



## Florida Department of Transportation

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July 21, 2017

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### RE: Lee County 17-5ESR Proposed Comprehensive Plan Amendment (Expedited State Review Process) – FDOT Technical Assistance Comments

Dear Mr. Dunn:

The Florida Department of Transportation (FDOT), District One, has reviewed the Lee County 17-5ESR Proposed Comprehensive Plan Amendment (CPA). The CPA proposal package was transmitted under the Expedited State Review process by the Lee County Board of County Commissioners in accordance with the requirements of Florida Statutes Chapter 163. FDOT offers the following technical assistance comments.

The Lee County 17-5ESR Proposed CPA includes two independent CPAs locally known as CPA 2015-00010 (Apaloosa Lane) and CPA 2017-00001 (Growth Management). Following is a summary of both amendments.

#### **CPA 2015-00010 (APALOOSA LANE)**

CPA 2015-00010 is a County-Initiated Text and Map Amendment to the Lee Plan, including:

1. Amending the Lee Plan Future Land Use Map (FLUM) to designate 59.72+/- acres from the Outlying Suburban (OUT-SUB) FLUM category to the General Interchange (GEN-INT) FLUM category, on property generally located along the north side of Daniels Parkway on both sides of Palomino Lane, extending to Apaloosa Lane.
2. Amending Table 1(b), Year 2030 Allocations, to accommodate additional residential development in the GEN-INT FLU category within the Daniels Parkway Planning Community.



The currently adopted OUT-SUB FLU designation allows up to three dwelling units (DUs) per acre, resulting in 179 single-family residential DUs. The 179 DUs generates approximately 1,794 daily trips or 177 p.m. peak hour trips. The proposed GEN-INT allows up to 22 DUs per acre, resulting in 1,313 multi-family residential DUs. The 1,313 DUs would generate approximately 8,080 daily trips or 740 p.m. peak hour trips; resulting in a net increase of 6,286 daily trips or 563 p.m. peak hour trips.

The following table summarizes the trip generation potential for the adopted and proposed land uses, as well as the change in trips as a result of the amendment.

### TRIP GENERATION COMPARISON

Scenario	Land Use Designation	Maximum Allowed Density / Intensity	Land Use Code	Size of Development		Daily Trips <sup>1</sup>	PM Peak Hour Trips <sup>1</sup>
				Acres	Allowed Development		
Adopted	RES-SF	3 DUs/Acre	210	59.72	179 DUs	1,794	177
Proposed	RES-MF	22 DUs/Acre	220	59.72	1,313 DUs	8,080	740
<b>Change in Trips</b>						<b>+6,286</b>	<b>+563</b>

1. Trip generation based on the rates and equations obtained in the ITE Trip Generation Manual (9th Edition)

As seen in the following tables, a planning level analysis was prepared to establish whether State roadways in the vicinity of the project will operate at their adopted level of service (LOS) standards during the existing (2016), short-term (2022), and long-term (2040) horizon year conditions.

### YEAR 2016 EXISTING ROADWAY CONDITIONS

Roadway	From	To	SIS/E-SIS?	LOS Std. <sup>1</sup>	2016 Daily Conditions				
					No. of Lanes	Service Volume	Volume <sup>2</sup>	LOS	Acceptable?
Daniels Pkwy/SR 876	W. of I-75	E. of Rest Area	No	D	6	62,895	53,000	C	Yes
I-75	Alico Rd	Terminal Access Rd	Yes	D	6	151,800 <sup>3</sup>	98,964	B	Yes
I-75	Terminal Access Rd	Daniels Pkwy	Yes	D	6	131,800 <sup>3</sup>	98,964	C	Yes
I-75	Daniels Pkwy	SR 884/CR 884/Colonial Blvd	Yes	D	6	111,800	90,000	C	Yes

1. Adopted LOS Standard obtained from Lee County.
2. 2016 Volumes obtained from 2016 FDOT District One LOS Spreadsheet.
3. Includes Auxiliary Lanes.

