



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING Tuesday, June 25th, 2024, 12:00 noon AGENDA

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

Roll Call

Courtesy of the Floor

Ordinance/Plan Reviews and Information:

1. *ACTION ITEM*: Fountain Hill Borough – Land Use of Regional Significance – Fountain Hill Elementary School (JD)
2. *ACTION ITEM*: City of Allentown – Land Use of Regional Significance – Peregrine Tower (JD)
3. *ACTION ITEM*: City of Easton, Palmer Township and Wilson Borough - Land Use of Regional Significance – Easton Commerce Park (JS, SM, BH)
4. *ACTION ITEM*: Forks Township – Zoning Ordinance Amendment – Employment Center/Mobile Home District Uses (JS)
5. *INFORMATION ITEMS*: Upcoming Planning Projects
 - a. Regional Housing Supply and Attainability Plan
 - i. Data Analysis Underway
 - ii. Scheduling Focus Groups for the Fall
 - b. Equity Data Updates
 - i. Ongoing as new data is available
 - ii. Included in the LVPC Website overhaul of DataLV underway now

Next Comprehensive Planning Committee Meeting:
July 23, 2024, at 12:00 pm



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June XX, 2024

Ms. Amy Burkhart, Manager
Fountain Hill Borough
941 Long Street
Fountain Hill, PA 18015

**Re: Fountain Hill Elementary School – Land Use of Regional Significance
Fountain Hill Borough
Lehigh County**

Dear Ms. Burkhart:

The subject application proposes to demolish an existing elementary school and construct a new 87,000-square-foot elementary school at 1330 Church Street (PIN 642619755233). New bus loading and student drop-off areas, vehicle parking and outdoor play areas for students are intended to accompany this proposal.

The LVPC will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

- LVPC Comprehensive Planning Committee Meeting
 - June 25, 2024, at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - June 27, 2024, at 7:00 PM
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The LVPC provides the following comments as of the date of this communication:

Background

The parcel currently features the three-story Fountain Hill Elementary School with associated playground areas and parking. Demolition of the property will include all existing and associated building infrastructure, walkways and utilities. The project is within the Medium-High Density Residential (MHD-R) Zoning District and is a special exception use according to Fountain Hill Borough Zoning Ordinance §27-306.

Redevelopment

The LVPC commends the proposed redevelopment of a parcel located in the Development area, as identified in the General Land Use Plan of *FutureLV: The Regional Plan*. The proposal supports reuse and redevelopment within urban areas (of Policy 1.1). These areas have most or all of the factors needed to support growth, and can accommodate additional development, and the availability of a variety of transportation modes makes the site highly accessible (of Policy 2.1).

In addition to construction of a larger school building, the redevelopment includes construction of a 'Family Center and Food Pantry', supporting cultural and social programs (of Policy 5.2). Additionally, the proposal to expand community and educational opportunities in Centers and along Corridors improves equity and increases access to daily needs for all people (of Policy 4.3 and 5.2).

Site and Emergency Access

Access to the school is currently provided to a staff lot with 48 parking spaces with an ingress-only access to Norway Place and an egress-only access to Church Street, opposite of the intersection with Forrest Street. Parents are encouraged to drop-off/pick-up students along the South-side of the property on Moravia Street, with bus drop-off/pick-up along Church Street to the north.

The existing parking lot area will be reduced to 30 parking spaces; however, two additional lots will be added to the property. The total parking spaces will be increased from 48 to 51 spaces. Signs should be provided to designate whether these parking spaces are for employees only or open to parents and visitors. One of the new parking lots is to service the proposed Family Center and Food Pantry with nine spaces, and the eastern-most parking area will be increased to 12 spaces.

The addition of 127 feet to the bus storage area along Church Street and the 73 feet of new bus storage along the western staff parking lot will help decrease disruptions to traffic flow with less crowding of buses in the Church Street driving lane.

On-Site Movements

The moving of the egress access on Church Street away from the intersection with Forrest Street may increase the number of contact points for crashes along church street by adding an additional intersection. Sightlines from the egress should also be reviewed when buses are in the storage areas, as the view may become blocked, leading to drivers pulling into and blocking the crosswalk.

The LVPC recognizes the inclusion of three Americans with Disabilities Act (ADA) compliant parking spots on the proposed plan. One more spot should be considered in the Eastern Staff Parking Lot/Loading area.

Transportation Network Mobility & Multimodal Considerations

Designating Church Street from Norway Place to Garden Street as a School Zone is a commendable effort to 'promote safe routes to schools and playgrounds' (of Policy 5.2).

The proposed signage limiting Church Street, from Norway Place to Greene Court, to bus traffic only from 8 am to 9:30 am and 2:30 pm to 4 pm should also note the days and dates enforced, leaving the street open for all traffic during weekends and off-months. The egress from the western staff parking lot empties onto Church Street and staff member access should be considered during the two identified time blocks.

