LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, May 25, 2023, at 7:00 PM
Via Microsoft Teams
AGENDA


Roll Call

Courtesy of Floor
1. Commissioner Brace will brief the board on General Assembly of Pennsylvania House Bill 782 of 2023.

Chair’s Report
1. INFORMATION ITEM: Coalition for Appropriate Transportation (CAT) Award
   a. LVPC Received the “Planning for Our Valley in the Big Picture” Award at CAT’s Annual Meeting May 3.

Minutes
1. ACTION ITEM: Minutes and Review of Roll Call Actions of the April 27, 2023, Commission Meeting (BGR)

Comprehensive Planning Committee:
1. ACTION ITEM: Upper Mount Bethel Township – Land Use of Regional Significance – River Pointe Logistics Lot 1 (JS, BH)
2. ACTION ITEM: Upper Mount Bethel Township – Land Use of Regional Significance – River Pointe Logistics Lot 2 (JS, BH)
3. ACTION ITEM: Upper Mount Bethel Township – Land Use of Regional Significance – River Pointe Logistics Lot 6 (JS, BH)
4. ACTION ITEM: Hanover Township – Land Use of Regional Significance – Arcadia Development Corp. 300 Gateway Drive (BGR)
5. ACTION ITEM: Forks Township – Land Use of Regional Significance – Legacy at Sullivan Trail (BGR)
6. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (SM)

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

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

New Business:
1. None.

Executive Director’s Report:
1. INFORMATION ITEMS:
   a. Work Program Updates
      i. Multi-Municipal Comprehensive Plans Update (BB)
      ii. Partnership Updates (BB)

Communications, Training and Grants:
2. INFORMATION ITEM: Morning Call Business Cycle Column (MA)
   a. Published May 7: “Lehigh Valley is More Powerful if We Work Together.”
   b. Next column to publish: June 4.
3. INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA). Streaming at WDIY.org
   a. Aired May 1: Why Regionalism Is Critical to Our Success
   b. Next show: June 5, Focusing on Climate Action
4. INFORMATION ITEM: Lehigh Valley Government Academy Classes (MA)
   a. Community Planning – Tuesdays, May 9, 16, 23
   b. Subdivision and Land Development – Wednesdays, Sept. 6, 13, 20
   c. Community Planning – Mondays, October 9, 16, 23
      All classes 5:30-9 pm. Register at lvpc.org/lvga
5. INFORMATION ITEM: Local Technical Assistance Programs (MA)
   a. June 6: Erosion and Sediment Control, 8 am to noon, in-person at the LVPC
   b. June 6: Bridge + Culvert Inspections for Municipalities, 8 am to noon
   c. June 13: Municipal Stormwater Facilities Program, 8 am to noon
   d. June 20: Stormwater Control Measures O+M, 8 am to noon
   e. Register for classes on the LTAP website gis.penndot.gov/ltap/ call 800-FOR-LTAP or call Brian Hite at 610-264-4544.
6. INFORMATION ITEM: Local Government Appreciation Day
   a. June 28: 11 am-1 pm, Wayne A. Grube Memorial Park

Next Lehigh Valley Planning Commission Meeting:
Thursday, June 22, 2023, at 7:00 pm
AN ACT

Amending the act of July 31, 1968 (P.L.805, No.247), entitled "An act to empower cities of the second class A, and third class, boroughs, incorporated towns, townships of the first and second classes including those within a county of the second class and counties of the second through eighth classes, individually or jointly, to plan their development and to govern the same by zoning, subdivision and land development ordinances, planned residential development and other ordinances, by official maps, by the reservation of certain land for future public purpose and by the acquisition of such land; to promote the conservation of energy through the use of planning practices and to promote the effective utilization of renewable energy sources; providing for the establishment of planning commissions, planning departments, planning committees and zoning hearing boards, authorizing them to charge fees, make inspections and hold public hearings; providing for mediation; providing for transferable development rights; providing for appropriations, appeals to courts and penalties for violations; and repealing acts and parts of acts," providing for developments of regional significance and impact; and, in zoning hearing board and other administrative proceedings, further providing for jurisdiction.

The General Assembly of the Commonwealth of Pennsylvania hereby enacts as follows:

Section 1. The act of July 31, 1968 (P.L.805, No.247), known as the Pennsylvania Municipalities Planning Code, is amended by adding an article to read:
ARTICLE VI-A
Developments of Regional Significance and Impact

Section 601-A. Purposes.

The purposes of this article are:

(1) To authorize a comprehensive and coordinated review by a municipality regarding a proposed development of regional significance and impact.

(2) To evaluate and mitigate potentially adverse impacts on community services, the economy, the environment, community character, transportation and infrastructure as a result of a development of regional significance and impact.

(3) To develop cost-effective and reasonable accountability measures regarding a development of regional significance and impact.

(4) To encourage timely, well-communicated and well-coordinated procedures to consider and authorize a development of regional significance and impact.

(5) To encourage planning consistent with section 27 of Article I of the Constitution of Pennsylvania.

Section 602-A. Definitions.

The following words and phrases when used in this article shall have the meanings given to them in this section unless the context clearly indicates otherwise:

"Department." The Department of Transportation of the Commonwealth.

"Earth disturbance activity." A construction or other human activity, done for the purpose of land development, that disturbs the surface of land.

"Host municipality." A municipality in which a proposed land development will be located.
"Intermodal terminal." An area or building where the transportation mode for freight or passengers changes.

"Petroleum storage facility." A facility used to store gasoline, motor fuel or other petroleum products with a capacity of more than:

1. fifty thousand barrels, if the facility is within 1,000 feet of a water supply; or
2. two hundred thousand barrels.

"Quarry." An open excavation used for extracting minerals, rock, stone, sand, gravel or building materials.

"Truck stop facility." An establishment that provides fuel, parking and related goods and services to primarily support truck transportation with at least:

1. six diesel pumps;
2. five acres of truck parking; or
3. twenty truck parking spaces.

"Waste-handling facility." A structure or system designed for the collection, processing or disposal of solid waste, including hazardous wastes. The term includes a transfer station, processing plant, recycling plant and disposal system.

Section 603-A. Applicability of article.

Unless this article specifically provides to the contrary, this article supplements this act and does not supersede any other provision of this act or other law.

Section 604-A. Scope of article.

This article shall not apply to a person or legal entity that is regulated by any of the following acts:

1. The act of May 31, 1945 (P.L.1198, No.418), known as the Surface Mining Conservation and Reclamation Act.
2. The act of April 27, 1966 (1st Sp.Sess., P.L.31,
No.1), known as The Bituminous Mine Subsidence and Land Conservation Act.


(6) 58 Pa.C.S. Ch. 32 (relating to development).

Section 605-A. Compliance.

A municipal, multimunicipal or county comprehensive plan shall include provisions consistent with the provisions contained in this article. If a host municipality is not governed by a municipal or multimunicipal comprehensive plan, the provisions of the county comprehensive plan in which the host municipality is located shall govern and shall be consistent with respect to the provisions contained in this article.

Section 606-A. Impact analysis.

(a) General rule.--If a person submits to a host municipality an application for land development that involves a development specified in this section, the applicant shall also submit an impact analysis under section 607-A to the host municipality.

(b) Types of development.--An impact analysis under section 607-A is required if a proposed land development consists of any of the following:

(1) an airport;

(2) an intermodal terminal;
(3) a petroleum storage facility;

(4) a waste-handling facility or the cumulative expansion of an existing waste-handling facility that occurs during any three-year period and creates a significant degradation in the level of service with respect to traffic impact, as determined by regulations established by the department;

(5) a quarry or the cumulative expansion of an existing quarry that occurs during any three-year period and creates a significant degradation in the level of service with respect to traffic impact, as determined by regulations established by the department;

(6) a truck stop facility that creates a significant degradation in the level of service with respect to traffic impact, as determined by regulations established by the department;

(7) a land development in a watershed that is unstudied under the act of October 4, 1978 (P.L.864, No.167), known as the Storm Water Management Act, and involves at least 100 acres of contributory watershed that is upstream from the land development and at least 25 acres in total land area of earth disturbance activity associated with the land development;

(8) a land development in which the permittees of the receiving sewerage facilities for the development have submitted information that documents that the existing collection, conveyance and treatment system have an existing hydraulic or organic overload or five-year projected overload; or

(9) a land development in which the permittees of the
collection, conveyance and treatment system receiving facilities have certified to the host municipality that there is not capacity to receive and treat sewage flows from the development or that the additional wasteload from the development will create a hydraulic or organic overload or five-year projected overload.

(c) Municipalities with population of 10,000 or more.--An impact analysis under section 607-A is required if a proposed land development is within a host municipality with a population of 10,000 or more, as determined by the most current decennial census, and will result in:

(1) the generation of 3,000 or more average daily trips or 1,500 vehicles per day; or

(2) a significant impact on highway safety or traffic flow, as determined by standards established by the department.

(d) Municipalities with population of less than 10,000.--An impact analysis under section 607-A is required if a proposed land development is within a host municipality with a population of less than 10,000, as determined by the most current decennial census, and will result in:

(1) a significant impact on highway safety or traffic flow, as determined by standards established by the department;

(2) the generation of 3,000 or more average daily trips or 1,500 vehicles per day;

(3) the generation of 100 or more vehicle trips entering or exiting the development during any one-hour time period of any day of the week; or

(4) for an existing site being redeveloped, the
generation of 100 or more additional vehicle trips entering
or exiting the development during any one-hour time period of
any day of the week.

(e) Comprehensive plan.--A host municipality may increase or
decrease a numerical threshold in subsection (c) or (d) to apply
to the municipality if:

(1) a revised numerical threshold is adopted in a county
plan or multimunicipal comprehensive plan under Article XI;

and

(2) the host municipality has:

(i) adopted the county plan or multimunicipal
comprehensive plan and conformed its local plans and
ordinances to the county plan or multimunicipal
comprehensive plan by implementing a cooperative
agreement and adopting appropriate resolutions and
ordinances; or

(ii) entered into an implementation agreement to
carry out the county plan or multimunicipal comprehensive
plan.

Section 607-A. Contents of impact analysis.

(a) Submission.--An applicant shall submit an impact
analysis to the host municipality as required by section 606-A.

(b) Costs.--An applicant shall be responsible for all costs
involving the preparation and review of the impact analysis.

(c) Contents.--An impact analysis under this section shall
analyze the effect of the proposed land development on the host
municipality and other affected municipalities and shall address
all of the following:

(1) The financial impact regarding any expanded
emergency and infrastructure services, including services
regarding police, fire, ambulance, medical care, sewer, water, transportation and utilities.

(2) The disturbance of agricultural areas, forested areas and greenfields.

(3) The effect on natural resources, historic resources and tourism, including parks, open spaces, historic structures, ethnic heritage sites, the character of neighborhoods and areas, historic landscapes, scenic views and wildlife habitats.

(4) The effect on residential housing opportunities, including property values and the potential number and character of new housing units.

(5) The redevelopment of brownfields or greyfields.

(6) The likelihood that the proposed land development will spur other land development in the area.

(7) Subject to traffic impact guidelines developed by the department, the effect on transportation and transportation infrastructure. Consideration shall be given to trip generation, trip distribution and area municipalities.

(8) Any other matter that is required by an applicable provision in the municipal or multimunicipal ordinance that governs the host municipality or that is covered by an applicable provision in the municipal, multimunicipal or county comprehensive plan for the host municipality.

Section 608-A. Classification as development of regional significance and impact.

(a) Notice of public hearing.--The following shall apply to a notice of public hearing:

(1) In addition to any other notice requirement under
this act, a host municipality shall provide timely written notice of the public hearing under this section to:

   (i) each contiguous municipality; and
   
   (ii) each municipality that is potentially impacted by the proposed land development and identified in the impact analysis under section 607-A.

   (2) The notice shall specify that the host municipality is considering whether to classify the proposed land development as a development of regional significance and impact.

(b) Public hearing.--The following shall apply to a public hearing:

   (1) A host municipality shall conduct a public hearing to review the impact analysis under section 607-A and determine whether the proposed land development is a development of regional significance and impact.

   (2) A representative from a municipality receiving notice under subsection (a) may provide public comment to the host municipality regarding the issue of whether to classify the proposed land development as a development of regional significance and impact.

(c) Determination.--The following shall apply to a process by which a host municipality determines whether to classify a proposed land development as a development of regional significance and impact:

   (1) The host municipality shall specifically consider the potential direct impacts on other municipalities.

   (2) The host municipality shall provide specific reasons supporting its determination.

(d) Effect.--Once a proposed land development is classified
as a development of regional significance and impact, the proposed land development shall be subject to the provisions of this article.

Section 609-A. Mitigation plan.

(a) Submission.--An applicant shall submit to the host municipality a written mitigation plan that explains the nature and extent of mitigation efforts to address any known or potential harm or negative effect cited by the host municipality in the classification of the proposed land development as a development of regional significance and impact under section 608-A.

(b) Professional review.--An applicant shall demonstrate that the mitigation plan submitted under this section has been reviewed and written comments have been prepared for the host municipality regarding the effect of the proposed mitigation measures on the public health, safety and welfare by:

(1) A traffic engineer.

(2) An individual who is:

   (i) licensed in this Commonwealth to perform services or activities related to the provisions of this article; and

   (ii) qualified by training and experience to perform such services or activities with technical competence.

(c) Costs.--An applicant shall be responsible for all costs involving the preparation and review of the mitigation plan.

Section 610-A. Coordinated and expedited review.

(a) Request.--An applicant may request a coordinated and expedited review of any aspect of a proposed development of regional significance and impact by the Department of Environmental Protection or other governmental
entity whose approval is required for the proposed development.

(b) Governmental cooperation.--The department, the Department of Environmental Protection or other governmental entity whose approval is required for the proposed land development shall ensure adequate communication and cooperation by and between the governmental entities.

(c) Submission of information.--In consultation with the department, the Department of Environmental Protection or other governmental entity whose approval is required for the proposed land development, an applicant shall submit to each governmental entity the necessary information for review of the proposed land development.

(d) Report.--Within 45 days after submission of all the necessary information under subsection (c) for a coordinated and expedited review, a governmental entity receiving the information shall prepare a written report of findings, comments and recommendations regarding the proposed land development and send the report to the applicant and host municipality.

(e) Discretion of governmental entity.--The following shall apply to the discretion of a governmental entity under this section:

(1) Nothing in this section shall be construed to require the department, the Department of Environmental Protection or other governmental entity whose approval is required for the proposed land development to conduct a coordinated and expedited review.

(2) Upon the written consent of the applicant, the department, the Department of Environmental Protection or other governmental entity whose approval is required for the proposed land development may extend the time period under
subsection (d).

(f) Fees.--The following shall apply to fees under this section:

(1) An applicant shall be responsible for all fees involving coordinated and expedited review of a proposed development of regional significance and impact under this section.

(2) Unless the applicant agrees otherwise, if the department, the Department of Environmental Protection or other governmental entity whose approval is required for the proposed land development cannot complete the coordinated and expedited review and submit the report within the time period under subsection (d), the governmental entity shall return to the applicant the full amount of the fee collected under this section.

Section 611-A. Municipal review and determination.

(a) Hearing required.--The host municipality shall conduct a hearing to review a proposed development of regional significance and impact.

(b) Considerations.--At the hearing the host municipality shall consider all of the following:

(1) Subject to subsection (c), testimony and other information from:

(i) The department.

(ii) The Department of Environmental Protection.

(iii) Other governmental entities whose approval is required for the proposed land development.

(iv) The county in which the host municipality is located.

(v) Contiguous municipalities.
(vi) Municipalities that are potentially impacted by the proposed land development.

(vii) Area school districts potentially impacted by the proposed land development.

(viii) Concerned individuals, municipal and regional planners, engineers, persons potentially impacted by the proposed land development and other persons as determined by the host municipality.

(2) The impact analysis under section 607-A and other reports concerning the proposed land development.

(3) The mitigation plan under section 609-A.

