



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

SHANTÉ A. HASTINGS
SECRETARY

August 3, 2026

Dawn M. Riggi, P.E.
Davis, Bowen & Friedel, Inc.
1 Park Avenue
Milford, DE 19963

Dear Ms. Riggi,

The enclosed Traffic Impact Study (TIS) review letter for the **White's Farm** (Tax Parcel: 133-15.00-30.01) residential development has been completed under the responsible charge of a registered professional engineer whose firm is authorized to work in the State of Delaware. They have found the TIS to conform to DelDOT's Development Coordination Manual and other accepted practices and procedures for such studies. DelDOT accepts this letter and concurs with the recommendations. If you have any questions concerning this letter or the enclosed review letter, please contact me at Annamaria.Furmato@delaware.gov.

Sincerely,

Annamaria Furmato
TIS Review Engineer

AF:lw

Enclosures

cc with enclosures: Christian Hudson, White Farm LLC
Jamie Sechler, Davis, Bowen & Friedel, Inc.
David L. Edgell, Office of State Planning Coordination
Jamie Whitehouse, Sussex County Planning & Zoning
Mir Wahed, Johnson, Mirmiran, & Thompson, Inc.
Joanne M. Arellano, Johnson, Mirmiran, & Thompson, Inc.
DelDOT Distribution

DelDOT Distribution

Mark Luszcz, Chief Engineer, Transportation Solutions (DOTS)
Brad Eaby, Deputy Attorney General, DOTS
Michael Simmons, Chief Project Development South, DOTS
Peter Haag, Chief Traffic Engineer, DOTS
Wendy Carpenter, Traffic Calming & Subdivision Relations Manager, Traffic, DOTS
Alistair Probert, South District Engineer, M&O
Jared Kauffman, Service Development Planner, DTC
Anthony Aglio, Planning Supervisor, Active Transportation & Community Connections, Planning
Austin Gray, Assistant Director, Statewide & Regional Planning, Planning
Anson Gock, Planner, Statewide & Regional Planning, Planning
Jeff Van Horn, Director, Economic Development Coordination (EDC)
Matt Schlitter, South District Public Works Engineer, EDC
Brian Yates, Process and Quality Control Engineer, EDC
Wendy Polasko, Assistant Director, Development Coordination, EDC
Randhir Sharma, Subdivision Engineer, Development Coordination, EDC
Kevin Hickman, Acting Sussex Review Coordinator, Development Coordination, EDC
Jose Quixtan, Sussex Review Engineer, Development Coordination, EDC
Sireen Muhtaseb, TIS Engineer, Development Coordination, EDC
Ben Fisher, TIS Review Engineer, Development Coordination, EDC



July 31, 2026

Ms. Sireen Muhtaseb, P.E.
TIS Group Manager
Delaware Department of Transportation
Development Coordination
800 Bay Road
Dover, DE 19901

RE: Agreement No: 2138S
TIS Support Services – T202369005
Task Name: Task 1-4 White's Farm
JMT No.: 24-01365-104

Dear Ms. Muhtaseb:

Johnson, Mirmiran, and Thompson (JMT) has completed a review of the Traffic Impact Study (TIS) and the TIS Addendum for the White's Farm development, which was prepared by Davis, Bowen & Friedel, Inc. dated March 2025 and April 1, 2026, respectively. This review was assigned as Task Number 1-4. The report is prepared in a manner generally consistent with DelDOT's *Development Coordination Manual* and other Department standards.

The original March 2025 Final TIS report proposed an access at the intersection of Cross Keys Road (Sussex Road 432) and Lakeview Road (Sussex Road 412) and an additional access at the intersection of Cedar Ridge Drive and Godwin School Road (Sussex Road 410). As part of the entrance construction, Godwin School Road between Cedar Ridge Drive and Delaware Route 20 (Sussex Road 20) would be realigned approximately 430 feet to the east.

Since that report, the proposed access has been modified. As a result, the TIS Addendum proposes only an access at the intersection of Cross Keys Road and Lakeview Road and removes the consideration for an access at the intersection of Godwin School Road and Cedar Ridge Drive. The proposed realignment of Godwin School Road is also no longer proposed.

The TIS evaluates the impacts of a proposed residential development in the Town of Millsboro, Sussex County, Delaware. The residential development would consist of 220 single-family detached houses and the land is located on the south side of Delaware Route 20, between the intersections of Cross Keys Road and Godwin School Road. The June 29, 2023 DelDOT Scoping Meeting Memorandum indicated the development to be 265 single-family detached housing and the development size has been modified within the TIS. The Site Map on Page 9 depicts the location. Construction is anticipated to be completed in 2031.



Relevant and On-Going Projects and Studies

DelDOT has relevant and on-going improvement projects in the vicinity of the study area. DelDOT has the *Corridor Capacity Preservation Program* (CCPP), which aims to maintain the regional importance and preserve the intended function and capacity of existing designated transportation routes within the Program. The main objectives of the program are listed below:

- Prevent the need to build an entirely new road
- Minimize the transportation impacts of increased economic growth
- Maintain an existing road's ability to handle traffic efficiently and safely
- Preserve the ability to make future improvements
- Sort local and through traffic

US Route 113 is one of the highways included in the CCPP and the US 113 North/South Study was performed to examine improvements along US Route 113 from north of Milford to the Maryland state line in Selbyville. More information regarding the CCPP can be found at https://deldot.gov/Programs/corr_cap/index.shtml.

The *North Millsboro Bypass, US 113 to SR 24* project aims to improve safety and reduce congestion through the Town of Millsboro. The project is split into two projects consisting of the grade separation of the intersection of US Route 113 and Delaware Route 20 (Hardscrabble Road) (DelDOT Contract No. T20211702) and a two-lane connector road between US Route 113 and Delaware Route 24 north of Millsboro (DelDOT Contract No. T202112701). Construction has been completed. The improvements associated with the grade separation of US Route 113 and Delaware Route 20 impact the TIS study intersections of Delaware Route 20 with Sheep Pen Road (Sussex Road 328) and Country Living Road. More details, including concept plans for this project, are available at the following link: <https://deldot.gov/projects/index.shtml?dc=details&projectNumber=T201912701>.

