



Florida Department of Transportation

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July 14, 2017

Mr. Ray Eubanks
Plan Processing Administrator
Department of Economic Opportunity
Caldwell Building
107 East Madison Street, MSC 160
Tallahassee, FL 32399

**RE: Lee County 17-4DRI Proposed Comprehensive Plan Amendment (Babcock)
State Coordinated Review – Traffic Study Memorandum**

Dear Mr. Eubanks:

The purpose of this memorandum is to inform the Department of Economic Opportunity (DEO) of the noted deficiencies / inconsistencies in the Traffic Study dated December 5, 2016 (Exhibit IV. B.1, Traffic Circulation Analysis), included as part of the Lee County 17-4DRI Proposed CPA (Babcock) data, input and analysis. These deficiencies / inconsistencies include the following:

1. There are inconsistent development program references throughout the CPA package. Please clarify the proposed development program throughout the amendment package.
2. Lee County MPO amended their Long Range Transportation Plan Cost Feasible Plan in January 2017 to include widening of SR 31 from SR 80 to SR 78 as a Private/Grant Funded Project. This improvement is not included in the sub-area validated FDOT/MPO District 1 Regional Planning Model (D1RPM_V1.02_Babcock) used in the CPA Long Range 20-Year Horizon (2040) traffic analysis. Please update the D1RPM_V1.02_Babcock to include four lanes along SR 31 from SR 80 to SR 78.
3. Please remove discussions related to Special Generators and Baseball Complex since the Baseball Complex is no longer applicable¹. Please remove Traffic Analysis Zone (TAZ) #3113 and the socio-economic data associated with the previously proposed Baseball Complex. Also, please update the socio-economic data to reflect the reduction of hotel rooms from 1,500 to 600¹.

¹ During the SR 31 PD&E Project Traffic teleconference call on May 26, 2017, the applicant stated that the revised development program (emailed to FDOT on May 26, 2017) no longer includes the 42 amateur sports fields, and that the hotel rooms would be reduced from 1,500 to 600 rooms.

4. Please rerun the D1RPM_V1.02_Babcock with the recommended revisions identified above, and revise the Long Range 20-Year Horizon (2040) traffic analysis accordingly.
5. The analysis included in the traffic study is inconsistent with the currently proposed amendment to Map 4 (Private Recreational Facilities Overlay) because it includes the previously proposed 42 amateur sports fields, which have since been removed from the overlay². Please clarify this inconsistency and revise the analysis as appropriate.
6. The following is in reference to the calculations used in determining the number of residential units and the square feet of non-residential land use.
 - a. Please clarify the number of residential DUs being proposed, and provide a breakdown showing how the 1,662 residential DUs were calculated.

The proposed 1,662 DUs appear to be based on the entire 4,157± acre site, calculated at one DU per 2.5 acres. Per the CPA Application (pdf page 44), the site consists of 3,427.8 acres of uplands, 729.4 acres of wetlands and surface water (671.8 acres of wetlands and 57.6 acres of total surface waters). Based on these acreages, the Department calculates the total number of residential units as follows:

 - The 3,427.8 acres of uplands at one DU per 2.5 acres yields 1,371 DUs, and the 729.4 acres of wetlands at one DU per 20 acres (FLU Element Policy 1.5.1) yields 36 DUs, resulting in a total of approximately 1,407 DUs; which is less than the 1,662 DUs described in the Project Summary.
 - b. Please provide a breakdown showing how the 1,170,000 square feet of commercial uses were calculated based on the 0.15 FAR (see pdf pages 4 and 44 of the CPA package).
7. Policy 114.1.1 references Footnotes 9b and 9c of Table 1(a), Summary of Residential Densities. Please verify the Footnote references as Table 1(a) on pdf pages 32 and 33, does not include Footnotes 9b and 9c.
8. The following deficiencies pertain to the revised Traffic Study – Future Conditions Without CPA and Future Conditions With CPA – Exhibits 2-1 and 2-2 (*Lee County*).
 - a. Please revise the service volume along SR 31 from SR 80 to Bayshore Road from 970 to 924. The service volume of 880 (corresponding to acceptable LOS standard D for a Class I 2-lane arterial located in an Urbanized Area) should be adjusted by 5% only once for the presence of exclusive right turn lanes.

² During the SR 31 PD&E Project Traffic teleconference call on May 26, 2017, the applicant stated that the revised development program (emailed to FDOT on May 26, 2017) no longer includes the 42 amateur sports fields, and that the hotel rooms would be reduced from 1,500 to 600 rooms.

- b. Please revise the service volume along SR 31 from Bayshore Road to Old Rodeo Drive from 2,205 to 2,100. The service volume of 2,000 (corresponding to acceptable LOS standard D for a Class I 4-lane arterial located in an Urbanized Area) should be adjusted by 5% only once for the presence of exclusive right turn lanes.
9. The following deficiencies pertain to the revised Traffic Study – Future Conditions Without CPA and Future Conditions With CPA – Exhibits 2-1 and 2-2 (*Charlotte County*).
 - a. Please revise the service volume along SR 31 from Cook Brown Road to DeSoto County Line from 670 to 850 consistent with the Revised Methodology dated November 21, 2016, since it is an uninterrupted highway in a rural developed area.
10. The following deficiencies pertain to the revised Traffic Study – Future Transportation Needs Without CPA.
 - a. Please revise the number of lanes along SR 80 from SR 31 to Buckingham Road from 6 lanes to 4 lanes under the column “Lee Country MPO 2040 LRTP Cost Feasible Network # of Lanes”.
 - b. Please revise the number of lanes along SR 31 from SR 80 to SR 78 from 2 lanes to 4 lanes under the column “Lee Country MPO 2040 LRTP Cost Feasible Network # of Lanes”.
 - c. Based on the analysis provided in Exhibit 2-2, please revise the “CPA Analysis Needed # of Lanes” from 8 to 6 for SR 31 from Lee County Line to Cook Brown Road. Accordingly, please revise the number of lanes under “Changes to Adopted MPO Needs Plan” from “Add 4 lanes” to “Add 2 lanes”.
 - d. Based on the analysis provided in Exhibit 2-2, please revise the “CPA Analysis Needed # of Lanes” from 4 lanes to 6 lanes for I-75 from Charlotte County Line to Tuckers Grade.
11. The following deficiencies pertain to the revised Traffic Study – Future Transportation Needs With CPA:
 - a. FDOT does not support separating right turn volumes from through volumes in determining the number of lanes required for the roadway segment. Therefore, please revise the “CPA Analysis Needed # of Lanes” from 6 lanes to 8 lanes for SR 31 from North River Road to Babcock Lee Entrance similar to “Without Project Scenario”.
 - b. Per the analysis provided in Exhibit 3-2, please revise the “CPA Analysis Needed # of Lanes” from 6 lanes to 4 lanes for SR 31 from Lee County Line to Cook Brown Road.

FDOT District One looks forward to working expeditiously with Lee County and the applicant to address the above listed deficiencies in data, input and analysis and ensure any impacts to the SHS and SIS facilities of state importance are adequately mitigated prior to the submittal of the final amendment package. Please contact Lawrence Massey at (239) 225-1980 or Sarah Catala at (239) 225-1981 (at your earliest convenience) so that we can set up a meeting to review and address these deficiencies.

Sincerely,

Laura Herrscher
District Intermodal Systems Development
Administrator

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