

Appendix G
SHPO Consultation



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

July 27, 2022

Matthew Hamel
AECOM
125 Broad Street
Suite 1500
New York PA 100040000

RE: ER Project # 2022PR03336.001, Lehigh Valley International Airport Air Cargo Facility,
Federal Aviation Administration, Hanover Township, Lehigh County

Dear Matthew Hamel:

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Above Ground Resources

No Above Ground Concerns - Environmental Review - No Historic Properties - Above Ground

Based on the information received and available in our files, it is our opinion that there are no above ground historic properties (resources listed in or eligible for listing in the National Register) present in the project area of potential effect. Therefore, no above ground historic properties will be affected by the proposed project. Should the scope of the project change and/or new information be brought to your attention regarding historic properties located within the project area of potential effect, please reinitiate consultation with our office using PA-SHARE.

For questions concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov.

Archaeological Resources

No Archaeological Concerns - Environmental Review - No Historic Properties - Archaeological

Based on the information received and available within our files, it is our opinion that there are no archaeological historic properties (resources listed in or eligible for listing in the

National Register) present within the area of potential effect. Should the scope of the project change and/or should you be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning archaeological resources, please contact Emma Diehl at emdiehl@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Emma Diehl".

Emma Diehl
Environmental Review Division Manager



AECOM
1700 Market Street
Suite 1600
Philadelphia, PA 19103
aecom.com

Project name:
Lehigh Valley International Airport
Air Cargo Facility

Project ref:

From:
Matt Hamel, Architectural Historian

Date:
July 21, 2022

To:

Heather Davis-Jenkins, CFM
Federal Aviation Administration
Environmental Protection Specialist
Harrisburg Airports District Office
3905 Hartzdale, Dr. Ste 508
Camp Hill, PA 17011

and

Andrea MacDonald, Director
Pennsylvania State Historic Preservation Office
Pennsylvania Historical & Museum Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

CC:

Ryan Meyer, LNAA
Bryan Oscarson, AECOM

Memo

Subject: Section 106 Project Initiation

The Lehigh-Northampton Airport Authority (LNAA) is proposing the construction of a project located at the Lehigh Valley International Airport (ABE) in Hanover Township, Lehigh County (**Figure 1**). The project comprises a new air cargo facility (Project) to be located on airport property. Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) "Protection of Historic Properties" (Section 106), AECOM has prepared this memo to assist the Federal Aviation Administration (FAA) with the initiation of the Section 106 consultation process for the project and to seek concurrence from the Pennsylvania State Historic Preservation Office (PA SHPO) with FAA's recommendation.

Description of Undertaking

The proposed project consists of the following elements, as depicted on the attached Project Sketch Plan (**Figure 2**):

Cargo Building. Construction of a single-story warehouse type building (approximately 100,000-sf), for the processing of cargo from the airside to the landside. The building would include space for offices, employee support, storage areas, and ground service equipment (GSE) maintenance. The landside of the proposed building would include loading docks and adequate space for truck movement.

Aircraft Parking Apron. Construction of an apron on the airside of the proposed building, including a taxilane, hardstands, and parking for four aircraft (up to B767-F), as well as space for ground handling operations (aircraft loading and unloading, circulation and storage of GSEs, unit load devices (ULDs) and pallet storage).

Access Road. Extension of Willowbrook Road from the intersection with Race Street (State Route 1004) into the project site. Limited road work at the intersection would include minor modifications to accommodate truck turning movements. No other improvements or changes are proposed based on the traffic study submitted to PennDOT.

Employee Parking and Truck Parking/Staging Area. Construction of separate paved surface lots for employee parking and truck storage and staging. The size of each lot will be determined by the tenant during the design process.

Fuel Storage Facility. Construction of a supplemental fuel facility to provide aviation fuel for tenant aircraft operations. The facility would be sized to accommodate up to four tanks for storing Jet-A fuel (for turbine-jet aircraft) and AvGas (aviation gasoline for small piston powered aircraft). Landside access to the facility for supplier deliveries would be through the security fence/gate connected to Willowbrook Road. Airside access for on-airport fuel trucks would be from an airport vehicle service road.

