



Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

LEHIGH VALLEY PLANNING COMMISSION MEETING
Thursday, March 26, 2026, at 7:00 pm
In-Person Meeting at LVPC Conference Center
615 Waterfront Drive, Suite 201, Allentown, PA 18102

AGENDA

Roll Call

Courtesy of Floor

Chair's Report

1. Thank you 2025 LVPC Commissioners!
 - a. Rick Molchany
 - b. Lamont McClure
 - c. Tina Smith
 - d. Ken Kraft
 - e. Basel Yandem
 - f. Darlene Heller
 - g. Crystal Rose
 - h. Diane Kelly
 - i. Dennis Klusaritz
 - j. John Gallagher
 - k. Jessica Cope
 - l. Rachel Leon
 - m. Jean Versteeg
 - n. Percy Dougherty
 - o. Bob Elbich
 - p. Owen O'Neil
 - q. Scott Minnich
 - r. Ed Nelson
2. Welcome New LVPC Commissioners
 - a. Ryan Mayberry, Slatington Borough
 - b. Sharon Fehlinger-Ricker, South Whitehall Township
 - c. Bryan Cope, Alternate to the Northampton County Executive

Minutes

1. *ACTION ITEM*: Minutes and Review of Roll Call Actions of the February 26, 2026, Commission Meeting

Comprehensive Planning Committee:

1. *ACTION ITEM*: Upper Macungie Township – Land Use of Regional Significance – Eli Lilly Manufacturing Facility (JS)

2. *ACTION ITEM*: Hanover Township (LC) – Land Use of Regional Significance – LVIA Parking Garage and Taxiway Rehab (JS)
3. *ACTION ITEM*: Summary Sheet (JS, S. Melnick)
4. *INFORMATION ITEM*: PlanLV Portal – LVPC Electronic Submission Update (JS)
5. *INFORMATION ITEM*: Draft Housing Supply and Attainability Strategy (JS)
6. *INFORMATION ITEM*: Federal Compliance With Local Regulations (JS)
 - a. April 6, 2026 LVGA Webinar: Municipal Roles When The Federal Government Develops In Your Community
 - i. Register at: <https://tinyurl.com/LVGAMuni-FedRolesWebinar>

Environment Committee:

1. *ACTION ITEM*: *Environment Summary Sheet (SR)*

Environment and Transportation Committee:

1. *PRESENTATION/DISCUSSION ITEM*: Lehigh Valley Trail Connection Strategy (SM)

Old Business:

1. *INFORMATION ITEM*: Update of March General Assembly (MA, JS, BB)
2. *INFORMATION ITEM*: FutureLV: The Regional Plan Update (BB, HM)

New Business:

1. *INFORMATION ITEM*: Lehigh Valley Government Academy
 - a. PA Municipal Planning Education Institute (PMPEI)
 - i. Community Planning: April 7, 14, and 21; 5:30 pm to 9 pm
 - ii. Subdivision and Land Development: May 6, 13, and 20; 5:30 pm to 9 pm
 - iii. Register at www.lvpc.org/lvga
 - b. Local Technical Assistance Program Classes – in-person at the LVPC
 - i. April 7: Public Works Safety, 8 am to noon
 - ii. April 28: Asset Management, 8 am to noon
 1. Anyone can register at www.gis.penndot.gov/LTAP or by contacting Hannah Milagio at hmilagio@lvpc.org or 610-264-4544

Executive Director’s Report:

1. *INFORMATION ITEM*: Annual Report Presentations (BB)

Monthly Reports:

1. *INFORMATION ITEMS*:
 - a. February 2026 Subdivision, Land Development, Stormwater and Municipal Ordinances/Plans Report (JW)
 - b. Highway Performance Monitoring System - Monthly Traffic Count Report (SW)

Communications and Engagement

1. *PACKET ITEM*: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1
 - a. Air Date: March 2: “A Year in Local Development With LVPC Chief Regional and Community Planner Jill Seitz.”

- b. Next show – 6:30 pm, April 6, 2026
- 2. *PACKET ITEM: GRANTS*
 - a. PA Department of Environmental Protection (DEP): Alternative Fuels Incentive (AFI) Program
 - o April 1, 2026, 12:00 PM – First acceptance period ends
 - o October 7, 2026, 12:00 PM – Second acceptance period ends
 - b. PA Department of Conservation and Natural Resources (DCNR): Community Conservation Partnerships Program (C2P2)
 - o April 30, 2026, 4 PM – Application deadline
 - c. PA Department of Community and Economic Development (DCED): Multimodal Transportation Fund
 - o March 1, 2026 – Application opens
 - o July 31, 2026 – Application closes at close of business

Next Lehigh Valley Planning Commission Meeting:

Thursday, April 23, 2026, at 7:00 pm
Virtual Meeting

The LVPC/LVTS website, www.lvpc.org, may be translated into multiple languages. Publications and other public documents can be made available in non-English languages and alternative formats, if requested.



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LEHIGH VALLEY PLANNING COMMISSION Minutes from the Thursday, February 26, 2026, Meeting

The LVPC held a public meeting on Thursday, February 26, 2026. The meeting was advertised in the Lehigh Valley Press on January 7th, 2026.

LVPC Chair Tori Morgan chaired the meeting.

Mr. Jacob Weinberg took Roll Call.

Members in Attendance:

Lehigh County

Craig Beavers, Michael Drabenstott, Gary Fedorcha, Sunny Ghai, Philip Ginder, Steven Glickman, Kent Herman, John Inglis, Christina 'Tori' Morgan, Santo Napoli, Stephen Repasch, and Kevin Schmidt.

Northampton County

Christopher Amato, Jo Daniels, Charles Elliot, Cathy Fletcher, Anita Erdos Forrester, Judy Haldeman, Tung-To Lam, Jack McGorry, Steve Melnick, Armando Mortiz-Chapelliquen, Eric Shamis, Dean Turner, and Brett Webber.

Members Absent:

Lehigh County

Phillips Armstrong, Ron Beitler, Jennifer Gomez, Samantha Pearson, Stephen Repasch, Kevin Schmidt, Josh Siegel and Matthew Tuerk.

Northampton County

Justin Amann, Andrew Elliott, Carl Manges, Salvatore Panto, Jr., J. William Reynolds, Tina Smith, Jeff Warren and Tara Zrinski.

Staff Present: Becky A. Bradley, Jillian Seitz, Susan Myerov, Corinne Ruggiero, Beth Ritter-Guth, Steven Weber, Mary Grace Collins, Jacob Weinberg and Michele Anfuso.

Public Present: Matt Balikian, Marven Miltenberger, Steve Root, Y.S., Matt Dempsey, Richard Jessop, Patrick.

COURTESY OF THE FLOOR

Chair Morgan announced and welcomed new Commissioners appointed by Northampton County and Lehigh County Executives in partnership with Northampton County Council, Lehigh County Commissioners and Bethlehem City Council. Welcomed to the Commission were: Justin Amann, from Bethlehem City Council to the shared Easton/Bethlehem City Council seat. Local elected official members who joined the Commission include Jo Daniels, from Bethlehem City Council, Tung-To Lam, from Palmer Township Supervisors and Dean Turner from Forks

Township Supervisors. New citizen members include Craig Beavers from Allentown, Gary Fedorcha from Slatington, Anita Erdos Forrester from Palmer Township, Eric Shamis and Brett Webber, both from Easton. Samantha Pearson was also welcomed to the Commission as the alternate member for Lehigh County Executive Josh Siegel.

CHAIR'S REPORT

Chair Morgan announced that at the upcoming March 26th LVPC Full Commission meeting, which will be held in-person, the Commission will recognize Commissioners who recently cycled off the LVPC. Former Commissioners will be invited to participate, and it will offer time for newer and longer-serving members to meet and get to know one another while honoring the contributions of those whose terms have ended. Chair Morgan also announced the upcoming Annual Commissioner's Retreat, which is scheduled for Wednesday, April 8th from 6-8PM, in person at the LVPC. All Commissioners are expected to attend. Chair Morgan mentioned that there was a three-part survey sent to all Commissioners requesting updated contact information, committee selections and availability for the LVPC and Lehigh Valley Transportation Study Working Group to update the bi-county comprehensive plan and metropolitan transportation plan, *FutureLV*. The survey was due Monday, March 2nd. Chair Morgan also notified Commissioners to complete the required Statement of Financial Interests form. The PA Ethics Act requires all public officials and employees to file an annual Statement of Financial Interest form. LVPC Commissioners are required to file a digital or paper copy with the LVPC by May 1st.

MINUTES

Chair Morgan asked for a motion to approve the Thursday, January 22, 2026, LVPC meeting minutes. Commissioner Repasch made a motion to approve the minutes and Commissioner Glickman seconded the motion.

Chair Morgan asked for any comments or questions. There were none. The motion passed.

COMPREHENSIVE PLANNING COMMITTEE

ACTION ITEM: Midway Manor Elementary School Modular Building

Ms. Collins presented the staff review of the proposed demolition of an existing 1,600-square-foot, two-classroom modular building and an existing maintenance building. Ms. Collins made note that the existing maintenance building is currently used by the Midway Manor Community Association as a concession stand. A new 9,856-square-foot, ten-classroom modular building will be constructed at 1103 N Tacoma Street. Ms. Collins summarized the discussion and letter amendment decided upon at the February 24, 2026 LVPC Comprehensive Planning Committee meeting.

Commissioner Haldeman made the motion to accept the staff review and Commissioner Amato seconded the motion. Chair Morgan asked for any comments or questions. There were none.

Chair Morgan called for affirmative votes to accept the staff review. Commissioner Beavers abstained. The motion passed.

ACTION ITEM: Lehigh University East Hill Residence Hall

Ms. Collins presented the staff review of the proposed construction of a new residence hall on the Asa Packer Campus of Lehigh University that will contain 265 dwelling units to house first-year students. Ms. Collins noted additional features on the site such as a green roof for the

building, pedestrian improvements, and the removal of existing street parking to convert a section of University Drive to two-way circulation.

Commissioner McGorry made the motion to accept the staff review and Commissioner Amato seconded the motion. Chair Morgan asked for any comments or questions.

Commissioner Daniels asked if the residence hall was going to be on campus and where on campus will they be located. Ms. Collins stated that the proposed residence hall was going to be located on campus, on University Drive, amongst existing student residence halls.

Chair Morgan called for affirmative votes to accept the staff comments. The motion passed.

ACTION ITEM: Comprehensive Planning Committee Summary Sheet

Comprehensive Planning Committee Chair Melnick briefed the Commission on the Comprehensive Committee Summary Sheet that featured a curative amendment in Palmer Township, and three zoning ordinance amendments – one in Bethlehem Township, one in Lower Saucon Township and one in Palmer Township.

Commissioner Glickman made the motion to accept the summary sheet and Commissioner Schmidt seconded the motion. Chair Morgan asked for any comments or questions. There were none.

Chair Morgan called for affirmative votes to accept the staff comments. The motion passed.

INFORMATION ITEM: Draft Housing Supply and Attainability Strategy Project Update

Ms. Seitz presented a project update for the Lehigh Valley Housing Supply and Attainability Strategy document. Ms. Seitz stated that the document was currently in the design process and a draft is to be shared with Commissioners at the March Comprehensive Planning Committee meeting. Ms. Seitz also stated there will be a comment period for Commissioners, County representatives and local government representatives to review the document before anticipated adoption at the April Full Commission meeting. Ms. Seitz also announced there will be a presentation on the Housing Supply and Attainability Strategy at the upcoming LVPC General Assembly on March 10, and alongside the LVPC staff will be a representative from the State Department of Community and Economic Development attending to present the State's Housing Plan.

Chair Morgan asked for any comments or questions. There were none.

INFORMATION ITEM: Commonwealth of Pennsylvania Housing Action Plan

Ms. Seitz announced the release of the Commonwealth of Pennsylvania's Housing Action Plan, which is the state's first coordinated, cross-agency framework focused on housing supply and attainability. Ms. Seitz noted the significance of this effort as it reinforces that housing supply is a top-tier policy priority at the state level and how much of what the state outlines in the plan mirrors the work this Commission has already undertaken through the Lehigh Valley Housing Supply and Attainability Strategy.

Chair Morgan asked for any comments or questions.

Commissioners discussed opportunities to provide additional guidance on emerging land uses and hosted a brief discussion on the Lehigh County Industrial Land Use Guide. Ms. Bradley noted that later in the presentation this item will be covered.

ENVIRONMENT COMMITTEE

Environment Committee Chair Repasch briefed the Commission that the Environment Committee did not meet this month. Commissioner Repasch also provided an update to Commissioners about the Lehigh Valley Trail Connection Strategy document and how it is in for design with the communications and design team staff and will be shared at the upcoming March Environment Committee and Full Commission meetings.

Chair Morgan asked for any comments or questions. There were none.

TRANSPORTATION COMMITTEE

Transportation Committee Chair Schmidt briefed the Commission that the Transportation Committee did not meet this month. Commissioner Schmidt also reported that the LVPC staff are currently wrapping up the Congestion Management Plan for the LVTS in the upcoming months. A comprehensive update on the Congestion Management Plan will be discussed at the March Transportation Committee meeting.

Chair Morgan asked for any comments or questions. There were none.

OLD BUSINESS:

INFORMATION ITEM: Employment and Population Projections Report

Ms. Ritter-Guth notified the Commission that the full Lehigh Valley Employment and Population Projections report is live on the LVPC website. The Lehigh Valley Employment and Population Projections report provides details and identified trends about all 62 municipalities in the region. Ms. Ritter-Guth noted that there would be more information about this effort during the Annual Report presentation as well as more specific details that will be discussed as part of the *FutureLV: The Regional Plan* update.

NEW BUSINESS:

ANNUAL REPORT

Ms. Bradley gave a brief overview of the responsibilities and details of the 2025 LVPC Annual Report. Ms. Bradley also notified the Commissioners that LVPC staff will be making county specific presentations to Northampton County Council on March 5th at 4:30PM and Lehigh County Commissioners on March 11th at 7:30PM. Ms. Ritter-Guth presented on the Employment and Population report and highlighted specific employment and population projection data. Ms. Ruggiero and Ms. Seitz presented 2025 BuildLV data, sharing review data with analysis of general trends and expectations surrounding development in the region in 2025. Ms. Seitz also presented on Housing Engagement at the National, State and Local Levels that occurred in 2025 which included the National Association of Regional Councils Housing Dashboard Award, hosting the Governors Housing Round Table which informed the State Housing Action Plan and the Lehigh Valley Housing Supply and Attainability Strategy and its engagement. Mr. Weinberg presented on multi-municipal planning efforts. Ms. Collins presented non-residential development data and trends in 2025. Ms. Collins also presented on the Lehigh County Industrial Land Use Guide. Ms. Myerov shared environmental initiatives which included the Pathway to a Resilient Greater Lehigh Valley and the Lehigh Valley Watershed Assessment and Act 167 Stormwater Ordinance Update. Mr. Weber presented on transportation initiatives which included plans and programs such as the Electric Vehicle Infrastructure Program, the Lehigh

Valley Trail Connection Strategy, Walk Audit Implementation tool, as well as allocating funding to 14 projects in the region through two federal funding initiatives: Carbon Reduction Program and Transportation Alternatives Set-Aside. Other transportation initiatives from 2025 that were discussed in the report include the Transportation Investment Project Selection Process, Roadway Functional Classification Update, “What To Do with 22” Project and the Annual Listing of Obligated Projects. Ms. Ritter-Guth presented several community training courses that were offered in 2025, which included The Pennsylvania Municipal Planning Education Institute classes, the Local Technical Assistance Program trainings as well as Lehigh Valley General Assembly. Community Action initiatives such as workshops, expert panels, legislative testimonies, classroom lectures and keynote addresses were also presented. Media outreach and a preview of what is to come in 2026 were also presented.

Chair Morgan asked for any comments or questions. There were none.

PRESENTATION ITEM: Lehigh Valley General Assembly

Ms. Bradley gave an overview of the Lehigh Valley General Assembly meetings, which are a bi-annual gathering of elected and appointed officials from all municipal governments, school districts, legislative districts and water/sewer authorities in Lehigh and Northampton Counties. Meeting information and the agenda of the upcoming Lehigh Valley General Assembly meeting being held on March 10 at 7pm were also shared.

Chair Morgan asked for any comments or questions. There were none.

PRESENTATION ITEM: Lehigh Valley Government Academy

The Lehigh Valley Government Academy was discussed to highlight upcoming training opportunities. The two courses scheduled in 2026 so far included Community Planning to be held on April 7, 14 and 21 from 5:30-9pm and Subdivision and Land Development to be held on May 6, 13, and 20 from 5:30-9pm.

Chair Morgan asked for any comments or questions. There were none.

EXECUTIVE DIRECTOR’S REPORT:

Ms. Bradley presented on Recent Activities which included being quoted in the Wall Street Journal in the article “Pennsylvania Wins Bid for Eli Lilly Weight-Loss Drug Factory”, Business Matters – Greater Lehigh Valley Chamber of Commerce and WFMZ Episode on Planning for the Future of the Lehigh Valley, Upper Macungie/Weisenberg Township Associated Investments, Economic Impact Analysis of the Lehigh County Authority Industrial Pre-Treatment Plant, the American Society of Highway Engineers Regional Chapter Presentation and the Lehigh County Industrial Land Use Guide Community Workshops. Ms. Bradley also noted on-going direct municipal activities such as Lower Saucon Community Impact Assessment Project, Easton Planning Commission Training, Multi-Municipal Comprehensive Plans Support, River Central Zoning and Official Maps, Slate Belt Zoning and Official Maps and Potential New Planning Group.

MONTHLY REPORTS

Chair Morgan notified the Commission that monthly reports are featured in each Commissioner’s packet. Chair Morgan asked for any comments or questions. There were none.

COMMUNICATIONS AND PUBLIC ENGAGEMENT:

Chair Morgan notified the Commission that items for communications and public engagement are featured in the meeting packet. Chair Morgan asked for any comments or questions. There were none.

ADJOURNMENT:

Chair Morgan stated that the next LVPC meeting will be on Thursday, March 26th at 7 pm. Chair Morgan then asked if there was a motion to adjourn the meeting and Commissioner Fedorcha made a motion to adjourn, and Commissioner Ginder seconded the motion. The meeting was adjourned.

Submitted by:

Becky Bradley, AICP, Executive Director and Corinne Ruggiero, Environmental Planner



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March XX, 2026

Ms. Meredith Keller, Director of Community Development
Upper Macungie Township
8330 Schantz Road
Breinigsville, PA 18031

**Re: Eli Lilly Manufacturing Facility – Land Use of Regional Significance
Upper Macungie Township
Lehigh County**

Dear Ms. Keller,

The project proposes a manufacturing complex totaling approximately 1.5 million square feet of gross floor area (797,432 square foot building area) on approximately 150 acres of land at 8810 Main Street, Fogelsville, PA 18051, north of Interstate 78 (parcel number 545630143828. The project site is currently used for agriculture. This project is considered a Land Use of Regional Significance (LURS) in the Major Industrial Park land use category of *FutureLV: The Regional Plan*.

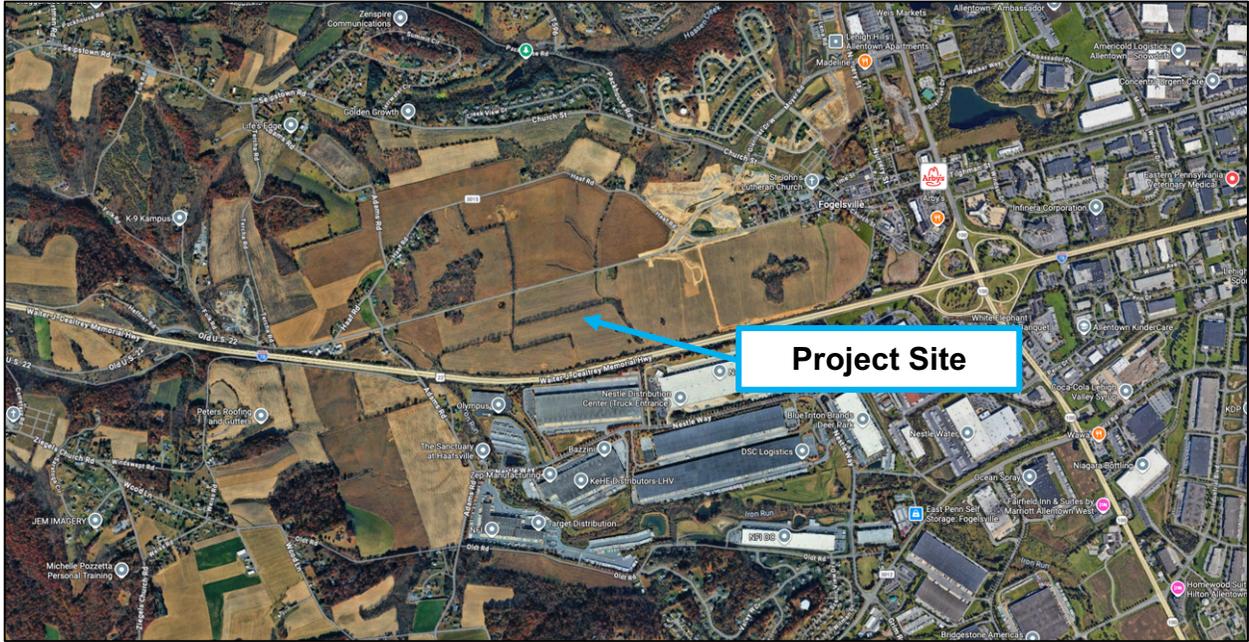
The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting:</p> <p>March 24, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting:</p> <p>March 26, 2026, at 7:00 PM (In-Person or Virtual) https://lvpc.org/lvpc-meetings</p>
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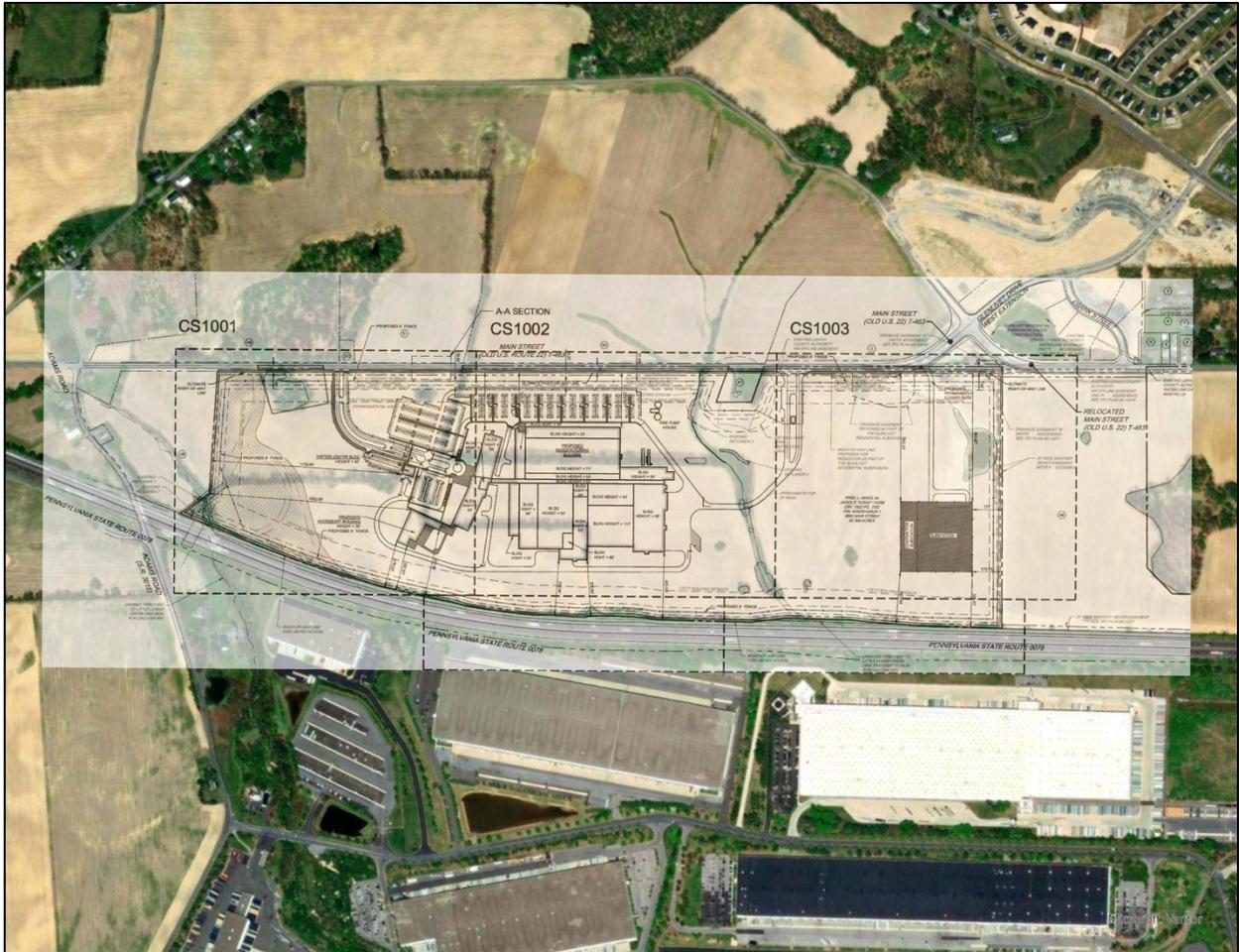
BACKGROUND

The project site is located just west of Fogelsville. South of the site across Interstate 78 is an existing industrial park, and agricultural lands are to the southwest, west and north.

Land uses of regional scale and impact must be coordinated with utility partners and agencies that have a regulatory role or vested interest in the public health, safety and welfare. For this reason, LVPC has coordinated with partner agencies as part of this review.



Google Aerial Imagery

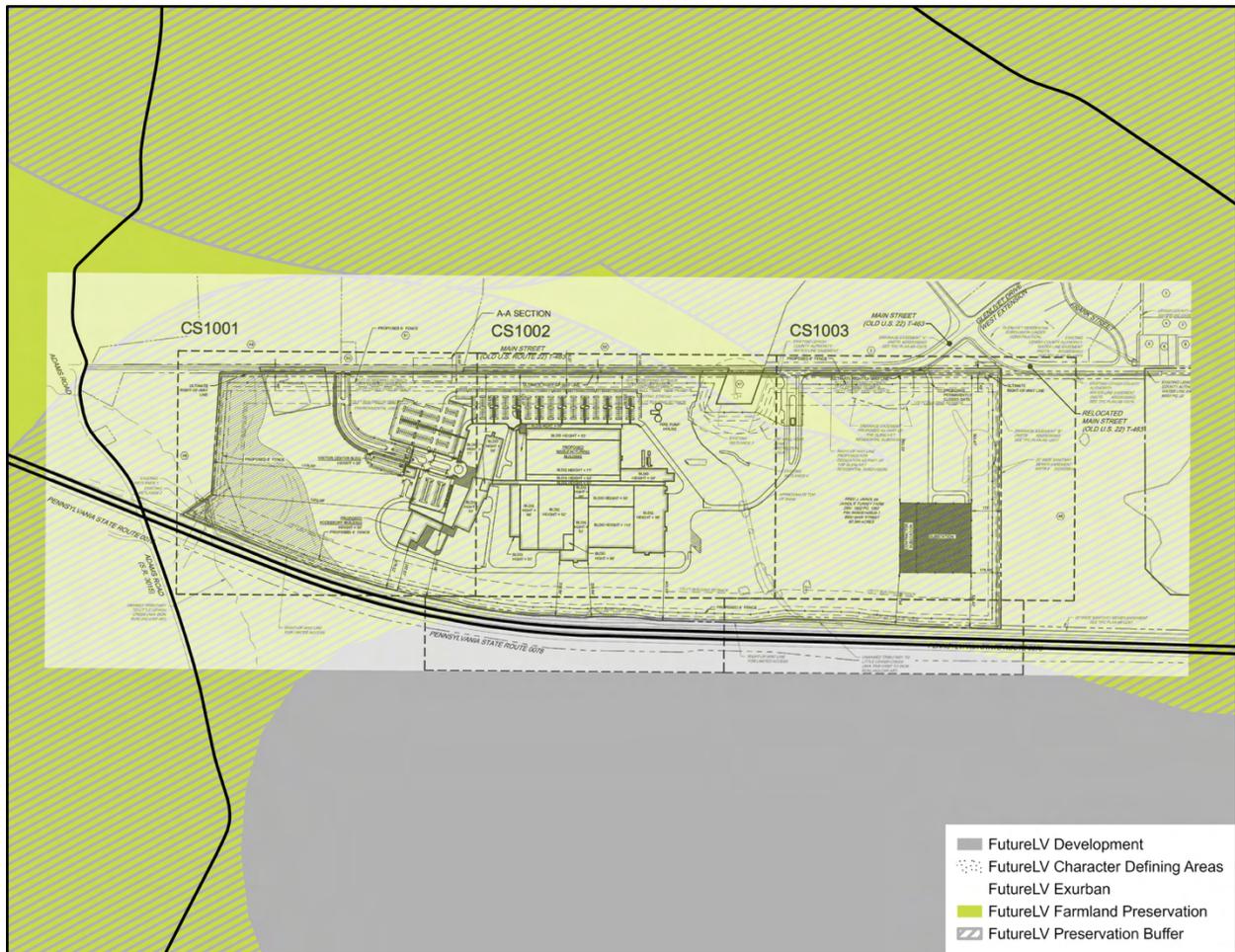


Overall Site Plan Overlaid on Aerial Imagery

The proposed Eli Lilly facility represents a major economic investment in the Lehigh Valley and the Commonwealth of Pennsylvania. According to recent reporting, the project represents an estimated \$3.5 billion investment and is expected to create approximately 850 permanent jobs and approximately 2,000 construction jobs as the facility is developed. This investment reinforces the Lehigh Valley’s long-standing role as a manufacturing center and ‘enhances growth by rooting economic development strategies in the unique competitive advantages of the region’ (of *FutureLV* Policy 4.1). The project also aligns with broader state-level economic development efforts to attract major manufacturing investments and expand workforce training programs related to pharmaceutical manufacturing and advanced production technologies (of Policy 4.2).

SITE SUITABILITY AND LAND USE

The proposal is located within the Preservation Buffer of the General Land Use Plan, which are areas where agricultural preservation is preferred, but factors may be present and capable of accommodating additional development. These factors are present at the project site, including access to public sewer and water and proximity to major highways and roadways including Interstate 78 and Route 100. The project site is located just north of I-78, and across I-78 from the site is an existing industrial park.



Overall Site Plan Overlaid on the FutureLV General Land Use Plan

Additionally, the Township's zoning of the property as Limited Light Industrial District (LIL) facilitates industrial development at this location, and the proposed use is permitted by right, according to the Township Zoning Ordinance (Section 27-306.2.)

The project site is in an area that has seen substantial industrial investment and growth over the past 20 years, and major transportation improvements are being coordinated in the vicinity. The project serves to 'match development intensity with existing and planned infrastructure capacity' (of Policy 1.1).

TRANSPORTATION

The site's proximity to Interstate 78, a major regional and interstate freight corridor, supports improving freight movement and regional mobility (of *FutureLV* Policy 2.4). Locating large employment centers near high-capacity highways helps minimize truck traffic through local residential streets and supports efficient supply chain operations.

The Lehigh Valley Transportation Study (LVTS), in partnership with the Pennsylvania Department of Transportation (PennDOT) have worked collaboratively to widen I-78 from the Berks County line eastward towards Route 100. In addition, a new interchange, at Adams Road and I-78, supported by the LVTS, PennDOT, and Upper Macungie Township has been in planning for approximately five years. This new interchange is less than ¼ of a mile from the project site. Both the I-78 widening and Adams Road interchange projects are in the state and federal planning and funding cycles now. Construction will occur after the opening of the Eli Lilly pharmaceutical manufacturing facility, however, additional transportation infrastructure is being added that supports the Fogelsville Industrial District north and south of I-78.

A traffic impact study (TIS) was provided as part of the review submission. The trip generation numbers provided within the TIS were determined based upon data provided to the engineering consultant from the developer of the facility, though the TIS did not specify the source or validity of this data. The TIS also includes specific forecasts for truck trips, but does not explain how those trips were calculated. During the land use of regional significance coordination meeting with regulatory partners, including the Township, it was noted that additional information is forthcoming. Should this information be received prior to action by the LVPC, any changes to this review will be noted.

Until revised transportation impact information is received, the following comments remain: the applicant should address how it was determined that only 90 trucks are anticipated to be generated per day, according to the TIS.

LVPC staff used the Institute of Transportation Engineers (ITE) Trip Generation Manual, ITE Land Use Code 140 (Manufacturing) to estimate the number of new trips generated by the project. The ITE Trip Generation numbers estimate fewer trips peak hour than those provided in the TIS. The TIS trip estimates are based on the expected entry and exit patterns for two 12-hour shifts for factory shift workers (232 for the 6 AM to 6 PM shift and 232 for the 6 PM to 6 AM shift).

A comparison between both calculations are shown below:

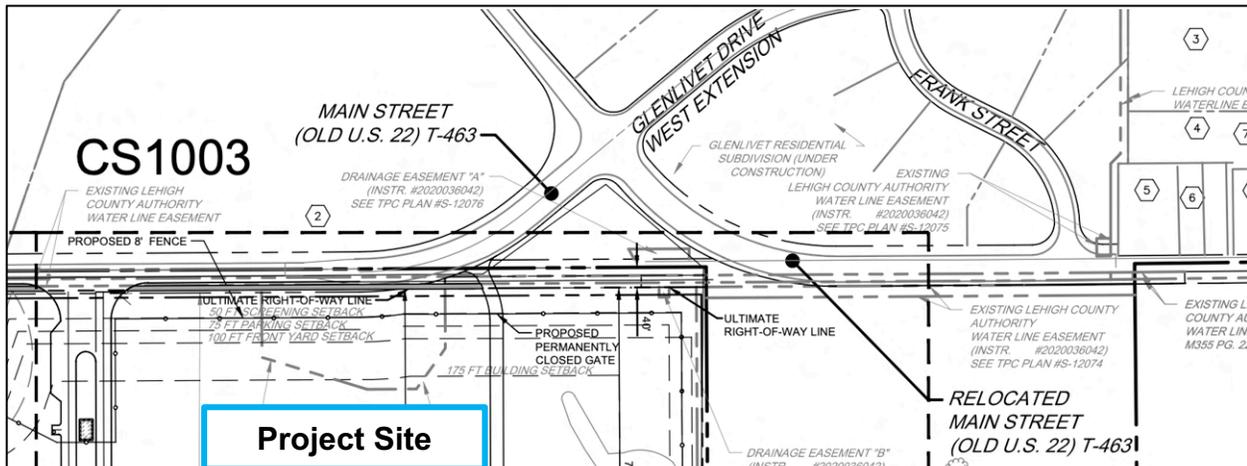
	Trip Generation Calculations based on ITE (LU Code 140)*	Trip Generation Calculations provided by applicant:
Average Daily Weekday Trips	New Car Trips: 2,270 New Truck Trips: 289 Total New Trips: 2,559	New Car Trips: 2,221 New Truck Trips: 90 Total New Trips: 2,311
AM Peak	New Truck Trips: 26 Total New Trips: 222	New Truck Trips: 32 Total New Trips: 418
PM Peak	New Truck Trips: 17 Total New Trips: 221	New Truck Trips: 32 Total New Trips: 650

***ITE Definition of Manufacturing:** A manufacturing facility is an area where the primary activity is the conversion of raw materials or parts into finished products. The size and type of activity may vary substantially from one facility to another. In addition to the actual production of goods, a manufacturing facility typically has an office and may provide space for warehouse, research, and associated functions.

Access to the site is planned to be provided via two driveways with one lane in each direction, one connected to Old U.S. Route 22, and a one proposed gated access drive to the onsite sub-station also connected to Old U.S. Route 22.

One of the access driveways will be used primarily to serve trucks to and from the site while the other full access drive will primarily serve passenger vehicles to and from the site.

Any traffic traveling to and from the site will most likely be traveling East from the site to Route 100, which may take them through Main Street in Fogelsville. Upper Macungie Township has asked the developer to make attempts to deter the employee and truck trips from traveling on Main Street. Although the relocation of Main Street to form a four-way intersection with Glenlivet Drive will help direct traffic north of Fogelsville, wayfinding signage should be implemented both on-site and along nearby roadways to clearly direct trucks, employees, and visitors to the appropriate entrances. This may help reduce confusion and unnecessary circulation on surrounding roadways and discourage trucks from traveling through sensitive residential or village areas such as Main Street in Fogelsville or the Glenlivet Residential Subdivision under construction (of Policies 2.4 and 5.1).



Enlarged Site Plan Showing Glenlivet Drive Extension / Relocated Main Street

Impacts of a large employer expand beyond the development itself. Conversations are on-going between the Township, end user, PennDOT, LVPC and many other land development partners. One of the items under consideration is the acknowledgement that even with the new interchange at Adams Road and I-78 open in the future, Old U.S. Route 22, through Fogelsville and the Glenlivet Drive routes both lead to services that will be utilized by employees, suppliers and visitors to the Eli Lilly facility. Service, including grocery, healthcare, fitness centers, restaurants and gas stations, among other businesses are close by. It is expected that traffic patterns will evolve and change with this new, large employer, especially along Route 100. Maintenance and refinement of the transportation system nearby will become an important need as the manufacturing business begins. Monitoring traffic signal timing, turning movements, infrastructure maintenance and even transit needs by the Township, in partnership with PennDOT, LANTA and LVPC, is necessary.

The plans include electric vehicle charging spots within the visitor parking area, and encourages the applicant to ensure alternative fueling spots are provided within the employee parking lots and for tractor trailers (of Policies 2.2, 3.2 and 3.4).

Sidewalks are substantially included throughout the project site, including along most of the Old U.S. Route 22 property frontage, which supports pedestrian safety and reducing fatalities towards zero (of Policies 5.1 and 5.3). The applicant should consider extending the sidewalk fully along the property frontage to the east to support the potential for future connectivity with other properties. The external walkway runs along the access driveway, and crosswalk markings and signage are provided which enhance safety for employees walking within the site (Policies 5.1 and 5.3). The sidewalks are shown along the frontage of the proposed Industrial Drive without any Truncated Dome Pattern for Americans with Disabilities Act (ADA) Detectable Warning Surfaces (ADW). These are needed for compliance with the ADA infrastructure requirement and should be constructed to meet ADA Federal Guidelines (of Policy 5.3).

Bicycle racks at the building should be provided where appropriate near building entrances to encourage alternative transportation options and offer a seamless network for employees to safely ride to work. Given the continued growth of employment centers in the area, the site design should preserve opportunities for future pedestrian and bicycle connections, such as by providing stubs or connection points at the edge of the property (of Policies 2.2, 2.3, and 5.3).

The Lehigh and Northampton Transportation Authority (LANTA) provides fixed-route public transportation in the vicinity east and south of the project site, with bus stops on Tilghman Street to the east, Glenlivet Drive and Nursery Street to the northeast, and Nestle Way south of the project site on the other side of I-78. While LANTA does not currently serve the frontage of the project site on Main Street, near-term plans call for an extension of service via Old US-22 (Main Street), Adams Road, and Nestle Way, pending coordination with the proposed Adams Road Interchange. LANTA currently does not plan to enter and serve the project site, however the proposed site plans include a comprehensive pedestrian network that allows pedestrians and transit riders to safely access the facility main entrances.

To support anticipated future transit service, the applicant should include a new bus stop along the property frontage on Main Street, nearside of the new intersection alignment with Glenlivet Drive and Haaf Road. The new bus stop should include an accessible five-foot by eight-foot concrete bus stop landing pad, and the LVPC encourages the inclusion of rider-supportive necessities such as benches, a shelter, lighting, and trash receptacles (of Policy 2.3). Given the expected workforce associated with the development, the applicant should consider

implementing Transportation Demand Management (TDM) strategies to reduce single-occupancy vehicle trips. These strategies could include designated carpool and vanpool parking spaces near building entrances.

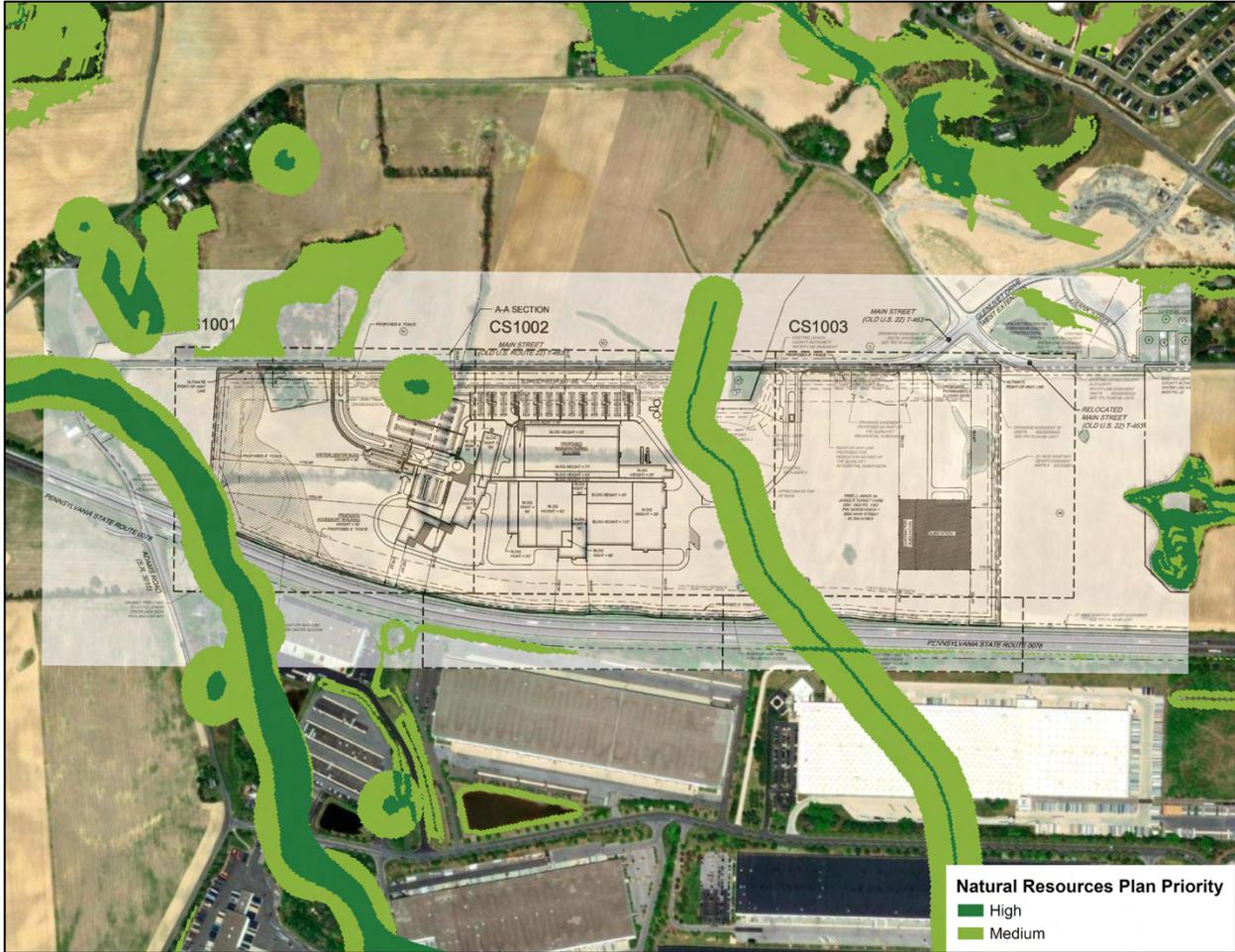
A connected tractor-trailer requires 70 feet of parking to safely park and allows movement of other vehicles around the parked vehicle. The sizing of the trailer parking spaces should be specified in the site plan. The loading zones and dock doors are not marked on the plan and should be to properly show truck turning and interaction with the other vehicles on the site.

