



Florida Department of Transportation

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October 8, 2010

Mr. Ray Eubanks
Plan Review and Processing Administrator
Department of Community Affairs (DCA)
Division of Community Planning
2555 Shumard Oaks Blvd.
Tallahassee, FL 32399

RE: Collier County Proposed Evaluation and Appraisal Report (EAR) – FDOT Recommendations and Comments

Dear Mr. Eubanks:

The Florida Department of Transportation (FDOT), District 1, has reviewed the Collier County Proposed Evaluation and Appraisal Report (EAR), transmitted to the Department of Community Affairs (DCA) on September 10, 2010 in accordance with the requirements of Florida Statutes (F.S.) Section 163 and Chapter 9J-11 of the Florida Administrative Code (F.A.C.). The department offers DCA the following comments and recommendations for your consideration in review of the EAR.

CAPITAL IMPROVEMENTS ELEMENT (CIE)

EAR recommended changes to this element include the following:

- Renaming of certain element references, including Sub-Element, Goal, and Objectives and Policies throughout;
- **Policy 1.4**revision to introduce reducing Vehicle Miles Traveled (VMT) and Green House Gas (GHG) emissions as criterion for further prioritizing projects;
- **Policy 1.5**revisions related to multi-Element revisions in a comprehensive effort to manage redundancy;
- **Policy 2.10**considered for revision to allow for more-responsive fiscal management;
- **Objective 3**minor revision timeframe reference;
- **Policy 3.1**minor revisions associated with new terminology;
- **Policy 4.1**minor revisions to provide updated Statutory cite;
- **Policy 4.2**revision to provide updated reference site;
- **Policy 4.6**minor revisions associated with new terminology;
- **Policy 5.1**minor revisions associated with new terminology (*may need minor revisions to provide updated Statutory cite*).

The department has the following comments on these recommended changes:

FDOT Comment # 1: For clarification, Policy 1.5 (A) (1) (*included in page 5*) of the CIE should be revised to specifically indicate that the peak hour Level of Service (LOS) standard of "E" does not apply to roadways on the Florida Intrastate Highway System (FIHS), Strategic Intermodal System (SIS), Emerging Strategic

Intermodal System (ESIS), and non-state roadway facilities funded by the Transportation Regional Incentive Program (TRIP).

FDOT Comment # 2: Please revise Policy 1.5 (A) (2) (*included in page 5*) of the CIE to indicate that the peak hour LOS standard of “D” does not apply to state arterials and collectors on the FIHS, SIS, ESIS, and TRIP funded roadways.

FDOT Comment # 3: Consistent with Comments # 1 and # 2, please revise Policy 1.5 (B) (*included in page 5*) of the CIE to indicate that FDOT sets and maintains the LOS for all FIHS, SIS, ESIS, and TRIP funded roadways including I-75 (SIS), S.R. 29 (ESIS) and S.R. 82 (SIS).

FDOT Comment # 4: The department recommends that Policy 1.5 (B) of the CIE be expanded to include language indicating that the LOS standard on the ESIS facilities S.R. 29 (*I-75 to the Hendry County Line*) and S.R. 82 (*Hendry County Line to S.R. 29*) should be LOS “C” consistent with the standards set forth by the FDOT. Also, the LOS standards on I-75 from the Broward County Line to S.R. 951 should be LOS “B” and from S.R. 951 to Lee County should be LOS “D” corresponding to rural and urbanized area, respectively.