### YEAR 2022 SHORT-TERM HORIZON ROADWAY CONDITIONS

Roadway	From	To	2022 Daily Conditions (E+C)								
			No. of Lanes <sup>1</sup>	LOS Std. <sup>2</sup>	Service Volume	Back-ground Volume <sup>3</sup>	Project Distribution <sup>4</sup>	Project Trips	Total Volume	LOS	Acceptable?
Daniels Pkwy/SR 876	W. of I-75	E. of Rest Area	6	D	62,895	59,889	45.0%	2,829	62,718	D	Yes
I-75	Alico Rd	Terminal Access Rd	6	D	151,800 <sup>5</sup>	110,126	20.0%	1,257	111,383	C	Yes
I-75	Terminal Access Rd	Daniels Pkwy	6	D	131,800 <sup>5</sup>	110,126	20.0%	1,257	111,383	C	Yes
I-75	Daniels Pkwy	SR 884/CR 884/Colonial Blvd	6	D	111,800	96,471	20.0%	1,257	97,728	D	Yes

1. Number of Lanes (based on E+C Condition) obtained from 2016 FDOT District One LOS Spreadsheet.
2. Adopted LOS Standard obtained from Lee County.
3. The short-term planning horizon year 2022 background volume was obtained based on interpolation between 2016 and 2040 volumes.
4. Project Trip Distribution was obtained from the traffic study provided by the Applicant.
5. Includes Auxiliary Lanes.

### YEAR 2040 LONG-TERM HORIZON ROADWAY CONDITIONS

Roadway	From	To	2040 Daily Conditions								
			No. of Lanes <sup>1</sup>	LOS Std. <sup>2</sup>	Service Volume	Back-ground Volume <sup>3</sup>	Project Trip Distribution <sup>4</sup>	Project Trips	Total Volume	LOS	Acceptable?
Daniels Pkwy/SR 876	W. of I-75	E. of Rest Area	6	D	62,895	80,557	45.0%	2,829	83,386	F	No
I-75	Alico Rd	Terminal Access Rd	6	D	151,800 <sup>5</sup>	143,613	20.0%	1,257	144,870	D	Yes
I-75	Terminal Access Rd	Daniels Pkwy	6	D	131,800 <sup>5</sup>	143,613	20.0%	1,257	144,870	F	No
I-75	Daniels Pkwy	SR 884/CR 884/Colonial Blvd	6	D	111,800	115,884	20.0%	1,257	117,141	E	No

1. Number of Lanes from 2040 District One Regional Planning Cost Feasible Model.
2. Adopted LOS Standard obtained from Lee County.
3. The long-term planning horizon year 2040 background volume was obtained based on an average of 2040 model volumes and 2040 historical trend volumes.
4. Project Trip Distribution was obtained from the traffic study provided by the Applicant.
5. Includes Auxiliary Lanes.

Based on the planning level analysis, the segments of Daniels Parkway/SR 876 from West of I-75 to East of Rest Area, and I-75 from Terminal Access Road to SR 884/CR 884/Colonial Boulevard, are expected to operate below acceptable levels of service (LOS) during the long-term (2040), without the proposed CPA.

FDOT notes that Daniels Parkway from I-75 to Metro Parkway (which includes a portion of the State segment) is designated as a constrained roadway (Lee Plan Table 2(a)). Pursuant to Lee Plan Policy 95.1.3(7) and Policy 37.2.2, a maximum volume-to-capacity (v/c) ratio of 1.85 is established for the constrained roads identified in Table 2(a) that lie in the unincorporated area. Based on the planning level analysis, Daniels Parkway from west of I-75 to Fiddlesticks Boulevard/Palomino Lane is estimated to have a V/C of 1.28 without the proposed CPA, and a V/C of 1.33 with the proposed CPA. Moreover, the project trips along the above mentioned segment account for approximately 4.50% of the roadway capacity, and are considered insignificant.

