

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
FOR SARASOTA COUNTY, FLORIDA**

LOURDES RAMIREZ
Plaintiff

CASE NO.:
DIVISION:

v.

SARASOTA COUNTY
Defendant

COMPLAINT

Plaintiff Lourdes Ramirez sues Defendant Sarasota County and states:

JURISDICTION AND VENUE

1. This action is brought under section 163.3215(3), Florida Statutes (2021), which provides that aggrieved or adversely affected parties may maintain a *de novo* action for declaratory, injunctive, or other relief against a local government, challenging the local government's decision to grant or deny an application for a development order, as defined in section 163.3164, Florida Statutes, that materially alters the use or density or intensity of use on a particular piece of property in a manner that is not consistent with the local government's comprehensive plan.
2. Plaintiff brings this action to challenge a Development Order that Sarasota County Board of County Commissioners granted on October 27, 2021 in the form of *Resolution No. 2021-208 of the Board of County Commissioners of Sarasota County, Florida Special Exception No. 1824* (the Development Order). A copy of the Development Order is attached to this Complaint as Exhibit A.
3. This Court has jurisdiction under Article V, s. 5 of the Florida Constitution, and sections 26.012, 86.011, and 86.061, Florida Statutes.

4. The Development Order was filed with the Clerk of Circuit Court, and thus rendered, on October 27, 2021. This Complaint is timely filed no later than thirty days following rendition of the Development Order.
5. Venue is proper in Sarasota County under section 163.3215(5), Florida Statutes because the action giving rise to the cause of action occurred in Sarasota County.

THE PARTIES

6. Plaintiff Lourdes Ramirez (Ms. Ramirez) is an individual, property owner, and resident of the Siesta Key community in unincorporated Sarasota County.
7. Defendant Sarasota County is a political subdivision of the State of Florida.

PLAINTIFFS' STANDING

8. Ms. Ramirez resides at, and owns a beneficial and homestead interest in, residential property at 5131 Saint Albans Avenue, Sarasota, Florida.
9. Ms. Ramirez's residence is located approximately .65 mile from the parcel that is the subject of the Development Order (the Subject Property).
10. Both Ms. Ramirez's residential property and the Subject Property are located on Siesta Key, which is a low-lying barrier island located off the coast of Sarasota County, Florida.
11. In her regular daily routine, Ms. Ramirez walks or drives past the Subject Property almost each day in route through the Siesta Key Village and to the beach.
12. Ms. Ramirez owns and operates Siesta Key Community, Inc., a corporation she created in 2010 as a resource for Siesta Key residents and visitors.
13. The mission of Ms. Ramirez's entity, Siesta Key Community, Inc., is "to educate and to advocate for issues that impact the environment and the quality of life of residents and visitors of Siesta Key." (See: <https://www.siestakeycommunity.com/about-skc>)

14. The goals of Ms. Ramirez's entity, Siesta Key Community, Inc., include:

- Protection of Siesta Key's natural environment
- Protect Siesta Key neighborhoods from over-development
- Protect current Siesta Key Zoning Code
- Support local businesses and accommodations
- Provide information on Siesta Key events and businesses through social media

(See: <https://www.siestakeycommunity.com/about-skc>)

15. Both individually and through her corporate entity, Siesta Key Community, Inc., Ms. Ramirez has focused her time, work, energies, and financial resources to protect and preserve the quality of life for Siesta Key residents, businesses, and visitors, and she has long been a passionate and active advocate on issues related to density, illegal rentals, and other land use and environmental issues on Siesta Key.

16. The Development Order will allow the Subject Property to be developed as an eight-story, 80-foot-high, 170-room hotel with a restaurant, bar, retail shops and 223 parking spaces for hotel guests and the public.

17. Because Ms. Ramirez's residential property is located on a barrier island within near proximity to the Subject Property, she will experience adverse impacts from the intensity, density, and use of the Subject Property allowed by the Development Order.

18. The adverse impacts Ms. Ramirez will experience because of the intensity, density, and use of the Subject Property allowed by the Development Order include the following: additional risk to her health and safety as a pedestrian and vehicle driver due to increased traffic and congestion on local roadways; delays due to increased traffic congestion on local roads; emergency evacuation route delays due to increased traffic congestion; delays of emergency responders due to increased traffic congestion; congestion and overcrowding of beaches, beach

parking, and public beach access points; congestion and overcrowding of public restroom facilities serving local beaches.

