



080393 A

Planning & Development Services

PO Box 490
Gainesville, FL 32602-0490
352-334-5022
352-334-2648 (fax)
www.cityofgainesville.org

May 20, 2009

Alachua County Planning Commission
c/o Alachua County Growth Management Department
10 SW 2nd Avenue
Gainesville, FL 32601-6294

Dear Alachua County Planning Commissioners:

City of Gainesville Staff appreciates the opportunity that the Alachua County Planning Commission provided for City Staff to address our concerns with County Growth Management Staff regarding the proposed Alternative Transportation Concurrency Management System and associated Comprehensive Plan Amendments. City and County Staff met and discussed our concerns, and we feel that several of the issues that could be resolved have been addressed.

It is City Staff's opinion that the TND, TOD and Activity Center land use planning concept represents the best opportunity for Alachua County to change the patterns of growth in the Urban Cluster. When tying the land use concept and a multi-modal transportation system based on transit together, the most difficult task is to determine whether the densities will be achieved to support the transit system. Additionally, funding for capital projects such as maintenance facilities to accommodate the expansion of the transit fleet may or may not be available when needed.

City of Gainesville Planning Staff recommends that the following policies be added to the Alachua County CPA 01-09 Comprehensive Plan amendments concerning the County's Alternative Transportation Concurrency Management System:

1. Alachua County shall pay a proportionate fair share of the new capital costs (such as, but not limited to, land and building costs) associated with the Regional Transit System (RTS) maintenance facilities, which may include satellite maintenance facilities. The proportionate fair share shall be based on the number of bus service bays in the maintenance facility required to service buses associated with the alternative transportation concurrency management system operating outside of Gainesville city limits. Alachua County shall sign an inter-local agreement for provision of the required funding and this shall be shown in the 5-Year Schedule of Capital Improvements.
2. The Alachua County mobility fee shall include capital costs associated with the required maintenance facilities for RTS transit service outside Gainesville city limits.

3. Alachua County shall support RTS as the primary transit provider in Alachua County in relation to the alternative transportation concurrency management system.

Amend Transportation Mobility Element Policy 1.1.6.10 as follows:

The County shall coordinate the provision of park and ride facilities with transit supportive developments located along Rapid Transit and Express Transit Corridors with the Capital Improvements Element and associated maps. Where applicable, transit park and ride facilities should be located at or in close proximity to transit stations and/or RTS facilities.

In addition, City Planning Staff has the following concerns:

1. The alternative transportation concurrency system is being adopted without the multi-modal transportation fee in place to know whether adequate funding will be available.
2. City Staff has extensive experience with redevelopment and how difficult it can be to achieve quality redevelopment. While there are mobility fee credits for redevelopment, this still may not be enough to encourage redevelopment of closer in areas. City Staff recommends a tiered mobility fee structure to add incentives for redevelopment. The tiered fee could be lower for areas already served by transit or within ¼ mile of I-75.
3. It is unclear from the documents how adequate operating funds for transit will be achieved. It is unclear what the difference is between the mobility fee and developer agreement funding.
4. The number of units that trips the threshold for required TND or TOD has been increased from the previous draft reviewed. City Staff is concerned that the resulting development pattern in some cases may be 149 unit subdivisions and splitting of parcels to circumvent the requirements, which does not reflect the County's vision as proposed in the amendments.
5. What happens to a transit route that completely fails to carry enough passengers? Will the route continue to be funded, and if so, how long?
6. The feasibility of the proposed dedicated transit lanes has not been studied by RTS nor has analysis been presented to RTS to support the formation of dedicated transit lanes along corridors where no transit service currently exists. RTS does prefer to operate services in dedicated lanes, and some of the dedicated facilities are consistent with RTS future service plans, but concerns remain about the location and feasibility of some of the proposed dedicated lanes. For example, no express transit service is proposed for SW 122nd Street, however, dedicated lanes

are proposed. RTS recommends further study before implementing all of the proposed dedicated transit lanes.

7. RTS requests that the BRT Feasibility Study Corridors lines shown on the Rapid Transit Corridors Map (shown inside city limits) be removed to avoid confusion. If the County wishes to include transit information inside city limits, existing route service should be shown.

City Staff (mainly RTS) would like to work with County Staff to review the data and analysis used to support the proposed express transit service routes and the potential park and ride locations that have been presented as part of Alachua County's alternative transportation concurrency management system. Without evidence to support these proposed routes and park and ride facilities, RTS has concerns about the efficiency and effectiveness of these services and therefore recommends that these proposed routes be allowed a demonstration period. If after a specified time, should any of the routes prove to be ineffective at transporting enough passengers, then they should be modified to improve productivity. RTS typically studies new route proposals for several months and in some instances up to a year before a new transit route is proposed.

Transit route planning practices typically considers the following:

- an inventory of existing land uses;
- residential and employment densities;
- connections to other transit services;
- feasibility of expanding complementary paratransit services;
- ability to maintain viable service headways;
- road operating conditions;
- customer requests for services;
- potential locations of safe and accessible bus stops.

City Staff looks forward to working with County Staff to address any issues prior to the final adoption of the Alachua County's alternative concurrency management system and reserves the right to make comments at the Alachua County Commission transmittal hearing. City Staff will also be providing, in the near future, an update to the City Commission on progress to date concerning coordination and comments on the County's Comprehensive Plan amendment package concerning the Alternative Transportation Concurrency Management System.

Sincerely,



Ralph Hilliard
Planning Manager

CC: Russ Blackburn, City Manager
Erik Bredfeldt, Planning and Development Services Director