

J. Thomas Goglia
January 11, 2021

Commissioners of the Planning and Zoning Commission of Sussex County
Planning & Zoning Office, PO Box 417
Georgetown, DE 19947

Mr. Jamie Whitehouse
Director of Planning and Zoning
Planning & Zoning Office, PO Box 417
Georgetown, DE 19947

Subject: Traffic Impact of Proposed Evans Farm Apartments development – CU#2206

Ladies and Gentlemen,

The Evans Farm Watch is group of over 400 and growing concerned residents of the area immediately surrounding the proposed Evans Farm Apartments development site at 31434 Railway Road, Ocean View. This parcel 134.12.00-74.00 is Docket No. CU# 2206.

This letter is the first in a five-part series of communications that you will be receiving addressing our major concerns related to the potential negative impact of this project to our Community.

First, to be clear, we do not deny this landowner the right to develop this parcel of land. However, we are very concerned that if built as proposed the negative impact on our community will be severe and permanent.

This letter specifically addresses the negative traffic impact that will occur as a result of the addition of this proposed development to our residential communities and the surrounding area.

Please consider this letter as a formal request that the Planning and Zoning Commission consider the following facts and **require** a comprehensive Traffic Impact Study (TIS) of the surrounding area before any further consideration of this project.

This area consisting of residents of numerous surrounding communities including Banks Acres, Banks Harbor, Bay Forest, Bethany Bay, Denton Manor, Denton Woods, Land of Pleasant Living, Ferris Courtyard, Mill Run Acres and Whites Creek Manor will be severely and negatively impacted by the size and scope of the Evans Farm Apartment Complex. The addition of 200 multi-family apartments, potentially 800 ± residents and 400 ± additional vehicles with the resultant daily traffic will exacerbate level of service issues on a road system that is already failing.

We believe the DelDOT Approval Letter for this project dated August 21st, 2019 fails for the following reasons...

1. The DelDOT Approval Letter Dated August 21st, 2019 utilized the 2018 Vehicle Volume Summary traffic counts as a basis for their decision. The ‘most recent’ traffic of the surrounding area counts for Old Mill and Railway Road in this document are severely outdated - 7-10 years old! Even using the 2019 Vehicle Volume Summary does not change the status (outdated) and volume counts of the traffic along these roads. As you can see from Table 1 below, Old Mill, Railway Road and the other well-traveled connected roads have not been counted since 2011, 2012 or 2014.

In addition, as residents of this area we feel strongly that Old Mill and Railway Road are not the only roads that will be severely impacted by the Evans Farm Apartments Development and that any new traffic studies should include the wider area – Irons Lane, Whites Neck, Railway, Clubhouse and Old Mill to Atlantic Ave.

Table 1 – 2019 Traffic Counts Sussex County Vehicle Volume Summary

Maint Road No.	Route Number or Road Name	End of Section Mileage	Beginning Point and Break Point Identifier	2019 AADT	Year Last Counted	Traffic Group
S 349	OLD MILL ROAD		WHITES NECK RD., RD.			
S 349	OLD MILL ROAD	0.98	WHITES NECK RD., RD.	1655	0	4
S 349	OLD MILL ROAD	1.66	RAILWAY RD	3825	11	4
S 349	OLD MILL ROAD	2.44	DEL. 26, RD. 26	2876	11	4
S 349A	CEDAR DRIVE	0.43	ATLANTIC AVE	4752	14	4
S 350	RAILWAY ROAD		OLD MILL RD			
S 350	RAILWAY ROAD	0.53	OLD MILL RD	1502	0	4
S 350	RAILWAY ROAD	1.34	DEAD END	3219	12	4
S 351	CLUB HOUSE ROAD		OLD MILL RD			
S 351	CLUB HOUSE ROAD	0.42	OLD MILL RD	1345	0	4
S 351	CLUB HOUSE ROAD	1.74	DEAD END	2747	12	4
S 348	IRONS LANE		OLD MILL RD., RD. 34			
S 348	IRONS LANE	0.49	OLD MILL RD., RD. 34	3165	0	4
S 348	IRONS LANE	2.35	IRONS LANE LANDING	4702	12	4
S 347	WHITES NECK ROAD	0.83	OLD MILL RD	1665	14	4
S 347	WHITES NECK ROAD	2.04	HOLTS LANDING RD., R	3992	12	4

*AADT – Average Annual Daily Traffic

When considering the age of these traffic counts, we ask you to consider what has changed in this area in the last 10 years.

