

## EMERGENCY VEHICLE ACCESS DURING PROJECT PERIOD

Fire protection services for Tinicum Township residents and businesses is provided by Delaware Valley Volunteer Fire Company (hereinafter "DelVal") based in Erwinna, PA, just South of the Bridge. DelVal and Frenchtown Borough Fire Company frequently provide each other with mutual aid in emergencies, and fire apparatus crosses the Bridge to provide mutual aid two times per week on average throughout the calendar year.

During the  $\sim 10$  month Project period, as currently proposed, vehicular traffic would be limited to eastbound traffic only and in a travel lane reduced to 8 feet 6 inches wide. When the Board inquired at the June 17, 2024 virtual meeting for Tinicum Township officials what accommodations would be made to allow for emergency vehicles passage across the Bridge during the Project period, we were told there would be none. We were further advised emergency vehicles would need to follow the 13-mile detour through Milford, New Jersey. This is completely unacceptable.

The Project must be modified so as to allow for the passage of emergency vehicles, traveling in either direction, throughout the Project period. In order for this to occur, the single lane of travel must be widened from the current plan of eight feet six inches to accommodate the emergency vehicles. The Board requests the Project manager to coordinate directly with DelVal and Frenchtown Borough Fire Company to determine the minimum lanewidth necessary for emergency vehicles to safely pass through, and then to modify the Project accordingly.

## PROPOSED ARCHITECTURAL LED LIGHTING

The Project contemplates the installation of architectural LED lighting to showcase the elements of the six-span riveted steel Warren-truss superstructure. The Board has heard and understands the time of day the LEDs would be on and when they would be dimmed, as well as the standard LED lighting color and programmability of this palette. While we agree the elements of the structure are worthy of admiration, we strongly oppose the installation of architectural LED lighting for the following reasons.

#### Harmful to Residents

Tinicum Township is a rural and historically significant municipality that seems to exist in a world untouched by time. Tinicum is known for its natural landscapes of rolling hills, forests, creeks, winding narrow roads, and charming farmhouses. Our residents choose to make Tinicum Township their home precisely because it offers a tranquil haven removed from the relentless intrusion and rush of contemporary life. Architectural LED lighting would be completely out of character for our area, and would be a constant intrusion into and detraction from the qualities that make Tinicum so special. The Board respectfully requests the Project be modified to eliminate the architectural LED lighting components in their entirety.

### Harmful to Wildlife

Any lighting is disruptive to migrating birds as well as to insects and other wildlife. Many species rely on natural light cycles for their behaviors and life processes. Disrupted night skies can interfere with migration, reproduction, and feeding patterns, affecting entire ecosystems. The Delaware River is an important and sensitive habitat for migratory birds, fish, insects, and other wildlife. Reducing the overall amount of light pollution from the Bridge after the Project is

completed is a worthy goal and achievable, in part, by eliminating the architectural LED lighting entirely.

### **Frenchtown Borough Resolution**

The Board recognizes the Resolution Opposing the Proposed Lighting Plan for the Uhlerstown-Frenchtown Toll-Supported Bridge passed by Frenchtown Borough Council last week, and joins in the opposition expressed therein.

# **ENVIRONMENTAL IMPACTS OF THE PROJECT**

#### **Cliff Swallow Colony**

For many years, a colony of cliff swallow have built their nests under the Bridge. Cliff swallow are protected under the Migratory Bird Treaty Act, and should not be disturbed during their nesting season which runs from April through June.

The Board requests that DRJTBC consult with wildlife biologists to be certain the Project does not interfere with Cliff Swallow nesting season, and that any Project work take place well before the birds arrive or after they finish nesting.

## **Dark Skies and Safety Lighting**

The absence of light pollution allows for clearer observations of stars and other celestial bodies, contributing to our appreciation for the natural world and understanding of the universe. In planning for the safety lighting on the Bridge, its impacts should be reduced as much as possible by considering the latest information on direction, duration, intensity, and spectrum for reducing wildlife impacts. The United States Fish and Wildlife Service, through its Dark Skies Initiative, offers valuable resources on the harmful effects of artificial lighting.

