



June 7, 2018

Mr. Venkat Vattikuti, P.E., PTOE  
County Transportation Engineer, Public Works  
Charlotte County  
7000 Florida Street  
Punta Gorda, FL 33950

**RE: *Sunseeker Resort***  
***Parking Needs Analysis***  
***Charlotte County, Florida***

Dear Mr. Vattikuti:

Pursuant to our May 14, 2018 meeting with Charlotte County staff, the purpose of this letter is to request a parking needs analysis for the unique Sunseeker Resort in Charlotte Harbor. The Sunseeker Resort is unique from other hotels and resorts in that it holds partnership contracts with Allegiant Travel Company and Enterprise Rent-A-Car, both factors that will help reduce the resort's trip generation rate. Allegiant Travel Company holds a niche market within the airline industry which focuses on bringing leisure travelers from smaller cities to premier travel destinations. The Sunseeker Resort will be uniquely tailored to tourists from the Allegiant database, from which it expects to attract a significant portion of its guests.

With almost 1,500 rooms and units, the Sunseeker Resort is a large-scale development spread over 22 acres whose land use cannot be appropriately assessed solely using the County's current off-street parking requirements as stated in Section 3-9-79 of the Code of Ordinances. This analysis provides a comparison of the existing Code of Ordinances requirements and a parking variance analysis which considers a shared parking approach, the business model, and transportation resources provided by the Sunseeker Resort.

## **Introduction**

The proposed Sunseeker Resort plans to include the following development program:

- Hotel/Condo: 958 units (includes 319 lockout units)
- Hotel: 537 rooms
- Restaurant/Bars: 97,170 square feet
- Meeting and Convention Space: 53,860 square feet
- Retail: 3,881 square feet

- Swimming Pool: 118,141 square feet
- Spa/Fitness: 9,330 square feet
- Marina: 124 slips

This development breakdown will be applied in assessing the parking demand.

**Charlotte County Parking Requirement**

Below is an analysis of the parking requirements for the Sunseeker Resort per Charlotte County’s Code of Ordinances (Section 3-9-79). This does not include any adjustments for shared parking, mode split, or captivity. It considers the parking demand for each land use individually. Based on the calculations a total of 4,168 parking spaces are required.

**Hotel Condo- 1.5 spaces per unit**

Area Description	Total Units	Required Spaces
Building A	126	189
Building B	126	189
Building C	108	162
Building D	198	297
Building F	81	122
Lockout Units	319	479
<b>Total:</b>	<b>958</b>	<b>1,437</b>

**Hotel- 1 space per guest room plus 1 space per 3 employees**

Area Description	Rooms	Employees	Required Spaces
North Hotel-Guest Room Area	315	25	323
South Hotel-Guest Room Area	222	25	230
<b>Total:</b>	<b>537</b>		<b>554</b>

**Restaurant & Bars- Restaurant, Bars, Cocktail Lounges and Night Clubs 1 space per 100 SF**

Area Description	Gross Area (SF)*	Required Spaces
Fish Restaurant	9,209	92
Sports Bar	12,732	127
Maury's Coffee	3,396	34
Daiquiri Bar	918	9
Ice Cream	1,485	15
Mexican Restaurant	7,511	75
Sushi Restaurant	2,315	23
Chicken Restaurant	8,280	83
Main Pool Restaurant & Bar	3,740	37
Main Pool Bar	445	4
3 Meal Restaurant	8,273	83
Lobby Bar	3,834	38
Tiki Bar & Grill	4,333	43
Pool Bar	512	5
3 New South Hotel	13,820	138
Mediterranean	6,717	67
Seafood	3,530	35
Aspiration Bar	1,635	16
Steak House	4,485	45
<b>Total:</b>	<b>97,170</b>	<b>972</b>

\* Gross area was used, did not deduct non-conditioned air area. Excludes common/shared facilities.

**Meeting & Convention Services- Places of Assembly, 1 space per 3 seats plus 1 space per employee**

Area Description	Gross Area (SF)	Number of Seats*	Number of Employees	Required Spaces
North Hotel Ballroom	11,514	958	10	329
Meeting Room	9,799	408	10	146
North Hotel Prefunction	11,467	-	-	-
Meeting Space Support	12,522	-	-	-
South Hotel Ballroom	5,570	463	10	164
South Hotel Prefunction	2,988	-	-	-
<b>Total:</b>	<b>53,860</b>	<b>1,829</b>	<b>30</b>	<b>640</b>

\* The number of seats were calculated using the following website:  
<https://www.meetings.com/Meeting-Room-Capacity-Calculator>  
 The seats were calculated using the Banquet-6', meeting room as Classroom and  
 Prefucntion as Support for Banquet Space and Meeting Rooms.

