LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, September 23, 2021, at 7:00 PM
Via Microsoft Teams
AGENDA


Roll Call

Courtesy of Floor

Chairman’s Report
1. New Commissioner
   a. David Jones
2. New Staff
   a. Brad Stewart, Senior Transportation Planner
   b. Julie Benco, Regional Planner

Minutes
1. ACTION ITEM: Minutes and Review of Roll Call Actions of the August 26, 2021, Commission Meeting (J B)

Comprehensive Planning Committee:

County Planning Review as Municipal Planners
1. DISCUSSION ITEM: PennStro Leasing – Glendon Borough (BB, J S, G R, BS, PC)

County Planning Review as County Planners (FutureLV)
2. ACTION ITEM: Moore Township – Land Use of Regional Significance – Southmoore Business Center (BB)
3. ACTION ITEM: Emmaus Borough – Land Use of Regional Significance – Seven Generations Charter School Building Addition (J S)
4. ACTION ITEM: Coopersburg Borough and Upper Saucon Township – Land Use of Regional Significance – Liberty Bell Elementary School (J S)
5. ACTION ITEM: Hanover Township (LC) – Land Use of Regional Significance – Air Products and Chemicals, Inc. Hangar (PC/BS)
6. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (J S)

Environment Committee:
1. INFORMATION ITEM: 2020 Pennsylvania Forest Action Plan (G R)
Transportation Committee:
  1. Committee Report: Summary

Old Business:
  1. INFORMATION ITEMS: Activity Reports
     a. Monthly Subdivision, Land Development, Stormwater and Municipal
        Ordinance/Plans Report (BB)
     b. Highway Traffic Monitoring (PC)

New Business:
  None.

Executive Director’s Report:
  1. Municipal Outreach and Support Update
     a. Lehigh Valley Government Academy
     b. Multi-Municipal Comprehensive Plans
     c. General Assembly, November 30th at 7 PM, Virtual
     d. Other Requests

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. Lehigh Valley Gala + Awards (MA)
     b. Local Technical Assistance Programs
        a. Analyzing Crash Data at Intersections, Oct. 14, 11 am to noon
        b. Asphalt Roads Common Maintenance Problems, Oct. 19, 8 am to
           noon.
        c. Common Issues in Alleys, November 4, 11am To noon.
     c. Lehigh Valley Government Academy:
        a. Zoning Administration
           1. October 13, 20 & 27 from 5:30 - 9:00 pm

Next Lehigh Valley Planning Commission Meeting:
   Thursday, October 28, 2021, at 7:00 pm
The LVPC held a virtual public meeting on Thursday August 26, 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, Steven Glickman, Michael Harakal, Kent Herman, Rick Molchany, Joyce Moore, Christina Morgan, Owen O’Neil, Kathy Rader, and Kevin Schmidt.

**Northampton County**

Members Absent:

**Lehigh County**

**Northampton County**
Janell Connolly, Robert Donchez, Kevin Lott, Carl Manges, and Lamont McClure.

**Staff Present:** Matt Assad, Becky Bradley, Paul Carafides, Geoff Reese, Jill Seitz and Yvonne Amofah

**Public Present:** Joe, Zak, Shawna L., Lori Stauffer, Kurt Bresswein, Bob Hahn, Terri O’Leary, Derek Haager, Huey Lewis, Elizabeth, Thomas Amidon, Bill Friedmann, Jeff Ward, Heidi von Liebenstein and Beth McCrea

**COURTESY OF THE FLOOR**
Mr. Dougherty shared his sadness over the passing of former LVPC Executive Director Michael Kaiser, stating that Kaiser was a steady hand guiding the Lehigh Valley for more than 45 years. He noted that while most people know how Mr. Kaiser helped get Interstate 78 and Route 33 built, and set a vision for how the region would develop, many may not have known that he fought to protect our environment, working hard to preserve farmland and open space, while expanding the region’s parks and trails network. Several other Commissioners echoed Mr. Dougherty’s sentiments, and offered their condolences to Mr. Kaiser’s family, including his daughter Wendy.
CHAIRMAN’S REPORT
Mr. Zebrowski announces that the LVPC was recently accepted into the Pennsylvania Department of Environmental Protection Local Climate Action Program. The Commission will work with DEP to get technical assistance to create a regional greenhouse gas inventory that will ultimately lead to climate actions that will help mitigate the impacts of climate change on the Lehigh Valley.

