LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, July 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. Philip Ginder, Lehigh County

Minutes

1. ACTION ITEM: Minutes and Review of Roll Call Actions of the June 23, 2022, Commission Meeting (JB)

Comprehensive Planning Committee:

1. ACTION ITEM: City of Allentown – Land Use of Regional Significance – Lincoln Leadership Academy Foundation Middle School (SN)
2. ACTION ITEM: City of Bethlehem, Northampton County – Lehigh University – Cundey Varsity House and Goodman Field House (BGR)
3. ACTION ITEM: Upper Mount Bethel Township – Land Use of Regional Significance – RPL Planned Industrial Park Sketch Plan (JS)
4. ACTION ITEM: Comprehensive Committee Summary Sheet
   o Palmer Township – Comprehensive Zoning Ordinance and Map Revision (JS)

Environment Committee:

1. ACTION ITEM: Environment Committee Summary Sheet (SR)
   o Delaware River Basin Commission Review – Application to Renew Approval of Existing Wastewater Treatment Plant – Bath Borough Authority
o Delaware River Basin Commission Review – Application to Renew Approval of Existing Spring Water Withdrawal – BlueTriton Brands, Lynn Township
o Delaware River Basin Commission Review – Application to Approve Modifications to Existing Wastewater Treatment Plant – City of Bethlehem
o Delaware River Basin Commission Review – Application to Renew Approval of Existing Surface Water Withdrawal and Expand Service Area – City of Bethlehem

Transportation Committee:
1. INFORMATION ITEM: Northampton County Industrial Land Use Assessment (SN, DS)

Old Business:
1. INFORMATION ITEMS: Activity Reports:
   b. Mid-Year Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report (SN, BB)
   c. Highway Traffic Monitoring (BB)

Executive Director’s Report:
1. INFORMATION ITEM: Multi-Municipal Comprehensive Plans Update (BB)

Communications:
1. INFORMATION ITEM: Morning Call Business Cycle Column (MA)
   a. July 31 – How Multi-Municipal Planning is shaping the Lehigh Valley.
2. INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA)
   a. July 4 – Multi-Municipal Planning with guest Brian Carl
   b. Next show – August 1 – Growth Management in an era of intense development pressure.

Engagement and Participation:
1. INFORMATION ITEM: Zoning for Utility Scale Solar (MA)
   a. August 2, 8 am-noon – A goal of having every community represented
2. INFORMATION ITEM: 2022 Lehigh Valley Government Academy (MA)
   a. Community Planning – Wednesdays, September 7, 14, 21, 5:30-9 pm
   b. Zoning – Thursdays, October 6, 13, 20, 5:30-9 pm
3. INFORMATION ITEM: Local Technical Assistance Programs (MA)
   a. August 4: Using Traffic Counts for Data Driven Decisions, 11 am to noon
   b. August 30: Road Safety Audit, 8 am to noon.
   c. Sept. 1: Residential Streets Sidewalk Designs + Maintenance, 11 am to noon
   d. Sept. 6: Equipment and Worker Safety, 8 am to noon.
e. Sept. 13: Project Oversight, 8 am to noon.
f. Sept. 20: Speed Limits and Speed Management, 8 am to noon
    Register for classes on the LTAP website gis.penndot.gov/ltap/
    or call Brian Hite at 610-264-4544.

Next Lehigh Valley Planning Commission Meeting:
Thursday, August 25, 2022, at 7:00 pm
LEHIGH VALLEY PLANNING COMMISSION
Minutes from the Thursday, June 23, 2022 Meeting

The LVPC held a virtual public meeting on Thursday, June 23, 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, Bob Elbich, Steven Glickman, Kent Herman, Rick Molchany, Joyce Moore, Christina Morgan, Kathy Rader and Stephen Repasch.

**Northampton County**
Christopher Amato, Liesel Dreisbach, Andrew Elliott, Charles Elliott, John Gallagher, Darlene Heller, Susan Lawless, John McGorry, Stephen Melnick, Tina Smith and Tara Zrinski.

Members Absent:

**Lehigh County**
Phillips Armstrong, Percy Dougherty, Michael Harakal, Jamie Johnson, David Jones, Dennis Klusaritz, Owen O’Neil, Kevin Schmidt, Joshua Siegel, Matthew Tuerk and Irene Woodward.

**Northampton County**

**Staff Present:** Matt Assad, Julie Benco, Becky Bradley, Teresa Mackey, Steve Neratko, Dean Severson and Brad Stewart.

**Public Present:** Jeff Ward.

**COURTESY OF THE FLOOR**
There were none.

**CHAIRMAN’S REPORT**
Mr. Glickman summarized the LVPC Commissioner Retreat survey responses that were received. He also shared some background information on the National Association of Regional Councils and summarized the major themes of the 56th Annual Conference.

**MINUTES**
Mr. Glickman stated that the minutes of the Thursday, May 26th, 2022 LVPC meeting are attached, and he then asked for a motion to approve the minutes. Ms. Moore made a motion to approve the minutes. Mr. Melnick seconded the motion. The motion passed.
COMMITTEE REPORTS

Comprehensive Planning Committee:

**ACTION ITEM: City of Allentown – Land Use of Regional Significance – Neuweiler Brewery Mixed Use**

Mr. Neratko provided an overview of the project, which proposes the development and construction of 37,967 square feet of retail space and 306 apartments on a 3.8-acre parcel that was previously a vacant industrial building. Mr. Neratko noted that the site was previously the Neuweiler Brewery that has been vacant for many years and that the development consists of the demolition of most of the current structures on site. Mr. Neratko highlighted comments related to historical structures on the site, local cultural elements, bicycle racks, pedestrian access, a vegetated roof and street trees. Mr. Glickman called for a motion to accept the staff comments. Mr. Molchany made the motion; Ms. Lawless seconded the motion. Mr. Glickman asked for any comments or questions. Ms. Dreisbach commented on a minor textual edit to the letter. Mr. Melnick commented on the need for affordable housing within the region and the absence of affordable units in the project. Mr. Glickman asked if the project is pursuing historic tax credits on any parts of the project and staff responded. Motion passed.

