

April 13, 2009

Mr. Brad Shockley  
New Castle County  
Department of Land Use  
87 Reads Way  
New Castle, DE 19720

RE: Stoltz Properties  
Greenville Shopping Center  
Reply to Apex's letter dated 3/18/09

Dear Mr. Shockley:

Orth-Rodgers & Associates (ORA) has received a copy of a letter dated March 18, 2009 from Apex Engineering, addressed to you in regards to the Greenville Shopping Center (GC). The letter provides a rebuttal to many of the issues previously raised by ORA. Based on the Apex response which notes "the complex is operating satisfactorily at this time", we feel obligated once again to point out that our review of the site has produced a different result.

In general, we believe there are existing design issues that are not being considered as part of the proposed site plan. The comments noted in the March 18, 2009 Apex letter reaffirms our concern that the applicant is not fully considering these existing issues. Our goal is to bring these issues to the County and to DeIDOT, and to ensure these issues are properly reviewed and addressed. If you feel that it is advantageous, ORA would gladly meet on site with County and/or DeIDOT personnel to point out and openly discuss the issues we have observed. However, for now we provide our written response to the Apex letter, with the following comments:

1. Traffic Count/Trip Generation Data

a. Traffic Count Data - The Apex letter notes that we had incorrectly referred to the weekday peak hour traffic volumes as "Friday" traffic counts, when in fact the counts were collected on a Tuesday. Due to a lack of information displayed on the approved traffic volume figures, we have made an incorrect assumption. As such, we stand corrected and will now refer to this count data as the "weekday" peak hour counts. However the terminology does not relate to our concerns about the validity of the data itself.

Previously ORA noted a discrepancy in the count volumes. It was pointed out that during the weekday PM peak hour 90% of the site traffic uses the Buck Road access while only 17% use that same access point on a Saturday. We still continue to question those results. The Apex reply noted that it was unclear as to where this information was derived from. However, those results are based on the traffic volume figures as prepared by Apex and approved by DeIDOT in their August 26, 2008 review letter, a copy of which

is attached. As previously noted, we are convinced that these figures have errors and we request that DeIDOT reassess their approval of those traffic volume figures.

Apex makes note of the PETRA Pro software and states that ORA should have used these raw data files as a basis for our review. However, "As a certified DeIDOT traffic consultant" Apex should know that as part of the DeIDOT review process, the raw traffic count data is often subject to manual adjustments and balancing. We would also point out that the TIS/TIA work that is yet to be completed should employ the DeIDOT approved volumes and not the raw data files. As such, ORA has based our comments on the data as currently approved by DeIDOT.

b. Trip Generation – ORA has previously pointed out that retail oriented development will typically generate more peak hour traffic on Saturday when compared to the weekday conditions, and that the GC count data does not follow that typical trend. We recognize that this is an existing facility and that its actual traffic characteristics should not be expected to exactly match a text book example, but in this case the differences are rather drastic. For example, the Apex traffic volume figures show the Buck Road access point having a weekday peak hour total of 406 vehicles (entering and exiting). While during the Saturday peak hour the traffic count show just 38 vehicles using the Buck Road access.

The Apex rebuttal letter explains that the reduced Saturday volume is due to the fact the office space component of the site is closed on the weekends. Surely we agree that office traffic is reduced on a Saturday, but the GC is also active weekend site with roughly 70,000 square feet of existing retail space. Whether it be conventional wisdom or sound traffic engineering principals, it is obvious that a Saturday peak hour volume of just 38 vehicles at the Buck Road access point is questionable. We therefore request that DeIDOT further review the Apex traffic counts and provide their input on the questions raised by ORA.

For comparison purposes we are providing tables that show the standard ITE trip generation results compared with the currently approved traffic volumes for the site. We understand that these standardized ITE projections cannot be expected to fully match the data of the existing site. However it does help point out that the retail component of the GC should be viewed as the more significant traffic generator and that the office component is not likely to have such as large impact during the Saturday peak.

**Greenville Center  
 Weekday PM and Saturday Peak Hour Trip Generation  
 Existing Conditions (138,770 SF)**

Land Use	ITE Code	ITE PM Peak Hour			ITE Saturday Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Assumed 50/50 split							
69,385 SF Office	710	27	130	157	15	12	27
69,385 SF Retail	820	244	254	498	352	324	676
<b>ITE Totals</b>		271	384	<b>655</b>	367	366	<b>703</b>
<b>Traffic Count Totals</b>		213	240	<b>453</b>	114	114	<b>228</b>

As can be seen in the table, even with a 50/50 split of office and retail space, ITE research clearly shows that the retail land use would typically generate significantly higher volumes during both the weekday and Saturday peak periods. We do not agree with Apex's opinion that the reduced office traffic on a Saturday could account for such large variations in traffic volume and distributions.

