SIMMONS & WHITE
2581 Metrocentre Blvd. W, Suite 3, West Palm Beach, Florida 33407
O 561.478.7848 | F 561.478.3738 www.simmonsandwhite.com
Certificate of Authorization Number 3452

SIMMONS & WHITE
ENGINEERING | PLANNING | CONSULTING | SINCE 1982

INSIGNIFICANT TRAFFIC IMPACT STATEMENT

165 BRADLEY PLACE
TOWN OF PALM BEACH, FLORIDA

Prepared for:

The Chabad House of Palm Beach
361 South County Road
Palm Beach, Florida 33480

Job No. 22-135

Date: July 11, 2022
Revised: July 27, 2022
Revised: September 1, 2022

Digitally signed by Anna Lai
Date: 2022.09.01 16:19:30 -04'00'

Anna Lai, P.E., PTOE
FL Reg. No. 78138

Anna Lai, P.E., State of Florida, Professional Engineer, License No. 56934

This item has been electronically signed and sealed by Anna Lai, P.E., on 09/01/2022

Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.

TABLE OF CONTENTS

1.0 SITE DATA

The subject parcel is located at 165 Bradley Place in the Town of Palm Beach, Florida and contains approximately 0.24 acres. The Property Control Number (PCN) for the subject parcel is 50-43-43-15-08-000-0350.

The site has been vested with a private club/lodge with 3 employees. The club has been analyzed in the Town of Palm Beach approved 165 Bradley Place Traffic Impact Evaluation by Kimley Horn dated January 6, 2017.

Proposed site modifications consist of a 68-student daycare with a build-out year of 2026. Site access is existing via a full access driveway connection to Bradley Place and cross access to a full access driveway connection with Sunrise Avenue. Pedestrians may access the site via the existing sidewalk infrastructure. For additional information concerning site location and layout, refer to the Site Plan prepared by MP Design & Architecture, Inc.

2.0 PURPOSE OF STUDY

This study will analyze the proposed development's impact on the surrounding major thoroughfares within the project's radius of development influence in accordance with the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards. The Traffic Performance Standards state that a Site Specific Development Order for a proposed project shall meet the standards and guidelines outlined in two separate "Tests" with regard to traffic performance.

Test 1, or the Build-Out Test, relates to the build-out period of the project and requires that a project not add traffic within the radius of development influence which would have total traffic exceeding the adopted LOS at the end of the build-out period. This Test 1 analysis consists of two parts and no project shall be approved for a Site Specific Development Order unless it can be shown to satisfy the requirements of Parts One and Two of Test 1. Part One – Intersections, requires the analysis of major intersections, within or beyond a project's radius of development influence, where a project's traffic is significant on a link within the radius of development influence. The intersections analyzed shall operate within the applicable threshold associated with the level of analysis addressed. Part Two – Links, compares the total traffic in the peak hour, peak direction on each link within a project's radius of development influence with the applicable LOS "D" link service volumes. The links analyzed shall operate within the applicable thresholds associated with the level of analysis addressed.

Test 2, or the Five Year Analysis, relates to the evaluation of project traffic five years in the future and requires that a project not add traffic within the radius of development influence which would result in total traffic exceeding the adopted LOS at the end of the Five Year Analysis period.

This test requires analysis of links and major intersections as necessary within or beyond the radius of development influence, where a project's traffic is significant on a link within the radius of development influence.

This analysis shall address the total traffic anticipated to be in place at the end of the build out year. This study will verify that the proposed development's traffic impact will meet the above Traffic Performance Standards.

3.0 TRAFFIC GENERATION

Table 4 shows the daily traffic generation associated with the existing/vested development in trips per day (TPD), and the AM and PM peak hour traffic generation, respectively, in peak hour trips (pht). The traffic to be generated by the private club/lodge with 3 employees may be summarized as follows:

Existing/Vested Development

Daily Traffic Generation	=	141 tpd
AM Peak Hour Traffic Generation (In/Out)	=	6 pht (3 In/3 Out)
PM Peak Hour Traffic Generation (In/Out)	=	12 pht (6 In/6 Out)

The traffic to be generated by the proposed development has been calculated in accordance with the traffic generation rates listed in the ITE Trip Generation Manual, 11th Edition and rates published by the Palm Beach County Engineering Traffic Division. Table 1 shows the daily traffic generation anticipated at project build-out in trips per day (tpd). Tables 2 and 3 show the AM and PM peak hour traffic generation, respectively, as peak hour trips (pht). The traffic to be generated by the proposed 68-student daycare may be summarized as follows:

Proposed Development

Daily Traffic Generation	=	139 tpd
AM Peak Hour Traffic Generation (IN/OUT)	=	26 pht (14 In/12 Out)
PM Peak Hour Traffic Generation (IN/OUT)	=	27 pht (13 In/14 Out)

The change in traffic generation as a result of the proposed site modifications is shown in Table 4 and may be summarized as follows:

Increase in Traffic Generation

Daily Traffic Generation	=	-2 tpd
AM Peak Hour Traffic Generation (In/Out)	=	20 pht (11 In/9 Out)
PM Peak Hour Traffic Generation (In/Out)	=	15 pht (7 In/8 Out)

Based on Chapter D Section 1.C. of the PBC Traffic Performance Standards, a traffic study is not required for a project that generates less than or equal to 20 peak hour trips. Additionally, a concurrency determination for redevelopment is not required for commercial redevelopments when there is no increase in the square footage or intensity of the use of the property from that prior to redevelopment according to Town Code Section 30-74. Due to the reduction in daily trips, no concurrency reservation is required by the Town of Palm Beach. However, a traffic analysis has been provided for informational purposes.

4.0 RADIUS OF DEVELOPMENT INFLUENCE

Based on Table 12.B.2.D-7 3A of the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards, for a net trip generation of 20 peak hour trips, the development of influence shall be the directly accessed link(s).

For Test 1, a project must address those links within the radius of development influence on which its net trips are greater than 1% of the LOS "D" of the link affected on a peak hour, peak direction basis AND those links outside of the radius of development influence on which its net trips are greater than five percent of the LOS "D" of the link affected on a peak hour, peak direction basis up to the limits set forth in Table 12.B.2.C-1 1A: LOS "D" Link Service Volumes.

For Test 2, a project must address those links within the radius of development influence on which its net trips are greater than 3% of the LOS "E" of the link affected on a peak hour, peak direction basis AND those links outside of the radius of development influence on which its net trips are greater than five percent of the LOS "E" of the link affected on a peak hour, peak direction basis up to the limits set forth in Table 12.B.2.C-4 2A: LOS "E" Link Service Volumes.

5.0 TRIP DISTRIBUTION

The project trips were distributed based on the existing and proposed geometry of the roadway network, on existing and anticipated traffic patterns, and on the Town of Palm Beach approved 165 Bradley Place Traffic Impact Evaluation by Kimley Horn dated January 6, 2017. The distributed traffic for the project at full build-out of the development was assigned to the links within the project's radius of development influence. Figure 1 presents the trip distribution percentages.

6.0 TEST 1 BUILD-OUT ANALYSIS

Test 1, or the Build-Out Analysis, relates to the build-out period of the project and requires that a project not add traffic within the radius of development influence which would have total traffic exceeding the adopted LOS at the end of the build-out period. The trip distribution percentages are shown in Tables 5 and 6. Tables 5 and 6 indicate the project's assignment is less than 1% of the applicable LOS "D" threshold and is insignificant for all links within the project's radius of development influence. This project therefore meets the requirements of Test 1.

7.0 TEST 2 BUILD-OUT ANALYSIS

Test 2, or the Five Year Analysis, relates to the evaluation of project traffic five years in the future and requires that a project not add traffic within the radius of development influence which would result in total traffic exceeding the adopted LOS at the end of the Five Year Analysis Period. Tables 7 and 8 show the project's net trip generation is less than 3% of the applicable LOS "E" threshold for all links within the project's radius of development influence. This project therefore meets the requirements of Test 2.

8.0 SITE RELATED IMPROVEMENTS

The AM and PM peak hour volumes at the project entrances for the overall development with no reduction for pass by credits are shown in Tables 2 and 3 and may be summarized as follows:

DIRECTIONAL DISTRIBUTION (TRIPS IN/OUT)

AM =	28 / 25
PM =	25 / 29

As previously mentioned, site access is existing via a full access driveway connection to Bradley Place and cross access to a full access driveway connection with Sunrise Avenue. Based on the Palm Beach County Engineering Guidelines used in determining the need for turn lanes of 75 right turns or 30 left turns in the peak hour, additional turn lanes are not warranted or recommended.

Queue lines are not expected for parking. For additional information concerning the drop off and pick up traffic operational plan, refer to the Principal Parking Occupancy Equivalency Statement prepared by Simmons & White, Inc. dated August 11, 2022.

9.0 CONCLUSION

The proposed development has been estimated to generate a reduction of 2 trips per day, 20 AM peak hour trips, and 15 PM peak hour trips at project build-out in 2026. A brief review of the directly accessed link within the project's radius of development influence reveals the proposed development will have an insignificant project assignment and will therefore meet the requirements of the Palm Beach County Traffic Performance Standards.

Based on Chapter D Section 1.C. of the PBC Traffic Performance Standards, a traffic study is not required for a project that generates less than or equal to 20 peak hour trips. Additionally, a concurrency determination for redevelopment is not required for commercial redevelopments when there is no increase in the square footage or intensity of the use of the property from that prior to redevelopment according to Town Code Section 30-74. Due to the reduction in daily trips, no concurrency reservation is required by the Town of Palm Beach.

