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Chair

CHRISTINA V. MORGAN
Vice Chair

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Treasurer

BECKY A. BRADLEY, AICP
Executive Director

ENVIRONMENT COMMITTEE MEETING
Tuesday, July 22, 2025, 10:30 AM
AGENDA

THE MEETING CAN BE ACCESSED AT <http://www.tinyurl.com/LVPC2025> OR VIA PHONE
610-477-5793 Conf ID: 651 626 091#.

Roll Call

Courtesy of the Floor

1. Staff Introduction:
 - a. David Cohen, AICP, Director of Regional Planning

Committee Business:

1. *ACTION ITEM*: Delaware River Basin Commission Review – Application to Renew Approval of Existing Wastewater Treatment Plant and Discharge – Li'l Wolf Mobile Home Park Wastewater Treatment Plant (CR)
2. *INFORMATION ITEM*: Greater Lehigh Valley Regional Climate Action Plan – Approaches to Evaluating Costs (SK/GCR)
3. *INFORMATION ITEM*: Priority Climate Action Plan for Transportation Decarbonization Implementation (BB/FU)

Next Environment Committee Meeting
August 26, 2025, 10:30 AM



Lehigh Valley Planning Commission

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July XX, 2025

Ms. Pamela Bush
Delaware River Basin Commission
P.O. Box 7360
West Trenton, NJ 08628-0360

**Re: DRBC Review – Application to Renew Approval of Existing Wastewater Treatment Plant (WWTP) and Discharge – Li'l Wolf Mobile Home Park WWTP
North Whitehall Township, Lehigh County
Docket No. D-2015-005 CP-3**

Dear Ms. Bush:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on July 24, 2025, reviewed the above-referenced application. Our review was based on the adopted plans and policies of the LVPC. We offer the following comments.

The purpose of the application is to renew the approval of the applicant's existing 70,000 gallons per day wastewater treatment plant (WWTP) and related discharge. The average flow to the plant is approximately 56,000 gallons per day. The plant serves approximately 270 units as well as the clubhouse at the Li'l Wolf Mobile Home Park and is located at Leopard Circle in North Whitehall Township, Lehigh County. No expansion or modification of the treatment plant is proposed with this application.

The applicant's wastewater treatment plant will continue to serve the needs of its customers and aligns with the *FutureLV: The Regional Plan* action to "protect the quality and quantity of surface water and groundwater" (of Policy 3.2). Per DRBC documentation, no substantial adverse impacts are anticipated with the continued operation of the plant. In addition, DRBC may modify or suspend its approval or any permit condition to mitigate adverse impacts.

Please call me if you have any questions regarding these comments.

Sincerely,

Corinne Ruggiero, SEO
Environmental Planner

Lehigh Valley Transportation Study's Federal Fiscal Year 2025, 2026, 2027 and 2028 Carbon Reduction Program (CRP) Disbursement Program

Executive Summary

Carbon Reduction Program (CRP)

The Carbon Reduction Program (CRP) fund is a federal cost reimbursement program, distributed by the Federal Highway Administration (FHWA) and administered by the Pennsylvania Department of Transportation and Metropolitan Planning Organizations (MPO) across the commonwealth. The CRP was authorized under the Federal Infrastructure Investment and Jobs Act (IIJA) with the purpose of reducing Carbon Dioxide (CO₂) and greenhouse gas emissions (GHG) from the nation's transportation system. The CRP requires states to develop a Carbon Reduction Strategy (CRS) and offers formula funds for projects that reduce GHG emissions. Funds are allocated to the states based on the state's population and further allocated to the MPOs in the states based on the population of the state's urban areas (UAs).

Projects utilizing CRP funds must meet the program's eligibility requirements. The CRP guidance allows MPOs to develop a regional funding strategy that supports the state CRS goals and prioritizes funding for transportation projects that are relevant to the region's demographics and emissions reductions goals.

