



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

JOINT ENVIRONMENT AND COMPREHENSIVE PLANNING COMMITTEE MEETING

Tuesday, October 22nd, 2024, 11:30 AM

AGENDA

THE MEETING CAN BE ACCESSED AT <https://tinyurl.com/LVPC2024> OR VIA PHONE 610-477-5793 Conf ID: 928 251 831#.

Roll Call

Committee Business:

1. *ACTION ITEM:* Lowhill Township – Private Request to Revise Official Act 537 Plan (JS, CR, SM)
2. *ACTION ITEM:* Lower Nazareth Township – Land Development – Apartments at Evergreen Farms (JS, CR, SM)

COMPREHENSIVE PLANNING COMMITTEE MEETING

Tuesday, October 22nd, 2024, 12:00 noon

AGENDA

THE MEETING CAN BE ACCESSED AT <https://tinyurl.com/LVPC2024> OR VIA PHONE 610-477-5793 Conf ID: 928 251 831#.

Roll Call

Courtesy of the Floor

Staff Introductions

1. Chief Transportation Planner, Humaira Nabeela
2. Director of Development, Samantha Pearson

Committee Business:

1. *ACTION ITEM:* South Whitehall Township – Land Use of Regional Significance - Parkland School District Phase 4 (JD)
2. *ACTION ITEM:* Plan Slate Belt Multi-Municipal Comprehensive Plan (JS)
3. *ACTION ITEM:* Upper Nazareth Township – Comprehensive Zoning Ordinance and Map Update (JS, BH, SM)
4. *ACTION ITEM:* Lowhill Township – Comprehensive Zoning Ordinance and Map Update – (JD, BH, SM)
5. *ACTION ITEM:* Lowhill Township – Official Map (JS)

Next Comprehensive Planning Committee Meeting:
November 19, 2024, at 12:00 pm



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Mr. Scott F. Novatnak, Planning Section Chief, Clean Water Program
Pennsylvania Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18701-1915

**Re: Private Request to Revise Official Act 537 Plan
Lowhill Township
Lehigh County**

Dear Mr. Novatnak:

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Environment Committee, Comprehensive Planning Committee and Full Commission meetings, pursuant to Pennsylvania Department of Environmental Protection (DEP) regulations, 25 Pa. Code., 71.14. Meeting details are below:

- LVPC Joint Environment and Comprehensive Planning Committee Meeting
 - October 22, 2024 at 11:30 AM
- LVPC Full Commission Meeting
 - October 24, 2024 at 7:00 PM

The LVPC was notified and invited to comment on correspondence received by DEP from the applicant requesting DEP to order Lowhill Township to revise its Official Sewage Facilities Plan by issuing a resolution of approval for the Sewage Facilities Planning Module submitted by the applicant for the property located at 2951 Betz Court.

The LVPC appreciates the opportunity to comment on the private request. While economic growth and infrastructure expansion are important, it is crucial to consider the long-term environmental, social, and economic consequences of expanding public utility infrastructure in rural areas rich in natural resources. Based on assessment of the proposal and its potential impacts, the LVPC believes that expanding public utility infrastructure in this context would be detrimental to the Township and region. The following comments are provided for consideration by DEP, per Section 71.14 (d):

Background

The area around the project site is identified as a Neighborhood Center in the Township's adopted comprehensive plan, *Plan Northern Lehigh*, a multi-municipal comprehensive plan including five other municipalities that together form the Northern Lehigh area. The Neighborhood Center, located approximately at Route 100 and Kernsville Road, contains a cluster of small-scale establishments serving the community. Surrounding land uses include low

density residential dwellings to the west and east, a day care center to the south, and small commercial businesses to the northeast. The general area is exurban/rural in nature with limited existing development, roadway and utility infrastructure. The nearest existing utility infrastructure is located one mile to the south along Route 100.

The property is located within an area identified in *FutureLV: The Regional Plan* for Farmland Preservation, where little to no development should occur. At the local level, *Plan Northern Lehigh* identifies the area as Exurban and within the Preservation Buffer. Exurban areas have few or none of the factors necessary for development, and are most suitable for low intensity agriculture-supportive businesses and low density housing. Areas within the Preservation Buffer may be appropriate for reasonable and contextually sensitive development if certain Development Criteria are met (*PlanNL* Page 51), including how the site is identified in the municipal official map, zoning ordinance and Act 537 Sewage Facilities Plan. The area also contains High Priority Natural Resources identified for conservation, including an unnamed tributary to Jordan Creek, multiple wetland areas, riparian buffers, steep slopes and woodlands, another element of consideration in the Development Criteria.

Impacts of Public Utility Expansion

The proposed extension of the community water system is not recommended in areas designated for farmland preservation in *FutureLV*. Development should occur in areas with public sewer and water capacity (of *FutureLV* Policy 3.2), and infrastructure expansions should be incremental based on growth patterns and should not “leap-frog” through undeveloped areas. *FutureLV* aims to ‘minimize and mitigate the impacts of utility expansion’, and therefore the proposal is inconsistent with *FutureLV* policies (of *FutureLV* Policy 3.2).

While the Private Request refers to a single development proposed at 2951 Betz Court, two other developments of similar scale are proposed within one mile of each other. The proposal to extend public sewer to the area poses triple the magnitude of impact, even before considering how public utility infrastructure will influence future development pressure in the Township. Expanding public utility service to the Kernsville Road/Route 100 Neighborhood Center increases development pressure on natural areas to the north that contain habitats and local ecosystems reliant on unfragmented natural and agricultural landscapes. Infrastructure expansion and resulting development would threaten wildlife and reduce biodiversity in nearby Natural Heritage Inventory Core Habitat and Supporting Landscape areas, as well as the Existing Regional Parks (State Game Lands and Trexler Preserve) which also contain identified Local Natural Areas.

Extending public utilities to support large-scale developments in a rural area come with high costs. These costs are often borne by local governments and taxpayers, who may see little return on investment. Rural areas have limited population density, so the cost per capita to maintain infrastructure could become unsustainable long-term. Additionally, the extension of utility infrastructure may require mandatory hookups for adjacent residents, which can cost residents tens of thousands of dollars and would be detrimental to the fiscal health and sustainability of the Township and residents (*FutureLV* Policy 4.6).

Municipal Planning Processes

The Township adopted the *Northern Lehigh Multi-Municipal Comprehensive Plan* in October of 2022, an update to the first Plan created in 2004. The updated plan reflects the intent of all six municipalities, including Lowhill Township, to direct growth to areas of Northern Lehigh able to accommodate development of appropriate scale.

Efforts are underway to revise the zoning ordinances and maps, and to create official maps, for all six Northern Lehigh municipalities. These communities are working together to coordinate sharing of land uses to provide for all land uses in strategic locations across the Northern Lehigh region and minimize adverse impacts of development on the communities and community goals. Lowhill Township's Draft Zoning Ordinance, Zoning Map and Official Map are currently in the 45-day review and comment period and nearing adoption.