The Board requests the DRJTBC consult this resource and implement all feasible modifications to minimize light pollution from the safety lighting. (See <a href="https://www.fws.gov/project/dark-skies-initiative">https://www.fws.gov/project/dark-skies-initiative</a>), and also ensure compliance with Tinicum Township's lighting ordinance.

# Lower Delaware Wild & Scenic Designation

This section of the Delaware River Basin has received Wild and Scenic designation pursuant to the Wild and Scenic Rivers Act. Both Tinicum Township and Frenchtown are among the 22 municipalities that benefit from this important designation through national recognition and prestige which often invites economic investment in the community.

The Board requests DRJTBC consult with the Lower Delaware Wild and Scenic River Management Council, and consider their feedback and input on all aspects of the Project.

### **OTHER EXISTING CONDITIONS NEEDING IMPROVEMENT**

# Improvements Needed for Pedestrians on Pennsylvania Side of Bridge

As mentioned at the outset, the proposed widening of the pedestrian walkway is understandable given the increasing utilization of the bridge by pedestrians and cyclists. However, there are no existing features, such as a crosswalk or other improvements, to allow for continued safe movement of pedestrians or cyclists on the Pennsylvania side.

There are certainly places for pedestrians and cyclists to go on the Pennsylvania side. For example, immediately opposite the Bridge in PA is Schneiderwind's Farmstand and the Tinicum CSA. There is public access to the Delaware Canal State Park on Uhlerstown Road at the covered bridge. The Delaware Canal State Park features a 61-mile long towpath along the Delaware Canal, and is a beautiful recreational asset that is growing in popularity and provides easy access to nearby Amanda's Riverside Café, Golden Pheasant Inn, and the Homestead. For pedestrians and cyclists using this towpath, Frenchtown would be a much more attractive stop if the crossing were safe and well-marked. The trouble is, currently, there is no safe way to cross Route 32 or to safely access Uhlerstown Road and the entrance to the Delaware Canal State Park from the Bridge.

The last time the Bridge was rehabilitated, Frenchtown received community improvements including the large parking lot adjacent to the Bridge. The Board asks the DRJTB to consider adding improvements on the Pennsylvania side during this Project to allow pedestrians and cyclists to more safely cross Route 32 and to safely access (without trespassing on private property) Uhlerstown Road.

# **Noncompliant Sight Line**

The sight line from a motor vehicle entering Pennsylvania from the Bridge is obstructed and noncompliant. The required clear sight line to the north is obstructed by a USGS equipment cabinet, stainless steel pole for a security camera, and overgrown or too-tall landscaping planted along the Bridge wing wall. The Board requests the DRJTBC address the noncompliant site line at this intersection within the scope of the Project.

#### **Noncompliant Intersection**

The driveway across from the Pennsylvania entry to the Bridge has been modified to create effectively a four-way intersection at the Bridge. This is an unsafe condition that warrants correction. The Board requests the DRJTBC address the noncompliant four-way intersection as part of the Project.

# Width of Driving Lanes

The current width of the lanes of vehicle are travel are just barely wide enough for two vehicles to pass. Often times drivers need to pull in their driver side mirrors so as to not to bump with a vehicle heading in the opposite direction. The Board asked the DRJTBC to consider widening the widths of the travel lanes as part of the Project.

### **CONCLUSION**

The Board appreciates the Project being initiated and the opportunity to submit comment. We reiterate that the Project must be modified so as to allow for the passage of emergency vehicles, traveling in either direction, throughout the Project period. We also reiterate our total opposition to the architectural LED lighting. We would welcome the opportunity for ongoing dialogue with DRJTBC relating to this Project.

