

> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

## COMPREHENSIVE PLANNING COMMITTEE MEETING Tuesday, October 21, 2025, 12:00 noon AGENDA

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

**Roll Call** 

Courtesy of the Floor

#### **Committee Business**

- ACTION ITEM: Plainfield Township Zoning Ordinance Amendment Waste Disposal Tonnage (JS)
- 2. ACTION ITEM: Plainfield Township Land Use of Regional Significance Grand Central Landfill Eastern Expansion (JS, SM)
- 3. ACTION ITEM: North Whitehall Township Curative Amendment Mechanics Shops as Home-Based Businesses (JS)
- 4. ACTION ITEM: Whitehall Township Zoning Map Amendment 810 Jefferson Street (JS)
- 5. INFORMATION ITEM: Lehigh County Industrial Land Use Guide Project Update (JS)
- 6. INFORMATION ITEM: Housing Supply and Attainability Strategy Project Update (JS)

**Next Comprehensive Planning Committee Meeting:** 

November 18, 2025, at 12:00 pm



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

October XX, 2025

Ms. Paige Stefanelli, Manager Plainfield Township 6292 Sullivan Trail Nazareth, Pennsylvania 18064

Re: Zoning Ordinance Amendment – Waste Disposal Tonnage Plainfield Township Northampton County

Dear Ms. Stefanelli:

The Lehigh Valley Planning Commission (LVPC) will consider the 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 will be virtual, and we encourage your participation:

- LVPC Comprehensive Planning Committee Meeting
  - October 21, 2025 at 12:00 PM
  - https://lvpc.org/lvpc-meetings
- LVPC Full Commission Meeting
  - October 23, 2025 at 7:00 PM
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The proposal amends the Plainfield Township Zoning Ordinance pertaining to *Specific Standards for Conditional Uses – Sanitary Landfill Involving the Disposal of more than 100 tons of solid waste per day* (Section 27-320.I.22). The ordinance currently limits disposal to an average of 1,200 tons per day over any calendar month, with a maximum of 1,500 tons per day. The amendment increases these limits to an average of 2,750 tons per day over any calendar month, with a maximum of 3,000 tons per day, to reflect the landfill's current operating volumes as permitted by the Pennsylvania Department of Environmental Protection (DEP).

This amendment aligns local regulations with existing DEP authorizations and aligns with *FutureLV: The Regional Plan* by 'providing environmentally responsible and economical solid, electronic, and hazardous waste disposal and recycling' (of Policy 3.2). Maintaining regulatory consistency with state oversight helps ensure the continued

safe and efficient operation of a regionally significant solid waste facility, contributing to 'the fiscal health and sustainability of municipalities' (of Policy 4.6).

Municipalities, when considering ordinances and 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 regarding the content of this letter, please do not hesitate to call.

Sincerely,

Jill Seitz

Chief Community and Regional Planner

cc: Amy Kahler, Township Administrative Assistant/Secretary.



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

October XX, 2025

Ms. Paige Stefanelli, Manager Plainfield Township 6292 Sullivan Trail Nazareth, Pennsylvania 18064

Re: Grand Central Landfill East Expansion – Land Use of Regional Significance Plainfield Township Northampton County

Dear Ms. Stefanelli:

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 will be virtual, and we encourage your participation.

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The application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Landfills and other Solid Waste Facilities category. The proposal consolidates 18 parcels into a 210.9-acre lot and expands the existing landfill located at 1963 Pen Argyl Road (parcel numbers E8 13 001, E8 13 002, E8 13 003, E8 13 004, E8 13 005, E8 13 006, E8 13 007, E8 13 008, E8 13 010, E8 13 011, E8 13 012, E8 13 013, E8 13 014, E8 13 14A, E8 13 015, E8 13 016, E8 13 16A and E8 13 017). The proposed landfill area is approximately 95 acres.

# **Background**

The site proposed for landfill expansion is bounded by Pen Argyl Road to the west, Delabole Road to the south, Bocce Club Road to the north, and a rail right-of-way to the east. The existing landfill operation is to the west, Pen Argyl Borough is to the north, and exurban and agricultural areas are to the east and south.



Vicinity Aerial - Google Imagery

#### **Site Suitability**

The northern half of the project site is designated as Exurban in the General Land Use Plan of FutureLV: The Regional Plan. FutureLV describes Exurban areas as generally lacking the characteristics necessary to support new development and are intended to remain in rural uses. However, the project site is directly adjacent to the existing landfill, which reflects that solid waste uses are already established in the immediate vicinity and that the area has previously accommodated this type of land use.

