



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

LEHIGH VALLEY PLANNING COMMISSION MEETING

Thursday, June 27, 2024, at 7:00 PM

Via Microsoft Teams

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 Floor

Chairman's Report

1. 2024 Innovation & Collaboration Award - from the Water Resources Association of the Delaware River Basin

Minutes

1. *ACTION ITEM*: Minutes and Review of Roll Call Actions of the May 23, 2024, Commission Meeting (JD)

Environment Committee:

1. *INFORMATION ITEM*: Lehigh County Authority Update from Liesel Gross
2. *ACTION ITEM*: Act 537 Review - Roseto Borough Sewer Authority Corrective Action Plan
3. *ACTION ITEM*: PA Public Utility Commission - Service Territory Addition for Ridings at Parkland Phase 2 - North Whitehall Township
4. *ACTION ITEM*: Agriculture Security Area 7-Year Review - Lower Milford Township
5. *ACTION ITEM*: Agriculture Security Area Interim Review - Upper Milford Township

Comprehensive Planning Committee:

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)
4. *ACTION ITEM*: Comprehensive Planning Committee Summary Sheet (SM)

Transportation Committee:

1. *ACTION ITEM*: Ruhr Street and Hill Street – Street Vacation Petition Review (BH)

2. *INFORMATION ITEM*: Transportation Committee Summary (KH)

Old Business:

1. *INFORMATION ITEMS*: Activity Reports:
 - a. Monthly Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report (JD)
 - b. Highway Traffic Monitoring (BH)
 - c. Employment and Wages Report (JD)

New Business:

1. *DISCUSSION/ACTION ITEM*: Keeping Meetings Virtual? Or Move to Hybrid or In-Person?

Executive Director's Report:

2. None.

Communications and Engagement:

1. *INFORMATION ITEM*: Morning Call Business Cycle Column (MA)
 - a. Published June 23: "Their community needs them – and they come running"
 - b. Next column: July 28
2. *INFORMATION ITEM*: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA)
 - a. Air Date: June 3 - "Green Transportation Project with Susan Myerov and Allison Harvey."
 - b. Next show – July 1
3. *INFORMATION ITEM*: Grants (MA)
 - a. Department of Community and Economic Development Multimodal Transportation Fund
 - Deadline: July 31
 - Grants: \$100,000 to \$3 million
 - More Info: dced.pa.gov/programs/multimodal-transportation-fund/
4. *INFORMATION ITEM*: Local Technical Assistance Program Virtual Classes (BH)
 - a. Trucks on local Roads, Issues and Solutions, July 9: 8 am to noon
 - b. Drones: Municipal Transportation Uses, July 23: 8 am to noon
 - Register at <https://gis.penndot.gov/LTAP/default.aspx> contact Hannah Milagio at hmilagio@lvpc.org

Next Lehigh Valley Planning Commission Meeting:

Thursday, July 25, 2024, at 7:00 pm

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 May 23, 2024, Meeting

The LVPC held a virtual public meeting on Thursday, May 23, 2024. The meeting was advertised in the Lehigh Valley Press on Wednesday, February 14th, 2024.

LVPC Chair Dr. Chris Amato chaired the meeting.

Mr. Joey Dotta took Roll Call.

Members in Attendance:

Lehigh County

Michael Drabenstott, Sunny Ghai, Philip Ginder, Steve Glickman, Jennifer Gomez, Kent Herman, John Inglis, Dennis Klusaritz, Richard Molchany, Christina Morgan, Owen O'Neil, Stephen Repasch and Kevin Schmidt

Northampton County

Christopher Amato, Andrew Elliott, Charles Elliott, John Gallagher, Judith Haldeman, Darlene Heller, John McGorry, Steve Melnick, Scott Minnich, Armando Moritz-Chapelliquen, Edward Nelson and Tina Smith

Members Absent:

Lehigh County

Phillips Armstrong, Ron Beitler, Percy Dougherty, Michael Drabenstott, Bob Elbich, Diane Kelly, Santo Napoli and Matthew Tuerk

Northampton County

Jessica Cope, Ken Kraft, Rachel Leon, Carl Manges, Lamont McClure, Salvatore Panto, Jr., J. William Reynolds, Grace Crampsie Smith and Jean Versteeg

Staff Present: Joey Dotta, Jill Seitz, Becky Bradley, Christian Martinez, Matt Assad and Brian Hite.

Public Present: Jeff Ward (WFMZ), Phil Gianficaro (Lehighvalleynews.com), Neil Griffin and Claudia Robinson

COURTESY OF THE FLOOR

None appearing.

CHAIR'S REPORT

Chair Amato recapped the General Assembly meeting on May 14, 2024, and notified the Commission and members of the public that the LVPC is seeking support for the Priority Action Climate Plan Implementation Grant.

MINUTES

Chair Amato stated that the minutes of the Thursday, April 25, 2024, LVPC meeting are attached, and Mr. Dotta presented the previously voted on agenda items. Chair Amato then asked for a motion to approve the minutes. Commissioner Repasch made a motion to approve the minutes and Commissioner Morgan seconded the motion.

