

LEGISLATIVE #

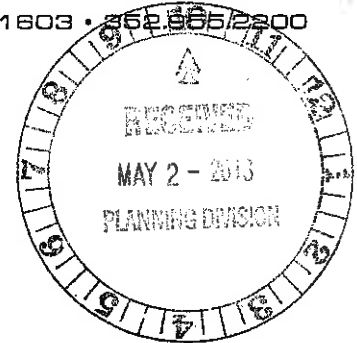
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April 30, 2013

Ms. Onelia Lazzari, AICP, Principal Planner
City of Gainesville
P.O. Box 490, Mail Station 11
Gainesville, FL 32627

RE: Regional Review of City of Gainesville Comprehensive Plan Draft Amendment
Draft City Ordinance 120370

Dear Onelia:

At its regularly scheduled meeting held April 25, 2013, the Council reviewed the above-referenced items. Subsequent to their review, the Council voted to adopt the enclosed report.

If you have any questions concerning this matter, please do not hesitate to contact Steven Dopp, Senior Planner of the Planning Council's Regional and Local Government Programs staff, at : 352.955.2200, extension 109.

Sincerely,

Scott R. Koons, AICP
Executive Director

Enclosure

xc: Ray Eubanks, Florida Department of Economic Opportunity
Anastasia Richmond, Florida Department of Economic Opportunity
Dean Mimms, AICP, City of Gainesville

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**FLORIDA REGIONAL COUNCILS ASSOCIATION
LOCAL GOVERNMENT COMPREHENSIVE PLAN AMENDMENT REVIEW FORM 01**

Regional Planning Council: North Central Fl
Review Date: 4/25/13
Amendment Type: Draft Amendments

Regional Planning Council Item No.: 55
Local Government: City of Gainesville
Local Government Item No: Ordinance 120370
State Land Planning Agency Item No: 13-2ER

Date Mailed to Local Government and State Land Planning Agency: 4/26/13

Pursuant to Section 163.3184, Florida Statutes, Council review of local government comprehensive plan amendments is limited to adverse effects on regional resources and facilities identified in the strategic regional policy plan and extrajurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the region. A written report containing an evaluation of these impacts, pursuant to Section 163.3184, Florida Statutes, is to be provided to the local government and the state land planning agency within 30 calendar days of receipt of the amendments.

DESCRIPTION OF AMENDMENT

The amendment package consists of nine separate comprehensive plan amendment items which contain numerous changes to the City Comprehensive Plan. The amendments implement the recommendations contained in the City Comprehensive Plan Evaluation and Appraisal Report. The amendment package, including a draft ordinance, staff report and associated exhibits comprise over 700 pages. Excerpts from the amendment package are attached.

Among the changes to the City Comprehensive Plan include replacing the City Transportation Concurrency Exception Area program with a Transportation Mobility program and replacement of the City High Aquifer Recharge Map with the Alachua County Floridan Aquifer High Recharge Area Map.

The Evaluation and Appraisal Report-based amendment does not propose any significant changes to the land use classifications or significant changes to the intensity of use of lands on the City Future Land Use Map. A new Future Land Use Map is included in the amendment package which adds lands recently annexed to the City which have been previously reviewed by the Council as part of prior City Comprehensive Plan amendments.

1. ADVERSE EFFECTS TO SIGNIFICANT REGIONAL RESOURCES AND FACILITIES IDENTIFIED IN THE STRATEGIC REGIONAL POLICY PLAN

The City contains numerous roads which are part of the Regional Road Network as identified in the North Central Florida Strategic Regional Policy Plan: The amendments remove the City Transportation Concurrency Exception Area program as well as transportation concurrency requirements,

Regional Policy 5.1.1 considers impacts to Regional Road Network to be adequately mitigated within municipalities, urban service areas, and urban development areas where the local government comprehensive plan contains goals and policies which implement Transportation Best Practices. The amendments retain numerous policies which implement Transportation Best Practices contained in the Regional Plan. Therefore, potential future adverse impacts to the Regional Road Network are adequately mitigated.

