May 6, 2010

Mr. Randall Reid, County Manager Alachua County 12 SE 1<sup>st</sup> Street Gainesville, Fl 32601

RE: Santa Fe Village Development of Regional Impact

Dear Mr. Reid,

After reviewing the *Santa Fe Village Development of Regional Impact* (DRI) proposal and associated CPA-06-04 the City is concerned that there are substantial issues that have not been addressed primarily in regards to the impacts on the transportation network and the provision of transit services. The following outlines these concerns and particular comments on the language of CPA-06-04.

- (1) The analysis of project impacts demonstrated that several roadway segments within City limits will be impacted by the project's traffic. The City is concerned that the proposed mitigation projects focusing primarily on the provision of transit services may not provide sufficient relief to congestion on the primary corridors impacted to the east of project such as NW 39<sup>th</sup> Avenue and NW 43<sup>rd</sup> Street. The provision of alternative transportation routes that enable connectivity and dispersal of traffic should be included in order to reduce vehicle miles travelled and travel delays along NW 39<sup>th</sup> Avenue and NW 43<sup>rd</sup> Street.
- (2) The Regional Transit System's (RTS) capacity to provide service will be significantly impacted by this project and others as development continues to occur at the fringe of the urban area. The need to provide complementary paratransit services must also be considered when evaluating any service expansion. Reliance on the continued expansion of services should only occur with RTS' agreement and concurrence on operational needs and costs associated with any new proposal.
- (3) Mitigation for the transportation impacts of Santa Fe DRI focuses primarily on provision of dedicated transit lanes plus operational funding for service between the development and the Oaks Mall. No consideration is given to existing route enhancement needs, as identified on the adopted Regional Transit System (RTS) Ten-Year Transit Development Plan (TDP), such as Routes 10 and 43 or to enhancements that may be needed at the Oaks Mall transfer station to accommodate the expected increase in service demand. A brief description of the routes and associated needs is provided below:
  - A Route 10 currently operates with a single bus at 80-minute headways (60-minute during AM peak) carrying over 75,000 passengers per year, and intersects 11 other routes. Current demand levels exceed route capacity. One additional bus is needed to increase service frequency to 40-minute headways. This route connects downtown to Santa Fe College via NW 16<sup>th</sup> Ave and University Ave.
  - A Route 43 currently operates with 2 buses at 60-minute headways carrying over 163,000 passengers per year, and intersects 21 other routes. Two additional buses are needed to increase service frequency to 30-minute headways. This route connects downtown to Santa Fe College via NW 43<sup>rd</sup> St.

Route 43 runs along NW 39<sup>th</sup> Ave adjacent to the proposed development. Both routes 10 and 43 converge at Santa Fe College enabling extensive connectivity and enhancing mobility. In addition, the TDP also identifies the need for a new Route 39 that would provide service along 39<sup>th</sup> Avenue between the Spring Hills area and the Gainesville Regional Airport. These transit enhancements are essential to increasing transportation mode choice at or near the site and could greatly improve established transit services that the community either uses today or has requested as part of the TDP public involvement process.

Another priority for RTS and the City is the planned RTS maintenance facility expansion which is critical to accommodate any transit service expansion. There is no mention of funding contribution towards this facility in this proposal.

## (4) Comments on the language of CPA-06-04:

- a. Conditions 2.5.1.1.b.5.q and 2.5.1.1.b.5.r The language as written "RTS shall be a reviewing entity along with the County and FDOT along State roadways" implies that coordination with RTS is needed only on State roadways. RTS should be a reviewing entity on all proposed transit facilities and services, both internal and external to the development.
- b. Condition **2.5.1.1.b.5.s**(**5**) extension of service (to the University of Florida) should be consistent with the Express Transit Corridors presented by Alachua County as part of the Mobility plan or coordinated with existing services.
- c. Condition **2.5.1.1.b.5.s**(**7**) no language addressing the need for capital improvements or the time period to receive capital funds is included. If the development is to rely upon transit service to mitigate transportation impacts, the capital improvements must include bus purchases to provide service, proportionate impact on maintenance facility and transit stations.
- d. The proposed allocation to fund transit operating costs is insufficient. The determination of operating cost also depends on hours of service each day or span of service. More details are needed on routes, service spans and frequencies in order to validate operating costs.
- e. Mass Transit The Capital Improvements Element mentions ATC/Intellitran, but they are no longer the provider of complementary paratransit service. MV Transportation is the current Community Transportation Coordinator (CTC) and provider of service.

The ability to maintain efficient and adequate levels of transit service while expanding the reach of the Regional Transit System is of primary concern to the City. The City expects to achieve resolution on these important issues and respectfully requests your prompt response.

Sincerely,

Russ Blackburn City Manager

Cc: Missy Daniels, Alachua County Growth Management Teresa Scott, Public Works Jesus Gomez, RTS Director