The *SR 20 Intersections Improvements* DelDOT project includes the installation of roundabouts at the Delaware Route 20 intersections with Shortly Road / Conaway Road, Cross Keys Road / Governor Stockley Road, East Trap Pond Road, and Beaver Dam Road. Design funding is scheduled for Fiscal Year 2027. The construction start date is unknown at this time.

Summary of Analysis Results

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

The following intersection exhibits level of service (LOS) deficiencies without the implementation of physical roadway and/or traffic control improvements.



Intersection	LOS Deficiencies Occur			Case
	Weekday AM	Weekday PM	Summer Saturday	
5 - Delaware Route 20 / Sheep Pen Road (Sussex Road 328)	-	X	-	Case 2 – 2031 without Development
	-	X	-	Case 3 – 2031 with Development
6 - Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road	X	-	-	Case 2 – 2031 without Development
	X	X	-	Case 3 – 2031 with Development

5 - Delaware Route 20 / Sheep Pen Road (Sussex Road 328) (See Table 6, Page 23)

As part of the *US 113 at SR 20 Grade Separated Intersection* project (DelDOT Contract No. T202112702), the northbound Sheep Pen Road approach to Delaware Route 20 was relocated approximately 350 feet to the west. The southbound Sheep Pen Road approach remained in its existing location along Delaware Route 20. With these improvements, the northbound Sheep Pen Road left turn movement would operate with capacity constraints with or without the proposed White's Farm development. Specifically, the northbound Sheep Pen Road left turn would operate at LOS F with a delay of approximately 60 seconds of delay per vehicle and a calculated 95th percentile queue length of approximately 15 feet under Case 3 conditions. As improvements at the intersection have been constructed as part of the DelDOT *US 113 at SR 20 Grade Separated Intersection*, it is not recommended that additional improvements be implemented by the developer. Also, with the modification of the access configuration, this intersection would be outside the scope of this TIS.

6 - Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road (See Table 7, Page 24, Development Improvement #3)

The all-way stop-controlled intersection of Delaware Route 20 with Governor Stockley Road and Cross Keys Road would exhibit LOS deficiencies along the eastbound Delaware Route 20 approach during the AM peak hour under future conditions with and without the development and during the PM peak hour with the development. LOS deficiencies would also occur along the westbound Delaware Route 20 approach during the PM peak hour under future conditions with the development. Specifically, under Case 3 conditions during the AM peak hour, the eastbound Delaware Route 20 approach would operate at LOS F with a delay of approximately 110 seconds per vehicle and a calculated 95th percentile queue length of approximately 553 feet. In addition, under Case 3 conditions during the PM peak hour, the eastbound Delaware Route 20 approach would operate at LOS F with a delay of approximately 56 seconds per vehicle and a calculated 95th percentile queue length of approximately 303 feet. Moreover, under Case 3 conditions during the PM peak hour, the westbound Delaware Route 20 approach would operate at LOS E with a delay of approximately 96 seconds per vehicle and a calculated 95th percentile queue length of approximately 450 feet.



The *SR 20 Intersections Improvements* DelDOT project includes the installation of a roundabout at the Delaware Route 20 intersection with Cross Keys Road / Governor Stockley Road. The deficiencies would be mitigated with the installation of the roundabout. Specifically, the LOS would improve to operate at LOS A and the 95th percentile queue lengths along the eastbound and westbound Delaware Route 20 approaches would reduce to less than approximately 90 feet. As the improvements would mitigate the LOS deficiencies, it is recommended that the developer make an equitable contribution to the DelDOT Project.

Additional Intersection Improvements

2 - Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412) (See Table 3, Page 19, Development Improvement #2)

The existing Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412) intersection is a three-legged two-way stop-controlled intersection. As part of the proposed development, a fourth leg would be constructed that would serve as a site entrance. The existing intersection is stop-controlled along the Cross Keys Road northbound approach. Although the intersection is not expected to experience LOS deficiencies during peak hours under future conditions both with and without the proposed development as a two-way stop-controlled intersection, there may be sight distance constraints due to the alignment of Cross Keys Road with vehicles executing turning movements out of the Site Entrance B approach. As an alternative to two-way stop control, the TIS recommended the implementation of all-way stop control. With all-way stop control, the intersection would operate at acceptable LOS.

JMT performed an all-way stop control study based on criteria within the DE MUTCD. The study indicated that DE MUTCD criteria based on crash data and traffic volumes would not be met for all-way stop control. As such, with the potential sight distance constraints along the Site Entrance B approach and that a roundabout is also proposed by DelDOT at the Delaware Route 20 and Governor Stockley Road/Cross Keys Road intersection, a roundabout is recommended to be installed by the developer at the intersection of Site Entrance B with Cross Keys Road and Lakeview Road.

Development Improvements

Should the Town of Millsboro approve the proposed development, the following items should be incorporated into the site design and reflected on the record plan, entrance plans, or construction plans by note or illustration unless a Design Deviation is requested and approved by the Department. All applicable agreements (i.e., letter agreements for off-site improvements and traffic signal agreements) should be executed prior to entrance plan approval for the proposed development. The following items should be implemented at the same time as site construction once all agency approvals and permits are secured and completed in accordance with DelDOT's Standards and Specifications.

