FLORIDA DEPARTMENT OF TRANSPORTATION

This Department has completed the review of the sufficiency responses. The specific comments, responses, and resolution of the earlier sufficiency review comments are noted in the attached memo from Kittelson and Associates. The issues noted below remain outstanding.

The analysis shows dramatic reductions of project traffic east of the site on both SW 136 Street, and on SW 152 Street. These project traffic reductions are excessive, and should be revised consistent with Kittelson comment #23, to show additional project trips impacting the HEFT; SR 874, and US 1.

The Applicant has identified two calculation errors specifically on SW 136 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 the non-home based work trips. The Applicant has corrected these errors and has provided the revised distribution percentages on Map J-8D. The "dramatic reductions of project traffic" along SW 136 Street and SW 152 Street have been eliminated and corrected.

The unit costs for the proportionate share calculations are quite low; included for reference (see attachment) are several unit cost calculations for recent FDOT projects. At a minimum the lowest of these (\$4.5 million) should be used for the proportionate share calculation when adding lanes to an existing facility. The cost of a new roadway section would obviously be higher than this, and the applicant should use the unit costs provided in the first submission (\$6 million rather than \$4 million).

Table 21.F1 has been revised as requested.

The applicant needs to show the proportionate share calculations for the widening of Krome Avenue, which is significantly impacted by the project. These calculations were shown in the first submission, but have been removed in the second submission.

The intersection analyses along Krome Avenue (at SW 8 Street, SW 88 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.

This is not an outstanding issue, but needs to be reflected in the Department's response: the applicant has indicated, in our discussions with them, that they do not require an entrance onto Krome Avenue (SR 997) at SW 144 Street.

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.

Kittelson & Associates, Inc. has reviewed the ADA and offers the following comments:

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.

Applicant 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.

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.

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.

Applicant 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.

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

Year 2015 Background Traffic Conditions:

21. 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.

Applicant 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 157 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.

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

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

Applicant response: Table 21 .D4 has been revised where needed.

FDOT: Consistent with earlier comments, please revise.

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

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 he expected.

Applicant 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 137 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.

The Applicant has identified two calculation errors specifically on SW 136 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 the 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.

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.

Applicant response: Table 21.D7 has been revised where needed.

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

Applicant response: Table 21.D7 has been revised where needed.

Intersection Analyses:

30. 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.

Applicant 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.

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.

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.

Applicant 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.

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.

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.

Applicant response: Table 21.FI 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).

Table 21.F1 has been revised as requested.

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.

Applicant 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.

The intersection analyses along Krome Avenue (at SW 8 Street, SW 88 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.

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

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

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

Table 21.F1 has been revised as needed.