MINUTES
Mr. Zebrowski stated that the minutes of the Thursday July 22nd, 2021 LVPC meeting are attached, and he then asked for a motion to approve the minutes. Mr. McGee made a motion to approve the minutes. Mr. Melnick seconded the motion. The motion passed with Ms. Rader abstaining.

COMMITTEE REPORTS
Comprehensive Planning Committee

ACTION ITEM: Lehigh Valley Trade Center III – Land Use of Regional Significance – Lower Nazareth Township and Bethlehem Township
Ms. Seitz reviewed a Land Use of Regional Significance in Lower Nazareth Township and Bethlehem Township proposing to construct two warehouses (295,750 and 299,795 square feet) on the site of the Dutch Springs water park. While the proposal generally exhibits consistency with the General Land Use Plan Map because as it is located in an area designated for Development, 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. The traffic impacts of this development, in conjunction with existing and approved freight-based businesses along the Hanoverville Road and Route 191 corridor, must be assessed in consideration of the entire regional transportation system (of Policy 2.4). A weight-restricted bridge on Hanoverville Road poses issues for both truck and transit accessibility to the site and is a critical issue that must be addressed immediately. 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).

Commission members vocalized issues with the development proposal from air quality to transportation system impacts and from loss of a privately-help recreational facility to limited municipal controls because of an aged-Pennsylvania Municipalities Planning Code. Several members of the public also shared concerns regarding the loss of the recreational facility.

No questions were asked of Ms. Seitz. Mr. Zebrowski asked the Commission to make a motion to accept the staff comments. Mr. Molchany made the motion, Mr. Dougherty seconded the motion. Motion passed with Ms. Davis abstaining.

ACTION ITEM: Good Shepherd Rehabilitation Hospital – Land Use of Regional Significance – Upper Saucon Township
Ms. Bradley reviewed a Land Use of Regional Significance in Upper Saucon Township proposing to construct a 123,923-square-foot rehabilitation hospital, a relocation of the existing facility in the City of Allentown. Ms. Bradley states that the proposal generally exhibits consistency with FutureLV because it is in the Development area of the General Land Use Plan, and in this area there is growing development interest and access to appropriate transportation and utility infrastructure. However, 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. Sidewalks, landscaping and a bus shelter were commended. Mr. Zebrowski called for a motion to accept staff comments. A motion was made by Mr. Melnick and seconded by Mr. Harakal and carried with no abstentions.

ACTION ITEM: 905 Pennsylvania Avenue – Land Use of Regional Significance – Plainfield Township and Wind Gap Borough
Ms. Seitz reviewed a Land Use of Regional Significance in Plainfield Township and Wind Gap Borough proposing to construct two warehouses (786,000 and 308,000 square feet) and a 19,520-square-foot office and shop. The project has the potential to exhibit consistency with FutureLV if the appropriate
considerations are applied to mitigate the potential impacts on the community: roadways in the vicinity are not built to withstand the heavy vehicular traffic the development will generate and freight routes will need to be designated, for example. The proposal’s consistency with FutureLV can be improved by providing pedestrian and transit infrastructure that would facilitate connections to nearby trails. However, vehicles traveling to and from the site will most likely travel through Wind Gap Borough via South Broadway (Route 512). 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).

Mr. Zebrowski asked the Commission to make a motion to accept staff comments. Mr. Harakal made the motion, seconded by Mr. O’Connell and the motion passed with no abstentions.

**ACTION ITEM: Comprehensive Planning Committee Summary Sheet**
Mr. Melnick presented the August Comprehensive Committee items with staff presenting information. Ms. Seitz provided highlights of a Moore Township zoning ordinance amendment that proposes numerous requirements and standards for warehouse developments.