There are plans to remove the crosswalks located across Church Street at its intersection with Forrest Street. Signage should be posted, re-directing students or employees who walk to school. Some of these individuals may be used to crossing at Forrest Street and may still attempt to do so without crosswalks.

A large percentage of students walk to and from school as well as some parents and teachers. The LVPC commends the inclusion of new crosswalks, sidewalks, and ADA compliant ramps to help all persons navigate the property and promote safe routes to schools and playgrounds (of Policy 5.2).

While the Lehigh and Northampton Transportation Authority (LANTA) does not provide transit service directly to the project site, the site is located near existing bus routes 103 and 327 that run on Broadway, less than ¼ mile north of the school property. Sidewalks and pedestrian infrastructure facilitate access to the bus stops and promote safe and secure community design (of Policy 5.1).

The LVPC commends the inclusion of wayfinding signage in the surrounding neighborhood to make navigating the area easier for parents and students.

Sustainability

The LVPC encourages educational institutions to incorporate sustainable building practices that help reduce climate change impacts while furthering academic endeavors related to these technologies, enhancing the campus setting and demonstrating environmental leadership within the region (of Policy 3.4). Sustainable features such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing also reduce overhead operational costs and ‘minimize environmental impacts of development’ (of Policy 3.1).

The developer should also seek opportunities, where possible, to utilize existing infrastructure and reuse construction materials to ‘encourage reuse, sustainable building, site design and community design practices’ (of Policy 3.4).

The implementation of Electric Vehicle (EV) chargers could be considered along Church Street within the bus transport area, as well as in the staff parking lots. This would ‘incorporate environmentally sensitive transportation technologies’ as the transition to electric buses and other EVs is increasing (of Policy 3.4).

Landscaping

The LVPC commends the inclusion of landscaping throughout the project site. In a developed urban area, comprehensive landscaping and the proposed ‘Nature Play Area’

is essential to providing the community with access to green spaces that promote physical and mental health (of Policy 5.3).

Coordinating Land Use Decisions

Representatives of adjacent municipalities have been copied on this letter to ‘coordinate land use decisions across municipal boundaries’ (of Policy 1.4).

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

Please feel free to reach out if there are any questions.

Sincerely,



Joey Dotta
Regional Planner



Evan Gardi
Transportation Planner



Jillian Seitz
Chief Community and Regional Planner

cc: Bethlehem Area School District, Applicant; Terraform Engineering, LLC; Terry P. DeGroot, Project Engineer/Surveyor; Jill Smith, Borough Engineer; Kerry Rabold, Salisbury Township Planning Officer; Darlene Heller, City of Bethlehem Planning Director; Stacy Werkheiser, Lower Saucon Township Administrative Assistant

June 07, 2024

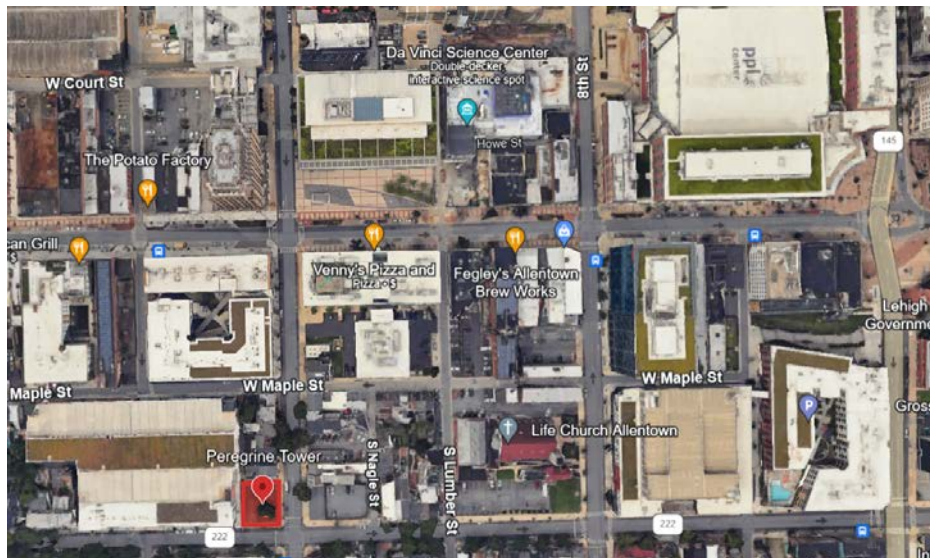
Ms. Jennifer Gomez, Director of Planning and Zoning
City of Allentown
435 Hamilton St.
Allentown, PA 18101

**Re: Peregrine Tower – Land Use of Regional Significance
City of Allentown
Lehigh County**

Dear Ms. Gomez:

The subject application proposes constructing a 37-story building with 206 residential units, 2,651 square-foot of retail and 9,953 square-foot of office space. The proposed uses by floor are retail space on the first and fourth floors, office space on the second, third and fourth floors, residential from floors six to either 33 or 37 and a restaurant on the top floor. There are a conflicting number of stories detailed on the plan set. It is recommended that the applicant clarify whether the proposed building is to be 37 stories, or 33 stories as noted in the statement of intent.

