

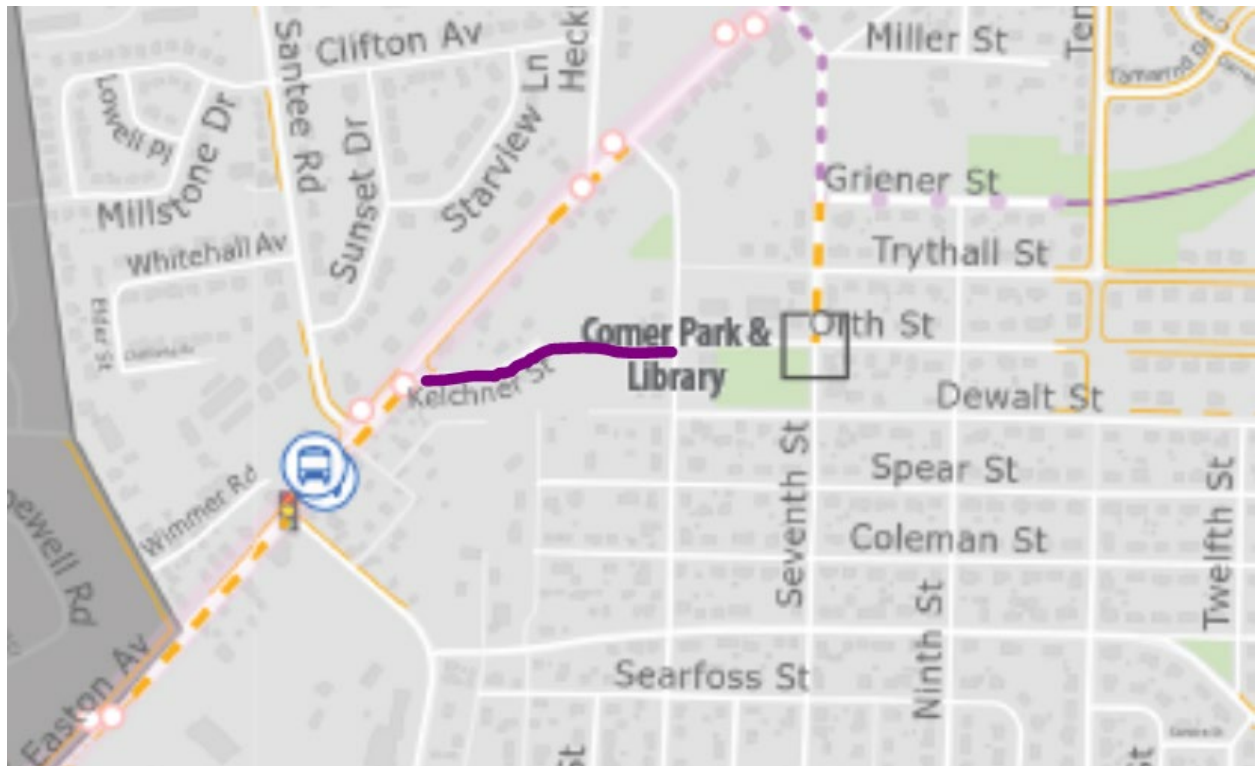
APPENDIX B



DRAFT REPORT PUBLIC REVIEW COMMENTS

Amanda,

This looks like a solid plan. Thanks for including us. One small connection that wasn't included but I still think would have a major impact is a bike ped bridge connecting Kelchner with Orth over Nancy Run. It appears that this is all public ROW and it's a relatively small project but would open up the whole interior trail network to the Butztown area. Is this something that could be easily added to the plan? Being located at our Butztown EBS station, I think this might be something we could include in our EBS station area plans when we seek federal funding.





Other than that, everything looks great.

Thanks again,
--AJ

AJ Jordan
Manager of Planning & Scheduling
Lehigh and Northampton Transportation Authority



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Bethlehem Township – Active Transportation Plan

Comments

As of 26 August 2023

Overall, the study did a good job in requesting resident feedback and proposing a variety of options to improve active exercising pathways in the township. The following are a few areas of concern to consider.