(4) Whether the proposed land development is consistent with an applicable provision in:

   (i) a municipal, multimunicipal or county comprehensive plan; and

   (ii) a municipal or multimunicipal ordinance or regulation.

(5) The totality of impacts regarding the proposed land development and the cumulative effect of development on the host municipality and affected municipalities.

(c) Testimony.--The host municipality may limit the testimony to be presented at the hearing if the testimony is repetitive.

(d) Determination.--Based on the testimony and other information received with respect to a proposed development of regional significance and impact, the host municipality may:

   (1) Approve the proposed development.

   (2) Approve the proposed development with conditions attached. A condition shall be reasonable and necessary to mitigate any impact or additional impact attributable to the
proposed development and shall bear a direct relationship to
the burden being imposed by the proposed development. A
condition may not involve any of the following:

(i) The correction of an existing deficiency in the
environment or public infrastructure.

(ii) A contribution or payment for the acquisition
of land or expansion of public facilities, unless the
host municipality's municipal ordinance contains the same
or a similar condition for development that is not
subject to this article.

(iii) The contribution or payment associated with
the cost of a municipal improvement that exceeds the
proposed development's proportionate share of the cost
established under this article or any applicable
provision of this act or other law or ordinance. By
accepting the proposed development's proportionate share,
the host municipality assures that the municipal
improvement will be made without any additional
contribution or payment from the applicant for that
purpose.

(3) Disapprove the proposed development.

(e) Reasons.--The host municipality shall provide specific
reasons supporting its determination under subsection (d).

Section 612-A. Additional standards and criteria.
Nothing in this article shall be construed to restrict a
municipality from establishing additional standards and criteria
under this article, in conformity with this act, including, but
not limited to:

(1) thresholds under subsection 606-A;

(2) the contents of an impact analysis under section
Section 607-A(c):

(3) the classification of a development of regional significance and impact under section 608-A; and

(4) considerations under section 611-A(b).

Section 613-A. Financial considerations.

(a) Applicant costs.--The host municipality or the county in which the host municipality is located may provide financial incentives to an applicant to mitigate the costs regarding an impact analysis, a mitigation plan or a coordinated and expedited review of a proposed development of regional significance and impact.

(b) Tax sharing.--The host municipality shall develop a tax sharing plan for contiguous municipalities adversely affected by an approved development of regional significance and impact as a result of additional expenses incurred for police and fire protection, medical services, road maintenance and infrastructure.

(c) Professional review.--If a host municipality lacks capacity regarding the professional review of the proposed land development plans, the impact analysis or the mitigation plan, the county in which the host municipality is located shall determine whether and the extent to which the county can assist the host municipality with the professional review.

Section 614-A. Notice generally.

Except as otherwise provided in this article, this act shall govern notice of a public hearing, hearing or determination. Written notice shall be given to the applicant, an owner of property that is contiguous to the proposed land development and other person requesting a copy of the notice. A municipality shall provide, as appropriate, timely written notification to a
contiguous municipality, municipality or area school district potentially impacted by the proposed land development.

Section 615-A. Appeals.

(a) Jurisdiction.--An appeal of a determination under section 611-A must be filed with the court of common pleas of the county in which the host municipality which made the determination is located.

(b) Parties.--An appeal under this section shall be limited to those parties that appeared before the host municipality at the hearing.

(c) Review.--The review of the determination under section 611-A shall be governed by Article X-A.

(d) Mediation.--Parties to a contested case may use mediation as an aid to a formal appeal, in which case the provisions of section 908.1 shall govern.

Section 2. Section 909.1(b) of the act is amended by adding a paragraph to read:

Section 909.1. Jurisdiction.---* * *

(b) The governing body or, except as to clauses (3), (4) and (5), the planning agency, if designated, shall have exclusive jurisdiction to hear and render final adjudications in the following matters:

* * *

(8) Applications for a proposed land development under

Article VI-A.

Section 3. This act shall take effect in six months.
LEHIGH VALLEY PLANNING COMMISSION
Minutes from the Thursday, April 27, 2023 Meeting

The LVPC held a virtual public meeting on Thursday, April 27, 2023. The meeting was advertised in the Lehigh Valley Press on December 28, 2022.

Mr. Glickman chaired the meeting.

Ms. Griffin-Rivera took Roll Call.

Members in Attendance:

**Lehigh County**
Geoff Brace, Bob Elbich, Philip Ginder, Steven Glickman, Kent Herman, Rick Molchany, Joyce Moore, Christina Morgan, David Petrik, Kathy Rader, Stephen Repasch and Kevin Schmidt.

**Northampton County**

Members Absent:

**Lehigh County**

**Northampton County**

**Staff Present:** Matt Assad, Becky Bradley, Bambi Griffin-Rivera, Steve Neratko, Dean Severson, Christian Martinez, and Joey Dotta.

**Public Present:** Cassie Hilgert, President and CEO, ArtsQuest

**CHAIRMAN’S REPORT**

Mr. Glickman noted that the LVPC appeared before Lehigh County to present the activities of the LVPC and that there will be a presentation next Thursday before Northampton County. He also noted that Representative Schlossberg has introduced House Bill 27 which would amend the Municipalities Planning Code to provide for a coordinated, timely review of developments of regional significance. Representative Schlossberg and Commissioner Brace have been invited to the May 25th LVPC meeting to discuss HB 287.

Mr. Molchany commended the presentation made to the Lehigh County Commissioners especially in the areas of equity housing, climate action, especially in the areas of air and water, and future zoning opportunities. Mr. Elbich also commended the staff presentations. Mr. Glickman that the presentation was recorded and available on the Lehigh County website.

**MINUTES**
Mr. Glickman stated that the minutes of the Thursday, March 23, 2023, LVPC meeting are attached, and Ms. Bradley read the previously voted on agenda items. Mr. Glickman then asked for a motion to approve the minutes. Mr. Repasch made a motion to approve the minutes and Mr. Melnick seconded the motion. Mr. Glickman asked for any comments or questions. There were none. The motion passed, with Ms. Rader, Ms. Moore, Mr. Gallagher, and Ms. Heller abstaining.

COMMITTEE REPORTS

Comprehensive Planning Committee:

**ACTION ITEM: City of Bethlehem – Land Use of Regional Significance REVISED – ArtsQuest Southside Bethlehem Cultural Arts Center**

Ms. Griffin-Rivers presented the review of the subject application, which is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Educational Facilities category. This project proposes to redevelop the site by constructing a 78,855-squarefoot cultural arts center.

Mr. Glickman called for a motion to accept the staff comments. Mr. Molchany made the motion; Mr. Menges seconded the motion. Mr. Glickman asked for any comments or questions.

Ms. Heller noted that the City of Bethlehem was very happy with the project and that they have working closely with ArtsQuest. The City feels the project completes the block and is an anchor institution. She added that it is a walkable site. Mr. Molchany stated that he liked the sustainable development comment added to the review and that the Commission should consider adding it to all of our reviews. He also commented that the Commission isn’t looking for a LEED type development, only that sustainable elements be added to the design. Mr. Glickman noted that reuse and adapting of existing buildings is much more sustainable.

Ms. Leon noted concerns on attracting development to areas like this and making sure the community isn’t displaced in the process and inadvertently affecting the rental community. Mr. Moritz-Chapelliquen wondered if some of the specific items that were mentioned in the letter were addressed such as gray water reuse, green roofs and solar panels. Ms. Heller noted that many of those items will be addressed as site plans for the project are reviewed.

Ms. Hilgert noted that the project will include an enhanced building envelope, indigenous plants, minimal internal finishes, and bicycle racks, among other elements. Ms. Smith noted impacts on neighboring businesses such as street closures.

The motion passed. Ms. Heller abstained.

**ACTION ITEM: Chapman Borough – Zoning Ordinance and Map**

Mr. Severson presented the Chapman Borough zoning ordinance and map which is the first zoning ordinance prepared by Chapman Borough.

Mr. Glickman called for a motion to accept the staff comments. Mr. Gallagher made the motion; Mr. Molchany seconded the motion. Mr. Glickman asked for any comments or questions. The motion passed.

Mr. Melnick presented the Comprehensive Planning Committee Summary Sheet, which included three zoning ordinance amendments for Fountain Hill Borough, Whitehall Township and Lower Macungie Township, and a zoning ordinance and map amendment for Lower Saucon Township. Mr. Glickman called for a motion to accept the staff comments on the summary sheet. Ms. Moore made the motion; Mr. Manges seconded the motion. Mr. Glickman asked for any comments or questions. Mr. Elbich asked about the minimum lot area proposed in Fountain Hill Borough. Ms. Seitz stated that this lot area reflects existing lot sizes in the applicable area. Ms. Bradley stated that this lot size is common for historic
boroughs. Mr. Brace noted that he has experience with his own residence having similar lot sizes to those proposed in Fountain Hill. Mr. Repasch noted that he is a resident of Fountain Hill, and the local comprehensive plan encourages the Borough to align its regulations with the actual community conditions. Mr. Glickman noted that like Mr. Brace he has experienced the same and that historic development pattern considerations should be included in the regulatory considerations of communities. The motion passed.

**ACTION ITEM: Comprehensive Planning Committee Summary Sheet**
Mr. Melnick presented the Comprehensive Planning Committee Summary Sheet, which included subdivision and land development amendments for Weisenberg and Upper Macungie Townships, and zoning amendments for the City of Allentown (2), and Upper Macungie, Lehigh, and Moore Townships.

Mr. Repasch made a motion to accept the Summary Sheet. Mr. Glickman asked for a second. Ms. Heller seconded the motion. Mr. Glickman asked for any comments or questions. There were none. The motion carried. Ms. Rader abstained from the proposals in Upper Macungie Township; Mr. Elbich abstained from the proposal in Weisenberg Township.

**Environment Committee:**

**ACTION ITEM: Weisenberg Township – Stormwater Management Ordinance**

Mr. Severson presented a review of the project, which proposes to consolidate its stormwater ordinances from both Act 167 and National Pollution Discharge System (NPDES)/Municipal Separate Storm Sewer System (MS4).

Mr. Glickman called for a motion to accept the staff comments. Mr. Melnick made the motion; Mr. Charles Elliott seconded the motion. Mr. Glickman asked for any comments or questions.

Mr. Molchany asked that the Lehigh County Conservation District be copied with the review. Motion passed with Mr. Elbich abstaining.

**ACTION ITEM: Environment Committee Summary Sheet**

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

**Transportation Committee:**

**INFORMATION ITEM: Walk Audit**

Mr. Martinez reported on the Walk Audit program noted that a launch event was held on April 25 along with the United Way of the Greater Lehigh Valley and the AARP. He explained what a walk audit contains. Mr. Neratko demonstrated the Walk Audit GIS tool.

**INFORMATION ITEM: Lehigh Valley Passenger Rail Analysis**

Ms. Bradley discussed the Lehigh Valley Passenger Rail Analysis which is being conducted by the LVTS and PaDot. The Analysis will be examining the feasibility of passenger rail service between the New York metropolitan area and the Lehigh Valley, and the Philadelphia metropolitan area and the Lehigh Valley. Part 1 and Initial Findings will be presented at the LVTS Technical Committee on May 17th.

**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 March which included 11 subdivisions, 25 development proposals, 15 reviews for Stormwater Management, and seven Municipal Ordinances and Maps for a total of 58 reviews. The reviews included 410 housing units and 746,301 square feet of non-residential development. Mr. Glickman asked for any comments or questions. There were none.

Annual update on the Lehigh Valley’s Industrial Market.
Mr. Dotta reported that the private sector industrial property owners combined are earning an estimated $881 million/year in industrial rents and $7.05 billion over the average 8-year lease term.

Highway Traffic Monitoring
Ms. Bradley provided the details of the March traffic counts. She presented the vehicle counts for State Route 22, State Route 33, Interstate78, and State Route 309, as well as the truck counts for Interstate-78 and State Route 22.

New Business:

INFORMATION ITEM: A report on the US Environmental Protection Agency’s Carbon Pollution Reduction Grant for Climate Action Planning.

Ms. Bradley reported that starting in the second half of 2021 the LVPC was admitted into the Pennsylvania Department of Environmental Protection’s Local Climate Action Program. In addition, we have been actively pursuing funding to update the Act 167 Stormwater Management Plans for all 16 Lehigh Valley Watersheds and create a single-regionwide green infrastructure ordinance.

Then in November 2021, Congress passed the Bi-Partisan Infrastructure Investment and Jobs Act or IIJA. This included two new infrastructure funding categories for Carbon Reduction and hazard mitigation, called Protect. The Carbon Reduction funding allow for the Metropolitan Planning Organization, LVTS to create a specific strategy to reduce carbon emissions in the transportation sector. That means a new $67,173,116 budget for planning and investments in carbon reducing projects by the LVTS. We will present more on this at an upcoming meeting.

The second funding stream from the IIJA is Protect for infrastructure resiliency associated with climate change. These dollars are formula funds sent to each State DOT. PENNDOT intends to keep at least the first two years of these dollars for state owned transportation infrastructure and we are active members of the Financial Guidance Working Group working with the DOT to advocate for a portion of these funds to go out to the regions. USDOT also released a federal notice of funding availability for a national discretionary grant for these funds yesterday. We are reviewing this to see if we will apply.

As we have been pursuing these initiatives we became aware that the Inflation Reduction Act passed by Congress included new Climate Action Planning funds that would allocated to the states and largest regions in the Nation. We are the 69th largest region and the top 67 largest were offered the opportunity for Carbon Pollution Reduction Program Block Grants. States were required to submit their Notice of Intent to apply by March 31st. All but four states did so. We had been advocating since we were very close in line for regions by size and the EPA decided to allocate the funds not accepted by states out to the next largest regions.

On Friday, April 14th in Harrisburg the LVPC was recognized as a $1 million receipt of these funds. We met with EPA and DEP already to discuss required coordination and next steps. 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 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. We expect to discuss this and the many dovetailing partner initiatives with the Environment and Transportation Committees over the next several years.

Executive Director’s Report:
Ms. Bradley stated that Pennsylvania WalkWorks recently opened a new grant window for municipalities that want to create more walkable communities. These are grants aimed strictly at municipalities and MPOs and the grants run up $35,000 to help communities devise active transportation plans with an emphasis on walking, biking, wheelchair accessibility and public transit. This is a Pennsylvania Department or Health program, so it’s about transportation and healthy living. The deadline to seek questions from the department is May 12 and the deadline to apply is May 26.

Also, time is running out to apply for this round of PennDOT’s electric vehicle infrastructure grants. PennDOT has $56 million available for the installation of charging sites in this first round of funding that is open to private and public entities, so long as they provide a 20% match and are within one mile of an approved alternative fuels corridor, though some exceptions will be allowed. I-78 and The Pennsylvania Turnpike are our alternative fuels corridors. There is lots more information through the PennDOT webpage.

Another funding source to keep in mind is the Transportation Alternatives Program, which specifically focuses on non-motorized transportation options such as walking, rolling and biking, as well as education of our children. Applications will be available on the TASA website May 10, there will be a webinar on May 24th and the actual application cycle will begin May 29th. This is a great opportunity for organizations and municipalities to fund projects that promote safe and accessible non-motorized transportation and education for all. More information will be available and updated shortly at the PennDOT TASA website, which can easily be found by searching PennDOT TASA.

The Pennsylvania Department of Community and Economic Development (DCED) has a Multimodal Transportation Fund that is available for projects that are specifically for multimodal development, rehabilitation and enhancement of transportation assets to existing streetscape, lighting, sidewalk enhancement, pedestrian safety, connectivity of transportation options for all modes of travel, including biking and walking. This funding is available to organizations and municipalities across Pennsylvania, and applications are open until July 31st. More information is available on the DCED website or by searching PA DCED Multimodal Transportation Fund.

