COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, July 25th, 2023, 12:00 noon
AGENDA


Roll Call

Staff Introductions

Courtesy of the Floor

Ordinance/Plan Reviews and Information for July 2023:

1. ACTION ITEM: Freemansburg Borough and Bethlehem Township - Land Use of Regional Significance - Freemansburg Industrial (BB/BH)
2. ACTION ITEM: Allen Township - Land Use of Regional Significance - 770 Savage Road (SN, MG)
3. ACTION ITEM: Bethlehem Township - Land Use of Regional Significance - St. Luke's Hospital Anderson Wing 3 (SN, JD, MG)
4. ACTION ITEM: Lower Saucon Township - Zoning Ordinance and Map Amendment - Rural Agricultural to Light Industrial (275.7 Acres) (JS)
5. ACTION ITEM: Forks Township - Zoning Ordinance and Map Amendment - Industrial Designation District (JS)
6. ACTION ITEM: Upper Macungie Township - Zoning Ordinance Amendment - Miscellaneous (JS)
7. ACTION ITEM: South Whitehall Township - Zoning Ordinance Amendment - Height Exceptions in Zoning Ordinance (JD)
8. INFORMATION ITEM: River Central Multi Municipal Plan Update (JS)

Next Comprehensive Planning Committee Meeting:
August 22, 2023 at 12:00 pm
July 14, 2023

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

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

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

Dear Messrs. Itterly and Bruce:

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

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

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

The LVPC offers the following comments:

Transportation

Trip Generation

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

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

SUPPLEMENTAL TRAFFIC GENERATION ANALYSIS

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

SITE ACCESS

Commercial truck access to and from the project location and the impacts to the surrounding communities are a concern because of the need for connectivity to Interstate 78 (I-78) via State Route 33 to the east or through the south side of the City of Bethlehem via State Route 412. Ultimately, the majority of commercial trucks will be on major arterial roads for access to the Interstate system of highways for the movement of freight. Tractor-trailer access impacts to the surrounding communities are a significant concern. Truck routes should be planned to prevent drivers from using GPS directions that guide them to I-78 along roads not built to handle large trucks.
The TIS contains the following statement on page 14: “We understand that the Borough of Freemansburg has expressed concerns regarding truck traffic along Main Street and Washington Street. Based on discussions with the developer and based on a review of current geometry within the area, we do not anticipate that any trucks will access the site via Main Street to Washington Street, as this route is not able to accommodate truck turns, especially at the intersection of Washington Street (SR 3005) with Freemansburg Avenue.”

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

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

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

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

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

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

EMERGENCY ACCESS

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

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

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

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

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

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

ON SITE TRANSPORTATION MOVEMENTS

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

Additionally, there appears to be numerous fences across aisles and parking areas shown on the plan sets. The gate access should be clarified and be placed in locations to enable appropriate queuing areas that don’t impact vehicle movements throughout the project locations, especially if the intent is to separate passenger vehicles from commercial vehicles (of FutureLV Policy 1.2).

FREIGHT CENTRIC AMENITIES

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

Tractor-trailer and trailer parking/dock spaces should consider the inclusion of electrical infrastructure to limit tractor-trailer idling and improve air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling law. The installation of this type of infrastructure would also mitigate sound impacts to the adjacent properties by providing cleaner and quieter sources of energy for in-cab truck amenities, as well as refrigeration units of trucks and trailers. (of FutureLV: Policy 3.2 and 1.3).

Additionally, truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary vehicle charging infrastructure that may be required. Trailers with refrigeration units are emerging with hybrid-run operations that enable an electric hookup to not rely on diesel fuel. Incorporating these
features on-site can ‘reduce climate change impacts’ (of FutureLV: Policy 2.5 & 3.4) by offsetting the air quality impacts generated by freight uses and tractor-trailer idling.

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

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

MULTIMODAL TRANSPORTATION CONSIDERATIONS

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

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

It is recommended that sidewalks be constructed along the frontage of the industrial warehouse development in order to provide opportunities for employees who may wish to walk during break times during their workday. Sidewalks in a safe and accessible location would essentially serve as a recreational trail for employees and truck drivers and would promote health and wellness onsite. Alternative modes of transportation amenities should be provided onsite, including bicycle racks in safe and well-lighted location in relative proximity to employee entrances.
The emergency access driveway along Freemansburg Avenue would be an excellent location for sidewalk construction, with a loop internal and external to the project location. This would also enable a pedestrian evacuation route to exist along with the vehicular emergency access to complement each other for emergency response purposes (of FutureLV policy 2.3, 5.2 & 5.3).