The City also contains Stream-to-Sink Watersheds which are identified and mapped as Natural Resources of Regional Significance in the Regional Plan. The new City high aquifer recharge map is the same map included in the Regional Plan. Furthermore, the City Comprehensive Plan continues to include policy direction which minimizes significant adverse impacts to Stream-to-Sink Watersheds, as well as the Floridan Aquifer, consistent with the goals and policies of the Regional Plan. Therefore, significant adverse impacts to Natural Resources of Regional Significance are not anticipated as a result of the amendments.

2. EXTRAJURISDICTIONAL IMPACTS INCONSISTENT WITH THE COMPREHENSIVE PLANS OF LOCAL GOVERNMENTS WITHIN THE REGION

Significant adverse extrajurisdictional impacts are not anticipated to occur as a result of the amendments.

Request a copy of the adopted version of the amendments?

Yes X No
Not Applicable

It is recommended that these findings be forwarded to the City and the Florida Department of Economic Opportunity.

Council Action: At its April 25, 2013 meeting, the Council voted to adopt this report.



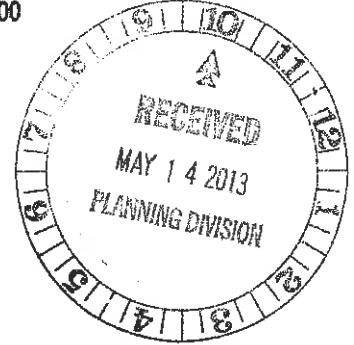
St. Johns River Water Management District

Hans G. Tanzler III, Executive Director

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

May 14, 2013

D. Ray Eubanks, Administrator
Plan Review and Processing
Division of Community Planning and Development
Florida Department of Economic Opportunity
107 E. Madison Street
Tallahassee, FL 32399-4120



Re: City of Gainesville Proposed Comprehensive Plan Amendment #13-2ER

Dear Mr. Eubanks:

St. Johns River Water Management District (SJRWMD) staff have reviewed the above-referenced proposed comprehensive plan amendment. SJRWMD staff review, as outlined in *Florida Statutes*, focused on flood protection and floodplain management, wetlands and other surface waters, and regional water supply as they relate to important state resources and facilities that will be adversely impacted by the amendment if adopted. Because the City of Gainesville is located within the jurisdictions of SJRWMD and the Suwannee River Water Management District (SRWMD), SJRWMD staff coordinated with SRWMD staff. SJRWMD staff have no comments on the proposed amendment because no adverse impacts to important state resources and facilities were identified.

If you have any questions or need additional information, please contact me at (386) 312-2369 or sfitzgib@sjrwmd.com.

Sincerely,

Steve Fitzgibbons, AICP, Intergovernmental Planner
Office of Communications and Intergovernmental Affairs

cc: Dean Mimms, City of Gainesville
Onelia Lazzari, City of Gainesville
Ana Richmond, Florida Department of Economic Opportunity
Scott Koons, North Central Florida Regional Planning Council
Jim Quinn, Florida Department of Environmental Protection
Steve Minnis, Suwannee River Water Management District

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Eubanks, Ray

From: DCPexternalagencycomments
Subject: FW: City of Gainesville 13-2ER (proposed)

From: Owens, Jillaine M. [mailto:Jillaine.Owens@dep.state.fl.us]
Sent: Friday, May 03, 2013 12:33 PM
To: Eubanks, Ray
Subject: City of Gainesville 13-2ER (proposed)

5/6/13

Mr. Eubanks:

Re: City of Gainesville 13-2ER (proposed); Expedited Comprehensive Plan Amendment Review

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (DEP) has reviewed the above-referenced proposed amendment under the procedures of Chapter 163, *Florida Statutes (F.S.)*. The Department conducted a detailed review that focused on potential adverse impacts to important state resources and facilities, specifically: air and water pollution; wetlands and other surface waters of the state; federal and state-owned lands and interest in lands, including state parks, greenways and trails, conservation easements; solid waste; water and wastewater treatment; and, where applicable, the Everglades ecosystem.

Based on our review of the proposed amendment, the Department has found no provision that requires comment under the laws that form the basis of the Department's jurisdiction.

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) 245-2187.

