



STATE OF FLORIDA

DEPARTMENT OF COMMUNITY AFFAIRS

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Secretary

October 30, 2009

2009 NOV - 3 PM 10: 27

REC'D COMMUNITY AFFAIRS
ALACHUA COUNTY FL

The Honorable Rodney J. Long
Chairman, Board of County Commissioners
Alachua County
County Administration Building
12 SE 1st Street
Gainesville, Florida 32601

Dear Chairman Long:

The Department has completed its review of the proposed Comprehensive Plan Amendment for Alachua County (DCA 09-1), which was received on September 1, 2009. Based on Chapter 163, Florida Statutes, we have prepared the attached report, which outlines our findings concerning the amendment. It is particularly important that the County address the 'objections' set forth in our review report so that these issues can be successfully resolved prior to adoption. We have also included a copy of local, regional and state agency comments for your consideration. Within the next 60 days, the County should act by choosing to adopt, adopt with changes or not adopt the proposed amendment. For your assistance, our report outlines procedures for final adoption and transmittal.

The amendment package consists of three Future Land Use Map (FLUM) amendments converting land from Rural/Agriculture to Preservation; amendments to the Conservation and Open Space Elements to amend the definition of High Aquifer Recharge Areas and adopt the 'Alachua County Floridan High Aquifer Recharge Area' map and update corresponding policies to reference the map; and amendments to the Future Land Use, Transportation Mobility, Intergovernmental Coordination and Capital Improvements Elements to provide for an alternative concurrency management system within the Urban Cluster. While the Department commends the County on its continued efforts to better coordinate land use and transportation planning within the Urban Cluster by creating Transportation Mobility Districts, the Department has technical concerns related to the need to revise the area-wide level of service standards and incorporate the Strategic Intermodal System Mitigation Plan into the Comprehensive Plan.

2009 NOV 4 - 10:00 AM

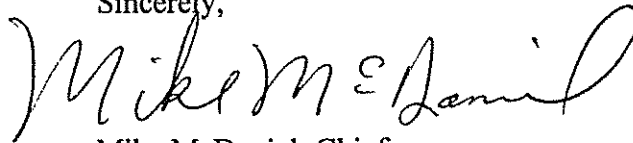
2555 SHUMARD OAK BOULEVARD, VANLUE HASSEE, FL 32399-2100
850-488-8466 (p) ♦ 850-921-0781 (f) ♦ Website: www.dca.state.fl.us

♦ COMMUNITY PLANNING 850-488-2355 (p) 850-488-3309 (f) ♦ FLORIDA COMMUNITIES TRUST 850-922-2207 (p) 850-921-1747 (f) ♦
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The Honorable Rodney J. Long
October 30, 2009
Page 2

I believe the concerns outlined in our report can be resolved with additional attention to the amendment. If you, or your staff, have any questions or if we may be of further assistance as you formulate your response to this Report, please contact Ana Richmond, Principal Planner, via email at anastasia.richmond@dca.state.fl.us or by phone at (850) 922-1794.

Sincerely,

A handwritten signature in black ink that reads "Mike McDaniel". The signature is written in a cursive style with a large, looping "M" and "D".

Mike McDaniel, Chief
Office of Comprehensive Planning

MM/ar

Enclosures: Objections, Recommendations and Comments Report
Review Agency Comments

cc: Mr. Scott Koons, AICP, North Central Florida Regional Planning Council
Mr. Steven Lachnicht, AICP, Director of Growth Management

TRANSMITTAL PROCEDURES

The process for adoption of local comprehensive plan amendments is outlined in s. 163.3184, Florida Statutes, and Rule 9J-11.011, Florida Administrative Code.

Within ten working days of the date of adoption, the County must submit the following to the Department:

- Three copies of the adopted comprehensive plan amendment;
- A copy of the adoption ordinance;
- A listing of additional changes not previously reviewed;
- A listing of findings by the local governing body, if any, which were not included in the ordinance; and
- A statement indicating the relationship of the additional changes to the Department's Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

In order to expedite the regional planning council's review of the amendment, and pursuant to Rule 9J-11.011(5), F.A.C., please provide a copy of the adopted amendment directly to Mr. Scott Koons, AICP, Executive Director of the North Central Florida Regional Planning Council.

Please be advised that the Florida legislature amended Section 163.3184(8)(b), F.S., requiring the Department to provide a courtesy information statement regarding the Department's Notice of Intent to citizens who furnish their names and addresses at the local government's plan amendment transmittal (proposed) or adoption hearings. In order to provide this courtesy information statement, local governments are required by the law to furnish to the Department the names and addresses of the citizens requesting this information. This list is to be submitted at the time of transmittal of the adopted plan amendment.

DEPARTMENT OF COMMUNITY AFFAIRS
OBJECTIONS, RECOMMENDATIONS AND COMMENTS
FOR THE ALACHUA COUNTY
COMPREHENSIVE PLAN AMENDMENT 09-1

October 30, 2009
Division of Community Planning

This report is prepared pursuant to Rule 9J-11.010, F.A.C.

INTRODUCTION

The following objections, recommendations and comments are based upon the Department's review of Alachua County's amendment to their comprehensive plan (DCA number 09-1) pursuant to Chapter 163.3184, Florida Statutes (F.S.).

The objections relate to specific requirements of relevant portions of Rule 9J-5, Florida Administrative Code (F.A.C.), and Chapter 163, Part II, F.S. Each objection includes a recommendation of one approach that might be taken to address the cited objection. Other approaches may be more suitable in specific situations. Some of these objections may have initially been raised by one of the other external review agencies. If there is a difference between the Department's objection and the external agency advisory objection or comment, the Department's objection would take precedence.

Each of these objections must be addressed by the local government and corrected when the amendment is resubmitted for our compliance review. Objections, which are not addressed, may result in a determination that the amendment is not in compliance. The Department may have raised an objection regarding missing data and analysis items, which the local government considers not applicable to its amendment. If that is the case, a statement justifying its non-applicability pursuant to Rule 9J-5.002(2), F.A.C., must be submitted. The Department will make a determination on the non-applicability of the requirement, and if the justification is sufficient, the objection will be considered addressed.

The comments, which follow the objections and recommendations section, are advisory in nature. Comments will not form bases of a determination of non-compliance. They are included to call attention to items raised by our reviewers. The comments can be substantive, concerning planning principles, methodology or logic, as well as editorial in nature dealing with grammar, organization, mapping, and reader comprehension.

Appended to the back of the Department's report are the comment letters from the other state review agencies and other agencies, organizations and individuals. These comments are advisory to the Department and may not form bases of Departmental objections unless they appear under the "Objections" heading in this report.

OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT

FOR THE ALACHUA COUNTY

PROPOSED COMPREHENSIVE PLAN AMENDMENT 09-1

I. CONSISTENCY WITH CHAPTER 163, F.S. and RULE 9J-5, F.A.C.

Amendment Overview: Amendment CPA 09-01 proposes to add policies to the Future Land Use Element authorizing Transit Oriented Development along future transit corridors in the Urban Cluster; amend policies for Traditional Neighborhood Development and Village Centers relating to locational criteria and development standards; and incorporate Urban Cluster Transportation Mobility Districts and a Future Transit Corridors map as part of the Future Land Use Map Series. The amendment also proposes to add policies to the Transportation Mobility Element to establish Transportation Mobility Districts for the Urban Cluster and related policies on transportation concurrency management; establish new and revised level of service standards for multiple modes of transportation; delete policies related to Transportation Concurrency Exception Areas, Multi-Modal Transportation Districts, and Transportation Concurrency Management Areas; limit the use of Transportation Concurrency Exceptions for Projects that Promote Public Transportation; modify level of service standards for certain County road segments outside the Urban Cluster; delete level of service standards for certain constrained roadway facilities; clarify policies on site-related access and intersection operational improvements; revise policies for construction of bicycle and pedestrian facilities; clarify policies related to use of the Future Traffic Circulation Corridors Map; revise policies related to transit; and revise and update the Transportation Mobility Element Map Series, including addition of a Transportation Mobility Districts Map, Future Rapid Transit Corridors Map, Long Term Bicycle Pedestrian Infrastructure Plan Map, and Proposed Express Transit Service Routes Map. With regards to the Intergovernmental Coordination Element the amendment proposes to modify policies related to coordination with municipalities and the Florida Department of Transportation to promote multi-modal transportation approaches and planning. Additionally, the amendment proposes to amend the Capital Improvements Element to modify policies relating to level of service standards and concurrency management for multi-modal transportation in the Urban Cluster, consistent with the Transportation Mobility Element; and update the Schedule of Capital Improvements for public facilities subject to concurrency, including a long term schedule of capital improvement projects to implement Transportation Mobility Districts in the Urban Cluster.