19. Roadways on Siesta Key are already operating at constrained levels of service. For example, the Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter, at Table 10-4 on pages V2-414 – 417 shows several roadways on Siesta Key are designated “constrained,” meaning the designated roadways are operating at a Level of Service “D” or “F,” and there are no potential improvements to provide better operating conditions.
20. The Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter at page V2-403 explains Level of Service “D” means “Speed and freedom to maneuver are severely restricted, and a poor level of comfort and convenience is experienced by the motorist. Small increases in traffic will generally cause operational problems at this level.”
21. The Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter at page V2-403 explains Level of Service “F” means

Operating conditions at this level are forced or have broken down. This condition exists wherever the amount of traffic approaching a point exceeds the amount that can traverse the point. Queues typically form at such locations. Operations are characterized by stop and go waves; vehicles may proceed at reasonable speeds for short distances, and then be required to stop in a cyclical fashion. Comfort and convenience are extremely poor, and frustration is high...

22. The Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter at page V2-404 states “Constrained county roadways are defined as exhibiting a level of service lower than the adopted standard and not being able to attain the adopted standard because prohibitive costs or environmental limitations prevent the construction of at least two additional through lanes.”
23. The Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter at page V2-404 explains Sarasota County’s “acceptance of constrained...roadways... presumes

an additional responsibility on the part of the county in its review and approval of development orders: to base such decisions on maintaining the existing level of service of such roadways and to not allow the existing operating conditions to be degraded.”

24. The Sarasota County Comprehensive Plan Mobility Element, Data and Analysis chapter, at Table 10-4 identifies segments of the following roadways on Siesta Key among those designated as “constrained” roadways: Higel Avenue; Siesta Drive; and Stickney Point Road.
25. Siesta Drive and Stickney Point Road, segments of which are constrained roadways, provide bridges from Siesta Key to the mainland and are designated Evacuation Routes.
26. Ms. Ramirez has standing to bring this action because the proximity of her Siesta Key residential property to the Subject Property, and her daily life routine and advocacy work focus on Siesta Key, expose her to adverse impacts that exceed in degree the general interest in community good shared by all persons of Sarasota County.
27. Ms. Ramirez is an “aggrieved or adversely affected party” as defined by section 163.3215(2), Florida Statutes, because as a result of the Development Order that Sarasota County approved, she will suffer adverse effects to her interests protected or furthered by the Sarasota County Comprehensive Plan (the Comprehensive Plan), including interests related to health and safety, police and fire protection service systems, densities or intensities of development, transportation facilities, and environmental resources.

THE SUBJECT PROPERTY

28. The Subject Property consists of approximately 0.96 acres located at 214, 220, and 226 Calle Miramar, and 221 Beach Road on Siesta Key in unincorporated Sarasota County, and more particularly described in the Development Order as “Lots 1, 2, 3, 4, 5, 27, and 28, Sarasota

Beach, as per plat thereof recorded in Plat Book 1, Page 76, of the Public Records of Sarasota County, Florida.”

29. The Subject Property is designated “Commercial-General/Siesta Key Overlay District” (CG/SKOD) on the Sarasota County Zoning Map.

30. The Subject Property is designated “Barrier Island” on the Sarasota County Comprehensive Plan Future Land Use Map.

31. The Sarasota Comprehensive Plan, Land Use Element, Data and Analysis chapter, at pages V2-320 – 321, states Barrier Islands are recognized as a unique land use category and explains

Development on the Barrier Islands is of special concern due to problems associated with hurricane evacuation, potential for storm damage, and the sensitive nature of coastal habitats...

On the Future Land Use Map, the Barrier Islands are represented as a homogenous land use classification to underscore the special considerations attendant to any future development or redevelopment. The future distribution, extent and location of generalized land uses are not portrayed for the Barrier Islands, because **it is the continued policy of Sarasota County that the intensity and density of future development not exceed that allowed by existing zoning.** Thus, future land uses on the Barrier Islands will remain essentially the same as the land uses shown on the “Existing Land Use Map – Sarasota County, 2015” (Map 7-2) (Emphasis added).