PennDOT will also be accepting applications for the 2023 Automated Red-Light Enforcement (ARLE) Funding Program from June 1st through June 30th, 2023. The 2023 program will continue to prioritize safety enhancements considering both PennDOT’s Safety Network Screening methods for the project location and Crash Modification Factors associated with proposed improvements. If you want to go for one of these, you’ll need to do a few things soon because a pre-application scoping form is required prior to submitting an application. Scoping forms should be submitted via email to ARLE@pa.gov. The scoping form should be submitted no later than April 30, 2023 to allow time for PennDOT to review and provide feedback prior to the application period in June. The completed and reviewed scoping form must be uploaded as an attachment to the formal application submission.

The Charging and Fueling Infrastructure Discretionary Grant Program (CFI Program) is a new competitive grant program created by the Bipartisan Infrastructure Law to strategically deploy publicly accessible electric vehicle charging and alternative fueling infrastructure in the places people live and work, urban and rural areas alike, in addition to along designated Alternative Fuel Corridors (AFCs). This first round of funding makes $700 million from Fiscal Years 2022 and 2023 funding available to strategically deploy electric vehicle (EV) charging infrastructure and other fueling infrastructure projects in urban and rural communities in publicly accessible locations, including downtown areas and local neighborhoods, particularly in underserved and disadvantaged communities. Electric vehicle charging deployment is highlighted in FutureLV: The Regional Plan and we are quickly moving to see if we can form a partnership
with PPL to apply by the May 30 deadline. This program does require at least a 20% match which will likely be our indicator of eligibility to apply.

The Safe Streets and Roads for All Program, which is run by the U.S. Department of Transportation, provides funding to develop the tools to help strengthen a community's approach to roadway safety and is designed to meet the needs of diverse local, and regional communities that differ dramatically in size, location, and experience administering Federal funding. We are determining whether we will apply at this time.

Communications and Public Engagement:

**INFORMATION ITEM: Business Cycle Column**

In the column with the headline "Knowledge is Power: This Region Craves It" Becky talks about our in-person Lehigh Valley Government Academy Transportation and Planning Classes, how some of them are the most well-attended in Pennsylvania, as well as a Tech Assist program free to any municipality, that PennDOT holds out as a statewide model. That column can be found at mcall.com and lvpc.org/newslv. The next column is focused on why it's vital for us to act as a region and speak with a unified voice as the region competes with other regions and states for status, influence and funding. It is set to publish Sunday, April 30, but may show up online a few days sooner.

Mr. Assad summarized the most recent Business Cycle column that was published in the Sunday, March 26 Morning Call. That column's headline is "Knowledge is Power: This Region Craves It." Becky talks about our in-person Lehigh Valley Government Academy Transportation and Planning Classes, how some of them are the most well-attended in Pennsylvania, as well as a Tech Assist program free to any municipality, that PennDOT holds out as a statewide model. That column can be found at mcall.com and lvpc.org/newslv. The next column is focused on why it’s vital for us to act as a region and speak with a unified voice as the region competes with other regions and states for status, influence and funding. It is set to publish Sunday, April 30, but may show up online a few days sooner.

**INFORMATION ITEM: Plan Lehigh Valley radio show on WDIY NPR 88.1FM**

Mr. Assad summarized the most recent Plan Lehigh Valley 30-minute radio show that aired on April 3 and focused on efforts being done to make the region more walkable and bikeable. Joining Becky and me were LVPC Community Fellow Christian Martinez and Carmen Bell, who is director of aging at the United Way of the Greater Lehigh Valley. We talked about what appears to be a nationwide increase in aggressive driving since the Pandemic, and the efforts to make our communities more accessible to everyone, including seniors. Carmen and Christian also laid out their plans, in partnership with the AARP to do a series of walk audits designed to identify difficult corridors issue with the idea of finding solutions that can be addressed in our upcoming Transportation Safety plan. That 30-minute show is now streaming at lvpc.org and wdiy.org.

Mr. Assad stated that the next show will focus on regionalism and is scheduled to air at 6:30 pm, May 1.

**INFORMATION ITEM: Lehigh Valley Government Academy Classes**

Mr. Assad reminded everyone that our in-person Lehigh Valley Government Academy classes, in partnership with the Pennsylvania Municipal Planning Education Institute, are now in season. We just wrapped up a very full class for Zoning, and Community Planning classes will begin Tuesday, May 9. Each course consists of more than 10 hours of instruction on three consecutive weeknights from 5:30-9 pm. We still have a few seats available for Community Planning. After that, we have Subdivision and Land Development in September. And because Community Planning sold out so quickly last year, we'll
have an encore showing in October. These classes are key in training the next generation of community leaders. More information and registration is available at lvpc.org/lvga

On April 12 we had 28 students in our large conference room learning about Temporary Traffic Control (Work Zones), including students from Montgomery County and Wayne County, so clearly our LTAP education reach is far.

That class was so popular we scheduled another one for May 11th. This class emphasizes worker safety, including what to wear, safe work zone practices and how to set up an appropriate work zone. Our second most requested class, Erosion and Sediment control, is set for June 6, and there are still some seats left.

He also noted that we still offer virtual LTAP Classes, in partnership with PennDOT. May 4th brings a one-hour class for Speed Data Collection. May 11th is the temporary traffic control, and Bridge and Culvert Inspection for Municipalities is offered June 6.

Our new Municipal Stormwater Facilities Program class is being held on June 13th for the first time and finally we have on June 20th the stormwater Control Measures Operations and Maintenance (or O&M).

**ADJOURNMENT:**
Mr. Glickman stated that the next LVPC meeting is set to be virtual on May 25 at 7pm. Mr. Glickman then asked if there was a motion to adjourn the meeting and Mr. Molchany made a motion to adjourn. The meeting was adjourned.

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

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

RE: River Pointe Logistics Lot 1 – Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County

Dear Mr. Teel:

The subject application is a Land Use of Regional Significance under FutureLV: The Regional Plan in the ‘Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator’ land use category. The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings were virtual, and occurred on:

- LVPC Comprehensive Planning Committee Meeting
  - May 23, 2023 at 12:00 PM
- LVPC Full Commission Meeting
  - May 25, 2023 at 7:00 PM

The subject application is associated with the River Pointe Logistics planned industrial park development, consisting of 12 industrial buildings totaling 5,873,000 square feet on approximately 804 acres of land. The site of the larger industrial park is located approximately 600 feet southwest of the Township border with Portland Borough, bounded by River Road to the northeast, Pine Tree Lane to the southeast and Potomac Street to the southwest (parcel numbers C12 6 1, C12 6 2, C11 26 2, C11 31 1, C11 31 1A, C11 31 3-5, C12 3 4, C12 3 5, C12 6 1A, C12 6 3-8, C12 8 1A, C 12 5 6, D 11 5 1A 4 and D11 6 3). Parcel numbers for individual lots are to be determined with the pending subdivision.

A Master Plan Transportation Impact Study (TIS) was also reviewed for the project, dated January 2022. The TIS anticipates that 75% of the development will be filled by industrial park uses (a mix of manufacturing, services and warehousing), and 25% is anticipated to be high-cube fulfillment center warehousing. At full build out, the industrial park will generate an estimated 15,475 passenger car trips and 3,015 truck trips in a typical weekday.

The subject application submitted for review at this time proposed to construct a 610,000-square foot building on Lot 1 (67 acres). Lot 1 is the southeastern-most lot on the overall River Pointe site and is the first lot on the left side when entering River Point Drive off River Road.
The proposed building and the larger planned industrial park development aligns with the Township’s designated General Industrial zoning district for the area (I-2), is in a Local Economic Revitalization Tax Assistance program (LERTA), and has the potential to provide numerous economic benefits to the Township and Lehigh Valley, including jobs and tax revenues. However, the size and scale of the project significantly surpasses any existing development and infrastructure in the surrounding area.

Numerous issues related to the overall industrial park are outstanding or unresolved, and aspects of the Lot 1 site design can be improved. The LVPC offers the following comments to support the Township in leveraging this development opportunity while minimizing adverse impacts on municipal character, infrastructure and quality of life, as well as the impacts to adjacent communities, meet the needs of the developer, and align with FutureLV: The Regional Plan:

**Multimodal Connectivity**
The ability of the workforce to use a variety of transportation modes to access the site is imperative to the long-term success of the proposal. Thousands of employees are anticipated upon full build-out of the industrial park, and the vicinity lacks the housing needed to support so many workers, resulting in extended commutes from surrounding communities, including Monroe County to the north and Warren County to the east (New Jersey).
Sidewalks
The LVPC commends the included sidewalks adjacent to the passenger vehicle parking areas and proposed building, and the sidewalks and crosswalks included along the River Pointe Drive property frontage. However, no connection is provided between the interior sidewalks and those along River Pointe Drive, posing a safety concern for pedestrians of all abilities. Additionally, no sidewalk is provided along the River Road property frontage. Employees, truck drivers and visitors to the building are likely to need pedestrian access from the building site to the rest of development and points beyond, especially persons that are being picked-up and dropped-off or walking from the park and ride lot not far from the development. In addition, people may wish to walk outside during break times, which has become a key factor for employee recruitment and retention and consequently business viability and leasability. Recruiting and maintaining tenants is increasingly complicated as post-Pandemic reductions in businesses across the globe, especially, in the warehousing, e-commerce and logistics sectors is adding an additional level of complication to the industrial commercial real estate market. While the area surrounding the project site lacks pedestrian infrastructure, taking the opportunity to install improvements at the time of land development supports the fiscal health and sustainability of the Township (of Policy 4.6) and is a precursor to additional modes of transportation, such as transit. Providing connected pedestrian infrastructure is strongly recommended (of FutureLV Policy 5.3).

Bicycle Infrastructure
Bicycles provide many workers with a low-cost mode of transportation with added health benefits. Bicycle storage racks should be installed in a convenient location at the proposed building to support mixed-transportation integration (of Policies 2.2 and 5.2).

Transit
Transit service is key to employment in the Lehigh Valley by playing a critical role in the ability for the workforce to travel to and from work. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation is essential to the economic success of this development, and to remove barriers to employment (of Policy 4.3). It is imperative that the Township consider all economic implications this proposal poses to ‘the infrastructure system, economy, tax base, environment and community’ (of Policy 2.4).

The Lehigh and Northampton Transportation Authority (LANTA) does not provide fixed-route transit service to the project site and vicinity. The nearest LANTA fixed-route service ends in Bangor and Roseto boroughs, approximately nine miles west of the project site on River Road. LANTA has no plans to extend service to serve the project site in the near future, however given the proposed employment uses on the site, LANTA anticipates service requests in the vicinity. LANTA strongly recommends including a comprehensive pedestrian network within the River Pointe complex, particularly along the main River Pointe Drive, and along the proposed entrance driveways from River Pointe Drive to the main employee entrances of the individual facilities. LANTA also recommends significant pedestrian connectivity and/or shuttle service to the nearby Portland Park and Ride to coordinate with other multimodal services.

LANTA recommends further engagement with Molly Wood, LANTA Planner/Land Use Specialist at mwood@lantabus-pa.gov to discuss any additional bus stop details.
Ride Share
Rideshare has emerged as an increasingly used mode of travel, especially by those that do not own a car or who share a vehicle with their household. A specific drop-off and pick-up location internal to the site should be provided with a covered waiting area with seating similar to a bus shelter, trash receptacles and lighting that allow employees safe access to the site. These types of drop-off and pick-up locations support individual, ride share (e.g., Uber, Lyft) and even future transit service in a coordinated manner. A good example of this type of worker safety and transportation management facility exists at the Amazon Fulfillment Facility at 1610 Van Buren Road, Easton.

Outdoor Recreation and Landscaping
The LVPC commends the proposed onsite walking trail located to the southwest of the proposed building, however no connection is provided from the proposed building. A clear designated pedestrian path should facilitate this connection and be part of the site’s internal pedestrian network to ensure employees and visitors have the opportunity to use outdoor recreation facilities provided throughout the industrial park (of Policies 1.1, 2.3 and 5.2).

Additionally, the LVPC strongly recommends connecting the proposed walking trail to a pedestrian network along River Road. Upper Mount Bethel Township was studied for trail feasibility in the Two Rivers Area Greenway Trails Implementation Study (2009). Implementing trails and multimodal connectivity at the time of this development can facilitate future trail connections that will ultimately lead to an interconnected Slate Belt region (of Policy 5.3). Extending the trail along the southeastern emergency access driveway is one potential way of connecting the trail to River Road.

The LVPC commends the proposed trees along River Pointe Drive, and landscaping along the River Road side of the lot. The LVPC encourages retaining as many existing trees as possible, to ‘conserve and manage natural lands’ (Policy 3.1). Additional landscaping and expanding access to green spaces provides many benefits to mental and physical well-being, including reduced depression, anxiety and stress (of Policy 5.3).

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

The plans identify that Lot 1 will be served by central public water and central public sewer, and the overall site sketch plan conceptualizes an on-site wastewater treatment plant. The LVPC encourages continued coordination between the Township and developer to ensure the sewer system is ultimately overseen by a municipal authority. Privately owned systems historically have not been operated as well as public systems, and are often neglected due to the high long-term costs of maintenance, leading to system failure. Municipalities are ultimately responsible for the proper functioning of all systems within their borders. In the event where a central
sewage facility is approved by the municipality and the Pennsylvania Department of Environmental Protection (DEP) and remains private, the municipality should require significant assurances for proper long-term operation and maintenance (of Policy 3.2).

Emergency Access
The LVPC commends the inclusion of an emergency access driveway provided on the east side of the building, connecting to River Road. The ability for first responders and emergency services to utilize this driveway for response and evacuation is a key element to response times. This emergency access drive should be continually maintained throughout the year, including snow and ice removal, to ensure emergency responders are able to use it during periods of inclement weather. The bollards and gate at the River Road entrance point should be located where they are highly visible, making it clear that no access is intended, mitigating potential conflicts created by a vehicle attempting to pull in and having to back out onto River Road (of FutureLV Policies 2.2 and 5.1).

It is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).

Transportation Impacts
The subject application includes an overall Master Transportation Impact Study (TIS) dated January 2022 for the entire River Pointe Planned Industrial Park. The Institute of Transportation Engineers (ITE) Trip Generation Manual 11th Edition was utilized to estimate the number of trips generated by the overall River Pointe development across two phases. Phase One accounts for the cumulative development of Lots 1, 2 and 6 based on 75% as “Industrial Park” and 25% as “High Cube Fulfillment Warehouse – Non Sort”.

The submitted plans for “Lot 1” do not specify the actual land use of the building. To determine the estimated trips generated by Lot 1, the LVPC utilized the same percentage split between land use codes for Phase 1. Based on these estimates, Lot 1 will generate an average of 1,853 total vehicle trips per day, which includes 296 commercial vehicles:

<table>
<thead>
<tr>
<th>“Industrial Park”</th>
<th>“High Cube Fulfillment Warehouse – Non Sort”</th>
</tr>
</thead>
<tbody>
<tr>
<td>ITE Land Use Code 130</td>
<td>ITE Land Use Code 155</td>
</tr>
<tr>
<td>75% = 457,500 square feet</td>
<td>25% = 152,500 square feet</td>
</tr>
<tr>
<td>1,281 passenger vehicles</td>
<td>276 passenger vehicles</td>
</tr>
<tr>
<td>261 commercial vehicles</td>
<td>35 commercial vehicles</td>
</tr>
<tr>
<td><strong>1,542 total vehicles</strong></td>
<td><strong>311 total vehicles</strong></td>
</tr>
</tbody>
</table>

Page 3 of the Master TIS notes that ‘... when the first Land Development Plan located in the Planned Industrial Park is submitted the Developer shall submit a Traffic Impact Study that projects the impact of Development depicted on the Overall Conceptual Sketch Plan. Such Traffic Impact Study shall be updated when the actual development of such Planned Industrial Park differs in a material way from the development depicted on the Overall Conceptual Sketch Plan by proposing a use or uses that will generate more traffic than estimated in the original submitted Traffic Impact Study.’ As noted in the introduction to this review, the traffic impact study was last revised January 2022, and again it notes that as development is proposed revisions will occur. Development of an over 600,000 square foot building is certainly "material",...
especially given the land use and it’s need for significant transportation infrastructure in order to operate. Transportation impacts will affect privately-owned, Township-owned, Delaware River Joint Toll Bridge Commission-owned, Pennsylvania Department of Transportation-owned, New Jersey Department of Transportation-owned, Northampton County-owned, Monroe County-owned, Portland Borough-owned, Lower Mount Bethel Township-owned, East Bangor Borough-owned, Bangor Borough-owned, Washington Township-owned, Plainfield Township-owned, Pen Argyl Borough-owned and Wind Gap Borough-owned infrastructure, among others. The proposed development, in totality, is mega-regional in nature, and the largest single development the Lehigh Valley has seen in recent memory.

