

# CORRADINO

Exhibit "7"

Date: May 15, 2012  
To: Christy Dominguez  
Director Planning and Zoning Department  
From: Joseph M. Corradino, AICP  
RE: Beachwalk Parking Review

This memorandum documents the findings of the review of the proposed parking standard for Beachwalk All-Suite Hotel prepared by Greenberg Traurig dated November 8, 2011.

The City has not been convinced that the proposed parking is adequate to support the proposed use, as it has not been justified and is significantly different from the standard set forth by the City of Hallandale. In November 2011, the applicant submitted a memorandum attempting to justify the proposed standard of 0.6 space per unit, by:

- 1) summarizing an attached study of parking in the Florida Keys,
- 2) referencing a study by the City of Fort Lauderdale,
- 3) comparing parking rates of other cities.

The Keys study reports a parking occupancy rate for multi-room units greater than what Hallandale requires as its standard. The Fort Lauderdale study suggests a rate significantly less than Hallandale requires, but still higher than the 0.6 being suggested by the applicant. A comparison of other communities suggests that Hallandale's rate is adequate. Even the suburban hotel average rate from the Institute of Transportation Engineers. (ITE) 4th Edition, is 0.89. As a result the reviewer believes that Hallandale's rate is adequate and that it should not be varied to 0.6. If it were to be varied to any degree at all mitigation should be required.

To summarize the applicants argument, The Keys study examined nine resort properties in between Key Largo and Marathon. It attempts to determine if there are differences in occupancy rates between different types of resort accommodations, as well as if there are differences in the numbers of vehicles that guests and others bring onto the various properties. A survey of properties was gathered between August 27 and September 13,

# CORRADINO

Exhibit "7"

a time which could be considered the peak of hurricane season. The Study points out that clientele who elect a multi-bedroom resort suite instead of a traditional unit are only slightly more likely to arrive with their entire travel party in two vehicles instead of one vehicle. Multi room suites require more than one vehicle per occupied unit, which is more parking than what the Hallandale code requires, at 1 space per guest room. This analysis does not support the applicant's proposal to have 0.6 spaces per room. In fact it more closely supports the need to have closer to 1.0 or more spaces per room.

The Fort Lauderdale study suggests that 68% of the guests will need parking based on the 22% of the guests will need parking because they will come with a rental car, and 46% of the guests will drive a car to the site because they drove a car to Broward County. While it can generally be agreed, as the applicants memorandum points out, that travelers in such a close proximity to the airport as Hallandale would have a more balanced mode split, South Florida in general is an automobile oriented community, with few effective multimodal options to reach the wide spread regional destinations. The Fort Lauderdale Barrier Island Parking Study, was not produced for or by the City of Hallandale, and therefore was not reviewed in sufficient detail as to be relevant to this analysis. Regardless, Fort Lauderdale and Hallandale likely have differences in how visitors need or use vehicles. A detailed examination of Hallandale parking occupancies would reveal these. Hallandale lacks the compact urban core of Fort Lauderdale, and the local area necessitates vehicular use. The 0.68 rate suggested in this study is still higher than the 0.6 rate proposed by Beachwalk.

In a review of other standards from cities in the area, most have standards similar to that of Hallandale, including Aventura, Miami Beach Deerfield Beach, Hollywood, Dania Beach and West Palm Beach, with typically 1 space required for each guest room. In Fort Lauderdale's RAC District-City Center 0.6 spaces per room is the standard. In Miami Beach, only when the number of units eclipses 500 is the standard lowered to 0.75 spaces per room. In Miami's most urban area the standard is 1 space per 2 units. Hallandale is not similar to the cores of these communities. Additionally, the suburban hotel average rate from the Institute of Transportation Engineers (ITE) 4th Edition, is 0.89. It is very likely that visitors to Beachwalk would be traveling to Fort Lauderdale, Miami or Miami Beach for visits. Additionally the area surrounding Beachwalk is minimally walkable. The immediate area is fractured by canals a multi-lane divided

# CORRADINO

Exhibit "7"

highways and suburban type big box retail. Hallandale is not urban enough to warrant parking rates much lower than 1 space per room without mitigation. To suggest a parking rate lesser than that of Miami Beach is questionable.