Concern for the future development and redevelopment of the Barrier Islands warrants special consideration, which necessitates treating the Barrier Islands differently than the urban areas...

32. Siesta Key is a low-lying barrier island, with vehicle access only by bridge, which creates special concern regarding hurricane evacuation, storm surge, fragile coastal habitats, and increased coastal erosion.

33. The Subject Property is within a designated Coastal High Hazard Area.

34. The Sarasota Comprehensive Plan, Land Use Element, Data and Analysis chapter, at page V2-321, states “The definition of Coastal High Hazard Areas is coincident with the evacuation zone for a Category 1 hurricane...”
35. The Subject Property, along with all of Siesta Key, is within a designated Evacuation Level A on the Sarasota County Evacuation Map. Residents in Evacuation Level A are the first to be evacuated for a category 1 hurricane.

THE DEVELOPMENT ORDER

36. After a local government adopts a comprehensive plan in conformity with the Community Planning Act, section 163.3161 *et seq.*, Florida Statutes, all actions taken by the local government in regard to development orders shall be consistent with the comprehensive plan. § 163.3194(1)(a), Fla. Stat.
37. A development order shall be consistent with the comprehensive plan if the land uses, densities or intensities, and other aspects of development permitted by the development order are compatible with and further the objectives, policies, land uses, and densities or intensities in the comprehensive plan and if it meets all other criteria enumerated by the local government. § 163.3194(3)(a), Fla. Stat.
38. The term “intensity” means "an objective measurement of the extent to which land may be developed or used, including the consumption or use of the space above, on, or below ground; the measurement of the use of or demand on natural resources; and the measurement of the use of or demand on facilities and services.” § 163.3164(22), Fla. Stat.
39. The term “density” means “an objective measurement of the number of people or residential units allowed per unit of land, such as residents or employees per acre.” § 163.3164(12), Fla. Stat.

40. A “development order” means “any order granting, denying, or granting with conditions an application for a development permit.” § 163.3164(15), Fla. Stat.
41. A “development permit” means “any building permit, zoning permit, subdivision approval, rezoning, certification, special exception, variance, or any other official action of local government having the effect of permitting the development of land.” § 163.3164(16), Fla. Stat.
42. In this case, the Development Order is a “development order” as defined at section 163.3164(15), Florida Statutes, in the form of a “special exception” that allows the Subject Property to be developed with “transient accommodations” consisting of an eight-story, 80-foot-high, 170-room hotel with a restaurant/bar, retail shops, and 223 parking spaces.
43. The Development Order will allow approximately 125,000 square feet of development on the Subject Property, which constitutes an intense land use with a floor-area-ratio equivalent to approximately three feet of floor area to each one foot of land area.
44. The Development Order materially alters the use and intensity and density of use on the Subject Property in a manner that is not consistent with the Sarasota County Comprehensive Plan (the Comprehensive Plan) because the land uses, intensities, densities, and other aspects of development permitted by the Development Order are not compatible with and do not further the objectives, policies, land uses, and densities or intensities in the Comprehensive Plan and do not meet all other criteria enumerated by Sarasota County.
45. The Comprehensive Plan Future Land Use Policy 1.2.6 requires Sarasota County to “discourage the intensification of land uses within Hurricane Evacuation Zones A and B...consistent with Future Land Use Policy 2.9.1, and Coastal Objective 1.2 and Policies 1.2.1 – 1.2.5.”

