



May 31, 2024

Mr. James G. Murphy
Assistant Director of Planning, Zoning & Building
Town of Palm Beach
360 S County Road
Palm Beach, FL 33480

**RE: *COA-23-003 (ZON-23-020) 139 N County Road (Paramount Theatre)
Response to Review of Paramount Analysis by MacKenzie Engineering & Planning, Inc.
Palm Beach, Florida
KH #140248005***

Dear James:

We have reviewed the March 4, 2024 memorandum prepared by MacKenzie Engineering & Planning, Inc. (MEPI) regarding the 2/9/2023 version of the Paramount Traffic Impact Analysis (TIA). Subsequent to the MEPI memorandum, a traffic impact analyses were submitted to the Town on March 12, 2024 and on April 10, 2024. Furthermore, a further updated traffic analysis, dated May 24, 2024, is being submitted to the Town concurrently with this letter. Below is a summary of the items brought up in the MEPI memorandum and a response to those items based upon the current site plan and traffic study.

Parking

The MEPI memorandum outlines alternate parking calculations, including calculations with different occupancy for the private club and assertions that the private club will operate more like a restaurant, to arrive at a conclusion that parking requirements will not be met.

Response: As documented in the parking calculations and shared parking evaluation for the site, the site is in compliance with the published Code requirements for the Town of Palm Beach. The Kimley-Horn analysis applies the code-defined ratio for private club use and demonstrates that, through the principle of equivalency, the Town's requirements are met. The MEPI "alternate" analysis applies different parking ratios for other use categories instead of the Code-defined ratios in an attempt to arrive at other conclusions, instead of applying the Town's adopted Code for the matching categories of uses on the site.

The MEPI memorandum asserts that additional circulation for valet vehicles to/from an offsite location will result in additional circulation and traffic congestion.

Response: As notes, based upon lower occupancy during weekday conditions prior to 5 PM, valet parking is expected to be contained within the site. Off-site parking will for valet use will only occur on an as-needed basis after 5:30 PM on weekdays and after 2:30 PM on weekends, which does not coincide with peak hour condition on the surrounding network. Therefore, valet operations will not have an off-site impact during the time periods in which congestion has been previously observed on the surrounding transportation facilities.

Transportation

Trip Generation

The MEPI memorandum runs through alternate trip generation calculations and then comes to the conclusion that “Based on this analysis, the Club would conservatively generate 3,305 trips per day.”

Response: This claim defies logic. In order for this level of daily trip generation to occur, it would be the equivalent of every single one of the 475 members making three separate round trips in their own vehicles to and from the club three separate times in a single day, with 455 trips left over for employees, deliveries, etc. The reality experienced at other private clubs in the Town is that only a fraction of the total members of the club would visit the private club once on a typical weekday.

Pass-by Capture

The MEPI memorandum proposes that pass-by capture be applied to existing uses but not proposed use.

Response: As noted in responses to comments provided by other sources, this site is unlikely to generate significant pass-by capture for existing or proposed uses given the location and nature of the uses on site. Therefore, pass-by capture has been removed from the analysis.

Internal capture

The MEPI memorandum proposes that internal capture be applied to existing uses.

Response: Minimal internal capture is experienced among existing uses on site.

Furthermore, as noted, in the updated analysis, actual traffic could collected at the Carriage House between 6:00 PM and 1 AM and submitted to the Town of Palm Beach indicates that the private club peak hour occurs well after 6 PM, and the peak traffic generation at 6 PM from actual private club data is significantly lower than the calculations based upon the ITE data for “Fine Dining”.

Traffic Assignment

The MEPI memorandum uses SERPM data plus counts of households to propose alternate assignments of traffic to/from the site.