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

COMPREHENSIVE PLANNING COMMITTEE

ACTION ITEM: Whitehall Township and City of Allentown – Land Use of Regional Significance – Riverside Drive Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant

Ms. Seitz presented a proposal for a new 2.3-mile local road and multi-use trail along the former railroad right-of-way between Furnace Street in the City of Allentown and Wood Street/Lehigh Avenue in Whitehall Township. The paved portion of the project extends motor vehicle access from Furnace Street to Wood Street, providing connections to Jordan Drive, Kimmet Avenue and the Route 22 interchange at Fullerton Avenue. The road will be two-way for most of its length and posted with a 25-mile-per-hour speed limit. A paved shared use path for walking and bicycling will be constructed parallel to Riverside Drive, with a landscape buffer and street trees. Where Riverside Drive terminates and connects to Wood Street at Route 22, the path continues using gravel material, extending north past Bridge Street/Race Street with a connection to Lehigh Avenue. The trail extension beyond Bridge Street provides an opportunity to connect to the Ironton Rail Trail at Water Street.

Ms. Seitz noted that the proposal aligns with *FutureLV: The Regional Plan* because it reuses vacant and underutilized properties to enhance multimodal connections, increases access to jobs, provides active recreation opportunities that improve public health, supports emergency management and safety operations, creating safe routes to schools, parks and community facilities, preserves historical and natural resources and re-establishes neighborhood access to the Lehigh River. The project is supported by several regional plans and initiatives, including the Lehigh County Livable Landscapes Plan and the *Walk/RollLV: Active Transportation Plan*, closes Pennsylvania's highest priority trail gap along the Delaware & Lehigh National Heritage Corridor, and fulfills the vision outlined in the Whitehall Township Comprehensive Plan and Allentown Vision 2030.

Chair Amato called for a motion to accept the staff comments. Commissioner Gallagher made the motion, and Commissioner Glickman seconded the motion. Chair Amato asked for any comments or questions.

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

ACTION ITEM: Wilson Borough – Land Use of Regional Significance – 1921 Dixie Avenue

Ms. Seitz presented a proposal for an adaptive reuse of the existing Dixie Cup building into 405 apartment units and a separate 3,373-square-foot commercial building at 315 South 24th Street. As a brownfield site, substantial testing and remediation is required to make the redevelopment suitable for residential use. The LVPC commends the applicant for undertaking the necessary steps to initiate the process and encourages the continuation of due diligence to minimize environmental impacts.

The site was previously the Dixie Cup Factory, and while it has been vacant for decades, the building holds considerable local cultural and historical value. The LVPC commends the retention of the existing building as it is adapted to a new use, which promotes development that complements the unique history, environment, culture and needs of the Valley. It is of note, that the property is likely eligible for listing on the National Register of Historic Places for association with persons and events significant in American history. It is recommended that the developer contact the Pennsylvania Historical and Museums Commission prior to any construction.

Ms. Seitz explained that the proposed redevelopment creates housing opportunities and is aligned with efforts supported by the LVPC to address the Lehigh Valley's substantial housing shortage. This development will increase residential density in an existing center and expand housing options near

employment areas. Ensuring housing is available at a variety of price points reduces the need for workers at local establishments to travel further for work, thereby reducing traffic congestion on roadways.

Mr. Hite reviewed the submitted Transportation Impact Study (TIS) for the project. The residential component of the project is anticipated to generate an average of 174 new trips during the morning peak hour period, and 165 trips during the evening peak hour period. The proposed restaurant is anticipated to generate an average of 354 trips over the course of the day.

The operation of parking area gates and access should be specified. Gated access can cause transportation network impediments when a vehicle is unable to gain access while others are queuing behind them. Gated access points should provide ample queuing areas with room for vehicles to reverse to ensure the continued mobility of the transportation network.

Mr. Hite noted that sidewalks are provided throughout the site, along parking areas and connect to the building and recreation areas to the external sidewalk network. The LVPC strongly recommends constructing sidewalks along the 25th Street property frontage. The shoulder of 25th Street shows a sustained history of foot traffic, and providing sidewalks would improve pedestrian safety.

Chair Amato called for a motion to accept the staff comments. Commissioner Moritz-Chapelliquen made the motion, and Commissioner Repasch seconded the motion. Chair Amato asked for any comments or questions.

Chair Amato commented that his grandfather worked in the Dixie Cup factory and that opportunity allowed him to buy a small home in Easton and raise a family. Chair Amato added that he believes the project aligns with *FutureLV: The Regional Plan*.

Commissioner Moritz-Chapelliquen commented that the language regarding recommending bicycle access on the northern side of the building could potentially be strengthened relating to *FutureLV: The Regional Plan*, Policies 5.1 and 5.2. Commissioner Moritz-Chapelliquen made a motion to amend the letter to add stronger language regarding another bicycle and pedestrian access point. Commissioner Melnick seconded the amended motion.

Neil Griffin commented that the development team is looking into adding a second access. He noted there is a fire lane and there may not be enough room, but the feasibility will be looked at. Ms. Bradley thanked Mr. Griffin for coming and urged him to contact the LVPC Transportation Team. Mr. Griffin responded that he will certainly reach out and recognizes the significance of the property to the local community.

