

New Castle County, DE, Planning Board Meeting, July 1, 2008

RE: Barley Mill Plaza Expansion Proposal

Dear Ladies and Gentlemen:

Thank you for providing the opportunity to discuss this project. I am focusing my comments on traffic issues.

Three million square feet is immense. It would more than equal the size of the entire King of Prussia Mall complex, which has 2.8 million square feet of gross leasable space (Forbes.com, 2007) and is one of the nation's largest malls.

The sheer size of the proposed expansion would completely overwhelm the existing transportation infrastructure. It would draw workers and customers from throughout the region and from out of state. The proposed 731, 000 square feet of retail would attract out of state customers seeking tax free shopping.

Three million square feet of regional commercial should not be approached as a local transportation improvement project. Transportation studies should be comprehensive in scope, look beyond nearby intersections, and be done from a regional perspective.

The 141 corridor is mainly a commuter route for local and regional traffic. During the most recent Tyler McConnell Bridge expansion studies, it was well documented that SR141 attracts users from widespread outlying areas including Newark, Hockessin, and north Wilmington, and that the road is essentially a N-S bypass from I-95. Therefore, the transportation study should take into account traffic flowing onto SR141 from SR202 to Newport and I-95.

Realistically, all roads near the complex have undergone recent improvements and funding does not exist for further widenings. Nearby 2-lane local roads are already backed up during peak hours. The 2-lane Tyler McConnell Bridge (TMB) is LOS F, but will not be widened in the near future and has been removed from the WILMAPCO Transportation Improvement Program (TIP) due to lack of funds. Congested Lancaster Pike into Wilmington has no room for expansion.

The SR141 corridor is currently being improved from Faulkland to Kirkwood Highway, and the 141/100 intersection was recently widened through the TMB process. No more expansion work is anticipated for this roadway. And, there is little ROW to add capacity.

According to WILMAPCO, the segment of SR141 from SR 48 to SR 52 is at 92 percent of achieving full capacity (43,000 vehicles per day) and on the threshold of reaching LOS E. (It is now LOS D in this segment.) And, this is occurring when approximately 40% of the existing BMP buildings are vacant. If the full one million square feet were occupied, most likely SR 141 would reach LOS E today. Four thousand (4,000) additional vehicles per day would reach LOS F (WILMAPCO).

Pg. 2/July 1, 2008, NCC Planning Board, Barley Mill Plaza

Current traffic counts for nearby intersections are not available (they were last done between 1989 and 1999), but recent counts for nearby SR 48 and Centreville Road intersection were LOS E and D during AM and PM peaks respectively.

Given the existing transportation data and the potential addition of huge volumes of traffic from an expanded BMP, any review of this proposal should include:

- 1) Conduct a TOA and/or a TIS that reflects the far reaching impacts of the proposed development. Determine the carrying capacity of the current 141 corridor, something that will not change.
- 2) Have the study look regionally beyond local intersections, to I-95 in both directions, to Hockessin, to the Kennett Pike to PA for folks coming for tax free shopping, to the heavily traveled SR 100, and to the 2-lane TMB bottleneck.
- 3) Make LOS D the benchmark for the SR 141 corridor before it reaches Failing and becomes intolerable.
- 4) Based on the potential traffic impact of this project, at a minimum keep the scope of the development to what currently exists (1 million sq. ft.) and first fill up the 40% vacancy rate so there is a benchmark for the impact of one million square feet.
- 5) Increase the project's percentage of residential use to mirror adjacent land uses. Provide local – not regional - retail/office uses that encourage walkable community design.
- 6) Recognize that unlike Christiana Mall, which is only 1 million sq. ft., BMP does not have immediate access to major arterials and an interstate. SR 141 is not I-95.
- 7) Closely examine each proposed property use and compare them with the traffic they would generate throughout the day and evening and their impact on the existing roads.
- 8) Estimate the number of 18-wheeler trucks that would enter the project area to make deliveries to commercial uses and project their impact on roads and the environment.

The impact of this project is far reaching and most roads are close to LOS E or already at LOS F. How does the developer plan to squeeze into an already stressed system thousands of more vehicles every day plus all the delivery trucks needed to send supplies? Simply stated, from a traffic perspective, this proposal makes absolutely no sense. The fact it has been submitted is appalling.

Thank you.

