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TRAFFIC ENGINEERING  
TRANSPORTATION PLANNING  
SIGNAL SYSTEMS/DESIGN

## MEMORANDUM

TO: Mr. John Wojdak, P.E.  
RESPEC

FROM: Ted B. Treesh  
President

DATE: February 9, 2026

RE: Gulf Coast Health Park CPD Administrative Amendment  
Lee County, Florida

TR Transportation Consultants, Inc. has completed a trip generation comparison for the proposed Administrative Amendment application for the Gulf Coast Health Park CPD. The site is governed by Zoning Resolution Z-11-018 which was approved for various Retail, Medical Office, Hotel and Multi-Family uses. This Administrative Amendment would reduce the retail floor area, eliminate medical office floor area as well as reduce the number of multi-family dwelling units. The number of hotel rooms currently permitted will remain unchanged. The following analysis illustrates the proposed change will result in a net DECREASE in trip generation of the site and result in a REDUCTION on the adjacent transportation facilities. Thus, the criteria outlined in the Lee County Land Development Code to permit this change administratively are indeed satisfied.

**Table 1** illustrates the uses that are currently approved in the CPD based on the approved Zoning Resolution Z-11-018 and the uses that are proposed with this Administrative Amendment. The original Zoning Resolution Z-11-018 identified the approved uses as 160,000 square feet of commercial uses, of which no more than 60,000 square feet can be retail uses, 130 hotel rooms and 125 multi-family dwelling units, that can be converted to assisted living and independent living units as provided in the Land Development Code. The remaining commercial floor area can be commercial office or medical office based on the Schedule of Uses. For the “worst case” trip generation, it was assumed the remaining commercial floor area was Medical Office.

**Table 1**  
**Land Uses**  
**Gulf Coast Health Park CPD**

| Land Use       | Approved Under Z-11-018 | Proposed          |
|----------------|-------------------------|-------------------|
| Retail         | 60,000 Sq. Ft.          | 50,000 Sq. Ft.    |
| Medical Office | 100,000 Sq. Ft.         | 0                 |
| Hotel          | 130 Rooms               | 130 Rooms         |
| Multi-Family   | 125 Dwelling Units      | 88 Dwelling Units |

**Table 2** illustrates the weekday peak hour and daily trip generation of the uses approved under the originally approved zoning **Resolution Z-11-018**. **Table 3** illustrates the trip generation of the uses as proposed under the Administrative Amendment. **Table 4** then illustrates the trip reduction that will occur as a result of the Amendment. The trip generation was based on land use data from the Institute of Transportation Engineer's **Trip Generation Report**, 12<sup>th</sup> Edition utilizing Land Use Code 821 for the retail uses, Land Use Code 720 for the Medical Office uses, Land Use Code 310 for the hotel use and Land Use Code 220 for the multi-family uses. Copies of the trip generation pages are attached to this memo for reference.

**Table 2**  
**Trip Generation – Approved Uses Per Z-11-018**  
**Gulf Coast Health Park CPD**

| Land Use                    | Weekday A.M. Peak Hour |            |            | Weekday P.M. Peak Hour |            |            | Daily (2-way) |
|-----------------------------|------------------------|------------|------------|------------------------|------------|------------|---------------|
|                             | In                     | Out        | Total      | In                     | Out        | Total      |               |
| Retail<br>(LUC 821)         | 59                     | 36         | 95         | 140                    | 146        | 286        | 3,923         |
| Medical Office<br>(LUC 720) | 186                    | 53         | 239        | 109                    | 255        | 364        | 3,985         |
| Hotel<br>(LUC 310)          | 24                     | 21         | 45         | 28                     | 27         | 55         | 759           |
| Multi-Family<br>(LUC 220)   | 14                     | 43         | 57         | 42                     | 25         | 67         | 824           |
| <b>Total</b>                | <b>283</b>             | <b>153</b> | <b>436</b> | <b>319</b>             | <b>453</b> | <b>772</b> | <b>9,491</b>  |

**Table 3**  
**Trip Generation – Proposed with Current ADD**  
**Gulf Coast Health Park CPD**

| Land Use                  | Weekday A.M. Peak Hour |           |            | Weekday P.M. Peak Hour |            |            | Daily<br>(2-way) |
|---------------------------|------------------------|-----------|------------|------------------------|------------|------------|------------------|
|                           | In                     | Out       | Total      | In                     | Out        | Total      |                  |
| Retail<br>(LUC 821)       | 49                     | 31        | 80         | 117                    | 121        | 238        | 3,269            |
| Hotel<br>(LUC 310)        | 24                     | 21        | 45         | 28                     | 27         | 55         | 759              |
| Multi-Family<br>(LUC 220) | 10                     | 34        | 44         | 31                     | 19         | 50         | 616              |
| <b>Total</b>              | <b>83</b>              | <b>86</b> | <b>169</b> | <b>176</b>             | <b>167</b> | <b>343</b> | <b>4,644</b>     |

**Table 4**  
**Trip Generation Comparing Approved Zoning to Current ADD Request**  
**Gulf Coast Health Park CPD**

| Land Use                      | Weekday A.M. Peak Hour |            |             | Weekday P.M. Peak Hour |             |             | Daily<br>(2-way) |
|-------------------------------|------------------------|------------|-------------|------------------------|-------------|-------------|------------------|
|                               | In                     | Out        | Total       | In                     | Out         | Total       |                  |
| Proposed Request<br>(W/ADD)   | 83                     | 86         | 169         | 176                    | 167         | 343         | 4,644            |
| Approved Zoning<br>(Z-11-018) | -283                   | -153       | -436        | -319                   | -453        | -772        | -9,491           |
| <b>Trip Difference</b>        | <b>-200</b>            | <b>-67</b> | <b>-267</b> | <b>-143</b>            | <b>-286</b> | <b>-429</b> | <b>-4,847</b>    |

A Negative Number represents a DECREASE in trips and a Positive number represents an INCREASE in trips due to Current ADD Request

The proposed ADD reduces the weekday peak hours and daily trips from the originally approved CPD as result of the change in uses and will not have a significant impact on the surrounding roadway network than what was originally analyzed in the zoning approval.