Both the Comprehensive Plan Update and Coordinated Zoning and Official Map are essential updates to the Township's planning policies and land use regulations as a precursor to future updates of other municipal regulatory documents, such as the Township's Act 537 Plan. *Plan Northern Lehigh* specifically states that it is Township policy to 'Implement adopted Act 537 Sewage Facilities Plans to ensure the logical provision and extension of public sewer service' (*PlanNL* Policy 6.7). The connection between the adopted comprehensive plan and adopted Act 537 plan is intentional to ensure that land use policy and the Act 537 plan as an implementation tool are both working to achieve Township goals.

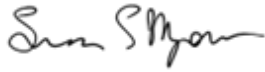
Other Challenges

Beyond the impacts of extending utility infrastructure, numerous challenges remain that threaten the viability of large-scale development in the area. Roadway infrastructure was not built to accommodate commercial freight vehicles, and transit is not available to support workers traveling to and from jobs. The Township's Rural Village Zoning District was created to provide small-scale community-supportive businesses and services in a rural area, and both the building mass and land use of proposed development to be served by public utilities is incompatible with existing adjacent land uses.

Overall, the long-term environmental, social and economic consequences of extending public utility infrastructure to facilitate large-scale development are likely to be detrimental to the rural community. The Township's natural resources, rural character and agricultural base are irreplaceable assets that would be compromised by development not contextually suitable for the location. The LVPC urges the Department of Environmental Protection to carefully consider the potential irreversible impacts on the environment and community, and to prioritize the preservation of rural areas for agriculture, conservation, and sustainable, low-impact development.

The LVPC has copied representatives of the *Northern Lehigh Multi-Municipal Comprehensive 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,



Susan Myerov
Director of Environmental Planning



Jill Seitz
Chief Community and Regional Planner



Corinne Ruggiero
Environmental Planner

cc: Jill Seymour, Lowhill Township Secretary; Tammy White, Lynn Township Supervisor; Janice Meyers, Heidelberg Township Administrator; Brian Carl, Weisenberg Township Manager; Jeralyn Schoch, Slatington Borough Mayor; Wade Marlatt, Washington Township Manager



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Ms. Lori Seese, Planning and Zoning Administrator
Lower Nazareth Township
623 Municipal Drive, Suite 220
Nazareth, PA 18064

**RE: Apartments at Evergreen Farms – Land Development
Lower Nazareth Township
Northampton County**

Dear Ms. Seese:

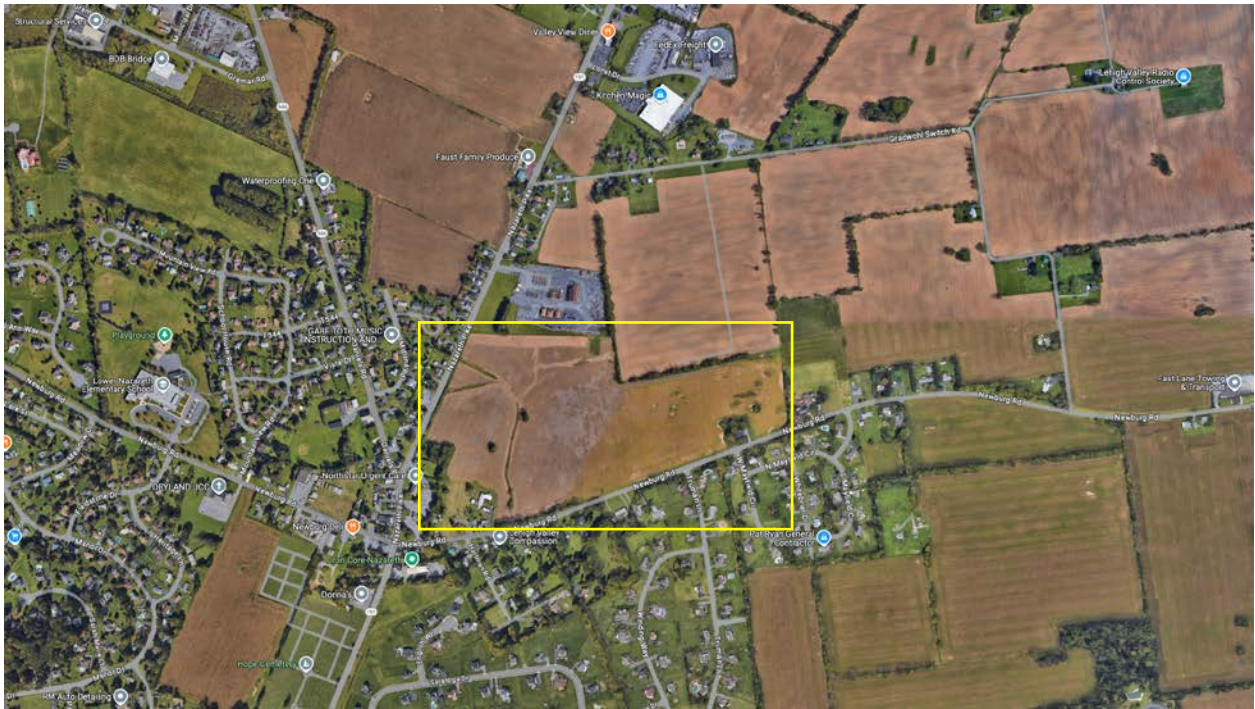
The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Joint Environment and Comprehensive Planning Committee and Full Commission meetings. Discussion on agenda items primarily takes place during the Committee meeting, and we welcome your participation. Meeting information is available below:

- LVPC Joint Environment and Comprehensive Planning Committee Meeting
 - October 22, 2024 at 11:30 AM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - October 24, 2024 at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to construct six garden apartment buildings totaling 144 apartment units and a 2,800-square-foot community center. The project is located on Nazareth Pike and Newburg Road (parcel number L7 3 2). A subdivision is also proposed to facilitate the development.

