1.5 million	No
5	Central Commerce Center	64	898,000	No
6	Eagles Landing	55	310,000	No
7	Cabot Commerce Center	60	518,000	No
8	Ruthven Interstate Business Park	300	3 million	No
9	Landmark Commerce Center	48	750,000	No
10	Interstate Commerce Park	136	700,000	No
11	Four Corners Business Park	53	820,000	No
12	First Park of Haines City	130	1.5 million	No
13	First Park of Bridgewater	120	420,000	No
14	Tibbetts Holdings of St. Petersburg	55	700,000	Yes
15	Mancinni Development of Pompano	80	1 million	No
16	Frostproof Business Park	125	1 million	Yes
17	Haines City Commerce & Business Park	25	400,000	No
18	Winter Haven CommerCenter	32	350,000	No
19	Park 27	30	550,000	No

Total Area (Ac) 2,668

Rail Access (Ac) 593

Rail Access (%) 22%

Source: CFDC website on certified sites.

* Indicates land with FLU in place.

Staff Response:

The applicant has provided credible, substantive data and analysis to rebut DCA’s objections related to urban sprawl, need, transportation, public facilities and site suitability. These issues have been addressed in greater detail as compared to the original application. Staff, however, continues to have concerns regarding the compatibility of the proposed industrial land uses on Parcels 6 and 9. These parcels are located in close proximity to Pierce/Rolling Hills, and access to these parcels would be provided via Jamison Road, a local residential road.

Surrounding Land Use Designations and Current Land Use Activity:

Table 1

<p align="center">Northwest:</p> <p align="center">PM, IND, A/RR Oakdale/Oak Terrace Community(SFR) Mined lands , pasture, wetlands</p>	<p align="center">North:</p> <p align="center">PM, IND, BPC, A/RR Pinedale Community (SFR) Light Manufacturing, Mined lands , pasture, wetlands</p>	<p align="center">Northeast:</p> <p align="center">PM, IND, A/RR Pebbledale Community(SFR) North Prong Alafia River Mined lands , pasture, wetlands</p>
<p align="center">West:</p> <p align="center">PM and A/RR Oakdale Community(SFR) Mined lands , pasture, wetlands</p>	<p align="center">Subject Property:</p> <p align="center">PM Mined lands , pasture, wetlands</p>	<p align="center">East:</p> <p align="center">PM, IND, A/RR Pierce Community(SFR) Mosaic Admin Offices North Prong Alafia River Mined lands , pasture, wetlands</p>
<p align="center">Southwest:</p> <p align="center">PM Mined lands , pasture, wetlands</p>	<p align="center">South:</p> <p align="center">PM, RCC Bradley Junction Community(SFR) Mined lands , pasture, wetlands</p>	<p align="center">Southeast:</p> <p align="center">PM,IND, A/RR Pierce Community(SFR) Mined lands , pasture, wetlands</p>
<p>Source: Future Land Use Map, Site visit, GIS/IT Data Viewer - Polk County Long Range Planning Division</p>		

Compatibility with the Surrounding Land Uses:

A. Land Uses:

The site is located south of Mulberry on State Road 37, which cuts through the heart of the Phosphate Mining (PM) Land Use District in Polk County. The subject property as well as the majority of the immediate surrounding area is comprised of the Phosphate Mining (PM) Future Land Use designation. The purpose of the PM district is to provide areas for phosphate mining operations, phosphate mining support facilities, and other uses that are compatible with and related to phosphate mining and its allied uses. Current surrounding activities in the PM district include vacant mined land, clay settling ponds, pasture, and light manufacturing. Active mining and processing of mined materials has ceased in this portion of the PM district.

The proposed site is adjacent to two residential communities. Oakdale/Oak Terrace is located west of the site and Pierce/Rolling Hills is located east of the site. Two other communities are in close proximity to the site. These are Pinedale to the north and Bradley Junction to the south. These communities contain over 700 single-family residential lots. Although these communities have experienced mining operations, these activities were temporary in nature. The PM district surrounding these communities is now very rural in nature. IND uses adjacent to these residential communities will be in extreme contrast to the current rural environment.

The proposed Future Land Use designation may be considered incompatible with the neighboring residential developments. Industrial (IND) Future Land Use districts are characterized by facilities for the processing, fabrication, manufacturing, recycling, and distribution of goods, and may contain any use also found within a Business-Park Center (BPC) Future Land Use district. IND districts are also the appropriate location for land use activities that produce significant amount of noise, odor, vibration, dust, and lighting on and other off-site impacts. Below is a list of the permitted and conditional uses within the IND district according to Table 2.1 Use Table for Standard Land Use Districts within the Land Development Code (LDC).

Industrial (IND)	
Permitted uses	Agricultural Support, Off-Site, Animal Grazing, Animal Farming, Aquiculture, Dairies, Equipment Repair (Major), General Farming, Government Facility, Kennels, Livestock Sales, Manufacturing (Light, General and Explosives/volatile Materials), Motor Freight Terminal, Nurseries and Greenhouses, Office, Outdoor Storage (Wholesale), Personal Services, Printing and Publishing, Recreation (Low Intensity), Research and Development, School (Technical/Vocational, and Training), Studio Production, Transit (Commercial and Facility), Utilities (Class I and II), Vehicle Repair, Vehicle Service, Warehousing and Wholesale (Enclosed)
Conditional Uses Staff Review (C1 or C2)	Alcohol Package Sales, Bars/Lounge/Tavern, Breeding/Boarding/Rehab Facility (wild or Exotic Species), Communication Towers, Community Center, Convenience Store, Cultural Facility, Financial Institution, Gas Station, Heliport, Helistop, Hotel/Motel, Nurseries (Retail), Religious Institution, Restaurant, Retail (less than 50,000), Self-Storage Facility, Utilities (Class III), and Veterinarian Service.
Conditional Uses Planning Commission Review (C3)	Planned Development, Landfill (Construction and Demolition Debris), Mining (Non-Phosphate), Railroad Yard, Retail (greater than 50,000), Salvage Yard, School (Leisure, College/University), Seaplane Base, and Water Ski School.
Conditional Uses BoCC Review (C4)	Airport, Hazardous Waste Transfer Storage, Power Plants

B. Infrastructure:

The proposed land use change is located within the Rural Development Area (RDA). The applicant is proposing private wells and a septic system on-site which are permitted in the RDA. The overall roadway

network links servicing this area are adequate and are generally operating within or at their adopted Levels-of-Service, although the request would consume the majority of the available trips. The proposed site is adjacent to a railroad system and has access to transit services. Based on the permitted uses allowed within the IND Future Land Use, the demand for Sheriff's Office, Fire, and EMS services will increase in comparison to the existing uses associated with site.

Nearest Elementary, Middle, and High School

The Industrial (IND) Future Land Uses does not support permanent residency. Table 2 shows the closest schools, their current and projected enrolment, along with their percent of capacity.

Table 2

Name of School*	Permanent Capacity 2008-2009	Actual Enrollment 2008-2009	Projected Capacity 2010-2011	Capacity % **
Kingsford Elementary	427	576	427	134 %
Mulberry Middle-	797	880	951	110 %
Mulberry Senior	1281	961	1281	75 %
Source: Polk County School Board				
* The schools indicated here reflect the current zones and may be changed by the School Board.				
** The capacity will change depending on proposed DOE changes.				

Kingsford Elementary and Mulberry Middle are currently over capacity. Kingsford Elementary is land locked in such a way that prohibits expansion. The School Board has purchased a site for an elementary school on Bailey Road which would relieve Kingsford Elementary. Currently the School Board does not have funding in the five (5) year plan for the construction of a new elementary school. If residential was proposed for this site the development would be subject to school concurrency. Capacity improvements for Mulberry Middle are beyond the five year work plan.

Nearest Sheriff, Fire, and EMS Station

Table 3

	Name of Station	Distance from subject site	Response Time
Sheriff	Southwest District Office 4120 US Highway 98S, Lakeland	15 ± miles from district office	12-15 ± minutes
Fire	Station # 4 Bradley Fire Station 6449 Old Highway 37	2-3 ± miles	4-8 ± minutes*
EMS	ALS Station Mulberry 7 310 3 rd Street, Mulberry	4-5 ± miles	6-7 ± minutes*
Source: Polk County Sheriff's Office, EMS, and Public Safety; Response times vary depending on the type of call and location of patrolling service. *Response times are based on when the 911 call is received by the station not when the 911 call is made.			

Sheriff's Office services will be provided by the Southwest District Command. The command station is located at 4120 US Highway 98 South on the corner of the University of South Florida/Polk Community College off of US Highway 98 South in Lakeland. This station is approximately fifteen miles from the site

and the average response time to calls for service is approximately twelve to fifteen minutes. Sheriff Office response times are not as much a function of the distance to the nearest sheriff's station, but more a function of the overall number of patrol officers within the County. The nearest EMS station is the Mulberry EMS Station (ALS 7). This station is located approximately four to five miles away with a response time of six to seven minutes.

The Bradley Fire Station serves the Bradley Junction area, a remote area of southwest Polk County known for its power generation and phosphate industry. Back-up to the station comes from automatic aid partners including Mulberry Fire, Polk County Willow Oak fire station, or mutual aid from the cities of Fort Meade or Bartow. The Bradley fire station has been upgraded to 24 hour staffing with three career firefighters per shift, augmented by volunteer firefighters. The station is equipped with an engine, tanker and brush. Engine 4 was recently upgraded to paramedic level service with the addition of cross trained firefighters who provide advanced life support pre-hospital emergency care. Until all renovations at the station are complete, the firefighters will use the residence at 630 Main Street.

Water and Sewer Capacity and Service Provider:

A. Service Provider:

The site is located in the Rural Development Area (RDA). Properties located in the RDA are not required to connect to centralized sewer and potable water. The applicant will need to obtain the appropriate permits from the Polk County Health Department and the Southwest Water Management District to provide well and septic services to the site. The subject property is limited to a floor-to-area ratio of 0.50 because the subject property is located in the Rural Development Area (RDA). The Polk County Utilities and the City of Mulberry are the closest providers of water and wastewater services.

The site is partially located within the Polk County Utilities Southwest Regional Utility Service Area (PCU-SWRUSA). Specifically, the site is adjacent to Bradley Junction Public Water System. No central sewer is currently available or planned for this region.

B. Available Capacity:

Polk County Utilities has a twelve inch potable water main along the east side of Old Highway 37. The Bradley Junction Public Water System provides potable water and fire protection to the communities of Piece and Bradley Junction. The facility is currently operating at 70% capacity and potentially has approximately 20,000 GPD available for use.

Centralized sewer is not available in this area except for the community of Oak Terrace. The facility treats approximately 19,000 GPD, but does not have additional capacity for the proposed request.

