

APPENDIX A
FDOT REVIEW COMMENTS





Florida Department of Transportation

RICK SCOTT
GOVERNOR

10041 Daniels Parkway
Fort Myers, FL 33913

MIKE DEW
SECRETARY

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

CC: LK Nandam, P.E., Florida Department of Transportation
Steve Walls, Florida Department of Transportation
Lawrence Massey, Florida Department of Transportation
Sarah Catala, Florida Department of Transportation
Richard Shine, Esq., Florida Department of Transportation
Carmen Monroy, Florida Department of Transportation
Dana Reiding, Florida Department of Transportation
Andy Getch, P.E., Lee County Department of Community Development
David Loveland, AICP, Lee County Department of Community Development
Margaret Wuerstle, Southwest Florida Regional Planning Council
Ray Eubanks, Florida Department of Economic Opportunity
Brenda Winningham, Florida Department of Economic Opportunity
Gary Nelson, Babcock Property Holdings, LLC



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Mr. Ray Eubanks
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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 – FDOT Review Comments and Recommendations**

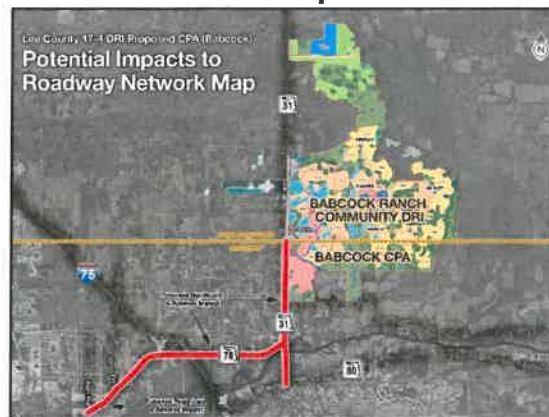
Dear Mr. Eubanks:

The Florida Department of Transportation (FDOT), District One has reviewed the Lee County 17-4 DRI proposed Comprehensive Plan Amendment (CPA), locally named CPA 2016-00013 (Babcock), pursuant to the state coordinated review (SCR) process set forth in section 163.3184 (4), Florida Statutes (F.S.). The following is a summary of the current Lee County 17-4 DRI proposed CPA along with the Department's comments and recommendations related to important state transportation resources and facilities.

CPA OVERVIEW

The CPA proposes to amend the Lee County Comprehensive Plan Future Land Use (FLU) Map and FLU Element to allow a low density, mixed-use development on 4,157± acres of land located directly south of the Lee/Charlotte County Line and east of SR 31, in Lee County, FL. (*reference Figure 1*).

Figure 1: Location and Impacted Roadway Map



FLU Map Amendments

- Amend the FLU Map (Map 1) to change the FLU category of the property from Density Reduction/Groundwater Resource (DR/GR) and Wetlands to New Community and Wetlands
- Amend the Private Recreational Facilities Overlay (Map 4) to remove the subject property from the overlay

FLU ELEMENT TEXT AMENDMENTS

Amend Objectives 1.6, 35.3, 35.4 and 35.11 (new Objective and Policies 35.11.1, 35.11.2 and 35.11.3), Policies 1.6.1 and 35.3.4 (new Policy), Goal 35, Policy 114.1.1, and Tables 1(a) and 1(b) to allow a maximum density of 1 dwelling unit per 2.5 acres (1,662 dwelling units), nonresidential uses at a 0.15 floor area ratio (FAR) (1,170,000 square feet) and provide requirements for clustered development, environmental enhancements and permanent conservation.

The following summarizes the major highlights of the proposed text amendments:

- Objective 1.6 and Policy 1.6.1 provide a maximum density of 1 DU per 2.5 acres of uplands for property outside the Gateway/Airport Planning Community, establish a minimum size requirement of 2,000 acres for property to be designated New Community and provide a cross reference to development parameters for property designated New Community within the North Olga Community Planning area
- Goal 35, Objectives 35.3 and 35.4 and new Policy 35.3.4 reference the uses allowed under new Objective 35.11
- New Objective 35.11 establishes the New Community FLU category within the North Olga Community as follows:
 - New Policy 35.11.1 specifies the maximum density of one DU per 2.5 acres
 - New Policy 35.11.2 specifies the maximum permitted FAR of 0.15 for nonresidential uses
 - New Policy 35.11.3 specifies the conditions of a Planned Development Rezoning regarding Environmental Enhancements, Water Quality and Hydrological Enhancements, Infrastructure Enhancements and Community Character
- Policy 114.1.1 allows owners of wetlands adjacent to the New Community FLU category to transfer densities to developable contiguous uplands per Footnotes 9b and 9c of Table 1(a), Summary of Residential Densities
- Table 1(a), Summary of Residential Densities, limits residential densities on the New Community FLU category within the North Olga Community to one DU per 2.5 acres
- Table 1(b), Year 2030 Allocations, revises the allocations of development permitted within each FLU category to reflect the Babcock development in Lee County

