

HOP CONCERNS WITH THE RESUBMITTED PLANS dated AUGUST 28, 2017:

1. The emergency access is on Rt 737, immediately next to the main entrance. According to the 2015 International Fire Code, emergency access needs to be separate from the main entrance by a calculated distance based on the size of the property-2015 International Fire Code, Appendix D Fire Apparatus Access Roads – specifically D 104.1 (Buildings exceeding three stories or 30 feet in height) which requires two means of fire apparatus access for each structure, D104.2 (Buildings more than 62,000 sq. ft) requiring two fire access roads (it does not meet the Exception for buildings up to 124,000 sq. ft that are allowed one approved fire access road when equipped with an automatic sprinkler system) and D 104.3 Remoteness, which states that the two required fire access roads must be located a distance apart not less than one half the overall diagonal of the dimension of the lot or area to be served, measured in a straight line between accesses, and the entirety of section D 105 Aerial Fire Apparatus Fire Access Roads.

The requirement for the location and number of Emergency Driveways for a Land Development is a Municipal Requirement. If the access is on a State Highway, it will be reviewed and approved in accordance with our regulatory and design standards.

At this time, the emergency access ingress is ten feet from the main ingress and does not meeting ICC Firecode regulations. The concern for this is that the emergency access will not meet the LOS as required by PennDOT and could possibly be compromised during an emergency need which will prevent emergency vehicle from entering the property

2. The plans do not provide off road space for tractor trailer, truck and van queuing, even one tractor trailer queuing on Rt 737 will cause traffic blockage, backups and endanger drivers.

A dedicated left-turn lane with 200- feet of storage will be constructed as part of this project.

That lane in no way will meet the requirements needed for queuing of tractor trailers as they need to enter the warehouse. There is not enough parking area on the plans for queued truck and they will be blocking traffic (see other notes and photos)

3. The plans do not provide alternate route planning for times when the intersection is compromised. Any traffic that would leave the warehouse and travel down Long Lane (a posted No Truck road) to exit onto Old 22, will be placing all traffic traveling on Old 22 in danger. The Long Lane/Old 22 intersection is lethal, and there have been deaths and serious injury accidents at this intersection. Any traffic that would leave the warehouse and travel north on Rt 737 through Stony Run will encounter a 90 degree turn, which is also unsafe for residents and their property in Stony Run.

An alternate route plan for this development's traffic is not a Department requirement. The Applicant has re-designed the driveway location on SR 737 to off-set its alignment with Long Lane and has eliminated the realignment of Long Lane which was previously requested by the Department. The existing configuration of Long Lane on SR 737 will remain and the Department has agreed to install additional signing at both ends of Long Lane to restrict its use by trucks.

WHY DOES PENNDOT NOT REQUIRE ALTERNATE ROUTE PLANNING? If the intersection is compromised, which it is NOW on a weekly basis, the only way to get around the intersection is off a deadly intersection from Long Lane and Old 22. Yes, there have been death induced accidents at that intersection, many injury accidents at that intersection, because there is no LOS for traffic exiting off Long Lane onto Old 22.

4. The LOS (line of sight) for the warehouse driveway do not meet the PennDOT required distances, even when using the calculation LOS instead of the stated LOS.

The required sight distance for the driveway location has been reviewed and verified by the Department.

We have your standards, and your waiver requirements. According to our own independent engineering review, the LOS of the driveway still falls 80' short of your calculated waiver requirements. We did see an PennDOT employee at the property two weeks ago doing more measurements, we would like to see PennDOT's measurements on the plan.

5. The proposed turning lane will accommodate 1.5 (one and a half) tractor trailers, so in the event that more than two tractor trailers are waiting to make the turn into the warehouse, traffic north bound on Route 737 will be compromised.

The dedicated left-tune lane is 200' long and will accommodate 2 to 3 tractor trailers.