**Retail- 1 space per 200 square feet of floor area**

Area Description	Gross Area (SF)	Required Spaces
North Hotel Pool Retail	729	4
Sales Office-South Village	3,152	16
<b>Total:</b>	<b>3,881</b>	<b>19</b>

**Swimming Pool- 1 space per 250 square feet of pool area**

Area Description	Gross Area (SF)	Required Spaces
Main Pool- Level 1	100,261	401
North Hotel Pool-Level 2	10,445	42
South Hotel Pool- Level 8	7,435	30
<b>Total:</b>	<b>118,141</b>	<b>473</b>

**Spa/Fitness- 1 space per 150 square feet of floor area**

Area Description	Gross Area (SF)	Required Spaces
Spa/Fitness- Level 5	9,330	62
<b>Total:</b>	<b>9,330</b>	<b>62</b>

**Marina- 1 space per 10 docking slips**

Area Description	Number of Slips	Required Spaces
Marina Village	104	10
South Village	20	2
<b>Total:</b>	<b>124</b>	<b>12</b>

<b>Total Parking Required:</b>	<b>4,168</b>
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### **Parking Demand Analysis**

The Sunseeker Resort is an unusually large resort development with almost 1,500 rooms/units and restaurants, retail, and amenities. The Resort will have a partnership with Allegiant Airlines in which the two companies will offer bundled airline and vacation deals. The Resort will also provide shuttles for guests who fly with Allegiant to and from the Punta Gorda Airport. This contract between the Sunseeker Resort and Allegiant Airlines will decrease the number of guests driving or renting a car to the resort. This expectation of a reduced parking demand is further increased due to another contract between the Sunseeker Resort and Enterprise Rent-A-Car. Enterprise will deliver daily car rentals to the resort for guests who wish to travel outside of the resort.

The County's Code of Ordinance does not have parking standards for a resort or hotel/condo units. Using the parking requirements stated in the County's Code is not an appropriate strategy for this type of resort project. The Code of Ordinance does allow a parking study to be conducted that provides proper justification for the required parking needs.

Since this is a unique project it was difficult to find comparable sites to benchmark parking needs against, instead a unique approach needed to be applied to project the parking needs. The main issues that will impact the parking demand, include:

- Percentage of people taking the shuttle from the airport,
- Percentage of people driving to the Resort from the region, and
- Percentage of people captured on the site patronizing the restaurants versus the region.

The management of the facility and parking will also have a substantial impact on parking demand. The following is a list of the planned facility and parking management strategies at Sunseeker, which will help reduce the parking demand:

- Free shuttle service from Punta Gorda Airport to Resort for guests,
- On-site carshare/rental service provided by Enterprise Rent-A-Car,
- Shared parking strategy (i.e. no reserved parking),
- Valet parking for restaurants and hotel,
- Easy accessibility and access around Resort between land uses,
- Incentivize guests to eat and play at Resort,
- Exclusive use of pool, spa and fitness center for guests, and
- Package deal with flight and hotel through Allegiant Airlines.

Each of these strategies are aimed at improving convenience for guests and helping to reduce the parking demand.

**Allegiant Database Analysis**

Allegiant Airlines markets to a database of previous and potential customers through emails and mailers. It is these people that will be potential guests at Sunseeker Resort. In 2017, the Allegiant database consisted of approximately 1.5 million active people. This database has, on average, been increasing by approximately 23.1% per year cumulatively. By 2021, when the Sunseeker Resort is online, it is projected that the database will consist of approximately 3.5 million active people. The Innovation Group, which was hired by Allegiant to conduct a Market Assessment, assessed data collected throughout the years using database analytics to determine a capture rate of 3% per year. Thus, a total of 105,404 parties are projected to be captured from the Allegiant database. Allegiant tracks inbound and outbound traffic, which shows the average traveler to and from Punta Gorda Airport stays 5.6 days. However, it is assumed that, on average, 1.5 days of a groups trip will be spent outside of the Sunseeker Resort, resulting in an average length of stay of 4.5 days at the Resort.