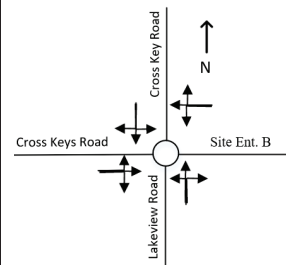
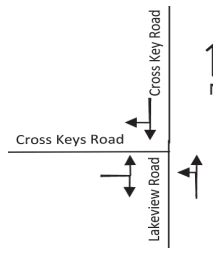
1. The developer shall improve the State-maintained roads on which they front (Delaware Route 20, Godwin School Road, Cross Keys Road, and Lakeview Road) within the limits of their



frontage. The improvements shall include both directions of travel, regardless of whether the developer's lands are on one or both sides of the road. "Frontage" means the length along the state right-of-way of a single property tract where an entrance is proposed or required. If a single property tract has frontage along multiple roadways, any segment of roadway including an entrance shall be improved to meet DelDOT's Functional Classification criteria as found in Section 1.1 of the Development Coordination Manual and elsewhere therein, and/or improvements established in the Traffic Operational Analysis and/or Traffic Impact Study. "Secondary Frontage" means the length along the state right-of-way of a single property tract where no entrance is proposed or required. The segment of roadway may be upgraded by improving the pavement condition of the existing roadway width. The Pavement Management Section and Subdivision Section will determine the requirements to improve the pavement condition.

- The developer should construct a single lane roundabout at the intersection of Site Entrance B with Lakeview Road and Cross Keys Road. The developer should coordinate with DelDOT's Development Coordination Section to determine details regarding design, schedule, and construction of the roundabout. The intersection should be designed to be consistent with the lane configurations indicated in the table below:

Approach	Current Configuration	Approach	Proposed Configuration
Eastbound Cross Keys Road	One shared left turn/right turn lane	Eastbound Cross Keys Road	One shared left turn/through/right turn lane
Westbound Site Entrance B	Does not exist	Westbound Site Entrance B	One shared left turn/through/right turn lane
Northbound Lakeview Road	One shared left turn/through lane	Northbound Lakeview Road	One shared left turn/through/right turn lane
Southbound Cross Keys Road	One shared through/right turn lane	Southbound Cross Keys Road	One shared left turn/through/right turn lane



- The developer should provide DelDOT an equitable cost contribution towards a future DelDOT project for the roundabout proposed at the study intersection of Delaware Route 20 and Governor Stockley Road/Cross Keys Road. The cost contribution is \$117,060.00.



4. The following bicycle, pedestrian, and transit improvements should be included:
 - a. A minimum fifteen-foot-wide permanent easement from the edge of the right-of-way should be dedicated to DelDOT along the Cross Keys Road, Lakeview Road, and Godwin School Road frontage. Along the frontage, the developer should construct a ten-foot-wide shared use path (SUP). The SUP should be designed to meet current AASHTO and ADA standards. A minimum five-foot setback should be maintained from the edge of the pavement to the SUP. The developer should coordinate with DelDOT's Development Coordination Section during the plan review process to identify the exact location of the SUP.
 - b. Internal connections from the frontage SUP into the site are required.
 - c. ADA-compliant curb ramps and marked crosswalks should be provided along the site entrances.

Please note that this review generally focuses on capacity and level of service issues; additional safety, operational, and constructability issues will be further addressed through DelDOT's Plan Review process.

Improvements in this TIS may be considered "significant" under DelDOT's Work Zone Safety and Mobility Procedures and Guidelines. These guidelines are available on DelDOT's website at https://www.deldot.gov/Publications/manuals/de_mutcd/index.shtml.

Additional details on our review of the TIS are attached. Please contact me at (302) 266-9600 if you have any questions concerning this review.

Sincerely,
Johnson, Mirmiran, and Thompson, Inc.

A handwritten signature in black ink, appearing to read 'Joanne M. Arellano'.

Joanne M. Arellano, P.E., PTOE

cc: Annamaria Fumato, EIT
Mir Wahed, P.E., PTOE
Tanner Chiamprasert, EIT
Enclosure

Recommendations Map



General Information

Report date: March 2025 (TIS) & April 1, 2026 (Addendum)

Prepared by: Davis, Bowen & Friedel, Inc.

Prepared for: White Farm LLC

Tax parcel: 133-15.00-30.01

Generally consistent with DelDOT's Development Coordination Manual (DCM): Yes

Project Description and Background

Description: The proposed development consists of 220 single-family detached housing. The June 29, 2023 DelDOT Scoping Meeting Memorandum indicated the development to be 265 single-family detached housing and the development size has been modified within the TIS.

Location: The site is located on the south side of Delaware Route 20 (Sussex Road 20), between the intersections of Cross Keys Road (Sussex Road 432) and Godwin School Road (Sussex Road 410), in the Town of Millsboro.

Amount of land to be developed: An approximately 82.21-acre parcel.

Land use approval(s) needed: Entrance Plan.

Proposed completion date: 2031.

Proposed access locations: One proposed full access at the intersection of Cross Keys Road and Lakeview Road (Sussex Road 412).

Daily traffic volumes:

- 2023 Average Annual Daily Traffic (AADT)
 - Cross Keys Road (Sussex Road 432): 1,564 vehicles per day
 - Lakeview Road (Sussex Road 412): 1,120 vehicles per day
 - Godwin School Road (Sussex Road 410): 1,433 vehicles per day
 - Delaware Route 20 (Sussex Road 020): 6,380 vehicles per day.

*AADT is sourced from DelDOT Gateway and per ATR count data from 06/06/2023 to 6/16/2023.

Site Map



**Graphic is an approximation based on the Overview plan prepared by Davis Bowen & Friedel Inc. for White's Farm, dated January 2025.*

Relevant and On-going Projects

DelDOT has relevant and on-going improvement projects in the vicinity of the study area. DelDOT has the *Corridor Capacity Preservation Program (CCPP)*, which aims to maintain the regional importance and preserve the intended function and capacity of existing designated transportation routes within the Program. The main objectives of the program are listed below:

- Prevent the need to build an entirely new road
- Minimize the transportation impacts of increased economic growth
- Maintain an existing road's ability to handle traffic efficiently and safely
- Preserve the ability to make future improvements
- Sort local and through traffic

US Route 113 is one of the highways included in the CCPP and the US 113 North/South Study was performed to examine improvements along US Route 113 from north of Milford to the Maryland state line in Selbyville. More information regarding the CCPP can be found at https://deldot.gov/Programs/corr_cap/index.shtml.

