

Alachua County Responses to Florida Department of Community Affairs Objections, Recommendations, and Comments (ORC) Report on Alachua County Comprehensive Plan Amendment 01-09:

Relevant sections from DCA's Objections and Recommendations and Comments (ORC) Report are reproduced below, followed by the County response. Underlined policies are changes from transmittal draft to adoption draft.

I. CONSISTENCY WITH CHAPTER 163, F.S. AND RULE 9J-5, F.A.C.

DCA OBJECTION #1: The County has proposed to implement an area-wide level of service standard for all functionally classified County and Non SIS State Roadways within each Transportation Mobility District. However, for this approach to be meaningful the County should average the level of service on similar facilities within the designated area serving common origins and destinations.

DCA RECOMMENDATION #1: The County should group north/south roads and east/west roads for averaging within each district.

ALACHUA COUNTY RESPONSE TO OBJECTION #1:

The methodology for calculating the area-wide level of service has been revised consistent with DCA recommendation #1. The underlined language below indicates the changes to Transportation Mobility Element (TME) Policy 1.1.4 3. and the Capital Improvements Element (CIE) Policy 1.3.2. C. 3. d.

Policy 1.1.4 (TME)

3. Within each Transportation Mobility District, achievement of the LOS for all functionally classified County and Non SIS State Roadways shall be based on Areawide LOS. The Areawide LOS analysis shall be divided into north-south and east-west roadways. The Areawide LOS shall be determined by dividing the sum (Σ) of total traffic by the sum (Σ) of the total maximum service volume at the adopted LOS standard for all functionally classified County and Non SIS State Roadways.

Policy 1.3.2. C. 3. (CIE)

- d. Within each Transportation Mobility District, achievement of the LOS for all functionally classified County and Non SIS State Roadways shall be based on Areawide LOS. The Areawide LOS analysis shall be divided into north-south and east-west roadways. The Areawide LOS shall be determined by dividing the sum (Σ) of total traffic by the sum (Σ) of the total maximum service volume at the

adopted LOS standard for all functionally classified County and Non SIS State Roadways.

A revised LOS analysis (see page 8) has also been conducted to demonstrate that based on the infrastructure identified in the Capital Improvements Element each district is projected to operate at an acceptable LOS based on the revised LOS methodology.

DCA OBJECTION #2: Chapter 163.3180, F.S., requires mitigation for development impacts to facilities on the Strategic Intermodal System (SIS) and coordination with the Department of Transportation on the mitigation plan. Although the County has provided a draft mitigation plan and policies requiring coordination with the Florida Department of Transportation the County has not proposed to include the mitigation plan as part of the Comprehensive Plan. Additionally, the timing of the proposed mitigation for Newberry Road (SR 26) does not ensure this facility will operate at an acceptable level of service standard.

DCA RECOMMENDATION #2: The County should revise the amendment to include the SIS Mitigation Plan as part of the Comprehensive Plan. The County may wish to adopt the SIS Mitigation Plan by reference within the Capital Improvements Element. If adopted by reference, the County should include the appropriate title, date, author, and include the document with the adopted amendment package. The Department also recommends the County revise the SIS Mitigation Plan to require when Newberry Road operates at 100% or greater of its approved capacity, the County will fund within three years the construction of 8th Avenue as a parallel facility. After the construction of 8th Avenue, when Newberry reaches 100% or greater of its approved capacity the County will fully fund and commence construction of dedicated transit lanes within three years.

ALACHUA COUNTY RESPONSE TO OBJECTION #2:

The Transportation Mobility Element and the Capital Improvements Element have been revised to indicate that the Strategic Intermodal System (SIS) Mitigation Plan is adopted by reference as part of the Comprehensive Plan. The formal title of the report is the Strategic Intermodal System (SIS) Mitigation Plan. The author has been identified as the Alachua County Growth Management Department and the date of the plan has been established as January 26th, 2010. The following are the policies that have been revised (underlined) to reference the Strategic Intermodal System (SIS) Mitigation Plan.

Policy 1.1.4 (TME)

4. The LOS for SIS facilities within the Urban Cluster shall be addressed through the Strategic Intermodal System (SIS) Mitigation Plan (Alachua County Growth Management Department January 26th, 2010). The SIS Mitigation Plan identifies mitigation measures such as the construction of parallel roadways serving similar travel demand patterns, dedicated transit lane(s), access management and

transit service. Mitigation projects, consistent with the SIS Mitigation Plan, shall be included in the Multi-Modal Transportation Capital Improvements Program. The SIS Mitigation Plan may be amended, in consultation with FDOT, during updates to the Capital Improvements Element.

