LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, August 26, 2021, at 7:00 PM
Via Microsoft Teams

AGENDA


Roll Call

Courtesy of Floor

1. Loss of a Giant, the Passing of Mike Kaiser

Chairman’s Report

1. Local Climate Action Program Gearing-Up

Minutes

1. ACTION ITEM: Minutes and Review of Roll Call Actions of the July 22, 2021, Commission Meeting

Comprehensive Planning Committee:

1. ACTION ITEM: Lower Nazareth Township and Bethlehem Township – Land Use of Regional Significance – Lehigh Valley Trade Center III (JS)
2. ACTION ITEM: Upper Saucon Township – Land Use of Regional Significance – Good Shepherd Rehab Hospital (JS)
3. ACTION ITEM: Plainfield Township and Wind Gap Borough – Land Use of Regional Significance – 905 Pennsylvania Avenue (JS)
4. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (JS)

Environment Committee:

1. ACTION ITEM: Committee Summary Report (GR)
2. INFORMATION ITEM: PADEP – Final Rulemaking: CO2 Budget Trading Program (GR/BB)

Transportation Committee:

1. INFORMATION ITEM: Infrastructure Funding Potential (PC)

Old Business:

1. INFORMATION ITEMS: Activity Reports:
   b. Highway Traffic Monitoring (PC)
New Business:
1. INFORMATION ITEM: 8th Annual LVPC Gala and Awards, October 12, 5:30 PM, Virtual (MA/BB)
   o How do you think we can maintain the Lehigh Valley as a great place to live, work and play and where should we go next? Tell us by taking this short survey by its closing date of August 31st here: https://www.surveymonkey.com/r/3X35Q5T

Executive Director’s Report:
1. None.

Communications, Public Engagement and Participation:

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. Local Technical Assistance Programs
      i. Stormwater Facility Operation and Maintenance, August 31, 8 am to Noon
      ii. PennDOT Traffic Signal Maintenance Agreements (1 Hour), September 2, 11 am to Noon
      iii. Conducting Sign Retroreflectivity Inspections, September 7, 8 am to Noon
      iv. Introduction to Traffic Studies, September 14, 8 am to Noon
   b. Transformative Talk:
      i. Today’s Planning: What Local Governments Need to Know August 26th @ 12:00 pm http://tiny.cc/TTalk0826
         Via the phone 610-477-5793, Conference ID: 748 072 017#
   c. Lehigh Valley Government Academy:
      i. Community Planning
         1. September 13, 20 & 27 from 5:30 – 9:00 pm
      ii. Zoning Administration
         1. October 13, 20 & 27 from 5:30 – 9:00 pm

Next Lehigh Valley Planning Commission Meeting:
Thursday, September 23, 2021, at 7:00 pm
LEHIGH VALLEY PLANNING COMMISSION
Minutes from the Thursday, 22nd 2021 Meeting

Due to the COVID-19 Pandemic, the LVPC held a virtual public meeting on Thursday July 22nd, 2021. The meeting was advertised in the Lehigh Valley Press on Thursday July 8th, 2021.

Mr. Zebrowski chaired the meeting.

Ms. Amofah took Roll Call.

Members in Attendance:

**Lehigh County**
Percy Dougherty, Bob Elbich, Steven Glickman, Michael Harakal, Kent Herman, Jamie Johnson, Joyce Moore, Christina Morgan, Owen O'Neil, Stephen Repasch, and Kevin Schmidt.

**Northampton County**

Members Absent:

**Lehigh County**

**Northampton County**
Janell Connolly, Robert Donchez, Darlene Heller, Kevin Lott, Carl Manges, Lamont McClure, David O'Connell, Salvatore Panto, Spirit Rutzler and Gerald Yob.

Staff Present: Matt Assad, Becky Bradley, Tracy Oscavich, Brian Hite, Paul Carafides, Denjam Khadka, Craig Kackenmeister, Geoff Reese, Jill Seitz, Samantha Smith and Yvonne Amofah

Public Present: Melissa Starace and Ted Strohl

COURTESY OF THE FLOOR
None
CHAIRMAN’S REPORT

Mr. Zebrowski welcomes New Team Members: Mr. Paul Carafides, Director of Transportation Planning and Data and Mr. Denjam Khadka, Senior Civil/Stormwater Engineer. Mr. Carafides and Mr. Khadka introduce themselves and provide a summary of their experience and qualifications, as well as sharing their gratitude to be a part of LVPC. Mr. Repasch shared his congratulations and further welcomes Mr. Carafides and Mr. Khadka. Mr. Zebrowski reads a summary of Mr. Hite’s work history with LVPC and then congratulates him on his promotion to Transportation Planner. Mr. Zebrowski asked if anyone on the LVPC Commission has any questions for Brian. No Commission members had questions.

MINUTES

Mr. Zebrowski stated that the minutes of the Thursday June 24th, 2021 LVPC meeting are attached, and he then asked for a motion to approve the minutes. Mr. Dougherty made a motion to approve the minutes and to state that Mayor Harakal was present at that meeting (the mayor was mistakenly marked as absent). Mr. Melnick seconded the motion. The motion passed with Mr. Charles Elliott, Mr. Bob Elbich and Ms. Joyce Moore abstaining.

COMMITTEE REPORTS

Comprehensive Planning Committee

**ACTION ITEM:** Kratzer Elementary School Addition - A Land Use of Regional Significance in South Whitehall Township.

Ms. Seitz reviewed a Land Use of Regional Significance in South Whitehall Township proposing to construct an 18,589-square-foot addition to the existing Kratzer School (2200 Huckleberry Road). The proposal exhibits consistency with FutureLV because it is located in the Development area of the General Land Use Plan and serves to ‘enhance the long-term viability of assets’ (of Policy 1.3). The LVPC strongly encourages educational institutions to incorporate sustainable practices into facility design to ‘reduce climate change impacts through mitigation and adaption’ (Policy 3.4). Ms. Seitz asks Commission members if they have any questions. No question were asked of Ms. Seitz. Mr. Zebrowski asked the Commission to make a motion to accept the staff comments. Mr. Elbich makes the motion, Ms. Moore seconded the motion. Motion passes with Ms. Morgan abstaining.

**ACTION ITEM:** Lafayette College: Markle Hall Parking Deck - A Land Use of Regional Significance in the City of Easton.

Ms. Seitz reviewed a Land Use of Regional Significance in the City of Easton proposing to demolish an existing parking structure and redevelop the site with a larger parking deck and related improvements. The project is located on North Campus Lane between Fisher Stadium to the north and Markle Hall to the south. The proposal exhibits consistency with FutureLV because it supports ‘reuse of vacant and underutilized properties’ (of Policy 5.4) and increasing parking capacity to serve Lafayette College supports expanding access to education and job training (of Policy 4.1). Ms. Seitz states that after conversations about sustainability at the comprehensive planning committee meeting, Commissioner Manges reached out to the engineer to find out if they have any solar initiative planned for this project. The engineer informed the Commissioner that the solar panels were considered for the parking desk project but were found to be impractical. Mr. Zebrowski asked if there are any comments or questions. Mr. Glickman asked Jill “you said this was in a historic district”? Is it local or national district? Ms. Seitz states that it’s a national district. Mr. Zebrowski thanks Commissioner Manges for his inquiry with engineer. Mr. Zebrowski also commends Lafayette college for trying to use solar panels, even though it was not
possible. Mr. Zebrowski calls for a motion to accept staff comments. A motion was made by Mr. McGee and seconded by Ms. Pearson. Motion passes with Mr. Charles Elliott abstaining.