## 2. Buck Road Access

ORA has been to the site and viewed this location on several occasions. We have observed extended queues both entering and exiting the site and have noted that the sites' proposed redevelopment plan seems to make no effort to improve access or the circulation within. Frankly, we believe the Apex reply of simply noting that the access was approved by DelDOT and has been in operation for several years is somewhat shortsighted. We feel that the proposed redevelopment plan should be viewed as an opportunity to improve the issues that currently exist.

In our previous letter, we noted the various existing deficiencies and the fact that the site access once met DelDOT standards is not enough to say that improvements should not be made. We listed several suggestions as to how to improve site access in a manner which we felt would be in the best interest of both the developer and the general public. Therefore we stand behind the comments made in our March 2, 2009 letter and ask that all reviewing agencies consider their validity as they relate to today's proposed site plan.

## 3. Truck Loading

It has been observed on several occasions that only one truck at a time will utilize the loading dock area, despite the fact that the dock has two loading bays for trucks to use. There are two main reasons why this occurs:

- a. The dock area is not wide enough to easily accommodate two trucks at one time. The accessibility of a second truck is all too dependent on the proper positioning of the first truck. As seen in captured video, some drivers were observed making multiple attempts at backing into these closely spaced loading bays, while other drivers choose to wait in the parking aisle until the dock area was empty.
- b. The dock area is also adjacent to the market's trash compactor/dumpster. The loading bay closest to the dumpster is often blocked by large bundles of compressed cardboard that are intended for disposal. The presence of these cardboard bundles further reduces the ability to have two trucks at the dock.

The restricted operation of the loading area appears to cause more than a "momentary delay" as noted by Apex. There are instances where trucks will park, unload and make

their store delivery, all while double parked in the parking aisle. This situation blocks access to adjacent parking spaces and the vehicles parked in those spaces. Additionally it reduces the aisle width down to just one travel lane which is then shared among two-way traffic.

The fact that this site has been in operation since the 1970's should not be seen as evidence that these conditions are acceptable. The loading situation seems to be a clear problem, as it frequently hampers vehicular circulation. With the Stoltz organization preparing to further invest in this site, we feel that the truck loading situation should be more of a priority in their plans. Specifically we feel that implementing the site plan as proposed will further increase traffic along the aisle leading to the loading dock, as the plan places more square footage towards the rear of the site.

4. Post Office

It appears that the details associated with the proposed post office are still preliminary in nature. As the project moves forward, we request that our comments be considered. At this time we have no further comments.

5. Parking Supply/Parking Garage

The applicant, to our knowledge, has yet to determine or disclose the proposed number of structured parking spaces. We feel the proposed size and operational features of the site parking layout will go hand in hand with many of the on site circulation issues we have identified.

6. Route 52 Access

The concept of an internal connection between GC and the Greenville Crossing Shopping Center is one of the various improvements that will aide in providing some relief to the access and circulation issues that currently exist on the site. Despite the results of the developer's past efforts, we feel the County and DeIDOT should still consider the benefits of an internal connection and provide the required support in having it implemented.

With regards to redesigning the Route 52 access to a more standard type intersection, it is our opinion that there is technical merit to allowing left-turns into the site. We also recognized that there are various hurdles and considerations that would need to be addressed prior to committing to such improvements. We request that the TIS include a scenario in which the Route 52 access includes a left-turn lane into the site from southbound Route 52.

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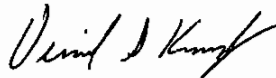
In conclusion and based on the actual conditions which exist on the site today, we feel there are various transportation issues that are not being addressed as part of the proposed plan. It is our objective to bring these items to your attention, so that they may be properly addressed as part for the review and approval process.

Based on the comments noted in the March 18, 2009 Apex response, we felt compelled to respond in writing. However, as previously noted we would be more than willing to meet at the site location and personally review these existing conditions with you.

Very truly yours,  
ORTH-RODGERS & ASSOCIATES, INC.



