LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, September 22, 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. Green Building United Sustainable Warehouse Partner Event
   a. Friday, September 23rd, 8:30 am to 11:30 am
   b. At Lafayette College, Rockwell Integrated Science Center
   c. Register: https://greenbuildingunited.org/events/sustainable-warehouse-forum

2. Eastern PA Greenways & Trails Summit
   a. Tuesday, September 27th & Wednesday, September 28th
   b. At State Theater in Easton, PA
   c. Register: https://delawareandlehigh.org/events/eastern-pa-greenways-trails-summit-3/

3. Pennsylvania Sustainability Summit
   a. Monday, October 3rd – Friday, October 7th
   b. Virtual Conference via Zoom
   c. Register: https://us06web.zoom.us/meeting/register/tZElceqtqzstGteZ9eNtAoh43jOf46wLZFvV

Minutes

1. ACTION ITEM: Minutes and Review of Roll Call Actions of the August 25, 2022, Commission Meeting (J B)

Comprehensive Planning Committee:

1. ACTION ITEM: City of Bethlehem, Lehigh County – Land Use of Regional Significance – Tower Place (DS)
2. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (DS)
Environment Committee:
1. ACTION ITEM: Environment Committee Summary Sheet (SR)

Transportation Committee:
1. INFORMATION ITEM: Next Committee Meeting on October 27th at 5:30 PM (KH)

Old Business:
1. INFORMATION ITEMS: Activity Reports:
   b. Highway Traffic Monitoring (BH)

New Business:
1. INFORMATION ITEM: 9th Annual LVPC Outlook and Awards (MA)
   a. November 15th from 8 AM to 10 AM @ Lehigh University Mountain Top Campus, Wood Dining Room
   b. Key data lead-up to revisions to FutureLV: The Regional Plan

Executive Director’s Report:
1. INFORMATION ITEM: Pennsylvania Municipal Planning Education Institute Partnership (BB)
   a. Train-the-Trainer for Community Planning
   b. 2022 Lehigh Valley Government Academy
      i. Community Planning – Wednesdays, September 7, 14, 21, 5:30-9 pm
      ii. Zoning – Thursdays, October 6, 13, 20, 5:30-9 pm

Communications and Education:
1. INFORMATION ITEM: Morning Call Business Cycle Column (MA)
   a. Our Passenger Train Journey
2. INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA)
   a. Aired Sept. 5 - The Challenges and Opportunities of Passenger Rail Service in the Lehigh Valley.
   b. Next show - Oct. 3 - Growth Management
3. INFORMATION ITEM: PennDOT Grant (MA)
   a. Traffic Signal Grant opportunity every municipality can use
4. INFORMATION ITEM: Local Technical Assistance Programs (MA)
   a. Sept. 27: Americans with Disabilities Act, 8 am to noon
   b. Sept. 30: Federal Highway Bikeway Selection Guide Workshop, 8 am to 11 am
   c. Oct. 4: Local Road Safety Plans, 8 am to noon.
   d. Oct. 6: Temporary Traffic Control, 8 am to 3 pm (In person at South Whitehall Township.)
   e. Oct. 25: ADA Transitions plans and Self Evaluation, 8 am to noon
   f. Nov. 1: Winter Maintenance, 8 am to noon.
Register for classes on the LTAP website gis.penndot.gov/ltap/ or call 800-FOR-LTAP or call Brian Hite at 610-264-4544.

Next Lehigh Valley Planning Commission Meeting:
Thursday, October 27, 2022, at 7:00 pm
LEHIGH VALLEY PLANNING COMMISSION
Minutes from the Thursday, August 25, 2022 Meeting

The LVPC held a virtual public meeting on Thursday, August 25, 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, Philip Ginder, Steven Glickman, Rick Molchany, Joyce Moore, Christina Morgan, Owen O’Neil, Kathy Rader and Kevin Schmidt.

**Northampton County**

Members Absent:

**Lehigh County**
Phillips Armstrong, Percy Dougherty, Kent Herman, Jamie Johnson, David Jones, Dennis Klusaritz, Stephen Repasch, Joshua Siegel, Matthew Tuerk and Irene Woodward.

**Northampton County**

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

Public Present: Kurt Bresswein, Jay Clough, Terry DeGroot, Arif Fazil, Christopher Haller and Jeff Ward.

COURTESY OF THE FLOOR
There were none.