Policy 1.3.2. C. 3. (CIE)

- e. The LOS for SIS facilities within the Urban Cluster shall be addressed through the Strategic Intermodal System (SIS) Mitigation Plan (Alachua County Growth Management Department January 26th, 2010). The SIS Mitigation Plan identifies mitigation measures such as the construction of parallel roadways serving similar travel demand patterns, dedicated transit lane(s), access management and transit service. Mitigation projects, consistent with the SIS Mitigation Plan, shall be included in the Multi-Modal Transportation Capital Improvements Program. The SIS Mitigation Plan may be amended, in consultation with FDOT, during updates to the Capital Improvements Element.

Policy 1.1.6.1 The annual update of the Capital Improvements Element (CIE) shall include a roadway LOS analysis that demonstrates that the Areawide LOS for each Transportation Mobility District is being achieved. The annual update shall include a LOS analysis of SIS facilities and shall demonstrate consistency with the Strategic Intermodal System (SIS) Mitigation Plan (Alachua County Growth Management Department January 26th, 2010). The annual update shall also demonstrate that progress is being made toward achieving the identified bicycle, pedestrian and transit LOS. To measure and evaluate the effectiveness of the Transportation Mobility Districts policies, the annual update of the CIE shall also include a vehicle miles of travel (VMT) and mode share analysis for each Transportation Mobility District and the Urban Cluster.

Policy 1.1.6.12 Large Scale Comprehensive Plan amendments to the Future Land Use Element or Map that result in a greater transportation impact shall require the entity requesting the amendment to demonstrate that the adopted LOS standards for the affected Transportation Mobility District and impacted Strategic Intermodal System (SIS) roadways are achieved and that additional required infrastructure, including infrastructure identified in the SIS Mitigation Plan (Alachua County Growth Management Department January 26th, 2010), is fully funded. Applicants may only include projects that are fully funded and scheduled to commence construction within one (1) year of approval of the Comprehensive Plan Amendment.

The Strategic Intermodal System (SIS) Mitigation Plan requires the County, within three (3) years of Newberry Road (SR 26) from Interstate 75 to CR 241 (143rd Street) reaching its capacity, to fully fund and commence construction of SW 8th Avenue as a parallel roadway to Newberry Road (SR 26). SW 8th Avenue is identified in the Capital Improvements Element and is projected to be under construction and substantially completed by 2015. SW 8th Avenue will provide a parallel facility one (1) mile south of Newberry Road from Interstate 75 to CR 241 (143rd Street).

The transmitted version of the Strategic Intermodal System (SIS) Mitigation Plan included a provision whereby the County would commence design of a dedicated transit lane on Newberry Road when the roadway reached 110% of its capacity. Upon Newberry Road reaching 120% of its capacity, the County within three (3) years would fully fund and commence construction of the dedicated transit lane on Newberry Road.

The Alachua County Board of County Commissioners based on the recommendation from the Growth Management Department will not agree to construct the dedicated transit lane on Newberry Road upon the roadway reaching 100% of its capacity as recommended. The recommendation, as written would essentially require the County to undertake both the design and construction of SW 8th Avenue and the dedicated transit lane at the same time. Traffic patterns do not change instantly once a new roadway is constructed. There is a transition period for residents, commuters, business and visitors to change their travel routes.

The condition as written would compel the County to construct the dedicate transit lane regardless of whether or not development occurred within the Urban Cluster. In excess of 50% of the traffic on Newberry Road toward is from the cities of Alachua, High Springs, Newberry and Trenton, as well as Gilchrist County. Further, Alachua, High Springs and Newberry are all proposing Transportation Concurrency Exception Areas (TCEA) which have the potential to produce a significant increase in development and traffic and do not include mitigation for Newberry Road within the Urban Cluster. Further, the City of Newberry is considering a 2,600 plus single use residential development with no mixture of uses, no provision for transit and no mitigation. That one project alone, even if no new development occurred within the Urban Cluster of Alachua County, would result in Newberry Road operating below its adopted LOS and would compel the County to construct the dedicated transit lane.

To address the potential for unmitigated impact from local governments west of the Urban Cluster, the following are proposed changes (underline and strikethrough) to the Strategic Intermodal System (SIS) Mitigation Plan in response to the recommendation regarding the construction of the dedicated transit lane on Newberry Road.