Sincerely,



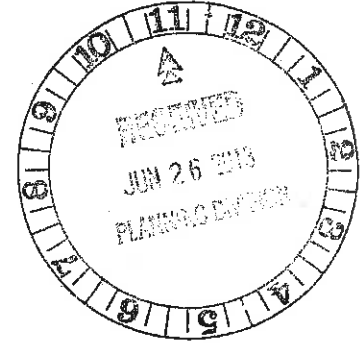
Jillaine M. Owens, ES III
Office of Intergovernmental Programs

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).

Rick Scott
GOVERNOR



Jesse Panuccio
EXECUTIVE DIRECTOR



June 24, 2013

The Honorable Edward B. Braddy
Mayor, City of Gainesville
Post Office Box 490, Station 11
Gainesville, Florida 32627-0490

Dear Mayor Braddy:

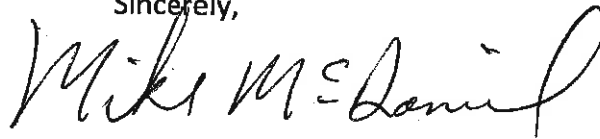
The Department of Economic Opportunity has completed its review of the proposed comprehensive plan amendment for the City of Gainesville (Amendment No. 13-2ER), which was received and determined complete on April 25, 2013. We have reviewed the proposed amendment in accordance with the state coordinated review process set forth in Sections 163.3184(2) and (4), Florida Statutes (F.S.), for compliance with Chapter 163, Part II, F.S. The Department of Economic Opportunity does not identify any objections to the proposed amendment and this letter serves as the Objections, Recommendations and Comments Report. Review comments received by the Department of Economic Opportunity from the appropriate reviewing agencies are enclosed.

We are providing two technical assistance comments consistent with Section 163.3168(3), F.S. The Department of Economic Opportunity's technical assistance comments will not form the basis of a challenge. They are offered either as suggestions which can strengthen the City's comprehensive plan in order to foster a vibrant, healthy community or are technical in nature and designed to ensure consistency with Chapter 163, F.S.

The City should act by choosing to adopt, adopt with changes, or not adopt the proposed amendment. Also, please note that Section 163.3184(4)(e)1, F.S., provides that if the second public hearing is not held and the amendment adopted within 180 days of your receipt of the Department of Economic Opportunity comments, the amendment shall be deemed withdrawn unless extended by agreement with notice to the Department of Economic Opportunity and any affected party that provided comment on the amendment. For your assistance, we have enclosed the procedures for final adoption and transmittal of the comprehensive plan amendment.

If you have any questions related to this review, please contact Valerie Jenkins, Planning Analyst, at (850) 717-8493, or by email at valerie.jenkins@deo.myflorida.com.

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,
Comprehensive Planning Manager

MM/vj

Enclosures: Objections, Recommendations and Comments Report
Agency Comments
Procedures for Adoption

cc: Ms. Onelia Lazzari, AICP, Principal Planner, City of Gainesville Planning and Services
Department
Mr. Scott R. Koons, AICP, Executive Director, North Central Florida Regional Planning
Council

**OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT
FOR
THE CITY OF GAINESVILLE**

PROPOSED COMPREHENSIVE PLAN AMENDMENT 13-2ER

CONSISTENCY WITH CHAPTER 163, PART II, FLORIDA STATUTES

The Department has the following comments regarding the City of Gainesville's proposed Comprehensive Plan Amendment:

Comments

Comment 1: The Housing Element Policy 1.3.1 commits the City to provide adequate sites for low-income, very low-income, extremely low-income, and moderate low income families through the year 2023. However, Section 163.3177(6)(f), F.S., was recently amended to also include workforce housing as defined in Section 380.0651(3)(h), F.S. Therefore, the Department recommends that the City revise Policy 1.3.1 to include workforce housing to the types of housing sites that will be provided within the City.

Comment 2: The Public Schools Facilities Element Policy 1.1.3 is revised to strike the last sentence which states, "For the purposes of this planning assessment, existing or planned capacity in adjacent school concurrency service areas shall not be considered." However, the deletion appears to be inconsistent with Section 6.3 of the Interlocal Agreement which has a similar provision. Therefore, to maintain consistency with both the Interlocal Agreement and policies of the other Alachua County school elements, the City should maintain the sentence.