The southern portion of the site is designated as Farmland Preservation in the General Land Use Plan. The site also contains High and Medium Conservation Priority Natural Features including woodlands to the north and southeast, steep slopes to the south, and wetlands along Waltz Creek to the east (*FutureLV* Natural Resources Plan). Development within these areas conflicts with *FutureLV* objectives to 'conserve and manage natural lands' (of Policy 3.1).



FutureLV General Land Use Plan

#### **Environment**

The project site contains approximately 111.9 acres of woodlands. The site plan indicates that approximately 54.7 acres of wooded areas will be removed and 57.2 acres will be retained in the development process. Delineated wetlands, which have been formally identified and mapped through field investigation as meeting federal and state criteria for wetlands based on their soils, vegetation, and hydrology, are also retained along the eastern side of the site, although portions of wetlands in the southern area extend into a Met-Ed easement.

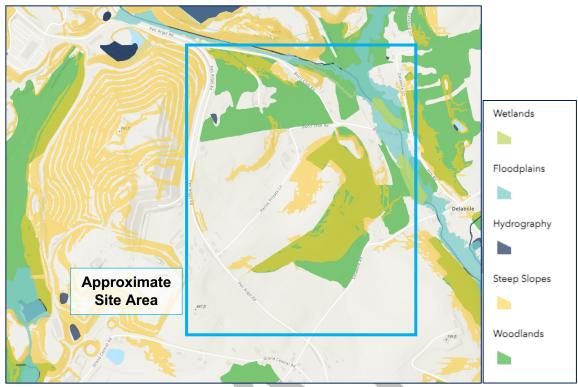
The Overall Site Plan shows that the proposed grass drive and berm on the northeast edge of the proposed landfill area to be 100 feet away from the delineated wetland boundary. The LVPC recommends ensuring that all land disturbance areas are at least 150 feet away from the exceptional value wetland boundary per Pennsylvania Riparian Buffer regulations Title 25, Chapter 102 (PA Title 25, § 102.14(a) (1)) (of FutureLV Policy 3.1).

The Township's recent rezoning of the site to Solid Waste Processing and Disposal District reflects an intent to facilitate expansion and continued operation of the existing landfill. The LVPC strongly recommends further 'preserving natural resources in the land development process' (of Policy 3.1) by reducing the extent of the proposed landfill area to avoid disturbance of steep slopes and additional woodland loss.

The LVPC recommends the Township pursue assurances that the proposed landfill area will not encroach on surrounding natural resources in the future. This can be accomplished by a land protection tool such as a conservation easement, land dedication, or memorializing agreements in the notes on recorded plans as to the limits of disposal.

The existing conditions map should specify the species and sizes of trees proposed for removal and include a summary table quantifying total removals. The landscaping plans should include a detailed summary of tree impacts and proposed replacement species and size. We recommend that the landscape plan be prepared by a licensed Landscape Architect to ensure professional oversight of design and compliance with Township standards.

The LVPC recommends that the Township not waive the street tree requirement. While there are currently existing trees along some of the roadway frontage, an arborist evaluation should verify whether the trees to be retained satisfy the intent of the ordinance. All proposed new plantings should prioritize native and climate-resilient species to 'preserve, protect and restore the natural environment to promote resiliency' (of *FutureLV* Policy 3.1). Additionally, the Township should confirm that all tree removal and replacement activities comply with the requirements of the Township Zoning Ordinance (Section 27-518), ensuring that landscape design contributes to long-term environmental quality and visual compatibility with the surrounding area.



LVPC Mapping of Existing Natural Features

## Municipal and Regional Solid Waste Management

The proposal facilitates the continued operation of a regionally significant landfill, which aligns with the *FutureLV* objectives to 'provide environmentally responsible and economical solid, electronic, and hazardous waste disposal and recycling' (of Policy 3.2) and to 'promote the fiscal health and sustainability of municipalities' (of Policy 4.6).

Maintaining local solid waste disposal capacity provides opportunities to reduce the need for long-distance waste transport, which helps limit associated emissions from hauling vehicles and supports long-term fiscal sustainability through continued host fees and service stability.

