LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, April 28, 2022, at 7:00 PM
Via Microsoft Teams
AGENDA

THE MEETING CAN BE ACCESSED AT https://tinyurl.com/FC2022mtgs OR VIA PHONE 610-477-5793, Conf ID: 793 745 456#

Roll Call

Courtesy of Floor

Chairman’s Report

1. Welcome new LVPC Commissioner
   a. Edward Nelson, Northampton County
2. Welcome New LVPC Team Members
   a. Bambi Griffin Rivera, Community and Regional Planner
   b. Steve Neratko, Chief Community and Regional Planner
3. Honoring 42 Years of Service and Leadership
   a. Geoff Reese, PE, Director of Environmental Planning

Minutes

1. ACTION ITEM: Minutes and Review of Roll Call Actions of the March 24, 2022, Commission Meeting (JB)

Comprehensive Planning Committee:

1. ACTION ITEM: Upper Macungie Township – Land Use of Regional Significance - Air Products Campus Redevelopment (JB)
2. ACTION ITEM: Lowhill Township – Land Use of Regional Significance - 2951 Betz Court Warehouse (SN)
3. ACTION ITEM: Lowhill and Weisenberg Townships – Land Use of Regional Significance - 2766 Route 100 Warehouse (SN)
4. ACTION ITEM: Palmer Township – Land Use of Regional Significance - Carson Lot 100/200 (BGR)
5. ACTION ITEM: City of Bethlehem, Lehigh County – Land Use of Regional Significance - Lehigh Valley Academy Regional Charter School (New LVA Campus) (JB)
6. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (BGR)

Environment Committee:
1. ACTION ITEM: Environment Committee Summary Sheet (GR)

Transportation Committee:
1. INFORMATION ITEM: Draft 2023-2026 Transportation Improvement Program Public Comment Period (PC)
   a. May 2, 6:30 pm, WDIY 88.1 FM Plan Lehigh Valley Radio Show
   b. May 11, 8:00 am, Public Participation Meeting, virtual meeting
   c. May 16, 9:30 am, LA Mega 101.7 FM Radio Show
   d. May 17, 4 pm, Public Participation Meeting, virtual meeting
   e. May 18, 9:00 am, LVTS Technical Committee Meeting, virtual meeting
   f. May 19, 7:00 pm, Public Participation Meeting, Fowler Center, 511 E. Third Street, Bethlehem, PA 18015

Old Business:
1. INFORMATION ITEMS: Activity Reports:
   b. Quarterly Subdivision and Land Development Report (BB, SN)
   c. Highway Traffic Monitoring (PC)

New Business:
1. INFORMATION ITEM: LVPC Commissioner Retreat, May 20th, 12-2pm, LVPC, 961 Marcon Blvd, Suite 310, Allentown, PA (SG)

Communications and Public Engagement:
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)
   a. April 4 - BUILDLV: Non-Residential, with Paul Carafides
   b. Next show – May 2: Draft TIP Public Engagement and Comment
3. INFORMATION ITEM: 2022 Lehigh Valley Government Academy (MA)
   a. Subdivision and Land Development – Tuesdays, May 3, 10, 17
   b. Community Planning – Wednesdays, September 7, 14, 21
   c. Zoning – Thursdays, October 6, 13, 20
4. INFORMATION ITEM: Local Technical Assistance Programs (MA)
   b. May 10, 8 am to 11 am – Roadside Vegetation Control
   c. May 19, 8 am to noon – Temporary Traffic Control
   d. June 2, 11 am to noon – Bicycle Lane Operational Experiences: “Are We Coasting Smoothly or Pedaling Uphill?”
Register for classes on the LTAP website gis.penndot.gov/ltap/ call 800-FO-R-LTAP or call Brian Hite at 610-264-4544.

5. INFORMATION ITEM: Transformative Talks
   a. February 1 - Coordinated Zoning Across a Region - Video at lvpc.org
   b. August 9, 12 PM - Navigating Today’s Zoning Law
   c. October 11, 12 PM - Act 209 - Transportation Impact Fees

   **Next Lehigh Valley Planning Commission Meeting:**
   Thursday, May 26, 2022, at 7:00 pm
The LVPC held a virtual public meeting on Thursday, March 24, 2022. The meeting was advertised in the Lehigh Valley Press on Wednesday, January 5th, 2022.

Mr. Glickman chaired the meeting.

Ms. Benco took Roll Call.

Members in Attendance:

**Lehigh County**
Geoff Brace, Percy Dougherty, Steven Glickman, Kent Herman, Dennis Klusaritz, Rick Molchany, Joyce Moore, Christina Morgan, Owen O’Neil, Kathy Rader, Stephen Repasch and Kevin Schmidt.

**Northampton County**
Christopher Amato, Jessica Cope, Liesel Dreisbach, Andrew Elliott, Charles Elliott, Dan Engle, John Gallagher, Darlene Heller, Susan Lawless, Carl Manges, William McGee, John McGorry, Scott Minnich, Grace Smith, Tina Smith, Gerald Yob and Tara Zrinski.

Members Absent:

**Lehigh County**
Phillips Armstrong, Bob Elbich, Michael Harakal, Jamie Johnson, David Jones, Joshua Siegel, Matthew Tuerk and Irene Woodward.

**Northampton County**
Lamont McClure, Stephen Melnick, Salvatore Panto and William Reynolds.

Staff Present: Julie Benco, Becky Bradley, Paul Carafides, Hannah Milagio, Sue Rockwell, Dean Severson and Jill Seitz.


COURTESY OF THE FLOOR
Mr. Amato shared sentiments regarding development and *FutureLV: The Regional Plan*.

CHAIRMAN’S REPORT
Mr. Glickman welcomed the newest members of the Lehigh Valley Planning Commission staff, Hannah Milagio and Dean Severson. Ms. Milagio, Program Associate for Community Engagement, introduced herself and described her previous professional experience. Mr. Severson, Director of Regional Planning, also introduced himself and summarized his work in planning. Next, Mr. Asteak reminded the Commission of their role in reviewing Land Uses of Regional Significance, in which their comments should be professional, objective and constructive.
MINUTES
Mr. Glickman stated that the minutes of the Thursday, February 24th, 2022 LVPC meeting are attached, and he then asked for a motion to approve the minutes. Mr. Molchany made a motion to approve the minutes. Ms. Morgan seconded the motion. The motion passed, with Ms. Lawless and Ms. Cope abstaining.

COMMITTEE REPORTS

Environment Committee:

INFORMATION ITEM: Environment Committee Summary Sheet
Mr. Repasch presented the Environment Committee Summary Sheet and noted that Ms. Rockwell could answer any questions. Mr. Glickman called for a motion to accept the staff comments on the summary sheet. Mr. Repasch made the motion; Ms. Moore seconded the motion. Mr. Amato asked about abstaining from motions and Mr. Glickman responded. Motion passed, with Ms. Rader abstaining.