In regards to Hallandale's Comprehensive Plan, Policy 1.1.2 states that any development order or permit shall only be approved when adequate public services or facilities exist. Parking is integral to the provision of these services. Facilities with lack of parking can have severe impacts on surrounding neighborhoods disrupting traffic, displacing existing parkers and diminishing the quality of life of a community. The City's level of service standard for parking is 1 space per unit. The community is built to that standard, and has not been shown to be equipped to differ from it to any significant degree. The lack of detailed local examples specific to local occupancy makes it difficult to vary from the existing approved standard with confidence. It appears that the applicant will need to apply for a waiver to obtain the proposed parking standard. It is suggested that the applicant add to their justification of demand, an explanation of the hardship that exists that would necessitate a waiver. At this time no apparent evidence of hardship exists to warrant a waiver to the extent being requested. Yet it is plausible that some discount in required parking could be granted based on the level of contribution of multimodal transportation that visitors could use to access the places that they would with a private automobile. If any waiver were to be granted, it is recommended that it be minimal to slowly move the community into that direction. Caution should be taken in this regard for the appearance of setting a precedent without a detailed examination. A 40% reduction in the parking standard should not be entered into without significant consideration of the issues and long term consequences of such an action.

**Memorandum**

**TO:** Mark Antonio, City Manager, City of Hallandale Beach  
Nydia Rafols Sallabery, Deputy City Manager  
Christy Dominguez, Director, Planning and Zoning  
Thomas J. Vageline, Director, Development Services  
V. Lyn Whitfield, City Attorney  
Joseph M. Corradino, AICP - The Corradino Group

**CC:** Carlos Rosso- Related Group  
Eric Fordin - Related Group

**FROM:** Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP - Director of Planning Services  
Richard Cannone, Planning Administrator - Calvin, Giordano Associates, Inc.

**DATE:** May 25, 2012

**RE:** Applicant Response to May 15, 2012 Memo from Joe Corradino to Christy Dominguez regarding the November 8, 2011 Memorandum from Greenberg Traurig

---

The numbered statements below are from the May 15<sup>th</sup> Memo. The Applicant's responses are in *italics* below:

1. Page 1. "Keys study reports a parking occupancy rate for multi-room suites greater than what Hallandale requires as its standard."

*The Keys study documents a demand of 1.08 spaces per suite, while the Hallandale standard would require 2.0 spaces for a two room suite.*

2. Page 1. The ITE documents an average rate of .89 for suburban hotels.

*This finding fails to acknowledge that the ITE documents an average rate of .64 for urban hotels.*

3. Page 2. "Multi-room suites require more than one vehicle per occupied unit, which is more parking than what the Hallandale Code requires at 1 space per guest room."

*This finding fails to recognize that the City's parking code effectively requires two parking spaces per suite unit, which is much higher than the documented parking demand for suites.*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 2

---

4. Page 2. "The Fort Lauderdale study suggests that 68% of the guests will need parking based on the 22% of the guests will need parking (sic) because will come with a rental car, and 46% of the guests will drive a car to the site because they drove a car to Broward County."

*There is apparently some confusion, since the reviewer cites to the Fort Lauderdale study for analyses that were presented in the Beachwalk study. The percentages cited by the reviewer are not from the Fort Lauderdale Study. These percentages are calculated in the November 8 report submitted on behalf of the applicant, and are presented in Attachment C to the report.*

*The Fort Lauderdale Study documents a demand of .49 spaces per room. As explained in the November 8 report, the study recommended .57, incorporating a 15 factor to account for driver perception that the parking lot is fully utilized at 85% usage. This factor is not appropriate for valet service. Beachwalk proposes a standard that requires 20% additional parking as compared to the demand documented in Fort Lauderdale.*

5. Page 2. "The .68 rate suggested in this study is still higher than the .6 rate proposed by Beachwalk"

*The .68 rate is utilized in calculating the parking demand. As presented in Table 2 of the report, the basic .68 rate is increased by an additional 8% for suites based on the differential documented in the Keys survey. These rates are then applied at .68 for lock out rooms and .7344 (.68 X 1.08) for suites. The analysis conservatively assumes that no more than 50% of the units will be utilized as suites, even though the anticipated percentage is 70-80%. The review comments consistently fail to recognize this point. .*

6. Pages 2-3. The review comments characterize Hallandale as suburban and not walkable. The comments state:

- Hallandale lacks the compact urban core of Fort Lauderdale.
- The local area necessitates vehicular use.
- The immediate area is fractured by canals, a multi-lane divided highways (sic) and suburban type big box.
- Hallandale is not urban enough to warrant parking rates much lower than 1 space per room without mitigation.