Attachments

# Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 28

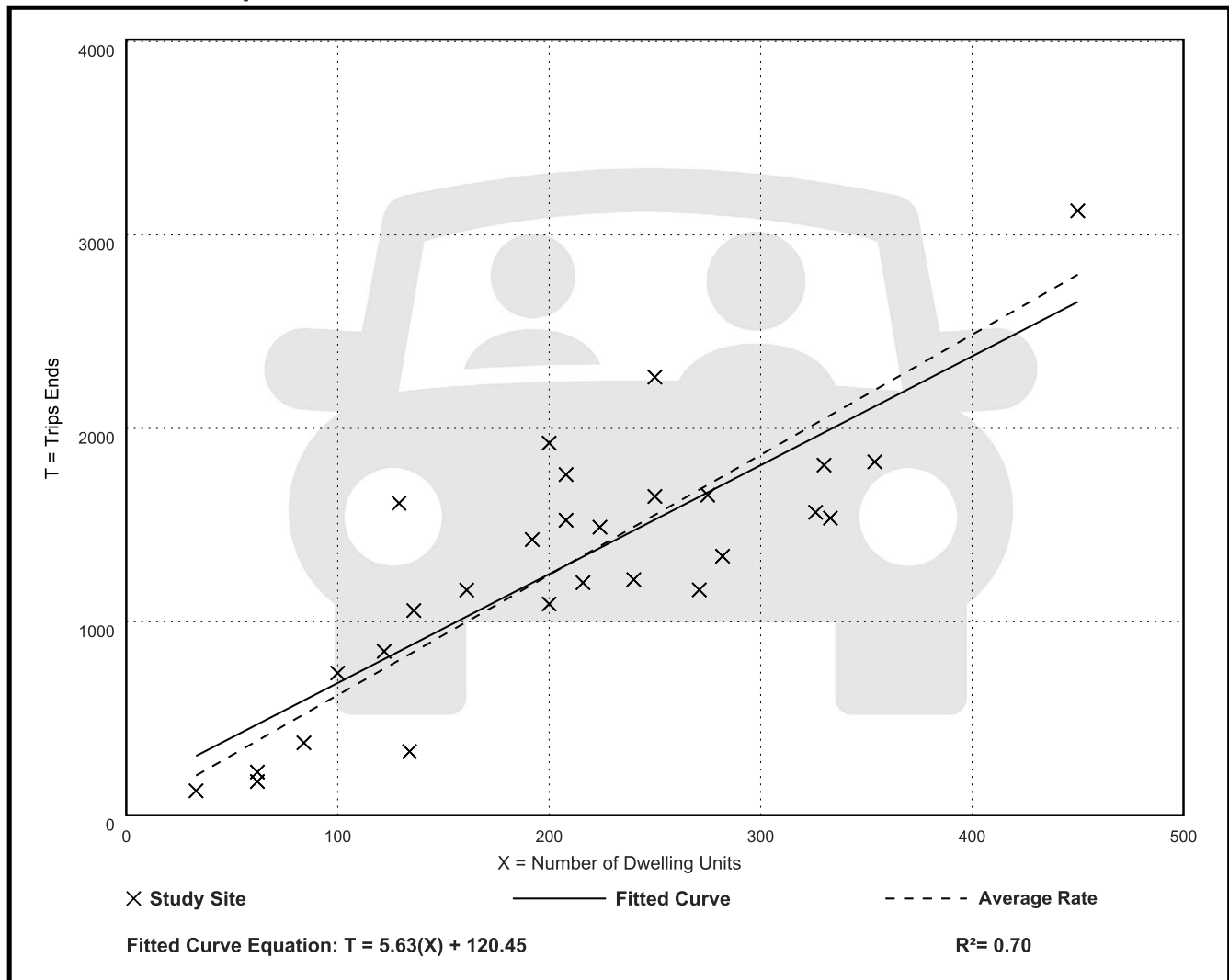
Avg. Num. of Dwelling Units: 208

Directional Distribution: 50% entering, 50% exiting

## Vehicle Trip Generation per Dwelling Unit

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 6.21         | 2.46 - 12.50   | 1.87               |