Comprehensive Planning Committee:

ACTION ITEM: Upper Mount Bethel Township – Land Use of Regional Significance – RPL Subdivision & Roadway Infrastructure
Ms. Seitz provided an overview of the project, which proposes the reconfiguration and subdivision of 25 lots totaling 804 acres of land, to create 12 individual building lots ranging in size from nine acres to 158 acres, four open space areas, an onsite walking trail and the development of internal roadways throughout the site. Ms. Seitz explained that a portion of the site is in the Preservation Buffer area of General Land Use Plan and may be able to accommodate development if the necessary transportation and utility infrastructure is available or planned to accommodate the scale of future development. Ms. Seitz highlighted comments related to the lot sizes, landscaping, multimodal transportation, the proposed River Pointe Drive and the proposed onsite walking trail. She outlined additional considerations regarding large-scale development impacts such as, the rail overpass over River Road, Interstate 80 access, environmental impacts and stormwater. Mr. Glickman called for a motion to accept the staff comments. Mr. Dougherty made the motion; Ms. Moore seconded the motion. Mr. McGorry commented on the project. Mr. Molchany commented and asked questions regarding truck amenities, the rail overpass, greenfield development, any remediation efforts, any tax incentives involved and the public sewer opportunities. Ms. Seitz and Ms. Bradley responded. Ms. Bradley also reminded the Commission that this review was solely in regard to the subdivision and roadway infrastructure of the project. Mr. McGorry commented on the project and Mr. Glickman, Ms. Bradley and Mr. Molchany responded. Mr. Amato asked about the staff comment regarding lot sizes and emphasized issues surrounding air pollution. Mr. Glickman asked for any questions or comments from the public. Mr. Cole, a resident of Upper Mount Bethel Township, thanked the staff for their letter and commented regarding truck traffic and environmental impacts. Ms. Henckel also thanked the staff for their review and commented on farmland preservation and the overall project. Mr. Guest, a resident of Lower Mount Bethel Township, emphasized the impacts the project will have on surrounding municipalities and areas. Mr. Wilford Hunt, a resident of Upper Mount Bethel Township, asked about the zoning for certain parcels and commented on the combination of the preliminary and final review, as well as development on a greenfield. Ms. Visicaro commented on the air pollution and truck traffic near her residence. Mr. Stine, of the Delaware Riverkeeper Network, thanked the Commission for their review letters and mentioned the impact of this project on the viewshed and natural area. Mr. Bermingham, a resident of Upper Mount Bethel Township, thanked the LVPC for their recommendations and discussed increases in truck traffic. Mr. Amato added a comment regarding funding and greenfield development. Motion passed, with Mr. Minnich abstaining.

ACTION ITEM: City of Easton – Land Use of Regional Significance – The Confluence
Mr. Severson provided an overview of the project, which proposes the construction of a seven-floor, mixed-use apartment building consisting of a basement parking garage, apartment units, condominium units, retail space and commercial space. Mr. Severson offered several comments regarding multimodal transportation, landscaping and floodplain analysis. Mr. Glickman called for a motion to accept the staff
comments. Ms. Dreisbach made the motion; Mr. Molchany seconded the motion. Mr. Glickman asked for any comments or questions and commented on the landscaping around the property. Motion passed.

**ACTION ITEM: Comprehensive Planning Committee Summary Sheet**

Mr. Glickman presented the Comprehensive Planning Committee Summary Sheet. Mr. Glickman called for a motion to accept the staff comments on the summary sheet. Ms. Dreisbach made the motion; Mr. McGee seconded the motion. Motion passed, with Ms. Rader abstaining.

**Joint Comprehensive Planning and Transportation Committees:**

**ACTION ITEM: Hanover Township, Lehigh County – Land Use of Regional Significance - LVIA - Runway 6-24 Rehabilitation Program**

Mr. Carafides provided an overview of the project, which proposes improvements to the existing runway 6/24 and associated taxiways within the Lehigh Valley International Airport facility. Mr. Carafides noted that the 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. Mr. Glickman called for a motion to accept the staff comments. Mr. Herman made the motion; Ms. Lawless seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

**ACTION ITEM: Forks Township Land Use Assessment Review, as part of Township Act 209**

Mr. Carafides provided an overview of the Act 209 Land Use Assessment Review in Forks Township, which provides the basis for the preparation of a transportation impact fee program. Mr. Carafides highlighted several comments on the report. Mr. Glickman called for a motion to accept the staff comments. Mr. Herman made the motion; Mr. Molchany seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

**Transportation Committee:**

**ACTION ITEMS: Street Vacation – Pine Street from North Front Street to the East, City of Allentown**

Mr. Carafides presented the proposed street vacation petition for Pine Street from North Front Street to the East in the City of Allentown. Mr. Carafides recommended that, if the petition is granted, the City of Allentown and the petitioner provide continued access from North Front Street to the parking lot to provide continued access to utility companies and visitors. Mr. Glickman called for a motion to accept the staff comments. Mr. Herman made the motion; Ms. Moore seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

**Old Business:**

**INFORMATION ITEMS: Activity Reports**

**Monthly Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report**

Ms. Bradley presented plan and review activity for February, which included 13 Subdivisions, 22 Development proposals, 14 reviews for Stormwater Management, and four Municipal Ordinances and Maps for a total of 53 reviews. The reviews included 111 housing units and 1,135,502 square feet of non-residential development. Mr. Glickman asked about the distinction between apartments and condominiums. Mr. Molchany commented on the need for housing in the Lehigh Valley. Ms. Bradley commented on the housing trends and issues in the region. Mr. Molchany asked about the data available on warehousing in the region and Ms. Bradley responded.

**Highway Traffic Monitoring**

Mr. Carafides provided the details of the February traffic counts with overall traffic almost back to the levels of where the reporting began in March 2020. Interstate 78 east of 309 closed out February with 21,136 trucks, an increase of 2,129 trucks from the beginning of March 2020. This increase of trucks...
shows the impacts of industrial development as well as the shift to e-commerce purchases. February’s traffic report looked a little different than the past reports due to the counter on Interstate 78 east of Route 33 being temporarily deactivated because of an equipment issue. Mr. Glickman asked for any comments or questions. There were none.

New Business:

**INFORMATION ITEM: LVPC Commissioner Retreat**
Mr. Glickman announced that a new Doodle Poll was being sent out for the LVPC Commission Retreat, in which the Commissioners and Staff will go over key documents and rolls of the Commission. The last poll did not have enough consensus so a new date will be chosen in May.

Communications and Public Engagement:

**INFORMATION ITEM: Business Cycle Column**
Ms. Milagio summarized the next Business Cycle column that was scheduled to run in the Sunday, March 26th Morning Call. In the column, Becky Bradley uses the 2021 BuildLV Annual Development Report numbers to show the busiest housing development year since 2007 and provides good context for the monumental housing shortage we’re in.

**INFORMATION ITEM: Plan Lehigh Valley radio show on WDIY NPR 88.1FM**
Ms. Milagio summarized the most recent Plan Lehigh Valley 30-minute radio show which took a deep dive into our overheated housing market. LVPC Senior Community Planner, Jill Seitz, joined Becky Bradley and Matt Assad in discussing the housing shortage that got us here and what’s happening right now to get us out of this. Ms. Milagio informed that the 30-minute show is currently streaming at WDIY.org. She stated that the next show was scheduled to air at 6:30 pm, April 4 and will be about the non-residential side of the BuildLV Development report.

**INFORMATION ITEM: Grant Opportunities**
Ms. Milagio alerted the Commission to grant opportunities available, consisting of Northampton County Livable Landscapes grants, WalkWorks grants and Pennsylvania Department of Community and Economic Development Multimodal grants.

**INFORMATION ITEM: 2022 Lehigh Valley Government Academy**
Ms. Milagio reminded the Commission that the Lehigh Valley Government Academy Classes are back in 2022, including Zoning Administration on April 4, 11 & 18, Subdivision and Land Development on May 3, 10 & 17, Community Planning on September 7, 14 & 21 and Zoning on October 6, 13 & 20. Anyone can sign up online at lvpc.org/lvga.

**INFORMATION ITEM: Local Technical Assistance Program**
Ms. Milagio announced that the Local Technical Assistance Program has a full schedule of classes coming up through April and into May. Anyone can sign up at lvpc.org/ltap or contact Brian Hite. Mr. Glickman asked for any comments or questions. There were none.

ADJOURNMENT:
Mr. Glickman stated that the next LVPC meeting is set to be virtual on April 28th. Mr. Glickman then asked if there was a motion to adjourn the meeting and Mr. Dougherty made a motion to adjourn. The meeting was adjourned.