There are some dedicated truck parking spaces, though seemingly a deficient amount for the anticipated number of trucks accessing the site, but it is not clear if they are long-term or to address hours of compliance. Overnight or long-term parking spaces are a critical safety element for drivers and trucks as well as the community to provide safe and designated parking locations for drivers that may be not allowed to drive after working their allotted “hours of service” to legally be allowed to drive. Truck parking is a national problem and freight-centric facilities such as this project can accommodate a limited number of parking spaces to help the truck parking shortage. It is strongly recommended that several parking spaces be provided for tractor-trailers, to allow drivers to rest and reset their hours-of-service timeframes. (Policy 2.4) Consideration should also be given to providing adequate truck stacking space at the gated access point to prevent trucks waiting for entry from queuing back onto Old U.S. Route 22. Any security checkpoint or gate operation should be designed to accommodate peak truck arrival periods without impacting traffic operations on the adjacent roadway (of Policy 5.1).

There are no shown snow removal provisions for compliance with the Pennsylvania Snow Removal law requiring vehicles to remove snow and ice from the tops of vehicles as to not cause road hazards and unsafe conditions. Snow removal equipment to provide compliance with the law for drivers is becoming commonplace for freight-centric facilities (of Policies 2.2 and 5.1).

ENVIRONMENT

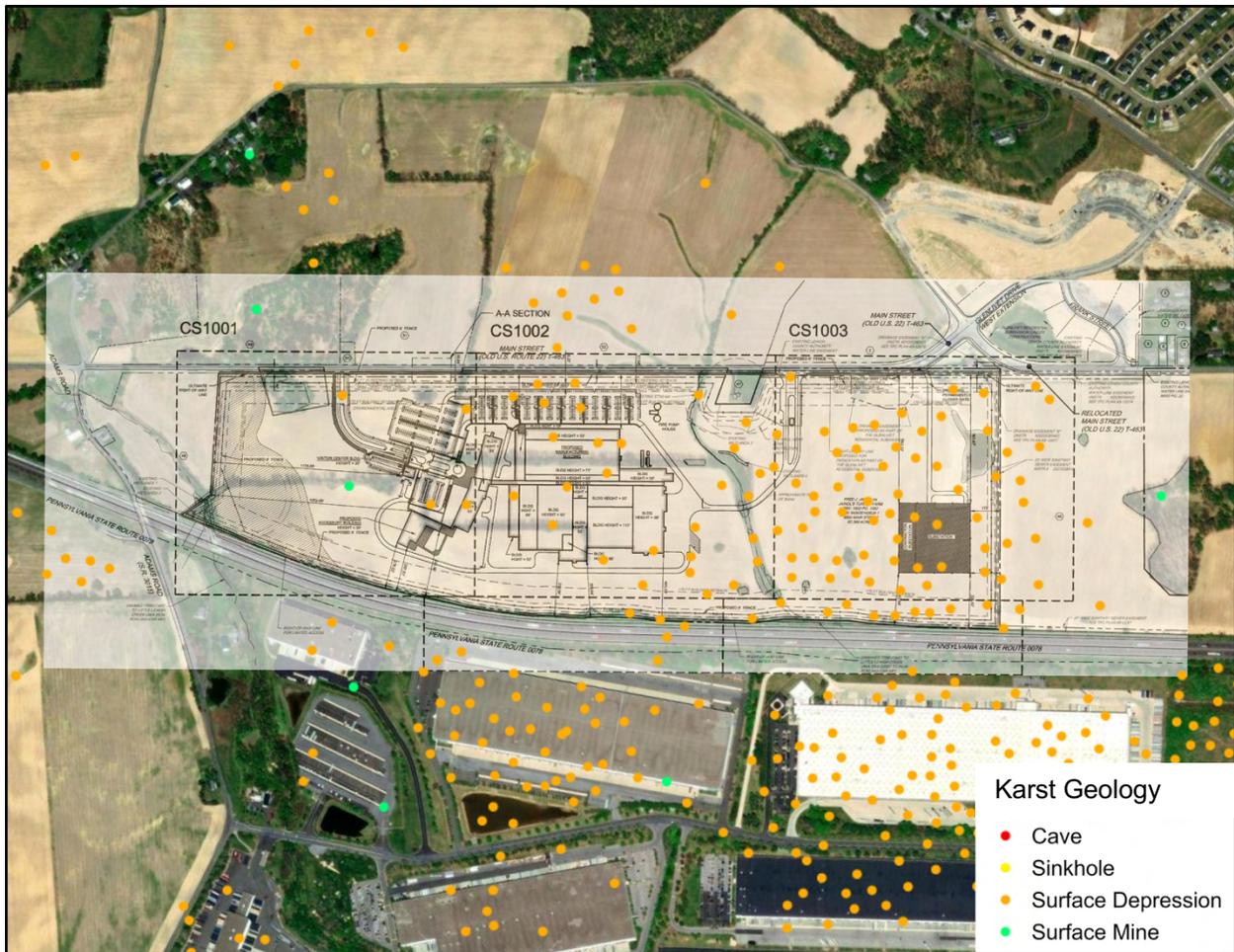
The project site contains existing natural features, including two tributaries to the Little Lehigh Creek, and several wetland and woodland areas. Site plans largely avoid disturbing these natural features, which serves to ‘preserve natural resources in the land development process’ (of Policy 3.1). Tributaries to the Little Lehigh Creek must include a minimum 150-foot riparian buffer as the creek is designated by the Pennsylvania Department of Environmental Protection as a High Quality waters.



Overall Site Plan Overlaid on the FutureLV Natural Resources Plan

LVPC notes the presence of a Lehigh County Authority Groundwater Well on the northeast corner of the project site, adjacent to the Main Street parking entrance. The applicant must ensure that the Well Head Protection Zone boundaries established surrounding the site be maintained and that the proposed development will not impact this critical resource, to 'protect the quality and quantity of surface and groundwater' (of Policy 3.2).

Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karst in the form of surface depressions and a surface mine on the site. The LVPC advises the applicant to ensure proper geotechnical testing and reporting of results, prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (Policy 3.2).



Overall Site Plan Overlaid on LVPC's GIS Mapping of Karst Geology

Substantial landscaping is proposed throughout the project site, including along roadway frontage and site boundaries, throughout parking areas, and along access drives and stormwater basins, which will contribute to visual buffering, site aesthetics, and stormwater management. Additionally, most proposed landscaping species are native to Pennsylvania or the eastern United States *FutureLV* (Policy 3.4). To support the long-term sustainability of the proposed landscaping design, the LVPC recommends that all parking lot islands contain sufficient soil volume and width to support the recommend tree species noted on the landscaping plan, and that as much as possible, non-native varieties be replaced by native species (canopy trees typically require 1,000-1,200 cubic feet of soil to support healthy growth).

The LVPC encourages the applicant to consider the financial and environmental benefits of incorporating sustainable systems into facility functionality. During the partner engagement meeting held earlier this month, it was noted that the intended plan for this development includes green building and site design elements, which support the Regional Plan, and the long-term sustainability of the Township and Lehigh Valley. Sustainable utilities and systems, such as solar panels, green roofs, geothermal energy systems and greywater reuse for irrigation and plumbing, reduce overhead operational costs while also 'minimizing environmental impacts of development' (Policy 3.1), 'encourage reuse, sustainable building, site design and community design practices' and supporting 'renewable energy and diversification of sources' (of Policy 3.4).

The project site is located within the Little Lehigh 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.

The LVPC has copied appropriate representatives from adjacent municipalities to further '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



Evan Gardi
Transportation Planner

cc: Ryan Kern, Township Engineer; Rick Moore, DPR Construction, Applicant; Mike Kissinger, Pennoni Associates, Project Engineer; David M. Jandl, Record Property Owner; Stephen Nemeth, Alburtis Borough Manager; Shane Pepe, Emmaus Borough Manager; Emily Fucci, Lower Milford Township Administrator; Mike Siegel, Lowhill Township Manager; John Brown, Macungie Borough Manager; Ed Carter, Upper Milford Township Manager; Meredith Keller, Upper Macungie Township Director of Community Development; Dave Manhardt, South Whitehall Township Director of Community Development; Brian Carl, Weisenberg Township Manager; Jennifer Gomez, City of Allentown Planning Director; Kerry Rabold, Salisbury Township Planning & Zoning Officer; Liesel Gross, Lehigh County Authority Chief Executive Officer; Garrett Cook, Lehigh County Conservation District Engineer; Fadia Halma, PA DCED Lehigh Valley Regional Director; Dean Ritter, PA DEP Assistant Regional Director; Jane George, PPL Regional Affairs Director; Joseph Lookup, PPL Vice President of Transmission & Distribution Planning & Asset Management Brian Boyer, PennDot District 5; Chad Pindar, Delaware River Basin Commission Water Resource Planning Section Manager; Molly Wood, LANTA Planner/Land Use Specialist.



Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

March XX, 2026

Ms. Melissa Wehr, Manager
Hanover Township
2202 Grove Road
Allentown, PA 18109

**Re: LVIA Parking Garage – Land Use of Regional Significance
Hanover Township
Lehigh County**

Dear Ms. Wehr:

The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Airports category. The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting: March 24, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting: March 26, 2026, at 7:00 PM (In-Person or Virtual) https://lvpc.org/lvpc-meetings</p>
--	---

BACKGROUND

The application proposes to redevelop an existing parking lot at the Lehigh Valley International Airport (LVIA) into a parking garage, creating a total of 1,200 parking spaces. Additional upgrades and improvements to the existing runway are also proposed. The project is located at 3311 Airport Road (parcel number 641819088171).

SITE SUITABILITY AND LAND USE

This proposal is located in the Development area of the General Land Use Plan of *FutureLV: The Regional Plan*, and aligns with *FutureLV* by 'right-sizing transportation infrastructure projects' (of Policy 2.2) and improving infrastructure that supports existing and future LVIA operations. Improvements to infrastructure at LVIA are an important element to the sustained economic viability and mobility of the Lehigh Valley as population and employment continue to grow (of Policy 4.1).

TRANSPORTATION

Access to the project site is planned to be provided via the existing access driveways and out the existing gated driveway. The LVPC strongly encourages the applicant, Lehigh-Northampton Airport Authority (LNAA), specify the number of additional trips that the parking expansion is

estimated to generate, especially as additional flight options are expanded and offered in the future, to support the Township in managing traffic impacts in the area (of Policy 2.2). If over 150 additional trips are anticipated to be generated hourly, a Traffic Impact Study may be required by Pennsylvania Department of Transportation (PennDOT) as a requirement for projects on state-owned roads.

The existing short-term parking lot includes electric vehicle (EV) charging. The LVPC recommends including the installation of EV charging infrastructure for new short-term parking spaces, and specifying the number of spots that will support EV charging, to accommodate the rapid advancement of electric vehicles (of Policy 2.5).

The LVPC commends the inclusion of sidewalks surrounding the garage, which supports pedestrian safety and reducing fatalities towards zero (of Policies 5.1 and 5.3). The applicant should consider extending the sidewalk throughout the entire parking facility on the airport property, including crosswalks from each parking lane. Where pedestrian paths cross circulation routes, high-visibility crosswalk markings and signage should be provided to enhance safety for pedestrians walking within the site. Secured bicycle racks at the parking garage should be provided where appropriate, to encourage alternative transportation options to the airport facilities for both pedestrians and employees.

ENVIRONMENT

The project site is located within the Catasauqua Creek Watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments relative to our review of the project's stormwater management plan will be included as Attachment 1 when the letter is sent.

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,



Evan Gardi
Transportation Planner



Jillian Seitz
Chief Community and Regional Planner

cc: Audrey Anderson, Township Clerk; Kevin Chimics, Township Engineer; Ryan Meyer, LNAA Planning Director, Applicant; Christine Troxell, CDR Maguire Engineering, Project Engineer.

Project Review Summary Sheet

Comprehensive Planning Committee

Date: March 2026

Project	Municipality	Brief Statement of Purpose	LVPC Comment
Zoning Ordinance Amendment	Lowhill Township	<i>Digital Infrastructure Facilities (DIFs)</i> - Adds definitions and regulations for DIFs and establishes them as a conditional use in the Regional Use Overlay 2 Zoning District with related regulations.	<p>LVPC supports the Township’s proactive effort to address an emerging land use, which encourages an efficient development process responsive to regional needs (of Policy 1.1).</p> <p>The decommissioning and electronic waste plan support the goal of <i>FutureLV</i> to ‘enhance the long-term viability of assets’ and ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’ (of Policies 1.3 and 3.2).</p>
Zoning Ordinance Amendment	Bushkill Township	<i>Data Centers</i> - Adds definitions and regulations for Cryptocurrency Mining Facilities, Data Centers, Data Center Accessory Uses, and Solar Energy Facilities as a special exception in the General Commercial/Industrial District (GC/I).	The LVPC recommends the Township permit Data Centers in the GC/I District as a Conditional Use and supports the Township’s efforts to proactively zone for solar energy, helping to ‘reduce greenhouse gas emissions’ and ‘support renewable energy and diversification of sources’ (of Policy 3.4).
Zoning Ordinance Amendment	Washington Township (NC)	<i>Data Centers</i> - Adds definitions and regulations for “Data Storage Centers” and establishes Data Storage Centers as a special exception use in the Industrial Zoning District with related regulations.	LVPC supports the Township’s proactive effort to address an emerging land use, which aligns with <i>FutureLV</i> by guiding the location and intensity of development and encouraging an efficient development process responsive to regional needs (of Policy 1.1).



Project Review Summary Sheet

Comprehensive Planning Committee

Date: March 2026

<p>Zoning Ordinance Amendment</p>	<p>Plainfield Township</p>	<p><i>Data Centers</i> - Adds definitions and regulations for Data Centers as a conditional use in the General Commercial (GC) and Industrial Business Park (I-BP) Districts.</p>	<p>LVPC supports the Township's proactive effort to address an emerging land use, which aligns with <i>FutureLV</i> by guiding the location and intensity of development and encouraging an efficient development process responsive to regional needs (of Policy 1.1).</p>
<p>Zoning Ordinance Amendment</p>	<p>Upper Macungie Township</p>	<p><i>Automated Storage and Retrieval Systems</i> - Adds definitions and regulations for Vertical Automated Storage and Retrieval Systems (AS/RS) in the Light Industrial Park District and the Limited Light Industrial Park District.</p>	<p>Supports the goal of <i>FutureLV</i> to 'promote next generation manufacturing and technology' (of Policy 4.2) that supports rapid advancements in the way goods and services are moved.</p>
<p>Zoning Ordinance Amendment</p>	<p>Plainfield Township</p>	<p><i>Solar Energy Systems</i> – adds definitions and regulations for principal and accessory solar energy systems and establishes principle solar energy systems as permitted by special exception in the Farm and Forest District.</p>	<p>LVPC commends the townships farmland protection regulations to 'preserve farmland to maintain rural character and provide open space (of Policy 3.3). The LVPC recommends the township also permit by special exception principal solar energy systems in Solid Waste Processing and Disposal District to encourage the reuse of landfills for principle solar farms and 'support business practices that mitigate the effects of climate change' (of Policy 3.4)</p>



Project Review Summary Sheet

Comprehensive Planning Committee

Date: March 2026

<p>Zoning Ordinance Amendment</p>	<p>Washington Township (NC)</p>	<p><i>Solar Farms</i> – Adds definitions for principal solar energy systems (PSES) and outlines conditions for its use by special exception.</p>	<p>The LVPC recommends differentiating between accessory and principal solar energy system uses to further ‘support renewable energy and diversification of energy sources’ (of Policy 3.4).</p>
<p>Zoning Ordinance Amendment</p>	<p>Forks Township</p>	<p><i>Solar Farms</i> – Amends districts where solar arrays, solar farms and wind turbines are permitted, and amends the use regulations for solar farms.</p>	<p>The proposal supports effective farmland preservation techniques (of Policy 3.3) while ‘supporting renewable energy and diversification of energy sources’ (of Policy 3.4).</p>
<p>Zoning Ordinance Amendment</p>	<p>Upper Saucon Township</p>	<p><i>Planned Residential Development</i> - Adds planned residential development as a permitted use by right in the Enterprise Overlay Zoning District with related regulations on the design and governance of the use.</p>	<p>Many aspects of the proposed ordinance align with FutureLV (Policies 2.1, 5.4 and 2.2), and the LVPC notes opportunities to further strengthen the proposed ordinance.</p>



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

MEMORANDUM

DATE: March 25, 2026
TO: LVPC Commissioners
FROM: LVPC Staff
CC: Becky Bradley, Executive Director
 Jill Seitz, Chief Community and Regional Planner
REGARDING Draft Lehigh Valley Housing Supply and Attainability Strategy

INTRODUCTION

The Lehigh Valley Planning Commission (LVPC) has prepared the DRAFT Lehigh Valley Housing Supply and Attainability Strategy, attached to this memo. This effort represents a comprehensive, data-driven and collaborative approach to understand and address housing needs across Lehigh and Northampton counties.

PROJECT COLLABORATION

A defining component of this Strategy is its regional and cross-sector collaboration with hundreds of the Lehigh Valley’s municipal officials and representatives, school districts, developers, employers, financial institutions, housing professionals, and community organizations. The pre-publication version of the Draft Strategies was recently shared with key contributors and stakeholders who participated in shaping aspects of the Strategy. LVPC has begun receiving comments and is actively incorporating that feedback into the draft.

LVPC Commissioners, through the LVPC Comprehensive Planning Committee and at the multiple engagement events, meetings and workshops for this project, have also played a critical role in guiding and shaping the Housing Strategy throughout the project. We are now requesting your review and input on the DRAFT Strategy attached to this memo.

All feedback received from LVPC Commissioners will be incorporated alongside stakeholder input into the Final Draft Strategy. **Please submit comments via email to Planning@LVPC.org by Friday, April 3, 2026.**

NEXT STEPS

Following the Commissioner review period and incorporation of feedback, the Strategy will move into its final phases, which include Design and Layout by the Urban Land Institute, continued discussions and review of the Draft throughout April, and anticipated public rollout and formal adoption by LVPC in May.

Thank you for your support through this process. Your input is essential to ensuring the Lehigh Valley Housing Supply and Attainability Strategy reflects regional priorities and is positioned for successful implementation.



Lehigh Valley Housing Supply and Attainability Strategy

DRAFT

THIS IS A PRE-PUBLICATION VERSION FOR COMMENT ONLY.

Please email comments to planning@lvpc.org by April 3, 2026.



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Special Acknowledgement to former Lehigh County Executive Philips Armstrong and Richard Molchany, former General Service Director, who both believed that addressing the housing information shortage and affordability challenges is critical to a sustainable and resilient region.



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Special thanks to our colleagues Scott Greenly, Samantha Pearson and Joseph Dotta for your contributions to the Lehigh Valley Housing Supply and Attainability Strategy.



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Introduction

The Lehigh Valley Housing Supply and Attainability Strategy represents a coordinated, regionwide effort to address one of the most pressing challenges facing Lehigh and Northampton counties: ensuring that people at all income levels can find a home in the communities they value. As the Lehigh Valley continues to grow and attract new residents and investment, the rising cost of housing has made it increasingly difficult for households to enter or remain in the market. The typical homebuyer who once spent roughly twice their annual income to purchase a home is now often spending four times their salary, with projections suggesting that ratio could climb even higher if no action is taken. Without deliberate, sustained intervention, future generations will find it increasingly difficult to live and work in the region they call home.

Recognizing this challenge, Lehigh County made housing a priority and committed the funding necessary to launch this Strategy. The County contributed financial support for the project and has demonstrated its commitment through tangible actions, including restarting the long-dormant Lehigh County Redevelopment Authority, dedicating American Rescue Plan funding to leverage private investment in attainable housing, and annually allocating Community Development Block Grant resources to rehabilitate affordable homes for senior residents. These actions underscore a broader understanding that housing affordability is not solely a market issue, but a community responsibility tied to economic vitality, workforce stability, and long-term regional competitiveness.

Northampton County has likewise demonstrated a strong commitment to strengthening housing conditions and supporting community stability through proactive policy and partnership. As the county has experienced steady growth in population, employment, and new construction, local leaders have also recognized the parallel need to address blight and deteriorating properties that undermine neighborhood quality, property values, and municipal resources. In partnership with the Lehigh Valley Planning Commission, Northampton County's Department of Community and Economic Development launched the Northampton County Blight Reversal & Remediation Plan, a data-driven initiative informed by municipal surveys, stakeholder interviews, and a Blight Task Force representing all 38 municipalities in the County. By confronting blight strategically and collaboratively, Northampton County reinforces the foundation for healthy housing markets, directly complementing the broader goals of the regional Housing Supply and Attainability Strategy.

The Strategy is the product of a partnership among the Lehigh Valley Planning Commission (LVPC), the Urban Land Institute (ULI), Lehigh County, and Northampton County, along with the active engagement of municipal officials, housing professionals,

employers, nonprofit organizations, and community stakeholders across the region. Hundreds of leaders and practitioners contributed their time and expertise throughout the process, reflecting a shared commitment to confronting a complex issue through collaboration rather than fragmentation.

The LVPC, created in 1961 by Lehigh and Northampton counties, serves as the region's comprehensive planning and coordination agency for 62 municipalities and a population of more than 700,000 residents. The LVPC works at the intersection of land use, infrastructure, economic development, and public policy to ensure that regional growth is deliberate, data-driven and aligned with long-term community goals. Through plan review, municipal technical assistance, regional policy development, and implementation of *FutureLV: The Regional Plan*, the Commission helps local governments make informed decisions that balance growth with livability and fiscal sustainability. The LVPC also staffs the Lehigh Valley Transportation Study, integrating transportation investment with land use planning to support a coordinated, multimodal network. The Housing Supply and Attainability Strategy extends this regional planning framework by connecting housing production and affordability to infrastructure capacity, market conditions, and municipal policy tools, ensuring that housing solutions are grounded in both local context and regional coordination.

ULI, established in 1936 as a global nonprofit research and education organization, brought an independent, nationally informed perspective to the effort. Through its Advisory Services and Technical Assistance Panel programs, ULI assembles multidisciplinary teams of volunteer experts to provide objective, practical recommendations on complex land use challenges. The ULI Terwilliger Center for Housing, dedicated to advancing best practices in residential development and public policy, contributed research, technical expertise, and thought leadership focused on expanding housing opportunity across income levels. ULI's involvement ensured that the Strategy was informed not only by local conditions, but also by proven practices from communities across the country.

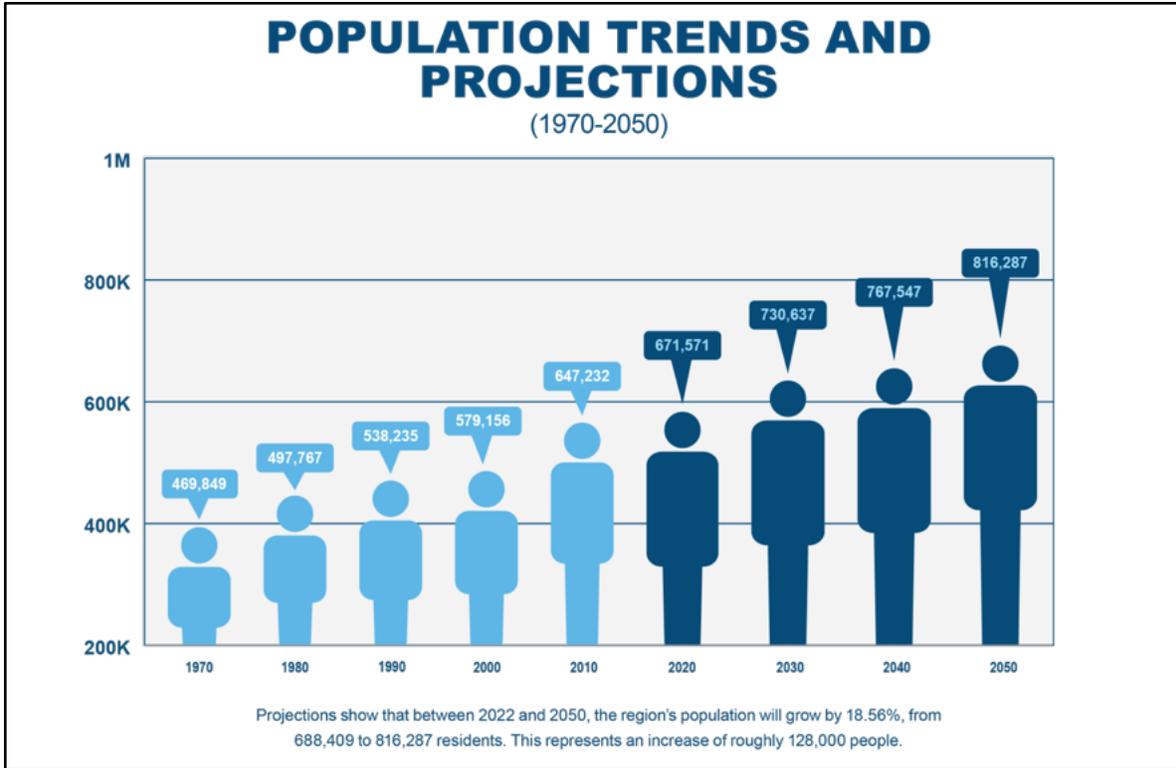
Together, these partners have produced an evidence-driven, action-oriented framework designed to increase housing supply, expand attainability, and align public and private efforts over the long term. The housing shortage facing the Lehigh Valley has developed over nearly two decades and will require sustained commitment to resolve. This Strategy establishes a shared foundation for that work, identifying practical steps that counties, municipalities, the development community, and regional partners can take to ensure that the Lehigh Valley remains a place where current and future residents can live, work, and thrive.

History & Background

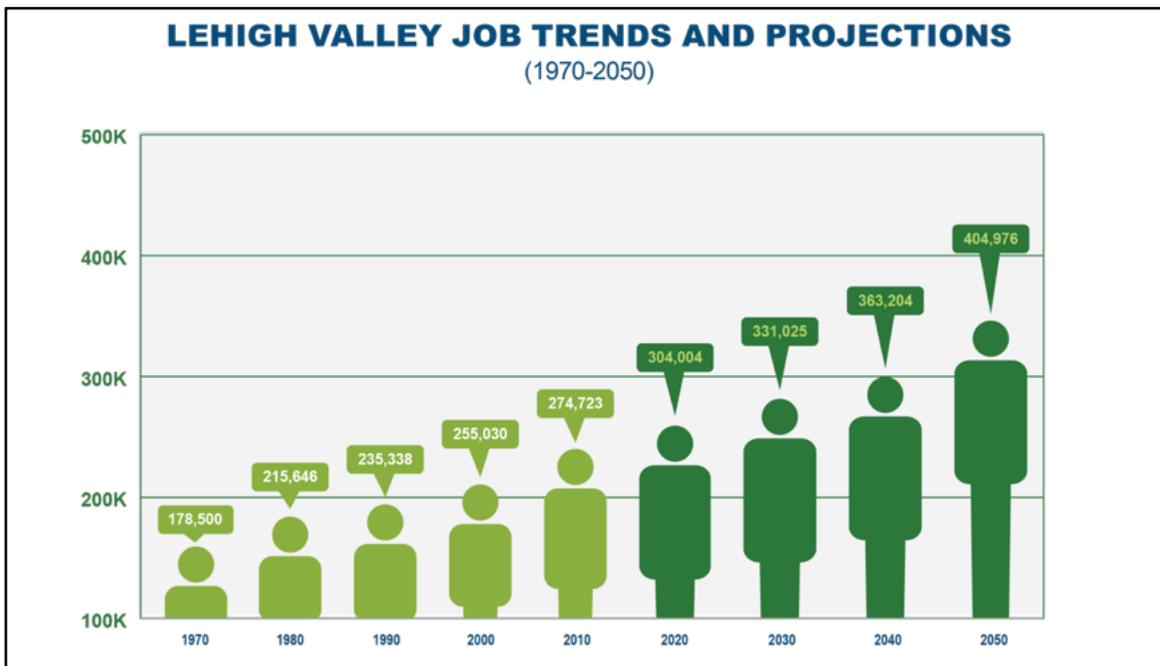
Situated in Eastern Pennsylvania, the Lehigh Valley encompasses Lehigh and Northampton Counties and 62 municipalities, including the cities of Allentown, Bethlehem, and Easton. The Lehigh River shaped the region geologically and economically, forming the valley, rich with natural resources, farmland critical to industrial, educational, finance, government, life sciences and healthcare sectors. Overtime, robust transportation, utility, parks and open space networks were developed to support the population and natural resources that supply the economy.



Today, the Lehigh Valley is home to more than 500 companies, and 16 colleges, universities, and technical schools drawing tens of thousands of workers and students to the area. Situated within a day's drive of nearly 100 million consumers, the Lehigh Valley is primed for continued growth and prosperity as a place where businesses want to be.



As one of the fastest-growing economies in the state, Lehigh Valley has seen a significant uptick in population growth. A projected 18.6% population increase by the year 2050 will add another 100,000 people, and employment will grow even faster, adding more than 80,000 jobs for a 24.9% increase by 2050.

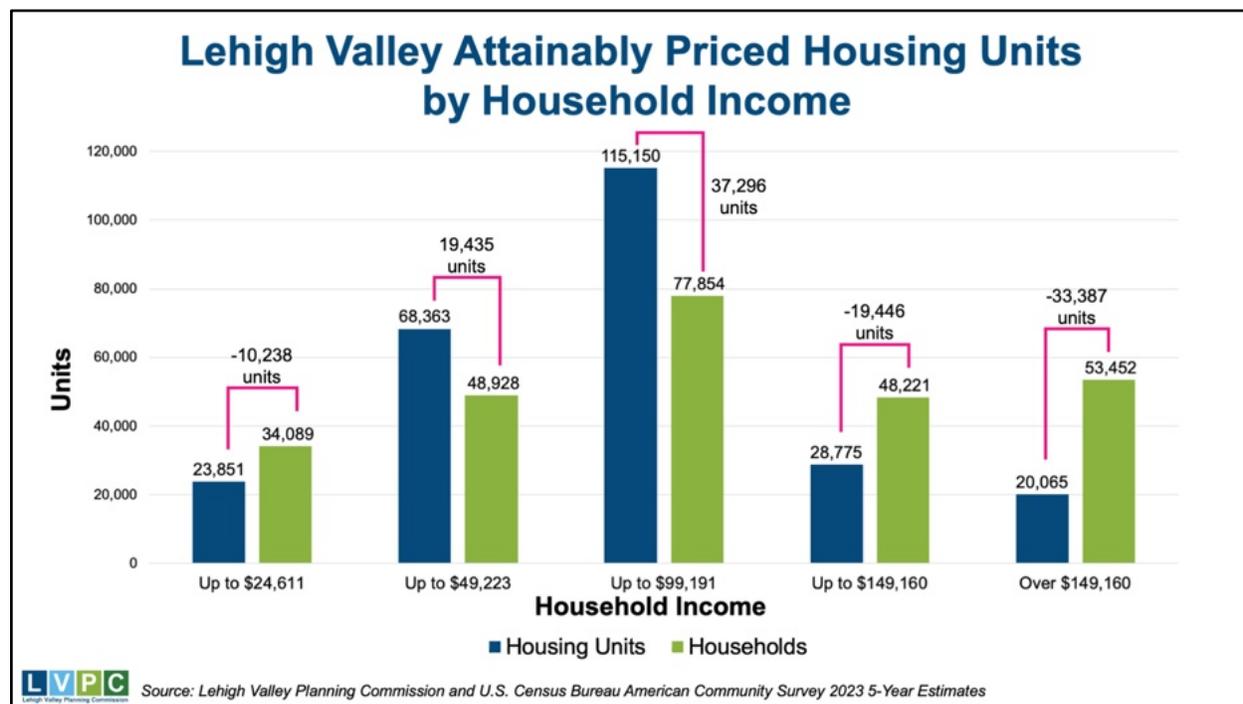


Like many areas in the U.S., the Lehigh Valley is facing a significant housing shortage. An estimated 54,000 housing units are needed regionwide by 2050. These include suppressed housing construction and development capital shortages, inflation, materials and labor shortages, school district financial concerns, overburdened or lack of infrastructure in key locations, lack of available land, land use challenges, and misconceptions about growth and density. Housing prices have outpaced income growth here as elsewhere across the US, and if the rise in housing costs continues, the average home will cost seven times the median salary by 2050—an unsustainable outcome. To support continued growth of a \$56 billion local economy, the Lehigh Valley, through this Housing Supply and Attainability Strategy is charting a new path to increase residential supply and affordability through actions that maintain the existing housing stock and increase unit production over the next 25 years.

The Lehigh Valley Planning Commission (LVPC), working regionally, with Lehigh County, sought a partner with national expertise to research, facilitate and co-develop a housing plan for everyone. The Urban Land Institute (ULI), the oldest and largest global network of cross-disciplinary real estate and land use experts, from the public, private, and service sectors joined with LVPC and Lehigh County to make this plan. Ultimately, this Housing Supply and Attainability Strategy aims to advocate for a realistic, fact-driven approach to housing for more a equitable, sustainable, healthy, and resilient region.

Understanding the Housing Challenge

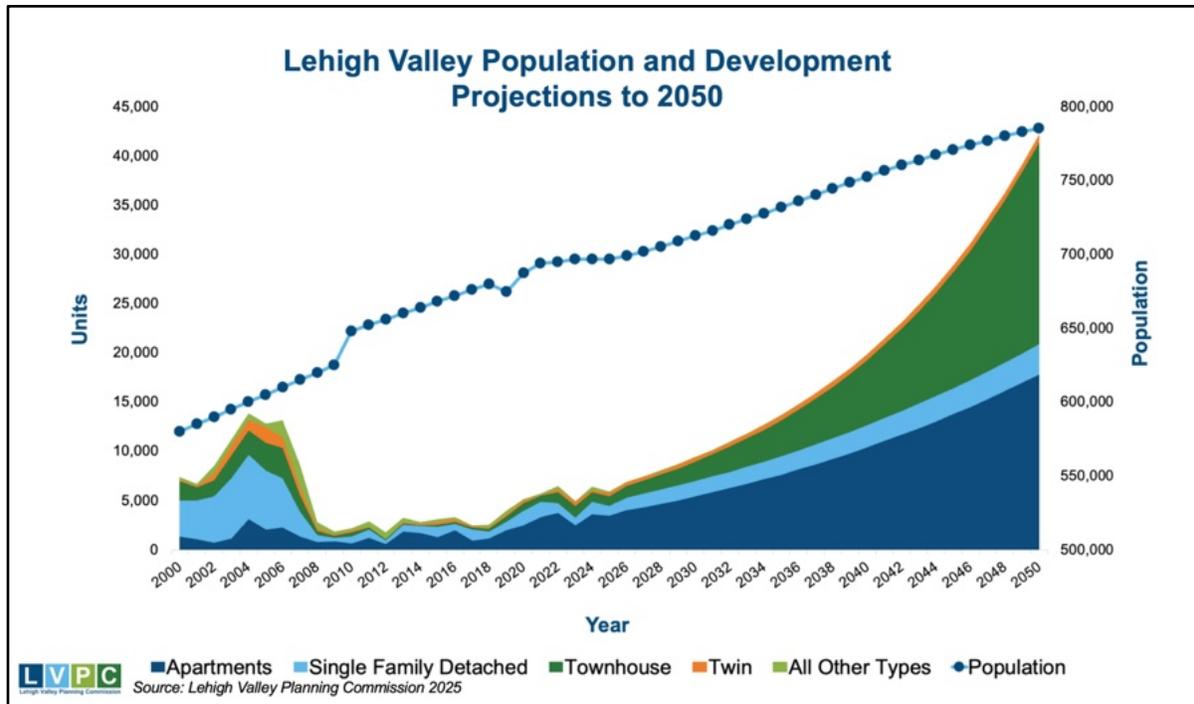
The Housing Supply and Attainability Strategy is grounded in a clear and urgent reality: the Lehigh Valley’s housing market is out of balance, with a mismatch between the number of households in the region and the number of homes available at affordable price points.



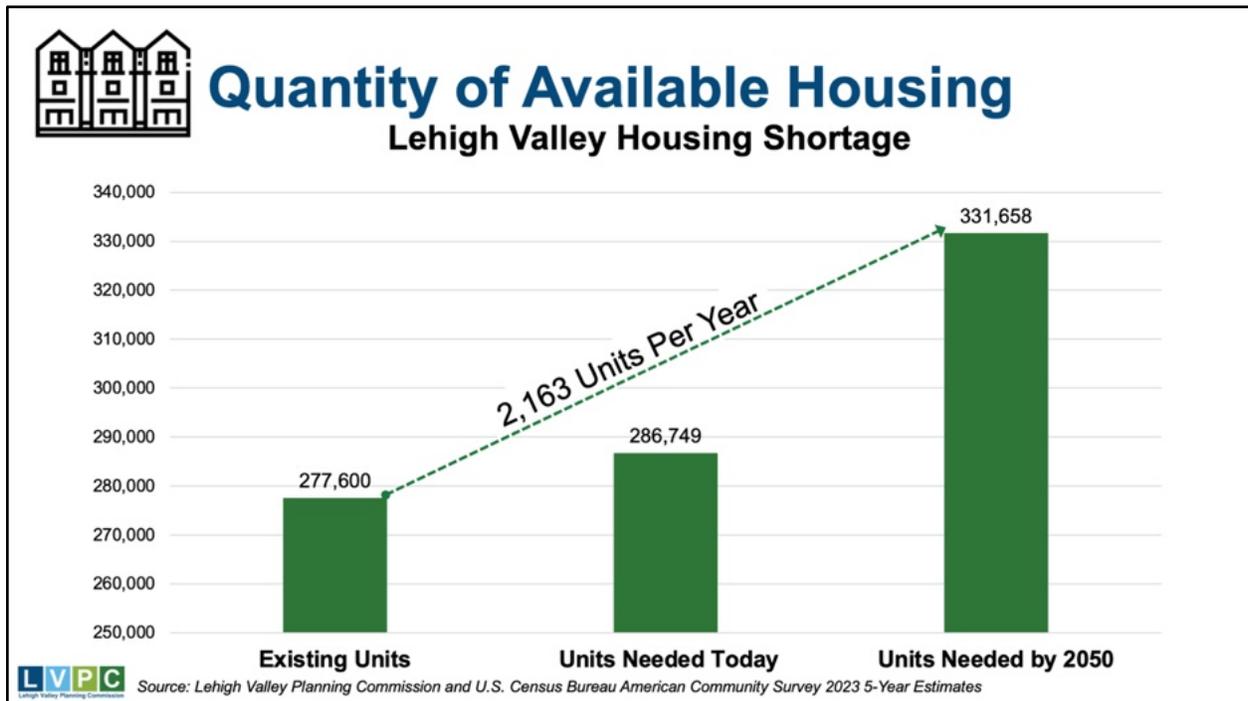
Using the industry standard that housing is considered attainable when it costs no more than 30% of household income, LVPC’s analysis reveals deficits at both ends of the income spectrum. There is a shortage of more than 10,000 units affordable to households earning under approximately \$25,000 per year, and a deficit of more than 50,000 units priced for higher-income households. As a result, households “buy down” or “rent down” into units that would otherwise be attainable to middle-income households, compressing the market and intensifying competition across price tiers.

Housing Development and Population Growth Trends

The region is also experiencing a broader supply shortfall. Based on natural vacancy rates (where a healthy housing market maintains approximately 3% to 5% of units available at any given time), the Lehigh Valley is currently short approximately 9,000 housing units. With a current inventory of roughly 278,000 units, the region should have closer to 287,000 units today to achieve balance. Looking ahead, continued population growth means the region will need approximately 54,000 additional units by 2050, an average of about 2,000 units per year, to both accommodate growth and restore healthy vacancy levels.

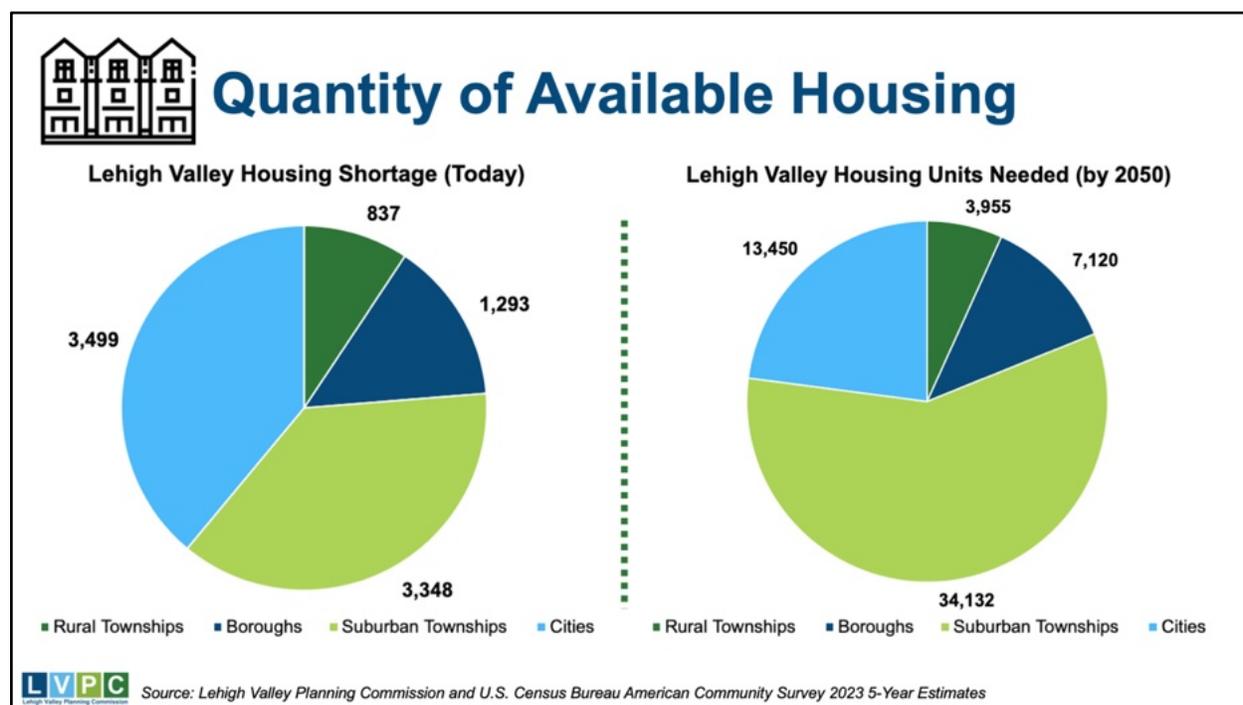


In recent development trends (over the last five years), an average of 2,100 residential units have been approved for construction by local governments per year. However, not all approved units are built immediately, and some projects are paused or delayed for several years before advancing. This lag between approvals and delivery means the market continues to chase a moving target.

