



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)  
Responses to Comments  
Palm Beach, Florida  
KH #241020000***

Dear James:

We are in receipt of comments from the Corradino Group, Inc. dated May 9, 2024, regarding the traffic analysis for the 139 N County Road (Paramount Theatre) site in the Town of Palm Beach. That traffic study has been updated to address these comments and to reflect further refinements made to the site plan. Below are our responses to each of the comments that were denoted as “still pending”; comments noted as “Addressed” have been eliminated for brevity.

## **COMMENTS**

1. Please provide an itemized response to the third-party peer review document dated 01/08/24.

**Kimley Horn and Associates, Inc.’s 03/12/24 Response:** A letter with itemized responses to comments issued by a third-party consultant (Volkert, Inc.) has been prepared and is transmitted with this letter.

**TCG 04/04/24 Response:** Partially Addressed. Please provide a response to any additional third-party peer review comments received to date.

**Kimley Horn and Associates, Inc.’s 04/10/24 Response:** Responses to the additional third-party review comments that were received will be transmitted separately.

**TCG 05/09/24 Response:** This item is still pending. Please provide this additional information.

***RESPONSE: A comment response letter has been prepared separately to respond to various comments issued by Volkert, Inc. (March 12, 2024) and MacKenzie Engineering and Planning, Inc. (March 4, 2024) and is part of this resubmittal.***

3. Please provide a trip generation calculation based on driveway counts at a similar private club in the Town of Palm Beach. Since there are certain peak hours/periods that the ITE Trip Generation Handbook, 11th Edition, does not cover it is important to evaluate the site-generated trips for a similar private club. The Carriage House is another private club in the Town of Palm Beach that could be considered. Please coordinate with the Town of Palm Beach Planning, Zoning and Building Division staff for approval of the similar private club to study.

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** As noted previously, neither ITE nor the Palm Beach County Traffic Division publish a trip generation rate for "Private Club". The ITE "Fine Dining" category has been historically used as the basis for other approvals (e.g., this trip generation rate was used in the approval for the Carriage House application). Based upon the characteristics of the private club use, it is expected that this trip generation rate overestimates trips in comparison to actual conditions, yielding a conservative analysis.

**TCG 05/09/24 Response:** This item is still pending.

**RESPONSE:** *Data that had been collected for the Carriage House private club in the Town of Palm Beach was obtained. That data was only collected during the evening peak hours, which are the peak hours of operation for the private club. The comparison of the earliest evening hour of data collection (6 – 7 PM) for the Carriage House to the PM peak hour trip generation for the "Fine Dining" category demonstrates that the "Fine Dining" trip generation rates are significantly higher than the actual private club trip generation and therefore result in a very conservative analysis.*

4. The intersection operational analysis narratives reference a growth rate based on the FDOT count stations in the vicinity of the project. Please provide an additional separate growth rate analysis that is calculated from the annual road segment count data information over the past five years of usable data (2018, 2019, 2022, 2023 and 2024). This would exclude the 2020 and 2021 years of data due to the traffic circulation impact of the COVID-19 pandemic.

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** For reference, an additional growth rate calculation that excludes 2020 and 2021 years will be provided for reference under separate cover.

**TCG 05/09/24 Response:** This item is still pending. Please provide this additional information.

**RESPONSE:** *The calculated growth rate was updated using daily volumes provided in the Town's annual 2024 volume study. A compounding annual growth rate for each roadway link was calculated using 2018 and 2024 AADT data. To develop an overall growth rate for the study area a weighted average was calculated using the annual growth rate for each of the roadway links. The updated growth rate was determined to be 2.33% using the new calculation based upon this AADT volume data.*

5. Please provide a separate traffic data collection section of the traffic impact study. This section should outline the specific details of when the traffic counts were collected. This should include the day of the week, the specific date and time of day that the traffic counts were collected.

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** A section of text has been added to the traffic study to describe the details regarding the time periods in which the data was collected.

**TCG 05/09/24 Response:** This item is still pending. Please note that manual turning movement counts collected on 03/13/24 for the Town Traffic and Parking Study update determined that the PM peak hour was 3:00 p.m. for the three intersections analyzed as part of the Paramount Palm Beach project. Please review this traffic data and consider updating the traffic analysis with this peak traffic data.

**RESPONSE:** *A section of text has been added to the traffic study to describe the details regarding the time periods in which the data was collected.*

- Please include committed trips from approved but unbuilt development projects. A complete list of Town projects can be obtained from the Town of Palm Beach Planning, Zoning, and Building Division. Please also include any committed trips for approved but unbuilt development projects in the City of West Palm Beach. The intersection volume worksheets provided in the Appendix do not include any committed trips from any approved but unbuilt development projects.

