



Lehigh Valley Planning Commission

STEVEN GLICKMAN
Chair

CHRISTOPHER AMATO
Vice Chair

KEVIN SCHMIDT
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, November 15th, 2022, 12:00 noon
AGENDA

Roll Call

Ordinance/Plan Reviews and Information for November 2022:

1. *ACTION ITEM*: Lower Mount Bethel Township – Comprehensive Plan 2022 (SN)
2. *ACTION ITEM*: Lower Mount Bethel Township – Official Map (SN)
3. *ACTION ITEM*: Lower Saucon Township – Zoning Ordinance and Map Amendment – Landfills and Waste Disposal Facilities (JS)
4. *ACTION ITEM*: Moore Township – SALDO Amendment – Miscellaneous (BGR)
5. *ACTION ITEM*: Williams Township – Zoning Ordinance Amendment – New Use for Self-Storage Facilities (SN)
6. *ACTION ITEM*: Lynn Township – Zoning Ordinance Amendment – Non-Agricultural Dwellings in Ag Preservation (DS)

Other Business:

1. *INFORMATION ITEM*: Northampton County Freight Land-Use Project Draft Guide (DS, SN, BB)

Next Comprehensive Planning Committee Meeting:
December 20, 2022 at 12:00 pm



Lehigh Valley Planning Commission

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BECKY A. BRADLEY, AICP
Executive Director

November 8, 2022

Mr. Patrick McInerney, Chair
Lower Mount Bethel Township Planning Commission
Municipal Office, P. O. Box 257
Martins Creek, Pennsylvania 18063

**RE: 2022 Comprehensive Plan Update
Lower Mount Bethel Township
Northampton County**

Dear Mr. McInerney:

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
 - November 15, 2022 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - November 17, 2022 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The proposed 2022 Lower Mount Bethel Township Comprehensive Plan is an update to the 2006 Comprehensive Plan and serves to promote several goals and policies outlined in *FutureLV: The Regional Plan*. While the Township continues to be part of the Plan Slate Multi-Municipal Comprehensive Plan, and will remain part of that process, the need to update the official map required an immediate update to the plan, therefore it is logical that this plan is an update rather than a completely new proposal.

The municipality is facing development pressure, and the proposed Lower Mount Bethel Township Comprehensive Plan's major goals include protecting farmlands, open space, natural and cultural resources, and balancing preservation, and development. Additionally, the plan meets all legally required criteria outlined in the Pennsylvania Municipalities Planning Code for Comprehensive Plans. The Plan describes current conditions and provides a vision for the area's future with thorough, in-depth, and well-researched plan content. In addition to outlining the vision for the future, the LVPC commends the inclusion of innovative tools and practices that address the modern-day

needs of the region, as well as future forces, demonstrating the use of best practices in development patterns and community growth (Policy 1.4 *FutureLV*).

Natural Resources

The LVPC commends the municipality on comprehensively identifying natural resources and discussing their conservation and development issues (of Policies 3.1 and 3.2), such as additional testing requirements and possible buffers in carbonate topography areas.

The LVPC recommends the Township adjust the wording to be consistent among the following references related to steep slopes in Chapters 2, 5 and 9. In the Natural Resources section, page 2-13, the text states that ‘...consists of slopes 15 percent or greater. These slopes are prohibitively steep for land development and should be left undisturbed.’ In Chapter 5, Objective 2, the 8th bullet states, ‘Continue to seek to minimize disturbance of moderately steep to steep slopes within the Township.’ Chapter 9 (page 9-2, Topography, 1st paragraph) states that ‘...impacts to slopes of 15 percent to 25 percent can be mitigated through slope stabilization and other measures. Disturbance of slopes greater than 25 percent (very steep slopes) are more difficult to successfully mitigate and should be avoided wherever possible.’, which is consistent with *Livable Landscapes An Open Space Plan for Northampton County* (of Goal 1).