The Lehigh Valley Carbon Reduction Funding Strategy

The Lehigh Valley's regional carbon reduction strategy for transportation is outlined in the *Lehigh Valley Priority Climate Action Plan for Transportation Decarbonization* (PCAP) adopted by the LVTS on April 17, 2024, and the Lehigh Valley Planning Commission on February 22, 2024. This *Priority Climate Action Plan* (PCAP) is supported the *Regional Greenhouse Gas Inventory*, most recently published on September 24, 2024. These data and policy documents are supported by the Metropolitan Transportation Plan, *FutureLV: The Regional Plan* (2023), where the transportation priorities from safety to asset management to growth management to air quality are balanced and prioritized for federal and state funding through the LVTS.

Specific transportation emissions reduction goals in the PCAP, if implemented through a combination of efforts and funding sources, including the Carbon Reduction Program funding allocated through the IIJA, can reduce transportation emissions by nearly 300,000 metric tons of carbon dioxide equivalent (MTCO₂e) by 2030 and more than 321,000 MTCO₂e by 2050. It represents roughly 12% of the 2.7 million MTCO₂e being created now by transportation sources, according to the most recent LVPC Greenhouse Gas Inventory. The goals of the PCAP are to reduce carbon emissions from transportation projects, invest CRP funds equitably, and improve safety. They reflect the goals and purpose of the federal CRP and the Pennsylvania state CRS.

In addition, Lehigh Valley Planning Commission (LVPC) staff researched multiple state and federal sources (specifically, Federal Carbon Reduction Program and Pennsylvania Carbon Reduction Strategy) to develop a set of strategies that reduce CO₂ emissions from the transportation network. The regional carbon reduction strategy is aligned with and supports the priority strategies outlined in the Pennsylvania state CRSs' as well as Lehigh Valley PCAP. The Lehigh Valley's first-ever PCAP is designed to improve air quality, support the economy and economic development while improving public health and safety through mode shift, using

technology to reduce congestion, and creating green infrastructure along the region's busiest highways, among other strategies.

The transportation sector was chosen as a focus of the PCAP as the Lehigh Valley grows in terms of population and is experiencing mass reindustrialization. In addition, priority focus on the transportation sector allowed the LVTS to develop a specific plan for the allocation of the Carbon Reduction Program funding managed through the Metropolitan Transportation Plan and the Transportation Improvement Program. This specific plan supports the long-range transportation plan, *FutureLV: The Regional Plan*, and its fiscally constrained list of regionally significant transportation projects.

CRP Project Selection Process

The Lehigh Valley Transportation Study (LVTS) developed a transparent, data-driven project selection process for allocating funds from the federal Carbon Reduction Program (CRP). This process was guided by federal, state, and regional priorities, including *FutureLV: The Regional Plan*, the Lehigh Valley PCAP, the Pennsylvania Carbon Reduction Strategy, and relevant federal regulations (23 U.S.C. 134 and 175).

A publicly advertised and accessible LVTS Technical Committee workshop was held on June 25, 2025, to:

- Discuss federal program requirements and guidance, including example projects eligible for funding provided by PennDOT
- Utilize known federal project selection criteria, discuss additional regional criteria and weight the same to create a comprehensive methodology for project selection
- Develop and review the list of eligible projects from *FutureLV: The Regional Plan*, including project sponsor information related to project readiness collected in May 2025
- Select project based on the developed selection methodology
- Vote to recommend selected projects to the LVTS Coordinating Committee.

Projects were limited to those already identified in *FutureLV* through previous planning processes, including the 2019 Call for Projects and the 2023 Transportation Needs Assessment.

Introduction

Carbon Reduction Program (CRP)

The IIJA was passed by the U.S. Congress in 2021. It includes \$6.4 billion for the CRP to fund projects that directly reduce CO2 emissions from the nation's transportation system. The CRP provides formula funds to states, "to reduce transportation emissions through the development of state carbon reduction strategies and by funding projects designed to reduce transportation emissions". The IIJA ultimately resulted in the allocation of \$265 million in CRP funds to the Commonwealth of Pennsylvania. 65% of a State's CRP apportionment is to be obligated in the following areas in proportion to their relative shares of the State's population. [§ 11403; 23 U.S.C. 175(e)(1)(A)] Funds attributed to an urbanized area may be obligated in the metropolitan area established under 23 U.S.C. 134 that encompassed the urbanized area [23 U.S.C. 175(e)(2)]. The remaining 35% of the State's CRP apportionment be obligated in any area of the State. [§ 11403; 23 U.S.C. 175(e)(1)(B)].