According the PCU, development of large industrial parks or business parks should provide centralized wastewater treatment and effluent disposal in accordance with FAC 62-620. Geotechnical studies will be required to ensure that previously mined land is suited for wastewater effluent disposal or can be modified for such purposes.

C. Planned Improvements:

The site is located within the Southwest Florida Water Management District and the Southern Water Use Caution Area (SWUCA). Due to increased demands for potable water throughout the County, and lack of growth in the southwest regions, PCU has no plans to increase potable water or wastewater capacity in this area.

Table 4

Proposed Site IND = 300± ac.	Estimated Impact Analysis (Phosphate Mining / Industrial and Business Park Center)		
	Existing Land Use Density /Usage Allowed	Maximum Land Use Density / Usage with Proposed Request	Staff Recommendation (Parcel 1 = 92 acres IND)
Generation Rates	PM in RDA 0.75 FAR = 32,670 sf	IND in RDA 0.5 FAR or 21,780 sf	IND in RDA 0.5 FAR or 21,780 sf
Permitted Density/ Maximum Number of Lots	249 ac or 10,846,440 sf	150 ac or 6,534,000 sf	46 ac or 2,003,760 sf
Potable Water Consumption (GPD)	2,603,146 GPD	1,568,160 GPD	480,903 GPD
Wastewater Generation (GPD)	2,082,517 GPD	1,254,528 GPD	384,722 GPD
Source: Long Range Planning- Potable Water and Wastewater generation rates. GPD = gallons per day PM, IND and BPC: Potable Water = 0.24 GPD per sf; Sewer = 80% of water			

The generation rates also show that water and wastewater are not available to support the current land use with a build out of industrial type uses in the PM and that the IND request is a perceived reduction in consumption. It is important to note that although Table 4 includes the potential generation rate for the PM district, these numbers do not accurately portray the existing or future use of the PM district. Phosphate mining has already reached its peak and never developed at the intensity listed in the generation tables. The water consumption within the PM district will continue to decrease as mining and processing activities move further south into neighbouring counties.

Based on the permitted values and the maximum usage shown in Table 4 the request will generate a considerable need for potable water and waste waster services, which are not currently available or planned. The difference in the generation rates are based not on the type of uses allowed, but instead on the reduction in the floor-area ratio between the industrial uses allowed in the PM district and those allowed in the IND district. Concurrency for water, fire flow, and wastewater services will have to be met prior to Level II approval. Adequate potable water, fire flow, and wastewater capacity necessary to accommodate the development of this site is not currently available.

Roadways/Transportation Network:

A. Capacity:

The subject site has frontage on County Road 640 (CR 640), Old Highway 37 (Old 37), State Road 37 (SR 37), Pebbledale Road, and Jameson Road. The two main access roads are Old 37 and SR 37. The site has frontage along CR 640. This frontage may not be accessible due to the overpass and wetlands along the

frontage, although the analysis includes CR 640 as accessible. Old 37, SR 37, and CR 640 are monitored by the Transportation Planning Organization (TPO).

Table 5 indicates the roadway network segments directly impacted by the proposed request. Old 37 and SR 37 are currently operating at above the minimum adopted levels-of-service (LOS) and currently have additional capacity. CR 640 is operating at the minimum adopted level-of-service (LOS) with additional capacity. The data is provided by the Polk County Transportation Organization's (TPO) Roadway Network Database and has been revised based on the November 6, 2009 revisions. During this recording period CR 640 showed a significant increase in daily trips. Due to the unusual significant increase the TPO recalculated the available capacity based on historic growth rates for the road segment, which are shown in Table 5. Additional monitoring of the roadway is scheduled for the week of November 30, 2009 to determine if this was an anomaly.

Table 5

Link #	Direction	Road Name	Current LOS	Available Capacity	Minimum LOS Standard
4128	South	Old Highway 37 (CR 630 to CR 640)	A	357	C
4128	North	Old Highway 37 (CR 630 to CR 640)	A	343	C
5801	South	State Road 37 (SR 674 to 640)	B	286	C
5801	North	State Road 37 (SR 674 to 640)	B	236	C
4069	East	County Road 640 (Pinecrest Road) (Hillsborough County Line to SR 37)	C	131	C
4069	West	County Road 640 (Pinecrest Road) (Hillsborough County Line to SR 37)	C *	227 *	C

Source: Polk County Transportation Planning Organization, Roadway Network Database November 6, 2009 and * Growth Rate Analysis for CR 640.

Table 6 indicates the projected number of Average Annual Daily Trips (AADT) and Peak Hour Trips (PPHT) for both the existing land use designation of PM and proposed land use change of IND at maximum activity use. The PM and IND districts are both described as industrial park. The two main access roads (Old 37 and CR 37) have a combined available capacity of 1,222 trips. CR 640 has an additional 358 trips available for a total of 1,580 trips. The request includes the potential for 1,326 PPHT, which would consume the majority of the trips on these three roads.

In addition the roadway network has not yet absorbed the potential impacts to the IND site approved by the BoCC in June 2009. This site is located along CR 640 with intersections at SR 37 and Old 37. The site is shown in Exhibit 5 and displays the 43.63± acres site (CPA 09A-04). The maximum impact from this site could be 1,377 AADT and 189 PPHT.

The generation rates also show that both the PM district and the proposed request both have the potential to exceed the maximum capacity for the AADT. The tables also seem to indicate that the IND request is a perceived reduction in trip generation. Again, it is important to note that although Table 6 includes the

potential generation rate for the PM district, these numbers do not accurately portray the existing or future use of the PM district. Phosphate mining has already reached its peak and never developed at the intensity listed in the generation tables. The trip generation within the PM district will continue to decrease as mining and processing activities move further south into neighbouring counties. Also it is unlikely that the PM in this area would be re-mined, used for processing, or needed for allied industries.

Based on the permitted values and the maximum usage shown in Table 6 the request will generate a additional need for roadway trips, which are not planned. The difference in the generation rates are based not on the type of uses allowed, but instead on the reduction in the floor-area ratio between the industrial uses allowed in the PM district and those allowed in the IND district. The applicant will be required to submit a more detailed traffic study during the Level II process so that staff can evaluate the potential impacts caused by the proposed development upon submittal. Adequate trips necessary to accommodate the development of this site is not currently available.

Table 6

Proposed Site	Estimated Impact Analysis (Phosphate Mining / Industrial and Business Park Center)		
	Existing Land Use Density /Usage Allowed	Maximum Land Use Density / Usage with Proposed Request	Staff Recommendation (Parcel 1 = 92 acres IND)
IND = 300± ac.			
Generation Rates	PM in RDA 0.75 FAR = 32,670 sf	IND in RDA 0.5 FAR or 21,780 sf	IND in RDA 0.5 FAR or 21,780 sf
Permitted Density/ Maximum Number of Lots	249 ac or 10,846,440 sf	150 ac or 6,534,000 sf	46 ac or 2,003,760 sf
Average Annual Daily Trips (AADT)	15,715 AADT	9,467 AADT	2,904 AADT
PM Peak Hour Trips (PPHT)	2,202 PPHT	1,326 PPHT	408 PPHT
Source: Polk County Transportation Planning Organization (TPO) AADT and PM Peak Hour Trips trip generation assumptions for PM and IND are based on Industrial Park Industrial Park (ITE 130) = 63.11 AADT/ac and 8.84 Peak Hour Trips per acre			

B. Roadway Conditions:

Old 37 and SR 37 are both two lane roads that run north and south with the property located between the two roads. Old 37 is a two-lane undivided road classified as a major rural collector and SR37 is a two-lane undivided road classified as a minor arterial with uninterrupted flow due to minimal driveways. CR 640 runs west to east at the northern end of the site. CR 640 is a two-lane undivided road classified as a Minor Arterial with uninterrupted flow due to minimal driveways. The roads in this area are categorized as in transition between the rural and urban area. Signalized intersections are located where CR 640 connects with Old 37 and SR 37. The northern most end of the site is located at the intersection of CR 640 and Old 37. This signalized intersection includes both right and left turn lanes on to Old 37 from CR 640 and onto CR 640 from Old 37.

Based on the Polk County Road Inventory Database, Old Highway 37 (CR 630 to CR 640) is in fair condition and has a Pavement Condition Index (PCI) rating of four (4), which means that the road is good structurally, but needs some repairs. The road width is twenty-two (22) feet from edge of pavement to edge of pavement

for Old Highway 37. Some areas have shoulders extending the width to twenty-four (24) feet. State Road 37 is a state maintained road and the County does not collect data on road conditions. The road width varies along the project width from thirty-two (32) feet at Jamison Road to forty-one (41) feet at Oak Terrace with shoulders. CR 640 (Hillsborough County Line to SR 37) is good condition has a PCI rating of six (6), which means the road is in sound structural condition, but show definite signs of aging. The road width for CR 640 is thirty-eight (38) feet from edge of pavement to edge of pavement where there are turn lanes, otherwise generally the width is twenty-four (24) feet with shoulders.

Other roads in the area include Jamison Road, Williams Street, Magnolia Avenue, and Pebbledale Road. Jamison Road runs east to west near the southern end of the site. The Road width varies for twenty (20) to twenty-three (23) feet. The road is in good condition with some shoulder where the width is greater. Williams Street and Magnolia Avenue are entrance roads into the adjacent communities of Pierce and Oak Terrace, respectively. Williams Street is twenty (20) feet wide in fair to good condition, and Magnolia Avenue is eighteen (18) feet wide in fair condition.

The Lakeland Area Mass Transit District Rout 37S runs along Old Highway 37 and has a 60 minute head way. The route runs from the Wal-Mart in Bartow to Bradley Junction with stops in Pinedale and Pierce.

C. Planned Improvements:

Currently, there are no additional planned improvements for the surrounding roadways as described in Table 5. Table 6 demonstrates the maximum transportation impact based on the developable acreage for each land use. As demonstrated in the table, the request has a great potential of impact on the roadway network. In the 2030 Long Range Transportation Plan, SR37 from CR640 to SR 60 is shown as an unfunded need to widen the road from 2 to 4 lanes.

Environmental Conditions:

The prior mining and reclamation activities on-site have significantly altered most of the natural soils, wetlands, vegetation, floodplain, and wildlife habitats. The existing wetlands on-site are all man-made as part of the post reclamation design. At this point in time all mining activities have been permanently shut down on the site by the mining company (IMC/ Mosaic) and portions of the site have been released from reclamation obligations. The conceptual post-reclamation design is shown in Exhibit 6.

