

The HOP applicant completed their Transportation Impact Study (TIS), which included studying the proposed warehouse driveway intersection and the impacted "off-site" intersections. The TIS was approved November 16, 2016. After the April 12, 2017, meeting, PennDOT required the HOP applicant to perform additional supplemental traffic analyses to address all the items of concern raised by the residents and Township officials. PennDOT also independently collected traffic counts to be used as a cross check of the Developer's traffic counts. The HOP applicant's supplemental traffic analysis dated June 29, 2017, showed that the warrant for a traffic signal was not satisfied even when utilizing the higher volume ITE 150 warehouse code.

This 100 page study, provided by the DEVELOPER, and not performed by PennDOT as requested at the April 12th meeting, is performed inaccurately:

- 1) It is performed during the summer when school is not in session. We have an elementary school located .4 miles from the I-78 bridge, we have a middle school and a high school located in Kutztown which serves Greenwich and surrounding townships. School buses and school traffic for parents, administration and other school related traffic were not included in this study and during school months, traffic is greatly increased.
- 2) The study is done on a Thursday, when by all accounts, from PennDOT's letter dated January 2017, the highest traffic for our area has been shown to be on a Tuesday.
- 3) The study was performed by a manual turning count (by a person sitting in a vehicle on the side of the road. From that position, he/she could not see the fifth intersecting road) and does NOT include the fifth intersecting road, Rhoades Road. The township requested, at the October 2nd meeting that the Developer do another study that includes this fifth leg of the intersection. ***(see attached documents relating to the unsafe conditions in this intersection at this fifth leg junction)***



We would like to see the study of independently collected traffic counts done by PennDOT ... as we did not see, at any time since the April 12th meeting, a PennDOT vehicle and person, nor a road strip counter, at this intersection. We did see, north on Route 737, PennDOT counters however, these numbers pulled .5 miles from this intersection, cannot be used to verify the developers count for the intersection.

You have misunderstood our needs for a full review on the HOP. We are not requesting a traffic light. I personally have lived with this intersection for 25 years. It works fine for auto traffic. It does not work AT ALL for tractor trailer traffic as the intersection is too narrow for safe traveling or turning of vehicles

over the size of a van truck. *(see attached documents relating to the unsafe conditions in this intersection)*

We currently handle around 30 to 35 local trucks per day and at that volume, you can see in the documents provided, we have very unsafe driving conditions through the Krumsville intersection. The developer wants to add an additional 250 to 300 trucks per day.

The numbers presented the second time for a warehouse TIE Code 150 are still incorrect, based on the ITE analysis. The developer stated 1984 trips per day under ITE Code 150 (which would put them into a medium volume HOP and they have only applied for a low volume HOP). We reviewed the ITE numbers and worse case scenario is 10,000 trips per day (for a parcel hub of 505,000 square feet.)

We are requesting a denial of an HOP for a WAREHOUSE the size of 505,000 square feet.

We reviewed 14 warehouses and warehouse districts along the I-78 corridor from Bethlehem to Bethel. We spent the necessary time to sit and watch the traffic in and out of the warehouses and the warehouse districts. In all 14 cases, access to the warehouse and warehouse district is straight off the highway. At none of these 14 locations did traffic have to travel through a narrow intersection and then through a residential area with no shoulder on the road.

SIDE NOTE! One of the 14 locations DID (at one time) have a small intersection with buildings close to the road and in that case, the developer was responsible for purchasing three of the four buildings. Those buildings were destroyed so the intersection could be widened and made safe for tractor trailer traffic.

In addition, the applicant's engineer performed peak hour queue observations for the State Route 737/Old 22 intersection and particularly for the State Route 737 northbound approach to Old 22. Queue lengths were documented and determined not to be excessive for typical weekday peak hours. Queues will extend past several driveways and Rhoads Road due to the proximity of these side-roads to the intersection of Old 22/State Route 737. Other than 'Do Not Block Intersection' signs, there is no method for preventing this.

We are disputing this statement with documented photos and videos we have taken within the past 30 days.

Please note there are two business parking lots located within 50 feet of this intersection stop directly accessing Old Rt 22, which are compromised by queuing at the light during peak times. There are also three residential driveways accessing Old 22 within 50 feet of this intersection stop which are also compromised by queuing at the light during peak times.

And the new ramp for the west bound exit of I-78 is roughly 325 feet from the intersection stop. During peak traffic hours, cars queue up past the ramp egress and over the bridge ON A DAILY BASIS (we have provided photos) with the traffic volumes we currently experience. Adding an additional 1900+ trips per day to this current volume will create undue hazards at the bridge exits and entrances.

Signs stating "DO NOT BLOCK INTERSECTION" are not going to prevent the above scenarios and unfortunately, with the location of the parking lots and the driveways, would actually create further hazards to drivers as they would be unable to be at the intersection to see that their way was clear to pull out into the intersection.

When adding 1900+ trips per day to the current volume of traffic, the only way you could prevent the current traffic queuing blocking these access points, and prevent tractor trailers from running over the cars queued at the stop, would be to install a proper light and stop lines 50 feet back from the intersection.

The addition of a traffic signal to control all approaches to this intersection (including Rhoads Road and/or driveways) would result in undue delay for all approaches at all time periods of the day and night. Note, the 'old' WB off ramp was approximately 200' from Old 22. The 'new' WB off ramp is approximately 400' from Old 22.

WE DO NOT WANT A TRAFFIC LIGHT, we want the HOP denied based on the PennDOT known issues in this intersection under the current traffic volumes.