A. Future Land Use, Transportation Mobility, Intergovernmental Coordination and Capital Improvements Elements

1. Objection: The County has proposed to implement an area-wide level of service standard for all functionally classified County and Non SIS State Roadways within each Transportation Mobility District. However, for this approach to be meaningful the County should average the level of service on similar facilities within the designated area serving common origins and destinations.

Authority Sections 163.3177(6)(j); 163.3180(15), F.S. and Rules 9J-5.003(62), 9J-5.005 (2, 3, and 6); 9J-5.0055(2)(a and b), (3)(c); 9J-5.016(4)(a); 9J-5.019(3)(k) and 9J-5.019(4)(c), F.A.C.

Recommendation: The County should group north/south roads and east/west roads for

averaging within each district.

2. Objection: Chapter 163.3180, F.S., requires mitigation for development impacts to facilities on the Strategic Intermodal System (SIS) and coordination with the Department of Transportation on the mitigation plan. Although the County has provided a draft mitigation plan and policies requiring coordination with the Florida Department of Transportation the County has not proposed to include the mitigation plan as part of the Comprehensive Plan. Additionally, the timing of the proposed mitigation for Newberry Road (SR 26) does not ensure this facility will operate at an acceptable level of service standard.

Authority Sections 163.3177, (3)(a)5., (6)(a),(h),(j) 163.3180(3), (10), F.S. and Rule 9J-5.005(2 and 3), 9J-5.0055(2)(c), 9J-5-016(4)(b) and 9J 5.019(4)(c), F.A.C

Recommendation: The County should revise the amendment to include the SIS mitigation plan as part of the Comprehensive Plan. The County may wish to adopt the SIS Mitigation Plan by reference within the Capital Improvements Element. If adopted by reference, the County should include the appropriate title, date and author, and include the document with the adopted amendment package. The Department also recommends the County revise the SIS mitigation plan to require when Newberry Road operates at 100% or greater of its approved capacity, the County will fund within three years the construction of 8th Avenue as a parallel facility. After the construction of 8th Avenue, when Newberry reaches 100% or greater of its approved capacity the County will fully fund and commence construction of dedicated transit lane within three years.

II. CONSISTENCY WITH THE STATE COMPREHENSIVE PLAN

A. Future Land Use, Transportation Mobility, Intergovernmental Coordination and Capital Improvements Elements

1. Objection related to the use of an area-wide roadway level of service standard: The proposed plan amendment is not consistent with and does not further the following goals and policies of the State Comprehensive Plan, Section 187.201, F.S.:

- Goal (17), Public Facilities and Policies (b) 1, 5, 6, 7, and 9;
- Goal (19), Transportation and Policies (b) 2, 3, and 13; and
- Goal (25), Plan Implementation, and Policy (b)7.

Recommendation: Revise the amendments, as necessary, to be consistent with the above referenced goals and policies of the State Comprehensive Plan. Specific recommendations can be found following the objections cited previously in this report.

2. Objection related to the SIS Mitigation plan needing to be incorporated in the Comprehensive Plan: The proposed plan amendment is not consistent with and does not further the following goals and policies of the State Comprehensive Plan, Section 187.201, F.S.:

- Goal (17), Public Facilities and Policies (b) 1, 5, 6, 7, and 9;
- Goal (19), Transportation and Policies (b) 2, 3, and 13; and
- Goal (25), Plan Implementation, and Policy (b)7.

Recommendation: Revise the amendments, as necessary, to be consistent with the above

referenced goals and policies of the State Comprehensive Plan. Specific recommendations can be found following the objections cited previously in this report.



St. Johns River Water Management District

Kirby B. Green III, Executive Director • David W. Fisk, Assistant Executive Director

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
On the Internet at www.sjrwmd.com.

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9/10/09

September 10, 2009

Mr. D. Ray Eubanks
Plan Review and Processing Administrator
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

RE: Alachua County Proposed Comprehensive Plan Amendment
DCA Amendment #09-1

Dear Mr. Eubanks:

St. Johns River Water Management District (District) planning staff have reviewed the above-referenced proposed comprehensive plan amendment. The amendment consists of three changes to the future land use map (FLUM) and two text changes. District staff review focuses on water supply availability and related water resource issues in an effort to link land use planning and water supply planning. In the review of water supply availability, District staff consider infrastructure, permitted allocation under District-issued consumptive use permit (CUP), and source.

District staff have no comments because no substantial water supply availability or related water resource issues were identified.

We appreciate the opportunity to provide comments. If you have any questions or need additional information, please contact District Policy Analyst Cathleen Foerster, AICP, at (386) 329-4436 or cfoerste@sjrwmd.com.

Sincerely,

Cathleen E. Foerster, AICP, Policy Analyst
Office of Communications and Governmental Affairs

JC/LDI/cf

cc: Steve Lachnicht, Alachua County
Scott Koons, NCFRPC
Jim Quinn, FDEP
Kraig McLane, SJRWMD
Geoff Sample, SJRWMD

GOVERNING BOARD

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Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

605 Suwannee Street
Tallahassee, FL 32399-0450

STEPHANIE C. KOPELOUSOS
SECRETARY

October 15, 2009

Ray Eubanks
Division of Community Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Alachua County Proposed 09-1

Dear Mr. Eubanks:

The Florida Department of Transportation and Alachua County held discussions on Thursday, October 8, 2009 regarding FDOT's comments to Alachua County's Comprehensive Plan Amendments 09-1. The purpose of this discussion was to resolve differences between the FDOT and Alachua County as outlined in our revised response to the Department of Community Affairs dated October 8, 2009. Below is a tentative summary of our agreements:

1. The FDOT will have signatory approval of the transportation analyses and mitigation plan for developments that generate greater than 500 daily gross trips located within two miles of an SIS. All projects that generate greater than 5,000 gross daily trips, regardless of location within Alachua County, will require FDOT signatory approval of the transportation analyses and mitigation plan.
2. Areawide level of service will group north/south roads and east/west roads for averaging within each district.
3. The SIS mitigation plan must be incorporated by reference in the capital improvements element.
4. The automobile standard of measure on SIS facilities shown in the Capital Improvements Element will be FDOT Generalized Tables.
5. The County's mitigation plan for the SIS indicates that construction of SW 8th Avenue modifications will commence within three years after the point that Newberry Road operates at 100 percent of capacity. Design for dedicated transit lanes on SR 26 will begin at 110 percent of capacity with construction beginning at 120 percent of capacity. Alachua County proposes that the identified modifications to SW 8th Avenue will divert significant amounts of traffic from Newberry Road (SR 26) such that the facility will operate within acceptable level of service

parameters at the completion of construction. In support of this plan, the FDOT offers the following language for adoption within the Alachua County Comprehensive Plan: "When Newberry Road operates at 100% or greater of its approved capacity, the county will fund within three years the construction of 8th Avenue as a parallel facility. After the construction of 8th Avenue, when Newberry reaches 100% or greater of its approved capacity the County will fully fund and commence construction of dedicated transit lane within three years."