The LVPC recommends that the width of the riparian buffers for watercourses (100 feet) and wetlands (60 feet) be changed to 150 feet if designated as High Quality by DEP and 75 feet for wetlands not designated as Exceptional Value or High Quality by DEP (of *Livable Landscapes*, Goal 1). Additionally, the LVPC recommends the riparian buffers consist of a variety of native, climate-adaptive vegetation and carbon sequestering vegetation (of *FutureLV* Policy 3.4 and *Livable Landscapes* Goal 1)

Existing Land Use and Zoning

While the plan does not include zoning recommendations, the zoning analysis summarizes each section of the ordinance. The Zoning Build-Out Analysis includes build-out scenarios. Based on the 2040 population projections outlined in the plan, the Township requires a maximum of 367 new dwelling units, and zoning within the Township’s residential districts would allow for over 1,000 new dwelling units.

Community Development Objectives and Strategies

The plan outlines seven community development objectives to guide the Comprehensive Plan. Objective 1 is to ‘retain and protect the Township’s historic rural and agricultural character, prioritizing agriculture as a viable way of life.’ This corresponds with *FutureLV* to ‘preserve natural areas and farmland by managing growth and development to enhance and strengthen cities, boroughs, suburbs and rural communities’ (of Policy 1.1) Objective 2 seeks to ‘continue to provide and enforce regulatory protection for the Township’s environmentally sensitive areas, including steep slopes, woodlands, headwaters streams, floodplains, wetlands, groundwater, surface water, and aquifer recharge’ which aligns with the goals set forth in *FutureLV* to ‘protect

high-priority natural lands and water resources' (of Policy 3.1). LVPC commends the inclusion 'to preserve important historical buildings, structures, bridges, railroad traces, and other historical sites' which supports *FutureLV* to 'Maintain regional character by preserving priority environmental, historic, cultural, scenic and agricultural assets' (of Policy 1.3).

The LVPC applauds Objective 3, to 'continue to preserve and expand contiguous areas of farmland and other open space' which aligns with *FutureLV* goal to 'preserve agricultural and natural lands' (policy 1.1) and to 'support agriculture and open space as essential components of the regional economy and identity' (of Policy 4.4). The LVPC also suggests connecting the farmland areas mentioned within the Objective to the General Land Use Plan map in *FutureLV Plan* (pages 52-53) to reinforce the importance of farmland preservation. The LVPC commends the inclusion to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2) and further recommends that health and safety improvements be considered for documented malfunctioning on-lot sewage disposal systems or central systems regardless of if adjoining lands are proposed for development, to further support 'the health, safety and welfare of the public' (of Policy 3.2).

The LVPC commends the specific actions to 'prohibit new buildings, structures and fill in the 100-year floodplain identified through the Federal Flood Insurance Study and administered by FEMA'. This promotes safe community design and management and 'incorporates resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains' (of Policy 5.1). Objective 6 includes the promotion of 'transportation infrastructure, sidewalks, trails, and crosswalks, to resolve pedestrian safety issues which correlates with *FutureLV* to 'reduce bicycle and pedestrian facilities towards zero' and 'Promote safe routes to schools and playgrounds' (of Policy 5.1) and 'ensure transportation access for all persons' (of Policy 5.2). One of the Township's strategies to achieve Objective 7 is to 'utilize the Township's dedicated open space funds and other means to facilitate further preservation of Township agricultural and other open space lands'.

Future Land Use and Housing

The Future Land Use and Housing Plan intends to help protect the Township's rural character and way of life, mitigate development and economic changes, and support the Township's goal of remaining primarily a rural agricultural community. The Future Land Use Plan aligns with the intent of *FutureLV* to 'preserve natural areas and farmland by managing growth and development' (Policy 1.1). The Future Land Use map aligns with the land use categories of the *FutureLV Future Land Use Plan*, where the majority of the Township is identified for Agricultural Preservation Conservation with some areas as Low Density Residential.