In regards to the safety of Old 22/State Route 737, Department records indicate a total of 6 reportable crashes for the five-year period 2012 to 2016. All the crashes involved cars that either failed to stop or proceeded into the intersection without clearance. None of the crashes involved trucks. Our records for 2017 are incomplete now, however we are aware of only one reportable crash in 2017 at this intersection. That crash was caused by two cars pulling out from their stopped positions at the same time and there were no injuries.

We are disputing these numbers. We have two residents prepared to come forward regarding their previous injuries that occurred in this intersection. One in January 2016, she is permanently disabled and unable to live a full life. Second in March 2017, she is still undergoing physical therapy for her injuries.

During the year 2015, there were five police reported accidents. One included five vehicles. I do not have photos of this one, as we were unaware we would need to provide documents in the future, however, I was there and I was a written witness. In this accident, the intersection was completely closed for over two hours while police took reports and cleared out the vehicles. There were two non-reported accidents of which I am aware. I was involved in one of these.

During the year 2016, state police reports indicate there were nine reported accidents, one involving a serious injury. This does not include all the fender benders what occur in which the parties involved do not contact the police but simply exchange information. There was one accident which was a hit and run, that local resident is prepared to come forward. There were no injuries however his vehicle was destroyed and the intersection was compromised for about an hour while the police took statements and cleared the wreckage.

During the year 2017 (to date) we have witnessed and documented over 12 fender benders. There was one serious injury accident in June which required state police, ambulance and fire truck. There were several property only damages which occurred when tractor trailers attempting to turn in the intersection hit (1) Mailboxes and wiped them out (2) Corner of Krumsville Inn (3) Ran over the items on the corner at the Antique shop (4) Ran over the stairs and hedge

Unfortunately, a relatively high number of crashes occur on I-78 between Lenhartsville and New Smithville often resulting in detoured traffic on Old 22. The current I-78/State Route 737 interchange reconstruction project and the 2019 I-78 mainline reconstruction project (including truck climbing lanes) are anticipated to improve traffic safety and reduce the number of incidents on I-78.

Since the time we had the first meeting in March 2017, at which time we became aware of the proposed warehouse project, we have been documenting I-78 detours through our intersection.

There have been twelve (12) ... since March 2017 ... an average of 1.4 per month.

We have videos posted on YouTube.

During all these detours, local fire companies had to provide personnel to direct traffic through the intersection to prevent accidents. During the last detour, the person directing traffic was almost ran over, twice, as impatient drivers chose to ignore his directions and gunned their vehicle through the intersection by passing the queued traffic. We have this on video as well.

We do not agree that the truck climbing lane will have any affect on the excessively large volume of tractor trailer traffic which has built up in the past five years due to the increase in warehouse development along the I-78 corridor. The high volume of traffic is the cause of the accidents and as more warehouses are built, the traffic will become denser, resulting in more accidents.

PennDOT policy is to act on HOP applications within 30 days of receiving. The developer's supplemental TIS analysis provided updated traffic counts that were performed in early May 2017 while school was still in session. The Department's independent data collection occurred April 27, 2017 to May 3, 2017, for comparison purposes and did not identify any major discrepancies. We believe the necessary traffic studies and analyses have been completed.

We disagree.

We have asked, begged and are now demanding that PennDOT come in and do a 45 day TIA on this intersection. A one day picture (TIS study) does not give a true view of this intersection. People that live and work in this community, and travel through this intersection on a daily basis, are VERY CONCERNED about adding warehouse traffic through this intersection. We are barely handling the current volume of traffic, which is mostly auto traffic.

We need PennDOT to use Common Sense in reviewing this intersection and how it does(not) handle traffic trailer traffic.

We had a PennDOT engineer visit our intersection. He has asked to remain anonymous due to reprisal and possible job loss, for coming out and giving us his opinion on this intersection. He stated that in all the HOP analyses he has performed over the past ten (10) years, at no time would an intersection like ours be approved for HOP without the developer making necessary changes to it.

He also stated that Route 737 north of the intersection poses concerns as it has no shoulder for breakdowns and the vehicles will be running on the road next to homes that are less than 20 feet off the edge. He clearly said that the developer should be responsible for making the necessary changes to improve the road prior to being HOP approved.

AND, he reviewed the current plans which include a 200' turning lane. During peak traffic times, he stated that 200' on the Rt 737 as it is now will not avoid road blockage as trucks come into the warehouse at an ingress which is 4% to 6% grade, 200 feet will handle approx two trucks and a third truck waiting to make the turn will be blocking any north bound traffic on Rt 737. During peak hours, this will become a dangerous point of travel

Department Regulations require developers to meet legal and engineering requirements that address impacts to roadways affected by their proposed land development. Based on our review, the installation of a traffic signal is not warranted at this time. Please note as a condition of our permit approval, the Developer is required to perform an after-study upon occupancy of the facility which will include collecting updated traffic counts and reevaluating the need for a traffic signal at State Route 737/Old 22.

WE DO NOT WANT A SIGNAL!

We are well aware of the “after study process” and have reviewed three different HOP permits which were given at a low volume, they turned out to have a high volume need and had to reapply. At no time during the reapplication was the warehouse closed nor was the surrounding community given any relief from the traffic volumes.

In one case, in Lower Macungie, PennDOT had to come in after the fact and spend “taxpayer money” to redesign the road.

WE WANT TO PREVENT AFTER THE FACT NEEDS.

We are providing you all the information you need – and adding some common sense – to explain to you that an HOP for a warehouse in this location is not safe and it is not going to work.

SO To prevent PennDOT from coming in after the fact and determining that this intersection cannot handle the traffic, and to prevent PennDOT from eminent domain our homes, we are showing you the facts as they are now, and the reality of what will happen if you add warehouse traffic.