CHAIRMAN’S REPORT
Mr. Glickman highlighted a Sustainable Warehouse Forum event that Green Building United is hosting on Friday, September 23rd from 8:30-11:30am at Lafayette College. He noted that the forum will look at the warehouse development in the region and then will explore opportunities to green these buildings. LVPC is a contributor to the forum and Mr. Glickman will facilitate the roundtable discussion.

MINUTES
Mr. Glickman stated that the minutes of the Thursday, July 28th, 2022 LVPC meeting are attached, and he then asked for a motion to approve the minutes. Mr. Elbich made a motion to approve the minutes. Ms. Cope seconded the motion. The motion passed, with Mr. Gallagher abstaining.

COMMITTEE REPORTS
Comprehensive Planning Committee:

**ACTION ITEM: East Allen Township – Land Use of Regional Significance – Route 329 Elementary School**

Mr. Severson provided an overview of the project, which conceptualizes the land development and construction of a 113,238-square-foot elementary school and a 36,172-square-foot administration building/education center with associated parking lots and school bus parking. Mr. Severson noted that this review is based on plans that were submitted on June 10th, 2022. Mr. Severson highlighted comments related to the conservation priority areas, farmland preservation, green infrastructure improvements, the presence of karsts, traffic calming measures, the location of an on-site playground and electric charging stations. Mr. Glickman called for a motion to accept the staff comments. Ms. Moore made the motion; Mr. Gallagher seconded the motion. Mr. Glickman asked for any comments or questions. Mr. Glickman asked for a minor wording clarification in the letter. Mr. Amato asked that the indigenous Lenape culture within the proposal property be protected. Mr. Charles Elliott asked about the acreage of farmland that is being lost due to the proposal and asked about the language used in the letter about farmland preservation. Mr. DeGroot, the engineer of the project, answered Mr. Amato’s question and ensured that the woodlands and the creek on the eastern portion of the site will not be disturbed. Mr. Amato asked if a screening for artifacts on the site will be done and Mr. DeGroot answered that a study was previously conducted on this site. Mr. DeGroot mentioned that the portion of the site that is being developed is about 78 acres of land that was previously farmland. He also mentioned that the site is conditionally zoned for school use, with approval granted by the Township. Mr. Charles Elliott asked if the letter could reference the loss of farmland and inconsistency with the policies of *FutureLV*. Mr. Fazil, an engineer representing the Northampton Area School District, noted that a plan outlining traffic patterns and certain safety concerns was provided to the Commission the day before. Ms. Bradley added that materials submitted after the review of the Comprehensive Planning Committee does not provide enough time for the Commission to perform an adequate revised review. Mr. Fazil reinforced that the location of the playground is safe and under the control of the School District. Mr. Glickman responded that Mr. Fazil’s specific comments cannot be added to the letter and asked Mr. Charles Elliott if he would like to add his comments to the letter. Mr. Charles Elliott asked if the specific acreage of farmland lost can be inserted in the Farmland Preservation section of the letter. Mr. Glickman called for an amended motion to accept the staff comments with Mr. Charles Elliott’s edits. Ms. Moore made the amended motion; Mr. Gallagher seconded the amended motion. Mr. Molchany asked if the site was in an Agricultural Security Area and Mr. DeGroot answered that it is not. Mr. Molchany clarified his comments on the Agricultural Security Area and farmland preservation. Ms. Bradley added that LVPC staff will check to see if the site is in an Agricultural Security Area and if it is, that can be added to the letter. Mr. Glickman asked for any comments or questions from the public. Mr. DeGroot added that a traffic impact study was completed and reviewed by LVPC and mentioned the traffic safety measures included on and around the project site. Motion passed, with Mr. Amato abstaining.

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

Mr. Melnick presented the Comprehensive Planning Committee Summary Sheet, which included a Lowhill Township Zoning Ordinance Amendment and the Northern Lehigh Multi-Municipal Comprehensive Plan. Mr. Glickman called for a motion to accept the staff comments on the summary sheet. Mr. Molchany made the motion; Ms. Dreisbach seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

Environment Committee:

**ACTION ITEM: Environment Committee Summary Sheet**

Ms. Morgan presented the Environment Committee Summary Sheet, which included two Solid Waste Permit Renewal Applications in Lehigh and Weisenberg Townships, as well as a Sewage Facilities Planning Module for North Whitehall and South Whitehall Townships. Mr. Glickman called for a motion to accept the staff comments on the summary sheet. Mr. Melnick made the motion; Mr. Brace seconded the motion. Mr. Glickman asked for any comments or questions. There were none. Motion passed.