Upon Newberry Road reaching its maximum service volume, minus traffic from municipalities and counties to the north and west of the Newberry Road and CR 241 (NW 143rd Street) intersection, the operating at 110% of its capacity, the County will commence design and of a dedicated transit lane within the median of Newberry Road. ~~Upon Newberry Road operating at 120% of its capacity, the County shall fully fund and commence construction within three (3) years of a dedicated transit lane within the median. The County or FDOT may enter into an interlocal agreement to construct the dedicated lanes upon Newberry Road reaching its maximum service volume, if the municipalities and counties to the north and west of the Newberry Road and CR 241 (NW 143rd Street) intersection fully fund the construction of the dedicated transit lane.~~ Starting in 2015, express transit service shall be provided along Newberry Road from CR 241 (NW 143rd) to the University of Florida consistent with the headways adopted in the Comprehensive Plan Amendment Transit LOS Standards. The impacted segments for Newberry Road shall be consistent with those shown in the Capital Improvements Element. The required limits of the proposed improvement and this policy shall be revisited during updates to the Capital Improvements Element should portions of the area annex into a municipality.

The Capital Improvements Element identifies SW 8th Avenue, the dedicate transit lane and the construction of NW 23rd Avenue as three specific infrastructure projects that will mitigate the impact from development within the Urban Cluster on Newberry Road from Interstate 75 to CR 241 (143rd Street). The corridor analysis (see page 9) demonstrates that the capacity of the Newberry Corridor (Newberry Road & SW 8th Avenue) from Interstate 75 to SW 122nd Street (Parker Road) will provide a corridor capacity of 51,100 using the FDOT Generalized Tables. In 2025, the projected daily traffic volume on the Newberry Corridor is 46,776. By 2030, the project daily traffic volume on the Newberry Road Corridor is 51,280; 180 daily trips over the Generalized Tables capacity 20 years from now. The Capital Improvements Element identifies both a dedicated transit lane and the construction of NW 23rd Street from Interstate 75 to NW 122nd Street (Parker Road) one (1) mile north of Newberry Road before 2030. Thus, the County will be providing adequate roadway capacity on the Newberry Corridor by 2030.

The attached analysis demonstrates that the capacity of the Newberry Corridor (Newberry Road & SW 8th Avenue) from SW 122nd Street (Parker Road) to SW 143rd Street will provide a corridor capacity of 51,100 using the FDOT Generalized Tables. In 2030, the projected daily traffic volume on the Newberry Corridor is 39,717; 11,383 daily trips under the Generalized Tables capacity 20 years from now. The Capital Improvements Element identifies both a dedicated transit lane and the construction of NW 23rd Street from Interstate 75 to NW 122nd Street (Parker Road) one (1) mile north of Newberry Road before 2030. Thus, the County will be providing adequate roadway capacity on the Newberry Corridor by 2030.

The County Mobility Plan emphasizes the development of a gridded roadway network of collector roadways and interconnected local roadways. The projects in the Capital

Improvements Element will adequately address roadway capacity needs for future development within the Urban Cluster. The one caveat is the potential for significant development and traffic from local governments west of the Urban Cluster.

ADDITIONAL ALACHUA COUNTY POLICY CHANGES IN RESPONSE TO FDOT:

FDOT District 2 stated a concern about Transportation Mobility Element Policy 1.1.6.3 which limits roadways within the Urban Cluster to no more than a total of four (4) through motor vehicle lanes. FDOT was specifically concerned about Interstate 75 and the conflict with the recently adopted 2035 Interstate 75 Master Plan. To address FDOT's concern, the policy was amended as follows:

Policy 1.1.6.3 Except for Interstate 75, Roadways shall be limited to no more than a total of four (4) through motor vehicle lanes. All new bridges over Interstate 75 shall be four (4) lane roadways with provisions for transit, bicycle lanes, sidewalks and/or multi-use paths