Department of Engineering and Public Works
P.O. Box 21229
West Palm Beach, FL 33416-1229
(561) 684-4000
FAX: (561) 684-4050
www.pbcgov.com

August 5, 2022

Anna Lai, P.E., PTOE
Simmons & White, Inc.
2581 Metrocentre Blvd, Suite 3
West Palm Beach, FL 33407

RE: 165 Bradley Place
Project #: 220712
Traffic Performance Standards (TPS) Review

Dear Ms. Lai:

The Palm Beach County Traffic Division has reviewed the above referenced project Traffic Impact Statement, dated July 11, 2022, pursuant to the Traffic Performance Standards in Article 12 of the Palm Beach County (PBC) Unified Land Development Code (ULDC). The project is summarized as follows:

Municipality:	Palm Beach
Location:	SEC of Bradley Pl and Park Ave
PCN:	50-43-43-15-08-000-0350
Access:	Access driveway connection onto Bradley Pl and cross access to the property south of the site connecting to Sunrise Ave (As used in the study and is NOT necessarily an approval by the County through this TPS letter)
Existing Uses:	Private Club/Lodge
Proposed Uses:	Repurpose the existing site as: Daycare = 70 Students
Project Daily Trips:	143
Project Peak Hour Trips:	27 (15/12) AM; 27 (13/14) PM
New Daily Trips:	2
New Peak Hour Trips:	21 (12/9) AM; 15 (7/8) PM
Build-out:	December 31, 2026

Based on our review, the Traffic Division has determined the proposed development does not have significant peak hour traffic impact (as defined in PBC TPS) on the roadway network and, therefore, **meets** the TPS of Palm Beach County.

Please note the receipt of a TPS approval letter does not constitute the review and issuance of a Palm Beach County Right-of-Way (R/W) Construction Permit nor does it eliminate any requirements that may be deemed as site related. For work within Palm Beach County R/W, a detailed review of the project will be provided upon submittal for a R/W permit application. The project is required to comply with all Palm Beach County standards and may include R/W dedication.

No building permits are to be issued by the Town after the build-out date specified above. The County traffic concurrency approval is subject to the Project Aggregation Rules set forth in the Traffic Performance Standards Ordinance.

The approval letter shall be valid no longer than one year from date of issuance, unless an application for a Site Specific Development Order has been approved, an application for a Site Specific Development Order has been submitted, or the approval letter has been superseded by another approval letter for the same property.

If you have any questions regarding this determination, please contact me at 561-684-4030 or email HAkif@pbcgov.org.

Sincerely,

Hanane Akif, P.E.
Professional Engineer
Traffic Division

QB:HA:cp
ec:
Paul Castro, Zoning Administrator, Town of Palm Beach
Quazi Bari, P.E., PTOE, Manager – Growth Management, Traffic Division
Alberto Lopez, Technical Assistant III, Traffic Division

File: General - TPS - Mun - Traffic Study Review
F:\TRAFFIC\HA\MUNICIPALITIES\APPROVALS\2022\220712 - 165 BRADLEY PLACE.DOCX;

165 BRADLEY PLACE

07/08/22
Revised: 07/27/22
Revised: 08/30/22

PROPOSED DEVELOPMENT

TABLE 1 - Daily Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips	Internalization %	Internalization Total	External Trips	Pass-by %	Pass-by Trips	Net Trips
Day Care	565	68	Students	4.09			278		0	278	50%	139	139
			Grand Totals:				**278**	**0.0%**	**0**	**278**	**50%**	**139**	**139**

TABLE 2 - AM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Day Care	565	68	Students	0.78	0.53	0.47	28	25	53	0.0%	0	0	0	28	25	53	50%	27	14	12	26
			Grand Totals:				**28**	**25**	**53**	**0.0%**	**0**	**0**	**0**	**28**	**25**	**53**	**51%**	**27**	**14**	**12**	**26**

TABLE 3 - PM Peak Hour Traffic Generation

Landuse	ITE Code	Intensity		Rate/Equation	Dir Split In	Dir Split Out	Gross Trips In	Gross Trips Out	Gross Trips Total	Internalization %	Internalization In	Internalization Out	Internalization Total	External Trips In	External Trips Out	External Trips Total	Pass-by %	Pass-by Trips	Net Trips In	Net Trips Out	Net Trips Total
Day Care	565	68	Students	0.79	0.47	0.53	25	29	54	0.0%	0	0	0	25	29	54	50%	27	13	14	27
			Grand Totals:				**25**	**29**	**54**	**0.0%**	**0**	**0**	**0**	**25**	**29**	**54**	**50%**	**27**	**13**	**14**	**27**

SIMMONS & WHITE
ENGINEERING | PLANNING | CONSULTING | SINCE 1982

165 BRADLEY PLACE

07/08/22
Revised: 07/27/22
Revised: 08/30/22

TABLE 4
TRAFFIC GENERATION INCREASE

	DAILY	AM PEAK HOUR			PM PEAK HOUR		
		TOTAL	IN	OUT	TOTAL	IN	OUT
EXISTING/VESTED DEVELOPMENT* =	141	6	3	3	12	6	6
PROPOSED DEVELOPMENT =	139	26	14	12	27	13	14
INCREASE =	**-2**	**20**	**11**	**9**	**15**	**7**	**8**

* Existing/vested net trips from the Town of Palm Beach approved 165 Bradley Place Traffic Impact Evaluation by Kimley Horn dated January 6, 2017.

SIMMONS & WHITE
ENGINEERING | PLANNING | CONSULTING | SINCE 1982

SIMMONS&WHITE
ENGINEERING | PLANNING | CONSULTING | SINCE 1982
Authorization No. 3452
2581 Metrocentre Blvd West • Suite 3 • West Palm Beach, Florida 33407 • (561) 478-7848

N
N.T.S.

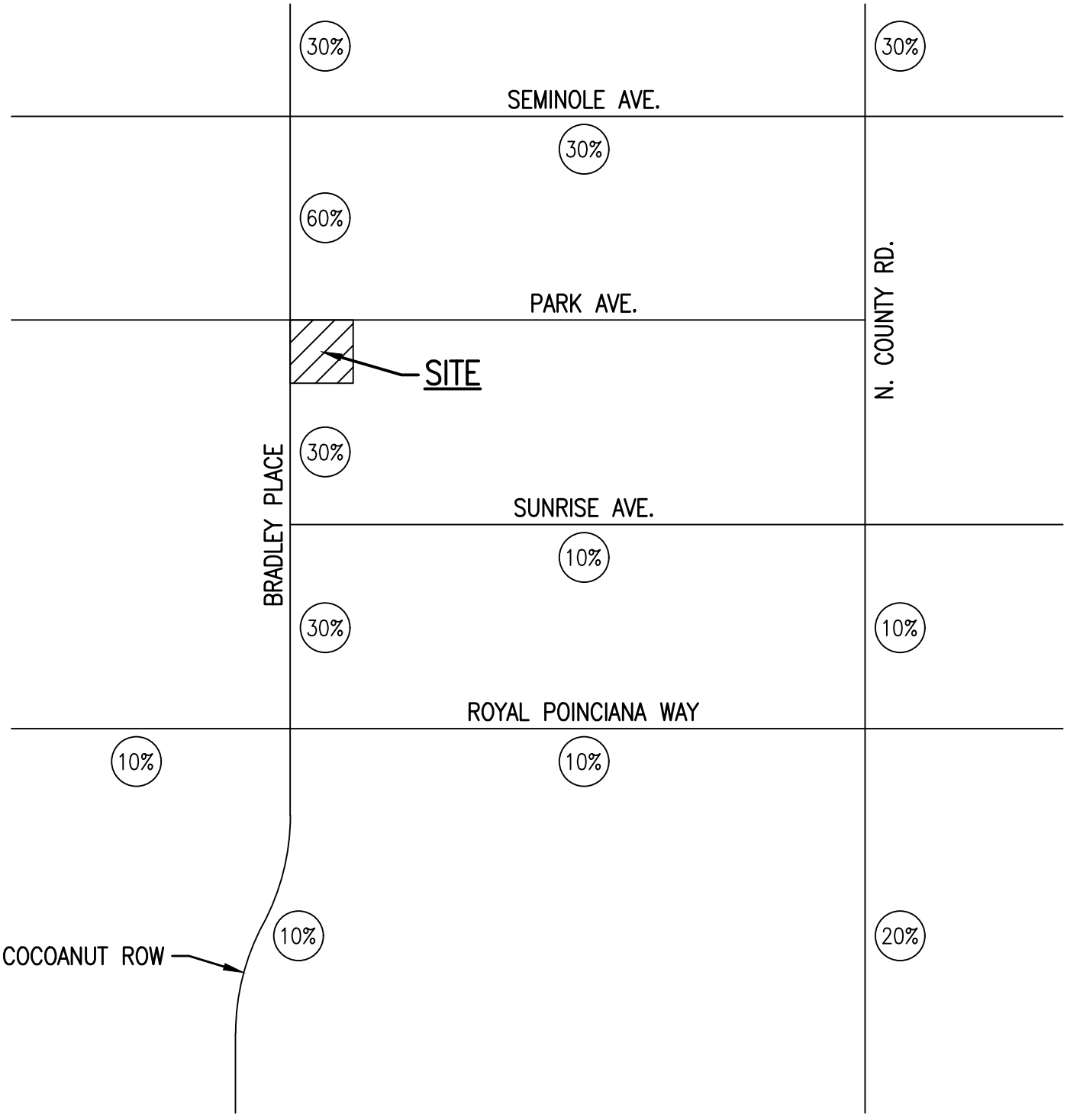


FIGURE 1
PROJECT DISTRIBUTION

LEGEND

(15%) PROJECT DISTRIBUTION

165 BRADLEY PLACE

22-135 AL 07-11-22
REVISED 08-30-22

SIMMONS&WHITE
ENGINEERING | PLANNING | CONSULTING | SINCE 1982
Authorization No. 3452
2581 Metrocentre Blvd West • Suite 3 • West Palm Beach, Florida 33407 • (561) 478-7848

N
N.T.S.