Transportation Committee:
INFORMATION ITEM: Pennsylvania State Plan for Electric Vehicle Infrastructure Deployment
Ms. Bradley presented information on the National Electric Vehicle Infrastructure (NEVI) State Deployment Plan. She outlined how much funding would be available and where it would go, with Pennsylvania set to receive $171.5 million over a 5-year period. Ms. Bradley discussed the three levels of Electric Vehicle (EV) charging that are available, as well as the three charger connector types that are used in electric vehicles. She discussed the Alternative Fuel Corridors (AFC) that are designated as “ready” or “pending” within Pennsylvania and the Lehigh Valley. Ms. Bradley also outlined the schedule for the acceptance of the NEVI State Deployment Plan by the US Department of Transportation. Mr. Amato asked for any comments or questions. Mr. Melnick asked if the highest-level charging increases the mileage that the car can drive per charge and Ms. Bradley answered that it depends on the battery storage capacity within the vehicle. Mr. Glickman asked if the vehicles discussed included trucks and freight vehicles and Ms. Bradley answered that it included both. Ms. Morgan asked about the life of electric batteries and the disposal of them, and Ms. Bradley responded. Mr. O’Neil mentioned the issues of range and fueling for electric transit vehicles, such as buses. Mr. McGorry discussed California’s recent mandate to ban the sale of new gasoline-powered cars by 2035. Mr. Molchany reinforced the purpose behind the NEVI State Deployment Plan.

INFORMATION ITEM: LVTS Kicks-off Lehigh Valley Passenger Rail Analysis
Ms. Bradley provided an update on the kick-off of the Lehigh Valley Passenger Rail Analysis by the Lehigh Valley Transportation Study (LVTS) and the Pennsylvania Department of Transportation (PennDOT). She summarized the most recent LVTS meetings where PennDOT Deputy Secretary Jennie Louwerse spoke about the consideration of passenger rail systems and offered to work with the LVTS to pursue a passenger rail analysis that will meet federal standards. Ms. Bradley described the partnership between PennDOT and the LVTS and added further details on the Analysis. She also provided information on the differences between freight rail, commuter rail and intercity passenger rail. She explained that the Lehigh Valley Passenger Rail Analysis will determine what the potential for passenger rail service is, as well as look at potential routes and rail implementation partners. Ms. Bradley emphasized that the costs will be high, that the system planning is highly detailed and that the expected timeline is at least a decade or more should the LVTS and Commonwealth decide to proceed with implementation after the analysis is complete. Mr. Molchany added that the Analysis will also look at opportunities for climate action and the land use implications of passenger rail service. He also mentioned the amount of LVTS projects that are unfunded in the 25-year plan. Mr. O’Neil emphasized that the Analysis will estimate build costs and operational costs on an on-going basis. Ms. Bradley mentioned the potential land use implications that can happen as a result of passenger rail in the Lehigh Valley. Mr. Amato asked for any additional comments or questions and concluded the Transportation Committee report.

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 July, which included 18 Subdivisions, 35 Development proposals, 21 reviews for Stormwater Management, and five Municipal Ordinances and Maps for a total of 79 reviews. The reviews included 311 housing units and 6,946,596 square feet of non-residential development, consisting largely of the River Pointe Logistics proposal in Upper Mount Bethel Township. Mr. Glickman asked for any comments or questions. There were none.

Highway Traffic Monitoring
Ms. Bradley provided the details of the July traffic counts, which shows our normal mid-summer uptick in traffic across all four of our continuous traffic counters collecting volume data. She presented the vehicle counts for State Route 33, Interstate-78, State Route 309 and State Route 22, as well as the truck counts for Interstate-78 and State Route 22. Ms. Bradley noted that Route 22 has more overall vehicles per day than Interstate-78, but Interstate-78 has more overall commercial trucks. Mr. Glickman asked for any comments or questions. There were none.
New Business:

**INFORMATION ITEM:** Regional Broadband Analysis
Ms. Bradley discussed LVPC’s Regional Broadband Analysis. She first highlighted a panel, hosted by Congresswoman Susan Wild, that LVPC was a part of that centered on internet accessibility and the broadband network. Ms. Mackey presented maps that displayed the median download and upload speeds for zip codes within the Lehigh Valley and discussed the internet speeds of certain areas. Ms. Bradley discussed the importance of the maps and the data on broadband in the region for future investments. Mr. Glickman asked for any comments or questions. Mr. Molchany underscored the importance of broadband access as an equity issue and how this information impacts future grant requests. Mr. Glickman asked if *FutureLV* referenced internet infrastructure and Ms. Bradley responded. Mr. Glickman added how important internet access is and will be for future developments of any kind within the region.

