



# Florida Department of Transportation

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GOVERNOR

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THOMAS F. BARRY, JR.  
SECRETARY

August 20, 1999

Mr. Chuck Kiester  
Director of Regional Planning  
North Central Florida Regional  
Planning Council  
2009 N.W. 67 Place  
Gainesville, Florida 32606



RE: GREENWAYS OF GAINESVILLE, DRI  
Second Sufficiency Response - Comments

Dear Mr. Kiester:

The Department has reviewed the 2nd Sufficiency Response (Traffic Analysis-Question 21) of the Greenways of Gainesville, DRI. We also met with Mr. John Moore (the Applicant's traffic consultant) at his request (August 18, 1999) to discuss the "Final Traffic Study" dated July 1999. Based on our review of the transportation section and our discussion with the consultant we offer two sets of comments. The first are in general nature, the last are more technical. Attached are Mr. Rob Ayers comments as well. Please accept these comments for your consideration in reviewing the DRI's transportation section.

## I. ISSUES OF CONCERN:

First: According to Mr. Moore, the Applicant is in the process of negotiating with the City a mitigation plan for Stage-1. The City has apparently provided the developer with a list of projects that the Applicant will fund and/or construct which will be acceptable to the City as the mitigation for the approval of Stage-1 of the development. The list emphasizes transit enhancement projects, such as park & ride lots, bus routes and new busses, sidewalks, etc., as well as, the expeditious completion of the construction of the internal connector (from 43rd street to US 441). The total package is in the \$4 million to \$5 million range.

The Department is concerned that the mitigation plan will exclude necessary roadway improvements and will necessitate future State funding for such improvements. Furthermore, the City's counter offer proposal for mitigation ignores the traffic analysis and/or agencies inputs.

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Second: The Applicant is seeking an approval of the development for Stage-1 only, with the understanding that a "monitoring and modeling program" will proceed, and traffic studies will be submitted prior to commencement of Stage-2 and Stage-3, (years 2008 and 2013). It should be noted that Stage-1 of the development is only for a short period of time (from year 2000 to 2003). None of the projected growth will be noticeable. Substantial change in traffic is not likely to occur in such a short time.

Furthermore, it is not clear if the Applicant is seeking vesting rights for all three Stages and for all components of the development with exception of the traffic. Is the developer seeking vesting rights for Stage-1 of the development with plans to reanalyze the development in its totality for the last two Stages. How should we view than the mitigation package in leu of this partial approval? With respect to the traffic conditions and future growth on the network, it is unreasonable to develop without having an idea of the potential problems on the roads and without assessing the approximate cost of such improvements. We are not sure that the Applicant's proposal is a reasonable solution. We feel that the traffic analysis must provide an assessment of future impacts and a mitigation plan for all three Stages of the development.

Third: The Applicant's methodology used to assess the significance and adversity levels of intersections is not an acceptable method in this District. The methodology used by the consultant was a 1988 Tampa-Bay Regional Planning Council policy, based on the then current Highway Capacity Manual software procedures. In District-2 generally, if a project creates traffic problems along a corridor, the intersection in that corridor must be improved. The issue of critical movement analysis at an intersection comes into play when the intersection is the last one affected in the corridor (at the edge of the Study Area). Thus, critical intersections in the DRI's Area of Influence are always analyzed fully, utilizing the most current traffic data. The necessary improvements to remedy the failing intersections are listed and included in the list of recommended improvements in the Development Order. These improvements are subject to the mitigation plan. We expect the Applicant to be responsible for intersections which are failing due to impacts incurred by the development. The Applicant's proposed methodology should be reevaluated as it is not the current FDOT approved methodology.

## II. TECHNICAL QUESTIONS:

(1) Table 21-E.1 (year 2003); The ART\_PLAN analysis performed for the segment of NW 43rd Street (from SR 26 to NW 53rd Street) caused an improvement of the LOS (a change from "F" to "D"), thus making

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it not adverse. As part of the ART\_PLAN analysis, the Applicant has assumed improvements of NW 53rd Ave., NW 39th Ave., and NW 23rd Ave. intersections with 43rd Street; And the Applicant's response on page 21-32, states that: "The Applicant understands that the Greenways DRI will be responsible for the improvement of the above intersections". However, in Table 21-F.5. the Applicant has assumed only a portion of the project cost based on the significant/adverse test. It should be understood that the Applicant is responsible for funding and constructing the improvements of these intersections, and it should be part of the Development Order Conditions.

(2) Table 21-E.3. (year 2008); Adding the Springhills Development trips causes NW 39th Ave., from 97th to NW 43rd Street, to become adverse and significant during Stage-2 of the development. However, we anticipate that 39th Ave. will fail much sooner than year 2008. The Applicant should justify the results.

(3) Within the Trip Generation Table for Stage-3 (Year 2013), Research/Corporate Park land use was removed from Table 21.B.4. This reduced the number of daily trips from 59,618 to 56,408. The result of this is shown on links of SR 26, from 98th Street to I-75, and from I-75 to NW 8th Street, being reduced from 5.18% to 4.98% significance/adverse impacts. We anticipate that SR 26 will be seriously affected by this development and the analysis provided is not reflecting this problem. The Applicant should examine the analysis of SR 26 including the distribution of project trips to justify the results.

(4) The methodology used for calculating percent contribution of project traffic at intersections is based on evaluating the significance of critical lane groups, and based on a methodology never approved by the Department. This issue has been addressed above. We are, however, requesting that the intersections that are failing in both Stage-1 and Stage-2 are analyzed fully and all the necessary improvements are listed accordingly, and the fairshare calculations are documented as well.

(5) Map J is inconsistent with Table 21-E.1 which reflects project traffic as (%) percent of the service volumes at adopted standards. The Applicant should explain the discrepancy.

(6) Projections for intersections have been identified only for Stage-1; future needs for improving intersections need to be addressed for Stage-2, as requested at the methodology meeting.

(7) Roadway improvements for year 2013 Stage-3 (see page 21-37) have not been addressed. The Applicant is recommending another traffic study be performed at that time for this purpose. It is best to be able to anticipate the necessary improvements at the

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built out date of the development so that plans can be made to accommodate future traffic than to wait without planning for the future impacts on the roadway network.

(8) The distribution of the PM Peak-Hour directional project trips as shown on Exhibits 21-D.1, 21-D.2, and 21-D.3 are inconsistent with those noted in Tables 21-B.2, 21-B.3 and 21-B.4. For example, if the development is projected to generate 4,599 total PM Peak Hour trips by Stage-3 (as noted in Table 21-B.4) then, we should be able to track the 4,599 anticipated trips on exhibit 21-D.3 (not an estimated average of these trips on the links). Please explain.

If you have any questions regarding our comments, please do not hesitate to call me at SC# 824-5647.

Sincerely,



Lea E. Gabbay  
Growth Management Administrator  
DRI Coordinator

xc: Marlie Sanderson (NCFRPC)  
John J. Moore (GJKAL&R)  
Walker Bannings (DCA)  
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