The Future Land Use Plan acknowledges that a reasonable amount of growth is anticipated and beneficial to the Township. Economic development supportive of the Township's agricultural and eco-tourism industries is encouraged. To support a strategic balance between development and preservation, the Future Land Use Plan identifies

Village Mixed-Use and Medium Density Residential areas in the village of Martins Creek, and Mixed-Use areas along South Delaware Drive. These land use designations increase development flexibility and support local economic development strategies (of Policies 1.1 and 4.1). Two industrial areas are also identified where industrial development already exists (the Martins Creek Quarry to the southwest and Martins Creek Power Plant to the northeast), and a commercial area is located along Martins Creek-Belvidere Highway northeast of the Martins Creek village.

Housing considerations in are cognizant of balancing development densities with sustainable utility infrastructure capacities (of Policy 1.1), however the plan does not address affordability considerations for the Township's current and future residents. While Chapter 3 reports a median household income of \$70,050 in the Township and only 2.2% poverty, the LVPC recommends the Township consider strategies to ensure housing attainability for all persons, including those with mobility limitations, seniors as well as young adults who grew up with families in the Township but may not be able to afford housing on an entry-level salary (of Policy 4.5).

Transportation

It is recommended that transportation elements be compiled into goals, policies, and actions to help organize and an implementable plan. The Summary of Recommendations should prioritize and make short, mid and long-term recommendations for improving transportation infrastructure. Potential funding opportunities, such as eligible grants for studies or construction, should be included in this summary. The LVPC recommends active participating in the Lehigh Valley Transportation Study (LVTS) and Lehigh Valley Planning Commission (LVPC), Transportation Committee meetings (of Policy 2.6).

It is recommended that Lower Mount Bethel pursue designated truck routes with the Pennsylvania Department of Transportation (PennDOT) to direct commercial truck traffic to routes that can accommodate freight movements (of Policy 2.4). It is recommended that the Township study and refer to the LVPC Equity analysis in order to identify potential environmental justice communities or equity disenfranchised residents who may benefit from improved alternative modes of transportation improvements via funding opportunities (of Policies 2.1, 2.6, 5.2, and 5.3).

It should be noted that Northampton County Bridge #31 is listed in the LVTS Long Range Transportation Plan of *FutureLV* on page 158. Continued advocacy for inclusion of this bridge into the Transportation Improvement Program (TIP) should be ongoing by the Township and Northampton County, who owns the bridge (of policy 2.2).

Community Facilities

The Community Facilities Plan provides a thorough inventory of existing community facilities/services provided within in the Township and the Township's role in maintaining/enhancing them. The LVPC commends the Township on its efforts to protect drinking water supplies from groundwater contamination through its strategies

and implementation plan, aligning with the FutureLV action to ‘protect the quality and quantity of surface water and groundwater’.

The LVPC promotes development in areas with public sewer and water capacity and encourages the strengthening of public sewer and water in Centers and along Corridors, as needed. (*FutureLV the Regional Plan Policies 3.2*). The LVPC commends the objective to ‘consider establishment of appropriate policies and programs for sewage disposal within the Township through adoption of an updated Act 537 Plan.’

The Plan identifies existing on-lot sewage disposal concerns in several areas of the Township, especially higher-density areas. The Implementation Plan includes a Short-Term Item (#4) to ‘Investigate alternate sewage disposal methods for the high-density residential areas that are prone to septic system failure’. The LVPC suggests an analysis of alternatives be based on the most cost-effective, long-term options relative to the following solution hierarchy:

- Enhanced operation and maintenance of existing systems.
- Upgrading existing septic tanks and/or installment of new septic systems consistent with PA Department of Environmental Protection (DEP) regulations.
- Community on-lot disposal system.
- New or improved on-lot sewage disposal technology is to be consistent with DEP regulations.
- Central sewage system.
- Public sewage system.

Implementation

The Implementation Plan includes a Short-Term Item (#1) that requires additional testing for stormwater management facilities proposed in carbonate topography. The LVPC notes that provisions for infiltration testing in carbonate areas are included in the Lehigh and Northampton County Act 167 Stormwater Management Plan Water Quality Update, April 2006.