The project parcel is currently undeveloped with proximity to the Allentown Parking Authority Maple Street Parking Garage and multiple single-family attached residences. According to the Allentown Official Zoning Map, the parcel is zoned as Central Business District (B-2) and is a permitted use. This project was previously reviewed by the Lehigh Valley Planning Commission (LVPC) in 2015.



Google Earth Aerial Imagery



Google Earth Aerial Imagery

The LVPC will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

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 - June 25, 2024, at 12:00 PM
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The LVPC provides the following comments as of the date of this communication:

Dense Development

The LVPC recommends the developer clarify the proposed height, in feet, of the building. Additionally, it is recommended that the developer provide shadow diagrams to determine how lights and shade impact surrounding lower-scale buildings and public spaces.

The proposed height of 33 to 37 stories greatly surpasses the surrounding properties and would surpass the nearby, 22-story PPL Tower in height by 11 to 15 stories. If constructed at 37 stories, this project would be the tallest building in Pennsylvania, outside of the cities of Pittsburgh and Philadelphia, and would be 16 stories more than the old Martin Tower site. Because the height of the building would exceed anything in the city and region, careful consideration should be given to the interplay between density and the surrounding community. While the proposal supports a strategy of *FutureLV: The Regional Plan* to increase density in urban areas using infill development (Density Special Section, page 71), its height comparable to adjacent buildings must 'promote context-specific design solutions' (*FutureLV: The Regional Plan*, of Policy 5.4).

According to the General Land Use in *FutureLV: The Regional Plan*, this parcel is in a Development area and has many of the factors needed to support growth, such as sewer and transportation infrastructure capacity and contiguity to existing development, assuming there is capacity. It is unclear if this is the case and the LVPC supports the city and various partners from the Lehigh County Authority to the Pennsylvania Department of Transportation to seek answers to the specifics of infrastructure impacts. It is critical that specific factors to accommodate additional development of this scale exist.

The concern that a 33 to 37-story structure would not be wholly compatible with the adjoining neighborhood remains. In particular, the proposed project is in a Traditional Neighborhood Development (TND) Overlay District which urges similar heights between new construction and the existing adjacent structures (City of Allentown Zoning Ordinance §660-51). The developer should work closely with the city planning team to better understand impacts, if not already underway. This is an excellent opportunity to organize a community and region-supportive development that minimizes or eliminates externalities. Facade design, for example, can greatly reduce the dark tunnel effect of a building this tall on the neighborhood.

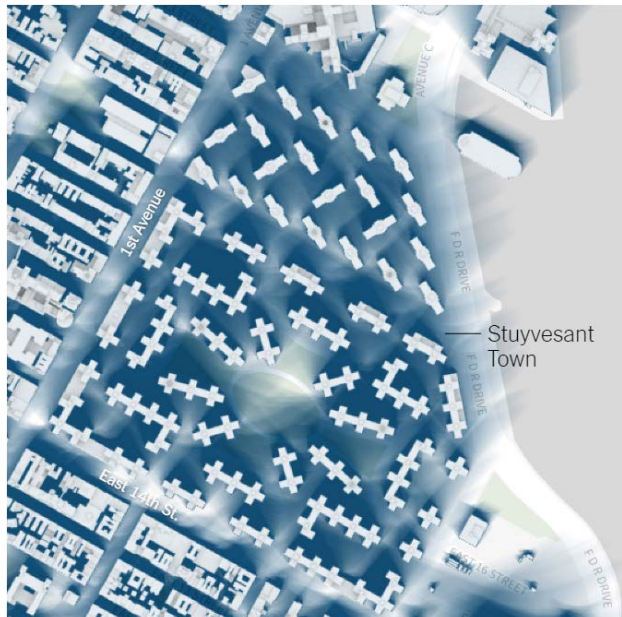
New York Times reporters Quoc Trung Bui and Jeremy White have noted:

“Sunlight and shadow shape the character and rhythm of [sic] public spaces. They have the power to control the flow of foot traffic on our city streets and decide which plazas hum with activity and commerce and which stay barren and desolate. And probably most noticeably, they have the power to change the rent.”

Their conclusion is drawn from a series of light and air studies developed for New York City, during winter, spring, summer and fall, as an example of how the effect of a building’s height can significantly alter the character and even the economic potential of a community.