Thank you for coordinating the review of the above mentioned amendment with FDOT. If you have any questions, please do not hesitate to contact me.

Sincerely,

Austin Chapman, Engineer Trainee for:
Thomas Hill, Growth Management Administrator
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
(904)360-5653



Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

605 Suwannee Street
Tallahassee, FL 32399-0450

STEPHAN L. KOPELCOVSKY
SECRETARY

3
SP
10/6/09

October 6, 2009

Ray Eubanks
Division of Community Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Alachua County Proposed 09-1

Dear Mr. Eubanks:

FDOT has reviewed the Alachua County Proposed Future Land Use Map Amendments of the Comprehensive Plan in accordance with the requirements of Sections 163.3161 through 163.3215, Florida Statutes, and Chapter 9J-5 & Chapter 9J-11.006, F.A.C. This amendment package is part of an Evaluation and Appraisal Report and contains many text changes to the comprehensive plan. The format for FDOT comments will be in the form of showing Alachua County's subject plan or policy first, then FDOT comments.

FDOT General Comments

The County is proposing many policies to the comprehensive plan that would change transportation planning requirements within the County's designated growth boundaries. The County is proposing areawide level of service criteria and exception to transportation concurrency within designated growth boundaries. These policies are inconsistent with state statute since the County is not a statutorily designated multimodal transportation district, transportation concurrency exception area, urban service area, or a dense urban land area.

It appears that with the significant rewrite of the comprehensive plan there are references to other areas of the document that have not been updated. Please insure that all references point to the correct policy, etc.

Capital Improvements Element

Alachua County Policy 1.2.4:

Within the Urban Cluster, a level of service standard as well as a standard of measure is shown for many different modes of travel. The motor vehicle standard of measure shows "Professionally Accepted Traffic Analysis"

FDOT Comments:

The applicant has suggested the use of professionally accepted traffic analysis. Use of areawide level of service outside of an approved multimodal transportation district is not acceptable. In the determination of maximum service volume, FDOT does not accept any analysis other than generalized tables for SIS facilities. FDOT will consider the use of other professionally accepted software (LOS plan) to find the maximum service volume for non-SIS facilities given FDOT agreement with the methodology, inputs, and reasonableness of the outputs. Documentation including electronic files for any analysis must also be provided. If alternate maximum volume software is to be requested, FDOT will need to be contacted to establish a methodology meeting. The applicant must change the motor vehicle standard of measure for SIS facilities to FDOT generalized tables.

Alachua County Policy 1.3.2:

FDOT General Comments to Policy 1.3.2:

The referenced policy numbers / letters appear to be incorrect. Please check and correct the referenced policies.

Alachua County Policy 1.3.2C3:

FDOT General Comments to Policy 1.3.2C3:

The County is proposing policies that would essentially create a TCEA within the urban cluster. The County has not conducted the required analysis to show that these policies will not adversely impact the State Road System or the Strategic Intermodal System (SIS). The County must show that there are adequate safeguards to the State Road System and the SIS. Prior to adoption of the County's SIS Mitigation plan, FDOT must see evidence in the form of corridor studies and transit feasibility studies that show the identified mitigation strategies will maintain LOS standards on SIS facilities.

Alachua County Table 1: FY 2010 – 2030 Multimodal Transportation Capital Improvements Program (Page 8 – 18)

FDOT General Comments to the Capital Improvements Program:

This plan projects \$74,205,673 in FY 2010 – 2020 for mobility improvements. Funding is projected from impact fees, gas tax, future sales tax, schools, other private partnerships, state, federal, and fare collections. It is unclear what proportion of these proceeds is coming from each source. The County has not shown any documentation to support that \$74,205,673 in FY 2010 – 2020 is feasible. The County has not shown the distribution of expected transportation revenues anticipated to cover maintenance of roadways, pedestrian paths, transit ways, and transit operations. FDOT is concerned that a significant portion of the identified funding may be required to sustain operations and maintenance of existing and future mobility.

The County has shown future impact fees as an expected revenue source. The County has not quantified the transportation impacts anticipated from new developments that will pay a mobility fee as well as a presumed mode split. According to Florida Statute 163.3177, in order for developer funded projects to appear in the capital improvements element they must be guaranteed in an enforceable development agreement, interlocal agreement, or other enforceable agreement. Alachua County has identified developer funded projects in the capital improvements element without a guarantee. FDOT is concerned that the County may be expecting revenues from sources, such as developer contributions, that may serve to degrade the transportation system more than they help improve the system. Florida Statute 163.3177 requires the County to identify other existing revenue sources that will be used to fund the capital projects in case the future sales tax is not approved.

This plan should not be adopted without proper supporting documentation. It is imperative that Alachua County quantify transportation impacts to other jurisdictions and mitigate accordingly. Corridor studies as well as transit feasibility studies must be conducted to show that the proposed mitigation plans will work to maintain acceptable Levels of Service on State Roads and SIS facilities throughout the timeframe of the comprehensive plan. Revenue estimates by source along with contingency plans must be identified along with maintenance and operation costs to show that there are adequate revenues for the capital projects envisioned.

Transportation Mobility Element

Alachua County Policy 1.1.4:

Within the Urban Cluster, a level of service standard as well as a standard of measure is shown for many different modes of travel. The motor vehicle standard of measure shows "Professionally Accepted Traffic Analysis".

FDOT Comments:

The applicant has suggested the use of professionally accepted traffic analysis. Use of areawide level of service outside of an approved multimodal transportation district is not acceptable. In the determination of maximum service volume of a road, FDOT does not accept any analysis other than generalized tables for SIS facilities. FDOT will consider the use of other professionally accepted software (LOS plan) to find the maximum service volume for non-SIS facilities given FDOT agreement with the methodology, inputs, and reasonableness of the outputs. Documentation including electronic files for any analysis must also be provided. If alternate maximum volume software is to be requested, FDOT will need to be contacted to establish a methodology meeting. The applicant must change the motor vehicle standard of measures for SIS facilities to FDOT generalized tables.

Alachua County Policy 1.1.4 - 3:

Within each Transportation Mobility District, achievement of the LOS for a functionally classified County and Non-SIS State Roadways shall be based on an Areawide LOS. The Areawide LOS shall be determined by dividing the sum (Σ) of the total traffic by the sum (Σ) of the maximum service volume at the adopted LOS standard for all functionally classified County and Non SIS State Roadways.

FDOT Comments:

This approach is only appropriate within approved multimodal transportation districts (MMTD). Alachua County is not applying for an MMTD nor has Alachua County conducted appropriate analysis for an MMTD. This system assumes that adding capacity on any road will reduce demand on other roads. There has been no corridor analysis to show that this is a valid assumption in Alachua County. Level of Service is specific to the segment of road with particular attributes; it should not be averaged between segments of the same road or other roads. This approach will average an over capacity road that tends to be an arterial with smaller roads that tend to have available capacity; thereby, showing an acceptable areawide level of service even though the arterial is over capacity. FDOT does not believe this areawide approach offers protection to the State Road System. The existing segment by segment approach is the best approach to determine if State Roads are maintaining an acceptable level of service. Using the current segment by segment approach, the County may upgrade parallel corridors as mitigation if a proper corridor analysis is provided to show that this improvement mitigates impacts to the road being studied. Areawide Level of Service is not needed to support Alachua County's other contemplated provisions of the comprehensive plan. FDOT suggests that this policy not be adopted.

Alachua County Policy 1.1.4 - 4:

The LOS for SIS facilities within the Urban Cluster shall be addressed through various means such as the construction of parallel roadways serving similar travel demand patterns, dedicated transit lane(s), access management and transit service as provided for in the Multi-Modal Transportation Capital Improvements Program.

FDOT Comments:

According Florida Statute 163.3180, "Mitigation for development impacts to facilities on the Strategic Intermodal System...requires the concurrence of the Department of Transportation." There must be a corridor study and transit feasibility study to show that these alternatives will work to protect the LOS in SIS facilities.

