



Board of County Commissioners

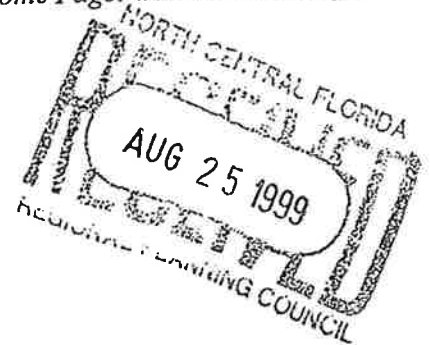
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August 23, 1999

Mr. Charles P. Justice, Executive Director  
North Central Florida Regional Planning Council  
2009 NW 67<sup>th</sup> Place, Suite A  
Gainesville, FL 32653-1603

RE: Review of "Response to Request for Additional Information" - Greenways of Gainesville Development of Regional Impact (DRI) application

Mr. Justice:

The Alachua County Public Works Department has reviewed the Greenways DRI second sufficiency response. Our comments are as follows:

**Question 19: Public Facilities: Stormwater Management:**

The County remains concerned about post-development discharge into the Blues Creek Drainage Basin. Blues Creek has been identified as an Outstanding Florida Water and development in this area needs to be coordinated with the County and other appropriate jurisdictions on its stormwater discharge into this basin.

**Revised Questions 21: Public Facilities - Transportation**

County Comments (numbers reflect number in applicants response)

- 1: The methodology letter references the two stage approach for measuring LOS service, it does not state that the second stage analysis will only be done on roads that have a significant and adverse impact from the Greenways DRI traffic. Currently, City, County and MTPO policies state that more detailed analysis be done on roads at 85% of capacity. Therefore, the second stage analysis should be done for all roads projected to operate at or over 85% of capacity. The applicants reference to the transportation uniform standard rule is irrelevant. The item under discussion concerns the understanding of the reviewing agencies based on the agreed upon methodology. The applicants response is not sufficient.



## CITY OF GAINESVILLE

*Department of Community Development*

August 25, 1999

Mr. Charles F. Justice  
Executive Director  
North Central Florida Regional Planning Council  
2009 NW 67th Place, Suite A  
Gainesville, Florida 32653

Subject: Greenways of Gainesville DRI – Second Response to Request for Additional Information / Final Traffic Study

Dear Mr. Justice:

The City of Gainesville Community Development and Public Works Departments have completed the review of the 2<sup>nd</sup> Response to Request for Additional Information and the Final Traffic Study for the Greenways of Gainesville DRI dated July 28, 1999.

On June 14, 1999 the Gainesville City Commission adopted a position statement that pertains to the DRI process and mitigation of transportation impacts. This statement is as follows:

“The City of Gainesville supports the funding of transit and non-motorized access to transit as an alternative approach to meeting transportation needs where roadway capacity is deficient, rights-of-way are restricted, and/or roadway/intersection widening is not compatible with the City’s sustainability and livability goals.”

The City’s Comprehensive Plan – Transportation Mobility Element, Overall Goal contains the following Transportation Policy that is applicable to mitigating transportation impacts:

“Establish a transportation system that enhances compact development and redevelopment and that is sensitive to the cultural and environmental amenities of Gainesville. The transportation system shall provide equal attention to pedestrian, bicycle, auto and mass transit needs. The system should provide vehicular, mass transit, and non-motorized access to activity centers, community facilities and neighborhood commercial areas. Safety and efficiency shall be enhanced by... an overall effort to enhance pedestrian mobility throughout the community by improvement and provision of safe crossings, complete sidewalk and trail systems...”

*Planning Division*

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Throughout the review process for the Greenways and Springhills DRI's the City has emphasized that transportation impacts must be mitigated by a multi-modal approach. This approach includes transit, bicycle/pedestrian facilities, intelligent transportation systems (ITS) and highway/intersection projects. Any mitigation proposal that does not address multi-modal transportation solutions is not consistent with the City's vision for transportation in the urban area. This position recognizes that there is a limit on highway/intersection widening projects and that congestion problems cannot be alleviated by constantly expanding roadways. It is also essential that the infrastructure for multi-modal projects be installed during the initial phases of development. This will provide the greatest opportunity to achieve a multi-modal transportation system.