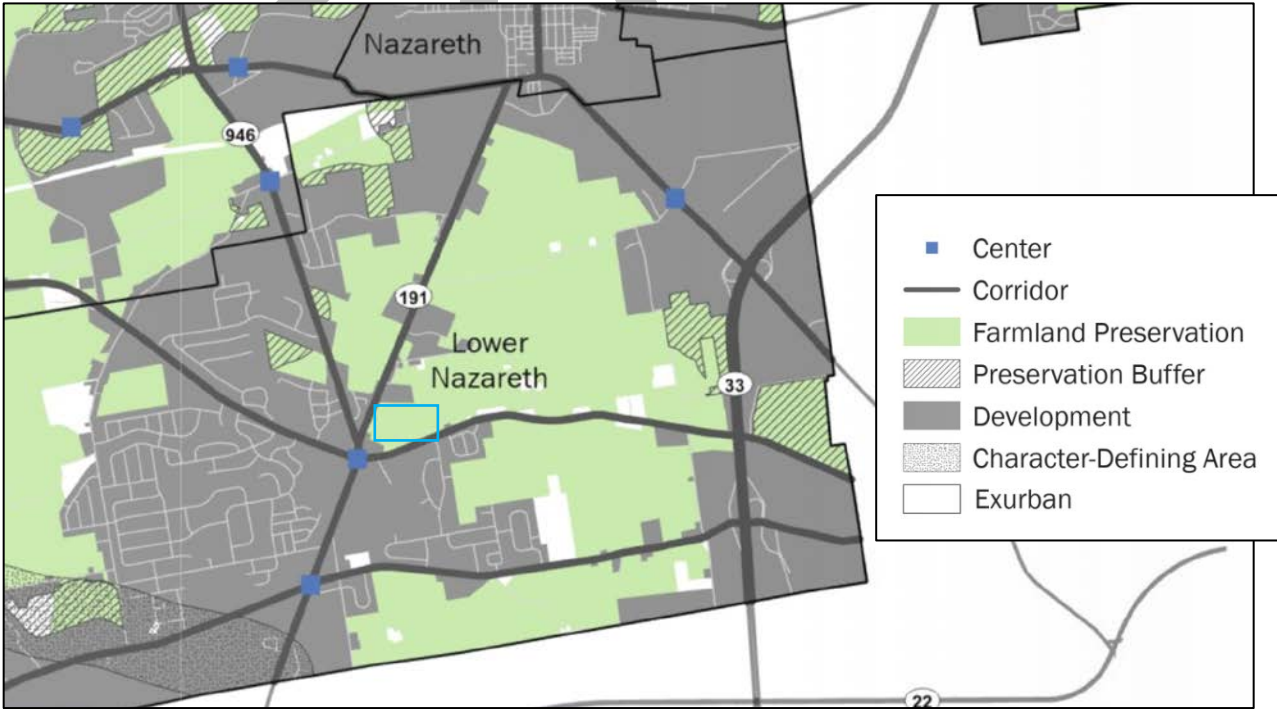
Background

The 61-acre lot is undeveloped agricultural land, and the surrounding area contains existing residential neighborhoods to the northwest, small businesses to the south along Nazareth Pike, and agricultural lands to the northeast.



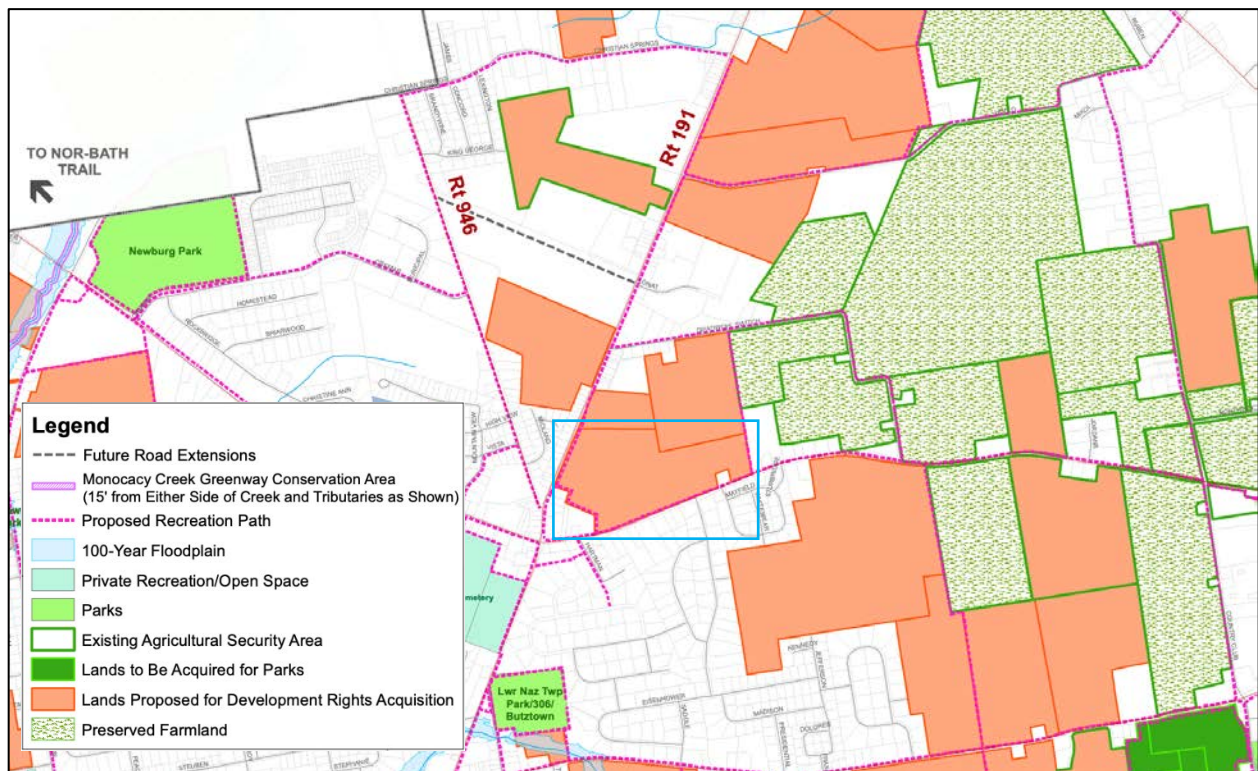
The majority of the site is located in the Farmland Preservation Area identified in *FutureLV: The Regional Plan*, with the southwest portion of the site facing the Nazareth Pike/Newburg Road intersection in the Development area.

In the *Nazareth Area Multi-Municipal Comprehensive Plan (NazPlan)* Future Land Use Plan, the site is identified for Farmland Preservation.



The portion of the site with frontage along Nazareth Pike (Route 191) is in the Village Mixed-Use (TD6) Zoning District and Route 191 Traffic Management Overlay, and the remainder of the property is in the Agriculture (TD1) Zoning District, according to the Township Zoning Map. Multi-Family Dwellings (Apartments) are a permitted use in the TD6 District.

The site is identified on the Township Official Map for Lands Proposed for Development Rights Acquisition. Both Nazareth Pike (Route 191) and Newburg Road are also identified for a Proposed Recreation Path.



Site Suitability

According to *FutureLV: The Regional Plan*, Farmland Preservation areas are recommended to remain agriculture, and any development should be agriculture-supportive businesses or low density residential. Although the designated zoning reflects the intent of the Township to facilitate mixed-use development along Route 191, development must be contextually sensitive to surrounding land uses, transportation infrastructure and available utilities. The Township's recently updated Planning Policy and Implementation Tools – the *Nazareth Area Multi-Municipal Comprehensive Plan* and the Official Map – reflect an intent by the Township to retain the site for agriculture.

The project site lacks necessary public utility infrastructure to accommodate the scale of the proposal. Public sewer access is not available, resulting in half of the site to be used to accommodate septic systems serving the development. Nine Primary Septic areas are proposed, totaling 101,100 square feet, and five Replacement Septic areas are proposed, totaling 32,500 square feet. This does not align with the intent of *FutureLV* to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1) or the intent of *NazPlan* to 'strengthen utility infrastructure of the region' (of *NazPlan* Policy 1.2).

Additionally, the proposal does not include equivalent areas of tested replacement septic compared to primary septic areas. Providing an equivalent area for replacement septic is a recommended best practice, and the proposal does not protect the quality and quantity of surface water and groundwater (of Policy 3.2). The provision of a tested replacement absorption area would ensure a future safeguard in the event of a non-repairable primary area malfunction.