At a minimum, as each Lot 1 is proposed for development, the Master TIS should be updated at the preliminary plan stage with trip generation estimates based on the resulting land use. Reflection of true operations of facilities and transportation impacts is critical to not only accommodating the needs of site’s ultimate users but, managing the local and broader impacts of development. Not providing basic, common traffic impact information is irresponsible and will lead to significant transportation safety and emergency management concerns. Therefore, LVPC strongly advises the Township to require an updated TIS, in the clear, present and long-term interest of the public, health, safety and general welfare (FutureLV Policies 1.4, 2.4 and 2.6).

Freight and Commercial Vehicle Parking
Industrial uses such as proposed Lot 1 and the overall River Pointe Logistics Planned Industrial Park are commercial truck-centric operations, and providing all freight movement accommodations is vital to their successful operation.

The Lot 1 site plans show 92 “truck” spaces, however the proposed length of 55 feet is more suitable for trailers because a connected tractor-trailer is typically 70 feet in length. Truck parking spaces, including long-term spaces, are one essential element to provide drivers with a safe area to rest. Federal law regulates the hours of operation for commercial truck drivers, and truck parking demand far outpaces available safe and convenient locations to park. Truck parking options across the Lehigh Valley, the State of Pennsylvania, and the United States must be improved as a critical safety element for freight movements. 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 (of FutureLV Policy 2.4). It is recommended that if these are intended to be tractor-trailer parking spaces that the pavement markings and layout be configured to park a 70-foot truck within the space provided (of FutureLV policies 2.4 and 5.4).

Connected tractor-trailer parking is proposed in the medians of River Pointe Drive, though no driver accommodations are provided. Restrooms, garbage and recycling containers and lighting are essential supporting the health, safety and welfare of drivers while maintaining the environment and overall condition of the truck parking areas along River Pointe Drive. Driver break rooms and lounges are strongly recommended, furnished with tables and vending machines to provide drivers the ability to relax or plan their day in a climate-controlled 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.

Through the period of construction for each individual lot of the River Pointe Logistics project, no construction materials should be stored in the median of River Pointe Drive or impede the ability for trucks to safely park at these critical locations.
Environmental Transportation Mitigation
Tractor-trailer and trailer parking spaces should include 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, both 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).

Snow Removal
Snow removal equipment should be included in a safe and efficient area with the capacity to manage snow once on the ground. The removal of snow and ice from the tops of trailers and trucks is a transportation network safety process. 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. Drivers from southern regions and regions that do not typically have snow and ice may have trouble understanding the appropriate way to safely remove snow and ice as required. These amenities support truck drivers, community health and safety (of FutureLV Policy 3.4).

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

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

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

Numerous impediments to the success of the overall River Pointe Logistics project are outstanding, and must be resolved:

**Limited Transportation Capacity**
Transportation infrastructure capacity is limited in the vicinity of the project site and was not built to withstand high traffic volumes or heavy industrial vehicles. Vehicle traffic impacts are made worse by the lack of alternative transportation options. Ensuring that freight mobility is matched with appropriate infrastructure to accommodate it should occur prior to approving land development plans (of Policy 2.4).

- **Infrastructure Costs**
  Several critical issues are outstanding, including the rail overpass across River Road, and the need for a development management plan for the facility. The development management plan must formally designate and provide perpetual routing, signage and enforcement to ensure that the impacts of the development do not exacerbate existing or incited transportation safety and congestion concerns. These concerns are significant threats to the public health, safety and general welfare. If not addressed as the land development progresses, these threats will ultimately increase the burden to Township, Commonwealth, State of New Jersey, Federal Government, County, surrounding municipalities and others in the form of road and bridge upgrades and improvements, safety enhancements and transit needs.

  Transportation maintenance and improvements are paid for by all of these governments through taxes, which will need to increase over time to address the burdens a development of this scale will have on public infrastructure such as the transportation system and emergency management services. This is not a limited issue, or one far in the future. It is immediate and prescient to the development itself. Real estate transfer taxes are one-time, liquid fuels revenues are declining due to vehicle fuel efficiency and transition to alternative fueling technologies, and wage and employment taxes depend on the number of jobs and their corresponding salaries. State and federal dollars to address transportation infrastructure are focused on highways and increasingly limited as the State Legislature struggles to meet federal match requirements. The potential for this development to pay for itself now or into the future is questionable and understanding that public subsidy is limited or non-existent is an important factor to manage long-term impacts on the development itself and the public.

- **Rail Overpass**
  A Norfolk Southern rail line bridge crosses River Road in Portland Borough (PennDOT State Route 1039) located north of the project site. The current 13’ 8” clearance beneath this rail trestle poses a severe safety and mobility concern. All trucks must be directed to travel in this direction from the site, as the main access to both State Route 611 and Interstate 80 in New Jersey. Trucks get caught underneath or scrape the overpass multiple times per year, especially when road repaving reduces the amount of clearance underneath. The overpass in its current condition is not ideal nor in line with current design standards, considering the current standard maximum height of a commercial vehicle is 13’ 6” in Pennsylvania — a two-inch clearance. Ride height of the suspension of the chassis of trucks and trailers and road repaving with continual overlays can easily deviate three or more inches and would be detrimental to the integrity of the overpass if struck and compromise the safety of truck drivers.
River Road at the location of the Norfolk Southern overpass is a PennDOT-owned and maintained state road, identified as State Route 1039 Segment 40 Offset 0320.

The plans and TIS do not indicate how this site access and mobility challenge will be addressed. Additionally, the bridge opening is too narrow for two tractor-trailers to pass through safely. Because of the roadway’s proximity to the Delaware River and changing weather patterns as a result of climate change, this area is severely prone to flooding, and lowering the roadway to address clearance is not recommended. The LVPC strongly encourages the developer to continue exploring solutions to this issue, as well as continued dialog and coordination with the Township, Borough of Portland and PennDOT to study and engineer design alternatives to increase the overpass clearance to promote roadway safety and limit environmental impacts of development (of Policy 2.2
and 3.2). The LVPC recognizes this overpass as an obstacle that will severely limit the viability of the development. This is a practical matter that must be addressed, or the development will not function at a sustainable level.

- **Interstate 80 Access**
  Truck routes to Interstate 80 should be established and signed appropriately to provide safe and efficient freight movements (of Policy 2.4). The most efficient and least impactful travel route would be for truck and freight movements to cross the Delaware River at the Portland-Columbia Toll Bridge and connect to Interstate 80 in New Jersey. However, it is likely that trucks will utilize other roadways in the vicinity of the project site, and potential impacts to these roadways should be planned and mitigated.

- **Route 611 Impacts**
  State Route 611 is listed in the Congestion Management Process of 2016 as a 2040 future congested corridor from State Route 512 to the Delaware Avenue Ramps for the Portland-Columbia Toll bridge over the Delaware River. It identification as a future congested corridor, even before the project was proposed, is a concern for the mobility of people and freight through the area and associated potential worsening of air quality as a result of congestion. The proposed vehicle impacts from the overall development will accelerate the congested corridor sooner than anticipated.

It is strongly recommended that the Developer work with PennDOT, The Delaware River Joint Toll Bridge Commission (DRJTBC), Upper Mount Bethel Township and Portland Borough on mitigation and mobility as well as any safety improvements along State Route 611 to offset the dramatic increase in vehicle traffic and resulting congestion.

The submitted TIS anticipates that 20% of trucks and 15% passenger vehicles generated by the project will utilize State Route 611, equal to approximately 452 additional trucks and 3,095 additional passenger vehicles traveling on State Route 611 per day. While State Route 611 through and north of Portland Borough is truck-restricted, this restriction is only for 102-inch-wide twin trailers. 48-foot and 53-foot trailers, and 96-inch-wide tractor-trailers, are legally allowed to drive on State Route 611. The PennDOT Trucker’s Guide to Pennsylvania is available for more information: [https://www.dot.state.pa.us/public/pubsforms/Publications/TruckersMap.pdf](https://www.dot.state.pa.us/public/pubsforms/Publications/TruckersMap.pdf)

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

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

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

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

- **Route 33 Access**
  State Route 1002 known as “Uhler Road” through Forks Township and “Main Street” in Tatamy Borough will be impacted if trucks opt to travel further south on Route 611 to access Route 33. This is also a likely route for trucks traveling from the south to the development, by traveling from Route 22 to Route 33 and exiting at the Palmer/Tatamy interchange. Both state and locally owned roads in Lower Mount Bethel Township will also be affected.

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

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

As mentioned previously, it is paramount that the developer coordinate emergency access
configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).

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

The LVPC has copied appropriate representatives from the Slate Belt Multi-Municipal Plan to further ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4).

Sincerely,

Jillian Seitz      Brian Hite
Senior Community Planner     Transportation Planner

cc: Justin Coyle, PE, Upper Mount Bethel Township Engineer; Ed Nelson, Upper Mount Bethel Township Manager; Cindy Beck, Upper Mount Bethel Township Secretary; Steve Walsh, PE, Dynamic Engineering Consultants; Mary Ellen DeFranco, Bangor Borough Mayor; Bonnie Due, East Bangor Borough Secretary; Jennifer Smethers, Lower Mount Bethel Township Manager; Robin Zmoda, Pen Argyl Borough Manager; Glenn Borger, Plainfield Township Planning Commission Chair; Stephanie Steele, Portland Borough Council President; Kay Bucci, Portland Borough Council Vice President; Heather Fisher, Portland Borough Mayor; Cathy Martino, Roseto Borough Manager; Katie Purdue, Washington Township Secretary; Charles Dertinger, Washington Township Planning Commission Chair; Louise Firestone, Wind Gap Borough Manager; Tina Smith, Northampton County Director of Community and Economic Development; Joseph Resta, Delaware River Joint Toll Bridge Commission; Dean Ritter, DEP; Michael Tarconish, DEP; Michael Phillips, DEP; Molly Wood, LANTA Planner/Land Use Specialist; Derrick Herrmann, PennDOT District 5 Traffic Engineer; Cindy Kunnas, Delaware Greenway Partnership Executive Director; Dion Campbell, Northampton County Conservation District Director
May XX, 2023

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

RE: River Pointe Logistics Lot 2 – Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County

Dear Mr. Teel:

The subject application is a Land Use of Regional Significance under FutureLV: The Regional Plan in the ‘Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator’ land use category. The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings were virtual, and occurred on:

- LVPC Comprehensive Planning Committee Meeting
  o May 23, 2023 at 12:00 PM
- LVPC Full Commission Meeting
  o May 25, 2023 at 7:00 PM

The subject application is associated with the River Pointe Logistics planned industrial park development, consisting of 12 industrial buildings totaling 5,873,000 square feet on approximately 804 acres of land. The site of the larger industrial park is located approximately 600 feet southwest of the Township border with Portland Borough, bounded by River Road to the northeast, Pine Tree Lane to the southeast and Potomac Street to the southwest (parcel numbers C12 6 1, C12 6 2, C11 26 2, C11 31 1, C11 31 1A, C11 31 3-5, C12 3 4, C12 3 5, C12 6 1A, C12 6 3-8, C12 8 1A, C 12 5 6, D 11 5 1A 4 and D11 6 3). Parcel numbers for individual lots are to be determined with the pending subdivision.

A Master Plan Transportation Impact Study (TIS) was also reviewed for the project, dated January 2022. The TIS anticipates that 75% of the development will be filled by industrial park uses (a mix of manufacturing, services and warehousing), and 25% is anticipated to be high-cube fulfillment center warehousing. At full build out, the industrial park will generate an estimated 15,475 passenger car trips and 3,015 truck trips in a typical weekday.

The subject application submitted for review at this time proposes to construct a 701,100-square foot building on Lot 2 (50 acres). Lot 2 is located on the eastern edge of the River Pointe site and is the first lot on the right side when entering River Point Drive off River Road.
The proposed building and the larger planned industrial park development aligns with the Township’s designated General Industrial zoning district for the area (I-2), is in a Local Economic Revitalization Tax Assistance program (LERTA), and has the potential to provide numerous economic benefits to the Township and Lehigh Valley, including jobs and tax revenues. However, the size and scale of the project significantly surpasses any existing development and infrastructure in the surrounding area.

Numerous issues related to the overall industrial park are outstanding or unresolved, and aspects of the Lot 2 site design can be improved. The LVPC offers the following comments to support the Township in leveraging this development opportunity while minimizing adverse impacts on municipal character, infrastructure and quality of life, as well as the impacts to adjacent communities, meet the needs of the developer, and align with FutureLV: The Regional Plan:

**Multimodal Connectivity**
The ability of the workforce to use a variety of transportation modes to access the site is imperative to the long-term success of the proposal. Thousands of employees are anticipated upon full build-out of the industrial park, and the vicinity lacks the housing needed to support so
many workers, resulting in extended commutes from surrounding communities, including Monroe County to the north and Warren County to the east (New Jersey).

**Sidewalks and Trail Access**
The LVPC commends the included sidewalks adjacent to the passenger vehicle parking area and proposed building, however no connection is provided between the interior sidewalks and those along the opposite side of River Pointe Drive, posing a safety concern for pedestrians of all abilities. Employees, truck drivers and visitors to the building are likely to need pedestrian access from the building site to the rest of development and points beyond, especially persons that are being picked-up and dropped-off or walking from the park and ride lot not far from the development. In addition, people may wish to walk outside during break times, which has become a key factor for employee recruitment and retention and consequently business viability and leasability. Recruiting and maintaining tenants is increasingly complicated as post-Pandemic reductions in businesses across the globe, especially, in the warehousing, e-commerce and logistics sectors is adding an additional level of complication to the industrial commercial real estate market. Thoroughly providing connected pedestrian infrastructure is strongly recommended (of FutureLV Policy 5.3) by incorporating sidewalk along both access driveways connecting to the internal sidewalk. Crosswalks should be provided crossing River Pointe Drive to increase safety and raise awareness of pedestrian movements (of Policy 2.2). Providing safe connections between the proposed building and River Pointe Drive sidewalk also facilitates safe access to the nearby proposed on-site walking trail (of Policies 1.1, 2.3 and 5.2).

Additionally, no sidewalk is provided along the River Road property frontage. While the area surrounding the project site lacks pedestrian infrastructure, taking the opportunity to install improvements at the time of land development supports the fiscal health and sustainability of the Township (of Policy 4.6) and is a precursor to additional modes of transportation, such as transit. Providing sidewalk along River Road further supports connection to the proposed on-site walking trail. Upper Mount Bethel Township was studied for trail feasibility in the Two Rivers Area Greenway Trails Implementation Study (2009). Implementing trails and multimodal connectivity at the time of this development can facilitate future trail connections that will ultimately lead to an interconnected Slate Belt region (of Policy 5.3).

**Accessibility**
The Americans with Disabilities Act (ADA) spaces shown in the passenger vehicle parking lot are located offset from the building. The intent of ADA-compliant parking spaces is to have them located close to building entrances to minimize the effort required for a person with a disability to access the building. While building entrances are not shown on the plan, it is strongly recommended that the applicant ensure ADA parking spaces are located as close to the building entrances as possible.
Bicycle Infrastructure
Bicycles provide many workers with a low-cost mode of transportation with added health benefits. Bicycle storage racks should be installed in a convenient location at the proposed building to support mixed-transportation integration (of Policies 2.2 and 5.2).