Commissioner Nelson asked if there are discussions about adding lights to the trail due to its proximity to the school. Mr. Griffin responded that there has yet to be discussion but that it would be a welcome addition.

Commissioner Tina Smith thanked the development team for being responsible in the redevelopment of the site. It was mentioned all the preservation they are doing and new green energy initiatives the team is undertaking. Claudia Robinson added that the development team is preserving the Dixie Cup and making a replica for the top of the building.

Chair Amato called for affirmative votes to accept the staff comments with the amended motion. The motion passed.

ACTION ITEM: North Whitehall Township – Land Use of Regional Significance – Nexus 78

Mr. Dotta presented a proposal for a 547,500-square-foot warehouse at 3121 Route 309. A portion of the property not proposed for development is also located in South Whitehall Township. The 71.1-acre site is largely undeveloped, containing an existing residence, agricultural land and woodlands.

Mr. Dotta noted that the LVPC is an advisory body to North Whitehall Township and sees preliminary land development plans early in the review and approvals process to support refinement of plans prior to final action by the local government. The LVPC's review letter looks at various land use, transportation, environment and other aspects of the proposal as it relates to goals, policies and actions in *FutureLV: The Regional Plan* and other LVPC adopted plans and available data. In the case of this proposal, the land use is incompatible to neighboring land uses, lacks transportation and utility infrastructure, and topography concerns exist. Therefore, the development is generally inconsistent with the goals and policies outlined in *FutureLV: The Regional Plan*.

Mr. Dotta explained that the Township's adopted zoning code allows Light Industrial uses in this location, reflecting the communities' intent for development to occur in this location. The size of the proposed building, over 500,00 square feet and 50 feet high, greatly surpasses the scale of surrounding developments. Overall, the site is not served by adequate infrastructure to accommodate the proposal. Additionally, the proposal is located adjacent to incompatible land uses, including residential neighborhoods and educational facilities. The subject property is better suited for smaller-scale low-impact commercial and industrial land uses that support local businesses and residents and can provide a transition between residential and industrial developments.

Mr. Dotta mentioned a variety of natural features, including woodlands, hydrographic features with riparian buffers, and steep slopes. While these features are primarily located in the northern area of the property and the proposed building is situated towards the south to minimize disturbance, a more appropriate form of development would utilize smaller building footprints and increase the buffer between development and natural resources.

Mr. Hite presented that the project is estimated to generate an average of 903 total vehicle trips per day, 600 of which are passenger vehicles and 303 are trucks. The right-out configuration of the driveway on Orefield Road and the impacts to turning movements at Route 309 should be studied, as Orefield Road at Route 309 may not be able to accommodate queuing of vehicles turning southbound on Route 309 from Orefield Road.

Mr. Hite noted that turn movements from the full access driveway area are a concern, as there is an elevation change south of the access driveway, with a posted speed limit of 45. The developer should confirm with the municipality and PennDOT the adequacy of safe and efficient turn movements of freight tractor-trailers at this location and any improvements that could be implemented to improve turn movements for tractor-trailers and passenger vehicles.

Chair Amato called for a motion to accept the staff comments. Commissioner Melnick made the motion, and Commissioner Ghai seconded the motion. Chair Amato asked for any comments or questions.

Chair Amato complimented the letter and highlighted that the Commission's primary job is to determine if a project conforms to *FutureLV: The Regional Plan*. He noted that this project is not viable in the long-term.

Commissioner Melnick commented that the sharp increase in truck traffic poses an additional cost for North Whitehall Township and PennDOT to maintain the nearby roads. Commissioner Klusaritz commented that an industrial use is not a good fit for this area due to the Orefield Middle School being nearby. Commissioner Klusaritz noted that the parcel was rezoned about seven years ago and he voted no on it then.

Commissioner Repasch asked for clarification on why the traffic count numbers were so high for specifically passenger vehicles. Mr. Hite responded that various studies determined that those trips would represent the number of employees at a facility of this size. Commissioner Melnick questioned if there was an end user identified. Mr. Hite responded that there was no end user identified in the TIS.

Commissioner Ghai clarified that the distance between this warehouse and Route 22 is roughly three miles and the bulk of it is single lane. Commissioner Ghai noted existing congestion and that the project seems super-sized.

Commissioner Moritz-Chapelliquen thanked both the staff for the thorough letter and the public who came to the meeting to express their concerns.

Chair Amato called for affirmative votes to accept the staff comments. The motion passed. Commissioner Klusaritz abstained.

ACTION ITEM: Comprehensive Planning Committee Summary Sheet:

Comprehensive Planning Committee Chair Steve Melnick presented a summary of the Committee meeting that occurred on Tuesday. The meeting included one subdivision and land development ordinance in Whitehall Township.

Chair Amato called for a motion to accept the staff comments. Commissioner Morgan made the motion, and Commissioner Gallagher seconded the motion. Chair Amato asked for any comments or questions. There were none.

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

ENVIRONMENT COMMITTEE

ACTION ITEM: Environment Committee Summary Sheet:

Environment Committee Chair Steve Repasch presented a summary of the Committee meeting that occurred on Tuesday. The meeting included a proposed amendment to the 2020 Upper Saucon Township Comprehensive Recreation and Open Space Plan Update.