*The proposed standard is 20% higher than Fort Lauderdale's standard. In addition, the City has implemented policy direction which recognizes and further supports the urban character of the City.*

*On February 18, 2009 the City Commission adopted a Citywide Master Plan guided by a number of basic principles that are common to the smart growth, new urbanist, traditional neighborhood development, and similar planning frameworks. Those principles were reinforced*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 3

---

*by the adopted City's Vision statement for the Master Plan to "shape development of a vibrant, mixed use, sustainable, pedestrian-oriented urban environment with an appealing character and sense of place"*

*In addition to the Citywide Master Plan, the City Commission also adopted a Citywide Transportation Study that included the development of a traffic cost model to determine project impacts and the associated costs of accommodating traffic from the development activity in the City. Additionally, the plan and subsequent implementing ordinance that assess a mitigation fee on all new development in the city, identifies and prioritize appropriate facility improvements and mitigation strategies to ensure adequate mobility in the future. Included in those strategies were transit, bicycle and pedestrian improvements to further strengthen the policy direction given by the City Commission in strengthening Hallandale Beach as an urban destination.*

*The reviewer does not reference the policy direction adopted by the City Commission outlined in the Citywide Master Plan or Citywide Transportation Study.*

*The reviewer also states that Hallandale is not urban enough. However, one of the key factors in determining an urban area is population density. It should be noted that Hallandale Beach has a population density of 8,156 people per square mile; the highest in Broward County.*

*A sample of Broward County reveals a population density per square mile for Fort Lauderdale to be 5,221, Hollywood at 5,156 and Weston at 2,500.*

*Additionally, the attached graphic clearly shows the walkability of the site consistent with what was approved in the Citywide master plans.*

*In regard to the final comment, the reviewer fails to recognize the difference between suites and rooms in calculating parking demand.*

7. Pages 2-3. The review comments suggest guests will make long distance trips. The review comments state:

- South Florida in general is an automobile oriented community.
- Few effective multimodal options to reach the widespread regional destinations
- Visitors to Beachwalk would be traveling to Fort Lauderdale, Miami or Miami Beach for visits

*These comments fail to recognize that nearly half of the guests will arrive with their own vehicle. Guests intending to make regular regional trips would typically bring their own vehicle. Guests arriving by other means, such as the free shuttle, would utilize an occasional taxi for trips to Fort Lauderdale. For the few trips to Miami or Miami Beach by guests that do not arrive by vehicle, it would be reasonable to assume that those guests would use a shuttle to pick up a*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 4

---

*rental car, return the rental car and use the shuttle to return to the hotel. If for any reason, the rental car were occasionally parked overnight for those guests, Table 2 of the report documents a surplus of 34 spaces as compared to the projected demand. Finally, this comment fails to recognize that Beachwalk will function as a destination resort with the beach and immediate surrounding area functioning as the primary attraction for Beachwalk guests.*

8. Page 3. Policy 1.1.2 states that any development order or permit shall only be approved when adequate public services or facilities exist. Parking is integral to the provision of these services.

*Policy 1.1.2 applies to public infrastructure and has nothing to do with the parking standard. The following comprehensive plan policies are relevant to this analysis and address the City's objective to support strategies to support innovative alternatives to automobile reliance:*

*FLUE Policy 1.12.4: The City shall maintain innovative land development regulations that encourage mixed use developments and incorporate site design and planning techniques that will enhance the quality of large scale developments or redevelopment areas.*

*P. 2-61: The comprehensive plan states the City will implement strategies to reduce greenhouse gas emissions, including:*

- *mixed use developments*
- *infill and redevelopment*
- *intermodal transportation connections*
- *facilitating the capacity to bicycle and walk*

