LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, July 27, 2023, at 7:00 PM
Via Microsoft Teams
AGENDA


Roll Call

Chairman’s Report
1. New Team Member Introductions

Courtesy of Floor

Minutes
1. ACTION ITEM: Minutes and Review of Roll Call Actions of the June 22, 2023, Commission Meeting (SN)

Comprehensive Planning Committee:
1. ACTION ITEM: Freemansburg Borough and Bethlehem Township – Land Use of Regional Significance – Freemansburg Industrial (BB/BH, SN)
2. ACTION ITEM: Allen Township – Land Use of Regional Significance – 770 Savage Road (SN, MG)
3. ACTION ITEM: Bethlehem Township – Land Use of Regional Significance – St. Luke’s Hospital Anderson Wing 3 (SN, JD, MG)
4. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (SN)
   a. Lower Saucon Township – Zoning Ordinance and Map Amendment – Rural Agricultural to Light Industrial (275.7 Acres)
   b. Forks Township – Zoning Ordinance and Map Amendment – Industrial Designation District
   c. Upper Macungie Township – Zoning Ordinance Amendment – Miscellaneous
   d. South Whitehall Township – Zoning Ordinance Amendment – Height Exceptions in Zoning Ordinance
5. INFORMATION ITEM: River Central Multi Municipal Plan Update (JS)
Environment Committee:
1. ACTION ITEM: Environment Committee Summary Sheet (SR/BB)
   a. Act 97 Review - Solid Waste Permit Reissuance Application – Hinkle Transfer Station - Lower Macungie Township
   b. Act 537 Review – Sewage Facilities Special Study – City of Bethlehem
   c. Delaware River Basin Commission Review – Application to Renew Approval of Existing Groundwater Withdrawal – Catasauqua Borough
   d. Delaware River Basin Commission Review – Application to Renew Approval of Existing Wastewater Treatment Plant and Discharge – Lehigh Valley Zoo
   e. Delaware River Basin Commission Review – Application to Renew Approval of Existing Surface Water Withdrawal and Approve Groundwater Withdrawal – Saucon Valley Country Club

Transportation Committee:
1. INFORMATION ITEM: Transportation Committee Summary (KH)

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

New Business:
1. INFORMATION ITEMS: Mid-Year Activity Reports
   a. Subdivision, Land Development, Stormwater and Municipal Ordinances (BB)
   b. LVPC Website Activity (TB)

Executive Director's Report:
1. INFORMATION ITEM: State Planning Board Final Permitting Reform Report (BB)

Communications, Grants and Education: (TB)
1. INFORMATION ITEM: Morning Call Business Cycle Column (TB)
   a. Published 7/9: “Lehigh Valley residents welcome transportation alternatives.”
   b. Next column on our e-commerce economy: August 13
2. INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (TB)
   a. Air Date: July 10, “Crafting a Balanced Approach To Transportation Options.”
   b. Next show: August 7, e-commerce and our ‘stuff’ economy
3. INFORMATION ITEM: Grants (TB)
   a. Pennsylvania Department of Community and Economic Development Multimodal Grant, Deadline: July 31
b. USDOT Rural and Tribal Assistance Pilot Program Grants Window: August 14 – September 27.

4. INFORMATION ITEM: Community Conversation for State Broadband Equity, Access, and Deployment (BEAD) and Digital Equity (DE) Plans: August 30, 6 p.m - 7:30 p.m, Northampton County Community College, Fowler Center, 511 E 3rd St, Bethlehem (BB)

5. INFORMATION ITEM: Lehigh Valley Government Academy Classes (TB)
   a. Subdivision and Land Development – Wednesdays, Sept. 6, 13, 20
   b. Community Planning – Mondays, October 9, 16, 23
      All classes 5:30-9 pm. Register at lvpc.org/lvga

6. INFORMATION ITEM: Local Technical Assistance Programs (TB)
   a. August 3: The Safe System Approach, 11 am to Noon, Virtual
   b. August 15: Public Works Safety, 8 am to Noon at the LVPC
   c. September 19: Traffic Signal Basics, 8 am to Noon at the LVPC
   d. October 11: Winter Maintenance Planning, 8 am to Noon at the LVPC
      1. Register for classes on the LTAP website gis.penndot.gov/ltap/
         call 800-FOR-LTAP or call Brian Hite at 610-264-4544.

**Next Lehigh Valley Planning Commission Meeting:**
Thursday, August 24, 2023, at 7:00 pm
The LVPC held a virtual public meeting on Thursday, June 22, 2023. The meeting was advertised in the Lehigh Valley Press on December 28, 2022.

Mr. Glickman chaired the meeting.

Mr. Neratko took Roll Call.

Members in Attendance:

**Lehigh County**
- Percy Dougherty, Michael Drabenstott, Philip Ginder, Steven Glickman, Kent Herman, Dennis Klusaritz, Joyce Moore, Christina Morgan, Santo Napoli, David Petrik, Stephen Repasch, and Kevin Schmidt

**Northampton County**
- Christopher Amato, Jessica Cope, Andrew Elliott, Charles Elliott, John Gallagher, Judy Haldeman, Darlene Heller, John McGorry, Stephen Melnick, and Armando Moritz-Chapelliquen

Members Absent:

**Lehigh County**
- Phillips Armstrong, Geoff Brace, Bob Elbic, Jamie Johnson, Rick Molchany, Owen O’Neil, Kathy Rader and Matthew Tuerk

**Northampton County**

Staff Present: Matt Assad, Becky Bradley, Steve Neratko, Dean Severson, Brian Hite, Joey Dotta.

Public Present: Craig Beavers, Gary Asteak, Jeff Ward, Judy Henckel.

**CHAIRMAN’S REPORT**

Mr. Glickman noted that last month in Detroit, during the National Association of Regional Council’s annual meeting, the Association awarded Becky the Tom Bradley Award, given each year to recognize the leadership and excellence of one elected or appointed official in advocating for regional concepts, approaches, and programs at any level of government. He noted that the nomination came as a surprise to Becky, who couldn’t be in Detroit during the presentation, so County Executive Armstrong was gracious enough to accept the award on her behalf.

In presenting the award, National Association President-Elect Carol Vinton said “Becky is an exemplary leader and planner with a remarkable track record of accomplishments that demonstrate her dedication to creating sustainable, equitable and livable communities. Her achievements have made a significant impact on the Lehigh Valley region and serve as a model for other planners across the nation.” We agree with President-Elect Vinton and congratulate Becky on this well-earned recognition.
COURTESY OF THE FLOOR

No members of the public spoke.

MINUTES

Mr. Glickman stated that the minutes of the Thursday, May 25, 2023, LVPC meeting are attached, and Mr. Neratko presented the previously voted on agenda items. Mr. Glickman then asked for a motion to approve the minutes. Mr. Dougherty made a motion to approve the minutes and Mr. McGory seconded the motion. Mr. Glickman asked for any comments or questions. There were none. The motion passed. Mr. Drabenstott, Mr. Klusaritz, and Ms. Cope abstained.

COMMITTEE REPORTS

Comprehensive Planning Committee:

ACTION ITEM: Catasauqua, North Catasauqua and Northampton Boroughs and East Allen and Hanover (LC) Townships – River Central Multi-Municipal Comprehensive Plan

Mr. Severson reported that the Draft River Central Area Multi-Municipal Comprehensive Plan (Plan) represents the first multi-municipal plan between Catasauqua, North Catasauqua and Northampton Boroughs, and Hanover and East Allen Townships. The plan was created with the assistance of the LVPC staff. The General Land Use Plan is fully consistent with FutureLV. The Plan serves to promote several goals and policies outlined in FutureLV: The Regional Plan.

The Draft Plan’s major goals include balancing preservation and development; promoting and coordinating a mixed-use transportation region; protecting and enhancing farmland and the farming community; preserving and expanding natural, recreation, cultural and historic resources; enhancing housing opportunities; and strengthening safe, healthy, creative inclusive and livable communities. Additionally, the plan meets all legally required criteria outlined in the Pennsylvania Municipalities Planning Code for Comprehensive Plans.

The Plan offers a variety of tools to coordinate new development with natural resources and open space, farmland, and the historic heritage prevalent throughout the region. Examples include conservation design consistent with the LVPC’s Conservation Guide and Model Regulation. The LVPC commends the inclusion of Goal 1: “Balance preservation and development aligned with appropriate infrastructure.” This objective aligns with the overall goal of FutureLV, which emphasizes sustainable growth and development while preserving the region’s natural and open spaces.

Mr. Severson noted that the plan encourages directing growth to designated centers and corridors, promoting mixed-use development that combines residential, commercial, and recreational uses. The goal is to reduce sprawl, enhance transportation options, and foster sustainable and livable communities. Similarly, the plan recognizes the importance of aligning industrial development with existing road capacity, transit service, and utility infrastructure to ensure efficient transportation and utility systems.

Mr. Dotta reported that the Plan’s policies recommending aligning development with sewer, water, and stormwater infrastructure reinforce FutureLV’s policy 3.2, which is to minimize environmental impacts of development to protect the health, safety and welfare of the public. Additionally, limiting public sewer and water system expansions to designated development areas and accommodating low-intensity development in exurban areas with on-lot sewage disposal and water supply help ensure efficient use of existing infrastructure. The Plan's emphasis on discouraging infrastructure-intensive land uses in areas served by on-lot sewage disposal or privately owned central sewage facilities is crucial for maintaining the capacity and functionality of these systems. The inclusion of capital improvement programs that prioritize
utility infrastructure needs and address drainage problems aligns well with responsible planning and Act 167 stormwater management plans.

The LVPC supports Goal 4 of the Draft Plan, “Preserve and expand natural, recreation, cultural and historic resources as essential to quality of life”. Preserving and enhancing historic/cultural resources is a commendable initiative within the Draft Plan's goals (of Policy 3.1 and 5.4 FutureLV). Goal 5, “Enhance housing opportunities for all”, is supportive of Policy 4.5 of FutureLV which encourages a wide variety of housing types at diverse and attainable price points to spur social and economic opportunities. The Draft Plan involved community engagement (of Policy 1.4 FutureLV) that revealed residents' concern to age in place. The Plan's strategies align with FutureLV Policy 5.2 by promoting universal design standards and adapting older housing units to align with Americans with Disabilities Act (ADA) standards.

Mr. Dotta noted that the Draft Plan's goals to grow the River Central economy aligns with several policies in FutureLV that promote sustainability of municipalities (Policy 4.6 FutureLV) and strengthen economic resilience and growth (Policy 4.1 and 4.2 FutureLV). The special focus of preserving and fortifying arts into the River Central community increases social and cultural opportunities (of Policy 4.2 FutureLV) by integrating community arts into public space (of Policy 5.4 FutureLV).

Mr. Severson stated that The Plan notes the difficulties individual emergency service providers face in personnel, funding, equipment and training. The Plan recommends increased coordination between emergency service providers, a regionwide response plan for community emergencies, and collaboration for cost-sharing opportunities for training recruits as well as facilities and equipment. This is an exemplary example of regional collaboration efforts recommended in FutureLV.