## Data Plot and Equation



# Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 51

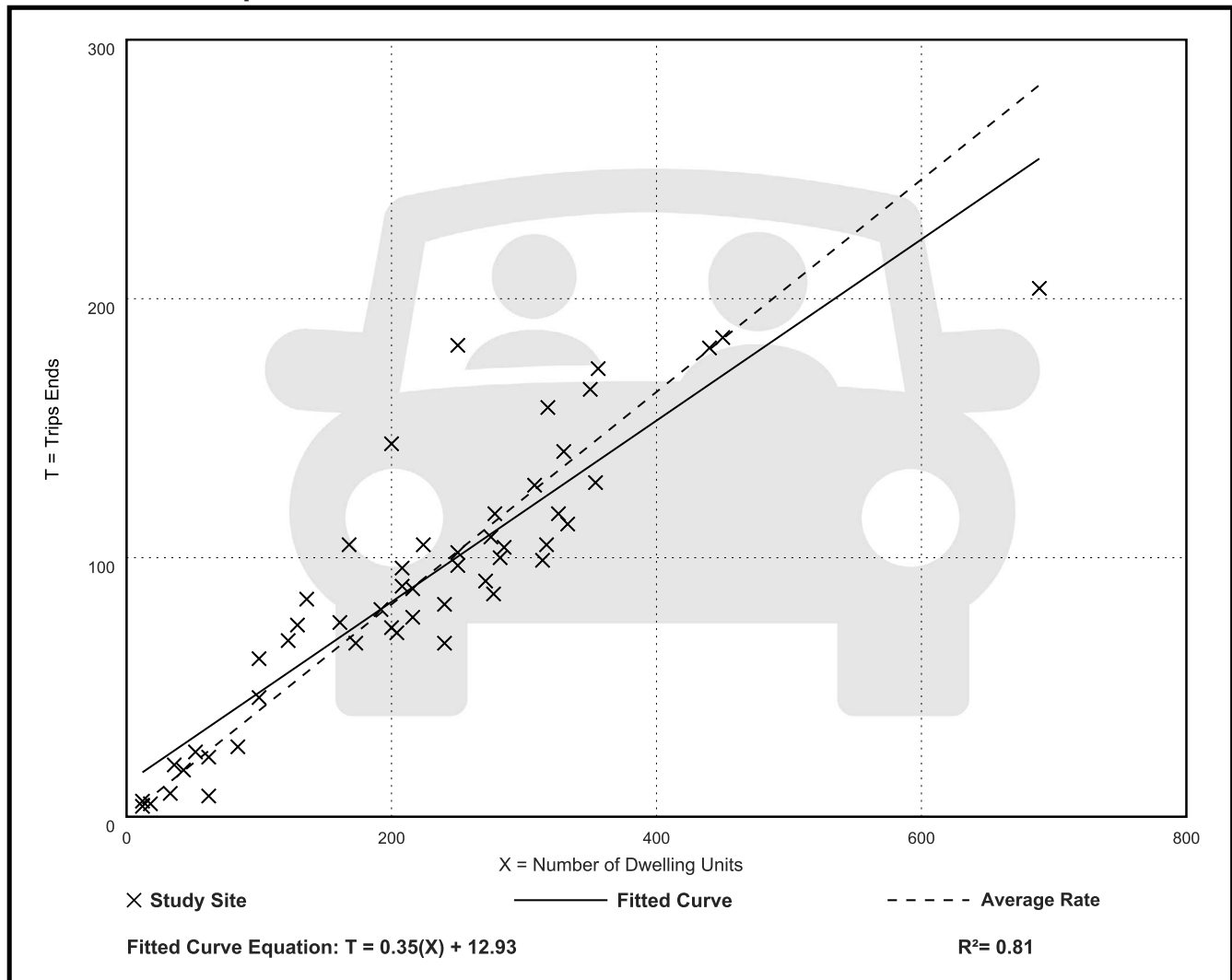
Avg. Num. of Dwelling Units: 219

Directional Distribution: 24% entering, 76% exiting

## Vehicle Trip Generation per Dwelling Unit

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 0.41         | 0.13 - 0.73    | 0.10               |

## Data Plot and Equation



# Multifamily Housing (Low-Rise) Not Close to Rail Transit (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 61

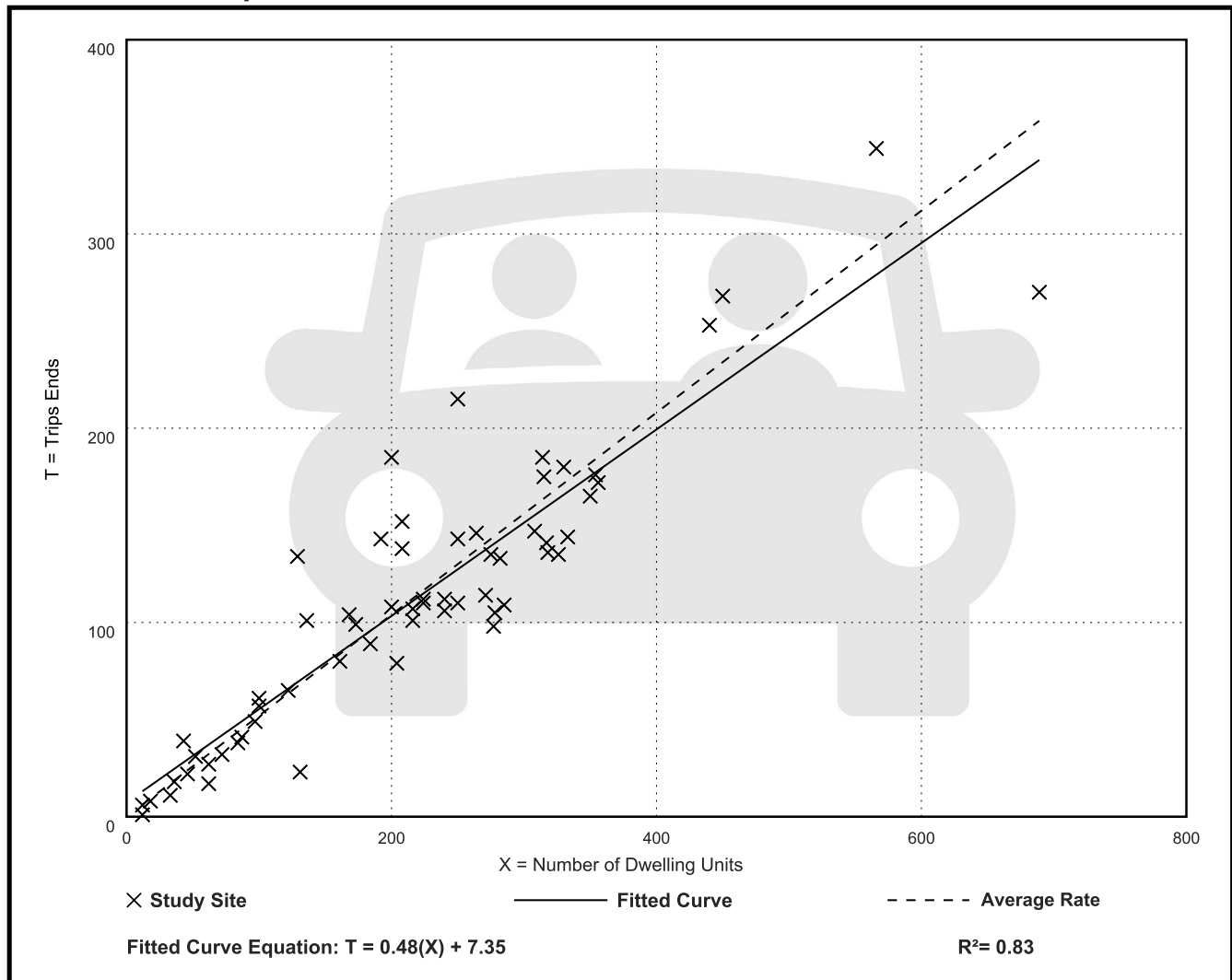
Avg. Num. of Dwelling Units: 215

Directional Distribution: 62% entering, 38% exiting

## Vehicle Trip Generation per Dwelling Unit

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 0.52         | 0.08 - 1.04    | 0.13               |