1. Proposed Traffic Circle at Stefko Boulevard and Easton Ave

This is a very dangerous proposal, which would make it more difficult for persons and vehicles trying to cross either roadway, outside of the proposed traffic circle. The current intersection has a four way traffic light with lighted pedestrian crossing signal. This allows pedestrians to press the crossing signal to safely cross the roadways. The current configuration should be kept for the following reasons.

Washington, DC is currently installing new HAWK traffic signals to improve safety. The Washington, DC DOT website stated that the purpose of this upgrade is: “To reduce the number of pedestrians killed and injured in crashes with motor vehicles.”

The Washington, DC DOT website also states: “Over the past five years, there has been an average of 653 crashes involving pedestrians and 334 crashes involving bicyclists each year in the District.”

<https://ddot.dc.gov/page/ddot-bicycle-and-pedestrian-safety>

Vehicles in the traffic circle have the right of way and might not stop for a pedestrian trying to cross the road. Bicyclists trying to ride around the traffic circle might be clipped by a vehicle trying to exit the traffic circle. If one studies the bicycle path map around Washington, DC and northern Virginia, a number of accidents occurred at the traffic circles where vehicles did not stop and hit a pedestrian or bicyclist trying to cross the roadway outside of the circle.

To build a traffic circle with the proper turn radius for tractor trailers would also result in closing adjacent existing businesses as they would have reduced parking spaces and set back distances from the roadway.

Vehicles trying to make a left hand turn out of the roadways or businesses along Stefko Blvd and Easton Ave would be more dangerous and difficult, due to the constant stream of traffic. Pedestrians would not have enough time to cross the roadway.

One should study the time it takes to cross the roadways as a pedestrian and observe the traffic flow, to understand how a traffic circle would create a far more dangerous situation for pedestrians along either roadway, outside of the intersection.

2. Path to D&L Trail

There are other projects, to including maintaining the existing trail, which would be better use of limited funding, rather than building a new trail to the D&L Trail. Creating a new trail would draw away declining volunteer resources from maintaining the existing trail network.

There is an existing roadway to access the same point on the D&L trail. Instead of creating a new trail entrance at Hampton Rd, persons can instead walk through Birchwood park, head west along Washington St, and then turn south along Sulac Rd. Sulac Rd then connects to Wilson Ave that is

parallel to the D&L trail. There is also only street parking for residents at the proposed new trail entrance at Hampton Rd. Visitors wishing to use this trail would be parking their vehicles in competition with the local residents. Creating a new trail increases the maintenance costs and draws resources away from the existing network, with no tangible benefit, as there is an existing road network connection.

3. Farmersville Rd to D&L Trail

Extending a potential sidewalk from the new Riverhill Estates Farmersville Rd sidewalk to the D&L Trail would be a significant maintenance concern. There is a sharp curve and steep slope once passing south of 1334 Farmersville Rd. This would be difficult to remove snow and apply de-icing salts along an extended sidewalk.

Stormwater runoff from Farmersville Rd would also be a concern. During heavy rain events, the rainwater runoff volume and velocity can create a concern of creating a “wave” than can possibly knock pedestrians down and wash them into the river. Small vehicles might also be washed away.

Currently, this is a low traffic volume roadway . Walkers and joggers moving up the very steep slope hill along the curve, should walk with traffic. There is a difficult blind spot for vehicles travelling down the hill at that sharp curve. There is no demand to extend the sidewalk here and the slopes are too steep for wheelchairs to go up the hill on a sidewalk.

Due to the very difficult steep slope, very few people currently walk or run up this hill. There are other locations where the money spent improving the trail network would benefit a significantly greater number of people.

Limited funds would be better spent improving the connection between the D&L trail and the Route 33 Boat Launch. This path has significantly more use and would have greater impact of dollar spent per user than expanding the sidewalk along Farmerville Rd to the D&L trail.

4. Nazareth Pike Sidewalk Connections

4A. Traffic entering and exiting Route 22 to/ from Nazareth Pike makes left hand turns to and from Highland Drive dangerous. Extending any sidewalks along Nazareth Pike to Highland Drive creates an increased risk of a pedestrian injury or accident. This location is too dangerous for pedestrian traffic to cross.