**ACTION ITEM: Nazareth Area Multi-Municipal Comprehensive Plan**

Mr. Severson provided an overview of the Draft Nazareth Area Multi-Municipal Comprehensive Plan. Mr. Severson noted that the plan strongly aligns with the goals and policies of *FutureLV*, which includes themes of balancing preservation and development, improving air and water quality, reducing development stress on existing utility infrastructure, and increasing the availability of housing. Mr. Glickman called for a motion to accept the staff comments. Mr. Gallagher made the motion; Mr. Molchany seconded the motion. Mr. Glickman asked for any comments or questions. Ms. Lawless commented that Hanover Township, Northampton County was left out of the subject line on the letter. Mr. Amato asked if Northampton school districts were invited to participate in the plan. Ms. Bradley responded and discussed the planning efforts of current Multi-Municipal Comprehensive Plans in the region. Mr. Molchany asked about the advantages of creating Multi-Municipal Comprehensive Plans and Ms. Bradley explained the coordinated zoning advantages and capital improvement programming. Mr. Molchany emphasized that municipalities should join these multi-municipal planning efforts. Mr. Amato asked about the downsides to Multi-Municipal planning and Ms. Bradley responded. Motion passed.

**Transportation Committee:**

**ACTION ITEM: Williams Township – Zoning Ordinance Amendment – Electric Vehicle Charging Stations**

Mr. Stewart presented the proposed zoning ordinance amendment for electric vehicle charging stations in Williams Township. Mr. Stewart noted that the amendment proposes to permit Electric Vehicle Charging Stations in certain zoning districts and adds related definitions. These amendments align with the intent of *FutureLV* to ‘advance autonomous and electric vehicle technologies’ (of Policy 2.5) and ‘promote best practices in land use regulation and efficiency’ (of Policy 1.4). Mr. Stewart mentioned recommendations that include providing additional design standards and coordination with PennDOT on the implementation of electric vehicle infrastructure. 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. Ms. Lawless mentioned a related story that covered PennDOT’s plan to implement electric vehicle charging stations on major interstates and desert areas that lack charging stations. Ms. Bradley mentioned the LVTS activities that are involved with electric vehicle charging stations. Mr. Glickman asked about the logistics of implementing charging stations at service stations and Ms. Bradley and Mr. Stewart responded on the trends of fueling stations. Mr. Glickman asked about the cost of charging at electric charging stations. Mr. Repasch commented on the availability of electric vehicle charging stations. Motion passed.

**ACTION ITEM: Street Vacation – Portion of 2nd Avenue – City of Bethlehem**

Mr. Stewart presented the proposed street vacation petition for a Portion of 2nd Avenue in the City of Bethlehem. Mr. Glickman called for a motion to accept the staff comments. Mr. Herman made the motion;
Mr. Elbich seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

**ACTION ITEM: Street Vacation – 900 Block of N. Lumber Street and 900 Block of Refwal Street – City of Allentown**
Mr. Stewart presented the proposed street vacation petition for 900 Block of N. Lumber Street and 900 Block of Refwal Street in the City of Allentown. Mr. Stewart recommended that, if the petition is granted, the existing cartway and stormwater inlet and infrastructure be maintained and that the stormwater inlets remain free and clear of any impediments to the designed capture of storm water that exists currently (Policy 3.2). 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.

**Environment Committee:**

**ACTION ITEM: Draft Upper Saucon Township Comprehensive Recreation & Open Space Plan**
Ms. Mackey presented the Draft Upper Saucon Township Comprehensive Recreation & Open Space Plan and noted that the Plan’s goal is consistent with *FutureLV: The Regional Plan’s*, Policy 3.1 ‘Preserve the natural, recreational, cultural, historical and scenic assets’ and Policy 5.3 ‘Improve access to green space’. She also offered recommendations on portions of the text and mapping. Mr. Glickman called for a motion to accept the staff comments. Mr. Repasch made the motion; Mr. Molchany seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

**INFORMATION ITEM: Join the Environment Committee!**
Mr. Repasch made a request to the Commissioners that they join and attend the Environment Committee meetings and summarized the roles of the Environment Committee.

**Old Business:**

**INFORMATION ITEMS: Activity Reports**

*Monthly Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report*
Mr. Neratko presented the plan and review activity for May, which included 21 Subdivisions, 29 Development proposals, 16 reviews for Stormwater Management, and two Municipal Ordinances and Maps for a total of 68 reviews. The reviews included 650 housing units and 855,737 square feet of non-residential development. Mr. Glickman asked for any comments or questions. There were none.

*Highway Traffic Monitoring*
Mr. Stewart provided the details of the May traffic counts. He also announced that PennDOT has completed and made operational a new Continuous Automatic Vehicle Classification (CAVC) traffic counter on Route 22 between Airport Road and the Lehigh River Bridge. Mr. Stewart presented the traffic count data for vehicles and trucks on this new Route 22 counter for the second half of May. Mr. Glickman asked for any comments or questions. Mr. Glickman asked if the traffic counts accounted for both directions of traffic and Mr. Stewart responded that it accounted for both directions.

**New Business:**

**INFORMATION ITEM: Workshop on Utility Scale Solar partnered with the Penn State Solar Team**
Ms. Bradley announced that there will be a workshop on utility scale solar for municipal officials and staff, hosted by LVPC in conjunction with Penn State, on Tuesday, August 2nd. She summarized what the workshop will entail during the four-hour training, including a presentation on utility scale solar impacts and emerging trends in solar implications, an immersive tour and discussion of specific solar ordinance language in Pennsylvania.
Executive Director’s Report:

INFORMATION ITEM: National Association of Regional Councils 2022 Achievement Award for Jobs and Housing Support Initiative
Ms. Bradley announced that the LVPC and Lehigh County were awarded the 2022 Achievement Award from the National Association of Regional Councils for the work on the jobs and housing balance assessment. The recognition was given specifically for the February 2021, Job and Housing analysis that identified the neighborhoods where families were most likely to struggle with job and housing loss during the COVID-19 Pandemic. She also announced that Lehigh County Executive Phillips Armstrong was re-elected to the NARC Board of Directors, representing Pennsylvania, Delaware, New Jersey and New York and that she was re-elected to NARC’s Executive Directors Council, also representing Pennsylvania, Delaware, New Jersey and New York. Mr. Glickman congratulated Lehigh County and the LVPC staff on the award.