A. Surface Water:

There are surface waters on-site associated with the North Prong Alafia River. The river runs adjacent to the site. Generally the surface water flows to the wetland features in the post reclamation design. These wetland areas are shown in Exhibit 6 and are generally green. Parcel 1 flows south with a waterbody feature on the west side of the parcel. Parcel 2 generally flows eastward into the North Prong Alafia River tributary. Parcel 3 generally flows south to north and south to west into the wetland between parcel 3 and 6. Parcel 5 flows south into the wetland off-site. Parcel 6 generally flows east ward, but at the south end flows north into the same wetland. Parcel 8 flows southward. Parcels 9, and 11 flow into the same wetland with parcel 9 generally flowing south and parcels 11 flowing west.

B. Wetlands/Floodplains:

The wetlands and floodplains are shown in Exhibit 7. Generally the post-reclamation wetlands have been carved out of the proposed land use change. The remaining wetlands are located on Parcel 1. These wetlands are associated with the Integrated Habitat Network ("IHN") plan. While a portion of the wetlands were removed from the original request, it would be more appropriate for the remaining wetlands to be removed from Parcel 1. The environmental conditions on and near this portion of the site supports a habitat conducive to the presence of protected plant and animal species. The applicant stated that this parcel was not completely mined due to an eagle's nest and the floodplains for the North Prong Alafia River. The reclaimed lake and wetland system were created to mitigate for environmental losses due to mining. Another option is to considering the Preservation (PRESV) Future Land Use Designation for the large areas of wetlands, floodplains, and IHN areas. This could also create a natural buffer between the proposed development and the existing residential communities.

The Bureau of Mine Reclamation ("BMR") developed the Integrated Habitat Network ("IHN") plan to acts as a guide for the reclamation of mined lands and the enhancement of unmined lands within the southern phosphate district. With appropriate management, the IHN lands are expected to improve wildlife habitat, benefit water quality and quantity, and serve as connections between river systems in the mining region and significant environmental features outside the mining district. This management plan was developed to coordinate basic management activities for long-term protection of the greenways/wildlife corridors, wildlife habitat, and riparian buffers within the Integrated Habitat Network. The IHN was developed to be compatible with and is part of the Florida Statewide Greenways Plan. In keeping with the tenets of the Greenways System Implementation Plan and its enabling legislation, participation in the IHN concept is strictly voluntary. The BMR has been the leading force behind the presentation of the IHN concept to the public, industry, and other agencies to foster understanding, cooperation, and participation in the program. Through the BMR's efforts, the concept has gained wide acceptance and virtually unanimous implementation in the industry.

The majority of the floodplain is designated as Special Flood Hazard Zone A, which corresponds to the 100-year floodplain. Because detailed hydraulic analyses have not been performed in this area, no base flood elevation or depths have been established. Development in these areas would be required to provide a base flood and floodway study to ensure that new structures are built above the floodplain elevation to reduce the loss of life and property.

C. Wells (Public/Private):

The site does not fall within a Wellhead Protection Area. According to the applicant, there are private wells in the area that provide potable water to the site. All production and irrigation wells were removed as part of the reclamation process. A remaining production well is maintained on an adjacent parcel by the Mosaic Company for their administrative offices (Intersection of Old Highway 37 and Pebbledale Road). The other adjacent industries are assumed to be on private wells since they are not within the Polk County or City of Mulberry Service areas. Polk County Utility Production wells (Rolling Hills West and Bradley Junction) are located near the site to serve the communities of Pierce and Bradley Junction. Details on the public potable water wells on-site are detailed in the Water and Sewer Capacity and Service Provider Section of the Staff Report.

D. Airports:

The site is not located within an Airport Impact District (AID).

E. On-Site Soils Per Polk County Soil Survey

The soils on-site have been mined, reworked and are no longer in their original state. The Polk County Soil Survey was published in 1985 and may characterize some areas correctly, while other areas that have been reclaimed more recently may be inaccurately described. Exhibit 8 shows the soils labeled by Soil Id and Table 7 includes the hydrogroup, percent coverage, and how appropriate the soil is for basements and septic tanks. Fill material or overburden has been added in wet areas to alleviate water problems, or soil material has been excavated to blend with the surrounding landscape. The application states that much of the reclamation was achieved with overburden. The soil conditions, the ability to engineer the site, and cost will be a major factor in the development of this site.

Table 7

Proposed Site (300 ± acres)					
Soil Id	Hydro-group	Soil Name Proposed Land Use	% of Site	Dwellings Without Basements	Septic Tank Limitations
105007	B/D	POMONA FINE SAND	40.5	Severe: wetness	Severe: ponding, percs slowly
105012	A	NEILHURST SAND 1 TO 5 % SLOPES	17.1	Severe: wetness	Severe: seepage
105023	B/D	ONA FINE SAND	14.7	Severe: wetness	Severe: wetness, poor filter
105016	UND	URBAN LAND	12.5	Not rated	Not rated
105014	C	SPARR SAND 0 TO 5 %SLOPES	4.7	Moderate wetness	Severe: wetness, poor filter
105068	C	ARENTS 0 TO 5 %SLOPES	3.5	Slight	Moderate: wetness
105017	B/D	SMYRNA AND MYAKKA FINE SANDS	3.1	Severe: wetness	Severe: wetness, poor filter
105057	D	HAPLAQUENTS/CLAYEY	0.2	Severe: ponding, shrink-swell	Severe: ponding, percs slowly
105047	C	ZOLFO FINE SAND	0.7	Moderate wetness	Severe: wetness, poor filter
105025	D	PLACID AND MYAKKA FINE SANDS DEPRESSIONAL	0.4	Severe: ponding	Severe: ponding, poor filter
105058	UND	UDORTHENTS EXCAVATED	0.4	Not rated	Not rated
105033	D	HOLOPAW FINE SAND DEPRESSIONAL	0.3	Severe: ponding	Severe: ponding, poor filter
105008	D	HYDRAQUENTS/CLAYEY	0.2	Severe: ponding, shrink-swell	Severe: ponding, percs slowly

Source: Polk County GIS and Soil Survey of Polk County, Florida (1986)

According to the Soil Survey of Polk County, the majority of the site is comprised of Pomona Fine Sand with less amounts of Neilhurst sand, Ona fine sand, and urban land. Other soils are found in quantities of less than

10% on the site. All of the soils are listed on Table 7. Pomona Fine Sand has severe limitations for urban development due to wetness. To overcome the problems caused by severe wetness of Pomona Fine Sands caused by wetness on sites for buildings or local roads and streets, a drainage system can be installed to lower the water table or fill material can be added to increase the effective depth to the high water table.

Soil conditions and surrounding impervious cover will play a roll in limiting development as well. Review of the soil hydrogroup shows the general characteristics of the soil types and their development limitations. The soil hydrogroups are shown on Exhibit 8. Approximately 60 % of the soils have limitations for development, since they are classified as B/D or D.

F. Endangered Habitat

According to the 2002 Florida Natural Areas Inventory (FNAI), the site contains and is located within a one mile radius of an endangered animal habitat and consists primarily of endangered plant, animal and communities. The Florida Fish and Wildlife Conservation Commission (FWC) have identified seven or more focal species biodiversity hotspots associated with the site. The FWC also has records of wading bird rookeries in the area. Although, the applicant has not completed an endangered habitat or species analysis, the application indicated that an eagle's nest was located on parcel 1. The Florida Department of Environmental Protection (FDEP) Bureau of Mine Reclamation (BOMR) has also noted that the eagle's nest remains located on Parcel 1. Due to the proximity to protected species a qualified professional will be required to conduct a site walkover and provide a protected species inventory list prior to any land development.

Park Facilities:

A land use change from PM to IND should not have an impact on the need for additional park facilities within this area.

Economic Factors:

The proposed land use change could help boost the local economy by providing employment opportunities in the southwest portion of Polk County and may provide spin off employment opportunities throughout the county. The proposed land use change could facilitate development that creates jobs that are above the average full-time employee in Polk County. Moreover, the proposed land use change could increase the tax base for Polk County as expenditures towards school and park facilities are negligible when developing industrial and/or commercial uses when compared to non-commercial uses. The proposed IND land use also allows for a variety of uses when compared to uses in the PM land use, although the typical IND uses will be limited by the lack of potable water and wastewater services. In the PM land use, development is limited to uses associated with phosphate mining activity.

Consistency with Comprehensive Plan:

The site is located on land that has been previously mined and reclaimed with a Future Land Use designation of Phosphate Mining (PM). It is expected that the PM lands in Polk County will begin to transition into alternate uses as the mining industry moves south. This transition needs to be evaluated and coordinated. Staff has analyzed the following Comprehensive Plan Policies in reviewing this request:

Section 2.102 of the Polk County Comprehensive Plan addresses the compatibility, distribution, timing, development policies and standards, topography considerations, soils, public facilities and utilities, location criteria, and Urban Sprawl criteria for development within unincorporated Polk County. In addition, the specific characteristics, location criteria, and development criteria were reviewed for each proposed Future Land Use district.

- *POLICY 2.102-A1: 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.*

The Future Land Use proposal is requesting IND next to Agriculture/Residential-Rural (A/RR). The A/RR districts contain the communities of Oakdale/Oak Terrace, Pierce/ Rolling Hills, Pinedale, and Bradley Junction which are occupied by single-family residences and contain over 700 lots. The applicant has made the argument that the PM district allows the same intense IND uses. Although these communities have experienced the impacts of mining operations, these activities were temporary in nature and are decreasing in quantity in Polk County as the mining industry moves south. Phosphate mining has already reached its peak and never developed at the intensity allowed nor did it develop with high amounts of allied uses. The PM district surrounding these communities is now very rural in nature and it is extremely unlikely the PM in this area would be re-mined, used for processing, or needed for allied industries. Therefore, PM is not the same intensity as IND. Also there are many other Future Land Uses districts that could serve as a transition between the rural residents to an industrial type use. When evaluated as a whole the 300 acres of IND could have a substantial impact to the surrounding communities such as noise, traffic, odor, vibration, dust, and lighting on and other off-site impacts. When evaluated as individual parcels, Map ID 1 and 8 would have the least impact on the surrounding communities.