## Data Plot and Equation



# Shopping Plaza (40-150k) - Supermarket - No (821)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 6

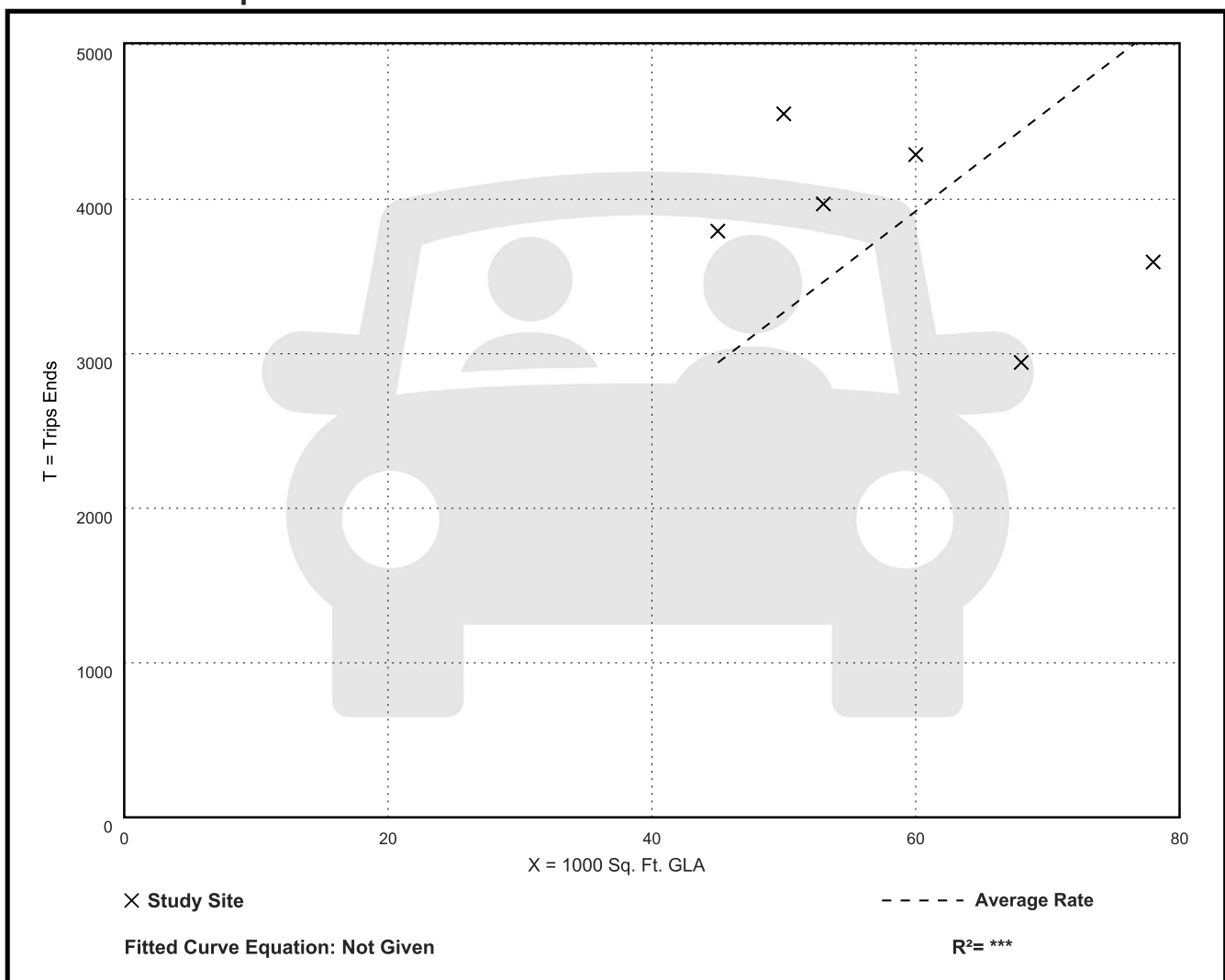
Avg. 1000 Sq. Ft. GLA: 59

Directional Distribution: 50% entering, 50% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GLA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 65.38        | 43.29 - 91.06  | 20.03              |

## Data Plot and Equation



# Shopping Plaza (40-150k) - Supermarket - No (821)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 9

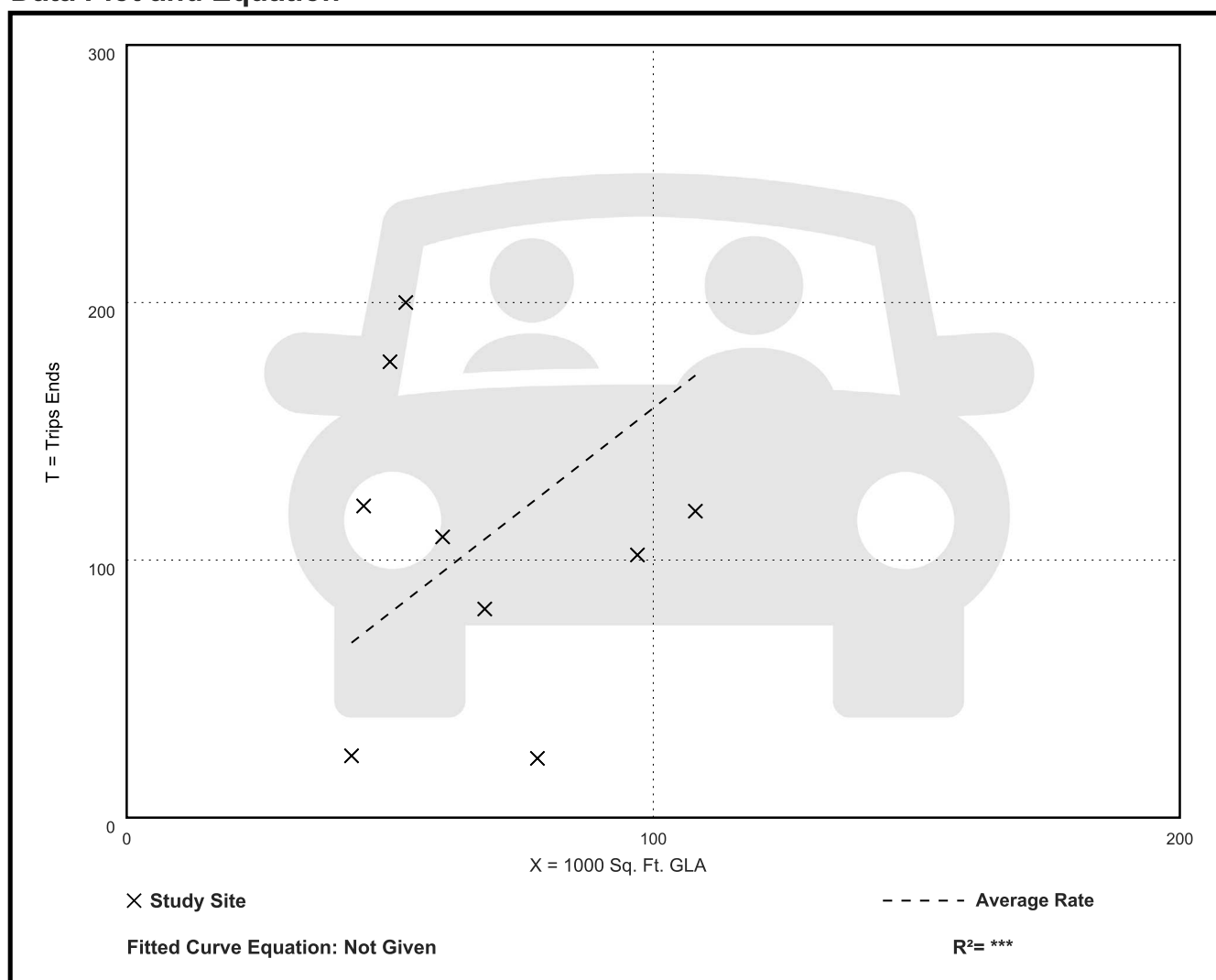
Avg. 1000 Sq. Ft. GLA: 67

Directional Distribution: 62% entering, 38% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GLA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 1.59         | 0.29 - 3.77    | 1.18               |