**ACTION ITEM:** Lafayette College: Temporary Parking Lot - A Land Use of Regional Significance in the City of Easton.

Ms. Seitz reviewed a Land Use of Regional Significance in the City of Easton proposing to construct a temporary parking lot to serve Lafayette College at the block bounded by McCartney Street, Marquis Street, Clinton Terrace and March Street. The proposal is located at the site of the previously submitted McCartney Street Housing and Wellness Center proposed by Lafayette College and exhibited consistency with *FutureLV* when reviewed by the LVPC in June last year. This project is associated with the parking deck proposal we just saw, serving as temporary parking while the parking deck is constructed. The LVPC commends the dual use of this site to meet parking needs of Lafayette College prior to beginning construction on the previously proposed development, which supports reuse and redevelopment in an urban area (of Policy 1.1), while ‘capitalizing on existing infrastructure’ (Policy 2.2). No questions were asked of Ms. Seitz. Mr. Zebrowski asked the Commission to make a motion to accept staff comments. Ms. Moore makes the motion, seconded by Ms. Dreisbach. Motion passes with Mr. Charles Elliott abstaining.

**ACTION ITEM:** Readington Farms - Land Use of Regional Significance – Upper Macungie Township.

Ms. Smith reviewed Land Use of Regional Significance in Upper Macungie Township, a ‘local freight generator’ proposing to subdivide a 48.2-acre lot from an existing parcel for the construction of a 273,471-square-foot food/dairy manufacturing facility at 8550 Main Street. The proposal is located within a Preservation Buffer of the General Land Use Plan, an area ‘where factors may be present and capable of accommodating additional development’ and additional planning analysis of development criteria is encouraged. The property is adjacent to Interstate 78 (I-78), near the interchange at State Route 100, where transportation improvements are being planned and coordinated. Based on these factors, the proposal exhibits consistency with *FutureLV*, though several outstanding issues exist as outlined in the review. Specifically, Ms. Smith reviewed the extensive presence of karsts in the form of surface depressions throughout the site and recommendations to increase landscape materials and incorporate sustainable systems. To ensure adequate stormwater capacity continues to remain available into the future – particularly as it relates to I-78 – continued coordination should include the LVPC, PennDOT, USDOT Federal Highway Administration (FHWA), Lehigh County Authority and any other entities which may be appropriate. This proposal includes only the land development plan for Readington Farms and does not include any changes to the roadway network. Per the Pennsylvania Municipalities Planning Code, the LVPC is prepared to review future development proposals pertaining to roadway infrastructure. Improvements to the transportation network are crucial to managing impacts to Fogelsville, and to the success of not only this proposal but also to future expansion of I-78 and the potential Adams Road Interchange, which is currently included in a point of access study. A partner engagement meeting was held for this proposal earlier in the month. During the meeting, discussion included the potential to improve the plans based on stated concerns regarding pedestrian and transit access, electrical hook-ups and emergency access. The LVPC is encouraged that these recommendations are being thoroughly considered.

Mr. Zebrowski asked if there are any questions or comments. Mr. Dougherty recants his vote against this, made at the committee meeting, due to Ms. Smith giving a detailed presentation alleviating his previous objections. Mr. Melnick ask that the language in Ms. Smith’s presentation be strengthened regarding geotechnical testing. Ms. Smith says she can strengthen the language. Mr. Zebrowski says the area is sinkhole prone. Mr. Repasch says there is a powerful drinking well there and questions the volume of wastewater. Mr. Reese says they are proposing a treatment facility on-
site to deal with the bio-chemical demands. Ms. Bradley says they need permission to run pipes under I-78 from the federal government and that the development will take a while for approval at the municipal level. Mr. Zebrowski calls for a motion to accept the staff comments. Mr. McGorry makes the motion, seconded by Mr. Elbich. Motion passes with no abstentions.

**ACTION ITEM:** Comprehensive Planning Committee Summary Sheet
Mr. Melnick presented the July Comprehensive Committee items with staff presenting information. Mr. Zebrowski says the ‘Martin Tower’ project is too car-centered, with not enough walking space. Mr. Zebrowski calls for a motion to accept the staffs’ comments. Mr. Dougherty makes the motion, seconded by Ms. Dreisbach. Motion passes with Mr. Charles Elliott abstaining on the City of Easton item.

**Environment Committee:**
**ACTION ITEM:** Environment Committee Summary Sheet
Mr. Repasch stated that the Environment Committee Summary Sheet is in the packet for review. Mr. Zebrowski calls for a motion to accept the staff comments. Mr. Repasch makes the motion, seconded by Mr. Melnick. Motion passes with no abstentions.

**Transportation Committee:**
**ACTION ITEM:** Street Vacation, Portion of Mason Street, City of Allentown
Mr. Herman presented the Street Vacation for a portion of Mason Street in the City of Allentown. Mr. Hite makes comments. The proposed Street Vacation for the unopened portion of Mason Street from South Jute Street and South 4th Street also known as State Route 145 in the City of Allentown was submitted by Michael P. Hanlon of the City of Allentown on behalf of the petitioner LLT Property, LLC of 1902 South 4th Street, Allentown PA 18103. Currently this portion of Mason Street is inaccessible to vehicular traffic due to the elevated construction of the existing parking lot retaining wall on the west side of 1902 South 4th Street at Jute Street. The petitioner explains this section of Mason Street is being utilized by LLT Property, LLC and serves no public purpose. The proposed plan submitted for recommendations under Section 304 of the Pennsylvania Municipalities Planning Code was reviewed for general consistency with the intent of *FutureLV: The Regional Plan*. Street vacation requests require all abutting property owners to agree to the street vacation, along with the City of Allentown. LLT Property, LLC, through their legal representatives did attempt to contact the adjacent property at 1869 South 5th Street owned by AutoZone Inc of Memphis TN on March 3, 2021, and February 25, 31 2021, to get their concurrence with no response to date. The transportation review of proposed street vacation does not appear in conflict with any proposed transportation plans. Mr. Herman on behalf of the Transportation Committee makes the motion to accept the staff review as presented, pending any further discussion. Mr. Zebrowski asks for any questions or comments. There were none. Mr. Repasch seconded the motion. Motion passes with no abstentions.

**Old Business:**
**FOLLOW-UP REQUEST:** RAISE Grant Application for Riverside Drive Letters of Support
Riverside Drive USDOT RAISE grant request. Mrs. Oscavich noted the Executive Summary of the grant request on page 29 of the packet. Mrs. Oscavich indicated the LVPC has applied for the United States Department of Transportation, Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant on July 12th. The Riverside Drive Multimodal Revitalization Corridor is a 3-mile transformation creating a robust, multimodal commuting, emergency management and equitable access corridor stretching from the City of Allentown through Whitehall Township. The driving theme behind this shovel-ready project is providing safe, healthy and efficient transportation mode choices by connecting roadways, transit, sidewalks and trails into a more equitable and sustainable system. Mrs. Oscavich asked the
Commission to tell USDOT to support this project by visiting RAISERiversideDrive.com and click on the “Show your support” button to send the letter directly. Mr. Zebrowski asks Mrs. Oscavich when we will know the outcome. She says around Thanksgiving.

**INFORMATION ITEMS: Activity Reports**

*Mid-Year Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans and Traffic Reports*

Ms. Bradley presents comments. In June we saw 17 Subdivisions, 23 Development proposals, 6 reviews for Stormwater Management, and 5 Municipal Ordinances and Maps for a total of 51 reviews. Aside from subdivisions and lot line adjustments, residential development made up the bulk of those reviews, with 679 total housing units proposed in June. Apartment proposals were especially high at 469 units, the most we have seen in a month so far this year. Single-family detached units were up there, too, at 184 units, and we saw 24 new townhouses and two twin dwelling units proposed. About half of the apartment proposals are located in Allentown and the City of Bethlehem, and many of the apartment, single-family detached, and townhouse units are in Upper Macungie. However, on the non-residential side, proposals were fairly low in June with a total at just under 189,000 square feet. About half of that is from Public/Quasi-Public investments by health care facilities. We had only 51,600 industrial square feet, 6,500 retail, a little over 9,000 of commercial and a little under 9,000 of office space. Lastly, in the agricultural category we saw a final plan for a 20,160-square-foot duck barn in Weisenberg Township. While non-residential numbers were low for June, these bring us to the mid-year point, so wait until you see how all these month-to-month numbers add up so far in 2021.