FDOT also notes that the segment of I-75 from Collier County Line to Luckett Road has been identified as a needed widening project from six lanes to eight lanes in the Lee County MPO 2040 Long Range Transportation Plan (LRTP). In addition, the project trips along the I-75 segments from Terminal Access Road to SR 884/CR 884/Colonial Boulevard, range from 0.95% to 1.12% of the roadway capacity in year 2040, and are considered insignificant.

**FDOT Technical Assistance Comment #1:**

*As noted earlier, the approximately 1,257 daily trips being added to I-75 account for approximately 0.95% to 1.12% of the adopted LOS Standard service volume, which does not adversely impact I-75. Although the new trips do not create an adverse impact on I-75, the trips associated with CPA 2015-00010 (Apaloosa Lane) are considered to be local in nature. These local trips contribute to, and further exacerbate the long-term failure of I-75 by competing with long distance and regional trips. The Department encourages the development of a multimodal strategy which will facilitate alternative local transportation networks that connect residential and non-residential uses without affecting larger systems.*

**FDOT Technical Assistance Comment #2:**

*The new development associated with the CPA 2015-00010 (Apaloosa Lane) is expected to serve residential development. In an effort to reduce personal automobile trips on State and SIS transportation facilities, minimizing potential transportation impacts, State roadways are planned, designed and constructed in harmony with the surrounding land use characteristics. This context sensitive approach promotes healthy, safe, and economically viable communities that encourages quality of life, incorporating all modes of transportation. FDOT offers several initiatives to assist the County in creating quality developments while protecting future mobility on the regional roadway network. These include "Complete Streets"<sup>1</sup>, modern roundabouts<sup>2</sup>, and a commitment to bicycle and pedestrian safety<sup>3</sup>. FDOT welcomes the opportunity to partner with, and provide technical assistance to Lee County, to create multimodal transportation facilities to serve all users.*

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<sup>1</sup> <http://www.flcompletestreets.com/>

<sup>2</sup> <http://www.dot.state.fl.us/rddesign/Roundabouts/Default.shtm>

<sup>3</sup> <http://www.alerttodayflorida.com/>

**FDOT Technical Assistance Comment #3:**

*FDOT offers no comments on the Text Amendment associated with CPA 2015-00010 (Apalooosa and Palomino Lane), which amend Table 1(b), Year 2030 Allocations, to accommodate additional residential development in the General Interchange future land use category within the Daniels Parkway Planning Community.*

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**CPA 2017-00001 (GROWTH MANAGEMENT):**

CPA 2017-00001 (Growth Management) is a County-initiated Text Amendment that proposes to amend the Lee Plan to align land use and transportation policies. The amendments that deal with land use clarify existing requirements; reorganize the goals, objectives, and policies to group topics such as development standards, growth management, and mixed use; and provide for alternative development regulations that allow for urban forms of development within the Mixed-Use Overlay. The amendments that address transportation reduce redundancies, align with state statutes, recognize a multi-modal transportation network; and allow for different roadway cross sections based on location (requires amendment to Land Development Code).

*The proposed text amendments associated with CPA 2017-00001 (Growth Management) do not change allowable densities and intensities within the Lee Plan, and allows for the implementation of mixed-used, compact developments that follow context-sensitive design principles that encourage bicycle/pedestrian and transit use. As a result, FDOT offers no comments on CPA 2017-00001.*

Thank you for providing FDOT with the opportunity to review and comment on the proposed amendments. If you have any questions or need to discuss these comments further, please contact me at (239) 225-1981 or [sarah.catala@dot.state.fl.us](mailto:sarah.catala@dot.state.fl.us).

Sincerely,



Sarah Catala  
SIS/Growth Management Coordinator  
FDOT District One

CC: Mr. Ray Eubanks, Florida Department of Economic Opportunity