TRANSPORTATION ELEMENT (TE)

EAR recommended changes to this element include the following:

- **Policy 3.4**modifications to provide more flexibility in policy;
- **Policy 3.5**revision to eliminate time frame for achieving policy;
- **Policy 4.9**addition of new policy to address HB697;
- **Policy 5.1**revision to provide clarification and applicability of policy;
- **Policy 5.3**modifications to provide expanded applicability of policy;
- **Policy 5.5**modifications to provide for monitoring;
- **Policy 5.6**modifications to provide for monitoring;
- **Policy 5.8**modifications to improve effectiveness of policy;
- **Policy 5.9**deletion based upon action accomplished;
- **Policy 6.2**revision to terminology within policy;
- **Policy 6.3**revision to provide clarity to policy;
- **Policy 6.5**revisions to update list of projects identified;
- **Policy 7.3**modifications to expand applicability of policy;
- **Policy 7.4**modification to recognize the requirement to implement HB697;
- **Policy 7.5**revision to recognize on-going efforts of the policy;
- **Policy 9.3**revision to provide clarity of policy;
- **Policy 12.8**deletion based upon transit systems exempt from concurrency.

The Department has the following comments on these recommended changes:

FDOT Comment # 5: Please revise Policy 1.3 in the Transportation Element to be consistent with Policy 1.5 in the CIE. Please see FDOT Comments # 1 and # 2.

FDOT Comment # 6: Please revise Policy 1.4 in the Transportation Element to be consistent with Policy 1.5 (B) of the CIE. Please see FDOT Comment # 3.

FDOT Comment # 7: The department recommends that Policy 1.4 of the Transportation Element be expanded to include language indicating that the LOS standard on the ESIS facilities S.R. 29 (*I-75 to the Hendry County Line*) and S.R. 82 (*Hendry County Line to S.R. 29*) should be LOS “C” consistent with the

standards set forth by the FDOT. Also, the LOS standards on I-75 from Broward County Line to S.R. 951 should be LOS “B” and from S.R. 951 to Lee County should be LOS “D” corresponding to rural and urbanized area, respectively.

FDOT Comment # 8: Consistent with the Collier County Planning Commission (CCPC) comment from the August 25, 2010 EAR Workshop, the department recommends that a time frame be determined to accomplish Policy 3.5 of the Transportation Element.

FDOT Comment # 9: The department notes that the EAR identifies the need to modify Policy 5.1 of the Transportation Element to clarify the following terms and concepts: “*Significantly impacted road segment and deficient as it related to the County adopted 2%-2½-3%*”, “*mitigation and how it should be applied*”, and “*what happens when mitigation allows a project to be consistent with this policy*”.

FDOT Comment # 10: The department recommends that the terms and concepts clarified in Policy 5.1 be consistent with the Florida Administrative Code and Florida Statutes, and that appropriate references be cited accordingly.

FDOT Comment # 11: The department notes that the modification to provide for monitoring relating to Policy 5.5 is mistakenly placed within Policy 5.6 and should be brought under Policy 5.5.

FDOT Comment # 12: The department notes that the modification to provide for monitoring relating to Policy 5.6 is not found in the document and should be included.

INTERGOVERNMENTAL COORDINATION ELEMENT (ICE)

EAR recommended changes to this element include the following:

- **Objective 1** minor revisions to include certain key agencies;
- **Policy 1.2**revision to reflect the Department name change;
- **Policy 1.3**revision to reflect the Department name change;
- **Policy 2.1**inclusion of the word “*appropriate*” so that agreements are not limited to agencies within Collier County;
- **Policy 2.6**minor text revisions to update dates;
- **Policy 2.7**minor text revisions to update dates and requirements;
- **Policy 2.8**revision to correct SFWMD name;
- **Policy 2.9**minor text revisions to include a comma and delete specific Florida Statute sub-section.

These revisions do not impact state roadways and, therefore, the department offers no comments.