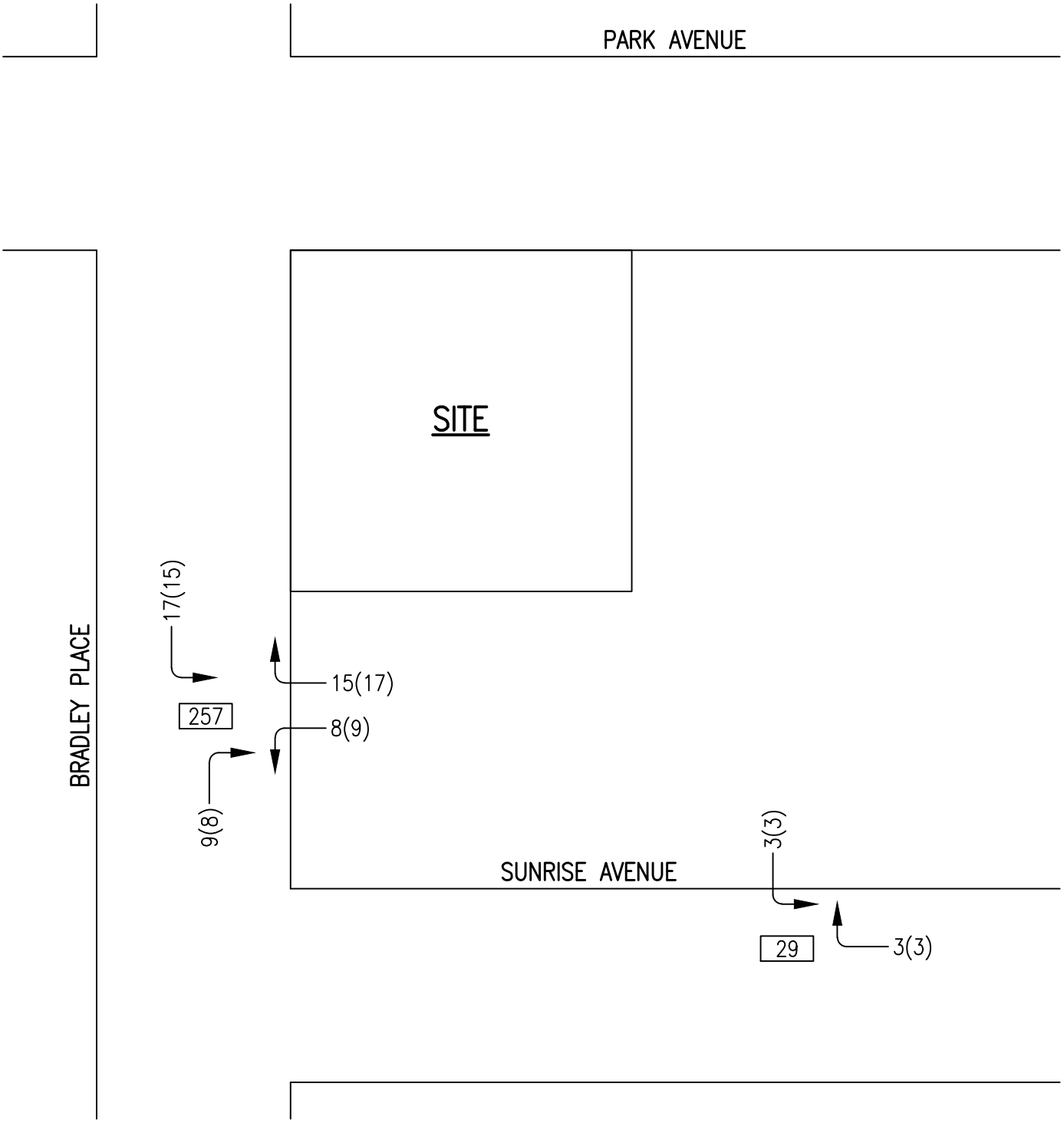


FIGURE 2
PROJECT TURNING MOVEMENTS

LEGEND

14	A.M. PEAK HOUR TURNING MOVEMENT
(18)	P.M. PEAK HOUR TURNING MOVEMENT
413	A.A.D.T.

165 BRADLEY PLACE
22-135 AL 07-11-22

TABLE 5

TEST 1 - PROJECT SIGNIFICANCE CALCULATION
AM PEAK HOUR

2026 BUILD OUT
DIRECTLY ACCESSED LINK(S)
TOTAL AM PEAK HOUR PROJECT TRIPS (ENTERING) = 11
TOTAL AM PEAK HOUR PROJECT TRIPS (EXITING) = 9

STATION	ROADWAY	FROM	TO	PROJECT DISTRIBUTION	AM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS D STANDARD*	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
N/A	SEMINOLE AVENUE	BRADLEY PLACE	N COUNTY ROAD	30%	3	2	II	810	0.37%	NO
N/A	SEMINOLE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	810	0.00%	NO
N/A	SUNRISE AVENUE	BRADLEY PLACE	N COUNTY ROAD	10%	1	2	II	810	0.12%	NO
N/A	SUNRISE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	810	0.00%	NO
N/A	ROYAL POINCIANA WAY	FLAGLER DRIVE	BRADLEY PLACE	10%	1	4D	II	1770	0.06%	NO
N/A	ROYAL POINCIANA WAY	BRADLEY PLACE	N COUNTY ROAD	10%	1	4D	II	1770	0.06%	NO
N/A	BRADLEY PLACE	SANFORD AVENUE	SEMINOLE AVENUE	30%	3	2	II	810	0.37%	NO
N/A	BRADLEY PLACE	SEMINOLE AVENUE	SITE	60%	7	2	II	810	0.86%	NO
N/A	BRADLEY PLACE	SITE	SUNRISE AVENUE	40%	4	2	II	810	0.49%	NO
N/A	BRADLEY PLACE	SUNRISE AVENUE	ROYAL POINCIANA WAY	30%	3	2	II	810	0.37%	NO
N/A	COCOANUT ROW	ROYAL POINCIANA WAY	ROYAL PALM WAY	10%	1	2	II	810	0.12%	NO
N/A	N COUNTY ROAD	WELLS ROAD	SEMINOLE AVENUE	30%	3	4	II	1680	0.18%	NO
N/A	N COUNTY ROAD	SEMINOLE AVENUE	SUNRISE AVENUE	0%	0	4	II	1680	0.00%	NO
N/A	N COUNTY ROAD	SUNRISE AVENUE	ROYAL POINCIANA WAY	10%	1	4	II	1680	0.06%	NO
N/A	N COUNTY ROAD	ROYAL POINCIANA WAY	PINE WALK	20%	2	4	II	1680	0.12%	NO

* LOS D link service volumes based on Table 12.B.2.C-1 1A of the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards.

SIMMONS & WHITE

TABLE 6

TEST 1 - PROJECT SIGNIFICANCE CALCULATION
PM PEAK HOUR

2026 BUILD OUT
DIRECTLY ACCESSED LINK(S)
TOTAL PM PEAK HOUR PROJECT TRIPS (ENTERING) = 7
TOTAL PM PEAK HOUR PROJECT TRIPS (EXITING) = 8

STATION	ROADWAY	FROM	TO	PROJECT DISTRIBUTION	PM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS D STANDARD*	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
N/A	SEMINOLE AVENUE	BRADLEY PLACE	N COUNTY ROAD	30%	2	2	II	810	0.25%	NO
N/A	SEMINOLE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	810	0.00%	NO
N/A	SUNRISE AVENUE	BRADLEY PLACE	N COUNTY ROAD	10%	1	2	II	810	0.12%	NO
N/A	SUNRISE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	810	0.00%	NO
N/A	ROYAL POINCIANA WAY	FLAGLER DRIVE	BRADLEY PLACE	10%	1	4D	II	1770	0.06%	NO
N/A	ROYAL POINCIANA WAY	BRADLEY PLACE	N COUNTY ROAD	10%	1	4D	II	1770	0.06%	NO
N/A	BRADLEY PLACE	SANFORD AVENUE	SEMINOLE AVENUE	30%	2	2	II	810	0.25%	NO
N/A	BRADLEY PLACE	SEMINOLE AVENUE	SITE	60%	5	2	II	810	0.62%	NO
N/A	BRADLEY PLACE	SITE	SUNRISE AVENUE	40%	3	2	II	810	0.37%	NO
N/A	BRADLEY PLACE	SUNRISE AVENUE	ROYAL POINCIANA WAY	30%	2	2	II	810	0.25%	NO
N/A	COCOANUT ROW	ROYAL POINCIANA WAY	ROYAL PALM WAY	10%	1	2	II	810	0.12%	NO
N/A	N COUNTY ROAD	WELLS ROAD	SEMINOLE AVENUE	30%	2	4	II	1680	0.12%	NO
N/A	N COUNTY ROAD	SEMINOLE AVENUE	SUNRISE AVENUE	0%	0	4	II	1680	0.00%	NO
N/A	N COUNTY ROAD	SUNRISE AVENUE	ROYAL POINCIANA WAY	10%	1	4	II	1680	0.06%	NO
N/A	N COUNTY ROAD	ROYAL POINCIANA WAY	PINE WALK	20%	2	4	II	1680	0.12%	NO

* LOS D link service volumes based on Table 12.B.2.C-1 1A of the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards.

SIMMONS & WHITE

TABLE 7

TEST 2 - PROJECT SIGNIFICANCE CALCULATION
AM PEAK HOUR

TEST 2 - FIVE YEAR ANALYSIS
DIRECTLY ACCESSED LINK(S)
TOTAL AM PEAK HOUR PROJECT TRIPS (ENTERING) = 11
TOTAL AM PEAK HOUR PROJECT TRIPS (EXITING) = 9

STATION	ROADWAY	FROM	TO	PROJECT DISTRIBUTION	AM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS E STANDARD*	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
N/A	SEMINOLE AVENUE	BRADLEY PLACE	N COUNTY ROAD	30%	3	2	II	860	0.35%	NO
N/A	SEMINOLE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	860	0.00%	NO
N/A	SUNRISE AVENUE	BRADLEY PLACE	N COUNTY ROAD	10%	1	2	II	860	0.12%	NO
N/A	SUNRISE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	860	0.00%	NO
N/A	ROYAL POINCIANA WAY	FLAGLER DRIVE	BRADLEY PLACE	10%	1	4D	II	1870	0.05%	NO
N/A	ROYAL POINCIANA WAY	BRADLEY PLACE	N COUNTY ROAD	10%	1	4D	II	1870	0.05%	NO
N/A	BRADLEY PLACE	SANFORD AVENUE	SEMINOLE AVENUE	30%	3	2	II	860	0.35%	NO
N/A	BRADLEY PLACE	SEMINOLE AVENUE	SITE	60%	7	2	II	860	0.81%	NO
N/A	BRADLEY PLACE	SITE	SUNRISE AVENUE	40%	4	2	II	860	0.47%	NO
N/A	BRADLEY PLACE	SUNRISE AVENUE	ROYAL POINCIANA WAY	30%	3	2	II	860	0.35%	NO
N/A	COCOANUT ROW	ROYAL POINCIANA WAY	ROYAL PALM WAY	10%	1	2	II	860	0.12%	NO
N/A	N COUNTY ROAD	WELLS ROAD	SEMINOLE AVENUE	30%	3	4	II	1780	0.17%	NO
N/A	N COUNTY ROAD	SEMINOLE AVENUE	SUNRISE AVENUE	0%	0	4	II	1780	0.00%	NO
N/A	N COUNTY ROAD	SUNRISE AVENUE	ROYAL POINCIANA WAY	10%	1	4	II	1780	0.06%	NO
N/A	N COUNTY ROAD	ROYAL POINCIANA WAY	PINE WALK	20%	2	4	II	1780	0.11%	NO

* LOS E link service volumes based on Table 12.B.2.C-4 2A of the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards.