Mr. Glickman called for a motion to accept the staff comments. Mr. Dougherty made the motion; Dr. Amato seconded the motion. Dr. Amato stated that this was a very good plan and provided an opportunity for communities to bond together and to save their residents money. Mr. Moritz-Chapelliquen noted that the plan provided the impetus for these communities to come together. Ms. Bradley stated that for almost seven years these communities had discussed how they could come together. The LVPC looked at which communities were already working together and supported the creation of the multi-municipal plan.

The motion passed.

**ACTION ITEM:** Plainfield Township – Zoning Ordinance Amendment – Warehouse and Wholesale Establishments

Mr. Neratko presented the review of the subject application, which proposes to amend the Township Zoning Ordinance pertaining to warehouses and wholesale establishments, including revised definitions, changing permitted uses in commercial and industrial zoning districts and additional regulations and provisions.

The new definitions for ‘Warehouse’ and ‘Wholesale Establishment’ create subcategories for small and large developments based on square footage, using a threshold of 50,000 square feet. The LVPC applauds the Township for establishing multiple categories of freight uses, which is a recommended best practice for strategically managing growth and development (of Policy 1.4). This approach will enable the Township to ensure freight facility proposals, which can have a tremendous impact on traffic conditions and residents’ quality of life, are scaled and located appropriately to cause the least impact on the community (of Policy 2.4). Additionally, the amendment proposes to permit small warehouses and small wholesale establishments by right in commercial and industrial zoning districts. Large warehouses and large wholesale establishments are proposed to be permitted as special exception uses. The designation of large warehouses and large wholesale establishments as a special exception rather than permitted by right in certain districts allows consideration of proposals on a case-by-case basis to determine context-specific reasonable conditions to meet the goals of the Township, the Township’s Comprehensive Plan and the near-completion Slate Belt Multi-Municipal Comprehensive Plan.
Freight is a continually evolving and growing industry, and by 2040 the flow of freight is projected to increase by 96% (FutureLV Freight Special Section). The proposed amendments align with best practices and recommendations included in the Northampton County Freight-Based Land Use Management Guide and serve to minimize freight impacts on residents (of Policy 2.4). As the Township continues to evaluate its ordinances to ensure the best possible growth outcomes for the community, the LVPC recommends additional provisions that will enhance the quality of freight developments, such as requiring snow removal equipment, driver lounges and electric hookups and charging stations, and sustainable design considerations. Overall, the LVPC commends Plainfield Township for taking the initiative to address a regionwide issue and promote best practices in establishing efficient development processes responsive to regional needs (of Policy 1.4) through a well-written and thoughtful zoning ordinance amendment proposal.

Mr. Glickman called for a motion to accept the staff comments. Mr. Gallagher made the motion, Ms. Moore seconded the motion. Mr. Glickman asked for any comments or questions. The motion to accept the staff comments was amended to make this change.

The motion passed.

**ACTION ITEM: North Whitehall Township – Zoning Ordinance Amendment – Open Space and Recreation Areas**

Mr. Neratko presented the review of the subject application which proposes an amendment to North Whitehall Township’s SALDO Ordinance, to modify the amount of recreational land required to be dedicated, to update the amount of recreation fees to be paid in lieu of dedication, and the requirement to construct walking trails along the perimeter of all subdivisions and land developments where sidewalks are not required. The inclusion of trails in areas without sidewalks will ‘promote safe routes to school’, ensure transportation for all persons’, and ‘strengthen sidewalk, bike route and trail infrastructure’ (of Policies 5.1 and 5.3). The LVPC commends the inclusion that pathways and bikeways located away from street shall be adequately lighted which supports the ‘promotion of pedestrian scale lighting’ (of Policy 5.3). The suitability of Land Proposed for Dedication should be expanded to include all lands within the 500-year floodplain, rather than the 100-year floodplain. North Whitehall Township should prioritize medium or high-level natural resource conservation areas as based on the Natural Resource Plan, as well as the Natural Heritage Inventory of Lehigh and Northampton Counties. The LVPC recommends ensuring that all provisions of the MPC have been met that allow for adoption of a dedication or fee-in-lieu ordinance. The LVPC also encourages the inclusion of American with Disability Act compliant sidewalks with curb cuts for all new subdivisions and land developments as this supports the ‘strengthening of sidewalks’ of Policy 5.3.

Mr. Glickman called for a motion to accept the staff comments. Dr. Amato made the motion, Mr. Ginder seconded the motion. Mr. Glickman asked for any comments or questions. The motion to accept the staff comments was amended to make this change.

The motion passed. Mr. Klusaritz abstained.

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

Mr. Melnick presented the Comprehensive Planning Committee Summary Sheet, which included zoning ordinances for Wind Gap Borough, City of Bethlehem, Williams Township, Allen Township, and South Whitehall Township.

Mr. Dougherty made a motion to accept the Summary Sheet. Mr. Glickman asked for a second. Mr. Melnick seconded the motion. Mr. Glickman asked for any comments or questions. There were none. The motion carried.

**Environment Committee:**
Mr. Repasch reported that the Environment Committee had been cancelled.

**Transportation Committee:**

Mr. Herman reported the Transportation Committee meeting included a LVTS long range transportation plan update, Bridge Projects status report, a report on the 2020 Census Urbanized Area Smoothing, and updates on the passenger rail analysis and Eastern PA freight alliance infrastructure plan.

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

**City of Allentown, Lehigh County, Dodge Street from S. Muhlenberg Street to S. 24th Street**

Mr. Herman moved, and Mr. Melnick seconded the motion to approve the Transportation Summary Sheet containing the street vacation. The motion passed. Mr. Petrik abstained.

**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 16 subdivisions, 29 development proposals, 18 reviews for Stormwater Management, and two Municipal Ordinances and Maps for a total of 65 reviews.

The reviews included 871 housing units, the majority of which continue to be apartments, with a substantial number of single-family detached, townhouses and twins as well. Additionally, there were 551,542 square feet of non-residential development. The majority of industrial and overall non-residential square footage was due to warehousing (primarily River Pointe Logistics), at 2,171,140 square feet reviewed.

Mr. Glickman asked for any comments or questions. There were none.

*Highway Traffic Monitoring*

Mr. Hite noted that the Total Vehicle Traffic chart has changed a bit for this month's report. The Route 33 counter south of Route 248 has been deactivated to enable the paving of Route 33 in the area. It is anticipated to be re-installed by the end of this summer.

He presented the vehicle counts for State Route 22, Interstate78, and State Route 309, as well as the truck counts for Interstate-78 and State Route 22.

**New Business:**

*Local Government Appreciation Day*

Mr. Hite reported that the 2023 Local Government Appreciation Day will be held from 11 am to 1 pm, Wednesday June 28th at Wayne Grube Park. We'll be recognizing all the local government people who have participated in the Local Technical Assistance Program and the Lehigh Valley Government Academy classes over the past couple of years.

*Executive Director's Report:*

Ms. Bradley reported that on Friday, April 14th in Harrisburg the LVPC was recognized as a $1 million receipt EPA’s Carbon Pollution Reduction Program funds. Last Thursday, the LVPC Executive Committee
voted to file the required Notice of Intent. The notice has been filed and we received confirmation of receipt.

Our next step is to prepare a budget and work proposal and submit to the EPA by May 30th. Specifically, the EPA has organized the program as a “down payment” on climate action per Region 3 Administrator, Adam Ortiz. This means that we are charged with building capacity per program requirements. We intend to coordinate this with new Infrastructure Investment and Jobs Act requirements of the MPO for carbon reduction and protection and will be following-up PENNDOT and USDOT, the Delaware Valley Regional Planning Commission, Southwest Pennsylvania Commission, PA DEP and EPA further and will be bringing additional back as necessary. It is of note that DVRPC and SPC are the two other regions in the Commonwealth that also are recipients, as is the DEP.

Ms. Bradley noted that we are incredibly excited to be able to advance the goals, policies and action outlined in FutureLV: The Regional Plan which includes a strong and continued commitment to the environment and management of the realities of a robust industrial economy. We are also delighted to have the Commonwealth as a partner in industrial decarbonization. There is a significant deadline of March 1, 2024 for the Priority Climate Action Plan for Industrial Decarbonization. Again, we are coordinating with the PA DEP, as they have the same deadline and requirements at the state level. We are in regular communication with DEP, as a result and I’m anticipating that we have a lot more to discuss at the Environment Committee and potentially the Transportation Committee next month.

Because of the deadline for part one of the CPRP, the LVPC Team, has already been organizing to accommodate this funding deadline. Critical to that is that we are wrapping-up three key projects that we have spent significant time on this first half of the year. Those projects are the River Central Multi-Municipal Comprehensive Plan, that you reviewed this evening; the Slate Belt Multi-Municipal Comprehensive Plan that the final version will be sent to the Steering Committee next week for their meeting in July; the last major item is the LVTS’s review and edit of the transportation elements of FutureLV: The Regional Plan. LVTS is meeting through June to make those edits and staff will have a complete revision in July. You can expect to see the LVTS’s proposed revisions at the Transportation Committee next month, as well.

We are fast tracking the data components of our equity and housing data updates, both critical to the work that Lehigh County is invested in. Regarding housing, we are obligated to create a Housing Supply and Attainability Strategy for the region. Jill and I meet with the Urban Land Institute and Federal Reserve Bank of Philadelphia, and all agree that with the data updates occurring through the summer that, both of our program partners can reasonably mobilize to start the public portion of the housing work in January. There are two areas where we actively need to nudge the work plan and those are with the Lehigh County Industrial Land Use project. On this item, as soon as we can get done with the transportation updates to FutureLV, we believe we can start the data effort here but, we will need to adjust the final deliverable till next year. Lastly, we have been pursuing the consolidation and update of the 15 watershed plans we have written per Act 167. This is where we have regulatory authority, as delegated by the counties. Tracy and I have been actively organizing funding for the Global Act 167 Stormwater management plans update and we believe that we will have the funding organized by fall.

If our estimation is correct, we may need to adjust the work plan further. The main point here is that, so as long as we stay on task, we anticipate that we can remain on target with the work plan items, even with the addition of the EPA CPRG program. This is largely because we already had the DEP Local Climate Action planning work on the work plan. Now this is rolled into CPRG.

Ms. Bradley reported that the Eastern Transportation Coalition Freight Academy educates US Department of Transportation, State DOTs and Metropolitan Planning Organization professionals on freight movements, infrastructure needs, how the industrial economy works and what that means for transportation professionals and their work. The Freight Academy is a multi-month training program and is critical to helping the public sector best manage and invest federal, state, and regional transportation dollars into infrastructure.
The week of June 12th the Lehigh Valley hosted the academy for a day. It was an honor to be selected to discuss how the traditional freight economy (Crayola, Mack Trucks, B.Braun, etc.) operates in relationship to the rapid growth in new industrial uses. LVPC, along with LANTA, the Airport Authority, Workforce Board, PENNDOT, Pennsylvania Motor Truck Association, and J.G. Petrucci had the opportunity to present and discuss all aspects of land use, the environment, workforce, transit, land development, sewer and water, air and water quality, the needs of truck drivers, emergency services and the changing requirements of tenants of industrial buildings.