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The *SR 20 Intersections Improvements* DelDOT project includes the installation of roundabouts at the Delaware Route 20 intersections with Shortly Road / Conaway Road, Cross Keys Road / Governor Stockley Road, East Trap Pond Road, and Beaver Dam Road. Design funding is scheduled for Fiscal Year 2027. The construction start date is unknown at this time.

Livable Delaware

(Source: Delaware Strategies for State Policies and Spending, 2025)

Location with respect to the Strategies for State Policies and Spending Map of Delaware:

The proposed development is located within Investment Level 3.

Investment Level 3

Investment Level 3 Areas generally fall into two categories. The first category covers lands that are in the long-term growth plans of counties or municipalities where development is not necessary to accommodate expected population growth during a five-year planning period (or longer). In these instances, development in Investment Level 3 may be least appropriate for new growth and development in the near term. The second category includes lands that are adjacent to or intermingled with fast-growing areas within counties or municipalities that are otherwise categorized as Investment Levels 1 or 2. Environmentally sensitive features, agricultural-preservation issues, or other infrastructure issues most often impact these lands. In these instances, development and growth may be appropriate in the near term, but the resources on the site and in the surrounding area should be carefully considered and accommodated by state agencies and local government with land-use authority. Investment Level 3 is further characterized by areas with new development separated from existing development by a substantial amount of vacant land that is not contiguous with existing infrastructure, areas that are experiencing some development pressure, areas with existing but disconnected development, and possible lack of adequate infrastructure.

The state will consider investing in infrastructure within Investment Level 3 Areas once the Investment Level 1 and 2 Areas are substantially built out, or when the infrastructure or facilities are logical extensions of existing systems and deemed appropriate to serve a particular area. The priorities in the Level 3 Areas are for DelDOT to focus on regional movements between towns and other population centers. DelDOT also supports the development and implementation of Transportation Improvement Districts in Investment Level 3 areas. Local roadway improvements will be made by developers and property owners as development occurs. Lower priority is given to transportation system–capacity improvements and transit-system enhancements.

Level 3 Areas are ideal for new development separated from existing development by a substantial amount of vacant land that is not contiguous with existing infrastructure, areas that are experiencing some development pressure, areas with existing but disconnected development, and possible lack of adequate infrastructure. Priorities for Level 3 include: for DelDOT to focus on regional movements between town and other population centers, for DelDOT to support the development and implementation of Transportation Improvement Districts, and for local roadways improvements to be made by developers and property owners as development occurs.

Proposed development’s compatibility with Livable Delaware:

The proposed development is located within Investment Level 3 and is adjacent to Investment Level 2. Per the *Delaware Strategies for State Policies and Spending*, development and growth may be appropriate for areas adjacent to Investment Levels 1 or 2. Therefore, the proposed development is consistent with the 2025 update of *Livable Delaware Strategies for State Policies and Spending*.

Comprehensive Plan

(Source: *Town of Millsboro Comprehensive Plan, 2021*)

Town of Millsboro Comprehensive Plan:

Per the Town of Millsboro Comprehensive Plan Existing Land Use Map, the proposed development is currently zoned as Agricultural. Per the Town of Millsboro Comprehensive Plan Future Land Use Map, the development is zoned as Residential.

Proposed development’s compatibility with the Town of Millsboro Comprehensive Plan:

The *Town of Millsboro Comprehensive Plan* states that the residential zoning is a land use that recognizes the space needs of residential activities. Therefore, the development is generally consistent with the residential land use plan of the *Town of Millsboro Comprehensive Plan*.

Trip Generation

The trip generation for the proposed development was determined by using the comparable land use and rates/equations contained in the *Trip Generation, 11th Edition: An ITE Informational Report*, published by the Institute of Transportation Engineers (ITE) for ITE Land Use Code 220 (Single-Family Detached Houses).

Table 1
White's Farm Trip Generation

Land Use	ADT	Weekday AM Peak Hour			Weekday PM Peak Hour			Saturday		
		Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
220 Single-Family Detached Houses (ITE LUC 210)	2,084	38	115	153	132	77	209	107	92	199

Trip generation was reviewed by DelDOT as part of the Preliminary TIS (PTIS) submission.

Overview of TIS

Intersections examined:

1. Site Entrance A / Godwin School Road (Sussex Road 410) / Cedar Ridge Drive
2. Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412)
3. Delaware Route 20 / Godwin School Road
4. Delaware Route 20 / Country Living Road (Sussex Road 433)
5. Delaware Route 20 / Sheep Pen Road (Sussex Road 328)
6. Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road

Conditions examined:

1. Case 1 – 2023 existing
2. Case 2 – 2031 without development
3. Case 3 – 2031 with development

Committed developments considered:

1. **TidalHealth Millsboro Medical Campus:** 150,000 square-foot hospital.
2. **Sussex Central School:** 2,200-student high school, an 850-student middle school proposed to use the existing high school building per approved entrance plans.
3. **Plantation Lakes:** (2,494 residential units consisting of 967 single-family detached houses and 1,527 low-rise multi-family units, and a 9-hole golf course) [554 single family detached houses, 834 townhouses, and 9-hole golf course occupied]
4. **Somerton Chase** (214 single-family detached houses per approved Entrance Plans)
5. **Alderleaf Meadows:** 122 single-family detached houses, 64 townhouses.
6. **Patriot's Bluff:** 248 single-family detached houses, 314 villas / low-rise multi-family housing, and 271 townhomes / low-rise multi-family housing.
7. **Preston Millsboro:** 66,250 square feet of car dealership space and a 7,200 square-foot / one tunnel car-wash.