Submitted by:
Becky Bradley, AICP, Executive Director and
Julie Benco, Regional Planner
April XX, 2022

Mr. Charles Deprill, Chairman
Upper Macungie Planning Commission
8330 Schantz Road
Breinigsville, PA 18031

RE: Air Products Campus Redevelopment – Land Use of Regional Significance
    Upper Macungie Township
    Lehigh County

Dear Mr. Deprill:

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
  - April 26, 2021 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)
- LVPC Full Commission Meeting
  - April 28, 2021 at 7:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

The project proposes to redevelop the site of the former Air Products corporate headquarters by constructing three warehouse buildings totaling 2,600,100 square feet. The project site is located at 7201 Hamilton Boulevard (parcel number 546562745585). The proposal is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* as a Warehouse, Logistics and Storage Facility.

The subject application as presented generally exhibits inconsistency with *FutureLV: The Regional Plan*. While the LVPC supports the overall intent to reuse and redevelop the site, the scale of the proposed development is not suitable for the location, which contains a mix of residential, commercial and industrial uses. The proposal does not align with the Township’s designated zoning for the area, Light Industrial District (LI), established to ‘meet current and anticipated future regional needs for light industries, offices and limited types of related commercial development… with a campus-like setting that will aid in attracting new businesses’ (§ 27-301 J.).
As a Special Exception use in the Township’s Light Industrial District, the Township Zoning Hearing Board has the opportunity to require reasonable conditions and safeguards. If this project moves forward as proposed, the LVPC offers the following comments to improve the development and minimize adverse impacts to the community and neighboring communities:

**Estimating Transportation Impacts**

The LVPC reviewed a transportation impact study (TIS) submitted with the proposal. Using the Institute of Transportation Engineers (ITE) trip generation manual, the TIS applies Land Use Code 154 High-Cube Transload and Short-term Warehouse to estimate trip generation for the proposed project. Land Use Code 154 yields a lesser trip generation estimate compared to Land Use Code 150 Warehousing, which accounts for all warehousing uses. The Pennsylvania Department of Transportation (PennDOT) recommends taking a conservative approach to trip estimates, meaning the highest possible estimated traffic trips per day, to plan for potential impacts. While the proposed building uses are currently High-Cube Trans-Load and Short-Term Warehouse at this planning stage, the type of warehouse could deviate during the planning process and in the future after tenant leases expire. Using Land Use Code 150 enables the developer and Township to better account for all possible future scenarios when considering the project location and site design, as well as planning any associated infrastructure improvements to accommodate the development (of Policy 2.4).

Trip calculations based on the proposed 2,600,100 square feet:

<table>
<thead>
<tr>
<th></th>
<th>Land Use Code 154 High-Cube Transload</th>
<th>Land Use Code 150 Warehousing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Trips</td>
<td>3,068</td>
<td>2,886</td>
</tr>
<tr>
<td>Truck Trips</td>
<td>572</td>
<td>1,560</td>
</tr>
<tr>
<td>Total Trips</td>
<td>3,640</td>
<td>4,446</td>
</tr>
</tbody>
</table>

Additionally, the submitted TIS does not factor impacts to several key intersections along the State Route 100 corridor, including at Tilghman Street (SR 1002), Interstate 78/State Route 22, Penn Drive and Schantz Road (SR 3012). The justification for omitting these intersections was due to ongoing reconstruction of State Route 100. Regardless of construction, the redevelopment of the site into 2,600,100 square feet of warehouse facilities will have impacts on these excluded intersections. The project proposes access on Cetronia Road, leading to Trexlertown Road (State Route 6100) and connecting to State Route 100 north of State Route 222 and Interstate 78. All potential traffic impacts should be studied using data of proposed construction improvements and historical traffic (of Policies 2.1, 2.2 and 2.4).

**Congested Corridors**

Several of the excluded intersections are identified as current or future Congested Corridors connecting to the State Route 100 corridor, including:

- Schantz Road (Adams Road to State Route 100) – 2017
- Route 222 (Folk Road to State Route 100) – 2040
- Route 100 (Claussville Road to Tilghman Street) – 2040
- Tilghman Street (State Route 100 to State Route 309) – 2040
- Route 22 (State Route 100 to Wood Avenue) – 2040
Planning for potential impacts on regional identified congested corridors should not be discarded due to current construction schedules. The developers engineering team should analyze these intersections from historical data and proposed improvements to gauge any mitigation improvements required due to the impacts on the State Route 100 corridor generated by the development. The efficient movement of freight and the mobility of transportation in general is an air quality concern, as outlined in the Congestion Management Process, and should be studied and addressed as applicable (of Policies 1.1, 2.2 and 2.5).

**Safety**

The TIS should be amended after additional study of the impacts increased traffic will have on the intersection of State Route 222 with Kressler Road, Hamilton Boulevard, South Cedarbrook Road and ramps to Interstate 78/State Route 309. This location, approximately three miles east of the project, has been the site of 44 reportable accidents from January 2016 to December 2020 (most recent data available).

The stretch of State Route 222 from State Route 100 to Dorney Park is listed in the Lehigh Valley Transportation Study Safety Plan as a High-Crash Corridor. Future planned safety improvements or mitigation efforts are reliant on PennDOT and nearby municipalities being made aware of development that adds traffic volumes to identified safety corridors. Studying the impacts of increased traffic at this location is necessary for a safe transportation network and for the improvements required to mitigate traffic accidents. This area will be a main arterial to points east on Interstate 78 via State Route 222 from the project location (of Policies 2.2 and 2.4).

*State Route 222 just west of Interstate 78, the main State Route 222 Corridor from the project location to Interstate 78 Eastbound*
**Cetronia Road Curve**
The LVPC supports the proposed relocation and realignment of Cetronia Road as a safety improvement to eliminate the existing sharp corner curves. Between 2016 to 2020 there were 25 reportable accidents on this corner. This softening of the curves is a necessary planning strategy for the benefit of the community and improves access to and from the development (of Policy 2.2).

**Crash history at the Cetronia Road s-curve**

Future maintenance responsibilities must be identified for the residual land (2.2 acres) north of the proposed realignment of Cetronia Road, including sidewalk, snow removal and mowing of grass. Adjacent property owners should be made aware of the designated ownership and any associated maintenance activities or responsibilities.

The submitted plans indicate that Timber Trail roadway north of the proposed cul-de-sac is a stone driveway, however PennDOT identifies this as a municipal gravel road (OneMap). Ownership and design standards of Timber Trail, and its connection to the proposed cul-de-sac, must be clarified. Naming for the cul-de-sac should be done in coordination with the US Postal Service and emergency management for Upper Macungie considering the existing residences using “Timber Trail” as a mailing address (of Policy 2.2).
Site Access
The submitted plans include one site access point along Cetronia Road. The LVPC recommends including a second site access point to better facilitate traffic movements during employee shift changes. A secondary passenger vehicle-only access west of the proposed access could also improve access for emergency service personnel (of Policy 5.1).

Freight Rail Opportunities
The existing rail spur located on the western portion of the site should be preserved, and opportunities to incorporate the spur into proposed Building #1 should be explored. The possibility to incorporate rail freight movements, whether now or in the future depending on tenant needs, can support reducing truck freight movements on the roadway and provide an opportunity to capitalize on existing rail infrastructure (of Policy 2.4).
Bicycle, Pedestrian and Transit Connections

The inclusion of sidewalks along all road frontages of the project, including an “alternative” sidewalk plan along Hamilton Boulevard to preserve the existing mature sycamore trees, is a creative and commendable aspect of the site design (of Policy 1.3).

However, the project should also incorporate sidewalk connections from the principal access to Evonik east of the project location), connecting along Hamilton Boulevard to proposed Building #1. The retail and fast-food establishments south of Hamilton Boulevard are a likely lunch break destination for future employees. Providing safe and efficient pedestrian connections from the internal buildings to the proposed improvements along Hamilton Boulevard and the signalized intersection with existing crosswalks would improve safety and support reducing pedestrian fatalities towards zero (of Policies 5.1 and 5.3).