We’re past the midway point for the year, so we have the six-month BuildLV report to present, and the theme for the first half of the year is more. As in more housing, and more industrial proposals than we’ve seen in a long time, but also more diversity – and that’s a good thing. Overall, our reviews included 79 minor lot line adjustments and 145 development proposals. That’s a total of 224 subdivision and development reviews, compared to 189 last year at this time. We also did 80 reviews for stormwater management and 26 for municipal ordinances. Those are about on pace with last year’s totals. One thing well ahead of last year’s pace is our housing numbers.

There were 2,545 housing units proposed. That’s more than 500 more units above what was proposed in a very busy 2020. And it can’t come soon enough because, as we’ve been detailing all year, our housing market is overheated. That number includes 932 single-family detached homes, 413 townhouses, 1,122 apartments, 58 twins and 20 condos. That townhouse number is more than triple last year’s number. So, you can attribute virtually all of this year’s increases to the additional 290 townhouses and 327 apartments over last year. Of note on the residential side of things is a 400-unit development proposed in Lower Macungie Township, and the fact that there has been very few large housing developments this year. Most were smaller community infill projects, the type that 40 are recommended by FutureLV.

On the non-residential side, we had roughly 7.1 million square feet of proposed development, and not surprisingly more than 75% of it was for warehouse and distribution space. If that seems like a lot, it’s because it is. The 5.5 million square feet of warehouse space is more than twice what we had by this time last year. We’ve had several large warehouse proposals, including multiple projects in Forks Township in what continues to be an evolving industrial park there, and one we’ve talked about several times here – the first project in River Pointe Logistics Center in Upper Mount Bethel Township.
Other non-residential included 433,298 square feet of commercial, 151,801 square feet of office, 148,499 of public/quasi-public, and 33,863 square feet of retail. We had 115,623 square feet of transportation development, and while that number doesn't rival those giant industrial numbers, it involves some pretty interesting stuff. It includes portions of the Riverside Drive project in Allentown on the developer's site itself, a proposal for a new paratransit facility for LANTA, improvements at the security checkpoints at LVIA, and new parking garages in Allentown and Bethlehem. So, this year has included lots of encouraging development and more diversity in new housing proposals, but if there's one number, we'll have to keep close watch on, it's the acreage being used. That was dropping for years but came in at 2,779 acres for the first six months. That’s nearly 1,000 more acres more than by mid-year 2020. And as it turned out, 2020 really got busy late and closed with more than 4,600 acres, so we'll be keeping an eye on the number of acres proposed for development as this year progresses. As we’ve noted several times during this Pandemic, the comparison even to the early part of the Pandemic in 2020 remains fair because while much of the world shut down, proposals didn't slow down during that period for us. I think it’s safe to say, we can expect more of the same for the remainder of 2021 and beyond. Mr. Zebrowski asks the Commission if they have any question. No questions.

*Highway Traffic Monitoring*

Mr. Carafides and Mr. Hite presented a mid-year review of the Traffic Count Data. The Traffic Count Data for years 2019, 2020 and 2021 were compared at multiple locations including Interstate 78 and Route 33. In all cases, due to the pandemic, there was a significant drop in passenger vehicles during 2020. However, during the same time truck traffic increased year over year. This is consistent with the continued rise in e-commerce and industrial development in the Region. In conclusion, Mr. Hite stated that Traffic Count Data will continue to be a critical element of our planning for our transportation networks and sustainability.

**New Business:**

**INFORMATION ITEM:** Draft Community Guidance on Personal Shooting Ranges

Ms. Bradley presents the draft Community Guidance Memo on Personal Shooting Ranges. Ms. Bradley reviews the reasoning behind the guidance document, a Commonwealth Court case – with the potential to impact planning and zoning decisions statewide – regarding a Stroud Township in Monroe County and a property owner's right to discharge firearms as a personal shooting range. There is a Monroe County property owner who took Stroud Township to court over a zoning permit application denial for a personal shooting range. On the basis that his denial was a violation of his constitutional second amendment rights. So, after moving through the county court system then up to the Commonwealth in May. The Commonwealth Court decided in favor of the property owner. So basically, the court ruled that the Township did not meet its burden under the immediate scrutiny standard to justify an outright ban on personal shooting ranges at a person’s residence because it did not establish that the ordinance does not burden more conduct then is reasonably necessary. Ok so what does all that mean? It means that somewhere in every community personal shooting ranges will need to be allowed, unless the community is part of a multi-municipal plan, then the group of communities will need to determine where this use should be allowed. At the end of the day there is already a lot of types of shooting ranges all over the Commonwealth and certainly in Northampton and Lehigh counties. So, we quickly put together things to think about. We’re going to do a little bit more research on this and get this out to the communities later this year as part of the all-community General Assembly. But if you do have an outdoor range, that’s a lot different than an indoor range. If your range is located in an urban environment, it’s a whole lot different than a suburban environment. If it’s a business or a gun club that’s different than personal. Once you start regulating one type of shooting range, communities will need to think through regulations for a
variety of types of shooting ranges. Mr. Zebrowski asks does anyone have any question? No question asked.

**INFORMATION ITEM: Pennsylvania Department of Environmental Protection Local Climate Action Program**

Mr. Zebrowski said the next item on the agenda is the Pennsylvania Department of Environmental Protection Local Climate Action Program presented by Ms. Oscavich. Good news to report today. On July 1, we were notified that we were accepted into the PA Department of Environmental Protection Local Climate Action Program! The program provides technical assistance to help create a Lehigh Valley greenhouse gas inventory and then enhance climate action planning. We are awaiting full details of the program from DEP. We will keep the Commission updated on the details as they are available, but we wanted to share the good news that the counties and all 62 municipalities will be working towards a more robust climate action strategy over the next year to two. We’ll be coordinating with many communities and non-profit partners over the planning process and the two counties will be leadership, as well. Mr. Zebrowski asks the Commission if anyone has any questions. No questions.

**Executive Director’s Report**

None.

**Communications, Public Engagement and Participation:**

**INFORMATION ITEM: The Mid-Year Web Report**

Mr. Kackenmeister presented about the Mid-Year Website Report. The LVPC website is one of our best tools in getting all of the important data and information to the public. The short answer for why our web traffic is staying strong is DataLV and FutureLV. DataLV had over 6,200 views and FutureLV garnered more than 1,900 page views. The DataLV Housing page had the most page views for a landing page with just over 2,500 views, thanks to the Jobs + Housing At Risk analysis in partnership with the Federal Reserve Bank of Philadelphia. We also updated the Lehigh Valley housing attainability and impacts to Lehigh Valley School Districts. Finally, the 48 updates of the regional housing market report, which not includes the latest Housing and Sales rental activity, rounded out the new data released in early 2021. Other pages in the top 10 list of most views include two of our new pages, Subdivision + Land Development Online Application page and the About Us landing page, along with old standards like our staff listing – which is how people reach us by phone and email. There are also likely quite a few hits that we don’t see here. I’m quite certain that Becky’s monthly column gets hundreds and maybe thousands of hits every month, but those are collected by the Morning Call’s website, rather than ours. Mr. Zebrowski asks the Commission if there are any questions, no questions.