*In discussing these strategies, the comprehensive plan states:*

*"The City of Hallandale has implemented a number of these strategies. There is a generally continuous pedestrian and bikeways throughout the City, especially in close proximity to and abutting mass transit routes. The City is relatively compact and nearly built out with the highest intensity of development located along major transportation routes (US 1/ Hallandale Beach Boulevard/ Pembroke Road/ SR A1A)."*

*In describing the City's objective for intensification, p. 2-63 states that:*

*The City allows some of the highest residential densities in South Florida. This facilitates a decrease in the number of trips and drive times for residents conducting routine shopping trips or outings for dining or entertainment experiences.*

*The City's own planning analysis further describes the City as "a compact, fixed boundary built out community with a defined footprint and density."*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 5

---

*Contrary to the review comments, the City clearly describes itself as a highly urbanized community that seeks to support multimodal alternatives. Beachwalk proposes a parking standard that is consistent with the comprehensive plan based on the City's urban character and the objectives to support alternatives to automobile dependency. The proposed standard is also consistent with the Central Business District zoning designation that promotes intensification to achieve a pedestrian friendly environment based on the comprehensive plan direction.*

*Beachwalk should be commended for proposing a free shuttle service to support the City's objectives.*

### **Conclusion**

The review comments fail to recognize many critical points that support the proposed standard. The analysis estimates 68% of guests will arrive by automobile (personal or rental car) as compared to the 76.2% region-wide figure documented by Corradino in the Travel Characteristics Study from 2000 (Table 4-8, Travel to Hotel). Beachwalk would achieve a substantially lower figure than the region wide average based on its proximity to the airport, availability of free shuttle and the appeal of Beachwalk and the surrounding area as a destination. The region wide figure reflects an average for all tourists, reflecting nearly 100% for tourists staying in hotels in western cities and necessarily reflecting a much lower percentage for coastal hotels in order to reach an average of 76.2%. It is reasonable to assume that Beachwalk's location and attributes would yield a reduction much lower than the 11% reduction utilized for the parking demand analysis. In addition, the Keys surveys clearly demonstrate that suites utilized as a single unit should be treated as suites rather than two independent rooms in terms of parking demand. This means that the suites will generate slightly higher parking at 1.08, clearly demonstrating that the code standard of two parking spaces for a two-room suite is quite excessive. The review comments seem to suggest that all suites should be treated as two single rooms. This would result in an excess amount of parking that is inconsistent with the objectives of the comprehensive plan. The simple reality is that this type of destination hotel will generate substantial demand for suites over lock outs and will generate parking demands substantially below the regional average.

**Memorandum**

**TO:** Mark Antonio, City Manager, City of Hallandale Beach  
Nydia Rafols Sallabery, Deputy City Manager  
Christy Dominguez, Director, Planning and Zoning  
Thomas J. Vageline, Director, Development Services  
V. Lyn Whitfield, City Attorney  
Joseph M. Corradino, AICP - The Corradino Group

**CC:** Carlos Rosso- Related Group  
Eric Fordin - Related Group

**FROM:** Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP - Director of Planning Services  
Richard Cannone, Planning Administrator - Calvin, Giordano Associates, Inc.

**DATE:** May 25, 2012

**RE:** Applicant Response to May 15, 2012 Memo from Joe Corradino to Christy Dominguez regarding the November 8, 2011 Memorandum from Greenberg Traurig

---

The numbered statements below are from the May 15<sup>th</sup> Memo. The Applicant's responses are in *italics* below:

1. Page 1. "Keys study reports a parking occupancy rate for multi-room suites greater than what Hallandale requires as its standard."

*The Keys study documents a demand of 1.08 spaces per suite, while the Hallandale standard would require 2.0 spaces for a two room suite.*

2. Page 1. The ITE documents an average rate of .89 for suburban hotels.

*This finding fails to acknowledge that the ITE documents an average rate of .64 for urban hotels.*

3. Page 2. "Multi-room suites require more than one vehicle per occupied unit, which is more parking than what the Hallandale Code requires at 1 space per guest room."

