ALEX ROARK ENGINEERING

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CONTACT

☎ 850-567-2044

drew@alexroarkeng.com

www.alexroarkeng.com

Lisa Robinson
c/o Jane Graham, Esq.
Sunshine City Law
737 Main Street
Suite 100
Safety Harbor, FL 34695

Dear Ms. Robinson,

Alex Roark Engineering has reviewed the Transportation Analysis for the proposed TradeWinds Island Grand Resort development prepared by Lincks & Associates, Inc. dated March 28, 2024 and we offer the following comments. Based on the comments below, to accurately reflect an analysis of the transportation conditions, the study will need to be revised.

1. **Background traffic growth does not match Forward Pinellas Level of Service Report.**

    a. In this analysis, the maximum traffic volume (peak hour peak direction) in 2029 on Gulf Boulevard from 75th Avenue to the Pinellas Bayway is 1,190. These volumes were developed using an annual growth rate of 2% per year based on 2023 traffic counts. However, the 2023 Forward Pinellas Level of Service Report, which used traffic counts from 2022 for their 2023 report, shows this segment of Gulf Boulevard with a traffic volume of 1,215. Therefore, it is not possible that both of these can be accurate as the report suggests that in 2029

the traffic volume will be 1,190 (maximum) which is less than the Forward Pinellas Level of Service Report from 2022. Note that if the 1,215 volume was used as a base volume grown at 2% per year and the other projects traffic were added to that background traffic, it is likely that segments of Gulf Boulevard would exceed a v/c ratio of 0.9 and would therefore be considered deficient.

2. Not All of the Project Traffic was Distributed or Analyzed.

The project traffic distribution from the project site distributes 63% to the north on Gulf Boulevard and 29% to the south on Gulf Boulevard. Therefore, only 92% of the project traffic was distributed (and included in the analysis). Therefore over 71 project trips are unaccounted for in the analysis. The traffic model shows most of

TABLE 3

STUDY AREA DETERMINATION

LINK NO.	ROADWAY	FROM	TO	SERVICE VOLUMES		PROJECT TRAFFIC			PROJECT TRAFFIC % OF SERVICE VOLUME	WITHIN STUDY NETWORK?[2]
				EXISTING LANEAGE	LOS D SERVICE VOLUME PEAK-HOUR DIRECTIONAL VOLUME	DIRECTION	PROJECT TRAFFIC ASSIGNMENT	PROJECT TRAFFIC VOLUME		
555	75th Avenue/Corey Causeway	Gulf Boulevard	Blind Pass Road	4	1,630	Eastbound	49%	234	14.40%	Yes
						Westbound	49%	180	11.00%	
		Blind Pass Road	Shore Drive South	4	1,630	Eastbound	43%	205	12.60%	Yes
						Westbound	43%	158	9.70%	
725	Gulf Boulevard	75th Avenue/Corey Causeway	Blind Pass Road	4	1,630	Northbound	48%	229	14.00%	Yes
						Southbound	48%	177	10.90%	
		Blind Pass Road	64th Avenue	4	1,630	Northbound	54%	258	15.80%	Yes
						Southbound	54%	199	12.20%	
		64th Avenue	Gulf Winds Drive	4	1,630	Northbound	55%	262	16.10%	Yes
						Southbound	55%	202	12.40%	
		Gulf Winds Drive	59th Avenue	4	1,630	Northbound	58%	277	17.00%	Yes
						Southbound	58%	213	13.10%	
		59th Avenue	Project Access	4	1,630	Northbound	63%	300	18.40%	Yes
						Southbound	63%	232	14.20%	
		Project Access	Pinellas Bayway	4	1,630	Northbound	29%	107	6.60%	Yes
						Southbound	29%	138	8.50%	
973	Pinellas Bayway	Gulf Boulevard	Sun Boulevard	4	1,630	Eastbound	25%	119	7.30%	Yes
						Westbound	25%	92	5.60%	
511	Blind Pass Road	W. Gulf Boulevard	75th Avenue/Corey Causeway	4	1,630	Northbound	10%	48	2.90%	Yes
						Southbound	10%	37	2.90%	
--		75th Avenue/Corey Causeway	Gulf Boulevard	2	1,000	Northbound	6%	29	2.90%	Yes
						Southbound	6%	22	2.20%	
--	Gulf Winds Drive/Boca Ciega Drive	75th Avenue/Corey Causeway	Gulf Boulevard	2	1,000	Northbound	3%	14	1.40%	Yes
						Southbound	3%	11	1.10%	

1. Estimated utilizing 2023 FDOT's Generalized Level of Service Volume Tables (2020*0.90*0.55 = 1000)
2. Roadway segments up to a maximum radius of two miles from the project site were considered in the study area determination.

these trips traveling from the project site to locations between the project site and 59th Avenue, a distance of approximately 500 feet, which is questionable given the land uses in that area and the short distance to drive in a vehicle versus alternative modes.