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** A list of projects was provided by the Town's consultant on 4/9/2024. Traffic volumes related to these projects was added to the extent applicable to the updated analysis.

**TCG 05/09/24 Response:** This item is still pending. Additional committed trips from approved but unbuilt development projects in nearby West Palm Beach should be added to the Background Year (2027) and Future Total (2027) scenarios.

**RESPONSE:** *The committed development traffic associated with the approved but unbuilt projects in the list provided by the Town has been included in the revised analysis.*

- Please include additional traffic operational analysis of the following intersections based on the traffic circulation within the radius of influence of the subject Paramount Palm Beach redevelopment:

- Sunrise Avenue and Bradley Place (signalized)
- Sunset Avenue and Bradley Place (signalized)
- Royal Poinciana Way and Bradley Place (signalized)
- Sunset Avenue and Publix Shopping Plaza driveway connections (unsignalized)
- Royal Palm Way and South County Road (signalized)

This should include collection of new traffic data for AM, Midday and PM peak hours. Please provide similar traffic operational analysis for the existing conditions (2024), background conditions (2027) and future conditions (2027).

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** As demonstrated in the traffic analysis, the proposed project has either negative or de minimis traffic impacts at these intersections during the peak hours. Therefore, no additional counts or analyses were conducted at these locations.

**TCG 05/09/24 Response:** This item is still pending. Traffic data was collected at these intersections on 03/13/24 as part of the Town's Traffic and Parking Study update. Please include traffic analysis of these intersections as part of the updated traffic impact study.

**RESPONSE:** *The analysis has been updated to include the following intersections: Sunrise Avenue & Bradley Place, Sunset Avenue and Bradley Place, and Royal Poinciana Way & Bradley Place. The Publix Shopping plaza was not included in the updated analysis because the project will only add project traffic to the through movements along Sunset Avenue and any impacts to delay or LOS would be considered de minimis. The intersection of Royal Palm Way & South County Road was not analyzed because this intersection is outside of the radius of influence for the project and any traffic related impacts at this intersection would be considered to be de minimis.*

8. Please include on-site field observations of the surrounding road network during peak traffic periods (AM, Midday, Midafternoon and PM) to note any traffic operational deficiencies. The recent conversion of Sunset Avenue from a two-way roadway facility to a one-way eastbound roadway facility has created surrounding traffic circulation issues as noted by the Town of Palm Beach Police Department and depicted in a recent aerial drone video. The field observations should include confirmation of the 95th percentile vehicle queuing at the key turn lanes at the subject intersections.



**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** Aerial photographs of observations were conducted during peak hours at the adjacent intersections on North County Road. Primarily, queue spillback between adjacent intersections was observed to occur during the weekday mid-day (e.g., around noon) and mid-afternoon (e.g., around 3 PM) time periods. It has been noted that the proposed redevelopment plan will result in reduced potential traffic during those time periods in comparison to full occupancy of the currently existing uses on site. Photographs will be provided under separate cover.

**TCG 05/09/24 Response:** This item is still pending. Please provide this additional information.

***RESPONSE: Aerial drone photography for the periods noted previously have been included in the supplemental comment response document, for reference.***

10. Please provide a section in the traffic impact study that summarizes the developments compliance with the traffic concurrency as defined in the Town of Palm Beach Code of Ordinances Chapter 30 and the level of service standards as defined in the Town of Palm Beach Code Comprehensive Plan Transportation Element (Policy 2.1). This was presented at the Town Council meeting on 03/13/24.