Transit
Transit service is key to employment in the Lehigh Valley by playing a critical role in the ability for the workforce to travel to and from work. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation is essential to the economic success of this development, and to remove barriers to employment (of Policy 4.3). It is imperative that the Township consider all economic implications this proposal poses to ‘the infrastructure system, economy, tax base, environment and community’ (of Policy 2.4).

The Lehigh and Northampton Transportation Authority (LANTA) does not provide fixed-route transit service to the project site and vicinity. The nearest LANTA fixed-route service ends in Bangor and Roseto boroughs, approximately nine miles west of the project site on River Road. LANTA has no plans to extend service to serve the project site in the near future, however given the proposed employment uses on the site, LANTA anticipates service requests in the vicinity. LANTA strongly recommends including a comprehensive pedestrian network within the River Pointe complex, particularly along the main River Pointe Drive, and along the proposed entrance driveways from River Pointe Drive to the main employee entrances of the individual facilities. LANTA also recommends significant pedestrian connectivity and/or shuttle service to the nearby Portland Park and Ride to coordinate with other multimodal services.

LANTA recommends further engagement with Molly Wood, LANTA Planner/Land Use Specialist at mwood@lantabus-pa.gov to discuss any additional bus stop details.
Ride Share
Rideshare has emerged as an increasingly used mode of travel, especially by those that do not own a car or who share a vehicle with their household. A specific drop-off and pick-up location internal to the site should be provided with a covered waiting area with seating similar to a bus shelter, trash receptacles and lighting that allow employees safe access to the site. These types of drop-off and pick-up locations support individual, ride share (e.g., Uber, Lyft) and even future transit service in a coordinated manner. A good example of this type of worker safety and transportation management facility exists at the Amazon Fulfillment Facility at 1610 Van Buren Road, Easton.

Landscaping, Sustainability and Environmental Impacts
The LVPC commends the proposed trees along River Pointe Drive, and landscaping along the River Road side of the lot. The LVPC encourages retaining as many existing trees as possible, to ‘conserve and manage natural lands’ (Policy 3.1). Additional landscaping and expanding access to green spaces provides many benefits to mental and physical well-being, including reduced depression, anxiety and stress (of Policy 5.3).

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

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

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

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

The plans identify that Lot 2 will be served by central public water and central public sewer, and the overall site sketch plan conceptualizes an on-site wastewater treatment plant. The LVPC encourages continued coordination between the Township and developer to ensure the sewer system is ultimately overseen by a municipal authority. Privately owned systems historically have not been operated as well as public systems, and are often neglected due to the high long-term costs of maintenance, leading to system failure. Municipalities are ultimately responsible for the proper functioning of all systems within their borders. In the event where a central sewage facility is approved by the municipality and the Pennsylvania Department of Environmental Protection (DEP) and remains private, the municipality should require significant assurances for proper long-term operation and maintenance (of Policy 3.2).

Emergency Access
The inclusion of two access points supports ‘safe and secure community design and emergency management’ (of Policy 5.1) by facilitating efficient emergency management response should an incident occur. As the project moves forward, it is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1), especially in consideration of budget requirements for emergency response personnel, training and proper equipment to serve the scale of the building and overall project (of Policies 2.2 and 4.6).

Transportation Impacts
The subject application includes an overall Master Transportation Impact Study (TIS) dated January 2022 for the entire River Pointe Planned Industrial Park. The Institute of Transportation Engineers (ITE) Trip Generation Manual 11th Edition was utilized to estimate the number of trips generated by the overall River Pointe development across two phases. Phase One accounts for the cumulative development of Lots 1, 2 and 6 based on 75% as “Industrial Park” and 25% as “High Cube Fulfillment Warehouse – Non Sort”.

The submitted plans for “Lot 2” do not specify the actual land use of the building. To determine the estimated trips generated by Lot 2, the LVPC utilized the same percentage split between land use codes for Phase 1. Based on these estimates, Lot 2 will generate an average of 2,039 total vehicle trips per day, which includes 340 commercial vehicles:

<table>
<thead>
<tr>
<th>“Industrial Park”</th>
<th>“High Cube Fulfillment Warehouse – Non Sort”</th>
</tr>
</thead>
<tbody>
<tr>
<td>ITE Land Use Code 130</td>
<td>ITE Land Use Code 155</td>
</tr>
<tr>
<td>75% = 525,825 square feet</td>
<td>25% = 175,275 square feet</td>
</tr>
<tr>
<td>1,422 passenger vehicles</td>
<td>277 passenger vehicles</td>
</tr>
<tr>
<td>300 commercial vehicles</td>
<td>40 commercial vehicles</td>
</tr>
<tr>
<td><strong>1,722 total vehicles</strong></td>
<td><strong>317 total vehicles</strong></td>
</tr>
</tbody>
</table>

Page 3 of the Master TIS notes that ‘… when the first Land Development Plan located in the Planned Industrial Park is submitted the Developer shall submit a Traffic Impact Study that
projects the impact of Development depicted on the Overall Conceptual Sketch Plan. Such Traffic Impact Study shall be updated when the actual development of such Planned Industrial Park differs in a material way from the development depicted on the Overall Conceptual Sketch Plan by proposing a use or uses that will generate more traffic than estimated in the original submitted Traffic Impact Study.’ As noted in the introduction to this review, the traffic impact study was last revised January 2022, and again it notes that as development is proposed revisions will occur. Development of an over 600,000 square foot building is certainly “material”, especially given the land use and it’s need for significant transportation infrastructure in order to operate. Transportation impacts will affect privately-owned, Township-owned, Delaware River Joint Toll Bridge Commission-owned, Pennsylvania Department of Transportation-owned, New Jersey Department of Transportation-owned, Northampton County-owned, Monroe County-owned, Portland Borough-owned, Lower Mount Bethel Township-owned, East Bangor Borough-owned, Bangor Borough-owned, Washington Township-owned, Plainfield Township-owned, Pen Argyl Borough-owned and Wind Gap Borough-owned infrastructure, among others. The proposed development, in totality, is mega-regional in nature, and the largest single development the Lehigh Valley has seen in recent memory.

At a minimum, as each lot is proposed for development, the Master TIS should be updated at the preliminary plan stage with trip generation estimates based on the resulting land use. Reflection of true operations of facilities and transportation impacts is critical to accommodating the needs of the ultimate end and managing the local and broader impacts of development. Not providing basic, common traffic impact information is irresponsible and will lead to significant transportation safety and emergency management concerns. Therefore, LVPC strongly advises the Township to require an updated TIS, in the clear, present and long term interest of the public, health, safety and general welfare (FutureLV Policies 1.4, 2.4 and 2.6).

Freight and Commercial Vehicle Parking
Industrial uses such as proposed Lot 2 and the overall River Pointe Logistics Planned Industrial Park are commercial truck-centric operations, and providing all freight movement accommodations is vital to their successful operation.

The Lot 2 site plans show 155 “truck” spaces, however the proposed length of 55 feet is more suitable for trailers because a connected tractor-trailer is typically 70 feet in length. Truck parking spaces, including long-term spaces, are one essential element to provide drivers with a safe area to rest. Federal law regulates the hours of operation for commercial truck drivers, and truck parking demand far outpaces available safe and convenient locations to park. Truck parking options across the Lehigh Valley, the State of Pennsylvania, and the United States must be improved as a critical safety element for freight movements. 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 (of FutureLV Policy 2.4). It is recommended that if these are intended to be tractor-trailer parking spaces that the pavement markings and layout be configured to park a 70-foot truck within the space provided (of FutureLV policies 2.4 and 5.4).

Connected tractor-trailer parking is proposed in the medians of River Pointe Drive, though no driver accommodations are provided. Restrooms, garbage and recycling containers and lighting are essential supporting the health, safety and welfare of drivers while maintaining the environment and overall condition of the truck parking areas along River Pointe Drive. Driver break rooms and lounges are strongly recommended, furnished with tables and vending machines to provide drivers the ability to relax or plan their day in a climate-controlled 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.

Through the period of construction for each individual lot of the River Pointe Logistics project, no construction materials should be stored in the median of River Pointe Drive or impede the ability for trucks to safely park at these critical locations.

Environmental Transportation Mitigation
Tractor-trailer and trailer parking spaces should include 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, both 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).

Snow Removal
Snow removal equipment should be included in a safe and efficient area with the capacity to manage snow once on the ground. The removal of snow and ice from the tops of trailers and trucks is a transportation network safety process. 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. Drivers from southern regions and regions that do not typically have snow and ice may have trouble understanding the appropriate way to safely remove snow and ice as required. These amenities support truck drivers, community health and safety (of FutureLV Policy 3.4).

Overall Project - Outstanding or Unresolved Impediments
Numerous impediments to the success of the overall River Pointe Logistics project are outstanding, and must be resolved:

Limited Transportation Capacity
Transportation infrastructure capacity is limited in the vicinity of the project site and was not built to withstand high traffic volumes or heavy industrial vehicles. Vehicle traffic impacts are made worse by the lack of alternative transportation options. Ensuring that freight mobility is matched with appropriate infrastructure to accommodate it should occur prior to approving land development plans (of Policy 2.4).

- **Infrastructure Costs**
  Several critical issues are outstanding, including the rail overpass across River Road, and the need for a development management plan for the facility. The development management plan must formally designate and provide perpetual routing, signage and enforcement to ensure that the impacts of the development do not exacerbate existing or incited transportation safety and congestion concerns. These concerns are significant threats to the public health, safety and general welfare. If not addressed as the land development progresses, these threats will ultimately increase the burden to Township, Commonwealth, State of New Jersey, Federal Government, County, surrounding
municipalities and others in the form of road and bridge upgrades and improvements, safety enhancements and transit needs.

Transportation maintenance and improvements are paid for by all of these governments through taxes, which will need to increase over time to address the burdens a development of this scale will have on public infrastructure such as the transportation system and emergency management services. This is not a limited issue, or one far in the future. It is immediate and prescient to the development itself. Real estate transfer taxes are one-time, liquid fuels revenues are declining due to vehicle fuel efficiency and transition to alternative fueling technologies, and wage and employment taxes depend on the number of jobs and their corresponding salaries. State and federal dollars to address transportation infrastructure are focused on highways and increasingly limited as the State Legislature struggles to meet federal match requirements. The potential for this development to pay for itself now or into the future is questionable and understanding that public subsidy is limited or non-existent is an important factor to manage long-term impacts on the development itself and the public.

- **Rail Overpass**
  A Norfolk Southern rail line bridge crosses River Road in Portland Borough (PennDOT State Route 1039) located north of the project site. The current 13’ 8” clearance beneath this rail trestle poses a severe safety and mobility concern. All trucks must be directed to travel in this direction from the site, as the main access to both State Route 611 and Interstate 80 in New Jersey. Trucks get caught underneath or scrape the overpass multiple times per year, especially when road repaving reduces the amount of clearance underneath. The overpass in its current condition is not ideal nor in line with current design standards, considering the current standard maximum height of a commercial vehicle is 13’ 6” in Pennsylvania – a two-inch clearance. Ride height of the suspension of the chassis of trucks and trailers and road repaving with continual overlays can easily deviate three or more inches and would be detrimental to the integrity of the overpass if struck and compromise the safety of truck drivers.

River Road at the location of the Norfolk Southern overpass is a PennDOT-owned and maintained state road, identified as State Route 1039 Segment 40 Offset 0320.
View of Norfolk Southern bridge over State Route 1039 River Road looking North from Demi Road – LVPC Staff

State Route 1039 “River Road” under Norfolk Southern rail line bridge – Image capture courtesy of PennDOT VideoLog
The plans and TIS do not indicate how this site access and mobility challenge will be addressed. Additionally, the bridge opening is too narrow for two tractor-trailers to pass through safely. Because of the roadway’s proximity to the Delaware River and changing weather patterns as a result of climate change, this area is severely prone to flooding, and lowering the roadway to address clearance is not recommended. The LVPC strongly encourages the developer to continue exploring solutions to this issue, as well as continued dialog and coordination with the Township, Borough of Portland and PennDOT to study and engineer design alternatives to increase the overpass clearance to promote roadway safety and limit environmental impacts of development (of Policy 2.2 and 3.2). The LVPC recognizes this overpass as an obstacle that will severely limit the viability of the development. This is a practical matter that must be addressed, or the development will not function at a sustainable level.

- **Interstate 80 Access**
  Truck routes to Interstate 80 should be established and signed appropriately to provide safe and efficient freight movements (of Policy 2.4). The most efficient and least impactful travel route would be for truck and freight movements to cross the Delaware River at the Portland-Columbia Toll Bridge and connect to Interstate 80 in New Jersey. However, it is likely that trucks will utilize other roadways in the vicinity of the project site, and potential impacts to these roadways should be planned and mitigated.

- **Route 611 Impacts**
  State Route 611 is listed in the Congestion Management Process of 2016 as a 2040 future congested corridor from State Route 512 to the Delaware Avenue Ramps for the Portland-Columbia Toll bridge over the Delaware River. It identification as a future congested corridor, even before the project was proposed, is a concern for the mobility of people and freight through the area and associated potential worsening of air quality as a result of congestion. The proposed vehicle impacts from the overall development will accelerate the congested corridor sooner than anticipated.

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  State Route 1002 known as “Uhler Road” through Forks Township and “Main Street” in Tatamy Borough will be impacted if trucks opt to travel further south on Route 611 to access Route 33. This is also a likely route for trucks traveling from the south to the development, by traveling from Route 22 to Route 33 and exiting at the Palmer/Tatamy interchange. Both state and locally owned roads in Lower Mount Bethel Township will also be affected.

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

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

As mentioned previously, it is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).

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

The LVPC has copied appropriate representatives from the Slate Belt Multi-Municipal Plan to further ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4).

Sincerely,

Jillian Seitz      Brian Hite
Senior Community Planner     Transportation Planner

cc: Justin Coyle, PE, Upper Mount Bethel Township Engineer; Ed Nelson, Upper Mount Bethel Township Manager; Cindy Beck, Upper Mount Bethel Township Secretary; Steve Walsh, PE, Dynamic Engineering Consultants; Mary Ellen DeFranco, Bangor Borough Mayor; Bonnie Due, East Bangor Borough Secretary; Jennifer Smathers, Lower Mount Bethel Township Manager; Robin Zmoda, Pen Argyl Borough Manager; Glenn Borger, Plainfield Township Planning Commission Chair; Stephanie Steele, Portland Borough Council President; Kay Bucci, Portland Borough Council Vice President; Heather Fisher, Portland Borough Mayor; Cathy Martino, Roseto Borough Manager; Katie Purdue, Washington Township Secretary; Charles Dertinger, Washington Township Planning Commission Chair; Louise Firestone, Wind Gap Borough Manager; Tina Smith, Northampton County Director of Community and Economic Development; Joseph Resta, Delaware River Joint Toll Bridge Commission; Dean Ritter, DEP; Michael Tarconish, DEP; Michael Phillips, DEP; Molly Wood, LANTA Planner/Land Use Specialist; Derrick Herrmann, PennDOT District 5 Traffic Engineer; Cindy Kunnas, Delaware Greenway Partnership Executive Director; Dion Campbell, Northampton County Conservation District Director
May XX, 2023

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

RE: River Pointe Logistics Lot 6 – Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County

Dear Mr. Teel:

The subject application is a Land Use of Regional Significance under FutureLV: The Regional Plan in the ‘Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator’ land use category. The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings were virtual, and occurred on:

- LVPC Comprehensive Planning Committee Meeting
  - May 23, 2023 at 12:00 PM
- LVPC Full Commission Meeting
  - May 25, 2023 at 7:00 PM

The subject application is associated with the River Pointe Logistics planned industrial park development, consisting of 12 industrial buildings totaling 5,873,000 square feet on approximately 804 acres of land. The site of the larger industrial park is located approximately 600 feet southwest of the Township border with Portland Borough, bounded by River Road to the northeast, Pine Tree Lane to the southeast and Potomac Street to the southwest (parcel numbers C12 6 1, C12 6 2, C11 26 2, C11 31 1, C11 31 1A, C11 31 3-5, C12 3 4, C12 3 5, C12 6 1A, C12 6 3-8, C12 8 1A, C 12 5 6, D 11 5 1A 4 and D11 6 3). Parcel numbers for individual lots are to be determined with the pending subdivision.