The LVPC suggests editing the Implementation Plan, Short-Term #6, to add to the list of updates for the Open Space Plan. The addition of the Delaware River Greenway should be included as Chapter 9 text states ‘that a Delaware River Greenway has been initiated with the Township parkland and Township trails along the Delaware River from Riverton to Depues Ferry Road.’

Summary

The LVPC is supportive of Lower Mount Bethel as they implement this Plan. The LVPC is available as a resource if the Township staff would like to discuss implementing planning topics or the LVPC’s guidance documents. The LVPC looks forward to continuing to work with Lower Mount Bethel on the Plan Slate Belt project.

Municipalities, when considering comprehensive plans and updates, 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)]. Please send a copy of the final Multi-Municipal Comprehensive Plan that is adopted by the Municipalities, per requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

Steve Neratko
Chief Community and Regional Planner

Dean Severson
Director of Regional Planning

Jill Seitz
Senior Community Planner

Teresa Mackey
Senior Environmental Planner

Bambi Griffin-Rivera
Community and Regional Planner

Susan Rockwell
Senior Environmental Planner

Julie Benco
Regional Planner

Brian Hite
Transportation Planner

cc: Jennifer Smethers, Lower Mount Bethel Township Manager; Brooke Kerzner, Bangor Borough Mayor; Nathaniel Dysard, Bangor Borough Manager; John Couch, East Bangor Borough Council; Robin Zmoda, Pen Argyl Borough Manager; Paul Levits, Plainfield Township Planning Commission Chair; Dan Wilkins, Portland Borough Planning Commission Chair; Cathy Martino, Roseto Borough Manager; Robert Teel, Upper Mount Bethel Township Planning Commission Chair; Ed Nelson, Upper Mount Bethel Township 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; Ryan Engler.



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Executive Director

November 8, 2022

Mr. Patrick McInerney, Chair
Lower Mount Bethel Township Planning Commission
Municipal Office, P. O. Box 257
Martins Creek, Pennsylvania 18063

**RE: 2022 Official Map Update
Lower Mount Bethel Township
Northampton County**

Dear Mr. McInerney:

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
 - November 15, 2022 at 12:00 PM
 - <https://lvpc.org/meetings.html>
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 - November 17, 2022 at 7:00 PM
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The proposed 2022 Lower Mount Bethel Township Official Map serves to support the proposed 2022 Lower Mount Bethel Comprehensive Plan, as well as *FutureLV: The Regional Plan* and is intended to promote the use of good planning methods and important planning tools. The Map defines current conditions and provides a vision for the Township's future. An official map shows the locations of planned future public lands and facilities such as streets, trails, parks, and open space. The official map expresses a municipality's interest in acquiring these lands for public purposes sometime in the future and this map serves as notification to the public of this interest.

The LVPC commends the use of available tools such as an official map, demonstrating an efficient and coordinated development pattern (of Goal 1) and the use of best practices in development patterns and community growth (of Policy 1.4). The draft Official Map is intended to further the Township goals of promoting open space and farmland preservation, by shifting away from the pressure of intense development. The proposed map is generally consistent with *FutureLV* as it serves to 'support agriculture and open space as essential components of the regional economy and identity' (Policy 4.4), as well as the identity of the Township.

Additionally, the LVPC offers the following comments that would further serve to meet the Township's goals and improve consistency with *FutureLV*:

- The LVPC recommends the Future Trail segment located on the south side of Martins Creek continues north to connect to the other Future Trails that intersect at Main and Front streets and South Delaware Drive.
- The LVPC also recommends the Township indicate as "Future Open Space" any lands designated as Natural Features Worthy of Conservation that the municipality deems critical to protect through acquisition or easement, such as the lands within the greenways referenced in the Comprehensive Plan.
- The Township should include floodplains and Natural Heritage Areas in the "Natural Features Worthy of Conservation" layer and consider adding a footnote on the map listing the natural features data included in this layer.
- The Township should display existing agricultural easements on the Official Map, which would indicate areas that are already preserved.

