

TPI Project—Fort Myers Beach—Parking and TIS Evaluations—April 8, 2018

(Ref TPI applicant documents: DPA Parking Calculations dated 2/12/2018, DPA TIS dated 3/8/2018 and MCP dated 11/15/2017—MCP submitted in January 2018 to FMB)

Key Parking Evaluation Points:

- Applicant double dips on credits, which significantly lowers their parking calculations. Area discrepancies between the TIS and MCP create different parking needs.
- Public parking is eliminated on site and their employee parking plan is to further tax offsite public available public parking as a way to reduce their required onsite parking. From a parking perspective, their project does not provide public benefits relative to the development request as proposed.
- Parking analysis seems to underestimate needs based on practical operations. Treating external retail space as ancillary (i.e. do not park); not parking any of the significant amenity space (banquet and conference area).

More Detailed Parking Evaluation Points:

- Differences between the Applicant's Master Concept Plan Areas and Areas Used in Traffic Impact Statement need to be resolved. Differences in specified restaurant, bar, and retail floor areas between the two documents results in a 20 parking space difference depending on which areas are used.
- Aquatics Venue Parking credits are over estimated/double counted. Applicant applies a walk up credit (55%) in the initial empirical calculation and then applies the LDC over all parking credit (33%) that accounts for the same issue. Appears to be a double dipping of credits, which will underestimate needed parking. Would recommend not applying the applicant's credit and use the LDC standard that is applied across the board of uses.
- Aquatics Venue—How will public entry be controlled? Venue is for 950 people and applicant assumption is that 225 people will be from public and 725 will be from hotel. Applicant applied credits (55% and 33%) indicate a public parking demand of 34 parking spaces, which appears to be low.
- Current site conditions indicate a public parking demand of 186 parking spaces is provided for the beach and surrounding commercial uses. The development proposes to eliminate 160 of the current public parking spaces on site. The proposed development would seem to increase public parking demand for the enhanced commercial, aquatics venue and beach uses proposed. The applicant proposes 366 parking spaces for the total project, which the direct hotel uses, requires 236 parking spaces per the applicant, and 130 parking spaces are provided for the other uses, which would accommodate a public demand. This results in a net reduction of 30 parking spaces over what is currently provided to public uses on the site.
- The accessory area of the hotel is 82,045 sf, which is a significant space. Part of this area is identified as banquet and meeting space. In the applicant's

parking calculations they show no additional parking demand for this significant area. It would seem reasonable that outside users may occupy this space (i.e. attending a banquet, wedding, or business function). Would recommend parking some of this area for anticipated outside public use. Suggest at least 10% at indoor recreation as an accommodation.

- Some “ancillary” uses are called out for retail and are not parked. These areas are positioned at the exterior street level and are readily available for public access. We would recommend parking such areas per LDC standards to achieve a reasonable parking supply for the anticipated demand.
- It is not clear if employees will be able to park on site and what specific accommodations have been made to assure an offsite parking plan is viable. Have offsite parking areas been secured and shuttle arrangements been made? They have indicated using existing public facilities, but is that a sufficient effort? They are eliminating 160 of the 186 public parking spaces on site and plan to tax further the public available parking offsite with their employee parking needs. A formal plan should be provided as a development requirement to include assurance that hotel employees can use alternative parking areas and not conflict other uses (i.e. parking not conflict with another required use). During the February LPA testimony, a hotel representative indicated that there would be 200 employees, so appropriate parking accommodations should be developed/required. They indicated that they would have a maximum of 50 employees on property, which does not mathematically compute assuming 3 shifts. A more reasonable assumption maybe a peak employee demand of 100 and if they all used the offsite park and ride lot, they alone would nearly fill the public parking lot.
- The valet parking plan with queuing analysis should be provided to evaluate impacts on the adjacent public streets.
- The applicant has indicated the project parking demand to be 360 parking spaces and they are providing 366 parking spaces. Staff estimates range from 371 parking spaces to over 601 parking spaces. The higher range estimate made is due primarily to the uncertainty of the applicant’s proposed operations (i.e. how to assure that 225 public vs. 725 hotel guest use of the aquatics venue). We would agree with staff concerns of better defining operations to assure the project’s success, so as to not create negative community parking impacts.
- An alternative parking analysis to include peak parking demand factors would be recommended to account for peak parking demand at differing times for the different uses. Such an analysis can be beneficial for a large mixed-use project such as this.