Alachua County Policy 1.1.6.6

Should the Areawide LOS for motor vehicles within a Transportation Mobility District fall below adopted LOS standards, then the County shall as a part of its annual update to the Capital Improvements Element either identify additional motor vehicle capacity projects or increase peak-hour transit frequencies and provide off-peak transit service with at least 30 minute headways along Express Transit Corridors.

FDOT Comments:

FDOT does not agree with the areawide LOS approach. There must be a corridor study and transit feasibility study to show that these alternatives will work to protect the LOS on State Roads.

Alachua County Policy 1.1.6.8:

The County may elect, but shall not be required, to construct dedicated transit lanes on existing roadways identified on the Rapid Transit Corridors map until such time as the roadway is operating at or below the adopted LOS standard. Any changes to time frames shall require an amendment to the Capital Improvements Element.

FDOT Comments:

This amendment contradicts the financial feasibility requirement of Florida Statute 163.3177. This proposed policy is not clear regarding if this applies to the areawide LOS as defined in Alachua County Policy 1.1.4 or if this applies to traditional segment by segment LOS. FDOT believes that if Alachua County would like to fund dedicated transit lanes, the current proportionate fair share approach mitigation can be used so long as a transit feasibility study shows enough decreased vehicular travel demand for the roadway due to increased transit investment. The County must commit to an adequate and feasible mitigation strategy at the time any segment of roadway falls below the adopted level of service standard.

Alachua County Policy 1.1.7 - 2:

No development shall receive a final development plan approval where the development impacts a roadway operating below the adopted LOS, except through the proportionate share ordinance or until such time as a multi-modal transportation fee is adopted that addresses the traffic impact of the development.

FDOT Comments:

FDOT does not believe the multi-modal transportation fee gives any assurances that State Roads will operate at an acceptable Level of Service. Prior to implementation of a multi-modal transportation fee, studies must be performed to determine the cost and effectiveness of the proposed mitigation strategies

Alachua County Policy 1.1.9:

This policy allows for Transportation Concurrency Exceptions for Projects that Promote Public Transportation (TCEPPT). This policy also limits the applicability of this provision to proposed developments that applied prior to April 2nd 2009. Policies 1.1.9.1 – 1.1.9.5 clarify applicable locations, regulations, eligibility requirements, and zoning requirements. It is also stated that the TCEPPT projects must meet the standards of Florida Statutes 163.3164 and 163.3180.

FDOT Comments:

FDOT does not concur with the assessments that the statutory provision providing for TCEPPT applies to the magnitude of the developments now envisioned at these locations. There are currently two DRI developments proposing to go forward as TCEPPT's. All proposed DRI's must meet Rule 9J-2 of the Florida Administrative Code which requires analysis to determine all significant and adverse impacts to roadway segments as well as mitigation of those impacts. Please remove all reference to TCEPPT's from the Alachua County Comprehensive Plan as they are unnecessary and add confusion to the role of Florida Statutes and Florida Administrative Code.

Alachua County Mobility – Strategic Intermodal System (SIS) Mitigation Plan

General FDOT Comments:

The County is proposing policies that would essentially create a TCEA within the urban cluster. The County has not provided the required analysis to show that these policies will not adversely impact the State Road System or the Strategic Intermodal System (SIS). The County must show that there are adequate safeguards to the State Road System and the SIS. Prior to adoption of the County's SIS Mitigation plan, FDOT must see evidence in the form of corridor studies and transit feasibility studies that show the identified mitigation strategies will maintain LOS standards on SIS facilities.

The County is proposing areawide level of service standards. FDOT does not agree with areawide level of service because it does not offer protection to the State Road System. Without proper analysis, it is unclear what off site improvements will mitigate impacts to a corridor. Florida Statutes clearly indicate each local government must use concurrency as a tool to ensure an adequate level of service is maintained. FDOT recognizes the intent of Alachua County's mobility fee proposal. However, the areawide level of service provision is not a necessary component to achieve the overall goals. Areawide level of service is only appropriate in multimodal districts and do not make sense in areas that are not contiguous (such as the East District) and do not accurately reflect transportation demands on the primary roadway system.

The County's SIS Mitigation Plan references roadways that are over capacity based on approved development (reserved) trips that would cause LOS failure on SIS facilities. Development rights have been granted by the County and these potential transportation impacts must be accurately accounted in the concurrency process. FDOT believes that a more proactive approach is necessary to safeguard the State Road System and SIS.

Newberry Road (SR 26)

Alachua County Statement

"Currently this roadway operates at an acceptable LOS. With the addition of reserved trips over the next 10 years, portions of this roadway are projected to be over capacity by 2018. With the current slowdown in residential development, some of the reserved trips may be removed pushing the time frame to 2020 or later."

FDOT Comments:

Newberry Road (SR 26) is projected to fail by 2017 given historical background growth only. The proposed mobility fee does not address the development that is currently approved: the County's plan must realistically account for approved transportation impacts. Further, this plan does not demonstrate that the adopted level of service standards will be achieved and maintained as required by Rule 9J5.0055 Florida Administrative Code. Prior to adopting this mitigation plan, the County must conduct a corridor and transit feasibility study with all approved development trips as a baseline.

Alachua County Statement

"The County proposes to construct and upgrade SW 8th Avenue from I-75 to CR 241 to provide a parallel roadway to Newberry Road."

FDOT Comments:

SW 8th Avenue is parallel to SR 26; however, the County has not shown any evidence that this roadway will relieve traffic from SR 26. The County must conduct a corridor analysis of SR 26 to determine if the improvement this parallel corridor will cause enough traffic reduction on SR 26 to maintain an acceptable level of service with the inclusion of approved development trips and any development that will pay impact fees to fund this parallel roadway improvement.

Alachua County Statement

"Upon Newberry Road operating at 110% of its capacity, the County will commence design of a dedicated transit lane within the median of Newberry Road. Upon Newberry Road operating at 120% of its capacity, the County shall fully fund and commence construction within three (3) years of a dedicated transit lane within the median. Starting in 2015, express transit service shall be provided along Newberry Road from CR 241 (NW 143rd) to the University of Florida consistent with the headways adopted in the Comprehensive Plan Amendment Transit LOS Standards."

FDOT Comments:

The County has not shown that this dedicated transit line will relieve any traffic from SR 26. In addition, this transit line may be harmful to the operations of this roadway if signal timing is affected. It is also unclear if this transit line can be run in the median for all areas particularly from I-75 to the University. Consistent with Florida Statute 163.3180, mitigation shall be in place or under actual construction within 3 years of the failure caused by approved development. The applicant must change the language to show that within three (3) years of Newberry Road operating at 100% of its capacity, the County shall fully fund and commence construction of dedicated transit lane within the median and operate transit to the extent that shall be sufficient to bring Newberry Road back to an acceptable level of service, consistent with the transit feasibility study.

I-75

Alachua County Statement

"The primary travel demand within the Urban Cluster of Alachua County is east-west over Interstate 75. The interchanges along I-75 could be impacted due to increased traffic volumes on intersecting arterial roadways." Mitigation is in the form of overpasses over I-75.

FDOT Comments:

While FDOT does agree that most of the travel demand within the Urban Cluster of Alachua would demand generally an east-west route, FDOT believes there is a strong desire to use I-75 for any traveler to commute from CR 222 / SR 222 to Downtown Gainesville. I-75 will also be used for other trips created by approved development within the urban cluster such as Santa Fe DRI and Spring Hills DRI as well as future developments. It is imperative that mainline I-75 as well as the interchanges to I-75 be mitigated for any adverse impacts.

Hawthorne Road (SR 20)

FDOT Comments:

There is no mitigation plan for SR 20 from Hawthorne to the Putnam County line. This section of roadway currently has a v/c of 1.08 based on 2008 counts.