Communications and Public Engagement:

INFORMATION ITEM: Tilghman Street Bridge Reopening
Mr. Assad provided an overview of the Tilghman Street Bridge Opening and Block Party that LVPC attended on May 26th. Mr. Assad informed that the event drew 1,700 people including LVTS Vice Chairman Mike Rebort, LVPC Executive Director Becky Bradley, Mayor Matthew Tuerk, Representative Peter Schweyer and Senator Pat Browne. He mentioned that the LVPC/LVTS cube, which displayed data on the Transportation Improvement Program, Riverside Drive and FutureLV, was a popular attraction at the event.

INFORMATION ITEM: Business Cycle Column
Mr. Assad summarized the most recent Business Cycle column that was published in the Sunday, June 19th Morning Call. That column focused on how quickly electric cars are taking hold among investors and drivers, and detailed measures being taken right now by the state and power companies to get ready. He stated that the next column was scheduled to publish July 31, 2022 and will focus on the benefits of multi-municipal planning and what half of the region’s municipalities are doing right now to find new efficiencies and better manage the development that is coming at them.

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 that featured Department of Environmental Protection Energy Program Specialist, Colton Brown, and covered the growth in electric cars on the road, the charging station infrastructure being built, and how that effort is going to be greatly accelerated by the Federal Infrastructure Law. He stated that the next show was scheduled to air at 6:30 pm, July 4 and will focus on Multi-Municipal Comprehensive Planning and the 31 communities that are joining forces right now and feature Brian Carl, Administrator of Weisenberg and Lowhill Townships and Chair of the Northern Lehigh Multi-Municipal Plan Steering Committee.

INFORMATION ITEM: Local Technical Assistance Program
Mr. Assad announced that the Local Technical Assistance Program has a full schedule of classes coming up through August and into September. 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 July 28th. Mr. Glickman then asked if there was a motion to adjourn the meeting and Mr. Molchany made a motion to adjourn. The meeting was adjourned.

Submitted by:
Becky Bradley, AICP, Executive Director and
Julie Benco, Regional Planner
July 13, 2022

Mr. Robert Gates, Senior Planner
City of Allentown
435 Hamilton St.
Allentown, Pennsylvania 18101

RE: Lincoln Leadership Academy Foundation Middle School
Land Use of Regional Significance
Allentown City
Lehigh County

Dear Mr. Gates:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, though 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
  - July 26, 2022 at 12:00 PM
  - https://lvpc.org/meetings.html
- LVPC Full Commission Meeting
  - July 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 Educational Facilities category. This project involves the development and construction of a 24,093 square-feet middle school on an 8-acre site at 1401 East Cedar Street in East Allentown.

The property (parcel numbers 641718256152-1 and 641718204091-1) is north of East Cedar Street, west of North Plymouth Street, south of East Clay Street, and east of North Maxwell Street. The property is currently the site of the Lincoln Leadership Academy Charter School, and this would be an expansion of that use. There are a mix of land uses within the immediate area. Much of the surrounding neighborhood is a mix of housing uses, with some retail north of the site.

The property is within an area identified in FutureLV: The Regional Plan as a Development area. Areas designated for Development have infrastructure to accommodate future growth.
and redevelopment, and this project serves to locate schools and educational, social institutions in centers or along corridors’ (of Policy 1.2 and 4.3). The project will expand access to education and job training (of Policy 4.1) and promote education that improves social and economic opportunities (of Policy 4.3)

**Neighborhood Characteristics**

Neighborhood infill projects such as this encourage reuse and redevelopment within urban areas (of Policy 1.1). Considerations should be made to retain certain neighborhood characteristics of the site. Design of the façade of the proposed structure should consider form and materials that are consistent with the surrounding neighborhood (of Policy 1.3 and 4.1).
Pedestrian and Bicycle Access

The inclusion of sidewalks within the site is to be commended and 'promotes safe and secure community design' (Policy 5.1). LVPC recommends the inclusion of bicycle racks accessible to both students and to the public so that development will further enhance pedestrian and bicycle infrastructure (of Policy 2.3) and promote safe routes to schools and playgrounds (of Policy 5.2).

Storm Water

The project site is located within the Catasauqua 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.

Sustainability and Landscaping

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 helps to ‘reduce climate change impacts' (Policy 3.4).

The LVPC encourages the inclusion of a vegetative roof and additional street trees along the streets surrounding the site. This green infrastructure will help to improve regional air quality (of policy 3.2) and support sustainable building, site design and community design practices (of Policy 3.4). The LVPC encourages consideration of additional plantings to be included in the finalized design of this project to ‘create community spaces that promote physical and mental health’ (of Policy 5.3). 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 (of Policy 3.2).
Transportation and Transit

Lehigh and Northampton Transportation Authority’s (LANTA) bus route 102 runs along Union Boulevard and bus route 107 runs along Hanover Avenue, in the general vicinity of the site, but no stops exist within the immediate area. Coordination with LANTA should occur regarding any future bus stops that could serve the school.

Conclusion

The LVPC appreciates your consideration of these suggestions and coordination across development proposals and agencies. 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 municipal reviews. Please contact me if you have any questions.

Sincerely,

Steve Neratko  
Chief Community and Regional Planner

CC:  Mark Buchvalt, Engineer, T and M Associates  
      Jesse Sadiua, City of Allentown Senior Planner  
      Brandon Jones, City of Allentown Assistant Planner  
      Mark Shahda, City of Allentown Director of Public Works  
      Lee A. Rackus, Whitehall Township Planning, Zoning & Development Bureau Chief  
      Mark Thomas, Hanover Township Planning Commission Chair  
      Darlene Heller, City of Bethlehem Planning Director  
      Kerry Rabold, Salisbury Township Planning & Zoning Officer  
      Shane Pepe, Emmaus Borough Manager  
      David Manhardt, South Whitehall Township Community Development Director
July XX, 2022

Darlene Heller
Planning Director Bethlehem City
10 E. Church Street
Bethlehem, PA 18018

RE: Lehigh University Cundey Varsity House and Goodman Field House
   Land Development
   City of Bethlehem
   Northampton County

Dear Ms. Heller:

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). Both meetings
will be virtual and occur on:

- LVPC Comprehensive Planning Committee Meeting
  - July 26, 2022 at 12:00 PM
  - https://lvpc.org/meetings.html
- LVPC Full Commission Meeting
  - July 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 ‘Educational Facilities’ land use category. The project proposes a 11,194 square foot two-story addition the existing Cundey Varsity House on the Goodman Campus. The development will also include the construction of a 96,712 square foot, single-story indoor field house, a turf baseball outfield and turf practice field, and a proposed grass practice field with site and lighting improvements.