The LVPC is supportive of Lower Mount Bethel as they implement this Official Map. The LVPC is available as a resource if the Township staff would like to discuss implementing planning topics or the LVPC's guidance documents.

Municipalities, when considering comprehensive plans and updates, 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)]. Please send a copy of the final Multi-Municipal Comprehensive Plan that is adopted by the Municipalities, per requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,



Steve Neratko
Chief Community and Regional Planner



Teresa Mackey
Senior Environmental Planner

cc: Jennifer Smethers, Lower Mount Bethel Township Manager; Brooke Kerzner, Bangor Borough Mayor; Nathaniel Dysard, Bangor Borough Manager; John Couch, East Bangor Borough Council; Robin Zmoda, Pen Argyl Borough Manager; Paul Levits, Plainfield Township Planning Commission Chair; Dan Wilkins, Portland Borough Planning Commission Chair; Cathy Martino, Roseto Borough Manager; Robert Teel, Upper Mount Bethel Township Planning Commission Chair; Ed Nelson, Upper Mount Bethel Township 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; Ryan Engler.



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BECKY A. BRADLEY, AICP
Executive Director

November XX, 2022

Mark Hudson, Manager
Lower Saucon Township
Town Hall, 3700 Old Philadelphia Pike
Bethlehem, Pennsylvania 18015

**RE: Zoning Ordinance Amendments – Landfills and Waste Disposal Facilities
Zoning Map Amendment – Rural Agricultural to Light Industrial
Lower Saucon Township
Northampton County**

Dear Mr. Hudson:

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

- LVPC Comprehensive Planning Committee Meeting
 - November 15, 2022 at 12:00 PM
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 - November 17, 2022 at 7:00 PM

The subject application contains amendments to the Township Zoning Ordinance pertaining to Landfills and Waste Disposal Facilities, and proposes to amend the Township Zoning Map by rezoning a series of parcels from Rural Agricultural Zoning District (RA) to Light Industrial Zoning District (LI). While submitted jointly, the LVPC has reviewed these proposals separately and offers the following comments for each:

Zoning Ordinance Amendments

Conditional Use and Site Plan Exemption

The Township’s Zoning Ordinance currently designates Landfills and Waste Disposal Facilities as a special exception use in the LI District, which may be permitted when authorized by the Zoning Hearing Board, and site plan approval is required (Section 180-80).

The amendment proposes to change Landfills and Waste Disposal Facilities from a special exception to a conditional use in the LI District, and exempt landfill or waste disposal facilities from the site plan approval process if it will require land development approval under the Township Subdivision and Land Development Ordinance and a permit from the

Pennsylvania Department of Environmental Protection. Conditional uses may be permitted when authorized by the Township Council (Section 180-79.1)

The proposed text amendments do not align with the intent of *FutureLV: The Regional Plan* to protect the health, safety and welfare of the public (Policy 3.2). Landfills and Waste Disposal Facilities are high intensity land uses that pose adverse impacts on the public, and these impacts must be carefully considered and mitigated. Conditional and special exception uses are still permitted uses in a given zoning district, but with safeguards and review processes in place to ensure minimal adverse impacts on the public health safety and welfare. The text amendments propose reducing these safeguards and review processes. The safeguards in place ensure that all potential impacts on the public health, safety and welfare are considered (of Policy 3.2) and eliminating them is not a best practice for managing development (of Policy 1.4).

In the interest of ensuring that development processes are not duplicative or overly burdensome to the applicant, the LVPC recommends the Township review its ordinances to ensure that processes are reasonably stringent, and to ensure that Township processes are coordinated with outside agencies as needed (of Policy 1.4).