**Table 1** provides a summary of the calculation to determine the projected number of daily stays generated from the Allegiant database. It is projected that 474,317 days of stays could potentially be generated from the Allegiant database. There is a total capacity of 545,675 days available in a year between the hotels and hotel/condo units, which includes the capacity of the lockout units. Based on this analysis, potentially 87% of all guests would be from the Allegiant database. However, a hotel does not operate at capacity every day. If successful, a hotel operates at 90% capacity throughout the year, which would equate to 489,465 total days. This means that potentially 97% of all guests would be from the Allegiant database. This shows that the hotel could potentially be mostly filled from non-regional guests who are flying into Punta Gorda Airport through Allegiant Airlines. However, to be conservative it was assumed that only 75% of guests would use Allegiant Airlines and the other 25% would be from the region and driving to the Resort.

Table 1: Assessment of Non-Regional Allegiant Generated Stays

<b>Assessment of Allegiant (Non-Regional) Generation</b>	
Active Allegiant Database in 2017	1,532,204 people
Allegiant Projected Database in 2021 <sup>(1)</sup>	3,513,459 people
Capture Rate <sup>(2)</sup>	3%
Captured Database	105,404 parties
Average Days per Stay <sup>(3)</sup>	4.5 days
<b>Total Allegiant Database Stays</b>	<b>474,317 days</b>
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Hotel Rooms	537 rooms
Condo/Hotel Units	958 units
Days per Year	365 days
<b>Total Hotel and Condo Nights per Year</b>	<b>545,675 days</b>
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<b>Potential % of Allegiant Database Resort Guests</b>	<b>87%</b>

<sup>1</sup> Based on a cumulative growth rate of 23.1%

<sup>2</sup> Projected captured clients from database

<sup>3</sup> Based on Allegiant travel data for Punta Gorda

**Mode Split Analysis**

As mentioned previously, one of the major factors in calculating parking needs is determining the mode split factor for hotel and condo/hotel guests, which represents the percentage of guests using the shuttle or a rideshare/taxi from the Airport and not driving either their own or a rental vehicle to the Resort. Based on the previous analysis, it is conservatively assumed that 25% of guests will drive to the Resort from the region and 75% will fly on Allegiant Airlines. Of the guests taking Allegiant Airlines, it was assumed, 75% will take the free shuttle or a rideshare/taxi to the resort and 25% will rent a vehicle. This is also a conservative assumption since it will be substantially more cost effective for a patron to take the free shuttle and use the Enterprise rideshare/rental service versus renting a vehicle for their entire stay. However, some people will want the freedom of having their own vehicle available. Based on this analysis, it is estimated that 56% of all hotel and hotel/condo guests will use a shuttle and not have a vehicle.

Table 2: Hotel and Hotel/Condo Guests Mode Split Analysis

<b>Mode Split Calculation</b>	
Hotel/Condo Units	1,495 units
% Driving from the Region	25%
% Flying on Allegiant	75%
% Allegiant Customers Using Shuttle	75%
# of Parties Driving to Resort	654 parties
# of Parties Shuttling to Resort	841 parties
<b>Mode Split Factor for Hotel/Condo</b>	<b>56%</b>

**Captive Factor for Restaurant**

A substantial amount of restaurant space (97,170 square feet) is planned at the Sunseeker Resort. A big consideration is what percentage of the restaurant demand will be captured by hotel and hotel/condo guests staying at the Resort versus people from the region. The captive factor represents people staying at the hotel and hotel/condos who are already captive at the Resort and will visit other land uses (i.e. restaurant, fitness center, banquet, etc.) versus a non-hotel guest visiting one of the Resort amenities. **Table 3** provides a summary of the restaurant captive factor analysis.

The restaurant parking demand, based on the County’s Code of Ordinances, is 972 parking spaces. Based on the Urban Land Institutes (ULI) *Shared Parking, 2<sup>nd</sup> Edition*, 85% of the parking demand for restaurant is generated by customers versus employees. This means that 826 parties (972 x 0.85 = 826) of customers would patronize the restaurants during the peak period. It was conservatively assumed that only 50% of guests at the Resort eat on-site versus going off-site or attending a banquet or meeting event. Later in the report the captive factor for ballroom and meetings is calculated, which accounts for the number of guests eating at the Resort restaurants. Based on this analysis, a total of 745 Resort guest parties would patronize the restaurants during the peak period. This equates to 90% of total restaurant customers projected (i.e. 745 Resort guest restaurant parties divided by 826 total restaurant parties). To be conservative it was assumed that only 75% of the restaurant patrons would be Resort guests and the other 25% would be people driving from the region.