The proposed location of as-needed site development work to accommodate the project will be determined during schematic design and will include:

- ground clearing, grading, drainage, and stormwater management
- installation and connection of utility services (electricity, potable water, natural gas, sanitary sewer, and communications)
- security lighting, fencing and gates
- airfield pavement lighting
- relocating vehicle service roads, as needed to accommodate the project

Onsite work at ABE to facilitate the project is already depicted on the attached 2020 Airport Layout Plan (ALP) Update (**Figure 3**) and consists of:

- Taxiway C/Aircraft Parking Modifications
- Construction of Parallel Taxiway D

Area of Potential Effects

The Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The proposed above ground APE is limited to the area immediately surrounding the location of the proposed undertaking and consists of mostly open space within the airport property reserved for aeronautical development (**Figure 4, Photos 1-8**). The APE also extends to the north along the proposed alignment of the Willowbrook Road extension (**Photos 9-12**). The proposed APE for archaeology is within the boundary shown in Figure 4 and encompasses the limits of disturbance for new footings and utility trenching related to the new structure, as well as the limits of disturbance for the proposed access modifications, aircraft parking apron, employee and truck parking, fuel storage facility, temporary staging, and grading and drainage related to stormwater management.

Identification of Historic Properties

The Lehigh Valley International Airport (originally the Allentown-Bethlehem-Easton Airport) was previously determined to be ineligible for the National Register of Historic Places (NRHP) on December 19, 2014, in conjunction with previous improvements (PA-SHARE Project # 2002PR17230). Three properties abutting the proposed extension of Willowbrook Road were also included in the previous historic structures survey and determined to be ineligible for the NRHP, as summarized in **Table 1** below and shown in the attached photos (**Figure 5, Photos 13-16**). An additional property, 1585 E. Race Street was demolished to facilitate the realignment of the Race Street/Willowbrook Road intersection. All properties are currently owned by the LNAA.

Table 1. Previously Identified Historic Architectural Resources

ID Number	Name/Address	NRHP Status
2014RE00594	Allentown-Bethlehem-Easton Airport	Not Eligible
2014RE00426	1579 East Race St.	Not Eligible
2014RE00775	120 Willowbrook Rd.	Not Eligible
2014RE00777	Fassman Property/111 Willowbrook Rd.	Not Eligible

AECOM Architectural Historian Courtney Clark conducted a survey of the project site on July 7, 2022. Ms. Clark surveyed, photographed, and noted the site’s built environment. Ms. Clark meets the Secretary of the Interior (SOI) Professional Qualifications Standards (36 CFR Part 61) in Architectural History. AECOM did not identify any additional historic architectural resources within the APE.

On July 12, 2022, SOI-qualified (36 CFR 61) AECOM Archaeologist Andrew Wyatt examined the Pennsylvania Historic & Archaeological Resource Exchange (PA-SHARE) database for areas of previously documented archaeological sensitivity and/or archaeological sites near the project location. The PA-SHARE review indicated that no known archaeological sites are mapped within or adjacent to the Air Cargo Facility project. The State-Wide Pre-Contact Probability Model, maintained by the PA SHPO and also on PA-SHARE, ranks the project footprint and limits of disturbance as having a low to moderate probability of containing an unrecorded Native American archaeological site.