Lehigh Valley Transportation Study Apportionment

In the case, of the Lehigh Valley, the population exceeds 200,000 and PennDOT distributes CRP funds to the LVTS based on a formula derived from federal regulations.

The MPO is responsible for programming the CRP funds allocated to its region and may use them for any eligible CRP projects within its jurisdiction. Additionally, eligible entities in a region may apply for statewide CRP funds, depending on project eligibility and available funding.

LVTs is committed to reducing emissions from the transportation sector. The LVTs has incorporated the goals of reducing emissions in the *FutureLV: The Regional Plan* and PCAP. Currently, through coordination with PennDOT, District 5 -0 and Central office, **\$2,166,000** has been identified for funding Lehigh Valley CRP projects for the Federal Fiscal Year (FFY) 2025 allocation, **\$2,219,000** in FFY 2026, **\$2,219,000** in FFY 2027, and **\$2,219,000** in FFY 2028. It is of note that CRP funds are divided into two categories: Urban (CRPU) and general (CRP) categories. CRPU funds are required by the federal government to be utilized in urbanized areas in accordance with approved maps based on the US Census. General CRP funds may be utilized anywhere in the metropolitan planning area boundary, specifically, Lehigh and Northampton counties. Both CRPU and CRP funds may be awarded to qualified projects after going through a selection process managed by the Metropolitan Planning Organization. The figure below illustrates the funding allocation for the FFY 2025-2028 as provided by PennDOT.

CRP Funding Allocated	FFY 2025	FFY 2026	FFY 2027	FFY 2028	Total for FFY 2025-2026	Total for FFY 2025-2028
CRP (General)	\$572,000	\$593,000	\$593,000	\$593,000	\$1,165,000	\$2,351,000
CRPU (Urban)	\$1,594,000	\$1,626,000	\$1,626,000	\$1,626,000	\$3,220,000	\$6,472,000
Total	\$2,166,000	\$2,219,000	\$2,219,000	\$2,219,000	\$4,385,000	\$8,823,000

Eligible Sponsors – Carbon Reduction Program (CRP)

Projects funded through the Carbon Reduction Program are locally administered, federal-aid transportation projects. Eligible sponsors are responsible for all aspects of project delivery—including development, quality assurance, contract administration, daily management, construction oversight, and record retention—even if these tasks are outsourced.

Per federal and PennDOT guidelines, the following entities are eligible:

1. Local Governments – Cities, boroughs, townships, and counties.
2. Regional Transportation Authorities – Including Metropolitan Planning Organizations (MPOs; e.g. LVPC).
3. Transit Agencies – Public transportation providers eligible under FTA guidelines (e.g., LANTA).
4. Tribal Governments – Federally recognized tribes.
5. Other Governmental Entities – Local or regional entities with transportation or trail oversight, such as park commissions or trail authorities.

All project sponsors were vetted by the LVPC MPO staff for adherence to these federal requirements.

LVPC Priority Climate Action (PCAP) Plan Goals

LVPC/LVTS Lehigh Valley Priority Climate Action Plan for Transportation Decarbonization (PCAP) focuses on strategies to reduce improve air quality from one of the region's primary sources – the transportation sector.

The Lehigh Valley PCAP incorporates input from planning partners, as well as decades of experience managing the Congestion Mitigation Air Quality (CMAQ) and Transportation Alternatives Set Aside (TASA) funding programs to recommend a menu of transportation strategies that can effectively reduce transportation emissions, support economic development and improve public health. The PCAP identifies near and long-term approaches for achieving these goals through improvements to the region's transportation network. The PCAP supports the goals of the federal CRP.

Additionally, the *Walk/RollLV: Active Transportation Plan* reinforces the need for a safe, comfortable, and connected active transportation network. It highlights infrastructure improvements such as high-visibility crosswalks, pedestrian refuge islands, accessible curb ramps, and traffic calming measures as essential to creating safe conditions for people walking, biking, and rolling.

Together, with the overarching goals of *FutureLV: The Regional Plan* these strategies inform the LVPC's carbon reduction approach, which is rooted in enhancing safety, connectivity, and accessibility for all users, across all modes of transportation throughout the region.