Response: Traffic assignment has been revisited in the updated analysis. It is worth noting that judgment needs to be applied when evaluating SERPM data, as it reflects a mix of all trips (e.g., home-based work trips, home-based school trips, etc.) and that primarily all trips to this site are home-based recreation trips, which individually may be different than the aggregate of all types of trips. Furthermore, it is not appropriate to simply add up all households in the nearby TAZs and evenly distribute the trips, as some of the TAZ numbers are skewed significantly by condominiums versus single-family homes, and the different percentages of residents in different housing types are likely to be members in a private club. Again, as noted, some adjustments to traffic assignment have been made in the updated study.

Significance Analysis

The MEPI memorandum uses its own inflated trip generation numbers, updated assignments and adjusted capacities to derive an updated significance analysis.

Response: An updated significance analysis is in the latest traffic study, based upon relevant adjustments that have been made to input values (e.g., trip assignment and roadway LOS D Service volumes), as appropriate. It is important to note that, based upon the subsequent capacity analyses that have been undertaken on the roadway links deemed to be significantly impacted, the Palm Beach County Test 1 standards are met.

Intersection Analysis

The MEPI memorandum notes that 2022 count data was used and, even though the data used was collected after Thanksgiving, no peak season adjustment was applied.

Response: the latest analysis has been updated to use March 2024 count data as the base. No peak season factor has been applied because the data was collected in the peak season.

Historic Growth Rate

The MEPI memorandum proposes a growth rate of 2.5%

Response: In response to comments issued by the Town's Consultant (The Corradino Group), Kimley-Horn has revisited the growth rate. The updated study uses an annual growth rate of 2.33%.

Committed Traffic

The MEPI memorandum lists committed development projects for inclusion in the evaluation.

Response: In coordination with the Town's Consultant (The Corradino Group), Kimley-Horn has included committed development project in the future traffic projections.

Right-Turn on Red (RTOR) Reduction

The MEPI memorandum highlights a line in the volume development worksheets showing a right turn on red reduction.

Response: While this is shown as a default setting in the spreadsheets used for volume development, this was not applied in the software analysis. Nevertheless, for the sake of clarity, this has been removed from the updated volume development worksheets.

Intersection Laneage

County Road & Sunrise Avenue: The MEPI memorandum states that the NBR and SBL lanes do not exist.

Response: Sunrise Ave SB has a shared through/left. This has been updated. There is no NBR striped lane, although larger pavement width exists adjacent to the NBT lane. Nevertheless, the NBR has been removed from the updated analysis.

County Road & Sunset Avenue: The MEPI memorandum states that the EBL and EBT movements share a lane.

Response: This comment is incorrect. Separate lanes are provided for these movements, as noted correctly in the analysis.

County Road & Royal Poinciana Way: The MEPI memorandum states that the exclusive EBL lane does not exist.

Response: This comment is incorrect. This lane exists, as reflected correctly in the analysis.

County Road & Royal Poinciana Way: The MEPI memorandum states that the analysis method of evaluating this as a single intersection (as opposed to two separate intersections on one controller) results in overly optimistic results.

Response: The software used does include some limitations. The analysis methodology employed is typically used for similar circumstances.

Observations

The MEPI memorandum notes deficiencies observed at the intersections along North County Road during certain weekday peak hour conditions.

Response: The Applicant has noted that these conditions can occur during the peak season during certain weekday time periods and has also conducted drone observations during similar time periods for observation purposes. As noted throughout the application process, the proposed private club peak hours occur outside of those weekday daytime time periods and therefore renovation to allow a private club at this location will not exacerbate the existing conditions; in fact, it is anticipated to generate less traffic during certain weekdays peak traffic periods than full occupancy of the existing uses on site would generate.

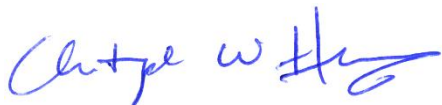
The MEPI memorandum includes comments related to site triangles and loading activity.

Response: These items have been separately addressed by the project Civil Engineer.

We trust that these responses address the comments provided. If there are any additional comments or questions, please contact me via telephone at (561) 840-0248 or via e-mail at chris.heggen@kimley-horn.com.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



Christopher W. Heggen, P.E.
Transportation Engineer