3. Pass-By Calculations are Inappropriate.

a. The trip generation estimate for the retail space used Land Use Code (LUC) 822 which is for a Strip Retail Plaza that is less than 40,000 square feet. The description of this LUC from ITE is attached to this letter. Since the retail land use inside of a resort hotel does not operate like a Strip Retail Plaza, as analyzed, and there are likely to be access and parking prohibitions or at least perceived prohibitions, it is questionable that traffic just passing by would utilize these retail spaces. Therefore, the use of any pass-by reductions in this situation is questionable.

b. Pass-by reductions in trip generation for the analysis is permitted for uses that attract traffic from the existing roadway traffic, but they do not create new trips. For example, many gas station trips are part of another trip and drivers typically stop at a gas station while on their way somewhere else (work or home, etc.). Since this is not a new trip on the road, additional traffic was not added to the road. The same applies to some retail uses. For the pass-by calculation associated with this retail development, a land use code (821) that is different than the land use code used for trip generation (822). While these LUCs are related they are separated for a reason – they are not the same. Also, the pass-by reduction percentage used from LUC 821 was 40%. However, for Saturdays, which is likely when the true peak hour occurs for this site, the pass-by reduction percentage is only 31%. Also, the pass-by reduction percentage for LUC 820 (the most common retail LUC) is only 29%.

4. The Trip Generation estimates use two different methods.

a. To establish the study network, ITE was used for the existing site trip generation estimates. However, for the impact analysis, it appears the driveway counts were used for existing trip generation estimates. If there are parts of the existing site that are currently not in operation, then the existing site may be currently generating fewer trips than when in full operation and therefore driveway counts would represent an inaccurately low trip generation. Using two methodologies to estimate existing trip generation is inconsistent. A singular, accurate, trip generation method should be used throughout the analysis, and in this case, it should be ITE.

5. Volumes used from other studies were incorrect.

a. Because traffic volumes were utilized from the Sirata Hotel traffic analysis directly, all of the previous comments submitted are applicable here (see the Alex Roark Engineering letter Re: Sirata Beach Resort Redevelopment traffic study review dated December 2, 2023).

b. The volumes on Gulf Boulevard from the TradeWinds to the Pinellas Bayway link from the Sirata Resort traffic analysis is wrong.

LINCKS & ASSOCIATES, INC.

TABLE 4

2029 BACKGROUND TRAFFIC

Link No.	Rdway	From	To	Direction	LOS DSV (1)	2022 Volume (1)	2023 Volume (2)	2029 Volume (3)	Miramar and Corey Landing	Sirata Resort	2029 Total
555	75th Ave/ Corey Cswy	Gulf Blvd	Blind Pass Rd	EB	1,630	1,126	1,151	1,269	16	33	1,338
				WB	1,630	1,126	1,151	1,269	16	41	1,346
		Blind Pass Blvd	Shore Dr South	EB	1,630	1,126	1,151	1,269	68	29	1,366
				WB	1,630	1,126	1,151	1,269	68	36	1,393
725	Gulf Blvd	75th Ave/Corey Cswy	Blind Pass Rd	NB	1,630	-	927	1,036	20	33	1,091
				SB	1,630	-	880	986	20	40	1,046
		Blind Pass Rd	64th Ave	NB	1,630	-	977	1,094	30	37	1,161
				SB	1,630	-	920	1,030	30	45	1,105
		64th Ave	Gulf Winds Dr	NB	1,630	-	964	1,080	28	37	1,145
				SB	1,630	-	944	1,057	28	46	1,131
		Gulf Winds Dr	59th Ave	NB	1,630	-	1,062	1,190	26	39	1,255
				SB	1,630	-	1,046	1,174	26	49	1,249
		59th Ave	Tradewinds	NB	1,630	-	1,046	1,174	30	43	1,247
				SB	1,630	-	1,060	1,187	30	53	1,270
		Tradewinds	Pinellas Bayway	NB	1,630	-	987	1,105	30	24	1,159
				SB	1,630	-	836	936	30	20	986
973	Pinellas Bayway	Gulf Boulevard	Sun Blvd	EB	1,630	1,126	1,148	1,286	18	17	1,321
				WB	1,630	1,126	1,148	1,286	18	21	1,325
511	Blind Pass Rd	W. Gulf Blvd	75th Ave/Corey Cswy	WB	1,630	813	829	926	17	7	952
				SB	1,630	813	829	926	17	6	953
		75th Ave/Corey Cswy	Gulf Blvd	NB	1,630	813	829	926	17	4	949
				SB	1,630	813	829	926	11	6	944
-	Gulfwind Dr/ Boca Ciega Dr	75th Ave/Corey Cswy	Gulf Blvd	NB	1,630	-	97	106	17	2	127
				SB	1,630	-	96	116	26	3	145

(1) Source: Forward Pinellas 2023 Annual Level of Service Report.
(2) 2% per year growth rate except Gulf Boulevard volumes - based on 2023 counts.

