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Apex Project No.: 00-104.013

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

Re: Greenville Shopping Center- Application No. 2008-0272-S
Response to Orth Rodgers & Associates ("ORA") Letter dated March 2, 2009

Dear Brad,

We were provided a copy of a letter prepared by Orth Rodgers & Associates, dated March 2, 2009, addressed to Mark Chura, Executive Director for Delaware Greenways ("Orth Rodgers Letter"), which is described as "an analysis of the "conceptual site plan for Greenville Center". The Orth Rodgers Letter contains a number of inaccuracies that need to be corrected, as follows:

1. Traffic Counts/Trip Generation:

- a. The weekday am and pm turning movement counts at the entrance to the Greenville Center ("GC") on DE Route 52 were performed on Tuesday, July 22, 2008. The weekday am and pm turning movement counts at the entrance to the GC on Buck Road were performed on Tuesday, May 2, 2006. The Orth Rodgers Letter states that the counts were performed on a Friday, which is not the case. As a certified DelDOT traffic consultant, ORA should know that DelDOT does not permit weekday peak hour traffic counts to be performed on Fridays. ORA should also know enough about the PETRAPro software program used to perform the counts to have been able to confirm the actual date of the counts.

ORA notes that 90% of the 453 vehicles entering and exiting the GC enter and exit from the Buck Road access. It is unclear as to where they derived this information since we could not verify the 90% number based on the raw data counts supplied by Tri-State Traffic Data, Inc., the contractor who performed the traffic counts.

- i. The Orth Rodgers Letter states that shopping centers typically generate more traffic on a Saturday than they do on a weekday peak. This is generally a true statement; however, nearly 50% of the GC consists of office space which is closed on weekends. For that reason, one would expect significantly less traffic at the GC on the weekend. For ORA to term the count data "suspicious" shows their total lack of knowledge of the existing and proposed uses at the GC and questions their ability to properly analyze the data.

- ii. The Orth Rodgers Letter notes that the distribution of traffic is usually the same for all peak hours. Again, this is true in many cases, however, since almost 50% of the GC gross floor area is office, which is not open for business on Saturday, the distribution of traffic is bound to be different on Saturday than it is on the weekday. Also, with the reduction of through movements on northbound Rt. 52 on the weekend, it is more likely that people would use the Rt. 52 entrance rather than the Buck Road entrance on a Saturday.
 - iii. Again, ORA makes reference to “during the Friday peak”, yet there were no counts performed on a Friday. The counts that were performed show that both entrances are used on weekdays as well as weekends. Any difference in the distribution is most likely attributable to the difference in traffic conditions on Route 52 during the weekday and Saturdays, and the significant reduction of trips to the site because the office uses are closed.
- b. The recommendation by ORA that the traffic count data be recollected is not necessary. Traffic counts were already performed for this Application on two different days, in 2006 and 2008 and the numbers were virtually identical.
 - c. The traffic count data has been explained in items a and b, above. The counts were not performed on a Friday, and the driveway split is not 90% vs. 10%. The differences between the traffic for the weekday peak hours and the traffic for the Saturday peak hours are the result of half of the gross floor area at the GC being closed on Saturday.
2. Buck Road Access:
- a. The throat of the Buck Road access to the GC has been in operation for several years without incident, complies with the Unified Development Code (“UDC”) and has been approved by DelDOT. This three way intersection has two stop conditions for the exiting movements, and a free movement (whether straight movement or left turning movement) for the entering traffic.
 - b. The proposed new square footage to the GC is 18,189sf of new retail/office space and 60,000 square feet of residential space consisting of 27 residential units. The additional trips from the residential units is negligible, and the additional 18,189 square feet of retail/office space would only generate 81 additional peak hour trips on the weekday and 110 on Saturday. This small amount of additional trips does not warrant a redesign of the Buck Road access.
 - c. The driveway throat has been operating adequately since its construction. Recent videos produced by the neighbors show the smooth operation of this access with the exiting traffic adhering to the traffic control devices.

3. Truck Loading:

- a. There are two loading docks located behind the Jansen's market, not one as stated in the Orth Rogers Letter. The timing of trucks entering and exiting the GC can sometimes overlap. In the videos produced by the neighbors, one truck stopped in the drive aisle when it could have pulled into the second loading dock. This issue can be avoided through proper direction to the vendors.
- b. The trucks maneuvering through the GC may cause a momentary delay to a patron's vehicle, but this does not mean that the site loading is not operating satisfactorily.
- c. The GC has been in operation since the 1970's. The maneuvering of the trucks is inevitable within an existing shopping center such as this; however, the current owners have made upgrades to the shopping center that have improved the loading conditions. With the proposed expansion, loading for the GC will be increased and improved.

4. Post Office:

- a. As ORA states, the post office is a convenience type operation and people will park as close to it as possible. This is true for all facilities as patrons generally park as close as they can. As part of this Application, the intent was to move the post office as far away from the busier part of the existing shopping center to an area where parking is currently underutilized. This will allow for the seldom-used parking spaces to be used for the post office.
- b. The drop box locations have yet to be shown on the plan, but it is anticipated that they will function where patrons can use them yet do not need to enter the post office.
- c. The size of the proposed post office does not require a loading dock. In addition, the post office has said it will no longer use this site as a distribution facility and, therefore, will only need small delivery vehicles to pick up and deliver mail.

5. Parking Supply/Parking Garage:

- a. The UDC promotes shared parking, especially in mixed-use centers. A shared parking analysis was performed for the various uses in the GC and approved by the Land Use Department. The parking garage is proposed to be located in the vicinity of the office space and residential uses. These uses tend to be more long term and used by patrons very familiar with the center and its uses. The majority of the surface parking is located in close proximity to the commercial uses where trips are shorter and parking is more visible.
- b. Parking will be designated for various uses as is currently being done in this center and consistent with common practice throughout New Castle County.

6. Route 52 Access:

- a. The proposal for a cross access easement between the GC and the Greenville Crossing Shopping Center has been discussed previously and explored, but to no avail. For a number of reasons, not the least of which is the current financing in place on the GC, this issue cannot be addressed at this time. However, a sidewalk network of brick pavers exists between the two centers along both sides of Kennett Pike. Most of the detractors of this Application have been touting the benefits of walkable access to the GC. If they would take advantage of the existing walking paths they could use their cars much less, save fuel, help the environment, and gain health benefits.
- b. The idea of a 90 degree intersection/entrance on Rt. 52 was discussed when the previous record plan for the addition of the space now containing the Jansen's market was being reviewed. The proposal was soundly rejected by the community and, therefore, the entrance was left as it was originally designed in the 1970's. Since the complex is operating satisfactorily at this time, and the Application calls for only 18,189sf of additional commercial/office square footage and 27 new residential units, I do not anticipate a significant increase in the overall trips entering and existing the GC. As a result, I do not recommend redesigning the entrance on Rt. 52 to permit left turns into the GC.

7. The Orth Rodgers Letter concludes by stating, "Given the magnitude of the above issues, site plan approval should be withheld until the issues are addressed . . .". This is a gross overstatement of the situation at the GC and is based upon incorrect assumptions and inaccurate data. The GC has been in operation for more than 30 years with the existing entrances in place and has done so quite successfully.

Sincerely,



Stephen G. Davies, P.E.
President

Cc: Keith Stoltz
Brad Coburn
Pam Scott
Dave Culver
Ralph Reeb
Ted Bishop
William Brockenbrough
Jeffrey L. Greene
Derrick Kennedy