NW 39th Avenue (SR 222)

Alachua County Statement

"NW 39th Avenue (SR 222) has adequate capacity today and into the future. NW 39th Avenue is currently an Emerging SIS facility, thus its mitigation requirements differ somewhat from SIS facilities. The Mobility Plan recognizes that both Santa Fe DRI and Springhills DRI will have a significant impact to NW 39th Avenue. The County is taking the proactive approach to address the future impact from these projects as well as future expansion plans for Santa Fe College."

FDOT Comments:

For the purposes of growth management, Emerging SIS facilities have the same mitigation requirements as SIS facilities. Given historical background growth only, SR 222 from NW 83rd to NW 43rd is projected to fail in 2016. When Santa Fe DRI, Springhills DRI, and other approved developments are factored in, SR 222 will be over capacity much sooner. The applicant must show a feasible plan for mitigation including a corridor study and transit feasibility study.

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"Approximately one (1) mile to the south, the Mobility Plan includes a proposal to four (4) lane NW 23rd Avenue from NW 98th to NW 55th... In addition to parallel roadways, a system of dedicated transit lanes is also proposed along NW 83rd and Ft. Clark Blvd to connect to planned transit corridors within the City of Gainesville."

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NW 23rd Avenue is parallel to SR 222; however, the County has not shown any evidence that this roadway will relieve traffic from SR 222, an SIS facility. The County also has not shown evidence that the envisioned transit plan will reduce vehicular travel demand on SR 222. A corridor analysis and transit feasibility study for SR 222 must be conducted to determine if the improvement this parallel corridor and transit will cause enough traffic reduction on SR 222 to maintain an acceptable level of service with the inclusion of approved development trips and any development that will pay impact fees to fund these improvements.

Ordinance 07-23 (Transportation Impact Fee Amendment)

Page 14 – Formula

FDOT Comments:

1. Trip Rate should be defined as a Daily rate
2. Construction, Right of Way, and Engineering costs are defined as variables in the formula and as constants below the formula. FDOT understands the intent but suggests clarification.
3. The constant of Lane Capacity should have applicable units (passenger cars / day?)
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“No funds shall be spent for the expansion of through lanes on the Interstate Highway System”

FDOT Comments:

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Alachua County’s Table

| Roadway | From | To | Existing AADT | 2% Annual Growth Rate | | |
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| Archer Road (SR 24) | I-75 | Tower Road (SW 75 th) | 25,500 | 25,756 | 26,015 | 34,320 |

FDOT’s Correction

| Roadway | From | To | Existing AADT | 2% Annual Growth Rate | | |
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Bold indicates differences between tables

There was also an error in the existing AADT shown for NW 39th Ave (SR 222) from NW 43rd St to NW 83rd St. The existing traffic was shown as 31,000 when this total should reflect 33,500.

Given this methodology and correcting the two errors, SIS facilities which are also State Roads within Alachua County fail by 2011.

FDOT General Closing Comments

The County is proposing many policies to the comprehensive plan that would change transportation planning requirements within the County's designated growth boundaries. The County is proposing areawide level of service criteria and exception to transportation concurrency within designated growth boundaries. These policies are inconsistent with state statute since the County is not a statutorily designated multimodal transportation district, transportation concurrency exception area, urban service area, or a dense urban land area. FDOT objects to the areawide level of service proposal. The policy revisions to the Alachua County comprehensive plan also are not supported by technical documentation. FDOT does not object to a mobility fee concept provided sufficient analysis is provided by Alachua County that demonstrates the LOS standards for State Roads and SIS facilities are maintained.

Thank you for coordinating the review of the above mentioned amendment with FDOT. If you have any questions, please do not hesitate to contact me.

Sincerely,

Austin Chapman, Engineer Trainee for:
Thomas Hill, Growth Management Administrator
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
(904)360-5653



3 SP
9/30/09

Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

405 Suwannee Street
Tallahassee, FL 32399-4450

STEPHANIE C. KOPELSON
SECRETARY

September 29, 2009

Ray Eubanks
Division of Community Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Alachua County Proposed 09-1

Dear Mr. Eubanks:

FDOT has reviewed the Alachua County Proposed Future Land Use Map Amendments of the Comprehensive Plan in accordance with the requirements of Sections 163.3161 through 163.3215, Florida Statutes, and Chapter 9J-5 & Chapter 9J-11.006, F.A.C. This amendment package is part of an Evaluation and Appraisal Report and contains many text changes to the comprehensive plan. The format for FDOT comments will be in the form of showing Alachua County's subject plan or policy first, then FDOT comments.

FDOT General Comments

The County is proposing many policies to the comprehensive plan that would change transportation planning requirements within the County's designated growth boundaries. The County is proposing areawide level of service criteria and exception to transportation concurrency within designated growth boundaries. These policies are inconsistent with state statute since the County is not a statutorily designated multimodal transportation district, transportation concurrency exception area, urban service area, or a dense urban land area.

It appears that with the significant rewrite of the comprehensive plan there are references to other areas of the document that have not been updated. Please insure that all references point to the correct policy, etc.

Capital Improvements Element

Alachua County Policy 1.2.4:

Within the Urban Cluster, a level of service standard as well as a standard of measure is shown for many different modes of travel. The motor vehicle standard of measure shows "Professionally Accepted Traffic Analysis"

FDOT Comments:

The applicant has suggested the use of professionally accepted traffic analysis. Use of areawide level of service outside of an approved multimodal transportation district is not acceptable. In the determination of maximum service volume, FDOT does not accept any analysis other than generalized tables for SIS facilities. FDOT will consider the use of other professionally accepted software (LOS plan) to find the maximum service volume for non-SIS facilities given FDOT agreement with the methodology, inputs, and reasonableness of the outputs. Documentation including electronic files for any analysis must also be provided. If alternate maximum volume software is to be requested, FDOT will need to be contacted to establish a methodology meeting. The applicant must change the motor vehicle standard of measure for SIS facilities to FDOT generalized tables.

Alachua County Policy 1.3.2:

FDOT General Comments to Policy 1.3.2:

The referenced policy numbers / letters appear to be incorrect. Please check and correct the referenced policies.

Alachua County Policy 1.3.2C3:

FDOT General Comments to Policy 1.3.2C3:

The County is proposing policies that would essentially create a TCEA within the urban cluster. The County has not conducted the required analysis to show that these policies will not adversely impact the State Road System or the Strategic Intermodal System (SIS). The County must show that there are adequate safeguards to the State Road System and the SIS. Prior to adoption of the County's SIS Mitigation plan, FDOT must see evidence in the form of corridor studies and transit feasibility studies that show the identified mitigation strategies will maintain LOS standards on SIS facilities.

Alachua County Table 1: FY 2010 - 2030 Multimodal Transportation Capital Improvements Program (Page 8 - 18)

FDOT General Comments to the Capital Improvements Program:

This plan projects \$74,205,673 in FY 2010 - 2020 for mobility improvements. Funding is projected from impact fees, gas tax, future sales tax, schools, other private partnerships, state, federal, and fare collections. It is unclear what proportion of these proceeds is coming from each source. The County has not shown any documentation to support that \$74,205,673 in FY 2010 - 2020 is feasible. The County has not shown the distribution of expected transportation revenues anticipated to cover maintenance of roadways, pedestrian paths, transit ways, and transit operations. FDOT is concerned that a significant portion of the identified funding may be required to sustain operations and maintenance of existing and future mobility.

The County has shown future impact fees as an expected revenue source. The County has not quantified the transportation impacts anticipated from new developments that will pay a mobility fee as well as a presumed mode split. According to Florida Statute 163.3177, in order for developer funded projects to appear in the capital improvements element they must be guaranteed in an enforceable development agreement, interlocal agreement, or other enforceable agreement. Alachua County has identified developer funded projects in the capital improvements element without a guarantee. FDOT is concerned that the County may be expecting revenues from sources, such as developer contributions, that may serve to degrade the transportation system more than they help improve the system. Florida Statute 163.3177 requires the County to identify other existing revenue sources that will be used to fund the capital projects in case the future sales tax is not approved.