FUTURE LAND USE ELEMENT (FLUE)

EAR recommended changes to this element include the following:

- **Policy 1.4** revise to allow for, but not mandate, the creation of a District (*perhaps replace “shall” with “may”*);
- **Policy 2.1**revise to correct the CIE Policy reference;
- **Policy 2.4**if changes are made to the Density Rating System to delete the Traffic Congestion Area density reduction factor as proposed, then revise this policy to delete that reference;
- **Policy 2.5**revise to reflect the existence of the TCMA’s (*perhaps replace “shall designate” on first line with “has designated”*);
- **Policy 4.5**revise to recognize the periodic update (*perhaps replace the last sentence with a commitment to periodically update the inventory*);

- **Policy 4.7**revise to specify that a redevelopment plan may only be prepared by the County or its agent unless first approved by the Board, and to add reference to the Immokalee Redevelopment Plan;
- **Policy 5.3**revise to clarify changes to the Urban designation refers to the new designation of lands as Urban (*perhaps replace “changes” in the third line with “addition”*);
- **Policy 5.14** revise as necessary to reflect the changed status and contents of the Inter-local Agreements as well as any changes necessary to correlate with the Public School Facilities Element;
- **Objective 6** revise to reference the establishment of TCMA's in past tense (*perhaps replace “are hereby” in the last sentence with “have been”*);
- **Policy 6.3**revise paragraph e) to begin with a verb so as to follow the sentence structure (*perhaps add “Providing” before “Vehicular”*);
- **Objective 7**revise to reference reduction of greenhouse gas emissions (*perhaps add “reduce greenhouse gas emissions,” on the second line after “policies.”*);
- **Policy 7.3**revise for proper wording (*perhaps replace “and their interconnection points” with “and/or provide interconnections(s)”*);
- **Policy 7.7**revise to update the Division name;
- **Office and In-fill Commercial Subdistrict** revise criterion “1” regarding its applicability;
- **Density Rating System – Residential In-fill**revise to eliminate Transfer of Density Rights (TDR) requirement;
- **Density Rating System – Traffic Congestion Area**..... delete and replace with a Coastal High Hazard Area (CHHA) density reduction factor, reflect this on the FLUM, make correlating changes to all Growth Management Plan (GMP) references to this provision, make correlating changes to the FLUM to modify the four partial residential density bands within the Urban Residential Subdistrict to complete circular brands, revise both the Roadway Access and Proximity to Mixed Use Activity Center or Interchange Activity Center (*residential density bands*) bonuses to replace reference to this provision with CHHA reference, and revise the Conversion of Commercial Bonus to prohibit its applications within the CHHA;
- **Mixed Use Activity Center Subdistrict** revise to reduce allowable density for residential-only projects within the CHHA to a maximum of 4 DU A and revise the Master Planned Activity Center provision for clarity and possible substantive change;
- **Rural Fringe Mixed Use District** revise to clarify that the District only applies to A-zoned lands, to correct a miss-numbering in the RFMUD Sending Lands designation, and revise the Exemption provision to clarify the applicability of “*expansion*” and to delete unneeded text from the Exemption title;
- **Bayshore/Gateway Triangle Redevelopment Overlay**.....revise to delete subparagraph 8.e.;
- **Future Land Use Map and Map Series** revise the CHHA boundary to correlate with any CHHA boundary description change made in CCME Policy 12.2.5. revise to update and correct as necessary underlying details of some FLUM series maps, revise one or more maps to correlate with past map changes on related maps, revise Stewardship Overlay Map to add additional approved Stewardship Sending Area and to correct the boundaries of SSA #7, revise FLUM to correct the depiction of certain boundaries in the eastern portions of the County, and revise FLUM legend to depict the (*non-Activity Center*) interchange feature;
- **Henderson Creek Mixed Use Subdistrict**.....revise to delete paragraph “p”;
- **Davis Boulevard/County Barn Road Use Subdistrict**..... revise to correct a date reference;
- **Planning Horizon Issue**..... revise the various planning horizons in the GMP to be consistent;
- **Designation/District/Subdistrict Relationship** revisions throughout to clarify the relationship between Designations, Districts, and Sub-districts.

The Department has the following comments on these recommended changes:

FDOT Comment # 13: (Density Rating System – Residential In-fill) It is not clear how much additional development could occur should the elimination of the TDR requirement to qualify for the Residential Infill bonus density occur. Should substantial additional development occur from this amendment, the department recommends that an area wide traffic study be conducted and supporting documentation be provided to establish that adequate capacity will be available for new trips that will impact state facilities for the long-term horizon year and short-term year 2015 conditions.