Chair Amato called for a motion to accept the staff comments. Commissioner Melnick made the motion, and Commissioner Ginder seconded the motion. Chair Amato asked for any comments or questions. There were none.

Chair Amato called for affirmative votes to accept the staff comments. The motion passed. Commissioner Inglis abstained.

TRANSPORTATION COMMITTEE

INFORMATION ITEM: Transportation Committee Summary

Transportation Committee Chair Kent Herman summarized the Committee meeting that occurred hours before including a recap of the first public meeting of the Draft 2025-2028 Transportation Improvement Program by the Lehigh Valley Transportation Study, the Transportation Alternatives Set-Aside (TASA) awards by PennDOT, and the quarterly PennDOT TASA and Multimodal Transportation Funded projects report and status reports on passenger rail.

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

OLD BUSINESS:

INFORMATION ITEMS: Activity Reports

Mr. Dotta presented the Monthly Subdivision Report that featured seven Subdivisions, 19 Development proposals, 12 Stormwater Management reviews, and nine Municipal Ordinances and Maps for a total of 47 reviews over 232 acres. 22 of those reviews were in Lehigh County and 25 were in Northampton County. Mr. Dotta added that the LVPC reviewed 700 total residential units, consisting of 79 single-family detached, 197 townhouses, 336 apartments, 22 twins and 66 manufactured homes. On the non-residential side, it was presented that the LVPC reviewed a total of 604,547 square-feet, which included

11,704 square-feet of commercial, 5,756 square-feet retail, over 19,132 square-feet public/quasi public, 266,000 square-feet of warehouse, 101,821 square-feet of office space and 199,944 SF of transportation.

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

Mr. Hite presented the Monthly Traffic Report, which featured a counter on Route 22 between Airport Road and the Fullerton Avenue Exit, which recorded 107,365 vehicles. Interstate 78, just east of Route 309, recorded 75,012 and Route 309 near Coopersburg logged 39,677 vehicles.

Next, Mr. Hite presented commercial truck traffic. Interstate 78 east of 309 recorded 22,215 trucks. Route 22, just east of the Lehigh River Bridge, recorded 11,403 trucks. Mr. Hite noted that both counters on Interstate 78 will be offline for a short time for repairs, but two other traffic counters will be back online soon.

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

Mr. Dotta presented the Quarterly Industrial Market Report which showed a slight slowdown in construction and development completions recently. The average asking lease rate increased from \$5.79 a square-foot per year in Lehigh County and \$7.98 a square-foot per year in Northampton in the first quarter of 2022 to over \$11 a square foot in the first quarter of 2024.

Chair Amato asked for any comments or questions. Commissioner Repasch commented that the industrial market is primarily warehouses nowadays rather than industry. Commissioner Ghai added that warehouses often include distribution and fulfillment centers.

NEW BUSINESS:

EXECUTIVE DIRECTOR'S REPORT:

INFORMATION ITEM: Quarterly Work Plan Update

Ms. Bradley presented an overview of work program projects that are currently underway. The Lehigh Valley Priority Climate Action Plan, the Lehigh Valley Watershed Assessment Global Act 167 Plans Update, the Transportation Improvement Project (TIP), and the Regional Housing Supply and Attainability Strategy were all summarized to the Commission members. Ms. Bradley added that later this year the LVPC will begin an update to the Transportation Safety and Mobility Plan and the LVPC is in the process of applying to be nationally recognized in the Vision Zero movement. There are several freight management initiatives underway at the LVPC like the Eastern Pennsylvania Freight Infrastructure Plan and the Lehigh County Freight Land Use Assessment.

COMMUNICATIONS AND PUBLIC ENGAGEMENT:

INFORMATION ITEM: Morning Call Business Cycle Column

Mr. Assad spoke about the most recent Morning Call column where Becky explains the Green Transportation Infrastructure Project and urges people to send support letters to the US Environmental Protection Agency. The LVPC has applied for a \$115 million grant to fund the project and community support helps tremendously. That column can be found at lvpc.org/news/v or at mcall.com.

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

INFORMATION ITEM: Plan Lehigh Valley radio show on WDIY NPR 88.1FM

Mr. Assad summarized the most recent Plan Lehigh Valley radio show that aired May 6, and took a close look at the Transportation Improvement Program, with guests PennDOT District Executive Chris Kufro and LVTS Coordinating Committee Chairman Rick Molchany. That show is streaming at lvpc.org/news/v and at WDIY.org.

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

INFORMATION ITEM: Local Technical Assistance Program Virtual Classes

Mr. Assad summarized the PA Municipal Planning Education Institute (PMPEI) being offered in PA land use and planning. In 2024, the three courses offered are Zoning Administration in May were sold out, and future classes include Subdivision and Land Development in September, and Community Planning in October. Mr. Assad urged prospective participants to sign up quickly as spots are being filled.

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

ADJOURNMENT:

Chair Amato stated that the next LVPC meeting is set to be on April 25 at 7pm. Chair Amato asked what the meeting setting would be for June. Chair Amato asked if the Commission could take a vote that night and Ms. Bradley asked Commissioner Herman the legality of voting. Commissioner Herman said that there should be full notice of action items. Ms. Bradley offered the idea of an email vote but said she would check with Gary Asteak. It was determined that Ms. Bradley would follow up with the Commissioners about the possibility of voting for a hybrid meeting.