FDOT COMMENTS

FDOT is responsible for preserving and maintaining the functional operation of the State Highway System (SHS) and the focus the review is related to major transportation issues that would create an adverse impact to transportation facilities of state importance and identification of measures to eliminate, reduce, or mitigate such adverse impacts in accordance with sections 163.3161(3) and 163.3184(4), F.S. Important SHS facilities include the Strategic Intermodal System (SIS) and certain significant regional resources and corridors as identified in the Lee County Metropolitan Planning Organization (MPO) 2040 Long Range Transportation Plan (LRTP).

Based on our review FDOT has three main comments regarding the proposed amendments; 5-year planning horizon, data input and analysis and transportation methodology - intersections. Measures recommended by the Department to eliminate, reduce, or mitigate the impact of the proposed amendment are also provided. Agency comments, if not addressed, may result in a challenge to an adopted amendment.

FDOT Comment #1 – Planning Horizon:

Pursuant to 163.3177(5)(a), F.S., any comprehensive plan amendment traffic analysis is required to cover at least two planning periods; short-term (5-Year Capital Improvements Element) and long-term planning horizons to determine the effect of the land use change. The statute also states that additional planning periods for land use amendments shall be permissible and accepted as part of the planning process.

FDOT finds the transmitted CPA package is not consistent with section 163.3177(5)(a), F.S. because the submitted amendment only includes analysis of one planning period (the long-term (2040) conditions). Since the required short-term 5-year planning period traffic analysis is not included, the effect of the proposed development on nearby SHS facilities, including SR 31, SR 78, SR 80, and I-75 cannot be fully evaluated. This creates concern the proposed development may adversely impact important state resources within the short-term planning horizon as well as at build-out (2026).

Resolution:

FDOT recommends that the short-term (5-year) traffic analysis required pursuant to 163.3177(5)(a) be provided with the CPA package and build-out (2026) analysis in order to identify impacts of the proposed development to the SHS. Significant and adverse impacts should include appropriate mitigation measures along with a proportionate share calculation for each solution.

FDOT Comment #2 – Data, Input and Analysis:

FDOT finds the transmitted CPA package is not consistent with sections 163.3177(3)(a)3 and 163.3177(6)(a)8, F.S. The traffic study supporting this application does not adequately reflect future land uses and programmed future improvements. As an

example, the revised development program (emailed to FDOT on May 26, 2017) no longer includes 42 amateur sports fields and shows that hotel rooms will be reduced from 1,500 to 600 rooms. In addition, the widening of SR 31 from SR 80 to SR 78 included in the Lee County MPO's Long Range Transportation Plan Cost Feasible Plan was not factored into the study.

In October, 2016 Lee County requested a courtesy review of the draft CPA and original CPA traffic study (dated September 27, 2016) from FDOT. As part of this review several inconsistencies between this CPA package, the original report and the revised CPA application, including the accompanying staff report and traffic study, were identified. These inconsistencies are summarized in the following Table 1:

Table 1: Development Program Comparison

Category	Development Program (10/14/2016)	Revised Development Program		
		Application (4/27/2017)	Staff Report (6/7/2017)	Traffic Analysis (12/5/2016)
Residential Dwelling Units (DUs)	1,680	1,630	1,662	1,630
Non-Residential Square Feet (SF)	1,220,000	1,170,000	1,170,000	1,170,000
Hotel Rooms	1,500	1,500	N/A ³	1,500
Amateur Sports Fields	42	42	0	42
Acres	4,204.7	4,157.2	4,157.2	4,200
Land Use	Includes an Overlay ¹ modifying the densities and intensities allowed under the DR/GR ² FLU Category	Change from DR/ GR ² and Wetlands FLU to New Community and Wetlands	Change from DR/ GR ² and Wetlands FLU to New Community and Wetlands	Includes an Overlay ¹ modifying the densities and intensities allowed under the DR/GR ² FLU Category
FAR for Nonresidential	0.25	0.25	0.15	N/A ³