## **Transportation**

A traffic impact study (TIS) dated August 2025 was submitted with the application. Trip generation calculations within the TIS were based on field counts conducted along haul roads by the applicant. LVPC staff reviewed these calculations utilizing the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11<sup>th</sup> edition ITE Land Use Code 170 "Utility". The ITE Utility land use is defined as "a free-standing building that can house office space, a storage area, and electromechanical or industrial equipment that support a local electrical, communication, water supply or control, or sewage treatment utility". Based on the ITE, the landfill currently generates approximately 177 trips per weekday, and the TIS indicates that the proposed expansion will not increase trip generation.

The project site is not located near major corridors. The LVPC strongly recommends that the applicant be required to prepare a truck routing and infrastructure viability plan to identify critical transportation infrastructure necessary for the safe and efficient operation of the facility. Maintaining the long-term viability of roadway assets is essential to both the project and

surrounding communities. Deterioration of the local road network due to heavy vehicle use over extended periods of time could necessitate detours, weight restrictions, or repair projects that would affect residents and businesses (of Policies 2.4 and 2.6).

Truck parking and passenger vehicle parking areas should be future-ready for electrification by including conduit and capacity for electric vehicle charging infrastructure (of Policies 2.5, 3.2 and 3.4). As machinery and fleet equipment transition toward electrification, early investment in infrastructure during this expansion phase will support long-term sustainability.

The LVPC also recommends providing on-site snow removal facilities in safe, designated areas. Pennsylvania law requires snow and ice removal from the tops of commercial vehicles, and facilities that accommodate this activity help ensure safe travel conditions and compliance (of *FutureLV* Policies 5.1 and 5.4).

The surrounding road network lacks multimodal infrastructure such as sidewalks, shoulders, or bike lanes. The Township is encouraged to conduct a Vulnerable Road User (VRU) assessment to determine potential interactions between non-motorized users and freight traffic, and to install appropriate signage or design features to enhance safety (of Policies 2.2 and 2.6).

The Lehigh and Northampton Transportation Authority (LANTA) currently does not provide service near the landfill site. The facility lies outside its service area, with existing LANTA routes operating along PA Route 512 in Wind Gap and Pen Argyl boroughs and along Main Street in Bangor Borough, west and north of the project area. LANTA does not have plans to extend service into the project vicinity. While fixed-route transit service is unlikely, coordination between the Township, the applicant, and LANTA is still encouraged to raise awareness of potential transportation needs for employees and to explore opportunities for future regional mobility connections (of Policy 2.2).

#### **Emergency Access**

The LVPC strongly recommends that the Township coordinate with local emergency service providers to ensure that fire, EMS, and police agencies are adequately prepared to serve the expanded facility and are familiar with site layout, access points, and emergency procedures (of Policies 2.2 and 5.1).

#### **Community Health and Wellbeing**

While solid waste disposal provides a vital regional service, *FutureLV* emphasizes minimizing exposure to environmental hazards and protecting community livability (Policy 3.2). The LVPC strongly recommends the Township ensure that air quality, groundwater, odor, and noise impacts are thoroughly evaluated and mitigated, especially for nearby residential areas, schools, and community facilities.

Ongoing public communication and transparent environmental monitoring must be included as conditions of approval to maintain community trust and support long-term health protection.

## **Regional Coordination**

Given the landfill's proximity to Pen Argyl Borough and Washington Township, and its role as a primary solid waste facility serving Northampton County, the LVPC emphasizes that ongoing intergovernmental coordination is essential to managing regional impacts. *FutureLV* 

calls for municipalities to "coordinate land use decisions across municipal boundaries" (Policy 1.4) to ensure that essential services and infrastructure are planned comprehensively. The Township is encouraged to work closely with its neighboring municipalities and the County to share data, align monitoring and mitigation measures, and address cross-boundary considerations related to transportation, environmental quality, and community health. Such coordination supports consistency in regional decision-making and upholds the shared responsibility to protect the public health, safety, and welfare. The LVPC has copied representatives of adjacent municipalities to further facilitate coordination (Policy 1.4).

Municipalities, when considering ordinances and official maps, 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 regarding the content of this letter, please do not hesitate to call.

Sincerely,

Jill Seitz

Chief Community and Regional Planner

Susan Myerov

Director of Environmental Planning

Evan Gardi

**Transportation Planner** 

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cc: Amy Kahler, Township Administrative Assistant/Secretary; Louise Firestone, Wind Gap Borough Manager; Robin Zmoda, Pen Argyl Borough Manager; Sharon Cifuentes, Washington Township Secretary/Treasurer.