## Data Plot and Equation



# Shopping Plaza (40-150k) - Supermarket - No (821)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 24

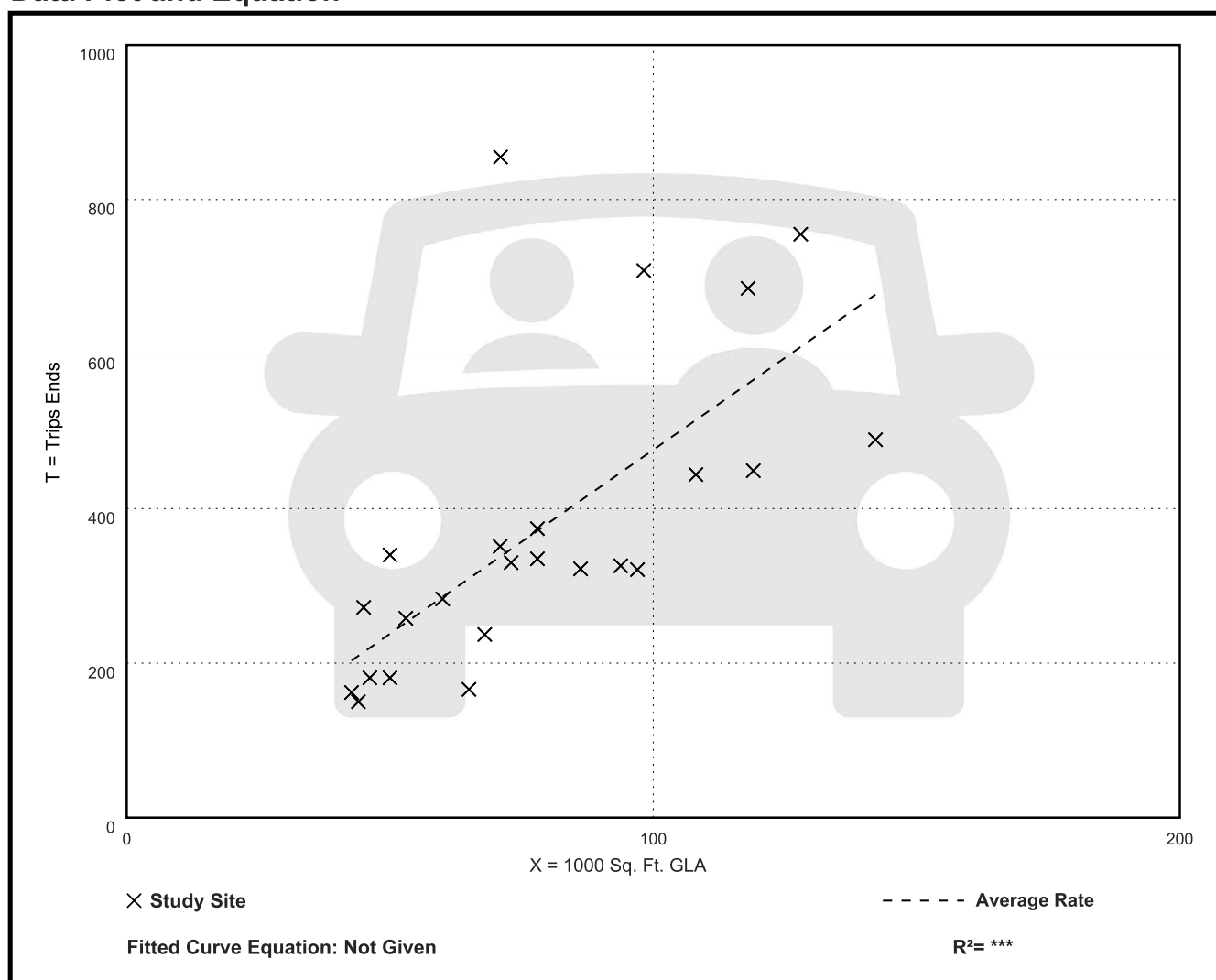
Avg. 1000 Sq. Ft. GLA: 79

Directional Distribution: 49% entering, 51% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GLA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 4.76         | 2.55 - 12.04   | 1.89               |