Chair Amato then asked if there was a motion to adjourn the meeting and Commissioner Molchany made a motion to adjourn. The meeting was adjourned.

Submitted by:

Becky Bradley, AICP, Executive Director and Joey Dotta, Regional Planner

June XX, 2024

Ms. Mary Beth Peters, PE
Entech Engineering
201 Penn Street, P.O. Box 32
Reading, PA 19603-0032

Re: Act 537 Review – Roseto Borough Sewage Authority Corrective Action Plan – Roseto Borough, Northampton County

Dear Ms. Peters:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on June 27, 2024, reviewed the above-referenced application based on the adopted plans and policies of the LVPC. We offer the following comments.

The Roseto Borough Sewer Authority (RBSA) has prepared a draft Corrective Action Plan (CAP) to address hydraulic overload conditions within its collection systems identified by the Pennsylvania Department of Environmental Protection in its review of Bangor Borough Authority (BBA), Roseto Borough Sewer Authority (RBSA) and Washington Township's 2022 Municipal Wasteload Management Annual Report. The RBSA flows are metered at two locations within the RBSA/BBA sewershed boundaries. The meters are owned and operated by Bangor Borough Authority.

According to the RBSA CAP, a number of activities have been completed over the years to remove excess infiltration and inflow (I/I) into the system. Some of these efforts include inspection of the entire collection system, inspection and replacement of sewer mains and laterals, manhole repairs, long-term metering planning, and more replacements and repairs of gravity sewer mains to reduce sanitary sewer overflows. RBSA has also obtained grant funds in 2024 to further address I&I issues and is currently in the design and implementation stage of this effort. RBSA is proposing to have permanent flow meters within its collection system, specifically on the RBSA interconnections to serve as backups to the BBA meters. Installation of a third meter to monitor flow within a subbasin is also proposed in this plan. Other efforts to address the hydraulic overload conditions within the RBSA collection system are to conduct in-home inspections of sump pumps, roof drains or other cross-connections as well as smoke testing to evaluate any cross-connections within the collection system.

The provision of environmentally sound and efficient sewage disposal for existing and future development is a goal of *FutureLV: The Regional Plan*. Actions to remove or reduce excessive infiltration and inflow align with *FutureLV* Policy 3.2, 'to protect the quality and quantity of surface water and groundwater'. The upgrades the sewer system align with the *FutureLV* action to 'improve the utility and mobility infrastructure of the region' (under Policy 1.1). The LVPC recommends continued coordination among the partners to address these issues. Long-term monitoring as proposed in the CAP will help prevent future I/I problems.

Ms. Mary Beth Peters, PE
Entech Engineering
June XX, 2024
Page 2

Please feel free to reach out if you have any questions.

Sincerely,

Corinne Ruggiero
Environmental Planner

cc: Cathy Martino, Manager, Roseto Borough
Stephen Reider, Manager, Bangor Borough
Robert Smith, Chair, Washington Township
Amy Bellanca, PE, PA Department of Environmental Protection



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June XX, 2024

Mr. Kenneth R. Stark
McNees Wallace & Nurick LLC
100 Pine Street, P.O. Box 1166
Harrisburg, Pennsylvania 17108-1166

**Re: PUC Review – Application for Approval of a Wastewater Service Territory Addition to the
The Ridings at Parkland Phase 1 and 2 Subdivision
North Whitehall Township, Lehigh County**

Dear Mr. Stark:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on June 27, 2024, reviewed the above-referenced application based on the adopted plans and policies of the LVPC. We offer the following comments.

The purpose of the application is for approval of Allied Utility Services to expand its service territory and provide wastewater treatment service to the proposed Ridings at Parkland Phase 2 residential subdivision as well as additional properties from the existing adjacent residential subdivision, Ridings at Parkland Phase 1 within North Whitehall Township adjacent to its existing PUC service territory. The proposed subdivision consists of 38 lots on 25.94 acres and then six lots within Phase 1 of the residential subdivision. The existing Township Act 537 Sewage Facilities Plan revision was approved by the PA Department of Environmental Protection on January 26, 2021, officially recognizing that the Applicant can serve additional sewage flows up to 120,000 gallons per day of the design and permitted capacity of the existing treatment plant. Therefore, additional capacity is available at the plant to handle the flows from the proposed development of Phase 2 as well as flows generated from the six Phase 1 lots.

The proposed development is in a designated Farmland Preservation/Preservation Buffer area according to *FutureLV: The Regional Plan*. In Preservation Buffer areas, factors may be present and capable of accommodating additional development, including available public sewer system capacity. While public sewage disposal is not available to the site presently, the use of existing excess capacity at the central sewage treatment plant would be suitable for accommodating the proposed development to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).

Please call me if you have any questions regarding these comments.