Executive Director’s Report:

**INFORMATION ITEM:** 9th Annual LVPC Outlook and Awards
Ms. Bradley announced that the 9th Annual LVPC Outlook and Awards, previously known as the Gala, will be held on November 15th from 8:30 – 10:30AM at the Lehigh University Mountain Top Campus. She provided a preview of what the event will entail. Mr. Glickman asked for any comments or questions. There were none.

Communications and Public Engagement:

**INFORMATION ITEM:** LVPC part of National Expert Roundtable
Mr. Assad informed that the LVPC was part of a panel of national experts on how the Federal Infrastructure Law will help bring a greener future. It was an hour-long discussion on how the future of urban infrastructure is being driven by two trends - digital and data driven technologies, and the move to decarbonize our urban centers. He mentioned that the panel included LVPC’s Becky Bradley, Siemens USA CEO Barbara Humpton, SEPTA Chief Innovation Officer Emily Yates, Port Authority of New York and New Jersey Executive Director Rick Cotton and Regional Plan Association CEO Tom Wright. The panel was viewed by people across the world, and you can find it currently streaming on YouTube by searching ‘CityAge’ and ‘How the Bipartisan Infrastructure Bill Can Drive a Clean Energy Future’.

**INFORMATION ITEM:** Business Cycle Column
Mr. Assad summarized the most recent Business Cycle column that was published in the Sunday, July 31st Morning Call. That column focused on one of the nation’s largest expanses of land, our public right-of-way, and looks at what the public-right-of-way means to us, how it’s used, and in some cases misused. He stated that the next column is scheduled to publish September 11, 2022 and will focus on the passenger rail analysis being done for the Lehigh Valley, with all of its excitement and many obstacles.

**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 Owen O’Neil, Executive Director of LANTA. The show discussed LANTA’s burgeoning enhanced bus services and how fast convenient bus services is key to our future development plans. He stated that the next show was scheduled to air at 6:30 pm, September 5th and will focus on development in the first seven months of the year and growth management.

**INFORMATION ITEM:** 2022 Lehigh Valley Government Academy
Mr. Assad reminded the Commission that the Lehigh Valley Government Academy Classes are currently running throughout 2022, including Community Planning on September 7, 14 & 21 and Zoning on October 6, 13 & 20. He noted that the Community Planning class is full, while there are a few seats open in the Zoning course. Anyone can sign up online at lvpc.org/lvga.
**INFORMATION ITEM: PennDOT Grant**
Mr. Assad announced that PennDOT is about to open a $5 million Traffic Signal Technologies Grant Program that municipalities can use to upgrade their existing traffic signals, including everything from improving the timing of traffic signals, to synchronizing a corridor of lights and even making the signal system adapt to traffic as it changes. He informed that this is a one-time grant program, with no local match required, that opens September 1 and runs through September 30, 2022. More information can be found by searching ‘PennDOT Traffic Signal Portal’ on the web.

**INFORMATION ITEM: Local Technical Assistance Program**
Mr. Assad announced that the Local Technical Assistance Program has a full schedule of classes coming up through the end of 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 September 22\textsuperscript{nd}. 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
September 9, 2022

Ms. Darlene Heller
10 E. Church Street
Bethlehem, PA 18018

RE: Tower Place – Land Use of Regional Significance
City of Bethlehem
Lehigh 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
  - Tuesday, September 20, 2022 at 12:00 PM
  - https://lvpc.org/meetings.html
- LVPC Full Commission Meeting
  - Thursday, September 22, 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 ‘Office Buildings Land Use Category’. This proposal is the first part of a phased development at 1170 8th Avenue (parcel number 642821984933 and 642821195996). It conceptualizes subdividing the 52.67-acre parcel into three separate lots, to redevelop the Martin Tower site, constructing two three-story medical office buildings, parking, and associated facilities totaling 101,821 square feet on two of the lots with the third lot to be developed in the future.

The LVPC offers the following comments:

**Reuse and Redevelopment in Urban Areas**
The location of this development proposal supports reuse and redevelopment within an urban area (Policy 1.1). With a view to ‘Encourage quality, sustainable design and construction’ (of Policy 1.2), the LVPC suggests that some aspects of the design could
be modified to support the overall goals of both FutureLV: The Regional Plan and the City of Bethlehem.

This development possesses a unique opportunity to incorporate sustainable designs that would complement the character of the area while minimizing environmental impacts. One opportunity is through sustainable and enhanced parking lot design which combines abundant vegetation, pervious paving materials, safe pedestrian, cyclist and ADA access, as well as, connections to transit. This is especially important in an urban environment where there is existing density paired with new development.