## Data Plot and Equation



# Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 16

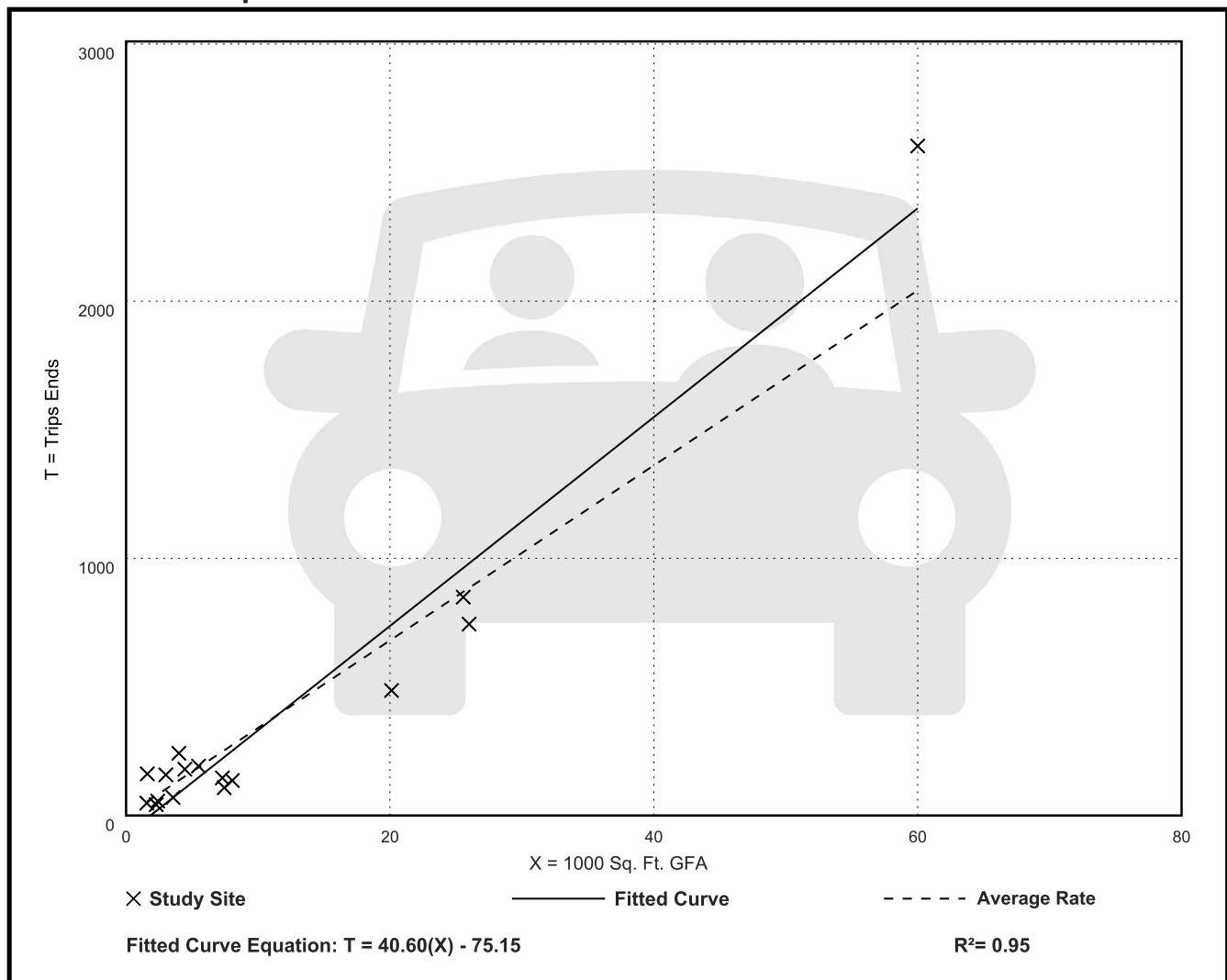
Avg. 1000 Sq. Ft. GFA: 11

Directional Distribution: 50% entering, 50% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GFA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 34.03        | 14.52 - 100.75 | 12.64              |

## Data Plot and Equation



# Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 20

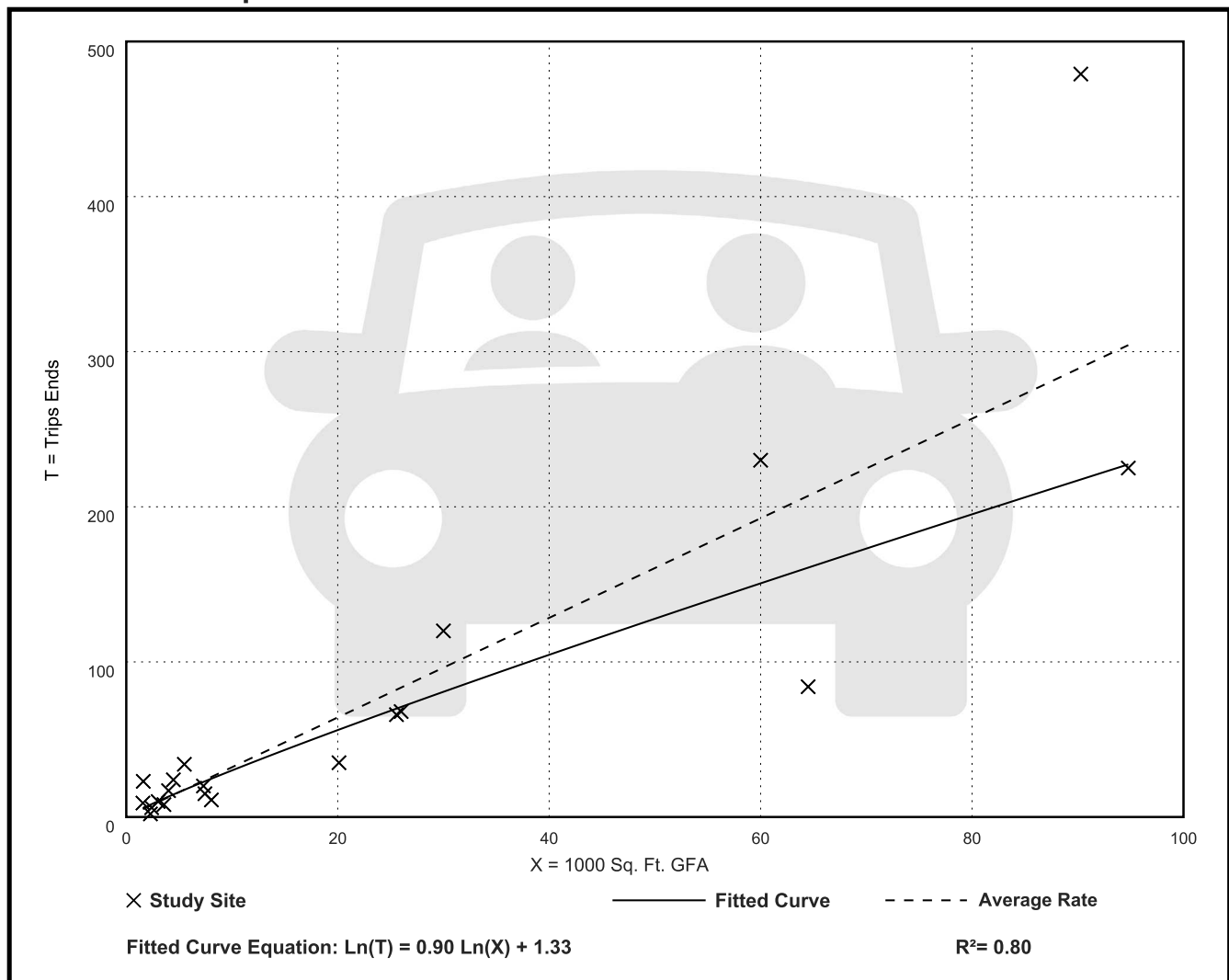
Avg. 1000 Sq. Ft. GFA: 23

Directional Distribution: 78% entering, 22% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GFA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 3.21         | 0.87 - 14.30   | 1.61               |