The project is located at 121 Goodman Drive (parcel number Q6 3A 1 0204E). The additions enhance the long-term viability of assets (of Policy 1.3).

The LVPC offers the following comments:

Included in the proposal is a grass practice field with lights running parallel to Mountain Drive South.
The proposed grass practice field includes a swath of land running south of Goodman Drive. This section of land has a steep slope of 15%-25%.
This small section of land is also a medium level natural resource conservation priority area.

For these reasons, the LVPC recommends that the trees that run parallel Goodman Drive be maintained. Maintaining the trees would also have the added benefit of serving as a barrier to help shield the community on the opposite side of South Mountain Drive from the potential blight of light pollution from the proposed stadium/field lights and would support ‘Safe, Healthy, Inclusive and Livable Communities (Of Goal 5 page 111).
Karsts

Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources and the Geotechnical Investigation provided by the applicant indicates the extensive presence of karsts in the form of surface depressions on the site.

The LVPC advises the applicant to use strategies based on preserving pre-development hydrology and maintaining critical vegetated areas to minimize groundwater pollution and flooding. Green infrastructure techniques such as creating a buffer that creates a vegetated strip around the sinkhole area can slow runoff.

In addition, a variety of green infrastructure techniques can mitigate the impacts of stormwater runoff to this area. Some examples would be using rain barrels which can reduce erosion and adding green roofs. These techniques would ‘minimize environmental impacts of development to protect the health, safety, and welfare of the public’ (Policy 3.2).

Bicycle Amenities

The LVPC recommends the inclusion of bicycle racks for the parking lot at Cundey Varsity House and outside the Goodman indoor field house which will ‘enhance public transit service and pedestrian and bicycle infrastructure’ (Policy 2.3) and improve equitable access.

Stormwater Review

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.

Sincerely,

Bambi Griffin Rivera
Community and Regional Planner
cc: Lehigh University c/c Con Pasda, Applicant; Bohler Engineering PA, LLC. c/o Mike Jeitner, Project Engineer; Dean Severson, AICP; LVPC Director of Regional Planning; Geoffrey A. Reese, PE, LVPC Master Planner and Engineer; Steve Neratko, LVPC Chief Community and Regional Planner; Denjam Khadka, LVPC Senior Civil/Environmental Engineer
July 8, 2022

Mr. Robert Teel, Chair
Upper Mount Bethel Township Planning Commission
387 Ye Olde Highway
Mount Bethel, Pennsylvania 18343

RE: RPL Industrial Park – Sketch Plan
Upper Mount Bethel Township
Northampton County

Dear Mr. Teel:

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
  - July 26, 2022 at 12:00 PM
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The Upper Mount Bethel Township Subdivision and Land Development Ordinance (SALDO) requires that sketch plans be submitted to the Lehigh Valley Planning Commission for review (§301). This letter and its contents constitute an informal review of the overall proposal concept. The LVPC reserves the right to a formal review of the preliminary plans for each individual subdivision or development proposal related to this project as it moves forward.

The subject application is a Land Use of Regional Significance under FutureLV: The Regional Plan in the ‘Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator’ land use category. The site is on River Road, bounded by River Road to the northeast, Pine Tree Lane to the southeast and Potomac Street to the southwest, approximately 600 feet southwest of the Township border with Portland Borough (parcel numbers C12 6 1, C12 6 2, C11 26 2, C11 31 1, C11 31 1A, C11 31 3-5, C12 3 4, C12 3 5, C12 6 1A, C12 6 3-8, C12 8 1A, C12 5 6, D 11 5 1A 4 and D11 6 3).
The proposal conceptualizes the development of a planned industrial park on the southwest side of River Road consisting of 12 industrial buildings, totaling 5,873,000 square feet, on approximately 804 acres of land. A 420,000-square-foot industrial building shown on the plan northwest of the site is associated with this proposal and is located at 303 Demi Road (previously reviewed by LVPC in a letter dated May 28, 2021). A Master Plan Transportation Impact Study (TIS) was also reviewed for the project, dated January 2022. The TIS anticipates that 75% of the development will be filled by industrial park uses (a mix of manufacturing, services and warehousing), and 25% is anticipated to be high-cube fulfillment center warehousing. At full build out, the industrial park will generate an estimated 15,475 passenger car trips and 3,015 truck trips in a typical weekday.

The conceptual planned industrial park aligns with the Township’s designated General Industrial zoning district for the area (I-2), is in a Local Economic Revitalization Tax Assistance program (LERTA), and has the potential to provide numerous economic benefits to the Township and Lehigh Valley, including jobs and tax revenues.

However, the size and scale of the project significantly surpasses any existing development and infrastructure in the surrounding area. The LVPC has compiled numerous considerations, which range from site-specific design considerations to large-scale regional impacts, to support the Township in leveraging this development opportunity while minimizing adverse impacts on municipal character, infrastructure and quality of life, as well as the impacts to adjacent communities, meet the needs of the developer, and align with FutureLV: The Regional Plan.

The LVPC offers the following considerations to improve the long-term success of the proposal while promoting the fiscal health and sustainability of the Township (Policy 4.6) and to ‘strengthen freight mobility to minimize quality of life impacts to residents’ (Policy 2.4)

**Sewer Infrastructure**

The plan conceptualizes an on-site wastewater treatment plant. Historically, many municipalities have allowed development at a significant scale in rural areas based on the use of central sewage systems. In these cases, municipalities typically do not assume ownership or regulate the operation and maintenance of the facilities. Privately owned systems historically have not been operated as well as public systems, and are often neglected due to the high long-term costs of maintenance, leading to system failure and ultimately, take-over by municipal/regional sewer authorities. Municipalities are ultimately responsible for the proper functioning of all systems within their borders. For these reasons, the LVPC ‘discourages use of packaged sewage treatment plants’ (of Policy 3.2). In cases where a privately owned central sewage facility is approved by the municipality and the Pennsylvania Department of Environmental Protection (DEP), the municipality should assume ownership of the system to ensure proper long-term operation and maintenance. In the event these systems remain private, the municipality should require significant assurances for proper long-term operation and maintenance.