There is an existing roadway from Highland Dr. to the Bethlehem Square shopping center. The safest pedestrian crossing across Nazareth Pike would be at the Bethlehem Square shopping center traffic light. Pedestrians crossing here would have a lighted crosswalk and stopped vehicle traffic. This should be the designated pedestrian corridor to avoid vehicle traffic.

Once on the western side of Nazareth Pike, pedestrians will be able to walk through the former K-Mart parking lot to access the Housenick Park trail to Christian Springs Rd to the Brodhead Rd industrial center. This is a much safer alternative than trying to extend sidewalks along Nazareth Pike to Brodhead Rd.

Exercising along high traffic roadways exposes people to air pollution. The goal should be focusing pedestrian and bicycle traffic away from high volume roadways to lower traffic volume pathways for safety and better environmental health.

4B. Extending sidewalks along Nazareth Pike to Christian Springs Rd, across from the shopping center, would increase the risk of pedestrian injury or accident. The current volume of vehicle traffic makes it dangerous for vehicles to safely make left turns from the shopping center or Christian Springs Rd. The future nearby gas station will significantly increase the risk of accidents due to the volume of traffic.

If this intersection is considered for pedestrian access, a traffic light and lighted pedestrian crossing is needed.

5. Washington Street Bicycle Boulevard Treatment

There is no need to spend money or expend fuel to paint bicycle path symbols on this roadway. This is a low volume roadway that is wide enough for pedestrians, bicyclists, and local residents. There is extremely low volume vehicle traffic along Washington St south of Freemansburg Ave. Why expend carbon energy on something that is not needed, does not have a high safety risk, nor have the volume of use? Traffic calming construction is not needed along Washington St. At most, "Share the road" traffic signs can be posted at the existing stop signs.

The local residents currently park along Washington St and painting bicycle path symbols would take away their on-street parking. Washington St is 36-ft wide and there is sufficient space for the residents to park cars and very low volume traffic for bicyclists to ride past the park cars without concern of being hit by a passing vehicle.

There is no reason to spend money or use fuel to paint needless bike symbols on Washington St. The ratio of dollar spent per bicyclist would show that there are other locations or other improvements that would have a significantly greater impact, especially on the roadways that are narrower and have frequent truck traffic.

A bicycle and pedestrian bridge across Rt 33 at Emerick Blvd would be a far greater impact and significantly improve safety. Freemansburg and Easton Avenues have too high volume traffic, too narrow shoulders, and are dangerous for pedestrians and bicyclists. The on and off ramps from Rt 33 make non-vehicle traffic along these roadways unsafe. Virginia DOT has built pedestrian bridges over the interstate highways for this safety reason. Crossing at the off ramps is too dangerous and by directing pedestrian traffic away from the ramps, it eliminates the risk.

The money and vehicle fuel used to paint needless bike path symbols on Washington St, would be better spent on maintaining the existing roadway instead. There are numerous asphalt cracks and spalling along the roadway.

Making this roadway a designated bike blvd might open the township to lawsuits in failing to maintain the roadway to a constantly smooth surface for bicycle use. Washington St, north of Freemansburg Ave, has several sections where the top wearing course pavement layer should be milled and repaved. The crack filling over the years has not prevented the asphalt from wearing apart. Washington St, south of Freemansburg Ave, hasn't been crackfilled in several years.

Traffic counts along Washington St would show that there is no need to paint Washington St as a bicycle blvd. If one studies the times that this roadway is used for bicycle traffic, it is during the weekend early daylight hours, especially Sundays. There are periods of time where there are no vehicles driving along Washington St during the Sunday mornings.

Even during the weekday evening rush hour traffic, the existing stop signs and limited traffic make it safe for pedestrians to walk along the roadway. One should survey or observe the local neighborhood residents if they believe that marking the roadway for bicycle traffic is necessary or repairing the roadway is more important and better use of limited taxpayer funds. Many of the residents walk along the roadway rather than on the sidewalks.

What is needed at Easton Ave and Washington St is a corner street light, so that drivers can clearly see the roadway and any pedestrians. A traffic light at the intersection of Washington St and Freemansburg Ave might be needed to allow safe pedestrian and bicyclist to cross Freemansburg Ave. There are times during the evening rush hour that the roadway does not have a break in traffic for more than two minutes.