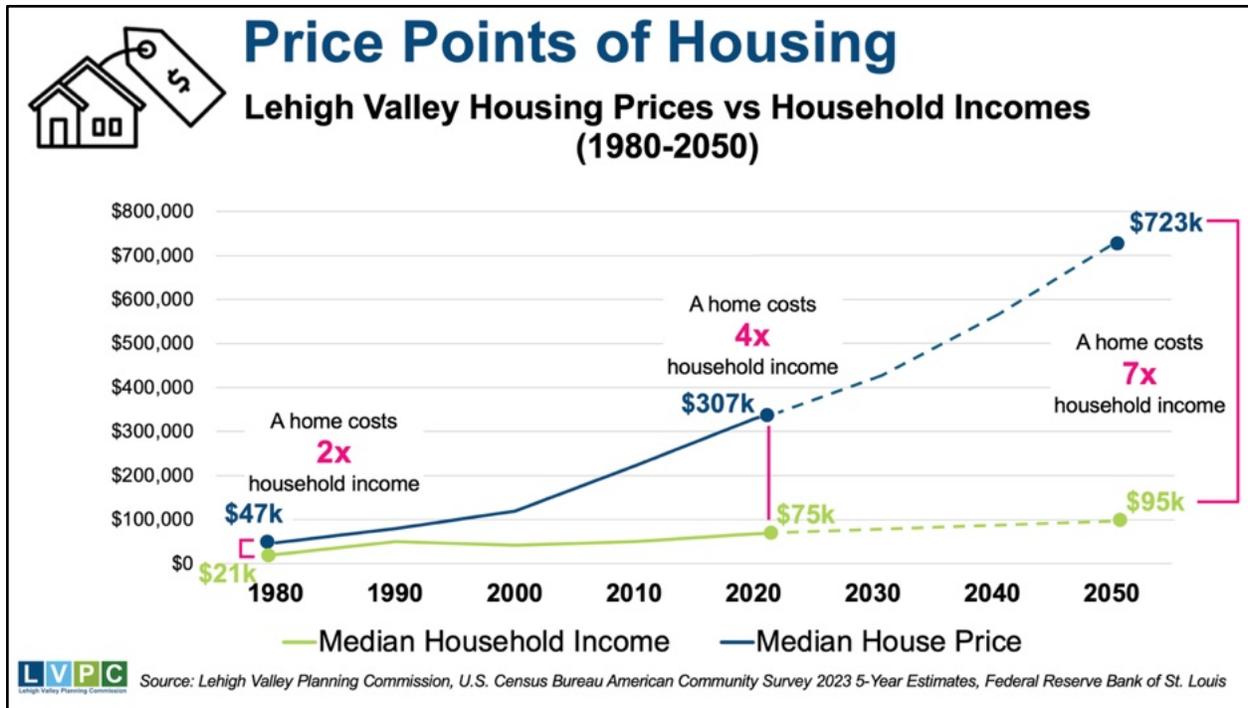


Geography-Specific Housing Needs

Housing challenges also vary significantly by community type. Suburban townships currently face some of the most significant shortages and are projected to experience the greatest increase in demand by 2050. These areas often have large amounts of single-family detached housing and limited housing diversity, which constrains options for smaller households, young professionals, and seniors seeking to downsize. At the same time, accommodating growth in a low-density, sprawling pattern risks the loss of farmland and open space, increased traffic congestion, and higher infrastructure costs. The region’s three cities of Allentown, Bethlehem, and Easton also experience high housing shortages, compounded by limited land availability, aging housing stock, and higher construction costs. Boroughs face similar constraints, with infill and infrastructure upgrades critical to absorbing growth. Rural townships currently have smaller shortages but are projected to see their housing needs increase substantially by 2050, creating tension between growth pressures and longstanding priorities of land preservation and agricultural protection.



Economic pressures compound these supply challenges. In 1980, a median-priced home cost approximately twice the median household income. By 2023, the median home price in the Lehigh Valley had risen to approximately \$307,000, while median household income was approximately \$75,000, meaning a home now costs more than four times annual income:



If current trends continue, projections indicate that by 2050, housing could cost more than seven times the median salary. This widening gap affects every generation differently: younger households struggle to enter the market; mid-career households find limited opportunities to move up; and older residents face barriers to downsizing due to insufficient smaller, attainable options.

These data points framed the public participation process and underscored why housing attainability is not simply a housing issue, but a regional sustainability issue. Housing availability influences workforce recruitment and retention, commuting patterns, transportation system performance, municipal tax bases, and long-term economic competitiveness. The Housing Storymap and Dashboard available at www.lvpc.org/housing were developed to make this data transparent and accessible, allowing municipalities, school districts, developers, employers, and residents to understand local conditions within the broader regional context. This housing dashboard is the first in the nation to quantify and statistically- validate residential shortages and availability, at the regional, county and local scale. The dashboard received the National Association Regional Councils' Award for Regional Achievement in 2025 and the Commonwealth of Pennsylvania utilized the methodology to support the statewide *Housing Action Plan* (2026).

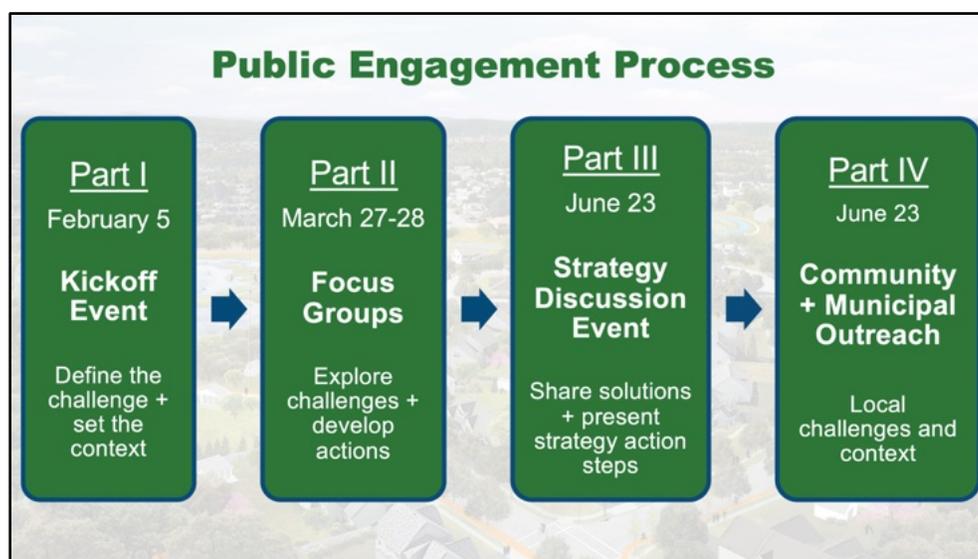


Together, the quantitative analysis and community engagement process reinforce a shared conclusion: without coordinated action to increase supply, diversify housing types, and realign price points with incomes, the Lehigh Valley risks constraining opportunity for current and future generations.

Developing the Housing Strategy

The Lehigh Valley Housing Supply and Attainability Strategy provides achievable ways of increasing housing at appropriate income levels and in locations that support the needs of everyone. The Strategy process acknowledges that solving the region’s housing supply shortage requires a multi-faceted approach and combines national expertise with local perspectives to identify a path forward. This effort drew on the Housing Supply Accelerator Playbook, developed in collaboration between the American Planning Association and the National League of Cities, as a guidance model that seeks to address the nationwide housing shortage by recommending an approach and array of solutions that can be applied at the local level.

Public engagement was central to the development of the Housing Supply and Attainability Strategy. Over the course of the process, the Lehigh Valley Planning Commission and its partners convened a wide range of voices -- including municipal officials, developers, lenders, employers, community organizations, school districts, and residents -- to better understand the region’s housing challenges and identify opportunities to address housing needs.



Through large regional events, targeted focus groups and technical assistance panels, workshops with local municipalities, individual conversations, and presentations at stakeholder meetings, participants shared their experiences on the barriers to housing production, their perspectives on concerns around housing development, and their ideas for opportunities and solutions. Participant input not only confirmed the depth of the housing challenge, but also provided practical insights that ultimately became the strategies identified in this plan.

Taking a Collaborative Approach Across Industries and Sectors

The best community engagement happens when stakeholders have a seat at the table and share their knowledge to inform the process, which supports the outcome. The appendices of this report outline the many people who had a hand in shaping the strategies outlined here, and the LVPC is deeply grateful for each person's and organization's contribution to these efforts. A full list of participants in the engagement process is included at the end of this plan.

Governments and Agencies

- **Local Governments** – Provide for development and land use through zoning and permitting.
- **Planners** – Design policies, plans, and community engagement processes that ensure housing growth is balanced, inclusive, and sustainable.
- **County** – Provide funding and housing programs, establish county housing priorities
- **LVPC** – Supplies regional data, analysis tools to guide fact-based housing strategies, provides guidance to communities on best planning practices.
- **State** – Establishes housing policies, programs, and funding.
- **School Districts** – Help align housing with school capacity and future growth.

Developers and Design Professionals

- **Developers** – Build housing and bring projects to market that address local shortages
- **Engineers** – Create plans for buildings and infrastructure (roads, utilities, stormwater, etc.) for construction.
- **Architects** – Design housing that is functional and aligned with community character.

Housing Market Professionals

- **Banks and Financial Lenders** – Provide financing for housing projects; innovate with loan pools, flexible lending products, and partnerships to reduce barriers for housing development.
- **Realtors** – Act as a bridge between available housing and residents; market attainable housing options, educate buyers and renters on programs, and provide feedback on what the market needs.

Businesses and Institutions

- **Employers** – Support housing close to jobs through employer-assisted housing programs and partnerships with developers. Stable housing strengthens the workforce.
- **Colleges and Universities** – Provide housing for students and staff, while collaborating on neighborhood revitalization and research that supports housing policy.
- **Community Organizations** – Engage directly with residents, elevating local needs and concerns. They can advocate for housing equity, connect people to resources, and partner on small-scale or nonprofit housing initiatives.

Community Engagement

February 5th Kickoff Event

On February 5, 2025, the Lehigh Valley Planning Commission (LVPC) and the Urban Land Institute (ULI) co-hosted the Kickoff Event for the Housing Supply and Attainability Strategy at DeSales University. The event brought together 180 housing stakeholders representing municipalities, developers, nonprofit organizations, and community leaders to examine the region’s housing shortage and begin shaping solutions.

The LVPC presented data showing the growing mismatch between population growth and housing production, highlighting that the region is falling short of the number of housing units needed to support current and future residents. The presentation also unveiled the Lehigh Valley Housing Attainability Dashboard, a new data tool that allows communities to assess housing supply and affordability at the municipal level. The dashboard features detailed information on unit shortages by municipality today and projected needs to 2050, as well as data on housing costs, unit diversity, and affordability by occupation. Later in 2025, this tool would be nationally recognized with the National Association of Regional Councils’ Medium Metro Award for Regional Achievement.

National expertise was provided by Deborah Myerson, AICP, with the ULI Terwilliger Center for Housing, who shared lessons from across the country on how regions are addressing similar shortages. Her presentation emphasized strategies to encourage market-rate housing development, adapt regulatory frameworks, and expand housing diversity.

Initial audience feedback reflected both concern and commitment. Attendees acknowledged the urgency of the problem and noted that the dashboard provided valuable, clear data to ground discussions. Municipal officials expressed interest in how the tool could inform local decision-making, while developers emphasized the importance of balancing regulatory reform with financial feasibility. Nonprofit and community representatives stressed the need for solutions that address both market-rate and attainable housing to meet the diverse needs of residents. Across the board, participants recognized the value of data transparency and regional collaboration as a foundation for next steps to address housing supply and attainability.



March 27-28 ULI Technical Assistance Panel

ULI conducted a Technical Assistance Panel (TAP) at the LVPC's office in Allentown, PA on March 27-28, 2025, bringing together practitioners from a diverse array of development and real estate-related backgrounds.

On Thursday, March 27, the TAP members gathered at the LVPC's offices, where they were introduced to LVPC staff who presented their work to date, including key data points to help inform the TAP's work and a newly unveiled website with a dashboard for tracking housing needs and availability. The bulk of the day was spent with the panelists gathering in smaller groups for interviews with an array of stakeholders. These included representatives from the Valley's 62 municipalities, ranging from rural and suburban to small towns and cities. School district and county, state, and federal officials; leaders from local nonprofits and universities; realtors, developers, and lenders; and representation from housing authorities and a workforce board rounded out the stakeholder participants.

Scope

TAP participants were asked to explore the following questions:

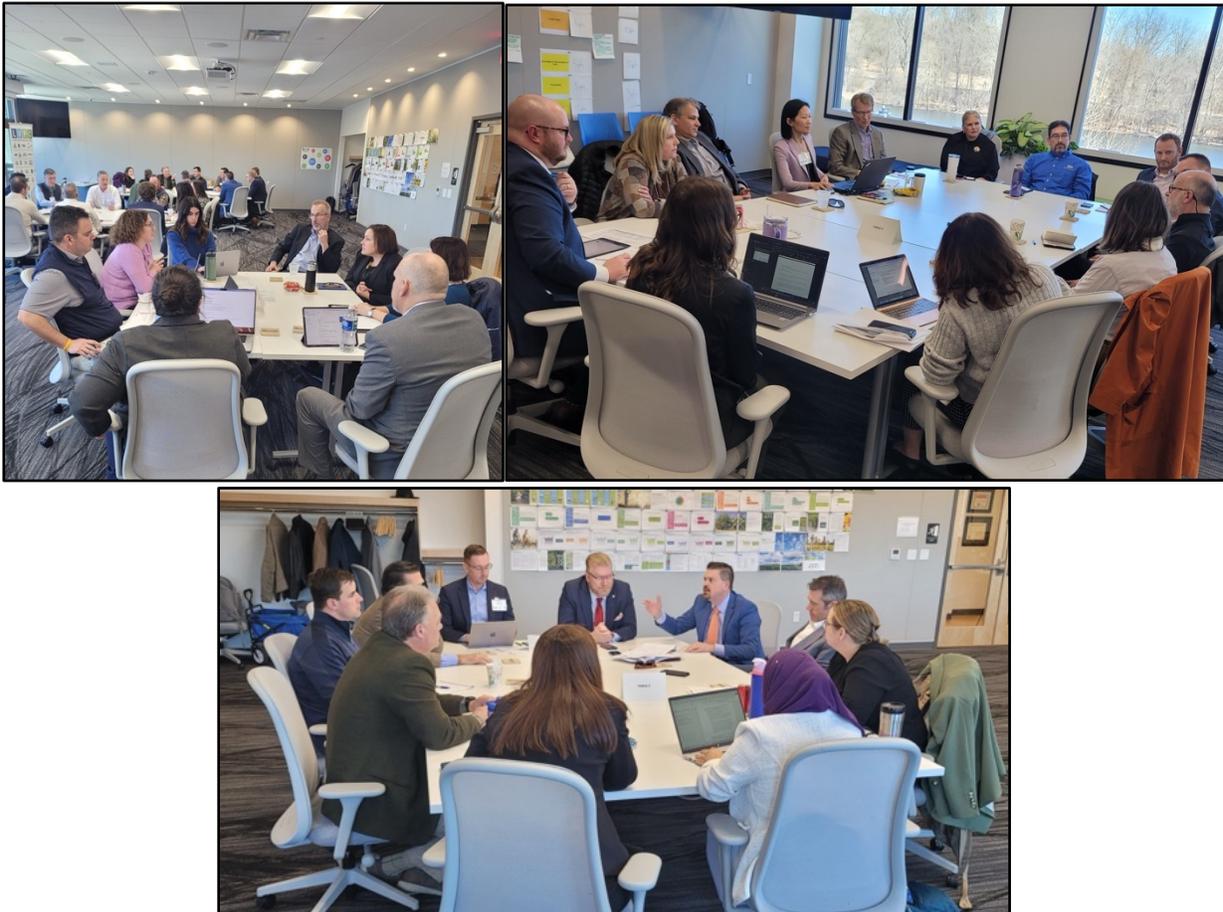
1. What are the biggest barriers preventing the development of new housing in the Lehigh Valley?
 - a. Are zoning regulations, infrastructure limitations, financing challenges, or community misconceptions the most significant hurdles?
 - b. How do these barriers vary across different types of housing (single-family, multi-family, workforce housing, senior housing, etc.)?
2. What strategies or policy changes could help increase housing supply at price points that match local income levels?
 - a. What incentives or regulatory adjustments could encourage more diverse and attainable housing production?
 - b. Are there successful examples from other regions that could be adapted for the Lehigh Valley?
3. How can municipalities, developers, financial institutions, and employers work together to support housing growth?
 - a. What role should local governments play in facilitating housing production?
 - b. How can employers, colleges, and other sectors contribute to expanding housing options for workers, students, and residents?
4. What specific actions should be included in the Housing Strategy – a business plan for housing – to ensure housing availability meets future demand?
 - a. What data, partnerships, or resources are needed to make informed decisions on where and how to build more housing?
 - b. How do we balance housing growth with infrastructure capacity, school district needs, and community preferences?

The group assembled the following day, Friday, March 28, and shared their findings from stakeholder conversations. Once they collectively identified some overarching themes and broader assessments, they broke out into smaller subject matter groups to develop their recommendations. Drawing from these findings, the group developed recommendations to address housing availability and attainability in the Lehigh Valley which laid foundation to develop the strategies outlined in this report.

ULI TAP Recommendations

The panel determined that LVPC and its stakeholder partners such as municipalities, planning professionals, developers, banks and lenders, community organizations, schools, employers, government agencies and representatives, and realtors each have a vital role to play in improving public perception around housing and the LVPC’s role, simplifying and streamlining regulatory practices and processes to aid developers and attract investment, and improving infrastructure to support growth.

The tactics identified through this process have been incorporated into the strategies outlined in this document. It is the panel’s hope that this collective effort and cross-disciplinary collaboration will create the conditions needed for future development and the creation of a housing economy that serves the region and its residents.



June 23rd Strategy Development Event

On June 23, 2025, the LVPC and ULI co-hosted a Housing Strategy Event as the third major milestone in the region's Housing Supply and Attainability Strategy process. Building on months of data analysis, public engagement, and ULI focus group discussions, the event marked a shift from defining the region's housing challenges to charting a course toward implementation as attendees provided initial feedback on strategies that had been identified so far in the process. More than 100 stakeholders attended, representing municipal governments, developers, financial institutions, engineers, architects, housing authorities, nonprofit organizations, and community leaders.

The program included an LVPC presentation emphasizing that addressing housing supply is not one-size-fits-all. It requires place-based solutions rooted in data, local context, and collaboration.

An expert panel discussion was moderated by LVPC staff and featured Michael Kimmey (LRK, ULI TAP Co-Chair), Shannon Norman (City of Indianapolis Department of Metropolitan Development), and J.B. Reilly (City Center Group CEO). The panel conversation was organized around four core themes that had emerged as participants developed draft strategies through the Housing Strategy process:

1. **Construction & Development:** Expanding housing types, accelerating review processes, directing housing to strategic sites, and aligning infrastructure investment.
2. **Finance:** Leveraging federal, state, and local funding tools, exploring innovative financial products, and connecting housing to centers and corridors.
3. **Land Use & Regulation:** Aligning zoning with *FutureLV's* balanced growth framework, facilitating adaptive reuse, and clarifying fair share housing guidance.
4. **Collaboration & Partnership:** Supporting small-scale developers, building a unified regional housing message, and providing training and education across sectors.

The event included a robust attendee question and answer session. Audience polling allowed participants to rank strategies in each category by perceived impact, while open discussion highlighted recurring themes. At the close of the program, participants were asked to identify one concrete action they or their organization could take within the next few months to support attainable housing. Over 80 responses were collected, illustrating strong cross-sector commitment.



Municipal and Community Outreach

As part of the Housing Supply and Attainability Strategy engagement process, the LVPC worked to connect with a broad range of community and institutional partners in addition to municipalities. The LVPC presented the Strategy and obtained feedback from the Workforce Board Lehigh Valley ENGAGE! Roundtable, the Greater Lehigh Valley Chamber of Commerce Board of Governors, and the Lehigh Valley General Assembly. These discussions provided valuable perspectives on how housing availability affects workforce stability, economic development, and regional competitiveness. Building on this outreach, LVPC also conducted subregional workshops with Lehigh County municipalities to explore locally focused housing challenges and opportunities.

Subregion Workshops: Discussing Local Housing Concerns and Needs

As part of community outreach and engagement, the LVPC conducted subregional workshops with Lehigh County municipalities. These workshops were held as part of the Lehigh County–funded Housing Supply and Attainability Strategy, which covers the entire Lehigh Valley but focused engagement activities within Lehigh County due to funding parameters. LVPC remains committed to engaging partners across both counties to plan for and support housing development regionwide and aims to continue targeted outreach beyond this study.

The Housing Workshops revealed a consistent set of concerns: infrastructure gaps, public opposition, affordability challenges, and limited municipal capacity. Importantly, these conversations also dispelled the myth that municipalities oppose housing outright. Instead, local governments are seeking support, tools, and investment to make housing feasible, tailored to the realities of their community type.

What We Heard: Stakeholder Insights and Findings

Throughout the Housing Supply and Attainability Strategy process, including LVPC-led engagement and the Urban Land Institute (ULI) Technical Assistance Panel (TAP) stakeholder interviews, and municipal consultations, participants consistently affirmed that the Lehigh Valley faces a measurable and growing housing shortage.

Regional Assets and Momentum

ULI's assessment through the TAP process identified several core strengths that position the Lehigh Valley to successfully address housing supply and attainability if barriers are addressed:

- **Strategic Location and Connectivity**
The region's extensive interstate highway network, proximity to major population centers in Philadelphia and New York City, and access to airports and ports have made the Lehigh Valley a logistics and distribution hub. This connectivity strengthens the region's economic competitiveness and reinforces demand for housing.
- **Institutional and Economic Assets**
The Lehigh Valley benefits from strong educational institutions, healthcare systems, corporate employers, and continued gross domestic product growth. These institutional assets attract businesses and talent, contributing to steady population growth—including among younger households—and increasing housing demand.
- **Leadership and Regional Convening Power**
Stakeholders commended the leadership of LVPC, Lehigh and Northampton counties in convening partners and confronting housing challenges directly. There was broad agreement that the region has the institutional capacity and collaborative foundation necessary to advance solutions.

Through the engagement process, several clear and recurring themes emerged. The findings below integrate stakeholder input and ULI's independent assessment, observations, and recommendations.

Taking a Contextual Approach to Housing Development

Across both LVPC engagement sessions and ULI interviews, participants emphasized that *where* housing is built is as important as *how much* housing is built. Municipal representatives were not resistant to additional housing in principle; rather, they were concerned about ensuring development aligns with local character, infrastructure capacity, and long-term goals. Municipal partners reinforced the need to work with LVPC, as a neutral, trusted planning partner to advance housing goals. Developers and banking partners expressed the same, further elevating the LVPC's role as a trusted entity, without financial or political motivation.

Cross-sector collaborations, with LVPC as a convening and coordinating entity, is seen as critical to implementation, as well as, monitoring and measuring housing outcomes.

Stakeholders expressed strong interest in aligning housing growth with:

- Open space and farmland preservation.
- Infill development in cities, boroughs, and suburban centers.
- Redevelopment of blighted and brownfield sites.
- Adaptive reuse of underutilized commercial and office buildings.
- Targeted development near downtowns, employment centers, and transit corridors.

Housing Diversity and Developer Capacity Constraints

Stakeholders repeatedly identified a constrained supply of diverse housing types as a core challenge. Key concerns included:

- Limited availability of housing suitable for different life stages:
 - Smaller homes for young professionals, such as townhouses and duplexes.
 - Single-story homes for seniors, such as bungalows and ranch-style houses.
 - Family-sized units, including attainably priced 3-bedroom homes and availability of three-bedroom rental units.
- Minimal use of modular construction, adaptive reuse, or other innovative building approaches.
- Investor-driven purchases contributing to rising prices in some communities.

ULI further observed that active residential developers in the region are at or near capacity and that financing options for small- and medium-sized builders are limited. Several participants noted that the pool of residential developers, particularly those capable of delivering small- and mid-scale projects, is too small to meet current demand. In addition, national homebuilders focus on large “greenfield” tract development, over smaller or more complicated sites, furthering the need to rebuild a local homebuilding community. The current development ecosystem lacks sufficient capacity to close the housing supply gap at the pace required.

Market and Financing Constraints

During the ULI TAP, stakeholders noted that national market conditions compound local challenges. High land costs, rising material and labor expenses, limited financing options for smaller developers, and wage stagnation relative to housing costs all affect project feasibility. In addition, the post-early 2000’s housing downturn led to a national lending framework favoring commercial real estate development over owner-occupied dwellings. Commercial real estate includes rental housing construction. Market rate rental housing is quickly becoming imbalanced in relation to available owner-occupied units. While these macroeconomic conditions are beyond local control, they must be acknowledged in planning and policy decisions.

Local financial institutions and public-sector partners identified the need for:

- Innovative lending products.

- Gap financing mechanisms.
- Workforce housing funds supported by county governments.
- Strategic use of tax incentives, including Local Economic Revitalization Tax Assistance Act (LERTA)-style programs.
- Expanded public-private partnerships.

Infrastructure Capacity: A Critical Constraint

Infrastructure emerged throughout the engagement process as one of the most significant barriers to housing production.

ULI TAP participants observed that water, sewer, and utility capacity limitations hinder development. Stakeholders also cited narrow roadways, aging systems, constrained school capacity in certain areas, and local service limitations as barriers to growth.

Within LVPC's municipal engagement sessions, sewer capacity and public resistance were identified as the top two constraints.

Communities reported:

- Aging systems and limited available capacity.
- High upgrade costs
- Challenges associated with updating Act 537 Sewage Facilities Plans.
- Concerns about long-term maintenance costs.
- Limited or no available grants or other funding sources for public improvements outside of local taxes.
- Widespread public aversion to tax and fee increases needed to maintain, improve and expand water, waste water, stormwater, parks, recreation, community facilities and schools.
- Municipal need for on-going analysis, measuring, monitoring, location identification and planning support.

Transportation infrastructure, including road and bridge condition and congestion, was also cited frequently. Developers are often responsible only for frontage improvements, leaving municipalities concerned about broader network impacts. Without coordinated regional infrastructure solutions, zoning and land use reforms alone will not be sufficient to meet housing needs.

Regulatory Complexity and Process Inefficiency

Across the engagement process, participants identified regulatory hurdles as a significant concern, including complex and unclear processes at municipal and state levels, limited professional capacity among many municipalities, and limited coordination across agencies. Lengthy or unpredictable review timelines increase carrying costs and disproportionately affect smaller-scale housing projects. While the development process can be protracted in the Lehigh Valley, overall developers cited that it is far more coordinated, reliable, and faster than in New

Jersey, Philadelphia and suburban Philadelphia. Municipal representatives emphasized the importance of complete applications and regulatory compliance, highlighting the need for balance and accountability across sectors. Appreciation for the LVPC's Land Uses of Regional Significance all-review agency coordination meetings was highlighted by local and state governments as improving communication and efficiency during the review process.

Government agencies reported:

- Systemic submission of incomplete and/or inaccurate zoning applications and development plans by developers and their engineers.
- Misalignment of regulatory timelines between local and state agencies.
- Limited internal capacity, resulting in heavy reliance on third-party legal, engineering, zoning review support.
- Limited internal capacity to engage in planning, including preparing comprehensive, sewer and water plans, official maps, review or amend current ordinances, resulting in reactive versus proactive approach to development.
- Need for a larger land development-focused talent pool of planners, engineers, zoning and code enforcement officials and attorneys to increase the efficiency and predictability of review and permitting processes.
- Desire to increase proactive and collaborative planning efforts, through multi-municipal comprehensive planning and coordinated zoning, Lehigh Valley General Assembly, sub-regional partnerships and the Lehigh Valley Government Academy.

Developers and their agents reported:

- Complexity of the land development process and need for clear expectations, especially when local and state approvals are required.
- Desire for more multi-municipal planning and coordinated zoning to reduce the complexities and inefficiencies associated with working with so many local governments.
- Need for training of volunteer, municipal zoning hearing board members, planning commissioners, township supervisors and borough council on the land development process.
- Need for a larger land development-focused talent pool of planners, engineers, zoning and code enforcement officials and attorneys to increase the efficiency and predictability of review and permitting processes.

Communities are actively reviewing zoning and subdivision and land development provisions to allow a broader mix of housing types, increasing knowledge through training, organizing in multi-municipal planning sub-regions and exploring tax abatement tools to incentivize residential investment. The challenge for local governments is to balance responsible oversight with efficient, predictable processes that do not unnecessarily hinder housing development or increase costs.

While, the challenge for the development community, is to ensure that engineering work is complete and accurate, following adopted municipal ordinances, which ensures the most efficient review and approvals process.

The challenge for both municipal governments and the development community will be to increase clear and respectful communication, building and maintaining trust in support of common housing goals.

The Need for Regional Cooperation

ULI observed that among the region's 62 municipalities, silos of self-interest and variations in local culture can inhibit comprehensive housing solutions. While developed areas may have established growth frameworks, some communities with less existing development remain cautious about policies perceived as increasing housing pressure. At the same time, LVPC engagement revealed strong consensus that the housing shortage is regional in scale and requires coordinated action. 36 of the region's 62 local governments are already in one of six formal multi-municipal comprehensive planning arrangements. Though, these local government-to-local government partnerships vary in their coordination, multi-municipal planning in the Lehigh Valley is exponentially higher than anywhere else in the state. Participants acknowledged:

- Housing challenges affect every community type.
- Infrastructure limitations must be addressed regionally.
- Solutions must reflect local context.
- No single municipality or sector can solve the issue alone.

Fragmentation can slow progress toward shared housing goals. A coordinated regional framework supported by the counties, LVPC, and municipal authorities can align local decision-making with regional housing objectives.

Public Perception and Community Opposition

Municipal leaders consistently cited public resistance to housing development, particularly denser or alternative housing types, as a major barrier. Common concerns include:

- Impacts on schools and taxes.
- Traffic congestion.
- Community character.
- Misinformation about affordability.
- Growing public anti-development sentiment.
- Public-led political pressure to down-zone or re-zone to limit growth, even where the factors supporting development are in place.
- Misconception that housing density will result in over-crowding.
- Public misconception of Pennsylvania land use laws and the requirements for county and local governments.

ULI TAP participant findings similarly noted that local culture and attitudes influence housing outcomes. Even projects that meet zoning requirements can face significant public opposition, creating political and procedural obstacles. Coordinated public education, unified messaging from trusted institutions (including LVPC, counties, employers, and community organizations), and transparent data tools can help reduce stigma and support informed decision-making.

Data, Evidence and Education as a Foundation for Action

Throughout the engagement process, participants emphasized the importance of data-driven decision-making. Stakeholders expressed strong support for:

- Detailed mapping of development, infill and redevelopment opportunities.
- School enrollment forecasting.
- Infrastructure capacity analysis.
- Policy impact modeling that illustrates “if-then” results to support better decision-making.
- Clear municipal-level measures of housing supply and affordability gaps.

Both ULI TAP and LVPC findings concluded that a single-regionwide cross-sector implementation group to key to supporting and tracking implementation and to developing resources to rapidly close the housing supply and attainability gaps. Wide acknowledgement that separate and disconnected efforts would slow housing production where noted. The LVPC was identified as the lead coordination and facilitation entity because of its expertise in data and analytics, facilitation, understanding of the planning and land development process, legal role as the bi-county planning commission and federally designated Metropolitan Planning Organization and as a neutral, reliable and trusted cross-sector partner.

The concerns and insights expressed throughout public engagement evolved into a series of tangible, actionable steps aimed at providing adequate housing at all price points.

Strategies to Accelerate Housing Supply in the Lehigh Valley

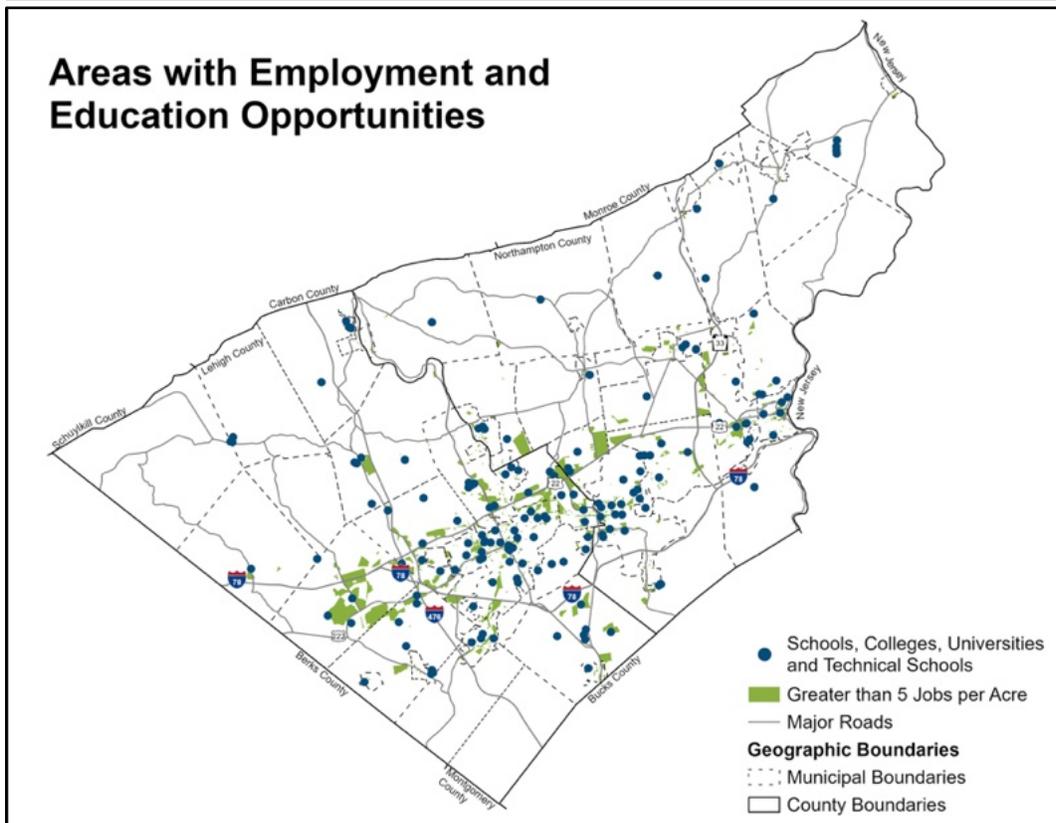
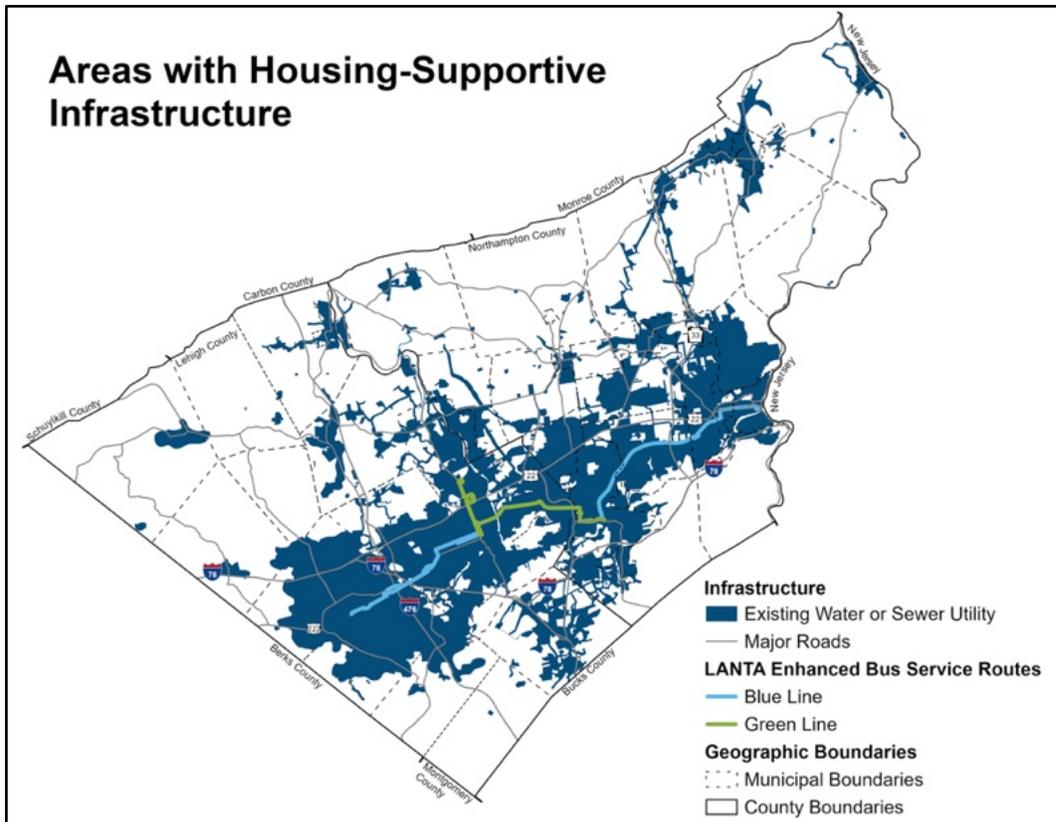
The Lehigh Valley Housing Supply and Attainability Strategy outlines a menu of strategies that must be taken to overcome the region's current 9,000-unit shortage and increase housing attainability in the future as the region continues to grow. Each strategy identifies entities, industries and/or sector groups who can implement the strategy.

The Lehigh Valley's communities, including rural townships, boroughs, suburban centers, and cities, face very different housing challenges. Because of this diversity, strategies to expand housing supply must be tailored to local context while following the framework established in *FutureLV: The Regional Plan*. Strategies in this document note where they apply especially to communities with Housing Growth Areas.

[Callout Highlight + Map] Housing Growth Areas: Tailoring Strategies to Place

Housing Growth Areas are the places most appropriate for new development. These areas generally follow the urban core along Route 22 and include Allentown, Bethlehem, Easton, surrounding suburban municipalities, and the region's boroughs. They are best equipped to support housing growth because they already have, or can efficiently extend, public water and sewer service, roadway access, and proximity to jobs, education and services.

Outside of these growth areas, preservation remains a priority. Rural landscapes, farmland, and natural resources define the region's character and are not suited for large-scale development. Limited, context-sensitive housing may occur in rural villages or through small-scale approaches such as accessory dwellings, but the most impactful strategies should be directed to Housing Growth Areas. This ensures the region meets its housing needs while maintaining the balance of growth and preservation.



The strategies developed through participant input are organized into four categories:

Construction and Development

- Addressing the physical, market, and workforce factors that influence whether and how housing gets built in the Lehigh Valley.

Finance

- Aligning financial tools, incentives, and capital flows to support housing affordability and production at all income levels.

Land Use and Regulation

- Using zoning and regulatory tools to create conditions that guide contextual development and allow for diverse housing types at a variety of price points.

Collaboration and Partnership

- Increase coordination across industries and sectors to facilitate additional housing supply.

The strategies are organized by implementation timeframe to expected pace of action and reflect the level of coordination, policy change, capital investment, and partnership required for implementation:

Short-Term (Within 1 Year) strategies are immediate actions that can be launched and substantially advanced within the first year. These include education efforts, administrative improvements, pilot programs, and alignment of existing tools and funding sources, and lay the groundwork for broader change.

Medium-Term (Within 5 Years) strategies involve more structural changes, such as ordinance revisions, program development, infrastructure planning, financing mechanisms, and expanded partnerships. These actions typically require formal processes, coordination across multiple entities, or sustained investment.

Long-Term (Within 10 Years) strategies represent larger transformational efforts, including major infrastructure investments, market shifts, institutional land use changes, or state-level reforms. These initiatives often build on earlier milestones and require continued collaboration over time.

The strategies that follow reflect both national best practices and the lived realities of the people and institutions working every day to meet housing needs in Lehigh Valley communities.

Construction and Development

We can't build more housing without developers, engineers, architects, and construction workers. Many material, market, and workforce factors influence whether and how housing gets built in the Lehigh Valley. Despite supply chain disruptions, labor shortages, and increased cost of materials, the Lehigh Valley market is projected to grow, and the region currently gains nearly 4,000 new residents per year. Developers can leverage this growth to build attractive, profitable projects while helping meet the housing demand in the region.

The Commonwealth's Housing Action Plan 2026-2035 calls for Pennsylvania to become a top leader in new housing production while lowering regulatory barriers and accelerating development timelines. The following strategies align with that statewide call to increase housing supply and modernize development processes.

Summary of Strategies

Strategy	Implementers
1.1 Expand housing construction to include innovative residential construction technologies and a wider range of housing types.	Developers, Municipalities
1.2 Accelerate residential development review and approval processes.	Municipalities, Planners, Developers
1.3 Direct housing to areas that communities identify as prime residential development or redevelopment sites.	Developers, Municipalities, Counties, LVPC, Community Organizations
1.4 Strengthen local infrastructure and services to support sustainable housing growth.	Utilities, Public Agencies, Developers
1.5 Advocate for improvements to state-level regulations to accelerate housing development.	State Agencies, Local Advocates

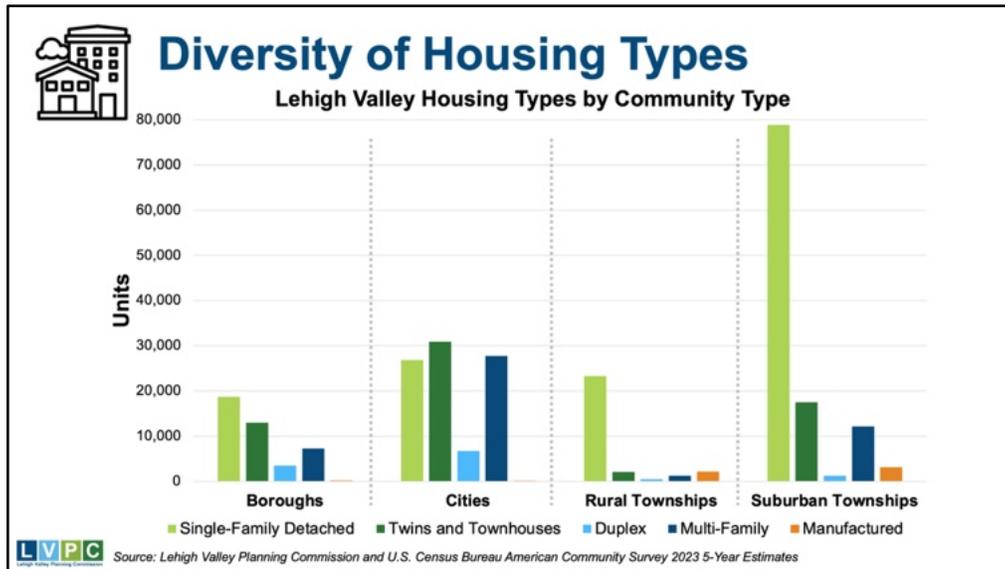
1.1 Expand housing construction technologies, forms and types.

Implementation Timeframe: Long Term (10 years)

A lack of housing diversity constrains attainability. Rural and suburban townships are dominated by single-family detached homes, with limited representation of twins, townhouses, or multifamily units. Boroughs offer a somewhat broader mix, while cities provide the most diverse housing stock. However, evolving household structures demand greater flexibility across all community types. Since 2010, multigenerational households in the Lehigh Valley have increased by 19.1%, reflecting national trends driven by caregiving needs, cultural preferences, and rising housing costs. Communities with limited housing variety are less equipped to meet these changing demographic realities.

To meet the growing demand for affordable and diverse housing, developers should pursue projects that include a range of housing types using innovative technologies and efficient design practices. These emerging technologies can deliver more affordable units at a quicker pace than traditional construction. As communities continue to modernize

regulations, developers can leverage emerging construction technologies to pioneer innovative residential types to better serve the diverse needs of Lehigh Valley residents.



⇒ **1.1a Developers should integrate alternative building methods such as manufactured, modular, panelized, 3D printed, and recycled material homes to shorten timelines and reduce costs.**

Implementation Timeframe: Medium Term (5 years)

Higher Density Manufactured Housing: [Black Street, Pittsburgh, PA \(Courtesy Module\)](#)



Pre-manufactured houses in Pittsburgh.

**Lower Density Manufactured Housing: [Colonial Heritage Doylestown, PA](#)
(Courtesy ABC Home Sales)**



Pre-manufactured house in Doylestown.