There are several key items to report:

First, Brian Hite was selected to participate in the Freight Academy. It is an application and acceptance process. He also received a full scholarship for the Academy, that covered all of his training and totals over $5,000. We are very proud of him as a transportation professional and also to be recognized nationally for his work in freight.

Secondly, the Commission is being heard and there is a growing alignment between other public agencies, like the USDOT and PENNDOT, and the industrial community made up of manufacturers and logistics companies. The transportation land use connection and the idea of limited financial resources to maintain the transportation system is widely recognized. Because of the massive challenges associated with rapid industrial development in the Lehigh Valley, we are being recognized as a leader nationwide in our work.

Additionally, manufacturers and even e-commerce companies are working to reduce their environmental footprint. We visited Alpla plastics, a new manufacturer in the Lehigh Valley located on the Southside of Bethlehem. They produce plastic containers for food and detergents that you see in your grocery stores. Their plastic pellets make the containers that come in on rail to the building and are moved by tubes into molding equipment. Bottles that are flawed are recycled and even the bottle labels are embedded onto the bottle surface to reduce the number of materials needed for the containers. The goal is to have a net zero waste stream, and to reduce energy costs, which the owner of the building has worked with them to do.

We also toured a brand new 425,000 square building in East Allen Township built by JG Petrucci. The building is LEED Silver certified. When we asked about this, and without hesitation, Petrucci began talking about the importance of reducing the carbon footprint. They cited not only it being the right way to build for our planet today and tomorrow but, they mentioned the reduction in longer term costs, sound, visual buffering and water management benefits, reduction in construction waste and energy usage and costs. Two other key points were made. The first is that more and more tenants are demanding it and the LVPC review letters supported greener building. It is of note that in addition to a green industrial facility, the site includes truck parking, a truck driver lounge and restroom. The message of the LVPC is being heard here but, also, your work is being heard by 40 transportation professionals of significant influence across the country. It’s something for all of us to be proud of.

Communications and Public Engagement:

**INFORMATION ITEM: Grants, Communication and Training**

Mr. Assad reported that in the most recent Business Cycle Column published June 9, and under the headline stating, “A Giant Leap Forward on Climate Action,” Becky spelled out the unprecedented opportunity the region has by pushing its way into the federal Environmental Protection Agency’s Carbon Pollution Reduction Program. As part of the program, the LVPC has been awarded a $1 million grant that serves as a downpayment for years of funding and programming for a potentially long list of programs designed to not only reduce carbon emissions but make our Lehigh Valley more resilient to the impacts of climate change. That column can be found at mcall.com and lvpc.org/news1v. The next column will focus on the result of our Transportation Needs Assessment. That one will be published July 9.
He also reported that the most recent Plan Lehigh Valley radio show aired on June 5 on WDIY FM 88.1, and it focused on the Social and Monetary Benefits of protecting our environment. Joining Becky and Matt was LVPC Master Planner and Engineer Geoff Reese. We talked a lot about how that $1 million climate reduction grant will kickstart a new push for climate action as well as some past LVPC studies and analysis that show just how much our environment means to our economy. That 30-minute show is now streaming at lvpc.org and wdiy.org. Our next show will focus on our Transportation Needs Survey and the Long-Range Transportation Plan. That will likely air at 6:30 pm, July 10.

Mr. Assad also reminded our municipal partners and non-profits that PennDOT recently opened its next application cycle for grants of $50,000 to $1.5 million for Transportation Alternative Set-Aside (TASA) projects. Municipalities and organizations with projects that promote walking, rolling, biking and transportation alternative education programs for children, can now apply for grants from a state fund of at least $28 million. Projects can range from sidewalk improvements to traffic calming to pedestrian safety to bicycle lanes to education programs for children K-12. The deadline for the draft application is July 17. More info is available on PennDOT’s TASA page.

Additionally, the Pennsylvania Department of Community and Economic Development also has a Multimodal Transportation Fund that provides grants of $100,000 to $3 million to municipal governments, businesses or transportation agencies. The money is for development, rehabilitation and enhancement of transportation assets to existing communities, streetscape, lighting, sidewalk enhancement, pedestrian safety, connectivity of transportation assets and transit-oriented development. Applicants must provide a 30% match and applications are due by July 31. More information and applications are available at DCED’s Multimodal Fund page.

Mr. Assad also reported that our in-person classes through the Pennsylvania Municipal Planning Education Institute will continue this fall, with a Subdivision and Land Development Class on three consecutive Wednesdays beginning September 6, and Community Planning on three consecutive Mondays beginning October 9th. All classes run from 5:30 pm-9:00 and go towards earning the designation as Certified Citizen Planning. More info and registration are on the LVPC website.

Mr. Hite reported that next week on June 27 there will be a virtual class on Municipal Stormwater Facilities Programs, and then on August 3, LTAP is hosting training on the Safe System Approach from 11 AM to noon. PennDOT Connects is offering workshops on Bicycle Selection later this month and Active Transportation in late September. Registration links and contact persons were provided.

**ADJOURNMENT:**

Mr. Glickman stated that the next LVPC meeting is set to be virtual on July 27th at 7pm. Mr. Glickman then asked if there was a motion to adjourn the meeting and Mr. Dougherty made a motion to adjourn. The meeting was adjourned.

Submitted by:
Becky Bradley, AICP, Executive Director and Dean Severson, AICP, Director of Regional Planning.
July 14, 2023

Mr. Jonathan Itterly, Manager
Freemansburg Borough
600 Monroe Street (Rear)
Freemansburg, PA 18017

Mr. Doug Bruce, Manager
Bethlehem Township
4225 Easton Avenue, Bethlehem, PA 18020

Re: Freemansburg Industrial – Land Use of Regional Significance
Freemansburg Borough
Bethlehem Township
Northampton County

Dear Messrs. Itterly and Bruce:

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

- LVPC Comprehensive Planning Committee Meeting: July 25, 2023, at 12:00PM
- LVPC Full Commission Meeting: July 27, 2023, at 7:00PM

The subject application is considered a Land Use of Regional Significance under FutureLV: The Regional Plan in the Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator category. The applicant proposes development of a quarry infill area with construction of an 866,350-square-foot warehouse and distribution facility with associated utilities and parking at 1600 Freemansburg Avenue (PIN N7 23 0205, N7 23 0212).

The project location is adjacent to several residential neighborhoods and poses substantial impacts to local transportation corridors and adjacent municipalities. Numerous issues related to site design and large-scale transportation concerns are outstanding and must be addressed to align with the objectives of FutureLV: The Regional Plan:
TRANSPORTATION

The LVPC reviewed the submitted Transportation Impact Study (TIS) prepared by Langan Engineering & Environmental Services dated May 22, 2023. The trip generation calculations within the TIS and reviewed by LVPC staff utilized the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th edition ITE Land Use Code 150 “Warehousing”. The LVPC recognizes the development team for utilizing Land Use Code 150 “Warehousing” as it provides a full range of warehousing calculation studies. ITE Land Use Code 150 is especially important for characterizing the proposed impacts for warehousing and logistics projects with no identified end user and are built primarily on speculation. Code 150 projects 961 passenger vehicle trips per day and 520 truck trips per day for a total of 1,481 overall trips per day.

The TIS states that the project has the potential to have 520 trucks per day accessing the site if developed using the ITE Land Use code 150 “warehousing”. The submitted TIS indicated that 50 truck trips per will be removed from the road network as a result of the current operations ceasing. The LVPC acknowledges the developer for the following statement in the TIS stating “To be conservative in our analysis for this study, we do not anticipate taking a credit for the existing truck traffic utilizing the site, however; we want to provide the data to enable PennDOT and the surrounding municipalities to understand that there are currently a large number of tri-axle dump trucks on the surrounding network that will be removed when the site is developed.” (TIS page 12).

SUPPLEMENTAL TRAFFIC GENERATION ANALYSIS

The submitted TIS included “appendix J”, “Tenant Specific Trip Generation Memo” for informational purposes only. The LVPC recognizes the developer team for completing traffic counts at a range of warehouses within the Lehigh Valley to document actual trip generation of facilities in operation in comparison to what the ITE Trip generation manual projects. However, the dates and locations of the specific tenant operations should be clarified so it can be determined whether warehouses studied were 100% operational at full levels. The counts performed in January 2021 were within the first year of the COVID-19. It is recommended that when future “Tenant Specific Trip Generations” are completed for this project or any others by the developer team that the data be augmented with tenant operations and operation specifics, as well as be completed in current situations and not rely on the pandemic-impacted years of 2020 and 2021. Those years are subjected to a PennDOT disclaimer on the Traffic Information Repository (TIRE) PennDOT website as noted “Note: Traffic volumes and classification breakdowns may be lower than normal due to the COVID-19 pandemic.

SITE ACCESS

Commercial truck access to and from the project location and the impacts to the surrounding communities are a concern because of the need for connectivity to Interstate 78 (I-78) via State Route 33 to the east or through the south side of the City of...
Bethlehem via State Route 412. Ultimately, the majority of commercial trucks will be on major arterial roads for access to the Interstate system of highways for the movement of freight. Tractor-trailer access impacts to the surrounding communities are a significant concern. Truck routes should be planned to prevent drivers from using GPS directions that guide them to I-78 along roads not built to handle large trucks.

The TIS contains the following statement on page 14: “We understand that the Borough of Freemansburg has expressed concerns regarding truck traffic along Main Street and Washington Street. Based on discussions with the developer and based on a review of current geometry within the area, we do not anticipate that any trucks will access the site via Main Street to Washington Street, as this route is not able to accommodate truck turns, especially at the intersection of Washington Street (SR 3005) with Freemansburg Avenue.”

The LVPC shares these same concerns with the Borough of Freemansburg. The residents along Main Street will be severely impacted by increased truck traffic without proper planning and mitigation efforts. The current usage of the site by tri-axle dump trucks results in truck trips that are localized in nature. Many of the drivers are the same on a daily basis and therefore know the road network obstacles and challenges of truck movements. The proposed redevelopment to warehousing will expand to include drivers from out of the area and who most likely will be unaware of the challenging road networks at the site location. Long haul deliveries by drivers who may only deliver or pick up at the site once are a more likely scenario. Relying on drivers to become familiar with the area’s challenges rather than addressing the infrastructure and truck routing issue is a major flaw in the long-term viability of the project. This will undoubtedly be a detriment to the community’s quality of life along with the financial burdens of the municipalities for incremental repairs and improvements that should be addressed at this stage of the development process by involving the developer.

The potential impacts to Freemansburg Borough’s State Route 3005 “Washington Street/Main Street” cannot be overlooked or dismissed without an in-depth analysis and infrastructure improvements or truck restrictions. The quickest route from the project location to Interstate 78 and the State Route 412 Interchange for Bethlehem/Hellertown is through the Main Street corridor. Main Street is a predominately residential street with challenging built conditions of smaller travel lanes, minimal rights-of-way and on-street parking. Additionally, the geometry of turn movements from Freemansburg Avenue to Washington Street is problematic for tractor-trailers. Careful planning, truck route designations and transportation improvements to mitigate the impacts of tractor-trailers to the community along Main Street are strongly recommended and encouraged.