- *POLICY 2.102-A3: 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-A9: 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 are not limited to:*
 - 1. *transportation facilities;*
 - 2. *sanitary sewer and potable water service;*
 - 3. *storm-water management;*
 - 4. *solid waste collection and disposal;*
 - 5. *fire protection with adequate response times, properly trained personnel, and proper fire-fighting equipment;*
 - 6. *emergency medical service (EMS) provisions; and*
 - 7. *other public safety features such as law enforcement;*
- f. *environmental factors, including, but not limited to:*
 - 1. *environmental sensitivity of the property and adjacent property;*
 - 2. *surface water features, including drainage patterns, basin characteristics, and flood hazards;*
 - 3. *wetlands and primary aquifer recharge areas;*
 - 4. *soil characteristics;*
 - 5. *location of potable water supplies, private wells, public well fields; and*
 - 6. *climatic conditions, including prevailing winds, when applicable.*

This application has several timing and location issues that are associated with each other. First the infrastructure is not in place at this time to support such a large Industrial district. The potable water, fire water, and wastewater facilities are not available to support the development. The scale of the development would also consume the majority of the available trips on the access roads (Old 37, SR 37, and CR 640). Without upgrades to the intersection there is also the possibility of additional accidents and reliance on emergency services. Although the generation tables seem to indicate that the IND and BPC request is a reduction in infrastructure demand, it is important to note that numbers do not accurately portray the existing or future use of the PM district. Phosphate mining has already reached its peak and never developed at the intensity listed in the generation tables. The infrastructure needs within the PM district will continue to decrease as mining and processing activities move further south into neighbouring counties. Also it is unlikely that the PM in this area would be re-mined, used for processing, or needed for allied industries.

In addition, there are no plans to increase the capacities for these infrastructure services. The amount of available developable IND in the County is over 2,000 acres. In addition to that a 44 ± acre parcel was recently approved adjacent to the site. Finally, the applicant has stated that the facility would support the proposed CSX Integrated Logistics Center. The County is performing a Selected Area Study (SAS) to determine areas for appropriate land use changes to support the center and ensure proper growth CSX Integrated Logistics Center, as well as an SAS on the PM Future Land Use districts within the County.

- **POLICY 2.113-A3: LOCATION CRITERIA** — *Industrial development within the County shall occur within lands designated as Industrial on the Future Land Use Map Series. The following factors shall be taken into consideration when determining the appropriateness of establishing new Industrial areas:*
 - a. *Industrial development shall be located within an Urban-Development Area Urban-Growth Area, Suburban-Development Area, Rural-Development Area, or Utility-Enclave Area. [Revised by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06]*

- b. *Accessibility to major air and ground transportation, including but not limited to arterial roadways, rail lines, and cargo airport terminals. [Revised by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06]*
- c. *The locational criteria enumerated in Policy 2.102-A9 and Policy 2.109-A10. [Revised by CPA-99B-15 (Ord. 99-71); Adopted by BoCC 15 DEC 99]*
- d. *Industrial facilities should group together in planned industrial districts on sites capable of being expanded and developed in stages.*
- e. *Industrial districts shall be separated significant distances from schools and developed residential areas through a combination of physical separation and screening and/or buffering in accordance with standards in the County's Land Development Code. [Revised by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06][Revised by CPA2002A-02 (Ord. 02-90); Adopted by BoCC 18 DEC 02]*
- f. *The location criteria for Industrial Districts shall serve to maximize access to the arterial road system and minimize the routing of commercial traffic through residential areas by requiring access be limited to [Added by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06]:*
 - 1. *arterial roads;*
 - 2. *collector roads, if the subject parcel is within ½ mile of an intersecting arterial road; or*
 - 3. *local commercial roads or private roads under the following conditions:*
 - (a) *the road has full median access onto to an arterial road;*
 - (b) *the road does not serve existing or expected future residential traffic from the surrounding area;*
 - (c) *the road has a structural integrity and design characteristics suitable for truck traffic.*
- g. *Applications for establishment of an Industrial district shall include a plan consistent with Policy 2.110-L5. [Added by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06]*

Map ID 1 meets the most location criteria for the Industrial Future Land Use designation (a, b, d, and f). This includes items such as access to rail, grouped near IND, and the road access. Items that that the sites does not meet are the Polices in 2.102 (in previous bullet) and the application did not address the Policies in 2.110-L5. This Policy addresses the Activity Plan requirements, which at a minimum include addressing land uses designations for all property within the center, development criteria, development restrictions (if appropriate), traffic circulation plan, special transportation restrictions (if appropriate) and the identification of environmentally sensitive lands and endangered natural communities and outline proposals for the preservation and/or conservation of these areas. This policy helps address issues for large developments or developments that can have impacts beyond the adjacent properties.

Map ID 8 meets some of the location criteria for the Industrial Future Land Use designation (a, b, and f). This generally meets the same criteria as Map ID 1, except that it is not grouped near existing IND. Items that that the sites does not meet are the Polices in 2.102 (in previous bullet) and the application did not address the Policies in 2.110-L5. This Policy addresses the Activity Plan requirements, which at a minimum include addressing land uses designations for all property within the center, development criteria, development restrictions (if appropriate), traffic circulation plan, special transportation restrictions (if appropriate) and the identification of environmentally sensitive lands and endangered natural communities and outline proposals for the preservation and/or conservation of these areas. This policy helps address issues for large developments or developments that can have impacts beyond the adjacent properties.

Map IDs 2, 3, 6, and 11 meet the least of the locational criteria for the Industrial Future Land Use designation (a and b). Items that that the sites does not meet are the Polices in 2.102 (in previous bullet) and the

application did not address the Policies in 2.110-L5. This Policy addresses the Activity Plan requirements, which at a minimum include addressing land uses designations for all property within the center, development criteria, development restrictions (if appropriate), traffic circulation plan, special transportation restrictions (if appropriate) and the identification of environmentally sensitive lands and endangered natural communities and outline proposals for the preservation and/or conservation of these areas. This policy helps address issues for large developments or developments that can have impacts beyond the adjacent properties.

- **POLICY 2.113-A4: DEVELOPMENT CRITERIA** —[Revised by CPA-97B-07 (Ord 97-49); Adopted by BoCC 18 NOV 97]; [Revised by CPA-99B-02 (Ord. 99-63); Adopted by BoCC 15 DEC 99]; [Revised by CPA2002B-15 (Ord. 02-106) Adopted by BoCC 18 Dec 02] *Development within an Industrial area shall conform to the following criteria:*
 - 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. [Revised by CPA2002A-02 (Ord. 02-90); Adopted by BoCC 18 DEC 02]*
 - 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.*
 - 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.*
 - d. *The maximum floor area ratio for non-commercial uses within an Industrial area shall not exceed 0.75 in the UDA, 0.65 in the UGA, 0.50 in the SDA, and 0.50 in the RDA, unless developed as a Planned Development. [Revised by CPA2002A-02 (Ord. 02-90); Adopted by BoCC 18 DEC 02]*
 - 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.*
 - 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. [Created by CPA2002A-02 (Ord. 02-90); Adopted by BoCC 18 DEC 02]*
 - 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 UDA and UGA. The Land Development Code shall establish development standards and criteria for Planned Developments within the Industrial district.*
 - 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. [Added by CPA-06A-05 (Ord. 06-041); Adopted by BoCC 26 JUL 06]*

The site (Parcel Id 1-3, 5-6, 8-9, and 11) has the potential to meet most of the development criteria for IND. Most of these items would be addressed during a Level III or Level II review.

In Addition, both Rolling Hills and Bradley Junction are designated as Redevelopment Districts per Policy 2.124-F. These areas are shown in relation to the proposed site in Exhibit 10. The Rolling Hills district is adjacent and contains a portion of the site, while the Bradley Junction district is located south of the site. The districts are intended to:

- utilize a comprehensive, strategic approach to identify the special needs of unincorporated communities comprised of predominantly low and moderate income residents;
- involve neighborhood residents in every phase of the planning process;
- develop action plans to meet the identified needs including, but not limited to, social and community services, infrastructure, transportation, economic development, law enforcement, and affordable housing;
- promote an enhanced living environment for the community, and a higher quality of life for community residents;
- promote the economic vitality of the community through the development of employment and business opportunities for community residents;
- encourage multi-modal transportation options, particularly pedestrian and bicycle travel; and
- encourage community cohesion by promoting opportunities for the interaction of community residents, thereby engendering community pride, empowerment of residents, identification with, ownership of and participation in revitalization efforts, and a "sense of place."

The Redevelopment District Revitalization Plans shall contain strategies developed with public input from those areas affected to preserve, rehabilitate, revitalize, and/or redevelop those areas. These strategies shall include, but not be limited to:

- a. targeting housing rehabilitation and code enforcement activities within designated Redevelopment Districts;
- b. removing dilapidated structures to create space for infill development;
- c. coordinating infrastructure improvements with rehabilitation and redevelopment activities;
- d. providing economic opportunities and neighborhood support services to encourage economic independence and self-sufficiency of residents;
- e. implementing programs to facilitate the development of affordable housing;
- f. developing special incentives, provisions, restrictions, or requirements in order to ensure that redevelopment and revitalization activities occur in accordance with sound planning principles and local community objectives;
- g. encouraging design features which promote public safety, create inviting streetscapes along public roadways, and emphasize a pedestrian-oriented environment;
- h. developing or providing incentives for development of needed community facilities such as neighborhood centers, day care centers, churches, schools, and community-oriented policing substations; and
- i. most importantly, empowering residents so as to rekindle community pride and developing lasting partnerships between government and the community.

- ***POLICY 2.124-F4: REDEVELOPMENT ACTIVITIES*** -- *Redevelopment District Revitalization Plans shall implement the purpose and intent of Policy 2.124-F1 and shall conform to the following requirements: [Policy revised by CPA-96A-16 (Ord. 96-58);Adopted by BoCC 03 DEC 96]*
 - a. ***PERMITTED USES:*** *In keeping with the purpose and intent of this section, the following uses may be permitted within a Redevelopment District Revitalization Plan:*
 1. *Residential (single-family and multi-family)*
 2. *Commercial*
 3. *Institutional*
 4. *Recreation and Open Space*
 5. *Preservation*
 6. *Specialized Uses, subject to the provisions of Section 2.125*
 - b. ***DEVELOPMENT CRITERIA:***
 1. *Non-residential uses should be limited to a size, scale, and intensity necessary to provide the residents of the community and surrounding area with retail, personal, and community services. Where permitted by the Redevelopment District Revitalization Plan, non-residential uses may include, but are not limited to, grocery stores, personal service shops, gas stations, restaurants, specialized and general retail, medical and professional offices, and community facilities such as neighborhood centers, churches, schools, community-oriented policing substations, and day care centers.*
 2. *Non-residential uses should be centrally located within the community and within comfortable walking distance for a majority of the area's residents.*
 3. *Non-residential uses shall have direct access to a collector or arterial roadway.*
 4. *The Redevelopment District Revitalization Plan shall ensure that gross densities of the residential portions of the revitalization area do not exceed the densities permitted for the residential district within which the revitalization area is located. Appropriate mixes of housing types shall be permitted where such mixes will be compatible with immediate adjacent existing residential development.*
 5. *Commercial & office uses shall be permitted in Redevelopment District Revitalization Plans. Redevelopment District Revitalization Plans may include up to 10% of the total area of redevelopment district for commercial and office uses. Designation of an area exceeding the additional 10% shall require a Comprehensive Plan amendment.*
 6. *It is fundamental to all revitalization plans that commercial uses, if included in the land use design, shall be oriented toward the historically established town center, main street, or placed in isolated neighborhood market sites that are restricted to a very limited scale of commercial activity and located only at the intersection of major collector roads. Linear commercial development shall not be allowed, unless it is clearly evident that it is consistent with the traditional development pattern of the community.*
 7. *Appropriate buffering shall be provided between non-residential uses and residential uses.*

As part of the Phosphate Mining SAS the Redevelopment Districts along Old Highway 37 will be evaluated and include public participation to determine the needs of communities and how their needs can be met. The Redevelopment Districts for Bradley Junction and Rolling Hills are shown in relation to the site in Exhibit 9.