46. The land uses, intensities, densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Future Land Use Policy 1.2.6 because the Development Order allows a significant intensification of land use on the Subject Property within Hurricane Evacuation Zone A.
47. The Comprehensive Plan Future Land Use Policy 2.9.1 provides “Barrier Islands are designated on the Future Land Use Map to recognize existing land use patterns and to provide a basis for hurricane evacuation planning and disaster mitigation efforts. The intensity and density of future development on the Barrier Islands of Sarasota shall not exceed that allowed by zoning ordinances and regulations existing as of March 13, 1989.”
48. The Comprehensive Plan Future Land Use Policy 2.9.1 clearly and explicitly adopts the zoning ordinances and regulations existing as of March 13, 1989 as the limit of density and intensity of development on lands designated as Barrier Islands.
49. The Sarasota County zoning ordinances and regulations existing as of March 13, 1989 defined “Transient Accommodations” as
 - a dwelling unit or other accommodation used as a dwelling unit or other place of human habitation with sleeping accommodations...Transient accommodations shall include hotels, motels, inn, extended-stay facility, bed and breakfasts, boatels or other similar uses. A transient accommodation shall be considered a residential use for density purposes.
50. The Sarasota County zoning ordinances and regulations existing as of March 13, 1989 provided development standards for the CG zoning district that included a maximum density for “Transient Accommodations” of either 13 units per acre or 26 units per acre, depending on the percentage of units that included a kitchen.
51. The Development Order will materially increase the density and intensity of the Subject Property over that allowed by the Sarasota County zoning ordinances and regulations existing

as of March 13, 1989, because under those regulations the Subject Property could be developed as a hotel with a maximum of 25 transient residential units (26 units per acre x .96 acre size) and up to 25 parking spaces, whereas under the Development Order the Subject Property can be developed as an eight-story, 80-foot-high hotel with 170 rooms (transient residential units), a restaurant/bar, retail shops, and 223 public and private parking spaces.

52. The land uses, intensities, and densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Future Land Use Policy 2.9.1 because the Subject Property is on a Barrier Island, and the Development Order allows the Subject Property to be developed at a use, intensity, and density greater than that allowed by Sarasota County zoning ordinances and regulations existing as of March 13, 1989.
53. The Comprehensive Plan Housing Policy 1.5.6 requires Sarasota County to “ensure that the character and design of infill development promotes, enhances, and increases the vitality of existing neighborhoods.”
54. The land uses, intensities, densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Housing Policy 1.5.6 because the Development Order will allow an eight-story, 80-foot-high, 170-room hotel with a restaurant, bar, retail shops and 223 parking spaces for hotel guests and the public to be developed on the Subject Property adjacent to existing residential developments, which will result in negative impacts to and reduced vitality of the existing neighborhood.
55. The Comprehensive Plan Coastal Objective 1.1 requires Sarasota County to “limit public expenditures in the designated Coastal High-Hazard Area...to necessary public services and not to subsidize new development in this area.”

56. The Comprehensive Plan Coastal Objective 1.2 requires Sarasota County to “encourage low-density land uses in the Coastal High-Hazard Area...in order to direct population concentrations away from this area.”
57. The Comprehensive Plan Coastal Policy 1.2.1 requires that Sarasota County’s “Land Development Regulations and limits on urban infrastructure improvements shall both be used to limit development on coastal barrier islands and other high-hazard coastal areas to prevent a concentration of population or excessive expenditure of public and private funds.”
58. The Comprehensive Plan Coastal policy 1.2.3 requires Sarasota County to “encourage hotel/motel development in the storm evacuation zones category C, D, and E rather than evacuation zones A and B.”
59. The Comprehensive Plan Coastal Objective 1.3 requires Sarasota County “To protect the public safety during emergency evacuation by reducing or maintaining emergency evacuation clearance time; maintaining an adequate emergency evacuation roadway system; and ensuring adequate shelter space.”
60. The land uses, intensities, densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Coastal Objectives 1.1, 1.2, and 1.3, and Coastal Policies 1.2.1, 1.2.3 because the Subject Property is on a barrier island in Coastal High-Hazard Area and Evacuation Zone A, and the Development Order will allow an eight-story, 80-foot-high, 170-room hotel with a restaurant, bar, retail shops and 223 parking spaces for hotel guests and the public to be developed on the Subject Property, which does not limit development but will significantly increase the number of transient guests coming to Siesta Key, and will increase traffic on evacuation routes and the number of persons seeking emergency shelter during disaster events, and which will in turn

require an increase in public services and expenditures to meet the needs of the increased number of disaster evacuees.