This plan should not be adopted without proper supporting documentation. It is imperative that Alachua County quantify transportation impacts to other jurisdictions and mitigate accordingly. Corridor studies as well as transit feasibility studies must be conducted to show that the proposed mitigation plans will work to maintain acceptable Levels of Service on State Roads and SIS facilities throughout the timeframe of the comprehensive plan. Revenue estimates by source along with contingency plans must be identified along with maintenance and operation costs to show that there are adequate revenues for the capital projects envisioned.

Transportation Mobility Element

Alachua County Policy 1.1.4:

Within the Urban Cluster, a level of service standard as well as a standard of measure is shown for many different modes of travel. The motor vehicle standard of measure shows "Professionally Accepted Traffic Analysis".

FDOT Comments:

The applicant has suggested the use of professionally accepted traffic analysis. Use of areawide level of service outside of an approved multimodal transportation district is not acceptable. In the determination of maximum service volume of a road, FDOT does not accept any analysis other than generalized tables for SIS facilities. FDOT will consider the use of other professionally accepted software (LOS plan) to find the maximum service volume for non-SIS facilities given FDOT agreement with the methodology, inputs, and reasonableness of the outputs. Documentation including electronic files for any analysis must also be provided. If alternate maximum volume software is to be requested, FDOT will need to be contacted to establish a methodology meeting. The applicant must change the motor vehicle standard of measures for SIS facilities to FDOT generalized tables.

Alachua County Policy 1.1.4 - 3:

Within each Transportation Mobility District, achievement of the LOS for a functionally classified County and Non-SIS State Roadways shall be based on an Areawide LOS. The Areawide LOS shall be determined by dividing the sum (Σ) of the total traffic by the sum (Σ) of the maximum service volume at the adopted LOS standard for all functionally classified County and Non SIS State Roadways.

FDOT Comments:

This approach is only appropriate within approved multimodal transportation districts (MMTD). Alachua County is not applying for an MMTD nor has Alachua County conducted appropriate analysis for an MMTD. This system assumes that adding capacity on any road will reduce demand on other roads. There has been no corridor analysis to show that this is a valid assumption in Alachua County. Level of Service is specific to the segment of road with particular attributes; it should not be averaged between segments of the same road or other roads. This approach will average an over capacity road that tends to be an arterial with smaller roads that tend to have available capacity; thereby, showing an acceptable areawide level of service even though the arterial is over capacity. FDOT does not believe this areawide approach offers protection to the State Road System. The existing segment by segment approach is the best approach to determine if State Roads are maintaining an acceptable level of service. Using the current segment by segment approach, the County may upgrade parallel corridors as mitigation if a proper corridor analysis is provided to show that this improvement mitigates impacts to the road being studied. Areawide Level of Service is not needed to support Alachua County's other contemplated provisions of the comprehensive plan. FDOT suggests that this policy not be adopted.

Alachua County Policy 1.1.4 - 4:

The LOS for SIS facilities within the Urban Cluster shall be addressed through various means such as the construction of parallel roadways serving similar travel demand patterns, dedicated transit lane(s), access management and transit service as provided for in the Multi-Modal Transportation Capital Improvements Program.

FDOT Comments:

According Florida Statute 163.3180, "Mitigation for development impacts to facilities on the Strategic Intermodal System... requires the concurrence of the Department of Transportation." There must be a corridor study and transit feasibility study to show that these alternatives will work to protect the LOS in SIS facilities.

Alachua County Policy 1.1.6.6

Should the Areawide LOS for motor vehicles within a Transportation Mobility District fall below adopted LOS standards, then the County shall as a part of its annual update to the Capital Improvements Element either identify additional motor vehicle capacity projects or increase peak-hour transit frequencies and provide off-peak transit service with at least 30 minute headways along Express Transit Corridors.

FDOT Comments:

FDOT does not agree with the areawide LOS approach. There must be a corridor study and transit feasibility study to show that these alternatives will work to protect the LOS on State Roads.

Alachua County Policy 1.1.6.8:

The County may elect, but shall not be required, to construct dedicated transit lanes on existing roadways identified on the Rapid Transit Corridors map until such time as the roadway is operating at or below the adopted LOS standard. Any changes to time frames shall require an amendment to the Capital Improvements Element.

FDOT Comments:

This amendment contradicts the financial feasibility requirement of Florida Statute 163.3177. This proposed policy is not clear regarding if this applies to the areawide LOS as defined in Alachua County Policy 1.1.4 or if this applies to traditional segment by segment LOS. FDOT believes that if Alachua County would like to fund dedicated transit lanes, the current proportionate fair share approach mitigation can be used so long as a transit feasibility study shows enough decreased vehicular travel demand for the roadway due to increased transit investment. The County must commit to an adequate and feasible mitigation strategy at the time any segment of roadway falls below the adopted level of service standard.

Alachua County Policy 1.1.7 - 2:

No development shall receive a final development plan approval where the development impacts a roadway operating below the adopted LOS, except thorough the proportionate share ordinance or until such time as a multi-modal transportation fee is adopted that addresses the traffic impact of the development.

FDOT Comments:

FDOT does not believe the multi-modal transportation fee gives any assurances that State Roads will operate at an acceptable Level of Service. Prior to implementation of a multi-modal transportation fee, studies must be performed to determine the cost and effectiveness of the proposed mitigation strategies.

Alachua County Mobility – Strategic Intermodal System (SIS) Mitigation Plan

General FDOT Comments:

The County is proposing policies that would essentially create a TCEA within the urban cluster. The County has not provided the required analysis to show that these policies will not adversely impact the State Road System or the Strategic Intermodal System (SIS). The County must show that there are adequate safeguards to the State Road System and the SIS. Prior to adoption of the County's SIS Mitigation plan, FDOT must see evidence in the form of corridor studies and transit feasibility studies that show the identified mitigation strategies will maintain LOS standards on SIS facilities.

The County is proposing areawide level of service standards. FDOT does not agree with areawide level of service because it does not offer protection to the State Road System. Without proper analysis, it is unclear what off site improvements will mitigate impacts to a corridor. Florida Statutes clearly indicate each local government must use concurrency as a tool to ensure an adequate level of service is maintained. FDOT recognizes the intent of Alachua County's mobility fee proposal. However, the areawide level of service provision is not a necessary component to achieve the overall goals. Areawide level of service is only appropriate in multimodal districts and do not make sense in areas that are not contiguous (such as the East District) and do not accurately reflect transportation demands on the primary roadway system.

The County's SIS Mitigation Plan references roadways that are over capacity based on approved development (reserved) trips that would cause LOS failure on SIS facilities. Development rights have been granted by the County and these potential transportation impacts must be accurately accounted in the concurrency process. FDOT believes that a more proactive approach is necessary to safeguard the State Road System and SIS.

Newberry Road (SR 26)

Alachua County Statement

"Currently this roadway operates at an acceptable LOS. With the addition of reserved trips over the next 10 years, portions of this roadway are projected to be over capacity by 2018. With the current slowdown in residential development, some of the reserved trips may be removed pushing the time frame to 2020 or later."

FDOT Comments:

Newberry Road (SR 26) is projected to fail by 2017 given historical background growth only. The proposed mobility fee does not address the development that is currently approved: the County's plan must realistically account for approved transportation impacts. Further, this plan does not demonstrate that the adopted level of service standards will be achieved and maintained as required by Rule 9J5.0055 Florida Administrative Code. Prior to adopting this mitigation plan, the County must conduct a corridor and transit feasibility study with all approved development trips as a baseline.

Alachua County Statement

"The County proposes to construct and upgrade SW 8th Avenue from I-75 to CR 241 to provide a parallel roadway to Newberry Road."