Consistency with the Polk Vision:

The site has the potential to create new economic development opportunities. The challenge is to incorporate these opportunities without diminishing the quality of life for the neighboring residential communities. Improving the quality of life is one of the long-term and mid-term strategies of the Polk Vision. The various strategies concerning quality of life are described on pages 28-29 in the Quality of Life and include the ideas that, “Polk County will have a quality of life that encourages diverse backgrounds to live in harmony while developing physically, spiritually, mentally, and culturally within a healthy and safe environment.” The proposed land use change could affect the quality of life for the surrounding residential neighborhoods. The request is an extreme change from the rural character that exists near these residents today which could substantially change their sense of community and safety.

The Polk Vision describes an economic development environment that attracts quality businesses with higher paying jobs, improves productivity, and retains youth. Some of the strategies involved include the development of aggressively competitive economic development programs, an inventory of both targeted job sectors and sites deemed favorable for land use changes or expansion, competitive incentives and tax exemption programs, and the creation of partnerships that will help to produce an environment that attracts a creative young work force in the county. The proposed request is consistent with this Polk Vision because it will help to redevelop PM lands that no longer contain PM uses so that other jobs could be brought into this area. Specifically, this amendment addresses an Economic Development strategy to “create and retain commercial and industrial certified real estate inventory countywide...”

Urban Sprawl Analysis:

Urban Sprawl is usually defined as the creation of areas or urban development or uses that fail to maximize the use of existing public facilities or the use of areas within which public services are currently provided (*Source: American Planning Association’s definition of Sprawl*). The Urban Sprawl policy states that “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.” Developments that “allow 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” are inconsistent with this policy. The policy also discourages development that “promotes, allows or designates for development substantial areas of jurisdiction to develop as low-intensity, low-density, or single-use development or uses in excess of demonstrated need.”

The applicant has prepared a detailed analysis to address the issue of urban sprawl. (See applicant’s response to ORC Report.) This analysis notes the transportation geography (highway and rail), topography and distribution of developable and undevelopable lands on either side of SR 37. These factors either dictate or contribute to a development pattern that is linear in nature. The applicant’s analysis provides a credible argument that the proposed request does not constitute sprawl. Further, access to rail may serve to reduce the energy consumption associated with the future industrial uses due to the potential reduction in truck traffic.

Urban Sprawl Criteria: The following criteria are the primary indicators of urban sprawl per Rule 9J-5 of the Florida Administrative Code.	
Rule 9J-5 Urban Sprawl Criteria	Page(s) where referenced in this report
a. <i>Promotes substantial amounts of low-density, low-intensity, or single use development in excess of demonstrated need.</i>	1 – 25
b. <i>Allows a significant amount of urban development to occur in rural areas.</i>	1 – 30
c. <i>Designates an urban development in radial, strip isolated, or ribbon patterns emanating from existing urban developments.</i>	1 – 22, 27-30
d. <i>Fails to adequately protect and conserve natural resources and other significant natural systems.</i>	7, 30-33
e. <i>Fails to adequately protect adjacent agricultural areas.</i>	1 - 25
f. <i>Fails to maximize existing public facilities and services.</i>	1 - 25
g. <i>Fails to minimize the need for future facilities and services.</i>	1-30
h. <i>Allows development patterns that will disproportionately increase the cost of providing public facilities and services.</i>	1-30
i. <i>Fails to provide a clear separation between urban and rural uses.</i>	1-30
j. <i>Discourages infill development or redevelopment of existing neighborhoods.</i>	1 – 25
k. <i>Fails to encourage an attractive and functional mixture of land uses.</i>	1 – 25, 30-33
l. <i>Will result in poor accessibility among linked or related land uses.</i>	1 – 25, 30-33
m. <i>Results in the loss of a significant amount of open space.</i>	1 – 33

Future Land Use Allocation

The applicant has proposed a Future Land Use change approximately 300± acres from PM to IND. The PM district is not tracked, but assumed to transition into other uses as the mining industry moves out of the County. Polk County is currently over allocated in IND/BPC and the request will increase the over allocation. Staff is currently conducting an analysis of these land uses for the Comprehensive Plan Evaluation and Appraisal Report (EAR). The trend for IND that has surfaced is that the county has just over 7,000 acres of IND allocated. Approximately 3,000 acres of IND remain vacant or available for IND development with the possible limitations of wetlands and flood plains of approximately 1,000 acres. This leaves at least 2,000 acres of developable vacant land designated as IND. This equates to approximately half of the allocated IND being available for development today. In addition to this acreage, 43.63± acres of IND were recently approved (adopted June 17, 2009) adjacent to this site with CPA 09A-04 at the southeast corner of CR 640 and SR 37.

	FUTURE LAND USE MAP ALLOCATION		
	20 YEAR DEVELOPABLE ACREAGE NEEDS	CURRENT ALLOCATION	PROPOSED ALLOCATION
Phosphate Mining (PM)	Not tracked		
Industrial (IND)/ Business Park Center (BPC)	6,885	9,203	9,503

Comments From Other Agencies:

Florida Institute of Phosphate Research

This would seem to me to be a very good use for this land. It is in an area of somewhat mixed housing and industrial now. How do the present residents feel about having more industrial neighbors?

Florida Fresh Water Fish and Wildlife Conservation Commission

The Florida Fish and Wildlife Conservation Commission (FFWCC) reviewed the from a fish and wildlife standpoint looking for three things: 1) whether the property overlaps a portion of the Integrated Habitat Network (IHN), 2) whether the property contains a designated wildlife refuge, and/or 3) whether the property is currently being used or is likely to be used for nature-based public recreation. The application does not contain any known wildlife refuge nor does it have any apparent existing or potential recreation sites. It is, however, crossed at its northern end by a wildlife corridor identified on the FDEP’s IHN plan map. The applicant should consult with the FDEP BOMR to ascertain how the proposed change from PM to Industrial land use can best be implemented without compromising the intent of the IHN concept.

Florida Department of Environmental Protection Bureau of Mine Reclamation

There are several mandatory reclamation parcels. A large percentage of the application has reclamation obligations under Chapter 62C-16, FAC. Mosaic Fertilizer, L.L.C. is responsible for these reclamation obligations and is performing reclamation activities.

- Parcel IMC-PD-NPA(2)
 - Released
 - Covers area # 5, 8, 9, 11 of the application.
- Parcel IMC-PD-NPA(3)
 - Areas owned by applicant are Released
 - Covers areas 3 and most of 6.
- Parcel IMC-PD-NPA(4)
 - Partially released; the uplands, lakes, and herbaceous wetlands are released, and the forested wetlands are not released
 - Covers areas 1 and 2
 - Please note the eagle’s nest that has been active since the 1990s if not earlier.
- AGR-PP-G
 - nonmandatory reclamation parcel - does not have mandatory reclamation requirements
 - Covers area 4



August 5, 2009

Commissioner Sam Johnson, Chairman
Polk County Board of County Commissioners
330 West Church Street
Drawer BC01, P.O. Box 9005,
Bartow, FL 33831-9005

RE: CPA 09B-04

Dear Commissioner Johnson:

The CFRPC serves as the planners for the City of Mulberry and also participates with Polk County in a wide range of intergovernmental planning activities. Two such efforts are currently underway that include the area south of Mulberry and the area of the CPA 09B-04.

As noted in our previous comments to Ms. Ameer Bailey, of the Polk County Planning Department, We believe that approval of CPA 09B-04 may be premature. Polk County has recently initiated a Selected Area Study (SAS) of phosphate-mined areas in Southwestern Polk County to determine, with input from all stakeholders including the community, appropriate future uses for mined out lands and the commercial and industrial areas that supported the mining industries. The subject property supported phosphate mining areas in the past and it is located within the Study Area. This study is in the early stages. We believe the applicant is participating in the SAS process to assist in establishing appropriate future uses for the property and the surrounding community.

In addition, the CFRPC has just received a Brownfields Assessment Coalition Grant from the Environmental Protection Agency for a partnership with Polk County, the City of Mulberry, and the City of Fort Meade. A focus of the grant is assessment of potential contamination of previously-mined areas and planning for remediation and reuse of these lands after assessment. This grant will offer opportunities for properties located in designated Brownfields areas to become eligible for state and federal assistance and tax incentives for job creation and other benefits attractive to developers to enhance the reuse potential of these properties. This project is also just getting underway.

The confluence of both of these planning efforts focused on former phosphate mines and their supporting infrastructure suggests to us that the adoption of this land use change at this time is premature.