61. The Comprehensive Plan Environment Policy 4.2.2 requires Sarasota County to “protect beaches, dunes, and coastal vegetation from vehicular traffic and pedestrian traffic by providing vehicular parking, and by managing pedestrian traffic.”
62. The Comprehensive Plan Environment Policy 4.2.3 requires Sarasota County to “encourage use of transit to access public beaches, bicycle use through the provision of bicycle paths and storage racks and planning for appropriate transit services.”
63. The land uses, intensities, densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Environment Policies 4.2.2 and 4.2.3 because the Development Order will allow an eight-story, 80-foot-high, 170-room hotel with a restaurant, bar, retail shops and 223 parking spaces for hotel guests and the public to be developed on the Subject Property, which will significantly increase the number of transient guests coming to Siesta Key and will result in potential traffic, parking, and pedestrian traffic management issues including direct impacts to beaches and dunes, and overcrowding at public beach access points.
64. The Comprehensive Plan Transportation Policy 1.1.4 requires Sarasota County to recognize the “interconnection between land use decisions and transportation needs and options” and “to work to ensure the transportation impacts are considered in land use decisions...”
65. The land uses, intensities, densities, and other aspects of the development permitted by the Development Order are not compatible with and do not further Comprehensive Plan Transportation Policy 1.1.4 because the Development Order will allow an eight-story, 80-foot-high, 170-room hotel with a restaurant, bar, retail shops and 223 parking spaces for hotel guests

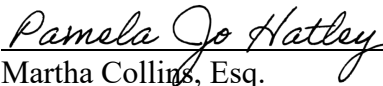
and the public to be developed on the Subject Property, which will bring transient guests and restaurant/bar/retail customers, which will result in potential traffic, parking, and pedestrian traffic management issues including direct impacts to beaches and dunes, overcrowding at public beach access points, potential cut-through traffic into residential neighborhoods, and increased potential for vehicle, pedestrian, and bicycle-related incidents.

66. Ms. Ramirez seeks judgment declaring the Development Order to be inconsistent with the Comprehensive Plan and enjoining any development activity pursuant to the Development Order.

67. Ms. Ramirez engaged attorney Martha Collins and Collins Law Group and is obligated to pay reasonable attorney's fees and costs related to this matter.

WHEREFORE, for all of the reasons above, Plaintiff Lourdes Ramirez demands judgment:

- A. Declaring the Development Order to be inconsistent with the Comprehensive Plan;
- B. Invalidating, quashing, revoking, and vacating the Development Order;
- C. Enjoining Defendant Sarasota County from permitting development activities pursuant to the Development Order;
- D. Awarding costs of this action and reasonable attorney's fees to Plaintiff; and
- E. Granting Plaintiff such other and further relief as the Court may deem just, proper, and necessary.



Martha Collins, Esq.
FBN: 167770
Collins Law Group
Pamela Jo Hatley, PhD, JD, FBN: 658545
Of Counsel to Collins Law Group
1110 N. Florida Ave., Tampa, FL 33602
Telephone: (813) 273-9166
mcollins@collins-lawgroup.com
pamela@landuse-appeals.com

EXHIBIT A

EXHIBIT A

RESOLUTION NO. 2021-208
OF THE BOARD OF COUNTY COMMISSIONERS
OF SARASOTA COUNTY, FLORIDA
SPECIAL EXCEPTION NO. 1824

WHEREAS, William W. Merrill, III, agent for the owner of the hereinafter described real property has filed Special Exception Petition No. 1824 requesting that a special exception be granted to permit 1) Transient Accommodations, and 2) Height increase to 80 feet (from 35 feet) on properties located north of Beach Road and east of Ocean Boulevard, at 214, 220, and 226 Calle Miramar and 221 Beach Road, Sarasota in the CG/SKOD (Commercial, General/Siesta Key Overlay District) zone district; and

WHEREAS, the Planning Commission of Sarasota County, after due public notice, did hold a public hearing on the nineteenth day of August 2021, to consider said Special Exception Petition No 1824, and

WHEREAS, the said Planning Commission did submit and report its findings and recommendations to this Board that said Special Exception Petition No. 1824 be granted, and

WHEREAS, this Board, after due public notice, did on the 27th day of October 2021, hold a public hearing to consider said special exception petition, the recommendation of the Planning Commission and all matters relevant to said petition.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Sarasota County, Florida, in public meeting assembled:

A. This Board, after having considered the report of the Planning Commission, the testimony of the applicant, evidence entered into the record, public comment on the petition and all things brought to its attention with regard to said Special Exception Petition No. 1824 does make the following findings:

1. The proposed use is consistent with the intent, goals, objectives, policies, guiding principles and programs of the Comprehensive Plan;
2. The proposed use is compatible with the existing land use pattern and designated future uses;
3. There are adequate public facilities available consistent with the level of service standards adopted in the Comprehensive Plan, and as defined and implemented through the Sarasota County Concurrency Management System Regulations, Chapter 94, Article VII of Exhibit A of the Sarasota County Code;
4. The proposed use, singularly or in combination with other special exceptions, will not be detrimental to the health, safety, morals, order, comfort, convenience, or appearance of the neighborhood or other adjacent uses by reason of any one or more of the following: the number, area, location, height, orientation, intensity or relation to the neighborhood or other adjacent uses;
5. The proposed use will be adequately buffered to effectively separate traffic, visual impact and noise from existing or intended nearby uses;
6. The subject parcel is adequate in shape and size to accommodate the proposed use;
7. The ingress and egress to the subject parcel and internal circulation will not adversely affect

traffic flow, safety or control.

8. The subject property is adequate to accommodate the height and mass of any proposed structure(s).

B. Special Exception Petition No. 1824 is hereby granted for the following described property, said property being in Sarasota County, Florida, to-wit:

Lots 1, 2, 3, 4, 5, 27 and 28, Block 17, Sarasota Beach, as per plat thereof recorded in Plat Book 1, Page 76, of the Public Records of Sarasota County, Florida.

and the same is hereby approved for Special Exception Petition No. 1824, subject to the stipulations as set forth below. As used in the stipulations hereinafter set forth, the term "Owner" shall refer to the owner or owners of the property described in Section B and their successors and assigns. Upon recording in the public records of Sarasota County, these stipulations shall be covenants running with the land.

1. Development shall take place in substantial accordance with the Development Concept Plan, dated April 30, 2021, and attached hereto as Exhibit "A." This does not imply or confer any variances from applicable County regulations.
2. Prior to site and development approval and demolition of any structure on the Property, the two 1925 structures located at 214 Calle Miramar (PID # 0080-24-0015) and the two 1948 structures located at 220 and 226 Calle Miramar (PID #'s 0080-24-0013 and 0080-24-0014) shall be recorded on the Florida Master Site File (FMSF), and the FMSF for the recorded structure at 221 Beach Rd (PID# 0080-24-0020) shall be updated. All of these structures may be part of the Miramar development, one of the earliest developments on Siesta Key.

C. This Resolution shall take effect immediately upon the effective date of Ordinance 2021-047, including final resolution of any appeals.

PASSED AND DULY ADOPTED this 27th day of October, 2021.