The availability of adequate sewer capacity is a necessary infrastructure component that will affect the long-term success of the project and its impact on the community. The planned industrial park is envisioned as including of a mix of industrial-type uses to support its
viability, and supports strengthening economic resilience (of Policy 4.2). Adequate sewer service is necessary to accommodate the scale of the proposal, especially to accommodate the intended various forms of industrial uses (of Policy 3.2).

Expanding collaboration on planning and development between neighboring communities is one way to ‘promote the fiscal health and sustainability of municipalities’ (of Policy 4.6). The LVPC encourages the developer and Township to continue to coordinate with Portland Borough to further explore possibilities to provide public sewer service to the project site. Connecting the planned industrial park development to public sewer and water service is in the best interests of all involved. The LVPC understands that the Township has had multiple conversations with Portland Borough on this subject and further engineering, to meet state and federal requirements, is needed so the Borough to consider sewer extension. The LVPC encourages the Township to work through these required engineering/permitting issues and to present these to the Borough, so everyone can fulfill their legal obligations and incorporate the necessary infrastructure to support public sewer connectivity at the time of land development ‘matching development intensity with sustainable infrastructure capacity’ (of Policy 1.1). LVPC believes that there is a once-in-a-lifetime opportunity to assure that a development of this scale is served accordingly for its operation and to ensure the public health, safety and welfare is protected. Working through public sewer extension issues, especially the technical requirements of state and federal laws will not be easy but is necessary. The emotion of the development itself should not interfere with the protection of water quality and availability now or in the future as a development of this magnitude, the largest in the Lehigh Valley, in decades and possibly ever, warrants a rational, measured approach now and for the future.

Internal Roadways
The design of a cul-de-sac on River Pointe Drive with no outlet poses a traffic safety concern. The single-access drive serves all 12 buildings and would be utilized by a mix of employee passenger vehicles and trucks. Two full access points would alleviate internal traffic circulation and congestion issues (of Policy 5.1). Marshfield Drive on the sketch plan is envisioned as an emergency access driveway, but provides an opportunity for a second full access driveway. This could create a loop from existing Marshfield Drive to connect to proposed River Pointe Drive, provide additional access points to future development sites and facilitate possible future transit service with easy turnaround in a safe and efficient manner (of policy 2.3).

The LVPC notes that responsibility for this emergency access is not identified on the plans, as Marshfield Drive is currently a municipal road. Marshfield Drive is 1.41 miles in length and identified as LR_ID 133128, LRS ID 307597 and Municipal ID 2240 on the Pennsylvania Department of Transportation (PennDOT) OneMap website. As the project moves into preliminary planning stages, the improvements, jurisdiction and continual maintenance of this roadway should be clarified. If the current location of Marshfield Drive is to be vacated, a street vacation petition must be initiated in coordination with any and all plan approvals, with review by LVPC per Pennsylvania Municipalities Planning Code requirements.

The wider interior sections of proposed River Pointe Drive should be clarified on the plans (see plan image below). These appear to be striped for truck parking, but are not labeled on
the plan set or described within the TIS. If the two wider areas are intended as truck parking spaces, they should be enhanced with truck parking amenities including trash and recycling receptacles, proper lighting, truck routing and information signage and electrical hookup infrastructure to minimize the need for diesel engines to be idling when parked. The availability of these potential parking spaces should not be used to eliminate truck driver lounges and amenities within the parking areas of future developments.

Emergency Access and Service
Two emergency access points are conceptualized, in addition to the main River Pointe Drive access road: current Marshfield Drive as previously discussed, and a long emergency access easement extending from the River Pointe Drive cul-de-sac to the southwest, connecting to Potomac Street. The conceptual building layout using long access driveways off a single roadway, with some buildings only accessible behind other buildings, essentially creates multiple flag lots (building 9, 4, 5A and 5B). This configuration poses safety concerns in the event of an emergency, especially considering the likelihood that multiple buildings may be up to 100 feet tall. The site must be configured in a way that prioritizes safe and efficient service by emergency response teams to protect the public health, safety and welfare. Should an incident occur along any of these long access driveways, or during maintenance of the driveway, vehicles would be trapped on site until resolved. Emergency response access will also be detrimentally hindered.

It is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).
An additional factor of consideration is the extent that this project affects the Township’s budget for emergency response personnel. Serving a development of this size and scale will ultimately require additional emergency service staff and equipment, and must be a factor of consideration when anticipating long-term fiscal impacts of this development (of Policy 4.6).

**Multimodal Transportation**

The vicinity of the project site lacks transportation options as alternatives to automobiles. Providing interconnected transit, sidewalk and trail infrastructure with strategically located pick-up and drop-off points is necessary for the workforce to be able to access jobs in this location, and is pivotal to the economic success of the development (of Policy 4.3).

Sidewalks are not currently conceptualized along the River Road property frontage. Considering the anticipated overall employees, vendors, services and truck drivers generated by the development, a robust multimodal network is absolutely crucial to ensure accessibility for all workers (of Policy 4.3). The Park and Ride lot located on River Road north of the Norfolk Southern Rail overpass is an opportunity for a transit service location. It is recommended that when a study is developed for any improvements to the functionality of River Road traveling under the Norfolk Southern Rail line, that the study investigate and include multimodal opportunities as a high priority. Pedestrian infrastructure must be in place to facilitate future transit connections, carpooling, biking and other multimodal access, which affects the ability for the workforce to access the site and thereby affects the marketability and occupancy associated with the development. Making the investment in multimodal infrastructure is in the best financial interests of the developer and greater community (of Policy 4.6).

