

Incorporated March 12, 1738

TINICUM TOWNSHIP

Bucks County

BOARD OF SUPERVISORS

163 Municipal Road
Pipersville, Pennsylvania 18947

ELEANOR BRESLIN, CHAIRPERSON
RICHARD ROSAMILIA, VICE CHAIRPERSON
JOHN COLE, MEMBER

July 11, 2024

Via Email Only (CommunityAffairs@drjtbc.org)

Jodee Inscho
Director of Community Affairs
Delaware River Joint Toll Bridge Commission
1199 Woodside Road
Yardley, PA 19067

RE: 2025 Uhlerstown-Frenchtown Toll-Supported Bridge Rehabilitation Project

Dear Ms. Inscho:

Please allow this letter to serve as Tincicum Township's official public comment submitted for consideration to the Delaware River Joint Toll Bridge Commission (hereinafter "DRJTBC") on the 2025 Uhlerstown-Frenchtown Toll-Supported Bridge Rehabilitation Project (hereinafter the "Project"). The comments, views, and opinions expressed herein reflect the comments, views, and opinions shared and unanimously held by all members of the Tincicum Township Board of Supervisors (hereinafter the "Board").

The Board appreciates the DRJTBC's interest in rehabilitating the nearly 93-year-old Uhlerstown-Frenchtown Bridge (hereinafter the "Bridge"), which connects Frenchtown Borough in Hunterdon County, New Jersey to Tincicum Township in Bucks County, PA. The Board recognizes the value and importance of this project which will result in the bridge being in a good state of condition and extend its service life so it will not need a major rehabilitation for at least 15 years. We support updating safety lighting, as further described below, and also support the widening of the three foot, nine inch-wide pedestrian walkway to five feet in light of the increased popularity of the crossing by pedestrians and cyclists. However, there are several aspects of the project that concern the Board.

EMERGENCY VEHICLE ACCESS DURING PROJECT PERIOD

Fire protection services for Tincicum 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 ~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 lane-width 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 <https://www.fws.gov/project/dark-skies-initiative>), and also ensure compliance with Tincum 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 Tincum 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 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 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, Tincum Township Liaison to LDW&S (*Via Email Only*)