If possible, the addition of ample vegetation and pervious materials would help to ‘Reduce climate change impacts through mitigation and adaption’ (of Policy 3.4) and provide alternative measures of stormwater management. Landscape diversity throughout parking lots breaks up monotony and creates visual interest. Landscaping can be used to interrupt large impervious expansions. This is both visually appealing and helps to mitigate the heat island effect which is created because parking lots emit the sun’s heat more than natural landscapes do. Additional landscaping could help to protect the nearby Monocacy Way Trail, Burnside Plantation, existing tree cover on other portions of the site and Monocacy Creek itself and would ‘match development intensity with sustainable infrastructure’ and ‘encourage quality, sustainable design and construction’ (of Policies 1.1 and 1.2). This also, would help to create quality, sustainable design, and construction (of Policy 1.2) and would ‘minimize environmental impacts of development to protect the health, safety, and welfare of the public’ (of Policy 3.2).

The LVPC applauds the inclusion of street trees along 8th Avenue and Eaton Avenue which supports Policy 5.3 to ‘Promote street trees’.

**Connectivity**
This location offers an excellent opportunity to incorporate multimodal transportation and universal design to create space that will be accessible to all modes of transportation in an area with high pedestrian and transit use. The LVPC commends the addition of sidewalks that will connect with the existing sidewalks around the parameters of the development along 8th Avenue and Eaton Avenue.

The proposal does not link the sidewalk network into the complex across the parking lots, however. The LVPC recommends that, in addition to including continuous sidewalks on the outside parameters of the development, pedestrian walkways be included in and around the interior of both parking lots. This would ‘Ensure transportation accessibility for all persons, ‘Improve connections between bus stops and pedestrian and bicycle infrastructure’ (of Policy 5.2), and create an accessible area that is well connected for access by everyone.

Planning for safe pedestrian circulation within the development is important for employees and patients including those who will be accessing the facilities via one of the bus stops located along 8th Avenue and using the sidewalk network as part of their transportation route. This will support pedestrian safe access through the parking lots to
the building entrances and ‘Strengthen sidewalk, bike route and trail infrastructure’ (Policy 5.3)

The LVPC recommends that clearly marked crosswalks be added or improved at the following intersections that will lead into and bring foot traffic to and from the development: The intersection of 8th Avenue and Eaton Avenue covering all four directional crossings, at the proposed connection from Plaza Drive crossing 8th Avenue and from Martin Court, crossing 8th Avenue to Martin Tower Road, and at the proposed road access coming off Eaton Avenue.

The Lehigh and Northampton Transportation Authority (LANTA) operates public transportation service to the project with two northbound bus service stops along the frontage along 8th Avenue and a third southbound at the 8th Avenue and Martin Court intersection.

A 10-feet by 8-feet concrete shelter pad fronting the sidewalk as well as a five-foot concrete pad in between the existing sidewalk and the curb for a proper American with Disabilities Act (ADA) compliant landing pad should be added to each of the two existing bus stops running northbound along 8th Avenue. This will allow both employees and patients using public transportation to easily board and descend with full ADA clearances. This would improve equitable access to jobs by means of ‘improving mixed-transportation access to areas with high or growing employment opportunities’ (of Policy 4.3).

The LVPC urges adding bus shelters with seating and trash receptacles to the two northbound service locations along the property frontage on 8th Avenue. The LVPC strongly encourages continued early engagement with LANTA to discuss these bus stop recommendations. LANTA Planner/Land Use Specialist Molly Wood can be contacted by e-mail mwood@lantabus-pa.gov or by phone at 610-776-7433 x165.
**Additional Amenities**
The LVPC commends the inclusion of streetlights that incorporate design elements that are consistent with streetlights used by other developments in this area which ‘Promotes context-specific design solutions’ (of Policy 5.4) as well as public safety.

Outdoor seating should be incorporated into the design for patients and staff. This is especially important as the proposed developments are intended for medical uses and those coming in and out of the buildings may require a sitting area. Having seating available outside supports ‘Safe, Healthy, Inclusive and Livable Communities’ (Goal 5) which ‘reduces depression, anxiety, and stress’ (Healthy Communities Theme). An example of an outdoor sitting space that would provide both seating and additional green space can be seen below.