Lack of public transit is a concern that should be coordinated with the owner of the current park and ride lot in Portland Borough, just north of the rail overpass on River Road.

**Trail Connectivity**

The LVPC commends the proposed onsite walking trail, which extends from near Potomac Street traveling northeast and then southeast through the site, with a total linear length of just under three miles. However, the trail ultimately makes a loop with no through-connection, though the beginning of the trail near Potomac Street indicates a potential walking trail extension to the Upper Mount Bethel Community Park.

The LVPC strongly recommends connecting the proposed walking trail to a pedestrian network along River Road. Upper Mount Bethel Township was studied for trail feasibility in the Two Rivers Area Greenway Trails Implementation Study (2009). Implementing trails and multimodal connectivity at the time of this development can facilitate future trail connections that will ultimately lead to an interconnected Slate Belt region (of Policy 5.3).
Limited Transportation Capacity
Transportation infrastructure capacity is limited in the vicinity of the project site and was not built to withstand high traffic volumes or heavy industrial vehicles. Vehicle traffic impacts are made worse by the lack of alternative transportation options. Ensuring that freight mobility is matched with appropriate infrastructure to accommodate it should occur prior to approving land development plans (of Policy 2.4).

- **Infrastructure Costs**
  Several critical issues are outstanding, including the rail overpass across River Road, and the need for a development management plan for the facility. The development management plan must formally designate and provide perpetual routing, signage and enforcement to ensure that the impacts of the development do not exacerbate existing or incited transportation safety and congestion concerns. These concerns are significant threats to the public health, safety and general welfare. If not addressed as the land development progresses, these threats will ultimately increase the burden to Township, Commonwealth, State of New Jersey, federal government, County, surrounding municipalities and others in the form of road and bridge upgrades and improvements, safety enhancements and transit needs. Transportation maintenance and improvements are paid for by all of these governments through taxes, which will need to increase over
time to address the burdens a development of this scale will have on public infrastructure such as the transportation system and emergency management services. This is not a limited issue, or one far in the future. It is immediate and prescient to the development itself. Real estate transfer taxes are one-time, liquid fuels revenues are declining due to vehicle fuel efficiency and transition to alternative fueling technologies, and wage and employment taxes depend on the number of jobs and their corresponding salaries. State and federal dollars to address transportation infrastructure are focused on highways and increasingly limited as the State Legislature struggles to meet federal match requirements. The potential for this development to pay for itself now or into the future is questionable, and understanding that public subsidy is limited or non-existent is an important factor to manage long-term impacts on the development itself and the public.

- **Rail Overpass**
  A Norfolk Southern rail line bridge crosses Delaware Avenue in Portland Borough (becoming River Road in the Township jurisdiction) located north of the project site. The current 13’ 8” clearance beneath this rail trestle poses a severe safety and mobility concern. All trucks must be directed to travel in this direction from the site, as the main access to both State Route 611 and Interstate 80 in New Jersey. Trucks get caught underneath or scrape the overpass multiple times per year, especially when road repaving reduces the amount of clearance underneath. The overpass in its current condition is not ideal nor in line with current design standards, considering the current standard maximum height of a commercial vehicle is 13’ 6” in Pennsylvania – a two-inch clearance. Ride height of the suspension of the chassis of trucks and trailers and road repaving with continual overlays can easily deviate three or more inches and would be detrimental to the integrity of the overpass if struck and compromise the safety of truck drivers. The plans and TIS do not indicate how this site access and mobility challenge will be addressed. Additionally, the bridge opening is too narrow for two tractor-trailers to pass through safely. Because of the roadway’s proximity to the Delaware River, and changing weather patterns as a result of climate change, this area is severely prone to flooding, and lowering the roadway to address clearance is not recommended. The LVPC strongly encourages the developer to continue exploring solutions to this issue, as well as continued dialog and coordination with the Township, Borough of Portland and PennDOT to study and engineer design alternatives to increase the overpass clearance to promote roadway safety and limit environmental impacts of development (of Policy 2.2 and 3.2). The LVPC recognizes this overpass as an obstacle that will severely limit the viability of the development. This is a practical matter that must be addressed or the development will not function.
• **Interstate 80 Access**
  Truck routes to Interstate 80 should be established and signed appropriately to provide safe and efficient freight movements (of Policy 2.4). The most efficient and least impactful travel route would be for truck and freight movements to cross the Delaware River at the Portland-Columbia Toll Bridge and connect to Interstate 80 in New Jersey. However, it is likely that trucks will utilize other roadways in the vicinity of the project site, and potential impacts to these roadways should be planned and mitigated.

• **Route 611 Impacts**
  The submitted TIS anticipates that 20% of trucks and 15% passenger vehicles generated by the project will utilize State Route 611, equal to approximately 452 additional trucks and 3,095 additional passenger vehicles traveling on State Route 611 per day.

While State Route 611 through and north of Portland Borough is truck-restricted, this restriction is only for 102-inch-wide twin trailers. 48-foot and 53-foot trailers, and 96-inch wide tractor-trailers, are legally allowed to drive on State Route 611. The PennDOT Trucker's Guide to Pennsylvania is available for more information: https://www.dot.state.pa.us/public/pubsforms/Publications/TruckersMap.pdf

State Route 611 is identified as a future 2040 Congested Corridor in the Congestion Management Process, available at https://www.lvpc.org/movelv-cmp.html. The level of development proposed will accelerate the anticipated traffic congestion along this corridor. Proper planning, design and improvements to the network can mitigate the impacts to the mobility in the area and improve air quality issues that result from traffic congestion corridor (of Policies 1.4, 2.2 and 2.4).

It is recommended that Upper Mount Bethel Township continually engage the Pennsylvania Department of Transportation (PennDOT) with a concurrent review of the Traffic Impact Study(s) for all projects envisioned for the River Pointe Logistics Planned Industrial Park. Those noted in the TIS include 303 Demi Road, RPL East Planned Industrial Park, The Anticipated Vacant Lot Development and Ultra-Poly Expansion. The
cumulative impacts these projects will have to the existing transportation network are massive once fully developed to the intended potential (of Policy 2.2 and 2.6).