3-D Printed Housing: [X-Hab 3D](#)



X-Hab 3D, a Pennsylvania company, partnered with Habitat for Humanity to construct Pennsylvania's first 3-D printed house near State College (also pictured below). The project creates an example of housing construction that reduces labor demands, utilizes alternative building materials, and fits into a suburban residential context.



Recycled Material Housing: [CW Dwellings](#)



CW Dwellings, a Pennsylvania company, builds homes out of recycled shipping containers. The homes are assembled inside a factory and then moved and installed on a site. Their sizes can be as small as “micro” studio apartments (around 200 square feet) up to two-story buildings at 1,700 square feet.



⇒ **1.1b Engineers and architects should create small-footprint and flexible housing layouts suited for multi-generational, aging and starter households.**

Implementation Timeframe: Medium Term (5 years)

- Smaller homes can increase affordability and land efficiency while accommodating diverse household types like seniors, college students, and couples. These homes serve as ideal starter homes, aging-in-place options, or downsized residences, and can also provide homeowners with revenue opportunities by renting new units and create new property tax revenue for the municipality. Different forms of small-footprint housing include:
 - **Accessory Dwelling Units (ADUs):** A residence subordinate to the principal permitted residential building and located on the same lot. Also known as “granny-flats” or “cottage houses”, these units are typically no more than 1,200 square feet and can be built as an addition to an existing dwelling house or separately in the backyard.
 - **Alley Houses:** A type of ADU in an urban setting, typically built behind a main building and primarily accessed via an alley rather than the property frontage.
 - **Tiny Homes:** A dwelling unit placed on a property as either a principal or accessory dwelling unit with a habitable floor area between 150 square feet and 400 square feet. Constructed with a foundation or on wheels.

[CALLOUT: Addressing Senior Housing Needs]

Communities should discourage age-restricted housing developments as an exclusionary and increasingly expensive housing type, and instead promote universal design and smaller-scale housing types suitable for seniors and others. Ranch-style homes, bungalows, condominiums and accessibly-designed multi-family units can all be viable options for residents to age in place. Increasing housing mobility for seniors can

have a domino effect across the market as larger housing units become available to growing families.

⇒ **1.1c Developers should explore constructing homes with sustainable technology such as Passive House, Net-Zero, or ENERGY STAR models.**

Implementation Timeframe: Long Term (10 years)

- Increasing housing options that offer net zero or significantly lower energy use may fill a need in the market and lower the utility costs associated with owning a home.

1.2 Accelerate Development Review and Approval Processes.

Implementation Timeframe: Medium Term (5 years)

⇒ **1.2a Enhance communication and transparency between project applicants and municipalities.**

Implementation Timeframe: Short Term (1 year)

- Project applicants (developers, engineers and other involved parties) should increase and expand understanding of local review requirements and timeframes to better navigate regulatory processes.
- Municipalities should offer clear materials to inform project applicants navigating local review processes, reducing confusion and back-and-forth delays.
 - Creating procedural guides, checklists, FAQs, and direct support services can improve transparency and engagement throughout the process.
- Municipalities with Housing Growth Areas should increase understanding of developer and market needs when evolving regulatory processes and guidance materials.

⇒ **1.2b Municipalities should streamline local review and permitting processes.**

Implementation Timeframe: Medium Term (5 years)

- Municipalities should regularly review internal operations, organizational structure and management to reduce administrative burdens and ensure project reviews and permitting procedures are efficient and timely. Making processes more efficient and straightforward can attract higher-quality development and reduce costs passed on to residents.
 - Tools such as a flow chart of the steps needed for review and approval make navigating the process more user-friendly.

⇒ **1.2c Municipalities with Housing Growth Areas should expedite development review.**

Implementation Timeframe: Medium Term (5 years)

- Creating and deploying pre-approved housing plans encourages applicants to submit projects that align with the community's vision and reduce administrative burdens and approval timelines for local governments.

- Example: The City of South Bend, Indiana offers pre-approved building plan sets at no cost to support local infill and economic opportunities.
- Expanding staff capacity, improving interdepartmental coordination and designating staff specifically focused on development review can increase review efficiency and avoid delays.
 - Smaller communities can consider jointly hiring designated staff to facilitate development processes throughout a subregional area.
- The LVPC can expand training programs and provide technical assistance to evaluate local processes for opportunities to increase efficiency.

⇒ **1.2d Project Applicants (Developers, Engineers, Architects and Planners) should evaluate current practices to help expedite approval timeframes.**

Implementation Timeframe: Short Term (1 year)

- Certain project delivery and billing approaches by project consultants can unintentionally extend approval timelines and increase costs. Project consultants should prioritize clear, complete and cost-conscious applications to minimize the number of resubmissions needed to review agencies, supporting faster review timeframes, increasing project schedule predictability and ultimately improve the feasibility of producing a wider range of housing options.

1.3. Direct residential development to Housing Growth Areas.

Implementation Timeframe: Long Term (10 years)

To increase housing supply while minimizing sprawl and infrastructure costs, communities should prioritize growth along Centers and Corridors identified in *FutureLV: The Regional Plan*, and infill development on vacant parcels within existing neighborhoods.

⇒ **1.3a The LVPC can continue to expand a suite of tools that direct development to key locations and avoid unsuitable or hazard-prone areas.**

Implementation Timeframe: Medium Term (5 years)

- The LVPC, in partnership with municipalities, the Counties, the Lehigh County Redevelopment Authority and other regional stakeholders, can develop and maintain a Geographic Information Systems (GIS)-based database of development-ready sites and key housing development areas. Properties in the database can include vacant, underutilized, and tax-delinquent parcels suitable for housing, infill opportunities and include key attributes to inform project siting such as zoning, land size, ownership status, proximity to transit or amenities, and utility infrastructure availability as well as hazard prone areas environmental constraints. The online database should be publicly available and promote intentional, strategic growth by directing investment and helping developers evaluate project feasibility. Making land use regulations more transparent spurs development, informs decision-making, and empowers communities with more understanding about housing issues.

⇒ **1.3b Developers should seek development infill opportunities.**

Implementation Timeframe: Medium Term (5 years)

- Municipalities should align land use policy and incentives to prioritize infill development over greenfield expansion. Tools such as targeted zoning overlays, tax incentives, reduced parking requirements, and expedited permitting can make infill projects more attractive to developers.

⇒ **1.3c Developers should direct housing along centers and corridors.**

Implementation Timeframe: Long Term (10 years)

- The region's centers and corridors provide a skeleton of where utility infrastructure either already exists or can be extended to accommodate growth. This can lessen the upfront costs and increase the inventory of "shovel ready" sites in the Valley. By directing development to these areas, residents will be closer to job centers and more of their daily needs.

⇒ **1.3d Developers should direct housing along transit routes, especially Enhanced Bus Service routes**

Implementation Timeframe: Long Term (10 years)

- Developers should undertake transit-oriented development (TOD) projects, including mixed-income developments and walkable neighborhoods, within a half mile of key transit stops to capitalize on the conjoined benefits of multimodal infrastructure and higher density development. TOD's not only help reduce household transportation costs and carbon emissions but also supports population growth in a way that leverages and strengthens existing infrastructure. Better public transit enables population growth, and vice versa. This strategy works in tandem with Strategy 3.1h directing municipalities to ensure local zoning facilitates TOD projects. Municipalities, developers and employers should continue to work with LVPC and the Lehigh and Northampton Transportation Authority (LANTA) to ensure that service keeps pace with growth areas and resident needs.
- Example: Pittsburgh's Martin Luther King Jr. East Busway Bus Rapid Transit (BRT)
 - The Institute for Transportation and Development Policy found that even moderate municipal support for TOD around BRT systems yields community and private investment that exceeds initial public costs. Pittsburgh, an early U.S. adopter of BRT after converting its streetcar system, built three routes. While the South and West Busways lacked TOD support, the East Busway, particularly East Liberty Station, saw significant returns. For every \$1 million invested in TOD, \$3.59 million followed. Redevelopment replaced three 20-story towers with guaranteed housing for residents, spurred non-profit led revitalization, and outperformed the West Busway by 10% in housing growth.



Throughout the engagement process, participants identified single-story ranch style homes as a housing type that has been seldom seen in new construction projects but is highly desirable as a form of single family residential that is suitable through all stages of life and is generally lower-cost.

1.4. Strengthen local infrastructure and services to support sustainable housing growth.

Implementation Timeframe: Long Term (10 years)

Accommodating housing growth requires strong public services, resilient infrastructure, and vibrant public spaces. Municipalities must coordinate across jurisdictions to deliver essential services like fire, emergency management services (EMS), water, and sewer. At the same time, investments in public spaces and infrastructure can revitalize neighborhoods, attract housing development, and improve quality of life.

⇒ **1.4a Municipal service providers and engineers should assess capacity gaps and align capital improvement planning with expected housing growth areas.**

Implementation Timeframe: Medium Term (5 years)

- Water, wastewater, and stormwater infrastructure are foundational to both new development and existing neighborhood viability. Municipalities should work with the Counties to proactively identify opportunities for infrastructure upgrades, and with the Pennsylvania Infrastructure Investment Authority (PennVest) for capital funding support where housing needs are greatest.

⇒ **1.4b Municipalities should explore opportunities to coordinate fire and emergency management services across jurisdictions.**

Implementation Timeframe: Medium Term (5 years)

- Municipalities should assess emergency response service (EMS) coverage by conducting a shared audit of existing fire and EMS capabilities, staffing, equipment, and response times. This assessment should evaluate both current and future housing needs to identify service gaps, duplication, and opportunities for mutual aid agreements or shared-service models to improve efficiency and outcomes.

⇒ **1.4c Support public space investments to catalyze neighborhood revitalization.**

Implementation Timeframe: Medium Term (5 years)

- Strategic investment in parks, streetscapes, and green infrastructure can serve as a catalyst for neighborhood improvement that attracts residential development. Targeted upgrades around community parks, lighting, sidewalks, and public gathering areas can enhance safety, increase community pride, and create conditions that appeal to new residents.

⇒ **1.4d Local governments should leverage state programs and resources to strengthen local infrastructure.**

Implementation Timeframe: Short Term (1 years)

- The *Commonwealth Housing Action Plan 2026-2035* calls for increased investment in infrastructure to support housing growth. The Plan proposes a Critical Infrastructure Investment Fund that aligns state and local capital planning to accelerate production. Local governments should identify infrastructure gaps in designated growth areas and position projects to compete for emerging state funding and technical assistance opportunities.

1.5. Advocate for improvements to State-level regulations to accelerate housing development.

Implementation Timeframe: Long Term (10 years)

Stakeholders throughout the process advocated for reform to State-level procedures to unlock and accelerate the development review process. State agencies can streamline permitting processes to reduce delays and increase predictability. Through collective advocacy and partnership, local governments including municipalities, Counties and LVPC

can help lead changes to state regulatory frameworks to reflect current housing challenges.

⇒ **1.5a State departments should continue to improve internal efficiency and work with local governments to better align with local regulatory timelines.**

Implementation Timeframe: Medium Term (5 years)

- The State has undertaken steps to expedite permitting processes and timelines. Additional steps specifically to address housing in Pennsylvania have been identified in the Commonwealth of Pennsylvania Housing Action Plan 2026-2036, released on February 12, 2026.
- Municipalities across the Lehigh Valley can use their collective influence to continue to advocate for regulatory best practices at the state level, ensuring that state review and permitting timelines adequately align with local review timelines, and to provide clearer guidance and reduce back-and-forth delays.
- Developers, especially smaller and infill-focused builders, have previously reported significant barriers related to the National Pollutant Discharge Elimination System (NPDES) permitting process, with multi-month delays making many projects financially infeasible. The state should continue to monitor and evaluate improved NPDES review procedures with the goal of simplifying, expediting, or scaling requirements based on project size and impact.

⇒ **1.5b Advocacy groups and housing coalitions should advocate for the state to enable fast-track permitting for housing affordable to the local workforce.**

Implementation Timeframe: Long Term (10 years)

- The State and municipalities should create fast-track permitting pathways specifically for workforce and affordable housing projects. Legislation or policy support could facilitate the adoption of local fast-track review programs by offering technical assistance, funding for staffing, or regulatory tools.

Example: Massachusetts Chapter 40b

Massachusetts Chapter 40B is one of the only statewide permitting-acceleration programs in the U.S. It consolidates local approvals into a single comprehensive permit when 20-25% of units are affordable to households earning 50-80% of AMI. A 2024 Harvard University study found that 40B developments are in neighborhoods with greater economic mobility, stronger schools, higher social capital, less pollution, better health outcomes, and lower incarceration rates than the typical Massachusetts neighborhood.

⇒ **1.5c Modernize the Uniform Construction Code to Support Sustainable, Affordable, and Context-Responsive Housing Development**

Implementation Timeframe: Long Term (10 years)

- Municipalities play a critical role in shaping the standards that govern how housing is built across Pennsylvania. By proactively identifying and submitting recommended updates to the State's Uniform Construction Code (UCC), local governments can help ensure that the code reflects evolving best practices in sustainability, affordability, safety,

and innovation. Engaging with the Pennsylvania Department of Labor and Industry – responsible for UCC administration – can advance regional housing goals by removing regulatory barriers to building the kinds of homes communities need most. Municipalities, LVPC and developers can work together to develop a package of recommended code changes to submit to the Department of Labor and Industry as part of the state’s periodic UCC update process.

Conclusion

Constructing the 54,000 units the Lehigh Valley needs by 2050 is a monumental challenge, but by applying innovative construction methods and flexible housing types, streamlining the review process, and directing development to appropriate spaces, Lehigh Valley housing partners can lessen the barriers that housing development proposals encounter. Investment in public infrastructure is also essential to facilitate residential growth in new areas. With these strategies in mind, developers can contribute positively to the communities they work in and deliver quality housing to all Lehigh Valley residents.

Finance

A thriving housing market depends not just on vision and land availability, but on strategic and available financing. As the Lehigh Valley works to expand housing opportunities across income levels, it is essential to align public, private, and nonprofit collaborations and funding tools. This section outlines actionable financial strategies that can help close development gaps, accelerate housing production, and create lasting pathways to affordability and ownership.

Summary of Strategies

Strategy	Implementers
2.1 Create regionwide public collaborations and incentive programs that fund needed housing development.	Counties, State, Municipalities, LVPC
2.2 Continue using state, county and municipal programs to support housing development.	Developers, Municipalities, Counties
2.3 Implement financing products that support constructing a variety of housing types.	Banks and Financial Institutions
2.4 Continue using federal funding sources to support housing development.	Developers, Municipalities, Counties, States
2.5 Utilize financial tools to reduce barriers and develop pathways to homeownership.	All Implementation Partners
2.6 Continue analysis and implementation of these strategies to develop after-action items.	LVPC

DATA CALLOUT

The average cost to build a single-family home in the Lehigh Valley is \$150-\$200 per square foot in the mid range, not including acquiring land and local review and permitting costs ([Penn Contractors](#)).

2.1 Create regionwide public collaborations and incentive programs that fund needed housing development.

Implementation Timeframe: Medium Term (5 years)

Develop a suite of publicly-supported incentive programs that augment existing housing investment tools, such as the Local Economic Revitalization Tax Assistance (LERTA) and the Allentown Neighborhood Improvement Zone (NIZ). Existing tools prove to be effective at spurring growth by revisioning and reutilizing underperforming and vacant properties. And, deployment of federal community development block grant (CDBG) funds, has preserved and improved housing over decades. Recent changes in the nation’s capitol have made federal funding less reliable. Pursuing new publicly-supported financing tools is critical to increasing attainability, preserving housing stock and increasing new residential development. Program models that are 100% publicly-funded are possible but, matched with public-private partnerships, will lead to a larger pool of financial resources for housing improvement and development.

By grounding incentives in local and regional data and aligning them with long-term growth goals, counties and the state can create tools that support the development of needed housing types. A coordinated, strategic approach ensures that incentives are targeted where they will have the greatest impact.

⇒ **2.1a Lehigh and Northampton counties can establish a Joint Housing Trust Fund for the region as a flexible financing tool that would fill gaps that the private market and traditional funding sources don't cover.**

Implementation Timeframe: Medium Term (5 years)

- A Joint Housing Trust Fund (JHTF) is a dedicated pool of money used to support housing production and preservation. Drawing from a mix of public and private funding sources, the HTF could provide gap financing for new construction, provide rehabilitation or acquisition funds for older housing stock, support community pilot programs for innovative housing solutions, partner with employers to support employer-assisted housing, and catalyze projects that support the region's infrastructure such as mixed-use and transit-oriented development projects. Professional support to establish the JHTF should come through the Lehigh County Community and Economic Development and Northampton County Community and Economic Development offices, with professional staff support from the LVPC and the Redevelopment Authority of Lehigh County.

⇒ **2.1b Lehigh and Northampton Counties can establish a Joint Revolving Loan Fund for housing projects, infrastructure, and rehabilitation.**

Implementation Timeframe: Medium Term (5 years)

- A bi-county, regional revolving loan fund (JRLF) would allow for direct and continued investment to increase housing supply and supportive infrastructure. As loans are repaid, the fund replenishes itself and can be a sustainable source of funding for future projects. Initial start-up capital can be drawn from a variety of public and private funding sources. Available federal housing programs can be supplemented with the county funding to further demonstrate a commitment to increasing housing supply. The money can also be raised by private contributions that generate tax revenue through financing new development. Additionally, partnerships with community organizations can raise philanthropic capital and financial institutions can contribute to satisfy Community Reinvestment Act obligations.

An JRLF can facilitate housing growth by focusing funding toward infrastructure improvements. A regional infrastructure bank can provide necessary gap financing to make a site development-ready and prioritize projects that closely align with regional goals. Professional support to establish the JRLF should come through the Lehigh County Community and Economic Development and Northampton County Community and Economic Development offices, with

professional staff support from the LVPC and the Redevelopment Authority of Lehigh County.

Example: Montgomery County, Maryland Housing Opportunities Commission Housing Production Fund

In Montgomery County, the Housing Opportunities Commission (HOC), who function as both a public housing authority and housing finance agency, operates a \$100 million revolving loan fund. HOC offers 5% loans covering up to 20% of construction costs, repaid at conversion to permanent financing (about every five years). By recycling capital, the fund can support roughly \$1 billion in development over 10 years, a 10:1 leverage ratio. HOC retains partial ownership in supported projects and trades profit participation to guarantee affordability: at least 30% of units are income-restricted, with 20% at or below 50% Area Median Income (AMI) and 10% at 65–70% AMI. Typical projects, such as *The Laureate* and *Lumina and Radia at Hillendale Gateway*, deliver about 300 rental units, including 100 affordable units:



The Laureate delivered 268 mixed-income units, 80 affordable, with retail, amenities, and direct access to the Washington D.C. Metro Red Line.



Lumina and Radia at Hillendale Gateway, nearing completion, will be the county's first zero-net-energy mixed-income project, providing 463 units, 54% affordable (30–80% AMI), alongside a regional transit center.

⇒ **2.1c The State, Counties and Municipalities should create redevelopment incentives for underutilized areas and provide guidance to access the tools.**

Implementation Timeframe: Medium Term (5 years)

- To stimulate reinvestment in vacant or underused properties, governments at all levels should expand and adapt incentive programs that reduce upfront redevelopment costs. The Redevelopment Authority of Lehigh County (RALC) is

well-positioned to issue bonds in support of redevelopment efforts in targeted areas for growth or revitalization. County governments should develop and distribute user-friendly guidance packages that outline eligibility and the application process to access funds. The RALC, in partnership with LVPC, Lehigh and Northampton Counties' Departments of Community and Economic Development should convene all 62 local governments to develop a collaborative approach to developing incentives.

⇒ **2.1d Municipalities, in partnership with counties and school districts, should create customized Tax Increment Financing districts to incentivize targeted development in prime areas with infrastructure challenges.**

Implementation Timeframe: Medium Term (5 years)

- In areas with strong development potential, but prohibitive upfront costs, customized Tax Increment Financing (TIF) districts can attract private investment. These site limitations can include, but are not limited to, lack of adequate infrastructure and high demolition and brownfield remediation costs. The projected future increase in property tax revenue from the new development can be used to prioritize utility upgrades, roadway improvements, site remediation or stormwater preparation. Depending on the risk tolerance of the administering body, TIFs can be structured through developer reimbursement, early-stage bonding or phased implementation.

Identification of potential TIF districts suitable for housing and mixed-use development, utility and transportation infrastructure upgrades and extension will be identified through the revision of *FutureLV: The Regional Plan* (FutureLV) and its specific development plan, the *Lehigh Valley Community and Economic Development Strategy* (LVCEDS). Both FutureLV and the LVCEDS are being researched and written between 2025-2027. Ultimately, these sister plans will provide specific guidance supporting additional housing and associated infrastructure investment locations.

⇒ **2.1e The State should create opportunity zone incentives for increased housing production in designated areas.**

Implementation Timeframe: Long Term (10 years)

- Part of the Tax Cuts and Jobs Act (2017) was the creation of Opportunity Zones that allowed capital gains on investments in designated distressed areas to be potentially deferred. This program is set to expire at the end of 2026. The Commonwealth can introduce a housing-specific opportunity zone incentive to spur development of attainable units in designated lower- and middle-income neighborhoods.

⇒ **2.1f The State, Counties, Municipalities and Community Organizations should explore the creation of regional shared-equity housing models to expand**

investment in housing supply.

Implementation Timeframe: Long Term (10 years)

- A Real Estate Investment Trust (REIT) is an investment vehicle that owns or assists in financing qualifying real estate projects. The REIT could pool funding from public agencies, philanthropic foundations, nonprofit institutions and private investors to acquire, develop, or preserve housing stock. This structure can be mission-aligned to construct more workforce housing and support the various goals and initiatives of the Lehigh Valley. Local government participation is critical to launch a REIT by providing seed funding, land contributions, tax incentives or administering the program. Professional support to establish a REIT should come through the Lehigh County Community and Economic Development and Northampton County Community and Economic Development offices, with professional staff support from the LVPC and the RALC.

⇒ **2.1g The Counties and Municipalities should expand the use of land banks and apply financing tools to acquire, hold and prepare sites for residential development.**

Implementation Timeframe: Medium Term (5 years)

- Land banks are public or quasi-public entities that can acquire and manage vacant, tax-delinquent or underutilized properties. A regional land bank could pool resources, streamline the land development process and can leverage a litany of financing tools. The Allentown Redevelopment Authority (ARA) is an existing land bank that can be used as a model. Professional support to establish the land bank should come through the Lehigh County Community and Economic Development and Northampton County Community and Economic Development offices, with professional staff support from the LVPC and the Redevelopment Authority of Lehigh County.

⇒ **2.1h Municipalities and Developers should create deed-restricted housing by offering targeted financial and regulatory benefits.**

Implementation Timeframe: Medium Term (5 years)

- Deed-restricted housing is a legal agreement that limits the resale value or rental price of a residential unit. Municipalities can play an integral role in offering financial incentives that make deed-restricted units financially feasible. Municipalities can negotiate with developers for density bonuses, tax abatements, access to public land, reduced parking requirements and relaxed design standards to make deed-restrictions more attractive and viable.

⇒ **2.1i Counties and Municipalities can pursue voluntary Payments in Lieu of Taxes agreements to fund local housing initiatives.**

Implementation Timeframe: Medium Term (5 years)

- Introducing a Payments in Lieu of Taxes (PILOT) program can group voluntary financial contributions made by our region's tax-exempt institutions and funnel them towards the construction of workforce housing and supportive infrastructure. These agreements acknowledge the public services these institutions benefit from, while respecting their nonprofit status. Tax-exempt properties can be centrally located, high-value plots of land that assist the organization in their substantial community contributions but can stunt municipal revenue by taking those pieces of land off the books for real estate taxes. By establishing a collaborative, good-faith PILOT agreement, local governments can recover public costs and reinvest into supportive housing further supporting the institutions' work.

⇒ **2.1j The State, Counties and Municipalities should create performance-based subsidy programs to award affordability outcomes.**

Implementation Timeframe: Long Term (10 years)

- The Pennsylvania Housing Finance Agency (PHFA) can act as a lead to establish outcome-driven grants or subsidies awarded upon completion of projects that meet affordability housing goals. These performance-based incentives minimize risk and could include future favorable financing or access to future project funding. This approach would encourage developers to align projects with community goals and deliver projects promptly.

2.2 Utilize State, County and Municipal programs to support housing development.

Implementation Timeframe: Short Term (1 years)

A wide array of state, county and municipal programs exist to support housing development, yet many remain underutilized due to limited awareness, complex application processes, or a lack of coordination. These programs have demonstrated their effectiveness and can use our help in promotion and advocacy. By actively aligning and promoting these programs, governments at all levels can play a direct role in enabling more housing production.

⇒ **2.2a Developers should continue to leverage existing tax abatement/incentive districts like the Neighborhood Improvement Zone and Local Economic Revitalization Tax Assistance.**

Implementation Timeframe: Short Term (1 year)

- Existing tools in the Lehigh Valley, such as the Neighborhood Improvement Zone (NIZ) and Local Economic Revitalization Tax Assistance (LERTA) programs, have demonstrated the value of targeted tax-based incentives in catalyzing development in designated areas. Developers should continue to utilize the benefits of each and continue to develop more housing supply where appropriate.

⇒ **2.2b The Counties should pursue Pennsylvania Housing Affordability and Rehabilitation Enhancement funding to support affordable housing development and preservation.**

Implementation Timeframe: Short Term (1 year)

- The Pennsylvania Housing Affordability and Rehabilitation Enhancement (PHARE) fund is annually available for Counties to apply for funding for a wide array of housing needs - like new construction and rehabilitation. Counties should partner with regional entities like the LVPC, community-based housing organizations and municipalities to maintain an updated housing needs assessment to develop a strong application for PHARE funding.

⇒ **2.2c Municipalities should strategically apply and utilize the Keystone Communities Program to revitalize aging housing stock and enhance neighborhoods.**

Implementation Timeframe: Short Term (1 year)

- The Keystone Communities Program is administered by the Pennsylvania Department of Community and Economic Development (DCED). It assists municipalities, redevelopment authorities and nonprofits in making on-the-ground improvements in housing. Eligible projects include facade improvements, infill residential development, home repairs and streetscape improvements.

⇒ **2.2d Municipalities and community organizations should leverage HOME funds for housing development and rehab.**

Implementation Timeframe: Short Term (1 years)

- The Pennsylvania HOME Investment Partnership Program funds are administered by Pennsylvania Department of Community and Economic Development (DCED) from the U.S. Department of Housing and Urban Development (HUD) to address pertinent housing challenges and needs. Municipalities and community housing organizations should work with developers to utilize the funding for projects like rehabilitating older homes, constructing new affordable units and other qualifying initiatives.

⇒ **2.2e Counties and Municipalities should collaborate with the Commonwealth to identify and promote development-ready sites through the Pennsylvania Strategic Investment to Enhance Sites (PA SITES) program to support new housing production.**

Implementation Timeframe: Medium Term (5 years)

- The Pennsylvania Department of Community and Economic Development (DCED) administers the PA SITES Program to accelerate the development of properties with high infrastructure potential. Counties and Municipalities should identify these underutilized parcels and work to pre-certify these sites by conducting due diligence (zoning confirmation, environmental review and utility availability). Adding housing-ready properties to the PA SITES database

increases visibility for developers, shortens project timelines and signals a commitment to increasing housing supply.

⇒ **2.2f The State, Counties and Municipalities should explore obtaining general obligation government-issued bonds as a gap financing tool for workforce housing development.**

Implementation Timeframe: Medium Term (5 years)

- General Obligation (GO) bonds are a powerful public financing tool backed by the full faith and credit of a government entity, allowing states, counties and municipalities to raise upfront capital for critical investments at low interest rates. By issuing GO bonds, local governments can contribute to site preparation, infrastructure, or vertical construction - particularly for mixed-income workforce housing development. To ensure fiscal responsibility, bond-funded projects should be aligned with comprehensive housing plans, include clear return-on-investment metrics (such as long-term tax base growth or rent stabilization), and be subject to public engagement and oversight.

⇒ **2.2g The State, Counties and Municipalities should consider using Green, Social and Sustainability bonds to assist in the development of sustainable workforce housing and community infrastructure to support long-term community resilience.**

Implementation Timeframe: Medium Term (5 years)

- Green, Social and Sustainability (GSS) bonds are loans our local governments can take out by selling bonds to investors and obligated towards initiatives that make communities more climate resilient. Local governments can use GSS bonds to fund the development of energy-efficient workforce housing, weatherization of aging properties, or installation of green infrastructure.

2.3 Implement financing products that support constructing a variety of housing types.

Implementation Timeframe: Medium Term (5 years)

Expanding housing supply requires innovative financing tools that reflect the variety and scale of new developments. By creating and promoting more flexible financing products tailored to different housing types and developments scales, banks, counties and state agencies can unlock new ways to address the region's housing crunch.

- **2.3a Banks should financially support alternative construction methods.**

Implementation Timeframe: Medium Term (5 years)

- Modular and prefabricated building methods offer cost and time efficiencies, but they can fall outside of traditional lending models. Modular home types face underwriting hurdles, especially for multi-family, and can benefit from more flexible lending tactics to reflect their quicker timeline. Updating lending

guidelines and risk assessments could help these nontraditional construction methods successfully secure financing.

- **2.3b Banks should tailor financial solutions to support alternative housing types.**

Implementation Timeframe: Medium Term (5 years)

- Flexible and specialized financing mechanisms for neighborhood-compatible developments like infill and small-scale properties can add gentle density while retaining community character. By tailoring lending strategies to smaller-scale residential developments and adapting underwriting criteria, lenders can reduce risk while expanding access to capital for small-scale developers. Through flexible capital and technical support, local banks can help micro developers get projects off the ground and can have a domino effect in transforming a community.

Banks can create niche loan products to fund suburban infill opportunities like ADUs, granny flats, in-law suites, or carriage homes. These special financing options can be customized to minimize lending risk while increasing opportunities for a variety of alternative housing types. This type of incremental and community-rooted growth supports the pipeline of local small-scale developers and fosters future partnerships with financial institutions.

Example: The Financing Constraints of ADUs

In 2021, UC Berkeley surveyed more than 800 California homeowners who built ADUs. Overall, 62% used liquid assets, while only 43% financed with mortgages. Among borrowers, 56% relied on Home Equity Lines of Credit (HELOC) and 34% used cash-out refinancing, which requires substantial equity and strong credit. These financing paths are prohibitive for many households. A survey by the Oregon Department of Environmental Quality in 2013 also found construction costs to be the second-largest barrier to ADU development statewide.

- **2.3c Banks should utilize Community Reinvestment Act funds for affordable housing and community development projects.**

Implementation Timeframe: Short Term (1 year)

- The Community Reinvestment Act of 1977 (CRA) requires financial institutions to meet the credit needs of the communities they serve, including low- and moderate-income neighborhoods. Instead of a bank-by-bank, scattered approach, financial institutions should align lending strategies with local housing plans, further partner with community organizations and mission-driven developers to maximize both impact and compliance with regulatory requirements. Leveraging CRA credit, bank community and foundation giving into special purpose credit products, loan pools and other financing vehicles will not only increase housing development but diversify and expand lending across reasonably expected market areas (REMA's).

- **2.3d Banks should partner to create regional housing loan pools to share risk.**

Implementation Timeframe: Medium Term (5 years)

- Banks may face concentration risk when lending to housing projects. The Lehigh Valley a single loan can represent a significant portion of a bank’s portfolio, and a small pool of developers concentrates lending. While financial institutions partner regularly to fund development, concentration risk remains for many banks. Intentional, coordinated pooled loan models would allow for financing more diverse housing developments across geographies and spread risk among the involved institutions. In addition, regular collaborative discussions among lenders on housing starts and permanent financing would be facilitated through better bank-to-bank partnerships. In addition, loan pools can support new and emerging developers, often associated with higher credit risk, by spreading lending risk across a larger group of financial institutions. Furthermore, coordinated cross-financial institution efforts enable banks of all sizes to partner. Banks regardless of scale make loans as a critical piece of their book of business. All banks can benefit from a loan pool, because everyone, regardless of size can have a seat at the table, where small banks often struggle, especially with complicated mixed-use housing developments and redevelopments, to have the capacity to lend at the scale necessary for a project to work. Loans pools, in addition, to reducing concentration risk, can be a vital tool to bridging funding developers gaps, building the newest generation of builders and diversifying lending portfolios.

- **2.4e Developers and banks should develop construction-specific funding solutions to offset the high cost of labor and materials in housing projects.**

Implementation Timeframe: Medium Term (5 years)

- To help close financing gaps, developers and banks should explore new tools that incentivize efficient development. There are creative financial tools that can be implemented that protect against raw materials price spikes and ensure a project is seen to completion. Eligible entities can procure cost-gap grant funding, contingency reserve funds and guidance from the Pennsylvania Housing Finance Agency ([PHFA](#)).

2.5 Utilize Federal funding sources to support housing development.

Implementation Timeframe: Short Term (1 year)

Federal programs offer critical funding streams that assist in expanding housing supply, improve infrastructure and support the vital work of affordable housing community organizations. Free-market constraints can limit the feasibility of delivering natural affordable housing units so leaning on the expertise of our region’s nonprofit organizations is crucial. Due to limited staff capacity, complex application requirements, or lack of coordination, many of the federal programs are underutilized.

Federal Housing Policy Momentum: H.R. 6644 – *Housing for the 21st Century Act*

Early in 2026, the U.S. House of Representatives advanced the bipartisan *Housing for the 21st Century Act* (H.R. 6644), one of the most significant federal housing reform packages in years. The bill now moves to the U.S. Senate before final enactment. If enacted, the legislation would modernize core federal housing programs, increase flexibility in the use of federal funds, streamline regulatory reviews for infill and rehabilitation projects, expand support for rural and manufactured housing, and direct federal agencies to publish best practices for zoning and housing supply frameworks. These reforms could provide meaningful new resources and incentives for county and municipal governments, developers, lenders, and other partners working to increase housing production and affordability in the Lehigh Valley. Continued advocacy and engagement with Senate deliberations will be important to ensure that final legislation supports local housing strategies and aligns with community needs.

⇒ **2.5a Developers and Municipalities should coordinate to utilize tax benefits to complete adaptive reuse projects for historic properties.**

Implementation Timeframe: Medium Term (5 years)

- The Lehigh Valley contains a rich inventory of historic industrial, commercial and institutional buildings, many of which are underutilized or vacant but structurally sound. There are strong candidates across the region for these types of projects, especially where zoning and infrastructure already support residential uses. Local governments can collaborate with developers to identify eligible sites and various tax credit programs to reduce upfront costs. The Federal Historic Tax Credit (HTC) offers incentives for redevelopment of specific historic sites of a tax credit worth 20% of the rehabilitation costs.

Example: Simon Silk Mill, Easton



The Simon Silk Mill in Easton is one of the first projects in Pennsylvania to take advantage of the state's historic tax credits, combining those with the federal tax credits to build over 150 apartments and 150,000 square feet of retail space, and improving the surrounding public infrastructure totaling \$100 million in redevelopment.

⇒ **2.5b Counties, Municipalities and Community Organizations should leverage Community Development Block Grants to support residential development in low-to moderate-income communities.**

Implementation Timeframe: Short Term (1 year)

- Community Development Block Grants (CDBG) funds are flexible funding administered by HUD to assist local governments housing needs. To access and use CDBG funding, municipalities must develop a Consolidated Plan and submit annual action plans to HUD outlining their priorities and intended uses. Eligible activities include housing rehabilitation, public infrastructure improvements, blight clearance, code enforcement and support for nonprofits providing housing or neighborhood services.

CDBG recipients can access low-cost, flexible financing through the Section 108 Loan Guarantee Program to spur new housing construction. Housing rehabilitation, public infrastructure improvements and construction of affordable housing in some circumstances are all eligible activities.

⇒ **2.5c The State, Counties and Municipalities should collaborate to provide technical assistance throughout the federal funding process and assist in securing Low-Income Housing Tax Credit with developers.**

Implementation Timeframe: Medium Term (5 years)

- Low-Income Housing Tax Credit (LIHTC) is a federal tax credit program that incentivizes residential developers to set aside a portion of units for low- and moderate-income households in exchange for a tax credit over several years. A recurring barrier of securing LIHTC funding was the burdensome application and reporting process for stakeholders. The State and Counties could assist Municipalities, who have a vested interest in administering LIHTC projects but lack capacity, by advocating standardizing the reporting process. By reducing the administrative duties, the Counties and Municipalities can ease the application process and make it easier for smaller-scale developers to access the credits.

Example: Local Progress

LIHTC has been instrumental in helping develop housing in the Lehigh Valley. From 1991 to 2025, Lehigh County projects have received over \$12.3 million in tax abatement helping create 1344 units, and Northampton County has received \$8.8 Million helping create 1238 units. LIHTC has delivered outsized funding and unit production per project, but the program's complexity has reduced the total number of projects, with only 46 awards regionally over 34 years.

- ⇒ **2.5d Counties and Rural Municipalities should pursue funding from the U.S. Department of Agriculture (USDA) Rural Housing Service to develop housing supply in eligible rural areas of the Lehigh Valley.**

Implementation Timeframe: Short Term (1 year)

- The Rural Housing Service (RHS) offers financing for multiple types of land use, including housing. Qualifying communities can tap into these resources to subsidize single-family and multi-family residential development through direct loans, loan guarantees and grants. Counties should partner with rural communities to align the development of housing with local regulations and regional goals.

- ⇒ **2.5e Counties and Municipalities should apply for HUD's Pathways to Removing Obstacles to Housing funding to reform local regulatory policies and invest in capacity-building that accelerates housing development.**

Implementation Timeframe: Short Term (1 year)

- The Pathways to Removing Obstacles to Housing (PRO-Housing) program, created by HUD, is a comprehensive grant award that can be used to address barriers to housing production. Eligible activities include updating zoning ordinances, modernizing permitting processes, investing in staffing resources and developing regional education tools.

2.6 Utilize financial tools to reduce barriers and develop pathways to homeownership.

Implementation Timeframe: Medium Term (5 years)

For first-time buyers and moderate-income families, challenges like steep down payments, limited access to credit, and a shrinking supply of starter homes have created significant barriers. But local and state agencies, along with nonprofit organizations and financial institutions, are beginning to look at new ways to turn that tide. From down payment assistance to rent-to-own models and community-based support programs, a growing coalition is working to create clearer, more affordable pathways to owning a home.

- ⇒ **2.6a The State, in partnership with Developers, Counties and Municipalities, should expand rent-to-own programs to create flexible pathways for homeownership.**

Implementation Timeframe: Medium Term (5 years)

- Rent-to-own and other homebuyer transition initiatives can offer a more flexible pathway from renting to eventual homeownership. State agencies can play the lead role in establishing programs such as traditional lease-to-purchase agreements, shared equity models or customized buyer-prep initiatives where residents can either live in or prepare to move into the home they intend to buy. Banks with more creative underwriting flexibility allow them to meet community

lending goals, support innovative housing models and consider individuals with alternative forms of creditworthiness. Community organizations and mission-aligned developers can collaborate with banks to co-design shared-risk lending models and develop homebuyer readiness programs.

2.7 Continue analysis and implementation of finance strategies to develop after-action items.

Implementation Timeframe: Short Term (1 year)

With support from our many partners, the LVPC is committed to developing data-driven strategies to support the growth of the Lehigh Valley. Each stakeholder plays a part, and this section outlines some short-term after-action items to expect.

⇒ 2.7a The LVPC should continue to guide housing growth by developing an infrastructure investment strategy.

Implementation Timeframe: Medium Term (5 years)

- The cost and availability of infrastructure - such as water, sewer, roads and stormwater management - was noted throughout our community engagement as a major obstacle to new housing development. To avoid lagging infrastructure upgrades, the Lehigh Valley should adopt a housing infrastructure investment strategy that aligns new housing development with coordinated infrastructure improvements. By coordinating infrastructure planning with housing goals, the region can ensure that the necessary foundations are in place to support more housing. In addition, the *FutureLV: The Regional Plan*, a comprehensive strategy for the Lehigh Valley's growth, development and redevelopment, the LVPC is coordinating the first Comprehensive Economic Development Strategy (CEDS) efforts in nearly two decades. A new CEDS is a hyper-targeted plan that identifies specific properties for reuse and redevelopment, matches core public and private infrastructure to support development and formally establishes measuring, monitoring and reporting structures necessary for local and county governments, utilities, redevelopment authorities, planning and economic development professionals invest in the advancing global regional goals embedded in *FutureLV*. The new Lehigh Valley CEDS is underway and expected to be completed in 2027.

⇒ 2.7b The LVPC should continue to develop economic analyses providing financial insights.

Implementation Timeframe: Short Term (1 year)

- The LVPC can investigate the costs of services and benefits that residents receive related to their housing costs. This includes an analysis of profitable land uses through the lens of property taxes and how new development can facilitate future community improvements. LVPC is uniquely qualified as the region's data and information hub, supporting governments at all levels, tracking land

development and planning for and investing in infrastructure across the region. As a trusted, neutral entity, the LVPC, houses professional economists, data scientists, engineers and planners, that implement nearly a dozen bi-county delegated state and federal statutes, including development of a plan for housing and community facilities. LVPC's commitment to consistent, quality, statistically-valid data and analytics products is beginning to expand into financial modeling, which will support housing information and better decision-making broadly.

Conclusion

The region's governments, banks, businesses, and nonprofits each have a role to play in unlocking funding opportunities that are flexible, inclusive, and grounded in the realities of today's housing challenges. Implementing these strategies will require collaboration and creativity, but the potential return is a housing system that works for more people, in more places, for years to come.

Land Use and Regulations

Zoning and the regulatory environment shape what kind of housing can be built and where it can go. While striving to accommodate additional housing, communities must also balance residential zoning with other regional goals such as preserving open space and farmland, minimizing environmental impacts, and balancing pressure on utility systems. All community types, whether rural, suburban, urban or somewhere in between, can leverage zoning regulations to encourage a development pattern that works for them.

Summary of Strategies

Strategy	Implementers
3.1 Housing approaches should align with objectives of balancing growth and preservation in <i>FutureLV: The Regional Plan</i> .	LVPC, Municipalities
3.2 Take a performance-based planning approach by using LVPC’s data tools to inform updates to local zoning ordinances and maps.	Municipalities, LVPC, Developers, LANTA
3.3 Update regulations to facilitate the reuse of vacant structures.	Municipalities, Redevelopment and Housing Authorities
3.4 Provide guidance on determining municipal ‘Fair Share’ for all land uses	State, Municipalities, LVPC
3.5 Adopt best practices utilizing educational resources provided by LVPC.	LVPC, Municipalities
3.6 Collaborate to share local resources.	Municipalities

3.1 Approaches to address the region’s housing supply and attainability must align with objectives of balancing growth and preservation in *FutureLV: The Regional Plan*.

Implementation Timeframe: Long Term (10 years)

To meet housing needs, while protecting the Lehigh Valley’s natural and agricultural resources, housing strategies must align with *FutureLV: The Regional Plan*’s vision of balanced growth and preservation. Strategic development can make the most of available land while reducing sprawl and infrastructure costs. Achieving this balance requires close collaboration between planners, developers, designers, and community leaders.

⇒ **3.1a Municipalities should identify Housing Growth Areas based on the following criteria (potential callout):**

Implementation Timeframe: Short Term (1 year)

- Infrastructure Capacity
 - Access to existing public sewer and water systems (or planned capacity expansions).
 - Adequate transportation infrastructure, including roadway connectivity and LANTA transit routes.
 - Utility availability (electricity, broadband, stormwater systems).