Mr. Zebrowski called for a motion to accept the staffs’ comments. Mr. Molchany made the motion, seconded by Ms. Heller. Motion passed with Ms. Morgan abstaining on the South Whitehall item.

**Environment Committee:**

**ACTION ITEM: Environment Committee Summary Sheet**
Ms. Dreisbach stated that the Environment Committee Summary Sheet is in the packet for review. Mr. Zebrowski called for a motion to accept the staff comments. Ms. Dreisbach made the motion, seconded by Ms. Pearson. The motion carried with no abstentions.

**INFORMATION ITEM: Regional Greenhouse Gas Initiative Final Rulemaking**
Mr. Reese told the commission that the purpose of the 10-state Regional Greenhouse Gas Initiative (RGGI) is to cap the CO2 emissions from PA electric sector producers, reduce the cap over time, sell allowances for CO2 emissions to producers and reinvest the proceeds for the elimination of air pollution. He stated the goal is to reduce CO2 emissions by 26% by 2025 and by 80% by 2050. He explained that Environmental Quality Board (EQB) adopted the final regulation on July 13, 2021. He said the final-form regulation will take effect immediately upon publication in the Pennsylvania Bulletin, with an intent to initiative begin in 2022. Mr. Zebrowski asks for any questions or comments. There were none.

**Transportation Committee:**

**INFORMATION ITEM: Infrastructure Funding Potential**
Mr. Carafides presented information on the Senate’s Federal Infrastructure Bill that includes $550 billion in new investments future over five years. The Bill was passed by the Senate on Tuesday August 10th and will go to the House for approval on or around September 20th. Mr. Zebrowski asked for any questions or comments. There were none.

**Old Business:**

**INFORMATION ITEMS: Activity Reports**

*Monthly Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report*
Ms. Bradley presented plan and review activity for July, which included 12 Subdivisions, 33 Development proposals, 13 reviews for Stormwater Management, and 7 Municipal Ordinances and Maps for a total of 65 reviews. Mr. Zebrowski asked for questions hearing none, the agenda progressed.
Highway Traffic Monitoring
Mr. Carafides presented the Highway Traffic Monitoring report for July. Vehicular traffic counts were near the highest levels on three of our four continuous counters since even before the COVID-19 pandemic began. At this point traffic seems to have found its new normal as numbers have stayed steady over the last few months.

Truck traffic tells the story of our economy and the needs created by the change in e-commerce during the pandemic. Truck traffic counts on Interstate 78 are on par with the past few months in these “new normal” times. When factoring the growth of trucks into the vehicular traffic counts, passenger vehicles on I-78 and Route 33 may be back to the old normal, but the increase of trucks is what has increased the overall average daily trips. These counts are the new reality for the region. LVPC will continue to collect the data and do a monthly analysis to better plan for our future investments into the transportation system. Mr. Zebrowski asked for questions or comments. No questions were asked.

New Business:

INFORMATION ITEM: 8th Annual LVPC Gala and Awards, October 12, 5:30 PM, Virtual
Mr. Assad announced that the 8th Annual Gala + Awards was scheduled for 5:30 pm, October 12, and it will again be virtual. He explained that it would once again be about an hour-long video, but this year would include a 30-minute panel discussion where experts will talk about how the pandemic has changed us, and where we’re headed in the future. He then asked everyone to fill out a five question survey that would help in planning the Gala, and asked everyone to stay tuned for tickets becoming available at lvpc.org. Mr. Zebrowski asked if anyone had any questions? No questions asked.

Executive Director’s Report
None.

Communications:

INFORMATION ITEM: Business Cycle Column
Mr. Assad summarized the most recent Morning Call Business Cycle column, due to hit the internet the next day and the Sunday paper Aug. 29. Her explained that in the column, Becky wrote about our BuildLV Mid-Year Report, which details a very busy first half of the development year in which we’ve reviewed more homes than we’ve seen in more than a decade and twice the amount of industrial development than we saw by last year at this time. He stated that the next column was scheduled to publish October 10. Mr. Assad went on to remind everyone to support Riverside Drive project and the LVPC’s application for a $23 million grant by going to raiseriversidedrive.com and hitting the support tab at the top of the page. Mr. Zebrowski asked if anyone had any questions? No questions were asked.