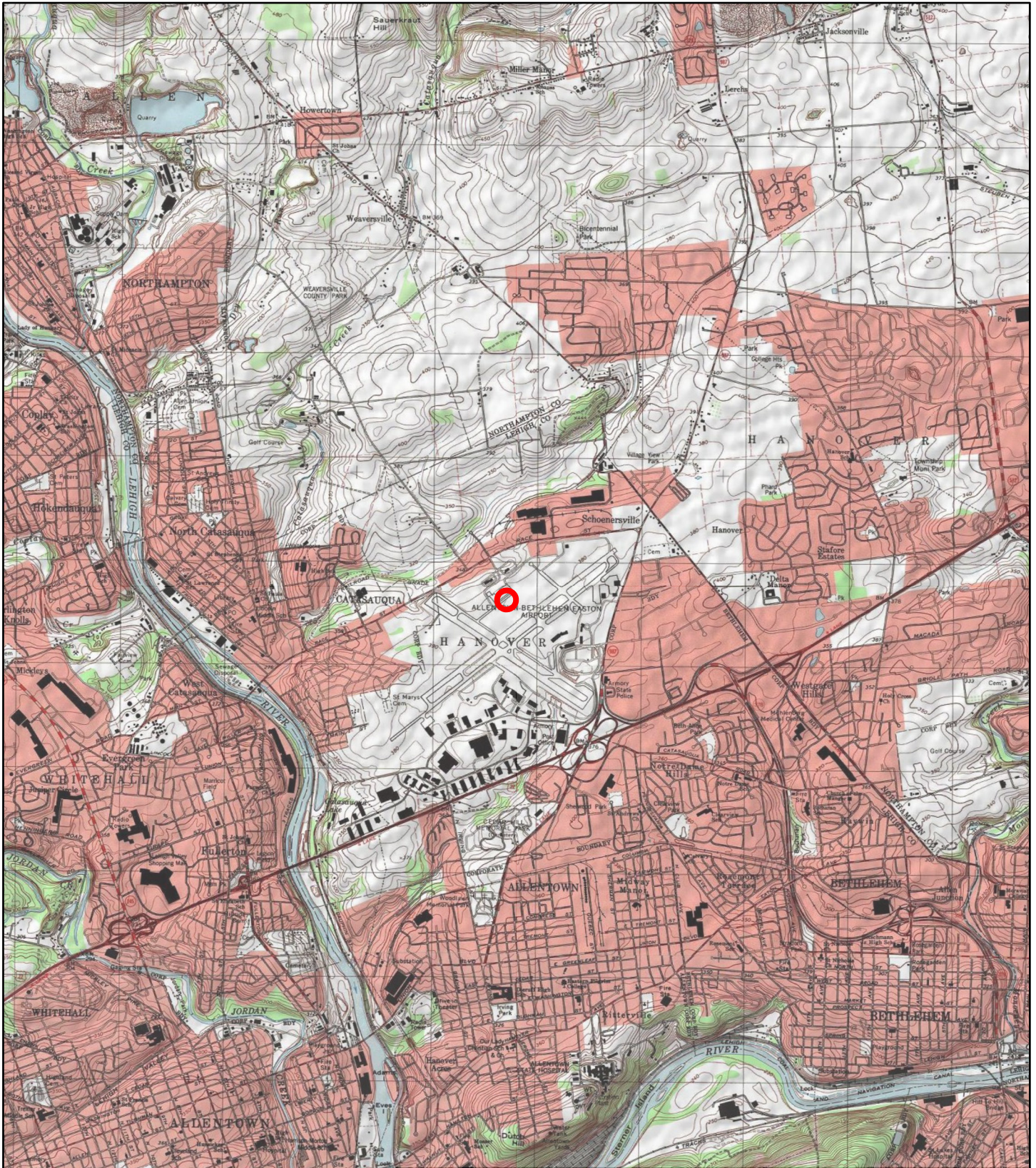
The nearest and potentially most relevant archaeological survey (PA-SHARE Report # 20021018042JJ_6) was conducted parallel to and west of Runway 13-31 in advance of planned safety improvements. That area had been graded flat at some point prior to the archaeological survey. It is likely that the project footprint for the proposed undertaking was graded during one or more runway construction projects in order to provide unobstructed views. It is therefore AECOM’s opinion that the project has a very low potential to contain archaeological sites, including areas of temporary staging, and grading/drainage for stormwater management.

Assessment of Effects

Based on the comprehensive documentation of above-ground resources greater than 50 years of age by a 2014 historic resource survey, including those within the APE which were previously found to be ineligible for the NRHP, as well as the low potential for archaeological sites within the APE, AECOM recommends that the Project will have No Effect on Historic Properties in accordance with 36 CFR Part 800.4(d)(1).

If you have questions or wish to discuss this project, please do not hesitate to contact me at 1-610-234-0440 or via e-mail at matthew.hamel@aecom.com.