The LVPC is extremely concerned that trucks will attempt to navigate what many perceive as an inaccessible route. Drivers will attempt to make turns following GPS or other unregulated traffic directional technology. The potential for serious infrastructure damage at the intersection, especially to traffic control devices such as traffic signals, is high if State Route 3005 is not truck-restricted or vastly improved to accommodate
trucks wanting to use this route to State Route 412 and Interstate 78. The expense to repair any damage will most likely to be shouldered by the municipality if the vehicle that causes the damage is not known and leaves the scene. To suggest that drivers will self-interpret whether they can navigate an unrestricted truck route is irresponsible and poor planning. It is strongly recommended that any and all potential truck routes and the design of this intersection be analyzed to improve the intersection and mitigate the potential for property damage along the entirety of State Route 3005. (of FutureLV Policies 1.4, 2.2 and 2.4)

Coordination between the developer, PennDOT, the City of Bethlehem, Bethlehem Township and Freemansburg Borough is strongly recommended to provide truck-routing to I-78 with appropriate regulations, signage and any other tools to communicate the proper truck routes for the project trucks to use. Designated Truck Routes should provide the safest and most efficient access to not only Interstate 78, but also to State Routes 33, 412 and Interstate 476 (PA Turnpike) as well as Lehigh Valley International Airport. (of FutureLV policy 2.4)

The LVPC notes that the impacts of tri-axle dump trucks of approximately 24 feet in length are vastly different than the typical tractor-trailer of 70 feet in length on the road networks that will be relied upon to facilitate operation of the site.

PennDOT bridge (Bridge Key 28759 Bridge ID 48300700702629) Freemansburg Avenue (State Route 3007) over Nancy Run is listed as a future transportation project on PennDOT OneMap, https://gis.penndot.gov/OneMap/, (Project ID 79145 and Project ID 110364 “SR 3007 over Nancy Run). While not currently part of the Lehigh Valley Transportation Study (LVTS) Transportation Improvement Program, this is an opportunity for the developer and PennDOT to coordinate project frontage improvements to the bridge, while also enabling any necessary improvements by the developer for Freemansburg Avenue (of FutureLV policy 2.6).

EMERGENCY ACCESS

The emergency access shown on the plans to Freemansburg Avenue is an essential emergency management accommodation. Gated access is shown on the plans near the proposed building trailer parking area, however, the control of the access point along Freemansburg Avenue is not shown. If this area is to be gated the access to this area should be planned for and coordinated with the local emergency services personnel to ensure proper access by emergency responders. However, access locations like this must be maintained in perpetuity as well as during winter weather events. The removal of snow from these areas is often forgotten until an emergency presents itself. It is strongly recommended that a maintenance and operation plan for the emergency access be memorialized to ensure adequate access by first responders and the ability to evacuate people via this access is continuous and unimpeded.

The location of the emergency access should be studied to confirm that it is not at risk of flooding from the nearby “Nancy Run” creek (of FutureLV policy 5.1).
TRANSPORTATION NETWORK SAFETY AND MOBILITY

Freemansburg Avenue in the vicinity of the project is listed as a current and future priority congested corridor in the LVTS Congestion Management Process (CMP) document, LVTS CMP Document. Projects that are increasing traffic congestion along the corridor should plan to mitigate the impacts of their projects. The municipality and developer should engage with PennDOT on recommendations to mitigate traffic congestion and improve traffic flow along Freemansburg Avenue.

The LVTS Safety Plan lists the intersection of Willow Park Road and Freemansburg Avenue as a High Crash Intersection. It is strongly recommended that improvements to this intersection, as well as the intersection of Freemansburg Avenue and Washington Street, be studied with recommendations to improve safety and efficiency of both intersections for improvements be coordinated with the municipalities and PennDOT. These improvements should take into account designated truck routes (of FutureLV Policy 2.2 + 2.6). It should be noted that there is currently truck turning movements at the intersection of Freemansburg Avenue and Washington Street. As indicated in the below image capture from Google Street View, the red circle indicates where you can see Dual Wheel tire tracks short cutting the turn radius. These types of events will increase without proper improvements to the intersection.

Freemansburg Avenue looking Southwest before Washington Street, which is on the left side, circle is truck dual wheel damage (image capture courtesy of Google Street View).

It should be noted that the TIS indicates that the developer will be improving the
intersection by creating a west bound left turn lane at the intersection of Freemansburg Avenue/Pembroke Road and Washington Street and Cambria Street. The design of these improvements and the sustained functionality of freight movements along this corridor is critical to the safety and efficiency of mobility in the area. Washington Street just east of the intersection with Freemansburg Avenue/Pembroke Road is a Lehigh and Northampton Transportation Authority (LANTA) transit bus stop location and should be carefully integrated into roadway improvements.

**ON SITE TRANSPORTATION MOVEMENTS**

Traffic circulation between the passenger vehicle parking areas and the truck areas on the plan should be clarified. The interactions of passenger vehicles and truck traffic should be minimized. However, the passenger vehicle movements to the northern portion of the project are not clear as to how to separate trucks and passenger vehicles. Plans should be detailed as to the expectations of vehicle movements.

Additionally, there appears to be numerous fences across aisles and parking areas shown on the plan sets. The gate access should be clarified and be placed in locations to enable appropriate queuing areas that don't impact vehicle movements throughout the project locations, especially if the intent is to separate passenger vehicles from commercial vehicles (of FutureLV Policy 1.2). Any and all gates on the property must consider access by emergency vehicles coming from different directions and ensure that entrance can accommodate emergency response effectively.

**FREIGHT CENTRIC AMENITIES**

Long-term truck parking spaces are not shown on the plans. It is strongly recommended that several truck parking spaces of at least 70 feet in length be provided on site to enable truck drivers who may be out of hours as regulated by the federal government to have an appropriate safe and efficient place to rest and reset their regulated operation of hours “clocks”. This will prevent drivers from illegally, and in some cases dangerously, parking on community streets or along roadway shoulders and exit ramps. Truck parking is a national problem that is evident across the Lehigh Valley. Freight centric facilities such as this can be part of the overall mitigation of the truck parking crisis by providing truck spaces on site for the vehicles that are essential to their sustainable operation and processes that are reliant on the trucks (of FutureLV Policy 2.4).

Tractor-trailer and trailer parking/dock spaces should consider the inclusion of electrical infrastructure to limit tractor-trailer idling and improve air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling law. The installation of this type of infrastructure would also mitigate sound impacts to the adjacent properties by providing cleaner and quieter sources of energy for in-cab truck amenities, as well as refrigeration units of trucks and trailers. (of FutureLV: Policy 3.2 and 1.3).
Additionally, truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary vehicle charging infrastructure that may be required. Trailers with refrigeration units are emerging with hybrid-run operations that enable an electric hookup to not rely on diesel fuel. Incorporating these features on-site can ‘reduce climate change impacts’ (of FutureLV: Policy 2.5 & 3.4) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.

It is strongly recommended that Commercial Vehicle driver amenities be provided, including a driver lounge with appropriate restrooms, dining area and a communications map wall to inform drivers of the proper truck routes to use during freight movements. This information area can also include the closest truck repair and fueling locations, dining and hotel locations and general points of interest to help inform drivers of the area they might not be familiar with (of FutureLV: Policy 2.4).

Snow removal equipment should be provided for on-site and located in a safe and convenient location. Snow removal from the tops of trucks and trailers is a Commonwealth of Pennsylvania Law. Freight centric facilities with trucks on site need to accommodate drivers in fulfilling the requirements of this law. Providing this amenity also ensures a safe transportation network by preventing snow and ice from sliding off the tops and onto roadways causing hazards for other vehicles and pedestrians (of FutureLV Policy 5.1 and 5.4).

MULTIMODAL TRANSPORTATION CONSIDERATIONS

In the FutureLV Transportation Plan, Centers are connected via Corridors. The project frontage utilizes Freemansburg Avenue as identified as one of these corridors. These Centers and Corridors are opportunities for creating denser, mixed-use and transit-supported development. These Centers and Corridors have been identified to encourage projects that expand, improve or connect the mixed-transportation network. Bethlehem, Northampton County is listed as an “Historic Center” and Madison Farms, an “Emerging Center” which connects via the Freemansburg Avenue Corridor.

Improvements along the frontage of the project present an excellent opportunity to increase multimodal mobility along Freemansburg Avenue, as envisioned within FutureLV, specifically along the corridor that is also referenced as being within a “Multimodal Accessibility Buffer”. Multimodal accessibility buffer and mobility improvements should be planned for and coordinated with the municipalities, PennDOT and the developer to construct the necessary infrastructure to support the goals of FutureLV. The municipal priorities for multimodal mobility and for the developer to enhance the overall community fit for the project also present an opportunity to incorporate the transportation needs of employees or all incomes and abilities.

It is recommended that sidewalks be constructed along the frontage of the industrial warehouse development in order to provide opportunities for employees who may wish to walk during break times during their workday. Sidewalks in a safe and accessible
location would essentially serve as a recreational trail for employees and truck drivers and would promote health and wellness onsite. Alternative modes of transportation amenities should be provided onsite, including bicycle racks in safe and well-lighted location in relative proximity to employee entrances.

The emergency access driveway along Freemansburg Avenue would be an excellent location for sidewalk construction, with a loop internal and external to the project location. This would also enable a pedestrian evacuation route to exist along with the vehicular emergency access to complement each other for emergency response purposes (of FutureLV policy 2.3, 5.2 & 5.3).

TRANSIT AND WORKFORCE

LANTA has reviewed the submitted Preliminary Master Site Plan (Record Plan) for the proposed Freemansburg Industrial project located on Freemansburg Avenue in Bethlehem Township and the Borough of Freemansburg, respectively, and offers the following comments.

LANTA currently provides public transportation along Freemansburg Avenue with a westbound-eastbound bus stop pairing located northeast of the project site at the Freemansburg Avenue and 2nd Street intersection, and to the southwest of the project site at the Pembroke Road and Livingston Street intersection. The distance between the two pairings of bus stops is approximately one mile, with no bus stops in between along the .40 mile frontage of the project site. There are no existing sidewalks along this portion of the corridor as well.

The proposed plan does not include sidewalks along its property frontage on the Freemansburg Avenue corridor, nor does it include internal sidewalks on the project site. LANTA strongly recommends including sidewalks along Freemansburg Avenue to accommodate a future bus stop that would serve transit riders and pedestrians of this proposed employment center, as well as an internal sidewalk network to connect along the main driveway entrance to the main corridor. Please contact Molly Wood at LANTA mwood@lantabus-pa.gov to continue early engagement and coordination on additional bus stop details for this project site.

EXISTING SITE CONDITIONS, PLANNING AND ZONING

Floodplain
A very small section of the existing parcel is located within the FEMA 100-year floodplain of Nancy Run and contains a riparian buffer. No development is proposed on this portion of the property.

Steep Slopes
A large portion of the property contains steep slopes created from a previous quarrying operation. There are also wooded lands on the western portion of the property identified on the plan as well as a small area identified as a Natural Heritage Inventory Supporting
Landscape. Policy 3.1 of FutureLV recommends the preservation of natural resources in the development process, as well as maximizing preservation of woodlands and critical habitats.