*This finding fails to recognize that the City's parking code effectively requires two parking spaces per suite unit, which is much higher than the documented parking demand for suites.*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 2

---

4. Page 2. "The Fort Lauderdale study suggests that 68% of the guests will need parking based on the 22% of the guests will need parking (sic) because will come with a rental car, and 46% of the guests will drive a car to the site because they drove a car to Broward County."

*There is apparently some confusion, since the reviewer cites to the Fort Lauderdale study for analyses that were presented in the Beachwalk study. The percentages cited by the reviewer are not from the Fort Lauderdale Study. These percentages are calculated in the November 8 report submitted on behalf of the applicant, and are presented in Attachment C to the report.*

*The Fort Lauderdale Study documents a demand of .49 spaces per room. As explained in the November 8 report, the study recommended .57, incorporating a 15 factor to account for driver perception that the parking lot is fully utilized at 85% usage. This factor is not appropriate for valet service. Beachwalk proposes a standard that requires 20% additional parking as compared to the demand documented in Fort Lauderdale.*

5. Page 2. "The .68 rate suggested in this study is still higher than the .6 rate proposed by Beachwalk"

*The .68 rate is utilized in calculating the parking demand. As presented in Table 2 of the report, the basic .68 rate is increased by an additional 8% for suites based on the differential documented in the Keys survey. These rates are then applied at .68 for lock out rooms and .7344 (.68 X 1.08) for suites. The analysis conservatively assumes that no more than 50% of the units will be utilized as suites, even though the anticipated percentage is 70-80%. The review comments consistently fail to recognize this point. .*

6. Pages 2-3. The review comments characterize Hallandale as suburban and not walkable. The comments state:

- Hallandale lacks the compact urban core of Fort Lauderdale.
- The local area necessitates vehicular use.
- The immediate area is fractured by canals, a multi-lane divided highways (sic) and suburban type big box.
- Hallandale is not urban enough to warrant parking rates much lower than 1 space per room without mitigation.

*The proposed standard is 20% higher than Fort Lauderdale's standard. In addition, the City has implemented policy direction which recognizes and further supports the urban character of the City.*

*On February 18, 2009 the City Commission adopted a Citywide Master Plan guided by a number of basic principles that are common to the smart growth, new urbanist, traditional neighborhood development, and similar planning frameworks. Those principles were reinforced*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 3

---

*by the adopted City's Vision statement for the Master Plan to "shape development of a vibrant, mixed use, sustainable, pedestrian-oriented urban environment with an appealing character and sense of place"*

*In addition to the Citywide Master Plan, the City Commission also adopted a Citywide Transportation Study that included the development of a traffic cost model to determine project impacts and the associated costs of accommodating traffic from the development activity in the City. Additionally, the plan and subsequent implementing ordinance that assess a mitigation fee on all new development in the city, identifies and prioritize appropriate facility improvements and mitigation strategies to ensure adequate mobility in the future. Included in those strategies were transit, bicycle and pedestrian improvements to further strengthen the policy direction given by the City Commission in strengthening Hallandale Beach as an urban destination.*

*The reviewer does not reference the policy direction adopted by the City Commission outlined in the Citywide Master Plan or Citywide Transportation Study.*

*The reviewer also states that Hallandale is not urban enough. However, one of the key factors in determining an urban area is population density. It should be noted that Hallandale Beach has a population density of 8,156 people per square mile; the highest in Broward County.*

*A sample of Broward County reveals a population density per square mile for Fort Lauderdale to be 5,221, Hollywood at 5,156 and Weston at 2,500.*

*Additionally, the attached graphic clearly shows the walkability of the site consistent with what was approved in the Citywide master plans.*

*In regard to the final comment, the reviewer fails to recognize the difference between suites and rooms in calculating parking demand.*

7. Pages 2-3. The review comments suggest guests will make long distance trips. The review comments state:

- South Florida in general is an automobile oriented community.
- Few effective multimodal options to reach the widespread regional destinations
- Visitors to Beachwalk would be traveling to Fort Lauderdale, Miami or Miami Beach for visits

*These comments fail to recognize that nearly half of the guests will arrive with their own vehicle. Guests intending to make regular regional trips would typically bring their own vehicle. Guests arriving by other means, such as the free shuttle, would utilize an occasional taxi for trips to Fort Lauderdale. For the few trips to Miami or Miami Beach by guests that do not arrive by vehicle, it would be reasonable to assume that those guests would use a shuttle to pick up a*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 4

