

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, September 21st at 12:00 noon
AGENDA

**THE MEETING CAN BE ACCESSED AT <http://tiny.cc/CP2021mtgs> OR VIA PHONE
610-477-5793 Conf ID: 143 361 716#**

Roll Call

Ordinance/Plan Reviews and Information for September 2021:

County Planning Review as Municipal Planners

1. *INFORMATION ITEM:* PennStro Leasing – Glendon Borough (BB, JS)

County Planning Review as County Planners (FutureLV)

1. *ACTION ITEM:* Moore Township – Land Use of Regional Significance – Southmoore Business Center (BB)
2. *ACTION ITEM:* Emmaus Borough – Land Use of Regional Significance – Seven Generations Charter School Building Addition (JS)
3. *ACTION ITEM:* Coopersburg Borough and Upper Saucon Township – Land Use of Regional Significance – Liberty Bell Elementary School (JS)
4. *ACTION ITEM:* Hanover Township (LC) – Land Use of Regional Significance – Air Products and Chemicals, Inc. Hangar (PC/BS)
5. *ACTION ITEM:* North Whitehall Township – Subdivision and Land Development Ordinance Amendment – Submission and Property Owner Notification (JB)
6. *ACTION ITEM:* South Whitehall Township – Zoning Ordinance Amendment – No-Impact and Low-Impact Home-Based Businesses (JS)
7. *ACTION ITEM:* Allen Township – Zoning Ordinance and Subdivision and Land Development Ordinance Amendments – Mixed-Use Village in the R1 District (JS)

Other Business

Engagement and Participation (MA)

1. *INFORMATION ITEM:* Morning Call Business Cycle Column (MA)
2. *INFORMATION ITEM:* Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1! (MA)
3. *INFORMATION ITEMS:* Engagement and Participation (MA)
 - a. Lehigh Valley Gala + Awards (MA)
 - b. Local Technical Assistance Programs

- i. Analyzing Crash Data at Intersections, Oct. 14, 11 am to noon
- ii. Asphalt Roads Common Maintenance Problems, Oct. 19, 8 am to noon.
- iii. Common Issues in Alleys, November 4, 11am To noon.
- c. Lehigh Valley Government Academy:
 - i. Zoning Administration
 - 1. October 13, 20 & 27 from 5:30 – 9:00 pm

Next Comprehensive Planning Committee Meeting:
October 26, 2021 at 12:00 pm

September 09, 2021

Mr. John Becker, Planning Commission Chair
Moore Township
2491 Community Drive
Bath, Pennsylvania 18014

**RE: Southmoore Business Center – Land Use of Regional Significance
Moore Township
Northampton County**

Dear Mr. Becker:

The Lehigh Valley Planning Commission (LVPC) will consider the subject 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 happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting
 - September 21, 2021 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - September 23, 2021 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Warehouse, Logistics and Storage Facilities category. The subject application proposes to construct two warehouses – one being 347,750 square feet and the other 140,000 square feet – at 235 Moorestown Drive. A consolidation of two lots is also proposed to facilitate the development (parcel numbers J6 10 2A and J6 10 2).

The proposal is inconsistent with *FutureLV: The Regional Plan* because the proposed location lacks the necessary criteria to support the long-term success of the project and fails to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).

The project site is proposed in an area designated for Farmland Preservation in the General Land Use Plan. While the site itself is not an agricultural use, the site is not served by public sewer or water utilities, and the scale of development proposed far surpasses that of surrounding developments. Locating a development of the proposed scale in this location will substantially alter the character of the area. Additionally, the site is located over 6 miles away from the nearest Route 22 interchange and over nine miles away from the nearest Route 33

interchange and would require truck routes to utilize sections of nearby roadways (Route 512, Route 248 and local roads) that were not built to withstand truck traffic. In addition, passenger, delivery and tractor trailer vehicles will need to travel through historic core communities, such as Bath and Nazareth Boroughs, that absolutely do not have the road widths, contain traffic signalization, pedestrian, cyclist, schools and other transportation conditions and uses that cannot withstand the frequency, intensity or congestion that large industrial uses so far away from the highway brings. In addition, inappropriately located development adds to the tax burden, as transportation system maintenance alone, will be transferred to citizens and businesses locally, countywide, statewide and even nationwide. By way of perspective, today there is a statewide highway and bridge funding need of \$8.15 billion to just maintain state-owner roads like Route 512. There is a statewide local transportation funding need of at least \$3.9 billion today, as well. Meaning basic maintenance of the transportation system is underfunded by tax revenues, jeopardizing mobility without adding a single other transportation-based business or users (Pennsylvania Transportation Revenue Options Commission Report, July 30, 2021). In a largely rural community, like Moore Township, that does not have the population or employment density to meet federal funding criteria for major transportation improvements, the community should proceed in development review and negotiations with extreme caution, especially with no defined-end users.