No, no it will not. My own rig is 82 feet from nose to tail. Add a second truck, with space in between and you have used up the 200 feet. Add a third truck and it will be blocking the northbound lane of Rt 737

6. Route 737 does not have a shoulder from the proposed warehouse site south into the Route 222 bypass. We have Amish and Mennonite families in Greenwich Township which travel Route 737. Adding additional traffic to the

already high volumes from Krumsville to Kutztown will place them at a higher risk of being hit through the "S" turns

Route 737 is currently an approved truck route. While all of SR 737 is not ideally suited for trucks, there are currently no restrictions on trucks using SR 737. In this regard, an HOP applicant is not normally denied the ability to develop their property or gain access to the state highway.

Let's use some common sense. Our Amish and Mennonite families live north and west of this proposed warehouse and travel on Rt 737 daily for their needs. Adding additional traffic to the already dangerous levels on Route 737 is not acceptable.

7. Local businesses and residents already have issues with the current traffic levels and their parking areas. Customers and residents are unable to safely enter and exit the parking areas along Old 22 during peak times as traffic turns from Rt 737 coming off I-78 or heading to I-78. During an I-78 detour, exiting driveways and parking areas is impossible and the traffic exiting Rhoades Rd onto Rt 737 may wait in excess of 20 minutes to get clear of southbound traffic on Rt 737. Traffic queues at the intersection as many as fifteen (15) vehicles.

Queues will extend past several driveways and Rhoades Road due to the proximity of these intersections to the intersection of Old 22/SR737. 'Do not block intersection' signs may be used. However, the addition of a traffic signal to control all approaches to this intersection (including Rhoads Road and/or driveways) would result in undue delays for all approaches at all time periods of the day and night.

See our other documents

8. The 3% grade on the south bound Rt 737 into the stop sign at Route 737 and Old 22 will generate excessive noise as traffic increases from 2400 trips per day to the potential 4300 trips per day. Especially as the tractor trailer traffic increases. This grade currently poses issues with traffic during winter when snow and ice are on the roads. Adding heavier traffic will increase the dangers at this intersection as vehicles come down the hill to the stop sign.

Our Department will work with Township officials to implement a Brake Retarder Prohibition ordinance.

Brake retarder ordinance is great, but it does not change the grade on the road and the dangers of bad weather for vehicles coming down the grade into the intersection. COMMON SENSE

9. The residents will be exposed to unacceptable levels of noise generated by the increased traffic. Using the online HUD (Housing and Urban Development) Day/Night Noise Level Electronic Assessment Tool, the residents have determined that db levels of the developments ITE projected traffic combined with PennDOT February 2017 Traffic Volume map numbers on existing traffic may approach or exceed 80 db at the exteriors of buildings located on the intersection and along SR 737. HUD maximum recommended without mitigation is 65 db. The current levels using only the PennDOT AADT are approximately 56 db. We are also concerned with possible vibration damage due to road degradation due to tractor-trailer traffic, along with a decrease in air quality and the accompanying health issues that arise from it.

Our Department will work with Township officials to implement a Brake Retarder Prohibition ordinance.

Again, brake retarder ordinance does not address the noise generated by accelerating vehicles leaving the stop and entering into the intersection. An accelerating diesel engine can generate up to 120 decibels

We have reviewed all these items with our Board of Supervisors and our Township Planning Commission. We have provided our township with research and documentation of the devaluation of air quality, noise limits, property and property damages that will occur when 1984 trips per day are added to this intersection. We submitted a formal written request to our township Board of Supervisors to reach out to PennDOT, based on the research, data and documentation we obtained, and request that the HOP process include a PennDOT TIA. Our township public ally refused to be involved in the HOP process at the August 21, 2017 Planning Commission meeting.

We need PennDOT engineers to review these items as well. We have presented videos, photos, MY Vibration studies, HUD noise studies, ITE traffic studies and LVU Air Quality studies and we maintain that adding warehouse volume traffic to Krumsville will be dangerous to the personal safety, and health and welfare of the residents and will devalue the properties of the residents.