- 1) Environmental Enhancement & Economic Development Overlay specific to the North Olga Community.
- 2) DR/GR = Density Reduction/Groundwater (DR/GR).
- 3) Not Available – Not specified in the revised application

Resolution:

FDOT prepared a traffic study memorandum (enclosed) which details the noted deficiencies in data inputs and analysis. FDOT staff is available to discuss these technical issues with the applicant so that we can adequately determine the extent of the proposed development program's short and long term impacts and ensure that the future land use map is based on an accurate analysis of the availability of facilities and services, pursuant to 163.3177(3)(a)3, and 163.3177(6)(a)8, F.S.

FDOT Comment #3 – Intersection Methodology:

FDOT provided comments and recommendations on September 29, 2016 for the transportation methodology to be utilized in analysis of the proposed development and its effect on the SHS roadway network. One of the recommendations was to include intersection analysis in the CPA transportation analysis. On October 28, 2016, FDOT again recommended intersection analysis be included as part of the CPA transportation analysis a part of the courtesy review and technical assistance provided to Lee County. To date, intersection traffic analyses for the CPA have not been provided by the applicant.

Resolution:

To ensure safe and efficient access to the SHS, FDOT recommends intersection analysis be included for the short-term (2021) and build-out (2026) horizons as part of the study. Significant and adverse impacts should include appropriate mitigation measures along with a proportionate share calculation for each solution.

- a. Include all project entrances along SR 31 (both for BRC DRI and Babcock CPA) in the intersection analysis along with a map showing all project entrances along SR 31
- b. Intersection turning movement counts (TMCs) utilized for this study should be no more than one-year old
- c. All signalized and major un-signalized intersections (including SR 31 @ SR 80 in Lee County and SR 31 @ CR 74 in Charlotte County) on significant roadways should be included in the intersection analysis
- d. Utilize a minimum 2% heavy vehicle percentage for analysis of future traffic conditions even if existing traffic count data shows heavy vehicle percentages of less than 2%
- e. Provide a clear and precise explanation of the methodology to be used in identifying adversities and proposed remedy mitigation along signalized and un-signalized study intersections in the CPA Transportation Methodology. This methodology should include the following:
 - Intersections that are anticipated to operate overall at, or below, the adopted LOS performance standard
 - Intersection movements and approaches that are anticipated to operate at a v/c ratio > 1.0 or LOS E or worse
- f. Include the I-75 @ SR 78/Bayshore Road interchange and conduct a queue analysis for all intersection movements operating at LOS E or F in both short-term (2021) and build out (2026) analyses to confirm that blockage does not occur and to identify any improvements needed to accommodate queued vehicles. Please

base all storage length calculations on FDOT Plans Preparation Manual (PPM) procedures

FDOT District One staff will continue to work with Lee County staff and the applicant to address our comments and ensure impacts to the SHS and SIS facilities of state importance are adequately mitigated prior to submittal of the final amendment package. Please contact Lawrence Massey at (239) 225-1980 or Sarah Catala at (239) 225-1981 with any questions or concerns.

Sincerely,



Laura Herrscher
Intermodal Systems Development Administrator

LH:sc

Enclosure

C: LK Nandam, P.E., Florida Department of Transportation
Steve Walls, Florida Department of Transportation
Lawrence Massey, Florida Department of Transportation
Sarah Catala, Florida Department of Transportation
Richard Shine, Esq., Florida Department of Transportation
Carmen Monroy, Florida Department of Transportation
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Ray Eubanks, Florida Department of Economic Opportunity
Brenda Winningham, Florida Department of Economic Opportunity
Gary Nelson, Babcock Property Holdings, LLC

Babcock Comprehensive Plan Amendment (17-4DRI) Meeting
1:00 PM August 16, 2017
FDOT - SWAO
Attendees: See attached sign-in sheet

Highlights

Laura Herrscher (FDOT) welcomed Babcock and Lee County to the meeting. The meeting was held to hear and discuss any questions from Babcock regarding the Department's comments on Lee County 17-4DRI. She turned the meeting over to Gary Nelson with Babcock.