Sincerely Yours,

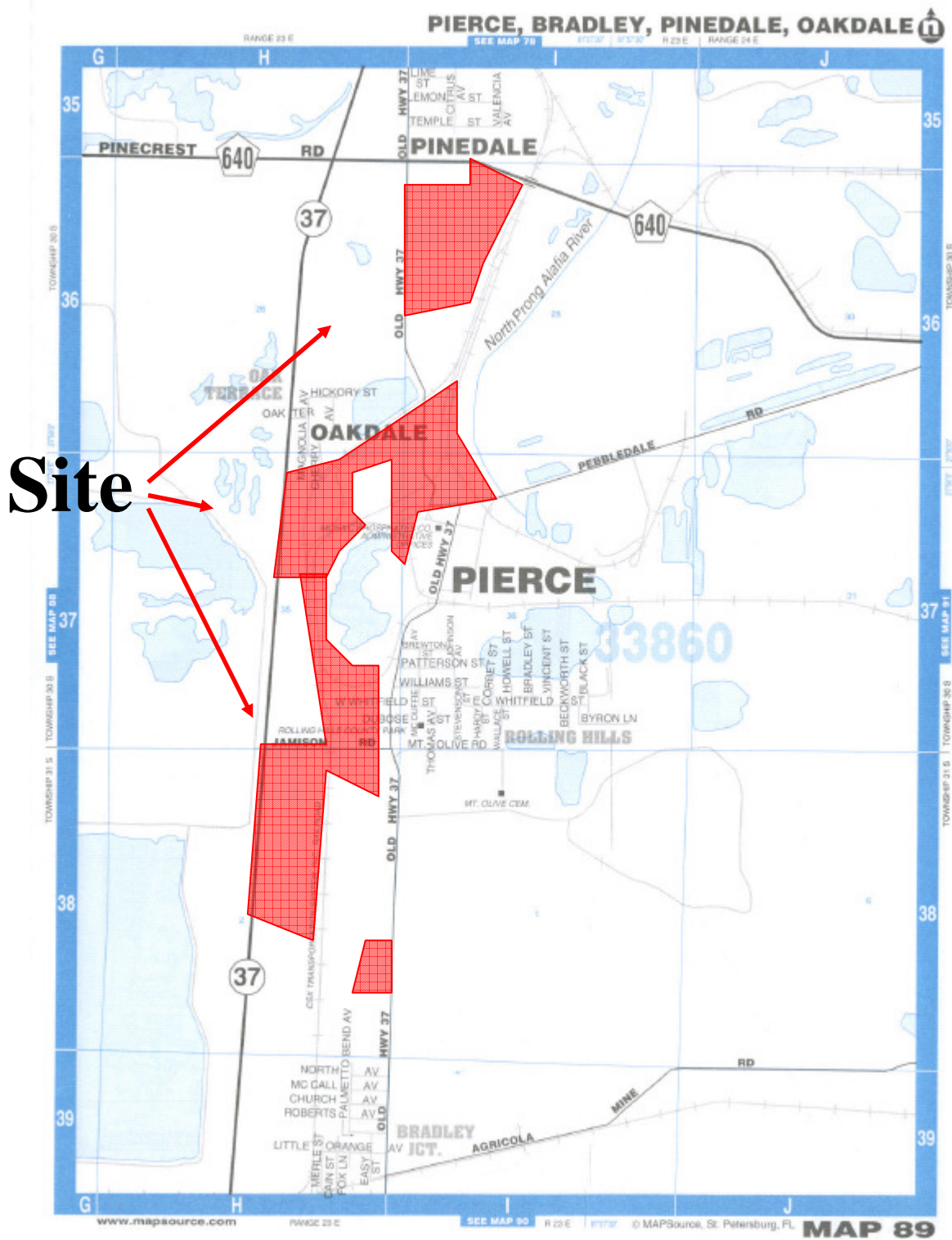
Patricia M. Steed,
Executive Director

cc: Ameer Bailey, Polk County
Frank Satchel, City of Mulberry

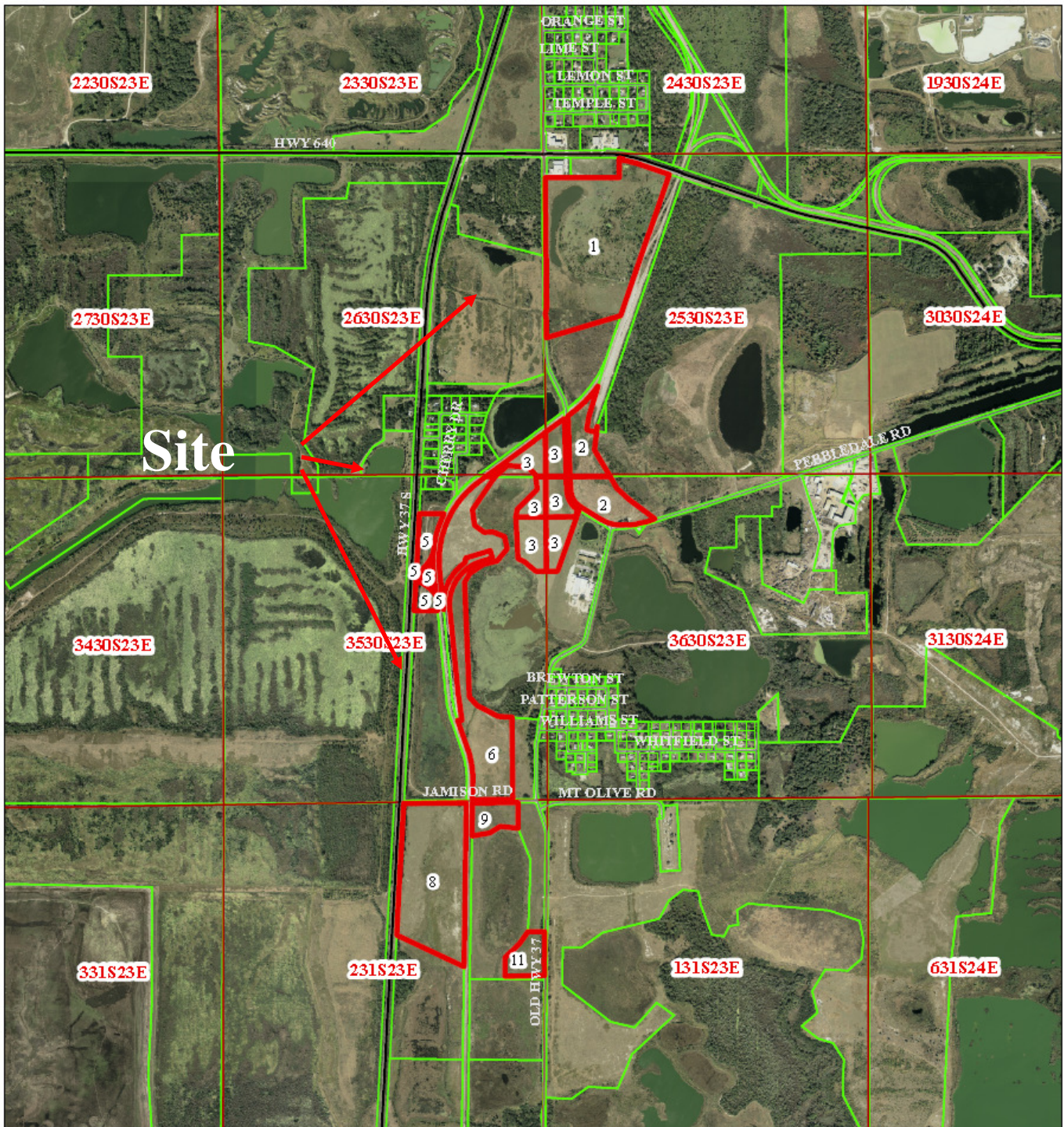


Exhibits:

- Exhibit 1 Location Map
- Exhibit 2 2008 Aerial Photograph
- Exhibit 3 Existing Future Land Use Map
- Exhibit 4 Proposed Future Land Use Map
- Exhibit 5 CPA 09A-04
- Exhibit 6 Post Mining Reclamation Design
- Exhibit 7 Wetlands and Floodplains
- Exhibit 8 Soils by Soil Id
- Exhibit 9 Redevelopment Districts