FDOT Comments:

SW 8th Avenue is parallel to SR 26; however, the County has not shown any evidence that this roadway will relieve traffic from SR 26. The County must conduct a corridor analysis of SR 26 to determine if the improvement this parallel corridor will cause enough traffic reduction on SR 26 to maintain an acceptable level of service with the inclusion of approved development trips and any development that will pay impact fees to fund this parallel roadway improvement.

Alachua County Statement

"Upon Newberry Road operating at 110% of its capacity, the County will commence design of a dedicated transit lane within the median of Newberry Road. Upon Newberry Road operating at 120% of its capacity, the County shall fully fund and commence construction within three (3) years of a dedicated transit lane within the median. Starting in 2015, express transit service shall be provided along Newberry Road from CR 241 (NW 143rd) to the University of Florida consistent with the headways adopted in the Comprehensive Plan Amendment Transit LOS Standards."

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Page 15 – Use of Funds

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Thank you for coordinating the review of the above mentioned amendment with FDOT. If you have any questions, please do not hesitate to contact me.

Sincerely,

Austin Chapman, Engineer Trainee for:
Thomas Hill, Growth Management Administrator
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
(904)360-5653

3 SP

FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS FORM C-7

NORTH CENTRAL FLORIDA
(Name of Regional Planning Council)
REGIONAL PLANNING COUNCIL
AMENDMENT REVIEW FORM
FY 2009-2010

SEP 28 2009

1. Local Government Name: **Alachua County**

2. Amendment Number: DCA No. 09-1, RPC No. 195,

- 1. Local Govt. No. CPA-01-09;
- 2. Local Govt. No. CPA-03-09
- 3. Local Govt. No. CPA-04-09
- 4. Local Govt. No. CPA-05-09
- 5. Local Govt. No. CPA-06-09

3. Is the RPC precluded from commenting on the proposed plan or element pursuant to s. 163.3184(5), F.S., or Rule 9J-11.0084, L.O.F.; or commenting on the proposed amendment pursuant to s. 163.32465(4)(b), F.S.? (YES) (NO) X

4. Date DCA Notified RPC that Amendment Package was Complete, if Applicable: 9-3-09.

5. Date Amendment Review must be Completed and Transmitted to DCA: 10-1-09

6. Date the Amendment Review was transmitted to DCA: 9-25-09

7. Description of the Amendment(s):

CPA-01-09: Amends the County Comprehensive Plan to provide for an alternative concurrency management system within the Urban Cluster consistent with s.163.3180(9)a, s. 163.3177(a), and s. 163.3177(b), Florida Statutes.

CPA-03-09: Amends Conservation and Open Space Element as follows: adopt "Alachua County Floridan Aquifer High Recharge Area" map and amend Policy 4.5.3 to indicate its use and applicability; amend related Policies 4.5.4; 4.5.5.5; 4.5.19 and 5.7.8 referring to the map and zones shown on the map; amend the definition of High Aquifer Recharge Areas to refer to the new map and zones.

CPA-04-09: Reclassifies 102 acres on Future Land Use Map from Rural/Agriculture to Preservation.

CPA-05-09 reclassifies 664 acres from Rural/Agriculture to Preservation.

CPA-06-09: Reclassifies 5,664 acres from Rural/Agriculture to Preservation.

Please complete the following table for each individual proposed amendment to the Future Land Use Map (FLUM) only:

| Local Govt Item No. | Existing FLUM Category | Proposed FLUM Category | Existing Maximum Density (DU/Acre) | Proposed Maximum Density (DU/Acre) | Existing Maximum Intensity (FAR) | Proposed Maximum Intensity (FAR) | Net Increase or (Decrease) in Maximum Density | Non-Residential Net Increase or (Decrease) in Potential Floor Area |
|---------------------|------------------------|------------------------|------------------------------------|------------------------------------|----------------------------------|----------------------------------|---|--|
| CPA-04-09 | Rural/Agriculture | Preservation | 0.2 | 0 | | | (0.2) | |
| CPA-05-09 | Rural/Agriculture | Preservation | 0.2 | 0 | | | (0.2) | |
| CPA-06-09 | Rural/Agriculture | Preservation | 0.2 | 0 | | | (0.2) | |

Add additional rows as necessary. Please PROVIDE TOTALS in bottom row.

8. Is the Amendment consistent with the Strategic Regional Policy Plan?

The County Comprehensive Plan, if amended as proposed by County items CPA-03-09, CPA-04-09, CPA-05-09, and CPA-06-09, will remain consistent with the regional plan. The County Comprehensive Plan, if amended as proposed by County item CPA-01-09, may be inconsistent with Regional Goal 5.1 and Regional Policies 5.1.8 and 5.1.9. Subsection 163.3177(10)(a), Florida Statutes, states that for purposes of determining consistency with the regional plan, the "regional plan shall be construed as a whole and no specific goal and policy shall be construed or applied in isolation from the other goals and policies in the plan..." In order to find the County Comprehensive Plan, as amended, inconsistent with the regional plan, it must be inconsistent with at least one other regional plan issue. Since the County Comprehensive Plan may be inconsistent with only one regional issue, the County Comprehensive Plan, as amended by County item CPA-03-09, remains consistent with the North Central Florida Strategic Regional Policy Plan.

9. Applicable Strategic Regional Policy Plan Goals and Objectives:

REGIONAL GOAL 5.1. Maintain a regional road network which operates at or above the minimum level of service standard contained in local government comprehensive plans for those segments located outside Transportation Concurrency Exception Areas.

Policy 5.1.8. Mitigate impacts created by development so as to maintain the minimum level of service standard on the Florida Intrastate Highway System (FIHS) as established by the Florida Department of Transportation.

Policy 5.1.9. Mitigate impacts created by development so as to maintain the minimum adopted level of service standard on non-FIHS roads identified in this plan as significant regional transportation facilities as established in local government comprehensive plans.

10. The effects on the Proposed Amendment on Regional Resources or Facilities Identified in the Strategic Regional Policy Plan:

Significant adverse impacts are not anticipated to occur to regional resources identified in the regional plan as a result of the amendments. Additionally, significant adverse impacts are not anticipated to occur to regional facilities as a result of County items CPA-03-09, CPA-04-09, CPA-05-09, and CPA-06-09. Significant adverse impacts may occur to segments of the Regional Road Network within the Urban Cluster as a result of County item CPA-01-09 as the item replaces traditional transportation concurrency management intended to maintain a minimum level of service standard for roads with an alternative transportation management system which promotes higher intensities and densities of use in exchange for promoting additional modes of transportation (bus, bicycle, and pedestrian).

11. Extra-Jurisdictional Impacts that would be Inconsistent with the Comprehensive Plan of the Affected Local Government:

Since the City of Gainesville is in the process of adopting a citywide Transportation Concurrency Exception Area, significant adverse extrajurisdictional impacts inconsistent with the City Comprehensive Plan are not anticipated to occur.

Analysis of the effects of the proposed amendments on the following issues to the extent they are addressed in the Strategic Regional Policy Plan on:

12. Compatibility among local plans including, but not limited to, land use and compatibility with military bases:

The amendments are compatible with the comprehensive plans of adjoining and nearby local governments (see 10, above). The amendments are also compatible with nearby military bases.

13. Impacts to significant regional resources and facilities identified in the Strategic Regional Policy Plan, including, but not limited to, impacts on groundwater recharge and the availability of water supply:

Significant adverse impacts to regional resources are not anticipated to occur as a result of the amendments. Significant adverse impacts are not anticipated to occur to regional facilities as a result of County items CPA-03-09, CPA-04-09, CPA-05-09, and CPA-06-09. Significant adverse impacts may occur to segments of the Regional Road Network within the Urban Cluster as a result of County item CPA-01-09 as the item replaces traditional transportation concurrency management intended to maintain a minimum level of service standard for roads with an alternative transportation management system which promotes higher intensities and densities of use in exchange for promoting additional modes of transportation (bus, bicycle, and pedestrian).