- Land Use Compatibility
 - Areas designated for growth or redevelopment in local comprehensive plans and *FutureLV: The Regional Plan*.
 - Sites with underutilized, vacant, or obsolete properties where redevelopment can enhance neighborhood vitality.
 - Compatibility with surrounding land uses to ensure appropriate transitions (e.g., medium-density infill adjacent to downtowns, not scattered in rural conservation zones).
- Location and Accessibility
 - Proximity to employment centers, schools, healthcare, and shopping.
 - Walkability and multimodal access, including sidewalks, trails, and transit.
 - Connectivity to major corridors and regional centers of activity.
- Market Feasibility
 - Sites where zoning changes or redevelopment incentives can realistically yield attainable housing types (missing middle, multifamily, ADUs).
 - Alignment with projected population and household growth needs through 2050.
 - Market conditions that support redevelopment (demand, financing, partnerships).

⇒ **3.1b When identifying housing growth areas, municipalities should be conscientious of community and environmental factors.**

Implementation Timeframe: Short Term (1 year)

- Avoidance of hazard-prone areas (floodplains, steep slopes).
- Minimization of environmental impacts, particularly to prime agricultural soils and preserved farmland.
- Opportunities to enhance community amenities (parks, green space, cultural anchors).

⇒ **3.1c Municipalities should enhance the housing planning elements within their comprehensive plans, downtown plans and other plans outlining a community's shared vision.**

Implementation Timeframe: Medium Term (5 years)

- Municipalities should ensure detailed and proactive housing elements are included within their comprehensive plans to identify where and how housing should be prioritized, as required by the Pennsylvania Municipalities Planning Code (Section 301.2.1).



In rural areas, crossroads villages may have factors able to accommodate contextually-appropriate housing growth, as illustrated in the Crossroads Village Concept of FutureLV: The Regional Plan.

3.2 Municipalities should take a performance-based planning approach by using LVPC’s Data tools to inform updates to local zoning ordinances and maps.

Implementation Timeframe: Medium Term (5 years)

As part of the Housing Supply and Attainability Strategy, the LVPC provides [data](#) quantifying each municipality’s unique housing needs. These tools can help municipalities assess their current ordinances and make changes that are supportive of housing production.

⇒ **3.2a Municipalities should update zoning ordinances to increase residential development within Housing Growth Areas.**

Implementation Timeframe: Medium Term (5 years)

- Suburban and urban municipalities experiencing development pressure should ensure zoning reflects actual development patterns and the capacity of the current infrastructure.

⇒ **3.2b Municipalities with Housing Growth Areas should update zoning ordinances to reduce single-family minimum lot size requirements and enable smaller lots.**

Implementation Timeframe: Medium Term (5 years)

- Many municipalities have outdated zoning codes that require large lots, which drive up housing costs, limit density and reduce walkability. By allowing smaller lots, especially in suburban and rural contexts, municipalities can enable more attainable housing options while using infrastructure more efficiently. Municipalities should adjust zoning codes to allow smaller lot sizes, reduce minimum square footage requirements, and enable flexible setbacks.

⇒ **3.2c Municipalities should update zoning ordinances to provide for appropriately scaled densities in residential zoning districts.**

Implementation Timeframe: Medium Term (5 years)

- In urban and suburban municipalities, allowing a mix of housing types supports infill development and density near jobs, services and transit.
- In rural and some areas of suburban municipalities, consider cluster development and conservation subdivisions, rather than piecemeal one-acre single family zoning that utilizes land less efficiently. Update zoning to allow village-style mixed housing types in rural centers that align with local infrastructure capacity.

⇒ **3.2d Municipalities should update zoning ordinances to provide for a range of housing types.**

Implementation Timeframe: Medium Term (5 years)

- To provide for a variety of living situations, family structures and a diversity of incomes, a mix of housing types is needed to accommodate all residents. These can be forms like twins or duplexes, townhouses, manufactured homes, ADUs, and tiny homes.
- Stakeholders identified opportunities to increase the availability of manufactured homes in the Lehigh Valley, which currently make up only 2% (5,607 units) of the region's housing supply. Prioritizing manufactured homes and prefabricated housing construction could expedite addressing housing challenges in both a timely and budget-efficient manner. Municipalities should ensure that zoning codes allow for manufactured housing in appropriate locations and support integration into mixed-income or workforce housing developments.
- Smaller homes can suit a range of needs and can serve as starter homes to overcome zoning constraints. Expand attached accessory dwelling units (ADUs). Support aging-in-place and multigenerational options. Have flexibility in zoning standards such as parking requirements, setbacks, width of the lots, availability of alley ways, lot coverage requirements to allow more ADUs to increase supply. Municipalities should update zoning and permitting processes to legalize and simplify the development of ADUs, including removing owner-occupancy requirements, easing parking mandates, and providing design templates.
- Municipalities should evaluate land use policies to enable tiny home developments at appropriate scales and in appropriate areas and explore partnerships with non-profits and housing agencies to implement tiny home villages. Supportive infrastructure and service coordination (water, sewer, transportation) should be streamlined to support deployment.

⇒ **3.2e Municipalities should update zoning ordinances to facilitate residential and mixed-use development along transit routes, especially Enhanced Bus Service routes, encouraging higher density housing along major corridors.**

Implementation Timeframe: Long Term (10 years)

- Municipalities should ensure that zoning facilitates transit-oriented development by allowing higher intensity residential development and a mix of uses within a half-mile buffer of transit stops within Housing Growth Areas.
- Municipalities, developers and employers should continue to work with LVPC and the Lehigh and Northampton Transportation Authority (LANTA) to ensure that service keeps pace with growth areas and resident needs.

⇒ **3.2f Municipalities should update zoning ordinances to reform areas zoned predominantly as commercial or office to accommodate a mix of contextually appropriate residential types.**

Implementation Timeframe: Medium Term (5 years)

- Eliminating outdated zoning standards that only accommodate one use type provides workers the opportunity to live close to where they work, maximizes the limited available land in communities and alleviates traffic on roadways.

⇒ **3.2g Municipalities should update zoning ordinances to right-size parking minimums to increase development flexibility.**

Implementation Timeframe: Medium Term (5 years)

- Lessening requirements for parking minimums ensures that land is reserved for its highest and best use and reduces project costs passed on to residents. A contextual parking standard should be implemented in urban settings so that neighborhoods have enough parking while fully utilizing all available space. Parking reductions can be tied to regional multimodal corridors to encourage development and increased public transit ridership.

Example: The high cost of structured parking

Large-scale developments in built-up areas with transit alternatives often still require costly structured parking to meet off-street requirements. A study by the Government Accountability Office found that in LIHTC projects (2011–2015), structured parking added \$56,000 per unit, often offsetting tax benefits. A 2016 study by the Center for Neighborhood Technology found underutilized parking costs \$4,200 per outdoor space and \$37,300 per indoor space, while the Sightline Institute estimated vacant parking raised rents by about 15% to recoup construction costs.

⇒ **3.2h Municipalities should update zoning ordinances to consolidate zoning districts to make the development process more straightforward and alleviate the administrative burden.**

Implementation Timeframe: Medium Term (5 years)

- Stakeholders revealed a consistent barrier to the land development process is arduous and complicated procedures can cause project delays of months or years. By simplifying zoning and other regulatory documents, it is easier for a municipality to administer and for an applicant to understand. Simplifying overly complex zoning codes that often include numerous, redundant or overly-specific

residential districts reduce confusion for developers, residents, municipal staff and can speed up the review process significantly. Using visual aids and tables can create a cohesive and readable document that lends to an expedient development process.



Suburban areas with predominantly single-family detached subdivisions can accommodate additional housing growth with a variety of types such as accessory dwelling units, twins, townhomes, and multi-family that suit community character, as illustrated in the Suburban Infill Concept of FutureLV: The Regional Plan.

3.3 Municipalities should update regulations to facilitate the adaptive reuse of vacant structures as a method of increasing housing supply.

Implementation Timeframe: Medium Term (5 years)

Numerous properties throughout the Lehigh Valley have the potential for redevelopment and residential conversions. Updating zoning codes can facilitate the redevelopment and conversion of vacant strip malls, office buildings, or outdated commercial properties into residential or mixed-use projects. These conversions may require communities to revisit their zoning to accommodate residential uses and develop tools to incentivize development.

⇒ 3.3a Brownfield Redevelopment

Implementation Timeframe: Long Term (10 years)

- Identify and inventory underutilized or abandoned industrial or commercial properties suitable for housing.
- Pursue state and federal funding (e.g., PA DEP, EPA Brownfields Program) for site assessment and remediation.
- Update zoning to allow residential or mixed-use redevelopment once remediation is complete.
- Offer incentives for cleanup and reuse, such as tax credits or liability protections.
- Partner with redevelopment authorities to assemble parcels and coordinate cleanup with new housing projects.

Example: The Waterfront, Allentown PA

The Waterfront project along the Lehigh River in Allentown remediates and redevelops a former steel manufacturing site with a variety of housing types alongside commercial, office, and recreational uses, demonstrating how brownfield redevelopment can expand housing supply, diversify housing options, and reconnect communities to environmental and economic assets.



Pictured: The first completed building of The Waterfront project.



In January 2025, the Lehigh Valley section of ULI Philadelphia toured the progress of River House, the first residential building of The Waterfront project, which includes 201 apartment units.

⇒ 3.3b Office Conversions

Implementation Timeframe: Medium Term (5 years)

- Allow residential uses by right in commercial/office zoning districts where vacancy is high.
- Encourage live/work or mixed-use models that keep ground floors active with commercial space.
- Modify dimensional standards (floor area, setbacks, parking ratios) to fit housing units into office footprints.
- Explore incentives like density bonuses, tax abatements, or waived impact fees for conversion projects.
- Target suburban office parks with obsolete buildings for potential housing.

Example: PPL Tower Office to Apartment Conversion

The PPL Tower, a 24-story building iconic to the Allentown skyline, was granted a special exception request by the Allentown Zoning Hearing Board to convert the former office building into mixed-use residential.



Pictured: PPL Tower, Wikipedia

⇒ **3.3c Legacy Commercial / Strip Mall Redevelopment**

Implementation Timeframe: Long Term (10 years)

- Permit partial or full conversion of vacant retail into housing, often in tandem with neighborhood-serving retail.
- Rezone aging commercial corridors for mixed-use redevelopment with residential above ground-floor shops.
- Reduce parking minimums to unlock excess lot area for infill housing.
- Incentivize redevelopment with flexible design standards that allow townhomes, apartments, or senior housing.
- Work with property owners to phase redevelopment while maintaining viable retail anchors.

Example: *FutureLV: The Regional Plan Whitehall Mall Redevelopment Concept*

FutureLV: The Regional Plan conceptualizes redevelopment of the Whitehall Mall in Whitehall Township, PA, at MacArthur Road and Grape Street. Many similar shopping malls are changing as the retail economy evolves, creating opportunities for reuse and redevelopment such as residential, which would provide housing opportunities in proximity to jobs and commercial uses while supporting further investments in bicycle, pedestrian and transit infrastructure, stabilizing the tax base and meeting new market demands.



Pictured: Rendering by PennPraxis conceptualizing redevelopment of Whitehall Mall

⇒ 3.3d Rehabilitation and Weatherization

Implementation Timeframe: Short Term (1 year)

- Support programs that repair and upgrade older housing stock to extend usability and affordability.
 - Establish local housing rehabilitation grant or loan programs to bring vacant homes back online.
- Support code updates that make small-scale rehab and accessory dwelling units (ADUs) easier.
- Partner with state and federal weatherization programs to improve energy efficiency, especially for low-and moderate-income households.
- **CALLOUT:** Partner with organizations such as Community Action Lehigh Valley who provide weatherization services to Lehigh Valley communities (<https://www.communityactionlv.org/weatherization>).

3.4 Advocate for state-level guidance on determining ‘Fair Share’ for all land uses.

Implementation Timeframe: Long Term (10 years)

Rooted in the Pennsylvania Municipalities Planning Code (MPC), municipalities are legally required to allow a diverse range of housing types through their zoning ordinances. The Fair Share Doctrine aims to prevent exclusionary zoning practices that restrict housing options and access. Without state-level direction, municipalities may avoid planning for certain housing types, resulting in fragmented development patterns across the region and opening them up to legal challenges. Fair share guidance would help municipalities align zoning, land use, and housing goals with regional demand. This would also reduce legal risk, improve regional coordination, and promote compliance

with constitutional housing obligations and fair housing laws. Municipalities can use the [Housing Dashboard tool](#) to evaluate the quantity of each housing type within their jurisdiction.

Conclusion

The region's regulatory framework can act as a catalyst for housing production as the Lehigh Valley grows. Managing and maintaining zoning ordinance and subdivision and land development ordinance documents are key responsibilities for municipalities to continue to adapt to market conditions and housing needs. Through intentional regulation, communities can balance additional housing with preservation goals to support a growing tax base and healthier workforce.

Collaboration and Partnership

No one sector or industry can solve the housing crisis alone. Effective collaboration is essential to achieve the region’s housing goals. This section outlines strategies that open and maintain lines of communication across industries, facilitate the goals outlined in previous sections, and establish long-term partnerships with housing as a common goal.

Summary of Strategies

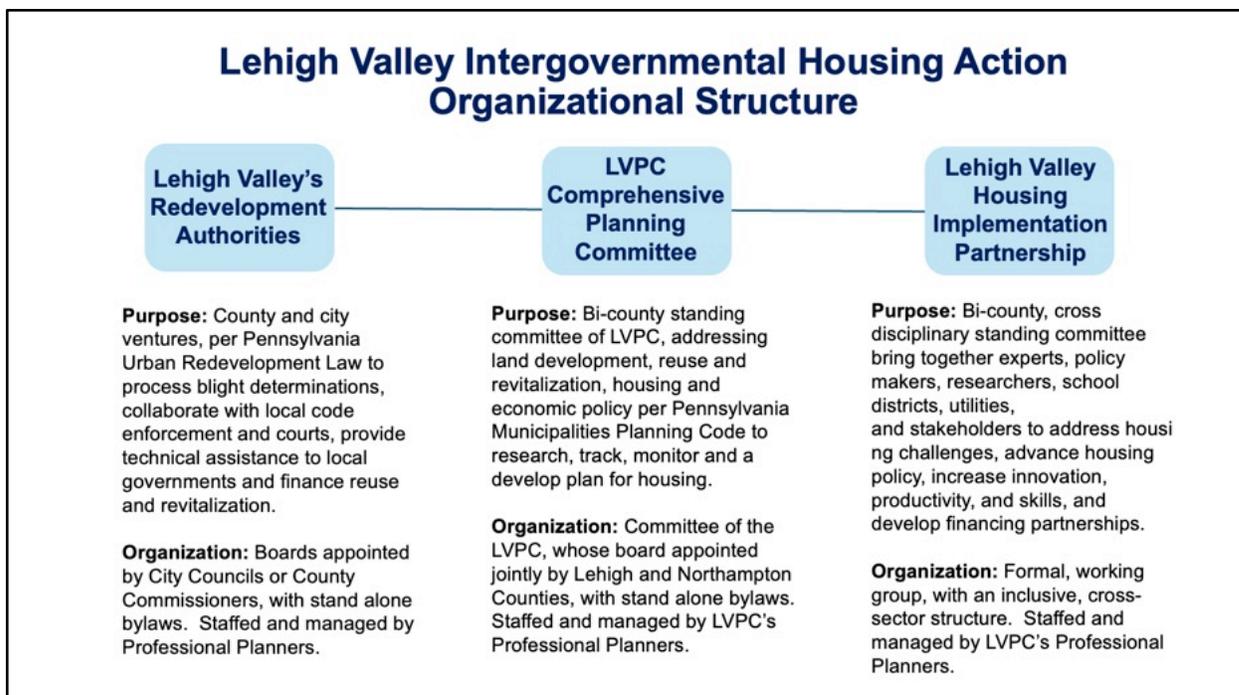
Strategy	Implementers
4.1 Coordinate regional housing and redevelopment efforts through an intergovernmental housing action framework.	All Partners
4.2 Continue to provide the region with quality data and analysis that informs policy decision-making.	LVPC
4.3 Support existing developers and attract residential developers to the region.	Banks and Developers
4.4 Collaborate to provide education and training for small-scale developers in the community.	Municipalities, Counties, LVPC, Workforce Board, Community Organizations
4.5 Leverage available land for development and redevelopment opportunities.	Institutions, Employers, Public and Private Entities
4.6 Foster support for housing by promoting public education with a unified regional voice and messaging.	All Partners
4.7 Minimize the number of student-occupied housing units that could otherwise be available to the public.	Colleges and Universities

4.1 Coordinate Regional Housing and Redevelopment Efforts Through an Intergovernmental Housing Action Framework.

Implementation Timeframe: Short Term (1 year)

Housing issues do not begin or end at municipal or county boundaries. The Lehigh Valley functions as a single housing and labor market, and as employment and population continue to increase, the need for coordinated, region-wide housing solutions becomes more urgent. Stakeholder engagement consistently identified a shared need across local governments, developers, financial institutions and community organizations for a more coordinated and less fragmented approach to identifying and advancing the redevelopment of vacant, blighted and underutilized properties. While the desire and capacity to act exists across sectors, efforts are often fragmented across jurisdictions, limiting the region’s ability to fully leverage available tools, funding and expertise.

The Lehigh Valley Intergovernmental Housing Action Organizational Structure provides a framework to align efforts, share resources and collectively advance redevelopment and housing production goals. This approach strengthens regional coordination among existing redevelopment authorities, counties, municipalities and partners through a formalized intergovernmental structure:



⇒ **4.1a Establish a Formal Regional Redevelopment Coordination Partnership.**

Implementation Timeframe: Short Term (1 years)

- Lehigh and Northampton Counties, in partnership with the LVPC, existing redevelopment authorities, and municipal partners, should formalize a regional redevelopment coordination partnership as part of the Housing Action Organizational Structure. This partnership can:
 - Convene regularly to align redevelopment priorities across the region;
 - Create and maintain a shared inventory of vacant, blighted and underutilized properties;
 - Coordinate technical assistance to municipalities, including code enforcement and redevelopment planning;
 - Align funding strategies, including public financing tools, grants and private capital;
 - Support capacity-building for existing redevelopment authorities, including staffing, technical expertise and program delivery; and
 - Track and report on redevelopment progress and housing outcomes.
- Lehigh County has taken steps to reestablish and strengthen its redevelopment authority, and Northampton County has explored similar efforts through its blight planning initiatives. These efforts demonstrate both the need and opportunity to enhance redevelopment capacity. Through a coordinated regional framework, these existing entities can be strengthened and aligned, allowing each to operate more effectively while contributing to shared regional housing goals.

4.2 The LVPC should continue to provide the region with quality data and analysis that informs regional understanding of housing issues and decision-making.

Implementation Timeframe: Short Term / Continuous (1 year)

The LVPC plays a central role in providing high-quality, objective data that supports informed housing policy and planning across the region. As a recognized expert in U.S. Census data and regional demographic trends, LVPC equips decision-makers with the tools they need to understand current conditions, anticipate future needs, and craft effective solutions. Continuing to maintain and expand these data offerings is essential to ensure that housing strategies remain grounded in fact and are responsive to the evolving needs of the Lehigh Valley. The data and analysis produced by the Lehigh Valley Housing Supply and Attainability Strategy can be found at lvpc.org/housing.

- **4.1a School Districts should enhance budget and enrollment planning with up-to-date housing and population data.**

Implementation Timeframe: Short Term (1 year)

- Data analysis can address resistance to housing by quantifying the estimated amount of student growth from generated by different housing types. School districts can also leverage the LVPC's data analysis on population and housing needs to project school enrollment numbers and inform better decision making.
- School districts can work with realtors to better understand the impact of market rate housing, the number of enrolled students, and the demographics of home renters and buyers in each jurisdiction to determine where more investment in school expansion should occur.



In June 2025, the LVPC received an award from the National Association of Regional Councils for the Lehigh Valley Housing Dashboard and Data Access developed through the Lehigh Valley Housing Supply and Attainability Strategy process.

4.3 Banks and Financial Institutions should attract residential developers to the region by facilitating introductions and matchmaking between developers and lending opportunities within the Lehigh Valley market.

Implementation Timeframe: Short Term (1 year)

Financial lending institutions can diversify the number of developers they loan money to by attracting individuals that are interested in investing in the Lehigh Valley. A public roster of bank-approved developers and builders would also help municipalities, nonprofits, and partners identify viable development teams for joint projects.

4.4 Local governments, LVPC, Workforce Board Lehigh Valley, planners, and the Counties should collaborate with banks and existing developers to provide education and training for small-scale developers in the community.

Implementation Timeframe: Medium Term (5 years)

- **4.4a To support local developers, the LVPC, professional associations, municipalities, realtors and financial lenders should provide technical assistance to enhance residential building capacity.**

Implementation Timeframe: Medium Term (5 years)

- A revolving equivalent of the TAP held in March 2025 could regularly convene a multidisciplinary panel of housing practitioners to address key issues.
 - The LVPC can continue expanding the [Lehigh Valley Government Academy](#) to educate and empower community members to get involved in planning, development and construction industries and become more informed about local decision making around housing.
 - **EXAMPLE:** Financial institutions and community organizations can implement training programs like [The Austin Small Developer Training Program](#) in Austin, Texas. Funded by the Austin Housing Finance Corporation, the program offers a unique opportunity for small-scale developers to play a larger role in addressing the region's housing challenges. It provides essential resources, such as a free four-month training course, technical assistance, mentorship, and networking.
- **4.4b The Workforce Board Lehigh Valley and technical schools, colleges, and universities should leverage existing educational and workforce development programs to promote careers in residential building and trades.**

Implementation Timeframe: Medium Term (5 years)

- These entities should leverage workforce development programs that promote careers in residential building and trades. To maximize impact, they can create partnerships with local developers for students to secure work experiences that

lead to jobs.

Example: Training Partnerships

- The Waterloo City Council partnered with Hawkeye Community College (IA) to facilitate hands-on learning for students enrolled in its [Sustainable Construction and Design program](#) as part of the city's 2030 Vision Plan. By selling vacant lots for \$1 and allocating funds for labor and materials, the City Council enables students to gain practical experience while addressing the shortage of affordable housing and rebuilding the community. The sale of these vacant lots also works to eliminate blight, invest in older neighborhoods and train the future workforce for housing infill projects. Local contractors donated labor and materials.
- The Lehigh Valley is home to several prestigious educational institutions that provide young people direct exposure to the current housing crisis. Through urban planning courses at colleges and universities and career readiness pathways, there are multiple ways for those entering the workforce to understand and help solve the challenges they've inherited. These programs provide valuable hands-on experience. For example,

Example: Lehigh University Small Cities Lab

Lehigh University's Small Cities Lab combines urban planning and architecture to construct accessory dwelling units in the City of Bethlehem, supporting and developing more guidance can help get ahead of future issues and invites innovative solutions.

4.5 Leverage available land for development and redevelopment opportunities.

Implementation Timeframe: Long Term (10 years)

Institutions such as churches, universities, hospitals, public schools, and large employers have land holdings that can be leveraged for public/private partnerships. Community organizations, schools, and employers can jumpstart this process and work with banks and lenders to find creative financing and match with reputable developers and work with municipalities to navigate zoning for requirements.

- **4.5a Developers and Employers should work with municipalities to explore ways to create workforce-supportive housing in and around job centers.**

Implementation Timeframe: Medium Term (5 years)

- Municipalities and large employers such as warehouses, health systems, and universities can collaborate to develop housing options for workers near employment sites. Employers' large landholdings can be used to build housing for their workers.

- The lack of attainable housing near our region's largest job centers exacerbates local costs by encouraging sprawl and increased commuting burdens. Employers and anchor institutions play a meaningful role in addressing housing shortages and can offer land, low-interest loans to housing developers or create employer-assisted housing programs to increase the overall supply of workforce housing.

4.6 Everyone should foster support for housing by promoting public education with a unified voice and messaging.

Implementation Timeframe: Medium Term (5 years)

All stakeholders should provide a clear message through public education to combat pervasive anti-development sentiment and combat misinformation, specifying what role each industry can play in the market and why and how housing matters to everyone. However, together a dynamic cross-sector public-education campaign can and will led to better outcomes on one of the most pressing issues of our time.

- **4.6a The LVPC can facilitate a “Zoning for the Future” Educational Campaign**

Implementation Timeframe: Short Term (1 year)

- Offering zoning training for local officials supports housing directly by improving decision-making, reducing delays in the approval processes, and increasing understanding of how zoning shapes housing outcomes. When decision makers understand how zoning regulations affect housing supply, affordability and fair housing compliance, they’re better equipped to handle ordinance updates, review development proposals fairly, and avoid unintended barriers to housing.
- Campaign messaging can include:
 - Promoting the need for housing based on each generation’s housing needs as they move through life stages.
 - Demystifying density and education on the benefits of new development using visuals, local stories, and real examples.
 - Emphasize that good zoning is pursuant to other regional goals like open-space preservation.

- **4.6b Employers and institutions should take a stronger and louder stance as marketers for tackling the housing shortage.**

Implementation Timeframe: Short Term (1 year)

- Large employers (warehouses, colleges/universities, school districts) can leverage community trust. Pro-housing messaging can be more powerful coming from a non-government agency.

- **4.6c Local governments should elevate the role of intentional housing development in achieving other regional goals.**

Implementation Timeframe: Medium Term (5 years)

- Many stakeholders cited the need to preserve open space and farmland as a challenge for developers. Coalition partners and municipalities can educate communities about smart growth, responsible land use, and the importance of housing density as a method of maintaining open space – particularly in suburban areas with limited remaining open space and in rural areas experiencing growth pressures.

⇒ **4.6d The LVPC, Counties and Community Organizations should host community visioning workshops to build consensus and get people excited about the benefits of density.**

Implementation Timeframe: Short Term (1 year)

- Develop citizen planning programs to educate and empower community members to get involved in local decision-making around housing. The LVPC can help assemble and develop materials.
- **4.6e The LVPC should continue to convene the region around attainable housing issues and promote the Housing Strategy.**

Implementation Timeframe: Short Term (1 year)

- The LVPC, municipalities, and state and county governments should continue momentum from the Lehigh Valley Housing Supply and Attainability Strategy to build professional capacity and continue collaboration across local governments and community partners. This ongoing dialogue would establish a sense of accountability and stewardship among partners to make measurable progress towards meeting closing the region’s housing gaps.
- The Lehigh Valley General Assembly, a regional body with representatives from Lehigh Valley’s municipalities, school districts and legislative offices, meets biannually and could be an appropriate venue to regularly track and update progress on addressing housing in local jurisdictions.



Hundreds of stakeholders participated in the Lehigh Valley Housing Supply and Attainability Strategy engagement process.

4.7 Colleges and Universities should work to minimize the number of housing units occupied by students.

Implementation Timeframe: Long Term (10 years)

Colleges and universities should discourage off-campus student housing by providing housing in high-density buildings like residence halls and/or university-owned apartment buildings within existing campus boundaries, rather than allowing students to sprawl into surrounding local neighborhoods with four to five students in a single-family home.

Conclusion

These strategies provide a framework for advancing shared housing objectives through coordinated action across sectors. By aligning community policies, private investment, and regional resources, the Lehigh Valley can begin addressing its estimated 9,000-unit housing shortfall in a structured and measurable way. Establishing durable partnerships now will help position the region to respond effectively to future housing demand as population and employment trends evolve. A collaborative approach ensures that a range of perspectives informs decision-making and supports balanced, sustainable growth across communities.

Summary

The Lehigh Valley Housing Supply and Attainability Strategy represents a shared commitment to ensuring that every resident has access to a safe, attainable home. The data is clear: the region faces both an immediate housing shortage and long-term pressures that will intensify as the population grows. Yet throughout this process, stakeholders from every sector, including municipal leaders, developers, lenders, employers, community organizations, and residents, have demonstrated that there is unity behind a common goal, and working together led to the development of practical, forward-looking solutions.

This plan is not the end of the conversation, but the beginning of a sustained regional effort. The strategies outlined here are designed to be adaptable and achievable, offering pathways for communities of all sizes and capacities to take action. Whether it is streamlining development processes, aligning zoning with community goals, investing in infrastructure, supporting small-scale builders, or exploring new financing tools, each step forward contributes to a stronger housing future.

Now is the time to act. Municipalities can begin by reviewing their zoning ordinances and development review processes. Counties can continue to champion funding and partnerships that unlock housing opportunities. Employers and institutions can explore ways to support housing close to jobs and campuses. Banks and lenders can innovate with new financial products, and community organizations can continue to elevate the voices of residents.

Addressing the region's housing gap will require coordinated effort across public, private, and nonprofit partners. No single organization has the tools to resolve the challenge independently, but shared responsibility and aligned action can produce measurable progress. By advancing these strategies collaboratively and deliberately, the Lehigh Valley can strengthen housing availability and support long-term economic and community stability.

Appendices

Appendix 1: ULI Technical Assistance Panelists

- Chair: Michael Kimmey, Senior Associate, LRK
- Somer Cross, Chief of Housing, Montgomery County (MD) Government
- Joseph DiGiorgi, Managing Director, Berkadia
- Jason Duckworth, President, Arcadia Land Company
- Shannon Norman, Principal Planner, City of Indianapolis
- KaMan Skinner, Senior Project Manager, Core States Group
- Kristina Vagen, Regional Vice President, The Michaels Organization

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- Sheila Alvarado
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- Steve Bachman
- Cheryl Baker
- Alisa Baratta
- Craig Beavers
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- Sherri Binder
- Amy Boccadoro
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- Tyler Martin
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- Samantha McLean
- Ingrid Melendez
- Robert Melosky
- Jamie Merida
- BJ Metz, Jr.

- Robert Meulmeester
- Eric Miller
- Rick Molchany
- Kevin Moran
- Tori Morgan
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- Marc Rittle
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- Tim Tepes
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- Chuck Weiss
- Robert Whartenby
- Jill Wheeler
- John Wichner
- Ben Willis
- Joseph Wittman
- David Wong
- Amy Wood
- Jeffrey Zettlemyer

Appendix 3: Acknowledgements by ULI

On behalf of ULI Philadelphia, the panel would like to thank the sponsor organization, the Lehigh Valley Planning Commission, for this effort.

In particular, the panel would like to thank LVPC's Executive Director Becky Bradley, Chief Community and Regional Planner Jill Seitz, Regional Planner Joey Dotta, Lehigh University Community Fellow Mary Grace Collins, and Director of Development Samantha Pearson for working closely with ULI Philadelphia staff in preparing for and hosting the panel.

The panel would also like to thank the local housing experts, elected officials, consultants, nonprofit community leaders, school district officials, local employers, realtors, developers, lenders, engineers, architects, planners, municipality representatives, internal staff, and other stakeholders for sharing their insights and perspectives during the interview sessions.

This document was inspired by the Housing Accelerator Playbook published in 2024 in partnership between the American Planning Association (APA) and National League of Cities (NLC). This document was a national-level guiding framework throughout the LVPC's public engagement and writing process.

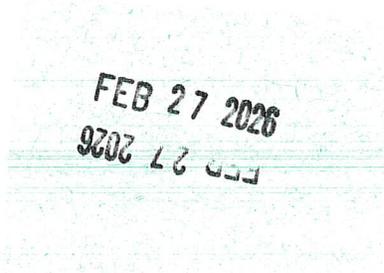
Appendix 4: Additional Resources

- [ULI: Reshaping the City: Zoning Reform for Health, Sustainability, and Resilience](#)
- [South Bend Indiana Neighborhood Infill Guide](#)
- [National League of Cities Housing Supply Accelerator Playbook](#)
- [LVPC Employment and Population Projections](#)

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February 23, 2026

Lehigh Valley Planning Commission
615 Waterfront Drive, Suite 201
Allentown, PA 18102

ATTN: Becky A. Bradley,
Executive Director

RE: Federal Government Compliance with Local Regulations

Dear Becky:

This will serve to respond to your recent inquiry pertaining to whether the federal government is required to follow local Zoning Regulations, Subdivision and Land Development Regulations, or Building Code Regulations.

Federal and State Courts have consistently held that the Constitution provides that the laws of the United States, under which federal activities are undertaken, are “the supreme law of the land,” arising out of Article VI, Clause 2, the Supremacy Clause of the Constitution which provides that “this Constitution, and the laws of the United States which shall be made in pursuance thereof, and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land, and the judges in every state shall be bound thereby, any thing in the Constitution or laws of any state to the contrary notwithstanding.” It is a “seminal principle” of law that the United States Constitution and the laws made pursuant to it are supreme.

A series of United States Supreme Court cases have held that the United States Constitution and the laws made pursuant to it are supreme. “It is the very essence of supremacy to remove all obstacles to its action within its own sphere, and so to modify every power vested in subordinate governments, as to exempt it from its own operations from their influence.” Sovereign immunity means that where “Congress does not affirmatively declare its instrumentalities or property subject to regulation, ‘the federal function must be left free’ of regulation.” *Hancock vs. Train*, 426 U.S. 167, *McCulloch vs. Maryland*, 4 Wheat. 316 (1819), and *Mayo vs. United States*, 319 U.S. 441.

The United States Code, 40 USC Section 619, provides as follows:

In carrying out its federal functions, neither the United States nor its agencies are subject to state or local regulations absent a clear statutory waiver to the contrary. This concept is based upon the Supremacy Clause of the United States Constitution which states, in part, that it, and the laws of the United States are the “supreme law of the land.”

The above principle has been applied to post offices, the National Park Service and other land management agencies, and more recently ICE private detention facilities in California (*United States of America and the GEO Group, Inc. vs. Gavin Newsom*).

Simply, the United States is not subject to state or local laws unless Congress has made explicit provision in legislation. Note that this legal principle applies whether the government actually owns the property or leases it for a federal use.

Preemption applies unless waived. Therefore, Zoning, SALDO, Building, and other County or Municipal Ordinances/Regulations are unenforceable.

The United States may be subject to state and local laws and penalties where federal law has waived its sovereign immunity, such waivers may be found in: Clean Water Act (33 USC 1323), Clean Air Act (42 USC 7418), Underground Storage Tank Act (42 USC 6991f), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9620), Safe Drinking Water Act (42 USC 300j-6(a)), and Resource Conservation and Recovery Act (RCRA) (42 USC 6961).

So if local municipalities may not regulate federal activities via Zoning, SALDO, or Building Code Regulations, are they rendered impotent in efforts to protect their citizens’ health, safety, and welfare? The answer to that question is a simple “no.” By using the very statutes and regulations promulgated thereunder regulating federal government activities as well as the federal laws wherein sovereign immunity has been waived, scrutiny of the activities and litigation to

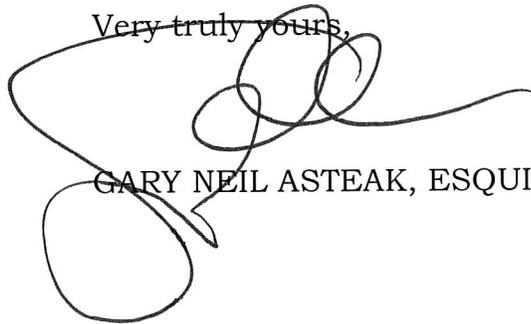
Lehigh Valley Planning Commission
February 23, 2026
Page Three

enforce those statutes and regulations are available. Administrative Appeals and/or federal litigation are the path. The State may have more tools in its toolbox than municipalities but municipalities may seek, when necessary, the Commonwealth's authority to enforce federal legislation.

Remember, many of us Municipal Solicitors have had to deal with federal agencies, i.e. post offices, Social Security offices, etc. Most have been willing to work with us but at other times not, and ultimately we have been required to be creative in our approach to these issues.

Feel free to follow up if you wish.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gary Neil Astreak". The signature is fluid and cursive, with several loops and a long horizontal stroke extending to the right.

GARY NEIL ASTEAK, ESQUIRE

GNA:dym

Project Review Summary Sheet

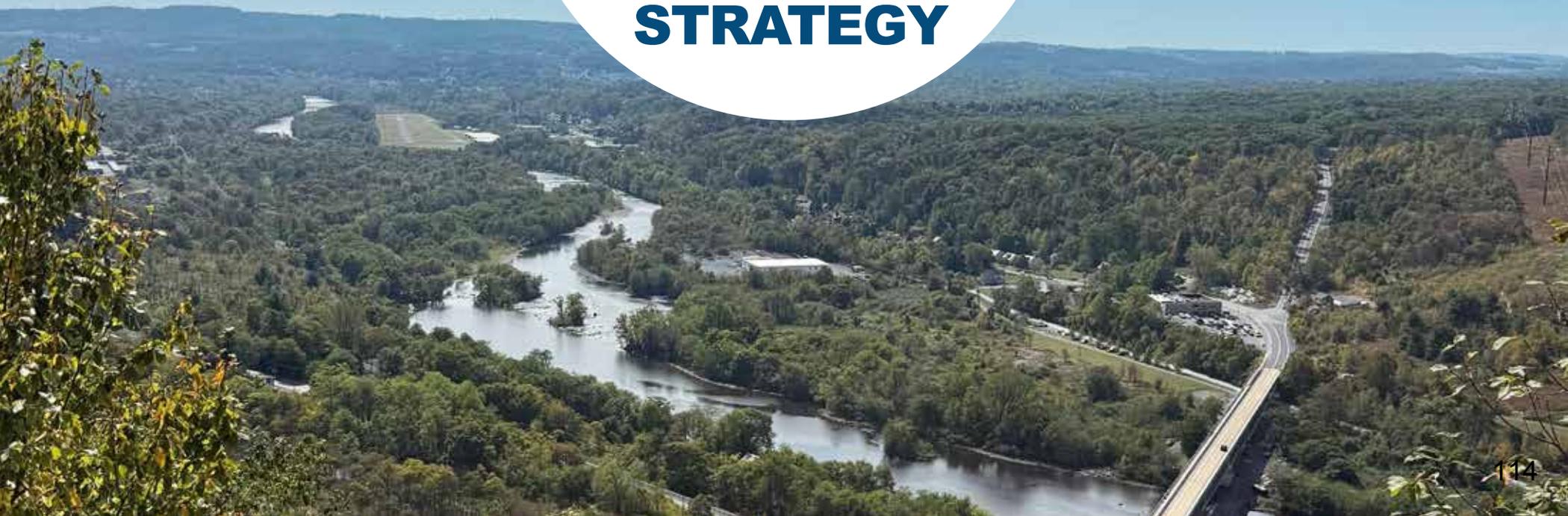
Environment Committee

Date: March 2026

Project	Municipality	Brief Statement of Purpose	LVPC Comment
<p>Review of the Bushkill Creek Greenway Master Plan</p>	<p>Palmer Township (with connections to Tatamy Borough, Forks Township and the City of Easton)</p>	<p>The Bushkill Creek Greenway Master Plan establishes a connected network of trails & public spaces as a cohesive greenway, introduces several accessibility upgrades for parks & trails and embraces improvements to ecological and hydrological systems that can protect the Bushkill Creek from the expected impacts of climate change. The Greenway is primarily located in Palmer Township, with connections to communities of Tatamy Borough, Forks Township and the City of Easton. It is considered part of the Two Rivers Trailway and the September 11th National Memorial Trail and is a link within the Delaware & Lehigh National Heritage Corridor. This Master Plan includes several recommendations throughout the document that center around 5 primary goals:</p> <ul style="list-style-type: none"> • Communicate History. “Communicate local, historical and cultural significance.” • Support Connection. “Demonstrate exemplary accessibility, support trail system changes.” • Enhance Activity. “Update facilities, multi-user recreation experience.” • Protect and Restore Ecology. “Protect habitat and enhance resilience.” <ul style="list-style-type: none"> • Create Resilient Hydrology. “Mitigate flooding.” 	<p>The Plan is a critical, community driven tool to provide and enhance access to contiguous parks and recreational opportunities for a variety of people in a physically and financially sustainable manner in Palmer Township, aligning with the Township’s comprehensive plan, <i>Northampton County Livable Landscapes, Walk/RollLV- Active Transportation Plan</i> and <i>FutureLV: The Regional Plan</i>. Including FutureLV Policies 3.2 and 5.3 and Northampton County Livable Landscapes Goals 1, 2,5 and 6. The LVPC continues to be available as a resource to assist in the implementation process.</p>



LEHIGH VALLEY
**TRAIL
CONNECTION
STRATEGY**



Published March 2026

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**The City of Bethlehem resides within Lehigh and Northampton counties*

Thank you to all 2025 LVPC Commissioners, Richard Molchany (alt.), Percy Dougherty, PhD, Bob Elbich, Dennis Klusaritz, Diane Kelly, Owen O’Neil, Lamont G. McClure, Jr., Jean Versteeg, John Gallagher, Rachel Leon, Scott Minnich, Edward Nelson, Crystal Rose, Jessica Cope, Kenneth Kraft, Basel Yandem, Darlene Heller and Tina Smith



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Introduction



People across the Lehigh Valley consistently list trails among the region's greatest assets, but successfully closing gaps in the trail network is complex and often takes many years to complete. It can require alignment among multiple stakeholders throughout the Lehigh Valley including municipalities, county agencies, state agencies, nonprofit organizations, and private partners.

Projects must comply with local, state and federal regulations, in many cases while intersecting with waterways, transportation corridors and environmentally sensitive areas. Securing funds for design, land acquisition and construction can also be a lengthy and expensive process.

Even with the many obstacles, significant progress has been made across the region since the 2013 inventory was completed.

Many of the gaps identified at the time have moved closer to closure through successful grant funding, planning efforts and construction of trail segments within the gaps. These accomplishments reflect a decade of coordinated work between regional partners and demonstrates the continued commitment to building a more connected and accessible trail network throughout the Lehigh Valley. This section highlights those original gaps and explains the work that has been done.

Trails are more than lines on a map or paths along our rivers and streams — they're how a region breathes. They give people a safe, simple way to move, connect and slow down, whether that's a morning bike commute to work, an evening walk, or a weekend escape into green space.

A strong trail network knits communities together, connects us to neighbors, supports public health and local economies, and turns open space into shared places, making a region not just easier to get around, but better to live in. Beyond recreation and mobility, trails also function as resilient infrastructure that supports ecological integrity and hazard mitigation.

In the Lehigh Valley, they are what people say they like best about living here.

For the importance of trails to our mobility, health and economy, the Lehigh Valley Planning Commission has created an inventory of existing, planned and future trail infrastructure in the Lehigh Valley. This information helps identify trail infrastructure gaps, benchmark them against regional goals and prioritize how those gaps can be closed. This report and analysis translates regional goals, shown in municipal plans across the Lehigh Valley and regional plans such as *FutureLV: The Regional Plan*, *WalkRollLV: Active Transportation Plan*, and *Livable Landscapes* into actionable locations, where the network fails to function as a true continuous system, and gives stakeholders a roadmap for fixing it.

In addition to this report, there is a complimentary interactive mapping tool at lvpc.org, that has been designed to coordinate the regional trail system and track gap closures, setting the stage for organized implementation across the region. The previous iteration of this report, the *Lehigh Valley Trails Inventory*, was completed in 2013, and many changes have occurred since then as this region grows, develops and evolves.

This report provides up-to-date trail data, which will inform regional stakeholders about the status of trail infrastructure and further support the build out of the regional trail network. This effort supports other active transportation initiatives throughout the Lehigh Valley for both commuter and recreational options. Municipalities and trail partners can use information included in this document to support funding applications for trail improvements.





Trail Development Update



Closing trail gaps is a complicated and intentional process that requires partnerships, funding, organization and patience. Trails cross many properties involving sometimes dozens of owners, all of whom need to agree to the addition of a recreational facility to their land or to sell it to a government agency or conservancy. Once property is acquired, investigation for contamination, threatened and endangered species, flood plains, steep slopes and other natural and manmade considerations must occur. Any protections for the community and plants, soil, water and wildlife are important to balancing recreational and natural assets, including people.

Resource identification is followed by engineering and approvals prior to any remediation or construction. With limited, but very important, grants available for trail projects, timelines to close important gaps can take decades. Fortunately, the Lehigh Valley has a multitude of deep, long-term partnerships that have resulted in more than 300 miles of trails we enjoy today. While much remains to be done, progress has been made since the Lehigh Valley Trail Inventory – 2013.

