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State of Florida Division of Administrative Hearings: Petitioners' First Request for Admissions to University of North Florida and the St. Johns River Water Management District

Timothy Keyser

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STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

MICHAEL W. WOODWARD,

Petitioner,

v.

UNIVERSITY OF NORTH FLORIDA
and ST. JOHNS RIVER WATER
MANAGEMENT DISTRICT,

Respondents.

____________________

PETITIONERS' FIRST REQUEST FOR ADMISSIONS
TO UNIVERSITY OF NORTH FLORIDA AND
THE ST. JOHNS RIVER WATER MANAGEMENT DISTRICT

Petitioner requests that Respondents, UNIVERSITY OF NORTH
FLORIDA and the ST. JOHNS RIVER WATER MANAGEMENT DISTRICT, admit
the following pursuant to Fla.Civ.P. 1.370.

1. Each of the following documents attached to or mentioned
with this request is a true copy of the original and is genuine:

d. Psi Chi Resolution dated April 12, 1989.
i. Pre-Law Club Resolution dated March 2, 1989
j. United Faculty Resolution dated April 5, 1989.
k. Exceptional Children Resolution dated March 14, 1989.
m. Fencing Club Resolution dated March 20, 1989.

2. This road widening project is the first phase of a larger project known as the modified campus loop road.

3. The modified campus loop road is among other things, intended to connect with an eastern connection.

4. The eastern connection is designed to serve an off campus research and development park and an adjacent commercial area.

CERTIFICATE OF SERVICE

I CERTIFY that a copy hereof has been furnished to Marcia P. Parker, Attorney for University of North Florida, 1300 Building,
1300 Gulf Life Drive, Jacksonville, Florida 32207 and Clare E. Gray, Attorney for St. Johns River Water Management District, Post Office Box 1429, Palatka, Florida 32178-1429 by U. S. mail this 16th day of June, 1990.

TIMOTHY KEYSER, ATTORNEY
WHEREAS, the Student Body of UNF demonstrated strong opposition to the completion of the Loop Road, and;

WHEREAS, SGA passed SR 89S-471 opposing the Loop Road, and;

WHEREAS, the proposed Modified Loop Road fails to address the concerns outlined in SR 89S-471, and;

WHEREAS, the administration failed to meet its responsibility to seek more student consultation concerning the proposed Modified Loop Road.

THEREFORE, let it be resolved that SGA, as representatives of the Student Body, is opposed to the Modified Loop Road and respectfully submits this resolution as a formal protest to the UNF's administration's proposal to build the Modified Loop Road.

Respectfully Submitted,

Introduced by Student Advocate Board
Date June 28, 1989
Be it known that SR-89S-490 is hereby passed/

SENATE ACTION 17-0-1
Board or Committee
Dr. Adam Herbert, President  
University of North Florida  
4567 St. Johns Bluff Road  
Jacksonville, FL  32216

Dear Dr. Herbert,

The University of North Florida's Chapter of Phi Theta Kappa National Honor Fraternity has delayed expressing an opinion on the proposed loop because we wanted to ensure we had all the pertinent facts surrounding this controversy. We have conscientiously discussed this issue with our members and attended the public hearing on April 19, 1989. Phi Theta Kappa is known on campus for its concern for the best interests of the University and its students. This concern extends to those things which cannot speak - the wildlife and plantlife which share our land. It is our belief that humankind can no longer withdraw from its responsibility to stop the destruction of the environment. We share the belief of others that the University of North Florida should be known as a university which puts a concern for the environment ahead of monetary and developmental concerns. Therefore, after careful deliberation, we feel compelled to join our fellow students, faculty members, administrators, other University employees, and concerned citizens in voicing our opposition to the construction of the proposed loop.

Cordially,

Scott F. Echelberger  
President

Juanita Lepianka  
Vice President

Norma Stice  
Advisor
WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Sawmill Bough Conservation Club of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 2/28/89

_Title_

_President_

_Vice President_

_Faculty Advisor_
WHEREAS. The university wants to build both the loop road and the northern connector and;
WHEREAS. UNF recognizes there exists a traffic problem and;
WHEREAS. The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS. The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS. Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS. Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS. Only the northern connector could better provide traffic management, and;
WHEREAS. The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS. The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS. The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake-Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS. Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS. The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that Psi Chi of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 4/12/89

Signature

Title

President

Secretary

Treasurer

Vice President
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Nursing Student Council of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 4/9/89

Signature

Title

President, The Student Council

Faculty Advisor
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Wellness Club of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 3-22-89

Signature ____________________________

Title Wellness Club Pts.

______________________________

f.
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The College Republicans of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: March 21, 1989

Signature

Title

Chairman

Fund Raising Coordinator

Treasurer
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources;

BE IT THEREFORE RESOLVED, that Mr. Title of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 20 March 1989

Signature

President
First Vice President
Second Vice President
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Pre-Law Club of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: March 2, 1989

Title

Vice President
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector would better manage traffic circulation, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands, and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails, and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that the UNF Chapter of the United Faculty of Florida (UFF/UFT) of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: April 5, 1989

Title

President, UNF/UFF
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Council for Exceptional Children of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: March 14, 1989

Signature

Title
C.E.C. C.C.C. Representative
V. Pres. C.E.C.
Pres. C.E.C.
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Mathematics Statistics Club of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 3/16/89

Title

President

Vice President

Adviser
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF grows to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that The Fencing Club of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 3/29/99

Signature

Title

co-president

Faculty Sponsor
RESOLUTION

WHEREAS, The university wants to build both the loop road and the northern connector and;
WHEREAS, UNF recognizes there exists a traffic problem and;
WHEREAS, The loop road will have traffic run back into itself, so if and when UNF does grow to 10,000 students or more, a new and potentially more dangerous traffic problem will have to be addressed and;
WHEREAS, The completed loop road would be no safer than it is now since cars would still have to turn in and out of the parking lots, crossing traffic, as they do now, and;
WHEREAS, Only the northern connector will provide a second alternative entrance to the campus and;
WHEREAS, Only the northern connector entrance could cut roughly in half the current and future traffic using the present entrance, providing a safer and more efficient alternative entrance and exit and;
WHEREAS, Only the northern connector could better provide traffic management, and;
WHEREAS, The expensive loop road will have a negative impact on the environment and will run through environmentally sensitive wetlands and;
WHEREAS, The loop road will cross two major nature trails, which will have to be rerouted while the northern connector crosses no trails and;
WHEREAS, The loop road will necessitate the relocation of the nature trails parking lot to the far end of Lake Oneida, which means that if the Red Maple Boardwalk is to be maintained as a handicapped facility, another expensive boardwalk will have to be built connecting the two, and;
WHEREAS, Only the northern connector will not disturb any existing nature trails, boardwalks, or parking lots, and;
WHEREAS, The university is under pressure to cut its budget by 5% and by returning back to the state the money already allocated for the loop road, the university could avoid having to cut faculty, library books, staff, and other vitally needed educational resources,

BE IT THEREFORE RESOLVED, that Alpha Sigma VI of the University of North Florida supports the construction of the northern connector only and requests that the administration not complete the loop road.

DATE: 23 March 89

Title

Signatures

Faculty Advisor

(over)