**INFORMATION ITEM: Morning Call Business Cycle Column**

Mr. Assad summarized the last Business Cycle column, which published Sunday, July 18. He explained that the column, by Ms. Bradley, detailed how targeted investments such as the $1.4 million in Transportation Alternative Set-Aside (TASA) grants and taking the Local Technical Assistance Program into the field to help municipalities can have a big impact in the community by educating students, improving safety and promoting a healthy community. Mr. Assad also explained that the programs were designed to foster a linkage between health and transportation and the column gives readers details on how they could help the region earn a $23 million federal grant to
help build a key three-mile commuter trail and road from the Allentown’s waterfront to Whitehall Township.

**INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1!**

Mr. Assad summarized the LVPC’s recent Plan Lehigh Valley WDIY radio show that aired July 5. The show covering the LVPC’s TASA and Tech Assist programs, and how they provide an important investment in the new vision for a healthy transportation system. Joining Ms. Bradley and Mr. Assad on the show were LVPC Transportation Planner Brian Hite, who provided expertise on the tech assist program, and Coalition for Appropriate Transportation Executive Director Scott Slingerland, who talked about using the TASA grant to provide bicycle safety and maintenance education to thousands of children across the region. Mr. Assad stated that the next Plan Lehigh Valley show will cover the BuildLV: Mid-Year development report, and will air August 2, on WDIY 88.1 FM. All of the past shows are currently streaming at wdiy.org.

**INFORMATION ITEMS: Engagement and Participation**

Mr. Assad announced that:

1. Local Technical Assistance Program - LTAP has a full schedule of virtual classes right into September, beginning July 27 with its Roadside Vegetation Control class. PennDOT has sort of settled into a rhythm with these virtual classes, scheduling about one a week. Most of them are from 8 am to noon, but you can see a few there are one-hour classes. As always, they’re all free and you can still sign up at lvpc.org/ltap. Or call Brian Hite.

2. Two Transformative Talks scheduled for August. The first is something you all got a preview of tonight, the BuildLV Mid-Year Report: The Pressure of Development. It will be a deep dive into the rush of new housing and industrial development proposed in the first six months of the year, how it compares to recent years, and what it all means. We’re scheduling that one for Friday, August 6, from noon to 1 pm, and you can sign up at lvpc.org/events. Transformative Talk titled Today’s Planning: What Local Governments Need to Know. This is really something that can benefit every community, developers, engineers and really anyone who has to navigate the planning process. This will also be Thursday August 26, from noon to 1 p.m., and anyone can sign up for the virtual webinar at lvpc.org/events.

3. Lehigh Valley Government Academy: These will be our first in-person training of the year, so there will be social distancing and much smaller classes than we’re used to having. Seating will be a max of 18, so seating is extremely limited. But we know these are very popular and it’s really important that our next generation of community leaders have a place to learn how planning, development, zoning and local government work. We’re starting with two classes. Community Planning will be on three consecutive Mondays, September 13, 20 and 27. And Zoning Administration will be three consecutive Wednesdays October 13, 20 and 27. All the classes tend to run from 5:30 pm to 9 pm, each evening. You can sign up online at LVPC.ORG.
ADJOURNMENT
Mr. Zebrowski stated that the next LVPC meeting is set to be virtual. Mr. Zebrowski asked for a motion to adjourn the meeting; Mr. Harakal made the motion. Ms. Moore seconded the motion. Mr. Zebrowski then adjourned the meeting.

Submitted by:
Becky Bradley, AICP, Executive Director and
Yvonne Amofah, Secretary
August 27, 2021

Ms. Lori B. Seese, Planning Director
Lower Nazareth Township
623 Municipal Drive, Suite 220
Nazareth, Pennsylvania 18064

Ms. Amanda Raudenbush, AICP
Bethlehem Township Planning Director
4225 Easton Avenue
Bethlehem, Pennsylvania 18020-1496

RE: Lehigh Valley Trade Center III – REVISED COMMENTS
Land Use of Regional Significance
Lower Nazareth Township and Bethlehem

Dear Ms. Seese and Ms. Raudenbush:

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Significant discussion occurred at both meetings and a revised follow-up letter is below.

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 295,750 square feet located in Lower Nazareth Township and the other 299,796 square feet located in Bethlehem Township. The project totals 595,719 square feet and is located at 4733 Hanoverville Road (parcel numbers L6 20 11 0205, L6 20 07 0418 and L6 20 11 0418).

While the proposal generally exhibits consistency with the General Land Use Plan Map because it is located in an area designated for Development that has seen growing development proposals and industrial uses, multiple aspects of the proposal exhibit inconsistency with policies of FutureLV: The Regional Plan and must be addressed in order to support the long-term interests of the townships, County and region.

Traffic Impacts and Congestion
The LVPC reviewed a Master Transportation Impact Assessment (TIA) for the subject application. Based on the combined square footage of the two buildings proposed, the cumulative new trips anticipated to be generated is an average of 1,037 vehicle trips per day, of which 357 are tractor-trailers (Institute of Transportation Engineers Trip Generation Manual, 10th Edition).

The segment of Hanoverville Road and Jaindl Boulevard between Airport Road and Nazareth Pike is identified as a Future Congested Corridor (MoveLV Congestion Management Process). Additionally, the intersection of Hanoverville Road and Route 191
(approximately 1 mile east of the proposed site entrance) is identified as an intersection with substantial traffic safety concerns by Lower Nazareth Township and the Pennsylvania Department of Transportation. The traffic impacts of this development, in conjunction with existing and approved freight-based businesses along this corridor, must be assessed in consideration of the entire regional transportation system (of Policy 2.4) to ‘enhance incident management strategies’ (of Policy 2.2). Right-sizing transportation infrastructure projects that improve the efficiency infrastructure (Policy 2.2) is fundamental the long-term operations of any business and most importantly, the health, safety and general welfare of the public. Adding any additional traffic, especially through freight and transportation-based businesses is unreasonable given the current state of the infrastructure to and from and around the proposed development site. Commencing an assessment of nearby transportation infrastructure as soon as possible is strongly recommended. The assessment should include the developer, nearby industrial property owners and businesses, both Townships, Northampton County and the Pennsylvania Department of Transportation.

Weight-Restricted Bridge
A weight-restricted bridge on Hanoverville Road crosses the Monocacy Creek and is owned by Northampton County. A posted weight limit of 10 tons poses issues for both truck and transit accessibility to the site. The bridge condition report is indicated with a ‘fair condition’ rating and is of concern considering the growing industrial uses in the area. Proper signage is required to indicate the routing of trucks westward to Route 512 (of Policy 2.4). As there is no guarantee that truck drivers will follow the signage as indicated, the LVPC identifies the weight-restricted bridge as a critical issue that must be addressed immediately. The LVPC recommends that a Northampton County representative attend both township planning commission meetings to request that the developer finance the reconstruction of the bridge to sustain the weight of freight vehicles and expand the capacity of transportation infrastructure ‘to meet changing needs of the region’ (of Policy 2.6).

Tractor-Trailer Access and Accommodations
No tractor-trailer parking spots are provided on the plans outside of the loading dock areas. The parking spaces included are sized for trailers only. The LVPC strongly recommends providing on-site tractor-trailer staging and parking areas to ‘expand truck parking options and amenities’ (of Policy 2.4), especially in consideration of those that may not be legally allowed to leave the facility due to hours of service limitations or other regulatory requirements as dictated by state and federal laws. Additionally, spaces should be provided to accommodate overnight parking, with sufficient amenities such as driver facilities and electrification of truck parking stalls that limit tractor-trailer idling for emission reduction to ensure compliance with the 2008 Pennsylvania Diesel Idling Law and support the improvement of air quality. These accommodations keep truck drivers safe and eliminate their need to park on road shoulders and in residential areas, to ‘strengthen freight mobility to minimize quality of life impacts to residents’ (Policy 2.4).