Florida Department of Transportation

2198 Edison Avenue
Jacksonville, FL 32204

RICK SCOTT
GOVERNOR

ANANTH PRASAD, P.E.
SECRETARY

May 21, 2013

Ray Eubanks
Plan Review Administrator
Department of Economic Opportunity
Bureau of Community Planning
Caldwell Building
107 East Madison Street MSC 160
Tallahassee, FL 32399-6545

RE: City of Gainesville Proposed 13-2ER

Dear Mr. Eubanks:

FDOT has reviewed the City of Gainesville proposed evaluation and appraisal report (EAR) based amendment to the Comprehensive Plan for consistency with the requirements of Chapter 163 Florida Statutes. The FDOT's review of the amendment to the Comprehensive Plan focused on the transportation related issues to facilities of state importance and offers the following recommendations and comments for your consideration:

Technical Assistance Comments

Future Land Use Element

Policy 4.1.1 (Page 18 of FLUE): This policy provides standards for the land use categories within the City.

FDOT Comments: The City does not include density or intensity standards for the Education land use category. The FDOT recommends the City coordinate the review process for the construction of educational facilities with FDOT when accessing state roads.

Policy 4.3.4.g.4 (Page 34 last paragraph): Policy 4.3.4 provides site specific policies that govern the Plum Creek development. This section of the policy requires the developer to provide *"any transportation modifications that are site related and required for operational or safety reasons, such as, but not limited to, new turn lanes into the development, driveway modifications, or new traffic signals, and such operational and safety modifications shall be unrelated to the Transportation Mobility Program requirements."*

FDOT Comments: The FDOT recommends this policy does not preclude capacity enhancements as a mitigation strategy.

Policy 4.3.5.z.egg (Page 43): Policy 4.3.5 provides site specific policies that govern the Hatchet Creek Planned Use District. This section of the policy requires the developer to provide *"any transportation modifications that are site related and required for operational or safety reasons, such as, but not limited to, new turn lanes into the development, driveway modifications, or new traffic signals, and such operational and safety modifications shall be unrelated to the Transportation Mobility Program requirements."*

FDOT Comments: The FDOT recommends this policy does not preclude capacity enhancements as a mitigation strategy.

Transportation Mobility Element

Policy 1.1.1 (Page 1): This policy adopts an LOS "C" on I-75 and an LOS "E" for all other roadways within the City.
FDOT Comments: FDOT policy is for local governments to adopt an LOS "D" on state roads in urbanized areas. The FDOT recommends the City amends this policy to include an adopted LOS standard of "D" for I-75.

Policy 6.1.3 (Page 14): Policy 6.1.3 states *"The City shall use the City of Gainesville Engineering Design & Construction Manual for street design and geometrics."*

FDOT Comments: The FDOT recommends this policy is changed to include FDOT coordination and approval for street design and geometrics on state roads.

Policy 10.1.17.b (Page 32 and 33): This policy states *"an existing DRI that was approved and built prior to the adoption of the TMPA may be granted TMPA credits for redevelopment or expansion if all of the following requirements are met. All other Chapter 380, F.S., DRI requirements, except those concerning transportation concurrency, shall continue to apply."*

b. *"At least one public transit route serves the DRI and operates at 15-minute frequencies during RTS a.m. and p.m. peak hours."*

FDOT Comments: A maximum distance to transit stops is not included within Policy 10.1.17.b. To better serve a multimodal environment, the FDOT recommends at least one public transit route serves the DRI and operates at 15-minute frequencies during RTS a.m. and p.m. peak hour and bus stops are located within ¼ mile of all development within the DRI.

Policy 10.1.18 (Page 33): Policy 10.1.18 states *"The City shall collect trip generation information for developments within the TMPA. For redevelopment sites, the City shall also collect information about trip credits for the previous use of the property."*

FDOT Comments: For development that accesses a state road, FDOT policy is when property is vacant for more than a year, then existing uses are not considered and impacts are reevaluated. The FDOT recommends the City establishes an expiration timeline for trip credits and vested trips.