![Outdoor seating](image)

**Bicycle Amenities**
The LVPC commends the inclusion of bicycle racks on the building sites which will improve equitable access to jobs by improving ‘mixed-transportation access to areas with high or growing employment opportunities’ (of Policy 4.3) and supports the goal to ‘enhance public transit service and pedestrian and bicycle infrastructure’ (of Policy 2.3).

**Electric Charging Spaces**
Electric charging should also be planned for and integrated into both passenger vehicle parking lots to plan for the future of electric vehicles (Policy 2.5). Most vehicle manufacturers are eliminating internal combustion vehicle production within the next decades and a very high priority has been placed on transition to an alternative fueled vehicle future by the federal government through the Bi-Partisan Infrastructure Law. The Commonwealth of Pennsylvania has released a complementary plan to advance national and regional goals, as well. Furthermore, addition of electric vehicle charging supports the implementation of City’s Climate Action Plan. Consideration of this opportunity to serve customers and improve air quality over time is appreciated.

**Transportation Impact Assessment**
The land development plans submitted to the LVPC dated August 3, 2022, were for two medical office buildings, of 60,827 square feet and 38,339 square feet. The Traffic Impact
Assessment submitted was for the entirety of a proposed urban mixed-use project. The full project, according to the Traffic Impact Assessment, is to include 100,000 square feet of medical office building(s), 85,000 square-feet of general office, 24,000 square-feet for a grocery store, 5,585 square feet of convenience store/gas station with 16 vehicle fueling pumps, a 6,500-square-foot high-turnover sit-down restaurant, a 130-room hotel and 312 mid-rise apartments. The LVPC Transportation review attempted to parse out the Medical Office Buildings from the overall Assessment submitted.

The Transportation Impact Assessment should be a Transportation Impact Study based on the scale of the project and daily vehicle trips anticipated to be generated. The developer has noted within the Assessment that they will provide interim transportation studies as development phases and areas of the site develop, to evaluate the impacts on the surrounding roadway network. The Traffic Impact Assessment often states that it is a study. The developers engineering team should clarify the context and recommendations of the transportation planning of the developer as to either a Traffic Impact Assessment or a Traffic Impact Study and most importantly, what the anticipated effect of this phase of development is as it relates to the Master Site Plan. This will provide needed context and allow for successive phases of the develop to be coordinated.

**Vehicle Trip Data**

The Traffic Impact Assessment utilized the Institute of Transportation Engineers 10th edition *Trip Generation Manual*. The Institute of Transportation Engineers has an 11th edition of the *Trip Generation Manual* that should be utilized for Transportation Impact Assessments/Studies as it offers the most current and comprehensive trip generation analysis.

The Executive Summary of the Assessment states that the mixed-use project, when fully developed, will experience a total of 13,983 weekday trips and that the medium volume driveway opposite Plaza Drive will produce 2,518 weekday trips, while the high-volume driveway at Martin Tower Road is expected to produce 7,954 trips per weekday. It does not explain where the remaining 3,511 weekday trips will come from. There is no mention of the right in/right out driveway or Tower Drive trip distribution along Eaton Avenue within the Executive Summary.

The LVPC recommends updating the Executive Summary to reflect all access trip distributions resulting from the development of the two Medical Office Buildings. The Executive Summary should account for any phases for the project and the expected timeline for construction. Ultimately the Pennsylvanian Department of Transportation has ownership of 8th Avenue (State Route 8011) and Schoenersville Road (State Route 1009). Trip distribution, trip generations and phases should be clearly defined within the Executive Summary of the Assessment especially for the impacts to Eaton Avenue.

Traffic Turn Movement, Headway Calculations, Capacity and Queue Analysis data contained within the Assessment was collected in November 2020 and from March to
June 2021. Traffic volume data was collected from November 13 through the 20th, 2020 utilizing Automatic Traffic Recorders.

Traffic data collection during the 2020 and 2021 timeframes are considered by the Pennsylvania Department of Transportation (PennDOT) as traffic data potentially being lower than normal due to the COVID-19 Pandemic. While there are COVID adjustments provided in the amount of 15% within the Assessment, this may not reflect current conditions. It is recommended that the developer’s transportation engineering team conduct new traffic data collection and update the Assessment to reflect the current conditions of 2022 along the 8th Avenue, Eaton Avenue corridors and other studied intersection and roads. In general, the LVPC’s traffic monitoring throughout the region has found that trip generation has returned to or now exceeds pre-Pandemic levels.