TRANSIT AND WORKFORCE

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

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

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

EXISTING SITE CONDITIONS, PLANNING AND ZONING

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

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

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

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

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

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

SUSTAINABLE BUILDING AND LANDSCAPING AND DESIGN

Green infrastructure and solar panels can be well-utilized on expansive roof surfaces when the roofs are constructed to accommodate their weight. Additionally, the developer should consider opportunities to incorporate sustainable energy systems into building functionality, which reduce overhead operational costs and ‘minimize environmental impacts of development’ (Policy 3.1).

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

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

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

Sincerely,

Dean S. Severson, AICP
Director of Regional Planning

Brian Hite
Transportation Planner

cc: 1600 Freemansburg Associates, Applicant
Langan Engineering, Project Engineer/Surveyor
Justin Coyle, Borough Engineer
Ron Gawlik, Township Engineer
Denjam Khadka, LVPC Senior Civil/Environmental Engineer
Steve Neratko, LVPC Chief Community and Regional Planner
Geoffrey A. Reese, PE, LVPC Master Planner and Engineer
July 15, 2023

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

Re:  Savage Road Development Plans  
Allen Township  
Northampton County

Dear Mr. Krill:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting
  - July 25, 2023, at 12:00 PM
  - [https://lvpc.org/meetings.html](https://lvpc.org/meetings.html)

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

The subject application is a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the ‘Warehouse, Logistics and Storage Facilities, Freight Facility, Local Freight Generator’ land use category.

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

The LVPC offers the following comments and recommendations:

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

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

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

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

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

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

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

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

**Transportation**

Weaversville Road is considered a congested corridor and traffic impacts should be limited in this area. Vehicle traffic impacts can be worsened by the lack of alternative transportation options. Ensuring that freight mobility is matched with appropriate infrastructure to accommodate it should occur prior to approving land development plans (of Policy 2.4). No Transportation Impact Study (TIS) was received, however the LVPC transportation team reviewed the proposal and made comments and recommendations on the submitted plan set.

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

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

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

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

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

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

**Commercial Vehicle Driver Amenities**

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

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

**Environmental Transportation Mitigation**

Tractor-trailer and trailer parking spaces should consider the inclusion of electrical hookup infrastructure to limit tractor-trailer idling and improve air quality by reducing emissions and ensuring compliance with the 2008 Pennsylvania Diesel Idling law (of FutureLV, Policy 3.2 and 1.3). Additionally, truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary charging infrastructure that may be required. Trailers with refrigeration units are emerging with hybrid-run operations that enable an electric hookup to not rely on diesel fuel. Incorporating these features on-site can 'reduce climate change impacts' by offsetting the air quality impacts generated by freight uses and tractor-trailer idling. (of FutureLV, Policy 3.4)

**Stormwater Review**

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

Sincerely,

Steve Neratko  
Chief Community and Regional Planner

Brian Hite  
Transportation Planner

Mackenzie Geisner  
Planning Intern

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

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

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

Dear Ms. Raudenbush:

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

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

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

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

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

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

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

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

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

**Landscaping**
The implementation of vegetation such as landscaping in the form of concrete planters is encouraged by the LVPC to ‘create community spaces that promote physical and mental health’ (Policy 5.3). The introduction of native landscape material and pervious pavement will ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (Policy 3.2).
**Stormwater Review**
The project site is located within the Fry’s Run watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments relative to our review of the project’s stormwater management plan are included as attachment 1.

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

Sincerely,

Steve Neratko
Chief Community Planner

Joseph Dotta
Community Fellow

Mackenzie Geisner
Planning Intern

cc:
St. Luke’s University Health Network, Applicant;
Scott Pasterski, P.E., PTOE, Project Engineer/Surveyor;
Ron Gawlik, Township Engineer;
Leslie Walker, Chair, Bethlehem Township Planning Commission
Denjam Khadka, LVPC Senior Civil/Environmental Engineer;
Geoffrey A. Reese, PE, LVPC Master Planner and Engineer;
July XX, 2023

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

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

Dear Mr. Hudson:

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

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

The subject application proposes amendments to the Township Zoning Ordinance pertaining to Landfills and Waste Disposal Facilities, and proposes to amend the Township Zoning Map by rezoning a series of parcels from Rural Agricultural Zoning District (RA) to Light Industrial Zoning District (LI).