Table 3: Restaurant Captive Factor Analysis

<b>Restaurant Captive Factor Calculation</b>	
Restaurant/Bars/Lounges/Nightclubs	97,170 sf
Parking Demand Ratio <sup>(1)</sup>	10 spaces per ksf
Restaurant Parking Demand	972 spaces
Restaurant Customers <sup>(2)</sup>	826 parties
Hotel/Condo Units	1,490 units
% Hotel/Condo Guests On-Site Restaurant Patrons	50%
Restaurant Demand from On-Site Visitors	745 parties
<b>% Captive Factor for Restaurant</b>	<b>90%</b>

<sup>1</sup> Per Charlotte County Code of Ordinances (Sec. 3-9-79. - Off-street parking and loading facilities)

<sup>2</sup> Assumed 85% of parking demand is from customers based on ULI, Shared Parking, 2nd Edition

**Captive Factor for Ballroom and Meeting Space**

There is also a substantial amount of meeting and ballroom space at the Resort, which includes two ballrooms (1,414 seating capacity) and one meeting room (396 seating capacity). A substantial portion of the Resort guests will attend events at the ballrooms and meeting space. Based on previous studies at Opal Sands Resort and Sand Pearl Resort both in Clearwater Beach, Florida, the percentage of attendees staying at the resort ranges between 55% and 96%, with the average at about 75%. This is based on surveys conducted of five (5) of the largest events in 2017 and 2018 at each Resort. **Tables 4 and 5** provide the results of the event parking demand analysis for the Opal Sands Resort and Sand Pearl Resort. This analysis shows that a high percentage of event attendees are staying at the resorts.

**Table 6** provides a summary of the captive factor analysis for the Sunseeker Resort. The ballroom/meeting space guest parking demand, based on the County’s Code of Ordinances, is 610 parking spaces. Approximately 745 parties would remain from the guests patronizing the on-site restaurants. It was assumed that 50% of the remaining Resort guests (373 parties) would attend an event at the ballroom and meeting space, which means that 25% of the remaining Resort guests would eat off-site (i.e. 50% at Resort restaurant, 25% at meeting/ballroom, and 25% off-site). This equates to a 61% captive factor for the ballroom and meeting space, which is a conservative assumption compared to the studies of events at other resorts with a 75% average captive factor.

Table 4: Opal Sands Resort Event Parking Demand Analysis

Opal Sands Resort Event	Event Attendees Staying at Opal Sands Resort	Total Event Attendance	Event Attendees Not Staying at Opal Sands Resort	Percentage of Attendees Staying at Resort
Big Sky	187	275	88	68%
Access Group	191	250	59	77%
Corporate Service	221	230	9	96%
All State	174	314	140	55%
Northeast Amyotrophic Lateral Sclerosis Consortium	190	300	110	63%

Table 5: Sand Pearl Resort Event Parking Demand Analysis

Sand Pearl Resort Event	Event Attendees Staying at Opal Sands Resort	Total Event Attendance	Event Attendees Not Staying at Opal Sands Resort	Percentage of Attendees Staying at Resort
American Association of Insurance Services	178	190	12	94%
Alliant	160	234	74	68%
Raymond James	217	250	33	87%
BST Global	144	200	56	72%
Noble Systems	181	260	79	70%

Table 6: Ballroom/Meeting Space Captive Factor Analysis

**Restaurant Captive Factor Calculation**

Restaurant/Bars/Lounges/Nightclubs	97,170 sf
Parking Demand Ratio <sup>(1)</sup>	10 spaces per ksf
Restaurant Parking Demand	972 spaces
Restaurant Customers <sup>(2)</sup>	826 parties
Hotel/Condo Units	1,495 units
% Hotel/Condo Guests On-Site Restaurant Patrons	50%
Restaurant Demand from On-Site Visitors	748 parties
<b>% Captive Factor for Restaurant</b>	<b>91%</b>

<sup>1</sup> Per Charlotte County Code of Ordinances (Sec. 3-9-79. - Off-street parking and loading facilities)

<sup>2</sup> Assumed 85% of parking demand is from customers based on ULI, Shared Parking, 2nd Edition

### Shared Parking Analysis

A shared parking analysis was conducted to determine the overall peak parking demand for the Sunseeker Resort development. The shared parking analysis applies the methodology from ULI *Shared Parking, 2<sup>nd</sup> Edition*. This methodology accounts for modal split, captive factor, time of day factors, and monthly factors. The parking demand ratios from the Charlotte County Code of Ordinances (Sec. 3-9-79. – Off-street parking and loading facilities) was applied in the shared parking model for each of the land uses.

