



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

ENVIRONMENT COMMITTEE MEETING
Tuesday, August 26, 2025, 10:30 AM
AGENDA

THE MEETING CAN BE ACCESSED AT <http://www.tinyurl.com/LVPC2025> OR VIA PHONE
610-477-5793 Conf ID: 651 626 091#.

Roll Call

Courtesy of the Floor

1. Staff Introduction
 - a. Clay Karnis, GIS Planner

Committee Business:

1. *ACTION ITEM*: Act 537 Sewage Facilities Planning Module – 2951 Betz Court – Lowhill Township (CR)
2. *INFORMATION & DISCUSSION ITEM*: Trail Gap Analysis Project Introduction (CM)
3. *INFORMATION & DISCUSSION ITEM*: Regional Climate Action Plan Implementation Strategies Overview (SM)

Next Environment Committee Meeting
September 23, 2025, 10:30 AM



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August XX, 2025

Mr. Joshua Hoffman, PE
Pennoni Associates Inc.
5072 Ritter Road, Suite 102
Mechanicsburg, PA 17055

**Re: Act 537 Review - Sewage Facilities Planning Module
2951 Betz Court
Lowhill Township, Lehigh County
DEP Code No. 2-39914076-2**

Dear Mr. Hoffman:

The Lehigh Valley Planning Commission (LVPC), at its regularly monthly meeting on August 28, 2025, reviewed the above-referenced planning module according to the requirements of Act 537, the Pennsylvania Sewage Facilities Act. We offer the following comments.

The LVPC has reviewed a previous version of the planning module for this project on May 28, 2024. This sewage facilities planning module has been revised as a result of the completion of additional on-site investigation and testing to establish a tested replacement absorption area for the proposed development and is intended for the proposed construction of a 299,880 square foot warehouse on approximately 52.5 acres located at 2951 Betz Court. The development is proposed to be served by on-lot sewage disposal and community water supply via a lengthy extension of the existing Lehigh County Authority water system. The development is considered marginal for on-lot sewage disposal by the Pennsylvania Department of Environmental Protection since the system will serve an industrial use and due to soils profile examinations, which documented areas of suitable soil intermixed with areas of unsuitable soils.

The proposed development is in an area designated as High Priority Farmland Preservation, with a portion of the site designated as High Priority Natural Resource Conservation, according to *FutureLV: The Regional Plan*. The proposed extension of the community water system is not recommended in areas designated for farmland preservation. However, while farmland preservation and natural resource conservation are strongly preferred, the use of on-lot sewage facilities is appropriate for this rural area. Further, the provision of a tested replacement absorption area will ensure a future safeguard in the event of a non-repairable primary area malfunction, aligning with the *FutureLV* action to "protect the quality and quantity of surface water and groundwater" (of Policy 3.2).

Enclosed please find an executed Module Component 4b. Please call me if you have any questions regarding this review.

Sincerely,

Corinne Ruggiero
Environmental Planner

Enclosure

cc: Michael Siegel, Manager, Lowhill Township
Jill Seymour, Municipal Secretary, Lowhill Township
Jeffrey Mondulick, PA Department of Environmental Protection
Fred Ferraro (Applicant)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

DEP Code #:
2-39914076-2

**SEWAGE FACILITIES PLANNING MODULE
COMPONENT 4B - COUNTY PLANNING AGENCY REVIEW**

(or Planning Agency with Areawide Jurisdiction)

Note to Project Sponsor: To expedite the review of your proposal, one copy of your completed planning package and one copy of this *Planning Agency Review Component* should be sent to the county planning agency or planning agency with areawide jurisdiction for their comments.

SECTION A. PROJECT NAME (See Section A of instructions)

Project Name

2951 Betz Court

SECTION B. REVIEW SCHEDULE (See Section B of instructions)

1. Date plan received by county planning agency ---
2. Date plan received by planning agency with areawide jurisdiction August 12, 2025
Agency name Lehigh Valley Planning Commission
3. Date review completed by agency August XX, 2025

SECTION C. AGENCY REVIEW (See Section C of instructions)