A special thanks to every dedicated, thoughtful and persistent trail advocate who has and continues to work toward a seamless regionwide and multiregional trail system.

The last trail gap analysis by the LVPC was completed in 2013 with the publishing of the *Lehigh Valley Trails Inventory – 2013 Lehigh and Northampton Counties*.

The following trails were identified in the 2013 Inventory as the Top Ten gaps in the region at that time. It is important to note that while some of these trail gaps remain, an incredible amount of work has been completed to move to closure, including many successes in receiving funding and building new infrastructure to help address these gaps.

2013 Top Trail Gaps

Trail Gap 1: Cedar Creek Trail to Little Lehigh Parkway Path
Trail Gap 2: Jordan Creek Greenway Trail
Trail Gap 3: D&L Trail to Ironton Rail Trail
Trail Gap 4: Nor-Bath Trail to Delaware & Lehigh Trail
Trail Gap 5: D&L Trail Environmental Obstructions
Trail Gap 6: D&L Trail – Dauphin and Bradford Streets Share the Road
Trail Gap 7: South Bethlehem Greenway Trail to Saucon Rail Trail
Trail Gap 8: Karl Stirner Arts Trail to Palmer Township Bike Path
Trail Gap 9: Tatamy Rail Trail to Jacobsburg Environmental Education Center (JEEC)
Trail Gap 10: Bushkill Township PPL Trail to Appalachian Trail





Cedar Creek Trail / Photo credit: LVPC

Trail Gap 1: Cedar Creek Trail to Little Lehigh Parkway Path

Municipalities: City of Allentown, Salisbury Township

Start: Little Lehigh Parkway Path at Kline’s Bridge, Allentown

End: Cedar Beach Trail at Hamilton Street, Allentown

Status update: This gap has been identified by the City of Allentown as phase two of the Martin Luther King Jr. (MLK) Drive Trail extension project. As of 2026, the design and engineering for phase two of the trail gap closure project is out for bid. Phase one construction, between the Little Lehigh Parkway Path and Fountain Park, is underway, and the two phases together will create continuous trail from the Cedar Creek Trail at Hamilton Street to the MLK Drive trailhead at South 4th Street.



Jordan Creek Greenway
Photo credit: LVPC

Trail Gap 2: Jordan Creek Greenway Trail

Municipalities: City of Allentown, Lowhill Township, North Whitehall Township, South Whitehall Township, Whitehall Township

Start: Gordon Street at Jordan Meadows Park, Allentown

End: Jordan Road at Trexler Nature Preserve, Lowhill Township

Status update: New trail has been constructed in multiple areas since 2013. Continuous trail has been constructed from MacArthur Road to Mauch Chunk Road. There has been new trail construction on both the east and west sides of Covered Bridge Park in South Whitehall Township, and there is a segment of trail that now runs from Lapp Road to Route 309, through Covered Bridge Park. Trail gaps remain on the Jordan Creek Greenway, from Mauch Chunk Road to Lapp Road, and from Route 309 to Trexler Nature Preserve.



Ironton Railtrail / Photo credit: LVPC

Trail Gap 3: D&L Trail to Ironton Rail Trail

Municipalities: Coplay Borough, Whitehall Township

Start: D&L Trail at Cementon Trailhead, Whitehall Township

End: Ironton Rail Trail at Saylor Park, Coplay Borough

Status update: Since the last plan, Lehigh County has continued to have discussions with Norfolk Southern, the entity that owns the rights-of-way needed for trail construction. The County is raising additional funds to be able to purchase the land.



Nor-Bath Trail / Photo credit: LVPC

Trail Gap 4: Nor-Bath Trail to Delaware & Lehigh Trail

Municipalities: Northampton Borough

Start: Clear Springs Drive, Northampton Borough

End: D&L Trail at Northampton Canal, Northampton Borough

Status update: The proposed alignment of the trail connection has been changed and partially constructed. The Nor-Bath Trail has been extended approximately an additional half-mile, from its 2013 terminus at Clear Springs Drive in Northampton Borough, to the intersection of Main Street and 10th Street. Planning is ongoing to determine the route of the final connection to the Northampton Canal trailhead of the D&L Trail.



D&L Trail / Photo credit: LVPC

Trail Gap 5: D&L Trail: North Catasauqua

Municipalities: Catasauqua Borough, Northampton Borough, North Catasauqua Borough

Start: D&L Trail approx. 0.5 miles south of Northampton Canal Trailhead

End: D&L Trail near Race Street, Catasauqua Borough

Status update: Trail gaps 5A and 5B from the 2013 Lehigh Valley Trails Inventory have been closed as part of the Northampton and North Catasauqua Trail Improvements Project in 2022. Trail gap 5C, at the Race Street and Lehigh Street intersection in Catasauqua Borough remains, but is under construction.



D&L Trail / Photo credit: LVPC

Trail Gap 6: D&L Trail – Dauphin and Bradford Streets Share the Road

Municipalities: City of Allentown

Start: Kimmitt's Lock, Allentown

End: D&L Trail at N. Bradford Street, Allentown

Status update: This project is in the final engineering phase. Final designs are being prepared to meet permitting needs. Projects are being led by the City of Allentown and Hanover Township.



Left to right: Basel Yandem, City of Bethlehem, Becky Bradley, LVPC, Michael Allehal, City of Bethlehem, J. William Reynolds, City of Bethlehem, Phillips Armstrong, Lehigh County, Lamont G. McClure, Jr., Northampton County and Ryan Meyer, Lehigh and Northampton Airport Authority. Photo credit: LVPC / Photo Date: 7-23-25

Trail Gap 7: South Bethlehem Greenway Trail to Saucon Rail Trail

Municipalities: City of Bethlehem, Hellertown Borough

Start: South Bethlehem Greenway at Auburn Street, Bethlehem

End: Saucon Rail Trail at Bachman Street, Hellertown Borough

Status update: A 0.9-mile gap separates the South Bethlehem Greenway from the Saucon Rail Trail, which has prevented an active transportation connection between Bethlehem and Hellertown. The gap also separates the Lehigh Valley's regional trail network, the LINK, from the Circuit Trails, greater Philadelphia's trail network. Due to the gap's local and regional significance, Pennsylvania Department of Conservation and Natural Resources (PA DCNR) identified it as a top 10 trail gap in the Commonwealth. Various funding sources have been utilized to take steps to help close the trail gap, including Transportation Alternative Set-Aside funds allocated through the Lehigh Valley Transportation Study,

PA DCNR, U.S. Fish and Wildlife Service Highlands Conservation Act Grant, Northampton County Livable Landscapes Grant Program and congressional Community Project Funding. The final phase to construct the Greenway extension is now fully funded, with construction in 2026. The connected South Bethlehem Greenway and Saucon Rail Trail will provide 13.7 miles of safe and accessible trail for all users, to link together parks and open space, residential areas and commercial and cultural hubs.

Trail Gap 8: Karl Stirner Arts Trail to Palmer Township Bike Path

Municipalities: City of Easton, Palmer Township, Wilson Borough

Start: Karl Stirner Arts Trail at 13th Street, Easton

End: Palmer Bikeway at Edgewood Avenue, Palmer Township

Status update: This approximately one mile trail gap spans from the Edgewood Avenue trailhead of the Palmer Bikeway in Palmer Township, to the Karl Stirner Arts Trail trailhead in Easton, near the Easton Silk Mill. No new trail has been constructed in this segment since 2013, however, it is identified in planning documents such as Walk/RollLV and remains a priority to be connected in the future.

Factors affecting the closure of this gap include possible development of a large parcel of land on the south side of the Bushkill Creek that makes up a large portion of the gap, and high traffic and difficult sight lines for cyclists and drivers on Bushkill Drive, on the north side of the creek.

Photo credit: LVPC / Karl Stirner Arts Trail





Photo Credit: LVPC / Buskill Township - Jacobsburg Park

Trail Gap 9: Tatamy Rail Trail to Jacobsburg Environmental Education Center (JEEC)

Municipalities: Bushkill Township, Plainfield Township, Stockertown Borough, Tatamy Borough

Start: Tatamy Trail trailhead at Main Street, Tatamy Borough

End: Plainfield Township trailhead at Main Street (PA 191), Bushkill Township

Status update: This trail gap spans a handful of municipalities and separates four trails, the Jacobsburg Environmental Education Center Trails, Plainfield Township Recreation Trail and Tatamy Rail Trail. Significant progress to close the trail gap has been made since 2013. Stockertown Borough has constructed a multi-use trail (Stockertown Rails-to-Trails) from Sherman Metzgar Park to the Belfast Junction trailhead of the Plainfield Township Trail. However, to connect from one trail to the other, trail users must navigate an unmarked crossing of Route 191/Main Street. From this junction, there is a conceptual trail connection to the Jacobsburg Environmental Education Center, which has been partially constructed.

“Since 2013, the trail gap has received \$654,000 in funding from both the Transportation Alternatives Set-Aside (TASA) program and from DCNR to help finalize this trail gap. In 2025, a segment of trail was constructed from the Center’s southern entrance at Henry Road to Filetown Road, aligned along Route 33. The remainder of the conceptual route is anticipated to cross Route 33 at Filetown Road and continue along the Route 33 rights-of-way until the junction of the Plainfield and Stockertown trails. An additional gap remains from Sherman Metzgar Park in Stockertown, to the Tatamy Trail trailhead at Main Street. In 2025, Northampton County used Highlands Conservation Act Grant Award funding to purchase 43 acres of open space that includes the area of the trail gap in Stockertown Borough, which will help facilitate future trail construction.

Trail Gap 10: Bushkill Township PPL Trail to Appalachian Trail

Municipalities: Bushkill Township, Plainfield Township

Start: Bushkill Township Trail parking lot at East Moorestown Road (PA 512), Bushkill Township

End: Appalachian Trail near Route 33, Plainfield Township

Status update: Additional trail has been constructed, from the trailhead at E. Moorestown Road (Route 512), east along the road to Professional Drive. The Township and warehouse developers on the north side of Route 512 have agreed to allow future trail construction on the property.

To reach the Appalachian Trail, future trail development will likely be along utility rights-of-way and on-road segments of low-volume roads. Additional coordination between the Township, state agencies and property owners will be needed.

Photo Credit: Google Maps / Buskill Township - PPL Trail





Trail Benefits

Trails have become increasingly recognized as essential assets in Lehigh Valley communities. Trails can deliver a wide range of transportation, recreational, environmental, and economic benefits. The trail system serves as an important component of transportation networks, improving connectivity, providing accessible opportunities for physical activity, improving environmental resilience, and increasing economic activity. The wide range of benefits extend beyond the traditional belief of a strictly recreational asset.

As part of a connected network, they offer safe routes for walking and rolling that link places such as schools, workplaces, parks and transit stops, helping people travel without solely relying on motor vehicles. Trail infrastructure contributes to environmental resilience by preserving natural features, supporting stormwater management, and preserving ecological connections. Trails also generate economic value by attracting tourism and visitors, supporting local business and increasing property values. As communities look for ways to improve quality of life, investment in trail infrastructure has become increasingly valuable.

Trails as Transportation

Trails provide a critical transportation mode, linking people to key recreation, open space, education, workplace and other desired destinations, without a car and at little or no expense. They provide, reliable, safe and accessible corridors for walking, bicycling and other non-motorized forms of travel. These systems support and enhance traditional transportation infrastructure including roadways and transit, allowing for personal modal choice, supporting emerging

transportation technologies such as e-bikes and providing increasing opportunities at all ages and abilities to experience the region's abundant natural and recreational resources. These transportation systems provide low cost and accessible linkages to our daily destinations, while minimizing traditional infrastructure impacts and costs. This section reviews how our trails service as an important part of the transportation network.

Trails are an integral part of the transportation system, offering an affordable, flexible and healthy option for travel. The benefits to communities and trail users are many.

Trails reduce dependence on fossil fuels and offer residents healthier, more affordable commuting options by encouraging active mobility.

Trails provide safe, accessible routes for walking, biking and largely non-motorized forms of travel. These pathways help people move between neighborhoods, schools, workplaces, and public transit stops without relying on cars, filling critical gaps in the transportation system.

Trails also bridge “last-mile” gaps to transit stations and employment centers, improving access for all users.

Connectivity is one of the greatest transportation benefits of trails. When designed as part of a regional or municipal system, trails link key destinations and form continuous corridors that make active travel both feasible and attractive. This not only benefits individuals but also reduces vehicle congestion, leading to cleaner air and less wear on road infrastructure.

For people who cannot or choose not to drive, such as youths, seniors or zero-vehicle households, trails offer a safe and free means of getting around. Expanding multimodal options allows communities to create inclusive transportation systems that support all residents, regardless of income or ability.

Trails as Recreation

Trails provide a physical connection to access our community's natural and cultural landscapes, while allowing us to be physical as we use them – whether walking, running, or cycling, the experience is much different than it would be sitting in a car or bus. Trails not only serve as a means to connect us to places to recreate such as parks, playgrounds, lakes, streams, sports fields, fishing spots, boat launches or campsites, they often are the source of recreational activity.

Whether you like to walk, bird watch, ride a bike, run, or roll, trails are usually how you access these places and in so doing, you are also recreating. These experiences build appreciation for maintaining and stewarding our trail network and the many unique and special places that the network allows us to experience. This section shows the many ways trails increase our region's recreation options.

Trails offer access to outdoor environments that reduce stress and improve mental health, giving people an accessible way to experience nature close to home.

Trails encourage regular physical activity such as walking, running and cycling, which improves cardiovascular health and reduces obesity and chronic disease rates.

Trails serve as community gathering places for casual encounters, family outings and organized events like charity walks or fun runs.

Social interaction is a core benefit. This fosters stronger community ties and creates spaces that promote inclusivity and shared experiences. A well-designed trail system can also become a source of local pride and identity.

Trails showcase and protect natural, historic and cultural resources.

Finally, trails connect people to nature and cultural landscapes, rivers, forests, farmland, and historic sites, helping build appreciation for environmental stewardship and heritage preservation.

Trails as Resilient Infrastructure

Resiliency is defined as, “The capacity to withstand or to recover quickly from difficulties; toughness.” Trails add that toughness to our ecological community and landscape features in locations across the region. They are often one of many “spokes” in a community’s green infrastructure network – a connected system of nature-based corridors such as trails, greenways or riparian buffers that harness the benefits of ecological design. Trails, a type of green infrastructure, are sometimes constructed in or adjacent to ecologically sensitive areas such as wetlands, woodlands and floodplains.

Trail design must incorporate systems and materials that protect habitat and provide recreation opportunities. By incorporating ecologically sensitive design such as vegetative stormwater management practices and considering site constraints, trails may be better adapted to recover from natural weather events more quickly than traditional gray infrastructure. This section shows some of the ways trails make our environment more resilient.

Trails can help minimize impacts to wetlands and streams and increase site stabilization through climate adaptive practices.

Trails can be key components of green infrastructure networks, which can incorporate elements such as permeable pavements, rain gardens and bioswales, that all work together to manage stormwater and reduce flooding.

Trails can serve a functional role during emergencies.

Because they are often continuous and separated from major roadways, trails may act as alternative routes for emergency access or evacuation during floods, storms or traffic disruptions. This makes them valuable assets for community resilience and safety planning.

From a climate adaptation perspective, trails contribute to reducing urban heat islands by maintaining vegetated corridors and shade.

They preserve open space and habitat connectivity, supporting biodiversity and ecosystem health. Integrating trails into broader greenway or watershed planning efforts ensures that infrastructure investments achieve multiple objectives, transportation, recreation, stormwater management and climate resilience, all within one project.

Photo Credit: LVPC



Trails as Economic Generators

Trails generate economic activity in the Lehigh Valley as quantified in documents such as the 2014 Lehigh Valley Return on Environment Study and the 2025 Northampton County Return on Environment update. Studies referenced in the 2020 Walk/Roll LV- Active Transportation Plan note that Americans increasingly want to live in communities that are walk, bike and roll friendly, which has led to higher property values and higher property tax revenues in communities that invest in active transportation.

Trail users spend money at nearby businesses, purchase specialized equipment and clothing, purchase parts at repair shops, and generally support local communities they visit. Ultimately, trails boost tourism, raise property values and increase recreation-related spending across a region that has a reputation as one of Pennsylvania's most visited for recreational options. This section takes a closer look at how those benefits add up.

Trails provide significant direct and indirect economic and health benefits to the region.

The *2014 Lehigh Valley Return on Environment* study estimated over \$80 million in direct economic impacts annually from walking and bicycling activities. This includes direct spending on outerwear, athletic wear and equipment as well as generating income for trail users and supporting businesses such as restaurants, trail side cafes, and bike repair shops. Property values are also boosted by trails, as various case studies show that homes near them are valued higher and have elevated demand.

In the Lehigh Valley, there are many greenway and trail corridors in residential areas, such as the Jordan Creek, Bushkill Creek, Monocacy Way and more, which can boost surrounding property values from 5% to 32%, according to the U.S. Department of Agriculture. The *Lehigh Valley Return on Environment* study calculated property values near a trail or park increased by \$14,600.

Trails contribute to local tourism and business development.

Visitors drawn to scenic or connected trail networks often spend money on food, lodging and recreation, boosting local economies. Studies, including the *2014 Lehigh Valley Return on Environment*, show that homes and businesses near well-maintained trails enjoy higher property values and increased customer traffic.





Barriers to Closing Gaps

Despite broad support, closing gaps in the Lehigh Valley's trail system remains a persistent challenge.

Trail gaps are often the result of a number of factors including historical land-use decisions, natural barriers or funding shortfalls. The process of closing these gaps is complex, requiring alignment among multiple Lehigh Valley stakeholders, regulatory compliance at all levels, and substantial financial resources.

Funding and Cost Barriers

One of the most significant obstacles to closing trail gaps and completing trail networks is securing adequate funding. Trails are often considered amenities rather than transportation infrastructure. This means that trail projects must compete for already limited funds against transportation projects focused on road maintenance, bridge repairs and transit improvements. If grants are available for trail projects, they may require local matches, which can be difficult for some communities and organizations to secure.

Cost estimating can be uncertain. Overruns are common due to rising material prices, complexities in the design phase, or even unexpected environmental issues. In some cases, the per-mile cost of trail projects is higher in gap areas because of constrained rights-of-way or the need for infrastructure upgrades or unique engineering solutions. These financial barriers can delay a project for years, leaving the gaps unaddressed.

Land Acquisition and Rights-of-Way Issues

Acquiring land to close trail gaps can be complex, expensive and time-consuming. Many of the conceptual trail corridors cross privately owned parcels, and negotiating easements or purchases can be contentious. Property owners may resist providing easements due to concerns regarding liability and privacy. Property owners may also resist selling property due to concerns over perceived negative impacts to remaining adjacent property they own.

In more urban areas in the region, high land costs and dense development can complicate land acquisition even more. Gaps may also occur along railways for rails-to-trails efforts. Rights-of-way acquisition for railways may require piecemeal negotiations with multiple landowners or difficult negotiations with rail companies. Without legal access to a more continuous corridor, trail projects may be forced to pursue expensive detours or risk delays.

Environmental and Regulatory Constraints

Environmental considerations can slow the development of a trail. Trails are frequently in areas that intersect with wetlands, floodplains, rivers or endangered species habitats. These projects will require special considerations to mitigate natural resource impacts, and in most cases, trigger specific permitting requirements. Compliance with federal and state environmental regulations, such as National Environmental Policy Act (NEPA) serve important conservation purposes but often result in delays that can bring frustration to a trail project.

These considerations need to be factored early in the design and approval process to ensure successful integration with natural resources. Mitigation measures like constructing elevated boardwalks or implementing stormwater controls can significantly increase project costs. Balancing ecological preservation and easy trail connectivity is an ongoing challenge.

Stakeholder Coordination Challenges

Coordination among stakeholders can often be one of the most complex barriers to closing a trail gap. Trail gaps may span multiple jurisdictions such as counties and municipalities. This can require careful collaboration and long-term commitment. Differing priorities, timelines and funding capacity can stall or cancel projects, especially when one jurisdiction is unwilling or unable to work to advance a portion of a project.

Photo Credit: LVPC

Stakeholder conflicts may also arise, such as advocacy for different aspects of a trail project. Advocates for recreation, conservationists concerned about ecological impacts, transportation planners and local residents often have differing priorities. Achieving consensus on design, alignment and maintenance is a time-consuming process that can delay a project.





Community and Stakeholder Engagement

In 2025 LVPC staff solicited input from municipalities, county agencies, non-profits and regional partners through a variety of methods including stakeholder meetings, interviews and surveys.

Survey participants reviewed the LVPC interactive map and provided corrections, status updates, project descriptions, and links or offers to share Geographic Information System (GIS) files. Several responses included detailed project status including design, permitting, funding, grant amounts or applications, and specific physical or jurisdictional barriers.

This engagement provided valuable information used to verify and expand the Trail Connection Strategy and to document active, planned and conceptual trail work throughout the Lehigh Valley.

The objective of the outreach was to validate existing mapped trail assets, identify and describe persistent trail gaps and the barriers to closing them, to collect information on project status, funding, permitting, and obtain available spatial data in support of the regional inventory. The surveys were sent to local governments, county staff and multiple local trail advocacy organizations. A total of 24 surveys were completed.



Left to right: Front Row > Rob Neitz, PA Department of Conservation and Natural Resources, Evan Gardi, LVPC, Brit Kondravy, D+L Heritage Corridor, Christian Martinez, LVPC Middle > Bryan Cope, Northampton County, Scott Slingerland, Coalition for Appropriate Transportation, Brandon Sullivan and Trevor Pinho, City of Easton, Sherry Acevedo, Northampton County, Jeff Rau, PA Department of Transportation
Photo credit: LVPC

Survey participants repeatedly cited the following core challenges to implementing trail projects:

- Funding was the most frequently noted obstacle, including capital and maintenance costs for bridges, crossings and trail surfacing.
- Land acquisition and private property, including a lack of easements or unwilling landowners
- Permitting and environmental constraints, including National Pollutant Discharge Elimination System (NPDES) stream permitting, environmental review timelines and coordination with state agencies.
- Jurisdictional fragmentation. Trails that end at municipal boundaries or require multi-jurisdictional agreements create issues for securing rights-of-way and maintenance responsibility.
- Safety and design issues, including difficult or hazardous road crossings, grade and railroad obstructions and lack of Americans with Disabilities Act accessibility.
- Lack of political or community will, including occasional local resistance or competing land use priorities that prevent acquisition or trail alignment choices.

Photo Credit: LVPC



Left to Right: Evan Gardi and Clay Karnis, LVPC, Bryan Cope, Northampton County



Left to Right: Chris Stroehler, South Whitehall Township and Clay Karnis, LVPC

COMMUNITY PARTNERS

The Lehigh Valley benefits from a strong base of rail-trail and greenway assets but connectivity between the networks is uneven. Major crossings and private parcels are significant constraints. Closing a relatively small number of linkages could substantially increase regional connectedness. Projects with committed funding and completed design and permitting demonstrate that the primary bottleneck for many gaps is right-of-way acquisitions and long-lead time coordination, rather than technical feasibility. In addition to the survey, the LVPC hosted and presented at two meetings of THE LINK Trail Network committee.

THE LINK is an interconnected network of multi-use trails across the Lehigh Valley and consists of over 125 miles of trails that connect into many more trail systems outside of the Lehigh Valley. These include Philadelphia, the Pocono Mountains, New York, New Jersey and various other regions. It is supported by a network of regional partners committed to enhancing this valuable resource. The partners meet often to discuss the growth of the Lehigh Valley's trail network. The LVPC presented survey results, mapping and preliminary findings at two LINK partner meetings to discuss the update to the Trail Inventory, the prioritization process and to gather input on the major trail gaps identified in the Lehigh Valley.



Left to right: Front Row > Rob Neitz, PA Department of Conservation and Natural Resources, Evan Gardi, LVPC, Christian Martinez, LVPC, Kent Baird, Brit Kondravy, D+L Heritage Corridor, Bryan Cope, Northampton County, Scott Slingerland, Coalition for Appropriate Transportation, Clay Karnis, LVPC, Brandon Sullivan, City of Easton and Sherry Acevedo, Northampton County

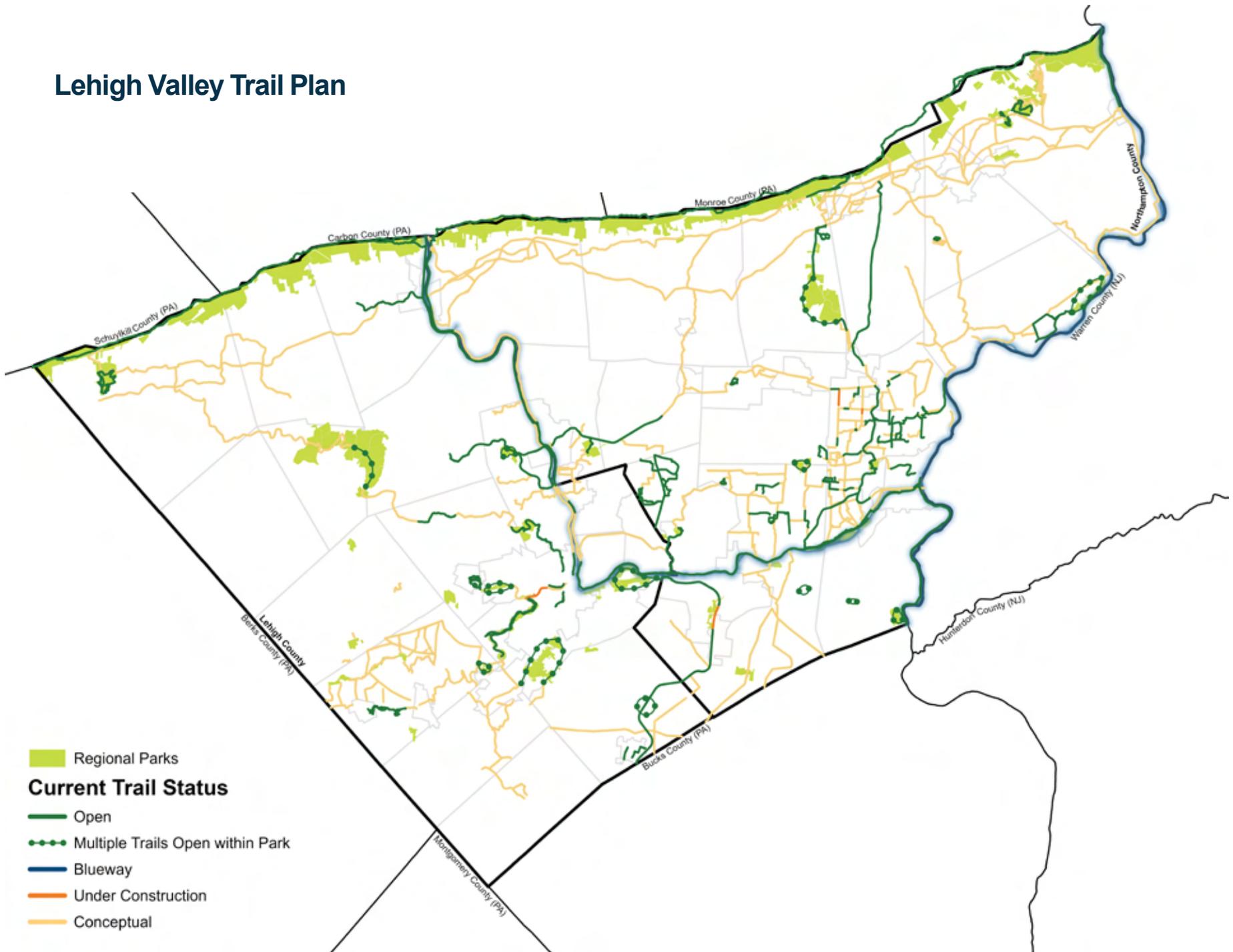


Trail Inventory

Based on information gathered, LVPC compiled an inventory of all trail infrastructure in the Lehigh Valley. The map is broken into three trail status categories: Open, Under Construction and Conceptual.

- Open trails include those that can currently be utilized throughout the region. These trails range from recreation only hiking trails, to commuter corridors, to winding pathways through the Lehigh Valley's parks and open spaces.
- Under Construction trails include any trail projects that are in the process of being built.
- Conceptual trails include all potential trail connections noted in municipal, county or regional plans, and those gathered during the community and stakeholder engagement phase of this effort.

Lehigh Valley Trail Plan

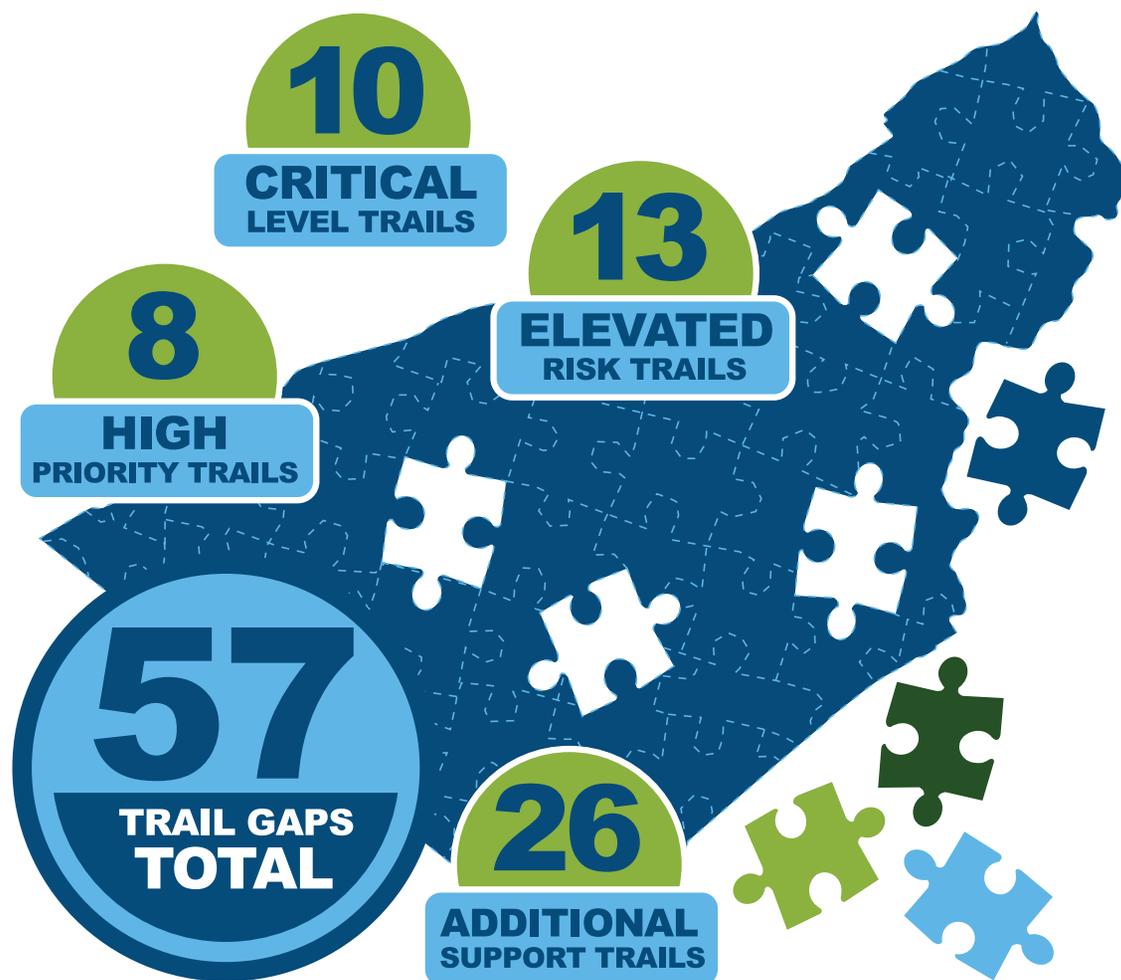


- Regional Parks
- Current Trail Status**
- Open
- Multiple Trails Open within Park
- Blueway
- Under Construction
- Conceptual

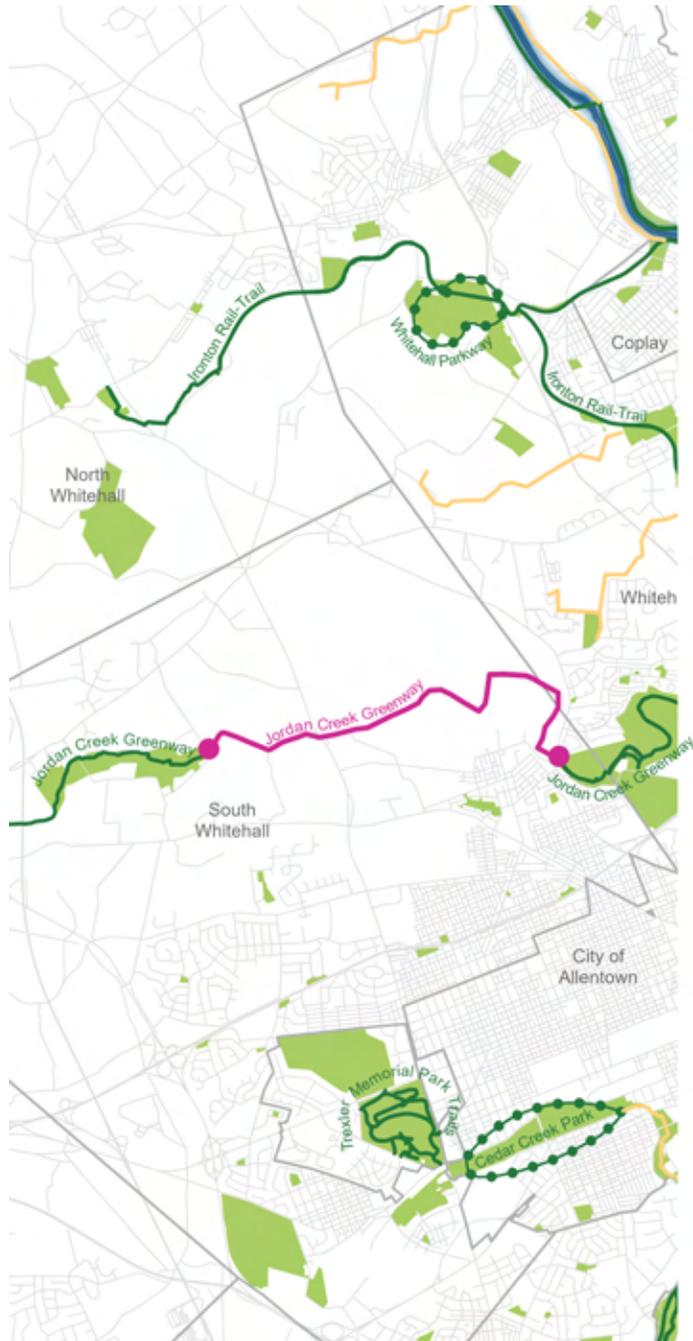
Piecing the Gaps

Fifty-seven trail gaps were evaluated and a complex, data-driven & geospatial analysis was done determine classifications that helped set priorities for how regional leaders will work to close trail gaps in the coming years. The top 10 critical gaps are those trails that have the most significant impact in the region, closing major trail gaps in the regional network.

The additional High, Elevated, and Supporting priority gaps are still important for the region overall but during the analysis did not have as high of a regional impact. A more detailed description of the methodology used to determine the trail gap rankings can be found in the appendix at the end of this document.



JORDAN CREEK GREENWAY TRAIL / CRITICAL PRIORITY GAP 1



Municipalities: South Whitehall Township, Whitehall Township

Start: Mauch Chunk Road at Jordan Creek Park, South Whitehall Township

End: East end of Covered Bridge Park, South Whitehall Township

Description: The Jordan Creek Greenway & Trail aims to connect existing protected open spaces creating a continuous greenway corridor along the Jordan Creek that provides recreational and environmental benefits. Closing this gap would connect Covered Bridge Park and Parkland High School and provide a continuous trail between these locations and neighborhoods and other parks in South Whitehall, Whitehall, and Allentown.

Status: Rights-of-way have been secured, and design and engineering have been completed between N. Cedar Crest Boulevard and Covered Bridge Park. This section of trail will also serve Parkland High School. South Whitehall Township is awaiting grants for construction funding. From N. Cedar Crest Boulevard to Mauch Chunk Road, the Township is engaged in discussions with property owners, and trail development in this stretch is intended to be included in future land development plans.

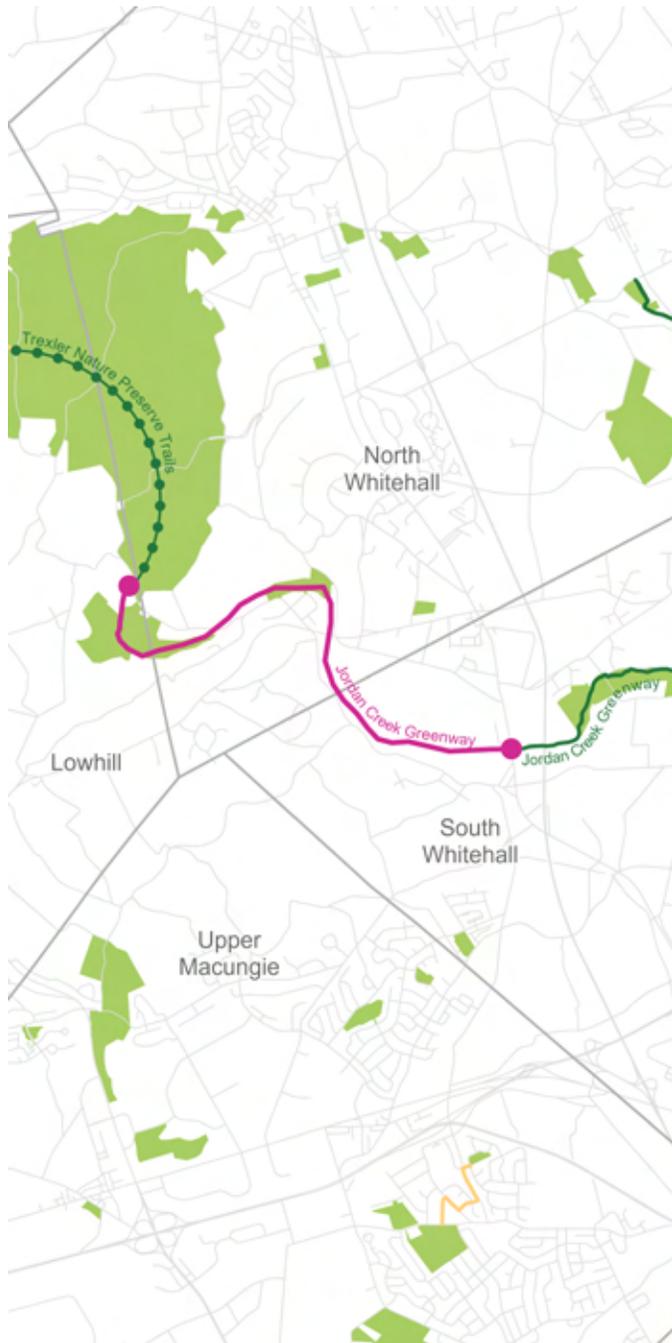
Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Conceptual

Parks, Open Space, Natural Areas



JORDAN CREEK GREENWAY TRAIL / CRITICAL PRIORITY GAP 2



Municipalities: Lowhill Township, North Whitehall Township, South Whitehall Township

Start: Route 309 bridge over Jordan Creek, South Whitehall Township

End: Trexler Nature Preserve, North Whitehall Township & Lowhill Township

Description: The Jordan Creek Greenway & Trail aims to connect existing protected open spaces creating a continuous greenway corridor along the Jordan Creek that provides recreational and environmental benefits. Closing this gap would connect to popular outdoor recreation destinations, Trexler Nature Preserve and Covered Bridge Park. This section of the Greenway could also connect through the historic village of Guthsville, an area of cultural and recreational significance for South Whitehall Township. Closing the two critical trail gap segments in the Jordan Creek Greenway would provide continuous trail from Allentown to Trexler Nature Preserve, greatly enhancing outdoor recreation and multimodal connectivity across Lehigh County.

Status: Starting from Trexler Nature Preserve, Lehigh County is managing trail development from the southern end of the Preserve to Jordan Road, near the Rex Covered Bridge. Land has already been acquired for this segment and final engineering and permitting is occurring. From this point, east to the start of the gap at Route 309, planning is in progress, but there has been no land acquisition as of December 2025. North Whitehall and South Whitehall Townships are managing trail development efforts in these sections within their respective jurisdictions.

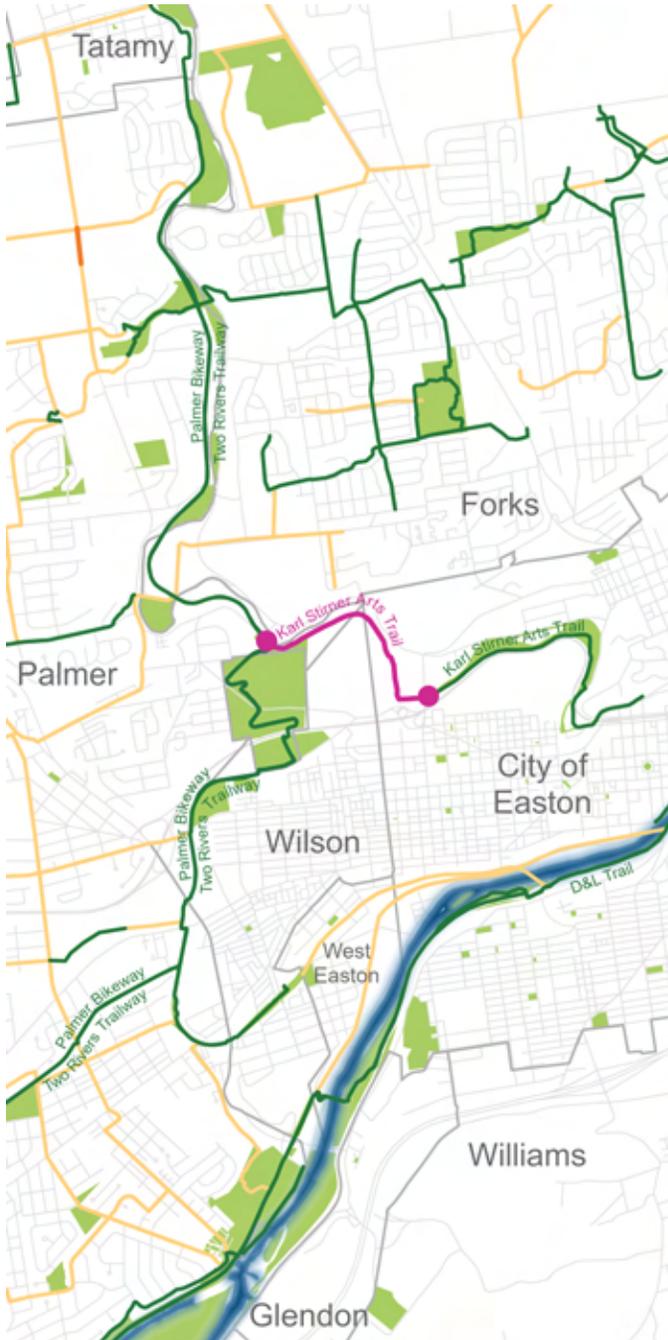
Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Conceptual

■ Parks, Open Space, Natural Areas



KARL STIRNER ARTS TRAIL / CRITICAL PRIORITY GAP 3



Municipalities: Palmer Township, Wilson Borough, City of Easton

Start: N. 13th Street at Simon Silk Mill, City of Easton

End: Palmer Bikeway at Hackett Park, Palmer Township

Description: Construction of trail in this gap would make the Karl Stirner Arts Trail continuous, providing a spur route from the Palmer Bikeway to the Simon Silk Mill, downtown Easton and Lafayette College. Constructing trail in this segment would provide a safer alternative for cyclists, as the current shortest connection, Bushkill Drive, is dangerous due to high vehicle speeds and short sight lines.