Hamilton Boulevard is a bicycle commuting corridor with existing conventional bike lanes identified in the Walk/RollLV: Active Transportation Plan. Walk/RollLV recommends these bike lanes be upgraded to include a minimum five-foot wide bike land and a two-foot buffer (page 81). The Hamilton Boulevard Corridor Study, completed by Upper Macungie and Lower Macungie townships in 2015, also includes concept designs for this portion of Hamilton Boulevard (page 90). The LVPC encourages the Township and developer to explore implementation opportunities in conjunction with the proposed redevelopment. Connections to proposed employee parking lots should also be provided, with bicycle racks at each building, to encourage alternative transportation options and offer a seamless network for employees to safely ride to work (of Policies 2.2, 2.3 and 5.3).

The Lehigh and Northampton Transportation Authority (LANTA) serves public transportation in the vicinity, with a LANtaBus Route 613 traveling eastbound on Hamilton Boulevard from Trexlertown Road to Trexlertown Plaza, and continuing eastward towards Mill Creek Road. LANTA’s Enhanced Bus Service (EBS) Route 101 also travels on Hamilton Boulevard, terminating at Trexlertown Plaza. The proposed pedestrian connections to Hamilton Boulevard provide an opportunity to coordinate with LANTA to facilitate installation of modern bus stop shelters with lighting, seating and trash receptacles.

LANTA does not provide transit service on Cetronia Road, and has no plans to extend service at this time. However, the proposed plan does not include an internal through-street connection between Cetronia Road and Hamilton Boulevard. Providing a through-street connection within the project could increase opportunities for LANTA to better serve the site. Future service plans would be dependent on this connection to improve circulation. The proposed sidewalks along the Cetronia Road and Hamilton Boulevard property frontages support transit accessibility, however a more comprehensive pedestrian network should be included between all buildings proposed on the site to ‘improve connections between mass transit and pedestrian and bicycle infrastructure’ (of Policy 2.3).

The LVPC strongly recommends direct engagement with the LANTA Planning Department to discuss transit supportive land use options in relation to the site that would ultimately warrant transit service. Molly Wood, LANTA Planner/Land Use Specialist, can be reached at 610-439-1376 or mwood@lantabus-pa.gov.
Tractor-Trailer Amenities
The LVPC commends the onsite truck parking spaces provided for each building, which are sized appropriately to accommodate the full length of tractor-trailers. Truck and driver amenities should also be incorporated to enable overnight parking. Parking spaces should include electrical hookup infrastructure to limit tractor-trailer idling and support the improvement of air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling Law (of Policy 3.2). Additionally, the truck parking spaces should be prepared for the future of electric vehicles including tractor-trailers and the necessary charging infrastructure that may be required in the future (of Policy 2.5). These amenities support driver health and safety, facilitate compliance with hours of operation requirements and improve safety conditions for other drivers on the roadway (of Policy 2.2).

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. Violators of this law are subject to state-related fines and penalties (Title 75 § 3720, amended by Senate Bill 114). 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).

Truck Routing
The developer should work with PennDOT to plan appropriate truck routes to Interstate 78, Interstate 476, State Route 222, State Route 309 and State Route 100. Each proposed building should include signage at truck parking areas to communicate truck routes and any other relevant regional or localized ordinances involving freight movement (of Policy 2.4).

Sustainability
Redevelopment of the site includes the removal of existing solar panels, formerly used by the Air Products campus operations. The LVPC strongly encourages the replacement of these solar panels to promote sustainable practices. Solar panels can be well-utilized on expansive roof surfaces when the roofs are constructed to accommodate their weight. Additionally, the developer should consider opportunities to incorporate sustainable energy systems into building functionality, which reduce overhead operational costs and ‘minimize 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 Little Lehigh 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 further ‘coordinate land use decisions across municipal boundaries’ (of 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.

If this proposal moves forward for approval, please call or email me 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: Robert Ibach, Jr., Township Manager; Daren Martocci, Township Director of Community Development; John Toner, Township Planning & Zoning Specialist; David Alban, Jr., PE, Township Engineer; Patrick J. Garay, Air Products, Applicant; Bruce Anderson, The Pidcock Company; Brian Carl, Weisenberg and Lowhill Township; David Manhardt, South Whitehall Township; Thomas Beil, Lower Macungie Township; Derrick Herrmann, PE, PennDot District 5 Traffic & Operations Engineer; Molly Wood, LANTA Planner/Land Use Specialist; Garrett Cook, Lehigh County Conservation District; Geoff Reese, LVPC Director of Environmental Planning; Paul Carafides, LVPC Director of Transportation Planning and Data
April XX, 2022

Mr. Brian Carl, Administrator
Lowhill Township
7000 Herber Road
New Tripoli, Pennsylvania 18066

RE: 2951 Betz Court Warehouse – Land Development
Lowhill Township
Lehigh County

Dear Mr. Carl:

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
  - April 26, 2022 at 12:00 PM
  - https://lvpc.org/meetings.html
- LVPC Full Commission Meeting
  - April 28, 2022 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 and Logistics Facility category. This project involves the construction of a 299,880-square-foot warehouse/distribution center on a 52-acre site located north of Kernsville Road (SR 4003) approximately 2,978 feet east of State Route 100 in Lowhill Township (parcel number 545725755429).

Although the subject property is located within an area identified in FutureLV: The Regional Plan as a Farmland Preservation area, there are a mix of land uses in close proximity, including small industrial, retail, service, and residential. The plan is generally consistent with the draft General Land Use Plan currently being reviewed for the draft Northern Lehigh multi-municipal plan.

The LVPC offers the following additional comments:
Transportation Site Plan

The proposed warehouse will generate 60 new trips during the weekday A.M. peak hour and 62 new trips during the weekday P.M. peak hour. Kernsville Road connects with both Route 100 and Route 309 (North Whitehall Township). That portion of Kernsville Road has experienced 55 crashes in the last five years. Twelve of those crashes occurred between Route 100 and the site of the project. The Route 100/Kernsville Road intersection experienced four crashes in the last five years.

The transportation study has a study area that includes the Route 100/Kernsville Road intersection, the Kernsville Road/ Betz Court intersection, and the access driveways off Betz Court. According to the study, truck routing will begin at the Route 100/Interstate 78 interchange which is located approximately 3.4 miles south of the site. Over the past five years, there have been 142 reported crashes along Route 100 between the Interstate 78 interchange and the Kernsville Road intersection. Of that, 33 crashes occurred within the Township jurisdiction. The average daily traffic counts along that portion of Route 100 ranges from 7,934 – 15,867. Trucks make up 5%-10% percent of traffic, with the number of counts decreasing as vehicles travel northbound towards Kernsville Road. The 218 Lehigh and Northampton Transportation Authority (LANTA) bus route travels up Route 100 and turns right at the intersection onto Claussville Road. No LANTA Bus Routes travel down Kernsville Road.

LVPC offers the following recommendations:

1. The applicant should provide an onsite truck turning templates plan that provides the turning movements of the largest trucks or vehicles that will access the property.

