FLORIDA DEPARTMENT OF TRANSPORTATION

Kittelson & Associates, Inc. (KAI) has reviewed the Response to the Second Statement of Information Needed (SIN) for Parkland Development of Regional Impact (DRI), prepared by Cathy Sweetapple & Associates. The document includes responses to comments provided by KAI on behalf of Florida Department of Transportation (FDOT) District 6 for the original Application for Development Approval and Response to First Statement of Information Needed. Kittelson & Associates, Inc. has reviewed the responses to the Second Statement of Information Needed and offers the following comments on the remaining outstanding issues:

Site Plan:

4. The Applicant's site plan shows direct access to SW 177th Avenue (Krome Avenue) from the site at the half section on 144th Street. This access connection should be removed for any short term considerations.

Response: On September 13, 2006, the Applicant met with the Miami-Dade County Department of Public Works, and reviewed the Conceptual Master Circulation Plan specifically addressing the proposed on-site and off-site roadway improvements for the DRI. Miami-Dade Public Works indicated that they supported the connection of SW 144 Street (a county half section line road) to Krome Avenue. The Applicant will work jointly with FDOT and Miami-Dade County to determine the appropriate phasing of this roadway connection to Krome Avenue.

FDOT: No further action required. It should be noted that in a meeting with the Applicant's attorney it was indicated that they are not interested in a connection with Krome Avenue.

Response: Miami-Dade County Public Works Department indicated that they wanted to maintain the SW 144 Street connection to Krome Avenue. Therefore, the Applicant will work jointly with FDOT and Miami-Dade County to determine the appropriate timing and phasing of this roadway connection.

FDOT: This issue will be resolved with FDOT, the Applicant and Miami-Dade County.

Response: The Applicant has agreed to phase the access connection at SW 144 Street and SW 177 Avenue in coordination with FDOT and Miami-Dade County. The Applicant understands that the access connection at SW 144 Street and SW 177 Avenue will not be permitted unless a driveway connection permit is issued by FDOT. The transportation analysis for Question 21 has not relied upon this driveway connection.

Programmed Transportation Improvements:

19. Page 21-25, Table 21.A4. The widening of SW 152nd Street from SW 157th Avenue to SW 147th Avenue is scheduled for construction in 2009-2011 according to the Miami-Dade Transportation Improvement Program (TIP) Road Impact Fee. FDOT rules only allow for the first three years of transportation improvements contained in the five year work program to be included as background improvements in the DRI traffic study. Since 2009 is the third year of improvements that can be counted for this DRI, and the widening of SW 152nd Street occurs from 2009 through 2011 and thus will most likely not be completed in 2009, it should not be included as a background capacity improvement in the DRI.

Response: The comment is noted. The Applicant has identified this roadway segment as one that needs to be expanded to a 6LD, and one that the Applicant agrees to construct as part of the necessary DRI transportation mitigation. The Applicant will work with the County to coordinate the timing and funding of the full improvement to a 6LD.

FDOT: The Applicant's revisions are noted. The applicant must also revise Table 21.D4, 21.D7 and 21.E1 to be consistent with this comment.

Response: Tables 21.D4, 21.D7 and 21.E1 have been revised as requested.

FDOT: No further action required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 traffic counts for existing traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21.

Please note that the recently adopted TIP 2009 eliminated the funding for the above referenced expansion to SW 152 Street from SW 147 Avenue to SW 157 Avenue. The Applicant has therefore incorporated these improvements into the listing of proposed roadway improvements proposed by the Parkland DRI. All applicable text, tables and maps have been revised in Question 21 to respond to the changes caused by adopted TIP 2009.

Year 2015 Background Traffic Conditions:

21. Page 21-47. The assumption that 15% of traffic will divert from SW 177th Avenue and SW 137th Avenue each to SW 157th Avenue due to improvements on SW 157th Avenue is inappropriate. The improvements along SW 157th Avenue are aimed at relieving congestion on this roadway and to meet future demands. Even with the planned improvements shown in the five-year Transportation Improvement Plan (TIP), SW 157th Avenue would still terminate at SW 184th Street. There are no apparent motivations for traffic that currently travel along SW 177th Avenue or SW 137th Avenue to divert to SW 157th Avenue. The Applicant should remove this assumption in the calculations of future background traffic.