Jeffrey L. Greene, PE, PTOE  
Principal



Derrick Kennedy, PTP  
Senior Project Manager

DSK/tbm  
Enclosure

Cc: Mark Chura, Delaware Greenways  
Dave Culver, NCC Land Use Department  
Ralph Reeb, DelDOT  
Ted Bishop, DelDOT  
T. William Brockenbrough, DelDOT  
Steven G Davies, Apex Engineering  
Councilman Robert Weiner, Council District 2  
Senator Michael Katz, State Legislative District 4  
Representative Gerald Brady, State Legislative District 4  
Representative Deborah Hudson, State Legislative District 12



STATE OF DELAWARE  
**DEPARTMENT OF TRANSPORTATION**  
 800 BAY ROAD  
 P.O. BOX 778  
 DOVER, DELAWARE 19903

CAROLANN WICKS, P.E.  
 SECRETARY

August 26, 2008

Ms. Carol Ohm  
 Apex Engineering, Inc.  
 27 West Market Street  
 Newport, DE 19804

Dear Ms. Ohm:

We have reviewed the traffic counts that we received on August 21, 2008 for the **Greenville Center** (SNR 6631) traffic impact study (TIS). The counts are acceptable as submitted, subject to the adjustment of the traffic volumes at the Delaware Route 141 grade-separated intersection during the p.m. peak hour. Please find a figure depicting the volume adjustment enclosed with this letter.

Considering background growth factors, please apply the following growth factors to the seasonally adjusted traffic volumes in developing future traffic:

<u>Road</u>	<u>Growth Factor</u>	<u>Total Growth from 2008 to 2012</u>
Delaware Route 141	1.02	1.08
Kennett Pike (Delaware Route 52)	1.02	1.08
Montchanin Road (Delaware Route 100)	1.02	1.08
Hillside Road (New Castle Road 264)	1.02	1.08
Buck Road (New Castle Road 265)	1.02	1.08
All Other Roads	1.00	1.00

You may contact Mr. Troy Brestel at (302) 760-2167 if you have any questions concerning this correspondence.