INFORMATION ITEM: Plan Lehigh Valley radio show on WDIY NPR 88.1FM
Mr. Assad summarized the most recent Plan Lehigh Valley 30-minute radio show, hosted by Becky and Mr. Assad, which detailed the BuildLV: Mid-Year development report, and the busy first six months of home and industrial development proposals. He explained the next show would include guests, developers J.B. Reilly and Mark Mulligan, talking about reuse and redevelopment projects in Allentown and Easton. He stated that show was scheduled to air at 6:30 pm, September 6, and that all past shows are streaming at wdit.org. Mr. Zebrowski asked if anyone had any questions? No questions were asked.

Public Engagement
INFORMATION ITEM:
Mr. Assad announced that the Local Technical Assistance Program had a full schedule of virtual classes right into September, beginning Aug. 31 with its Roadside Vegetation Control class and continuing with about one virtual class per week. He explained that the classes are free and anyone can still sign up at
lvpc.org/ltap, or by calling Brian Hite.

Mr. Assad then announced that the Lehigh Valley Government Academy will restart in September. He said these will be our first in-person training of the year, and because of the need for social distancing, will be a max of 18 students. The two classes scheduled are Community Planning on three consecutive Mondays, September 13, 20 and 27, and Zoning Administration on three consecutive Wednesdays October 13, 20 and 27. All the classes tend to run from 5:30 pm to 9 pm, each evening. Anyone can sign up online at LVPC.ORG. Mr. Zebrowski asked if anyone had any questions? No questions were asked.

ADJOURNMENT:
Mr. Zebrowski stated that the next LVPC meeting is set to be virtual on September 23. Mr. Zebrowski then asked if there was a motion to adjourn the meeting and Mr. Molchany loudly made a motion to adjourn. Mr. Melnick seconded the motion. The meeting was adjourned.

Submitted by:
Becky Bradley, AICP, Executive Director
September 24, 2021

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

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

Dear Mr. Becker:

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 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 (Policy 4.6).

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 (Policy 4.2).

All-in-all, the Commission doubts the proposal ‘promotes the fiscal health and sustainability of the municipality’ (Policy 4.6). Beyond concern for the economically viability to the community in this largely rural location, the development and poses a risk to the region’s workforce, transportation system, quality of life and environment (Policy 4.6). 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 multimunicipal comprehensive plan (Policy 4.6). 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:

**Existing Land Uses**
The project as proposed does not take into account the development existing around the site. Multiple existing residential properties will be significantly affected by this development. The probability that residential property values nearby will be adversely affected is almost certain. Creating a ‘local balance between housing and jobs’ (Policy 4.5) is a central tenant of FutureLV: The Regional Plan, as well as, the Nazareth
Area...2030 Multimunicipal Comprehensive Plan, policies to “protect neighborhoods and housing areas from adverse impacts” and “protect existing investments in housing” (Housing, pg. 97). The Township’s adopted comprehensive plan also recognizes that “housing and neighborhoods...are central in their importance. They will decline unless properly protected” (Housing, pg. 96). The local plan further cites, “noise from passing trucks and vehicles, glare and light from nearby businesses, air pollution from industrial operations, visual blight from structures out of scale with the area” as specified reasons to separate “incompatible uses from residential areas” (Housing, pg. 96-97). Both the regional plan and municipal comprehensive plan policies indicate the inappropriate location for this type of development but, also the need for significant impact mitigation from buffering to traffic that will need to occur should the development move forward.