1. Gary Nelson provided a brief history of the Babcock Ranch Community (BRC) Development of Regional Impact (DRI) and the Lee County property:
 - The BRC DRI in Charlotte County is processed as a Master DRI and the individual development increments are being processed in the form of Notice of Proposed Change (NOPC).
 - The initial Increment 1 Phase 1 identified necessary improvements to mainline SR 31 and intersections along SR 31. The recently adopted Increment 1 identified necessary improvements to intersections along SR 31.
 - The Lee County property is currently being processed as a separate development through the State Coordinated Review (SCR) Process. The development met the minimum thresholds of a DRI, but received a clearance letter from the Department of Economic Opportunity (DEO) confirming that the project may be processed as a SCR in lieu of being processed as a substantial deviation to the BRC DRI in Charlotte County.
2. Babcock has applied for a State Infrastructure Bank (SIB) loan for funding the widening of SR 31. Their intention is to widen SR 31 to 4 lanes from SR 78 to the project entrance. This will include improvements at intersections (both off site and on site) along SR 31. Babcock will continue to work with FDOT to address the development's impacts (both from BRC DRI and Lee County property) on state roadways.
3. The Lee County development process consists of a Comprehensive Plan Amendment (CPA) and a Rezoning. The CPA analyzed the long-term (2040) impacts of the development while the rezoning included the analysis for short-term (2021) and build-out (2026) to identify the impacts caused by the development. Lee County staff did not find the rezoning application submittal sufficient until after FDOT had issued its comment letter for the transmitted CPA (Lee County 17-4DRI). The short-term analysis was recently provided to FDOT for review. FDOT has not yet completed its review of the traffic analysis or the associated model files.
4. Babcock stated that the Lee County development is significant and adverse along SR 31 from SR 78 to Lee/Charlotte County Line as identified in the short-term (year 2021) transportation analysis. The segment of roadway is within the portion of the roadway

that Babcock intends to widen. The Lee County development is also significant and adverse along SR 78 from Hart Road to Slater Road and from I-75 to Palm Creek Drive as identified in the build-out year (2026) analysis. It is not clear how the impacts to SR 78 will be addressed or what funding will be used. There are no improvements identified in the 5-year work program from FDOT or Lee County or within the Lee County MPO Long Range Transportation Plan (Cost Feasible Plan or Needs Plan) for SR 78 from I-75 to Palm Creek Drive.

5. Lee County staff stated that transportation impacts from the Babcock development affect state roadways. The staff report for the rezone was not completed as of the meeting date (August 16th).
6. Gary Nelson proposed adding a condition into the rezone that states:

All development within the Planned Development will be required to mitigate the traffic impacts of the project, and provide its proportionate share of the needed roadway improvements in accordance with Objective 37.4 and Administrative Code 13-16, adopted August 21, 1991, as amended. The proportionate share amount can be offset, in accordance with AC 13-16, by the dedication of needed right-of-way or the construction of improvements that would measurably lessen the need for roadway improvements, or by payment of impact fees, or use of impact fee credits, or as otherwise set forth in a written agreement between Lee County, **FDOT** and the Developer.

7. Babcock also proposed coming up with a proportionate share agreement with FDOT and Lee County to pipeline improvements to SR 31. Babcock stated they are flexible in either creating a new developer agreement with FDOT or amending the existing agreement.
8. Babcock anticipates going to public hearing for both the CPA adoption and rezone on September 21st.
9. FDOT will complete its review of the short-term and build-out traffic analysis and provide comments to Lee County and Babcock. Additionally, the transportation comments listed in DEO's Objection, Recommendations, and Comments (ORC) report, which were meant to be technical and advisory in nature, will be addressed by the applicant.



Florida Department of Transportation
Babcock CPA Meeting
SWIFT SunGuide Center
2nd Floor Conference Room
(August 16, 2017 @ 1:00 p.m.)

NAME (please print)	EMAIL ADDRESS	COMPANY
SIGNATURE		
Sarah Catala	sarah.catala@dot.state.fl.us	FDOT
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Russell Schropp	russell.schropp@henlaw.com	
Teleconference:		
Richard Shine, CO Legal		
Jennifer Carver, CO Growth Mgt.		