The Public Works and Community Development Departments have formulated a list of multi-modal transportation projects that will mitigate the transportation impacts of Phase 1 of the Greenways DRI. The funding for these projects would be the developer's responsibility. This list of projects is consistent with the City's vision for the future of transportation in the urban area. Adoption of this list of projects will put in place the transportation infrastructure for a multi-modal transportation network for the Greenways of Gainesville DRI development.

The table on the next page outlines projects that are acceptable to City of Gainesville staff for addressing transportation impacts of the Greenways of Gainesville DRI. Approximate cost estimates are provided, but some may need to be revised by the project engineer in coordination with City staff. This list is proposed as an alternative to roadway and intersection widenings recommended in the ADA, which are ROW-restricted or incompatible with the City's vision for transportation and livability.

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Project	Improvement	ROW / Transit Operating	Construction / Transit Capital	Total
NW 43 St. sidewalks	10' wide asphalt path on the west side 2.3 miles, east side 1.7 miles from end of existing sidewalk northward to property entrance.		\$ 220,000	\$ 220,000
Transit Enhancement -- Rt. 43	Existing service to SFCC. Impacts intersection of NW 43 St. and NW 23 Ave. (Annual Operating and 2 buses)	\$ 277,008	\$ 500,000	\$ 777,008
Transit Enhancement -- Rt. 10	Existing service to SFCC. Impacts intersections of NW 43 St. with NW 23 Ave. & NW 39 Ave. (Annual Operating and 1 bus)	\$ 77,885	\$ 250,000	\$ 327,885
Transit Enhancement -- Rt. 8	Greenways to Shands (Annual Operating and 1 bus)	\$ 147,840	\$ 250,000	\$ 397,840
Transit Enhancement -- Rt. 6	Existing service on US441 and W. 6th St. Impacts intersection of US441 and NW 39 Ave. (Annual Operating and 1 bus)	\$ 68,723	\$ 250,000	\$ 318,723
Transit Enhancement -- Rt. 34A	New service Greenways to Oaks Mall (Annual Operating and 2 buses)	\$ 223,377	\$ 500,000	\$ 723,377
Park & Ride Lot w/ Shuttle on U. S. 441	35-space lot within big box parking lots at no additional cost. Transit operating, capital and support infrastructure including 6 buses.	\$ 340,560	\$ 1,500,000	\$ 1,840,560
U. S. 441 @ NW 6 St.	Signalize and add SB left-turn lane. (plus receiving lane and sidewalk connection on NW 6 St. for approx. 0.2 miles)	\$ -	\$ 400,000	\$ 400,000
Main St. Connector Rd.	New 2-lane w/ sidewalk, curb & gutter, and bikelanes (approx. 1 mile). Credit for 13% **.		\$ 1,000,000	\$ (130,000)
<b>TOTAL</b>				<b>\$ 4,875,393</b>

\* Exact distance should be verified. Asphalt construction is more reasonable as a short-term solution anticipating eventual 4-laning and should reduce short-term cost.

\*\* Allowance for provision of on-site connector road in Phase I. This percentage reflects the average anticipated vehicle reductions at critical area intersections in the peak direction and peak hour.

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## II. General Section.