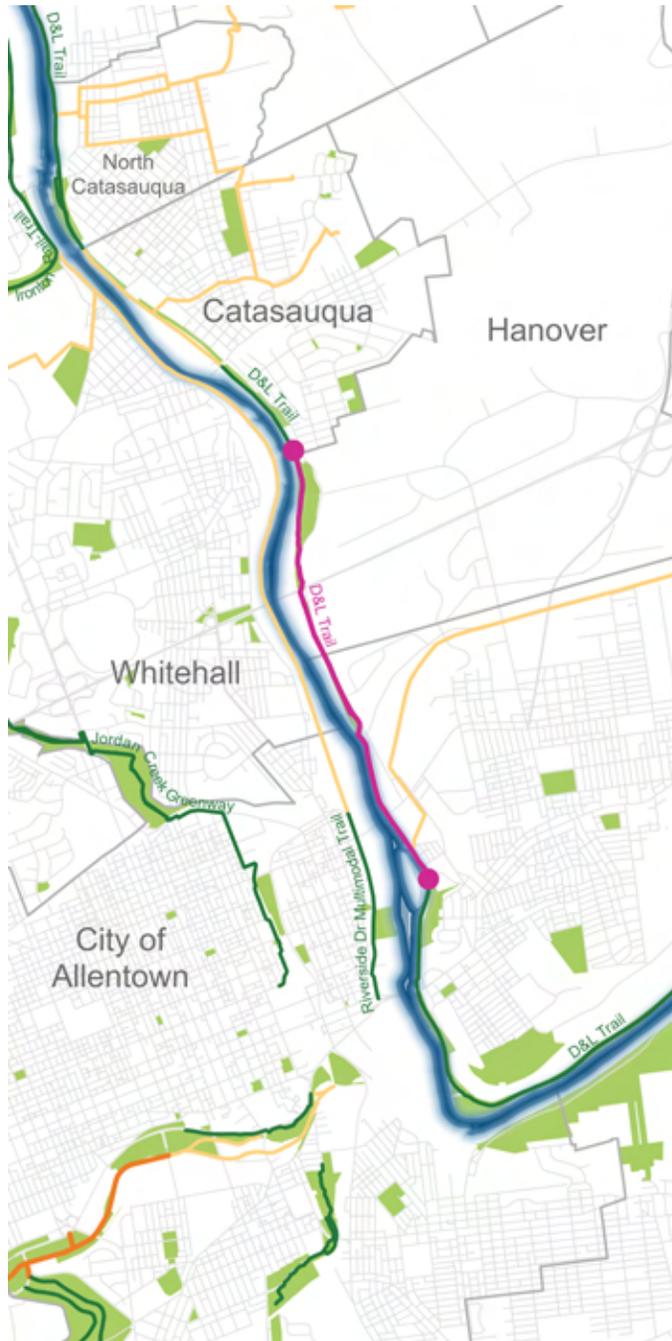
Status: There are two likely routings for trail in this gap. One is for trail to be constructed along the Bushkill Creek with land development activities at the former pigment plant site. This would likely connect at the Edgewood Avenue trailhead. However, it is uncertain what will go in at the site and when. The second option is to route trail along Hackett Avenue and connect with the Palmer Bikeway/Two Rivers Trailway at or near Hackett Park. Coordination is ongoing between the municipalities and landowners.

Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Under Construction
- Conceptual
- Parks, Open Space, Natural Areas



D&L TRAIL / CRITICAL PRIORITY GAP 4



Municipalities: Hanover Township (LC), City of Allentown

Start: North Bradford Street, City of Allentown

End: D&L Trail at Hanover Canal Park, Hanover Township (LC)

Description: This project will build out a large segment of trail on the east side of the Lehigh River, creating a continuous route on the D&L Trail through the Lehigh Valley, connecting to Carbon County in the north and Bucks County to the southeast. Construction of this trail segment will also improve multimodal connectivity in and around East Allentown and between Allentown, Bethlehem and Easton as a whole. The project is part of a broader vision, to create a 14-mile loop trail along the Lehigh River between the Hamilton Street Bridge in Allentown and the Route 329 Bridge in Cementon, Whitehall Township.

Status: This gap has one main project area in Allentown and another in Hanover Township. In Allentown, the City is leading development activities, in coordination with Delaware & Lehigh (D&L) National Heritage Corridor. Just over one mile of trail will be constructed between the N. Bradford Street trailhead and the City line, between Kimmett's Lock and St. Luke's Way. There will be a shared-use path on N. Bradford Street, from the trailhead to the intersection with N. Dauphin Street. The trail will then be off-road with a multi-use path from the intersection, along N. Dauphin Street to the city line. This segment will go through Kimmett's Lock, which will be integrated into the trail. Hanover Township, in coordination with D&L National Heritage Corridor, is leading trail development within their jurisdiction. From the Allentown/Hanover Township line to Hanover Canal Park, an off-road multi-use trail is planned along N. Dauphin Street. These projects are in final engineering stages. Additional funding for construction in the Allentown area may be needed.

Current Trail Status

- Critical Trail Gap
- Open
- Blueway
- Under Construction
- Conceptual
- Parks, Open Space, Natural Areas
- Multiple Trails Open within Park



D&L TRAIL / CRITICAL PRIORITY GAP 5



Municipalities: Whitehall Township, Coplay Borough

Start: Cementon Trailhead, Whitehall Township

End: Race Street Bridge, Whitehall Township

Description: Trail development in this segment will connect the D&L Trail to the Ironton Rail Trail (IRT). There are two gaps within this project area. The north gap is between the D&L trailhead at Cementon and the IRT at Saylor Park, Coplay Borough. The south gap is between the IRT Water Street trailhead and the Race Street Bridge in Whitehall Township. This project will align the D&L Trail with a portion of the already-open Ironton Rail Trail running north/south through Coplay Borough. The project is part of a broader vision, to create a 14-mile loop trail along the Lehigh River between the Hamilton Street Bridge in Allentown and the Route 329 Bridge in Cementon, Whitehall Township.

Status: Trail construction throughout the gap area will be along railroad rights-of-way, which still needs to be acquired. Lehigh County is leading trail development efforts, and the County has had discussions with the railroad about acquisition. More discussions between the County and railroad will be needed in the future, and Lehigh County is raising funds for acquisition.

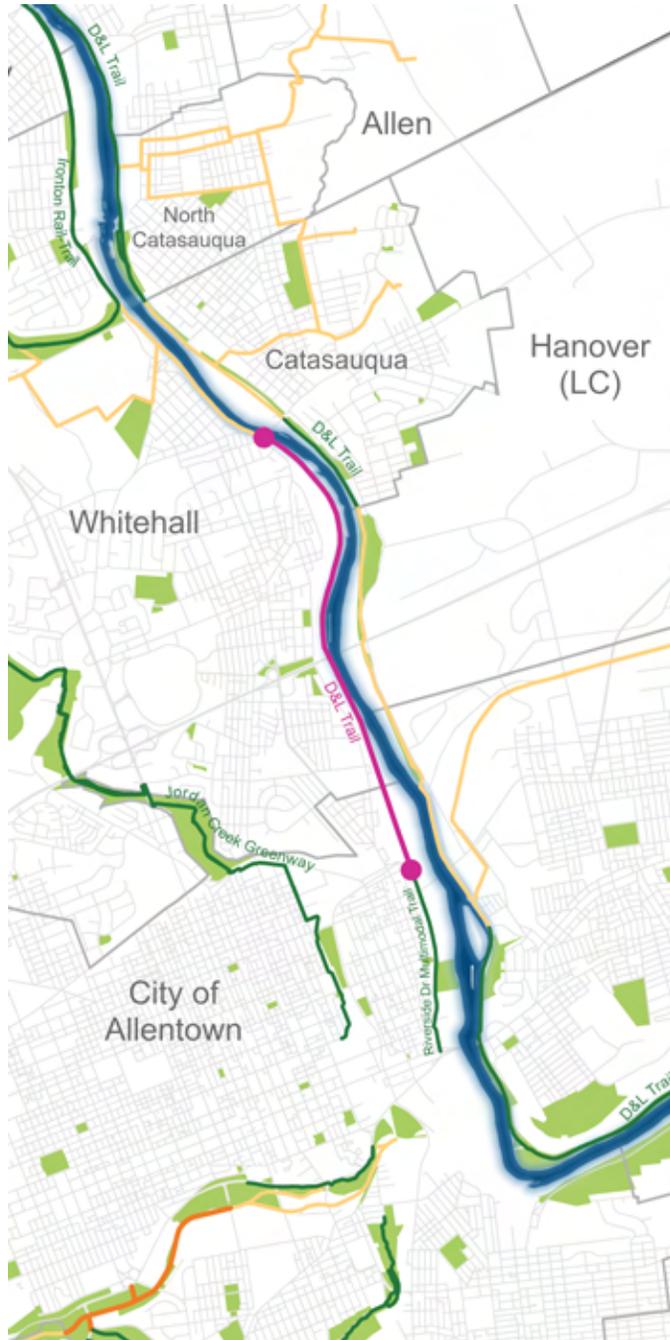
Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Conceptual

■ Parks, Open Space, Natural Areas



D&L TRAIL - RIVERSIDE DRIVE / CRITICAL PRIORITY GAP 6



Municipalities: City of Allentown, Whitehall Township

Start: Riverside Drive and Furnace Street intersection, City of Allentown

End: Race Street Bridge, Whitehall Township

Description: The Riverside Drive Multimodal Revitalization Corridor Project will link Allentown and Whitehall Township, along the west side of the Lehigh River. The project was a successful applicant to the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant in 2021. A key goal of trail construction in this area is to create a multimodal commuting corridor, providing safe access to schools, jobs, shopping, entertainment and residential areas, where it largely does not exist currently. Trail construction from Furnace Street to Race Street will be aligned with construction of the Riverside Drive extension. The LVPC is leading planning efforts to close the gap, and is coordinating with the Pennsylvania Department of Transportation, Lehigh County, City of Allentown and Whitehall Township. The project is part of a broader vision, to create a 14-mile loop trail along the Lehigh River between the Hamilton Street Bridge in Allentown and the Route 329 Bridge in Cementon, Whitehall Township.

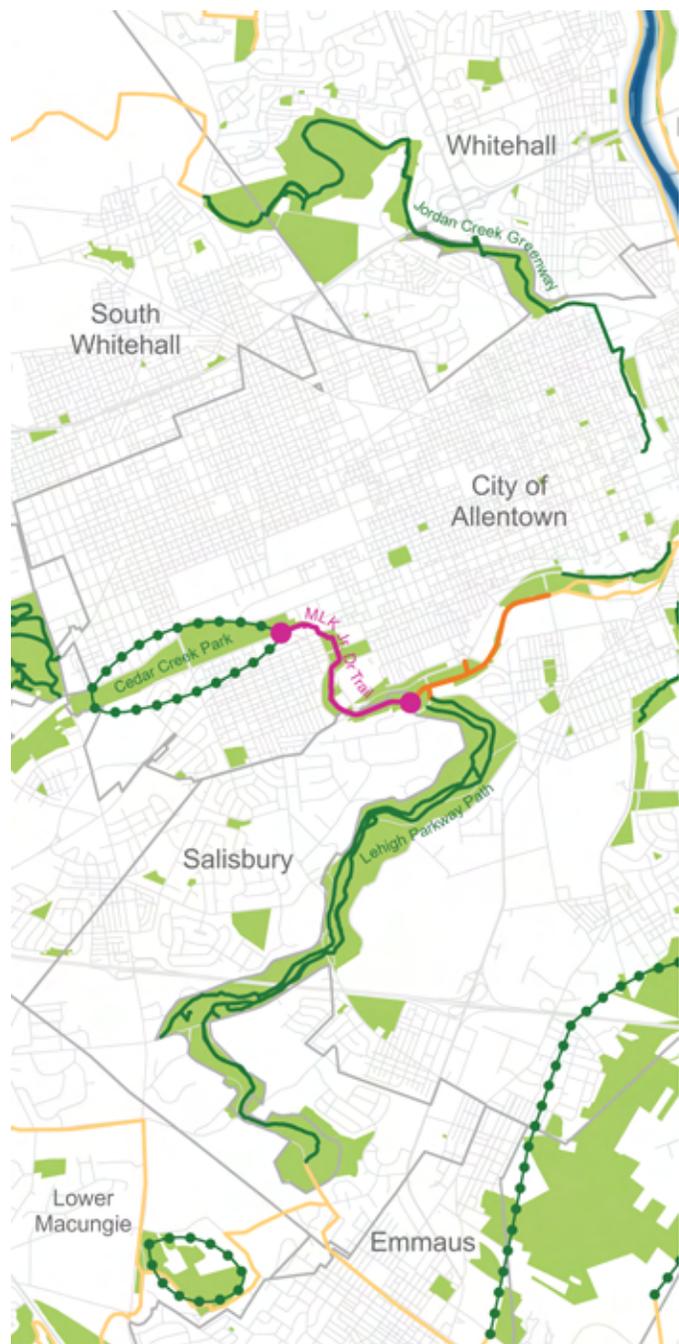
Status: Trail has already been constructed through the first phase of the project, as there is an off-road shared-use path along Riverside Drive, between Hamilton Street and Furnace Street. Phase Two of the project is being designed and engineered. Received Carbon Reduction Program regional funding to help close funding gap. Working to leverage additional regional funds into project.

Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Under Construction
- Conceptual
- Parks, Open Space, Natural Areas



MARTIN LUTHER KING JR. DRIVE TRAIL / CRITICAL PRIORITY GAP 7



Municipalities: City of Allentown, Salisbury Township

Start: Little Lehigh Parkway Path at Kline's Bridge, Allentown

End: Cedar Beach Trail at Hamilton Street, Allentown

Description: This project provides a safe multimodal connection between some of Allentown's most popular recreation destinations, including the Lehigh Parkway, Rose Garden and Cedar Beach Park. This project is Phase 2 of 3 of an initiative to build out the MLK Trail, which will provide more continuity between the City's parks and create a safer environment for pedestrians and cyclists, as Martin Luther King Jr. Drive has high levels of traffic and acts as a barrier between residential and recreational areas. The projects will greatly enhance multimodal connectivity throughout Allentown.

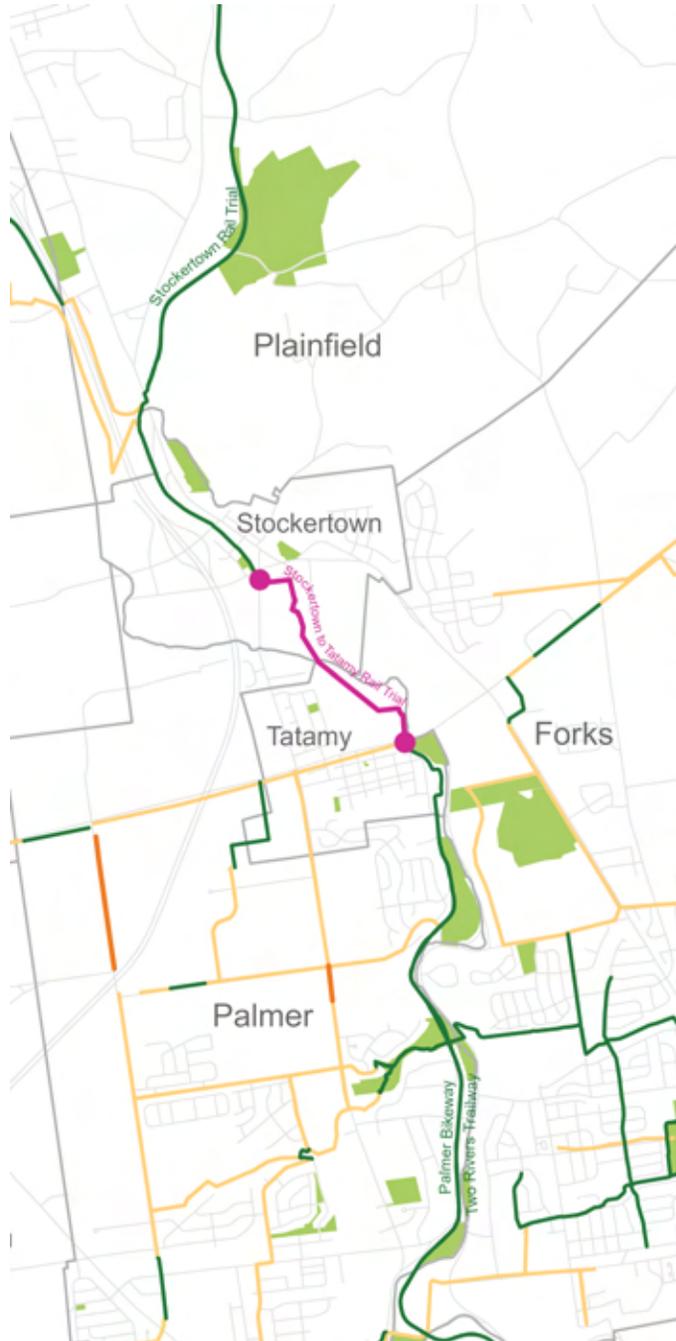
Status: The City is leading trail development efforts, and Phase 2 is undergoing design and engineering.

Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Under Construction
- Conceptual
- Parks, Open Space, Natural Areas



STOCKERTOWN TO TATAMY RAIL TRAIL / CRITICAL PRIORITY GAP 8



Municipalities: Stockertown Borough, Tatamy Borough, Forks Township

Start: Tatamy Trail trailhead at Main Street, Tatamy Borough

End: Stockertown Rail Trail at Sherman Metzgar Park, Stockertown Borough

Description: An approximately one-mile gap between the Stockertown Rail Trail and Tatamy Trail, which is the last missing segment of continuous trail that connects Easton and the D&L Trail to the Slate Belt. Connecting this gap would provide enhanced recreation opportunities and multimodal access across Northampton County. The Stockertown to Tatamy gap has been identified as a top trail gap by both the LVPC and Pennsylvania Department of Conservation and Natural Resources.

Status: The County is leading trail development efforts in this area and coordinating with the municipalities. At the start of the gap, in Tatamy, there is a sidewalk crossing of Bushkill Creek on the Main Street Bridge, and the Borough is applying for grant funding to enhance this crossing and construct trail through Braden Park, to the Uhler Road and Bushkill Drive intersection. Within the gap area, trail routing has not been determined yet, due to environmental factors and landowner negotiations. One possible route is along Uhler Road and Sullivan Trail, then passing through the Bauer Preserve, a 43-acre parcel in the gap area acquired by Northampton County in 2025. The County is in the process of land and right-of-way acquisitions in this area, which will help determine trail routing.

Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Under Construction
- Conceptual

■ Parks, Open Space, Natural Areas



TWO RIVERS TRAIL EXTENSION / CRITICAL PRIORITY GAP 9



Municipalities: City of Easton, West Easton Borough

Start: Two Rivers Trailway between S. 24th Street and Gerald W. Gross Community Park, West Easton D&L Trail at Glendon Hill Road, West Easton

End: Lehigh Drive and Larry Holmes Drive intersection, Easton

Description: Trail development in this gap area presents an opportunity to connect two of the region's most popular trails, the D&L Trail and Two Rivers Trailway, to downtown Easton and its riverfront. Easton aims to construct trail from the Lehigh Drive and Larry Holmes Drive intersection along rail rights-of-way parallel to Lehigh Drive. This right-of-way splits at the inactive Easton & Northern Railroad bridge, near the Lafayette Crew Boathouse. The rights-of-way gradually diverge, with one connecting to the D&L Trail at Glendon Hill Road in West Easton, and the other connecting to the end of the Two Rivers Trailway in West Easton, between S. 24th Street and Gerald W. Gross Community Park. Future opportunities include a Highline trail east of Lehigh Drive, using inactive railroad bridges, through Delaware Canal State Park and across the Delaware River into Phillipsburg, NJ.

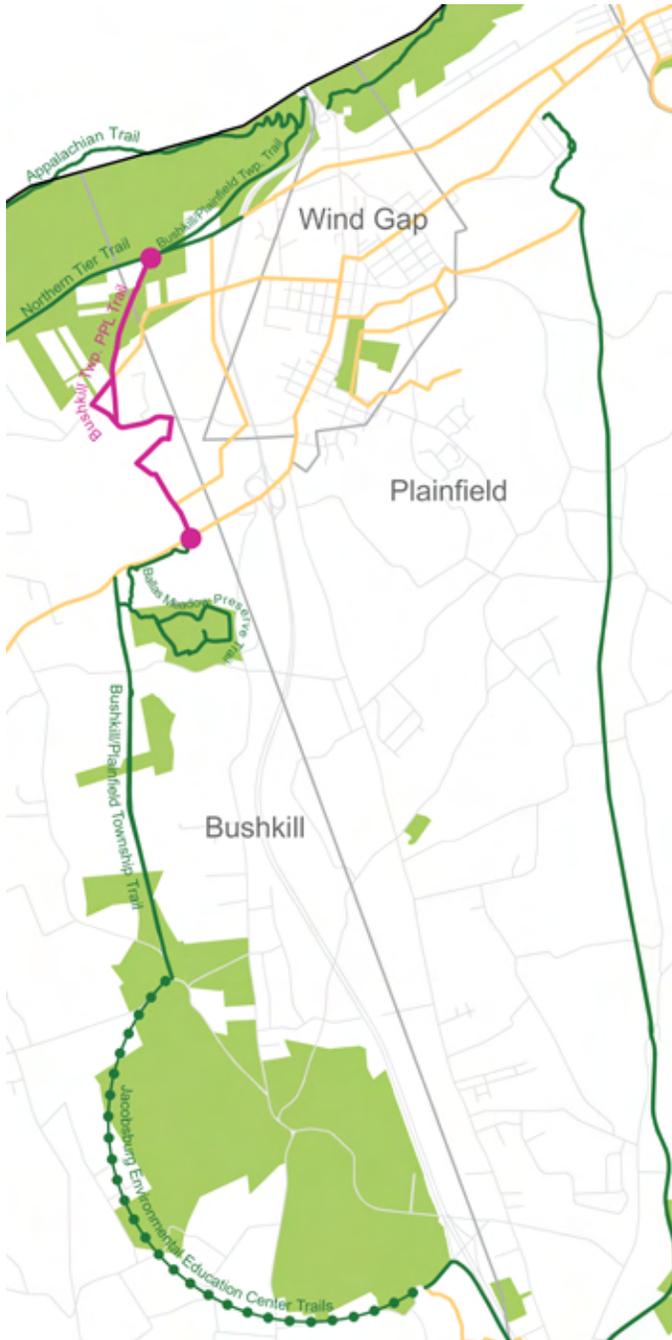
Status: Easton and West Easton are in the process of acquiring properties within their jurisdictions to use for trail development. Rights-of-way from the Two Rivers Trailway to the railroad bridge at the Boathouse is owned by the municipalities, and they are seeking funding for trail development in this section.

Current Trail Status

- Critical Trail Gap
- Open
- Multiple Trails Open within Park
- Blueway
- Conceptual
- Parks, Open Space, Natural Areas



BUSHKILL TOWNSHIP PPL TRAIL / CRITICAL PRIORITY GAP 10



Municipalities: Bushkill Township, Plainfield Township, Wind Gap Borough

Start: Bushkill Township Trail parking lot at E. Moorestown Road (Route 512), Bushkill Township

End: Appalachian Trail at Wind Gap, Plainfield Township or Wind Gap Borough

Description: This gap separates the Bushkill Township Trail and Jacobsburg Environmental Education Center from the Appalachian Trail. Connecting the regional trail network to the Appalachian Trail, which draws visitors from across the country, encourages more users to visit nearby recreation areas and businesses. Trail construction in this area will extend the Two Rivers Trailway and improve multimodal connectivity in Northampton County.

Status: Bushkill Township has negotiated with landowners near the trailhead at Route 512 for trail easements. Additional trail has been constructed east of the trailhead with the warehouse development on the south side of Route 512. The trail now ends at Route 512, between the two warehouses and shopping plaza. Trail rights-of-way have been secured along the warehouse on the north side of Route 512, but additional negotiations are needed with nearby landowners to bring the trail through this area. As of December 2025, the trail connection is planned to utilize utility rights-of-ways and shared-use on low volume roadways to route the trail up to Pennsylvania State Game Lands, north of 8th Street. There are trails on the Game Lands that lead to the Appalachian Trail. These will need to be widened and improved to encourage more users. Coordination is needed between Bushkill Township, Plainfield Township, Wind Gap Borough, Pennsylvania Game Commission, Pennsylvania Department of Conservation and Natural Resources, National Park Service and private landowners. Additional connectivity opportunities exist by routing a trail east along 8th Street into Wind Gap Borough to establish a connection to the Appalachian Trail east of Route 33, which could encourage additional trail development in the Slate Belt area.

Current Trail Status

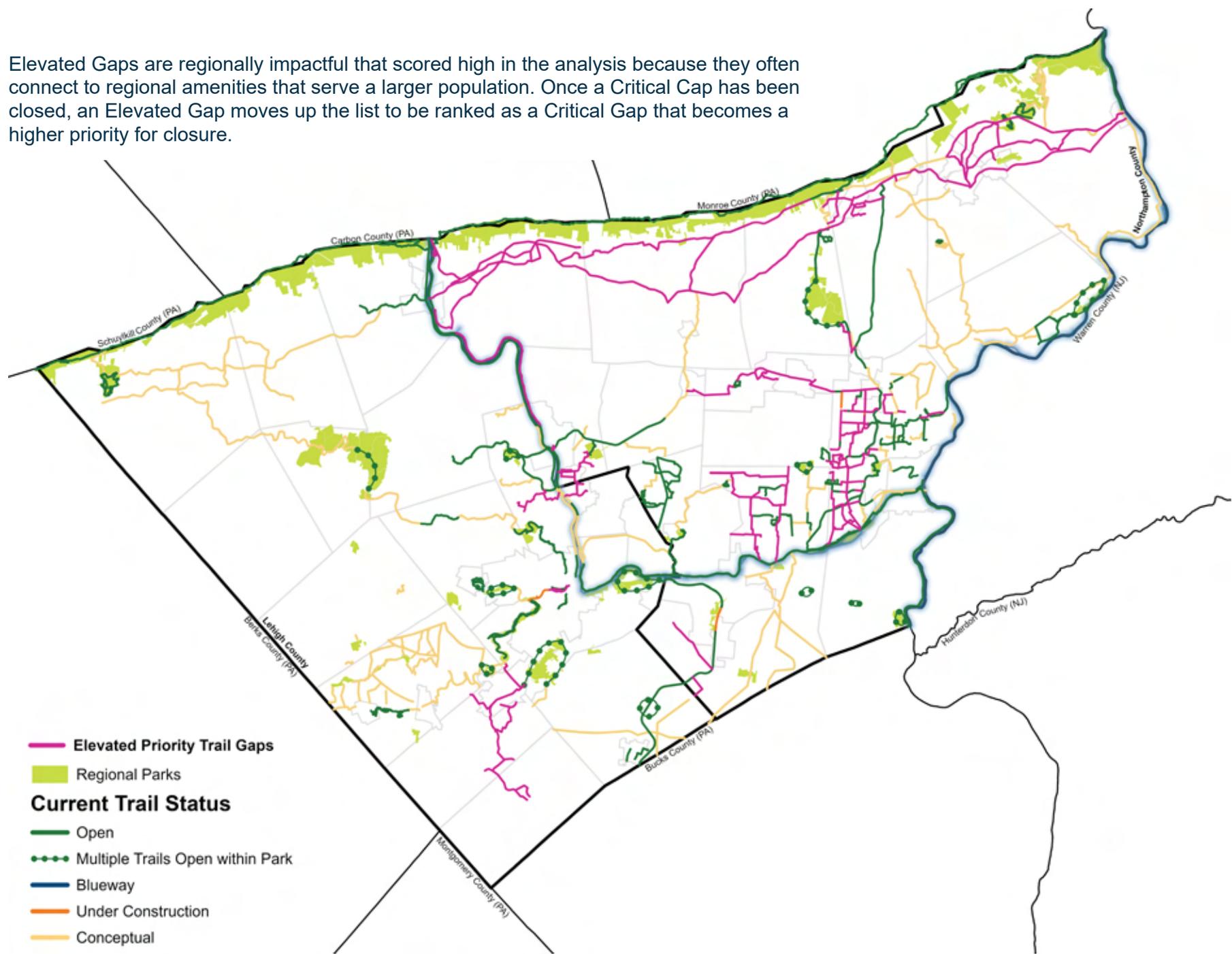
- Critical Trail Gap
- Open
- - - Multiple Trails Open within Park
- Conceptual
- Parks, Open Space, Natural Areas



LEHIGH VALLEY ELEVATED GAPS

TRAIL	DESCRIPTION	MUNICIPALITY
Bethlehem Township Trail Network	Multiple connections within Bethlehem Township Neighborhood Network	Bethlehem Township
Catasauqua-North Catasauqua-Allen Trail	D&L Trail at Catasauqua to Catasauqua Area High School and Nor-Bath Trail	Catasauqua Borough, North Catasauqua Borough, Allen Township
D&L Trail	Northampton to Walnutport, east side of Lehigh River	Walnutport Borough, Lehigh Township, Allen Township, Northampton Borough
MLK Trail Phase 3	Current eastern terminus of MLK Trail to Hamilton St. Exact route not identified yet. Future goal is to connect to D&L Trail and East Allentown	City of Allentown
Nor-Bath Trail	Jacksonville Road to Route 946 in Moore Township via Bath Borough	East Allen Township, Bath Borough, Chapman Borough, Moore Township
Northern Tier Trail	Extensive trail network spanning northern municipalities in Northampton County	Boroughs of Walnutport, Wind Gap, Pen Argyl, Roseto, East Bangor and Portland Townships of Lehigh, Moore, Bushkill, Plainfield, Washington (NC) and Upper Mount Bethel
Palmer Township Trail Network	Multiple connections to Palmer Bikeway and D&L Trail from the Township's neighborhood network	Palmer Township
Saucon Region Trail Network	Saucon Rail Trail to Upper Saucon Township Line	Upper Saucon Township, Lower Saucon Township
Saucon Region Trail Network	Saucon Rail Trail to I-78 Overpass	Upper Saucon Township, Lower Saucon Township
Southwestern Lehigh County Trail Network	Extensive trail network spanning southwestern municipalities in Lehigh County	Salisbury Township, Emmaus Borough, Upper Milford Township, Lower Milford Township
Whitehall Township Trail Network	Schadt Ave to Ironton Rail Trail and D&L Trail	Whitehall township

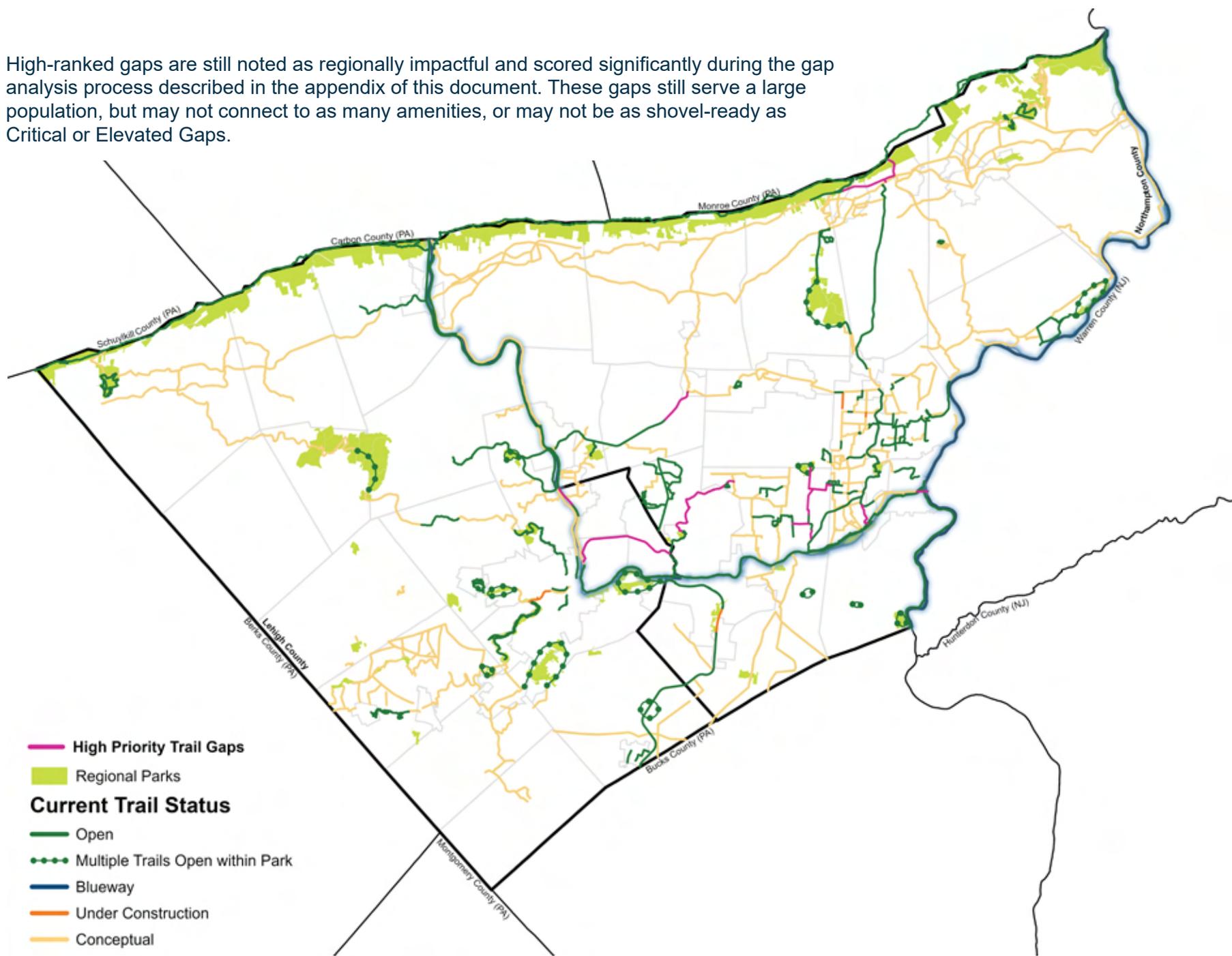
Elevated Gaps are regionally impactful that scored high in the analysis because they often connect to regional amenities that serve a larger population. Once a Critical Cap has been closed, an Elevated Gap moves up the list to be ranked as a Critical Gap that becomes a higher priority for closure.



LEHIGH VALLEY HIGH GAPS

TRAIL	DESCRIPTION	MUNICIPALITY
Bethlehem Township Trail Network	Louise Moore County Park to Palmer Township Neighborhood Network	Bethlehem Township
Bethlehem Township Trail Network	Palmer Bikeway to Bethlehem Township Neighborhood Network	Bethlehem Township
D&L Trail	D&L from Race Street to North Catasauqua Borough Line	Catasauqua Borough
Monocacy Way	From Monocacy Park along Monocacy Creek to Housenick Memorial Park Trail	City of Bethlehem, Hanover Township (NC), Bethlehem Township
Nor-Bath Trail -Jacksonville Road to Bath	Current eastern terminus of Nor-Bath Trail at Jacksonville Rd to Mill Street in Bath Borough	East Allen Township, Bath Borough
Palmer Township Trail Network	From Palmer Bikeway on Freemansburg Avenue to D&L Trail	Palmer Township
The Highline	From the conceptual Two Rivers Trail Extension along Rail Line across Delaware River to Phillipsburg, NJ.	City of Easton
West Bethlehem Rail Trail	West Bethlehem Rail Trail from North Bradford Street to Pennsylvania Avenue and City line	City of Allentown
West Bethlehem Rail Trail	West Bethlehem Rail Trail from Pennsylvania Avenue/City Boundary to Monocacy Way	City of Bethlehem
Wind Gap / Pen Argyl Area Trail Network	From Appalachian Trail North of Pen Argyl Area High School to West Pennsylvania Ave. Trailhead and to N. Broadway continuing along 8th Street.	Plainfield Township, Wind Gap Borough, Pen Argyl Borough

High-ranked gaps are still noted as regionally impactful and scored significantly during the gap analysis process described in the appendix of this document. These gaps still serve a large population, but may not connect to as many amenities, or may not be as shovel-ready as Critical or Elevated Gaps.



LEHIGH VALLEY SUPPORTING GAPS

Allen Township Trail

Spur from Nor-Bath Trail at Savage Road North to Howertown Park and south to residential cul-de-sac at 8th Street

Allen Township

East Allen Township Trail

Housing development along Hanoverville Rd to Nor-Bath Trail at Bicentennial Park

East Alen Township

Forks Township Trail Network

- Ramblewood Drive Trail
- Uhlers Crossing Network
- Two Rivers Trailway to Forks Trail Network
- Fox Run Rd to Easton Area Middle School
- Winchester Drive Trail

Forks Township

Hanover Township Trail Network

Business park on High Point Blvd to Orchard Ln along agricultural and residential property lines

Hanover Township (NC)

Institute Road Trail

Loop from Institute Drive to natural area

Upper Mt Bethel Township

Jordan Creek Greenway Trail

Trexler Nature Preserve to Leaser Lake

Lowhill Township, Weisenberg Township, Lynn Township

Saucon Region Trail Network

Upper and Lower Saucon Network

Upper Saucon Township, Lower Saucon Township

Saucon Region Trail Network

South Mountain Preserve to Upper Milford Township Line

Upper Saucon Township, Lower Saucon Township, Upper Milford Township, Salisbury Township

Twin Lakes

Loop from Totts Gap Road to natural area

Upper Mount Bethel Township

Two Rivers Trail 9(A)

Stockertown to Jacobsburg Environmental Education Center Trail

Stockertown Borough, Plainfield Township

Upper Macungie Township Trail Network

Three independent short trail connections between residential areas

Upper Macungie Township

Washington Township Recreation Complex

Washington Blvd to Ackermanville Road through Washington Township Recreation Complex

Washington Township (NC)

Whitehall Township Trail Network

- Ringer Road to Ironton Rail Trail
- Spruce St. to D&L Trail

Whitehall Township

Lower Macungie Trail Network

Various independent trail routes in Township. Proposed trail connection between southern terminus of Lehigh Parkway and Alburtis Trail Network through Lower Macungie Township and Macungie Borough

Lower Macungie Township

Macungie Trail Network

- Hills at Lock Ridge Trail to Locust Street.
- Route 100 to Lower Macungie Trail Network

Upper and Lower Macungie Township

Martins-Jacoby Watershed Trail Network

Loop trail and spurs through numerous Slate Belt communities

Portland Borough, Upper Mount Bethel Township, Lower Mount Bethel Township, Washington Township (NC), Forks, Township, Plainfield Township, Roseto Borough, Bangor Borough and East Bangor Borough

Minsi Lake Nature Trail

Connecting nature preserves north of Minsi Lake to existing nature trail around lake

Lynn Township

Nor-Bath Trail - Bath to Route 946

Regional connection between Bath Borough and PA Route 946 in Moore Township

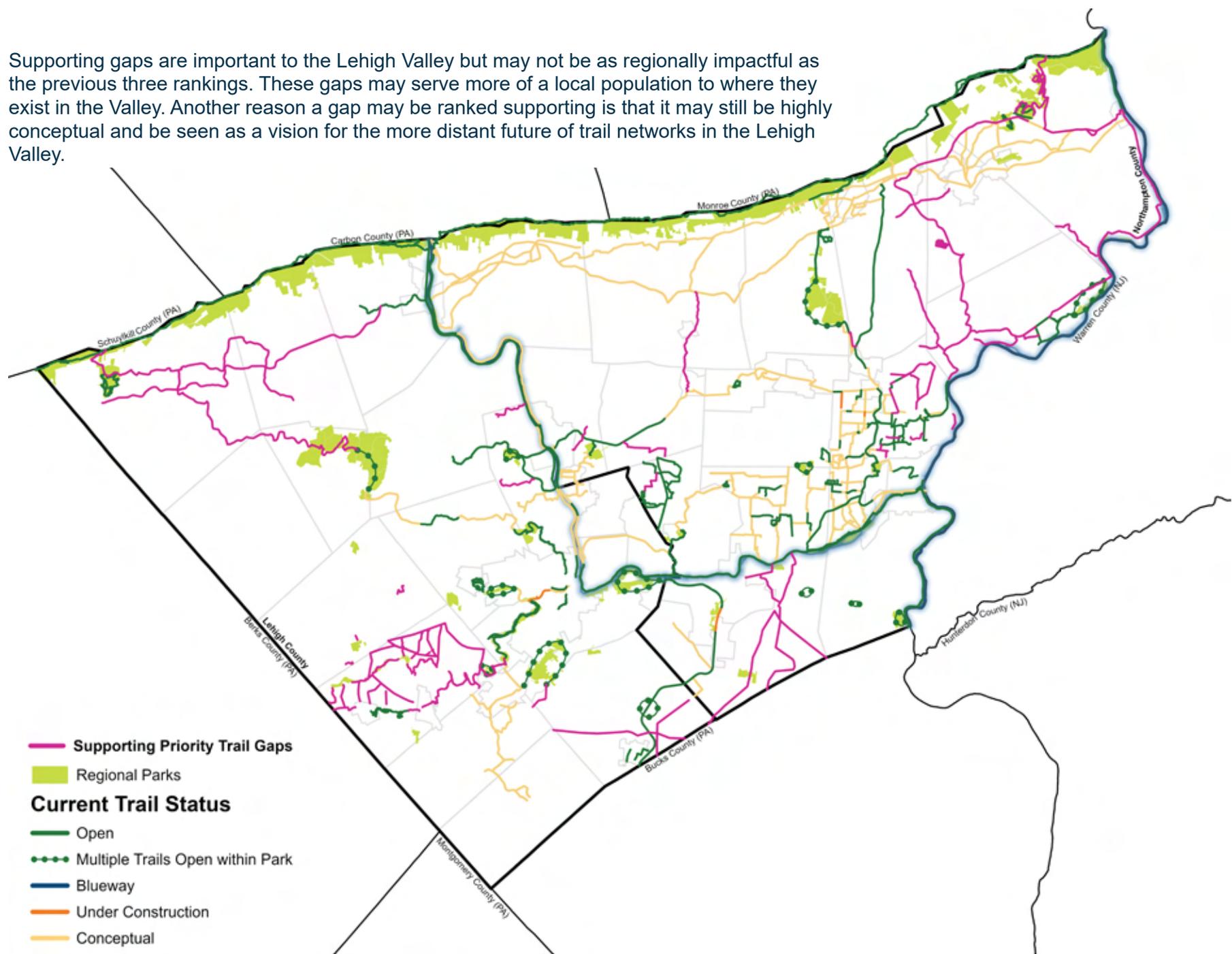
Moore Township, Chapman Borough, East Allen Township, Bath Borough

Northern Lehigh Rail Trail

Allemanengel Road to Slate Heritage Trail near Emerald Washington Township (LC) along rail right-of-way

Lynn Township, Heidelberg Township, Washington Township (LC)

Supporting gaps are important to the Lehigh Valley but may not be as regionally impactful as the previous three rankings. These gaps may serve more of a local population to where they exist in the Valley. Another reason a gap may be ranked supporting is that it may still be highly conceptual and be seen as a vision for the more distant future of trail networks in the Lehigh Valley.





Implementation Strategies

There are various strategies available for stakeholders to plan, finance and construct trail infrastructure.