One World Trade Center is roughly 175 stories, standing at 1776 feet with its towers. Its shadow in winter extends into the Hudson River a significant distance. *Image from the New York Times.*



Stuyvesant Town’s 13 story apartment towers create incredibly dark shadows in winter, blocking most of the light at the base of the structures and shading the park. *Image from the New York Times.*



Broadway, West 42nd, 7th and 6th Avenues, along with Bryant Park have virtually no natural light coming to street level during winter. Image from the New York Times.

All-in-all, with the increasing number of taller buildings in the City of Allentown, it is imperative that impact analysis, especially related to height, façade design and setbacks be required for developments at the scale of the current proposal.

While the Downtown Allentown Master Plan from 2014 identifies this parcel as potential catalyst site for future office and residential development, it also includes a recommendation that new development in the Neighborhood Transition area along Walnut Street adhere to height and setback regulations and have a façade no more than 240 feet (Downtown Allentown Development Plan, Page 68). This further reinforces the need for further collaboration and study.

Housing

The proposed building includes 206 residential units. To support ‘attainable housing in locations that maximize social and economic opportunities’ (*FutureLV: The Regional Plan*, Policy 4.5), the LVPC recommends that the cost of affordable housing for this area be taken into consideration. The proposal is within Census Tract 97, which encapsulates much of the Downtown Allentown neighborhood. According to

the Census’s 2023 5-Year American Community Survey (ACS), residents in this area earn a median yearly income of \$32,507 and pay a median rent of \$993 before utilities. An estimated 47 percent of renter households in this neighborhood are cost-burdened which means that they pay at least 30 percent of their monthly income on housing costs. The LVPC recommends that the developers consider the affordable housing needs of the surrounding community when determining rent costs.

Streetscape Improvements

The proposed improvements, like crosswalk markings and the replacing of street signs, at the Ninth Street and Walnut Street intersection are commendable efforts to ‘promote safe and secure community design’ (*FutureLV: The Regional Plan*, Policy 5.1). It is recommended that the intended use of the curbside area at the building entrance on Ninth Street be clarified. If it is intended to be used for delivery, then the developer should ensure that there is adequate space for delivery trucks.

Sustainable Systems

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and ‘minimize environmental impacts of development’ (*FutureLV: The Regional Plan*, Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing. Incorporating sustainable practices to help to ‘reduce climate change impacts’ (*FutureLV: The Regional Plan*, Policy 3.4).

Conclusion

The preliminary plan review stage provides opportunity for municipalities and developers to work together to arrive at community-supportive and enhancing projects. In this case, it's particularly necessarily, with the proposed construction of the Lehigh Valley's tallest building. By comparison to the 35 tallest buildings in Philadelphia, 10 are 30 stories or more.



It is critical to understand the potential impacts of a building between 33-37 stories. Above are examples of buildings in Center City and West Philadelphia as a basis for comparison. From left to right: PSFS Building, 1200 Market Street, 36 stories; 5 Penn Center, 1601 Market Street, 36 stories; Evo at Cira Centre South, 2930 Chestnut Street, 36 stories; 1706 Rittenhouse, 1706 Rittenhouse Square, 33 stories. *Images from Wikipedia.org.*

Essentially, this signals a substantial change in density and dynamic of the City, region and even Commonwealth. This proposal is a bellwether of the direction of development in the Lehigh Valley and is one of the most significant development proposals in the City and region's history. With this understood, this proposal is worthy of intense examination for its potential effect on Allentown and on the region. While this review was conducted per the county planning requirements of the Pennsylvania Municipalities Planning Code, the LVPC offers the City additional consultation and support as needed.

Sincerely,

Joseph Dotta
Regional Planner

Becky A. Bradley, AICP
Executive Director

p.s. 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.

cc: Umran Global Investment LLC, Applicant; Michael A. Houston PLS (AASA), Project Engineer/Surveyor; Steve Bamford, Executive Director, Allentown Neighborhood Improvement Zone Development Authority; Priscilla Reyes, City of Allentown Assistant Planner; Jesse Sadiua, City of Allentown Chief Planner; Brandon Jones, City of Allentown Planner



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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

June 7, 2024

Jill Garcia, Manager
Wilson Borough
2040 Hay Terrace
Easton, PA 18042

Carl Manges, Planning Administrator
City of Easton
123 South Third Street
Easton, PA 18042

Kent Baird, Planning Director
Palmer Township
3 Weller Place
Palmer, PA 18045

**RE: Easton Commerce Park – Land Use of Regional Significance
Wilson Borough, City of Easton and Palmer Township
Northampton County**

Dear Ms. Garcia, Mr. Manges and Mr. Baird:

The application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Warehouse, Logistics and Storage Facilities, Freight Facility Local Freight Generator category. The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