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 efficiently and at a reasonable cost compared to wages 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 Burean 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
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
  - September 21, 2021 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

- LVPC Full Commission Meeting
  - September 23, 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 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/Emmaus 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](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, Alburtis 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

Mr. Dennis Balascak, Council President
Borough of Coopersburg
5 North Main Street
Coopersburg, Pennsylvania 18036

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

RE: Liberty Bell Elementary School – Land Use of Regional Significance
Borough of Coopersburg and Upper Saucon Township
Lehigh County

Dear Mr. Balascak and Ms. Ciotti Falcone:

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
  - 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 as an educational facility. The project, located at 960 West Oxford Street, proposes to construct four separate building additions to an existing elementary school totaling 12,462 square feet and a soft play area (parcel number 64239101517, 64239531132 and 642328566894). This proposal generally exhibits consistency with FutureLV because the expansion of the existing school 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 LVPC commends the included sidewalk extensions and improvements within the parking area that connect the building to the external sidewalk network and ‘promote safe routes to schools and playgrounds’ (of Policy 5.2).
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 runoff for greywater reuse, and renewable energy sources such as solar or geothermal. 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.

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.

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.

The LVPC has copied appropriate representatives from adjacent municipalities to further ‘coordinate land use decisions across municipal boundaries’ (of Policy 1.4).

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

Sincerely,

Jillian Seitz
Senior Community Planner

cc: Timothy Paashaus, Manager, Borough of Coopersburg
    William Erdman, Engineer, Borough of Coopersburg
    Thomas Beil, Upper Saucon Township Manager
    Patricia Lang, Upper Saucon Township Director of Community Development
    Charles Unangst, Upper Saucon Township Engineer
    Todd Bergey, Southern Lehigh School District, Applicant
    Scott Peter McMackin, PE, Cowan Associates, Inc.
    Leslie Huhn, Lower Saucon Township Manager
    Brian Miller, Upper Milford Township Planning Coordinator
    Emily Fucci, Lower Milford Township Zoning Officer/Planning Administrator
    Kerry Rabold, Salisbury Township Planning & Zoning Officer
    Garrett Cook, Lehigh County Conservation District Engineer
    Geoff Reese, LVPC Director of Environmental Planning
September 24, 2021

Mr. Mark Thomas, Chair
Hanover Township Planning Commission
2202 Grove Road
Allentown, PA 18109

RE: Air Products and Chemicals, Inc. Hangar – Land Use of Regional Significance
Hanover Township
Lehigh County

Dear Mr. Thomas:

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
  - 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 Airports – All category. The subject application proposes to construct a 36,000 square foot hangar, an office building and a service facility on the northeast corner of the Lehigh Valley International Airport. The project is located at 3395 Airport Rd. This proposal generally exhibits consistency with FutureLV: The Regional Plan because it is located in the Development area of the General Land Use Plan and serves to ‘provide a safe, well-maintained transportation network to move people and goods efficiently, while capitalizing on existing infrastructure’ (of Policy 2.2). The LVPC commends the proposal because it supports interregional transportation services (of Policy 2.2) and the expansion of local business operations that diversify the regional economy and strengthen economic resilience (of Policy 4.2).

The LVPC offers the following additional comments:

**Transportation Considerations**

This infill project involves the removal of a garage, a trailer and other associated features on the northeast corner of the 792.45-acre Lehigh Valley International Airport lot. The plan also involves the construction of a 36,000 sf hangar, an office building and a service facility.
The crash history for the Lehigh Valley International Airport main entrance at Airport Road/Postal Road intersection has steadily decreased over the last five years. However in 2020, five non-fatal car accidents occurred at the intersection which still qualifies as a level of concern under PennDOT standards.

The LVPC commends the proposed Fire Truck/Emergency Services turn plan through the internal site of the project to ‘enhance incident management strategies’ (of Policy 2.2).

The site location will be fully fenced in with a swing access gate and the hangar will be used for smaller planes which will have little to no impact to the current traffic patterns in the adjacent Airport Road corridor.

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(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.

The LVPC has copied appropriate representatives from the River Central Multi-Municipal Comprehensive Plan partner agencies to ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4).