Eaton Avenue to the east of 8th Avenue is a congested corridor as identified in the Congested Management Process. This congested corridor ends at the intersection of 8th avenue and Eaton Avenue. This intersection with the proposed development should be analyzed to determine the best practices to help mitigate the congestion that will be exasperated by the development. It should be noted that this corridor was identified in the Congested Management Process documents after the former Martin Tower was essentially vacant, so the former usage of Martin Tower did not resolve or mitigate congestion with its closure in 2007. Mitigation of the incremental development transportation impacts along this corridor should be coordinated with the PennDOT to provide future strategic improvements at key locations, including the intersection of Eaton Avenue and 8th Avenue which will ‘Reduce transportation related emissions’ (of Policy 2.2)

**Construction Phasing Plan**
The LVPC recommends that the developer construct all transportation improvements suggested within the Conclusion Segment of the Assessment or update the Assessment to be a Traffic Impact Study and propose timing of the improvements as each element of the urban mixed-use development is constructed. Phasing of projects of this scale can be a challenging endeavor. However, the impacts to the surrounding community can be more challenging if the transportation network is not aligned with the construction being done, in the phase when it is being done. A clearly defined development and transportation network phasing plan is vital to mitigating the impact on the surrounding community during the construction phase if done incrementally.

**Character-Defining Areas**
Character-Defining Areas represent the natural and scenic character of the Lehigh Valley and are recommended for parks and open space, woodlands, agriculture, and low-intensity, limited-scale development that preserves natural and scenic resources.

The eastern section of this parcel has woodlands, which are part of a larger character-defining area. Woodlands mitigate environmental stress by reducing stormwater runoff, filtering groundwater recharge, controlling erosion and sedimentation, moderating local
microclimates, and purifying the air. Protecting and managing the region’s woodland resources is a goal of FutureLV: The Regional Plan.

This current stage of the proposed development is not directly within this character-defining area, however, because of the proximity to it the LVPC strongly encourages that environmentally sustainable practices be employed throughout the development process to protect this area.

Steep Slopes
The outside parameters of this parcel contain steep slopes of 25%. This is outside of where development is currently proposed. The LVPC recommends that large lots with low site coverage standards should be maintained, and special erosion and storm drainage controls enforced to ‘Minimize environmental impacts of development to protect the health safety and welfare of the public.’ (of Policy 3.2)

Karsts
The mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the presence of surface mines on the site. The LVPC advises the applicant to ensure proper Geotech testing before any land development, to ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (of Policy 3.2).

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

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
Teresa Mackey  
Senior Environmental Planner

Brian Hite  
Transportation Planner

Denjam Khadka  
Senior Civil/Environmental Engineer

Geoffrey A. Reese, PE  
Master Planner and Engineer

CC: HRP Management, LLC, Applicant; Pennoni Associates, Project Engineer/Surveyor; SWB L.R. LTTD., HMLP-MT, LIMITED PARTNERSHIP RMLP-MT, LP 8TH 7 EASTON HOLDINGS, LP c/o The Herrick Company, Inc.; Dean Severson, AICP, LVPC Director of Regional Planning; Geoffrey A. Reese, PE, LVPC Master Planner and Engineer; Denjam Khadka, LVPC Senior Civil/Environmental Engineer, Steve Neratko, LVPC Chief Community and Regional Planner
MEMORANDUM

DATE: September 20, 2022
TO: LVPC Commission
FROM: Becky Bradley, Executive Director at the request of the LVPC Comprehensive Planning Committee

CC: Darlene Heller, City of Bethlehem
RE: Tower Place – Land Use of Regional Significance
City of Bethlehem

The Comprehensive Planning Committee of the Lehigh Valley Planning Commission met on September 20, 2022. The Committee discussed the opportunities for recommendations for green building design to be included in the recommendations but, moved the letter forward to the Full Commission as written.

A county planning commission’s role under the Pennsylvania Municipalities Planning Code does not extend to the building design, only to site design. The Commission obviously, supports environmentally-sensitive design regardless of the relationship to site design or building design. It is of note that building design is regulated under a series of laws including the statewide building code, zoning code and any historic district regulations. These, later statutes are the purview of the local government, in this case the City of Bethlehem.

The Committee supported a conversation between the LVPC and the City of Bethlehem to work towards a possible language addition for consideration at the Full Commission, supporting the congenial dialogue of mutual support during the meeting. The following is language that the LVPC and City of Bethlehem communicated after the meeting for consideration for addition to the letter regarding the Tower Place proposal:

"The LVPC supports the City of Bethlehem’s goal of a sustainable and climate resilient community. This City goal is consistent with FutureLV: The Regional Plan. The LVPC further supports the City as it works with the developer of the Tower Place site to include green infrastructure and building technologies."