Zoning Ordinance Amendments

Conditional Use and Site Plan Approval Exemption
The Township’s Zoning Ordinance designates Landfills and Waste Disposal Facilities as a special exception use in the LI District. The amendment proposes to change Landfills and Waste Disposal Facilities from a special exception to a use permitted by right in the LI District, and exempt landfill or waste disposal facilities from the site plan approval process if it will require land development approval under the Township Subdivision and Land Development Ordinance and a permit from the Pennsylvania Department of Environmental Protection.

These text amendments do not align with the intent of FutureLV: The Regional Plan to protect the health, safety and welfare of the public (Policy 3.2). Landfills and Waste Disposal Facilities are high intensity land uses that have significant social and environmental impacts, and impacts to residents and/or the environment resulting from expanding and increasing operation must be cautiously scrutinized and mitigated:
Environmental impacts of landfills include release of methane gas and carbon dioxide, two significant contributors to climate change. Currently the Solid Waste sector contributes to 4.8% of greenhouse gas emissions in the Lehigh Valley, but without action, emissions in the Solid Waste sector will increase 16.2% by the year 2050 (Lehigh Valley Greenhouse Gas Assessment).

As a highly land-consumptive use, landfill expansions often result in destruction of environmental resources and wildlife habitats. This poses a direct impact to the land, but also affects the economic value open space provides to Lower Saucon Township and the Lehigh Valley. Natural systems such as forests, wetlands and riparian corridors provide the greatest economic benefit through natural green infrastructure that reduces tax dollars by avoiding over $110.3 million in expenditures for water supply, flood mitigation and water quality. The air quality benefits provided by trees adds another $48.2 million value annually (Lehigh Valley Return on Environment).

Social impacts of landfills include possible health risks for residents if landfill gases migrate either above or below ground. Landfills are also found to decrease land values. A study by the Penn State University Northeast Regional Center for Rural Development found that high-volume landfills can depress adjacent property values by 12.9%.

Landfills help keep communities clean by providing a designated place for waste disposal and preventing litter. However, the need for waste disposal must be balanced with managing the impacts generated by the land use. These adverse impacts can be mitigated with careful review and evaluation of individual proposals with reasonable safeguards to ‘reduce greenhouse gas emissions’ to reduce climate change impacts (of FutureLV Policy 3.4), ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’, ‘protect the quality and quantity of surface water and groundwater’ and ‘improve regional air quality’ (of FutureLV Policy 3.2) and promote safe, healthy, inclusive and livable communities (FutureLV Goal 5).

The Pennsylvania Department of Community and Economic Development Governor’s Center for Local Government Services states that “Special exceptions and conditional uses are usually reserved for those land uses that will have a significant impact on the zoning district or the whole community, or for those uses that necessitate additional safeguards. Common examples of such uses include, but are not limited to, landfills” (Special Exceptions, Conditional Uses and Variances Planning Series #7 Ninth Edition). Conditional and special exception uses are regulatory safeguards that provide municipalities the opportunity to ensure projects pose minimal adverse impacts on the public health, safety and welfare. The text amendments propose eliminating these safeguards and review processes, which is not a best practice for managing development (of Policy 1.4).

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

The addition of a Natural Resources Mitigation Alternative does not align with the intent of
FutureLV to protect high-priority natural lands (of Policy 3.1). Preserving natural resources in
a given area does not necessarily work as a one-for-one trade for environmentally sensitive
features existing in the area proposed for development, and risks fragmentation of natural
landscapes and greenways.

Zoning Map Amendment

The subject application proposes to rezone seven parcels totaling approximately 275.7
acres from Rural Agricultural Zoning District (RA) to Light Industrial Zoning District (LI). The
parcels are located between Riverside Drive to the north, Bull Run Creek to the northeast
and Applebutter Road to the south, adjacent to the existing Light Industrial Zoning District
and Bethlehem Landfill. One property proposed to be rezoned is located on the western
boundary of the Light Industrial Zoning District on Skyline Drive. Parcels to be rezoned are
shown on Exhibit A:
The proposal to rezone the northernmost parcels as LI District (parcels 1-5 in Exhibit A) does not align with the Future Land Use Plan of *FutureLV: The Regional Plan*. These parcels are located in a Character-Defining Area representing the natural and scenic character of the Lehigh Valley and contain High Preservation Priority features shown on the *FutureLV* Natural Resources Plan such as woodlands, steep slopes and Natural Heritage Inventory Core Habitats. The types of uses recommended in High Preservation Priority areas are parks and open space, woodlands, agriculture, and low-intensity, limited scale development that preserves natural and scenic resources. The LVPC strongly recommends that the Township prioritize retention of natural features as an essential characterizing attribute in the area near the Lehigh River.