This roadway is however, safer than trying to walk or bike along Willow Park Rd or Farmersville Rd. Those roadways are narrow, have a very small shoulder, and greater vehicle traffic volume. They are also the main north south connection roads to Easton Ave and Freemansburg Ave.

6. Freemansburg Ave Sidewalk Connection from the Trailer Park to Madison Farms

Trying to extend the sidewalk along Freemansburg Ave might not be a top priority for those living at the trailer park. People with lower incomes value their time just as much as wealthy persons and it is not realistic that a large number of persons would walk to the Madison Farms shopping center to buy groceries and carry them back. Trying to carry a large pack of toilet paper, eggs, and gallons of milk and juice in the winter or summer for a quarter mile or longer is difficult.

Many Madison Farms residents drive their car to the supermarket and back, either due to the weather, time, and/ or volume of groceries purchased. One should survey the Madison Farms pedestrian traffic and the trailer park residents to determine the cost vs benefit analysis if extending the sidewalk to the trailer park would see active use or be wasteful spending of fuel and natural resources to build, perform snow removal, and maintain. The township already has difficulty in maintaining the existing infrastructure.

Instead, a multi-purpose path that connects the trailer park to the existing network would be better use of money. The residents would have the opportunity to safely access the same recreational infrastructure as the rest of the township residents. It is too dangerous trying to ride a bicycle along Freemansburg Ave.

7. Closing Comments

Before the township spends money to expand the pedestrian and bicycle paths, a cost versus benefit analysis should be performed. Projects that would see higher volume use and create safer conditions should be prioritized over projects that do not improve safety or not be used.

An example would be improving the pedestrian crossing at Bethlehem Square Park and Nazareth Pike over extending the sidewalk and trying to create a new pedestrian crossing at Nazareth Pike and Highland Dr. Another example would be extended the sidewalks along the top northern portion of Farmersville Rd, south to Easton Ave. A new lighted crosswalk would be needed at the high school exit to allow students to safely cross Farmersville Rd. Trying to cross Farmersville Rd at the intersection of Easton Ave would be dangerous due to vehicle traffic turning onto Farmersville Rd.

Washington, DC is currently prioritizing improving the safety of designated pedestrian corridors with new lights and signals. From the Washington, DC DOT website, they mention that “On average, there are approximately 650 pedestrian crashes per year in the District and approximately 15 pedestrian deaths.” <https://ddot.dc.gov/page/pedestrian-program> Their extensive sidewalk network has not made it safer for pedestrian traffic.

New York City has also seen a massive increase in pedestrian accidents due to people not obeying traffic signals or laws. Creating or designating bike paths or pedestrian corridors has not reduced the number of accidents. A 2022 news article reported that: “Traffic accidents killed 273 people in New York City last year, making 2021 the deadliest year on the city’s streets in recent history, according to data released by transit non-profit Transportation Alternatives on Wednesday.” This is despite the previous NYC Mayor’s “Zero-Vision” safety program.

<https://www.nbcnewyork.com/news/local/last-year-was-deadliest-on-nyc-streets-in-nearly-a-decade-report-claims/3516683/>

When travelling along Pembroke Rd and East Broad St in the City of Bethlehem, I have observed on different occasions, two different persons using motorized wheelchairs facing incoming traffic on the roadway, not the sidewalk. The existing sidewalks have too many inconsistent surfaces with concrete panels raised due to tree roots and weather impacts over the years.

Expanding new sidewalks does not make it safer for use along major roadways, as the high volume traffic roadways still present a risk of accident. Identifying main pedestrian corridors and maintaining them should be a higher priority.

Pedestrian and bicycle corridors should be focused on lower volume roads for safety and less air pollution. Riding or jogging along Freemansburg Ave or Easton Ave is dangerous and bad for the lungs. Extended sidewalks increases the impervious coverage, while applying de-icing salts creates water pollution concerns, along with damaging the concrete sidewalks that make it dangerous for wheelchairs to use. This then increases the long term maintenance costs and carbon footprint to replace damaged sections.

Building multi-purpose asphalt paths for both pedestrian and bicycle use would be better than building more sidewalks. These paths would take the bicycles off the roadway, thereby reducing the risk of being sideswiped by a vehicle, and be a level surface, therefore easier to maintain and repair than concrete sidewalks. This is what many residential developments have in western Maryland, within the Washington, DC region.