Development of the proposed intensity should occur in areas with public sewer capacity, and the area along Route 191 was not intended for development of the proposed scale (of *FutureLV* Policy 3.2). Although the region has a substantial housing need, development cannot occur at the expense of the public health, safety, welfare and general interest (of Policy 1.1). If the proposal moves forward for development the LVPC strongly recommends reducing the size of the development to buildings with roadway frontage to better align with the context of the area and what infrastructure can handle (of *FutureLV* Policy 5.4).

Environment

Mapping provided by the Pennsylvania Department of Conservation and Natural Resources (Bureau of Topographic and Geologic Survey) indicates the extensive presence of karsts in the form of surface depressions on the site. Sinkholes are shown on the site plans in the septic and agricultural areas, but the existing sinkholes are not identified in the areas of proposed development on the site plan. *FutureLV* discourages development in hazard-prone areas (of Policy 3.2).

The site plan should be revised to thoroughly avoid development in areas with sinkholes. Proper geotechnical testing is crucial prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (Policy 3.2).

Additionally, on-lot sewer systems must be sited in accordance with the Township's carbonate standards, as the presence of sinkholes indicates the need for specialized study to minimize potential risks of groundwater contamination. The LVPC recommends referring to the document *Sinkhole Issues: Background and Recommendations* prepared for the Nazareth Area Council of Governments, and the LVPC is available for further information on recommendations.

Transportation

A Transportation Impact Study (TIS) prepared by Benchmark Civil Engineering Service Inc, dated August 2024 was submitted with the proposal. The TIS included analysis for 48 low rise apartments within 6 individual buildings, which would generate an average of 383 trips per day based on the Institute of Transportation Engineers Trip Generation Manual.

However, the plan set submitted for land development review is for 144 low-rise apartments in six individual buildings. LVPC calculated that 144 apartments would generate an average of 998 trips per day, a discrepancy of 615 vehicle trips from the provided TIS.

It is essential that the submitted TIS be updated to match the submitted plan set of 144 apartments and that any affected analysis be revised to match the intended development on the site plans. Transportation Impact Studies are the basis for planning and traffic monitoring and traffic demand modeling purposes, as well as any future transportation improvement activities that are influenced by developments along the roads that provide connectivity to the development. A copy of an updated TIS should be provided to the LVPC for any future planning or research regarding transportation that may rely on projects and transportation improvements in the area.

The project is located along Route 191, which is identified in *FutureLV* as a Major Corridor connecting the Post-War Center of Bethlehem Square to the south and the Historic Center of Nazareth to the north. This corridor also includes a multimodal accessibility buffer area which is meant to encourage development of alternative modes of transportation along them including sidewalks and bicycle lanes among other attributes. Centers and Corridors depict areas that may be appropriate for higher density development and improved mixed-transportation options (of *FutureLV* Policy 2.1).

No sidewalks are shown on the plans along Newburg Road (State Route 3020) or Nazareth Pike (State Route 191). Pedestrian infrastructure is strongly recommended along both frontages of the project as well connecting from Newburg Road and Nazareth Pike to the apartment complex of buildings. Sidewalks and crosswalks with lighted pedestrian signage would increase safety for pedestrians in the area, and support safe routes to schools for children traveling to the Lower Nazareth Elementary School, located one-third of a mile away from the project site (of *FutureLV* Policy 5.1).

Bicycle accommodations including bicycle racks should be considered on the site plans to provide safe and secure locations for bicycles for employees who may wish to utilize alternative modes of transportation for commuting to work (of *FutureLV* Policy 2.3).

The Lehigh and Northampton Transportation Authority (LANTA) provides service along Nazareth Pike via Route 512 (Bethlehem - Nazareth Plaza). It is strongly recommended that coordination with LANTA occur to explore the possibility of incorporating a transit bus stop to serve the apartment complex (of *FutureLV* Policy 5.3). This potential transit stop location may also be able to accommodate school bus pickups for students who may reside within the apartment complex. Coordination with the Nazareth Area School District is recommended to occur to designate a preferred school bus stop location area for the project as well ensure a safe pickup, waiting and arrival area for students going to or coming home from school (of *FutureLV* Policy 5.2).

The parking lots show electric vehicle charging locations for the future of a transition to electric or hybrid vehicles incorporate electrical vehicle charging, which supports the advancement of transportation technologies and alternatively fueled vehicles (of *FutureLV* Policies 2.5 and 3.4).

Nazareth Pike (State Route 191) from Route 22 to Daniels Drive (State Route 946) is listed as a Congested 2017 Corridor, 2040 Corridor and 2040 Corridor in the Congestion Management Process (CMP) document available at <http://lvpc.org/pdf/LVPC%20CMP%20Report%202016.pdf> . It is recommended that the Township and developer work with the Pennsylvania Department of Transportation (PennDOT) to investigate strategic improvements along this corridor to minimize traffic impacts and congestion resulting from an increase of 998 trips per day.

It should be noted that the Lehigh Valley Transportation Study (LVTS) has a Transportation Improvement Program (TIP) project “SR 191 Lower Nazareth intersection” Multimodal Project Management System (MPMS) project ID 116936 adjacent to the project at the intersection of Nazareth Pike and Daniels Drive with project scope also including Hecktown Road. It is strongly recommended that coordination of any frontage improvements of the project are coordinated with any and all construction and engineering occurring with the PennDOT project (*FutureLV* Policy 2.2 and 2.6).

Stormwater

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

Multi-Municipal Coordination

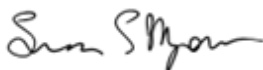
The LVPC has copied representatives of the Nazareth Area Multi-Municipal Comprehensive Plan to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

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

Sincerely,



Jill Seitz
Chief Community and Regional Planner



Susan Myerov
Director of Environmental Planning



Corinne Ruggiero
Environmental Planner

cc: Andrew Micklos, Inn at Evergreen Farms, LLC, Applicant; Mark A. Bahnick, PE, Project Engineer; Bradford Flynn, Bath Borough Manager; Belinda Roberts, Bushkill Township Manager; John Defassio, Chapman Borough Secretary; Stephen Nowroski, Moore Township Manager; Theresa Fedele, Nazareth Borough Clerk; Candace Keller, Stockertown Borough Secretary; Mark Saginario, Tatamy Borough Manager; Lisa Klem, Upper Nazareth Township Manager



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

David Manhardt, Director of Community Development
South Whitehall Township
4444 Walbert Avenue
Allentown, PA 18104

**Re: Parkland School District New Operations Center (Phase 4) – Land Use of
Regional Significance
South Whitehall Township
Lehigh County**

Dear Mr. Manhardt:

The subject application is considered a Land Use of Regional Significance, as 'All' Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 147). The Lehigh Valley Planning Commission (LVPC) will consider the application at its Comprehensive Planning Committee and Full Commission meetings, under the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items primarily takes place during the Committee meeting. Meeting information is available below:

- LVPC Comprehensive Planning Committee Meeting:
 - October 22, 2024, at 12:00PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting:
 - October 24, 2024, at 7:00PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to expand the northern parking lot from 28 to 71 spaces and improve paving at the southern maintenance building at 2619 Stadium Drive (parcel number 547719272143).