	Very truly yours,	
	Eleanor M. Breslin /s/	
	ELEANOR M. BRESLIN	
Cc:	Mayor of Frenchtown Marion Kyde, Tinicum Township Liaison to LDW&S ( <i>Via Email Only</i> )	

Staff Response:

- Regarding elements of this letter stating that "The Project must be modified..." and "we strongly oppose" -- The bridge is owned and operated by the Delaware River Joint Toll Bridge Commission. The bridge does not belong to the host municipalities of Tinicum, PA. or Frenchtown, N.J., nor the residents of those municipalities. Tinicum Township does not have regulatory authority over a bi-state agency with a federal compact.
- Emergency vehicle access during project period
  - A rehabilitation of any two-lane bridge without shoulders is going to produce travel impacts. The project is being designed in a manner to ensure New-Jersey-bound travel across the bridge as much as possible despite the bridge's total 16-foot, 6-inch roadway deck width. Fire and emergency vehicles which are supposed to travel only in the center of the bridge would not be able to travel across the bridge when a construction work zone is established.
  - Commission records show the Delaware Valley Volunteer Fire Company last requested permission to drive its vehicles across the bridge in 2005. The three vehicles it listed were a 1997 KME, a 1968 Bruco, and a 2003 KME. If the fire company has updated its vehicle fleet, it has not reported it to the Commission so engineers can evaluate the vehicle weights and widths to determine if they can safely cross the bridge in accordance with current restrictions.
  - The statement to the effect that crossings of potentially unevaluated fire vehicles are occurring at an average two times per week is alarming, especially to engineers charged with ensuring the structural integrity of this aging steel truss bridge.
  - Officers of the Delaware Valley Volunteer Fire Company should be contacting the Commission about this matter, not Tinicum's governing body.
  - As for the width of the travel lane during project construction, the bridge rehabilitation is designed in a manner to ensure a safe and effective work zone so workers can carry out the project's various tasks.
  - Delaware Valley Volunteer Fire Company officials should contact the Commission directly and provide the weights and widths of their vehicles for evaluation by the Commission's engineers.
- Architectural LED lighting
  - The Commission has fully disclosed that it will outfit the bridge with both new roadway lighting and an additional architectural lighting system.
  - Both the architectural and roadway lighting systems are being designed in a manner to direct lighting onto the structure itself. Light is not being broadcast directly into the night skies, onto the river, or into nearby neighborhoods. The public input received during this public comment process has compelled the lighting system designers to further refine their plans by prescribing a warmer lighting orientation, by shifting uplighting to a downward orientation, and by re-aiming direct-view luminaires downward.
  - The steel-truss Uhlerstown-Frenchtown Toll-Supported Bridge has had a variety of lighting systems since opening to traffic on Oct. 10, 1931. There are no studies indicating that the envisioned project will appreciably increase the amount of light to such a degree that it would be disorienting to migrating birds and insect populations.

- The township-provided link to the U.S. Fish & Wildlife Service's Dark Skies Initiative webpage -- <u>https://www.fws.gov/project/dark-skies-initiative</u> -- applies to national wildlife refuges. It is irrelevant to this bridge location.
- A local lighting ordinance does not apply to a bi-state agency with a federal compact.
- Cliff swallows
  - Construction is expected to begin in winter, prior to cliff swallows' spring nesting season. Cliff swallows are a resilient species, and the Commission has experience with these birds at other bridge locations. The birds will nest elsewhere and return, if they deem it a more favorable location in some ensuing spring after project completion. (Please note: Cliff swallows certainly nested elsewhere prior to the construction of the covered wooden bridge (1843) and steel-truss spans (1904 and 1931) at this location.)
- Dark skies and safety lighting
  - Both the architectural and roadway lighting systems are being designed in a manner to direct lighting onto the structure itself. Light is not being broadcast directly into the night skies, onto the river, or into nearby neighborhoods. The public input received during this public comment process has compelled the lighting system designers to further refine their plans by prescribing a warmer lighting orientation, by shifting uplighting to a downward orientation, and by re-aiming direct-view luminaires downward.
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- Lower Delaware Wild & Scenic Designation
  - The Lower Delaware Wild and Scenic River Management Council does not have regulatory authority over a bi-state agency with a federal compact.
- Pedestrian improvements on the bridge's Pennsylvania side
  - The Commission cannot unilaterally paint a crosswalk across a state highway.
  - The Commission has limited property on the bridge's Pennsylvania side. And there is a sidewalk to the end of the Commission's jurisdiction at PA Route 32/River Road.
  - The township's comment regarding improvements outside the Commission's jurisdiction exceeds this bridge rehabilitation project's scope.
  - At many other Commission bridge locations with pedestrian facilities, municipalities have constructed sidewalks and crosswalks to promote pedestrian access to a Commission bridge. The Commission cannot explain why that has not been the case with Tinicum Township. The current steel bridge has had a walkway since it first opened to traffic in October 1931.
  - The Commission <u>did not</u> provide community improvements to Frenchtown as part of the 2001 rehabilitation of the Uhlerstown-Frenchtown Toll-Supported Bridge.
- Obstruction caused by United States Geological Survey (USGS) steel cabinet
  - Because of public comments received for this project, the USGS cabinet's size and location have been examined as part of final design. Possible solutions could include moving the existing equipment box so it will be less of an obstruction to driver sightlines and/or installation of a newer, smaller USGS box. Complete removal of USGS