The guard shack associated with the northernmost building poses potential queuing concerns caused by limited site access. The available queuing space for trucks waiting to enter past the guard shack should be illustrated to prevent internal obstructions to the efficient movement of vehicles along the internal driveways and access roads.
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. The LVPC recommends the installation of a snow-clearing tool at the site that would easily allow for truck drivers to clean off tractor-trailers to help ‘provide a safe, well-maintained transportation network’ (Policy 2.2).

The additional usage on the roadways system and nearby bridge are serious considerations and the burden of improvements and maintenance should not be born solely by the public. LVPC recommends that all entities ‘advocate for sustainable, long-term transportation funding solutions’ as a measure of maintaining the viability of infrastructure system (of Policy 2.1). After all, without adequate roads and bridges the businesses, public transit, emergency management services and community as a whole do not function properly. When the infrastructure system does not function decline is assured.

Multimodal Accessibility

The LVPC applauds the inclusion of a bike path along the Hanoverville Road property frontage. Internal sidewalks are provided along the proposed buildings and automobile parking areas, however no connection to an external sidewalk network is proposed. The LVPC recommends ensuring that bicyclists and pedestrians can safely access the site to provide a safe transportation network (Policy 2.2) and ‘reduce bicycle and pedestrian fatalities to zero’ (of Policy 5.1). Additionally, bicycle racks in a visible and safe secure location are recommended to ‘encourage alternative travel options’ (Policy 2.1).

Further inclusion of pedestrian infrastructure helps ‘improve connections between bus stops and pedestrian and bicycle infrastructure’ (Policy 5.2) and can set a precedent for future development and corridor improvements. The Lehigh and Northampton Transportation Authority (LANTA) does not currently provide fixed-route public transportation in the vicinity of the project site, due to the weight-restricted bridge on Hanoverville Road which prevents fixed-route buses connecting through to Route 191 to the east, and there is a lack of adequate space for buses to efficiently turn around on private properties. However, the proposed bike path and additional pedestrian improvements greatly increase LANTA’s ability to consider reintroducing service as pedestrian improvements continue along Hanoverville Road. The project site is located within the LANtaFlex Route 506 zone, a reservation-based service available to the general public and regular LANtaBus fares apply.

LANTA recommends direct early engagement with LANTA’s Planning Department at 610-439-1376 if the developer has any questions regarding future transit and associated transit supportive land use opportunities, as well as the LANtaFlex zone information.

Job Access

Transit service plays a critical role in getting employees to and from work across the Lehigh Valley. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation is imperative to the economic success of this development, and to ‘improve mixed-transportation access to areas with high or growing employment opportunities’ (of
Policy 4.3).

**Landscaping and Sustainability**

The LVPC commends the inclusion of natural landscaping throughout the site and along the property frontage that provide health benefits and ‘improve access to green spaces’ (of Policy 5.3).

The applicant is encouraged to consider the financial benefits of incorporating sustainable systems into facility functionality. Sustainable utilities, such as geothermal energy systems and greywater reuse for irrigation and plumbing reduce overhead operational costs while also ‘minimizing environmental impacts of development’ (Policy 3.1) and supporting ‘renewable energy and diversification of sources’ (of Policy 3.4). Incorporating sustainable practices into building design and facility operations is a key component of ‘reducing climate change impacts through mitigation and adaptation’ (Policy 3.4) by helping to offset 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. Comments relative to our review of the project’s stormwater management plan are included as Attachment 1.

The LVPC has copied appropriate representatives from the partner agencies of the Nazareth Area Multi-Municipal Plan and adjacent municipalities to ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4). The LVPC urges continued and frequent conversation between the Townships, LVPC and project partners to ‘expand collaboration on planning and development between neighboring municipalities’ (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 §105, Article III§303, §304 & §306(a), Article VI§603(jj)]. 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.

If this proposal moves forward for approval, please call or email myself or another Community Planning staff person for information on how to obtain LVPC signatures on the final plans.

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

Sincerely,

Jillian Seitz
Senior Community Planner

cc: Albert Kortze, PE, Lower Nazareth Township Engineer; Brian Dillman, PE, Bethlehem Township Engineer; Adam Citrullo, PE, Bohler Engineering; Brian Boyer, PennDOT; Derrick Herrmann, PennDOT;
Tina Smith, Northampton County Department of Community and Economic Development Director; Mark Hartney, Northampton County Department of Community and Economic Development Deputy Director; Michael Emili, Northampton County Public Works Director; Andrew Elliott, Northampton County Public Works Deputy Director; Matt Nunn, Applicant; 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; John Becker, Moore Township Planning Commission Chair; 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; Darlene Heller, City of Bethlehem Director of Planning & Zoning; Gerald Gasda, Freemansburg Borough Interim Manager; Theresa Sidor, Glendon Borough Secretary; Cynthia Carman Kramer, Palmer Township Planning Director; Craig Kologie, Lower Saucon Township Planning Commission Chair; Molly Wood, LANTA Planner/Land Use Specialist; Daniel Ahn, Northampton County Conservation District Engineer; Geoff Reese, LVPC Director of Environmental Planning; Paul Carafides, LVPC Director of Transportation Planning and Data
August 12, 2021

Ms. Samantha Ciotti Falcone, Chair
Upper Saucon Township Planning Commission
5500 Camp Meeting Road
Center Valley, Pennsylvania 18034

RE: Good Shepherd Rehabilitation Hospital – Land Use of Regional Significance
Upper Saucon Township
Lehigh County

Dear Ms. Ciotti Falcone:

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
  - August 24, 2021 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

- LVPC Full Commission Meeting
  - August 26, 2021 at 7:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* as a Medical Facility greater than 100,000 square feet. The subject application proposes to construct a 123,923-square-foot rehabilitation hospital at 3200 Center Valley Parkway (parcel number 641594077314).

The proposal generally exhibits consistency with *FutureLV: The Regional Plan* because it is located in the Development area of the General Land Use Plan, where there is growing development interest and access to appropriate transportation and utility infrastructure. It is of note the current location of Good Shepard in Allentown, is also consistent with the regional plan and maintains the highest access to the region’s population in comparison to the proposed location. The LVPC does recognize the need of Good Shepard to expand and therefore, offers the following additional comments for the developer’s and Township’s consideration:
Multimodal Accessibility
The LVPC applauds the thorough inclusion of sidewalks throughout the project site and along property frontages that ‘promote safe and secure community design’ (Policy 5.1). Additionally, the applicant is commended for ‘context-specific design solutions’ (of Policy 5.4) in the curving design of the proposed sidewalks, which generally provide improved aesthetics and experiences for pedestrians and align with the existing sidewalks along Center Valley Parkway.

Pedestrian movements in the vicinity should be scrutinized, particularly regarding safety concerns for pedestrians attempting to cross Center Valley Parkway to access the Promenade Shops. Center Valley Parkway is approximately 80 feet wide, consisting of five lanes of vehicular traffic and has a posted speed limit of 45 miles per hour in this location. The current location of a walkway (blue box below) connecting the proposed building directly to the external sidewalk near the mid-block Promenade Shops access driveway may give pedestrians an unintended false sense of shortest route direction to the shopping center and encourage crossing in this location. The LVPC recommends further consideration regarding traffic controls and the safest and most likely route pedestrians will take between these developments to ‘reduce bicycle and pedestrian fatalities towards zero’ (of Policy 5.1). Pedestrian crossings are always the safest at signalized intersections, especially in high speed corridors like Center Valley Parkway.
The Lehigh and Northampton Transportation Authority (LANTA) provides fixed-route bus service directly to the project site via Bus Route 323 along Center Valley Parkway. The comprehensive pedestrian network included in the proposal supports improved connections between bus stops and pedestrian infrastructure (of Policy 5.2), and the LVPC further commends the inclusion of a sheltered bus stop at the corner of Center Valley Parkway and Saucon Valley Road. The LVPC encourages the developer to coordinate with LANTA throughout the planning process to best ‘enhance transit connections to improve mobility and job access’ (Policy 2.3). LANTA can be reached directly at 610-439-1376 or mwood@lantabus-pa.gov.