1. Page 9-1. There are factual errors in the applicant's current submission. The Gainesville North Activity Center consists of 716 acres rather than 720; this information was presented at the Plan Board hearing of July 15, 1999 on the comprehensive plan amendment that is related to this DRI proposal, and was recommended by the Plan Board for approval. The proposed limitations of 6% Office use acreage and 12% Commercial ("Retail/Commercial", per the applicant's current DRI submission) consequently equate to a maximum of 85.92 acres of Retail/Commercial uses and 42.96 acres of Office uses. At a Floor Area Ratio (FAR) of 0.25, this would allow up to 935,689 sq. ft. of Retail/Commercial uses and up to 467,834 sq. ft. of Office uses. These totals do not match the totals of 629,160 sq. ft. of Office uses (315,810 sq. ft. Research Park/Corporate Office presumed to be Office use) and 959,000 sq. ft. of Retail/Commercial uses shown on Page 10-6 in Revised Exhibit 10-2. These comprehensive plan-based maximum totals also do not match the totals in the Final Traffic Study shown in Revised Table 21-A.1 on Page 21-4 of the Final Traffic Study (which has a total of 1,004,000 sq. ft. of Retail/Commercial and 268,350 sq. ft. of Office uses, not including the unlisted 315,820 sq. ft. of Research Park/Corporate Office). Per information from a previous submittal of the applicant, the movie theater use was allotted 35,000 sq. ft. and the hotel use was allotted 180,000 sq. ft. These square footages should be shown in Exhibit 10-2 and Table 21-A.1. The described differences in the square footages of Office and Commercial uses for this proposed DRI with respect to the comprehensive plan are significant. The applicant must revise Exhibit 10-2 and other pertinent exhibits and tables so that the proposed DRI development is internally consistent and consistent with the use limitations for the Gainesville North Activity Center as proposed in the pending comprehensive plan amendment. This will undoubtedly impact the trip generation information that has been submitted.
2. Page 10-2. The City is concerned that one of the available options listed for providing affordable housing is building off-site housing up to ten miles from the site. Although this option is available, it should be the last option after all others have been exhausted. Exhibit 24-26, Housing Demand/Supply Analysis is somewhat confusing and appears to be incomplete. The table is deficient in that it does not convey the need for very low and low income housing for each Phase. For instance, how will the 120 units that are required by the City's Comprehensive Plan be phased into the DRI? The applicant has indicated that the 120 required units are not included in Exhibit 24-26. The 120 required units should be allocated by phases and the table should be revised to show any deficits.
3. Page 10-6. See our comment no. 1 above. This exhibit must be revised so that it is consistent with the proposed comprehensive plan amendment.

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### Part III. Environmental Resources Impacts

4. Pages 10-5 and 15-1. The responses to the issue on these pages mentioned a comprehensive on-site mitigation plan that has been prepared and that the consultants have negotiated with the City in concept that the mitigation plan meets the intent of no net loss of wetlands acreage and function. The only discussion staff has had with the petitioner is the possibility of using littoral zones within stormwater facilities as compensation for loss in wetland acreage. It was also mentioned while meeting on this topic that wetland avoidance and minimization should be considered the main priority before any mitigation would be considered.
5. Page 13-1. Staff supports County staff's position that opportunities for avoidance and minimization of proposed wetland impacts remain to be explored.
6. Page 19-1. With regards to pre-treatment of stormwater runoff within wetland areas, the City of Gainesville will defer to the Suwannee River Water Management District for approval.
7. Page 19-2. There is discussion that a Residential Chemical Management Plan as part of the City's Planned Development zoning process is the appropriate time to address this issue. Plans such as these must be included in property restriction, neither the City nor the County will be able to administer and enforce such a plan that will focus on individual parcels within the DRI. The DRI must establish a program for administering such a plan.

### Part IV. Transportation Resource Impacts

8. Pages 21-3. The City does not support the applicant's contention that "the (DRI) development order will contain language requiring a monitoring/modeling study to more accurately identify actual conditions and needed improvement prior to commencing with any development beyond Stage 1." See comment no. 18.
9. Page 21-4. b) Applicant's response on page 27-1 is acknowledged. City staff has discussed this issue with school board staff and will recommend a DRI development order condition that will contain a reverter provision should the school board elect not to use the site for educational purposes after a defined period of time.
10. Page 21-5, Question 2, Concerns Table 21-A.2. If Table 21-A.2 is maintained as is in the Final Traffic Study, it must be titled "Existing Conditions as of (specific date for the data contained in table)". This is necessary to avoid confusion and misinformation. Since there are currently no vested development rights for the Greenways of Gainesville project, Table 21-A.2 contains an incorrect and unclear view of the most current transportation concurrency (level of service) and operating

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conditions information for roadways. The developers should note that transportation concurrency review will be based on data available at the submittal point for the development order and not based on historical information.