equipment is not an option; the equipment is vital for monitoring river levels, especially in flooding situations.

- Obstruction caused by "noncompliant intersection"
  - The resolution fails to provide specific details of what is non-compliant about the T-intersection of the bridge approach and PA Route 32.
  - There are state highways with T-intersections across the Commonwealth of Pennsylvania.
  - This might be a matter best directed by Tinicum Township to the Pennsylvania Department of Transportation (PennDOT), which issues highway occupancy permits. The T-intersection dates back more than a century to when this bridge crossing consisted of a narrow covered wooden structure operated by a local private company that charged tolls to cross in either direction. Has Tinicum Township ever endeavored to address this issue or communicate its concerns before?
  - The township's comment regarding improvements outside the Commission's jurisdiction exceeds this bridge rehabilitation project's scope.
- Width of driving lanes (on bridge roadway)
  - Obviously, the Commission knows the bridge is narrow. Only two other vehicular bridges in the Commission's system are narrower.
  - The bridge's roadway width was a major concern expressed in this project's public comment process. Accordingly, the project will include removal of the bridge's current guiderails and installation of narrower railings to protect the structure's trusses. Steel curbing also will be added to mitigate vehicular sideswipes with the new railings. As a result of these changes, the fender-height roadway width will be widened to 17-feet, 1-inch from the current 16-feet, 6-inches.

<ol> <li>Prenchtown Environmental Commission</li> <li>Draft Resolution Opposing the Delaware River Joint Toll Bridge Commission's (DRJTBC) proposed lighting for the Uhlerstown-Frenchtown Bridge Passed by vote on July 9, 2024</li> <li>Whereas the Delaware River from just south of the Gilbert Generation Station in Holland Twp to just north of the Point Pleasant PA pumping Station is a National Wild and Scenic River.</li> <li>Whereas the proposed Architectural Bridge lighting serves no functional use, is a threat to nocturnal wildlife, is a threat to the area's abundant migrating and resident wildlife, would detract from the natural beauty in the area, cannot be easily appreciated due to trees lining both sides of the river in the area, is a waste of resources to design, build and provide electric power to operate and would not fit in with the rural and historic character of the small river town of Frenchtown and the small river hamlet of Uhlerstown.</li> <li>Whereas the proposed LED lighting for the bridge decking for cars and the walkway for pedestrians would contain wavelengths shorter than amber light (2300 deg Kelvin) and be a threat to nocturnal wildlife</li> <li>Whereas the area's current dark sky would receive little impact if DRJTBC adopted Dark Sky standards for bridge lighting</li> <li>Now be it resolved, the DRJTBC should abandon the planned Architectural lighting for the Uhlerstown-Frenchtown Bridge; utilize amber lighting, equal to or less than 2300 degrees Kelvin light, for the bridge decking (for cars) and the pedestrian walkway and change the proposed lighting to conform to Dark Sky standards.</li> <li>Also be it resolved, the Frenchtown Environmental Commission will send this resolution to the Frenchtown Mayor and Council, the DRJTBC, the Delaware River Keeper, the Lower Delaware Wild and Scenic Council, Our Esteemed Governor of New Jersey, NJ State Representatives in the Senate and Assembly as well as the Chair of the Board of Supervisors in Tinicum Township, PA.&lt;</li></ol>	F	anghtown Environmental Commission	
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Staff Response:

- As is the case with other municipal environmental commissions across New Jersey, the Frenchtown Environmental Commission (FEC) is an advisory body to the Frenchtown Borough Council. It does not have any regulatory authority over a bi-state agency with a federal compact.
- The Commission has duly informed the public that the installation of roadway and architectural lighting will be among the upcoming rehabilitation project's major construction elements.
- National Wild and Scenic Rivers System
  - The FEC states that the bridge is located within a section of the Delaware River with a National Wild and Scenic River designation, but this unelected advisory body in Frenchtown fails to explain what aspects of that designation would be affected with architectural lighting on the bridge. It must be noted that both sides of the river at this location have been settled and developed with roads, houses, businesses, and other structures over more than 200 years. It is far from "primitive." The current bridge has had lights since opening to traffic in October 1931. The addition of a high-efficiency color-programmable LED lighting system will not impede this river section's freeflowing condition, the ultimate objective of the Wild & Scenic Rivers Act of Oct. 2, 1968.
- Purpose and function
  - The architectural lighting will highlight the bridge's Warren truss structural design.
  - Communities all over the world are utilizing color-changing LED lighting on bridges and other landmarks.
- Wildlife
  - The FEC resolution does not mention a single species of the "area's abundant migrating and resident wildlife" that allegedly would be threatened by the architectural lighting on the bridge.
- Aesthetics
  - The "natural beauty of the area" has been impacted by more than two centuries of settlement, development, and growth including a former railroad that began service through Frenchtown in the mid-19<sup>th</sup> century. Frenchtown is served by two state highways and several county roads. Uhlerstown is served by a north-south state highway. There are businesses and restaurants in relative proximity on both sides of the river and there is a gasoline station on the other side of Frenchtown's business district.
- Trees
  - The Bridge Commission has no intentions of felling trees to further enhance viewing opportunities of the bridge's architectural lights. The bridge will be viewable from shorelines and roadways on both sides of the river just as it is now.
- Rural and historic character
  - This area of the river has been impacted by more than two centuries of settlement, development, and growth including a former railroad that began service through Frenchtown in the mid-19<sup>th</sup> century. Frenchtown is served by two state highways and several county roads. Uhlerstown is served by a north-south state highway. There are parking lots, businesses, and restaurants in close proximity to the bridge in

Frenchtown. A well-lit gasoline station is on the other side of the borough's central business district.

- Re: electric power -- LED lights are highly efficient and generate minimal heat in contrast to older forms of electrical lighting.
- Lighting wavelengths
  - As owner and operator of the bridge, the Bridge Commission shall decide what the lighting wavelengths will be, not the municipal advisory FEC.
  - Both the architectural and roadway lighting systems are being designed in a manner to direct lighting onto the structure itself. Light is not being broadcast directly into the night skies, onto the river, or into nearby neighborhoods. The public input received during this public comment process has compelled the lighting system designers to further refine their plans by prescribing a warmer lighting orientation, by shifting uplighting to a downward orientation, and by re-aiming direct-view luminaires downward.
- Dark Skies
  - (Note: The last item in the resolution reads to the effect that there is a dark sky over Frenchtown. The bridge has had lighting since it opened to traffic in 1931 and there has been a proliferation of electric lights in Frenchtown over the past 100 years or so.)
  - DarkSky International, an advocacy organization, has no regulatory authority over a bistate agency with a federal compact.
  - There are no studies indicating that the envisioned project will appreciably increase the amount of light to such a degree that it would be disorienting to migrating birds and insect populations.
  - Communities all over the world are utilizing color-changing LED lighting on bridges and other landmarks.