Natural Resource Mitigation Alternative

The amendment adds provisions for a Natural Resource Mitigation Alternative, where applicants proposing to develop an industrial use within the LI district are permitted – with written approval from Township Council – to exceed the net buildable site area and utilize a greater area of natural resource protection land than would otherwise be permitted in the ordinance, provided the Applicant dedicates an equal amount of land for preservation. Other provisions in the proposed section include that the land proposed for dedication does not need to contain the same environmental resources as those resource protection lands on the subject property, and the section provides a fee-in-lieu option if the applicant demonstrates inability to obtain any or enough property for dedication.

The addition of a Natural Resources Mitigation Alternative does not align with the intent of *FutureLV* to protect high-priority natural lands (of Policy 3.1). While the option to provide a fee in lieu of land preserved presents a financial opportunity for the Township, the LVPC advises against provisions that create opportunities for developing natural lands and risk fragmentation of natural landscapes and greenways.

Zoning Map Amendment

The subject applications propose to rezone seven parcels from Rural Agricultural Zoning District (RA) to Light Industrial Zoning District (LI). The parcels, totaling 275.7 acres, are located between Riverside Drive to the north, Bull Run Creek to the northeast and Applebutter Road to the south, adjacent to the existing Light Industrial Zoning District and Bethlehem Landfill. One property proposed to be rezoned is located on the western boundary of the Light Industrial Zoning District on Skyline Drive.



The areas proposed to be rezoned, particularly the northernmost parcels (areas 1-5 in Exhibit A) are in a Character Defining Area of the Future Land Use Plan, representing the natural and scenic character of the Lehigh Valley, including High Preservation Priority features of the Natural Resources Plan such as woodlands, steep slopes and Natural Heritage Inventory Core Habitats. The types of uses recommended are parks and open space, woodlands, agriculture, and low-intensity, limited scale development that preserves natural and scenic resources.

While expansion of the landfill can support the fiscal health of the Township (of Policy 4.6), it is strongly recommended that the Township prioritize retention of natural features as an essential characterizing attribute of the area near the Lehigh River. The Township's recently updated comprehensive plan, *Our Resources, Our Valley Multi-Municipal Comprehensive Planning in Pennsylvania's Saucon Valley*, identifies the Township's natural resources, along with its other cultural and historic assets, as significant components of the region's future economic development (page 1-6).

Municipalities, when considering zoning ordinance and map amendments, 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)]. Please send any final amendments that are adopted.

The LVPC has copied representatives of the Saucon Valley Multi-Municipal Plan to further 'coordinate land use decisions across municipal boundaries' (Policy 1.4). If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

Jillian Seitz
Senior Community Planner

CC: Cathy Hartranft, Hellertown Borough Manager



Lehigh Valley Planning Commission

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Vice Chair

KEVIN SCHMIDT
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

November XX, 2022

John Becker, Chair
Moore Township Planning Commission
2491 Community Drive
Bath, PA 18014

**RE: Subdivision and Land Development Ordinance Amendment - Miscellaneous
Moore Township
Northampton County**

Dear Mr. Becker:

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
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The subject application contains both amendments to the Township Subdivision and Land Development Ordinance pertaining to requiring applicants to submit documentation in a portable document format (PDF) and modifying the requirements for arterial, collector, and local roads. The LVPC has reviewed these proposals separately and offers the following comments for each:

SALDO Submissions

Sections 1 and 2 would include new language requiring applicants to submit plans and accompanying information digitally. This amendment demonstrates ‘evolution and adaptability of government’ (of Policy 1.1). The LVPC recognizes the rapid technological changes in technology and as a result recommends wording that will both meet the digital submission need for the Township and will be applicable overtime as technology continues to evolve.

The LVPC recommends wording that would include that 'PDF submissions should be made in a digital format by email, or another requested format, to the Administrator' in lieu of the specific formats listed out within the proposed ordinance amendment.

In addition, Appendix D would be amended to increase the number of prints to be forwarded to the Township Engineer for review from six to eight.

Modifying Requirements for Roads

All the aspects of the Moore Township proposed Amendments are consistent with PennDOT policies and procedures. The LVPC commends these updates as of "maintaining existing transportation infrastructure." (of Policy 2.6).