A Master Plan Transportation Impact Study (TIS) was also reviewed for the project, dated January 2022. The TIS anticipates that 75% of the development will be filled by industrial park uses (a mix of manufacturing, services and warehousing), and 25% is anticipated to be high-cube fulfillment center warehousing. At full build out, the industrial park will generate an estimated 15,475 passenger car trips and 3,015 truck trips in a typical weekday.

The subject application submitted for review at this time proposed to construct a 600,750-square foot building on Lot 6 (41 acres). Lot 6 is located on the western side of the overall River
Pointe site with two access roads connecting on an unnamed roadway stemming from the River Pointe Drive cul-de-sac towards the northwest.

The proposed building and the larger planned industrial park development aligns with the Township’s designated General Industrial zoning district for the area (I-2), is in a Local Economic Revitalization Tax Assistance program (LERTA), and has the potential to provide numerous economic benefits to the Township and Lehigh Valley, including jobs and tax revenues. However, the size and scale of the project significantly surpasses any existing development and infrastructure in the surrounding area.

Numerous issues related to the overall industrial park are outstanding or unresolved, and aspects of the Lot 6 site design can be improved. The LVPC offers the following comments to support the Township in leveraging this development opportunity while minimizing adverse impacts on municipal character, infrastructure and quality of life, as well as the impacts to adjacent communities, meet the needs of the developer, and align with FutureLV: The Regional Plan:

**Multimodal Connectivity**

The ability of the workforce to use a variety of transportation modes to access the site is imperative to the long-term success of the proposal. Thousands of employees are anticipated
upon full build-out of the industrial park, and the vicinity lacks the housing needed to support so many workers, resulting in extended commutes from surrounding communities, including Monroe County to the north and Warren County to the east (New Jersey).

**Sidewalks and Accessibility**

While sidewalk is included adjacent to the passenger vehicle parking area and proposed building, no sidewalk is provided on the unnamed roadway connecting to River Pointe Drive, posing a safety concern for pedestrians of all abilities. Employees, truck drivers and visitors to the building are likely to need pedestrian access from the building site to the rest of development and points beyond, especially persons that are being picked-up and dropped-off or walking from the park and ride lot not far from the development. In addition, people may wish to walk outside during break times, which has become a key factor for employee recruitment and retention and consequently business viability and leasability. Recruiting and maintaining tenants is increasingly complicated as post-Pandemic reductions in businesses across the globe, especially, in the warehousing, e-commerce and logistics sectors is adding an additional level of complication to the industrial commercial real estate market. Sidewalks should be installed along the Lot 6 access driveways, connecting from the River Pointe Drive pedestrian network to the proposed building (of Policy 5.3). Taking the opportunity to install improvements at the time of land development supports the fiscal health and sustainability of the Township (of Policy 4.6).

**Bicycle Infrastructure**

Bicycles provide many workers with a low-cost mode of transportation with added health benefits. Bicycle storage racks should be installed in a convenient location at the proposed building to support mixed-transportation integration (of Policies 2.2 and 5.2).

**Transit**

Transit service is key to employment in the Lehigh Valley by playing a critical role in the ability for the workforce to travel to and from work. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation is essential to the economic success of this development, and to remove barriers to employment (of Policy 4.3). It is imperative that the Township consider all economic implications this proposal poses to ‘the infrastructure system, economy, tax base, environment and community’ (of Policy 2.4).

The Lehigh and Northampton Transportation Authority (LANTA) does not provide fixed-route transit service to the project site and vicinity. The nearest LANTA fixed-route service ends in Bangor and Roseto boroughs, approximately nine miles west of the project site on River Road. LANTA has no plans to extend service to serve the project site in the near future, however given the proposed employment uses on the site, LANTA anticipates service requests in the vicinity. LANTA strongly recommends including a comprehensive pedestrian network within the River Pointe complex, particularly along the main River Pointe Drive, and along the proposed entrance driveways from River Pointe Drive to the main employee entrances of the individual facilities. LANTA also recommends significant pedestrian connectivity and/or shuttle service to the nearby Portland Park and Ride to coordinate with other multimodal services.

LANTA recommends further engagement with Molly Wood, LANTA Planner/Land Use Specialist at mwood@lantabus-pa.gov to discuss any additional bus stop details.
Ride Share
Rideshare has emerged as an increasingly used mode of travel, especially by those that do not own a car or who share a vehicle with their household. A specific drop-off and pick-up location internal to the site should be provided with a covered waiting area with seating similar to a bus shelter, trash receptacles and lighting that allow employees safe access to the site. These types of drop-off and pick-up locations support individual, ride share (e.g., Uber, Lyft) and even future transit service in a coordinated manner. A good example of this type of worker safety and transportation management facility exists at the Amazon Fulfillment Facility at 1610 Van Buren Road, Easton.

Landscaping
Minimal landscaping is included in the site design. The LVPC recommends additional landscaping be provided to expand access to green spaces and benefit the mental and physical well-being of workers, and outdoor seating and tables should be provided for use during breaks (of Policy 5.3). The LVPC strongly encourages retaining as many existing trees as possible, to 'conserve and manage natural lands' (Policy 3.1).

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

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

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

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

The plans identify that Lot 6 will be served by central public water and central public sewer, and the overall site sketch plan conceptualizes an on-site wastewater treatment plant. The LVPC encourages continued coordination between the Township and developer to ensure the sewer system is ultimately overseen by a municipal authority. Privately owned systems historically have not been operated as well as public systems, and are often neglected due to the high long-term costs of maintenance, leading to system failure. Municipalities are ultimately responsible for the proper functioning of all systems within their borders. In the event where a central sewage facility is approved by the municipality and the Pennsylvania Department of Environmental Protection (DEP) and remains private, the municipality should require significant assurances for proper long-term operation and maintenance (of Policy 3.2).

**Emergency Access**

The inclusion of two access points supports ‘safe and secure community design and emergency management’ (of Policy 5.1) by facilitating efficient emergency management response should an incident occur. As the project moves forward, it is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1), especially in consideration of budget requirements for emergency response personnel, training and proper equipment to serve the scale of the building and overall project (of Policies 2.2 and 4.6).

**Transportation Impacts**

The subject application includes an overall Master Transportation Impact Study (TIS) dated January 2022 for the entire River Pointe Planned Industrial Park. The Institute of Transportation Engineers (ITE) Trip Generation Manual 11th Edition was utilized to estimate the number of trips generated by the overall River Pointe development across two phases. Phase One accounts for the cumulative development of Lots 1, 2 and 6 based on 75% as “Industrial Park” and 25% as “High Cube Fulfillment Warehouse – Non Sort”.

The submitted plans for “Lot 6” do not specify the actual land use of the building. To determine the estimated trips generated by Lot 6, the LVPC utilized the same percentage split between land use codes for Phase 1. Based on these estimates, Lot 6 will generate an average of 1,790 total vehicle trips per day, which includes 292 commercial vehicles:

<table>
<thead>
<tr>
<th>“Industrial Park”</th>
<th>“High Cube Fulfillment Warehouse – Non Sort”</th>
</tr>
</thead>
<tbody>
<tr>
<td>ITE Land Use Code 130</td>
<td>ITE Land Use Code 155</td>
</tr>
<tr>
<td>75% = 450,375 square feet</td>
<td>25% = 150,375 square feet</td>
</tr>
<tr>
<td>1,261 passenger vehicles</td>
<td>237 passenger vehicles</td>
</tr>
<tr>
<td>257 commercial vehicles</td>
<td>35 commercial vehicles</td>
</tr>
<tr>
<td><strong>1,518 total vehicles</strong></td>
<td><strong>272 total vehicles</strong></td>
</tr>
</tbody>
</table>
Page 3 of the Master TIS notes that ‘… when the first Land Development Plan located in the Planned Industrial Park is submitted the Developer shall submit a Traffic Impact Study that projects the impact of Development depicted on the Overall Conceptual Sketch Plan. Such Traffic Impact Study shall be updated when the actual development of such Planned Industrial Park differs in a material way from the development depicted on the Overall Conceptual Sketch Plan by proposing a use or uses that will generate more traffic than estimated in the original submitted Traffic Impact Study.’ As noted in the introduction to this review, the traffic impact study was last revised January 2022, and again it notes that as development is proposed revisions will occur. Development of an over 600,000 square foot building is certainly “material”, especially given the land use and it’s need for significant transportation infrastructure in order to operate. Transportation impacts will affect privately-owned, Township-owned, Delaware River Joint Toll Bridge Commission-owned, Pennsylvania Department of Transportation-owned, New Jersey Department of Transportation-owned, Northampton County-owned, Monroe County-owned, Portland Borough-owned, Lower Mount Bethel Township-owned, East Bangor Borough-owned, Bangor Borough-owned, Washington Township-owned, Plainfield Township-owned, Pen Argyl Borough-owned and Wind Gap Borough-owned infrastructure, among others. The proposed development, in totality, is mega-regional in nature, and the largest single development the Lehigh Valley has seen in recent memory.

At a minimum, as each lot is proposed for development, the Master TIS should be updated at the preliminary plan stage with trip generation estimates based on the resulting land use. Reflection of true operations of facilities and transportation impacts is critical to accommodating the needs of the ultimate end and managing the local and broader impacts of development. Not providing basic, common traffic impact information is irresponsible and will lead to significant transportation safety and emergency management concerns. Therefore, LVPC strongly advises the Township to require an updated TIS, in the clear, present and long term interest of the public, health, safety and general welfare (FutureLV Policies 1.4, 2.4 and 2.6).

Freight and Commercial Vehicle Parking
Industrial uses such as proposed Lot 6 and the overall River Pointe Logistics Planned Industrial Park are commercial truck-centric operations, and providing all freight movement accommodations is vital to their successful operation.

The Lot 6 site plans show 95 “truck” spaces, however the proposed length of 55 feet is more suitable for trailers because a connected tractor-trailer is typically 70 feet in length. Truck parking spaces, including long-term spaces, are one essential element to provide drivers with a safe area to rest. Federal law regulates the hours of operation for commercial truck drivers, and truck parking demand far outpaces available safe and convenient locations to park. Truck parking options across the Lehigh Valley, the State of Pennsylvania, and the United States must be improved as a critical safety element for freight movements. 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 (of FutureLV Policy 2.4). It is recommended that if these are intended to be tractor-trailer parking spaces that the pavement markings and layout be configured to park a 70-foot truck within the space provided (of FutureLV policies 2.4 and 5.4).

Connected tractor-trailer parking is proposed in the medians of River Pointe Drive, though no driver accommodations are provided. Restrooms, garbage and recycling containers and lighting are essential supporting the health, safety and welfare of drivers while maintaining the environment and overall condition of the truck parking areas along River Pointe Drive. Driver break rooms and lounges are strongly recommended, furnished with tables and vending machines to provide drivers the ability to relax or plan their day in a climate-controlled
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.

Through the period of construction for each individual lot of the River Pointe Logistics project, no construction materials should be stored in the median of River Pointe Drive or impede the ability for trucks to safely park at these critical locations.

**Environmental Transportation Mitigation**
Tractor-trailer and trailer parking spaces should include 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, both 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*).

**Snow Removal**
Snow removal equipment should be included in a safe and efficient area with the capacity to manage snow once on the ground. The removal of snow and ice from the tops of trailers and trucks is a transportation network safety process. 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. Drivers from southern regions and regions that do not typically have snow and ice may have trouble understanding the appropriate way to safely remove snow and ice as required. These amenities support truck drivers, community health and safety (of *FutureLV Policy 3.4*).

**Overall Project - Outstanding or Unresolved Impediments**
Numerous impediments to the success of the overall River Pointe Logistics project are outstanding, and must be resolved:

**Limited Transportation Capacity**
Transportation infrastructure capacity is limited in the vicinity of the project site and was not built to withstand high traffic volumes or heavy industrial vehicles. Vehicle traffic impacts are made worse by the lack of alternative transportation options. Ensuring that freight mobility is matched with appropriate infrastructure to accommodate it should occur prior to approving land development plans (of Policy 2.4).

- **Infrastructure Costs**
  Several critical issues are outstanding, including the rail overpass across River Road, and the need for a development management plan for the facility. The development management plan must formally designate and provide perpetual routing, signage and enforcement to ensure that the impacts of the development do not exacerbate existing or incited transportation safety and congestion concerns. These concerns are significant threats to the public health, safety and general welfare. If not addressed as the land development progresses, these threats will ultimately increase the burden to Township, Commonwealth, State of New Jersey, Federal Government, County, surrounding
municipalities and others in the form of road and bridge upgrades and improvements, safety enhancements and transit needs.

Transportation maintenance and improvements are paid for by all of these governments through taxes, which will need to increase over time to address the burdens a development of this scale will have on public infrastructure such as the transportation system and emergency management services. This is not a limited issue, or one far in the future. It is immediate and prescient to the development itself. Real estate transfer taxes are one-time, liquid fuels revenues are declining due to vehicle fuel efficiency and transition to alternative fueling technologies, and wage and employment taxes depend on the number of jobs and their corresponding salaries. State and federal dollars to address transportation infrastructure are focused on highways and increasingly limited as the State Legislature struggles to meet federal match requirements. The potential for this development to pay for itself now or into the future is questionable and understanding that public subsidy is limited or non-existent is an important factor to manage long-term impacts on the development itself and the public.

- **Rail Overpass**
  A Norfolk Southern rail line bridge crosses River Road in Portland Borough (PennDOT State Route 1039) located north of the project site. The current 13’ 8” clearance beneath this rail trestle poses a severe safety and mobility concern. All trucks must be directed to travel in this direction from the site, as the main access to both State Route 611 and Interstate 80 in New Jersey. Trucks get caught underneath or scrape the overpass multiple times per year, especially when road repaving reduces the amount of clearance underneath. The overpass in its current condition is not ideal nor in line with current design standards, considering the current standard maximum height of a commercial vehicle is 13’ 6” in Pennsylvania – a two-inch clearance. Ride height of the suspension of the chassis of trucks and trailers and road repaving with continual overlays can easily deviate three or more inches and would be detrimental to the integrity of the overpass if struck and compromise the safety of truck drivers.

River Road at the location of the Norfolk Southern overpass is a PennDOT-owned and maintained state road, identified as State Route 1039 Segment 40 Offset 0320.
The plans and TIS do not indicate how this site access and mobility challenge will be addressed. Additionally, the bridge opening is too narrow for two tractor-trailers to pass through safely. Because of the roadway’s proximity to the Delaware River and changing weather patterns as a result of climate change, this area is severely prone to flooding, and lowering the roadway to address clearance is not recommended. The LVPC strongly encourages the developer to continue exploring solutions to this issue, as well as continued dialog and coordination with the Township, Borough of Portland and PennDOT to study and engineer design alternatives to increase the overpass clearance to promote roadway safety and limit environmental impacts of development (of Policy 2.2 and 3.2). The LVPC recognizes this overpass as an obstacle that will severely limit the viability of the development. This is a practical matter that must be addressed, or the development will not function at a sustainable level.

- **Interstate 80 Access**
  Truck routes to Interstate 80 should be established and signed appropriately to provide safe and efficient freight movements (of Policy 2.4). The most efficient and least impactful travel route would be for truck and freight movements to cross the Delaware River at the Portland-Columbia Toll Bridge and connect to Interstate 80 in New Jersey. However, it is likely that trucks will utilize other roadways in the vicinity of the project site, and potential impacts to these roadways should be planned and mitigated.