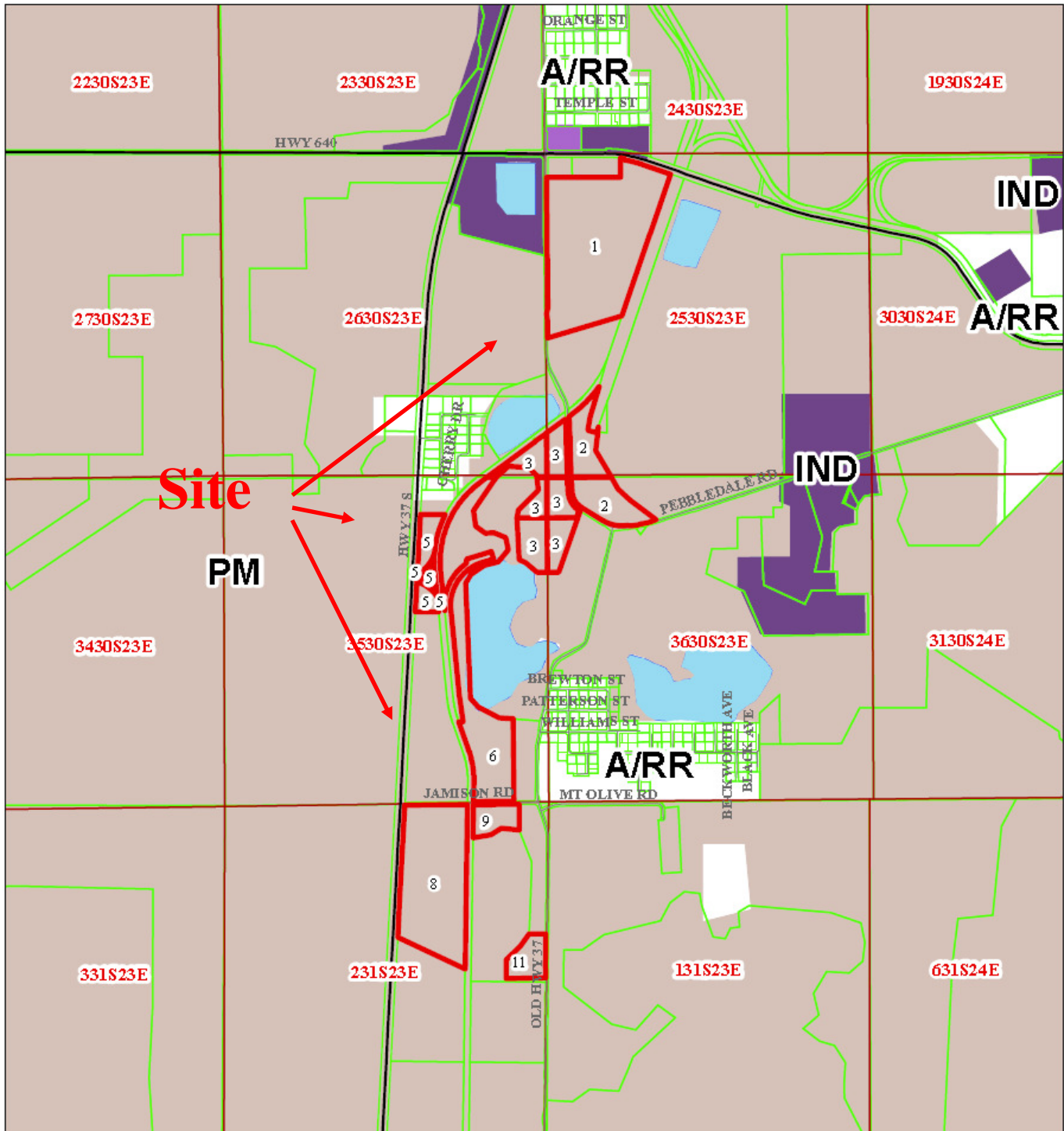


LOCATION MAP



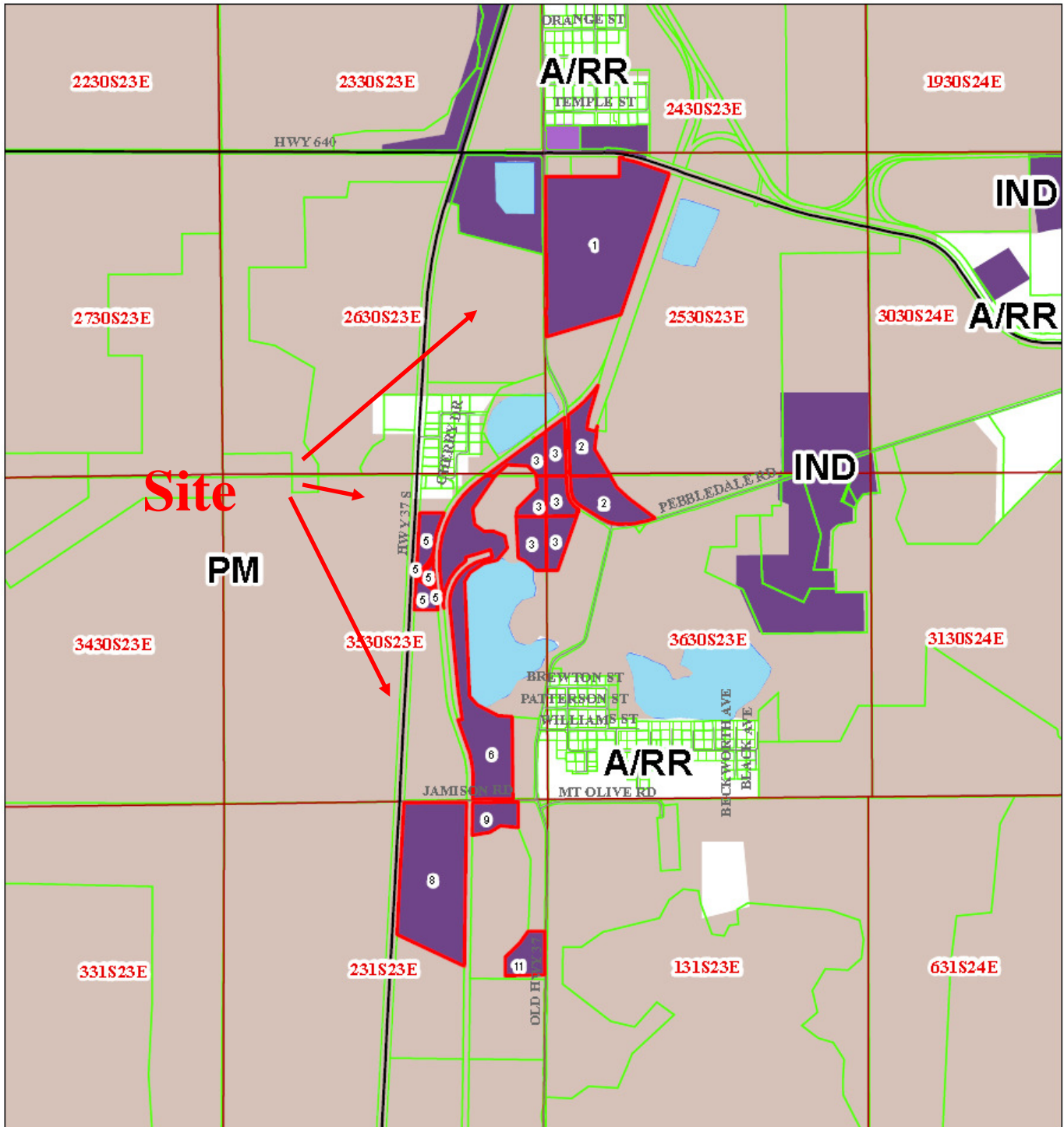
* Map ID # matches the legal description. Parcels with the same Map ID # are described in the legal with one description.

2008 AERIAL PHOTOGRAPH



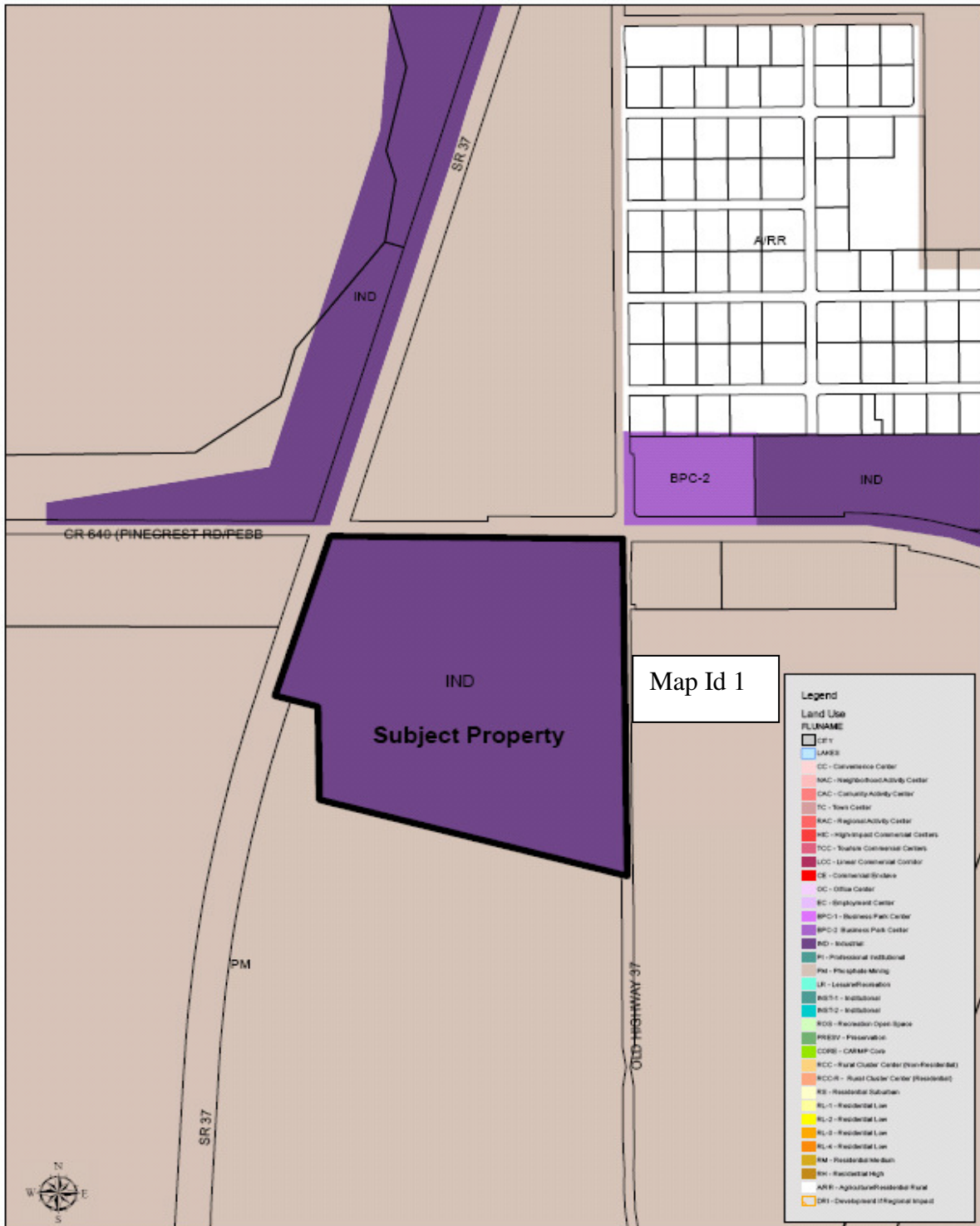
*Map ID # matches the legal description. Parcels with the same Map ID # are described in the legal with one description.

CURRENT FUTURE LAND USE MAP



*Map ID # matches the legal description. Parcels with the same Map ID # are described in the legal with one description.

PROPOSED FUTURE LAND USE MAP



CPA 09A-04



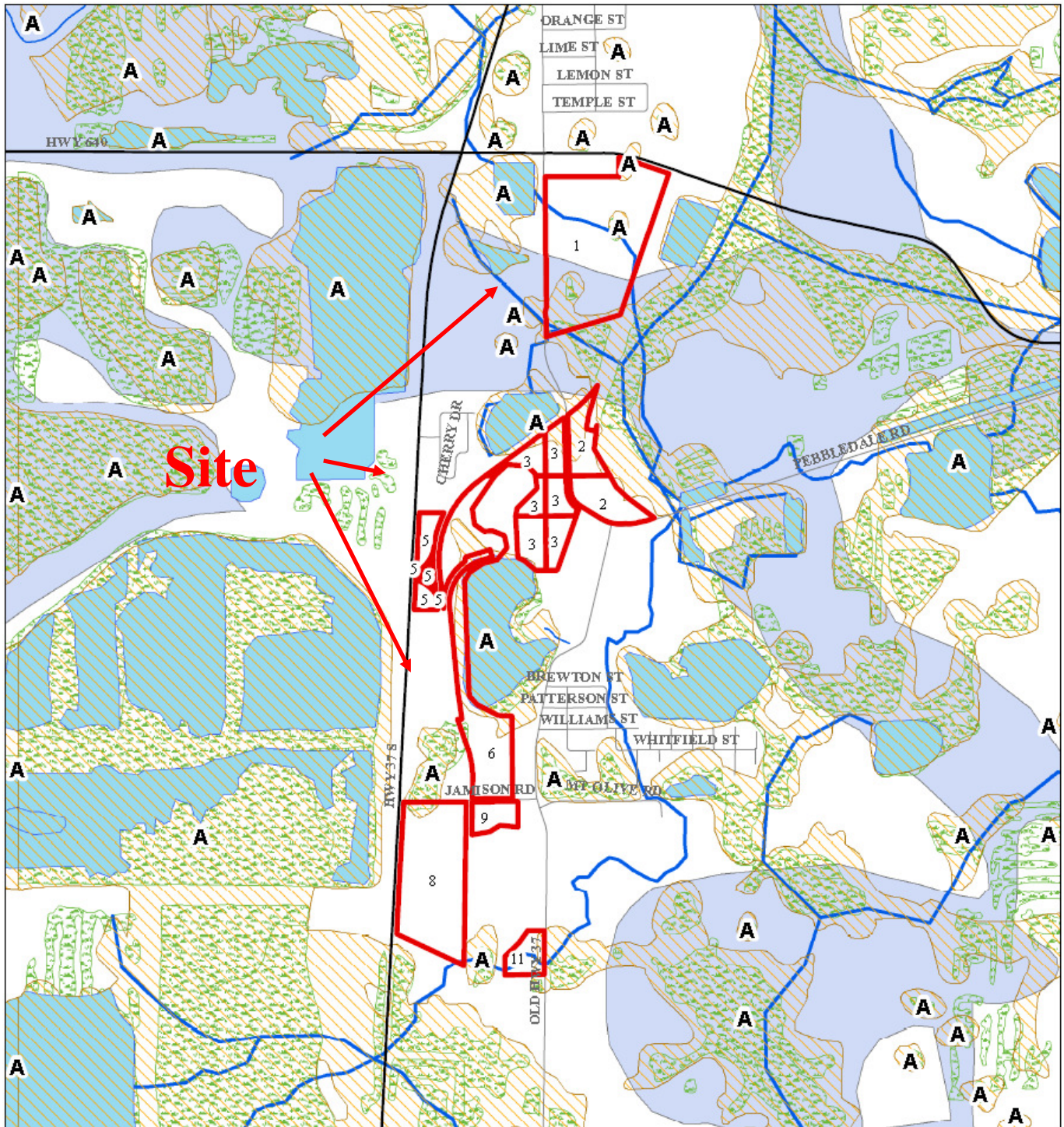
POST MINING RECLAMATION CONCEPTUAL DESIGN