## Data Plot and Equation



# Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 26

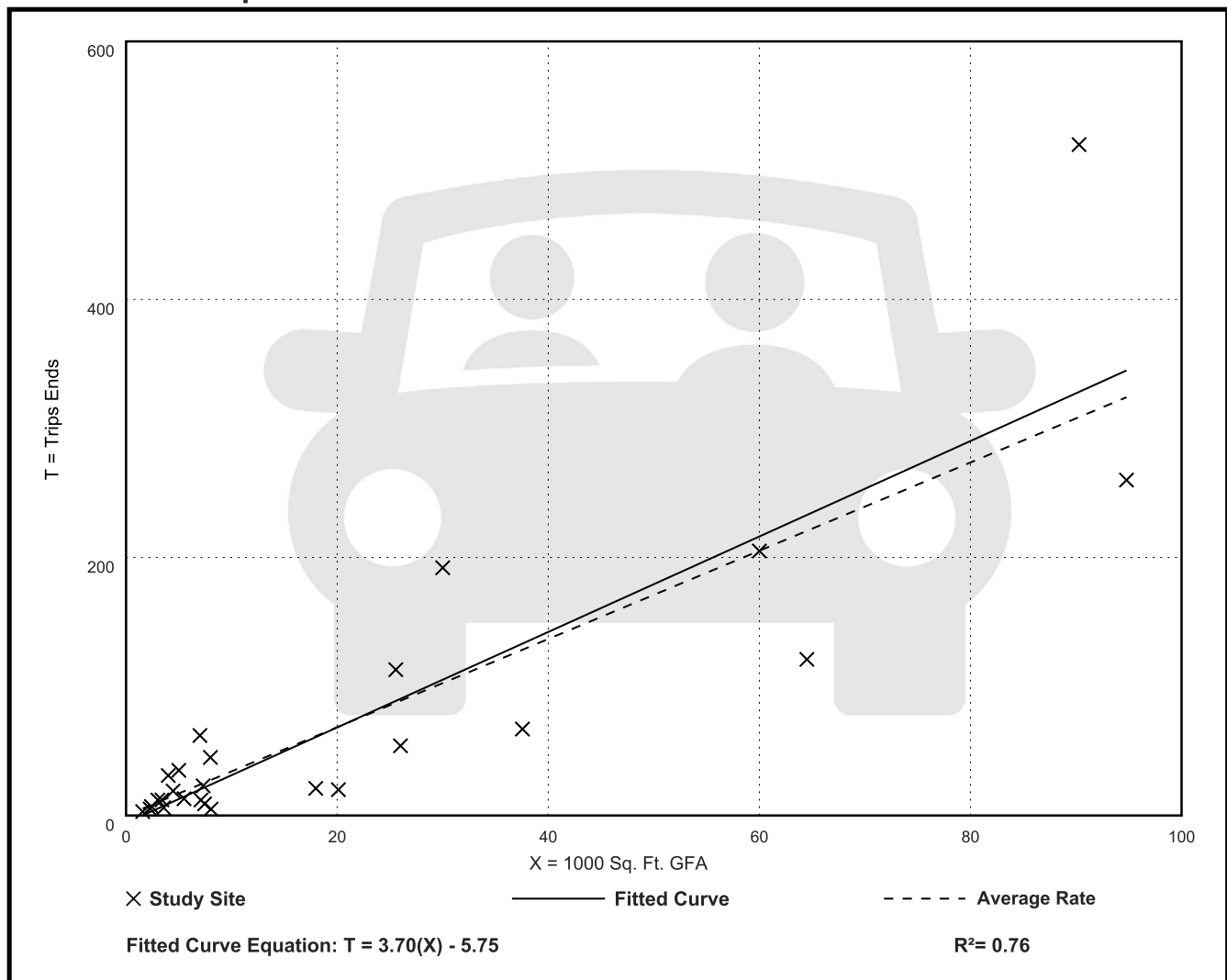
Avg. 1000 Sq. Ft. GFA: 21

Directional Distribution: 30% entering, 70% exiting

## Vehicle Trip Generation per 1000 Sq. Ft. GFA

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 3.42         | 0.62 - 8.86    | 1.89               |

## Data Plot and Equation



# Hotel (310)

**Vehicle Trip Ends vs: Rooms**  
**On a: Weekday**

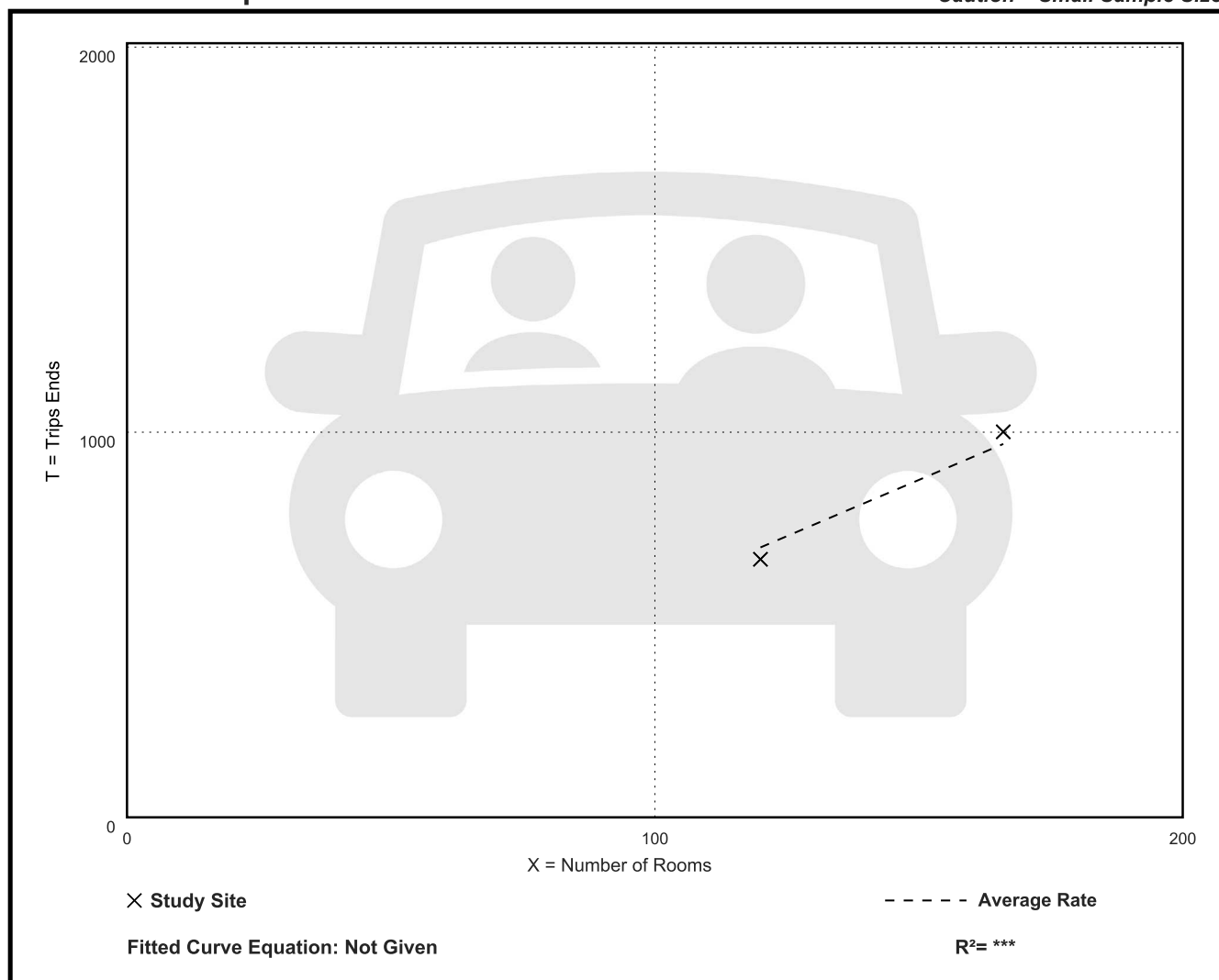
**Setting/Location: General Urban/Suburban**  
Number of Studies: 2  
Avg. Num. of Rooms: 143  
Directional Distribution: 50% entering, 50% exiting