Thank you for your consideration of this addition to the letter.
<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning Ordinance Map Amendment</td>
<td>Bethlehem Township</td>
<td>Rezoning a track of land located at the intersection of Freemansburg Avenue and Wagner Drive containing approximately ten acres of land by adding the mixed-use overlay district designation.</td>
<td>This amendment demonstrates ‘evolution and adaptability of government’ (of Policy 1.1). It supports ‘increasing density of residential and mixed-use development in centers’ (of Policy 1.2) and supports an efficient development process that is responsive to regional needs (Policy 1.4).</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>Williams Township</td>
<td>Amendment requiring a letter indicating approval of the permit application by a Homeowner’s Association or Condominium Association, if the property is subject to a relevant association.</td>
<td>The LVPC encourages the Township to reconsider including this provision as a requirement of the zoning application. In an instance where association restrictions are deemed unenforceable, and a zoning application is denied due to lack of an approval letter from the association, the Township may become embroiled in a legal situation. An alternative approach may be to amend the application form or submission instructions to provide a statement for the applicant to acknowledge that the property may be subject to other legal restrictions, and are advised to conduct a title search for such documents as a best practice (of Policy 1.4).</td>
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## Project Review Summary Sheet

<table>
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</tr>
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<tr>
<td>Residual Waste Permit Modification Application (Act 97 Review)</td>
<td>Wilson Borough</td>
<td>Flaw Inc (d/b/a Recycle Oil Company) operates existing waste oil collection, processing and recycle for resale facility at 1600 South 25th Street. Applicant proposes to increase waste storage capacity from 100,000 gallons to 140,000 gallons. No other changes proposed with this application.</td>
<td>Permit modification aligns with FutureLV: The Regional Plan action to: “provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling” (under Policy 3.2). PA Department of Environmental Protection performs technical review of application.</td>
</tr>
<tr>
<td>Municipal Waste Permit Modification Application (Act 97 Review)</td>
<td>Lower Saucon Township</td>
<td>Bethlehem Landfill Company operates 201-acre landfill located at 2335 Applebutter Road. Applicant proposes to expand landfill (Northern Realignment project) entirely within footprint of previously permitted property line and facility limits, increasing landfill life by about 3.2 years. Landfill will be expanded overtop about 37 acres of existing fill area and laterally over about 4 acres of new disposal area previously approved for support activities. No change in permitted daily tonnage proposed.</td>
<td>Permit modification aligns with FutureLV: The Regional Plan action to: “provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling” (under Policy 3.2). LVPC land development review 9/9/20 found project generally consistent with FutureLV. PA Department of Environmental Protection performs technical review of application.</td>
</tr>
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</table>
Sustainable Warehouse Forum

Fri, 9/23/2022 - 8:30am - 11:30am
Rockwell Integrated Science Center, Lafayette College, 730 High St, Easton, PA 18042
2022 EASTERN PA GREENWAYS & TRAILS SUMMIT

September 26-28, 2022
State Theatre, Easton, PA

Register today!
REGISTER TODAY!
Hosted By PA GREENGOV COUNCIL
October 3rd - 7th
SCAN TO LEARN MORE
9th Annual Lehigh Valley Outlook + Awards

November 15th 8 AM – 10 AM
Lehigh University
Iacocca Conference Center, Wood Dining Room
Pennsylvania Municipal Planning Education Institute

Community Planning
5:30-9 pm
September 7, 14 & 21

Zoning
5:30-9 pm
October 6, 13 & 20

Register @ lvpc.org/lvga
PA Traffic Signal Technologies Grants

- Grants to Improve or Upgrade Traffic Signals
- No match needed
- Application Period - September 1 to September 30

https://www.dot.state.pa.us/public/Bureaus/BOMO/Portal/TSPortal/index.html
Local Technical Assistance Program Virtual Classes

- Sept. 27: Americans with Disabilities Act (ADA), 8 am to noon
- Sept. 29: Equipment and Worker Safety, 8 am to noon
- Sept. 30: Federal Highway Bikeway Selection Guide, 8 am to 11 am
- Oct. 4: Local Road Safety Plans, 8 am to noon
- Oct. 6: Temporary Traffic Control, 8 am to 3 pm, (in-person at S. Whitehall)
- Oct. 25: Americans With Disabilities Transitions Plans, 8 am to noon
- Nov. 1: Winter Maintenance, 8 am to noon

Register for classes on the LTAP website gis.penndot.gov/ltap/ or contact Brian Hite at bhite@lvpc.org or by phone at 610-264-4544