The LVPC offers the following comments:

Background

The project parcel is largely undeveloped and currently features the southern maintenance building. Orefield Middle School and Orefield Football Stadium are across Stadium Drive. This project was previously reviewed by the LVPC in December 2022 for a 39,295-square-foot operations center building and again in January 2024 for 12,832-square-foot addition to the second floor.

Transportation

The area contains existing multimodal infrastructure, and the site is served directly by the Lehigh and Northampton Transportation Authority (LANTA) with bus stops at the intersection of Route 309 and Lime Kiln Road. The proposal serves to 'expand access to education and job training' (of Policy 4.1) and invests in schools located in Centers and along Corridors (of Policy 4.3).

The proposed internal sidewalk network and northern crosswalk supports safe and secure community design (Policy 5.1). It is recommended that the developer consider the addition of another crosswalk near the south parking lot for the operations center building and pedestrian-scale lighting along the property frontage. The LVPC recommends the internal sidewalk network near the southern maintenance building be extended to the sidewalk along Stadium Drive to promote 'safe routes to schools' (of Policy 5.2).

Sustainable Systems

The LVPC recommends that educational institutions incorporate environmentally sensitive building and landscape design, such as green roofs or solar panels. This would increase the cost-effectiveness of building operation and further academic endeavors related to these technologies, while enhancing the campus setting, demonstrating environmental leadership within the region, and 'reducing climate change impacts through mitigation and adaption' (of Policy 3.4).

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code [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,



Joseph Dotta
Regional Planner

cc: Dr. Mark Madson, Parkland School District, Applicant; Scott P. McMackin, PE Cowan Associates, Project Engineer/Surveyor; Anthony Tallarida, Township Engineer.



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Slate Belt Comprehensive Plan Steering Committee
615 Waterfront Drive Suite 201
Allentown, PA 18102

**RE: Slate Belt Multi-Municipal Comprehensive Plan – Final Draft
Boroughs of Bangor, East Bangor, Pen Argyl, Portland, Roseto, Wind Gap,
and Townships of Upper Mount Bethel and Washington**

Dear Steering Committee Members:

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
 - October 24, 2023 at 11:00 AM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - October 26, 2023 at 5:30 PM
 - <https://lvpc.org/meetings.html>

The Slate Belt Multi-Municipal Comprehensive Plan brings together eight communities of the Slate Belt region to create their first-ever multi-municipal comprehensive plan. The Draft Plan's major goals include: balancing preservation and development; enhancing and maintaining a high quality of life; improving the efficiency of local and regional governments; increasing the resiliency of the transportation and infrastructure networks; promoting a strong farming community; and a prepared student body and workforce. The Plan provides a strong vision for the area's future with goals reflecting community vision and values and policies and actions developed to achieve those goals with thorough, in-depth, and well-researched plan content.

The Draft Plan serves to promote several goals and policies outlined in *FutureLV: The Regional Plan* through innovative tools and practices that address current and future needs of the region, demonstrating the use of best planning practices (of *FutureLV* Policy 1.4). Additionally, the plan meets all legally required criteria outlined in the Pennsylvania Municipalities Planning Code for Comprehensive Plans.

Balance Between Growth and Preservation

Goal 1: “Balance between growth and preservation” emphasizes sustainable growth and development while preserving the region’s natural and open spaces, which is also the foundation of *FutureLV: The Regional Plan*. The Draft Plan aims to strike a balance between development and preservation by promoting efficient land use, infrastructure investment, and responsible environmental stewardship. Strategies to promote balance include directing development to Centers and Corridors and areas with existing development (Plan Slate Belt Policy 1.1) while taking a conservation-first approach to preserve the region’s character and resources (Plan Slate Belt Policy 1.2 and 1.3). The included “Detailed View” Future Land Use Maps provide each community with detailed tools that support policy decision-making.

High Quality of Life

Goal 2: “A high quality of life” aims to support economic revitalization through downtown redevelopment, strengthening main streets and increasing employment, recreation and housing opportunities. The Draft Plan recognizes the need to invest in the region’s assets to grow the local economy, which supports a “competitive, creative and sustainable region” (of *FutureLV* Policy 4.1). The goal of increasing attainable housing opportunities which directly supports ‘maximizing social and economic opportunities for everyone’ (of *FutureLV* Policy 4.5), and establishing a Slate Belt area park, trail and recreation network increases access to green spaces (of *FutureLV* Policy 5.3).

Efficient Local and Regional Government

Goal 3: “Efficient local and regional government” emphasizes collaboration between municipalities to help provide a framework to streamline community services. The Draft Plan recommends increased coordination between emergency service providers, a regionwide response plan for community emergencies, and collaboration for cost-sharing opportunities. These policies are exemplary of regional collaboration and support ‘evolution and adaptability of government’ (of *FutureLV* Policy 1.1). The Draft Plan aims to alleviate the worsening climate crisis by identifying and incorporating energy efficient practices. The LVPC supports this initiative and encourages further ‘development and implementation of climate action plans’ (of *FutureLV* Policy 3.4).

Resilient Transportation and Infrastructure Network

Goal 4: “A resilient transportation and infrastructure network,” aims to strategically provide transportation and utility infrastructure that keeps residents safe and healthy and operates efficiently, aligning with numerous policies of *FutureLV*. The Slate Belt region contains areas of existing (though aging) infrastructure within the Boroughs, and areas that are rural and exurban with little existing infrastructure. Investments in the Slate Belt transportation and utility infrastructure network have pivotal impacts on directing, accommodating and managing growth and development throughout the region. Goal 4 incorporates considerations for multimodal transportation, which is essential to provide access to daily needs for all people (of *FutureLV* Policy 5.2).

Strong Farming Economy

Goal 5: “A strong farming economy” promotes ‘farming as a community-defining industry and component of the regional identity’ and the expansion of ‘agritourism to support agricultural businesses and retention of farms’ (Plan Slate Belt Policies 5.1 and Policy 5.2). *FutureLV* also identifies farming as an integral part of the Lehigh Valley’s identity and is necessary to supporting the region’s economy, maintain its character and promote agriculture as a regional strength. Increasing business opportunities for local farmers roots economic investments in local assets and will spur economic activity while strengthening the culture and heritage of the Slate Belt area.

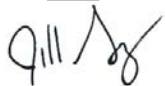
Prepared Student Body and Workforce

Goal 6: “A prepared student body and workforce” includes promoting job training programs and coordinating with the Bangor Area and Pen Argyl Area School Districts to ensure a high-quality education. These policies help make a ‘competitive, creative and sustainable region’ and remove barriers to employment (of *FutureLV* Policy 4.3).

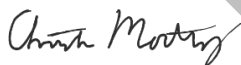
Overall, the Draft Plan provides a practical and solid foundation for long-term sustainability, growth, and infrastructure management in the Slate Belt area. The Draft Plan places and emphasis on coordination between municipalities and other entities, which is a best practice in achieving community goals. The LVPC is supportive of the municipalities in the Plan Slate Belt Multi-Municipal Comprehensive Plan as they continue looking toward the next steps of implementing the Plan.