As pedestrian, transit and biking accommodations are important to Good Shepard, the Township, LANTA, PENNDOT and the region we encourage continued coordination as the project progresses to meet the global goals of public safety, healthy and accessible multimodal transportation.

Traffic Impacts
The LVPC assessed the estimated number trips to be generated by the development, using the Institute of Transportation Engineers Trip Generation Manual (10th Edition). Once constructed, the proposed facility will generate an estimated, average of 823 new trips per day. Currently, Center Valley Parkway sees an average of 18,028 vehicles per day, based on the Pennsylvania Department of Transportation’s (PennDOT) annual average daily traffic. The LVPC provides these estimates to assist the Township in assessing transportation impacts to ‘improve efficiency of existing infrastructure’ (of Policy 2.2).

The LVPC notes that reconstruction and safety improvements at the intersection of Center Valley Parkway and State Route 309 are anticipated to begin construction in April 2026. While not anticipated to have a significant impact on the subject project, it is likely to at least temporarily affect traffic patterns in the vicinity and is likely a concern for the community.

Landscaping and Sustainability
The LVPC commends the inclusion of natural landscaping throughout the site and along the pedestrian walkways that provide health benefits and ‘improve access to green spaces’ (of Policy 5.3). The applicant is encouraged to consider the additional health benefits and financial benefits of incorporating sustainable systems into facility functionality. Sustainable utilities, such as geothermal energy systems and greywater reuse for plumbing reduce overhead operational costs while also ‘minimizing environmental impacts of development’ (Policy 3.1) and supporting ‘renewable energy and diversification of sources’ (of Policy 3.4). Incorporating sustainable practices into building design and facility operations is a key component of ‘reducing climate change impacts through mitigation and adaptation’ (Policy 3.4). Again, we encourage Good Shepard to work towards a green and sustainable building and site as a natural affinity between the health and resiliency goals of the region and healthcare provider.

Stormwater
The project site is located within the Saucon Creek Watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments relative to our review
of the project’s stormwater management plan are included as Attachment 1.

The LVPC has copied appropriate representatives from adjacent municipalities to ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4) and ‘expand collaboration on planning and development between neighboring municipalities’ (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 ordinance requirements since these items are covered in the municipal review.

If this proposal moves forward for approval, please call or email myself or another Community Planning staff person for information on how to obtain LVPC signatures on the final plans.

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

Sincerely,

[Signature]

Jillian Seitz  
Senior Community Planner

cc: Patricia Lang, Upper Saucon Township Manager; Charles Unangst, PE, Hanover Engineering Associates, Inc.; Scott Kern, KRN Development, Applicant; Laura Eberly, PE, Pennoni Associates, Inc.; Molly Wood, LANTA Planner/Land Use Specialist; Timothy Paashaus, Coopersburg Borough Manager; Emily Fucci, Lower Milford Township Zoning Officer/Planning Administrator; Brian Miller, Upper Milford Township Planning Coordinator; Kerry Rabold, Salisbury Township Planning & Zoning Officer; Leslie Huhn, Lower Saucon Township Manager; Garrett Cook, Lehigh County Conservation District Engineer; Geoff Reese, LVPC Director of Environmental Planning; Paul Carafides, LVPC Director of Transportation Planning and Data
August 27, 2021

Mr. Paul Levits, Chairman
Plainfield Township Planning Commission
6292 Sullivan Trail
Nazareth, Pennsylvania 18064

Ms. Louise Firestone, Administrator
Wind Gap Borough
545 E. West Street
Wind Gap, Pennsylvania 18091

RE: 905 Pennsylvania Avenue – Land Use of Regional Significance
Plainfield Township and Wind Gap Borough
Northampton County

Dear Mr. Levits and Ms. Firestone:

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings were virtual and occurred on:

- LVPC Comprehensive Planning Committee Meeting
  - August 24, 2021 at 12:00 PM
  - https://lvpc.org/meetings.html

- LVPC Full Commission Meeting
  - August 26, 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 is located at 905 Pennsylvania Avenue (PA Route 512) and proposes to construct two warehouses – one being 786,000 square feet and the other 308,000 square feet – and a 19,520-square-foot office and shop. A consolidation of 13 lots into three lots is also proposed to facilitate the development (parcel numbers E8SW2-9-14, E8SW2-9-13, E8-5-1C, E8-4-16E, E8-4-17, E8-4-16, E8-4-16A, E8-5-1F, E8-5-1H, E8-4-22, E8-4-15, E8-4-13A and E8-5-1).

The proposal is located in a pivotal area of the region directly south of Blue Mountain, in the Slate Belt region of the Lehigh Valley that has been seeing increasing rates of proposed development. The project has the potential to exhibit consistency with FutureLV: The Regional Plan if the appropriate considerations are applied to mitigate adverse impacts.

The project site is located in the Development area of the General Land Use Plan, with access to public sewer and water utility infrastructure, is along the Route 512 major corridor identified in the Transportation Plan, and the westernmost access point of the site is located less than 1/3 of a mile south of a northbound entrance ramp to Route 33. However, many roadways in the vicinity are not built to withstand the heavy vehicular traffic the development will generate, and
the LVPC notes several opportunities for site design improvements that would better support the long-term interests of the developer, Township, boroughs and overall region:

**Pedestrian and Transit Accessibility**
The site plan severely lacks consideration of multimodal accessibility. Sidewalks are minimally included only along the employee parking areas and building entrances, and none are proposed along access driveways or along property frontages.

The Lehigh and Northampton Transportation Authority (LANTA) provides fixed-route bus service directly to the site via Bus Route 217 along Route 512. Two existing LANTA bus stops – one eastbound and one westbound – are located at the intersection of Route 512 and Sanders Road. However, these bus stops are not represented on or incorporated into the site plan, and the transportation impact study (TIS) for the project states that ‘Public Transportation is not provided in the vicinity of the proposed warehouse location’ (Page 2). Transit service plays a critical role in getting employees to and from work across the Lehigh Valley. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation is imperative to the economic success of this development, and to ‘improve mixed-transportation access to areas with high or growing employment opportunities’ (of Policy 4.3). In addition, if these industrial facilities are constructed, a portion of the workforce will need transit as an option, as evidenced by nearly all industrial developments of this type around the region. 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.

The proposal’s consistency with *FutureLV* can be improved by providing sidewalks along the Route 512 and Pennsylvania Avenue property frontages and connecting the on-site LANTA bus stop to the proposed building entrances. Pedestrian crossing markings and indicators such as crosswalks and signage should be installed on Route 512 to improve the safety conditions of pedestrians moving between the project site and eastbound bus stop and reduce pedestrian fatalities towards zero (of Policy 5.1). LANTA has the flexibility to relocate the bus stops closer to proposed Industrial Avenue as long as there are pedestrian connections between the bus stops and the main entrances of the proposed buildings. Because traffic is expected to increase along the Route 512 corridor, the feasibility of incorporating the bus stops at a signalized intersection should be explored to improve safe crossings and connections for pedestrians.