The committed development information contained within the TIS report supersedes the June 29, 2023, Scoping Meeting Memorandum.

Peak hours evaluated: Weekday morning, weekday evening, and summer Saturday midday peak hours.

Intersection Descriptions

1. **Site Entrance A / Godwin School Road (Sussex Road 410)/ Cedar Ridge Drive**
Type of Control: Existing two-way stop-controlled (T-intersection), proposed all-way stop-controlled intersection (Four-legged).
Eastbound Approach: (Cedar Ridge Drive) Existing one stop-controlled shared left turn/right turn lane. Proposed one shared left turn/through/right turn lane.
Westbound Approach: (Godwin School Road) Existing does not exist. Proposed one shared left turn/through/right turn lane.
Northbound Approach: (Godwin School Road) Existing one shared left turn/through lane. Proposed one shared left turn/through/right turn lane.
Southbound Approach: (Site Entrance A) Proposed one shared left turn/through/right turn lane.

2. **Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412)**
Type of Control: Existing two-way stop-controlled (T-intersection), proposed all-way stop-controlled intersection (Four-legged).
Eastbound Approach: (Cross Keys Road) Existing one stop-controlled shared left turn/right turn lane. Proposed one shared left turn/through/right turn lane.
Westbound Approach: (Site Entrance B) Proposed one stop-controlled shared left turn/through/right turn lane.
Northbound Approach: (Lakeview Road) Existing one shared left turn/through lane. Proposed one shared left turn/through/right turn lane.
Southbound Approach: (Cross Keys Road) Existing one shared through/right turn lane. Proposed one shared left turn/through/right turn lane.

3. **Delaware Route 20 / Godwin School Road**
Type of Control: Existing stop-controlled intersection (T-intersection).
Eastbound Approach: (Delaware Route 20) Existing one through/right turn lane.
Westbound Approach: (Delaware Route 20) Existing one left turn/through lane.
Northbound Approach: (Godwin School Road) Existing one stop-controlled left turn/right turn lane.

4. **Delaware Route 20 / Country Living Road (Sussex Road 433)**
Type of Control: Existing stop-controlled intersection (T-intersection).
Eastbound Approach: (Delaware Route 20) Existing one through/right turn lane.
Westbound Approach: (Delaware Route 20) Existing one left turn/through lane.

Northbound Approach: (Country Living Road) Existing one stop-controlled left turn/right turn lane.

5. **Delaware Route 20 / Sheep Pen Road (Sussex Road 328)**

Type of Control: Existing two-way stop-controlled intersection (Four-legged).

Eastbound Approach: (Delaware Route 20) Existing one left turn/through/right turn lane.

Westbound Approach: (Delaware Route 20) Existing one left turn/through/right turn lane.

Northbound Approach: (Sheep Pen Road) Existing one stop-controlled shared left turn/through/right turn lane.

Southbound Approach: (Sheep Pen Road) Existing one stop-controlled shared left turn/through/right turn lane.

**As part of the US 113 at SR 20 Grade Separated Intersection project (DelDOT Contract No. T202112702), the northbound Sheep Pen Road approach to Delaware Route 20 was relocated approximately 350 feet to the west. The southbound Sheep Pen Road approach remained in its existing location along Delaware Route 20.*

6. **Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road**

Type of Control: Existing all-way stop-controlled intersection.

Eastbound Approach: (Delaware Route 20) Existing one stop-controlled shared left turn/through/right turn lane.

Westbound Approach: (Delaware Route 20) Existing one stop-controlled shared left turn/through/right turn lane.

Northbound Approach: (Cross Keys Road) Existing one stop-controlled shared left turn/through/right turn lane.

Southbound Approach: (Governor Stockley Road) Existing one stop-controlled shared left turn/through/right turn lane.

Transit, Pedestrian, and Bicycle Facilities

Existing transit service: Per DelDOT Gateway, there are no DART Routes within the vicinity of the site.

Planned transit service: Per email correspondence from Mr. Bill Williamson, DART Fixed-Route Planner, on March 13, 2025, DART does not have any comments.

Existing bicycle and pedestrian facilities: Per DelDOT's Sussex County Bicycle Map, several study roadways are considered bicycle routes. Delaware Route 20 is considered a high traffic regional bicycle route with bikeway and Godwin School Road is considered a connector bicycle route without bikeway.

Planned bicycle and pedestrian facilities: DelDOT sent an email to Mr. Anthony Aglio on March 7, 2025. A response has not yet been received.

Bicycle Level of Traffic Stress in Delaware: Researchers with the Mineta Transportation Institute developed a framework to measure low-stress connectivity, which can be used to evaluate and guide bicycle network planning. Bicycle LTS analysis uses factors such as the speed of traffic, volume of traffic, and the number of lanes to rate each roadway segment on a scale of 1 to 4, where 1 is a low-stress place to ride and 4 is a high-stress place to ride. It analyzes the total connectivity of a network to evaluate how many destinations can be accessed using low-stress routes. Developed by planners at the Delaware Department of Transportation (DelDOT), the bicycle Level of Traffic Stress (LTS) model will be applied to bicycle system planning and evaluation throughout the state. The Bicycle LTS for the roadways under existing conditions along the site frontages are summarized below. The Bicycle LTS was determined utilizing DelDOT's Gateway.

- Delaware Route 20: 3
- Godwin School Road: 3
- Lakeview Road: 4
- Cross Keys Road: 4

Crash Evaluation

Per the crash data depicted on Figure 20 within the TIS from August 2021 to August 2024, provided by the Delaware Department of Transportation (DelDOT), a total of 20 crashes were reported within the study area. Of the 20 crashes reported, only 7 crashes involved personal injury.