Municipalities, when considering comprehensive plans and updates, 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 the final Multi-Municipal Comprehensive Plan that is adopted by the Municipalities, per 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



Christian Martinez
Environmental Planner

cc: Stephen Reider, Marissa Donnelly and James Kresge, Bangor Borough; Jason Huggan, Karen Lane and Susan Ruggiero, East Bangor Borough; Robin Zmoda, Tyler Kemp and Joseph LeDonne, Pen Argyl Borough; Lance Prator, Stephanie Steele and Heather Fischer, Portland Borough; Cathy Martino, Joe Angelini and Carl Renna, Roseto Borough; Judy Henckel, David Friedman and Nick Graziano, Upper Mount Bethel Township; John Buck, Justin Huratiak and Robert Smith, Washington Township; Louise Firestone, George Hinton and Wesley Smith, Wind Gap Borough



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Ms. Lisa Klem, Manager
Upper Nazareth Township
1001 Newport Ave.
Nazareth, PA 18064

**Re: Comprehensive Zoning Ordinance and Map Update
Upper Nazareth Township
Northampton County**

Dear Ms. Klem:

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

- LVPC Comprehensive Planning Committee Meeting
 - October 22, 2024 at 12:00 PM
- LVPC Full Commission Meeting
 - October 24, 2024 at 7:00 PM

The application proposes a comprehensive update to the Township's Zoning Ordinance and Zoning Map, following the recent adoption of the updated Nazareth Area Multi-Municipal Comprehensive Plan.

The Township's proposed Ordinance, as specified in Section 103, is intended to carefully relate development to natural features, promote compatibility between land uses, provide for a variety of residential densities and provide opportunities for all housing types, direct higher density development to areas of adequate infrastructure, direct industrial development to locations that will minimize conflicts with homes, direct commercial businesses to existing commercial areas, and promote public health, safety and general welfare.

The following comments are provided to compliment and strengthen the Township's thorough reworking of its zoning ordinance:

Ordinance Administration

The provisions included in the proposed Ordinance align with the Pennsylvania Municipalities Planning Code (MPC), Article VI that grants powers to municipalities to enact, amend and repeal zoning ordinances to regulate the use of land and structures and to implement comprehensive plans (of *FutureLV* Policy 1.4).

The proposed ordinance includes references to the Township Subdivision and Land Development Ordinance (SALDO), where relevant, which is a best practice in helping users navigate the Township's codes.

Designation of Base Zoning Districts

The Township's proposed zoning districts follow a transect format where a series of zones are identified to transition from rural undeveloped areas to denser urban core areas. Allowing a range of densities in areas with appropriate infrastructure reduces development pressure in undeveloped areas and supports retention of open space (of Policy 1.1). The LVPC commends the inclusion of "Quick View" sheets for each zoning district, which provide the district's purpose, permitted uses and lot dimensional standards. The "Quick View" sheets simplify the ordinance, improve its usability and navigability and are a best practice in managing the land development process (of Policy 1.4).

Housing Attainability

The proposal allows a diverse range of housing types throughout its residential Zoning Districts (TD2, TD4 and TD5) as well as in mixed-use Zoning Districts (TD6 and TD9), which serves to 'diversify the price points and types of available housing' (of *FutureLV* Policy 4.5).

The proposed ordinance also includes an 'Increased Density Development Option' (§ 311), to allow flexible residential development that protects environmentally sensitive areas or farmland, provide additional recreation land, reduce municipal maintenance costs and provide for transitional forms of development between residential and agricultural or industrial areas or highways, with increased density serving as a buffer. Increasing flexibility and options for site design, rather than a prescriptive "one size fits all" regulatory approach, is a best practice in managing land use and development in the interest of property owners and developers, the Township and the community overall (of Policy 1.4).

Freight Land Use Management

The Draft Ordinance includes several definitions for different types of warehouse land uses, specified based on characteristics of the facility and goods stored and moved, and align with land uses specified by the Institute of Transportation Engineers.

Transportation

Requirements outlined in § 601: Required Number of Off-Street Parking Spaces may result in unnecessarily large parking lots. Some uses may be able to share parking spaces if their primary uses don't overlap, such as peak demand in the morning versus evening. The LVPC recommends considering the number of required parking spaces for multiple-uses on a case-by-case basis to right-size transportation infrastructure (of Policy 2.2).

As the Township continues to update zoning standards, the LVPC recommends the Township consider revising § 603: Design Standards for Off-Street Parking to allow parking within lot setback or buffer areas and reduce size/width requirements for driveways and parking setbacks to support lower costs and increase the efficiency of land use and development (of Policy 1.4 and 2.2).

Environment

The LVPC recommends adding a definition for personal or rooftop solar energy systems in § 202: Terms Defined, to differentiate from the utility-scale solar definition.

The LVPC recommends 75-foot minimum setbacks from Wetlands per the *Riparian and Wetland Buffers Guide/Model Regulations* (LVPC, 2011). Section § 308 and § 503 should be amended to establish a 75-foot wetland buffer, which may be reduced to a minimum of 20 feet if 75 feet is found to be infeasible.

Within the Increased Density Development Option section, the LVPC encourages the Township consider raising the minimum open space requirement for TD2 to 30%, which would preserve more open space, and still allow nearly same amount of density bonus (§ 311.5.B.1).

- *Example: 10 acres - 2.5 acres of open space = 7.5 acres /15,000 = 21 lots, vs. 10 acres – 3 acres = 7 acres/15,000 sf = 20 lots*

The Increased Density Development Option section should specify the width of areas along perennial streams for protection (§ 311.9.B (1)). These riparian areas are critical in helping to mitigate pollution from stormwater runoff, mitigate flooding, stabilize stream banks, and control sediment. Per the *Riparian and Wetland Buffers Guide/Model Regulations* (LVPC, 2011), a 75-foot buffer is recommended as a minimum standard to achieve water quality benefits, where this width is feasible.

Site plan criteria for the Increased Density Development Option (§ 311.12. B (Landscaping Plan)) should include clearly identifying existing trees, size and species of those to remain and those proposed to be removed. The LVPC encourages the Township to consider developing characteristics that define a *Substantial Tree* in Section §202. This could include references to the Township's list of approved plant species and affiliated size in (DbH – diameter breast height). See comment under § 804.4 C (1).

When regulating conservation along streams, the Ordinance should specify inclusion of native vegetation (§ 312.1. A (3)). The LVPC recommends including a reference to *Riparian and Wetland Buffer Guide/Model Regulation* recommended riparian buffer widths (§ 312.2. A).

The Ordinance prohibits flashing, flickering or strobe lighting except seasonal lights between October 25 and January 10 (§507.1.E). The LVPC recommends extending the seasonal light period by a few weeks to accommodate more holidays. For instance, the Hindu holiday of Diwali can occur as early as mid-October and is celebrated by displaying lights.

The LVPC recommends limiting the Township's list of approved plant species to Pennsylvania native species (§804.4.C.1).

In § 309 – Sewage and Water Services, items number one and two are duplicate text and should be clarified.