The project location and its direct connection to existing bus stops on a main transit corridor provide a unique opportunity to improve public transit accessibility in the Slate Belt area. As current industrial growth trends typically occur outside of existing service areas, LANTA often faces pressures to deviate existing routes to serve new warehouse locations. This proposal provides the opportunity to connect transit to the new development without deviating service. The LVPC urges the project developer and engineer coordinate with LANTA to include the bus stops into the site plan and implement modern bus stop amenities including shelter, lighting, seating and trash receptacles that ‘encourage enhanced transit connections to improve mobility and job access’ (Policy 2.3). *Pedestrian walkways and the..."
bus stops should be lighted using solar energy to ensure pedestrian safety (of Policy 5.1) and ‘promote energy conservation and efficiency’ (of Policy 3.4). Full pedestrian access between the development and existing transit will be beneficial to all future users of the site. LANTA should be included in any future discussions as the plan evolves, and can be reached directly at 610-439-1376 or mwood@lantabus-pa.gov.

Furthermore, the LVPC urges the Township to continue to require pedestrian, bicycle and transit improvements as part of this plan’s advancement thru the land development process.

**Trail Connectivity**

Wind Gap Borough is an Appalachian Trail Community, a federal designation representative of the community’s commitment to promote and protect local and regional trails that provide recreation and transportation benefits to the community. Additionally, the northernmost access point to the Plainfield Township Trail is located just approximately 300 feet south of the project site, on Buss Street. The proposal contains a monumental opportunity for a multimodal corridor trail connection along the proposed Industrial Drive that would facilitate critical east-west trail connections. This connection is absolutely imperative to the County and to the region’s transportation and parks and recreation. The Township is encouraged to require that connections are included into the development. As noted in the previous section on transit, workers need access to the site by more than one transportation mode. This creates a strong pedestrian and bike connection to the workforce of Plainfield, Wind Gap, Pen Argyl and the Slate Belt as a whole. Enhancing transportation options and infrastructure ensuring a strong job market is one of the highest priorities of the Plan Slate Belt multi-municipal comprehensive planning effort and this development should support the general goals of the communities.

Several trail studies give examples of potential connectivity near this site:

- The Two Rivers Area Greenway Trails Implementation Study, prepared in 2008 for the Delaware and Lehigh National Heritage Corridor, identified the location of proposed Industrial Drive as a future trail connection.
  - A trail in this location would facilitate better connections between the Plainfield Township Trail and the Appalachian Trail, approximately 1,500 feet north of the proposed Industrial Drive intersection with North Broadway.
- The Northern Tier Trail Feasibility Trail study, prepared in 2018 for Northampton County, shows an alignment of trail along a portion of the project’s frontage on State Route 512.
- The Plainfield Township Trail is part of the September 11th National Memorial Trail, which becomes an on-road trail at Buss Street and continues west on Route 512 to Alpha Road and North Broadway in Wind Gap Borough.
- The **WalkRollLV: Active Transportation Plan** includes a Bicycling Commuting Corridor - Route 512 from Buss Street to Main Street - that has the potential to facilitate bicycling to work, or bicycling to public transit as a part of a work trip. Recommendations for this area of State Route 512 include:
  - Shared-Use Path: Provide a side path along the south side of Route 512 between the Plainfield Township Trail (Buss Street) and George Street in Pen Argyl.
Pennsylvania Avenue Bike Lanes: Provide a bike lane on Pennsylvania Avenue in Pen Argyl Borough, in the westbound direction and shared-lane markings in the eastbound direction.

An appendix of graphics has been provided at the end of this letter to illustrate the vision these plans and studies have had regarding trail connectivity in the area of the project.

The LVPC recommends ensuring that bicyclists and pedestrians can safely access the site (Policy 2.2) with bicycle racks provided in a visible and secure location. As review of this proposal moves forward, discussions with the developer should involve consideration for how to create trail connections on the site. Trails are an important part of the Lehigh Valley’s identity, and provide transportation opportunities in addition to recreational ones. The LVPC encourages continued conversations with Project Partners for support in ‘connecting regional trails to centers, corridors and historic assets’ (of Policy 4.4).

Traffic Impacts and Congestion

While the project site is appropriately located for traffic traveling northbound on Route 33, vehicles traveling south – or traveling from south to north towards the site – will most likely travel through Wind Gap Borough via South Broadway (Route 512).

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 1,906 vehicle trips per day, of which 658 would be trucks (Institute of Transportation Engineers Trip Generation Manual, 10th Edition). The TIS does not account for the proposed 19,520-square-foot office and shop on Lot 3. The LVPC recommends establishing the purpose for this proposed building, and the anticipated traffic it will generate, so it can be incorporated into the TIS analysis and ultimately improvements related to the impacts of the development be scaled to meet true need.

The proposed road striping at the intersection of proposed Industrial Drive and North Broadway pose traffic safety concerns, due to the incline/grade of North Broadway, and should be further analyzed to ‘enhance incident management strategies’ (of Policy 2.2).

A southbound on-ramp to State Route 33 is only accessible from the site by traveling south on Route 512 or North Broadway. A driver wishing to travel south on Route 33 will travel through the Borough of Wind Gap to the interchange. This will have a significant impact on the Borough and further discussions with the Pennsylvania Department of Transportation should be had and include the Township, Borough and developer.

Additionally, the segment of Route 512/North Broadway in Wind Gap Borough is identified as a Congested Corridor (MoveLV Congestion Management Process). As development proposals in the Slate Belt area continue, the LVPC urges the continuation of long-term discussions between the Slate Belt 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).
Tractor-Trailer Access and Accommodations
While tractor-trailer parking spaces are proposed, the LVPC strongly recommends providing overnight tractor-trailer parking areas to ‘expand truck parking options and amenities’ (of Policy 2.4), especially in consideration of those that may not be legally allowed to leave the facility due to hours of service limitations or other regulatory requirements, as dictated by state and federal laws. These spaces should include sufficient amenities such as driver facilities and electrification of truck parking stalls to limit tractor-trailer idling for emissions reduction and to support the improvement of air quality. These accommodations keep truck drivers safe and eliminate their need to park on road shoulders and in residential areas, to ‘strengthen freight mobility to minimize quality of life impacts to residents’ (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. The LVPC recommends the installation of a snow-clearing tool at the site that would easily allow for truck drivers to clean off tractor-trailers to help ‘provide a safe, well-maintained transportation network’ (Policy 2.2).

Landscaping and Sustainability
The LVPC commends the comprehensive inclusion of natural landscaping throughout the site, including street trees along proposed Industrial Drive that serve to provide health benefits and ‘improve access to green spaces’ (of Policy 5.3). In addition, enhanced landscaping will support the transition between the development, Blue Mountain and adjacent communities through buffering and support improvement of air quality.

The applicant is encouraged to consider the financial benefits of incorporating sustainable systems into facility functionality. Sustainable utilities, such as geothermal energy systems and greywater reuse for irrigation and plumbing reduce overhead operational costs while also ‘minimizing environmental impacts of development’ (Policy 3.1) and supporting ‘renewable energy and diversification of sources’ (of Policy 3.4). Incorporating sustainable practices into building design and facility operations is a key component of ‘reducing climate change impacts through mitigation and adaptation’ (Policy 3.4) by helping to offset the air quality impacts generated by freight uses and tractor-trailer idling.