DEVELOPMENT AREA

This proposed development is in a development area based on the General Land Use Map. Development areas are areas that have most, or all the factors needed to support growth, such as sewer and transportation infrastructure capacity and contiguity to existing development and can accommodate a substantial amount of additional development. These areas are appropriate for a variety of uses, including major commercial, residential and industrial development.

The property is located within Bethlehem Township and Freemansburg Borough and is bordered by the City of Bethlehem to the west. Although the property is zoned General Industrial (GI) in both the Township and Borough, the site is adjacent to residential zoning and development to the west, north and east. Both the Township and Borough should coordinate with, and incorporate the comments of, the City of Bethlehem.

In addition to mitigating the substantial transportation concerns of an 866,350-square-foot warehouse in the midst of residential development discussed above, the plan must also address the visual and noise impacts of this development. The proposed development is to be located within the previous quarrying site such that it will be mostly surrounded by side walls that drop approximately 40-70 feet from surface elevation with 2:1 slopes. The developed area will also be surrounded by a six-foot high privacy fence. The warehouse and parking areas will be located within 350-500 feet from residential development along Washington Street to the north and 500-700 feet from Livingston Street to the west.

The plan proposes a single line of deciduous trees along the eastern and western parking lots, and a portion of the Freemansburg Avenue frontage. The large basin along Freemansburg Avenue is ringed by trees, and the remaining frontage of Freemansburg Avenue contains a mix of deciduous and evergreen trees and bushes. The Northampton County Freight-Based Land Use Management Guide recommends that warehouse developments be screened by a dense buffer yard of mixed evergreen, deciduous and flowering trees, bushes, and ground cover, as well as berm requirements. The Guide provides examples of buffer yard requirements from Lower Macungie, Forks, Moore, and Lehigh Townships, among others.

SUSTAINABLE BUILDING AND LANDSCAPING AND DESIGN

Green infrastructure and solar panels can be well-utilized on expansive roof surfaces when the roofs are constructed to accommodate their weight. Additionally, the developer should consider opportunities to incorporate sustainable energy systems into building functionality, which reduce overhead operational costs and ‘minimize environmental impacts of development’ (Policy 3.1).
Incorporating sustainable practices also helps to reduce climate change impacts (Policy 3.4 of *FutureLV*) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.

**STORMWATER REVIEW**

The project site is located within the Nancy Run 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,

Dean S. Severson, AICP
Director of Regional Planning

Brian Hite
Transportation Planner

cc: 1600 Freemansburg Associates, Applicant
Langan Engineering, Project Engineer/Surveyor
Justin Coyle, Borough Engineer
Ron Gawlik, Township Engineer
Denjam Khadka, LVPC Senior Civil/Environmental Engineer
Steve Neratko, LVPC Chief Community and Regional Planner
Geoffrey A. Reese, PE, LVPC Master Planner and Engineer
July XX, 2023

Mr. Gary Krill, Chair
Allen Township Planning Commission
4714 Indian Trail Road
Northampton, PA 18067

Re: Savage Road Development Plans
Allen Township
Northampton County

Dear Mr. Krill:

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 25, 2023, at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

- LVPC Full Commission Meeting
  - July 27, 2023, at 7:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

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.

This application is proposing the construction of a 358,000-square-foot warehouse, located on Savage Road in Allen Township, Northampton County. Improvements will include the associated parking and truck loading areas, a new stream crossing to provide access to Savage Road, and various underground infiltration basins to collect stormwater. The previously documented land use was a quarry and agriculture prior to residential use. The existing land use for the past 10 years has been a single-family residence with storage containers and agriculture.
According to *FutureLV*, the development is within a Development area. These areas have most, or all the factors needed to support growth, such as sewer and transportation infrastructure capacity and contiguity to existing development and can accommodate a substantial amount of additional development. These areas are appropriate for a variety of uses, including major commercial, residential, and industrial development. The plan was submitted as a preliminary/final plan submission, but the plan lacks key elements such as doors and other pedestrian movement features. Pedestrian movement is key to the success of a developed site. The applicant should provide the location of these elements on the plan.

The LVPC offers the following comments and recommendations:

A portion of the lot is situated on a steep slope of 15%-25%. The LVPC recommends special erosion and storm drainage controls enforced to ‘Minimize environmental impacts of development to protect the health safety and welfare of the public’ (*Policy 3.2*). Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the presence of karsts in the form of a surface mine on the site. The LVPC advises the applicant to ensure proper geotechnical testing prior to any land development, to ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (*Policy 3.2*).

The development is located within a High Conservation Priority Natural Resource area. These areas take precedence over other land use recommendations. This represents a conservation first perspective. The High and Medium Conservation Priority areas should also be used to prioritize conservation efforts. There is a planned stream crossing over a floodplain and the Federal Emergency Management Agency (FEMA) Flood Hazard Area. Building in the floodplain does not incorporate resiliency and hazard mitigation into planning due to the propensity for these areas to experience flooding losses. The LVPC recommends flooding mitigation actions be incorporated into the plan to help protect from flooding.

The LVPC encourages review and mitigation of potential adverse impacts to the adjacent community related to possible noise and light pollution from the proposed development to ‘increase the social, economic and environmental well-being of the region’ (*Policy 1.1*).

The LVPC commends the applicant for the inclusion of bountiful natural plantings and landscaping features throughout the site design. The use of native, climate-adaptive landscaping that removes carbon dioxide from the air and stores it where it doesn’t hurt the environment serves to ‘reduce climate change impacts through mitigation and adaptation’ (*Policy 3.4*).

**Pedestrians and Multimodal**

The project site is located directly adjacent to the Nor-Bath Trail, a commuter trail serving the region that is outlined in *FutureLV*. The project contains a monumental
opportunity to connect the proposed project, as well as the existing neighborhood directly adjacent to the site, the Allen Township Dog Park, and Howertown Park to the trail network. This contribution to the community would facilitate FutureLV Policy 2.1 to ‘develop a mixed-transportation network’ and ‘improve access to green spaces’ in support of promoting the physical and mental health in the community (Policy 5.3).

The lack of sidewalk infrastructure on site is a safety concern for pedestrians of all abilities. Employees, truck drivers and visitors to the building may wish to walk outside during break times and would be forced to walk in motorized vehicle driveways. It is strongly recommended that sidewalk infrastructure be constructed throughout the project (of FutureLV Policy 5.3). Constructing sidewalks during construction would provide long-term flexibility and sustainability to offer enhanced transportation modes in the future.

Multimodal amenities including bike racks should also be installed at the building. Bicycle racks provide safe places for cyclists to park their bikes and encourage more people to ride their bikes every day, whether for work, or errands. Including parking for bicycles supports a safe, healthy, inclusive, and livable community (FutureLV, Goal 5). Many residents who rely on public transportation use their bicycles for ‘last mile’ commutes. The LVPC recommends that a bicycle rack be included in the development plans (of FutureLV Policy 1.1, 2.3 and 5.2).

The Lehigh and Northampton Transportation Authority (LANTA) does not serve the area of the proposed warehouse. However, as times change, and growth occurs public transportation may be viable in the future. Discussion with LANTA should occur regarding the possibility of serving the area in the future and whether any infrastructure could be installed during development.

**Transportation**

Weaversville Road is considered a congested corridor and traffic impacts should be limited in this area. Vehicle traffic impacts can be worsened 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). No Transportation Impact Study (TIS) was received, however the LVPC transportation team reviewed the proposal and made comments and recommendations on the submitted plan set.

The LVPC transportation team utilized the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th edition to calculate vehicle trips for the proposal. The LVPC team used Land Use Code 150 “warehousing” as this is the most comprehensive land use for buildings of this nature that do not have a specific end user tenant identified and when the actual overall impacts are not known. That calculation resulted in an estimated 612 Total Vehicles of which 215 are tractor-trailers. The proposed plans do not include the location of truck loading docks or bays. It is also recommended that a traffic circulation plan be provided to indicate the interactions between passenger
vehicles and tractor trailers on the plan. It appears conflicts between these types of vehicles may occur. Proper signage, pavement markings and truck routes internal to the site should be considered.

Establishing truck routes is recommended from the proposed building to the transportation network of Routes 22, 33, 145, 191 and, 987, and Interstate 78. The LVPC Transportation review recommends a comprehensive truck route study for the entire area, using the LVIA Area Freight Study as a basis. Truck-routing and mitigation of freight impacts are critically important for the safe and efficient movement of freight and employees for the project to be sustainable in a transportation aspect.

Americans with Disabilities Act (ADA) parking spaces are not shown on the plans. It is federal law that accessible parking spaces be provided in accordance with the ADA. It is strongly recommended that the spaces be shown and sited appropriately to facilitate their utilization by individuals that meet the criteria for these dedicated parking spaces.

**Emergency Access**
The LVPC commends the inclusion of an emergency access from the building to Atlas Road. Roads for first responders and emergency services to utilize this driveway are a key element to response times. The functionality and construction of the access should be coordinated with local emergency services personnel. The access should be able to provide two-way traffic (minimum 20-foot cartway) for evacuations, as well as emergency response equipment to enter the site simultaneously. The access should be constructed to handle weights of up to 80,000 pounds and provide better turn radii than depicted on the truck turn templates provided on the plan set.

The emergency access area should be required to be continually maintained including snow and ice removal to always be available for emergency access during periods of inclement weather. It is recommended that pedestrian sidewalks be installed along the emergency access as well. The methods to control access should be shown on the plans and if gated, located appropriately as to not effect traffic flow and turning onto and from Atlas Road. *(of FutureLV, Policies 2.2 and 5.1)*

**Freight and Commercial Vehicle Parking**
Proposals such as this are commercial truck centric operations and should consider long-term truck parking spaces to provide drivers with a safe area to rest as essential to community, employee and driver safety. Truck and driver amenities should be incorporated along with overnight truck parking. Federal law regulates the hours of operation for commercial truck drivers. Truck parking options across the Lehigh Valley, the State of Pennsylvania, and the United States must be improved. Truck parking demand far outpaces available safe and convenient locations to park. As such, freight-centric buildings such as the one proposed must provide accommodations for long-term parking so drivers can rest as federal law requires. This is a critical safety element for freight movements. *(of FutureLV, Policy 2.4)*
Long-term truck parking spaces are not shown on the plans. The freight spaces located on the plans are 60' in length, however, the typical connected tractor-trailer is 70 feet in length. It is recommended that if these are intended to be tractor-trailer parking spaces, the pavement markings and layout be configured to park a 70-foot truck within the space provided. At a minimum, a tractor-trailer should be shown on the plan areas for trailers parking for planners and reviewers to be able to determine whether a connected tractor-trailer would interfere with the access drive areas to the parking areas. (of FutureLV policies 2.4 and 5.4)

**Commercial Vehicle Driver Amenities**

It is highly recommended that the driver amenities include break rooms or driver lounges with appropriate tables, vending machines, and the ability to relax or plan their day in a climate control environment. Driver lounges can be an information center for drivers unfamiliar with the area by incorporating truck routes and points of interest, including but not limited to local truck stops, repair facilities, restaurants, entertainment and hotels.