Zoning Map

The Township's proposed zoning map includes industrial zoning districts (TD10 and TD11) concentrated in the east side of the Township close to the Route 33 interchange at Industrial Boulevard/East Lawn Road, and east of Nazareth Borough along Bath Pike (Route 248) in areas of existing development. Residential zoning districts also follow existing development patterns, primarily located northeast/east of Nazareth Borough with some lower density subdivisions in the western side of the Township.

The proposed Zoning Map aligns with the Future Land Use Plan of the Nazareth Area Multi-Municipal Comprehensive Plan, including areas of Growth, Farmland Preservation, and Centers and Corridors.

Overall, the Township's proposed Zoning Ordinance Update aligns with *FutureLV: The Regional Plan* because its application of modern land development regulation practices exemplifies "evolution and adaptability of government" (of Policy 1.4) and substantially advances several *FutureLV* goals and policies related to natural resource conservation, strategic development to accommodate growth, housing variety and high-quality community design.

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 I§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.

The LVPC has copied representatives of the Nazareth Area Multi-Municipal Comprehensive 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,



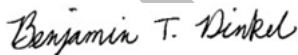
Jill Seitz
Chief Community and Regional Planner



Joey Dotta
Regional Planner



Susan Myerov
Director of Environmental Planning



Ben Dinkel
Transportation Planner

cc: Gary Asteak, Asteak Law Offices; Bradford T. Flynn, Bath Borough Manager; Belinda Roberts, Bushkill Township Manager; John Defassio, Chapman Borough Secretary; Mark Hudson, Hanover Township Manager; Lori Stauffer, Lower Nazareth Township Manager; Stephen Nowroski, Moore Township Manager; Paul Kokolus, Nazareth Borough Secretary/Treasurer; Candace Keller, Stockertown Borough Secretary/Treasurer; Mark Saginario, Tatamy Borough Manager



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Ms. Jill Seymour, Secretary
Lowhill Township
7000 Herber Road
New Tripoli, Pennsylvania 18066

**Re: Comprehensive Zoning Ordinance and Map Update
Lowhill Township
Lehigh County**

Dear Ms. Seymour:

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. 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
 - October 22, 2024 at 12:00 PM
- LVPC Full Commission Meeting
 - October 24, 2024 at 7:00 PM

The application proposes a comprehensive update to the Township's Zoning Ordinance following the recent adoption of the updated *Northern Lehigh Multi-Municipal Comprehensive Plan*. Lowhill Township is one of six Northern Lehigh communities using a single consultant to simultaneously update their zoning ordinances in a coordinated effort, a strategic way to increase land use regulatory efficiency and ensure all land uses are provided for across the six municipalities. This approach fulfills a strategy of the Northern Lehigh Plan policy to 'continue and expand collaboration between communities and infrastructure partners' (*Plan NL* Policy 6.1). The process of updating municipal zoning ordinances and maps is also a key step leading up to the creation and updates of other municipal regulatory documents such as official maps, subdivision and land development ordinances and Act 537 Sewage Management Plans.

The Township's proposed Ordinance, as specified in Section 103, is intended to promote and protect the health, safety and welfare of the community by providing for proper population density, safe transportation systems and provisions for community amenities and sanitation while preventing unfavorable conditions such as hazards, and to implement the Article I Section 27 of the Pennsylvania Constitution (Environmental Rights Amendment) giving Pennsylvania citizens the right to clean air and pure water and to preserve the environment's natural, historic, scenic and aesthetic values. Related updates to the Township's Zoning Map are also proposed.

The proposed Zoning Ordinance and Map align with numerous goals and policies of *FutureLV: The Regional Plan* as well as the *Northern Lehigh Multi-Municipal Comprehensive Plan*. The influence of these plans in the development of the code are apparent in the close correlation between the documents and serve to "coordinate land use decisions across municipal boundaries" (of *FutureLV* Policy 1.4).

The following comments are provided to compliment and strengthen the Township's thorough reworking of its zoning ordinance:

Ordinance Administration

The provisions included in the proposed Ordinance align with the Pennsylvania Municipalities Planning Code (MPC), Article VI that grants powers to municipalities to enact, amend and repeal zoning ordinances to regulate the use of land and structures and to implement comprehensive plans (of *FutureLV* Policy 1.4).

Including a clickable table of contents greatly improves the navigability and utility of the Draft Ordinance. The proposed table of permitted uses summarizes permitted land uses and regulations by zoning district, which increases the usability and ease of navigating the ordinance and is a best practice in regulating land uses (of *FutureLV* Policy 1.4). To further improve the use of the permitted land use table, it is recommended that a legend of the letters used be added.

Housing Attainability

The proposal allows a diverse range of housing types throughout its Zoning Districts, which serves to 'diversify the price points and types of available housing' (of *FutureLV* Policy 4.5). In particular, a variety of housing types are permitted as conditional uses in the Rural Village District, which aligns with *FutureLV* as a way of accommodating growth retaining rural character, farmland and open space while and preventing sprawl (*FutureLV* Crossroads Village Concept).

The LVPC encourages the Township consider opportunities to allow flexible residential development types such as cluster developments or conservation subdivisions, which may use a variety of dwelling types or smaller lot sizes than would be permitted in the Rural Village (RV) District in order to retain natural features or farmland on other areas of a parcel (of *FutureLV* Policy 3.1).

When considering the scale and density of development, the LVPC strongly recommends the Township ensure that proper utility and emergency services infrastructure is available to promote safe and secure community design (of *FutureLV* Policy 5.1).

The definition for Group Home is duplicated on pages 14 and 15 and should be clarified.

Economy

The proposed ordinance includes definitions for agriculture-supportive land uses that leverage the Township agricultural areas, create economic opportunities for farmers and support agriculture as essential to the regional economy (of *FutureLV* Policy 4.4). These provisions also support objectives of *Plan Northern Lehigh* which direct communities to 'encourage and promote farmers' markets and agri-manufacturers, selling local farm products in a coordinated regional value-added effort' and to strengthen the 'maker' and 'micro-manufacturing economy' (*Plan NL* Policy 1.4).

Environment

Northern Lehigh is the largest area of natural and geographic assets in Lehigh County and contains some of the Lehigh Valley's most significant environmental assets (*PlanNL* Page 15). Lowhill Township is home to State Game Lands (number 205) and portions of the Trexler Nature Preserve, as well as numerous other natural features across the Township. The Township's proposed zoning ordinance and map reflect a preference to retain and preserve natural features (of *PlanNL* Policy 3.1).

The LVPC recommends adding definitions for the specific terms that are referenced throughout the ordinance, including high-water table, invasive species, native species, stormwater, and watercourse.

To further strengthen the proposed ordinance, the LVPC recommends that woodland areas greater than 5 acres in size be included as a protected resource within the Environmental Protection Overlay Zone (Section 830.3). LVPC's Woodlands Guide/Model Regulations (2009) can be a resource to provide guidance on tree protection, removal and cutting.

The LVPC encourages the Township to include language referring to the Township's stormwater management ordinance and encourage the use of green stormwater infrastructure to capture and infiltrate runoff on site (Section 853.03). Adding this reference would support efforts to reduce the impacts of stormwater runoff (of *PlanNL* Policy 3.3).