- | Yes | No | |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1. Is there a county or areawide comprehensive plan adopted under the Municipalities Planning Code (53 P.S. 10101 <i>et seq.</i>)? |
| <input type="checkbox"/> | <input type="checkbox"/> | 2. Is this proposal consistent with the comprehensive plan for land use? <u>Area designated for High Priority Farmland Preservation /</u> |
| <input type="checkbox"/> | <input type="checkbox"/> | 3. Does this proposal meet the goals and objectives of the plan? <u>Natural Resource Conservation Area in Future LV.</u>
If no, describe goals and objectives that are not met --- <u>Strongly preferred.</u> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 4. Is this proposal consistent with the use, development, and protection of water resources? <u>Meets sewage disposal needs.</u>
If no, describe inconsistency --- <u>Extension of community water system is not recommended.</u> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 5. Is this proposal consistent with the county or areawide comprehensive land use planning relative to Prime Agricultural Land Preservation? <u>Area designated for High Priority Farmland Preservation in Future LV.</u>
If no, describe inconsistencies: --- |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 6. Does this project propose encroachments, obstructions, or dams that will affect wetlands?
If yes, describe impact --- |
| <input type="checkbox"/> | <input type="checkbox"/> | 7. Will any known historical or archeological resources be impacted by this project? <u>PHMC determination</u>
If yes, describe impacts --- |
| <input type="checkbox"/> | <input type="checkbox"/> | 8. Will any known endangered or threatened species of plant or animal be impacted by the development project? <u>See PNDI results.</u>
If yes, describe impacts --- |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 9. Is there a county or areawide zoning ordinance? |
| <input type="checkbox"/> | <input type="checkbox"/> | 10. Does this proposal meet the zoning requirements of the ordinance? <u>N/A</u>
If no, describe inconsistencies --- |

SECTION C. AGENCY REVIEW (continued)

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	11. Have all applicable zoning approvals been obtained? <i>N/A</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Is there a county or areawide subdivision and land development ordinance? <i>Not applicable to Lowhill Township</i>
<input type="checkbox"/>	<input type="checkbox"/>	13. Does this proposal meet the requirements of the ordinance? <i>N/A</i> If no, describe which requirements are not met ---
<input type="checkbox"/>	<input type="checkbox"/>	14. Is this proposal consistent with the municipal Official Sewage Facilities Plan? <i>See municipal interpretation.</i> If no, describe inconsistency ---
<input type="checkbox"/>	<input checked="" type="checkbox"/>	15. Are there any wastewater disposal needs in the area adjacent to this proposal that should be considered by the municipality? If yes, describe ---
<input type="checkbox"/>	<input type="checkbox"/>	16. Has a waiver of the sewage facilities planning requirements been requested for the residual tract of this subdivision? <i>N/A</i>
<input type="checkbox"/>	<input type="checkbox"/>	If yes, is the proposed waiver consistent with applicable ordinances. If no, describe the inconsistencies ---
<input checked="" type="checkbox"/>	<input type="checkbox"/>	17. Does the county have a stormwater management plan as required by the Stormwater Management Act?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	If yes, will this project plan require the implementation of storm water management measures?
18. Name, Title and signature of person completing this section:		
Name: <u>Corinne Ruggiero</u>		
Title: <u>Environmental Planner</u>		
Signature: _____		
Date: <u>August XX, 2025</u>		
Name of County or Areawide Planning Agency: <u>Lehigh Valley Planning Commission</u>		
Address: <u>615 Waterfront Drive, Suite 201, Allentown, PA 18102</u>		
Telephone Number: <u>610-264-4544</u>		

SECTION D. ADDITIONAL COMMENTS (See Section D of instructions)

This component does not limit county planning agencies from making additional comments concerning the relevancy of the proposed plan to other plans or ordinances. If additional comments are needed, attach additional sheets.

The county planning agency must complete this component within 60 days.

This component and any additional comments are to be returned to the applicant.

PROJECT OVERVIEW

SCOPE OF PROJECT

- Updated regional trail inventory
- Identification of top trail gaps
- Strategies to close trail gaps, including resources and tools

DELIVERABLES

- Trail Inventory and Gap Analysis Document
- Map-based trail location and implementation tracker

ENGAGEMENT

- Municipal survey to collect trail information
- Trail partner coordination workshop and gap priorities discussion

TIMING

- **August** – Municipal survey, research and analysis
- **September** – Trail partner coordination
– Gap priorities discussion
- **October** – Mapping tool and draft report development
- **November** – Publication

What is the project?

An inventory of all existing, planned and future trail infrastructure in the Lehigh Valley. This information will help identify trail infrastructure gaps, benchmark them against regional goals and prioritize their closure, and interactive mapping tools designed to coordinate the regional trail system and track gap closures will set the stage for organized implementation of gap closures.

When will the project be complete?

The Trail Inventory and Gap Analysis will be published by November 2025.

Where will the project focus?

The project area covers the Lehigh Valley, including all 62 municipalities. Ten top trail gaps will be determined through data analysis and outreach with municipalities and trail partners.

Why are we doing this project?

The previous Trail Inventory and Gap Analysis was completed in 2013, many changes have occurred since then. This project will organize up-to-date trail data into one report, which will inform regional stakeholders about the status of trail infrastructure and support creation of a larger regional system.

This effort will support other active transportation initiatives throughout the Valley for both commuter and recreational options. Municipalities and trail partners will be able to use information included in the analysis to support funding applications for trail improvements.

Who is this for?

This project is designed for a wide range of audiences, including local and county governments, planning staff, non-profits, advocacy groups, the general public and agencies such as the Federal Highway Administration, U.S. Department of Transportation, Pennsylvania Department of Transportation, PA Department of Community and Economic Development and PA Department of Conservation and Natural Resources