The impacts to State Route 611 through Portland Borough and points north should be planned to be mitigated as more tractor-trailers utilize Route 611 as a northwestern “toll free” route to Interstate 80. The Portland Columbia Toll Bridge is “toll free” eastbound and will be the preferred route of trucks going to points into New Jersey via Interstate 80 eastbound and beyond. However, trucks wanting to travel west along Interstate 80, will be compelled to travel a route of no tolls along State Route 611 north to the Stroudsburg area of Interstate 80 thus avoiding the western toll at the Delaware Water Gap (I-80) Bridge. Currently the toll for a five-axle tractor trailer is $22.50 (of Policy 2.4).

State Route 611 through Portland Borough and northwards is another possible route for trucks, as a “toll free” route alternative to crossing the Portland-Columbia Toll Bridge. Trucks intending to travel west along Interstate 80 will avoid the $22.50 toll by traveling along Route 611 north to the Stroudsburg area of Interstate 80.

- **Route 512 Impacts**
  Route 512 off Route 611 traveling southwest towards Bangor and Pen Argyl boroughs is another likely route that trucks may utilize. Impacts to Route 512 should be identified and assessed to ‘consider the global effects of new or expanded freight businesses’ (of Policy 2.4) and minimize adverse impacts to these adjacent communities’ infrastructure.

- **Route 33 Access**
  Uhler Road through Forks Township and Main Street in Tatamy Borough will be impacted if trucks opt to travel further south on Route 611 to access Route 33. This is also a likely route for trucks traveling from the south to the development, by traveling from Route 22 to Route 33 and exiting at the Palmer/Tatamy interchange. Both state and locally owned roads in Lower Mount Bethel Township will also be affected.

- **River Road Impacts**
  River Road south of the project site, as well as any connecting local roads in Lower Mount Bethel Township, should be studied for impacts, particularly in consideration that some trucks may not be able to travel north due to the low-clearance rail bridge over River Road. The LVPC strongly recommends the site driveway exiting onto River Road be designed to eliminate the possibility of trucks making a right turn. Reducing the curve radius and lane widths should be explored, and ample signage should be provided restricting trucks from making a right turn.

**Future Building Lot Recommendations**
The LVPC recommends including essential truck driver amenities, including a driver lounge, overnight truck parking spaces and an electrified truck parking space. These amenities keep truck drivers safe and minimize quality of life impacts of freight on residents (of Policies 2.4).

Electric vehicles are the future of transportation, and commercial vehicles are now capable of running cab comfort heating and ventilation systems. Future building lots should provide overnight truck parking spaces with electrical hookups 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). Passenger vehicle parking lots should also incorporate vehicle charging station spaces to support the expansion of electric vehicles (of Policy 2.5).

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). Snow-clearing tools should be included in future preliminary plans to easily allow for truck drivers to clean off tractor-trailers and ‘provide a safe, well-maintained transportation network’ (Policy 2.2).

Truck queueing areas and pull-off areas must be provided for future buildings anticipated to have gated access, to prevent back-ups along River Pointe Drive.

**Landscaping and Sustainable Building**

As this proposal moves into the preliminary planning stage, landscaping and green spaces should be provided at each proposed building for the enjoyment of employees. Natural spaces provide benefits to mental and physical well-being, including reduced depression, anxiety and stress (of Policy 5.3). Connections between the conceptual walking trail and future building lots should be provided to allow employees and visitors opportunities to utilize the trail network. A small parking lot should be included at River Road and Pine Tree Lane near the eastern end trail loop, similar to the one located near Potomac Street.

The LVPC strongly recommends that the developer consider incorporating sustainable systems and green building design into future buildings. Sustainable utilities reduce overhead costs of operation and provide greater return on investment while ‘minimizing environmental impacts of development’ (Policy 3.1). The roof of buildings should be strong enough to accommodate solar panels, to enable renewable energy sources (of Policy 3.4). Incorporating sustainable systems and design supports the natural character and rural identity of the Township and offsets emissions generated by trucks to improve air quality (of Policy 3.4).

For more information about incorporating sustainability into industrial developments, please refer to the **LVPC High Cube and Automated Warehousing Community Guide** available at https://www.lvpc.org/c-guides---model-reggs.html.

**Environmental Impacts**

The project is in an area with an abundance of natural features including wetlands, riparian buffers, steep slopes and woodlands. While 59 acres of land have been identified as open space to be dedicated to the Township, the LVPC strongly recommends that the Township ensure the environmental impacts generated by the development are scrutinized, particularly impacts to critical habitats, to ‘minimize environmental impacts of development’ (Policy 3.2). Because of this proposal’s proximity to the Delaware River, a comprehensive environmental impact study may be required by the Northampton County Conservation District, Pennsylvania Department of Environmental Protection and/or the United States
Army Corps of Engineers, and municipal ordinances may require the same. A copy of any and all environmental impact assessments should be forwarded to LVPC at the same time as other regulatory bodies. This will ensure that county and regional planning and coordination occurs in conjunction with the development of the site in a nationally significant and environmentally sensitive area.

Additionally, the project site is in an area known for its scenery. River Road and Route 611 are scenic drives identified in the FutureLV Parks, Outdoor Recreation, Open Space and Scenic Plan, and the Delaware River is a federally designated Wild and Scenic River. The Township’s Community Park is also adjacent to the project site. The LVPC recommends that the Township require renderings of future proposed buildings from critical viewing points to assess what impact the development will have on the viewshed from the surrounding area, and to ‘promote development that complements the unique history, environment, culture and needs of the Valley’ (Policy 5.4).

The township clearly desires this development, as indicated by municipal zoning of the property. However, a development of this scale and impact must be thoughtfully and deliberately planned. For a project with such wide-ranging, the responsibility of the Township transcends the municipal land development approvals process affecting two states, multiple counties, the entire Slate Belt, adjacent regions and the Lehigh Valley.

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 the Slate Belt Multi-Municipal Plan to further ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4).

