



City of Gainesville

Department of
Sustainable
Development

September 17, 2024

James Stansbury
Chief
Bureau of Community Planning and Growth
107 E. Madison Street
Caldwell Building
Tallahassee, FL 32399

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

Dear James Stansbury,

The City of Gainesville has received and considered your letter on behalf of the Florida Department of Commerce (FloridaCommerce) received August 29, 2024, pursuant to the expedited state review process in Section 163.3184, Florida Statutes. The City recognizes and accepts that the Department of Commerce's letter regarding the City's proposed Comprehensive Plan Amendment (Amendment No. 24-02ESR) identified no comments related to adverse impacts to important state resources and facilities within FloridaCommerce's authorized scope of review.

The City also recognizes the Technical Assistance Comment provided regarding data and analysis of potential demands on public facilities. As with any proposal that could potentially increase density, the primary anticipated impacts are expected to be related to transportation and stormwater and as such, the City has programs and policies in place to mitigate these impacts.

Amendment No. 24-01ESR would allow developments to utilize up to a 50 percent density bonus for developments that meet certain criteria, principally the provision of affordable housing units as proposed in a separate but related amendment to the City's Land Development Code establishing requirements for mandatory inclusionary housing. The proposed amendment is intended to provide a regulatory mechanism for increased density allowances in cases where inclusionary zoning regulations within the Land Development Code require the provision of affordable housing units. The increased density allowance will provide the City a mechanism to provide additional density to fully offset costs to the developer pursuant to F.S. 166.04151.

The City understands that the proposed amendment can be expected to generate additional trips. However, it is anticipated that the majority of additional trips will occur incrementally as either existing



City of Gainesville

Department of Sustainable Development

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 parcels within its jurisdiction averaging roughly $\frac{1}{4}$ acre in size. Since 2021, including newly annexed 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.

In regards to stormwater management, new development will of course create impervious surfaces and will be required to provide stormwater management systems that mitigate the impacts of increased runoff. The City reviews each development application over certain thresholds (3 dwelling units or 1001 square feet of building area or impervious areas greater than 1000 square feet) to assess compliance with state and local stormwater management regulations. Newly platted single family subdivisions will be required to meet existing stormwater regulations and provide management facilities. For new infill



City of Gainesville

Department of Sustainable Development

development, the majority will be reviewed for potential impacts to surrounding properties and public facilities via the City's permit single family home permit review process on a case-by-case basis.

Thank you again for your review and advisory comment. The City has taken the comment under advice and will continue with the programs and policies outlined above and in a response letter to the Florida Department of Transportation regarding the same proposed Amendment. If you have any questions regarding this letter, please feel free to contact me at 352-393-5023 or eddltonfk@gainesvillefl.gov.

Sincerely,

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