Environmental Considerations
The project’s location just south of Blue Mountain, also known as the Kittatinny Ridge, is recognized by the National Audubon Society as an Important Bird Area of Global significance and is the largest continuous forested ridge that remains in Pennsylvania. The LVPC strongly recommends that existing slope and tree cover on the northernmost section of Lot 2 be retained to ‘maximize preservation of woodlands and critical habitats’ (of Policy 3.1). Upward lighting should be avoided to protect disturbing wildlife and migratory patterns. And, every attempt to ensure that the facility attain Dark Sky compliance should be made to ‘maximize the preservation of critical habitats’ (Policy 3.1). A lighting plan should be requested by the municipalities to support this outcome. These recommendations ensure that the development complements the unique history, environment, culture and needs of the Valley (Policy 5.4).
**Stormwater**

The project site is located within the Bushkill Creek Watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments relative to our review of the project’s stormwater management plan are included as Attachment 1.

The LVPC has copied appropriate representatives from the Slate Belt 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, boroughs 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

cc: Thomas Petrucci, Plainfield Township Manager; Sharon Pletchan, Plainfield Township Zoning Officer; Jeffrey Ott, PE, Plainfield Township Engineer; Tina Serfass, Wind Gap Borough Zoning Officer; Robert Collura, PE, Wind Gap Borough Engineer; Robin Zmoda, Pen Argyl Borough Manager; Brian Boyer, PennDOT; Derrick Herrmann, PennDOT; Melissa Maupin, PennDOT; Tina Smith, Northampton County DCED Director; Mark Hartney, Northampton County DCED Deputy Director; Sherry Acevedo, Northampton County Parks and Recreation Conservation Coordinator; Molly Wood, LANTA Planner/Land Use Specialist; CRG Services Management, LLC, Applicant; Matt Chartrand, PE, Bohler Engineering; Brooke Kerzner, Bangor Borough Mayor; Nathaniel Dysard, Bangor Borough Manager; John Couch, East Bangor Borough Council; Jennifer Smethers, Lower Mount Bethel Township Manager; Dan Wilkins, Portland Borough Planning Commission Chair; Domenick DeFranco, Roseto Borough Planning Commission Chair; Cathy Martino, Roseto Borough Manager; Robert Teel, Upper Mount Bethel Township Planning Commission Chair; Ed Nelson, Upper Mount Bethel Manager; Charles Dertinger, Washington Township Planning Commission Chair; Geoff Reese, LVPC Director of Environmental Planning; Paul Carafides, LVPC Director of Transportation Planning and Data
Appendix – Trail Plans and Studies

The Two Rivers Area Greenway Trails Implementation Study - The WG2.2 location on the map below is the same location as the proposed Industrial Drive:
The Northern Tier Trail Feasibility Trail study – a trail alignment is shown along Route 512 (blue on the map below), including a portion of the project property frontage:

The September 11th National Memorial Trail becomes an on-road trail (shown in red on the map below) traveling west and north from the Plainfield Township Trail:
The WalkRollLV: Active Transportation Plan Bicycling Commuting Corridor (solid red on the map below) is along Route 512 from Buss Street to Main Street:

Recommendations for this area as referenced in the above comments include:

- **Map Location A - Shared-Use Path**: Provide a side path along the south side of Route 512 between the Plainfield Township Trail (Buss Street) and George Street in Pen Argyl.
- **Map Location B - Pennsylvania Avenue Bike Lanes**: Provide a bike lane on Pennsylvania Avenue in Pen Argyl Borough, in the westbound direction and shared-lane markings in the eastbound direction.
## Project Review Summary Sheet

**Comprehensive Planning Committee**

<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>South Whitehall Township</td>
<td><em>Motor Vehicle Service Facilities</em> – Amends regulations prohibiting Motor Vehicle Service Facilities within 1,500 feet of each other.</td>
<td>This minor proposal is a matter of local concern and exhibits consistency with <em>FutureLV: The Regional Plan</em>.</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>Freemansburg Borough</td>
<td><em>Various</em> – Amends requirements and standards pertaining to noncommercial swimming pools.</td>
<td>This minor proposal is a matter of local concern and exhibits consistency with <em>FutureLV: The Regional Plan</em>.</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>Moore Township</td>
<td><em>Warehouse Regulations</em> – Amends the definition of warehouse, changes the use from permitted by-right to a conditional use, and introduces regulations and standards for warehouse uses in the Industrial District.</td>
<td>Exhibits consistency with <em>FutureLV</em> – Demonstrates a commitment to municipal consideration of the global effects of new or expanded freight businesses (of Policy 2.4).</td>
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<tr>
<td>Project</td>
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<td>Application to Renew Approval of Existing Wastewater Treatment Plant and Approve Upgrade (DRBC Review)</td>
<td>City of Easton</td>
<td>Application by Easton Area Joint Sewer Authority to renew approval of existing 10.0 million gallon per day wastewater treatment plant and discharge. Proposed upgrade consists of upgrading the facility to improve solids removal. The plant serves the City of Easton, the boroughs of Tatamy, Wilson, West Easton and Glendon, and the townships of Palmer, Forks, Williams, Lower Nazareth and Bethlehem. Stockertown Borough is in the process of connecting. Five-year renewal cycle.</td>
<td>Exhibits consistency with <em>FutureLV: The Regional Plan:</em> Protect the quality and quantity of surface water and groundwater. Per DRBC documentation, no substantial adverse impacts are anticipated with continued operation. In addition, under the permit, DRBC may modify or suspend its approval or any permit condition to mitigate adverse impacts.</td>
</tr>
</tbody>
</table>
July 28, 2021

Becky A. Bradley
Lehigh Valley Planning Commission
961 Marcon Blvd., Suite 310
Allentown, PA  18109

Re:  Final Rulemaking: CO₂ Budget Trading Program (#7-559 / IRRC # 3274)

Dear Becky:

The Department of Environmental Protection (DEP) has completed its preparation of the CO₂ Budget Trading Program final rulemaking (#7-559) (also known as RGGI) and has submitted the rulemaking for review and consideration to the Independent Regulatory Review Commission (IRRC) as well as to the Pennsylvania House and Senate Environmental Resources and Energy Committees.

This final rulemaking is anticipated to be considered by IRRC at its public meeting on Wednesday, September 1, 2021. For additional information on the public meeting, please refer to IRRC’s website at http://www.irrc.state.pa.us/meetings/ or contact IRRC at 717.783.5417.

The rulemaking package is available on IRRC’s webpage for this rulemaking at http://www.irrc.state.pa.us/regulations/RegSrchRslts.cfm?ID=3285. Included in the rulemaking package is a comment and response document, which includes responses from DEP to comments received on the rulemaking during the public comment period.

Please contact me by e-mail at laurgiffin@pa.gov or by telephone at 717.772.3277 if you have any questions concerning the rulemaking or any other regulatory initiative.

Sincerely,

Laura Griffin
Regulatory Coordinator
**Plan Activity**

**Lehigh County**
- Reviewed: 32
- Acres: 141.2

**Northampton County**
- Reviewed: 33
- Acres: 277.5

**Regional Totals**
- 12 Subdivision/Lot Line Adjustments
- 33 Development
- 13 Stormwater Management
- 7 Municipal Ordinances and Maps
- 418.7 Acres

*Includes preliminary and final plans.

**Types of New Development**

**Housing: 356 Total Units**
- Single-Family Detached: 7
- Townhouses: 0
- Apartments: 316
- Planned Residential: 0
- Twins: 4
- Assisted-Living: 0
- Manufactured Homes: 29
- Condos: 0

**Non-Residential: 1,719,390 Total Square Feet**
- Commercial: 51,310
- Retail: 0
- Public/Quasi-Public: 99,070
- Industrial (Warehouse)*: 1,377,379 (W: 1,035,276)
- Office: 0
- Transportation: 0
- Agriculture: 0
- Recreational: 191,631

* Warehouse number is a subset of industrial total square footage.

**Location of Development**

- Plan Activity

**Year to Date**

- Residential Units
- Non-Residential Square Footage

*Plan Details and Previous Reports at lvpc.org/subdivisionreport.html*