Attachment A - Figures



AECOM

**Air Cargo Facility Project
Lehigh Valley International Airport
Hanover Township, Allentown, PA**


AECOM
1700 Market Street
Suite 1600
Philadelphia, PA, 19103 USA

Figure 1

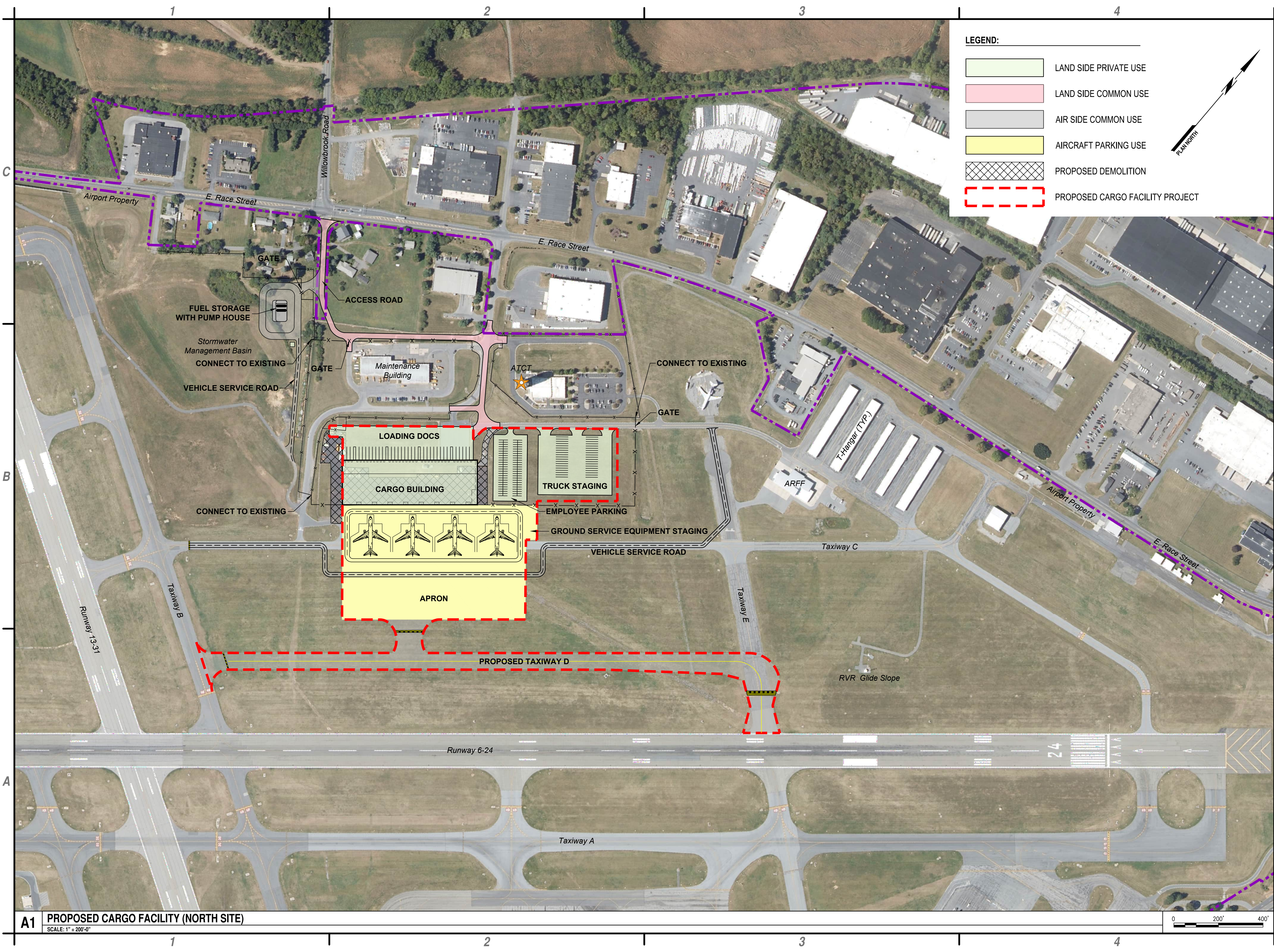
 Site Location



0 2,000 4,000
Feet



Jul 21, 2022 - 9:58pm
 C:\Users\jgregory\OneDrive - AECOM\Desktop\A1\North Cargo\Proposed Cargo Facility - North Site - v2.dwg



LEGEND:

- LAND SIDE PRIVATE USE
- LAND SIDE COMMON USE
- AIR SIDE COMMON USE
- AIRCRAFT PARKING USE
- PROPOSED DEMOLITION
- PROPOSED CARGO FACILITY PROJECT



