



# City of Gainesville

Department of  
Sustainable  
Development

September 17, 2024

Jacob Linton  
Planner I  
FDOT District Two  
2198 Edison Avenue  
MS 2806  
Jacksonville, FL 32204-2730

**SUBJECT: City of Gainesville Response to Proposed Comprehensive Plan Amendment (24-1ESR)**

Dear Jacob Linton,

The City of Gainesville has received and considered your letter on behalf of the Florida Department of Transportation received August 21, 2024, pursuant to the expedited state review process in Section 163.3184, Florida Statutes. The FDOT's letter referenced Amendment No. 24-01ESR (a prior Amendment submitted by The City and responded to by FDOT on August 12, 2024) but presumably was intended to refer to Amendment 24-02ESR as the subject matter addressed details of that proposed amendment. The FDOT's letter stated that the City's amendment (Amendment No. 24-02ESR) could add up to 348,561 daily trips to the transportation network and could potentially impact every segment of the State Highway System (SHS) within the city.

Amendment 24-02ESR is the combination of two proposed ordinances that will consolidate existing RSF 1-4 single-family land use categories into one Single Family category and amend allowable densities from 8 dwelling units per acre to 12, amend lot sizes to allow for smaller lots, and to amend other associated standards. The intent of these proposed ordinances is to provide more flexibility for development in single-family districts thereby increasing overall housing options and supply. In turn, this will continue to further the City's goal of densifying its urbanized areas to reduce urban sprawl, create greater efficiencies for resources like transportation, and promote an economically and culturally vibrant community.

The City understands that the proposed amendment can be expected to generate additional trips. However, FDOT's projection of 348,561 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 parcels are developed or currently developed properties are gradually redeveloped according to established economic and market trends. For context, the City has roughly 194 vacant



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parcels within its jurisdiction averaging roughly  $\frac{1}{4}$  acre in size. Since 2021, including new single family subdivisions, the City has seen 697 single family homes.

The Single-Family zoning district, which will implement the proposed amendment, is limited to 12 dwelling units per acre. The existing RSF 1-4 districts allow from 3.5 to 8 dwelling units per acre. The existing RC district, a residential district that is associated with the City's historic neighborhoods and Historic Districts, is limited to 12 dwelling units per acre. Limiting the proposed Single Family district to 12 units per acre, mimicking existing and historic residential land use patterns, is an incremental change. Further, the City's Land Development Code includes regulations that mitigate potential impacts to surrounding areas from new development. Finally, the amendment is anticipated to lower vehicle Miles Traveled (VMT) by encouraging greater density within the urbanized area of the City through directing new housing development near existing transit routes and job centers as opposed to outside the urban core.

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 pedestrian safety, 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 and maintain the downward trends in traffic volumes the City has 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. The effort includes a comprehensive traffic analysis and forecasting of impacts and needs using the Gainesville/Alachua County Regional Transportation Model and is expected to conclude in the summer of 2025. The City's transportation needs are also evaluated and mitigated through the Transit Development Plan which is updated every 5 to 10 years and is currently in progress.

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



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Sincerely,

Forrest Eddleton, AICP  
Director of Department of Sustainable Development  
City of Gainesville