2. The applicant should provide an emergency access that connects from the passenger parking lot to the truck parking lot on the east side of the building. (of Policy 5.1)
3. The applicant should extend the proposed sidewalk to connect to Betz Court and extend it to the east end of the building where the passenger parking lot ends to provide a safe pedestrian connection to the building entrance. (of Policy 2.1)

4. The nearest overnight truck facility is located at the Route 873 interchange off Interstate 78. The project should provide onsite truck parking spaces with amenities which are essential for truck drivers to comply with state hours of operation federal requirements. The building should include driver lounges, as well. This proactive planning and implementation will provide parking in a safe, secure, and convenient location onsite. (of Policy 2.4)

5. The overnight truck parking spaces should have electrical hookup infrastructure to support in cab hookups for driver comfort in lieu of having trucks idle to power electrical devices. Additionally, the truck parking spaces should be prepared for the future of electric vehicles including tractor trailers and the necessary charging infrastructure that may be required. (of Policy 2.5)

6. Snow removal equipment located in a safe location for compliance with the Pennsylvania Snow Removal law should be provided at several locations of the warehouse campus. The ability to remove snow and be able to remove it from the ground in severe winter weather events is an amenity that commercial truck centric buildings should provide onsite. (of Policy 2.2)

7. The applicant should provide wayfinding signs on Betz Court to direct passenger car and truck traffic to the correct parking lots.

8. The applicant and Lowhill Township should consider coordinating with LANTA to extend bus service to the site of the proposed warehouse. (of Policy 2.3)

**Truck Routing**

9. With new traffic produced by the proposed use, there should be a discussion with the applicant, Lowhill Township, and PennDOT to add a left turn signal for traffic turning onto southbound Route 100 from westbound Kernsville Road. (of Policy 2.4)

10. Kernsville Road also connects with State Route 309 in North Whitehall Township approximately 3.6 miles east of the site. Route 309 also serves as an arterial that connects to an Interstate 78 interchange. There is a Route 309 resurfacing project listed on the Draft 2023-2026 Transportation Improvement Program (TIP) that will cover Route 309 between Walbert Avenue and Shankweiler Road in North and South Whitehall Townships. One of the components involved in the project is the reconstruction of the State Route 4003 (Orefield Road) and Route 309 intersection to accommodate truck turning movements and signal replacement. This connection should be added to the study and the applicant should coordinate necessary intersection improvements at Route 309 and Kernsville Road with North Whitehall Township and Pennsylvania Department of Transportation (PennDOT) District 5-0 to accommodate truck turning movements and signal replacement (of Policy 2.2 and Policy 2.4).
11. Lowhill Township, PennDOT and the applicant should discuss truck movements at the Route 100/Kernsville Road intersection. The parties should discuss potential stacking on northbound Route 100 when trucks are turning right onto Kernsville Road. There is a right turn lane onto Kernsville Road with a raise concrete dividing island. The lane is 70-80 feet long and is designed to accommodate passenger cars more than trucks. (of Policy 2.4)

12. The applicant should work with PennDOT and all municipalities along the Route 100 and Route 309 corridor in creating a truck routing plan that addresses congestion,
safety, maintenance and accessibility to and from the site location. This should also include the Township-owned Orchard Road and Pony Road, which truck drivers may access as alternate routes onto Kernsville Road and Route 100. (of Policy 2.2)

Steep Slopes and Woodlands
A substantial portion of the property contains steep slopes and/or wooded features. These areas are included in the Township Zoning Ordinance's Environmental Protection Area (EPA). The EPA regulations require a detailed on-site soil survey be conducted for soil suitability. Additionally, all development on slopes 25% or greater is prohibited in the EPA.

Policy 3.1 of Future LV recommends the preservation of natural resources in the development process, as well as maximizing preservation of woodlands and critical habitats.

Sustainability
The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'minimize environmental impacts of development' (Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing. 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.

Landscaping
The existing tree line along the eastern property line paralleling Kernsville Road should be extended to the south to screen all of the building and parking areas. The tree cover should be
augmented by lower height bushes and landscaping materials. The introduction of native landscape material and pervious pavement will 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (Policy 3.2).

**Storm Water**

The project site is located within the Jordan 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.

Sincerely,

[Signature]

Dean S. Severson, AICP  
Director for Regional Planning

CC: Chris Noll, Lowhill Township Engineer; Mark Steidinger, Heidelberg Township Planning Commission Chair; Harold Handwerk, Lynn Township Planning Commission Chair; Brian Carl, Weisenberg Township Administrator; Dan Stevens, Slatington Borough Manager; Todd Weidman, Washington Township Manager; George W. Wessner, Jr. and Cheree Wessner, Jr., Landowners; CRG Services Management, LLC, Applicant; Snyder, Secary & Associates, Project Engineer
April XX, 2022

Mr. Brian Carl, Administrator
Lowhill Township
7000 Herber Road
New Tripoli, Pennsylvania 18066

RE: 2766 Route 100 Warehouse – Subdivision and Land Development
Lowhill Township
Lehigh County

Dear Mr. Carl:

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
  - April 26, 2022 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)
- LVPC Full Commission Meeting
  - April 28, 2022 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 in the Warehouse and Logistics Facility category. This project involves a lot line adjustment to create a 43.1-acre lot, and the construction of a 312,120-square-foot warehouse/distribution center. The property is located on the west side of State Route 100 (SR 4003) south of the intersection with Kernsville Road in Lowhill Township (parcel number 545702330003).

Although the subject property is located within an area identified in FutureLV: The Regional Plan as a Farmland Preservation area, there are a mix of land uses in close proximity, including small industrial, retail, service and residential. The plan is generally consistent with the draft General Land Use Plan currently being reviewed for the draft Northern Lehigh Multi-Municipal Comprehensive Plan.
Transportation Site Plan
The proposed warehouse will generate 534 daily trips including 187 daily truck trips. It will also generate 66 new trips during the weekday A.M. peak hour and 72 new trips during the weekday P.M. peak hour. The applicant is also planning two other industrial projects (2951 Betz Court & Lehigh Industrial Park) that will be constructed on Kernsville Road, east of the Route 100/Claussville/Kernsville roads intersection.

The transportation study has a study area that highlights State Route 100 as the main access road to and from the site. Over the past five years, there have been 142 reported crashes along Route 100 between the Interstate 78 interchange and the Kernsville Road intersection. Of that, 33 crashes occurred within the Township jurisdiction. The average daily traffic counts along that portion of Route 100 ranges from 7,934 – 15,867. Trucks make up 5%-10% percent of traffic, with the number of counts decreasing as vehicles travel northbound towards Kernsville Road. The 218 LANTA bus route travels up Route 100 and turns left at the intersection onto Claussville Road.

According to the study, truck routing will begin at the State Route 100/Interstate 78 interchange, which is located approximately 3.4 miles south of the site. The study recommended that a 250-foot-long northbound left-turn lane and a 175-foot-long southbound right-turn lane be added along Route 100 at the proposed driveway location.
The LVPC offers the following additional comments:

1. The applicant should provide an onsite truck turning templates plan that provides the turning movements of the largest trucks or vehicles that will access the property.

2. The proposed access drive is located right across the street from a driveway on an existing residential property. The Township and applicant should consider relocating the proposed access drive. Both parties should consider a one-way ingress and a one-way egress into and out of the property. (of Policy 2.4)

3. The applicant should provide a gate at the emergency access entrances. (of Policy 5.1)

4. The Township should require the applicant to provide any road improvements included in this project on the recorded plan. (of Policy 2.4)

5. The nearest overnight truck facility (Sheetz) is located at the Route 863 interchange off Interstate 78. The project should provide onsite truck parking spaces with amenities which are essential for truck drivers to comply with state hours of operation federal requirements. Driver lounges should be planned for within the buildings as well. This proactive planning and implementation will provide parking in a safe, secure and convenient location onsite. (of Policy 2.4)

6. The overnight truck parking spaces should have electrical hookup infrastructure to support in cab hookups for driver comfort in lieu of having trucks idle to power electrical devices. Additionally, the truck parking spaces should be prepared for the future of electric vehicles including tractor trailers and the necessary charging infrastructure that may be required. (of Policy 2.5)

7. Snow removal equipment located in a safe location for compliance with the Pennsylvania Snow Removal law should be provided at several locations of the warehouse campus. The ability to remove snow and be able to remove it from the ground in severe winter weather events is an amenity that commercial truck centric buildings should provide onsite. (of Policy 2.2)

8. The applicant should provide wayfinding signs on the property to direct passenger car and truck traffic to the correct parking lots.