Thank you for coordinating the review of the City of Gainesville proposed EAR-based amendment with FDOT. If you have any questions, please do not hesitate to contact me.

Sincerely,

Richard Prindiville, Traffic Analyst for:
Thomas Hill, Growth Management Administrator
Florida Department of Transportation
Jacksonville Urban Office
2198 Edison Avenue, MS 2812
Jacksonville, FL 32204-2730
Phone: (904)360-5664
Email: richard.prindiville@dot.state.fl.us

CC: Thomas Hill FDOT District-2

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May 24, 2013

Mr. D. Ray Eubanks, Plan Processing Administrator
Division of Community Development
Department of Economic Opportunity
107 East Madison Street
Tallahassee, Florida 32399-4120

Dear Mr. Eubanks:

Re: Gainesville 13-2ER

Thank you for the opportunity to review the Gainesville 13-2 ER amendment package. According to the department's responsibilities under Section 163.3184(3), Florida Statutes, I reviewed the amendment considering provisions of Chapter 163, Part II, F.S., and to determine whether the proposal, if adopted, would have potential to create adverse effects on public school facilities.

The package includes revisions to apply recommendations of the recent evaluation and appraisal of the plan, including an update of the public school facilities element. The proposed amendments to the element maintain strong policies to promote school planning coordination. The amendment also reflects the 2012 update of the Alachua County Public School Interlocal Agreement, with one exception. The city proposes revision of policy 1.1.3 to strike the last sentence. The deletion appears to be inconsistent with Section 6.3 of the interlocal agreement, which provides that for purposes of a planning assessment the existing or planned capacity in adjacent school concurrency service areas shall not be considered. To maintain consistency with both the interlocal agreement and policies of the other Alachua County school elements, the city should retain the sentence.

THOMAS H. INSERRA
DIRECTOR, OFFICE OF EDUCATIONAL FACILITIES

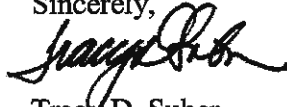
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Mr. D. Ray Eubanks
May 24, 2013
Page 2

Again, thank you for the opportunity to review and comment. I am available to provide technical assistance to the staffs of the city and the school district to address the comment in this letter. If I may be of assistance, please contact me at (850) 245-9312 or Tracy.Suber@fldoe.org.

Sincerely,



Tracy D. Suber
Growth Management
and Educational Facilities Policy Liaison

TDS/

Enclosure

cc: Ms. Vicki McGrath, Alachua County School District
Ms. Ana Richmond and Ms. Valerie Jenkins, DEO/State Land Planning Agency



Planning & Development Services

Station 11
PO Box 490
Gainesville, FL 32627-0490
352-334-5022
352-334-2648 (fax)
www.cityofgainesville.org

July 25, 2013

Mr. Mike McDaniel
Florida Department of Economic Opportunity
Division of Community Development
107 E. Madison Street, MSC-160
Tallahassee, FL 32399-4120

RE: Response to Objections Recommendations and Comments Letter on City of
Gainesville Amendment No. 13-2ER

Dear Mr. McDaniel:

This letter is a response to your letter dated June 24, 2013, which served as the Objections, Recommendations and Comments (ORC) Report for the City's Evaluation and Appraisal Comprehensive Plan amendments. The City was pleased that the Florida Department of Economic Opportunity (FDEO) did not identify any objections to the proposed amendments to our Comprehensive Plan.

FDEO did provide two technical assistance comments: one concerned Housing Element Policy 1.3.1 and one concerned Public Schools Facilities Element Policy 1.1.3 (provided by Tracy Suber with the Florida Department of Education). Based on statements in your letter, it is the City's understanding that these two technical assistance comments will not form the basis of a challenge to the City's Comprehensive Plan.

In addition to those two technical assistance comments included in the Department of Economic Opportunity ORC Report, technical assistance comments from the Florida Department of Transportation (FDOT) were enclosed with your letter. FDOT had three comments on the Future Land Use Element and four on the Transportation Mobility Element.

This letter explains the actions the City has taken in response to each of the comments from FDEO and FDOT. Please see below for a list of the comments and the City's response.