The Supplementary Regionals article of the Proposed Ordinance (Section 917.010) requires Dark Skies compliant lighting, and the LVPC encourages the Township to include this requirement in Environmental Protection Areas (Section 853.05) as well.

It is recommended that landscape plans submitted to the Planning Commission be prepared by a licensed landscape architect (Section 853.06). The required "plant

material” should refer to native plant species. References to use of vegetation throughout the ordinance should specify ‘native’ vegetation and avoid introducing invasive or non-native species.

The LVPC recommends the Township consider golf courses as a special exception rather than a permitted use to ensure that facilities engage in sustainable landscaping practices that conserve resources and minimize pollution to nearby waterways (of *PlanNL* Policy 3.1).

Adding a requirement for logging and forestry management plans is a recommendation in *PlanNL* to conserve and protect natural lands (of *PlanNL* Policy 3.1). Creating and implementing a riparian buffer ordinance would also help protect surface and groundwater resources (*PlanNL* Policy 3.2).

Transportation

Standards in the proposed ordinance related to the transportation network serve to ‘provide a safe and well-maintained transportation infrastructure network’ (of *Plan NL* Policy 5.2).

The LVPC recommends reducing the minimum setbacks (Section 918). Requiring large setbacks increases costs of land and maintenance, and reducing setbacks by half would further support an efficient development process (of *FutureLV* Policy 1.4). A reduction of setbacks by half would still allow an acceptable clear zone for the street, sunlight and air circulation.

Zoning Map

The Township’s proposed Zoning map identifies areas to be zoned as Rural Village at Route 100 and east along Kernsville Road, areas to be zoned Rural to the south, east and west of the Rural Village District, and the remainder of the Township to the North is zoned Rural Conservation. The proposed zoning map aligns with the General Land Use Plan of *Plan Northern Lehigh*, which identifies the area to be zoned Rural Village District as a Preservation Buffer where small-scale, community-supportive and contextually appropriate development may occur, and the remainder of the Township is either identified for exurban land use where very little development should occur, or for preservation.

Much of the Township also falls within the Environmental Protection Overlay, as the Township contains many areas of sensitive natural features such as waterways, woodlands, steep slopes that are extremely susceptible to the impacts of development. The State Game Lands located within Lowhill Township are essential to the character, cultural and recreational identity of the Northern Lehigh area as discussed in *Plan Northern Lehigh*, and to the Lehigh Valley as a whole.

The Township's proposed Zoning map also includes two Regional Use Overlays, strategically located to match existing land uses and available infrastructure with the uses permitted in the Overlays.

Overall, the process by which Lowhill Township and the five other Northern Lehigh Communities have negotiated land uses and coordinated the development of their zoning ordinances is a best practice for efficient development and land use management practices that are responsive to regional needs. The Township's proposed Zoning Ordinance and Map directly support the achievement of the Township's goals as outlined in the *Northern Lehigh Multi-Municipal Comprehensive Plan*. The LVPC continues to be available as a partner and resource to support the community achieving their goals.

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 I§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.

The LVPC has copied representatives of the *Northern Lehigh Multi-Municipal Comprehensive Plan* to '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.

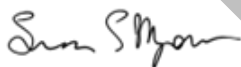
Sincerely,



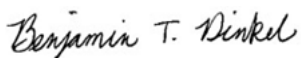
Jill Seitz
Chief Community and Regional Planner



Joey Dotta
Regional Planner



Susan Myerov
Director of Environmental Planning



Brian Hite
Transportation Planner

cc: Tammy White, Lynn Township Supervisor; Janice Meyers, Heidelberg Township Administrator; Brian Carl, Weisenberg Township Manager; Dan Stevens, Slatington Borough Manager; Wade Marlatt, Washington Township Manager; Carolyn Yagle, Environmental Planning & Design, Project Consultant

DRAFT



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October XX, 2024

Ms. Jill Seymour, Secretary
Lowhill Township
7000 Herber Road
New Tripoli, Pennsylvania 18066

**Re: Official Map
Lowhill Township
Lehigh County**

Dear Ms. Seymour:

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. 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
 - October 22, 2024 at 12:00 PM
- LVPC Full Commission Meeting
 - October 24, 2024 at 7:00 PM

The application proposes to establish the Lowhill Township Official Map. Official Maps are implementation tools that support the community's vision outlined in the comprehensive plan by identifying locations of existing and planned public lands and facilities such as transportation infrastructure, parks and trails, and open space. An official map expresses a municipality's interest in acquiring lands for public purposes sometime in the future, and the creation of the map serves to notify the public of this interest. The LVPC encourages municipalities to adopt official maps as a way of fulfilling the intent of *FutureLV: The Regional Plan* to coordinate efficient development processes (Policy 1.4), and to provide an avenue for a municipality to promote its fiscal health and sustainability (of Policy 4.6). The creation of an Official Map is also a key

recommendation of the Northern Lehigh Multi-Municipal Comprehensive Plan (*Plan NL* Policy 2.3) and supports the future update of municipal regulatory documents such as Subdivision and Land Development Ordinances and Act 537 Sewage Management Plans.

The Township's Draft Official Map identifies Township, County and State-owned lands and includes State-Owned Game Lands. The Draft Official Map identifies community amenities including places of worship and bodies of water, which serves to preserve recreational, cultural, historical and scenic assets (of *FutureLV: The Regional Plan*, Policy 3.1, 4.2 and 5.4 and *Plan NL* Policies 3.4 and 4.1).

The LVPC recommends the Township consider incorporating the following additional items to build upon the Draft Official Map:

- The LVPC recommends including symbology for a trail/path along Bausch Road to the northwest, Route 100 from the north connecting south to Bausch Road, and continuing east along Sell Road, Warden Road, Spooners Road and Scheirers Road towards Mill Creek Road. This roadway is identified as a Conceptual Trail connecting throughout the Northern Lehigh area (*Plan NL* Parks, Recreation, Open Space and Scenic Plan).
- The LVPC encourages the Township to identify transportation improvement projects that can be submitted to the Lehigh Valley Transportation Study for inclusion in the Long-Range Transportation Plan (LRTP) to support use of transportation funds to maximize available financial resources and support the fiscal health and sustainability of the Township (of *FutureLV: The Regional Plan*, Policy 2.6 and 4.6 and *Plan NL* Policy 5.2). For example, Route 100 Betterment Project is currently featured in the LRTP as an unmet need.
- Identifying preserved farmland areas on the map can help 'maintain rural character and provide open space' (*FutureLV: The Regional Plan*, Policy 3.3).

Incorporation of these features can support the Township further in achieving its desired community vision as identified in the Northern Lehigh Multi-Municipal Comprehensive Plan.

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 I§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.

The LVPC has copied representatives of the Northern Lehigh Multi-Municipal Comprehensive 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,



Joey Dotta
Regional Planner



Jill Seitz
Chief Community and Regional Planner

cc: Tammy White, Lynn Township Supervisor; Janice Meyers, Heidelberg Township Administrator; Brian Carl, Weisenberg Township Manager; Dan Stevens, Slatington Borough Manager; Carolyn Yagle, Environmental Planning & Design, Project Consultant.