9. The applicant and Lowhill Township should consider coordinating with The Lehigh and Northampton Transportation Authority (LANTA) to provide a bus stop on site. (of Policy 2.3) LANTA provides a route extension with limited service directly to Corporate Court off of Claussville Road, approximately 0.5 miles west of the project site on Route 100. LANTA has no immediate plans to increase service to this northern portion of Route 100 in Lowhill Township but will continue to monitor growth in areas that would warrant future transit service. The LVPC recommends the inclusion of sidewalks on Route 100 for safe boarding/alighting to increase the likelihood of future transit service in this
vicinity (of Policy 5.2) and ‘improve mixed-transportation access to areas with high or growing employment opportunities’ (of Policy 4.3).

10. The project site is on a 100-foot downhill slope that starts at Route 100 and ends at Windy Road. The applicant should provide both Lowhill Township and Weisenberg Township a stormwater report that assures stormwater runoff is deviated from Windy Road. (of Policy 2.4)

**Truck Routing**

11. The Sheetz overnight truck stop in Weisenberg Township is located 4.6 miles from the site. Truck drivers may use Seipstown and Claussville Roads to get to and from the site and truck stop. The illustration below shows the route highlighted in blue. The existing traffic counts for this route range from 633 - 3276 average daily trips (ADT) with truck percentages ranging from 5% - 11%. The route experienced 11 crashes over the last five years. The applicant, Lowhill Township and Weisenberg Township should discuss the traffic impacts the proposed use could have on Seipstown Road, Claussville Road and Route 863. (of Policy 2.2 and Policy 2.4).

12. With this project and the two other industrial projects that are planned on Kernsville Road, Lowhill Township, PennDOT, and the applicant should discuss truck movements at the Route 100/Kernsville Road intersection. Intersection improvements could include 1) adding a right turn lane on eastbound Claussville Road that can accommodate truck traffic turning onto Route 100, 2) optimizing traffic signal timing at the intersection, 3) adding a left-turn signal for westbound Kernsville Road traffic turning onto southbound Route 100 and 4) improving the northbound Route 100 right-turn lane onto Kernsville Road which is currently 70-80 feet long. (of Policy 2.4)
Steep Slopes and Woodlands
A substantial portion of the property contains steep slopes. There are also wooded lands on the southwestern portion of the property as well as wetlands identified on the plan.

Policy 3.1 of *FutureLV* recommends the preservation of natural resources in the development process, as well as maximizing preservation of woodlands and critical habitats.

Sustainability
The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and ‘minimize environmental impacts of development’ (Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing. 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.

Storm Water
The project site is located within the Jordan 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.

Sincerely,

Dean S. Severson, AICP
Director for Regional Planning
CC: Chris Noll, Lowhill Township Engineer; Mark Steidinger, Heidelberg Township Planning Commission Chair; Harold Handwerk, Lynn Township Planning Commission Chair; Brian Carl, Weisenberg Township Administrator; Dan Stevens, Slatington Borough Manager; Todd Weidman, Washington Township Manager; Albert Karom, Jr. and Christine R. Karom, Landowners; 2766 Route 100 Associates, LLC, Equitable Owner/Applicant; Snyder, Secary & Associates, Project Engineer
April XX, 2022

Ms. Cynthia Carman Kramer
Palmer Township Planning Director
3 Weller Place
Palmer, Pennsylvania 18045

RE: Carson Lot 100/200 – Land Use of Regional Significance
Palmer Township
Northampton County

Dear Ms. Kramer:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, under the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings will be virtual, and occur on:

- LVPC Comprehensive Planning Committee Meeting
  - April 26th, 2022 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)
- LVPC Full Commission Meeting
  - April 28th, 2022 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* in the Warehouse, Logistics, and Storage Facilities category. The project at 1571 Van Buren Road (parcel numbers J8-27-1-0324, J8-27-1A and K8-5A-1-0324) covers 95 acres within the Chrin Commerce Centre, the 800-acre industrial park that is located near Route 33 between Tatamy and Nazareth. The applicant proposes development in two phases. Phase one is for the land development of 48.121 acres to construct three warehouses. The buildings would be 221,600 square feet, 173,405 square feet, and 260,200 square feet. Phase two of the project proposes relocating an existing historic stone farmhouse, demolishing pavement adjacent to the farmhouse, and three water gardens for the construction of two additional warehouses of 229, 618 square feet, and 257,860 square feet in size.

A large section of Lot two running parallel to Main Street will be retained for future commercial development. The nature of that development is undetermined at this time therefore road access and water management for this section of the property is not included in this review.
The proposal generally exhibits consistency with *FutureLV: The Regional Plan* because the site’s location is suitable for freight mobility while minimizing the quality-of-life impacts on residents (Policy 2.4). However, aspects of the site design can be improved to further support the long-term interests of the Township, community and developer:

**Historical Building**

The LVPC commends developer’s decision to relocate, and not demolish, the historic stone farmhouse located on lot J8 27 1A of the proposed plan. The existing structure can be seen at its current location where Building 1 is proposed. Relocating the historic building will ‘Promote development that complements the unique history of the valley’ (Policy 5.4).

**Multimodal Accessibility**

The Lehigh and Northampton Transportation Authority (LANTA) currently provides public transportation service directly to the project site along Van Buren Road. The inclusion of sidewalks along the entirety of the frontage of Van Buren Road is commendable for quality pedestrian transportation planning, especially in transit-reliant employee commuter developments such as this (Policy 5.1).
Two LANTA bus stops are in the vicinity of the project on the Southbound lanes of Van Buren Road. LANTA should be consulted as to the practicality of adding a bus stop shelter with modern amenities and bus pull-off area along the frontage of the project. LANTA Planner/Land Use Specialist Molly Wood can be contacted by e-mail mwood@lantabus-pa.gov.

It is proposed that the center access driveway will align with the access driveway to the development on the west side of Van Buren Road. The LVPC recommends that crosswalks including pavement markings and pedestrian crossing signs be installed on Van Buren Road at the access driveway intersection to afford pedestrians the ability to navigate safely and efficiently from the southbound LANTA bus stops currently in place. The access driveway intersection with Van Buren Road should also be lighted to provide night visibility for pedestrians crossing the road and to help ensure their visibility to motor vehicles after dark (Policy 2.3).

Bicycle amenities should be included in the development to allow “last mile” commutes from local LANTA bus stops as well as potential employees who cycle to work to have a safe and secure area to park their bicycles (Policy 5.2).

Preferred “Truck Route” signage should be provided at the exits to the development to communicate to drivers the safest and most efficient route to State Route 33 and to mitigate the impacts of trucks on the communities along Van Buren Road south of overpass for State Route 33 (Policy 2.4).

Traffic Impacts

The LVPC reviewed a transportation impact study (TIS) for the proposal. Based on the combined square footage of the five buildings proposed, the development is anticipated to generate an average of 1,996 vehicle trips per day, 686 of which will be trucks (Institute of Transportation Engineers Trip Generation Manual, 11th Edition). The project is in an area with access to a Route 33 interchange, serving to minimize adverse impacts to nearby roadways generated by truck traffic.