Nine total crashes were reported at the Delaware Route 20/Governor Stockley Road/Cross Keys Road intersection, including six angle, one sideswipe (same direction), one front to rear, one front to front. Four of the nine crashes involved personal injury.

One total crash was reported at the Cross Keys Road/Lakeview Road intersection, including 1 sideswipe (opposite direction).

Two total crashes were reported at the Delaware Route 20/Godwin School Road intersection, including two not between vehicles.

Seven total crashes were reported at the Delaware Route 20/Sheep Pen Road intersection, including six angle and one front to rear. Three of the seven crashes involved personal injury.

Two total crashes were reported on Delaware Route 20 between Delaware Route 20/Governor Stockley Road/Cross Keys Road and Delaware Route 20/Godwin School Road, including 1 not between vehicles and one other.

Previous Comments

All the comments from the February 6, 2025 DelDOT PTIS review letter have been addressed in the Final TIS.

Sight Distance Evaluation

No sight distance constraints were noted at the proposed locations of the site entrances per the field visit conducted on March 12, 2025.

General HCS Analysis Comments

(See table footnotes on the following pages for specific comments)

- 1) The TIS used HCM 7th edition within HCS 2025 traffic analysis software to complete the analysis, whereas JMT used HCM 7th edition within HCS 2026 traffic analysis software.
- 2) Per DelDOT's *Development Coordination Manual*, JMT utilized the future intersection PHF of 0.80 for roadways with less than 500 vph, 0.88 for roadways between 500 and 1,000 vph, and 0.92 for roadways with more than 1,000 vph, or used the existing PHF if higher, whereas the TIS utilized the existing PHF.
- 3) JMT and the TIS utilized the existing heavy vehicle percentage for each movement greater than 100 vph in the Case 1 - Existing analysis.
- 4) Per DelDOT's *Development Coordination Manual* and coordination with DelDOT, JMT and the TIS used a heavy vehicle percentage of 5% for each movement less than 100 vph along roadways in the analyses.
- 5) Per DelDOT's *Development Coordination Manual*, JMT used a heavy vehicle percentage of 3% for each movement greater than 100 vph in Case 2 and Case 3 future scenario analysis, unless the existing heavy vehicle percentage was greater than 3% and there was no significant increase of vehicles along that movement, in which case the existing heavy vehicle percentage was used for the analysis of future scenarios, whereas the TIS utilized varying heavy vehicle percentages.
- 6) Results highlighted in gray indicate scenario analysis containing JMT recommended improvements.

Table 2
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control ¹	LOS per TIS			LOS per JMT		
1 - Site Entrance A/ Godwin School Road (Sussex Road 410) / Cedar Ridge Drive	Weekday AM	Weekday PM	Summer Saturday ²	Weekday AM	Weekday PM	Summer Saturday ²
Case 1 – 2023 Existing (T-intersection)						
Eastbound Cedar Ridge Drive Approach	A (9.0)	A (9.4)	A (9.1)	A (9.0)	A (9.4)	A (9.1)
Northbound Godwin School Road Left Turn	A (7.3)	A (7.4)	A (7.3)	A (7.3)	A (7.4)	A (7.3)
Case 2 – 2031 without Development (T-intersection)						
Eastbound Cedar Ridge Drive Approach	A (9.4)	A (10.0)	A (9.7)	A (9.4)	A (10.0)	A (9.7)
Northbound Godwin School Road Left Turn	A (7.4)	A (7.6)	A (7.5)	A (7.4)	A (7.6)	A (7.5)
Case 3 – 2031 with Development (T-intersection) ^{3,4}						
Eastbound Cedar Ridge Drive Approach	A (9.5)	B (10.2)	A (9.9)	A (9.5)	B (10.2)	A (9.9)
Northbound Godwin School Road Left Turn	A (7.4)	A (7.6)	A (7.5)	A (7.4)	A (7.6)	A (7.5)

*Site Entrance A is no longer proposed as part of the development

¹ For signalized and unsignalized analysis, the numbers in parentheses following levels of service are average delay per vehicle, measured in seconds.

² As turning movement counts were not collected for the summer Saturday peak hour, JMT and the TIS assumed values for the PHF and HV% per the DCM.

³ JMT maintained the existing PHF of 0.95, while the TIS used a PHF of 0.92 for the AM peak hour.

⁴ Analysis results based on having only one access point to the site via the Cross Keys Road and Lakeview Road intersection.

Table 3
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control ¹	LOS per TIS			LOS per JMT		
2 - Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412)	Weekday AM	Weekday PM	Summer Saturday ²	Weekday AM	Weekday PM	Summer Saturday ²
Case 1 – 2023 Existing (T- intersection)						
Eastbound Cross Keys Road Approach	A (9.4)	A (9.5)	A (9.0)	A (9.4)	A (9.5)	A (9.0)
Northbound Lakeview Road Left Turn	A (7.3)	A (7.5)	A (7.4)	A (7.3)	A (7.5)	A (7.4)
Case 2 – 2031 without Development (T-intersection)						
Eastbound Cross Keys Road Approach	A (9.5)	A (9.6)	A (9.1)	A (9.5)	A (9.6)	A (9.1)
Northbound Lakeview Road Left Turn	A (7.3)	A (7.5)	A (7.4)	A (7.3)	A (7.5)	A (7.4)
Case 3 – 2031 with Development ^{4,5}						
Eastbound Cross Keys Road Drive Approach	-	-	-	B (12.1)	B (14.4)	B (13.2)
Westbound Site Entrance B Approach	-	-	-	A (9.5)	A (9.2)	A (9.2)
Northbound Lakeview Road Left Turn	-	-	-	A (7.3)	A (7.5)	A (7.4)
Southbound Cross Keys Road Left Turn	-	-	-	A (7.5)	A (7.6)	A (7.5)
Case 3 – 2031 with Development and southbound auxiliary lane ^{4,5, 6}						
Eastbound Cross Keys Road Drive Approach	-	-	-	B (10.5)	B (11.3)	B (10.5)
Westbound Site Entrance B Approach	-	-	-	A (9.1)	A (9.1)	A (8.9)
Northbound Lakeview Road Left Turn	-	-	-	A (7.3)	A (7.5)	A (7.4)
Southbound Cross Keys Road Left Turn	-	-	-	A (7.4)	A (7.4)	A (7.4)

⁵ The intersection would operate as a four-legged intersection by addition of the site entrance and realignment. Eastbound Cross Keys Road and westbound Site Entrance B approaches would be stop-controlled.