Key Traffic Impact Statement (TIS) Evaluation Points:

- Applicant takes credit for public parking lot on site as a trip generating land use to reduce the project’s net impact. Surrounding land uses (that are to

- remain) create the trip generation from the parking and not the physical parking lot.
- TIS illustrates a net new impact that is not reasonable given the increase in proposed development (i.e. a mere 15 vph PM Peak Hour increase for a more than fourfold increase in the number of hotel rooms on site). Other development aspects are increased as well. Credits developed in the TIS seem unreasonably high and create a distorted (low impact) conclusion.
 - As a result, minimal transportation mitigation is proposed for project operational impacts that are more significant than reported in the TIS.
 - Alternative intersection treatment evaluations should be required of the applicant, so that once the project has been constructed, such facilities can either be built contemporaneously, or not be precluded in the future due to constraints created by the project's construction.

More Detailed TIS Evaluation Points:

- A key issue of the TIS is the applicant taking credit for trip generation associated with the paid beach parking lot on site. A parking lot is not a trip generator in of itself, but the surrounding land uses are the cause of trip generation (i.e. beach, adjacent commercial uses). By taking credit for and using the parking lot trips as site traffic, it is our opinion and belief that the applicant is not measuring the true net impact of the proposed project. In the applicant's TIS, the 186 space parking area accounts for 99 of the sites existing 130 pm peak hour trips evaluated in the TIS (Exhibit 3 of DPA TIS). Over 76% of the existing site trips are attributable to the parking lot. The trips they are taking credit for will still occur by the surrounding land uses that cause them, but will now need to find another place to park. They should only be able to take credit for existing public parking spaces that they plan to replace in kind.
- TIS also uses a 55% reduction in trips generated due to assume arrival by means other than automobile. Such a significant reduction should be substantiated by Institute of Transportation Engineers (ITE) accepted practice standards, which the TIS did not provide. Reasonable judgement can be applied, but piling on high deductions and credits hampers the true evaluation of the project's traffic impacts.
- The existing turning movement counts used in the applicant's analysis are from September 2016 (dated and off season). Conversion factors are used, but we would recommend basing analysis on more current peak season count data, where not only volumes may change but behaviors affecting turning movements can be different. Relying on stale and offseason data for a project of this significance is not recommended.
- We would agree with staff TIS evaluation to consider implementation of a roundabout, or alternative intersection treatments at some of the key intersections the project is impacting (Estero Blvd/Crescent St and San Carlos Blvd/Estero Blvd/5th St). For instance the applicant has estimated

that 65% of their traffic will take a left at the intersection of Estero Blvd/Crescent St. A roundabout (mini, or standard) would significantly improve the operations of this intersection for these added turning movements. The timing for such improvements at the same time the resort is constructed would suit the project and community well. We would recommend requiring the applicant to complete a roundabout feasibility report for these two intersections as a stipulation for approval to include conceptual layouts. If roundabouts are deemed warranted, the applicant should pay a fair share towards the cost of these traffic control devices. They may also need to reserve ROW/easements for the roundabouts as a site impact that is needed. As proposed, the project may preclude future consideration of a roundabout due to physical constraints.

- As part of an operations TIS analysis, some of the significant “ancillary” uses, or hotel associated uses should be considered to more accurately evaluate traffic impacts that maybe caused off peak by hotel-associated functions. These would not impact concurrency issues, but are related to peak operations functions (valet service).
- As mentioned in the parking evaluation, the valet parking plan should be analyzed for queue impacts, particularly on Crescent St.
- Discrepancies between use areas specified in the TIS and MCP should be resolved, so the TIS analysis is more reflective of the project land use plan.