1. **Comment 1 from FDEO.** The Housing Element Policy 1.3.1 commits the City to provide adequate sites for low-income, very low-income, extremely low-income, and moderate income families through the year 2023. However, Section 163.3177(6)(f), F.S., was recently amended to also include workforce housing as defined in Section 380.0651(3)(h), F.S. Therefore, the Department recommends that the City revise Policy 1.3.1 to include workforce housing to the types of housing sites that will be provided within the City.

City's Response:

Housing Element Policy 1.3.1 has been revised to include affordable workforce housing to the types of housing sites that will be provided within the City. The change is shown in the ordinance as double-underline.

2. **Comment 2 from FDEO.** The Public Schools Facilities Element Policy 1.1.3 is revised to strike the last sentence which states, "For the purposes of this planning assessment, existing or planned capacity in adjacent school concurrency service areas shall not be considered." However, the deletion appears to be inconsistent with Section 6.3 of the Interlocal Agreement which has a similar provision. Therefore, to maintain consistency with both the Interlocal Agreement and policies of the other Alachua County school elements, the City should maintain the sentence.

City's Response:

Public Schools Facilities Element Policy 1.3.1 has not been revised in response to this comment. The City of Gainesville Planning staff strongly believes that analyzing public schools facilities for land use changes in a different way from a School Concurrency capacity analysis creates confusion and could lead to a misinterpretation of school capacity by someone contemplating development in the City of Gainesville. The City staff raised this objection during the drafting of the Interlocal Agreement and indicated to the Alachua County School Board staff that the sentence would be deleted in the City's Comprehensive Plan update. No objections to that were raised by the Alachua County School Board staff.

3. **Comment 1 from FDOT.** Future Land Use Element Policy 4.1.1 provides standards for the land use categories within the City. The City does not include density or intensity standards for the Education land use category. The FDOT recommends the City coordinate the review process for the construction of educational facilities with FDOT when accessing state roads.

City's Response:

Future Land Use Element Policy 4.1.1 has not been revised in response to this comment. The vast majority of property in the Education land use is regulated by

the University of Florida (UF) Campus Master Plan. The City does not review any development plans for UF property regulated by the Campus Master Plan. Most of the remaining Education land use property is owned by the Alachua County School Board and contains public schools. The City also does not review plans for Alachua County public schools and does no permitting on these properties. Therefore, any coordination required when accessing state roads would involve coordination with either UF or the Alachua County School Board directly.

4. **Comment 2 from FDOT.** Future Land Use Element Policy 4.3.4.g.4 provides site specific policies that govern the Plum Creek development. This section of the policy requires the developer to provide “*any transportation modification that are site related and required for operational or safety reasons, such as, but not limited to, new turn lanes into the development, driveway modification, or new traffic signals, and such operational and safety modifications shall be unrelated to the Transportation Mobility Program requirements.*” The FDOT recommends this policy does not preclude capacity enhancements as a mitigation strategy.

City's Response:

Future Land Use Element Policy 4.3.4.g.4 has not been revised in response to this comment. City Planning staff discussed this issue with FDOT in a phone conference call on 7/23/13 and explained that the City agrees that this policy (as written) does not preclude capacity enhancements as a mitigation strategy. As explained to FDOT, Policy 4.3.4.g.1 does require transportation mitigation in addition to the operational/safety modifications required by Policy 4.3.4.g.4.

5. **Comment 3 from FDOT.** Future Land Use Element Policy 4.3.5.gg provides site specific policies that govern the Hatchet Creek Planned Use District. This section of the policy requires the developer to provide “*any transportation modifications that are site related and required for operational or safety reasons, such as, but not limited to, new turn lanes into the development, driveway modifications, or new traffic signals, and such operational and safety modifications shall be unrelated to the Transportation Mobility Program requirements.*” The FDOT recommends this policy does not preclude capacity enhancements as a mitigation strategy.

City's Response:

Future Land Use Element Policy 4.3.5.gg has not been revised in response to this comment. City Planning staff discussed this issue with FDOT in a phone conference call on 7/23/13 and explained that the City agrees that this policy (as written) does not preclude capacity enhancements as a mitigation strategy. As explained to FDOT, Policy 4.3.5.gg does require transportation mitigation in addition to the operational/safety modifications. Specifically, the policy includes

the statement, "The development shall be required to meet any transportation mobility requirements in effect at the time of application for development review." The City's transportation mobility requirements are laid out in Goal 10 and associated policies of the Transportation Mobility Element, which are being adopted with this amendment.