It should be noted that the Resort plans to include 319 hotel/condo lock-out units, which would allow an owner to split a two-bedroom unit and rent it as two one-bedroom units. It was conservatively assumed that all 319 lock-out units would be made available as part of the parking needs analysis, even-though there will be no requirement for the hotel/condo owners to rent them out.

Many assumptions were applied as part of this analysis. Many of these assumptions were defined previously (i.e. restaurant and ballroom/meeting space captive factors, mode splits, etc.). Below is a summary of the assumptions applied as part of the shared parking analysis:

- Parking requirements per land use as stated in the Charlotte County Code of Ordinance;
- Conservatively assumed all lock-out units (319) in the hotel/condo would be rented separately by the owners;
- Due to the small amount of retail space (3,881) assumed all customers are captive guests at the Resort;
- Retail employees are generated at 1 space per 1,000 square feet, which is 20% (based on ULI) of the County's parking requirement of 5 spaces per 1,000 square feet;
- 75% captive factor for restaurant space;
- 61% captive factor for ballroom and meeting space;
- Since only Resort guests can use the fitness center and spa assumed all visitors to the spa and fitness center are captive guests at the Resort;
- Fitness center/spa employees are generated at 0.4 spaces per 1,000 square feet, which is approximately 6% (based on ULI) of the County's parking requirement of 1 space per 150 square feet;
- 56% mode split factor hotel and hotel/condo guests; and
- Marina parking is reserved.

Regarding mode split and captive factor for other land uses, if it is not referenced above than no mode split or captivity factor was applied. This is conservative especially with the growth in popularity of using rideshare (i.e. Uber and Lyft) which will continue to impact mode split and reduce parking demand.

**Table 7** provides a summary of the peak parking demands during the weekday and weekend. It is estimated that the peak parking period would be during a weekday or weekend at 9:00 PM with a peak parking need of 1,349 spaces. The Sunseeker Resort plans to provide between 1,445 and 1,450 spaces. The analysis shows that adequate parking will be provided to support the peak demand.

In addition to the parking being provided on-site, the developers are in discussion with the County regarding two separate projects, which include the Bayshore Parking Structure on Main Street and a development at the Melbourne Parcel located at Melbourne Street and Tamiami Trail (US Route 41). Neither of these projects are necessary to support the parking needs at the Sunseeker Resort. Adequate parking will be provided on-site.

### **ADA Parking Analysis**

The Sunseeker Resort plans to provide 36 ADA-accessible parking spaces. Per Charlotte County's Code of Ordinances ADA-accessible parking spaces should be provided in accordance with Florida Statute and the Florida Accessibility Code within the Florida Building Code. Per the *2012 Florida Accessibility Code for Building Construction*, 20 spaces, plus 1 space for each 100, or fraction thereof, over 1,000 spaces is the minimum requirement for accessible parking spaces. If 1,450 total spaces are provided at the Resort, then the minimum parking requirement for accessible parking is 25 spaces. The Sunseeker Resort meets the required number of ADA accessible parking spaces by providing 36 ADA-accessible spaces.