The report makes many good suggestions overall, but the township should be cautious and carefully examine the long term maintenance cost, overall carbon footprint to build and maintain, safety impacts, and realistic use before implementing.

Respectfully yours,

David Wong

Bethlehem Township resident



STEVEN GLICKMAN
Chair

CHRISTOPHER AMATO
Vice Chair

KEVIN SCHMIDT
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October 30, 2023

Ms. Leslie Walker, Chair
Bethlehem Township Planning Commission
4225 Easton Avenue
Bethlehem, PA 18020

**RE: Bethlehem Township Active Transportation Plan
Bethlehem Township
Northampton County**

Dear Ms. Walker:

The Lehigh Valley Planning Commission (LVPC) considered the application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happened during the Committee meeting and we encouraged your virtual participation. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting
October 24, 2023 at 11:00 AM
<https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
October 26, 2023 at 5:30 PM
<https://lvpc.org/meetings.html>

The Bethlehem Township Active Transportation Plan September 2023 serves to explore opportunities to expand connections for active transportation such as biking, walking/rolling, and accessing transit for people of all ages and abilities. This includes cyclists from casual to advanced, and all levels of walkers from for leisure to those who walk for commuting. The vision and goals of the Active Transportation Plan align with many of the goals and policies outlined in *FutureLV: The Regional Plan*.

The Active Transportation Plan focuses on a range of ideas improving the current bicycling and pedestrian facilities, developing additional resources such as shared paths and bike lanes, and exploring ways to close existing gaps in infrastructure to enhance and expand the existing network connections. Several priority areas include locations where an obstruction exists, or that have no or limited access to vital locations such as shopping centers, access points for public transportation, and identified areas where not having a connection creates inaccessibility. While identifying these gaps the Active Transportation Plan also includes considerations for the Township's unique characteristics and topography.

The LVPC offers the following comments:

Bethlehem Township Active Transportation Vision Statement

The vision statement of the Bethlehem Township Active Transportation Plan is “A safe, accessible, and connected active transportation network where people of all ages and abilities can comfortably reach key destinations and resources throughout the township and beyond.” This project vision strongly aligns with Goal 2 of *FutureLV: The Regional Plan* to have ‘a seamless network where roads, trails, sidewalks and technology connect everyone to every place.’ Additionally, the Vision Statement supports Goal 2 by outlining ways in which a transportation system will be welcoming to drivers, walkers, and rollers—regardless of age, income, or ability (*FutureLV* Goal 2 Page 57).

The Bethlehem Township Active Transportation Plan provides a strong vision for the area’s active transportation future with thorough, in-depth, and well-researched plan content. The LVPC commends the inclusion of innovative tools, such as the Active Transportation Toolbox, that address the modern-day needs of the region, while considering the age, ability, demographic, and needs of its residents, demonstrating the use of best practices in development patterns and community growth (Policy 1.4 *FutureLV*).

The LVPC suggests the Township review the application of the definitions and terms used in the paragraph section outlining goals and actions. Goals are statements of desired effects of actions. Clarification of the terms and their definitions will help to strengthen both the Goals and Actions along with the overall Active Transportation Plan. The Township may wish to use the Goals listed in *Walk/Roll LV*, the Lehigh Valley’s first-ever transportation network masterplan, which focused on creating a connected road, trail, sidewalk, and transit network. Many areas strongly align with those listed within the Township Active Transportation Plan and the use of goals and actions in the document could be applied by the Township if found to be a helpful guide which may serve to further strengthen the Township long-range plan.

Ease of Application and Comprehension

The LVPC recommends minor clarification for several sections within the Active Transportation Plan for ease of application and comprehension for the Township, residents, and other entities that may use the plan. Explaining abbreviations and acronyms used within the text, and clarifying technical terms by defining or explaining them would create a reader-centered document supporting universal design, (of *FutureLV* Policy 5.2). Additionally, the use of subheadings within the Table of Contents would improve the ease of use of the plan to locate specific sections without difficulty.

The LVPC also recommends that the Township remove any redundant, inconsistent language or wording that may be inconsistent with the spelling used in other locations

within the plan, and ensure that all grammar, spellings, and tenses are uniformly applied throughout to further improve ease of understanding and application. An attached sheet for minor language recommendations has been included as [Appendix 1](#).