## Level of Service AM Peak Hour

LOS D, or better, on all surrounding roadways

TABLE 1  
EXISTING 2023 AM PEAK HOUR PEAK SEASON  
LEVEL OF SERVICE (LOS)  
ROADWAY FACILITY DATA

| Location No. | Street Segment                                   | Facility Type | 2023 Peak Hour Volume | Capacity (Veh) | Peak Hour Capacity | LOS C     |                    | LOS B     |                    | LOS A     |                    | Existing Peak Hour LOS |
|--------------|--|---------------|-----------------------|----------------|--------------------|-----------|--------------------|-----------|--------------------|-----------|--------------------|------------------------|
|              |  |               |                       |                |                    | v/c Ratio | Peak Hour Capacity | v/c Ratio | Peak Hour Capacity | v/c Ratio | Peak Hour Capacity |                        |
| 1            | Bradley Blvd (East of SR A1A)                    | SR A111       | 1,200                 | 0              | 800                | 1.50      | 1,300              | 0.90      | 1,400              | 0.86      | 0.80               | D                      |
| 2            | SR A1A   | SR A111       | 1,300                 | 0              | 400                | 1.80      | 1,300              | 0.90      | 1,400              | 0.93      | 0.90               | D                      |
| 3            | North of Royal Poinciana Way                     | UNCLASSIFIED  | 0                     | 0              | 0                  | 0         | 0                  | 0         | 0                  | 0         | 0                  | D                      |
| 4            | SR A1A   | SR A111       | 700                   | 0              | 400                | 1.75      | 1,300              | 0.88      | 1,400              | 0.93      | 0.90               | D                      |
| 5            | Coconut Row                                      | SR C11A       | 600                   | 0              | 500                | 1.20      | 1,400              | 0.86      | 1,500              | 0.93      | 0.90               | D                      |
| 6            | South of Coconut Row                             | SR A111       | 300                   | 0              | 300                | 1.00      | 2,000              | 0.27      | 2,200              | 0.26      | 0.20               | C                      |
| 7            | North County Blvd                                | UNCLASSIFIED  | 0                     | 0              | 0                  | 0         | 0                  | 0         | 0                  | 0         | 0                  | D                      |
| 8            | North County Blvd (South of Southern Blvd)       | UNCLASSIFIED  | 1,300                 | 0              | 800                | 1.63      | 2,000              | 0.65      | 2,200              | 0.59      | 0.50               | D                      |
| 9            | North County Blvd (North of Royal Poinciana Way) | UNCLASSIFIED  | 1,000                 | 0              | 800                | 1.25      | 2,000              | 0.50      | 2,200              | 0.45      | 0.40               | D                      |
| 10           | Coconut Row                                      | SR C11A       | 700                   | 0              | 500                | 1.40      | 1,400              | 0.50      | 1,500              | 0.47      | 0.40               | D                      |
| 11           | Bradley Place                                    | SR C11A       | 500                   | 0              | 500                | 1.00      | 1,500              | 0.67      | 1,600              | 0.63      | 0.50               | D                      |
| 12           | Royal Poinciana Way                              | UNCLASSIFIED  | 1,000                 | 0              | 300                | 3.33      | 1,500              | 0.67      | 1,600              | 0.63      | 0.50               | D                      |
| 13           | Royal Poinciana Way (East of Coconut Row)        | UNCLASSIFIED  | 1,000                 | 0              | 1,200              | 0.83      | 2,000              | 0.41      | 2,200              | 0.36      | 0.30               | C                      |
| 14           | Royal Poinciana Way (West of Coconut Row)        | UNCLASSIFIED  | 1,000                 | 0              | 1,200              | 0.83      | 2,000              | 0.41      | 2,200              | 0.36      | 0.30               | C                      |



Data Source: Town of Palm Beach 2023 Annual Traffic Count Update

## Town of Palm Beach Comprehensive Plan Transportation Element

### Policy 2.1

Level of Service Standard: D

#### POLICY 2.1

The Town shall use the following two-way peak-hour, peak-season level of service (LOS) standards for facilities and segments listed below, effective one year from adoption of this Element.

| FACILITY OR SEGMENT   | "LOS" |
|---|-------|
| (1) SR A1A  | "E"   |
| (2) Royal Poinciana Way   | "D"   |
| (3) Coconut Row/Bradley Place from to Seabreeze to north of Royal Poinciana Way | "E"   |
| (4) Southern Boulevard  | "E"   |
| (5) All other roadways  | "D"   |

The Town will continue to work with the Florida DOT, Palm Beach County and the Palm Beach Metropolitan Planning Organization (MPO) for the purpose of determining an appropriate methodology for determining the level of service on roadways in the Town where there are no traffic signals. The purpose of this effort will be to develop a constrained roadway strategy for SR A1A and Southern Boulevard within the Town.

**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** Information addressing consistency with the Comprehensive Plan will be provided under separate cover.

**TCG 05/09/24 Response:** This item is still pending. Please provide this additional information. The information should be based on the road segment traffic data from the Town's 2024 annual traffic count update report.

**RESPONSE:** A table analyzing the roadway link LOS based upon Town of Palm Beach Comprehensive Plan standards (two-way, peak hour) has been added to the updated traffic study.

12. Please provide a separate pavement marking and signage plan signed and sealed by a professional engineer. Please ensure that the appropriate signage per MUTCD is provided for movement restrictions at the proposed ingress and egress locations included stop signs and Do Not Enter/One-Way signs. The pavement marking and signage plan should include the dimensions and existing pavement markings for the existing surface parking lot. The pavement marking and signage plan should also provide dimensions and geometry (including entrance radii) of each of the driveway connections (ingress only at Sunset Avenue and egress only at Sunrise Avenue). There should be stop bars at the appropriate locations to achieve acceptable stop control, sufficient sight distance and safe pedestrian crossings/crosswalks. Please include typical handicap and regular parking stall details per Town of Palm Beach criteria. The only civil engineering plan sheet provided was plan sheet C-1 which was a utility adjustment plan.