Christy McEvelly, 909 Overbrook Road, Westover Hills-Woods. 302-656-8858

Cc-

Christopher Coons, New Castle County Executive

George Haggerty, NCC Department of Land Use

Robert Weiner, County Councilman

William Tansey, County Councilman

Ralph Reeb, DelDOT Director of Planning

Bill Brockenbrough, DelDOT Planning

Drew Boyce, DelDOT Project Development

Mark Tudor, DelDOT Project Development

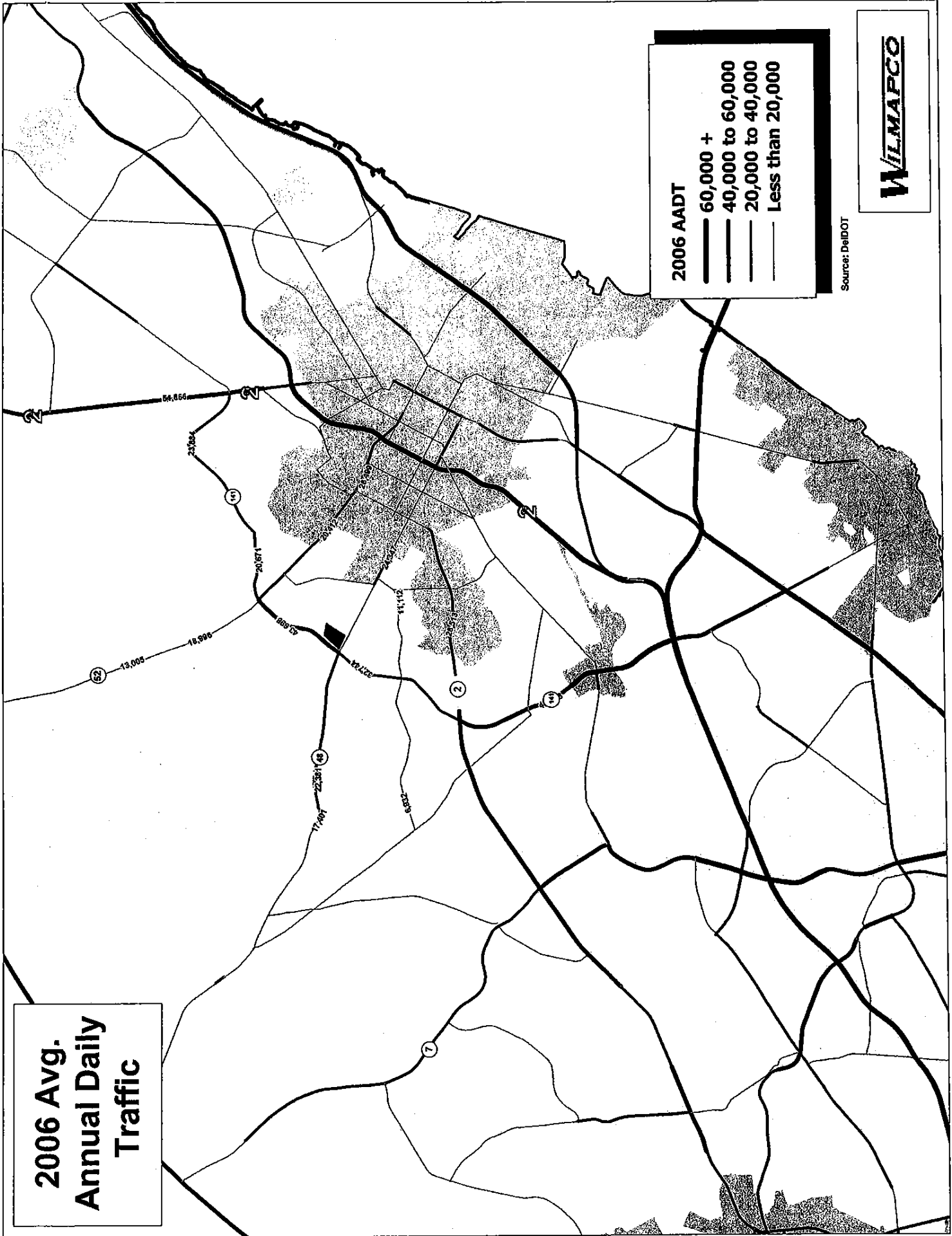
Tigist Zegeye, WILMAPCO Executive Director