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The application proposes to construct a 1,006,880-square-foot warehouse at 1525 Wood Avenue (parcel numbers L9 14 4 0310, L9 14 4 0324, L9 14 4 0837, L9 23 1 0310, L9 23 1 0837, L9 22 1 0837, L9 15 1 0310, L9 6 1 0310, L9 6 1 0837, L9 6 1B 0310, L9NW3C 1 1 0837 and L9NW3D 1 2 0837). The majority of the proposed building is located in Wilson Borough with a portion extending into the City of Easton. The northwestern portion of the property is in Palmer Township, but has no proposed development. The 106.2-acre site formerly contained industrial development to the southeast where buildings have been removed, and the western and northern portions of the property are undeveloped, containing woodlands and steep slopes.

Site Suitability

The project is located in the Development Area of the *FutureLV: The Regional Plan* General Land Use Plan. The site formerly contained a pigment plant operation, a heavy industrial use that has been vacant and underutilized for several years. Municipal zoning designations for the site reflect the intent of the Borough, City and Township to facilitate redevelopment in this location:

| Municipality | Zoning Designation | Is The Use Permitted? |
|-----------------|------------------------------------|--------------------------------|
| Wilson Borough | General Industrial (I-1) | Yes (G-13 Warehouse) |
| City of Easton | Adaptive Reuse (AR) | Yes (F8 Warehouse and storage) |
| Palmer Township | Light Industrial/Mixed Use (LI/MU) | Not permitted |

Warehousing is a permitted-by-right use in the zoning designations for the site within Wilson Borough and the City of Easton. Warehousing is not a permitted use in Palmer Township's jurisdiction; the Light Industrial/Mixed Use district is intended for business and commercial-oriented uses rather than industrial.

The site is served by public sewer and water utilities, and reinvestment in commercial areas promotes the fiscal health and sustainability of municipalities. Redevelopment of the site provides economic benefits to the community, including jobs accessible to residents and tax revenue for the municipalities and school districts (of Policies 4.6 and 5.4).

Redevelopment of the site has the potential to align with *FutureLV: The Regional Plan* if scaled appropriately, and by taking steps to mitigate environmental and transportation impacts. However, the size of the proposed building, at more than 1 million square feet, greatly surpasses the scale of surrounding developments. The proposal has been designed to maximize building size, disregarding site topography and existing natural resources, including steep slopes and woodlands that are critical to supporting wildlife habitats adjacent to the Bushkill Creek. Opportunities are present to reduce the building square footage or provide multiple smaller buildings, such as for commercial-flex spaces, which would also eliminate conflicts with the Palmer Township zoning designation.

Additionally, roadways in the vicinity were not built to withstand the impacts of such a high volume of tractor-trailers and are currently inadequate to accommodate the proposal. Nearby developments and existing land uses, including Hackett Park and Palmer Township residential neighborhoods to the northwest and the Simon Silk Mill mixed-use redevelopment in the City of Easton to the east, face quality of life impacts depending on how traffic is routed to and from the site.

As proposed, the development does not align with *FutureLV: The Regional Plan* because it does not 'match development intensity with sustainable transportation infrastructure capacity' (of Policy 1.1). If the project moves forward as proposed, development impacts should be mitigated to protect the public health, safety and welfare, and to ensure the lowest impact and most sustainable site design in the fiscal interests of the developer, Borough, City and Township.

Natural Features

The project site contains a variety of natural features, including woodlands, hydrographic features, steep slopes of 15%-25% and is identified as a Natural Heritage Inventor Supporting

Landscape according to the Pennsylvania Natural Heritage Program. The northernmost portion of the site is identified as a Local Natural Area, Binney & Smith Woods. Avoiding steep slope and woodland areas by utilizing smaller building footprints and increasing the buffer distances between development and natural resources would 'maximize preservation of woodlands, critical habitats and natural resources in the land development process' (of Policy 3.1).

Floodplain and Tributary

A portion of the site to the southeast is located in a floodplain area identified by the Federal Emergency Management Agency (FEMA) as 1% Annual Chance Flood Hazard. Development in the floodplain and relocation of the Bushkill Creek tributary as indicated on the plans will be subject to FEMA and Pennsylvania Department of Environmental Protection review and permit approval.

Landscaping

No landscaping features are depicted on any of the landscape plan sheets. These sheets only include planting lists, but no design has been provided. Providing sufficient landscaping is crucial to mitigating stormwater impacts generated by impervious surfaces, offsetting air quality impacts generated by motor vehicles especially freight vehicle idling, reducing disturbance to nearby wildlife habitats, and improving the health and wellness of employees and visitors. Appropriate landscaping should also be provided within detention basins, with paths to access them, to further improve access to green spaces (of Policies 3.1, 3.2, 3.4 and 5.3).