Bethlehem Township Active Transportation Goals

The Active Transportation Plan includes several program recommendations, including making a commitment to Vision Zero, a strategy to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all. The LVPC applauds this commitment which aligns with Policy 5.1 of *FutureLV* to reduce bicycle and pedestrian fatalities to zero. Additionally, ‘Improve safety for pedestrians and people who ride bikes at crossings, especially those along major arterial roadways’ (Bethlehem Township Active Transportation Plan Network Page 51) aligns with *FutureLV* to ‘enhance public transit service and pedestrian and bicycle facilities’ (of Policy 2.4).

Another project goal is to ‘improve connections to transit services and transit-supportive infrastructure’ (Bethlehem Township Active Transportation Plan Network Page 51), which is consistent with the *FutureLV*’s vision for the Lehigh Valley to ‘improve connections between bus stops and pedestrian and bicycle infrastructure’ and ‘encourage the use of universal design’ (of Policy 5.2).

‘Create comfortable connections for walking and biking along lower speed, lower volume residential roadways’ (Page 51) is a goal of the plan, which ties into *FutureLV: The Regional Plan* to implement complete street and traffic-calming measures’ (of Policy 5.1). The LVPC recommends tying specific actions to this and other goals listed that will create the desired effects and finding ways in which these outcomes can be linked to other parts of the Regional Plan to support the Township’s goals and strengthen steps taken to realize them.

Another example of where the Active Transportation Plan and the Regional plan could link is the Active Transportation goal to “Expand walking and biking access to existing trails, parks, and other recreational resources to promote healthy lifestyles and improve public health” (Bethlehem Township Active Transportation Plan Network Page 51) and *FutureLV* Policy of 5.3 to “improve access to green spaces” and “strengthen sidewalk, bike route, and trail infrastructure” (5.3).

The additional goals listed in the Active Transportation Plan align with other *FutureLV* goals including “directing growth by establishing a network of mixed-use Centers and mixed transportation Corridors” (of Policy 1.2) and “develop a mixed-transportation network, optimize roadway capacity and encourage alternative travel options” (of Policy 1.2).

Policy 2.2 of *FutureLV* is to ‘provide a safe, well-maintained transportation network to move people and goods efficiently while capitalizing on existing infrastructure’. Bethlehem Township is acting on this through identifying existing gaps for active

transportation connections which is the first step in growing the Township's transportation network and expanding active transportation infrastructure. The LVPC commends the vision to connect active transport to the larger network. This will connect residents to resources and areas both within the Township and beyond to the larger Lehigh Valley while outlining specific ways to achieve this while creating a safe, reliable, and efficient transportation network that aligns with the character of the community.

Off-Road Pedestrian and Bicycle Facilities

The LVPC encourages the Township to utilize the 2020 *Walk/Roll LV* to support the descriptions on pages 54-63 of the Township's Active Transportation Plan. Additionally, the LVPC recommends that the Township verify that the dimensions that are outlined within the Active Transportation Plan align with those that are noted in *Walk/Roll LV*.

Church Road and Bethman Road

Bethlehem Township's project list to improve access and safety is applauded by the LVPC. One of the projects listed, Church Road and Bethman Road, is an area of concern, given the improvements proposed. If improvements were made this location would still not be well-suited for bicycle traffic, given the narrowness of the road, and the low visibility of the shoulder. Additionally, the vehicle traffic from the country club and high school makes this location inhospitable to bicyclists and only minor improvements will not be able to alleviate the safety concerns. The LVPC calculated only .7 miles of area that would be improved which varies from the 1.07 potential liner miles that are listed in the Active Transportation Plan on page 109.

Transportation Comments

The Bethlehem Township Active Transportation Plan includes a map of Roadway Ownership by Functional Class on pages 30-31. Ownership of a roadway is independent of functional classification and the LVPC strongly encourages that these distinctions be clearly noted to avoid confusion to the reader. The LVPC recommends either splitting the map or clarifying between the two graphically, to visually distinguish the difference between Ownership and Functional Class.