SIMMONS&WHITE

TABLE 8

TEST 2 - PROJECT SIGNIFICANCE CALCULATION
PM PEAK HOUR

TEST 2 - FIVE YEAR ANALYSIS
DIRECTLY ACCESSED LINK(S)
TOTAL PM PEAK HOUR PROJECT TRIPS (ENTERING) = 7
TOTAL PM PEAK HOUR PROJECT TRIPS (EXITING) = 8

STATION	ROADWAY	FROM	TO	PROJECT DISTRIBUTION	PM PEAK HOUR DIRECTIONAL PROJECT TRIPS	EXISTING LANES	CLASS	LOS E STANDARD*	TOTAL PROJECT IMPACT	PROJECT SIGNIFICANT
N/A	SEMINOLE AVENUE	BRADLEY PLACE	N COUNTY ROAD	30%	2	2	II	860	0.23%	NO
N/A	SEMINOLE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	860	0.00%	NO
N/A	SUNRISE AVENUE	BRADLEY PLACE	N COUNTY ROAD	10%	1	2	II	860	0.12%	NO
N/A	SUNRISE AVENUE	N COUNTY ROAD	N OCEAN BOULEVARD	0%	0	2	II	860	0.00%	NO
N/A	ROYAL POINCIANA WAY	FLAGLER DRIVE	BRADLEY PLACE	10%	1	4D	II	1870	0.05%	NO
N/A	ROYAL POINCIANA WAY	BRADLEY PLACE	N COUNTY ROAD	10%	1	4D	II	1870	0.05%	NO
N/A	BRADLEY PLACE	SANFORD AVENUE	SEMINOLE AVENUE	30%	2	2	II	860	0.23%	NO
N/A	BRADLEY PLACE	SEMINOLE AVENUE	SITE	60%	5	2	II	860	0.58%	NO
N/A	BRADLEY PLACE	SITE	SUNRISE AVENUE	40%	3	2	II	860	0.35%	NO
N/A	BRADLEY PLACE	SUNRISE AVENUE	ROYAL POINCIANA WAY	30%	2	2	II	860	0.23%	NO
N/A	COCOANUT ROW	ROYAL POINCIANA WAY	ROYAL PALM WAY	10%	1	2	II	860	0.12%	NO
N/A	N COUNTY ROAD	WELLS ROAD	SEMINOLE AVENUE	30%	2	4	II	1780	0.11%	NO
N/A	N COUNTY ROAD	SEMINOLE AVENUE	SUNRISE AVENUE	0%	0	4	II	1780	0.00%	NO
N/A	N COUNTY ROAD	SUNRISE AVENUE	ROYAL POINCIANA WAY	10%	1	4	II	1780	0.06%	NO
N/A	N COUNTY ROAD	ROYAL POINCIANA WAY	PINE WALK	20%	2	4	II	1780	0.11%	NO

* LOS E link service volumes based on Table 12.B.2.C-4 2A of the Palm Beach County Unified Land Development Code Article 12 – Traffic Performance Standards.

SIMMONS & WHITE

TOWN OF PALM BEACH

Planning, Zoning & Building Department

April 18, 2017

Ms. Maura Ziska, Esq.
222 Lakeview Avenue
Suite 1500
West Palm Beach, FL 33401

Subject: Special Exception #9-2017 with Site Plan Review and Variance, 165 Bradley Place, The Old Guard

Dear Ms. Ziska:

The Town Council, at its April 12, 2017 meeting, conditionally approved your client's special exception with site plan review application to allow a private club "Old Guard Society of Palm Beach" to operate at 165 Bradley Place in the C-TS Zoning District. A variance was also conditionally approved an off-street parking variance to eliminate the requirement for 10 additional parking spaces based upon the principle of equivalency calculation. The applicant is required to enter into an acceptable Declaration of Use Agreement with the Town which outlines the following conditions of approval:

1. The hours shall be limited from noon to 2:30 p.m. and 5:00 p.m. to 11:00 p.m. Monday through Saturday.

2. The maximum membership to the Club shall be 100 people.

3. The maximum number of members and guests during lunch (noon to 2:30 p.m.) shall not exceed twenty people.

4. The number of evening events shall be limited to one time per month from November 1st to May 1st with the exception of December in which the Club can have a maximum of 2 events that month.

5. Valet parking is required for all night events. A valet parking permit from the Police Department shall be required and the valet stand shall be located on subject property and not on any surrounding streets.

6. No music shall be allowed.

7. The applicant shall be responsible to obtain a building permit to remove the kitchen if the Club vacates the subject property

Post Office Box 2029 • 360 South County Road • Palm Beach, Florida 33480
Telephone: (561)838-5430 • Facsimile (561)835-4621
E-Mail: pzb@townofpalmbeach.com • Website: www.townofpalmbeach.com

8. The Town Council shall reconsider the subject approval six months from the date operation of the Club begins to ensure that the applicant is meeting the above conditions and that there are no unintended consequences. Any unintended consequences can be addressed by the Town Council during reconsideration of the approval.

Please provide a draft Declaration of Use Agreement by April 24, 2017. This will provide staff time to review the proposed Agreement and prepared the required backup information for Town Council consideration. This Agreement will be considered at the May 10, 2017 Council meeting.

The Town Council approval of this application for special exception with site plan review and variance constitutes only zoning approval and does not relieve the owner and/or applicant from obtaining additional Town approvals as may be required, such as Architectural Commission approval and required construction permits. The conditional approval is identified on sheet drawings A000 and A100 prepared by MP Design and Architecture, stamp dated February 23, 2017, and made part of the approval of this application. The work authorized under the approval of this zoning application must be commenced within one year from the date of approval or said approval will expire.

Sincerely,

Paul Castro, AICP
Zoning Administrator

cc: John S. Page, Director, Planning, Zoning & Building
Bill Bucklew, Building Official
John Lindgren, Planning Administrator
Benjamin Alma, Code Enforcement
zf & pf

American CONSULTING

American Consulting Professionals, LLC
American Consulting Engineers of Florida, LLC
2818 Cypress Ridge Blvd, Suite 200
Wesley Chapel, Florida 33544
Tel 813.435.2600 • Fax 813.435.2601
american@acp-fl.com • www.acp-americas.com

April 11, 2017

Mr. Paul Castro, AICP
Planning and Zoning Administrator
Town Hall, South Entrance
360 South County Road
Post Office Box 2029
Palm Beach, FL 33480

Re: 165 Bradley Place Traffic Impact Statement Review
Project: 165 Bradley Place, Town of Palm Beach – Replacement of the existing 3,038 SF walk-in bank with a private club/lodge without modifying the square footage
Location: Town of Palm Beach, SE corner of Park Avenue and Bradley Place
ACE Project No.: 5089725.025

Dear Mr. Castro:

American has conducted a review of the Traffic Impact Analysis Statement dated January 6, 2016 for the above subject project for the proposed redevelopment of replacing the existing 3,038 square feet walk-in bank with a private club/lodge without modifying the square footage, received on March 8, 2017 prepared by Kimley-Horn and Associates, Inc. and has provided comments on April10, 2017. The responses to the comments along with the final revised traffic statement were received on April 10, 2017 from Kimley-Horn and Associates, Inc. Based on the response to the comments and the revisions made, the analysis has been approved in accordance with the Town of Palm Beach Traffic Standards.

If you should have any questions, please feel free to contact me at 813-435-2618 or David Bredahl at 813-435-2701.

Sincerely,
American Consulting Professionals, LLC

Arpita Guha, P.E., PTOE

Cc: David Bredahl, AICP (American)
Adam Kerr, PE (Kimley-Horn and Associates, Inc.)

Kimley»Horn

January 6, 2017

Mr. Michael Perry
MP Design & Architecture, Inc.
217 Peruvian Avenue, Suite 4
Palm Beach, Florida 33480

RE: ***165 Bradley Place***
Traffic Impact Evaluation
Palm Beach, Florida

Dear Mr. Perry:

Kimley-Horn and Associates, Inc. was retained to provide a traffic impact evaluation for the above-mentioned site. The site is located at 165 Bradley Place in the Town of Palm Beach, Florida. The PCN for the site is 50-43-43-15-08-000-0350. *Figure 1* shows the site location.

The site currently contains 3,038 square feet of walk-in bank. The proposed redevelopment plan is to replace the existing bank with a private club/lodge without modifying the square footage. The private club/lodge is expected to serve 3 employees and 96 members.

This analysis has been prepared in accordance with the criteria defined in the *Palm Beach County Transportation Performance Standards Ordinance (TPSO)*. A buildout year of 2021 is proposed.

TRIP GENERATION

The daily and peak hour trip generation potential for the proposed development plan was calculated based on trip generation rates published by Palm Beach County and the Institute of Traffic Engineers (ITE) in the *Trip Generation Manual, 9th Edition*. ITE does not provide a daily or AM peak hour trip generation rate for a walk-in bank (Land Use 911); therefore, a ratio between the PM peak hour trip generation rates for a walk-in bank and drive-through bank (Land Use 912) was calculated. The ratio was then applied to the daily and AM peak hour trip generation rates for the drive-through bank to result in generated trips for a walk-in bank. The ratio calculation is provided at the bottom of *Table 1*. For the proposed redevelopment, the trip generation rates for a lodge/fraternal organization (Land Use 591) were used. As shown in the attached pages from the *Trip Generation Manual, 9th Edition*, Land Use 591 can be analyzed using employees or members as the independent variable. *Table 1* illustrates that the rate with employees as the independent variable is higher; therefore, the proposed redevelopment was analyzed using employees as the independent variable to provide a more conservative analysis.