When selecting a volume from a roadway link with multiple segments, the highest volume should be selected. Notwithstanding the other errors from the Sirata Resort traffic analysis itself, the volumes pulled from that report on that segment were 24 northbound and 20 southbound. However, it should be 48 northbound and 59 southbound since the segment just south of 55th

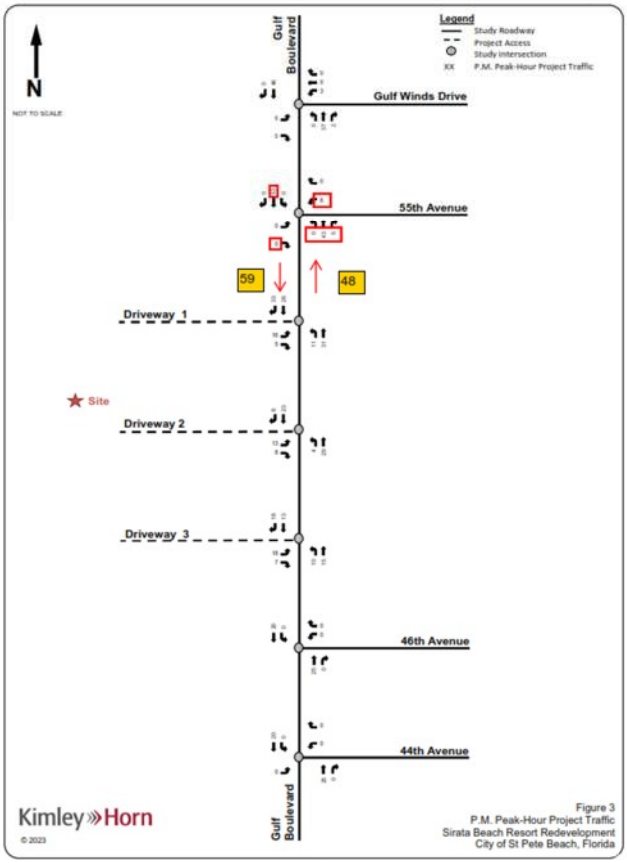

Figure 3
P.M. Peak-Hour Project Traffic
Sirata Beach Resort Redevelopment
City of St Pete Beach, Florida

Avenue has these volumes in the Sirata study.

6. The Trip Generation calculations do not match the Conceptual Site Plan.

a. The “Conceptual Site Plan with Uses” shows 650 “Hotel Keys”, however the trip generation in the transportation analysis only includes 629 hotel rooms.
b. The Conceptual Site Plan shows 37,640 square feet of “retail & restaurants”. Unless there are 19,853 square feet of restaurants, then the 17,787 square feet of retail included in the transportation analysis is inaccurate.

Based on this review, this Traffic Impact Analysis should be revised to accurately reflect an assessment of the transportation impacts associated with this proposed development. This review was not comprehensive but rather a summary of the larger issues. Further review may result in more issues in the details. Please let us know if you have any questions.

Sincerely,

Drew Roark, PE, CTL
Vice President

attachments

Land Use: 822
Strip Retail Plaza (<40k)

Description

A strip retail plaza is an integrated group of commercial establishments that is planned, developed, owned, and managed as a unit. Each study site in this land use has less than 40,000 square feet of gross leasable area (GLA). Because a strip retail plaza is open-air, the GLA is the same as the gross floor area of the building.

The 40,000 square feet GFA threshold between strip retail plaza and shopping plaza (Land Use 821) was selected based on an examination of the overall shopping center/plaza database. No shopping plaza with a supermarket as its anchor is smaller than 40,000 square feet GLA.

Shopping center (>150k) (Land use 820), shopping plaza (40-150k) (Land Use 821), and factory outlet center (Land Use 823) are related uses.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (https://www.ite.org/technical-resources/topics/trip-and-parking-generation/).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, Delaware, Florida, New Jersey, Ontario (CAN), South Dakota, Vermont, Washington, and Wisconsin.

Source Numbers

304, 358, 423, 428, 437, 507, 715, 728, 936, 960, 961, 974, 1009