11. Page 21-6, Question 3. Sufficient. However, Stages 2 and 3 will require further study prior to any approvals. At that time, it may be necessary to re-adjust the methodology due to further development approvals (reserved trips, both from the City and County) for all relevant roadways.
12. Page 21-6, Question 4. The response is sufficient although there are some minor errors in the table that do not affect the outcome. (Table 21-E.3 has some errors from transcribing the SpringHills report data although these errors will not substantially affect the outcome. Segment S-29 has different endpoints than those reported in the SpringHills document. The SpringHills report does not reference segment numbers, but shows two different segments one going from NW 98 St. to NW 83 St.; and one from NW 83 St. to NW 43 St. However, the numbers reported in this Response are a reasonable extrapolation from the SpringHills figures. Segment S-15 has reversed the east/west numbers, but they are only different by three trips. Segment S-16 has also reversed the east/west numbers and has also reported 34 trips where the SpringHills document report 36. However, the errors are not of a magnitude that will alter the outcome. It is also possible that the peak directions are in error in the SpringHills report. Also of note, the planning year for the SpringHills figures are 2010 and the Greenways document is accepting them for traffic analysis in the year 2008.)
13. Page 21-7, Question 5. Table 21-B.4 in the Final Traffic Study shows Parcel 11 as "Free-Standing Discount Store." This should be "Free-Standing Discount Superstore" to match the previous two tables. Otherwise, the response is sufficient.
14. Page 21-7, Question 7. *Community Development Department* - The City of Gainesville disagrees with the use of the "critical lanes group" methodology for significant impact determination. The City agrees and supports comments from FDOT on this issue. Please see their comments for full details of the reason for not approving of this methodology. The NW 43rd Street ART-PLAN analysis assumes intersection improvements at NW 53rd Avenue, NW 39th Avenue, and NW 23rd Avenue, all of which must be completed for the results provided. City staff does not support this since there is currently inadequate ROW at NW 23rd Avenue to create the improvements shown, thus making this modification infeasible. Also, since the other intersection improvements are not shown in any funded transportation improvements program or long range transportation plan, it is inappropriate to use these modifications to run the ART-PLAN analysis. See also the City's comments on Question 2, Page 21-5 concerning the existing level of service issue. It is misleading to use old data for the analysis. Also, since the City does not agree with the critical lane groups methodology, it is doubtful that the



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- project traffic will not have a significant impact on segments in Year 2003. *Public Works Department* - In a meeting with the applicant's representatives on July 13, 1999, City staff discussed concerns about the feasibility and cost estimates of proposed projects on Table 21-F.5. Specifically, the City observed that the intersection widening at US441 and NW 39th Avenue is impractical due to severe ROW constraints. Staff also concluded that intersection widening on NW 43 St. and NW 23 Ave. was impractical due to ROW constraints. The ROW costs would be extremely high at this location, probably requiring condemnations, and the widening would be incompatible with adjacent neighborhoods and land uses. Safety concerns were discussed regarding signalization of US441 and NW 43 Street. Furthermore, this modification is based on future warrants that cannot currently be determined and may not be met if the internal connector street redirects trips. Acceptable multi-modal alternative solutions need to be proposed in place of these proposed intersection modifications. City staff also indicated that the modification at US441 and NW 6 Street should include receiving lanes and sidewalk extensions on NW 6 Street.
15. Page 21-8, Question 8. Response is insufficient. The NW 43rd Street ART-PLAN analysis assumes intersection improvements at NW 53rd Avenue, NW 39th Avenue, and NW 23rd Avenue, all of which must be completed for the results provided. City staff does not support this since there is currently inadequate ROW at NW 23rd Avenue to create the improvements shown, thus making this modification infeasible. Also, since the other intersection improvements are not shown in any funded transportation improvements program or long range transportation plan, it is inappropriate to use these modifications to run the ART-PLAN analysis. The City still requests that information about multi-modal improvements be included and addressed in the response.
  16. Page 21-9, Question 9. If the NW 43rd Street/NW 39th Avenue intersection was removed from the significant impact list due to the ART-PLAN analysis and critical lane groups methodology, this response is insufficient. See previous City comments concerning these two issues. There was no response to the City's request for information about NW 39th Avenue and NW 34th Street.
  17. Page 21-9, Question 10. The City has noted in item no. 1 above that there are problems associated with too much square footage for Office and for Retail/Commercial uses. Numbers need to be revised and resubmitted.
  18. Page 21-17. The applicant's suggested DRI development order condition regarding "monitoring and modeling methodology" is not acceptable as proposed. Staff anticipates a recommended DRI development order provision requiring a complete update of the ADA Final Traffic Study dated July 1999 for Stages 2 and 3, and will require that all mitigation measures be listed in an amended DRI development order. Methodology for the updated ADA traffic study will be reviewed by



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appropriate DRI review agencies, and the final decision on the methodology will be made by the City of Gainesville.