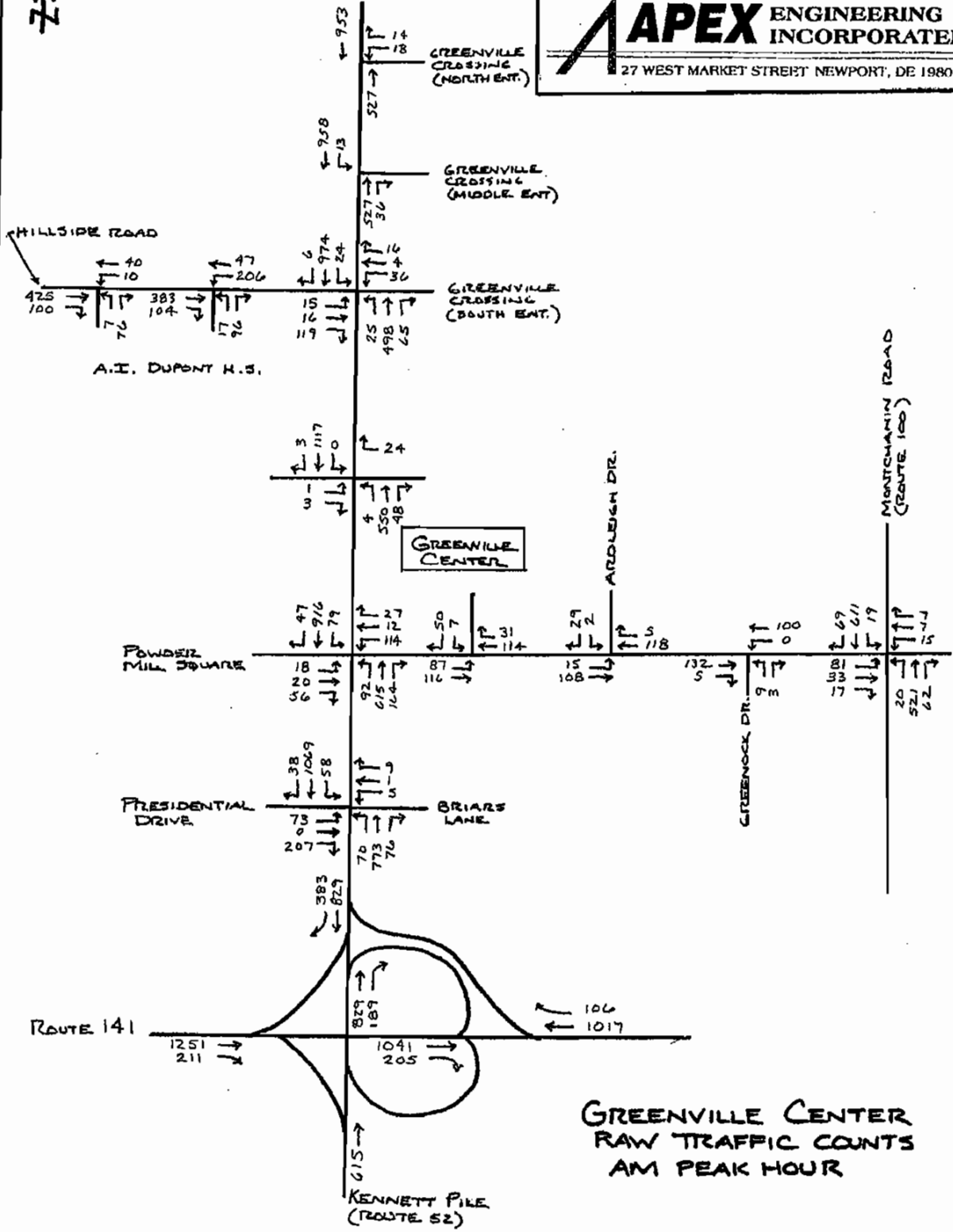
Sincerely,

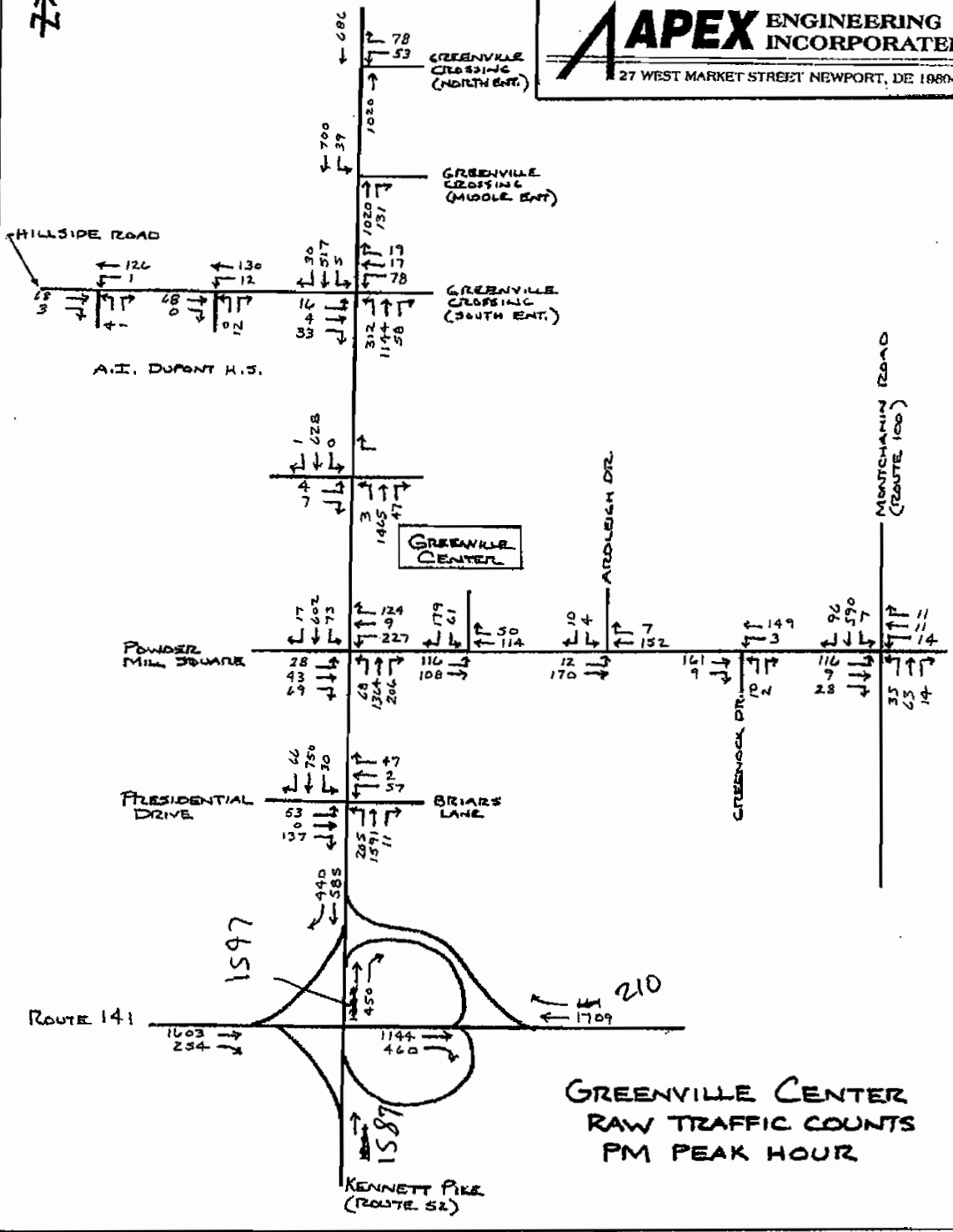
T. William Brockenbrough, Jr.  
 County Coordinator