There is a proposed shared-use path along the D&L Trail depicted on pages 64 and 65 of the plan. It is unclear if this proposed trail will meet the existing D&L Trail which runs parallel to the Lehigh River as a connection to the Trail, or if the proposed trail will run parallel to the D&L Trail. If the intention will be to connect to the D&L Trail, it is unclear to what extent the D&L National Heritage Corridor group is involved with the proposed abutting trail. As noted in the Active Transportation Plan, this section of the D&L Trail is located next to the Lehigh River, which has experienced flooding at times making this section of the Trail impassable and difficult to utilize. It is not stated in the Active Transportation Plan if the proposed trail is intended to be a connection or if the purpose would be to mitigate this issue. The LVPC recommends clarifying whether it may also be subject to the flooding issue, or what the maintenance plan is for the new trail.

The LVPC applauds the inclusion of requirements to evaluate multimodal access and circulation as part of traffic impact studies on page 125. The LVPC strongly

recommends that a disclaimer be added to the Traffic Impact Studies section stating that coordination with PennDOT will be required if working on state-owned roads.

The LVPC also recommends that the Policies and Procedures for Transportation Impact Studies Related to Highway Occupancy Permits, PennDOT Pub 282 be used for Traffic Impact Studies as a guideline to help account for situations when certain uses that may not meet the threshold but that have peak hours that do meet the threshold, such as drop-off and pick-up times at schools.

On pages 34-35, it should be noted that the reportable crashes within Bethlehem Township should be updated to reflect the 2022 data that is available on PennDOT's Pennsylvania Crash Information Tool, as the Active Transportation Plan has not been adopted yet. The map on these pages also should be updated accordingly, and it should be more clearly shown that there were no pedestrian crash fatalities within the township during this data range, as it is confusing that the 'Bicycle Crashes' legend item has Fatal Injury and the 'Pedestrian Crashes' does not.

Safety Analysis

The Safety Analysis listed on pages 34-35 of the Bethlehem Township Active Transportation Plan uses the five-year period between 2017-2021. Since the plan has not yet been adopted, the LVPC recommends that the Township consider updating this section to review the now available 2022 data which is available on PennDOT's Pennsylvania Crash Information Tool. This would allow the maps to be updated with the most recent data and support the Active Transportation Plan to 'Improve safety for pedestrians and people who ride bikes at crossings/major arterial roadways' (Bethlehem Township Active Transportation Plan Page 51). Any incident of a pedestrian crash fatality should be included and updated to be reflected in the map. If pedestrian crash fatalities have remained at zero in the updated data, the LVPC suggests that the 'Pedestrian Crashes' legend lists Fatal Injuries as zero to prevent possible confusion as this is listed under Bicycle Crashes, and not pedestrian and may make comparison confusing to the reader.

Smart Growth/Streetscape Enhancement Corridors

The LVPC encourages the Township to compare the potential arterial roadways depicted on Page 76 of the Active Transportation Plan with *Walk/Roll/LV* to ensure that they align. The LVPC commends the Three- and Four-Lane Cross Sections shown and would like to offer that this scenario would be possible on all three of the roadways listed under the Smart Growth/Streetscape Enhancement Corridors section on Page 76. Neither of the two crossing sections shown includes a location for a bike path or bus lanes, and the LVPC recommends incorporating these into the images.

Sidewalk And Trail Inventory

The sidewalk inventory listed in the Bethlehem Township Active Transportation Plan on page 39 varies from the 2016 Regional Sidewalk Inventory Sidewalk Inventory listed in Appendix 1 of *Walk/Roll LV*. The LVPC recommends verifying the numbers as the

variance shows a significantly different number of sidewalk miles in the Township than are recorded in Walk/Roll LV.

The LVPC also strongly encourages coordination with Lehigh Valley Greenways to further the trail connections highlighted within the Bethlehem Township Active Transportation Plan.

Mapping

The LVPC commends the use of available tools such as maps and locator maps, demonstrating an efficient and coordinated development pattern (Goal 1) and the use of best practices in development patterns and community growth (of Policy 1.4).

The LVPC suggests that the Township consider adding historic sites to the Existing and Proposed Township Connections and Proposed Connections Map.

On page 125 of the Active Transportation Plan, the Township notes that it is considering adopting an Official Map. The LVPC strongly encourages adopting an Official Map which is particularly effective for achieving transportation and community facility goals, providing for coordination of public and private goals, and providing an effective method for implementing the Active Transportation Plan and advancing future land use goals.