FDOT Comment # 14: (Density Rating System – Traffic Congestion Area) Please provide analyses to establish the impact of deleting the Traffic Congestion Area Density reduction factor and replacing it with the Coastal High Hazard Area reduction factor. Should substantial additional development occur from this amendment, the department recommends that an Area Wide Traffic Study be conducted and supporting documentation provided to establish that adequate capacity will be available for new trips that will impact state facilities for the long-term horizon year and short-term year 2015 conditions.

GOLDEN GATE AREA MASTER PLAN (GGAMP)

EAR recommended changes to the GGAMP Element include the following:

- **Goal 1**reformatting; re-state to capture essence of subsequent Objectives and Policies;
- **Objective 1.1**reformatting;
- **Policy 1.1.5**may be deleted;
- **Policy 1.1.6**may be deleted or relocated;
- **Policy 1.2.2**revisions to identify another specific activity able to benefit from alternative financing, and re-emphasize balanced transportation planning efforts;
- **Policy 1.2.4**reformatting;
- **Objective 1.3**reformatting;
- **Policy 1.3.1**minor revisions to provide new departmental references;
- **Objective 1.4**reformatting;
- **Policy 1.4.1**consider expanding to ensure comprehensive and uniform application of LDC;
- **Objective 2.1**reformatting;
- **Policy 2.1.1**delete (*no longer applicable*);
- **Policy 2.1.2**minor revision to update terminology;
- **Policy 2.1.3**delete (*no longer applicable*);
- **Policy 2.1.4**delete (*no longer applicable*);
- **Objective 2.2**revisions to show remaining efforts following major project completion, and reformatting;
- **Policy 2.2.1**delete (*no longer applicable*);
- **Policy 2.2.2**delete (*no longer applicable*);
- **Objective 3.1**consider modification to strengthen this Objective and its subsequent Policy in demonstrating support for reducing VMT and GHG emissions, and reformatting;
- **Objective 4.1**reformatting;
- **Policy 4.1.1**revisions to delete mandate to complete a date-specific task;
- **Policy 4.1.2**revisions to delete mandate to complete a date-specific task;
- **Policy 4.1.3**revisions to delete mandate to complete a date-specific task;

- **Objective 5.1** consider minor revision to show use of existing resource, revisions to delete mandate to complete a date-specific task, re-state to capture essence of subsequent Policy, consider modification to strengthen this Objective and its subsequent Policy in demonstrating support for reducing VMT and GHG emissions, and reformatting;
- **Policy 5.1.1** consider minor revision to show use of existing resource, revisions to better support its Objective, and reformatting;
- **Objective 5.2** minor revision to be more inclusive of jurisdictions under the Plan, and reformatting;
- **Policy 5.2.1** minor revision for clarity, consider modifications to strengthen this Policy in demonstrating support for reducing VMT and GHG emissions, and reformatting;
- **Policy 5.2.2** revisions to delete mandate to complete a date-specific task, consider minor revision to show use of existing MPO resource and consider modification to strengthen this Policy in demonstrating support for reducing VMT and GHG emissions;
- **Policy 5.2.3** minor revision to show remaining efforts following major project completion;
- **Objective 5.3** consider minor revision to show use of existing resource, and reformatting;
- **Policy 5.3.2** minor revision to strengthen preservation efforts;
- **Goal 6** consider modification to strengthen this Goal, and its subsequent Objectives and Policies, in demonstrating support for reducing VMT and GHG emissions;
- **Objective 6.1** consider modification to strengthen this Objective and its subsequent Policies in demonstrating support for reducing VMT and GHG emissions and revisions to illustrate expanded planning efforts for more mobility options, and reformatting;
- **Policy 6.1.1** minor revision to illustrate expanded planning efforts, and reformatting;
- **Policy 6.1.2** minor revision to reflect continuing efforts between agencies;
- **Objective 6.2** consider modification to strengthen this Objective and its subsequent Policies in demonstrating support for reducing VMT and GHG emissions, and reformatting;
- **Objective 6.3** reformatting;
- **Policy 6.3.1** minor revision to delete mandate to complete a date-specific task;
- **Policy 6.3.2** minor revision to delete mandate to complete a date-specific task;
- **Objective 7.1** reformatting;
- **Policy 7.1.3** revision to delete mandate to complete a date-specific task;
- **Objective 7.2** reformatting;
- **Policy 7.2.1** minor revision;
- **Policy 7.2.2** minor revision to eliminate duplication of activities;
- **Objective 7.3** re-state to capture essence of subsequent Policies; consider modification to strengthen this Objective and its subsequent Policies in demonstrating support for reducing VMT and GHG emissions, and reformatting;
- **Policy 7.3.1** minor revision to illustrate expanded planning efforts;
- **Policy 7.3.4** minor revision to delete mandate to complete a date-specific task;
- **GGAMP Objective** new recommendation based on 2009 adoptions of HB 697 and the County Energy Audit & GHG Inventory;
- **GGAMP Policy** new recommendation to follow County Energy Audit & GHG Inventory;
- **GGAMP** assessment of Select Provisions;