FDOT District 2 requested that the County modify Transportation Mobility Element Policy 1.1.4 and Capital Improvements Element Policy 1.2.4 A. 1. to specify that the FDOT Generalized Tables be the standard of measure for Strategic Intermodal System (SIS) Roadways. The County understands the intent of the request and the current stated policy of FDOT District 2 to utilize the Generalized Tables. However, the County has concerns about placing such a restriction in the Comprehensive Plan for Strategic Intermodal System (SIS) Roadways. The policy revision, as requested by District 2, would preclude the County from utilizing the ART-Plan and HIGH-Plan analysis tools developed by FDOT and the Highway Capacity Manual, the nationally recognized methodology for performing roadway LOS analysis. The City, County and FDOT have recently spent in excess of \$18 million dollars to coordinate all traffic signals in Alachua County and to establish a centralized system to control the signals. This significant improvement has the opportunity to increase capacity along major arterial roadways and improve traffic flow. Should the County restrict itself to the Generalized Tables to evaluate SIS facilities, the County would receive no benefit from the expenditure of over \$18 million dollars; since the Generalized Tables utilize average green times and signal lengths in the LOS calculations and cannot be modified to real world conditions where capacity on the Strategic Intermodal System (SIS) Roadways could be significantly higher due to the coordinate traffic signals and increased green times. Further, should FDOT District 2 modify its stated policy regarding the use of the Generalized Tables and allow for alternative methodologies, the County would be required to amend its Comprehensive Plan to utilize the alternative methodologies which are utilized throughout the State of Florida. The County has agreed to amend the policies cited above and add "in consultation with FDOT" to the standard of measure language for SIS Roadways.

	Level of Service (LOS)	Standard of Measure
Pedestrian	B	Based on Presence of a pedestrian facility
Bicycle	B	Based on Presence of a bike lanes / paved shoulders
Express Transit	B	Based on Peak Hour Frequency of 15 minutes or less
Motor Vehicle*	D	Professionally Accepted Traffic Analysis
Motor Vehicle* - SIS**	C	Professionally Accepted Traffic Analysis, <u>in consultation with FDOT</u>

URBAN CLUSTER TRANSPORTATION MOBILITY AREAS						
	Northwest		Southwest		East	
Existing						
	N/S	E/W	N/S	E/W	N/S	E/W
Existing AADT	124,800	84,200	39,400	123,350	23,800	37,700
Existing MSV	163,800	143,700	75,400	187,900	64,900	94,100
Existing V/C Ratio	0.76	0.59	0.52	0.66	0.37	0.40
Miles of Road	11.7	16.0	13.0	18.4	8.0	16.1
2015						
	N/S	E/W	N/S	E/W	N/S	E/W
AADT	133,802	90,274	42,242	137,216	26,818	42,127
EXISTING MSV	163,800	143,700	75,400	187,900	64,900	94,100
V/C RATIO - NO ADDITIONAL CAPACITY	0.82	0.63	0.56	0.73	0.41	0.45
Miles of Road	11.7	16.0	13.0	18.4	8.0	16.1
Additional MSV	14,600	34,600	0	0	0	0
Cumulative MSV	178,400	178,300	75,400	187,900	64,900	94,100
V/C Ratio - WITH ADDITIONAL CAPACITY	0.75	0.51	0.56	0.73	0.41	0.45
Cumulative Miles of Road	12.3	18.5	13.0	18.7	8.0	16.1
Dedicated Transit Lane Miles	0.5	0	0	0	0	0
Multi-Use Path Miles	1	1	2	4	0	0
2020						
	N/S	E/W	N/S	E/W	N/S	E/W
AADT	140,628	94,879	44,397	148,172	29,223	45,635
EXISTING MSV	163,800	143,700	75,400	187,900	64,900	94,100
V/C RATIO - NO ADDITIONAL CAPACITY	0.86	0.66	0.59	0.79	0.45	0.48
Miles of Road	11.7	16.0	13.0	18.4	8.0	16.1
Additional MSV	16,400	55,000	16,400	35,700	1,500	0
Cumulative MSV	194,800	233,300	91,800	223,600	66,400	94,100
V/C Ratio - WITH ADDITIONAL CAPACITY	0.72	0.41	0.48	0.66	0.44	0.48
Total Miles of Road	13.2	20.6	14.05	19.2	8.0	16.1
Dedicated Transit Lane Miles	1.4	1.3	0.75	0.30	0.00	0.0
Cumulative Multi-Use Path Miles	1	3	7	9	1.1	1
2025						
	N/S	E/W	N/S	E/W	N/S	E/W
AADT	147,801	99,718	46,662	160,098	31,857	49,464
EXISTING MSV	163,800	143,700	75,400	187,900	64,900	94,100
V/C RATIO - NO ADDITIONAL CAPACITY	0.90	0.69	0.62	0.85	0.49	0.53
Miles of Road	11.7	16.0	13.0	18.4	8.0	16.1
Additional MSV	14,600	0	6,300	38,600	0	0
Cumulative MSV	209,400	233,300	98,100	262,200	66,400	94,100
V/C Ratio - WITH ADDITIONAL CAPACITY	0.71	0.43	0.48	0.61	0.48	0.53
Cumulative Miles of Road	14.2	23.0	14.1	21.2	8.0	16.1
Cumulative Dedicated Transit Lane Miles	2	5.9	0.75	3.6	0.0	1.1
Cumulative Multi-Use Path Miles	5	3	10.7	13.6	4.3	1
2030						
	N/S	E/W	N/S	E/W	N/S	E/W
AADT	155,341	104,805	49,042	173,088	34,746	53,644
EXISTING MSV	163,800	143,700	75,400	187,900	64,900	94,100
V/C RATIO - NO ADDITIONAL CAPACITY	0.95	0.73	0.65	0.92	0.54	0.57
Miles of Road	11.7	16.0	13.0	18.4	8.0	16.1
Additional MSV	16,400	16,400	14,600	29,200	0	19,300
Cumulative MSV	225,800	249,700	112,700	291,400	66,400	113,400
V/C Ratio - WITH ADDITIONAL CAPACITY	0.69	0.42	0.44	0.59	0.52	0.47
Cumulative Miles of Road	16.5	28.1	15.95	24.10	8.0	17.7
Cumulative Dedicated Transit Lane Miles	5.3	5.9	3.5	3.6	1.5	1.1
Cumulative Multi-Use Path Miles	7	5	13.1	14.6	4.3	3.9
Note: AADT increased by 1% per year on County Roads and 2% per year on State Roadways						
Note: Strategic Intermodal System (SIS) Roadways are not included in Areawide LOS Analysis						
Note: New/Widened/Reconstructed Roadways in CIE will include multi-use paths & bike lanes						
Note: Number of roads in Urban Cluster already have sidewalks and bike lanes on both sides of road, thus meeting proposed bike and pedestrian LOS standards in CPA 01-09						