Sincerely,

Corinne Ruggiero
Environmental Planner

cc: Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission
Jeffrey Mouer, Director of Planning & Zoning, North Whitehall Township



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Executive Director

June xx, 2024

Emily Fucci, Township Administrator/Zoning Officer/Planning Administrator
Lower Milford Township
7607 Chestnut Hill Church Road
Coopersburg, Pa 18036-3712

RE: Agricultural Security Area Seven -Year Review

Dear Ms. Fucci,

Thank you for notification regarding Lower Milford Township's initiation of the seven-year review of its Agricultural Security Areas (ASA) properties to determine whether certain properties currently listed in the ASA still qualify for inclusion. The Lehigh Valley Planning Commission (LVPC) considered the subject interim review at its Environmental Planning Committee and Full Commission meetings, pursuant to the requirements of Pennsylvania's Agriculture Security Area Law (Subchapter E. Section 1381.51).

Lower Milford Township staff has identified 17 properties to be reviewed based upon its belief that such properties have been changed to residential or nonagricultural commercial uses. A detailed spreadsheet of properties currently enrolled in the ASA was provided, along with a list of the 17 properties being recommended for removal. These parcels are residential lots with the Maplewood Subdivision as shown in the aerial image attached. Prior to the subdivision, the land was a farm.

The LVPC offers the following comments and recommendations:

LVPC staff conducted a GIS-based analysis of the properties utilizing 2023 aerial imagery and agricultural property data information. This information was overlaid using the ASA property boundary data provided by the Township and compared with LVPC data. Based on this review it is our recommendation that the Township staff's analysis is accurate and that these properties should no longer qualify for ASA inclusion.

Please feel free to reach out with any questions.

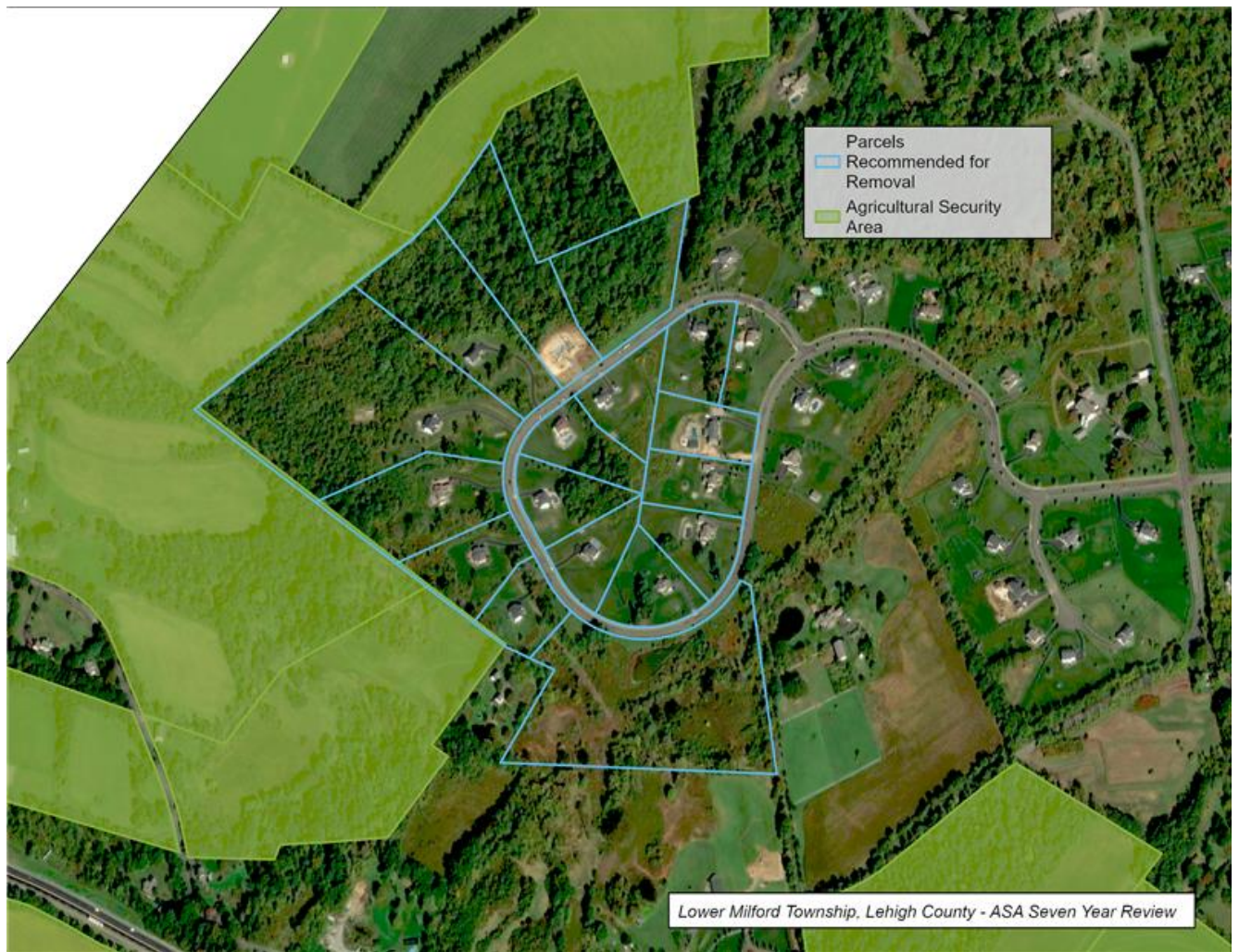
Sincerely,

Susan Myerov, AICP
Director of Environmental Planning

Christian Martinez
Environmental Planner

Mackenzie Geisner
GIS Planner

Attachments



Location of Parcels Recommended for ASA Removal - Lower Milford Township



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Executive Director

June 12, 2024

Brian Miller, Planning Coordinator/SEO
Upper Milford Township
5671 Chestnut St.
P.O. Box 210
Old Zionsville, Pa. 18068