- The **Bay Forest Community** enters/exits along Whites Neck road and intersects with Old Mill not a mile from the development property. A left turn onto Old Mill is the most direct and well-traveled route to the beach shopping, medical and other community businesses and services. Since 2011 Bay Forest has added 850 ± homes and now stands at 900±.
- The **Seagrove Community** entering/exiting to Irons Lane will have 120 ± homes when completed. Traveling east on Irons Lane to a right on Old Mill provides the most direct route to the beach, shopping, medical and other community businesses and services.

- The **Solitude Community**, a community of 117 ± homes enters/exits onto Clubhouse Road which directly feeds Old Mill and is the primary route to the beach, shopping, medical and other community businesses and services.
- **Bethany Bay**, a community of 550± residential homes exclusively utilizes Railway Road (which runs adjacent to the development property) to access Old Mill for access to the beach, shopping, medical and other community businesses and services.
- **Banks Acres, Denton Manor, Land of Pleasant Living** - communities totaling 275 ± homes - as well as other residents directly facing Railway utilize Railway Road as their primary access to Old Mill and Rte. 26 to access the beach, shopping, medical and other community businesses and services

Assuming 2 cars per household in the new communities, over 2,000 cars have been added to this area since 2011.

2. **Traffic Analysis:** In a 2008 Traffic Analysis Review conducted by DeIDOT’s own engineering contractor, McCormick Taylor, several observations and conclusions regarding a TIS completed in 2005, were detailed. McCormick Taylor’s letter dated March 10, 2008 describes a 2015 build scenario and contains the below highlighted comments. The Linder/Pettinaro approval subsequently obtained has since expired. However, conditions identified at the time have not been addressed and service level deficiencies still exist.

Table 2 - From DeIDOT - McCormick Taylor 2008 TIS Review

Based on our review, we have the following comments and recommendations:

The following intersections exhibit level of service deficiencies without the implementation of physical roadway and/or traffic control improvements:

<i>Intersection</i>	<i>Situation For Which Deficiency Occurs</i>
Delaware Route 26 and Delaware Route 17	2015 Saturday with and without development
Delaware Route 26 and Railway Road	2015 PM and Saturday with and without development
Delaware Route 26 and Old Mill Road	2015 PM and Saturday with and without development
Delaware Route 26 and Central Avenue (Sussex Road 84)	2015 PM and Saturday with and without development

*“This area has significant levels of seasonal traffic, particularly along the main roads. If this development is approved as currently proposed, the improvements required to achieve acceptable Levels of Service for Saturday conditions, at some of the intersections along Delaware Route 26 are beyond what is already planned for the SR 26, Atlantic Avenue, from Clarksville to Assawoman Canal project. **These additional capacity improvements will likely be infeasible based on physical limitations, right-of-way constraints, and public opposition.**”*

The conditions mentioned in the table above as well as others mentioned in *Table 1* continue to be a burden on our community despite the fact this development project has not moved forward. The SR 26 improvement project from Atlantic Avenue, from Clarksville to Assawoman Canal project is complete

- 3. Current Road Conditions:** County roads around the proposed Evans Farm Development are narrow, two-way local roads, without sidewalks or shoulders for bicycle/pedestrian paths. There are drainage ditch issues along both Railway and Old Mill that add further flooding hazards during heavy rains. The consensus of local residents is that these are hazardous roads and intersections, and it is only “a matter of time until someone is killed or seriously injured.” Of the five Rte. 26/Atlantic Ave access roads listed in Table 1, only one is controlled by traffic signal. A check of the DelDOT project portal reveals no active projects for additional traffic signals along Rte. 26 nor improvements to any of these side roads.