- **Route 611 Impacts**
  State Route 611 is listed in the Congestion Management Process of 2016 as a 2040 future congested corridor from State Route 512 to the Delaware Avenue Ramps for the Portland-Columbia Toll bridge over the Delaware River. It identification as a future congested corridor, even before the project was proposed, is a concern for the mobility of people and freight through the area and associated potential worsening of air quality as a result of congestion. The proposed vehicle impacts from the overall development will accelerate the congested corridor sooner than anticipated.
It is strongly recommended that the Developer work with PennDOT, The Delaware River Joint Toll Bridge Commission (DRJTBC), Upper Mount Bethel Township and Portland Borough on mitigation and mobility as well as any safety improvements along State Route 611 to offset the dramatic increase in vehicle traffic and resulting congestion.

The submitted TIS anticipates that 20% of trucks and 15% passenger vehicles generated by the project will utilize State Route 611, equal to approximately 452 additional trucks and 3,095 additional passenger vehicles traveling on State Route 611 per day. While State Route 611 through and north of Portland Borough is truck-restricted, this restriction is only for 102-inch-wide twin trailers. 48-foot and 53-foot trailers, and 96-inch-wide tractor-trailers, are legally allowed to drive on State Route 611. The PennDOT Trucker’s Guide to Pennsylvania is available for more information: https://www.dot.state.pa.us/public/pubsforms/Publications/TruckersMap.pdf

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

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

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

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

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

- **Route 33 Access**
  State Route 1002 known as “Uhler Road” through Forks Township and “Main Street” in
Tatamy Borough will be impacted if trucks opt to travel further south on Route 611 to access Route 33. This is also a likely route for trucks traveling from the south to the development, by traveling from Route 22 to Route 33 and exiting at the Palmer/Tatamy interchange. Both state and locally owned roads in Lower Mount Bethel Township will also be affected.

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

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

As mentioned previously, it is paramount that the developer coordinate emergency access configurations with Upper Mount Bethel Township emergency services departments and providers to 'enhance planning and emergency response efforts among emergency management personnel' (of Policy 5.1).

**Multimodal and Trail Access**
The area surrounding the project site lacks pedestrian infrastructure, a crucial element affecting the long-term success and viability of the development. Taking the opportunity to install improvements at the time of land development supports the fiscal health and sustainability of the Township (of Policy 4.6) and is a precursor to additional modes of transportation, such as transit and trail connectivity.

Upper Mount Bethel Township was studied for trail feasibility in the Two Rivers Area Greenway Trails Implementation Study (2009). The LVPC strongly recommends the proposed on-site walking trail be connected to a pedestrian network along River Road. Implementing trails and multimodal connectivity at the time of this development can facilitate future trail connections that will ultimately lead to an interconnected Slate Belt region (of Policy 5.3).
Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

The LVPC has copied appropriate representatives from the Slate Belt Multi-Municipal Plan to further ‘coordinate land use decisions across municipal boundaries’ (Policy 1.4).

Sincerely,

Jillian Seitz  
Senior Community Planner

Brian Hite  
Transportation Planner

cc: Justin Coyle, PE, Upper Mount Bethel Township Engineer; Ed Nelson, Upper Mount Bethel Township Manager; Cindy Beck, Upper Mount Bethel Township Secretary; Steve Walsh, PE, Dynamic Engineering Consultants; Mary Ellen DeFranco, Bangor Borough Mayor; Bonnie Due, East Bangor Borough Secretary; Jennifer Smethers, Lower Mount Bethel Township Manager; Robin Zmoda, Pen Argyl Borough Manager; Glenn Borger, Plainfield Township Planning Commission Chair; Stephanie Steele, Portland Borough Council President; Kay Bucci, Portland Borough Council Vice President; Heather Fisher, Portland Borough Mayor; Cathy Martino, Roseto Borough Manager; Katie Purdue, Washington Township Secretary; Charles Dertinger, Washington Township Planning Commission Chair; Louise Firestone, Wind Gap Borough Secretary; Tina Smith, Northampton County Director of Community and Economic Development; Joseph Resta, Delaware River Joint Toll Bridge Commission; Dean Ritter, DEP; Michael Tarconish, DEP; Michael Phillips, DEP; Molly Wood, LANTA Planner/Land Use Specialist; Derrick Herrmann, PennDOT District 5 Traffic Engineer; Cindy Kunnas, Delaware Greenway Partnership Executive Director; Dion Campbell, Northampton County Conservation District Director
May 10, 2023

Mr. Dale Traupman, Chair
Hanover Township Planning Commission
3630 Jacksonville Road
Bethlehem, PA 18017

Re: Arcadia Development Corp. 300 Gateway Dr.
Land Use of Regional Significance
Hanover Township
Northampton County

Dear Mr. Traupman:

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

- LVPC Comprehensive Planning Committee Meeting
  - May 23, 2023, at 12:00 PM
- LVPC Full Commission Meeting
  - May 25, 2023, at 7:00 PM

The subject applicant proposes consolidation of two parcels into one and construction of a 250,290 square foot warehouse located at 300 Gateway Drive (PIN M6-15-11, M6-15-11C).

The LVPC offers the following comments:

**Reuse and Redevelopment in Urban Areas**

The proposed development fulfills the intent of FutureLV the Regional Plan to ‘encourage reuse and redevelopment within urban areas’ (Policy 1.1) by repurposing the parcel in this location with the existing development.

**Character-Defining Area**

The undeveloped parcel, parcel identification number M6 15 11C, is part of a Character-Defining Area. Character-Defining Areas represent the natural and scenic character of the Lehigh Valley as a simplified version of the Natural Resources Plan, with highest
elevation areas representing scenic resources. The types of uses recommended for these areas are parks and open space, woodlands, agriculture, and low-intensity, limited scale development that preserves natural and scenic resources.

**Karst**
Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karsts in the form of surface depressions 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).

**Truck Amenities**
The LVPC applauds the developer for integrating commercial truck amenities into the project plans including a truck driver lounge and amenities area within the building, truck parking spaces for the truck driver lounge, and truck/trailer snow removal equipment area.

The LVPC recommends that electrical hookup infrastructure for the tractor-trailer and trailer parking / dock spaces be considered to limit tractor-trailer idling and improve air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling law (of FutureLV the Regional Plan, Policies 3.2 and 1.3).

Truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary charging infrastructure. 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 Policies 2.5 and 3.4) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.

**Traffic and Driver Impacts**
The LVPC commends the use of the Land Use Code 150 “Warehousing” from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th edition in the Traffic Impact Study as this provides a wide range of warehousing calculation formulas within it. This is important for characterizing the proposed impacts for warehousing and logistics projects without an identified end user.

The LVPC recommends that directional signage within the complex be added to help facility patrons navigate the correct routes since the western driveway for the Embassy Bank / Hampton Inn is proposed for removal.

On-site truck route signage should be provided to communicate the safest and most efficient access to State Route 22, 33, 191 and 412, 987 (Airport Road), and Interstates 78, 80 and 476. (of FutureLV policy 2.4).
Route 22 in this location is listed as a current and future priority congested corridor in the Congested Management Process (CMP 2016). Projects that will increase traffic congestion along the corridor should mitigate these impacts. The municipality and developer should engage with the Pennsylvania Department of Transportation (PennDOT) on mitigation recommendations for traffic congestion and to improve traffic flow along Route 191 in the vicinity of the project.

Route 22 and associated ramps for ingress and egress to Route 512 are under construction for resurfacing as a Lehigh Valley Transportation Study (LVTS) Transportation Improvement Program (TIP) project MPMS Identification number 110070. The LVPC recommends that the developer coordinate with PennDOT and its project management consultants to avoid negative impacts on the TIP and the proposed project (of Policies 2.2 and 3.2).

**Mixed-Transportation Network**

Hanover Township, Northampton County is listed as an emerging Center in the Transportation Plan of FutureLV the Regional Plan. Centers are connected via Corridors. This proposed development utilizes Route 512, 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.

The LVPC strongly recommends that, if possible, a pathway or sidewalk connection from the proposed development to the sidewalk the runs along Highland Avenue, be incorporated into the plans. This is especially important for the proposed location. Near to the project site is access to public transportation on Highland Avenue, which runs one street north to the proposed land development on Gateway Drive. These two roads can be seen in the image below taken from Google Maps.
The ingress/egress of Gateway Drive onto Bath Pike (Route 512) which connects these two roads are pedestrian prohibited and there are no sidewalks along Route 512. This will make it difficult for any employees who use public transportation to access the location without illegally and dangerously walking along Route 512 from the bus stops on Highland Avenue.

If a connection for pedestrians could be made through the private property between the project site and the bus stops on Highland Avenue, it would support enhancing transit connections to improve mobility and job access (of Policy 2.3) as well as promote ‘safe and secure community design’ (Policy 5.1), and work to ‘increase economic access to daily needs for all people’ (of Policy 5.2).

The LVPC also recommends a pedestrian circulation plan for employee movements within the eastern employee parking lot and into the building entrances. Appropriate pavement markings should be installed to communicate proper routes for employees and for vehicles to be alerted to potential pedestrians.
The LVPC also suggests that sidewalks be incorporated along the perimeter of the warehouse to provide a safe location for employees and truck drivers to walk during breaks. This would serve as a recreational trail for employees and truck drivers and would promote health and wellness onsite (Policy 5.3).

The LVPC recommends that to 'enhance public transit service, pedestrian, and bicycle facilities along Corridors' (Policy 2.3) that a bicycle rack be included in a safe location adequately illuminated by light in relative proximity to employee entrances (of FutureLV policies 2.3, 5.2 and 5.3) for any employees who may use a bicycle for their commute either whole or in combination with public transportation.

**The Lehigh and Northampton Transportation Authority (LANTA)**

LANTA currently does not provide public transportation to the project site on Gateway Drive, or along its nearest main corridor, Route 512 (Bath Pike). There are also no sidewalks along Gateway Drive or Route 512.

Given the proposed use of the 250,290-square foot industrial facility, LANTA anticipates future employees needing transit by means of transportation to the site. However, LANTA has no plans to deviate service on Gateway Drive. There is a westbound/eastbound bus stop pairing on Highland Avenue, less than .2 miles north of the project site, which was shown in the previous image. If this could be made accessible through the private property in between the project site and the bus stops on Highland Avenue, transit riders could safely access the project location and public transport.

The LVPC strongly recommends coordinating with the adjacent property to allow for a pedestrian connection from the project site to the Highland Avenue sidewalk to access the existing bus stops. This solution would deter transit riders from dangerously walking on Route 512 to access the project site on Gateway Drive.

The LVPC recommends follow up with LANTA Transportation/Land Use Planner Molly Wood at mwood@lantabus-pa.gov to discuss any additional bus stop details.

**Stormwater Review**

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

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.
Sincerely,

Bambi Griffin Rivera
Senior Community and Regional Planner

cc: Richard Thulin, Applicant;
The Pidcock Company – Bruce Anderson, Project Engineer/Surveyor;
Brien Kocher, P.E., Township/Borough 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;
Dean Severson, AICP, LVPC Director of Regional Planning
May 12, 2023

Mr. Ian Heck, Chair  
Forks Township Planning Commission  
1606 Sullivan Trail  
Easton, PA 18040

Re: Legacy at Sullivan Trail – Land Use of Regional Significance  
Forks Township  
Northampton Township

Dear Mr. Heck:

The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the large Residential Development and Mixed-Use development categories. The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings will be virtual, and occur on:

- **LVPC Comprehensive Planning Committee Meeting**
  - May 23, 2023, at 12:00 PM
  - [https://www.lvpc.org/meetings](https://www.lvpc.org/meetings)

- **LVPC Full Commission Meeting**
  - May 25, 2023, at 7:00 PM
  - [https://www.lvpc.org/meetings](https://www.lvpc.org/meetings)

The subject applicant proposes consolidation of four lots into one lot and the construction of 19 apartment and two mixed-use buildings for a total of 420 apartments, 14,000 square-feet of retail/commercial space, and 14,000 square-feet of office space with a recreational center located on Sullivan Trail north of the intersection with Uhler Road (PINs: J9-8-6, J9-8-7, J8-18-7, and J8-20-3).

The LVPC offers the following comments:

**Multimodal Accessibility**

- **Multimodal Accessibility Buffer**

The proposed development is within a Multimodal Accessibility Buffer. These areas are opportunities that the LVPC highly encourages for expansion, improvements, or
connections to the mixed-transportation network during development or redevelopment activities (of Policy 2.1).

- **Pedestrian Connectivity**

  The LVPC commends the developer for providing sidewalks and pavement marked crosswalks throughout the proposal which ‘promotes safe and secure community design’ (Policy 5.1) and will help to create a pedestrian friendly community space that promotes physical and mental health (Policy 5.3).

  The LVPC recommends that the developer and municipality engage as soon as possible with Norfolk Southern Corporation on coordination of pedestrian infrastructure across their rail line as shown on the plans (of Policy 5.3).

  The municipality and the Pennsylvanian Department of Transportation (PennDOT) should also engage with Norfolk Southern Corporation on any rail crossing upgrades or safety improvements that may be required at the existing rail crossing across State Route 2025 (Sullivan Trail) (of Policy 2.4).

- **Bicycle Racks**

  Including parking for bicycles supports a safe, healthy, inclusive, and livable community (FutureLV the Regional Plan, Goal 5). The inclusion of bicycle racks also helps to ensure transportation accessibility for all persons, (of Policy 5.2), and integrates mixed-transportation into the design (of Policy 5.2). The LVPC recommends that bicycle racks be incorporated into the vehicle parking lots, and into the in the parking lot of the recreation center as residents may choose to bike to the center rather than drive a car.

- **Lehigh and Northampton Transportation Authority (LANTA)**

  The Lehigh and Northampton Transportation Authority (LANTA) provides public transportation in close proximity to the project site, with a northbound/southbound bus stop pairing at the Sullivan Trail and Church Lane intersection, approximately .30 miles north of the project site, and a westbound/eastbound bus stop pairing in front of the adjacent Wells Fargo Bank on Uhler Road, far side of the Sullivan Trail intersection, approximately .25 miles south of the project site. Given the proposed mixed-use development planned for the project site, including several multi-unit apartment buildings, LANTA anticipates service requests at this location.

  The proposed plan includes a comprehensive pedestrian network within the Legacy at Sullivan Trail complex, as well as new sidewalks along the property frontage on Sullivan Trail. LANTA appreciates all efforts to include a proposed five-foot concrete pad between the sidewalk and the curb for a proper bus stop landing pad, far side of the exit driveway, and a ten-foot by six-foot concrete pad fronting the sidewalk for a future bus shelter at the bus stop location. This will be a heavily used bus stop for the Township and providing access to a proper bus stop will benefit all users of the site.
The LVPC recommends further engagement with LANTA Land Use/Transportation Planner Molly Wood at mwood@lantabus-pa.gov to discuss any additional bus stop details.

- **School Bus Placement**

  The Easton Area School District should be consulted as to school bus stop requirements for the development, to ensure safe waiting areas for students (Policy 5.2).

- **Centers and Corridors**

  The proposal is anticipated to generate 3,745 trips per day. State Route 2025 (Sullivan Trail) along the frontage of the project location as well as State Route 1002 (Uhler Road) are both listed as Corridors in the Transportation plan of *FutureLV: The Regional Plan*. The Sullivan Trail Corridor links the emerging Center of Forks Center and the historic Center of Stockertown. The Uhler Road Corridor links the historic Center of Tatamy to the emerging Center of Forks. These Corridors also identify “Multimodal Accessibility Buffer Areas” from *FutureLV*.

  The Traffic Impact Study Addendum Sensitivity Analysis provided with the submission to the LVPC indicates a desire by the developer to delay construction of dedicated left turn lanes at the offsite intersection of State Route 2025 (Sullivan Trail) and State Route 1006 (Uhler Road) until 190 Apartments are occupied. The LVPC recommends that these off-site PennDOT improvements by the developer be constructed in a time frame in order to mitigate impacts to the intersection from the increase of traffic from the project. Crash data for 2022 shows five crashes at this location from the public version of the Pennsylvania Crash Information Tool (PCIT). Therefore, this recommendation supports both Policies 2.2 to 'provide a safe, well-maintained transportation network' and Policy 2.6 ‘to improve transportation performance measures.’