Project Selection Process:

Overall Objectives

The federal Carbon Reduction Program (CRP) outlines a broad range of eligible projects aimed at reducing transportation-related emissions. At a minimum, projects must meet the eligibility criteria outlined in Federal Highway Administration guidance. Additional criteria, including alignment with *FutureLV: The Regional Plan*, *Lehigh Valley Priority Climate Action Plan for Transportation Decarbonization*, and *Walk/RollLV: Active Transportation Plan*, as well as project readiness were determined by the LVTS Technical Committee as priority factors for selection.

State Climate Resilient Strategies (CRS)

The Pennsylvania CRS encourages LVPC to develop a transparent framework for identifying projects that utilize CRP funds. This framework could mirror the approach used to allocate funding for programs such as the Congestion Mitigation and Air Quality (CMAQ) program or other federal transportation initiatives where LVPC has local programming authority. The purpose of this framework is to ensure transparency in how CRP funds are prioritized and to demonstrate how selected projects align with broader federal goals to reduce emissions, promote fairness, and improve safety.

LVTS Project Selection Strategies

The list of projects was identified as eligible for Carbon Reduction Program (CRP) funding through a project selection process created by LVTS Technical Committee. To organize the projects for presentation, each project was vetted for consistency with several criteria indicated based on state and federal criteria. A more specific step-by-step outline of how the individual

projects were ranked and evaluated can be found in the Eligibility Criteria & Weight section of this document. An LVTS Technical Committee workshop on June 25, 2025, set the groundwork for CRP funding allocation, by reviewing the criteria and setting up the scoring to each criterion to determine a priority list of projects. This included consultation by LVPC staff with the sponsors of projects in *FutureLV*, and evaluation of regional criteria such as project delivery, readiness, and project cost. As an outreach strategy, LVPC staff emailed a survey on May 27, 2025, to project sponsors, with a follow up reminder on June 3rd, to assess project readiness.

The LVTS Technical Committee held a publicly advertised and accessible workshop on June 25, 2025. LVTS Technical Committee members included: Brendan Cotter, Becky Bradley, David Petrik, Basel Yandem, Jennifer Ruth and Nick Raio.

Eligibility Criteria & Weight

The initial list of CRP-eligible projects was limited to those within *FutureLV: The Regional Plan*, which serves as the Metropolitan Transportation Plan (MTP), developed and adopted per federal statute. Projects included in the MTP were identified through a vigorous plan review process that began with an open Call for Projects in 2019. It was followed by a project list update through a Transportation Needs Assessment in 2023. These public open calls for projects allowed for transportation systems need to be sourced across the region and matched with data and quantitative analysis to assess eligibility for federal and state funds by program. Any project determined eligible for state or federal transportation funds, thorough the open call was considered for CRP funding. The current list of CRP-eligible projects is limited to those in the adopted MTP, *FutureLV: The Regional Plan*. Projects were then identified for specific conditions and selected as consistent with 23 U.S.C. 134 of the Federal Code of Regulations. Projects were further scrutinized for consistency with the Pennsylvania Department of Transportation (PennDOT) Pennsylvania Carbon Reduction Strategy, November 2023 and Carbon Reduction Program (CRP) Eligibility Examples: 2025 guidance. Projects that met this criterion were considered eligible for further evaluation.

LVTS, in coordination with LVPC, has established formal project eligibility and evaluation criteria for Carbon Reduction Program (CRP) funding. These criteria are grounded in federal, state, and regional policy and are designed to ensure transparent, objective, and results-driven project selection.

Eligibility Criteria Framework

A total of sixteen (16) criteria has been identified, from the federal and state guidance, and regional priorities. These align with federal and state programmatic goals and address regional priorities specific to LVTS, particularly around implementation and fiscal responsibility and shovel readiness.

The Technical Committee was responsible for determining the weighting. After extensive discussion regarding the weighting of the criteria, the Technical Committee determined that LVTS criteria should be worth 40% of the scoring, whereas the other 12 criteria should split the remaining 60%. Ultimately, the committee decided to give both “shovel ready” and “project delivery” 15% each, and “project value” and “leveraging other funds” were given 5% each, for the total of 40% for LVTS. It was suggested that the remaining 12 criteria could be primarily based on carbon reductions. A discussion was held regarding the goals of the 2024 PCAP and the carbon emission reduction estimate to continue ranking and distributing percentages.