It is a common occurrence for vehicles entering Old Mill from Atlantic Ave. negotiating this blind curve to encounter pedestrians, cyclists and this handicapped, scooter riding gentleman who lives nearby.

Photograph 1: Entering Blind Curve on Old Mill near Atlantic Ave.



Photograph 2: Exiting Blind Curve - Handicapped Scooter Rider on Old Mill



Adding the proposed additional traffic burden will heighten the danger and increase the risk of serious injury to all who travel these roads.

Finally, The use of these roads as feeder roads to Rte. 26 as an evacuation route during a hurricane or other evacuation emergency would be not be viable.

4. Walkability and Public Transportation

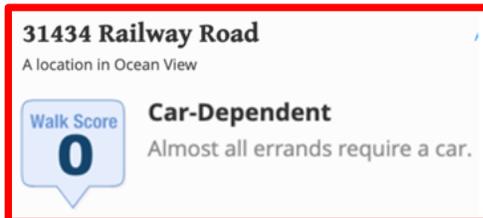
As you consider what we have identified above, also please consider two additional factors that may negatively impact any ‘standard’ units of measurement for evaluating traffic volume.

- a. The **Walkability Score**, a metric utilized by the real estate industry to help buyers evaluate their walking access to shopping and other needed services in their communities.

The Walking Score of the proposed Evans Farm Apartments at 31434 Railway Road is 0, which assures that residents will be forced to utilize their vehicles for everyday transportation needs.

Illustration 1: Walkability Metric

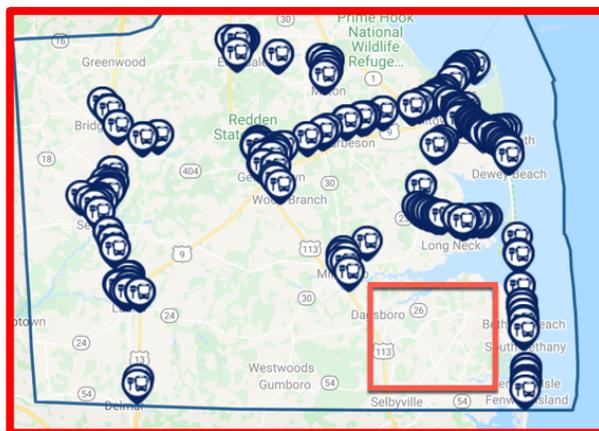
<https://www.walkscore.com/score/31434-railway-rd-ocean-view-de-19970>



- b. **Public Transportation** does not exist in the immediate area of this development.

Illustration 2: Dart Bus Stop Map

Evans Farm is inside Red Square



These two factors will require a higher usage of automobiles – potentially another 400 vehicles - for the residents of Evans Farm Apartments than would normally apply in other more appropriate areas for a high-density development.

In Summary, given what has been researched, summarized and presented here we are petitioning you as Commissioners and Councilpersons - stewards of this desirable community we enjoy - to exercise your authority to **require** a new Traffic Impact Study. The scope of the study should be large enough to address not only the roads directly adjacent to the development property but those in the areas of concern expressed herein. We request that further consideration of this Development application be deferred until such a study can be completed and its findings evaluated.

Of note, DeDOT’s letter of August 21st, 2019 recommends a TIS.

“ Because of this impact, we recommend that the applicant be required to perform a Traffic Impact Study (TIS) for the subject application.”

We appreciate your diligent attention to this matter and hold an expectation that you will act in the best interest of your constituents and our community.

Sincerely,

Tom Goglia
Bay Forest Resident,
Member of
The Evans Farm Watch

CC: Lauren DeVore, MSM
Planner III
Sussex County Planning and Zoning Commission