Lighting

Upward lighting should be avoided to protect disturbing wildlife and migratory patterns. The LVPC recommends ensuring that lighting fixtures are designed to minimize glare and are targeted in a manner that supports, 'maximizing the preservation of critical habitats' (Policy 3.1).

Sustainable Energy

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'minimize environmental impacts of development' (Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing. Incorporating sustainable practices help to 'reduce climate change impacts' (Policy 3.4).

The significant footprint and design of the proposed structure lends itself to more innovative approaches to minimize stormwater runoff and higher energy efficiency. Based on current plans, stormwater is to be captured in a series of large managed release concept (MRC) basins (designed to capture discharge and slowly release but prevent infiltration). As proposed, the location of the basins will require that a segment of the unnamed tributary to Bushkill Creek be relocated. We encourage the developers to evaluate utilizing green and blue roof technologies to take advantage of multiple potential environmental and building efficiency benefits. These include managing stormwater runoff volume and rate, reducing building energy costs by regulating building temperature in both summer and winter, reducing heat island effect by providing evaporative cooling, and extending service life of roofing materials.

Traffic Impact Study Discrepancies

The LVPC reviewed the submitted Transportation Impact Study (TIS) prepared by KCI Technologies Inc. dated December 2023. The LVPC noted substantial discrepancies between the TIS and land development plans regarding what is proposed – the submitted plan set

reflects a 1,006,880-square-foot warehouse while the TIS reflects a 221,256-square-foot high cube sort fulfillment center.

A transmittal letter dated May 1, 2024 submitted with the TIS states that the TIS will be revised and resubmitted concurrently to PennDOT and the municipalities for review. At the time of resubmission, the revised TIS should be provided to LVPC for review and comment as well. The Lehigh Valley Planning Commission as the bi-county planning organization for Lehigh and Northampton counties has responsibilities designated by the Pennsylvania Municipalities Planning Code (MPC) to provide guidance to the region on the potential impacts of proposed subdivision and land development projects. Inaccurate Transportation Impact Studies or planning process documents preclude accurate analyses and review of the proposal to determine impacts. The TIS must be updated to match the submitted plan set so that a complete and thorough review of anticipated transportation impacts on the community and region can be done with quality data and planning. Without current and correct information within land development applications, the LVPC cannot properly review the proposal from a county planning perspective.

An example of the changes in average anticipated trip generation between different land uses are calculated using the Institute of Transportation Engineers (ITE) Trip generation Manual, 11th edition are below. The LVPC used ITE Land Use Codes 155 (High Cube Fulfillment Center) and 150 (Warehousing) for a cursory analysis to illustrate the difficulties in transportation planning reviews when the transportation impact study does not match the plan set submitted. The calculations illustrate the wide ranges of transportation impacts that could be generated from changes of the building based on square footage and the characteristics of the operations of the facility:

| Land Use | Square footage | Passenger Vehicles | Commercial Trucks | Total Trips |
|--|----------------|--------------------|-------------------|-------------|
| Submitted TIS: High-Cube Fulfillment Center (Sort) Warehouse | 221,256 | 1,383 | 42 | 1,425 |
| Submitted Plan: High-Cube Fulfillment Center Warehouse | 1,006,880 | 6,484 | 191 | 6,293 |
| Submitted Plan: Warehouse | 1,006,880 | 1,118 | 604 | 1,726 |

Due to the discrepancies between the TIS and development plans as described above, the submitted TIS does not align with *FutureLV: The Regional Plan*.

Essential Freight Accommodations

The submitted plan set does not depict adequate parking for tractor-trailers. The shown parking spaces for trailers appear to be approximately 62 feet in length, however the longest legal tractor-trailers permitted on Pennsylvania roadways without a permit is 70’ with a tractor connected to the trailer. It is essential that freight-centric facilities provide truck parking on site to minimize truck parking and queueing on local streets (of Policy 2.4). Parking spaces should also be made available for tractor-trailer drivers to park overnight long-term to comply with federal laws regulating the hours of operation for commercial driver license holders (of *FutureLV* Policy 2.4).

Parking lots should be constructed with infrastructure to support electric vehicle charging on site. Electric vehicles are commonplace and most large vehicle manufacturers will eliminate

fossil fuel vehicles in the next decade or so. The air quality improvements as a result of decarbonization efforts from the private and public sectors, such as deployment of electric vehicles, are essential to improving air quality in the Lehigh Valley. Convenient charging stations may facilitate more employees who may travel long distances to utilize electric vehicles. In addition, heavy vehicles and equipment are increasingly electric and alternative fueled which further supports addition of charging infrastructure.