TWB:tbm  
 Enclosure

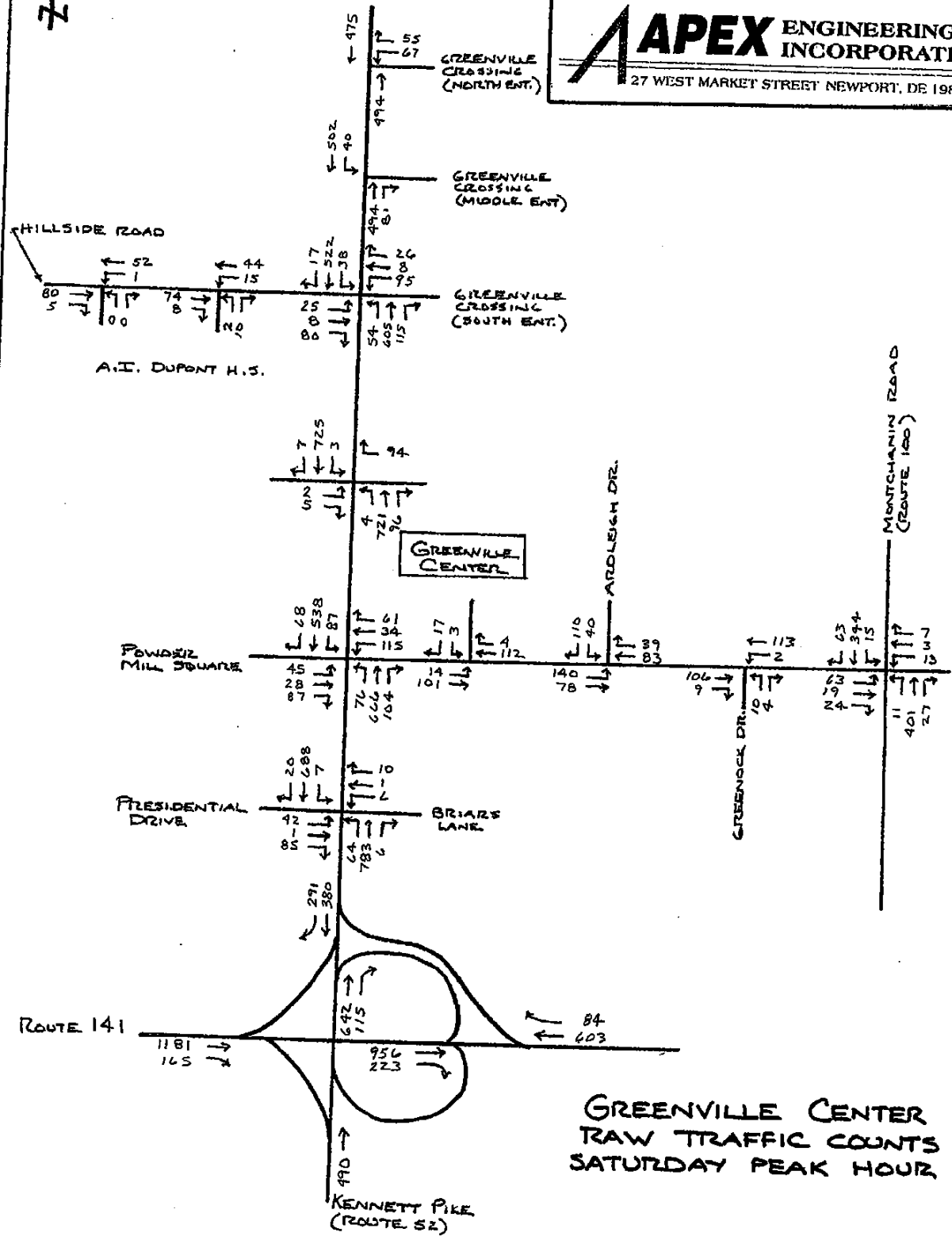
cc: Theodore Bishop, Assistant Director, Development Coordination  
 Todd J. Sammons, Project Engineer, Development Coordination  
 Troy Brestel, Project Engineer, Development Coordination  
 Andrew J. Parker, McCormick Taylor, Inc.











**GREENVILLE CENTER  
 RAW TRAFFIC COUNTS  
 SATURDAY PEAK HOUR**