Additionally, without planned extension of public water or sewer this site cannot meet the needs of manufacturers. This essentially limits the use of the proposed buildings to warehousing, e-commerce, or other uses that typically have low-wage, low-skill, easily automated jobs and intensive transportation profiles.

All-in-all, the Commission doubts the proposal is economically viable in the location and poses a risk to the region's workforce, transportation system, quality of life and environment. Again, the proposal is not supported by the bi-county comprehensive plan and long-range transportation for the region, *FutureLV* and is the very definition of poor development.

The Commission also, understands that the Township has quickly worked to amend its land use regulations to mitigate future developments of this type, and that these new regulations are not applicable to this proposal. As noted in the LVPC's review of the freight ordinance last month we commend the Township for a quick and appropriate legislative response to these types of development. We also, encourage the Township to utilize the *regulatory tool* of the Township adopted *Nazareth Area...2030 Multimunicipal Comprehensive Plan*. The Land Use Plan section of your comprehensive plan outlines the need for sanitary sewers and community water systems associated with infill "light industrial" uses. Other areas of your comprehensive plan from transportation to the environment, also support the Townships *right to negotiate* with the developer in the interests of the public health, safety and general welfare. We encourage the Township not to simply rely on the subdivision and land development ordinance checklist alone when reviewing this proposal and instead utilize *all* the tools that the Pennsylvania Municipalities Planning Code provides, especially, your legally required and duly enacted multi-municipal comprehensive plan. As we understand that the Township must address this development within the confines of the municipal ordinances in place at the time of the land development application, we offer the following considerations to assist in the refinement of the preliminary plan:

Transit

The project is proposed in a rural location that does not have a sidewalk network, and the Lehigh and Northampton Transportation Authority (LANTA) does not provide transit service in the area. The lack of alternative transportation options reinforces dependency on personal automobiles and increases traffic. *FutureLV* recommends 'matching development intensity to sustainable infrastructure capacity' (of Policy 1.1) because roadway capacity can be optimized by providing a mix of transportation options (Policy 2.1).

Additionally, the availability of transit service plays a critical role in getting employees to and from work across the Lehigh Valley, as warehouse developments are increasingly being located outside of the region's core transportation network, and the region has seen a growing location-based mismatch between employment opportunities and housing affordable at those income levels. Data on the site plan anticipates 305 employees between the two proposed buildings during a peak shift, and the ability for those workers to access the site without barriers directly affects the marketability and occupancy associated with the development. This is just as much a workforce need as an operational requirement for the business occupying the site. If workers cannot get to the job, the business will struggle to operate and therefore, the marketability and tenancy potential of the industrial property declines. It is imperative to consider all economic implications this proposal poses to 'the infrastructure system, economy, tax base, environment and community' (of Policy 2.4).

If the project moves forward, the LVPC provides the following recommendations to improve the consistency of the proposal by mitigating adverse impacts to the Township and community while better supporting the long-term interests of the developer:

Traffic Impacts and Congestion

The LVPC reviewed a Transportation Impact Study (TIS) for the subject application. Based on the combined square footage of the two warehouse buildings proposed, the project is anticipated to generate an average of 849 vehicle trips per day, of which 293 would be trucks (*Institute of Transportation Engineers Trip Generation Manual, 10th Edition*).

The project site is located between two segments of Route 512 that are identified as congested corridors in the *MoveLV Congestion Management Process* – Bushkill Center Road to Fox Ridge Drive/Bushkill Terrace to the north (Bushkill Township), and Main Street to Jacksonville Road to the south (Bath Borough and East Allen Township). Traffic generated by the proposed development will exacerbate vehicular and truck traffic issues in these locations. The LVPC supports the continuation of long-term discussions between the Township, surrounding communities, Pennsylvania Department of Transportation and LVPC to 'assess the impact of freight-based businesses on the entire regional transportation system' (of Policy 2.4).