Dan Blevins, WILMAPCO Planner

State Senator Charles Copeland

State Representative Deborah Hudson

2006 Avg. Annual Daily Traffic

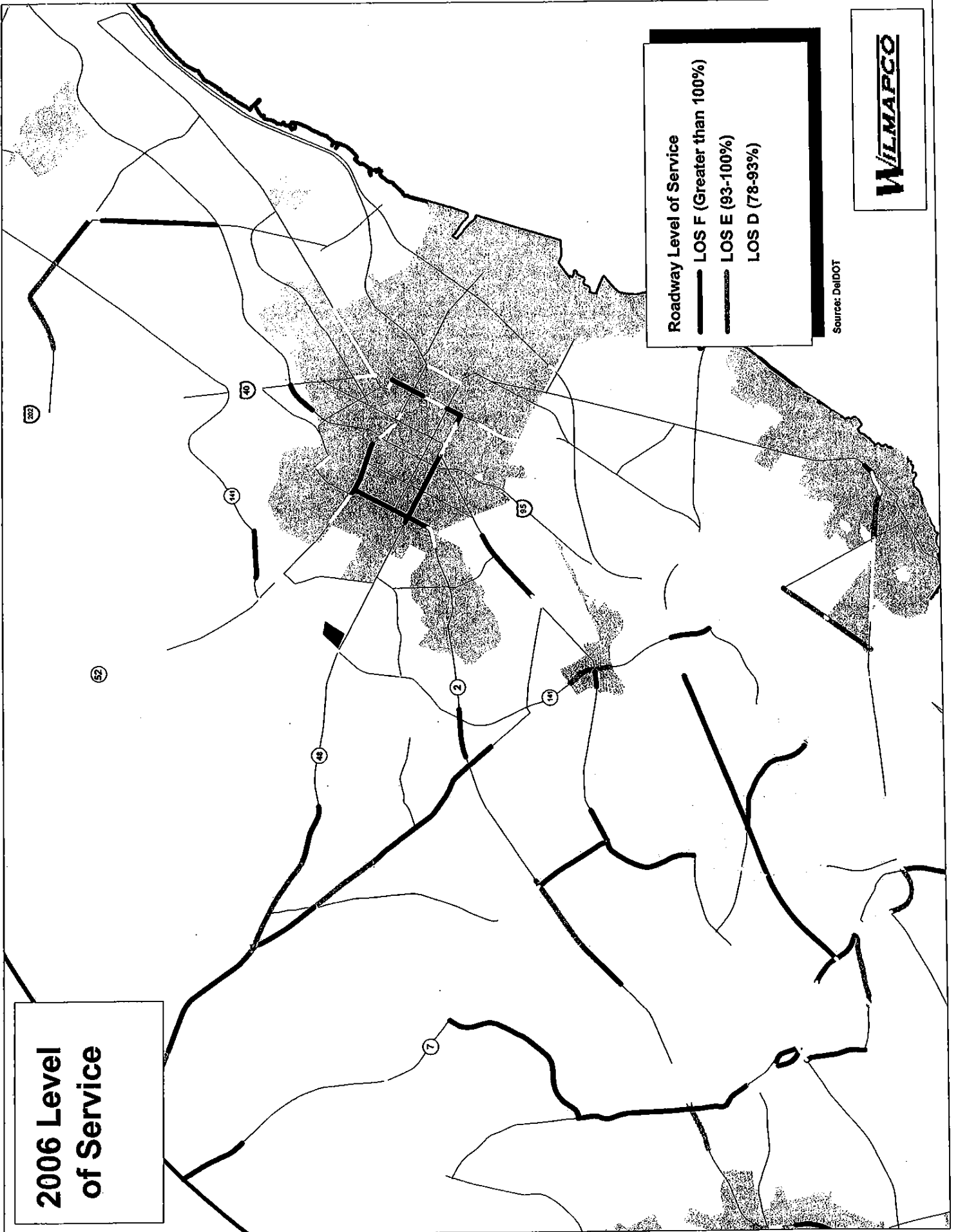


Source: DelDOT

Roadway Level of Service

- LOS F (Greater than 100%)
- LOS E (93-100%)
- LOS D (78-93%)

2006 Level of Service



John Bucksbaum, chief executive of General Growth Properties.

An acquisition spree begun in 1993 has increased his company's portfolio of shopping center properties to over to 200, with a market capitalization of approximately \$37 billion, from 22 centers and a \$1.2 billion market cap. An ambitious project that sums up GGP's vision is a massive redevelopment of the Natick Mall, a 40-year-old shopping center in suburban Boston. Longtime anchors Macy's and Sears aren't going anywhere,

but a major expansion will add two luxury condominium complexes and an upscale shopping area headlined by Neiman Marcus and Nordstrom.

Elsewhere, mixed-use "lifestyle centers," a creation of outdoor urban villages that mix retail theater and condos, are lining the map more and more. At Biltmore Fashion Park in Phoenix, Ariz., outdoor walkways, myriad restaurants and spas surround top retail names like Neiman Marcus and Gucci. And at The Oaks, originally a 1970s-era mall in Thousand

Oaks, Calif., near Los Angeles, a 1993 makeover helped it fit in with a planned suburb that includes growth areas like Simi Valley, Camarillo and Agoura Hills.

If the trend holds, say good-bye to the store-dominated mall, one where weary shoppers looking for a dining or amusement break are limited to the food court and the arcade room.

"It creates more density on the land you already own, which a lot of communities prefer to more urban sprawl," Bucksbaum says.

In Pictures: The World's 10 Largest Shopping Malls



King of Prussia Mall

Location: Philadelphia, Pennsylvania, USA

Year Opened: 1962

Gross Leasable Area: 2.8 million square feet

This product of the original U.S. mall building surge in the early 1960s still survives on the top 10 list, at least until the next big project goes up in Asia. Billing itself as the "premier shopping destination on the East Coast," this mall takes advantage of its location right off the Pennsylvania Turnpike to draw shoppers from New York, New Jersey and Maryland to its 400 stores. Despite a lack of theme parks and other modern amenities, package deals with Radisson Hotels and cross-marketing with nearby attractions like the Revolutionary War encampment at Valley Forge draw out-of-state shoppers looking to get away for a day or two.

(Photograph Courtesy of Chester County Conference Center and Visitors Bureau)

Posted from www.forbes.com with permission from Forbes.com LLC Copyright 2007. Forbes.com LLC. All rights reserved. For more information about reprints from Forbes.com contact Wright's Reprints at 877-652-5295 or at forbes@wrightsreprints.com.