PRELIMINARY
 NOT FOR
 CONSTRUCTION

**CARGO BUILDING
 DEVELOPMENT PROJECT**
 LEHIGH VALLEY INTERNATIONAL AIRPORT
 ALLENTOWN, PA.
 HANOVER TOWNSHIP

MARK	DATE	DESCRIPTION
REVISIONS		
PROJECT NO:		
DATE: JULY 21, 2022		
DRAWN BY:		
DESIGNED BY:		
CHECKED BY:		

**PROJECT
 SKETCH PLAN
 DRAFT**

Figure 2

A1 PROPOSED CARGO FACILITY (NORTH SITE)
 SCALE: 1" = 200'-0"





Figure 4

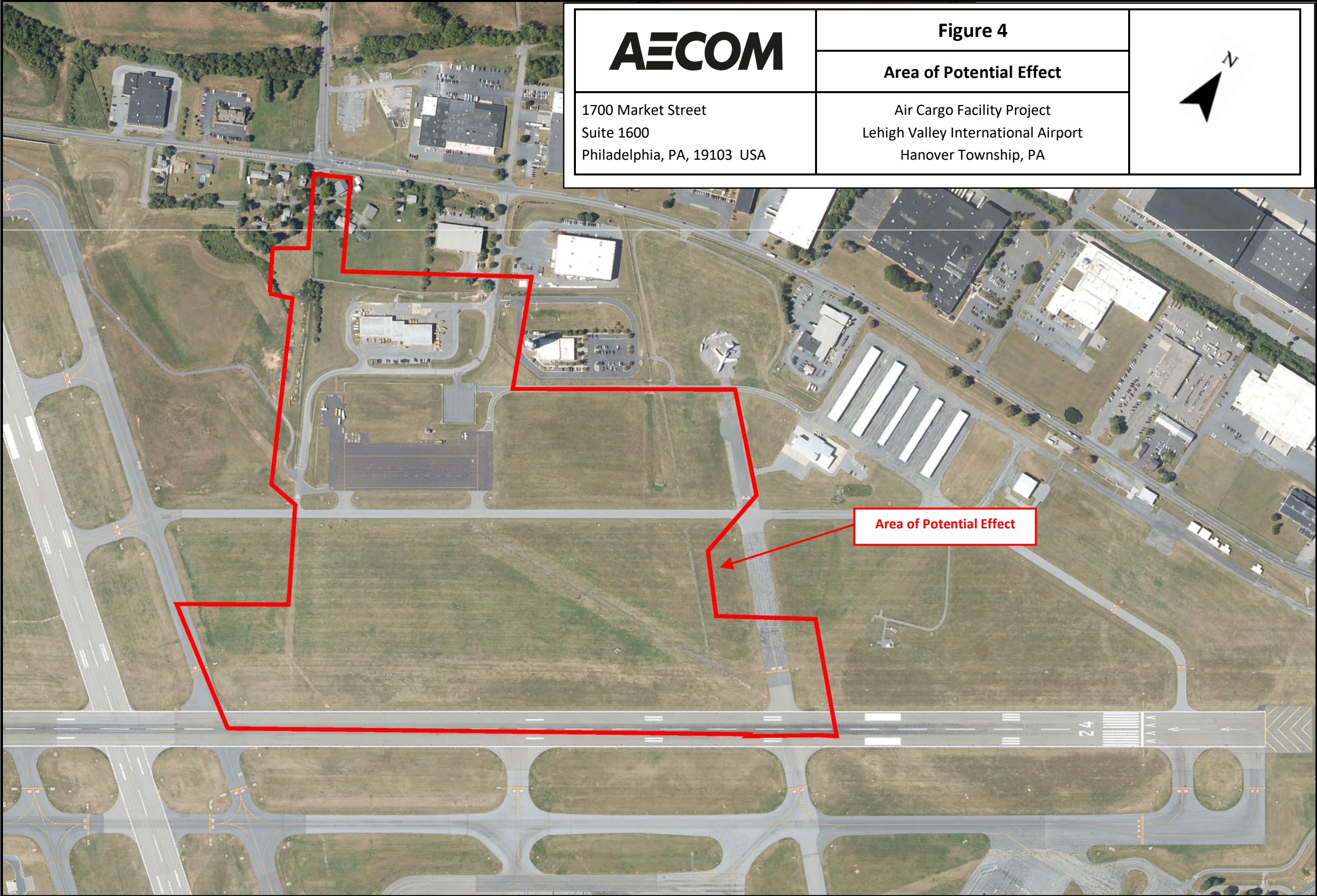
Area of Potential Effect

1700 Market Street
Suite 1600
Philadelphia, PA, 19103 USA

Air Cargo Facility Project
Lehigh Valley International Airport
Hanover Township, PA