RE: Agricultural Security Area Interim Review

Dear Mr. Miller

Thank you for notification regarding Upper Milford Township's interim review of its Agricultural Security Areas (ASA) properties to determine whether certain properties currently listed in the ASA still qualify for inclusion. The Lehigh Valley Planning Commission (LVPC) will consider the subject interim review at its Environmental Planning Committee and Full Commission meetings, pursuant to the requirements of Pennsylvania's Agriculture Security Area law (Subchapter E. Section 1381.51). Discussion on agenda items primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

- LVPC Environment Committee Meeting
June 25, 2024, at 10:30 AM
<http://www.tinyurl.com/LVPC2024>
- LVPC Full Commission Meeting
June 27, 2024, at 7:00 PM
<http://www.tinyurl.com/LVPC2024>

Upper Milford Township staff has identified 157 properties to be reviewed based upon its belief that such properties have been changed to residential or nonagricultural commercial uses. A detailed spreadsheet and mapping of ASA properties currently enrolled in the ASA were provided to LVPC to assist in its review.

The LVPC offers the following comments and recommendations:

LVPC staff conducted a GIS-based analysis of the properties utilizing 2023 aerial imagery and agricultural property data information. This information was overlaid using the ASA property boundary data provided by the Township and compared with LVPC data. Based on this review it is our recommendation that the Township staff's analysis is accurate and that these properties should no longer qualify for ASA inclusion.

Please feel free to reach out with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan Myerov", with a long horizontal flourish extending to the right.

Susan Myerov, AICP
Director of Environmental Planning

A handwritten signature in blue ink, appearing to read "Mackenzie Geisner", with a stylized, cursive script.

Mackenzie Geisner
GIS Planner

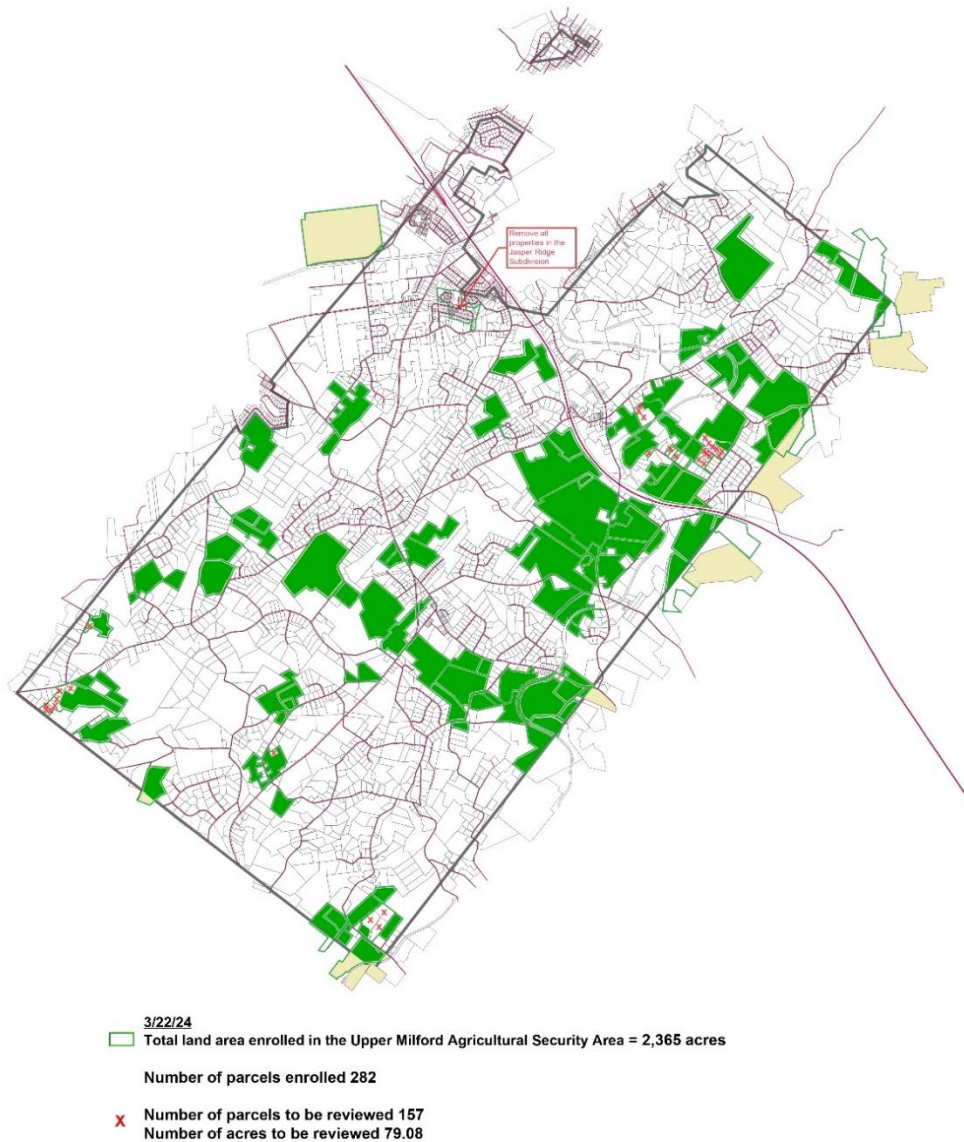
A handwritten signature in blue ink, appearing to read "Christian Martinez", with a stylized, cursive script.