As part of providing freight-supportive infrastructure to minimize freight impacts on residents, it is recommended that the project incorporate snow removal equipment onsite for the removal of snow and ice from the tops of trucks and trailers as required by Pennsylvania State Law. Truck drivers are required to remove snow and ice hazards but need the appropriate equipment in which to remove the hazard in a safe and efficient manner. Snow removal equipment is becoming more commonplace at freight-centric facilities. Having this equipment helps ensure a safe transportation network free of snow and ice that may slide off the tops of trucks and trailers and cause disruptions on the roadway and to other vehicles and multimodal users (of *FutureLV* Policy 1.4).

Freight-centric facilities are reliant on tractor-trailers and commercial vehicles to operate and should play a part in accommodating the needs of the vehicles and drivers. Inclusion of a driver lounge with restrooms is strongly recommended to give drivers an area to plan their day, route themselves to their next destination and eat. A driver lounge can be an area to also communicate area transportation issues such as construction or available fuel locations and repair or maintenance services for their vehicles (of *FutureLV* Policy 2.4).

Traffic Circulation and Emergency Access

Proposed site access is provided by full access driveways on Wood Avenue and Hackett Avenue, both of which are state roads designated by the Pennsylvania Department of Transportation (PennDOT) as Route 2017. An internal driveway splits off from the Wood Avenue access driveway, leading to the passenger vehicle parking area on the southwestern side of the building.

The LVPC recommends ensuring that emergency services departments are involved in the site design and planning process to ensure responders are aware of site circulation to enhance response times and enable them to have the necessary equipment and training to serve a building of such large scale. Developments on steep slopes or sites with substantial grading can also be difficult to service in the event of a fire. Coordinating with emergency services departments is a best practice to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policies 2.2 and 5.1).

Limited Local Infrastructure

The road geometry where Hackett Avenue intersects Wood Avenue at a curve, forming a Y intersection, creates a difficult intersection for traffic to navigate, and potential traffic conflicts will be exacerbated by a significant increase in vehicles once the development opens. The LVPC encourages the applicant to work with PennDOT in developing roadway solutions that improve the flow of traffic, such as including a roundabout, to optimize roadway capacity and efficient movement of people and goods (of Policies 2.1 and 2.2).



Google Maps Aerial Imagery

Hackett Avenue along the frontage of the property has a bridge that was constructed in 1912 and is identified as “fair” condition by PennDOT Bridge Key 28730. This bridge will be significantly impacted by the proposed development, creating a situation that is unsustainable. It is of note that the bridge also has a significant elevation change. An immediate plan to replace this bridge is critical for the operation of the industrial site and to keep the transportation network in a state of good repair (of Policies 2.2 and 4.6).

It is recommended that the developer coordinate with the Borough, City, Township and PennDOT to create a truck route from the proposed development to Route 22. Drivers should be provided with a clear direction of travel that can accommodate their commercial vehicles to mitigate impacts to the surrounding community. Assessing and planning for impacts to Route 22 and identifying truck routes from the project to destinations in all directions are an essential part of proper transportation planning. The existing geometry and design of Route 22 interchange at Wood Avenue is a concern. It should be verified that tractor-trailers of up to 70 feet in length can safely and efficiently navigate the interchange without impacting existing traffic conditions. It is also recommended that freight impacts to the 25th Street intersection at Route 22 west of the project be studied to confirm the long-term sustainability of the project and the impacts to all three municipalities.

It is paramount that truck routing is specifically provided in the westbound direction on Hackett Avenue to prevent freight impacts to Hackett Park and the residential neighborhoods in Palmer Township to the northwest. If truck drivers need to travel to the north, GPS routing may utilize Tatamy Road to access Route 33. The LVPC recommends the proposed access drive on Hackett Avenue be restricted to left turn only for tractor-trailers to eliminate the possibility that trucks will be routed through local neighborhoods to minimize freight impacts (of Policy 2.4).

Similarly, truck routing to the east along Wood Avenue to North 13th Street should be eliminated to prevent freight impacts to the Simon Silk Mill mixed-use development in the City of Easton. Thoughtful anticipation of freight movements during the planning process with a comprehensive truck routing plan is paramount to identifying infrastructure needs and preventing adverse impacts to the surrounding communities.

Multimodal Transportation

Ensuring the workforce is able to use a variety of transportation modes to access the site is imperative to the long-term success and marketability of the proposal. The LVPC commends the

proposed walking trail along the eastern and northern perimeter of the site, which provides a connection to the Karl Sterner Arts Trail in the City of Easton. However, no connections are proposed between the proposed trail and proposed building. The LVPC recommends evaluating opportunities to connect the proposed trail to the building to ensure employees are able to utilize the trail for commuting.

Additionally, the LVPC strongly recommends facilitating connections to the Wilson Bike Path, an existing Regional Trail with connections north to Tatamy Borough and beyond and west to the City of Bethlehem and beyond. Providing connections to the Wilson Bike Path would close a gap in the trail network (of Policy 2.1).