Area of Potential Effect





Previously Surveyed Resource



Figure 5
Location of Previously Surveyed Resources

Air Cargo Facility Project
Lehigh Valley International Airport
Hanover Township, PA



Attachment B - Photographs

PHOTOGRAPHS

Photo No. 1	Date: 7/7/2022	
Direction Photo Taken: Northeast		
Description: View of airport property from approximate site of proposed Air Cargo Facility employee parking/truck staging lot.		

Photo No. 2	Date: 7/7/2022	
Direction Photo Taken: East		
Description: View of airport property from approximate site of proposed Air Cargo Facility. ABE Terminal in distance at right.		

PHOTOGRAPHS

Photo No. 3	Date: 7/7/2022	
Direction Photo Taken: Southwest		
Description: View of airport property from approximate site of proposed Air Cargo Facility.		

Photo No. 4	Date: 7/7/2022	
Direction Photo Taken: Northwest		
Description: View of airport property from approximate site of proposed Air Cargo Facility. Airport maintenance structure at center.		

PHOTOGRAPHS

Photo No. 5	Date: 7/7/2022	
Direction Photo Taken: Northwest		
Description: View of maintenance building.		

Photo No. 6	Date: 7/7/2022	
Direction Photo Taken: North		
Description: View of control tower.		

PHOTOGRAPHS

Photo No. 7	Date: 7/7/2022	
Direction Photo Taken: Northeast		
Description: View of Aircraft Rescue and Fire Fighting training facility.		

Photo No. 8	Date: 7/7/2022	
Direction Photo Taken: Southeast		
Description: View of terminal from approximate location of proposed Air Cargo Facility.		

PHOTOGRAPHS

Photo No. 9	Date: 7/7/2022	
Direction Photo Taken: Northwest		
Description: View of Fassman Property/111 Willowbrook Rd. (2014RE00777) from rear of maintenance building. Property was previously determined to be ineligible for the NRHP. New connector road beyond fence will link the extension of Willowbrook Rd. (west/left) with Fashion Dr. (east/right).		

Photo No. 10	Date: 7/7/2022	
Direction Photo Taken: Northeast		
Description: View of approximate alignment of Willowbrook Rd. and Fashion Dr. connector, which will extend to the northeast on opposite side of existing fence.		

PHOTOGRAPHS

Photo No. 11	Date: 7/7/2022	
Direction Photo Taken: Southwest		
Description: View of approximate alignment of Willowbrook Rd. and Fashion Dr. connector, which will extend to the southwest on opposite side of existing fence.		

Photo No. 12	Date: 7/7/2022	
Direction Photo Taken: Southeast		
Description: View from intersection of Willowbrook Rd. and Fashion Dr. connector toward location of proposed cargo hanger. Road will be widened to the north/left.		

PHOTOGRAPHS

Photo No. 13	Date: 7/7/2022
Direction Photo Taken: Southeast	
Description: View of alignment of Willowbrook Rd. extension to location of proposed cargo facility from intersection with Race St.	



Photo No. 14	Date: 7/7/2022
Direction Photo Taken: South	
Description: View of 120 Willowbrook Rd (PA SHARE ID 2014RE00775) which abuts the proposed access road. Property was previously determined to be ineligible for the NRHP.	



PHOTOGRAPHS

Photo No. 15	Date: 7/7/2022
Direction Photo Taken: Southeast	
Description: Primary elevation of 120 Willowbrook Rd. (PA SHARE ID 2014RE00775) from approximate alignment of proposed access road. Property was previously determined to be ineligible for the NRHP.	



Photo No. 16	Date: 7/7/2022
Direction Photo Taken: Southeast	
Description: View of 1579 Race St. (PA SHARE ID 2014RE00426) which abuts the proposed access road at the southwest quadrant of the intersection with Race St. Property was previously determined to be ineligible for the NRHP.	