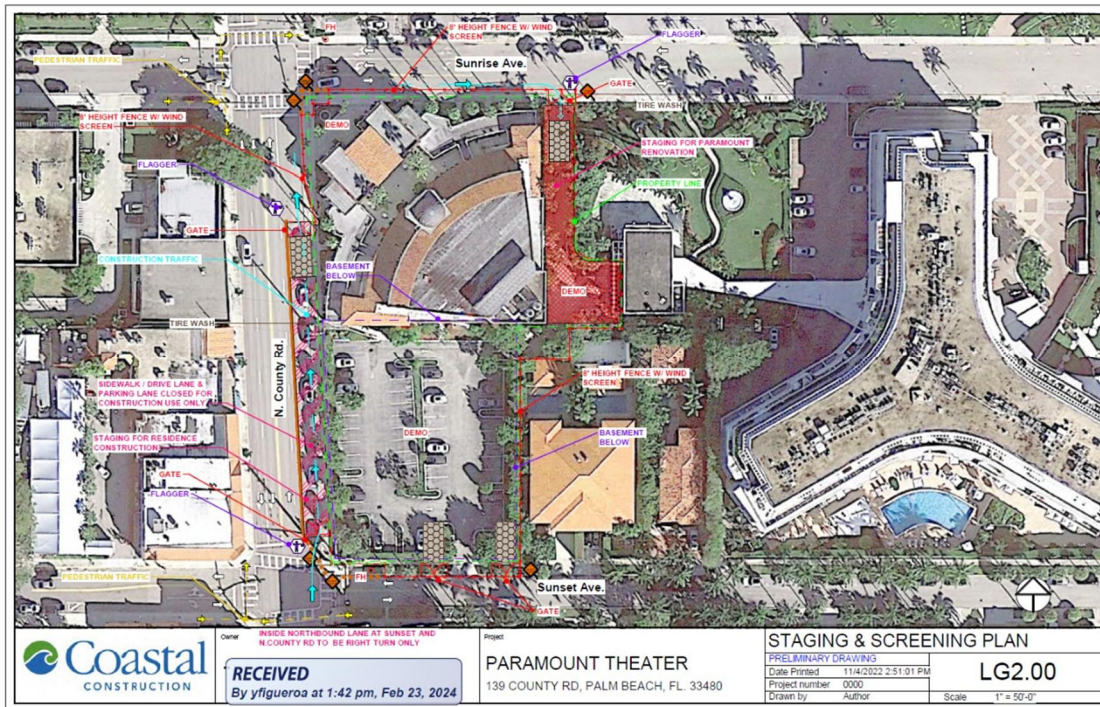


**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** No modifications are proposed for the existing parking areas onsite with the exception of additional landscaping. Detailed pavement markings and signage plans will be prepared by Keshevarz & Associates, Inc. and will be submitted during the Construction Plan approval process. The Applicant commits to working with Town staff to make adjustments as appropriate for enhanced ADA accessibility.

**TCG 05/09/24 Response:** This item is still pending. A condition of approval will be developed which requires the project to address all traffic engineering related comments of the pavement, marking and signage plans once submitted.

**RESPONSE:** Detailed pavement markings and signage plans will be prepared by Keshevarz & Associates, Inc. and will be submitted during the Construction Plan approval process.

13. Please provide details of any anticipated traffic impact on the Town road network based on the construction staging plan sheet LG2.00 which was included in the application plan submittal. This plan sheet should be updated to reflect the new lane geometry based on the one-way eastbound conversion of Sunset Avenue between Bradley Place and North County Road.



**Kimley Horn and Associates, Inc.'s 04/10/24 Response:** The Site Logistics plan has been updated based on the latest site plan and to minimize the impacts and avoid travel lane closures along North County Road. An updated copy has been attached for reference.

**TCG 05/09/24 Response:** This item is still pending. Please provide a copy of the updated Site Logistics plan.

**RESPONSE:** *An updated preliminary construction management plan prepared by the site contractor is to be provided under separate cover, for reference.*

14. There may be future traffic engineering review comments for this application based on the results of the updated Townwide Traffic and Parking Study when completed.

**RESPONSE:** *Noted.*

15. There may be future traffic engineering review comments for this application based on any significant revisions to the applicant's program.

**RESPONSE:** *Noted.*



We trust that these responses and the revisions to the analysis 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](mailto:chris.heggen@kimley-horn.com).

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.

A handwritten signature in blue ink, appearing to read "Chris W. Heggen".

Christopher W. Heggen, P.E.  
Transportation Engineer

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