---

*rental car, return the rental car and use the shuttle to return to the hotel. If for any reason, the rental car were occasionally parked overnight for those guests, Table 2 of the report documents a surplus of 34 spaces as compared to the projected demand. Finally, this comment fails to recognize that Beachwalk will function as a destination resort with the beach and immediate surrounding area functioning as the primary attraction for Beachwalk guests.*

8. Page 3. Policy 1.1.2 states that any development order or permit shall only be approved when adequate public services or facilities exist. Parking is integral to the provision of these services.

*Policy 1.1.2 applies to public infrastructure and has nothing to do with the parking standard. The following comprehensive plan policies are relevant to this analysis and address the City's objective to support strategies to support innovative alternatives to automobile reliance:*

*FLUE Policy 1.12.4: The City shall maintain innovative land development regulations that encourage mixed use developments and incorporate site design and planning techniques that will enhance the quality of large scale developments or redevelopment areas.*

*P. 2-61: The comprehensive plan states the City will implement strategies to reduce greenhouse gas emissions, including:*

- *mixed use developments*
- *infill and redevelopment*
- *intermodal transportation connections*
- *facilitating the capacity to bicycle and walk*

*In discussing these strategies, the comprehensive plan states:*

*"The City of Hallandale has implemented a number of these strategies. There is a generally continuous pedestrian and bikeways throughout the City, especially in close proximity to and abutting mass transit routes. The City is relatively compact and nearly built out with the highest intensity of development located along major transportation routes (US 1/ Hallandale Beach Boulevard/ Pembroke Road/ SR A1A)."*

*In describing the City's objective for intensification, p. 2-63 states that:*

*The City allows some of the highest residential densities in South Florida. This facilitates a decrease in the number of trips and drive times for residents conducting routine shopping trips or outings for dining or entertainment experiences.*

*The City's own planning analysis further describes the City as "a compact, fixed boundary built out community with a defined footprint and density."*

To: City of Hallandale Beach  
From: Debbie M. Orshefsky, Esq.  
Kenneth B. Metcalf, AICP  
Richard Cannone, Planning Administrator, CGA  
Date: May 25, 2012  
Page 5

---

*Contrary to the review comments, the City clearly describes itself as a highly urbanized community that seeks to support multimodal alternatives. Beachwalk proposes a parking standard that is consistent with the comprehensive plan based on the City's urban character and the objectives to support alternatives to automobile dependency. The proposed standard is also consistent with the Central Business District zoning designation that promotes intensification to achieve a pedestrian friendly environment based on the comprehensive plan direction.*

*Beachwalk should be commended for proposing a free shuttle service to support the City's objectives.*

### **Conclusion**

The review comments fail to recognize many critical points that support the proposed standard. The analysis estimates 68% of guests will arrive by automobile (personal or rental car) as compared to the 76.2% region-wide figure documented by Corradino in the Travel Characteristics Study from 2000 (Table 4-8, Travel to Hotel). Beachwalk would achieve a substantially lower figure than the region wide average based on its proximity to the airport, availability of free shuttle and the appeal of Beachwalk and the surrounding area as a destination. The region wide figure reflects an average for all tourists, reflecting nearly 100% for tourists staying in hotels in western cities and necessarily reflecting a much lower percentage for coastal hotels in order to reach an average of 76.2%. It is reasonable to assume that Beachwalk's location and attributes would yield a reduction much lower than the 11% reduction utilized for the parking demand analysis. In addition, the Keys surveys clearly demonstrate that suites utilized as a single unit should be treated as suites rather than two independent rooms in terms of parking demand. This means that the suites will generate slightly higher parking at 1.08, clearly demonstrating that the code standard of two parking spaces for a two-room suite is quite excessive. The review comments seem to suggest that all suites should be treated as two single rooms. This would result in an excess amount of parking that is inconsistent with the objectives of the comprehensive plan. The simple reality is that this type of destination hotel will generate substantial demand for suites over lock outs and will generate parking demands substantially below the regional average.