The LVPC commends the proposed left-turn lane with 150 feet of storage length and the southbound right turn lane with 355 feet of storage length, as these lanes will assist in queue mitigation at the new four-way intersection created by the proposed development.

However, the southbound left turn lane to Fairway Avenue has been removed and may cause issues as vehicles crest the hill and come to the intersection. The warrants for a traffic signal should also be studied by the developer to ‘enhance incident management strategies’ (of Policy 2.2). This is a highly traveled corridor (between two congested corridors) and turning movements at a stop-controlled intersection may be difficult for large trucks, especially those turning left out of the proposed development and going uphill on northbound Route 512.

Tractor-Trailer Access and Accommodations

The LVPC strongly recommends providing overnight tractor-trailer parking areas to ‘expand truck parking options and amenities’ (of Policy 2.4), eliminating their need to park on road shoulders and in residential areas. Truck parking stalls and layover spaces should be electrified to limit idling and reduce emissions, ensure compliance with the 2008 Pennsylvania Diesel Idling Law and support the overall improvement of air quality (of Policy 3.4). Additionally, driver amenities should be provided including a lounge, restrooms and food dispensing machines. Implementing these recommendations would keep truck drivers safe and minimize quality of life impacts the freight facility will have on residents (of Policy 2.4).

The accumulation of snow and ice on top of tractor-trailers poses a safety hazard to other vehicles on the roadway, potentially resulting in serious injury and death. The 2006 Pennsylvania Snow/Ice Removal Law requires the removal of snow and ice from all vehicles prior to leaving the site. A snow-clearing tool should be installed at the site to easily allow for truck drivers to clean off tractor-trailers and ‘provide a safe, well-maintained transportation network’ (Policy 2.2).

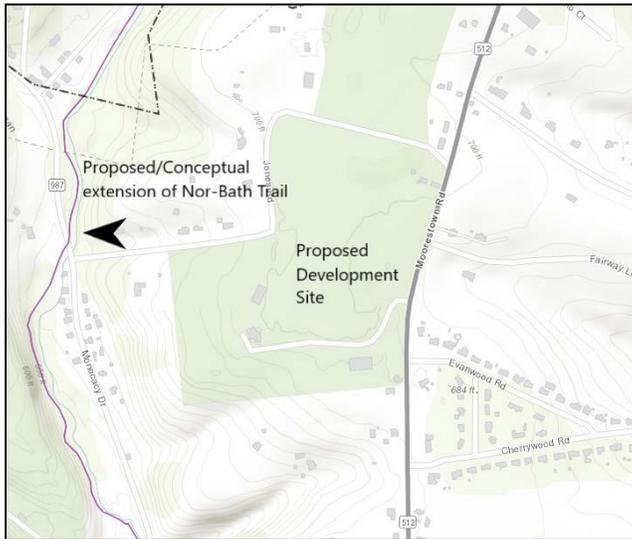
Multimodal Accessibility Improvements

While the vicinity in which this development is proposed does not have a pedestrian or multimodal network, a proposed/conceptual extension of the Nor-Bath Trail is located just west of the project site along the Monocacy Creek, and the possibility of future multimodal connections to the site are not out of the question. The LVPC recommends installing multimodal infrastructure components that ‘promote safe and secure community design’ (Policy 5.1) at the time of land development. If multimodal connectivity options were to extend to the site in the future, the site would already contain the internal infrastructure necessary to support safe pedestrian connections. The LVPC recommends incorporating pedestrian infrastructure along the access driveways and between the two

proposed buildings. Providing sidewalks along Jones Road can provide future connectivity to the trail extension. Including bicycle storage racks in a convenient location would also support integration of mixed transportation into public space design (of Policy 5.2).

In addition, the Commission recommends inclusion of a drop-off and pick-up location internal to the site. This includes a large, covered waiting area, with seating, like a bus shelter, trash receptacles, lighting, crosswalks and pavement markings that allow for safe access of employees to the facilities in the development. These types of drop-off and pick-up locations support individual, ride share (e.g., Uber, Lyft) and even future transit service in a coordinated manner. A good example of this type of worker safety and

transportation management facilities exist at the Amazon Fulfillment Facility at 1610 Van Buren Road, Easton



Landscaping and Sustainability

While the LVPC commends the comprehensive inclusion of natural landscaping along the site perimeter, areas of additional landscaping should be designed to provide health benefits and ‘improve access to green spaces’ (of Policy 5.3) for employees. In addition, enhanced landscaping throughout the site would better support the transition between the

development, nearby natural areas along the Monocacy Creek and the surrounding agricultural setting.