Sincerely,

Jillian Seitz
Senior Community Planner

Brian Hite
Transportation Planner

cc: Justin Coyle, PE, Upper Mount Bethel Township Engineer; Ed Nelson, Upper Mount Bethel Township Manager; Cindy Beck, Upper Mount Bethel Township Secretary; Tina Smith, Northampton County Director of Community and Economic Development; Stephanie Steele, Portland Borough Council President; Kay Bucci, Portland Borough Council Vice President; Heather Fisher, Portland Borough Mayor; Joseph Resta, Delaware River Joint Toll Bridge Commission; Mary Ellen DeFranco, Bangor Borough Mayor; John Couch, East Bangor Borough Council; Jennifer Smethers, Lower Mount Bethel Township Manager; Robin Zmoda, Pen Argyl Borough Manager; Paul Levits, Plainfield Township Planning Commission Chair; Thomas Petrucci, Plainfield Township Manager; Dan Wilkins, Portland Borough Planning Commission Chair; Cathy Martino, Roseto Borough Manager; Charles Dertinger, Washington Township Planning Commission Chair; Louise Firestone, Wind Gap Borough Administrator; Tina Serfass, East Bangor, Portland, Wind Gap Boroughs + Washington Township Zoning Officer; Molly Wood, LANTA Planner/Land Use Specialist; Derrick Herrmann, PennDOT District 5 Traffic Engineer; Cindy Kunnas, Delaware Greenway Partnership Executive Director; Dion Campbell, Northampton County Conservation District Director; Steve Walsh, PE, Dynamic Engineering Consultants
<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 Zoning Ordinance and Map Revision</td>
<td>Palmer Township</td>
<td>Palmer Township Comprehensive Zoning Ordinance and Map Revision – Proposes to revise the entirety of the Township’s Zoning Ordinance and Zoning Map.</td>
<td>Overall, the proposed changes to the Township Zoning Map advance several goals and policies of FutureLV: The Regional Plan related to protection of natural resources and open space and strategic development in Post-War Centers to accommodate growth and increase a variety of transportation options. The LVPC commends the Township for its proposed Zoning Ordinance and Zoning Map revisions that exemplify “evolution and adaptability of government” (of Policy 1.4).</td>
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<td>Application to Renew Approval of Existing Wastewater Treatment Plant and Discharge (DRBC Review)</td>
<td>Bath Borough</td>
<td>Application by Bath Borough Authority to renew approval of existing 0.51 million gallon per day wastewater treatment plant and discharge. The plant serves the Borough and portions of East Allen and Upper Nazareth townships.</td>
<td>Aligns with the FutureLV action to: Protect the quality and quantity of surface water and groundwater (under Policy 3.2). Per DRBC, no substantial adverse impacts are anticipated with continued operation.</td>
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<tr>
<td>Application to Renew Approval of Existing Spring Water Withdrawal (DRBC Review)</td>
<td>Lynn Township</td>
<td>Application by BlueTriton Brands to renew approval of existing spring water withdrawal of up to 9.3 million gallons per month (mgm) from applicant’s spring water sources. Project will continue to supply applicant’s bottled water facilities in Upper Macungie Twp. No increase in allocation proposed.</td>
<td>Aligns with FutureLV action to: Protect the quality and quantity of surface water and groundwater (under Policy 3.2). Per DRBC, no substantial adverse impacts are anticipated with continued withdrawal.</td>
</tr>
<tr>
<td>Application to Approve Modifications to Existing Wastewater Treatment Plant (DRBC Review)</td>
<td>City of Bethlehem</td>
<td>Application by Bethlehem City to approve modifications to existing 20 million gallon per day wastewater treatment plant. Modifications intended to improve treatment efficiency and performance of primary treatment process.</td>
<td>Aligns with FutureLV action to: Improve the utility and mobility infrastructure of the region (under Policy 1.1). Per DRBC, no substantial adverse impacts are anticipated with proposed modifications</td>
</tr>
<tr>
<td>Application to Renew Approval of Existing Surface Water Withdrawal and Expand Service Area (DRBC Review)</td>
<td>City of Bethlehem</td>
<td>Application by City of Bethlehem to renew approval of existing surface water withdrawal of up to 12 million gallons per day (mgd) from Tunkhannock Creek and 30.32 mgd from Wild Creek Reservoir. The City is proposing to expand service area with new interconnection in Lehigh Township to serve proposed Lehigh Valley Resort &amp; Spa. No increase in allocation proposed.</td>
<td>Renewal of existing surface water withdrawal aligns with FutureLV action to: Protect the quality and quantity of surface water and groundwater (under Policy 3.2). Proposed LV Resort &amp; Spa project designated as Exurban/Natural Resources in FutureLV, however, provision of water service aligns with action to: Match development intensity with sustainable infrastructure capacity (under Policy 1.1). Per DRBC, no substantial adverse impacts are anticipated with continued withdrawal.</td>
</tr>
</tbody>
</table>
Plan Activity

**Lehigh County**
- Reviews: 29
- Acres: 74.7
- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

**Northampton County**
- Reviews: 34
- Acres: 209.7
- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

**Regional Totals**
- 17 Subdivision/Lot Line Adjustments
- 22 Development
- 19 Stormwater Management
- 5 Municipal Ordinances and Maps
- **284.4 Acres**

* Includes preliminary and final plans

Types of New Development

**Housing: 509 Total Units**
- Single-Family Detached: 52
- Townhouses: 51
- Apartments: 406
- Planned Residential: 0
- Twins: 0
- Assisted-Living: 0
- Manufactured Homes: 0
- Condos: 0

**Non-Residential: 991,644 Total Square Feet**
- Commercial: 235,620
- Retail: 37,967
- Public/Quasi-Public: 103,610
- Industrial (Warehouse)*: 613,252 (W: 606,400)
- Office: 1,195
- Transportation: 0
- Agriculture: 0
- Recreational: 0

* Warehouse number is a subset of industrial total square footage

Location of Development

Year to Date

Plan Details and Previous Reports at lvpc.org/subdivisionreport.html
Non-Residential: 10,051,409 Total Square Feet

Commercial: 646,002
Retail: 118,837
Public/Quasi-Public: 727,425
Industrial (Warehouse)*: 8,468,120 (W: 8,302,710)

Residential: 2,968 Total Units
Single-Family Detached: 422
Townhouses: 444
Apartments: 1,870
Planned Residential: 0

Twins: 80
Assisted-Living: 110
Manufactured Homes: 0
Condos: 42

Location of Development
- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

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