TABLE 1
INDEPENDENT VARIABLE COMPARISON
165 BRADLEY PLACE

Land Use	Intensity	Daily Trips	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed Development								
Private Club/Lodge	3 employees	141	6	3	3	12	6	6
	96 members	28	1	1	0	3	2	1

Trip generation was calculated using the following data:

Daily Trip Generation
- Private Club/Lodge (per employee [ITE 591] = 46.9 / employee
- Private Club/Lodge (per member) [ITE 591] = 0.29 / member

AM Peak Hour Trip Generation
- Private Club/Lodge (per employee [ITE 591] = T = 2.10 / employee (50% in, 50% out)
- Private Club/Lodge (per member) [ITE 591] = T = 0.01 / member (50% in, 50% out)

PM Peak Hour Trip Generation
- Private Club/Lodge (per employee [ITE 591] = T = 4.05 / employee (50% in, 50% out)
- Private Club/Lodge (per member) [ITE 591] = T = 0.03 / member (50% in, 50% out)

As indicated in *Table 2*, the proposed redevelopment plan is expected to generate 22 net new external daily trips, 4 fewer net new external AM peak hour trips (-2 in, -2 out), and 8 fewer net new external PM peak hour trips (-2 in, -6 out). As defined in *Article 12* of Palm Beach County's *Unified Land Development Code* (*ULDC)*, there are fewer than 20 gross peak hour trips generated by the project; therefore, no further significance analysis is required.

TRIP DISTRIBUTION AND ASSIGNMENT

The distribution and assignment of project traffic was determined based upon the characteristics of the surrounding land uses. The anticipated distribution and assignment of project traffic is summarized in *Figure 2*.

TEST 1 SIGNIFICANCE ANALYSIS

Per *Article 12 – Traffic Performance Standards* of the *Unified Land Development Code (ULDC)*, the links on which project traffic is greater than 1% of the level of service (LOS) D generalized service volume are considered to be significantly impacted. As shown in *Tables 3a* and *3b*, none of the links within the radius of development influence are significantly impacted. Therefore, no further analysis is required for Test 1.

SITE CIRCULATION AND TURN LANE REQUIREMENTS

The existing driveways on Park Avenue and Bradley Place are expected to adequately serve patrons of the proposed redevelopment. *Figure 3* illustrates the project driveways. Park Avenue is a one-way street and would serve inbound right-turning vehicles only. The driveway on Bradley Place does not provide direct inbound access to the site since the existing internal site driveway is designated as outbound-only; therefore, the driveway was analyzed as an outbound-only driveway for project trips. According to the Palm Beach County "Guide to Parking Lot and Street Access Design Criteria and Standards," it is necessary to classify project entrances that provide access to the local roadway network as minor, intermediate, or major according to the following criteria:

Kimley»Horn

- Minor – Provides services for a maximum average daily traffic of 500 vehicles.
- Intermediate – Provides services for a maximum average daily traffic from 501 to 2,000 vehicles.
- Major – Provides service for a maximum average daily traffic greater than 2,000 vehicles.

Based on these criteria, the driveways are classified as follows:

- Driveway on Bradley Place: Minor
- Driveway on Park Avenue: Minor

The project driveway volumes were compared to the thresholds identified by the Palm Beach County Land Development Division to determine the turn lane requirements of the site's driveways. Section 300 of the *Design Standards Manual* identifies the threshold for installation of a right-turn lane as an inbound peak hour right-turning traffic of 75 vehicles or more and the threshold for a left-turn lane as an inbound peak left-turning traffic of 30 vehicles or more.

Based upon a comparison of the site driveway volumes to these thresholds, no additional turn lanes or modifications are required at the site's driveways.

CONCLUSION

The analysis was prepared to address the requirements of the Palm Beach County Traffic Performance Standards and the Town of Palm Beach Standards. The foregoing analysis demonstrates that the proposed redevelopment does not significantly impact the surrounding roadway network.

Please contact me at (561) 840-0874 or adam.kerr@kimley-horn.com should you have any questions.

Sincerely,

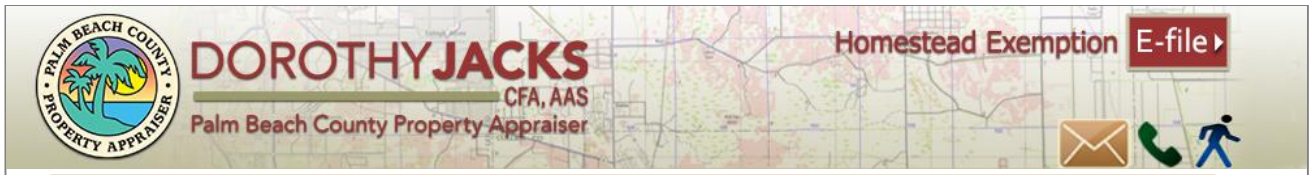
KIMLEY-HORN AND ASSOCIATES, INC.

ADAM B. KERR LICENSE 64773 STATE OF FLORIDA PROFESSIONAL ENGINEER

Adam B. Kerr, P.E.
Transportation Engineer
06 JANUARY 2017
Florida Registration
Number 64773
Certificate of Authorization
Number 696

Attachments

K:\WPB_TPTO\Kraemer\165 Bradley TIA.docx



Location Address	165 BRADLEY PL
Municipality	PALM BEACH
Parcel Control Number	50-43-43-15-08-000-0350
Subdivision	BUNGALOW PARK ADD IN
Official Records Book	15470 Page 1350
Sale Date	JUL-2003
Legal Description	BUNGALOW PARK ADD LOTS 35, 36 & 37

Owners
BILTMORE GALLERIA LLC

Mailing address
PO BOX 3266
PALM BEACH FL 33480 1466

Sales Date	Price	OR Book/Page	Sale Type	Owner
JUL-2003	$10	15470 / 01350	WARRANTY DEED	BILTMORE GALLERIA LLC
DEC-1996	$325,000	09598 / 00174	QUIT CLAIM	WHELTON JOHN C
DEC-1996	$325,000	09598 / 00172	WARRANTY DEED	
AUG-1988	$100	05760 / 00597	WARRANTY DEED	
AUG-1987	$1,859,000	05378 / 00052	WARRANTY DEED	

No Exemption Information Available.

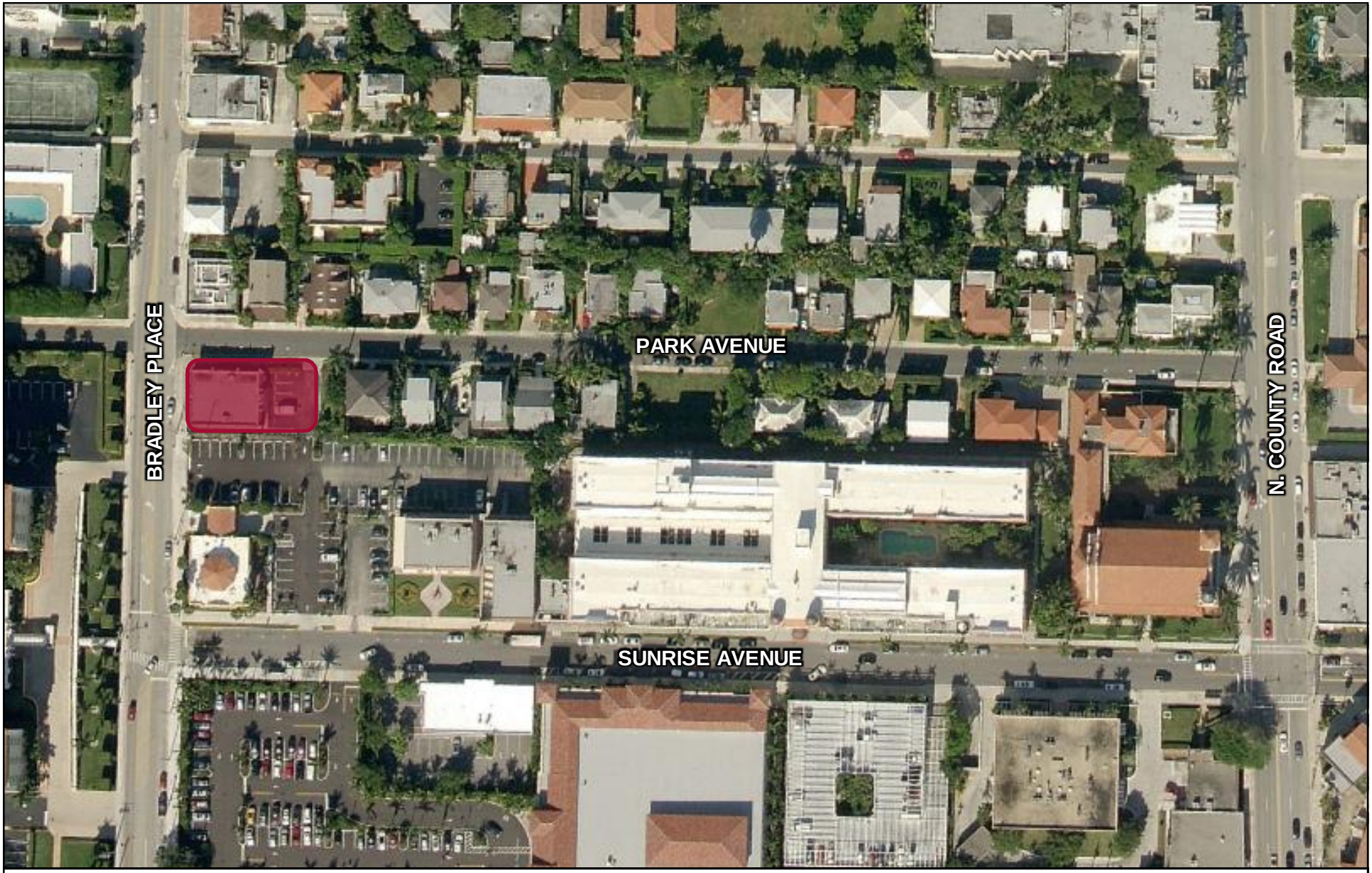
Number of Units	0	*Total Square Feet	3038	Acres	0.2408
Use Code	2300 - FINANCIAL			Zoning	CTS - (50-PALM BEACH)

Tax Year	2016	2015	2014
Improvement Value	$563,450	$519,306	$449,779
Land Value	$1,033,481	$984,288	$984,272
Total Market Value	$1,596,931	$1,503,594	$1,375,000