The proposal can be substantially improved by incorporating sustainable systems into the functionality and design of the facility. Sustainable utilities such as geothermal energy systems and greywater reuse for irrigation and plumbing reduce overhead operational costs while ‘minimizing environmental impacts of development’ (Policy 3.1). Incorporating sustainable practices also helps to ‘reduce climate change impacts’ (Policy 3.4) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.

Stormwater

The project site is located within the Monocacy Creek watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Note that the LVPC has received a time extension for the review of the project’s stormwater management plan, and comments related to the stormwater review will be provided in a separate letter.

The LVPC has copied appropriate representatives from the Nazareth Area Multi-Municipal Comprehensive Plan communities and adjacent municipalities to further ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4). The LVPC encourages continued conversations between the Township, nearby communities and project partners to ‘expand collaboration on planning and development’ (of Policy 4.6).

Municipalities, when considering subdivision/land developments, 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)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or municipal ordinance requirements since these items are covered in the Township's review.

Feel free to call or email me with any questions.

Sincerely,



Jillian Seitz
Senior Community Planner



Becky A. Bradley, AICP
Executive Director

cc: John Becker, Moore Township Planning Commission Chair; Nicholas Steiner, Moore Township Manager; Mark Saginario, Bath Borough Council President / Planning Commission Chair; Jason Kocsis, Chair, Bushkill Township Planning Commission; John Defassio, Chapman Borough Secretary; Barry Check, Chair, Hanover Township Planning Commission; John Finnigan, Hanover Township (NC) Manager; Lori Stauffer, Lower Nazareth Township Manager; Lori Seese, Lower Nazareth Township Planning Director; Barbara Fischl, Nazareth Borough Planning Commission; Sean Dooley, Stockertown Borough Planning Commission Chair; Robert Hayes, Tatamy Borough Council Chair; Lisa Klem, Upper Nazareth Township Manager; Geoff Reese, LVPC Director of Environmental Planning; Paul Carafides, LVPC Director of Transportation Planning and Data; Jack Muschlitz, Water's Edge at Wind Gap, LLC; Steve Walsh, PE, Project Engineer



GREG ZEBROWSKI
Chair

STEVEN GLICKMAN
Vice Chair

PAMELA PEARSON
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

August 2, 2021

Mr. Michael Gibson, Chair
Emmaus Borough Planning Commission
28 South Fourth Street
Emmaus, PA 18049

**RE: Seven Generations Charter School Building Addition –
Land Use of Regional Significance
Emmaus Borough
Lehigh County**

Dear Mr. Gibson:

The Lehigh Valley Planning Commission (LVPC) will consider the subject 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 happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting
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The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* as an educational facility. It proposes to construct a 4,345-square-foot addition to the existing building located at 33 East Minor Street (parcel number 549487016062). This proposal generally exhibits consistency with *FutureLV* because it is located in the Development area of the General Land Use Plan, enhances the long-term viability of assets (of Policy 1.3) and ‘expands access to education’ (of Policy 4.1).

The LVPC offers the following additional comments:

Multimodal Accessibility

The project site contains opportunities to ‘connect assets to diverse transportation options’ (of Policy 1.3). The LVPC strongly recommends that the existing sidewalk terminating at the northernmost corner of the property be extended along the Klines Lane

property frontage, connecting to the existing sidewalk beginning at Minor Street and Klines Lane to the southeast. The addition of sidewalk in this location would close a gap in the Borough's sidewalk network and 'promote safe routes to schools and playgrounds' (of Policy 5.2).

The project site is adjacent to a trailhead for the Robert Rodale South Mountain Gateway Trail, an Existing Regional Land Trail that facilitates north-south connections between the City of Allentown and Emmaus Borough. This trail is also identified as an alternative route for the Mack Boulevard/Emaus Avenue bicycle commuting corridor in the *Walk/Roll LV: Active Transportation Plan* and provides access to the active recreation trails of the Wildlands Conservancy South Mountain Preserve. Trails in this area are also conceptualized in the Draft Borough of Emmaus Greenways & Trails Plan, currently open for public comment. Constructing sidewalk along Klines Lane would better 'encourage alternative travel options' (Policy 2.1) and support active lifestyles that 'promote physical and mental health' (Policy 5.3).