Response: SW 157 Avenue will be improved to a 4 lane divided roadway by Miami-Dade County from SW 184 Street to SW 152 Street, and will be constructed as a new 4 lane divided roadway from SW 136 Street to SW 112 Street. Once completed, this roadway will provide a continuous 4 lane divided roadway corridor from SW 184 Street to north of Kendall Drive, completing an important north-south corridor for West Kendall which does not exist today. The only continuous north-south corridors within this study area consist of Krome Avenue, SW 137 Avenue and the HEFT. Residents using Krome Avenue to access the Kendall community at Kendall Drive will have the ability to divert off of Krome Avenue at SW 184 Street and can then use SW 157 Avenue to access the west Kendall neighborhoods south of Kendall Drive. The diversion from Krome Avenue to SW 157 Avenue is reasonable and demonstrates the future use of the new roadway corridor along SW 157 Avenue. The expansion to SW 157 Avenue is provided to serve as a reliever to parallel roadway facilities, not to relieve congestion on that roadway which operates at LOS C and better today. Miami-Dade County Public Works Department and the MPO subcommittees responsible for advancing roadway projects, recently completed a study to justify allowing the improvements to SW 157 Avenue to advance. The primary justification was to provide the Kendall community with an additional north/south corridor for the community, since SW 147 Avenue cannot serve as a continuous corridor due to the location of the Kendall Tamiami Airport.

FDOT: As stated, the assumption that 15% of traffic will divert from SW 177th Avenue and SW 137th Avenue each to SW 157th Avenue due to improvements on SW 157th Avenue is inappropriate. The improvements along SW 157th Avenue will cause additional growth in traffic based on the existing residential land-uses along this roadway. The 15% reduction is an assumption made by the Applicant that the apartment does not agree with. A diversion of 5% in traffic would be accepted by FDOT.

Response: The Applicant has modified the analysis to utilize a 5% diversion as requested.

FDOT: No further action required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal and the future background traffic conditions analysis now reflects no diversion of traffic off of SW 177 Avenue or SW 137 Avenue. All DRI text, tables, intersection analyses and

maps have been revised to reflect the above referenced updates and modifications to Question 21.

22. Page 21-52, Table 21.D4. This table will need to be updated in response to the revisions requested above and below.

Response: Table 21.D4 has been revised where needed.

FDOT: Consistent with earlier comments, please revise.

Response: Tables 21.D4. 21.D7 and 21.E1 have been revised to respond to this comment.

FDOT: No further action required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 traffic counts for existing traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21.

Project Traffic Distribution:

23. The Applicant should provide trip distribution percentages that consider longer distance (regional) trips, which would typically use SW 152nd Street, SW 120th Street, Krome Avenue, Florida's Turnpike, and SW 8th Street. Please reference the attached sheet containing trip distribution percentages that the Department feel more closely resemble the regional distribution that could be expected.

Response: The Applicant has obtained the distribution sketch provided by the Department's Consultant, and has prepared a revised project distribution in revised Question 21 to more closely respond to FDOT and Miami-Dade County comments.

FDOT: The revised project trip distribution prepared by the Applicant still show too many trips absorbed by the area surrounding the Airport and Metrozoo. Although these areas show many residential units, the Department believes that the development would generate more regional trips. The Applicant should show fewer losses around these areas and carry the trips further. Specifically, SW 137th Avenue north of Kendall and Florida's Turnpike (HEFT) show too few trips. Also, the losses along SW 152nd Street (36% to 18% within a two-mile segment) and SW 136th Street (27% to 15% within a one-mile segment) to east of the site are too unreasonable. The revised distribution should indicate more trips reaching US-1, the HEFT, and SR 874.

Response: The Applicant has identified two calculation errors specifically on SW 136th Street and SW 152 Street that were made when Map J-8D was created to illustrate the cumulative distribution for the home based work trips and non-home based work trips. The Applicant has corrected these errors and has provided the revised distribution percentages on Map J-8D. The losses along SW 136 Street and SW 152 Street have been eliminated.

FDOT: The distribution is consistent with the Department's request. No further action is required.

Response: The Applicant has maintained the Department's project distribution modifications in revised Question 21.

Year 2015 Total Traffic Conditions:

25. Page 21-83, Table 21.D7. This table will need to be updated in response to the revisions requested above.

Response: Table 21.D7 has been revised where needed.

FDOT: Consistent with earlier comments such as #23, please revise.

Response: Table 21.D7 has been revised where needed.

FDOT: No further action required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 traffic counts for existing traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21.