All values are as of January 1st each year

Tax Year	2016	2015	2014
Assessed Value	$1,596,931	$1,503,594	$1,375,000
Exemption Amount	$0	$0	$0
Taxable Value	$1,596,931	$1,503,594	$1,375,000

Tax Year	2016	2015	2014
Ad Valorem	$27,467	$26,937	$24,951
Non Ad Valorem	$1,285	$1,230	$1,273
Total tax	$28,752	$28,167	$26,224



NORTH

LEGEND

Project Site

FIGURE 1
SITE LOCATION
165 BRADLEY PLACE

Kimley»Horn

TABLE 2
TRIP GENERATION
165 BRADLEY PLACE

Land Use	Intensity	Daily Trips*	AM Peak Hour*			PM Peak Hour		
			Total	In	Out	Total	In	Out
Existing Development								
Walk-In Bank	3,038 SF	225	18	10	8	37	16	21
Pass-By								
Walk-In Bank	47%	106	8	5	3	17	8	9
Driveway Volumes		*225*	*18*	*10*	*8*	*37*	*16*	*21*
Existing Net New External Trips		*119*	*10*	*5*	*5*	*20*	*8*	*12*
Proposed Development								
Private Club/Lodge	3 employees	141	6	3	3	12	6	6
Pass-By								
Private Club/Lodge	0%	0	0	0	0	0	0	0
Driveway Volumes		*141*	*6*	*3*	*3*	*12*	*6*	*6*
Proposed Net New External Trips		*141*	*6*	*3*	*3*	*12*	*6*	*6*
Net New External Trips		*22*	*-4*	*-2*	*-2*	*-8*	*-2*	*-6*

Trip generation was calculated using the following data:

Daily Trip Generation			
Walk-In Bank	0.5*[ITE 912]	=	0.5*(148.15* X / 1,000 SF)
Private Club/Lodge	[ITE 591]	=	46.9 / employee
AM Peak Hour Trip Generation			
Walk-In Bank	0.5*[ITE 912]	=	T = 0.5*(12.08*X / 1,000 SF) (57% in, 43% out)
Private Club/Lodge	[ITE 591]	=	T = 2.10 / employee (50% in, 50% out)
PM Peak Hour Trip Generation			
Walk-In Bank	[ITE 911]	=	T = 12.13*X / 1,000 SF (44% in, 56% out)
Private Club/Lodge	[ITE 591]	=	T = 4.05 / employee (50% in, 50% out)

*Ratio of Walk-in Bank trips to Drive-in Bank trips: $\frac{\text{[ITE 912]}}{\text{[ITE 911]}} = \frac{\text{12.13 PM peak hour trips per 1,000 SF}}{\text{24.30 PM peak hour trips per 1,000 SF}} = 0.5$

k:\wpb_tpto\kraemer\165 bradley place\[165 bradley tripgen 2.xlsx]tgen
1/5/2017 11:03

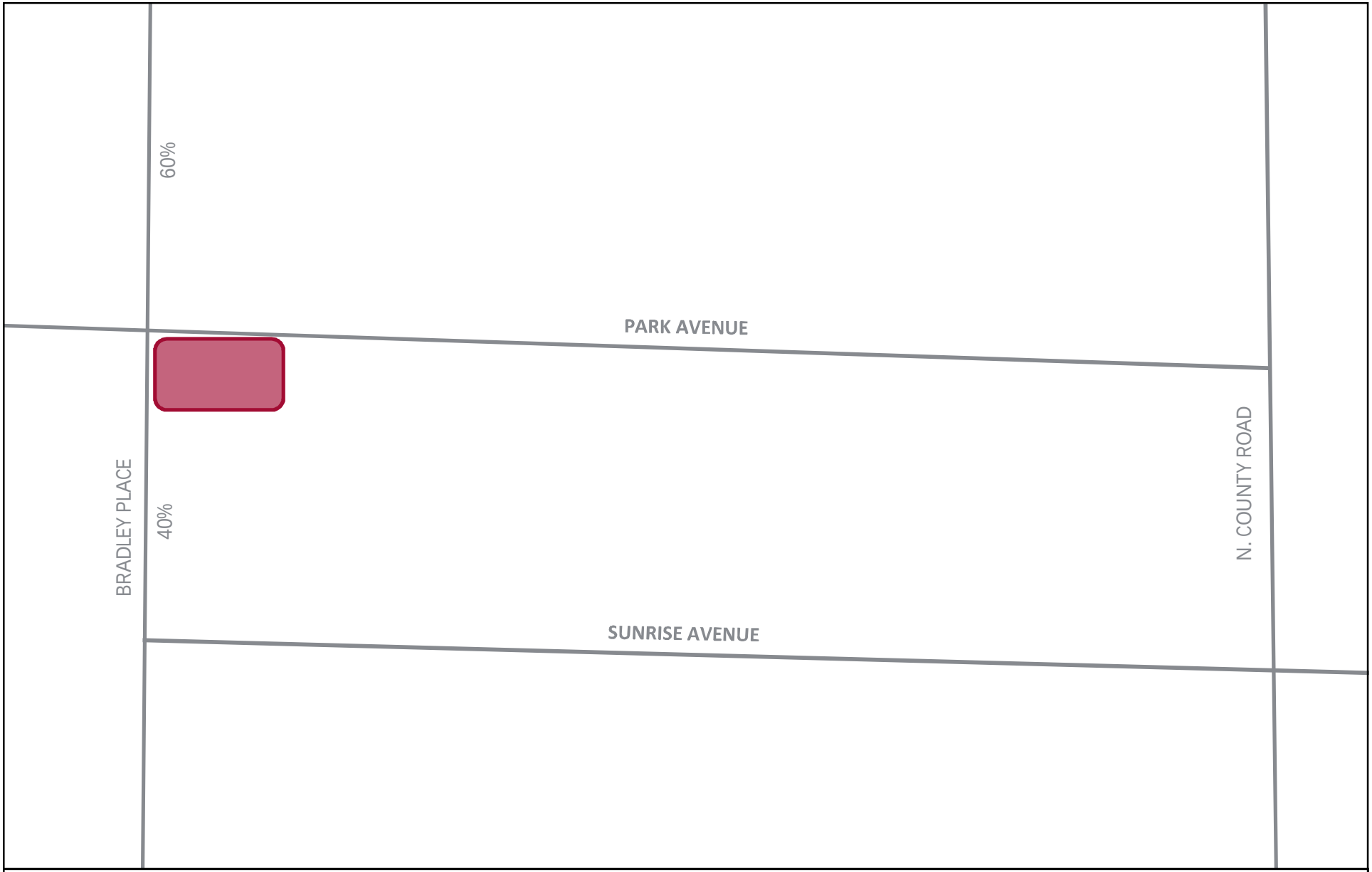


FIGURE 2
PROJECT TRAFFIC DISTRIBUTION
165 BRADLEY PLACE

Kimley»Horn

TABLE 3A
165 BRADLEY PLACE
TEST 1 AM PEAK HOUR SIGNIFICANCE ANALYSIS

ROADWAY	FROM	TO	COMMITTED NUMBER OF LANES	LOS D GEN. SVC. VOLUME	COMMERCIAL % ASSIGNMENT	NB/EB IN/OUT?	AM PEAK HOUR TRIPS NB/EB	AM PEAK HOUR TRIPS SB/WB	AM PEAK HOUR % IMPACT NB/EB	AM PEAK HOUR % IMPACT Sig?	AM PEAK HOUR % IMPACT SB/WB	AM PEAK HOUR % IMPACT Sig?
Bradley Place	Royal Poinciana Way	Project Location	2L	810	40%	i	-1	-1	-0.12%	No	-0.12%	No
Bradley Place	Project Location	N. Lake Way	2L	810	60%	o	-1	-1	-0.12%	No	-0.12%	No

K:\WPB_TPTO\Kraemer\165 Bradley Place\[165 Bradley Tripgen 2.xlsx]Test 1 Sig-PM

TABLE 3B
165 BRADLEY PLACE
TEST 1 PM PEAK HOUR SIGNIFICANCE ANALYSIS

ROADWAY	FROM	TO	COMMITTED NUMBER OF LANES	LOS D GEN. SVC. VOLUME	COMMERCIAL % ASSIGNMENT	NB/EB IN/OUT?	PM PEAK HOUR TRIPS NB/EB	PM PEAK HOUR TRIPS SB/WB	PM PEAK HOUR % IMPACT NB/EB	PM PEAK HOUR % IMPACT Sig?	PM PEAK HOUR % IMPACT SB/WB	PM PEAK HOUR % IMPACT Sig?
Bradley Place	Royal Poinciana Way	Project Location	2L	810	40%	i	-1	-2	-0.12%	No	-0.25%	No
Bradley Place	Project Location	N. Lake Way	2L	810	60%	o	-4	-1	-0.49%	No	-0.12%	No