**Township Comprehensive Plan and Zoning Ordinance Objectives**

Overall, the proposed zoning ordinance amendments and zoning map amendments do not align with the goals outlined in the Township’s recently updated comprehensive plan, *Our Resources, Our Valley Multi-Municipal Comprehensive Planning in Pennsylvania’s Saucon Valley*. The Plan identifies the Township’s natural resources, along with its other cultural and historic assets, as significant components of the region’s future economic development (page 1-6). The Plan’s goals to ‘Balance Initiatives: Balance development and conservation initiatives in order to maintain the ambiance and quality of Saucon Valley’s distinct cultural landscapes: small town, suburban and rural’ and ‘Enhance the Continuity of Resources: Enhance the continuity, visibility and inter-connectivity of the Valley’s cultural, natural and historical resources’ (page 1-12).

The area proposed to be rezoned does not align with the Township’s *Future Land Use and Housing Plan map*. Specifically, parcel 5 to be rezoned LI District is identified as "Open Space" in the Plan, with the purpose of larger-scale natural resource conservation and/or
recreation. The map of Regionally Significant Natural Resource Areas (Page 1-21) also show that the areas proposed to be rezoned conflict with Regionally Significant Sensitive Natural Resource Areas:

Additionally, the proposal to change Landfills and Waste Disposal Facilities to a permitted-by-right use and reduce review provisions does not align with the intent, purpose and scope of the Township’s Zoning Ordinance outlined in Section 180-3, including ‘C. Providing reasonable guidelines for development within and adjacent to environmentally sensitive areas’, ‘E. Preserving the value of real property’ and ‘F. Protecting the quality of environmentally sensitive areas, both within and adjacent to developments’ and ‘H. Facilitating implementations of the policies, proposals and objectives of the Comprehensive Plan for Lower Saucon Township’.
Municipalities, when considering zoning ordinance and map amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send any final amendments that are adopted.

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

Sincerely,

Jillian Seitz
Senior Community Planner

CC: Cathy Hartranft, Hellertown Borough Manager
July XX, 2023

Donna Asure, Township Manager
Forks Township
1606 Sullivan Trail
Easton, PA 18040

RE: Zoning Ordinance and Map Amendment – Industrial Designation District
Forks Township
Northampton County

Dear Ms. Asure:

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

The subject application proposes to amend the Township Zoning Ordinance by establishing an Industrial Designation District (ID), and includes an amendment to the Township Zoning Map which rezones a series of parcels from Employment Center District (ED) to the newly created ID District (parcel numbers J9 15 4B 0311E; J9 15 3A 0311; J9 15 1 0311; J9 15 2 0311; J9 21 1A 0311; J9 21 1 0311; J9 15 3 0311; J9 21 2 0311; J9 15 6 0311; J9 15 6-1 0311; J9 21 3 0311; J9 15 8 0311; J9 15 8D 0311; J9 15 8D-5 0311; J9 15 8D 0311; J9 15 8D-4 0311; J9 15 8D-3 0311; J9 15 8D-2 0311; J9 15 8A-1 0311; J9 15 8C 0311; J9 15 7B 0311; J9 15 11A 0311; J9 15 11 0311; J9 15 8D-1 0311; J9 16 4 0311; J9 16 2 0311; J9 16 5 0311; J9 16 6 0311; J9 16 3 0311; J9 16 1A 0311; J9 16 1D 0311; J9 16 1 0311; J9 16 1C 0311; J9 16 1B 0311; J9 15 7A-2 0311; J9 15 7A 0311; J9 15 7C1 0311; J9 15 7C 0311; J9 15 7D-1 0311; J9 15 7D 0311; J9 15 7 0311; J9 15 5 0311; J9 15 4A 0311; J9 15 6-7 0311; J9 15 6-8 0311; J9 15 6-9 0311; J9 15 6-10 0311; J9 15 6-11 0311; J9 15 6-14 0311; J9 15 6-15 0311; J9 15 6-16 0311E; J9 15 6-2 0311; J9 4 1 0311; J9 15 6-12 0311; J9 15 6-3 0311; J9 15 9A 0311E; J9 15 9 0311; J9 21 3A 0311; J9 15 8A 0311 and J9 14 2 0311).