6. **Comment 4 from FDOT.** Transportation Mobility Element Policy 1.1.1 adopts an LOS "C" on I-75 and an LOS "E" for all other roadways within the City. FDOT policy is for local governments to adopt an LOS "D" on state roads in urbanized areas. The FDOT recommends the City amend this policy to include an adopted LOS standard of "D" for I-75.

City's Response:

Transportation Mobility Element Policy 1.1.1.b. has been revised to show the LOS for I-75 as "D". The changes are shown as double-underline and double-strike-through in the ordinance.

7. **Comment 5 from FDOT.** Transportation Mobility Element Policy 6.1.3 states "*The City shall use the City of Gainesville Engineering Design & Construction Manual for street design and geometrics.*" The FDOT recommends this policy is changed to include FDOT coordination and approval for street design and geometrics on state roads.

City's Response:

Transportation Mobility Element Policy 6.1.3 has been revised to indicate that the City of Gainesville Engineering Design & Construction Manual will be used for street design and geometrics on City-maintained roadways. The changes are shown as double-underline in the ordinance. In addition, existing Transportation Mobility Element Policy 6.1.5 already requires collaboration with the State and County concerning roadway design.

8. **Comment 6 from FDOT.** Transportation Mobility Element Policy 10.1.17.b states "*an existing DRI that was approved and built prior to the adoption of the TMPA may be granted TMPS credits for redevelopment or expansion if all of the following requirements are met. All other Chapter 380, F.S. DRI requirements, except those concerning transportation concurrency shall continue to apply. b. At least one public transit route serves the DRI and operates at 15-minute frequencies during RTS a.m. and p.m. peak hours.*" The FDOT comments that a maximum distance to transit stops is not included within Policy 10.1.17.b. To better serve a multimodal environment, the FDOT recommends at least one public transit route serves the DRI and operates and 15-minute frequencies during RTS a.m. and p.m. peak hour and bus stops are located within ¼ mile of all development within the DRI.

City's Response:

Transportation Mobility Element Policy 10.1.17.b has not been revised in response to this comment. As indicated during a phone conference call with FDOT staff on 7/23/13, Policy 10.1.17 already includes a sub-policy c. that requires "the DRI to allow transit service to enter the site and drop off/pick up passengers as close as possible to main entry points to facilitate transit user and comfort and safety. An appropriate number of bus shelters, as determined by RTS during development review, shall be located at the site." Therefore, since the City's requirement is more stringent than the ¼ mile FDOT recommendation, no revisions have been included.

9. **Comment 7 from FDOT.** Transportation Mobility Policy 10.1.18 states, "*The City shall collect trip generation information for developments within the TMPA. For redevelopment sites, the City shall also collect information about trip credits for the previous use of the property.*" FDOT recommends that for development that accesses a state road, FDOT policy is when property is vacant for more than a year, then existing uses are not considered and impacts are reevaluated. The FDOT recommends the City establishes an expiration timeline for trip credits and vested trips.

City's Response:

Transportation Mobility Element Policy 10.1.18 has not been revised in response to this comment. Trip credits are not used for operational/safety type analysis. They are used solely for the purpose of determining transportation mitigation associated with the City's Transportation Mobility Program. FDOT is free to deal with developments that access state roads in whatever manner they choose. In addition, adding language about expiration timelines is too specific for a comprehensive plan and would be better handled in the City's Land Development Code.

Thank you for the opportunity to respond to the technical assistance comments on the City's Evaluation and Appraisal Comprehensive Plan amendments. We trust that the changes made in the amendment package and responses concerning technical comments will resolve all issues.

Sincerely,



Onelia R. Lazzari, AICP
Principal Planner

xc: Ana Richmond, FDEO

Valerie Jenkins, FDEO
Thomas Hill, FDOT
Richard Prindiville, FDOT
Tracy Suber, FDOE
Vicky McGrath, Alachua County School Board