Tractor-Trailer Accommodations

The proposed project is truck centric in nature and should provide onsite long duration truck parking opportunities for drivers who may not be legally allowed to drive due to federal hours of vehicle operation requirements. A lack of truck parking is a regional, as well as a national, concern that can be incrementally mitigated by providing opportunities for safe and efficient parking by the developers of such warehousing and logistics facilities. These types of buildings rely on trucks to supply and transport goods and services and their needs should be addressed during the development process. Truck parking amenities should be provided in well-lit truck parking areas with trash and recycling receptacles. No driver amenities are shown on the plan, such as an overnight parking area for tractor-trailers with electrical hookup provisions to reduce combustion engine emissions.
Longer-duration parking areas are essential for a safe transportation network, considering safety limitations on driver hours of operation per day (Policy 2.5). On-street truck parking is an issue throughout the Lehigh Valley, and currently, trucks occasionally park along Main Street east of Van Buren Road:

Trucks parked along the Main Street shoulder, facing west towards the Van Buren Road intersection and the project site:

The accommodation of onsite longer-term parking would allow drivers and their equipment to be parked in a safer location than on the roadway and providing driver amenities such as a lounge and bathrooms further supports the health and safety of drivers (Policy 2.4). Truck parking spaces should provide electrical hookups to limit idling, ensure compliance with the 2008 Pennsylvania Diesel Idling Law and support the improvement of air quality (Policy 3.2). Electric charging opportunities should be integrated into the passenger vehicle parking
lots to help plan for the future of electric vehicles as most car manufacturers are eliminating internal combustion vehicle production within the next 20 years (Policy 2.5). The inclusion of truck charging and electric hookups in these long-duration parking areas will help prepare for the future of electric vehicles.

Truck operators are required by the Pennsylvania State Snow Removal Law to clear snow and ice that could fall from their vehicles and onto the roadway or other vehicles. The developer should provide snow removal equipment on-site to remove snow from the tops of trucks and trailers, to enable drivers to safely remove snow before departure and eliminate snow and ice shear while traveling on public roads (Policy 2.2).

Minimize Environmental Impacts

The LVPC commends the thorough inclusion of landscaping throughout the project site. Landscaping creates a more attractive development and can significantly reduce the visual impact of large-scale buildings on the community. It also minimizes impacts on the environment by offsetting the development’s carbon footprint (Policy 3.2).

The LVPC strongly encourages the applicant to consider the benefits of incorporating sustainable building, design, and operations practices. Solar energy can be well-utilized on these large buildings when the roof is structurally designed to accommodate them. These practices ‘reduce climate change impacts’ (Policy 3.4) while also reducing overhead operational costs and are in the best interest of the developer and community.

The LVPC encourages the Township to continue to pursue environmental review as part of the development process to promote safe and secure community design (Policy 5.1).

Storm Water

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.

Our review does not include an in-depth examination of the plan relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

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 reviews.
Please contact LVPC if you have any questions about this review.

Sincerely,

[Bambi Griffin Rivera signature]

Bambi Griffin Rivera
Community and Regional Planner

cc: Carson Van Buren LLC, Applicant; Keith Ottes, Project Engineer; Shaun Haas, Project Engineer; Robert Williams, Palmer Township Manager; Brian Dillman, PE, Palmer Township Engineer; Jill Garcia, Wilson Borough Manager; John Cornell, Forks Township Manager; Robert Hayes, Tatamy Borough Council Chair; Sean Dooley, Stockertown Borough Planning Commission Chair; Anita Caughy, Stockertown Borough Secretary; Lisa Klem, Upper Nazareth Township Manager; Lori Seese, Lower Nazareth Township Planning Director; Lori Stauffer, Lower Nazareth Township Manager; Amanda Raudenbush, Bethlehem Township Planning Director; Leslie Huhn, Lower Saucon Township Manager; Mikal Sabatine, Williams Township Manager; Donald Young, Glendon Borough Council President; 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
April XX, 2022

Darlene Heller, AICP
Director of Planning and Zoning
10 East Church Street
Bethlehem, PA 18018

RE: Lehigh Valley Academy Regional Charter School (New LVA Campus) – Land Use of Regional Significance
City of Bethlehem
Lehigh County

Dear Ms. Heller:

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
  - April 26, 2022 at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)
- LVPC Full Commission Meeting
  - April 28, 2022 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* in the ‘Educational Facilities’ land use category. The project proposes a 25,520-square-foot gymnasium and redevelopment of existing office space for a new Lehigh Valley Academy Campus. The project is located at 2040 Avenue C (parcel number 641940680929). This proposal exhibits general consistency with *FutureLV* because it is in the development area of the General Land Use Plan and relocates a school along a Corridor (of Policy 4.3). Additionally, the relocation of the school on an existing developed property ‘encourages reuse and redevelopment within urban areas’ (of Policy 1.1), ‘expands access to education’ (of Policy 4.1) and enhances the long-term viability of assets (of Policy 1.3).

**Multimodal Accessibility**

LANTA provides public transportation service directly to the project site, with a westbound bus stop on Avenue C along the property frontage, in between the Schoenersville Road intersection and the main entrance driveway to the existing three-story building on Avenue C. The LVPC strongly recommends including a sidewalk along the full length of the property frontage to help complete a gap in the sidewalk network on the north side of Avenue C. LVPC also recommends a walkway from the existing bus stop location along the main entrance driveway to the main
entrance of the building, as well as a comprehensive pedestrian network throughout the project site to support the walkability of the charter school campus and ‘connect assets to diverse transportation options’ (of Policy 1.3). The addition of sidewalk along this property would ‘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).

The LVPC has copied appropriate representatives from adjacent municipalities to further ‘coordinate land use decisions across municipal boundaries’ (of 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 with any questions about this review.