Zoning Ordinance Amendment
The stated intent of the ID District is to create an area with adequate access to major routes for industrial transportation and to promote and encourage industrial businesses...
in the Township while ensuring that the character of the surrounding districts is maintained and protected against industrial impacts. The proposed ID District supports guiding the location and intensity of development and encourages reinvestment in commercial areas (of FutureLV Policies 1.1 and 4.6).

The proposed ordinance permits a number of industrial uses in the ID District including food processing, distribution, truck terminal, wholesale and warehouse uses, all by conditional approval, and removes these uses from the Employment Center (EC) zoning district. The LVPC commends the proposal for permitting high-impact industrial uses conditionally rather than by right, which is a best practice managing development processes that enables consideration of proposals on a case-by-case basis to determine context-specific reasonable conditions to meet the goals of the Township’s Comprehensive Plan and promote the public health, safety and welfare (of FutureLV Policy 1.4).

Zoning Map Amendment

The 60-parcel area to be rezoned as ID District is largely developed and consists of existing industrial uses. Additionally, the proposal aligns with the industrial area

The location of the proposed industrial zoning district abuts a wide range of existing land uses, including agriculture, residential, senior living services and commercial among other uses. Considering the continual growth and evolution of logistics and warehousing industries, a proactive regulatory approach is crucial to minimize freight impacts on resident quality of life (FutureLV Policy 2.4). The LVPC strongly recommends the Township continue to evaluate opportunities for additional regulatory strategies to include in Section 200-28 Additional Regulations for specific uses. Examples of current best practices are outlined in the Northampton County Freight-Based Land Use Management Guide. The Guide and related freight management tools are available at https://www.northamptoncounty.org/CMTYECDV/Pages/Freight-Based-Land-Use-Management-Guide.aspx. Continually evaluating Township ordinances and implementing current best practices aligns with the Township’s Comprehensive Plan objective to “Ensure that regulatory design standards for commercial, industrial, and institutional development are current with accepted best practices” (Forks Township Comprehensive Plan Goal 1, Page 29).

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with FutureLV: The Regional Plan, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC. If you have any questions, please do not hesitate to call.

Sincerely,

Jillian Seitz
Senior Community Planner

CC: Lisa Pereira, Township Solicitor
July XX, 2023

Kalman A. Sostarecz, Jr.
Assistant Manager and Director of Community Development
Upper Macungie Township
8330 Schantz Road
Breinigsville, PA 18031

RE: Zoning Ordinance Amendment – Miscellaneous
Upper Macungie Township
Lehigh County

Dear Mr. Sostarecz:

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

The subject zoning ordinance amendment proposes to amend Sections 27-307 pertaining to lot and setback requirements and 27-603 pertaining to off-street parking design standards by replacing the term “cluster development” with “Conservation Design Development”, providing minimum lot requirements for Distillery, Microbrewery and Winery uses, and specifying cartway widths for residential parking lots and Conservation Design Developments.

While these are minor proposals and a matter of local concern, the LVPC commends the Township for clarifying zoning ordinance language and terms which is a best practice for local governments (of Policy 1.4) and demonstrates ‘the evolution and adaptability of government’ (of Policy 1.1).

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with FutureLV: The Regional Plan, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC. If you have any questions, please do not hesitate to call.

Sincerely,

Jillian Seitz
Senior Community Planner
July 12, 2023

Gregg Adams, Planner, Community Development Department
4444 Walbert Avenue
Allentown, PA 18103

RE: Zoning Ordinance Amendment – Height Exceptions in Zoning Ordinance
South Whitehall Township
Lehigh County

Dear Mr. Adams:

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

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

The subject zoning ordinance amendment proposes to amend Section 350-42(h) Height Exceptions as follows:

- Defines exceptions to maximum permitted building heights for structures such as steeples and antennas, as appurtenances.
- Permits the Zoning Officer to approve exceptions to the maximum height of buildings and structures.
- Clarifies the measurement of the width and height of appurtenances as measured at grade.
- Requires all portions of the appurtenance that exceed the maximum permitted height to be set back a distance equal to the height of the appurtenance.
- Requires compliance of building and structure heights with Federal Aviation Regulation Part 77.

The proposed amendment demonstrates ‘the evolution and adaptability of government’ (of Policy 1.1) by clarifying zoning ordinance language regulating the built environment.

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with FutureLV: The Regional Plan, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC. If you have any questions, please do not
hesitate to call.

Sincerely,

[Signature]

Dean Severson
Director of Regional Planning

Cc: Tom Petrucci, Township Manager
    David Manhardt, Township Director of Community Development