ROADWAY	FROM	TO	District	LOS Standard	# of Lanes	Length of Segment	Existing AADT	Daily Capacity
STRATEGIC INTERMODAL SYSTEM (SIS) ROADS IN URBAN CLUSTER								
Newberry Road (SR 26)	I-75	NW 122nd St (Parker Rd)	NW	C	4	3.0	28,500	34,700
SW 8th Avenue	I-75 / SW 20th Ave	NW 122nd St (Parker Rd)	NW	D	2	4.0	5,800	16,400
Newberry Corridor	I-75	NW 122nd St (Parker Rd)	NW			3.0	34,300	51,100
SW 8th Avenue is identified in the CIE as a parallel roadway to Newberry Road with construction completed by 2015. The parallel roadway provides ample corridor capacity until 2030. The CIE also identifies NW 23rd Avenue to the north of Newberry Road as a parallel facility serving the a similar travel demand pattern.								
Newberry Road (SR 26)	NW 122nd St	NW 143rd St (CR 241)	NW	C	4	1.5	24,000	34,700
SW 8th Avenue	NW 122nd St	NW 143rd St (CR 241)	NW	D	2	1.5	2,100	16,400
Newberry Corridor	NW 122nd St	NW 143rd St (CR 241)	NW			1.5	26,100	51,100
The future year analysis does not indicate that there are any projected capacity deficiencies on the above portion of Newberry Road.								

ROADWAY	FROM	TO	PROJECTED AADT (1% Annual Growth County Roads/ 2% Annual Growth State Roads)				OVER CAPACITY				ROAD OR TRANSIT CAPACITY PROJECT PLANNED (INCLUDING PARALLEL FACILITY)			
			2015	2020	2025	2030	2015	2020	2025	2030	2015	2020	2025	2030
Newberry Road (SR 26)	I-75	NW 122nd St (Parker Rd)	32,738	36,145	39,907	44,060	--	YES	YES	YES	--	SW 8th, Parallel	SW 8th, Parallel	BRT Lane
SW 8th Avenue	I-75 / SW 20th Ave	NW 122nd St (Parker Rd)	6,218	6,536	6,869	7,219	--	--	--	--	--	--	--	--
Newberry Corridor	I-75	NW 122nd St (Parker Rd)	38,956	42,680	46,776	51,280	--	--	--	YES	--	--	--	NW 23rd
Newberry Road (SR 26)	NW 122nd St	NW 143rd St (CR 241)	27,568	30,438	33,606	37,104	--	--	--	--	YES	--	--	BRT Lane & SW 8th
SW 8th Avenue	NW 122nd St	NW 143rd St (CR 241)	2,251	2,366	2,487	2,614	--	--	--	--	--	--	--	--
Newberry Corridor	NW 122nd St	NW 143rd St (CR 241)	29,820	32,804	36,093	39,717	--	--	--	--	--	--	--	--