Intersection Analyses:

30. Page 21-91, Table 21.E2. The Applicant must include the Intersection capacity and level of service analysis for Future without Project as well as Future with Project traffic conditions in Appendix 21-7 as part of the sufficiency response.

Response: The intersection analyses are provided in Appendix 21-7 with this sufficiency submittal.

FDOT: The applicant includes intersection improvements for the intersection of SW 152nd Street/SW 147th Avenue due to the widening of SW 152nd Street for the background intersection analyses. Consistent with comment #19, these improvements should not be considered in background. The applicant should revise the background and future intersection analyses for this intersection.

Response: The background intersection analysis has been revised as requested. The future intersection analysis includes the proposed expanded lane geometry for SW 152nd Street as proposed by the Applicant, so this analysis does not need to be revised.

FDOT: In Table 21-7 in Appendix 21-7, it appears that a 0.5% compound growth rate was applied to all existing counts. This differs from the growth rate of 1.06% per year specified in Table 21-7 in Appendix 21-7 of the Response to Second Statement of Information Needed. Since this difference in growth rates will result in significant changes in future volumes, the Future without Project and Future with Project intersection analyses should be redone using the appropriate growth rates.

Response: Question 21 has been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 traffic counts for existing link analysis traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21.

Appendix 21-7 containing the Intersection Analyses has also been revised to incorporate a summary of the intersection results, updated intersection turning movement worksheets, signal timing and the intersection analysis worksheets for existing, future without project for the year 2018 and future with project for the year 2018. The updated intersection turning movement spreadsheet reflects the corrected compound growth rate calculations using updated growth rates calculated for the expanded study area. The intersection turning movement worksheets include the following information on lane geometry:

Existing geometry in place when the turning movement counts were collected;

- Lane geometry in place in 2008 (if different from when counts were collected);
- Estimated future without project lane geometry based upon funded improvements;
- Future with project lane geometry based upon improvements proposed by Parkland.
- 31. Page 21-91, Table 21.E2 indicates the intersections that will be analyzed. This table only includes intersections along SW 184th Street, SW 152nd Street, SW 136th Street and the intersection of SW 177th Avenue/ SW 88th Street. Intersections on each end of a study area roadway that is failing with the DRI contributing five percent or more of the adopted maximum service volume should be analyzed for all three scenarios in Table 21.E2.

Response: The comment is noted and addressed.

FDOT: The DRI significantly impacts the failing links of Krome Avenue from SW 8th Street to SW 152nd Street and from SW 184th Street to SW 216th Street. The applicant indicates that LOS C is achieved on Krome Avenue with the programmed intersection improvements, but not all intersection analyses are provided. The applicant should analyze the intersections of Krome Avenue with SW 8th Street, SW 200th Street, and SW 216th Street to ensure adequate operating conditions.

Response: The Applicant has provided these additional intersection analyses as requested. The turning movement worksheets and intersection analysis worksheets are provided in Appendix 21.7. Table 21.E2 has been revised to include a summary of the analysis results for these additional intersections along Krome Avenue.

FDOT: The Applicant has provided the necessary intersection analyses. Please update based on comment 30.

Response: All intersection analyses have been updated in Revised Appendix 21-7 as outlined in detail in the response to Comment 30.

Proportionate Share Costs of Proposed Off-Site Improvements:

33. Page 21-94, Table 21.F1. This table does not use the most recent FDOT cost estimation unit costs, likely producing a proportionate share cost that is lower than current estimates would show. Please update the table with current FDOT unit cost estimates.

Response: Table 21.F1 has been revised with roadway improvement costs provided by the Applicant based upon contractor roadway expansion costs established by roadway contractors currently building roads in southwest Miami-Dade County.

FDOT: The Applicant should reference the FDOT provided unit costs as provided for Krome Avenue (see attached).

Response: Table 21.F1 has been revised as requested.

FDOT: No further action required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 traffic counts for existing traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21. Please see Tables 21.F1, 21.F2 and 21.F3 prepared in revised Question 21.

34. Page 21-94, Table 21.F1. This table will need to be updated based on the revisions resulting from the above comments. Map J-10 on page 21-95 should also be updated.

Response: Table 21.F1 and Map J-10 have been revised where needed.

FDOT: No proportionate share costs are provided for the widening of Krome Avenue from a two-lane to a four-lane divided cross-section. The Applicant has indicated that discussions have taken place with FDOT about the dedication of right-of-way needed for the expansion of Krome Avenue instead of providing improvements to Krome Avenue. The applicant should still provide proportionate share costs for the widening of Krome Avenue in Table 21.F1.

