



City of Gainesville

Department of
Sustainable
Development

September 17, 2024

Achaia Brown
Transportation Planning Manager
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 Achaia Brown,

The City of Gainesville has received and considered your letter on behalf of the Florida Department of Transportation received August 12, 2024, 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. 24-01ESR). The FDOT's letter stated that the City's amendment could add up to 915,677 daily trips to the transportation network and could potentially impact every segment of the State Highway System (SHS).

The proposed change to the Future Land Use Map (FLUM) 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, FDOT's projection of 915,677 daily trips is not a reasonable extrapolation of the anticipated traffic generation resulting from the amendment. It is important to note that the allowance for increased density is only one of a multitude of other regulatory offsets proposed by the City in the related Land Development Code amendment and it is highly unlikely that every



City of Gainesville

Department of Sustainable Development

development will utilize the full 50% density bonus in light of practical concerns related to site development constraints. Additionally, the mandatory component of the City's Inclusionary Zoning program provides for a smaller density bonus (30%) in exchange for setting 10% of the development's at 80% of Area Median Income. Density bonuses above 30% require that the development set aside a greater number of units and/or provide those units at a deeper affordability level also thereby reducing the likelihood that the additional density will be exercised by every eligible development.

The proposed amendment is anticipated to have its greatest effect in land use categories that are predominantly multifamily developments within the urbanized area of the City of Gainesville. For context, between 2021 and January 2024 the city saw a total of 29 developments with more than 10 units, 20 of which were more than 50 units. These developments amounted to 4115 units, all of which are near existing transit routes and job centers. As such, it is anticipated that the amendment will continue to reduce vehicle miles traveled by encouraging dense housing in transit supportive, walkable areas of the City.

Additional trips created by the amendment over time will also 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 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 will include any additional density expected from this amendment. Adoption of the new Mobility Plan and TMPA requirements is expected 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



City of Gainesville

Department of
Sustainable
Development

system that ensures the mobility of people and goods and promotes the quality of life and economic vitality of the community.

Sincerely,

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