



# 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. 24-01ESR) 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 important to note that the allowance for increased density is only one of a multitude of



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other regulatory offsets proposed by the City in the related Land Development Code amendment and it is highly unlikely that every 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.

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



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square feet of building area or impervious areas greater than 1000 square feet) to assess compliance with state and local stormwater management regulations. As such, it is expected that any new development affected by the proposed amendment will capture and or treat stormwater on site. It is important to note that neither the Suwannee River Water Management District nor the St. John's River Water Management District provided comments on the proposed amendment.

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 [eddletonfk@gainesvillefl.gov](mailto:eddletonfk@gainesvillefl.gov).

Sincerely,

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