An estimate of carbon reduction from goals of the 2024 PCAP was used to create the rankings. The distributions were created to ensure they add up to 60, as follows:

Rank 1 (3 criteria) = 7 points each (21 total)

- “A project described to establish or operate a traffic monitoring, management, and control facility or program, including advanced truck stop electrification systems”
- “Efforts to reduce the environmental and community impacts of freight movement”
- “Projects to Support Alternative Fuel Vehicles, including the acquisition, installation, or operation of publicly accessible electric vehicle charging infrastructure or hydrogen, natural gas, or propane vehicle infrastructure, and the purchase or lease of zero-emission construction equipment and vehicles, including the acquisition, construction, or leasing of required supporting facilities”

Rank 2 (5 criteria) = 6 points each (30 total)

- “A project for advanced transportation and a congestion management technology”
- “A project for the deployment of infrastructure-based intelligent transportation systems capital improvements and the installation of vehicle-to-infrastructure communications equipment, including retrofitting dedicated short-range communications technology deployed as part of an existing pilot program to cellular vehicle-to-everything technology”
- “A project to replace street lighting and traffic control devices with energy-efficient alternatives”
- “A project or strategy designed to support congestion pricing, shifting transportation demand to non-peak hours or other transportation modes, increasing vehicle occupancy rates or otherwise reducing demand for roads, including electronic toll collection, and travel demand management strategies and programs”
- “Certain types of projects to improve traffic flow that are eligible under the CMAQ program, and that do not involve construction of new capacity”

Rank 3 (1 criterium) = 4 points each (4 total)

- “Other (Carbon sequestration, using local material, using renewable energy generation facilities, utilizing micromobility & electric alternative vehicle projects)”

Rank 4 (2 criteria) = 2 points each (4 total)

- “A public transportation project (construction of lanes, shelters, or lot facilities, or within .25 mile of a LANTA fixed route)”
- “Public Transportation Project within/along an EBS corridor”

Rank 5 (1 criterium) = 1 point (1 total)

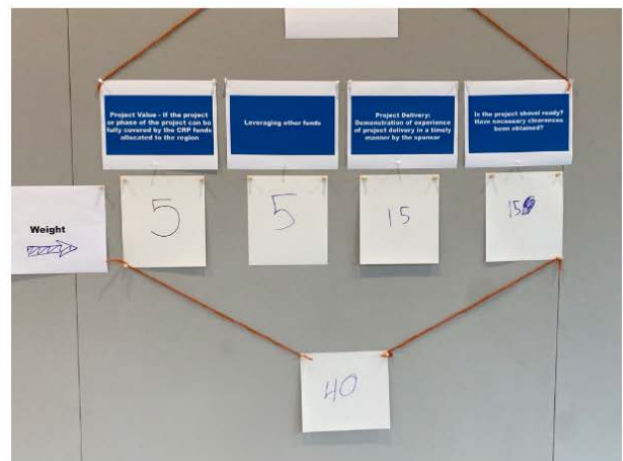
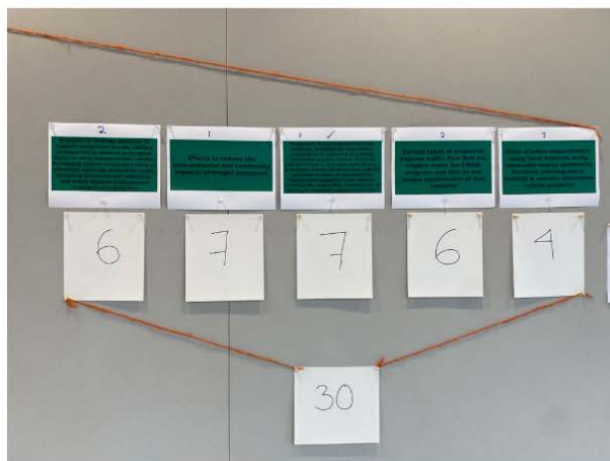
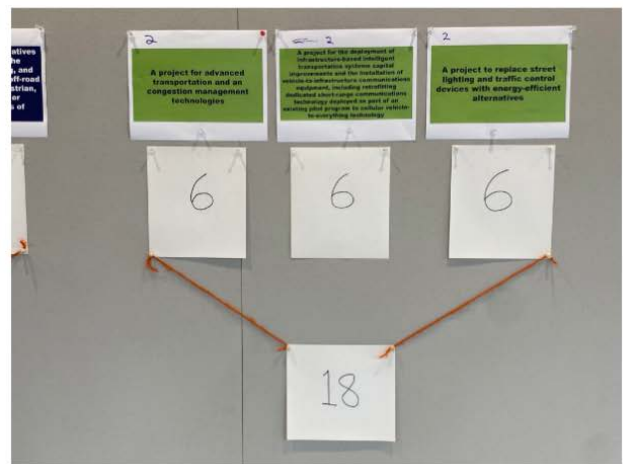
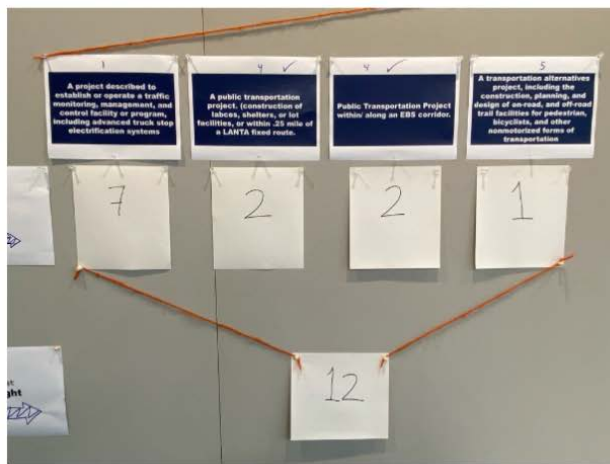
- “A transportation alternatives project, including the construction, planning, and design of on-road, and off-road trail facilities for pedestrian, bicyclists, and other motorized forms of transportation”