BOARD OF COUNTY COMMISSIONERS OF
SARASOTA COUNTY, FLORIDA

By: _____

Chairman

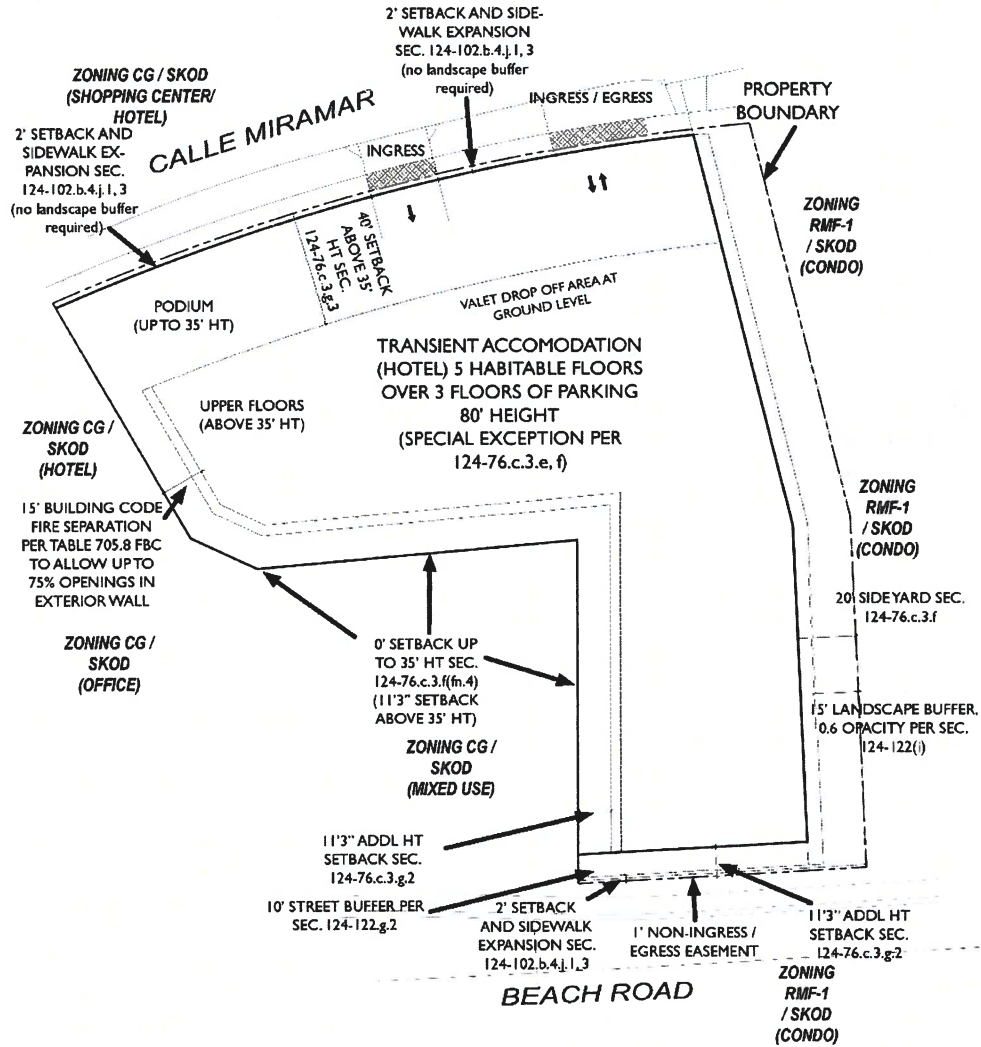
ATTEST:

KAREN E. RUSHING, Clerk
of Circuit Court and ex officio
Clerk of the Board of County
Commissioners of Sarasota
County, Florida.

By: _____

Deputy Clerk

EXHIBIT A
April 30, 2021



SIESTA KEY HOTEL
SARASOTA, FLORIDA

BINDING DEVELOPMENT CONCEPT PLAN
APRIL 2021 CONTACT: (941) 379-7600

Kimley»Horn

EXHIBIT A
A-1

R2021-208

STATISTICS

GROSS ACREAGE:	+/-0.96 ACRES (100%)
EXISTING ZONING:	CG / SKOD
PROPOSED ZONING:	CG* / SKOD
EXISTING USE:	MULTIFAMILY/ OTHER
PROPOSED USE*:	HOTEL (TRANSIENT ACCOMODATION)
DENSITY:	N/A
NUMBER OF ROOMS:	+/- 170 ROOMS
NONRESIDENTIAL SF:	+/- 125,000 SF (PER SEC. 124-305)
REQUIRED PARKING:	187 SPACES
PROPOSED PARKING:	223 SPACES
O/S REQUIRED & PROVIDED:	N/A
EXISTING IMPERVIOUS:	+/- 41,817 SF
TO BE REMOVED	+/- 41,817 SF (100%)
PROPOSED IMPERVIOUS:	+/- 36,481 SF
BUILDING HEIGHT*:	80'

1. ALL ACREAGES/SQUARE FOOTAGE SHOWN ARE APPROXIMATE
2. PARCEL ID NO: 0080240013, 0080240014, 0080240015, 0080240020
3. THREE EXISTING STRUCTURES CURRENTLY ON-SITE
4. UNDERGROUND STORMWATER VAULT SYSTEM WILL BE LOCATED ON-SITE AND SIZED IN ACCORDANCE WITH LOCAL AND STATE REGULATIONS
5. NO GRAND TREES OR PROTECTED ENVIRONMENTAL HABITAT ON-SITE

*SPECIAL EXCEPTION REQUIRED FOR TRANSIENT ACCOMODATION USE AND HEIGHT UP TO 85' PER SEC. 124-76(c)3.e, f

R2021-208