## Vehicle Trip Generation per Room

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 5.84         | 5.58 - 6.03    | ***                |

## Data Plot and Equation

*Caution – Small Sample Size*



# Hotel (310)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 17

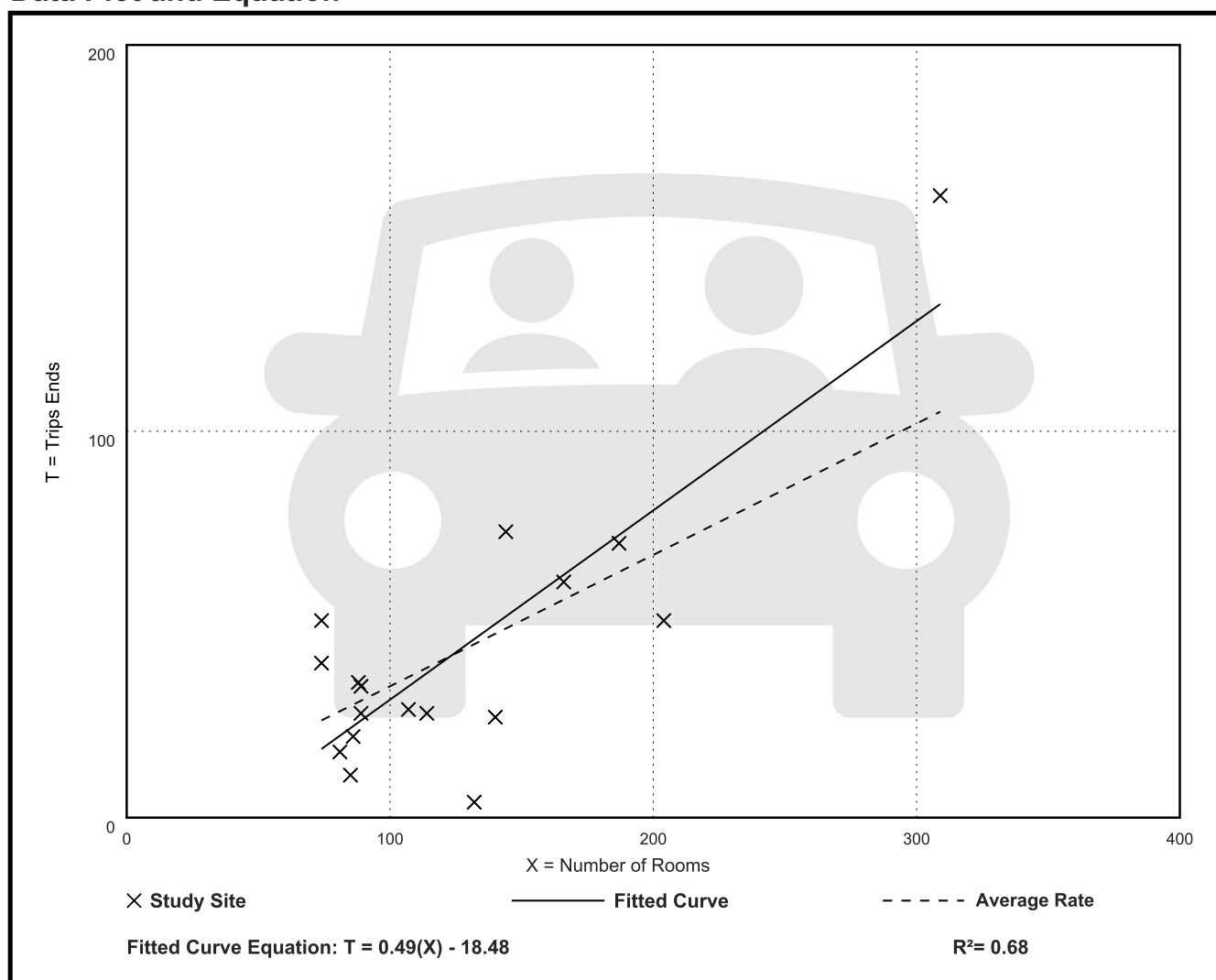
Avg. Num. of Rooms: 128

Directional Distribution: 52% entering, 48% exiting

## Vehicle Trip Generation per Room

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 0.34         | 0.03 - 0.69    | 0.16               |

## Data Plot and Equation



# Hotel (310)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 20

Avg. Num. of Rooms: 142

Directional Distribution: 51% entering, 49% exiting

## Vehicle Trip Generation per Room

| Average Rate | Range of Rates | Standard Deviation |
|--------------|----------------|--------------------|
| 0.47         | 0.11 - 1.06    | 0.28               |

## Data Plot and Equation