19. Page 21-24. FDOT Question Response. On the top of page 21-25 there appears to be conflicting information being provided to FDOT. The City cannot find any information about improvements being provided by the development at US 441 and NW 53rd Avenue prior to the completion of Stage 1 in the documents. And, this is not a project shown in the Transportation Improvement Plan and there are no funding sources for this improvement.
20. Page 21-27, Question 21, 1. Future studies will be required for Stages 2 and 3 because the number of reserved trips from other developments will undoubtedly increase as time goes by.
21. Page 21-27. Question 21, 2. Please clarify whether the inclusion of the SpringHills trips includes both Phases 1 and 2. Phases 1 and 2 have been approved by Alachua County.
22. Page 21-28, Section F, 1. Future studies will be required for Stages 2 and 3 because the number of reserved trips from other developments will undoubtedly increase as time goes by.
23. Page 21-28, Section F, 2. In the Final Traffic Study, the Constrained Facility for SR 26 should be listed as I-75 to NW 8th Avenue.
24. Page 21-28, Section F, 3. The response should reference Table 21-F.5 on page 21-52. There will be significant ROW costs for the projects at NW 43 St./NW 23 Ave. and US441/NW 39 Ave. These are currently listed with zero ROW cost, but the actual costs will make the projects cost prohibitive. ROW costs for construction at US441/University Avenue will also be cost prohibitive, although that modification does not address significant impacts from the Greenways DRI. Additionally, construction costs appear low in Table 21-F.5 for the projects at NW 43 St./NW 23 Ave., US441/NW 6 St. and US441/NW 39 Ave.
25. Page 21-29, Section F, 3. *Community Development Department* - Response is insufficient. The NW 43rd Street ART-PLAN analysis assumes intersection improvements at NW 53rd Avenue, NW 39th Avenue, and NW 23rd Avenue, all of which must be completed for the results provided. City staff does not support this since there is currently inadequate ROW at NW 23rd Avenue to create the improvements shown, thus making this modification infeasible. Also, since the other intersection improvements are not shown in any funded transportation improvements program or long range transportation plan, it is inappropriate to use these modifications to run the ART-PLAN analysis. *Public Works Department* - As stated previously the modifications at NW 43 St./NW 23 Ave. are severely ROW

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- constrained and are impractical to construct. Intersection widenings proposed along NW 43 St. are considered incompatible with adjacent neighborhoods and land uses, and the City's position on accommodating transportation demand. Therefore, acceptable multi-modal alternative solutions need to be proposed in place of these proposed intersection modifications.
26. Page 21-30, Access. The applicant will be responsible for the dedication of right of way for NW 37<sup>th</sup> Street from Street C (shown on Map H, March 1999 Response to Request for Additional Information) to the southern property line. The applicant will also be responsible for any future improvements within this right of way which may be required for pedestrian, bicycle and automotive access.
  27. Page 21-30, Section I. Response is insufficient. Cost estimates and strategies should have been provided on Page 21-9.
  28. Page 21-31, Other Comments. Response is insufficient. A specific detailing of multi-modal improvements (both on-site and off-site) with cost estimates has not been provided. Response is too general.
  29. Page 21-31, Other comments from Public Works Department. The City does not agree with the use of the critical lane groups methodology. The City agrees with FDOT comments on this issue.
  30. Page 21-31 to 21-32. There are no comments provided about Stages 2 and 3 where road widenings are still shown in Table 21-F.3. Although intersection widening is preferred to widening of the roadway segment, the City of Gainesville discourages intersection widening that negatively impacts other community goals. The City Commission is considering adoption of a maximum configuration policy for intersections. Although this maximum configuration would permit dual left-turn lanes, these should be viewed as a project of last resort to address unique or extreme conditions. The City does not intend to permit or encourage dual left-turn lanes throughout the community. Of particular concern are intersection widenings located within school walking zones (NW 43 St./NW 23 Ave., NW 43 St./NW 39 Ave., NW 43 St./NW 53 Ave., US 441/NW 23 Ave., US441/NW 16 Ave., US 441/NW 39 Ave., NW 34 St./NW 16 Ave.). ROW constraints will severely impact proposed intersection widenings at NW 43 St./NW 23 Ave., US441/NW 39 Ave., and US 441/University Avenue.

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**Part V. Human Resource Impacts**

31. Pages 24-1 & 24-2. Please see our comments in item no. 2 above.

Please call me at 334-5022 if you have any questions.

Sincerely,



Ralph Hilliard  
Planning Manager

cc: Thomas D. Saunders  
Teresa Scott  
Lea Gabbay  
Bill Lecher  
Michael Drummond

RW:dm