Partner Coordination

The LVPC is supportive of Bethlehem Township as it looks to implement this Plan and commends the inclusion of planned coordination with both PennDOT and the Lehigh Valley Planning Commission listed on page 144 of the Active Transportation Plan. The LVPC strongly encourages coordination with Lehigh Valley Greenways <https://lvgreenways.org/> and the Department of Environmental Protection Growing Greener Plus Grant Program <https://www.dep.pa.gov/Citizens/GrantsLoansRebates/Growing-Greener/Pages/default.aspx> to further the trail connections highlighted within the Active Transportation Plan. The LVPC is available as a resource to Township staff to discuss implementing planning topics, and LVPC's guidance documents.

Municipalities, when considering comprehensive plans and updates, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

Please send a copy of the adopted Multi-Municipal Comprehensive Plan adopted by the Municipality, per requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,



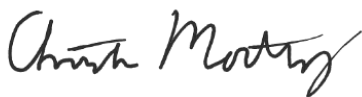
Bambi Griffin Rivera
Senior Community and Regional Planner



Geoffrey A. Reese, PE
Master Planner and Engineer



Evan Gardi
Transportation Planner



Christian Martinez
Environmental Planner



Mackenzie Geisner
Geographic Information Systems Planner

cc: Amanda Jensen, Bethlehem Township Planning Director;
Doug Bruce, Bethlehem Township Manager;
Samantha Smith, Bethlehem Township Zoning Officer;
James L. Broughal, Township Solicitor

Attachment One
Minor Language Changes Recommendations

Page Number	Location on Page	Concern/Recommendation
Page 2	Acknowledgements	Missing an 'e'
Page 2	Molly	Has extra letter
Page 4	Streetscapes Enhancement Corridors	"e" and "c" should also be capitalized
Page 9	Increased social cohesion/reduces isolation	Reduced as opposed to reduces
Page 11	Map key lists LANTA EBS Stop	EBS acronym not explained
Page 12	peoples'	people's
Page 12	The Northampton County	Remove 'the'
Page 13	A similar set of metrics are mentioned, but no specifics to what those are is mentioned	Include reference for the reader to locate the metrics referred to
Page 21	year	Should be plural
Pages 30-31	Functional Class and Roadway Ownership	Roadway ownership is independent of functional classification
Page 34	A vehicle must be towed from the scene and cannot be driven	Reverse order "A vehicle cannot be driven and must be towed from the scene"
Page 34	bicycles	bicyclists
Page 36	Image for in sidewalk gap	This example is an isolated sidewalk rather than a gap in the sidewalk
Page 46	Lake of Connections	Punctuation needed at the end of sentence
Page 51	Goals and Actions	Goals are statements of desired effects of actions
Page 51	Improve connects	Improve bike and pedestrian network connections
Page 54	Verge	Used multiple times throughout section. -- A technical term not commonly used. May wish to use a more commonly known term for accessibility of all readers

Page 56	Recommend proposer lateral position for bicyclists	Explain how the physical space does this
Page 58	Travel lanes shorten crossing	Travel lanes, shorten crossing
Page 60	Setback	Set back – two words
Page 76	William Penn Highway	Misspelled
Page 76	Freemansburg Avenue	Misspelled
Page 82	Under	Should not be capitalized
Page 82	D & L trail	Trail should be capitalized
Page 83	MUTCD	To help create accessibility for all readers it is recommended to omit the use of acronyms that are not being repeatedly used throughout the text.
Page 83	Bicycles May Use Full Lane	Township may wish to note that this is legally true in PA on any road
Page 104	Painted gore markings	gore markings term unknown
Page 117	Easton Road/William Penn Highway	Avenue not Road
Page 119	#3 Compile and Develop	Compiling and developing
Page 124	enhanced bus service	Enhanced Bus Service
Page 124	Bus shelters requirement	Shelter should be singular
Page 124	Overlay District with by the following	Omit “by”
Page 126	Bicycle	Should be plural
Page 128	Complete Streets policies are documents that identify	“are documents that” should be deleted
Page 145	enhanced bus service	Should be capitalized