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,

Paul Carafides
Director of Transportation Planning and Data

cc: Melissa Wehr, Manager, Hanover Township; Al Kortze, PE, Keystone Consulting Engineers Inc.; Bethany Buck, Air Products and Chemicals Inc.; Fidel Gonzalez, Langan Engineering; Steve Travers, Catasauqua Borough Manager; Brent Green, Manager, East Allen Township; Peter Paone, President, North Catasauqua Borough Council; LeRoy E. Brobst, Manager, Northampton Borough
<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
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<tr>
<td>Subdivision and Land Development Ordinance Amendment</td>
<td>North Whitehall Township</td>
<td>Submission Requirements – Adds a requirement for applicants to notify surrounding property owners of the submission of subdivision and land development proposals in written form.</td>
<td>Exhibits consistency with <em>FutureLV: The Regional Plan</em> - the LVPC recognizes the Township’s continued effort to ‘facilitate discussion among residents’ and members of the community (of Policy 1.4).</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>South Whitehall Township</td>
<td>No-Impact and Low-Impact Home-Bakes Businesses – Amends the current standards for no-impact home-based businesses and creates a new section and standards for low-impact home-based businesses.</td>
<td>Exhibits consistency with <em>FutureLV: The Regional Plan</em> – the amendments serve as best practices in ‘diversifying the regional economy to strengthen economic resilience’ (Policy 4.2).</td>
</tr>
<tr>
<td>Zoning Ordinance and Subdivision and Land Development Ordinance Amendment</td>
<td>Allen Township</td>
<td>Mixed-Use Village Design Standards – Adds ‘Mixed-Use Village’ as a use and amends design standards in the R1 Zoning District.</td>
<td>The theory behind these amendments generally exhibits consistency with <em>FutureLV: The Regional Plan</em>, however the execution of the amendments does not. The LVPC is concerned that the Township, in an admirable attempt to address the needs of the growing residential population, may be creating an indefensible legal issue, through spot zoning, as the new “mixed-use village” is applicable to only one property.</td>
</tr>
</tbody>
</table>
Plan Activity

Lehigh County

- Reviews: 35
- Acres: 119.5

Northampton County

- Reviews: 33
- Acres: 367.01

Regional Totals*

- Subdivision/Lot Line Adjustments: 23
- Development: 29
- Stormwater Management: 13
- Municipal Ordinances and Maps: 3

Total: 486.51 Acres

* Includes preliminary and final plans

Types of New Development

Housing: 783 Total Units

- Single-Family Detached: 60
- Townhouses: 154
- Apartments: 557
- Planned Residential: 0

- Twins: 12
- Assisted-Living: 0
- Manufactured Homes: 0
- Condos: 0

Non-Residential: 1,327,482 Total Square Feet

- Commercial: 42,043
- Retail: 7,531
- Public/Quasi-Public: 164,388
- Industrial (Warehouse)*: I: 1,094,000 (W: 1,094,000)

- Office: 19,520
- Transportation: 0
- Agriculture: 0
- Recreational: 0

* 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
State Route 33 between Newburg Road and State Route 248 (Northampton County)

Interstate-78 just east of the State Route 309 exit
(Northampton County)

Interstate-78 just east of State Route 33 exit
(Northampton County)

State Route 309 just south of State Route 378
(Lehigh County)

TOTAL VEHICLE TRAFFIC

* August 4 was impacted by Hurricane Isaias

** February 2 was impacted by Winter Storm Orlena
Not a week passes when I don’t hear someone say “Why can’t you stop all this development going on? It’s killing our region.”

Let me first say, it’s not killing, but changing, our beautiful region, and controlling it with a balanced approach is going to be key in the coming years. Secondly, we don’t have the power to build moats and fill them with piranhas to keep people, their vehicles and their online shopping deliveries out. And our municipal partners don’t have the power to turn away developers who follow the rules.

Like it or not, Pennsylvania is a right-to-develop state, which means every municipality has to accommodate every type of development — including warehouses — and municipalities can’t deny developers who comply with the zoning that’s in place. Those realities came to mind as I reviewed this region’s development for the first half of 2021.