The LVPC staff review recommends that the developer includes snow removal equipment in a safe and efficient area with the capacity to manage snow once on the ground. The ability to remove snow prior to leaving the site can mitigate the impacts of accumulated snow falling or sliding off trucks and trailers and impeding vehicular traffic and visibility. The removal of these weather hazard impacts is outlined in the Pennsylvania Snow and Ice Removal Law. These amenities support truck drivers, community health and safety. (of FutureLV, Policy 3.4)

**Environmental Transportation Mitigation**

Tractor-trailer and trailer parking spaces should consider the inclusion of electrical hookup infrastructure to limit tractor-trailer idling and improve air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling law (of FutureLV, Policy 3.2 and 1.3). Additionally, truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary charging infrastructure that may be required. Trailers with refrigeration units are emerging with hybrid-run operations that enable an electric hookup to not rely on diesel fuel. Incorporating these features on-site can ‘reduce climate change impacts’ by offsetting the air quality impacts generated by freight uses and tractor-trailer idling. (of FutureLV, Policy 3.4) Green infrastructure and solar panels can be well-utilized on expansive roof surfaces when the roofs are constructed to accommodate their weight. Additionally, the developer should consider opportunities to incorporate sustainable energy systems into building functionality, which reduce overhead operational costs and ‘minimize environmental impacts of development’ (Policy 3.1).

Incorporating sustainable practices also helps to reduce climate change impacts (Policy 3.4 of FutureLV) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.
Stormwater Review

The project site is located within two watersheds, the Hokendaqua creek Watershed and the Catasauqua Creek Watershed. These watersheds have fully implemented Act 167 Stormwater Management Ordinances. Comments relative to our review of the project’s stormwater management plan are included as an attachment. Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with FutureLV: The Regional Plan, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review. If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

Steve Neratko
Chief Community and Regional Planner

Brian Hite
Transportation Planner

Mackenzie Geisner
Planning Intern

cc: Howard Krapf
Kay Krapf
Bill Levan, Krapf Park LLC
Jeffery L.Ott, Engineer
Ilene Eckhart, Township Manager
July XX, 2023

Amanda Raudenbush, Planning Director  
Bethlehem Township  
4225 Easton Ave  
Bethlehem, PA 18020

Re: St. Luke’s Anderson Campus Wing 3 – Land Development  
Bethlehem Township  
Northampton County

Dear Ms. Raudenbush:

The subject application is considered a Land Use of Regional Significance under FutureLV: The Regional Plan in the Medical Facility category. The applicant proposes a five-floor, 307,979-square-foot hospital expansion (146 bed) and a 32,417-square-foot Sterile Processing infill development at 1872 Riverside Circle at the St. Luke’s Anderson Campus (Parcel ID N8 3 1). This development supports the policies of FutureLV to “encourage local institutions to invest in their surrounding communities” (of Policy 4.1) and to “locate...hospitals and clinics in centers or along corridors” (of Policy 4.3). These types of development can have major impacts on the community as well as the residents of the region. “Access to preventative care drastically reduces high blood pressure, diabetes and obesity” (FutureLV Special Section).

Transportation
The LVPC agrees with the submitted “Traffic Narrative” that states the impacts of the sterile processing infill will be minimal to the overall traffic impacts from the hospital campus.

It is recommended that as the campus develops that new traffic counts be conducted to confirm the existing, actual impacts of the current year rather than the 2017 data provided under the current Transportation Impact Study. As the campus builds out, new traffic impact data will assess the ability for the hospital campus to be served with a safe and efficient transportation network surrounding the project, especially as the corridor redevelops along Freemansburg Avenue to areas to the west (of Policy 2.2).

It is recommended that the additional proposed parking lots be constructed with the necessary infrastructure to support and integrate electric vehicle charging on site. Convenient charging stations may encourage more employees and even patients who
may travel long distances to utilize electric vehicles and contribute to improvements of the air quality in the Lehigh Valley (of Policies 2.2 and 2.5).

It is also recommended that bicycle racks be located at convenient locations on the campus to facilitate utilization of alternative to engine powered vehicle modes of transportation (of Policy 5.2).

**Pedestrian Accessibility**

The LVPC commends the developer for placing necessary development accessories such as fire-hydrants, light poles, and signposts in locations that would prevent them from becoming potential obstacles to pedestrians, including those using a mobility device or tool such as a wheelchair, walker, scooter, or a white cane which allow people who are blind, deafblind, or visually impaired to navigate. This would ‘incorporate universal design and ensure accessibility for all persons (of Policy 5.2).

**Trails**

The project site is located directly adjacent to the Palmer-Bethlehem Township Bikeway, a commuter trail serving the region. The project contains a monumental opportunity to connect the proposed project, as well as the existing neighborhood directly adjacent to the site, to the trail network. This contribution to the community would facilitate *FutureLV* Policy 2.1 to ‘develop a mixed-transportation network’ and ‘improve access to green spaces’ in support of promoting the physical and mental health in the community (Policy 5.3).

**Infill**

The developer proposed a sterile processing infill, an area used to clean, inspect, disinfect and/or sterilize medical devices used during a surgical procedure, as a facility expansion to the existing hospital building. This element supports a core strategy of *FutureLV* to increase density in development areas (Density Special Section, page 71) and further enhances St. Luke’s capacity to serve its community.

The LVPC commends the proposed parking lot expansion * of new spaces and street network improvements in the northern area of the St. Luke’s Anderson campus. These additions will ‘improve efficiency of existing infrastructure’ and promotes ‘right-size transportation infrastructure projects’ (of Policy 2.2).

**Landscaping**

The implementation of vegetation such as landscaping in the form of concrete planters is encouraged by the LVPC to ‘create community spaces that promote physical and mental health’ (Policy 5.3). The introduction of native landscape material and pervious pavement will ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (Policy 3.2).
Stormwater Review
The project site is located within the Fry’s Run 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,

Steve Neratko
Chief Community Planner

Joseph Dotta
Community Fellow

Mackenzie Geisner
Planning Intern

cc:
St. Luke’s University Health Network, Applicant;
Scott Pasterski, P.E., PTOE, Project Engineer/Surveyor;
Ron Gawlik, Township Engineer;
Leslie Walker, Chair, Bethlehem Township Planning Commission
Denjam Khadka, LVPC Senior Civil/Environmental Engineer;
Geoffrey A. Reese, PE, LVPC Master Planner and Engineer;
## Project Review Summary Sheet

**Comprehensive Planning Committee**

<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
</tr>
</thead>
</table>
| Zoning Ordinance and Map Amendment | Lower Saucon Township | *Landfills and Waste Disposal Facilities* – Proposes to change Landfills and Waste Disposal Facilities from Special Exception to a use permitted by-right in the Light Industrial District and adds provisions for a Natural Resource Mitigation Alternative.  

*Rural Agricultural to Light Industrial* – Proposes to rezone seven parcels totaling 275.7 acres from Rural Agricultural to Light Industrial zoning district. | These 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), and a Natural Resources Mitigation Alternative does not protect high-priority natural lands (of Policy 3.1).  

The proposal to rezone the northernmost parcels as LI District does not align with the Future Land Use Plan of FutureLV. Overall, the proposed zoning ordinance amendments and zoning map amendments do not align with the goals outlined in the Township’s recently updated comprehensive plan or the intent, purpose and scope of the Township’s Zoning Ordinance. |
<p>| Zoning Ordinance and Map Amendment | Forks Township | <em>Industrial Designation District</em> – Proposes to amend the Township Zoning Ordinance by establishing an Industrial Designation District (ID) and amends the Township Zoning Map to rezone a series of parcels from Employment Center District (ED) to the newly created ID District. | The proposed ID District supports guiding the location and intensity of development and encourages reinvestment in commercial areas (of FutureLV Policies 1.1 and 4.6). The area to be rezoned as ID District is largely developed and consists of existing industrial uses, and aligns with the industrial area illustrated in the Forks Township Comprehensive Plan Update (2022) Future Land Use Plan. |</p>
<table>
<thead>
<tr>
<th>Comprehensive Planning Committee</th>
<th>Date: July 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning Ordinance Amendment</td>
<td></td>
</tr>
<tr>
<td><strong>Upper Macungie Township</strong></td>
<td><strong>Miscellaneous</strong> – Revisions include replacing the term “cluster development” with “Conservation Design Development”, providing minimum lot requirements for Distillery, Microbrewery and Winery uses, and specifying cartway widths for residential parking lots and Conservation Design Developments.</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td></td>
</tr>
<tr>
<td><strong>South Whitehall Township</strong></td>
<td><strong>Height Exceptions</strong> – Proposes ordinance revisions pertaining to permitted building heights, including exceptions, zoning officer approval, clarifications and requirements.</td>
</tr>
<tr>
<td>Project</td>
<td>Municipality</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Solid Waste Permit Reissuance Application</td>
<td>Lower Macungie</td>
</tr>
<tr>
<td>(Act 97 Review)</td>
<td>Township</td>
</tr>
<tr>
<td>Sewage Facilities Plan Special Study</td>
<td>City of Bethlehem</td>
</tr>
<tr>
<td>(Act 537 Review)</td>
<td></td>
</tr>
<tr>
<td>Application to Renew Approval of Existing</td>
<td>Catasauqua</td>
</tr>
<tr>
<td>Groundwater Withdrawal (DRBC Review)</td>
<td>Borough</td>
</tr>
</tbody>
</table>
## Project Review Summary Sheet

**Environment Committee**

**Date:** July 2023

<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application to Renew Approval of Existing Wastewater Treatment Plant</td>
<td>North Whitehall Township</td>
<td>Application by Lehigh County to renew approval of existing 21,000 gallons per day wastewater treatment plant and discharge to continue to serve the Lehigh Valley Zoo. No modifications to the plant are proposed.</td>
<td>Aligns with <em>FutureLV</em> action to 'protect the quality and quantity of surface water and groundwater' (under Policy 3.2). No substantial adverse impacts are anticipated with continued operation.</td>
</tr>
<tr>
<td>and Discharge (DRBC Review)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Application to Renew Approval of Existing Surface Water Withdrawal</td>
<td>Upper Saucon/Lower Saucon Townships</td>
<td>Application by Saucon Valley Country Club to renew approval of existing surface water withdrawal of up to 34.5 million gallons per month (mgm) for irrigation purposes at its four golf courses. Also, approve proposed irrigation system improvements to provide alternative groundwater supply of up to 36.143 mgm for use when surface water withdrawal is restricted during low flow conditions.</td>
<td>Aligns with <em>FutureLV</em> action to 'protect the quality and quantity of surface water and groundwater' (under Policy 3.2). No substantial adverse impacts are anticipated with continued operation.</td>
</tr>
</tbody>
</table>
**Plan Activity**

**Lehigh County**
- Reviews: 33
- Acres: 151.7

**Northampton County**
- Reviews: 28
- Acres: 69.2

<table>
<thead>
<tr>
<th>Activity</th>
<th>Lehigh County</th>
<th>Northampton County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Review</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>Non-Residential Review</td>
<td>8</td>
<td>6</td>
</tr>
<tr>
<td>Subdivisions and Lot Line Adjustments</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Stormwater Management</td>
<td>4</td>
<td>8</td>
</tr>
<tr>
<td>Municipal Ordinances and Maps</td>
<td>11</td>
<td>3</td>
</tr>
</tbody>
</table>