- **Emergency Access**

  The emergency access proposed on “Brooke Drive” (Access Road B) should be maintained to be fully accessible at all times, including during winter weather events where access may be diminished due to snow cover. Immediate access for emergency response activities is critical to the health, safety, and welfare of the community (of Policy 5.1).

- **Electric Charging Spaces**

  The Township should encourage the addition of electric vehicle charging spaces, recognizing the rapidly expanding need for renewable energy sources and the advancement of autonomous and electric vehicle technologies (Policies 2.5 and 3.2).

  Electric charging should be planned for and integrated into the passenger vehicle parking lots to help plan for the future of electric vehicles as most vehicle manufacturers
are eliminating internal combustion vehicle production within the next 20 years (of Policy 2.5).

**Accommodate Changing Housing Demands**

- **Affordable Housing**

  Forks Township is one of the fastest-growing municipalities in the region, and the Township’s Comprehensive Plan identifies the importance of providing a variety of housing choices and prices to accommodate changing housing demands. The location of these housing units in close proximity to employment areas serves to maximize social and economic opportunities for everyone, though this requires a ‘local balance between housing and jobs’ that enables residents to live near where they work (of Policy 4.5). The LVPC encourages the Township to work with the developer to ensure apartment rent prices are accessible for a wide range of individuals and households, taking into consideration the wages of workers employed at nearby businesses. To ensure housing is made available to residents at a variety of income levels, FutureLV advocates for communities to ’promote mixed-income neighborhoods’ and ’diversify price points of available housing’ (of Policy 4.5).

**Land Use**

- **Character-Defining Area**

  Small sections running through several of these parcels, and all of parcel J8 20 3, are part of a Character Defining area. These areas represent the natural and scenic character of the Lehigh Valley as a simplified version of the Natural Resources Plan, with highest elevation areas representing scenic resources. The types of uses recommended are parks and open space, woodlands, agriculture, and low-intensity, limited-scale development that preserves natural and scenic resources. The LVPC recommends that, if possible, some of the sections of these parcels be preserved to create green space within the development which would ‘preserve natural resources in the land development process’ (of Policy 3.1) and ‘minimize environmental impacts of development’ (Policy 3.2).

- **Farmland Preservation Areas**

  These parcels are located within a Farmland Preservation Area. Farmland Preservation Areas are areas that are predominantly agriculture and are recommended to remain agriculture. The types of uses recommended include agriculture and related housing and businesses, parks and open space, and housing not related to agriculture on an extremely limited scale.

- **Natural Resource Conservation Priority Area**

  One of the three parcels, number J8 20 3, is located within a high-level Natural Resource Conservation Priority Area and has a high concentration of woodlands in the southern section. The High Conservation Priority Natural Resource areas shown on the
plan take precedence over other land use recommendations presented in *FutureLV*, including the General Land Use Plan. This represents a conservation first perspective. The High and Medium Conservation Priority areas should also be used by conservation organizations and government agencies to prioritize conservation efforts.

**Environmental Constraints**

- **Floodplains**

  The same parcel, J8 20 3 is proposed to be used as an underground detention/capture and reuse basin. This parcel is in the floodplains and is within the Federal Emergency Management Agency (FEMA) Flood Hazard Area 100-year flood zone as shown below.

No housing development is proposed for this parcel and the LVPC recommends that the woodlands be maintained to support this Natural Resource Conservation Priority Area and as a mitigation measure for flooding, which would ‘incorporate resiliency into the planning and design in 100- and 500-year floodplains (of Policy 5.1) and ‘preserve natural resources in the land development process’ (of Policy 3.1).
• Karsts

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

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

Coordinate Land Use Decisions
Stockertown Borough and Tatamy Borough are being included in this review letter to ‘coordinate land use decisions across municipal boundaries’ as part of Policy 1.4.

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with FutureLV: The Regional Plan, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

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

Sincerely,

Bambi Griffin Rivera
Senior Community and Regional Planner

Brian Hite
Transportation Planner

Jillian Seitz
Senior Community Planner

Dean S. Severson, AICP
Director of Regional Planning

cc: Larken Associates, Applicant;
Ana Martins, P.E. c/o Van Cleef Engineering Associates, Project Engineer/Surveyor;
Gilmore & Associates, Township/Borough 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;
Dean Severson, AICP, LVPC Director of Regional Planning;
Mark A. Saginario, Tatamy Borough Manager;
Sean Dooley, Chair, Stockertown Borough Planning Commission
<table>
<thead>
<tr>
<th>Project</th>
<th>Municipality</th>
<th>Brief Statement of Purpose</th>
<th>LVPC Comment</th>
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</thead>
<tbody>
<tr>
<td>Subdivision and Land Development Ordinance</td>
<td>Pen Argyl Borough</td>
<td><strong>Recreation Fees</strong> - Proposes to add provisions for recreation fees that require public dedication of land for recreation and open space, or the payment of fees in lieu of land dedication.</td>
<td>Fulfills a recommendation of <em>FutureLV: The Regional Plan</em> to ‘diversify outdoor recreation opportunities’ (of Policy 4.4), improves access to green spaces and creates community spaces that promote physical and mental health (of Policy 5.3). Establishing a process requiring developers to provide open space at the time of land development supports an efficient development process responsive to regional needs (Policy 1.4), and enabling fees in lieu of recreation land dedication supports the fiscal health and sustainability of municipalities (of Policy 4.6).</td>
</tr>
<tr>
<td>Zoning Ordinance Amendment</td>
<td>Williams Township</td>
<td><strong>Off-Site Solar and Wind Energy Facilities</strong> – proposes to remove off-site solar energy systems and wind energy facilities as special exception uses in the agricultural district.</td>
<td>While removing these uses can support priorities for retaining farmland and open space (of Policy 3.3), the LVPC encourages the Township to further consider opportunities or appropriate areas to allow them on a case-by-case basis. Off-site alternative energy systems play an important role in diversifying energy sources and increasing sustainability to mitigate climate change (of Policy 3.4).</td>
</tr>
</tbody>
</table>
Plan Activity

Lehigh County
- Reviews: 30
- Acres: 80.4

Northampton County
- Reviews: 37
- Acres: 184

Types of New Development

Residential: 407 Total Units
- Single-Family Detached: 109
- Townhouses: 0
- Apartments: 296
- Planned Residential: 0
- Twins: 2
- Assisted-Living: 0
- Manufactured Homes: 0
- Condos: 0

Non-Residential: 551,542 Total Square Feet
- Commercial: 116,302
- Retail: 5,585
- Public/Quasi-Public: 186,081
- Industrial (Warehouse)*: 215,761 (W: 192,000)
- Office: 0
- Transportation: 27,813
- Agriculture: 0
- Recreational: 0

Regional Totals*
- Subdivision/Lot Line Adjustments: 17
- Development: 24
- Stormwater Management: 19
- Municipal Ordinances and Maps: 7
- Total Acres: 264.4

* Includes preliminary and final plans

Location of Development

Year to Date (Year to Year)

- Residential Units
- Non-Residential Square Footage

Previous Reports at lvpc.org/subdivision---development.html
DATE: May 16, 2023  
TO: LVPC Commissioners  
FROM: Matt Assad  
CC: Brian Hite  
REGARDING: Grants Summary Attachment for May 25 Meeting

LVPC Commissioners,

In lieu of a presentation during the May 25 meeting, we have compiled resources for Grants Opportunities below:

**The Pennsylvania Department of Health’s WalkWorks:** This initiative supports the development and adoption of active transportation plans or related policies. WalkWorks is currently accepting applications of up to $35,000 to help municipalities and MPOs develop active transportation plans. Applications are due by May 26, so time is nearly up. Bethlehem Township was one of the most recent recipients of a PA WalkWorks grant, and the LVPC received this grant to support the development of Walk/RollLV in 2019. More information is available at [https://www.health.pa.gov/topics/programs/WalkWorks/Pages/WalkWorks.aspx](https://www.health.pa.gov/topics/programs/WalkWorks/Pages/WalkWorks.aspx)

**PennDOT’s Transportation Alternative Set-Aside (TASA):** The TASA Program is specifically focused on non-motorized transportation options such as walking, rolling, and biking, as well as education programs for children. Guidance and procedures were released on Wednesday, May 10. There was an informational webinar for potential project sponsors on Wednesday, May 24 that’s available on the webpage, and the application cycle will open on May 29. More information is available at [https://www.penndot.pa.gov/ProjectAndPrograms/Planning/Pages/Transportation%20Alternatives%20Set-Aside%20-%20Surface%20Trans.%20Block%20Grant%20Program.aspx](https://www.penndot.pa.gov/ProjectAndPrograms/Planning/Pages/Transportation%20Alternatives%20Set-Aside%20-%20Surface%20Trans.%20Block%20Grant%20Program.aspx)

**Pennsylvania Department of Community and Economic Development (DCED) Multimodal Transportation Fund:** This is available for projects that are specifically for multimodal development, rehabilitation, and enhancement of transportation assets to existing streetscape, lighting, sidewalk enhancement, pedestrian safety, connectivity of transportation options for all modes of travel, including biking and walking. This funding is available to organizations and municipalities across Pennsylvania, and applications are open until July 31st. More information is available on the DCED website shown on the screen or by searching PA DCED Multimodal Transportation Fund. [https://dced.pa.gov/programs/multimodal-transportation-fund/](https://dced.pa.gov/programs/multimodal-transportation-fund/)
Transportation Alternatives Set-Aside

The 2023 Application Round Will Open May 30, 2023

Webinar for Potential Project Sponsors – May 24, 2023  10:00 AM

Potential project sponsors or their designated consultants are strongly encouraged to attend. Webinar will be recorded and linked in the Resources section, along with updated Q&A Responses. Details to join the meeting are below.

**Visual Component:**
Requires Microsoft Teams

*Join on your computer or mobile app*  
[Click here to join the meeting](#) Opens In A New Window

**Application Cycle Opens:**  May 30, 2023

**Draft Applications Due:**  July 17, 2023  4:00 PM  (A Draft Application submission is required)

**Final Applications Due:**  September 15, 2023  4:00 PM  (Final Applications may only be submitted after Draft Application meetings are held with the Districts and Planning Partner)

**Award Announcement:**  Late Winter/Early Spring 2024

The Transportation Alternatives Set-Aside (TASA) provides funding for projects and activities defined as transportation alternatives, including on- and off-road pedestrian and bicycle facilities, infrastructure projects for improving non-driver access to public transportation and enhanced mobility, community improvement activities, and environmental mitigation, trails that serve a transportation purpose, and safe routes to school projects.
Talking Business with Becky Bradley: The Lehigh Valley is More Powerful if We Work Together

By Becky Bradley | Special to The Morning Call

PUBLISHED: May 4, 2023 at 7:00 a.m.

Anyone who’s lived in this region for longer than a couple decades probably remembers when we called ourselves the Allentown-Bethlehem-Easton area. ABE graced the names of hundreds of businesses and promotions, as well nonprofits and public organizations across Lehigh and Northampton counties.

ABE served us well for a long, long time, but lots of really smart community leaders have spent the past 40 years trying to forget old ABE existed — and not just because it involved three words and two hyphens, and didn’t exactly roll off the tongue.

They did it because they knew we are far more formidable as arguably Pennsylvania’s fastest-growing region than we are as its 10th- and 13th-largest counties, or a cluster of three cities. We are now one Lehigh Valley, and all that hard work of becoming known for our unified vision has never been more important than it is right now, as cities, states, counties and yes regions, begin to compete for more than $2 trillion — yes, with a T — in funding being doled out through the Bipartisan Infrastructure Law and Inflation Reduction Act. Money from those funds — much of it coming in the form of competitive grants through dozens of state and federal programs — will do everything from repairing roads and bridges to building the backbone to fuel millions of electric cars that will soon be on the road, to upgrading our sewer and water systems to providing critical internet connectivity to underserved communities, to improving air and water quality to mitigating climate change to addressing dozens of other critical issues, each as important as the last.

The fact is this region didn’t need the lure of a 12-digit federal fund as an incentive to come together. Certainly, the creators of the Lehigh Valley Planning Commission deserve a lot of credit for literally founding this movement fully two decades ahead of just about everyone else, when they not only became one of the first in the nation to create a regional planning organization but followed that in 1964 with Pennsylvania’s first-ever regional comprehensive plan.
It’s taken years of consolidating, name-changing and not-so-gentle persuasion, but many have worked hard to unify this region. In 1984, county-based visitors bureaus were merged into what is now known as Discover Lehigh Valley. A year later, a group of influential business leaders formed The Lehigh Valley Partnership specifically to begin crafting a unified voice, and that led to the formation of the Lehigh Valley Economic Development Corp. in 1995, merging county business recruitment and marketing efforts. Perhaps the heaviest of lifts was consolidating more than a dozen local chambers of commerce into the Greater Lehigh Valley Chamber of Commerce. Go to any of its major events and you're likely to be sitting alongside many of the region’s state and federal legislators. That's because it’s now an influential 3,200-member powerhouse that is the sixth-largest Chamber of Commerce in the nation.

It might sound like just some trivial name change, but this affects everything from how many cash-carrying tourists visit the area to how much money flows into the region from Harrisburg and Washington, D.C., to how the rest of the world views the Valley. As we’ve grown into our newly found place in this global economy, the Lehigh Valley has done well punching above its weight to compete with bigger cities and regions. That’s what we had to do when we won a highly competitive $21.2 million federal grant to build the Riverside Drive commuter road and trail project, but it took us seven years and uncommon tenacity to win it last year over the likes of Philadelphia, Seattle and Miami. But things are changing quickly and we’ll need to up our game and strengthen our collaborations.

We are living in a time of great social, economic, governmental, technological and environmental change. These events will transform everything and we cannot maintain our region’s place or enhance it without working together. This is not Lehigh County’s, Northampton County’s, the City of Allentown’s, Lowhill Township’s, the Saucon Valley’s, Parkland School District’s, Nazareth Area School District’s, Portland Borough Water Authority’s, the Bethlehem Water Authority’s, the Lehigh County Redevelopment Authority’s, Easton Redevelopment Authority’s or any individual political subdivision’s set of needs or opportunities. It is the Lehigh Valley’s.

For the last 62 years, the Lehigh Valley Planning Commission, as the region’s bicounty planning agency, has convened and collaborated with every public entity locally, and at the state and federal levels. We have done the same with our nonprofit and private sector partners.

Reliably, accurately, judiciously and bravely we have always worked together for the greater good.

Bethlehem Steel was one of the largest corporate failures in American history at the time and what did we do? We stood together and looked forward. Fifteen years ago, we had the largest housing downturn in American history and we looked forward. During one of the greatest economic booms in the Lehigh Valley’s history, we now stand together, we don’t rest and we look forward. A squishy global economy — we look
forward. A growing climate crisis — we stand together. A technology revolution — we look forward. Medical advancements unlike anything we have seen in human history — we stand together and look beyond what we know today. No matter the change. We stand together and work towards the future that we need.

Together we have always guaranteed that the entire region garners the benefits of a consistent, coordinated and managed transportation system, a balanced approach to land use, development, the environment, parks and recreation, jobs and the economy … all key indicators of the Lehigh Valley’s health and our quality of life. As the region continues to grow, these definitions will change. Our future will change. And now more than ever we must act as a region. Prioritize what we need most and leave behind what no longer serves us.

We are successful because we are one Lehigh Valley — a planned Lehigh Valley — greater than our individual parts. As we continue to navigate a time of great change, let us continue to embrace the power of many.

*Becky Bradley is Executive Director of the Lehigh Valley Planning Commission.*
Local Government Appreciation Day

June 28, 2023
11 AM – 1 PM
Wayne A. Grube Memorial Park