- **Estates – Mixed Use District (Conditional Uses Subdistrict)**.... revision to encompass all essential service uses relevant to the Golden Gate Estates area and expand the referenced listed zoning districts to encompass all relevant zoning districts in Golden Gate Estates;
- **Estates – Commercial District (Randall Boulevard Commercial Subdistrict)**.....revision to replace the term “shopping center” with reference to C-2 uses.

These revisions do not impact state roadways and, therefore, the department offers no comments.

IMMOKALEE AREA MASTER PLAN ELEMENT (IAMP)

EAR recommended changes to IAMP Element include the following:

- The IAMP Element of the GMP is currently in the process of revising and replacing each existing Goal, Objective and Policy of the IAMP, as well as revising and replacing all future land use designations on the IAMP and IAMP FLUM. The IAMP is expected to be adopted in the first quarter of 2011. The proposed plan intends to increase density and intensity as the main mechanism to promote economic development within the Immokalee Urban Area

The department has the following comments on these recommended changes:

FDOT Comment # 15: The changes to the IAMP Element have the potential to create an increase in vehicle trips on state roadway facilities. The department recommends that an Area Wide Traffic Study be conducted and supporting documentation provided for the above referenced amendments to establish that adequate capacity will be available for new trips that may impact state roadways for the long-term horizon year and short-term year 2015 conditions. Funding sources should be identified for improvements required to alleviate all short-term failures. The improvements needed to achieve and maintain the adopted LOS standard through the year 2015 (*short term*) should be included in a Five-Year Schedule of Capital Improvements. For long-term failures, appropriate policies should be identified in the CIE or Transportation Element of the Comprehensive Plan and the needed improvements should be added to the appropriate plans and programs.

Additional Comment:

FDOT Comment # 16: Analyses and data should be provided for all state roadway facilities for the current year (2010) and the long-term horizon year (2030) to ensure that all ESIS, SIS, FIHS, and non-state roadways with improvements funded through the TRIP adhere to the adopted FDOT LOS standards and to the roadway capacities found in the FDOT 2009 Generalized LOS Tables. If alternative capacities are used for any ESIS, SIS, FIHS, or TRIP facilities, please provide supporting documentation for review showing the derivation of the alternative capacity. Please provide policies/plans to remedy any failures projected for state roadways in the horizon year.

If you have any questions, or should clarification or additional information be needed, please contact me at (239) 461-4300 or lawrence.massey@dot.state.fl.us.

Sincerely,



Lawrence Massey
District 1 Growth Management Coordinator

LLM/llm/gmb