Additionally, the significant and failing link of Krome Avenue from SW 8th Street to SW 88th Street is not included in this table.

The applicant should provide proportionate share costs for this link.

Response: The intersection analyses along Krome Avenue (at SW 8 Street, SW 88th Street, SW 136 Street, SW 152 Street, SW 184 Street, SW 200 Street and SW 216 Street) for the Year 2015 total traffic conditions maintain the adopted LOS C operational conditions. Therefore based upon the intersection analyses, the corridor is not failing, and no proportionate share calculations are needed.

FDOT: The Year 2015 intersection analysis results for the intersection of Krome Avenue with SW 8th Street, SW 88th Street, and SW 200th Street show operating conditions below the adopted LOS C standard for the corridor. Based on this, proportionate share calculations should be provided to mitigate the significant and failing sections of Krome Avenue. The applicant has provided these calculations for all of the sections except for the section of Krome Avenue from SW 8th Street to SW 88th Street, which should be provided in Table 21.F1.

In Table 21.F1, for the proportionate share calculation for the section of Krome Avenue from SW 88th Street to SW 136th Street a road segment length of 3.00 miles is given. The previous submittal of the ADA application gives a length of 3.4 miles for this segment, which is more accurate for this calculation. A length of 3.4 miles should be used for the proportionate share calculation.

Response: Please note that Question 21 and Appendix 21-7 have been revised in the SIN 3 submittal to maintain consistency with the CDMP Amendment Transportation Analysis, to incorporate updated 2006 and 2007 link traffic counts for existing traffic conditions, to reflect the changes in funded transportation improvements from adopted TIP 2009, to reflect updated growth rates for the expanded study area, to reflect the new DRI build out date established as the year 2018, to reflect updated future without and future with project link and intersection analyses, to reflect revised proportionate share calculations for significantly impacted roadways operating below the adopted LOS, and to reflect an updated listing of proposed roadway and intersection improvements by the Parkland DRI. All DRI text, tables, intersection analyses and maps have been revised to reflect the above referenced updates and modifications to Question 21.

The future without and future with Project intersection analyses incorporate the completed intersection improvements to SR 997/Krome Avenue at SW 216 Street, SW 200 Street and SW 184 Street which are now built and operational, and which were previously funded in TIP 2008, Project No. DT2496145. Each of these intersections have been found to operate at LOS C under Year 2018 Future with Project traffic conditions.

The future without and future with Project intersection analyses for SR 997/Krome Avenue at SW 88 Street incorporate the funded TIP improvements to Krome Avenue pursuant to adopted TIP 2009, Project No. DT2496143. The expansion of SR 997/Krome Avenue from a 2LU to a 4LD is funded for construction in FY 2012 to 2013.

The intersection analysis results for the Year 2018 with Project demonstrate that LOS C is maintained at SR 997/Krome Avenue and SW 216 Street, SW 200 Street, SW 184 Street and SW 88 Street. Not withstanding the LOS C results, revised proportionate share calculations are provided in **Table 21.F2** found in revised Question 21. Please note that no proportionate share calculations are needed for SR 997/Krome Avenue

from SW 88 Street to SW 8 Street, since the construction of the 4LD expanded roadway for the FIHS facility is now funded by FDOT within the adopted five year TIP 2009.

35. Page 21-94, Table 21.F1. Include proposed improvements to study area intersections based on the updated intersection analysis requested above.

Response: Table 21.F1 has been revised to include intersection improvements.

FDOT: Applicant should update this table to be consistent with previous comments.

Response: Table 21.F1 has been revised as needed.

FDOT: The applicant has not indicated whether intersection signalization costs for intersections along SW 152nd Street and SW 184th Street are included in the improvement costs in Table 21.F1. If the costs for intersection improvements are included in these roadway improvement costs, no further action is required.

Response: Please note that Question 21 has been revised in the SIN 3 submittal. All DRI text, tables, intersection analyses and maps have been revised to reflect the updates and modifications to Question 21. Revised proportionate share calculations and an updated listing of proposed roadway and intersection improvements are provided in revised **Tables 21.F1 and 21.F2** found in revised Question 21.

In conclusion, Kittelson & Associates, Inc. finds the proposed ADA associated with the Parkland DRI requires additional information. The applicant should address the remaining issues detailed above.

The remaining issues have been addressed as outlined in the above responses to comments and as included in Revised Question 21 included in the SIN 3 submittal.