Federal Criteria Total = 60 points

LVTS ‘Project Readiness Criteria = 40 points

Total Points = 100

Here, rankings reflect the anticipated carbon emission reduction potential, where rank 1 is the most effective while rank 5 is the least effective. An image of the criteria wall (before/after) on how those criteria have been scored, and points are allocated are shown below.



List of Selected Eligible Projects

LVTB Carbon Reduction Funding Project Selection Process

LVPC staff created a list of the eligible projects based on the federal, state and regional criteria and a ranking was created once the LVTS Technical Committee decided on weighting. The committee reviewed each project from the highest scores down to allocate funding for FFY 25-28.

Projects that made it through this rigorous and competitive workshop and outreach process were presented to the LVTS Coordinating Committee for final selection on July 16, 2025. The selected project list for the CRP funding allocation is:

Sources:

- 1 - USDOT Federal Highway Administration (FHWA), “Carbon Reduction Program (CRP) Implementation Guidance” (Memorandum), April 21, 2022, [INFORMATION: Carbon Reduction Program \(CRP\) Implementation Guidance](#) (accessed July 3, 2025)
- 2 – Lehigh Valley Priority Climate Action Plan, February 2024, [content.lvpc.org/Publications/2024 Priority Climate Action.pdf](https://content.lvpc.org/Publications/2024%20Priority%20Climate%20Action.pdf) (accessed July 3, 2025)