The best way to describe our BuildLV Mid-Year Report is more. More housing proposals than we’ve seen since before the Great Recession. More industrial developers who want to build here and more plans overall than we’ve seen in a decade. And within the numbers there are reasons to be encouraged — and concerned.

Let’s start with housing. The 2,545 homes that were reviewed from January through June are the most we’ve seen in a very long time, and 500 more than we had by this time during a very busy 2020 — yes, developers kept filing plans right through the COVID-19 pandemic. While not everyone is anxious to see more homes built here, the fact is, this is a good thing. Our housing market is overheated right now because we have a monumental housing shortage. Relief for skyrocketing prices and frustrated homebuyers won’t come until we have a lot more homes to handle a population that has been growing by roughly 4,000 people a year since a little after World War II.
We’re at the head of another housing boom, much the way we were in the 1980s and 2000, but this one is very different. In those times, as people from New York, New Jersey, and all over really, flooded into the Lehigh Valley to take advantage of our quality of life, they were moving into large single-family detached homes, often on large one- or two-acre lots. It gave rise to the less-than-flattering term “McMansion”. In some years, those single-family homes accounted for 60% of all new builds. As a result, there were years during that last boom when more than 2,000 acres of mostly green space were used for new homes.

This latest period of housing is far more diverse. While the single-family home remains a staple here, with 932 units reviewed by mid-year, it makes up just more than one-third of the homes reviewed. The most common type now is apartments, at 1,122 units in the first six months, followed by 413 townhomes, 58 twins and 20 condominiums. That diversity not only allows for more options, and potentially more attainability for buyers and renters, but it uses less land per unit, giving us a better chance of striking that balance we value. Accommodate growth, while preserving our character and beauty.

On the non-residential side of the ledger, despite all the national headlines about a steep decline in office, commercial and retail development, we reviewed almost 433,000 square feet of commercial, nearly 152,000 square feet of office, 148,499 square feet of public/quasi-public, and 33,863 square feet of retail space. We even had 115,623 square feet of transportation development, and while that number doesn’t rival those giant industrial numbers we’re always talking about, it involves some interesting stuff. It includes portions of an exciting Riverside Drive road and commuter trail project through Allentown to Whitehall Township, a proposal for a new paratransit facility for LANTA, improvements at the security checkpoints at Lehigh Valley International Airport, and new parking garages in Allentown and Bethlehem. By and large, these types of proposals will add key services that support the growing population, while enhancing our transportation system and business climate.

We also reviewed 6.1 million square feet of industrial in the first half of the year, and it will surprise no one that nearly 90% of it was for warehouse and distribution centers. That’s double what we saw in the first half of last year, but if there’s one encouraging aspect of this, it’s that the municipal reviewers who ultimately make the decisions on these are putting them under much greater scrutiny. In a few cases, they’ve outright denied proposals that don’t match the zoning, the way Upper Macungie Township Supervisors did with a high cube warehouse proposal last year.

In others that comply with local zoning — and can’t be denied by municipal leaders — our LVPC planners have given municipalities the playbook on how to make these giant buildings fit better into the community, be more green and manage traffic impacts to the greatest extent the ancient Pennsylvania law that governs land development allows. If
we have to accept it, let’s at least make it as good as possible by minimizing negative impacts. This strategy has resulted in more walkable facilities with sidewalks and transit stops, truck parking accommodations that keep the tractor-trailers from idling on our exits ramps and road shoulders, truck routes designed to keep them off our neighborhood streets, and green infrastructure that make the developments more attractive and better able to handle stormwater runoff.

One thing that’s clear from the first half of 2021 is that development is not slowing. And while we’ve all had those moments when we wish we could just pull up the drawbridge, overstock the moat with piranha, alligators and hungry hippos to make it all stop, our best weapon is a commitment to utilizing every land use tool available and collaborating at all levels of government to ensure developers understand community priorities and respect them.

_Becky Bradley is Executive Director of the Lehigh Valley Planning Commission_