**Types of New Development**

**Residential: 579 Total Units**
- Single-Family Detached: 111
- Townhouses: 134
- Apartments: 326
- Planned Residential: 0
- Twins: 8
- Assisted-Living: 0
- Manufactured Homes: 0
- Condos: 0

**Non-Residential: 410,151 Total Square Feet**
- Commercial: 131,463
- Retail: 28,824
- Public/Quasi-Public: 4,000
- Industrial (Warehouse): I: 233,040 (W: 233,040)

**Location of Development**

- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

**Year to Date (Year to Year)**

- Residential Units
- Non-Residential Square Footage

**Regional Totals**

- 10 Subdivision/Lot Line Adjustments
- 23 Development
- 19 Stormwater Management
- 9 Municipal Ordinances and Maps
- 220.9 Acres

*Includes preliminary and final plans.*

*Warehouse number is a subset of industrial total square footage.*

Previous Reports at lvpc.org/subdivision---development.html
Plan Activity

Lehigh County

- Reviews: 174
- Acres: 1,145.9

Northampton County

- Reviews: 200
- Acres: 1,100.45

Residential: 2,791 Total Units

- Single-Family Detached: 433
- Townhouses: 603
- Apartments: 1,450
- Planned Residential: 0

- Twins: 222
- Assisted-Living: 0
- Manufactured Homes: 63
- Condos: 20

Non-Residential: 2,744,424 Total Square Feet

- Commercial: 750,503
- Retail: 88,156
- Public/Quasi-Public: 354,824
- Industrial (Warehouse)*: 5,546,505

- Transportation: 27,813
- Agriculture: 0
- Recreational: 0

Regional Totals*

- Subdivision/Lot Line Adjustments: 147
- Stormwater Management: 99
- Municipal Ordinances and Maps: 40

TOTAL: 2,246.35 Acres

* Includes preliminary and final plans

Types of New Development

Location of Development

- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

Year to Date (Year to Year)

- Residential Units
- Non-Residential Square Footage

Previous Reports at lvpc.org/subdivision---development.html
## 2023 Mid-Year Web Statistics

### 10 MOST VIEWED PAGES

<table>
<thead>
<tr>
<th>Landing Page</th>
<th>Page Views</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homepage</td>
<td>8,857</td>
</tr>
<tr>
<td>Transportation Plans under Transportation</td>
<td>1,956</td>
</tr>
<tr>
<td>LVPC Meetings under Commission</td>
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<td>DataLV Landing Page</td>
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<tr>
<td>Staff under Commission</td>
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<tr>
<td>Commission under Commission</td>
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<tr>
<td>Employment under Commission</td>
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<td>Transportation Landing Page</td>
<td>1,266</td>
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<tr>
<td>DataLV Housing under DataLV</td>
<td>1,096</td>
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</tbody>
</table>
This report was created by the Pennsylvania State Planning Board at the direction of the Governor's Office. An Ad Hoc committee for the review of the 2013 Permitting Reform Study was created for the completion of this project. The project was managed by Tree L. Zuzzio of the PA Department of Community & Economic Development.
In 2013, the State Planning Board produced a set of nine recommendations designed to reduce complexities and improve efficiencies within the local permitting process. The permitting process at the local level has long been considered complex, unpredictable, time-consuming, and occasionally contentious. The nine recommendations were carefully crafted after a survey and series of work sessions with key stakeholders, representing what are considered several “win-win” scenarios for local governments and private-sector developers.

Now, in 2023, the State Planning Board has been charged by Governor Josh Shapiro to examine the 2013 study, determine progress made on those initial recommendations and explain if they are still outstanding or pertinent. After consulting with a well-rounded focus group and the State Planning Board Ad Hoc committee studying the issue at length, it was determined that the 2013 recommendations have gone unimplemented.

As ten years have passed since the initial recommendations were made, the next task of the Ad Hoc Committee was to evaluate which 2013 recommendations were still necessary in 2023’s development climate. Each action item was considered based on the responses of the focus group and analyzed based on the deep well of knowledge available on the Ad Hoc committee. After this exercise, all of the 2013 recommendations have been retained; however, some clarifications and adjustments have been made. This list is not exhaustive; however, these recommendations, if properly implemented, can significantly improve the local permitting process for every community across the Commonwealth.
Development is regulated principally at the local government level. According to the 2019 PA Department of Community & Economic Development (DCED) Survey of County Planning Agencies of Pennsylvania’s 2,560 municipalities:

The development review-and-approval processes of these ordinances are determined by the PA Municipalities Planning Code (MPC) enacted in 1968; with several amendments having been adopted since. It should also be noted that some regulation is guided by court interpretations of the MPC. The development of case law has been instrumental in the development and clarification of the permitting process.

There are other local, in addition to state and federal, regulations and permits applicable to development. Of note are:

- Stormwater management and floodplain management (local governments).
- Uniform Construction Code (local governments and the Pennsylvania Department of Labor & Industry).
- Air and water pollution and waterways and wetlands encroachment (Pennsylvania Department of Environmental Protection and federal agencies).
- Highway access (PennDOT).

The above-mentioned local, state, and federal permit processes all have different timetables. Though there is no official mechanism to coordinate across political jurisdictions, Governor Shapiro’s Executive Order 2023-07 aims to better streamline the permitting process on the state level.
THE APPROACH

The 2013 review process involved an in-depth online survey, as well as in-depth research into best management practices, and a reoccurring stakeholder advisory meeting. The 2013 working group took over a year to produce its detailed report. When tasked with this project in 2023 the Ad Hoc Committee formed by the State Planning Board was given a total of three months to review the original recommendations.

After an analysis of the original recommendations, it was determined that little action has been taken in the interim ten years. A number of intervening factors including administrative change and a lack of dedicated resources hampered the reports ability to have meaningful impact. With that in mind, the Ad Hoc committee determined that a widely distributed survey was unnecessary and that a key stakeholder focus group would provide sufficient information to reevaluate the 2013 recommendations.

The focus group was made up of individuals from both the private and public sectors whose participation was recommended by members of the State Planning Board. The group session focused on the relevancy of the key issues identified in 2013 and if the policy recommendations provide adequate solutions.

KEY ISSUES

Though all key issues identified in the 2013 study were determined to still be relevant, several were highlighted as key stress points. The need for funding was also a major point of concern not established in 2013.

- The local land development review process is complex.
- Insufficient capacity and expertise can result in delays, expense, and less-than-optimal development.
- The need for education in both the public and private sectors.
- There is no consistent location for those involved with the process to find educational materials.
- Poor-quality submissions result in delays and wasted resources.
- The lack of integration among various federal, state, and local permitting processes causes development quality concerns.
- Caution is needed around creating any new unfunded mandates for both County and state agencies for the implementation of any newly authorized streamlining option as well as the necessary best practices training programs.
Through extensive discussion, the State Planning Board concluded that though some changes to the MPC may be necessary, under the current framework much can be accomplished to improve the permitting process. The legislative changes that the State Planning Board continues to support are designed to increase flexibility in the permitting process for local governments and to provide clarification. The Commonwealth is not a monolith, and each municipality should have the opportunity to fine-tune its process to best meet its needs. It was also found that there may be a significant way to update the MPC, however, it requires more research and may be politically contentious.

The streamlined options are already allowed under the current iteration of the MPC. However, both the public and private sectors need to be provided with technical assistance and education to properly implement these best practices. The educational materials should be developed and distributed through DCED, PennDOT, DCNR, other pertinent state agencies, and partner organizations.

Technical assistance and education are key to the success of any legislative changes and are essential for the more efficient implementation of streamlined options. Without it, it is unlikely that we will see meaningful improvement in the permitting process. Similarly, funding is key to these efforts as resources are necessary to provide training and for the process of implementing updates on the local level. All these suggestions are possible, especially if there is a concerted effort by leadership to support changes to the permitting process.

Not much has changed since 2013 but with the support of leadership, the targeting of funding, and the provision of technical assistance, the permitting process can be significantly improved within the Commonwealth.
LEGISLATIVE CHANGES

1. Provide Statutory Authorization of Unified Development Ordinances (UDOs) and a Unified Approval Process (UAP)

A UDO is a single ordinance that contains both zoning and subdivision-and-land development regulations. The required permits, processes, and regulations for development are outlined in one place, making it easier for developers, the public, and local officials to understand. Additionally, a UAP would be established to consolidate what are now separate zoning and subdivision approval processes.

The purpose of this consolidation would be to improve consistency within a municipality and reduce the complexity of the permitting process. UDOs and UAPs are not authorized by the Municipalities Planning Code (MPC), thereby requiring specific authority to be granted to municipalities to deviate from the existing process. If this were to be authorized, an initial funding allocation would be necessary to assist municipalities who wish to consolidate their ordinances and approval processes as the legal process to do so is complex and time-consuming.

2. Expand Authority of Specific Plans

A Specific Plan sets out aspects of development, effectively acting like a preliminary plan. It lays out the necessary infrastructure requirements such as roads, sewer, and drainage as well as land use features. If a project is consistent with the Specific Plan, it proceeds directly to the final Subdivision and/or Land Development approval phase.

Currently, Section 1106 of the MPC allows for the use of a Specific Plan when municipalities and/or counties adopt Multi-municipal Comprehensive Plans and an Intergovernmental Cooperative Planning and Implementation Agreement. It also limits the usage of Specific Plans to non-residential developments.

The MPC should be amended to expand the use of Specific Plans to any municipality and to include residential developments. This change would cut down on the complexity of the permitting process by clearly defining what is expected of a development. It would also improve the quality of project submissions by identifying the basic components from the onset.

3. Provide for One Substantive Review Step

This proposal would allow for the review process to be separated into two parts: the substantive (detailed) review followed by a “ministerial” (administrative) approval. The detailed review would involve ensuring that standards are met, public input is provided, and the developer is informed of any necessary changes. The ministerial review phase would ensure the final record plan conforms with approval, including required changes, made during the substantive review process.

This change would expedite the approval process by eliminating duplicative review and public input. Additionally, some capacity could be expanded due to the need for less intensive staff time.

The MPC should be amended to clarify a municipality’s ability to adopt a well-defined One Substantive Review process. As communities desire control over their development procedures, this should be made an optional process. The MPC should also be amended to outline what must be included in this process, if a community wished to participate, thereby strengthening the process and improving consistency. A single step process should be an integral part of a UDA or UDO as discussed in recommendation 1 above.
STREAMLINED OPTIONS (REQUIRING ADDITIONAL TRAINING)

1. Promote the Use of Sketch Plans
Sketch plans are a developer’s conceptual design of how the end project will appear. It does not include complete drawings or detailed engineering that would ordinarily be submitted in an application for preliminary or final approval.

The use of Sketch Plans also encourages developments that are more innovative and aligned with community goals. The early and open discussion of the Sketch Plan allows local officials and developers to creatively address mutual interests. By encouraging its use, the quality of an application can be improved early on, and the process would be more efficient for all involved.