Additionally, Minor Street beginning at Klines Lane is identified as a Proposed/Conceptual Regional Land Trail that could facilitate an extension of the trail southwest through the Borough. Infrastructure improvements such as signage, shared lane markings or bicycle storage racks that 'strengthen sidewalk, bike route and trail infrastructure' (of Policy 5.3). These recommendations are provided to 'encourage local institutions to invest in their surrounding communities (of Policy 4.1)

Environmentally Sensitive Building and Landscape Design

The LVPC recommends that educational institutions incorporate environmentally sensitive building design and green infrastructure improvements, such as rain gardens and rain barrels, which can be used to capture rain and roof runoff to use for irrigation. These enhancements further academic endeavors related to sustainable technologies, improve campus aesthetics, demonstrate environmental leadership within the region and 'reduce climate change impacts through mitigation and adaption' (Policy 3.4).

Please refer to the LVPC Green Infrastructure Guidelines for design standards and additional information, available at <https://lvpc.org/projects.html>.

The LVPC has copied appropriate representatives from Southwestern Lehigh County Multi-Municipal Plan partner agencies and neighboring municipalities to 'coordinate land use decisions across municipal boundaries' (Policy 1.4).

Municipalities, when considering subdivision/land developments, 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)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Feel free to call me if you have any questions about this review.

Sincerely,



Jillian Seitz
Senior Community Planner

cc: Shane Pepe, Emmaus Borough Manager; Jeffrey Ott, PE, Ott Engineering (Borough Engineer); Amanda Cossman, Seven Generations Charter School; Paul Szewczak, Benchmark Civil Engineering Services, Inc.; Sharon Trexler, Albutis Borough Manager; Nathan Jones, Lower Macungie Director of Planning/Community Development; Emily Fucci, Lower Milford Zoning and Planning Director; Peter Melan, Interim Macungie Borough Manager; Brian Miller, Upper Milford Planning Coordinator

September XX, 2021

Christopher J. Garges, Township Manager
North Whitehall Township
3256 Levans Road
Coplay, Pennsylvania 18037

**RE: Subdivision and Land Development Ordinance Amendment –
Submission Requirements
North Whitehall Township
Lehigh County**

Dear Mr. Garges:

The Lehigh Valley Planning Commission (LVPC) will consider the subject 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 happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

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The proposal considers amending a section of the Township's Subdivision and Land Development Ordinance (SALDO) to require applicants to notify surrounding property owners of the submission of such subdivision and land development proposals in written form. This proposal is generally a matter of local concern and exhibits consistency with *FutureLV: The Regional Plan*. The LVPC recognizes the Township's continued effort to 'facilitate discussion among residents' and members of the community (of Policy 1.4).

Municipalities, when considering ordinance and map amendments, 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 any final amendments that are adopted, per the requirements of the MPC.

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

Sincerely,

Julie Benco
Regional Planner

cc: Jane Kelly, Planning Administrator



GREG ZEBROWSKI
Chair

STEVEN GLICKMAN
Vice Chair

PAMELA PEARSON
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

September 13, 2021

Mr. David Manhardt, Director
Community Development Department
South Whitehall Township
4444 Walbert Avenue
Allentown, Pennsylvania 18104

**RE: Zoning Ordinance Amendment – No/Low-Impact Home-Based Businesses
South Whitehall Township
Lehigh County**

Dear Mr. Manhardt:

The Lehigh Valley Planning Commission (LVPC) will consider the subject 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 happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

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The subject amendment proposes to revise the Township zoning ordinance by amending the current standards for no-impact home-based businesses and creating a new section and standards for low-impact home-based businesses. While this minor proposal is a matter of local concern and exhibits consistency with *FutureLV: The Regional Plan*, the LVPC commends the Township for its thoughtful ordinance amendments that serve as best practices in ‘diversifying the regional economy to strengthen economic resilience’ (Policy 4.2).

Municipalities, when considering zoning changes, 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)].

Kindly send a copy of the final adopted ordinance amendments, per the requirements of the Pennsylvania Municipalities Planning Code (MPC).

Sincerely,

A handwritten signature in black ink, appearing to read "Jillian Seitz". The signature is fluid and cursive, with the first name "Jillian" and last name "Seitz" clearly distinguishable.

Jillian Seitz
Senior Community Planner

cc: Tori Morgan, Township Board of Commissioners President; Randy Cope, Interim Township Manager; Gregg Adams, Township Planner