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Sincerely,

A handwritten signature in blue ink that reads "Bambi Griffin Rivera". The signature is written in a cursive, flowing style.

Bambi Griffin Rivera
Community and Regional Planner

cc: David M. Backenstoe, Township Solicitor



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Vice Chair

KEVIN SCHMIDT
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

November XX, 2022

Mr. Jonathan J. Reiss
Grim, Biehn & Thatcher
104 S. Sixth Street P.O. Box 215
Perkasie, PA 18944-00215

**RE: Zoning Ordinance Amendment – Create New Use for Self-Storage Facilities
in the HC – Highway Commercial Zoning District
Williams Township
Northampton County**

Dear Mr. Reiss:

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

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The subject application proposes to provide for a new self-storage use in the HC-Highway Commercial Zoning District. Indoor self-storage facilities, such as those included within this proposal, are becoming more prevalent, and the need for additional storage will only increase as housing density and prices increase. Indoor storage is able to offer amenities such as climate control and security. Multi-floor facilities are able to offer additional storage space without the sprawl that outdoor facilities produce. The Highway Commercial district is an opportune place to locate one of these facilities, as it offers the infrastructure needed for such a development.

These amendments align with the intent of *FutureLV: The Regional Plan* to demonstrate 'evolution and adaptability of government' (of Policy 1.1) and support an efficient development process (Policy 1.4). As these facilities are able to offset on-site storage for residents, they offer the ability to increase density and 'diversify price points and types of available housing' (of Policy 4.5)

Municipalities, when considering ordinance and map amendments, 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)].

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,



Steve Neratko
Chief Community and Regional Planner



Julie Benco
Regional Planner

cc: Mikal Sabatine, Township Manager
Katherine Faubert, Township Administrative Assistant
Alan Kirby, Chair, Williams Township Planning Commission



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BECKY A. BRADLEY, AICP
Executive Director

November 8, 2022

Marc S. Fisher, Solicitor
Lynn Township
2610 Walbert Avenue
Allentown, PA 18104

**RE: Zoning Ordinance Amendments – Non-agricultural development in the
Agricultural Preservation Zoning District
Lynn Township
Lehigh County**

Dear Mr. Fisher:

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:

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The subject application proposes to revise Sections 27-304.7.A., and 27-304.7. B. of the Lynn Township Zoning Ordinance, regulating non-agricultural residential development in the Agricultural Preservation zoning district. The proposed ordinance amendment includes the actual effective date of the ordinance in delineating the parent tract. It also adds, in addition to the 10% of the tract that can be used for non-agricultural development, an additional lot no larger than 10 acres in size. A deed must be attached to each application for non-farm development, and applicants are encouraged to check on rollback taxes or other consequences prior to submitting an application for non-agricultural development. The amendment further defines the applicability of zoning regulations for lots created prior to the effective date of the ordinance.

While the proposed updates are essentially a matter of local concern, the LVPC notes that the Township's Agricultural Preservation zoning district is an effective tool to "Preserve natural area and farmland by managing growth and development (Policy 1.1 of *FutureLV: The Regional Plan*).

The Township has stated that the permitted extra lot up to 10 acres in size will allow some landowners to create a lot that would qualify for preferential tax assessment under the State's Act 319 Clean and Green program. While the impact on the Township's agricultural resources of allowing an additional lot may be minimal, the Township should weigh the impacts in light of the Intent of the Agricultural Preservation District which is to "... promote the continued use of the area for agricultural purposes and to protect the integrity of the area for agricultural uses. Although limited non-agriculturally related residential development is permitted, this district is not intended to serve as an area for widespread suburban/exurban development."

Municipalities, when considering ordinance amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Dean Severson".

Dean Severson
Director of Regional Planning

CC: Janice Meyers, Heidelberg Township Administrator
Brian Carl, Weisenberg Township Administrator
Jill Seymour, Lowhill Township Secretary
Daniel Stevens, Borough of Slatington
Wade Marlatt, Washington Township