



Florida Department of Transportation

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**ANANTH PRASAD, P.E.
SECRETARY**

June 19, 2012

Ms. Nicki van Vonno
Growth Management Director
Martin County
2401 S.E. Monterey Road
Stuart, Florida 34996

Dear Ms. van Vonno:

SUBJECT: Martin County 12-2ESR Proposed Comprehensive Plan Amendments – Extreme Sports

The Department has concerns regarding the proposed amendments to the future land use element and the future land use map (FLUM) needed to accommodate addition of a recreational use, Extreme Sports, to a site in the northwest quadrant of the I-95 interchange with SE Bridge Road (County Road 708). The proposed FLUM amendment would expand the area covered by the Expressway Oriented Transient Commercial Service Center (EOTCSC) future land use designation in the northwest quadrant of the interchange from 33.9 to 111 acres.

The focus of our review of the proposed amendments was on major transportation issues, particularly impacts to the Strategic Intermodal System (SIS), in accordance with section 163.3184(3)(b), *Florida Statutes*. I-95 is a SIS facility. SE Bridge Road is part of the Regional Roadway Network identified in the Strategic Regional Policy Plan for the Treasure Coast Transportation Council and the Regional Multimodal Transportation System designated by the Treasure Coast Transportation Council (TCTC). The TCTC includes the Martin Metropolitan Planning Organization (MPO).

Precedent for Modifying Uses Allowed under the EOTCSC Designation

As noted in the Martin County comprehensive plan, the EOTCSC future land use designation was established to recognize the immediate and unique needs of the public traveling through the County. It appears on the FLUM at the interchanges of I-95 with County Road 714 and State Road 76, as well as SE Bridge Road. Modifying allowable uses under the designation to accommodate the Extreme Sports site is not consistent with the designation's stated intent of serving pass-through trips rather than creating attractors that draw trips from the County and surrounding areas. Allowing modifications for one site would set a precedent for owners of other sites with an EOTCSC designation to request similar treatment, including owners of sites in the other three quadrants of the I-95/SE Bridge Road interchange.

Inadequate Assessment of Impacts

The traffic study submitted in the amendment package does not address impacts to I-95 or the I-95 interchange with SE Bridge Road. This interchange has a rural interchange configuration, which means it was not designed to accommodate high intensity uses and associated increased trips.

The staff report indicates an interchange analysis must be performed prior to final site plan approval for the Extreme Sports site pursuant to Martin County land development regulations. The Department recommends that this analysis occur earlier to provide adequate time to address safety and congestion issues and identify necessary mitigation. It is in the best interest of the County and the applicant to begin coordination with the Department's District Interchange Review Committee as early as possible. The state and federal approval processes for interchange modifications can take 12 months or more to complete. The configuration of the interchange also may impact access to the site. Development on the site will require an access permit from the Department.

In addition, the Department recommends that a traffic analysis accounting for all potential trips generated from the 111-acre site be completed. This analysis also should recognize the potential for new development in the surrounding area. As an example, the proposed Hobe Grove development of regional impact near the Extreme Sports site would add 4,300 dwelling units; 650,000 square feet of uses in a town center; and 3,900,000 square feet of mixed use, research, office and education uses. An analysis of overall impacts is needed to adequately assess congestion, access and needed improvements to transportation facilities and the I-95 interchange. The traffic study submitted in the amendment package is limited to the northern 77.1 acres of the site and assumes a net increase of 153 daily trips. That minor increase does not reflect the actual increase in trips the site could generate once developed.

I-95 by the Extreme Sports site is projected to operate at level of service (LOS) E in 2035, failing to meet the adopted standard of LOS C and indicative of congestion. Widening of I-95 through Martin County is identified as a need in the Martin MPO's 2035 Long Range Transportation Plan and the 2040 SIS Multi-Modal Unfunded Needs Plan. Widening of the facility is not funded for construction through either of those plans. Increasing the intensity of development adjacent to I-95 and an interchange, particularly with attraction uses, will add to congestion.

The traffic study submitted used the following assumptions to generate the net increase of 153 daily trips:

- 50 acre ski lake (park)
- 75 campground/recreational vehicle park sites
- 2 acre recreational facility
- 25,000 square feet of specialty retail.

These development limits are not included in the proposed text amendment to the EOTCSC future land use designation. There are no site-specific development limits in the comprehensive plan for the 33.9-acre portion of the site that already has an EOTCSC designation. The designation currently allows for convenience stores, gift shops, hotels/motels (maximum density of 20 units per gross acre), restaurants and gas stations. Development limits should be included in policy for the 111-acre site as a whole to

ensure the intensity of development allowed matches up with the availability of transportation infrastructure.

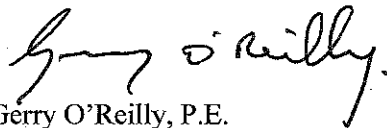
Another consideration is the amount of retail and other uses allowed on sites in the other three quadrants of the I-95/SE Bridge Road interchange with the EOTCSC designation. The lack of an adequate traffic analysis hinders the ability of the County to identify and address the transportation impacts of new development and reduce, eliminate or mitigate impacts to the SIS and regionally significant transportation facilities.

Plan for I-95/SE Bridge Road Interchange

The staff report notes Policy 4.7C.2. in the Martin County comprehensive plan which requires the County to complete an evaluation of potential urban uses in the vicinity of the I-95 interchanges with County Road 708 and County Road 714 in FY 2012/2013. Results of the evaluations are to be incorporated into the comprehensive plan by plan amendment. Implementation of this policy would be timely and provide an opportunity for the County to plan for the area holistically, addressing all four quadrants, I-95 and the surrounding area. Piecemeal planning as development applications are considered could lead to safety and congestion issues, thereby negatively impacting the interchange, the mainline of I-95 and other developments. Safety concerns with potential location of the access point for the Extreme Sports site less than the standard 660 feet from the I-95 access ramp also need to be addressed. This recommendation goes with the recommendation above regarding completion of a more comprehensive traffic analysis.

The Department appreciates the opportunity to review the proposed comprehensive plan amendments and looks forward to further consultation and coordination with Martin County staff. If you have any comments or questions about this letter, please contact Andrew Riddle at (954) 777-4605.

Sincerely,



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Director of Transportation Development
District Four

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