⁶ JMT conducted an additional analysis incorporating a separate left turn lane along the southbound Cross Keys Road approach.

Table 3 (Continued)
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection All-Way Stop Control ¹	LOS per TIS			LOS per JMT		
2 - Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412)	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 3 – 2031 with Development ⁴						
Eastbound Cross Keys Road Left Turn	-	-	-	A (8.0)	A (8.2)	A (7.9)
Westbound Site Entrance B Left Turn	-	-	-	A (7.5)	A (7.7)	A (7.5)
Northbound Lakeview Road Left Turn	-	-	-	A (8.0)	A (7.9)	A (7.7)
Southbound Cross Keys Road Left Turn	-	-	-	A (8.0)	A (9.4)	A (8.7)
Overall	-	-	-	A (7.8)	A (8.8)	A (8.2)

Table 3 (Continued)
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Roundabout ¹	LOS per TIS			LOS per JMT		
2 - Site Entrance B / Cross Keys Road (Sussex Road 432) / Lakeview Road (Sussex Road 412)	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 3 – 2031 with Development ^{4,7}						
Eastbound Cross Keys Road Approach	A (3.3)	A (3.7)	A (3.4)	A (3.3)	A (3.7)	A (3.4)
Westbound Site Entrance B Approach	A (4.1)	A (3.5)	A (3.6)	A (4.1)	A (3.5)	A (3.6)
Northbound Lakeview Road Approach	A (3.7)	A (3.8)	A (3.5)	A (3.7)	A (3.8)	A (3.5)
Southbound Cross Keys Road Approach	A (3.2)	A (4.5)	A (3.9)	A (3.2)	A (4.5)	A (3.9)
Overall	A (3.7)	A (4.1)	A (3.7)	A (3.7)	A (4.1)	A (3.7)

⁷ JMT and the TIS analyzed the intersection as a single lane roundabout.

Table 4
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control (T- intersection)¹	LOS per TIS			LOS per JMT		
3 - Delaware Route 20 / Godwin School Road	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 1 – 2023 Existing						
Westbound Delaware Route 20 Left Turn	A (8.4)	A (8.0)	A (7.7)	A (8.4)	A (8.0)	A (7.7)
Northbound Godwin School Road Approach	B (14.7)	B (13.4)	B (11.2)	B (14.7)	B (13.4)	B (11.2)
Case 2 – 2031 without Development						
Westbound Delaware Route 20 Left Turn	A (8.5)	A (8.3)	A (8.0)	A (8.5)	A (8.3)	A (8.0)
Northbound Godwin School Road Approach	C (19.8)	C (17.2)	B (14.1)	C (19.7)	C (17.2)	B (14.1)
Case 3 – 2031 with Development ⁴						
Westbound Delaware Route 20 Left Turn	A (8.8)	A (8.4)	A (8.2)	A (8.8)	A (8.4)	A (8.2)
Northbound Godwin School Road Approach	C (24.7)	C (23.2)	C (17.5)	C (24.5)	C (23.2)	C (17.5)

Table 5
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control ¹	LOS per TIS			LOS per JMT		
4 - Delaware Route 20 / Country Living Road (Sussex Road 433)	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 1 – 2023 Existing						
Westbound Delaware Route 20 Left Turn	A (8.4)	A (8.0)	A (7.7)	A (8.4)	A (8.0)	A (7.7)
Northbound Country Living Road Approach	B (11.8)	B (10.3)	A (9.5)	B (11.8)	B (10.3)	A (9.5)
Case 2 – 2031 without Development						
Westbound Delaware Route 20 Left Turn	A (8.5)	A (8.1)	A (7.9)	A (8.5)	A (8.1)	A (7.9)
Northbound Country Living Road Approach	B (12.3)	B (10.7)	A (10.0)	B (12.3)	B (10.7)	A (10.0)
Case 3 – 2031 with Development						
Westbound Delaware Route 20 Left Turn	A (8.8)	A (8.3)	A (8.1)	A (8.8)	A (8.3)	A (8.1)
Northbound Country Living Road Approach	B (13.3)	B (11.3)	B (10.5)	B (13.3)	B (11.3)	B (10.5)

Table 6
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control ¹	LOS per TIS			LOS per JMT		
5 - Delaware Route 20 / Sheep Pen Road (Sussex Road 328)	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 1 – 2023 Existing						
Eastbound Delaware Route 20 Left Turn	A (7.7)	A (8.0)	A (7.6)	A (7.7)	A (8.0)	A (7.6)
Westbound Delaware Route 20 Left Turn	A (8.8)	A (8.0)	A (7.7)	A (8.8)	A (8.0)	A (7.7)
Northbound Sheep Pen Road Approach	B (14.6)	B (10.9)	A (9.9)	B (14.7)	B (10.9)	A (9.9)
Southbound Sheep Pen Road Approach	C (20.1)	C (18.9)	B (11.8)	C (20.1)	C (18.9)	B (11.8)
Case 2 – 2031 without Development (T-intersection) ^{8, 9}						
Westbound Delaware Route 20 Left Turn	A (9.5)	A (9.2)	A (8.4)	A (9.3)	A (9.2)	A (8.4)
Northbound Sheep Pen Road Left Turn	D (28.6)	E (47.6)	C (21.6)	D (28.5)	E (47.5)	C (21.0)
Northbound Sheep Pen Road Right Turn	C (22.0)	B (12.0)	B (11.7)	C (22.2)	B (12.1)	B (11.6)
Case 3 – 2031 with Development (T-intersection) ^{8,9}						
Westbound Delaware Route 20 Left Turn	A (9.9)	A (9.5)	A (8.7)	A (9.7)	A (9.5)	A (8.6)
Northbound Sheep Pen Road Left Turn	D (33.4)	F (60.6)	D (25.8)	D (33.3)	F (60.5)	C (24.9)
Northbound Sheep Pen Road Right Turn	D (27.1)	B (12.7)	B (12.5)	D (27.4)	B (12.8)	B (12.4)