Frenchtown	Borough
Council	

<b>RESOLUTION #2024-91</b>	
<b>Opposing the Proposed Lighting Plan for the</b>	
Uhlerstown-Frenchtown Toll-Supported Bridge	2
WHEREAS, The Uhlerstown-Frenchtown Toll-Supported Bridge connects Brid Route 12 in Frenchtown, Hunterdon County, N.J. with River Road/PA Route 32 in the section of Tinicum Township, Bucks County, PA; and	
WHEREAS, The bridge has a 15-ton weight limit, a 12-foot, 6-inch height restrict MPH speed limit and carries an average of 4,200 vehicles per day according to 2023 s he Delaware River Joint Toll Bridge Commission (DRJTBC); and	
WHEREAS, The Bridge's last rehabilitation occurred in 2001. The project entailed eplacement, new guide rail installation, new roadway lighting installation, paint repainting of the trusses and other structural steel components. The work was intenstructure in a state of condition allowing it to avoid major repairs and travel impacts years; and	removal, and ded to put the
WHEREAS, The DRJTBC is proposing another rehabilitation of the Uhlerstown foll-Supported Bridge for 2025; and	n-Frenchtown
WHEREAS, Open house presentations for the 2025 Uhlerstown-Frenchtown T Bridge Rehabilitation Project were held in Tinicum, PA. on June 24 and in French June 25; and	
WHEREAS, A common theme of concern among residents and business owners open house presentations, was the Architectural Lighting Design as proposed by DR	
WHEREAS, The proposed Architectural Lighting Design does not appear to be in he rural and historic character of the communities that the Uhlerstown-Fren Supported Bridge serves, nor the quiet and natural landscape of the riverbanks on he Delaware River; and	chtown Toll-
WHEREAS, Even worse, control over the new programmable 'carnival style' progra lighting will not rest with local officials; and	mmable LED
WHEREAS, Use of this style of lighting by the DRJTBC has been used previously areas to mixed review;	in more urban
<b>NOW, THEREFORE, BE IT RESOLVED</b> , that the Common Council of the Frenchtown does hereby oppose in the strongest terms possible, the proposed Lighting Design by the DRJTBC as part of the rehabilitation of the Uhlerstown-Fre	Architectural

**BE IT FURTHER RESOLVED,** that a copy of this resolution shall be sent to members of the 15<sup>th</sup> Legislative District, Governor Phil Muphy, and the DRJTBC for inclusion in their public comment period.

Brad Myhre, Mayor

Attest:

July 3, 2024 Shepherd DUMAA A A Brenda S. Shepherd, RMC Borough Clerk

Staff Response:

- The bridge is owned and operated by the Delaware River Joint Toll Bridge Commission. The Commission has fully disclosed that it will outfit the bridge with both new roadway lighting and an additional architectural lighting system. The bridge does not belong to the host municipalities of Tinicum, PA. or Frenchtown, N.J., nor the residents of those municipalities.
- Both the architectural and roadway lighting systems are being designed in a manner to direct lighting onto the structure itself. Light is not being broadcast directly into the night skies, onto the river, or into nearby neighborhoods. The public input received during this public comment process has compelled the lighting system designers to further refine their plans by prescribing a warmer lighting orientation, by shifting up-lighting to a downward orientation, and by re-aiming direct-view luminaires downward.
- Uhlerstown-Frenchtown Bridge users should be wary of photographs of the Northampton Street Bridge between Easton, PA. and Phillipsburg, N.J. that have been posted on Facebook pages in the Uhlerstown and Frenchtown areas. Many of those photographs depict the Northampton Street Bridge while its new architectural lighting system was undergoing testing for its colorchanging and brightness/dimming capabilities. Those photographs are not representative of how the architectural lighting will look at the Uhlerstown-Frenchtown Bridge.
- This area of the river has been impacted by more than two centuries of settlement, development, and growth – including a former railroad that began service through Frenchtown in the mid-19<sup>th</sup> century. Frenchtown is served by two state highways and several county roads. Uhlerstown is served by a north-south state highway. There are parking lots, businesses, and restaurants in close proximity to the bridge in Frenchtown. A gasoline station is on the other side of the borough's central business district.
- The architectural lighting will highlight the bridge's Warren truss structural design. Perhaps the council erred by applying the term "carnival style" to the bridge's architectural lighting instead of the non-directed lights strung across the borough's central business district.
- Communities all over the world are utilizing color-changing LED lighting on bridges and other landmarks.
- Since the Commission owns and operates the bridge, only its designated employees shall control the bridge's eventual lighting displays based on the lighting policy that will be posted on the Commission's website.