Table 7: Sunseeker Resort Shared Parking Analysis Results Summary

Land Use	Project Data Quantity Unit		Weekday					Weekend					Weekday			Weekend											
			Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Peak Hr Adj	Peak Mo Adj	Estimated Parking Demand	Peak Hr Adj	Peak Mo Adj	Estimated Parking Demand									
													9 PM	August		8 PM	August										
Community Shopping Center (<400 ksf) Employee	3,881	sf GLA	4.00 1.00	1.00 1.00	0.00 1.00	0.00 1.00	/ksf GLA /ksf GLA	4.00 1.00	1.00 1.00	0.00 1.00	0.00 1.00	/ksf GLA /ksf GLA	0.50 0.75	0.69 0.80	0 2	0.65 0.75	0.69 0.80	0 2									
Fine/Casual Dining Restaurant Employee	97,170	sf GLA	10.00 0.00	1.00 1.00	0.25 1.00	2.50 0.00	/ksf GLA /ksf GLA	10.00 0.00	1.00 1.00	0.25 1.00	2.50 0.00	/ksf GLA /ksf GLA	1.00 1.00	0.99 1.00	241 0	1.00 1.00	0.99 1.00	241 0									
Conference Ctr/Banquet Employee	1,829 30	seats	0.33 0.02	1.00 1.00	0.39 1.00	0.13 0.02	/seat /seat	0.33 0.02	1.00 1.00	0.39 1.00	0.13 0.02	/seat /seat	1.00 0.20	1.00 0.75	235 5	1.00 0.55	1.00 0.90	235 15									
Health Club Employee	9,330	sf GLA	6.26 0.40	1.00 1.00	0.00 1.00	0.00 0.40	/ksf GLA /ksf GLA	6.26 0.40	1.00 1.00	0.00 1.00	0.00 0.40	/ksf GLA /ksf GLA	0.70 0.20	0.70 0.80	0 1	0.30 0.50	0.70 0.80	0 2									
Hotel-Leisure Employee	537	rooms	1.00 0.03	0.44 1.00	1.00 1.00	0.44 0.03	/rooms /rooms	1.00 0.03	0.44 1.00	1.00 1.00	0.44 0.03	/rooms /rooms	0.95 0.20	1.00 1.00	224 3	0.90 0.55	1.00 1.00	213 9									
Residential, Rental, Shared Spaces Reserved Spaces	958	units	1.50	0.44	1.00	0.66	/unit	1.50	0.44	1.00	0.66	/unit	0.99	1.00	626	0.98	1.00	620									
Guest	958	sp/unit	0	1.00	1.00	0	/unit	0	1.00	1.00	0	/unit	1.00	1.00	0	1.00	1.00	0									
Marina	124	units	0.00	1.00	1.00	0.00	/unit	0.00	1.00	1.00	0.00	/unit	0.99	1.00	0	0.98	1.00	0									
Marina	0	sp/unit	0.10	1.00	1.00	0.10	/unit	0.10	1.00	1.00	0.10	/unit	1.00	1.00	12	1.00	1.00	12									
Guest	124	units	0.00	1.00	1.00	0.00	/unit	0.00	1.00	1.00	0.00	/unit	1.00	1.00	0	1.00	1.00	0									
ULI base data have been modified from default values.												Customer	700	Employee	637	Reserved	12	Total	1349	Customer	689	Employee	648	Reserved	12	Total	1349

## Conclusions

A parking needs analysis was performed for the proposed Sunseeker Resort. This is a unique project since it will provide a number of amenities to reduce parking demand, including a free shuttle from the Punta Gorda Airport, rental car delivery service, valet service, and a business model to keep people on-site with various amenities (i.e. restaurants, large pool, retail, marina, and fitness center/spa).

The County's parking requirements in the Code of Ordinances calculates a parking need of 4,168 spaces. However, this analysis does not consider shared parking, mode split, captive factors, or the unique nature of this resort development. A parking needs analysis was conducted which accounts for the unique attributes of the development regarding the following issues:

- Mode split of Resort guests,
- Captive factors for restaurant and meeting/ballroom space, and
- Shared parking management.

This calculation does not apply any parking reduction for valet service which can allow double parked vehicles, or mode split for non-hotel guest activity. Also, the 319 lock-out units included in the parking needs analysis represent approximately 33% of all hotel/condo units, and there is no guarantee that these units will ever be rented out separately by the owners. Overall, it is estimated that the peak parking demand is during a weekday or weekend evening when 1,349 spaces are needed. The Sunseeker Resort plans to provide between 1,445 and 1,450 spaces, which would adequately support the peak parking demand. Of the 1,450 spaces a total of 36 ADA-accessible spaces are planned which will exceed the minimum requirement of 25 ADA-accessible spaces per the *2012 Florida Accessibility Code for Building Construction*.

At the request of Charlotte County, the analysis set forth herein is based on maximum parking requirements at full buildout of all design elements of the Sunseeker Resort. The developer may elect to construct the Project in multiple phases and the initial site plan application may not reflect simultaneous construction of all Project elements. Moreover, certain elements of the Project may change with the evolution of the Developer's program for the Project. Site plan applications will incorporate the appropriate number of parking spaces based upon the parking requirements for each land use as determined herein.

Please review this analysis and let us know if you have any questions.

Very truly yours,

**KIMLEY-HORN AND ASSOCIATES, INC.**

David Taxman, P.E.  
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