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City of Gainesville

Lauren Poe, Mayor



October 17, 2022

Brian Austin
Transportation Planner
Florida Department of Transportation
2198 Edison Avenue MS 2806
Jacksonville, FL 32204-2730

RE: City of Gainesville Comprehensive Plan Amendment No. 22-03ESR under Expedited State Review

Dear Mr. Austin:

The City of Gainesville has considered your letter on behalf of the Florida Department of Transportation (FDOT), received on September 2, 2022, pursuant to the expedited state review process in Section 163.3184, Florida Statutes. The FDOT's letter provided comment regarding the City's proposed Comprehensive Plan amendment (Amendment No. 22-03ESR)("Amendment"). Pursuant to Section 163.3184(3)(b)4.c., Florida Statutes, the FDOT's authority to provide comments is limited to issues within the FDOT's jurisdiction as it relates to transportation resources and facilities of state importance. The FDOT's letter alleged that the City's Amendment could add up to 274,500 daily trips to the transportation network and could potentially impact segments of the State Highway System (SHS).

The City understands that the proposed change in Land Use designation from Single-Family Residential to Residential Low-Density can be expected to generate additional trips. However, the FDOT's projection of an additional 274,500 daily trips is not a reasonable extrapolation of the anticipated traffic generation resulting from the Amendment. Any additional trips will occur incrementally as either existing vacant residential properties are built on or currently developed properties are gradually redeveloped. Within the entire City of Gainesville, there are currently only 194 vacant properties in the former Single-Family Residential designation. The average size of these properties is approximately 1/4-acre.

The Neighborhood Residential zoning district which will implement the Amendment is limited to 12 du/acre, which means that the maximum development potential for the majority of these properties will be limited to a 3-unit triplex. Currently within the City of Gainesville, all existing Single-Family designated properties are permitted to have one primary residence and two Accessory Dwelling Units (ADUs) without an owner residency requirement. As such, the City's Amendment is an incremental change from what is currently allowed and the City's Land Development Code includes both current and newly proposed regulations that will mitigate any potential impacts to surrounding areas. Finally, the Amendment is anticipated to lower Vehicle Miles Traveled (VMT) by encouraging greater density within the urbanized area of the City of Gainesville through directing new housing development near existing transit routes and job centers as opposed to outside the urban core.

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Additional trips created by the Amendment over time will be mitigated with mechanisms to address the potential impacts to the transportation network via the Transportation Mobility Program Area (TMPA) as outlined in the Transportation Element of the City's Comprehensive Plan. The TMPA strategies coupled with the City's Vision Zero program that prioritizes people versus cars, land use policies that encourage provision of higher densities and mixed land uses, and investments in multimodal infrastructure and programs will continue to encourage the use of alternative transportation modes maintaining the downward trends in traffic volumes experienced over the last several years. In addition, the City is in the process of updating its TMPA program to better align with future needs as land uses and associated transportation patterns continue to evolve. This effort is expected to encompass a comprehensive traffic analysis and forecasting of impacts and needs using the Gainesville/Alachua County Regional Transportation Model including the adoption of the Amendment. The transportation needs are also evaluated and mitigated through the Transit Development Plan which is updated every 5 to 10 years; the next major update is expected in 2024.

It is the City's intent to continue to coordinate this effort with FDOT, furthering the strong partnership developed over the years while seeking to achieve common goals for a safe transportation system that ensures the mobility of people and goods and promotes the quality of life and economic vitality of the community.

Sincerely,



Lauren Poe
Mayor
City of Gainesville