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

October XX, 2025

Mr. Rocco Beltrami, Esquire Solicitor, North Whitehall Township 515 West Hamilton Street Allentown, PA 18101

RE: Curative Amendment – Mechanic Shops as Home Based Businesses North Whitehall Township Lehigh County

Dear Mr. Beltrami:

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 primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

- LVPC Comprehensive Planning Committee Meeting
  - o October 21, 2025 at 12:00 PM
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The Pennsylvania Municipalities Planning Code outlines procedures for landowners who desire to challenge, on substantive grounds, the validity of a zoning ordinance, map or any provision thereof which prohibits or restricts the use or development of land in which they have an interest (§609.1 and §916.1).

The Petitioner has submitted a challenge and curative amendment to the Zoning Ordinance of North Whitehall Township pursuant to §609(e) and §609.1(a) of the Pennsylvania Municipalities Planning Code related to the use of a residential garage for the home occupation of auto repair. The petitioner operates a long-standing home-based mechanic's business on a residential property within the Township's Conservation Residential Zoning District, and seeks to continue this use through amendment of the ordinance.

#### **Proposed Curative Amendment**

The proposed Curative Amendment seeks to make several substantive changes to the North Whitehall Township Zoning Ordinance:

- The proposal amends the definition of 'Auto Repair Garage' by removing the existing provision that prohibits such uses from operating out of a household garage or other accessory building.
- The amendment would revise the Table of Permitted Accessory Uses (§440-36C) to add 'Auto Repair Garage' as a permitted accessory use in all zoning districts.
- The proposal includes multiple revisions to the standards governing home occupation accessory uses (§440-42(9)):
  - These changes would eliminate the requirement that applicants bear the burden of proof to demonstrate compliance with ordinance standards, and instead authorize the Zoning Hearing Board to impose conditions based on an individualized assessment of impacts associated with each application.
  - The amendment would also modify the list of permitted home occupations to explicitly include 'auto repair garage,' while deleting the existing language limiting such uses to installation of auto accessories that are not part of a vehicle's drivetrain.
  - Finally, the proposal would remove the list of uses currently prohibited as home occupations, thereby broadening the range of business activities that could be conducted from residential properties.

The LVPC reviewed the challenge and amendments against the goals and policies of *FutureLV:* The Regional Plan and offers comments to the Township for consideration in the Curative Amendment Process. The review comments evaluate two aspects of the proposal:

- 1) The substance of the challenge: does the challenge and curative amendment have merit? (Per MPC §916.1)
- 2) Impacts of the curative amendment: what impact does the curative amendment bear on the site and to the Township as a whole? (Per MPC §609.1 (5))

## 1) The Substance of the Challenge

The proposed curative amendment states that 'the Township Code unconstitutionally prohibits the use of a residential garage for the home occupation of auto repair without individualized assessment', that 'the prohibition bears no real and substantial relation to the public health, safety, and welfare', and that 'the Township Code's regulation of property used for a home auto mechanic garage is unreasonably, irrationally, arbitrarily, and capriciously more restrictive than lesser restricted yet similarly-situated uses of property'.

The Pennsylvania Municipalities Planning Code provides a clear definition of 'No-impact home-based business', which is 'a business or commercial activity administered or conducted as an accessory use which is clearly secondary to the use as a residential dwelling' (§107), and further outlines criteria that the business or commercial activity must satisfy in order to be classified as no-impact:

- The business activity shall involve no customer, client or patient traffic;
- The business activity shall be compatible with the residential use of the property and surrounding residential uses;

- The business shall employ no employees other than family members;
- There shall be no display or sale of retail goods and no stockpiling or inventory of a substantial nature;
- There shall be no outside appearance of a business use, including, but not limited to, parking, signs or lights;
- The business activity may not use any equipment or process which creates noise, vibration, glare, fumes, odors or electrical or electronic interference, including interference with radio or television reception, which is detectable in the neighborhood;
- The business activity may not generate any solid waste or sewage discharge, in volume or type, which is not normally associated with residential use in the neighborhood;
- The business activity shall be conducted only within the dwelling and may not occupy more than 25% of the habitable floor area; and
- The business may not involve any illegal activity (No-Impact Home-Based Business Definition, MPC).

Under the MPC definition, a home-based mechanic's shop does not qualify as a 'no-impact home-based business' because its operational characteristics produce measurable impacts beyond those normally associated with a residential property. Noise may be generated by power tools and engines, customer traffic is necessary for customers to drop off and pick up vehicles, and auto repair produces waste oils and fluids not typical of a household.