Florida Department of Transportation

RICK SCOTT
GOVERNOR

10041 Daniels Parkway
Fort Myers, FL 33913

MIKE DEW
SECRETARY

September 15, 2017

Mr. Brandon Dunn, Principal Planner
Lee County Government
Department of Community Development Planning Section
PO Box 398
Fort Myers, FL 33902

RE: Babcock Mixed Use Planned Development Zoning Traffic Study Review

Dear Mr. Dunn:

The Florida Department of Transportation (FDOT) District One has reviewed the Babcock Mixed Use Planned Development (MPD) Zoning Traffic Study dated March 17, 2017, regarding Babcock's request to Lee County to amend the Comprehensive Plan. The District agreed to review the Zoning Traffic Study and model files submitted to Lee County for the MPD application to determine if this information would be sufficient in addressing comments outlined in the Department's letter attached to the Department of Economic Opportunity's (DEO) Objections, Recommendations and Comments Report dated August 15, 2017

Based on review of the information the following comments and recommendations with regards to the MPD Traffic Study are offered:

FDOT Technical Comment #1: Pages 20 through 23 and Exhibits 5a and 5b, Year 2021 Project Trip Generation

- a. The inbound and outbound trips for the Hotel Land Use (LUC 310) for the PM Peak Hour, shown in the table on page 18 and in Exhibit 5b as 215 and 205 are incorrect. Please revise the inbound and outbound trips for the Hotel Land Use (LUC 310) in the table (page 18) and Exhibit 5b for the PM Peak Hour to 205 and 215, respectively.
- b. Consistent with the BRC DRI Increment 1 NOPC and as specified in page 692 of Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, please

use the trip generation rate of 3.5 trips per acre to generate the PM Peak Hour trips for the 48 acres of Park (LUC 411).

Based on this comment, please revise the inbound and outbound trips for the Park Land Use (LUC 411) for the PM Peak Hour in the table (page 20) and Exhibit 5b to 96 and 72 instead of 5 and 4, respectively.

- c. Please provide the supporting internal capture worksheets used to derive the internal capture of 328 trips and Net New trips of 688 for the PM Peak Hour condition for the BRC DRI Increment 1 NOPC for Phase 1. Based on preliminary analysis, FDOT was only able to obtain an internal capture of 244 trips for the PM Peak Hour condition for the BRC DRI Increment 1 NOPC for Phase 1.
- d. Based on the above comments, please revise the table showing the Year 2021 Net New PM Peak hour trips on page 22. Also, based on the above comments, please revise Exhibits 4a, 4b, 5a, 5b, 6a, and 6b for Year 2021 Phase 1 conditions.

FDOT Technical Comment #2: Pages 31 through 33 and Exhibits 8a and 8b, Year 2026 Project Trip Generation

- a. The inbound and outbound trips for the Hotel Land Use (LUC 310) for the PM Peak Hour, shown in the table on page 31 and in Exhibit 8b as 537 and 513 are incorrect. Please revise the inbound and outbound trips for the Hotel Land Use (LUC 310) in the table (page 31) and Exhibit 8b for the PM Peak Hour to 515 and 535, respectively.
- b. Consistent with the BRC DRI Increment 1 NOPC and as specified in page 692 of Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, please use the trip generation rate of 3.5 trips per acre to generate the PM Peak Hour trips for the 48 acres of Park (LUC 411).
Based on this comment, please revise the inbound and outbound trips for the Park Land Use (LUC 411) for the PM Peak Hour in the table (page 31) and Exhibit 8b to 96 and 72 instead of 5 and 4, respectively.
- c. Based on the above comments, please revise the table showing the Year 2026 Net New PM Peak hour trips on page 33. Also, based on the above comments, please revise Exhibits 7a, 7b, 8a, 8b, 9a, and 9b for Year 2026 build out conditions.

FDOT Technical Comment #3: Page 26, Year 2021 Recommended Improvements - Roadways

FDOT agrees with the recommended roadway improvement which includes widening SR 31 to 4 lanes from the Lee/Charlotte County Line to SR 78 / Bay Shore Road, where the project is significant and adverse based on Babcock MPD/CPA project trips.

Please provide proportionate share calculations for the recommended roadway improvement (widening to 4 lanes).