K:\WPB_TPTO\Kraemer\165 Bradley Place\[165 Bradley Tripgen 2.xlsx]Test 1 Sig-PM

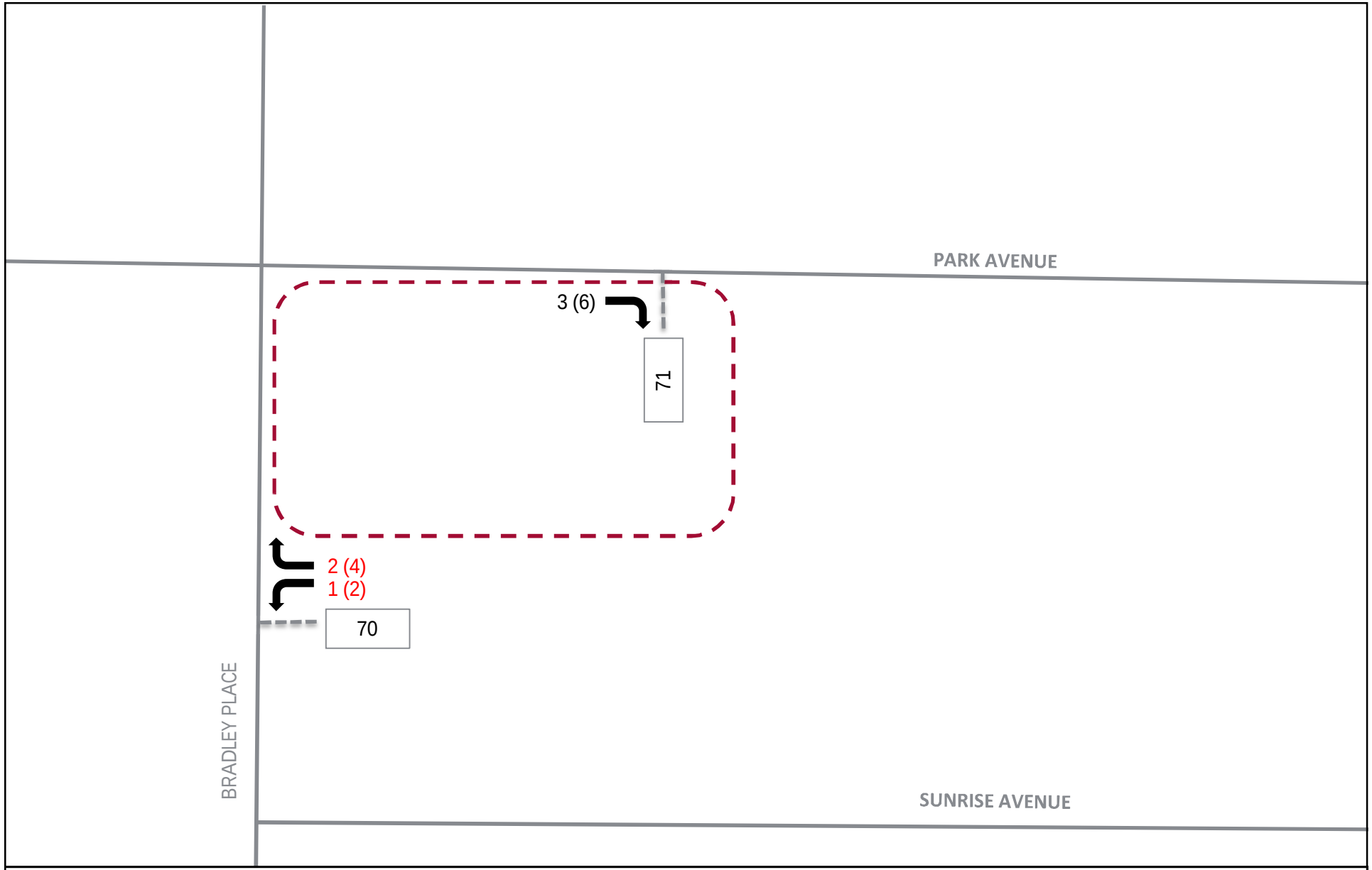


FIGURE 3
DRIVEWAY VOLUMES
165 BRADLEY PLACE

Kimley»Horn

Walk-in Bank
(911)

Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

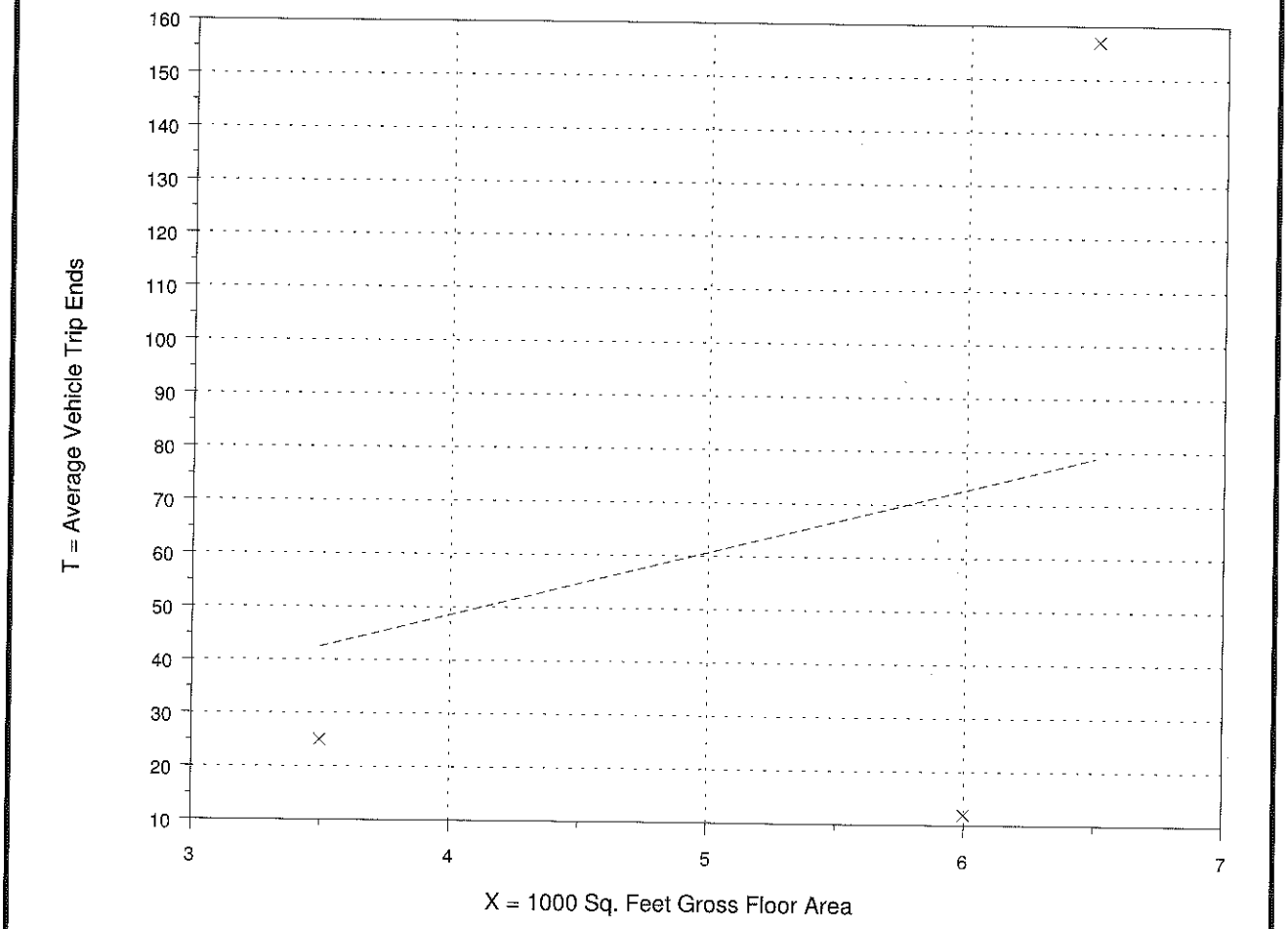
Number of Studies: 3
Average 1000 Sq. Feet GFA: 5
Directional Distribution: 44% entering, 56% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
12.13	2.00 - 24.15	10.96

Data Plot and Equation

Caution - Use Carefully - Small Sample Size



Fitted Curve Equation: Not given

R^2 = ****

Drive-in Bank
(912)

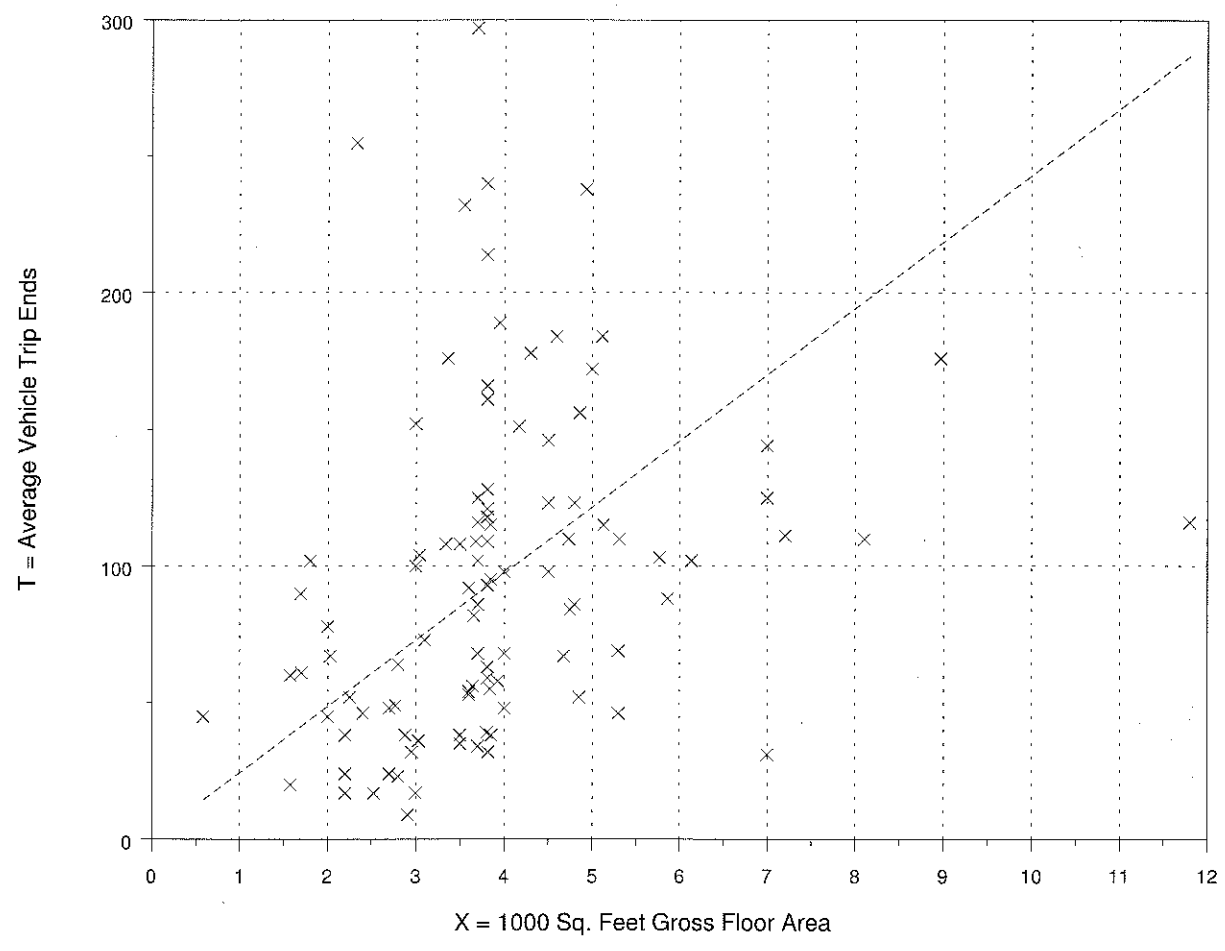
Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