Legend

	Boundary of Proposed Change		420 - Hardwood Forest
	BOMR_GYPSUMSTACKS		430 - Mixed Forest
	000 - Error		440 - Planted Forest
	007 - Unknown		460 - Succ. Woody 2nd Growth
	110 - Residential - Low Density		510 - Streams and Canals
	130 - Residential - High Density		520 - Lakes
	140 - Commercial and Services		530 - Reservoirs
	150 - Industrial		560 - Other Water Areas
	160 - Extractive		600 - Wetlands
	190 - Open Land		610 - Wetland - Hardwood Forest
	200 - Agriculture		620 - Wetland - Coniferous Forest
	210 - Cropland and Pastureland		630 - Wetland - Mixed Forest
	220 - Tree Crops		640 - Wetland - Vegetated Non-Forested
	230 - Feeding Operations		650 - Wetland - No-Vegetated
	240 - Nurseries and Vineyards		660 - Wetland Shrub
	260 - Other Agriculture		740 - Altered Lands
	310 - Herbaceous Rangeland		750 - Barren
	320 - Shrub and Brushland		810 - Transportation
	330 - Mixed Rangeland		820 - Communications
	400 - Upland Forest		830 - Utilities
	410 - Coniferous Forest		999 - Out Parcel

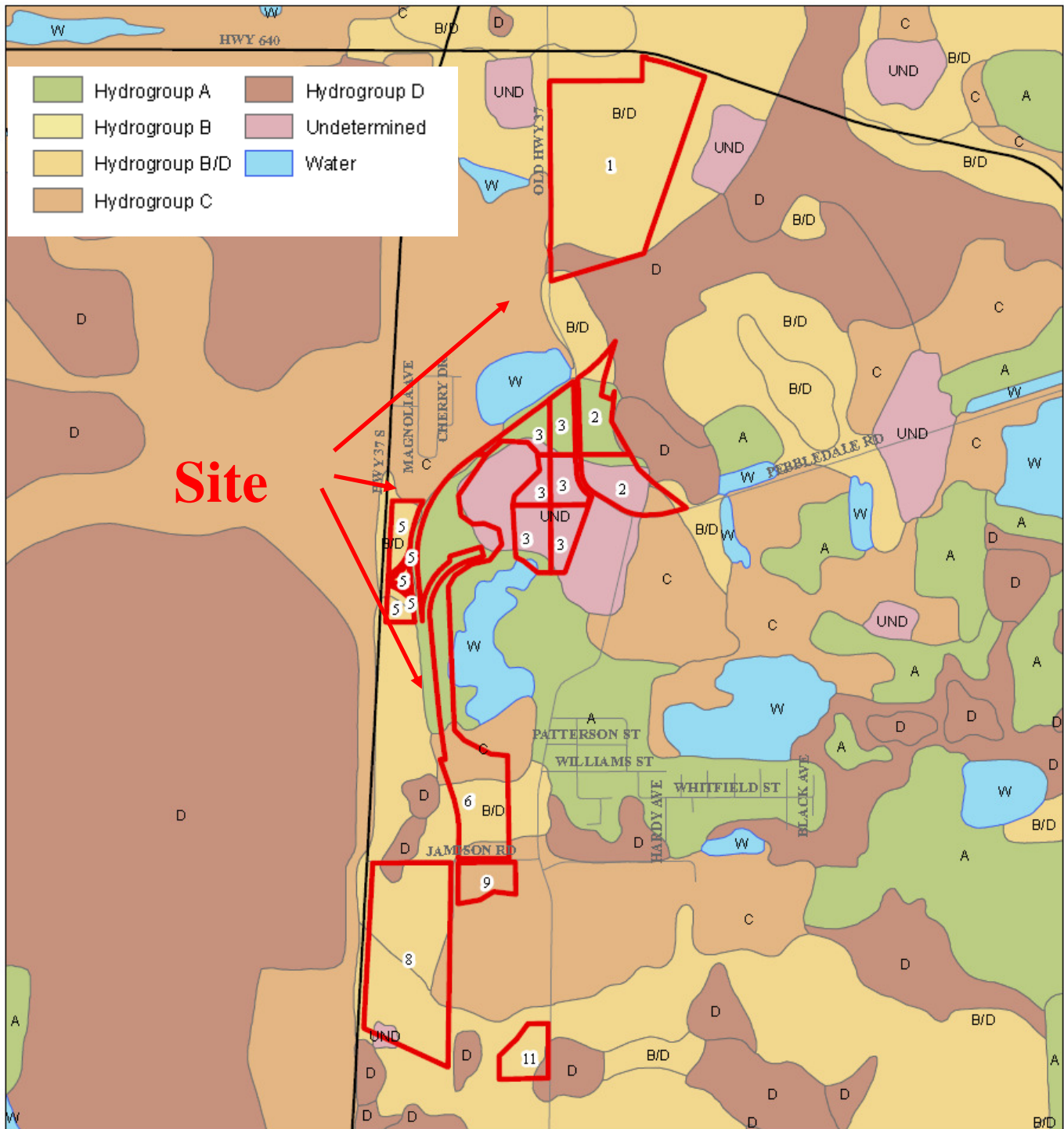
Data from:
Florida Department of Environmental Protection
Bureau of Mine Reclamation

POST MINING RECLAMATION CONCEPTUAL DESIGN



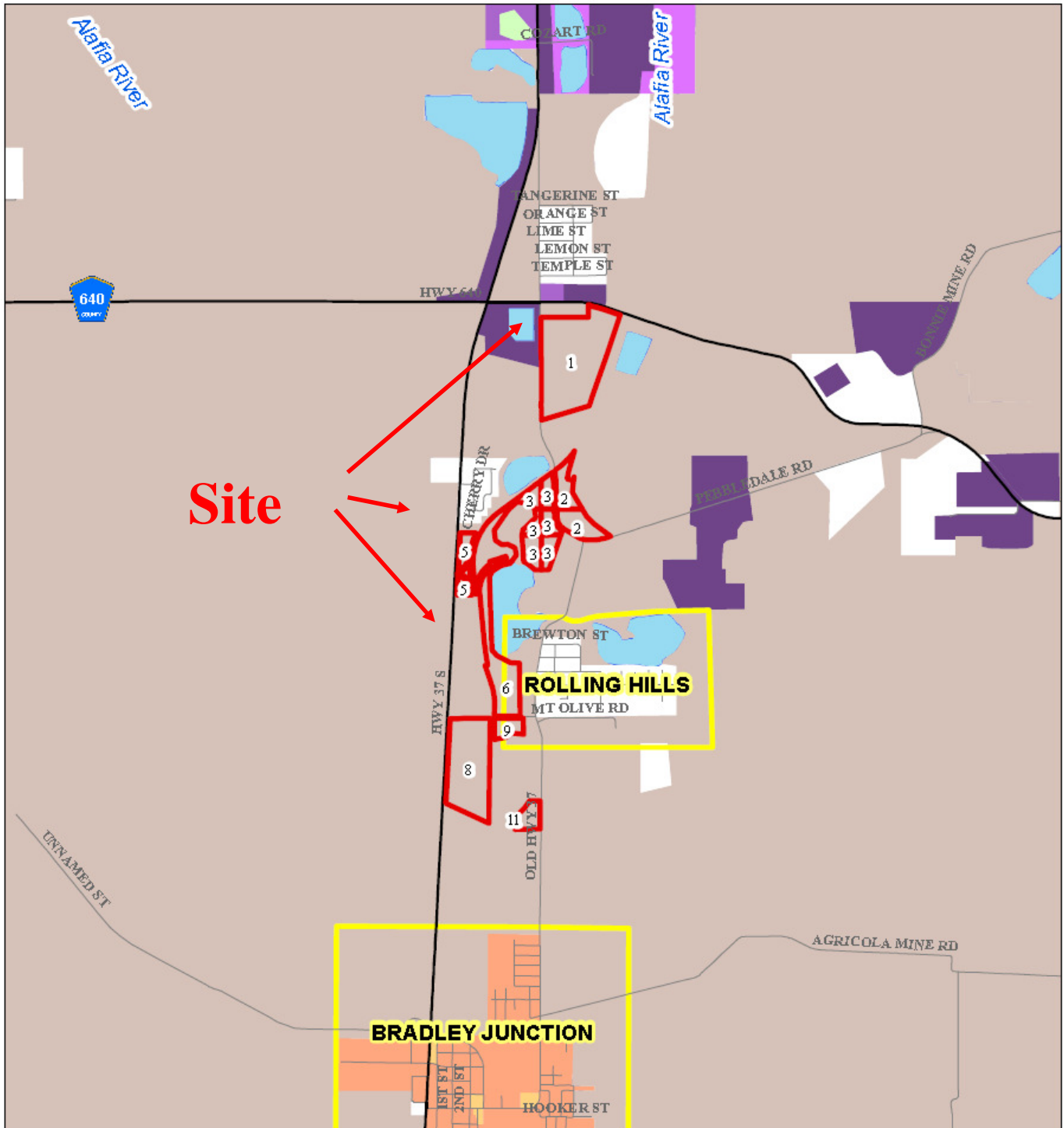
*Map ID # matches the legal description. Parcels with the same Map ID # are described in the legal with one description.

WETLANDS AND FLOODPLAINS



*Map ID # matches the legal description. Parcels with the same Map ID # are described in the legal with one description.

SOIL HYDROGROUPS



REDEVELOPMENT DISTRICTS