Access to the Wilson Bike Path can be facilitated by constructing sidewalks along the Wood Avenue and Hackett Avenue property frontage. Sidewalks should also be constructed along both access driveways connecting to the proposed building. This infrastructure is critical to the health and wellbeing of employees and visitors to the warehouse who may wish to utilize sidewalks instead of walking or rolling in the roadway intended for motorized vehicles (of Policy 5.1).



A “Pedestrian Crossing” sign is currently located near the intersection of Wood Street and Hackett Avenue, indicating an existing demand for pedestrian infrastructure in the area.

Bicycle racks should be located at convenient locations near employee entrances to accommodate bicycle commuters as a low-cost low-impact form of transportation (of *FutureLV* Policy 5.2).

Lehigh and Northampton Transportation Authority (LANTA)

The Lehigh and Northampton Transportation Authority (LANTA) does not provide transit service in the project vicinity. The closest nearby transit service is located at the intersection of Northampton Street and 13th Street, approximately .40 miles south of the existing parking lot and start of the Karl Stirner Arts Trail, which is directly east of the project site. LANTA is aware of the proposed plans to extend the Karl Stirner Arts Trail across 13th Street to follow the Bushkill Creek, which runs along the perimeter of the project site’s complex.

The proposed plan does not include pedestrian connections and internal site circulation within the project site to connect pedestrians to the main entrances of the proposed 1 million square foot facility. While fixed route transit service directly to the project site is infeasible, LANTA sees great potential for this proposed project to connect to transit service on 13th Street if the plan includes pedestrian accessible connections from the proposed Karl Stirner Arts Trail extension to the main entrances of the proposed facility through a comprehensive pedestrian network within the project site. Given the proposed use of the project, LANTA anticipates ridership demand on 13th Street, however the pedestrian connectivity to the project site is necessary to consider proposed transit service on 13th Street in the future.

For follow up, please contact LANTA Planner/Land Use Specialist Molly Wood at mwood@lantabus-pa.gov.

Stormwater Review

The project site is located within the Bushkill 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.

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.

Representatives of adjacent municipalities have been copied on this letter to ‘coordinate land use decisions across municipal boundaries’ (of Policy 1.4). Please feel free to reach out with any questions.

Sincerely,



Jill Seitz
Chief Community and Regional Planner



Brian Hite
Transportation Planner



Susan Myerov
Director of Environmental Planning

cc: Easton Wood Ave PropCo, LLC, Applicant; Bogia Engineering, Project Engineer; Abruzzi Trust, Nevada Dynasty Trust, Record Property Owner; Monica Wall, Borough Engineer; Steven DeSalva, City Engineer; Justin Coyle, Township Engineer; Tina Smith, Northampton County Director of Community and Economic Development; Molly Wood, LANTA Planner/Land Use Specialist; Dion Campbell, Northampton County Conservation District Director



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

June 13, 2024

Ms. Lisa Pereira, Esquire, Township Solicitor
Broughal & DeVito, L.L.P
38 West Market Street
Bethlehem, PA 18018-5703

**RE: Employment Center/Mobile Home District Uses – Zoning Ordinance
Amendment
Forks Township
Northampton County**

Dear Ms. Pereira:

The Lehigh Valley Planning Commission (LVPC) will consider the application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

- LVPC Comprehensive Planning Committee Meeting
 - June 25, 2024, at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - June 27, 2024, at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to amend the Township Zoning Ordinance by removing Mini Warehouse as a permitted use in the Employment Center/Mobile Home Zoning District (EC-1). In the ordinance, “mini warehouse” is used to describe what is now commonly known as self-storage. The stated purpose of the EC-1 District is to promote and encourage employment opportunities and help support the residential growth in the community (Township Zoning Ordinance §200-12. G. and H.). The proposal aligns with the Township’s intent for the EC-1 District because self-storage uses tend to require more land area to develop while being limited in job opportunities and providing little engagement or services that directly support the community. Removing self-storage as permitted in the EC-1 District also aligns with the intent of *FutureLV: The Regional Plan* to encourage context-specific proposals that complement community needs (of Policy 5.4).

The LVPC notes that while the permitted uses in the Township Ordinance refer to “Mini Warehouse”, the Definitions section of the Ordinance refers to “Self-Storage

Development” (Section 200-7). The LVPC recommends revising the Ordinance for consistent terminology, or further specifying the intended differences between uses to improve the efficiency of development processes (of Policy 1.4).

Municipalities, when considering Ordinance Amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please feel free to reach out if you have any questions.

Sincerely,



Jillian Seitz
Chief Community and Regional Planner

CC: Donna Asure, Township Manager