Municipalities may still regulate all other types of home occupations if they choose. The Township Zoning Ordinance does permit a range of home occupations (Township Zoning Ordinance §440-30), and provides for variance or special exception relief through the Zoning Hearing Board, ensuring a lawful path for individualized consideration. Therefore, the LVPC finds that the substantive challenge lacks sufficient merit to establish that the Township's ordinance is exclusionary or inconsistent with statewide planning principles.

#### 2) Impacts of the Curative Amendment

The MPC outlines five factors that the municipal governing body shall consider related to curative amendments (§609.1(c)). The LVPC reviewed the curative amendment against *FutureLV: The Regional Plan* and the factors outlined in the MPC and offers the following comments:

§609.1(c)(1) The impact of the proposal upon roads, sewer facilities, water supplies, schools and other public service facilities;

While an individual home-based auto repair use typically generates limited additional trips, the proposed curative amendment would be applicable across the entire Township. Universal allowance of such uses by right throughout residential districts could cumulatively increase traffic and introduce safety and parking conflicts on local roads not designed for frequent vehicle delivery or tow-truck access. Allowing higher-intensity home occupations without limits may also strain emergency-service access and increase noise or emissions exposure, and does not align with the intent of *FutureLV* to 'promote safe and secure community design' (of Policy 5.1).

§609.1(c)(2) If the proposal is for a residential use, the impact of the proposal upon regional housing needs and the effectiveness of the proposal in providing housing units of a type actually

available to and affordable by classes of persons otherwise unlawfully excluded by the challenged provisions of the ordinance or map;

The amendment would not contribute meaningfully to regional housing supply or attainability objectives under *FutureLV* Policy 4.5. However, residential districts are intended to maintain quiet, low-intensity environments, and the proposed amendment may alter residential character and quality of life if applied broadly, potentially discouraging reinvestment in neighborhoods.

§609.1(c)(3) The suitability of the site for the intensity of use proposed by the site's soils, slopes, woodlands, wetlands, flood plains, aguifers, natural resources and other natural features:

Automotive repair inherently involves mechanical equipment, occasional outdoor storage of vehicles or parts, and potential handling of automotive fluids that introduce environmental risks inconsistent with minimizing development impacts (of *FutureLV* Policy 3.2). While limited, small-scale vehicle repair could be suitable in certain residential settings with proper safeguards in place, the broadly sweeping nature of the proposed amendment poses concern. As drafted, it would permit auto repair garages as an accessory use across all zoning districts without differentiating between appropriate contexts or establishing limits on intensity, scale, or environmental sensitivity. This lack of distinction increases the likelihood of conflicts with surrounding residential uses and natural features, and could lead to adverse impacts in areas where soils, topography, or groundwater conditions are not suitable for higher-intensity mechanical activity.

§609.1(c)(4) The impact of the proposed use on the site's soils, slopes, woodlands, wetlands, flood plains, natural resources and natural features, the degree to which these are protected or destroyed, the tolerance of the resources to development and any adverse environmental impacts;

While the petition concerns an existing property, adoption of the amendment Township-wide would apply to numerous parcels in conservation or rural residential areas containing woodlands, steep slopes, and water resources. Expansion of mechanical uses in these areas could increase risk of fluid contamination and impervious surface impacts, contrary to promoting the protection of natural resources and high-priority lands (of *FutureLV* Policy 3.1).

§609.1(c)(5) The impact of the proposal on the preservation of agriculture and other land uses which are essential to public health and welfare.

Permitting automotive repair as a by-right home occupation across residential zones, which include agricultural areas, may introduce incremental non-agricultural uses in otherwise conserved areas, counter to 'preserving farmland and open space by directing development to designated areas' (of *FutureLV* Policies 1.3 and 3.3).

While the petition and challenge pertain to a specific property, the proposed curative amendment has wider implications beyond a single property, and zoning must be evaluated for its community-wide impacts. The proposed curative amendment would establish a Township-wide precedent permitting auto repair garages as accessory uses in all residential districts, potentially resulting in unintended impacts on neighborhood character, noise, and environmental quality.

The LVPC finds that the Township's ordinance, as written, provides adequate mechanisms for individualized relief and does not constitute a blanket exclusion of reasonable home occupations. The proposed curative amendment does not align with *FutureLV: The Regional Plan*, particularly policies calling for contextually situating land use and development to minimize impacts (of Policies 1.1, 3.2 and 5.4), preserving, protecting and enhancing natural resources (of Policy 3.1), and enhancing planning and emergency response efforts to protect public health, safety, and welfare (of Policy 5.1). The proposed curative amendment, if enacted, would create Township-wide inconsistencies and potential conflicts among residential land uses and is therefore not recommended for adoption.