FDOT Technical Comment #4: Pages 27 - 28, Year 2021 Recommended Improvements – Intersections

- a. FDOT notes that the short-term (2021) analysis includes intersection analyses for SR 31 at North River Road and the three project entrances along SR 31. To ensure safe and efficient access to the State Highway System (SHS), FDOT recommends that an additional intersection analysis be included in the short-term (2021) analysis for the signalized intersection of SR 31 at SR 78 (located along the identified significant and adverse segment of SR 31).

The intersection analysis should include appropriate mitigation measures including improvements to meet the following conditions:

- Overall and individual intersection movement LOS above the adopted LOS standard with no movements or approaches anticipated to operate at a v/c ratio > 1.0 or LOS E or worse.

Please provide proportionate share calculations for any necessary intersection improvements for SR 31 at North River Road (identified in page 27) and for the signalized intersection of SR 31 at SR 78 (to be analyzed based on the above comment).

FDOT notes that the applicant will be responsible for 100% of the cost of intersection improvements identified in pages 27 and 28 for the three site related intersections (project entrances).

FDOT Technical Comment #5: Page 37, Year 2026 Recommended Improvements – Roadways

FDOT agrees with roadway improvements identified for roadway segments where the project is significant and adverse based on Babcock MPD/CPA project trips including:

- SR 78 from Hart Road to Slater Road – Widen from 4 to 6 lanes
- SR 78 from I-75 to Palm Creek Drive – Widen from 2 to 4 lanes
- SR 31 from SR 78 / Bay Shore Road to Old Rodeo Drive – Widen from 2 to 4 lanes
- SR 31 from CR 78 / North River Road to Lee / Charlotte County Line – Widen from 2 to 4 lanes

FDOT notes that widening of SR 78 from I-75 to Palm Creek Drive from 2 lanes to 4 lanes is not identified in the Lee County MPO LRTP.

Please provide proportionate share calculations for the recommended roadway improvements.

FDOT Technical Comment #6: Pages 38 - 39, Year 2026 Recommended Improvements – Intersections

- a. FDOT notes that the Build out (2026) analysis includes intersection analyses for SR 31 at North River Road and the three project entrances along SR 31. To ensure safe and efficient access to the SHS, FDOT recommends that additional intersection analyses be included in the Build out (2026) analysis for the three signalized intersections (located along the identified significant and adverse segments of SR 31 and SR 78) listed below:

- SR 78 at I-75 NB Ramps
- SR 78 at I-75 SB Ramps
- SR 31 and SR 78

The intersection analyses should include appropriate mitigation measures including improvements to meet the following conditions:

- Overall and individual intersection movement LOS above the adopted LOS standard with no movements or approaches anticipated to operate at a v/c ratio > 1.0 or LOS E or worse.

Please provide the proportionate share calculations for the recommended intersection improvements for SR 31 at North River Road (identified in page 38) and for the signalized intersections of SR 78 at I-75 Ramps and SR 31 at SR 78 (to be analyzed based on the above comment).

FDOT notes that the applicant will be responsible for 100% of the cost of the intersection improvements identified in pages 38 and 39 for the three site related intersections (project entrances).

FDOT Technical Comment #7: Model Related Comments

FDOT reviewed the year 2021 analysis model files used in the study and found several discrepancies. For example, the 2021 Model ZONEDATA for the BRC DRI Increment 1 NOPC (TAZ 4070 in Charlotte County) shows 900 single family DUs and 600 multi-family DUs. This is inconsistent with the Development Parameters identified on page 5 of the Babcock Zoning Study, which shows 475 single family DUs and 200 multi-family DUs for 2021. Therefore, based on these discrepancies, the Department does not recognize the validity of the year 2021 model used in the study in its current version. However, the Department is willing to assist the applicant in correcting the discrepancies in the year 2021 model for any future use.

If you have any questions please contact Sarah Catala at (239) 225-1981 or sarah.catala@dot.state.fl.us.