14. Affordable housing issues and designation of adequate sites for affordable housing:

Significant adverse impacts to affordable housing are not anticipated as a result of the amendments.

15. Protection of natural resources of regional significance identified in the Strategic Regional Policy Plan including, but not limited to, protection of spring and groundwater resources, and recharge potential:

Significant adverse impacts are not anticipated to occur to Natural Resources of Regional Significance identified in the North Central Florida Strategic Regional Policy Plan as a result of the amendments.

16. Compatibility with regional transportation corridors and facilities including, but not limited to, roadways, seaports, airports, public transportation systems, high speed rail facilities, and intermodal facilities:

See 10 and 11, above.

17. Adequacy and compatibility with emergency preparedness plans and local mitigation strategies including, but not limited to, the impacts on and availability of hurricane shelters, maintenance of county hurricane clearance times, and hazard mitigation:

The amendments are compatible with County emergency preparedness plans and local mitigation strategies.

18. Analysis of the effects of extra-jurisdictional impacts which may be created by the amendment:

See 10 and 11, above.

19. Objections, Recommendations, and Comments:

None.

20. Request for an Objections, Recommendations and Comments Report on the amendment:

The Council does not request the preparation of an Objections, Recommendations and Comments report.

21. Recommendation:

It is recommended that these findings be forwarded to the County and the Florida Department of Community Affairs

Council Action: At its September 24, 2009 meeting, the Council voted to adopt this report.



"Chapman, Austin"
<Austin.Chapman@dot.state.fl.us>

10/15/2009 04:54 PM

3 SP

To "Ray.Eubanks@dca.state.fl.us"
<Ray.Eubanks@dca.state.fl.us>
cc "Jonathan B. Paul" <JBPaul@AlachuaCounty.US>, "Hill,
Thomas" <Thomas.Hill@dot.state.fl.us>,
"anastasia.richmond@dca.state.fl.us"

bcc

Subject Alachua County 09-1

Mr. Eubanks,
FDOT is in receipt of Alachua County's follow-up letter dated 10/13/09 in regards to our meeting to resolve comments to Alachua County's 09-1 submittal. FDOT staff has been in training and has been unable to review this follow-up letter. Attached is a letter stating FDOT's opinion of tentative agreements for the resolution of transportation issues relating to Alachua County 09-1. We will review Alachua County's follow-up letter and look foreword to continued discussions aimed at resolving any outstanding issues.

Thanks,
Austin Chapman
Transportation Planner, EIT
Urban Area Planning
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
Austin.Chapman@dot.state.fl.us
(904)360-5653 (office)



Alachua County Proposed 09-1 After Meeting.pdf

parameters at the completion of construction. In support of this plan, the FDOT offers the following language for adoption within the Alachua County Comprehensive Plan: "When Newberry Road operates at 100% or greater of its approved capacity, the county will fund within three years the construction of 8th Avenue as a parallel facility. After the construction of 8th Avenue, when Newberry reaches 100% or greater of its approved capacity the County will fully fund and commence construction of dedicated transit lane within three years."

Thank you for coordinating the review of the above mentioned amendment with FDOT. If you have any questions, please do not hesitate to contact me.

Sincerely,

Austin Chapman, Engineer Trainee for:
Thomas Hill, Growth Management Administrator
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
(904)360-5653



Florida Department of
Environmental Protection
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

DATE: 10/1/09
TIME: 10:00 AM
BY: [illegible]

October 1, 2009

3 SP
10/2/09

Mr. Ray Eubanks
Plan Review and DRI Processing Team
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

RE: Alachua County 09-1, Comprehensive Plan Amendment ORC Review

Dear Mr. Eubanks:

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department) has reviewed the above-captioned package of proposed comprehensive plan amendments submitted by the Alachua County (County), under the required provisions of Chapter 163, Part II, *Florida Statutes (F.S.)*, and Chapters 9J-5 and 9J-11, *Florida Administrative Code (F.A.C.)*. Our comments address the potential impacts of the proposed policy changes on resources or facilities within the purview of the Department's regulatory and proprietary responsibilities. The Department provides the following comments and recommendations to assist your agency in developing the state's response to the proposed amendment.

The County proposes a series of text amendments to the Future Land Use, Transportation Mobility, Intergovernmental Coordination, and Capital Improvements Elements of the comprehensive plan (Plan). Of those amendments, the Department recommends the County clarify proposed Future Land Use Element (FLUE) Policy 1.6.5.2(4)¹. As currently proposed, FLUE policy 1.6.5.2(4) is unclear in its direction and, as such, is unpredictable in its implementation. The County could clarify the phrase "...that provide 100% of the allowable underlying land use density..." as it pertains to increases in intensity of development of subject properties.

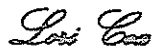
¹ "For projects that provide 100% of the allowable underlying land use density, an additional 10,000 square feet square feet of non-residential development is allowed with an additional 10,000 square feet of non-residential development allowed for each one (1) unit per acre above 100% of the underlying land use."

Mr. Ray Eubanks
October 1, 2009
Alachua County 09-1
Page 2 of 2

The Department recommends the County provide references to examples of "urban green streets" as noted in FLUE Policy 1.6.7.4 to assist in universal understanding and to further promote the concept.

Thank you for the opportunity to comment on the proposed amendment package. Should you have any questions or require further assistance, please call me at (850) 245-2168.

Yours sincerely,

A handwritten signature in cursive script that reads "Lori Cox".

Lori Cox
Office of Intergovernmental Programs

/lec



3 SP

FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

September 22, 2009

Mr. Ray Eubanks
Department of Community Affairs
Bureau of State Planning
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Re: Historic Preservation Review of the Alachua County 09-1 Comprehensive Plan Amendment

Dear Mr. Eubanks:

According to this agency's responsibilities under Section 163, *Florida Statutes*, and Chapter 9J-5, *Florida Administrative Code*, we reviewed the above document to determine if data regarding historic resources were given sufficient consideration in the request to amend the Alachua County Comprehensive Plan.

We reviewed proposed text amendments regarding multi-modal transportation and transit oriented development issues, in addition to amendments to the Future Land Use Map, to consider the potential effects of these actions on historic resources. While our cursory review suggests that the proposed changes may have no adverse effects on historic resources, it is the county's responsibility to ensure that the proposed revisions will not have an adverse effect on significant archaeological or historic resources.

If you have any questions regarding our comments, please feel free to contact Susan M. Harp of the Division's Compliance Review staff at (850) 245-6333.

Sincerely,

Laura A. Kammerer, Historic Preservationist Supervisor
Compliance Review Section
Bureau of Historic Preservation

xc: Ms. Susan Poplin

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

Director's Office
850-245-6333 • FAX 245-6333

Archaeological Research
850-245-6444 • FAX 245-6452

Historic Preservation
850-245-6113 • FAX 245-6117



"Scott, W Ray"
<scottra@doacs.state.fl.us>
09/21/2009 03:22 PM

To "Ray Eubanks" <ray.eubanks@dca.state.fl.us>
cc
bcc
Subject: FDACS LGCP Amendment Review

3 SP

Mr. Eubanks:

FDACS has reviewed the following LGCP amendments and has no objections, recommendations, or comments:

- Seminole County 09-1**
- Sumter County 09-2**
- Hillsborough County 09-2**
- Alachua County 09-1**
- Gilchrist County 09-1**
- Charlotte County 09-2**
- Hernando County 09-1**

Please call if you have any questions or comments:

W. Ray Scott
Conservation & Water Policy Federal Programs Coordinator
Office of Agricultural Water Policy
Florida Department of Agriculture and Consumer Services
The Capitol (PL-10)
Tallahassee, FL 32399-0810
(office) 850-410-6714
(mobile) 850-544-9871
(fax) 850-922-4936