Number of Studies: 102
Average 1000 Sq. Feet GFA: 4
Directional Distribution: 50% entering, 50% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
24.30	3.09 - 109.68	16.24

Data Plot and Equation



Fitted Curve Equation: Not given

R^2 = ****

Drive-in Bank
(912)

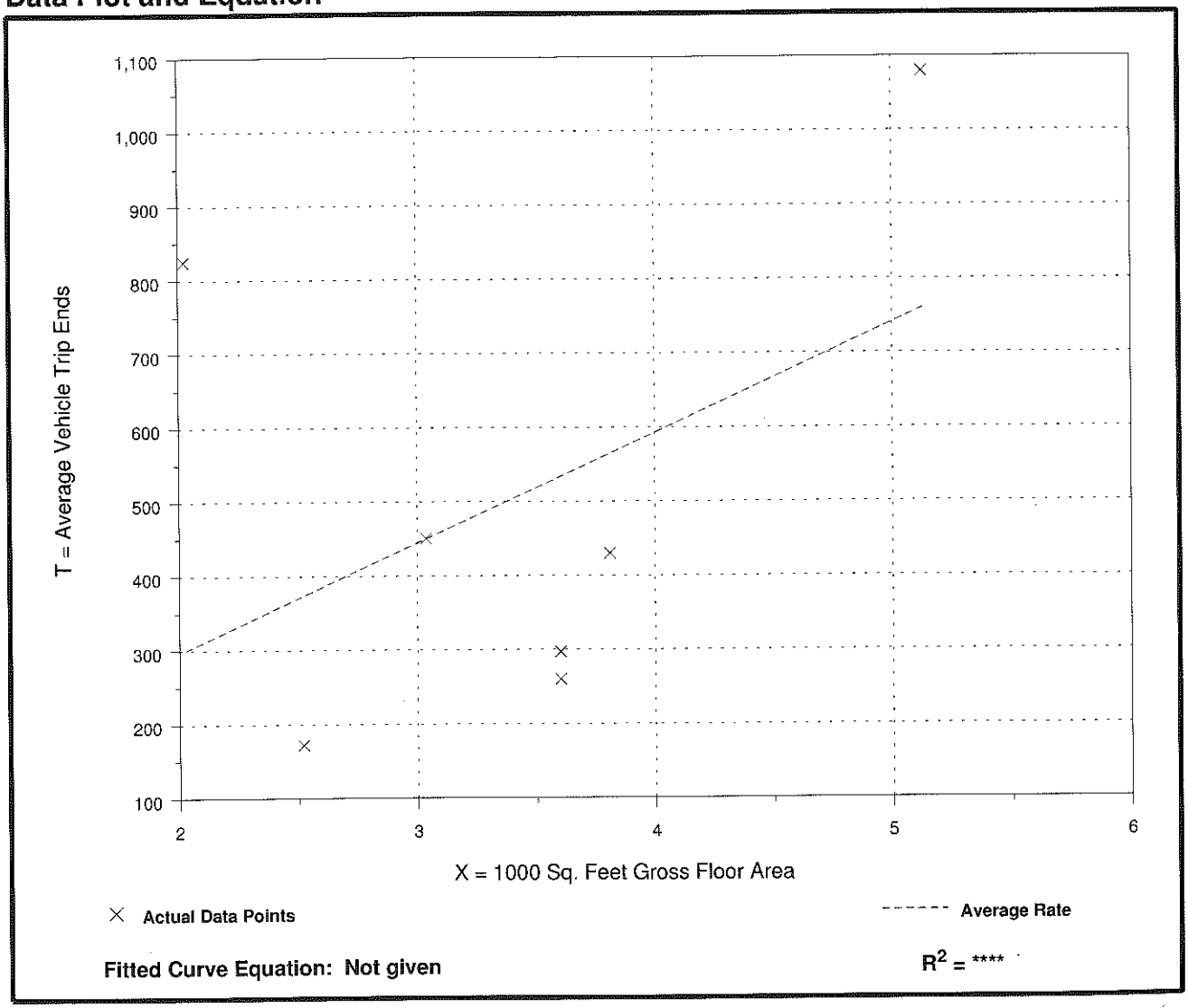
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area
On a: Weekday

Number of Studies: 7
Average 1000 Sq. Feet GFA: 3
Directional Distribution: 50% entering, 50% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
148.15	68.23 - 407.21	97.36

Data Plot and Equation



Fitted Curve Equation: Not given

R^2 = ****

Drive-in Bank
(912)

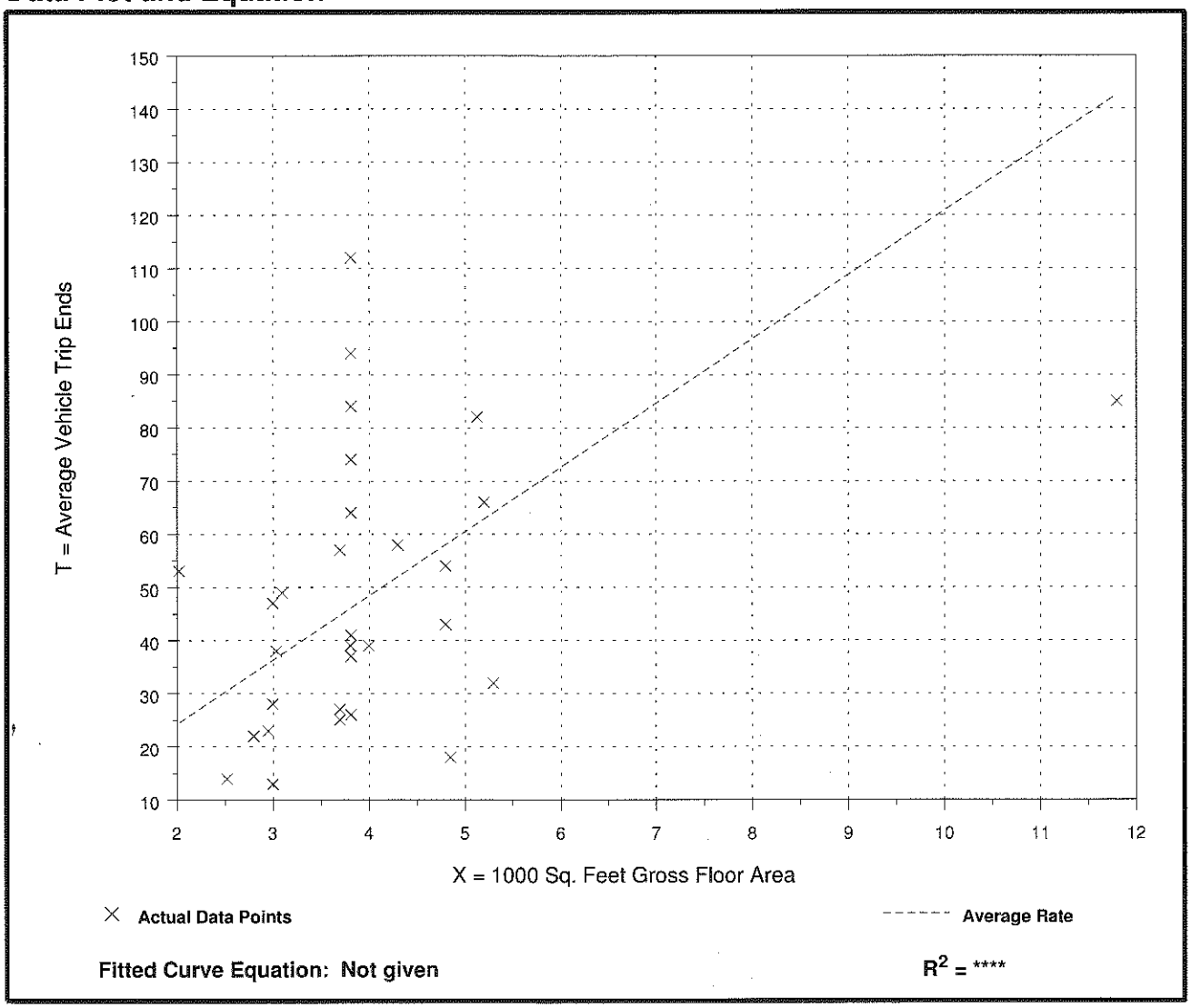
Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

Number of Studies: 31
Average 1000 Sq. Feet GFA: 4
Directional Distribution: 57% entering, 43% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
12.08	3.71 - 29.40	6.88

Data Plot and Equation



Fitted Curve Equation: Not given

R^2 = ****

Land Use: 591
Lodge/Fraternal Organization

Independent Variables with One Observation

The following trip generation data are for independent variables with only one observation. This information is shown in this table only; there are no related plots for these data.

Users are cautioned to use data with care because of the small sample size.

Independent Variable	Trip Generation Rate	Size of Independent Variable	Number of Studies	Directional Distribution
Employees				
Weekday	46.90	20	1	50% entering, 50% exiting
Weekday A.M. Peak Hour of Adjacent Street Traffic	2.10	20	1	Not available
Weekday P.M. Peak Hour of Adjacent Street Traffic	4.05	20	1	Not available
Weekday A.M. Peak Hour of Generator	4.30	20	1	Not available
Weekday P.M. Peak Hour of Generator	4.05	20	1	Not available
Saturday	29.55	20	1	50% entering, 50% exiting
Saturday Peak Hour of Generator	3.10	20	1	Not available
Sunday	29.10	20	1	50% entering, 50% exiting
Sunday Peak Hour of Generator	3.75	20	1	Not available
Members				
Weekday	0.29	3,200	1	50% entering, 50% exiting
Weekday A.M. Peak Hour of Adjacent Street Traffic	0.01	3,200	1	Not available
Weekday P.M. Peak Hour of Adjacent Street Traffic	0.03	3,200	1	Not available
Weekday A.M. Peak Hour of Generator	0.03	3,200	1	Not available
Weekday P.M. Peak Hour of Generator	0.03	3,200	1	Not available