Sincerely,



Laura Herrscher
Intermodal Systems Development
Administrator

- c: LK Nandam, P.E., Florida Department of Transportation
Steve Walls, Florida Department of Transportation
Lawrence Massey, Florida Department of Transportation
Don Conway, Esq., Florida Department of Transportation
Richard Shine, Esq., Florida Department of Transportation
Carmen Monroy, Florida Department of Transportation
Dana Reiding, Florida Department of Transportation
Jennifer Carver, Florida Department of Transportation
Sarah Catala, Florida Department of Transportation
Andy Getch, P.E., Lee County Department of Community Development
David Loveland, AICP, Lee County Department of Community Development
Margaret Wuerstle, Southwest Florida Regional Planning Council
Ray Eubanks, Florida Department of Economic Opportunity
James Stansbury, Florida Department of Economic Opportunity
Brenda Winningham, Florida Department of Economic Opportunity
Gary Nelson, Babcock Property Holdings, LLC
Alexis Crespo, Waldrop Engineering
Stephen Leung, David Plummer and Associates

Stephen Leung

From: Catala, Sarah [Sarah.Catala@dot.state.fl.us]
Sent: Monday, October 09, 2017 1:40 PM
To: Stephen Leung
Cc: Massey, Lawrence; Gary Nelson; jgraham@trafodata.net
Subject: Lee County 17-4DRI proposed Comprehensive Plan Amendment - FDOT Courtesy Review
Attachments: ZoneData_21b CHECK_TOD.XLSX

Stephen –

Based on FDOT's review of the subject re-interpolated 2021 ZONEDATA provided, we find that the previous interpolation errors appear to have been resolved with the exception of the 2021 data for TAZs 1209 and 1210 in Hendry County. These zones, which are associated with the planned Southwest Hendry and Rodina Sector Plans, were coded at full 2040 Build development levels for 2021.

The attached spreadsheet, which documents the Department's review, also shows interpolated 2021 data values for these zones.

Let me know if you have any questions or would like to discuss.

Thanks,

Sarah Catala, FDOT

District One Strategic Intermodal System (SIS) Coordinator
Growth Management Coordinator
Southwest Area Office
10041 Daniels Parkway
Fort Myers, FL 33913
Direct Line: 239.225.1981
Cell: 239.671.6247



From: Stephen Leung [<mailto:stephen.leung@dplummer.com>]
Sent: Thursday, October 05, 2017 9:56 AM
To: Catala, Sarah; Babuji Ambikapathy (BAmbikapathy@VHB.com); jgraham@trafodata.net
Cc: Gary Nelson
Subject: RE: Lee County 17-4DRI proposed Comprehensive Plan Amendment - FDOT Comments

Sarah,

To follow-up on our conversation yesterday, the revised D1RPM - Year 2021 (21b) Zdata file is attached for the Department's cursory review.

This 21b Zdata file was re-interpolated from the Base Year-10A and Future Year-40A files. The re-interpolation corrected the missing line entry for TAZs 1488, 1508 & 3337 in the original 40A file that resulted in a zonal misalignment with the 10A file.

Thanks.

Stephen Leung

Vice President - Transportation

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From: Catala, Sarah [<mailto:Sarah.Catala@dot.state.fl.us>]

Sent: Friday, July 14, 2017 5:11 PM

To: DCPexternalagencycomments; scott rogers; Winningham, Brenda; Dunn, Brandon; mwuerstle@swfrpc.org; Shine, Richard - General Counsel Office; Eubanks, Ray

Cc: Nandam, L. K.; Walls, Steve; Massey, Lawrence; Monroy, Carmen; Reiding, Dana; Getch, Andrew; Loveland, David; DANIEL TRESCOTT; Gary Nelson (gnelson@kitsonpartners.com); Stephen Leung; Herrscher, Laura; Stansbury, James

Subject: Lee County 17-4DRI proposed Comprehensive Plan Amendment - FDOT Comments

Good afternoon:

The Florida Department of Transportation (FDOT), District One has reviewed the Lee County 17-4 DRI proposed Comprehensive Plan Amendment pursuant to the state coordinated review process set forth in section 163.3184 (4), Florida Statutes. The attached letter and its enclosure (attachment) contain the Department's comments and recommendations related to important state transportation resources and facilities.

FDOT District One staff are available to discuss our comments at your convenience. Please contact Lawrence Massey at (239) 225-1980 or myself at (239) 225-1981 with any questions or concerns.

Have a nice weekend!

Sincerely,

Sarah

Sarah Catala

**District 1 SIS Coordinator
Growth Management Coordinator**

📞 P: 239.225.1981

✉ E: sarah.catala@dot.state.fl.us

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