⁸ JMT and the TIS analyzed the intersection incorporating the relocation of northbound Sheep Pen Road to the west and the provision of separated turn lanes along all approaches as part of the *US 113 at SR 20 Grade Separated Intersection* (DelDOT Contract No. T202112702). The northern leg of Sheep Pen Road was not analyzed as future volumes for that intersection were not provided within the TIS.

⁹ JMT maintained the existing PHF of 0.94, while the TIS used a PHF of 0.92 for Summer Saturday peak hour.

Table 7
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection Two-Way Stop Control ¹	LOS per TIS			LOS per JMT		
6 - Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 1 – 2023 Existing						
Eastbound Delaware Route 20 Left Turn	A (8.0)	A (8.0)	A (7.8)	A (8.0)	A (8.0)	A (7.8)
Westbound Delaware Route 20 Left Turn	A (8.4)	A (7.9)	A (7.7)	A (8.4)	A (7.9)	A (7.7)
Northbound Cross Keys Road Approach	E (38.8)	C (20.4)	B (14.1)	E (39.9)	C (21.0)	B (14.1)
Southbound Governor Stockley Road Approach	C (21.9)	C (22.6)	B (13.0)	C (24.1)	C (22.8)	B (13.1)

Table 7 (Continued)
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Unsignalized Intersection All-Way Stop Control ¹	LOS per TIS			LOS per JMT		
6 - Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 1 – 2023 Existing						
Eastbound Delaware Route 20 Approach	D (29.3)	B (13.9)	A (9.7)	D (28.9)	B (13.9)	A (9.7)
Westbound Delaware Route 20 Approach	B (11.7)	B (13.4)	A (9.4)	B (11.7)	B (13.4)	A (9.4)
Northbound Cross Keys Road Approach	B (11.3)	B (10.3)	A (8.7)	B (11.3)	B (10.3)	A (8.7)
Southbound Governor Stockley Road Approach	B (10.1)	B (12.1)	A (8.7)	B (10.1)	B (12.1)	A (8.7)
Overall	C (21.6)	B (13.0)	A (9.4)	C (21.4)	B (13.0)	A (9.4)
Case 2 – 2031 without Development ¹⁰						
Eastbound Delaware Route 20 Approach	F (63.3)	D (30.4)	B (13.5)	F (63.6)	D (30.4)	B (13.9)
Westbound Delaware Route 20 Approach	C (17.4)	D (25.7)	B (12.7)	C (17.7)	D (25.7)	B (13.1)
Northbound Cross Keys Road Approach	B (12.6)	B (12.4)	A (9.7)	B (12.6)	B (12.4)	A (9.7)
Southbound Governor Stockley Road Approach	B (11.4)	C (16.3)	A (9.9)	B (11.4)	C (16.3)	B (10.0)
Overall	E (40.2)	C (24.5)	B (12.5)	E (40.4)	C (24.5)	B (12.9)
Case 3 – 2031 with Development ^{4,10}						
Eastbound Delaware Route 20 Approach	-	-	-	F (109.7)	F (55.6)	C (18.3)
95 th Percentile Queue Length	-	-	-	553'	303'	115'
Westbound Delaware Route 20 Approach	-	-	-	D (25.4)	F (96.2)	C (22.0)
95 th Percentile Queue Length	-	-	-	158'	450'	155'
Northbound Cross Keys Road Approach	-	-	-	C (16.9)	C (16.3)	B (11.7)
Southbound Governor Stockley Road Approach	-	-	-	B (12.6)	C (21.9)	B (11.6)
Overall	-	-	-	F (61.9)	F (60.0)	C (18.2)

¹⁰ JMT maintained the existing PHF of 0.90, while the TIS used a PHF of 0.92 for Summer Saturday peak hour.

Table 7 (Continued)
Peak Hour Levels of Service (LOS)
Based on Traffic Impact Study & Addendum for White's Farm
Reports Dated: March 2025 (TIS) & April 1, 2026 (Addendum)
Prepared by: Davis, Bowen & Friedel, Inc.

Roundabout ¹	LOS per TIS			LOS per JMT		
6 - Delaware Route 20 / Governor Stockley Road (Sussex Road 432) / Cross Keys Road ¹¹	Weekday AM	Weekday PM	Summer Saturday	Weekday AM	Weekday PM	Summer Saturday
Case 3 – 2031 with Development ⁴						
Eastbound Delaware Route 20 Approach	A (9.6)	A (9.5)	A (6.8)	A (9.6)	A (9.6)	A (6.9)
Westbound Delaware Route 20 Approach	A (8.4)	A (8.7)	A (7.1)	A (8.6)	A (8.8)	A (7.3)
Northbound Cross Keys Road Approach	B (11.6)	A (6.9)	A (5.9)	B (11.8)	A (6.9)	A (6.0)
Southbound Governor Stockley Road Approach	A (5.4)	A (9.6)	A (5.8)	A (5.4)	A (9.6)	A (5.9)
Overall	A (9.3)	A (9.0)	A (6.7)	A (9.4)	A (9.0)	A (6.8)

¹¹ Both the TIS and JMT conducted a roundabout analysis as that is the proposed improvement associated with the SR 20 Intersections Improvements DelDOT project.