Municipalities, when considering Curative 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 feel free to reach out if you have any questions.

Sincerely,

Jillian Seitz
Chief Community and Regional Planner

cc: Randy Cope, Township Manager



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

October xx, 2025

Lee Rackus, Planning Director Whitehall Township 3219 MacArthur Road Whitehall, PA 18052

Re: Whitehall Township – Zoning Map Amendment Whitehall Township Lehigh County

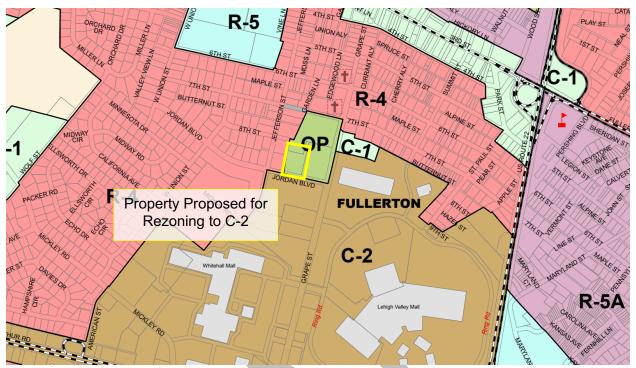
Dear Ms. Rackus,

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 will be virtual, and we encourage your participation.

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The application proposes to amend the official zoning map of Whitehall Township by rezoning an approximately 1.24-acre parcel (Parcel Identification Number 549892055870) owned by Catawba Associates-Allentown, LLC from Office Park (OP) to Regional/Community Commercial (C-2) Zoning District.

The parcel is located near the intersection of Jefferson Street and Jordan Boulevard and is adjacent to an existing residential neighborhood and the Grape Street shopping centers. The property is currently split-zoned between the Medium Density Residential (M-4) Zoning District and the Office Park (OP) Zoning District. It is contiguous with an existing parcel located in the C-2 District.



Whitehall Township Official Zoning Map

# **Adjacent Site Compatibility**

The parcel is located in the Development area of the General Land Use Plan identified in *FutureLV: The Regional Plan*. Development areas are appropriate for a variety of uses including major commercial development given its utility and transportation infrastructure capacity as well as contiguity with existing commercial developments.



Google Maps Aerial Imagery

The OP District is intended to function as a transitional buffer between high-intensity commercial development and nearby residential neighborhoods (Township Ordinance Section 27-67.E). Rezoning the parcel from Office Park (OP) to Community Commercial (C-2) would remove that transitional role and instead permit by right a range of more intense, vehicle-oriented, and outdoor commercial uses that may not be compatible with the adjacent residential neighborhood. While the parcel is relatively small in size (1.24 acres), vehicle-oriented land uses such as car washes and fast-food restaurants permitted in the C-2 District often require small footprints while still generating substantial lighting, noise, traffic, and operational impacts.

In guiding the location and intensity of development and promoting context-appropriate growth (of Policies 1.1 and 5.4), the Township should consider both the short- and long-term implications of rezoning. While the Grape Street corridor is designed for commercial activity, nearby local streets such as Jefferson Street and Jordan Boulevard may not safely accommodate increased vehicle trips, delivery vehicles, or truck access associated with C-2 uses.

Given these considerations, the Township should exercise caution in approving a zoning map amendment that would expand the list of by-right uses in a location immediately adjacent to existing homes. Once rezoned, the Township would have limited discretion to restrict or condition specific uses, as they would be permitted by right under the ordinance. A more targeted approach to address the applicant's site-specific needs would be to seek relief through the Zoning Hearing Board. This process would allow the Township to evaluate the specific proposal, assess potential neighborhood impacts, and apply appropriate conditions to protect community character and minimize impacts of development (of Policy 3.2).



Proposed Zoning Map Amendment

## **Split Zoning**

The subject parcel is currently split-zoned as both Medium Density Residential (R-4) Zoning District and Office Park (OP) Zoning District. If rezoning is to proceed in the future, the LVPC recommends the Township require the parcel to be subdivided prior to or as a condition of the proposed rezoning. Clear separation of uses reduces site layout and building constraints, removing barriers that would discourage future development and 'encourages an efficient development process that is responsive to regional needs' (of Policy 1.4)

Municipalities, when considering Zoning 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)]. Sincerely,

Mary Grace Collins

LVPC Community Fellow

Jill Seitz

Chief Community and Regional Planner