Carbon Reduction Program (CRP) Funding						
Project Name	Project Description	CRP Funding Recommended by LVTS Technical Committee for Federal Fiscal Year (FFY) 2025	CRP Funding Recommended by LVTS Technical Committee for Federal Fiscal Year (FFY) 2026	CRP Funding Recommended by LVTS Technical Committee for Federal Fiscal Year (FFY) 2027	CRP Funding Recommended by LVTS Technical Committee for Federal Fiscal Year (FFY) 2028	Project Sponsor
Linden Street Conversion Project	This project involves the conversion of Linden Street to improve circulation and congestion by converting Linden Street from a one way southbound street to a two way street in the City of Bethlehem, Northampton County. Linden Street is currently a one way southbound street from Fairview Street to East Church Street. There is no parallel one way northbound street.	\$1,800,000				City of Bethlehem
Bus Rapid Transit (BRT) Bus Rider Infrastructure Safety Improvements	Infrastructure improvements along BRT routes involving crosswalks and bus rider amenities, queue jumps for traffic signalization and other infrastructure to enhance the BRT	\$366,000				LVTS
Main Street (State Route 412) and Polk Valley Road (State Route 2002) Improvements	Construct new sidewalk to connect to Saucon Rail Trail and installation of a new traffic signal		\$600,000			Hellertown Borough
Martin Luther King, Jr. Drive Pedestrian Improvements	Improve multimodal transportation infrastructure along the corridor, including Americans with Disabilities Act ramps, traffic control devices and crosswalks		\$300,000			City of Allentown
Bus Rapid Transit (BRT) Bus Rider Infrastructure Safety Improvements	Infrastructure improvements along BRT routes involving crosswalks and bus rider amenities, queue jumps for traffic signalization and other infrastructure to enhance the BRT		\$319,000			LVTS
Allentown LED Streetlight Conversion	Upgrade all pedestrian lighting infrastructure to high-efficiency LED technology across the city		\$500,000			City of Allentown
Traffic-Calming and Pedestrian Accommodation Improvements	Install traffic-calming and pedestrian improvement measures along Northampton Street from 7th Street to 15th Street and along 13th Street from Butler Street to Jackson Street		\$500,000			City of Easton
Broad Street Multimodal Project	Construct improvements along Broad Street from Hanover Avenue to Stefko Boulevard as recommended in the Broad Street Active Transportation Plan of 2021			\$1,400,000		LVTS & City of Bethlehem
Bus Rapid Transit (BRT) Bus Rider Infrastructure Safety Improvements	Infrastructure improvements along BRT routes involving crosswalks and bus rider amenities, queue jumps for traffic signalization and other infrastructure to enhance the BRT			\$300,000		LVTS
Allentown LED Streetlight Conversion	Upgrade all pedestrian lighting infrastructure to high-efficiency LED technology across the city			\$219,000		City of Allentown
Traffic-Calming and Pedestrian Accommodation Improvements	Install traffic-calming and pedestrian improvement measures along Northampton Street from 7th Street to 15th Street and along 13th Street from Butler Street to Jackson Street			\$300,000		City of Easton
Riverside Drive RAISE Grant	The project will convert approximately 2 miles of an abandoned railroad bed along the west side of the Lehigh River in Whitehall Township and the City of Allentown, Lehigh County, from Lehigh Avenue to Furnace Street to a complete two-lane street with an adjacent multi-use path. The multi-use path will continue north to connect to the existing Delaware and Lehigh (D&L) Trail just north of Race Street. The project will also convert another 450 feet of an abandoned railroad bed between Hamilton Street and Union Street within the City of Allentown to complete the southern terminus of Riverside Drive. Proposed Riverside Drive will vary in width from 24 feet to 36 feet, providing one lane in each direction (north/south) and allowing for turn lanes where warranted. The proposed speed limit will be 25 MPH. The multi-use path will be 10 feet wide and located between Riverside Drive and the Lehigh River. The Right-of-Way will be variable in width, with most of the required Right-of-Way falling within the boundaries of the former RJ Corman Railroad parcels, which will be donated to the City of Allentown, Whitehall Township, and Lehigh County by a private entity. The new roadway will be owned by the City of Allentown and Whitehall Township within their respective municipal boundaries, while the multi-use path will be owned by Lehigh County within Whitehall Township and by the City of Allentown within its limits. The area type is urban. The project includes \$19.34 million matching funds provided as a real property donation.				\$1,800,000	LVTS
Bus Rapid Transit (BRT) Bus Rider Infrastructure Safety Improvements	Infrastructure improvements along BRT routes involving crosswalks and bus rider amenities, queue jumps for traffic signalization and other infrastructure to enhance the BRT				\$219,000	LVTS
Traffic-Calming and Pedestrian Accommodation Improvements	Install traffic-calming and pedestrian improvement measures along Northampton Street from 7th Street to 15th Street and along 13th Street from Butler Street to Jackson Street				\$200,000	City of Easton
Total Funding Recommended		\$2,166,000	\$2,219,000	\$2,219,000	\$2,219,000	