To acquire funding, there are many grant programs available for stakeholders. Given that trails serve many purposes, from recreation to transportation, funding opportunities from a variety of agencies may be available depending on the type of project. Some potential funding opportunities for trails in the Lehigh Valley include:

Trail Funding Programs

PA Department of Conservation and Natural Resources (DCNR)

Community Conservation Partnerships Program (C2P2)

(PennDOT)

Transportation Alternatives Set-Aside (TASA)

(PennDOT)

Multimodal Transportation Fund (MTF)

PA Department of Community and Economic Development (DCED)

Greenways, Trails and Recreation Program (GTRP)

DCED

Local Share Account Grant programs

DCED

Multimodal Transportation Fund (MTF)

Pennsylvania Environmental Council (FEC)

Pennsylvania Water Trail Mini-Grants

Before acquiring funding to design or construct trails, local governments can utilize various planning tools to identify current and future trail needs. An initial step is to update comprehensive plans, as well as other specific plans, such as trail and active transportation plans, if possible. These planning documents examine land use trends and establish goals and strategies to help guide near and long-term community decision making.

Local government plans are the foundation of how a community envisions itself in the future. Goals and strategies from plans can be implemented through zoning code and subdivision and land development ordinance (SALDO) updates, as they can provide incentives for trail construction and set aside land for open space or recreation. Communities can also require trails and sidewalks through the subdivision and land development process. Adding a trail or sidewalk requirement in SALDOs is an effective way to improve trail connectivity while minimizing costs to taxpayers.

For example, the City of Allentown's SALDO requires properties proposed for subdivision or land development approval to provide a trail easement if one is identified on the property in an adopted trails plan.

Specific locations for future trail development can be identified by municipalities through creating or updating their official map. By identifying trails on an official map, municipalities can formalize and prioritize their intent to construct trails, which can be leveraged when pursuing funding sources for public projects. Utilizing these various planning tools allows municipalities to accommodate changing community priorities or other issues. Demonstrating a community's intent to develop or enhance trails through tools like plans and official maps helps trail projects more easily go from concept to reality.

To promote trail connectivity across municipal borders, local governments, community organizations and other stakeholders can participate in collaborative efforts.

Here in the Lehigh Valley, THE LINK, is a group of local governments, non-profits and advocates that work together to promote the region's trail network. Approaching trails from a regional lens encourages greater opportunities for connectivity, grant funding and usage of trails. Educational opportunities about trail planning and infrastructure are available in-person, through PennDOT Local Technical Assistance Program (LTAP) classes, held at the LVPC's office. In addition, there are many informational guides online, provided by the LVPC, WeConservePA, Pennsylvania Department of Conservation and Natural Resources and more.

Alignment with Regional Planning Efforts

The Trail Connection Strategy supports recommendations within existing initiatives such as *the Lehigh Valley Priority Climate Action Plan for Transportation Decarbonization* and *Walk/RollLV: Active Transportation Plan*. LVPC will begin updating *FutureLV: The Regional Plan* in 2026. Data updates have already been initiated for the Regional Plan, which will reference the findings of the Trail Connection Strategy.

The Trail Connection Strategy supports recommendations within the recently adopted regional climate resiliency plan,

Pathway to a Resilient Greater Lehigh Valley, by identifying active transportation as a strategy to reduce greenhouse gas emissions, vehicle travel and congestion, while improving local air quality.

This report also aligns with actions and strategies in the Lehigh County and Northampton County Livable Landscapes Plans, with key health and economic benefit findings of the 2014 Lehigh Valley Return of Environment Study, and the 2025 Northampton County Return on Environment Study.





Next Steps

This report highlights high priority conceptual trail connections, that have been identified in published planning documents. However, by looking at the regional map, there remain gap locations in the trail network where no conceptual trails are currently identified. This map can serve as a starting point for municipalities and planning agencies to identify future additional conceptual trail connections.

By first identifying future trail connections a community wishes to have in a plan, the process to eventually get it constructed can begin. Identifying conceptual trail connections in planning documents allows them to be elevated in reports such as this one and makes grant applications to implement them much more competitive.

Update of Trail Data and Gap Closure Information

The Lehigh Valley Planning Commission will implement an annual process to update regional trail network data and trail gap closure status. This process will incorporate information submitted by regional stakeholders, including,

but not limited to, municipal and county governments, transportation agencies, trail advocacy organizations, land management agencies, and other relevant public, private and non-profit partners.



Appendix and Resources

Methodology

Trail gaps in the Lehigh Valley's trail network were prioritized using a variety of different methodological factors. These factors are listed below with information about each one. Only trail gaps specifically identified within an adopted local or county active transportation or parks, recreation and open space plan were considered.

Trail Gap Evaluation Criteria

The following section outlines the full set of evaluation criteria used to assess regional trail gaps for planning, prioritization and funding purposes. Criteria draw upon federal, state, regional and local planning frameworks—including the Pennsylvania Municipalities Planning Code (MPC), Pennsylvania state transportation law, and U.S. Code Title 23—and align with adopted Lehigh Valley plans such as *FutureLV: The Regional Plan* and *Walk/RollLV: Active Transportation Plan*.

***FutureLV: The Regional Plan* Alignment**

Statutory Alignment

- Evaluate whether the project supports the goals of the Pennsylvania Municipalities Planning Code (MPC), relevant Pennsylvania state law, and 23 U.S.C. requirements for metropolitan planning.
- Flag projects that fail to meet any applicable federal, state or regional requirements.

Commuter Trail System Consistency

- Determine whether the trail gap falls within an identified Commuter Trail corridor as mapped in *FutureLV*.

Movement Between Centers

- Assess whether the proposed gap closure enhances movement of people between designated Centers, consistent with the plan's place-based strategy.

"Types of Places" Framework

- Confirm the project encourages linkages across all place types in the Valley.

Walk/Roll: Active Transportation Plan Alignment

Project Consistency

- Projects listed in *Walk/Roll/LV: Active Transportation Plan*.
- Additional assessment ensures the project remains consistent with the region's long-range multimodal vision.

Regional-Specific Criteria

Economic Impact Area (EIA) Location

- Determine whether the gap is located in an Economic Impact Area (EIA). A composite index of need based on energy, transportation, housing, health, workforce, pollution, water/wastewater and broadband indicators.

Sidewalk Inventory Relationship

- Assess sidewalk conditions and connectivity where applicable.
- Evaluated through geospatial analysis utilizing LVPC's Geographic Information System (GIS) sidewalk inventory layer.

Lehigh and Northampton Transportation Authority Transit Integration

- Identify if the project improves access to or from the public transit network.

Safety: Suspected Serious Injuries/Fatalities

- Use PennDOT pedestrian and bicycle crash data (suspected serious injuries and fatalities) from the Commonwealth's Traffic Information Repository.
- Aligns with the *Lehigh Valley Traffic Safety Plan* goal to reduce fatalities and serious injuries by 50% in 20 years.

Employment Connectivity

- Assess whether the gap closure improves access to employment centers.

School/Educational Connectivity

- Measure the connection to schools, colleges or educational institutions.

High Population Density

- Apply federal/state planning statutes weighting population density impacts.
- Evaluate whether the project falls within 10 minutes of a trail, consistent with DCNR priorities.

Population Affected by Gap Closure

- Utilize 1/4 mile buffer-based service area analysis.
- Identify methods for calculating non-resident users (e.g., employment density, community facilities, regional draw).

Pennsylvania Department of Conservation and Natural (DCNR) Resources Statewide Priority Trail Gaps

Statewide Gap Alignment

- Determine whether the project is identified as a priority trail gap by Pennsylvania DCNR.
- Compare DCNR priorities with regional gap mapping to assess overlap.

Connection to Public Recreational Facilities

Trails

- Evaluate direct connections to existing public trails.

Parks

- Confirm linkages to public parks; define parks within the document as publicly owned or publicly accessible recreational spaces.

Length of Trail Gap Segment

Short-Segment Prioritization

- Gaps less than five miles in length feasibility and cost-effectiveness.

Shovel Readiness

Existing/Proposed Project Status

- Identify whether the project appears as a conceptual trail or in prior inventories

Engineering & Design Completion

- Assign points based on level of design completion.

Permitting Status

- Evaluate whether necessary environmental and regulatory permits have been secured.

Funding Secured

- Assess any dedicated or committed funding sources.

Rights-of-Way (ROW) Status

- Identify whether ROW is acquired, under negotiation or unknown.

Tie-Breaker Use

- Applied shovel-readiness as a criteria.

RESOURCES & TOOLS

Key Partners



Delaware & Lehigh (D&L)
National Heritage Corridor



The LINK
Trail Network



Coalition for Appropriate
Transportation (CAT)



PA Department of
Transportation



Community Bike
Works (CBW)



Lehigh County
Parks & Recreation



Northampton County
Parks & Recreation



Lehigh Valley
Greenways



PA Department of
Conservation and
Natural Resources

Maps and Plans Referenced for this Strategy

DCNR Trail Map

Pennsylvania Trail Plan

Lehigh County Livable Landscapes

Northampton County Livable Landscapes

Future LV: The Regional Plan

Trail Implementation Grants

Pennsylvania Department of Conservation and Natural Resources Motorized Trails Grant

Pennsylvania Recreational Trails (PRT) motorized projects. PRT motorized projects include the development, rehabilitation or maintenance of designated routes on land for all types of motorized recreation activities, as well as the purchase or lease of equipment to be used exclusively for the maintenance or construction of land and water trails and trail-related facilities.

Pennsylvania Department of Conservation and Natural Resources Non-Motorized Trails Grant

Trail projects include the acquisition, planning, development, rehabilitation or maintenance of designated routes on land or water for non-motorized recreation activities, as well as the purchase or lease of equipment to be used exclusively for the maintenance or construction of non-motorized land and water trails and non-motorized trail-related facilities.

Pennsylvania Department of Conservation and Natural Resources Park Rehabilitation and Development Grant

These projects involve the rehabilitation and development of public parks, recreation facilities, greenways and river conservation projects.

Pennsylvania Department of Conservation and Natural Resources Land Acquisition and Conservation Grant

These projects involve the purchase and/or donation of land for park and recreation areas, greenways, critical habitat areas and/or open space.

Pennsylvania Department of Conservation and Natural Resources Community Recreation and Conservation Planning Grant

Planning projects study the needs, benefits and opportunities for future land acquisition, development and/or management of parks, recreational facilities, critical habitat, open space, natural areas, greenways and river/watershed corridors.

**Pennsylvania Department of Transportation -
Transportation Alternatives Set-Aside Program**

The federal Transportation Alternatives Set-Aside (TASA) provides funding for projects and activities defined as transportation alternatives, including on- and off-road pedestrian and bicycle facilities, infrastructure projects for improving non-driver access to public transportation and enhanced mobility, community improvement activities, environmental mitigation, trails that serve a transportation purpose and safe routes to school projects.

**Pennsylvania Department of Transportation
Multimodal Transportation Fund Program**

The program is intended to provide financial assistance to municipalities, councils of governments, businesses, economic development organizations, public transportation agencies, and ports and rail freight entities to improve transportation assets that enhance communities, pedestrian safety and transit revitalization.

**Pennsylvania Department of Community & Economic
Development Greenways, Trails, and Recreation
Program**

Projects which involve development, rehabilitation and improvements to public parks, recreation areas, greenways, trails and river conservation.

**Pennsylvania Department of Community & Economic
Development Multimodal Transportation Fund Program**

Funds may be used for the development, rehabilitation and enhancement of transportation assets to existing communities, streetscape, lighting, sidewalk enhancement, pedestrian safety, connectivity of transportation assets and transit-oriented development.

**U.S. Fish & Wildlife Service Highlands Conservation
Act Grant Program**

State agencies, counties and municipalities are eligible through this program to receive grant funds to acquire land that can be used for trail and greenway development.

**Department of Revenue - Redevelopment Assistance
Capital Program Funds**

RACP projects are authorized in the Redevelopment Assistance section of a Capital Budget Itemization Act, have a regional or multi-jurisdictional impact, and generate substantial increases or maintain current levels of employment, tax revenues, or other measures of economic activity.



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Special Thanks to Christian Martinez for his contributions drafting the Lehigh Valley Trail Connection Strategy and to Mackenzie Geisner for mapping and analysis.

**For more information
visit the LVPC website @ LVPC.org**



Lehigh Valley Planning Commission

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Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

March 25, 2026

Dear Community Partners,

We would like to alert you to an important piece of federal legislation that could provide major benefits to our local communities, as Congress looks to reauthorize transportation infrastructure funding. The current Infrastructure Investment and Jobs Act or Bi-Partisan Infrastructure Law ends on September 30, 2026 and is approximately 80% of all of the transportation funding for our region, and totaling over \$4.3 billion in the current *FutureLV: The Regional Plan*. Congress is working on reauthorization of this critical transportation funding law.

The reauthorization, currently titled, the Bridges and Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437) represents a practical, bipartisan solution to better align federal investment with the realities on the ground, but it will only pass if we let our Congressional delegation know how important this is to our region.

Local and county governments own and operate the majority of our nation's transportation network, yet they receive a disproportionately small share of federal funding. This imbalance has real consequences -- aging local bridges, deteriorating roadways and delayed safety improvements --- despite projects being planned, prioritized and ready to move forward. With costs rising and the Lehigh Valley growing rapidly, the need for more direct, reliable access to funding has never been greater.

The BASICS Act addresses these challenges by increasing investment in core programs, strengthening support for bridge repair and road safety, and ensuring a *greater share of funding reaches locally selected projects*. By enhancing transparency, streamlining delivery and empowering regional decision-making, the bill will help deliver safer, more efficient transportation systems that support economic competitiveness and quality of life.

Attached is a document with more details about the BASICS ACT, and a sample letter that can be sent to our legislative leaders. Feel free to weave any relevant details about your community into the letter.

We respectfully urge you to contact your federal legislative leaders to support H.R. 7437 to ensure federal transportation policy works where it matters most, at the local level.

Sincerely,

Becky A. Bradley, AICP
Executive Director, Lehigh Valley Planning Commission

Local Communities Can Support the **BASICS Act (H.R. 7437) Now**

Transportation funding across the United States is authorized by Surface Transportation legislation. Currently, the Infrastructure Investment and Jobs Act (IIJA) authorizes the US Department of Transportation to allocate federal dollars to transportation projects around the country, and it will expire on September 30, 2026. That's why it's imperative for local communities to support the Bridges And Safety Infrastructure for Community Success (BASICS) Act (H.R. 7437) a common-sense approach to federal transportation policy that puts safety, accountability and local delivery first by putting more money under local control.

At least 80% of all transportation funding in the country comes from the Surface Transportation legislation. In the Lehigh Valley, this federal funding is matched with state funds to allocate \$518 million to the region's transportation grid every four years. But with the region growing by more than 4,500 people a year and inflation driving up project costs, more local control of the funding is needed.

Why This Matters

Transportation is experienced locally and regionally, but it is nationally significant. People rely on locally owned roads and bridges every day to get to work, school, health care, and local businesses. These same networks support freight corridors and supply chains that move goods across communities and states.

Local and regional leaders understand these systems best. They know where investments will deliver the strongest safety and economic results.

Yet federal transportation policy has not kept pace with this reality. The disconnect is clear:

- Regions and local governments plan for, own, and operate **more than 75 percent of the nation's roads**
- Locally owned roads make up **43 percent of the Federal-Aid Highway System**
- **Locally owned roads carry 34% of the vehicle miles traveled** in the United States of America
- **Regions and local governments receive only ~16 percent of federal transportation funding**

Federal dollars remain concentrated on a narrow share of the system. This misalignment weakens safety outcomes, system performance, and economic competitiveness across urban and rural areas alike.

What's Broken

The mismatch between responsibility and funding has real consequences:

Local assets fall further behind

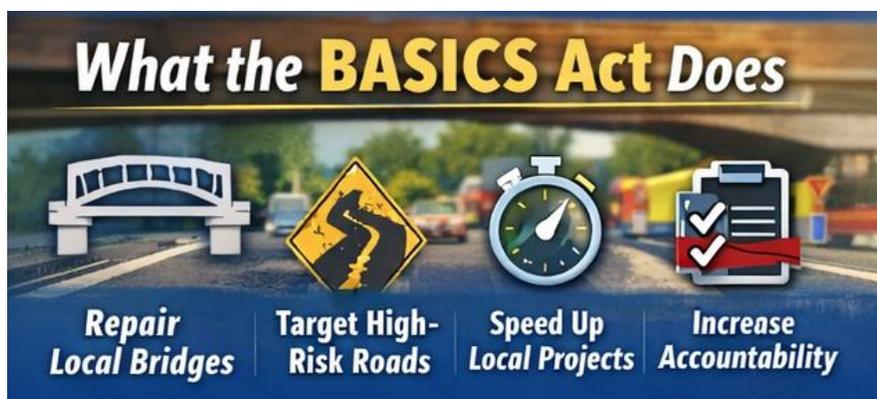
- **Nearly half of locally owned principal arterials are in poor condition**, compared with just 7 percent of similar state-owned roads
- **Locally owned roads and bridges are 2X more likely to be in poor condition** than state-owned facilities

Safety dollars miss the most dangerous roads

- **Over 85 percent of roadway fatalities** occur off the Interstate System
- Most federal highway dollars remain focused on a limited portion of the network

Projects are ready, but funding gets stuck

- Communities complete federally required project lists for transportation funding
- Local and regional projects are prioritized, vetted, and ready to move
- Funding is often delayed or redirected by administrative barriers and red tape outside local and regional control
- As a result, **critical safety and infrastructure projects remain unfunded or delayed**



BASICS – Bridges And Safety Infrastructure for Community Success Act (H.R. 7437)

America’s transportation system depends on a safe and reliable network of roads and bridges in every region of the country. [The BASICS Act](#) focuses federal transportation investment on core infrastructure needs by ensuring funding reaches communities efficiently and is used where it delivers the greatest public benefit.

What this bill does:

- **INVESTS IN REPAIRING BRIDGES:** Builds on the Bridge Formula Program to continue fixing the nation’s most deficient bridges, with a focus on both state- and locally owned infrastructure. Unlike prior approaches, the BASICS Act ensures that funding for locally owned bridges is proportional to the number of locally owned bridges in each state, directing resources to the worst-condition bridges regardless of ownership.
- **DELIVERS REGIONAL PRIORITY PROJECTS FASTER:** Metropolitan planning organizations (MPOs) are responsible for developing Transportation Improvement Programs (TIPs) that identify local priority projects that meet federal performance goals. The BASICS Act accelerates delivery of these regionally supported projects by increasing funding for the Surface Transportation Block Grant (STBG) program. As the most flexible federal transportation formula program, STBG allows states and regions to move projects forward efficiently and deliver tangible benefits for local businesses, workers, and communities in every congressional district.
- **FOCUSES ON ROAD SAFETY:** Nearly 100 people lose their lives on America’s roads every day. The BASICS Act strengthens the Highway Safety Improvement Program (HSIP) to confront this crisis head-on by increasing overall safety funding and preventing states from transferring HSIP dollars away from safety priorities. The bill also ensures that 25 percent of HSIP funding is delivered regionally in both urban and rural areas, giving local governments direct access to capital for proven safety projects and building on the success of the Safe Streets and Roads for All program.
- **ENSURES TRANSPARENCY AND COLLABORATION:** Federal transportation dollars must be accountable to taxpayers. The BASICS Act improves transparency around how funding flows, what resources are available to regions, and how projects advance from planning to delivery. By reinforcing collaboration across federal, state, regional, and local partners, the bill helps ensure projects move efficiently and deliver real results on the ground.
- **BUILDS STRONG PLANS FOR RURAL AND URBAN REGIONS:** The BASICS Act invests in planning capacity by strengthening Rural Transportation Planning Organizations (RTPOs) and increasing Metropolitan Planning (PL) funding. Strong planning leads to better project selection, faster delivery, and smarter investments, ensuring both rural and metropolitan regions can advance projects that reflect local priorities and long-term needs.

The BASICS Act ([H.R. 7437](#)) — Section-by-Section Summary *(Bridges And Safety Infrastructure for Community Success)*

Section 1. Short Title. Designates the bill as the “BASICS (Bridges And Safety Infrastructure for Community Success) Act.”

Section 2. Definitions. Provides definitions for terms used in the Act.

Section 3. Apportionment. Revises statutory percentages in §104(b)(1)–(3), (7), and (8), which govern the distribution of funding among core highway programs. These adjustments move funding from the rigid National Highway Performance Program (NHPP) and into the Surface Transportation Block Grant (STBG) program—the most flexible program that benefits states and local governments alike—and the safety-focused Highway Safety Improvement Program (HSIP). **This increases flexibility and reflects the fact that data show that States routinely transfer funding from NHPP into STBG.**

Additionally, this section increases funding for metropolitan planning (PL) and creates a new funding stream for regional transportation planning organizations (RTPOs) to ensure that all areas, regardless of population, have access to high-quality, federally funded planning assistance.

Finally, this section continues the successful Bridge Formula Program from the Infrastructure Investment and Jobs Act (IIJA) under a new name, the Strengthening Bridges Formula Program, which is added to the core formula programs.

Section 4. Surface Transportation Block Grant Program. Improves transparency and strengthens local involvement by requiring States to consult with local governments before obligating STBG suballocated funds in areas under 50,000 that are not represented by a regional transportation planning organization. This ensures that State programming in small and rural areas reflects local priorities and needs.

Section 5. Strengthening Bridges Formula Program. Continues the Bridge Formula Program from the IIJA as a new core formula program—section 180 of title 23—called the “Strengthening Bridges Formula Program.” Funding would be divided among States based on need, keeping the \$45 million minimum apportionment from the IIJA. Unlike the IIJA however, this new program would require States to suballocate 25 percent of funding to areas based on population. This ensures that local governments, which own an outright majority of poor condition bridges, are guaranteed access to funding to repair or replace these assets. The program would also include a robust requirement that suballocated funds be used for projects selected by regional planning organizations and local governments.

This program would continue key set-asides from the IIJA and maintain the 100 percent federal cost share for off-system bridges owned by Tribal or local governments.

Section 6. Highway Safety Improvement Program. Strengthens local and regional access to safety funding by requiring States to suballocate 25 percent of HSIP funds using the same population-based structure as STBG and the new bridge program. Apportionment changes in section 3 of this bill ensures that the new suballocation requirements **do not take away from safety funding available to States.**

Project selection follows the same framework used in Section 5, ensuring that MPOs, RTPOs, and local governments remain central to identifying safety priorities consistent with federal requirements and national goals. The section also ensures that locally led safety projects are eligible for HSIP funding.

Section 7. Transferability. Currently, only suballocated funding under STBG and PL funds are exempt from transferability. This section ensures that all suballocated dollars, under both existing programs (the

Carbon Reduction Program) and new programs/programs with new suballocation requirements (HSIP, Strengthening Bridges Formula Program), are protected from transfer.

Second, this section adds in a requirement that States can only transfer HSIP dollars after first making them available competitively to local governments. Given our ongoing road safety crisis, we should not be transferring safety funds without ensuring all safety needs have been met.

Section 8. Project Selection. Expresses the sense of Congress that suballocated funds under STBG, HSIP, the Carbon Reduction Program, and the new bridge formula program should be obligated only to projects selected locally and regionally. **This reaffirms Congress’s long-standing intent that suballocated funding be programmed through regional and local decision-making structures, consistent with the consultation and coordination requirements of title 23.**

Section 9. Metropolitan Planning. Strengthens the metropolitan planning program to better support federally required planning activities and advance timely project delivery. The section provides a 100 percent federal share for PL funds so that metropolitan planning organizations can meet statutory planning responsibilities and minimize administrative delays. It also updates and modernizes eligible uses of planning funds to reflect the full lifecycle of project development, including activities such as early scoping, data and modeling improvements, and multimodal systems planning.

Finally, the section directs the Secretary to establish a voluntary pathway for MPOs to become direct recipients of planning funds, promoting administrative efficiency, reducing pass-through delays, and supporting more streamlined project development. It also requires the U.S. Department of Transportation to provide MPOs access to federal financial management systems, improving transparency and accountability.

Section 10. Rural Transportation Planning. Establishes a dedicated rural and nonmetropolitan planning program under section 135(n) to support statewide rural engagement and strengthen the capacity of RTPOs and other regional entities. States must distribute funds through a formula for federally designated RTPOs and a competitive grant process for non-federally designated regional planning entities, subject to Secretarial approval. The section guarantees a minimum allocation of \$300,000 per year for each designated RTPO and provides a 100 percent federal share for all activities carried out under the program, ensuring consistent planning capacity across rural areas.

[INSERT COUNTY LETTERHEAD]

[DATE]

The Honorable [FIRST NAME, LAST NAME]
U.S. House of Representatives/U.S. Senate
[ADDRESS LINE 1]
[ADDRESS LINE 2]

Dear Senator/Congressmember:

On behalf of [COUNTY/BOROUGH/PARISH NAME], [I/we] write in support of the Bridges. And.Safety.Infrastructure.for.Community.Success.(BASICS).Act.(H.R. 7437). This bipartisan bill would make significant improvements to federal transportation programs to help more counties like [mine/ours] access formula funding for crucial transportation projects.

Counties are crucial players in our nation’s surface transportation systems, owning 44 percent of public road miles and 38 percent of bridges. This includes 27 percent of Federal-aid highway miles and thousands of “on-system” bridges. Here in [COUNTY/BOROUGH/PARISH NAME], we own [NUMBER] miles of public road and [NUMBER] bridges. These assets are integral parts of our regional transportation system, connecting communities and moving the people and goods that power our economy.

Despite our significant ownership and responsibilities, counties struggle to reliably access federal formula transportation dollars, which comprise the bulk of federal transportation spending. Analysis shows that all local governments, not just counties, receive less than 15 percent of federal formula funding. This limited access to formula funding – coupled with rising input costs, capacity constraints and state-imposed financial restrictions – has created significant disparities in the condition between county-owned and other locally owned infrastructure and state-owned infrastructure. Nationally, for example, locally owned bridges are twice as likely to be classified as being in “poor condition.” [HE TRUE] These trends are reflected in my county, where we own [34.9% in Lehigh County, 30.3% in Northampton County] percent of all poor condition bridges located in the county.

The Bipartisan Infrastructure Law (BIL) made record investments in transportation infrastructure, but due to most of the funding moving through the formula program, many counties did not reap the benefits. In the next surface transportation reauthorization bill, counties need more reliable access to formula dollars to work to reduce these disparities and invest in the important assets that we own and maintain.

The bipartisan BASICS Act provides a strong framework for how to do that. This bill, which is endorsed by organizations representing thousands of local government leaders – including the National Association of Counties and the National Association of County Engineers – would increase the share of federal formula funding that is available to

counties while also making necessary process improvements to ensure formula funds reach locally selected projects.

Specifically, this bill would:

- Grow the versatile Surface Transportation Block Grant (STBG) program, which provides flexible funding that benefits both states and locals.
- Provide counties and other local governments with access to federal formula funding for bridges and safety infrastructure.
- Support metropolitan planning organizations and fortify project selection authority to ensure locally selected projects properly advance with federal funding.
- Fund rural/regional transportation planning organizations to boost the capacity of rural counties and improve their access to formula funding.
- Strengthen the intergovernmental partnership by promoting increased coordination between states, counties and other units of local government.

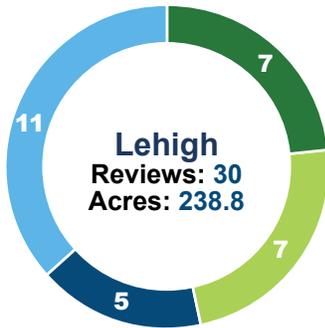
[I/we] believe that the provisions in the BASICS Act are important for ensuring that counties retain a baseline level of access to federal funding in the next reauthorization bill, especially if there will be an emphasis on consolidating discretionary opportunities and prioritizing formula funding. Importantly, [I/we] counties and states are partners in delivering infrastructure, not competitors for resources. [I/we] believe that Congress can and should develop a bill that keeps states whole while improving access for counties and other local governments.

As Congress continues to develop the next surface transportation reauthorization bill, [I/we] urge you to cosponsor H.R. 7437 and to ask leadership in the House Transportation & Infrastructure Committee to include provisions from the BASICS Act in its base text.

Sincerely,

[YOUR NAME]

PLAN ACTIVITY BY COUNTY



REGIONAL TOTALS*	
10	Subdivision/Lot Line Adjustments
16	Development
14	Stormwater Management
5	Municipal Ordinances, Maps and Plans
301.4	Acres
<small>*Includes preliminary and final plans</small>	

RESIDENTIAL DEVELOPMENT

105 Total Units

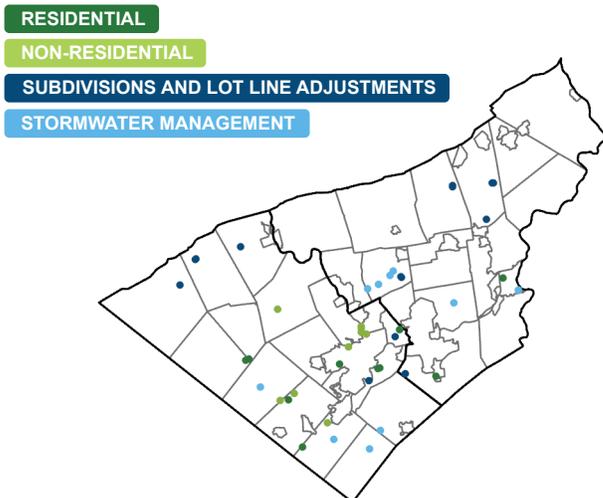


NON-RESIDENTIAL DEVELOPMENT

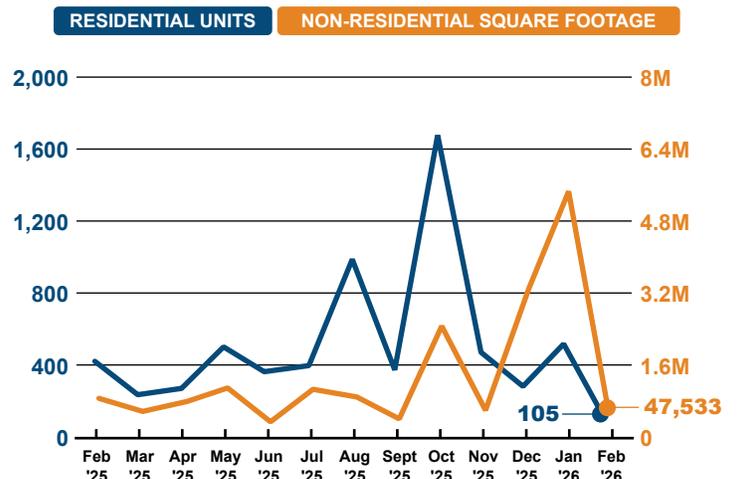
47,533 Total Square Feet



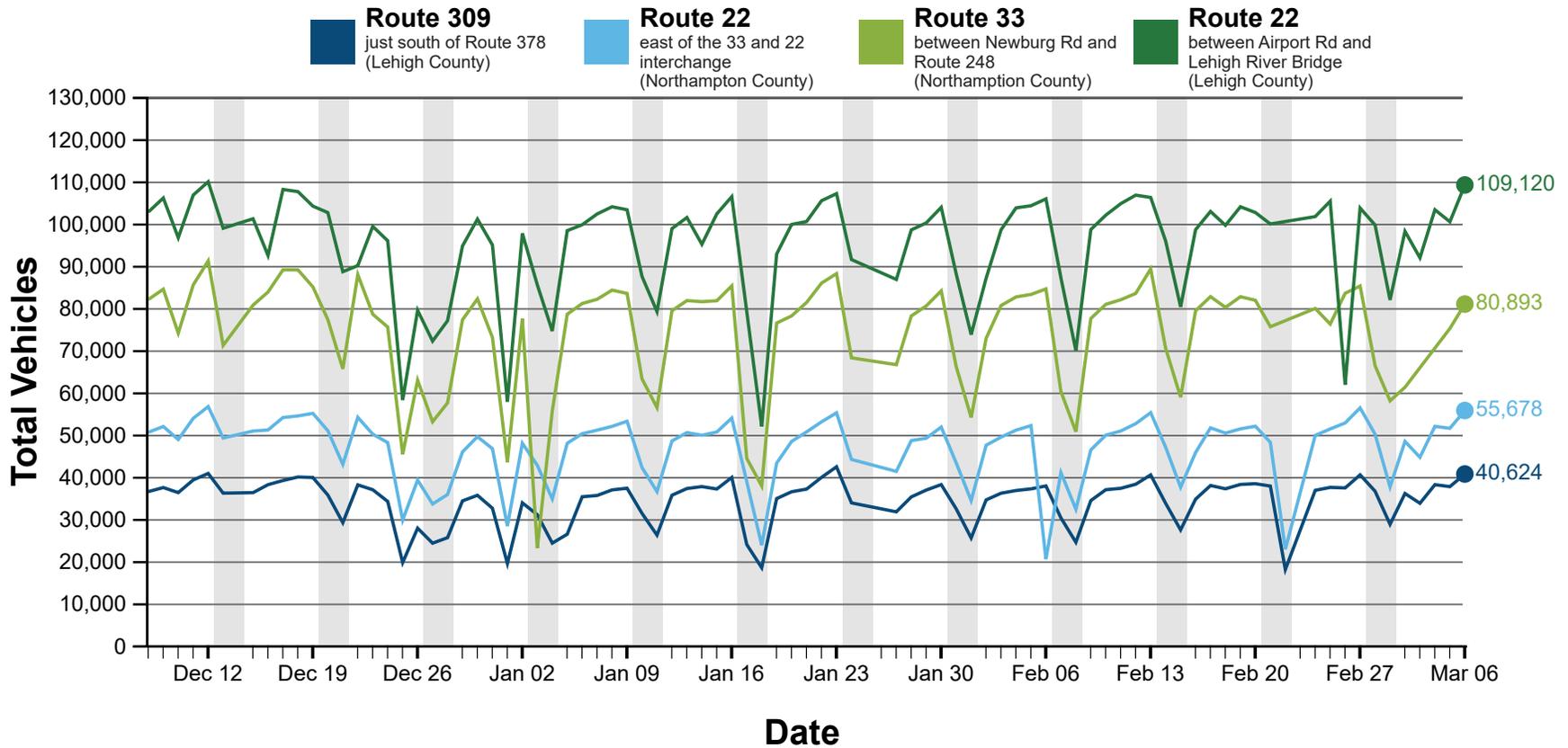
LOCATION OF DEVELOPMENT



YEAR-TO-DATE (YEAR-TO-YEAR)

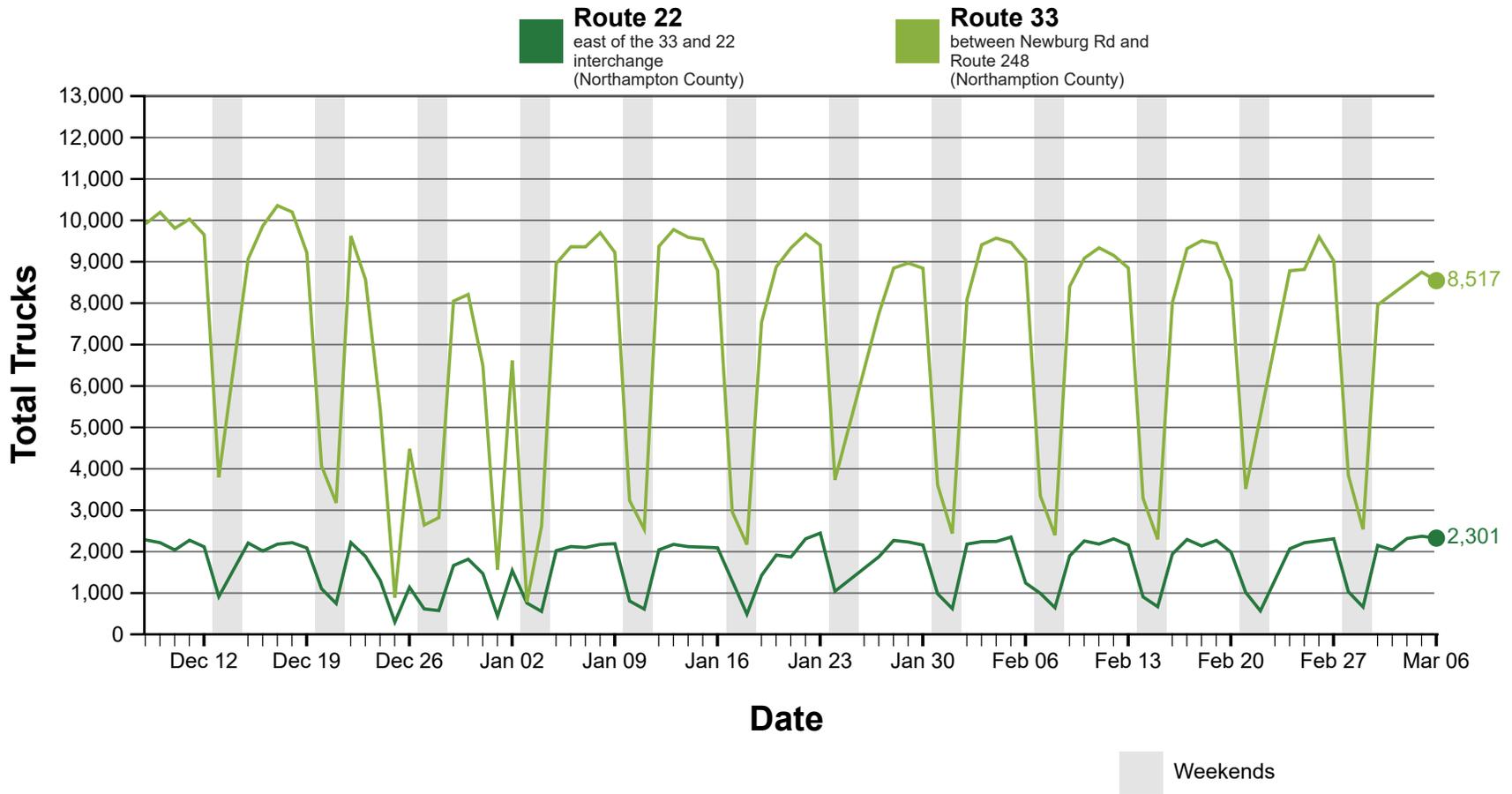


Traffic Volumes Throughout the Lehigh Valley



*Data from Dec/8/2025 - Mar/6/2026 at daily intervals

Truck Volumes Throughout the Lehigh Valley



**Data from Dec/8/2025 - Mar/6/2026 at daily intervals*



Lehigh Valley Planning Commission

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Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

MEMORANDUM

DATE: March 10, 2025
TO: Lehigh Valley Planning Commission
FROM: Hannah Milagio, Regional Planner for Community Engagement
REGARDING: Public Engagement, Education and Grants

Public Engagement

The most recent **Plan Lehigh Valley National Public Radio** show, which aired at 6:30 pm, March 2 on WDIY radio 88.1 FM, took a look at the 2025 LVPC Annual Report, with a focus on the BuildLV Development data and trends. Co-hosts Becky Bradley and Matt Assad welcomed as the guest, LVPC Chief Community and Regional Planner Jill Seitz, who discussed the diversity of housing now being proposed and news trends in the industrial development market. The podcast is now streaming at www.wdiy.org/show/plan-lehigh-valley and www.lvpc.org/news/v. The next Plan Lehigh Valley show will air Monday, April 6 at 6:30 pm.

Lehigh Valley Government Academy (LVGA)

PA Municipal Planning Education Institute (PMPEI)

The following courses will be taught in-person at the LVPC Offices. Registration for these courses can be found at www.lvpc.org/lvga

Community Planning

What: This is a course to teach planning commissioners, local officials and others how to carry out their responsibilities under the PA Municipalities Planning Code (MPC), the statute that endows municipalities with the authority to plan. For those who don't know or fully understand the provisions of the MPC, this course will teach them how instrumental it is in giving a jurisdiction the ability to make critical decisions involving land use, which can shape their community's quality of life.

When: April 7, 14, and 21; 5:30 pm to 9 pm

Subdivision and Land Development

What: This course explored the work of planning commissions in the subdivision and land development review process, from pre-application meetings through project completion. The course was organized into three major sections: principles of subdivision and land development regulation and ordinance requirements; subdivision and land development review procedures; and design and technical standards of subdivision and land development. Participants received hands-on experience reviewing plans and designing alternative solutions.

When: May 6, 13, and 20; 5:30 pm to 9 pm

Local Technical Assistance Program (LTAP)

The following LTAP Classes will be held **in-person at the LVPC Office**. More information and registration can be found at <https://gis.penndot.gov/LTAP/default.aspx>

Public Works Safety

What: This webinar provides a basic understanding of common safety factors and practices associated with public works road maintenance operations. Specific operations discussed include trench excavation, crack sealing with hot asphalt, mowing and chain saw use, as well as winter maintenance. It provides an overview of why accidents happen and how to protect personnel through the use of personal protective equipment. Workplace awareness is stressed with emphasis on chemical safety, environmental hazards, and vehicle and equipment safety issues. The importance of having a formal safety program in place and how to establish an effective program is discussed.

When: Tuesday, April 7, 8 am to noon

Asset Management

What: Many municipalities in Pennsylvania employ some sort of asset management, whether it is properly planning for road maintenance or using an advanced database system to manage signs, roads, bridges, and even park benches. This course will explore the variety of asset management systems and approaches used throughout Pennsylvania and help municipal officials determine the right level of asset management for their needs. Participants will enhance their knowledge of asset management systems and their benefits to municipalities.

When: Tuesday, April 28, 8 am to 2:30 pm

All LVGA LTAP classes are free and are intended for municipalities, transportation non-profits and organizations with a transportation purpose. LTAP enables many practitioners who need courses with professional development hours (PDHs) to earn credits for maintaining their licenses and certificates.

Anyone can register at www.gis.penndot.gov/LTAP or by contacting Hannah Milagio at hmilagio@lvpc.org or 610-264-4544

Grant Opportunities

PA Department of Environmental Protection (DEP): Alternative Fuels Incentive (AFI) Program

AFI has approximately \$5 million in funding available to school districts, municipalities, nonprofit organizations, and businesses in Pennsylvania that want to transition to cleaner fuel transportation. Applicants will be eligible for a maximum grant award across all applications of \$500,000. Individual application awards are still capped at \$300,000.

Application Deadline: There will be two application acceptance periods for the 2026 program. The first acceptance period ends on **April 1, 2026, at 12:00 PM**. The second acceptance period

ends on October 7, 2026, at 12:00 PM. More information is available at <https://www.pa.gov/agencies/dep/programs-and-services/grants-loans-rebates/alternative-fuels-incentive-grant>

PA Department of Conservation and Natural Resources (DCNR): Community Conservation Partnerships Program (C2P2)

This grant program, managed by the DCNR Bureau of Recreation and Conservation (BRC), builds connections between Pennsylvanians and the outdoors by supporting recreational improvements, natural resource conservation, and community revitalization efforts. C2P2 projects "lay the groundwork" for future land acquisition, development and/or management of parks, recreational facilities, critical habitat, open space, natural areas, greenways; and river, stream, and waterway watersheds.

Applications must be received by April 30 at 4 PM. More information is available at <https://www.pa.gov/agencies/dcnr/programs-and-services/grants/community-conservation-partnerships-program-grants>

PA Department of Community and Economic Development (DCED): Multimodal Transportation Fund

The Multimodal Transportation Fund provides grants to encourage economic development and ensure that a safe and reliable system of transportation is available to the residents of the commonwealth. Funds may be used for the development, rehabilitation and enhancement of transportation assets to existing communities, streetscape, lighting, sidewalk enhancement, pedestrian safety, connectivity of transportation assets and transit-oriented development.

Applications for the Multimodal Transportation Fund are accepted annually between March 1 and July 31. **All applications and all required supplemental information must be electronically submitted by close of business on July 31st.** More information is available at <https://dced.pa.gov/programs/multimodal-transportation-fund/>