Sincerely,

Julie Benco
Regional Planner

cc: Michael Alkhal, PE, City of Bethlehem Engineer/Public Works Director; Lehigh Valley Academy Regional Charter School, Applicant/Property Owner; Terry DeGroot, Terraform Engineering; Mark Thomas, Chair, Hanover Township Planning Commission, Lehigh County; John J. Finnigan, Manager, Hanover Township, Northampton County; Irene Woodward, AICP, Director of Planning & Zoning, City of Allentown; Kerry Rabold, Planning & Zoning Officer, Salisbury Township; Christopher Bennick, Chair, Fountain Hill Borough Planning Commission
<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comprehensive Plan Update</td>
<td>Forks Township</td>
<td><em>Forks Township Draft Comprehensive Plan</em> – an update to the Township’s current comprehensive plan prepared in 2009.</td>
<td>Exhibits inconsistency with <em>FutureLV</em> – Information about existing sewer, water and stormwater infrastructure and considerations for how current and future services tie in with the Township’s anticipated growth must be included to meet requirements of the Pennsylvania Municipalities Planning Code. The remaining content in the Draft Plan serves to promote several goals and policies outlined in <em>FutureLV</em>.</td>
</tr>
<tr>
<td>Zoning Map Amendment</td>
<td>City of Allentown</td>
<td><em>South 6th Street and West Cumberland Street Rezoning to Medium-High Density Residential</em> – proposes to rezone a series of parcels generally located at South 6th Street and West Cumberland Street to Medium-High Density Residential (R-MH) Zoning District to facilitate construction of four apartment buildings, consisting of one- and two-bedroom units..</td>
<td>Generally exhibits consistency with <em>FutureLV</em> - promotes reuse of vacant properties in an urban area (if Policies 1.1 and 5.4). The site proposed for rezoning is located in a highly walkable neighborhood of the City with nearby LANTA transit service. Increasing housing density in this location serves to ‘diversify price points and types of available housing’ (of Policy 4.5) and ‘increase social and economic access to daily needs’ (of Policy 5.2).</td>
</tr>
<tr>
<td>Project</td>
<td>Municipality</td>
<td>Statement of Purpose</td>
<td>LVPC Comment</td>
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<tr>
<td>Sewage Facilities Plan Update</td>
<td>Northampton Borough/Allen Township</td>
<td>Borough treatment plant currently serves the Borough and portions of the Township. The plan evaluates existing and future public sewer needs of the Borough and Township in defined sewer service areas as well as on-lot system needs. Based on evaluation over 20-year planning period, an additional 0.274 million gallons per day (mgd) is required to meet future sewer service area needs. The plan recommends upgrading the Borough treatment plant from 1.5 (mgd) to 2.0 mgd. Borough will investigate/reduce infiltration/inflow (I/I) in sewer system. Township will adopt sewage management plan for on-lot systems. Potential infill development in southern area of Township between the Borough and industrial development that includes FedEx is recommended to connect to Catasauqua sewer treatment plant. The industrial development is served by Catasauqua plant, which has capacity to meet identified future needs (0.17 mgd) of the infill development.</td>
<td>Treatment plant upgrade exhibits consistency with FutureLV. Proposed future sewer service areas primarily located within designated Development area, with some areas partially within Preservation Buffer and Farmland Preservation. Sewer service should be provided in areas recommended for Development in the General Land Use Plan or consistent with the action to “match development intensity with sustainable infrastructure capacity” (under Policy 1.1) or meet the defined Development Criteria of FutureLV. I/I removal matches with the action to ‘improve the utility and mobility infrastructure of the region.’ Township adoption of sewage management program aligns with action to ‘protect the quality and quantity of surface water and groundwater.’</td>
</tr>
<tr>
<td>Application to Renew Approval of Existing Groundwater Withdrawal &amp; Expand Service Area (DRBC Review)</td>
<td>Portland Borough/Upper Mt. Bethel Township</td>
<td>Application by Portland Borough Authority (PBA) to renew approval of existing groundwater withdrawal of up to 12.4 million gallons/month (mgm) from four wells in Upper Mt. Bethel Township. PBA serves the Borough and portions of the Township and proposes to expand service to additional areas of Township, including the Turkey Ridge Road, Mt Bethel Village and River Point Industrial areas and Portland Power Plant site. Ten-year peak month demand expected to increase to 14.88 mgm. No increase in allocation currently proposed. Ten-year renewal cycle.</td>
<td>Continued provision of service to existing customers exhibits consistency with FutureLV. The proposed service areas are not recommended for growth in FutureLV, however, due to growth interest coupled with Township zoning, the provision of the public utility infrastructure necessary for future development exhibits consistency with the action to “match development intensity with sustainable infrastructure capacity” (under Policy 1.1).</td>
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<tr>
<td>Project</td>
<td>Municipality</td>
<td>Statement of Purpose</td>
<td>LVPC Comment</td>
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<tr>
<td>Application to Renew Approval of Exiting Groundwater and Surface Water Withdrawal (DRBC Review)</td>
<td>Whitehall Township</td>
<td>Application by Holcim US, Inc. to renew approval of existing groundwater and surface water withdrawal to supply up to 70.68 million gallons per month of water to the applicant’s cement manufacturing plant. Water use is primarily for non-contact cooling purposes. Water is withdrawn from two existing wells and existing intake on the Lehigh River. No increase in allocation proposed. Ten-year renewal cycle.</td>
<td>Exhibits consistency with FutureLV action to ‘protect the quality and quantity of surface water and groundwater’ (under Policy 3.2). No substantial adverse impacts 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>
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</tbody>
</table>
## Project Review Summary Sheet

**Environment Committee**  
**Date:** April 2022

<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Statement of Purpose</th>
<th>LVPC Comment</th>
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<tbody>
<tr>
<td><strong>Lehigh County Authority - Preliminary Capital Plans (2023-2027)</strong></td>
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<td><strong>SUBURBAN DIVISION</strong></td>
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<td><strong>New Projects:</strong></td>
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<td><strong>Water</strong></td>
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<td><strong>Water Systems Master Planning</strong></td>
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<td>Preparation of preliminary water supply study for Central Lehigh Division (Upper Macungie, Lower Macungie and small portions of Lowhill, Weisenberg and Upper Milford) and North Whitehall Division to evaluate supply capacity requirements to meet existing and future needs.</td>
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<td><strong>Upper System Tank Installation Project</strong></td>
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<td>Aging existing 2-million-gallon storage tank in Central Lehigh Division Upper System in Upper Macungie Township north of I-78 to undergo repairs to extend service life. Construction of 2-million-gallon water storage tank to provide redundancy and long-term storage needs in Upper System.</td>
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<td><strong>New Project:</strong></td>
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<td><strong>Sewer</strong></td>
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<td><strong>Western Lehigh Interceptor (WLI) Major Rehabilitation and Repairs</strong></td>
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<td>Project includes infiltration and inflow investigation and remediation of sewer manholes and interceptor main line in the WLI service area.</td>
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<td>Evaluating/providing system improvements to meet existing and future needs exhibits consistency with <em>FutureLV: The Regional Plan</em> action to ‘improve the utility and mobility infrastructure of the region’ (under Policy 1.1). Provision of service should be provided in areas recommended for Development in the General Land Use Plan or consistent with the action to “match development intensity with sustainable infrastructure capacity” (under Policy 1.1) or meet the defined Development Criteria of FutureLV.</td>
<td></td>
</tr>
</tbody>
</table>
March 2022

Lehigh Valley Planning Commission

Subdivision + Land Development Monthly Report

Plan Activity

Lehigh County
- Reviews: 47
- Acres: 311.3

Northampton County
- Reviews: 46
- Acres: 852.3

Types of New Development

Housing: 914 Total Units
- Single-Family Detached: 102
- Townhouses: 94
- Apartments: 516
- Planned Residential: 0
- Twins: 50
- Assisted-Living: 110
- Manufactured Homes: 0
- Condos: 42

Non-Residential: 428,383 Total Square Feet
- Commercial: 125,121
- Retail: 9,435
- Public/Quasi-Public: 99,361
- Industrial (Warehouse)*: 169,438 (W: 50,818)
- Office: 25,028
- Transportation: 0
- Agriculture: 0
- Recreational: 0

Location of Development

Year to Date
- Residential Units
- Non-Residential Square Footage

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

* Warehouse number is a subset of industrial total square footage

Regional Totals*
- 20 Subdivision/Lot Line Adjustments
- 44 Development
- 22 Stormwater Management
- 7 Municipal Ordinances and Maps

1,163.6 Acres

* Includes preliminary and final plans

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Types of New Development

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- Townhouses: 94
- Apartments: 516
- Planned Residential: 0
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- Condos: 42

Non-Residential: 428,383 Total Square Feet
- Commercial: 125,121
- Retail: 9,435
- Public/Quasi-Public: 99,361
- Industrial (Warehouse)*: 169,438 (W: 50,818)
- Office: 25,028
- Transportation: 0
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Location of Development

Year to Date
- Residential Units
- Non-Residential Square Footage

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1,163.6 Acres

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Plan Activity

Lehigh County
- Reviews: 108
- Acres: 580.3

Northampton County
- Reviews: 97
- Acres: 1,311.9

Types of New Development

Housing: 1,332 Total Units
- Single-Family Detached: 194
- Townhouses: 201
- Apartments: 735
- Planned Residential: 0
- Twins: 50
- Assisted-Living: 110
- Manufactured Homes: 0
- Condos: 42

Non-Residential: 3,453,132 Total Square Feet
- Commercial: 174,493
- Retail: 35,945
- Public/Quasi-Public: 333,040
- Industrial (Warehouse): I: 2,872,106 (W: 2,733,486)
- Office: 37,548
- Transportation: 0
- Agriculture: 0
- Recreational: 0

Location of Development
- Plan Activity

Year to Date

Residential Units
Non-Residential Square Footage

Plan Details and Previous Reports at lvpc.org/subdivisionreport.html
TOTAL VEHICLE TRAFFIC

- State Route 33 between Newburg Road and State Route 248 (Northampton County)
- Interstate-78 just east of the State Route 309 exit (Lehigh County)
- State Route 309 just south of State Route 378 (Lehigh County)

TOTAL TRUCK TRAFFIC

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

* Aug 4 - impacted by Hurricane Isaias
** Feb 2 - impacted by Winter Storm Orlena
*** June ’21 - partial data due to PennDOT Maintenance