Though the MPC does not prohibit municipalities from accepting Sketch Plans as an optional step, the normalization of its use can improve outcomes for both the public and private sector. In 2013, it was recommended that the MPC be amended to authorize a sketch plan as a mandatory step. However, it has been determined that the optional use of a Sketch Plan could significantly improve the process, without lengthening it or creating the expectation of vested interest on the side of the developer.

The Department of Community and Economic Development (DCED) in conjunction with other state agencies and its partner organizations should promote the use of sketch plans as a best practice. Training should be developed for both developers and municipalities. A list of recommended components of a Sketch Plan must also be developed.

2. Promote the Use of Tiered Review
The MPC currently allows for the streamlining of local land use and development approvals by using “tiered” or scaled review options. Tiered reviews provide for developments that meet certain thresholds to be subject to fewer steps in the review-and-approval process. One example would be to grant the local planning commission or planning department (staff) the authority to approve development that is below a certain size or with low impact.

The goal of this option is to reduce the complexity of the process and increase the capacity of local governments in the review process. By limiting the number of steps in the review process for projects of a certain type, resources can be redistributed to where there is a greater need.

To promote its use, DCED should develop training and highlight model ordinances for municipal governments. Additional funding may be necessary to create this training internally or by utilizing partner organizations. DCED should work in concert with other state agencies to distribute these trainings.

3. Promote Expedited Review Options
Expedited review is an optional process requested by an applicant for development. The expedited review can be done by a third-party consultant who has been pre-qualified or through a partnership with another local government with excess review capacity, thus bypassing the “normal” queue of development reviews. There is an additional cost for the expedited review which is paid by the developer/applicant.

It should be noted that those who choose the expedited review process are not “jumping the line” for those who choose to remain in the regular queue. It is separate and utilizes separate review experts who otherwise would not have been involved in the review.

This option cuts back on the amount of time for a project needed to move through the approval process. It also assists in increasing the capacity of a municipal government without adding additional strain to their finances.
A series of best practices for process and ethical considerations should be developed by DCED in consultation with the Pennsylvania Chapter of the American Planning Association and other pertinent partner organizations. Once these best practices are developed, they should be incorporated into a training module for municipal governments.

4. Promote the Use of Hearing Officers
Currently, the MPC allows for the use of a hearing officer for zoning hearing boards in special exceptions and other applications, and for the governing body in conditional-use applications. However, the MPC does not provide for the use of hearing officers for subdivision and land development reviews and approvals. Hearing officers, who are appointed by the jurisdiction, can be a single member of the board or an independent attorney.

The use of hearing officers can reduce the time required for approval by eliminating the need to assemble public bodies. Hearing officers can also provide capacity or expertise that may not exist among a board.

A series of best practices for process and ethical considerations should be developed by DCED in consultation with the Pennsylvania Chapter of the American Planning Association and other pertinent partner organizations. Once these best practices are developed, they should be incorporated into a training module for municipal governments.

5. Promote and Encourage Multi-municipal Cooperation
Multiple municipalities, by intergovernmental agreement, can create a single, shared process and structure for development submission, review, and approval.

Cooperation between multiple municipalities on development submission reviews can result in a more efficient, uniform, predictable, streamlined, and inviting regulatory and review environment for private-sector investment. Shared expertise can also be a time- and money-saving strategy for both local governments and developers.

DCED already supports the use of multi-municipal cooperation and should continue to do so. Additional funding for increased staff capacity on the state level would allow the department to communicate the benefits to more municipalities.

6. Establish Joint, Local/State Multi-agency Review
With the signing of Executive Order 2023-07 Governor Shapiro aimed to “increase the efficiency in the processing and the approval of Commonwealth-issued permits”. This will be done through the removal of excess requirements, the improvement of digital services, and the establishment of reasonable timeframes.

Though this order improves efficiency on the state level, continued exploration into how Federal, State, and Local review and approval processes can be coordinated. Process innovation and communication between the three levels of government should be encouraged. The lack of integration between these levels has continued to be a major point of concern for developers.
AREAS FOR FUTURE STUDY

1. Establishment Of County or Regional Development Permitting Districts

Two issues significantly affect review and permitting of development at the local government level:

- Lack of capacity and expertise to effectively administer development review among Pennsylvania’s predominantly small- to mid-size municipal governments; and
- Unpredictability and inconsistency in development review exacerbated by roughly 1,600 different zoning and subdivision ordinances and administrators in Pennsylvania.

Similar issues affected local earned income tax collection and led to enactment of Act 32 in 2008 which established county-based tax collection districts. Act 32 reduced the number of local income tax collectors from 560 to no more than 69 and promoted uniformity and streamlining in tax collection.

A similar concept could be examined for potential application in local development permitting. Under such a scenario, Pennsylvania could institute county-based development permitting districts. Districts could employ the professional expertise existing at county planning agencies or engage private consultants, which would perform the administrative role of completeness and compliance review of development applications. Districts would not supersede municipal authority. Reviews would be based on municipal ordinances, and municipalities would retain decision-making authority as prescribed in the Municipalities Planning Code. Districts would ensure adequate professional capacity and expertise for development review and reduce the number of local administrators from roughly 1,600 to as few as 67.

A variation of this concept could involve formation of regional permitting districts self-determined by collections of municipalities. Effectively, this is already authorized by the PA Intergovernmental Cooperation Act, but additional statutory authority could bolster and establish criteria to ensure districts are best formed to address the objectives of capacity, consistency, and predictability.

In following the lead of Act 32, a discussion would be needed to determine if the establishment of permitting districts would be mandatory. Alternately, new statutory provisions could establish authority for permitting districts as an option. Incentives could be considered to promote formation of permitting districts. PA DCED could give priority of staff effort to promote the concept and provide training and technical assistance for formation of districts.
Talking Business with Becky Bradley: Lehigh Valley residents welcome transportation alternatives

We really like our cars here in the Lehigh Valley. I get it. We have an extensive road network that makes it easy to get from point A to point B. Because we don’t have the density of big cities like Philly or New York, parking isn’t especially expensive or inconvenient. And save a few minutes a day during rush hours along Route 22, we’re not plagued by the congestion you see on the Schuylkill Expressway or Interstate 95 in Connecticut.

But every fiber of this planner’s being believes that the future of the Lehigh Valley rests with a more diverse transportation network. It’s healthy, better for the environment and will help prevent congestion on our roads. Plus, it gives everyone options to get around.
And, nothing is more American than choice. Selections provide opportunities. And opportunity is freedom. We want it all, and more than that we need every option we can reasonably create to support our economy, our environment and that ever critical balance, especially as the region grows.

The results of our recent regionwide transportation survey tell me we’re heading in the right direction. We’re still very much in love with our cars, but I believe we’re moving the needle on getting people to consider other options. The survey is part of our update of this region’s 25-year Long-Range Transportation strategy, and the answers impact how the Lehigh Valley Transportation Study, state and federal government decide to invest $4.3 billion on road, bridge, trail, technology and community projects through 2050. That amount is a more than 70% increase over our projected allocation from 2019, largely because of an infusion of money from the Infrastructure Investment and Jobs Act and the Lehigh Valley Planning Commission negotiating to get more money funneled into this region.

Of the more than 1,000 people who responded to the survey from 60 of this region’s 62 municipalities, 88% said they’ve driven alone in their cars more than 25 times over the past year. That should surprise no one, and I confess, I'd be in that group, too. But another 27% said they've carpooled to a destination at least 12 times in the past year. That's up from 10% in 2000. Perhaps even more encouraging is that 48% say they consider the region’s extensive network of more than 300 miles of multi-use trails part of the transportation system. No one even talked about that until 2018 when Northampton and Lehigh counties, the LVPC and LVTS began the process to merge the land use, environment, economic and transportation plans for the region into FutureLV. Roughly 29% said they’ve used a trail to get to a destination at least 12 times in the past year, and 44% said they’ve walked to a destination 12 or more times. Collectively we are making different choices now than even a few years ago and the infrastructure investment strategy should reflect this. But, that requires thinking very differently about alternative forms of transportation, whether it be using trails or public transportation or carpooling or simply walking.

It requires at least some people to believe that it’s perfectly reasonable for someone to hop on their bike in Bethlehem and ride the D&L Trail to their job in Allentown (more and more people do this now and our D&L partners have the trail data to prove it). Or to ride their bike a mile to the Lehigh and Northampton Transportation Authority bus stop, loading it on the bus’s bike rack – yes, all of LANTA’s 85 buses have bike racks – and take public transit to work or school.

Public transit is a perfect example. In the interest of full disclosure, I should mention I sit on the LANTA board. LANTA’s buses are clean, energy efficient and reliably on time. Users have access to a fantastic online app that tracks exactly where their bus is. But as LANTA Executive Director Owen O’Neil often says, most people consider it the option of last resort, rather than one to consider along with their car, bike, carpooling or feet as a
way to get around. That’s largely because our lack of density makes it difficult for LANTA to make the scheduling convenient for a lot of people. But LANTA is working toward changing that as it builds its Enhanced Bus Service/Bus Rapid Transit program that features express service between some of the region’s most-used shopping and business centers. Last month (June 19), LANTA flipped the switch on its initial BRT routes through the core of the region, providing limited stop service that comes as often as every 15 minutes. All-in-all, if we start to take the bus, it will help make public transit a bigger part of our transportation future.

Perhaps the best indicator of changing priorities in our survey came in what was, literally and figuratively, the money question. When asked how to invest $100 for transportation people, on average, put $35 on roads and bridges, $24 to pedestrian and bicycle accessibility, $23 to infrastructure resilience and $18 to transit. It’s not surprising that the largest part of the money would go to roads and bridges, but committing nearly half the money to walking, rolling and resilience tells me people are thinking very differently than they did just a few years ago. Even$18 towards transit is encouraging.

Interestingly, when people ranked their priorities among eight different transportation issues, they scored freight seventh. Good traffic flow, road pavement, bridges and walking took the top spots. I believe that’s because people have accepted our place in this new online shopping economy, and they accept we’re all contributing to that every time we order from Amazon.

In other words, their problem is not with freight, but rather its impact of bringing more trucks and warehouses which leads to more congestion and decreased air quality, among other things. We hear that as a key priority daily. But, then we all buy online, want it now and well that means more trucks and delivery vans. Hence, we create our fate, at least in part.

But that acceptance of our freight economy confirms what we already knew: Lehigh Valley residents are adaptable. It’s anecdotal, but from my travels in the community I see this shift happening. We are adapting. I don’t see us abandoning our cars anytime soon, but slowly people are beginning to consider those other options. If there was one benefit that came from the COVID-19 pandemic, it is that usage of the trail and public parks skyrocketed — at the local, state and federal levels — and the spillover effect is that some of those people continue their ventures into the great outdoors.

There are so many factors helping to move this needle, whether it be the recent influx of federal money providing cash incentives, or the growing need to mitigate the impacts of climate change or the push by many to live healthier. As we work to map out this region’s transportation future, people are starting to realize that our task is not about moving cars and trucks. It’s about moving people safely and efficiently by expanding and connecting travel options.

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