Christian Martinez
Environmental Planner

Attachments

Upper Milford Township Agricultural Security Act Properties

March 2024 Review Map



Map of ASA parcels in Upper Milford with Recommended Changes – Source: Upper Milford Twp.



LVPC Parcel Review Example – 1 – Jasper Ridge Development (LVPC image)



LVPC Parcel Review Example – 2 (LVPC Image)



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Chair

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ARMANDO MORITZ-CHAPELLIQUEN
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BECKY A. BRADLEY, AICP
Executive Director

June 07, 2024

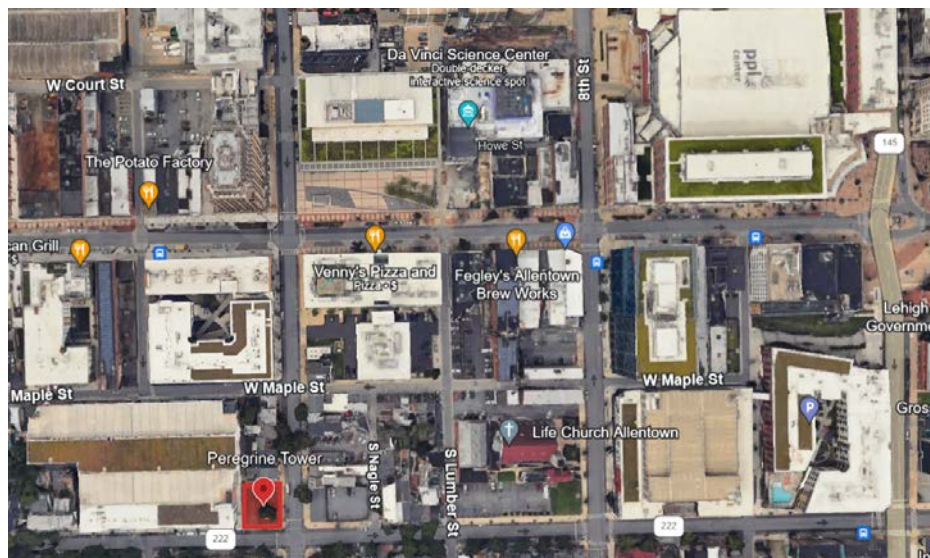
Ms. Jennifer Gomez, Director of Planning and Zoning
City of Allentown
435 Hamilton St.
Allentown, PA 18101

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

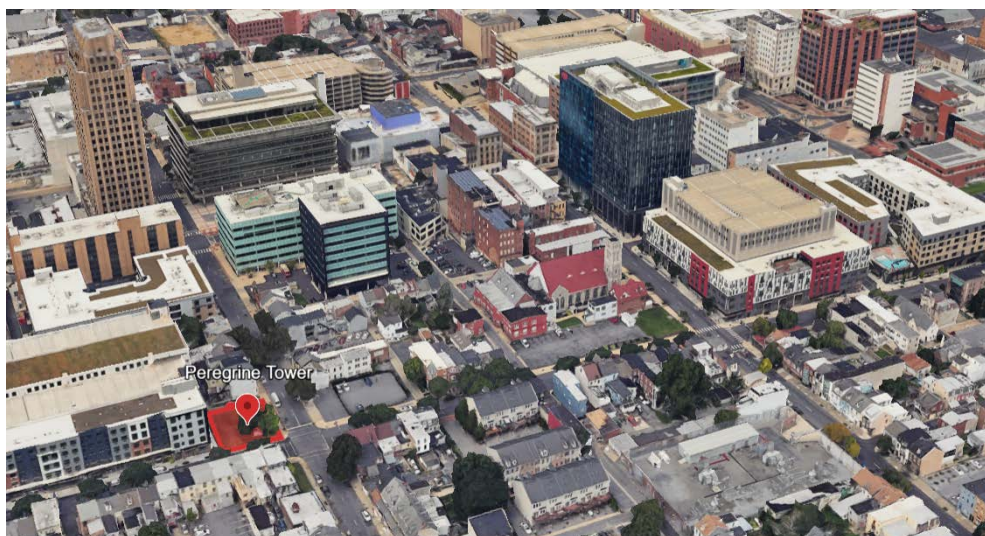
Dear Ms. Gomez:

The subject application proposes constructing a 37-story building with 206 residential units, 2,651 square-feet of retail and 9,953 square-feet 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:

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

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), it's 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.

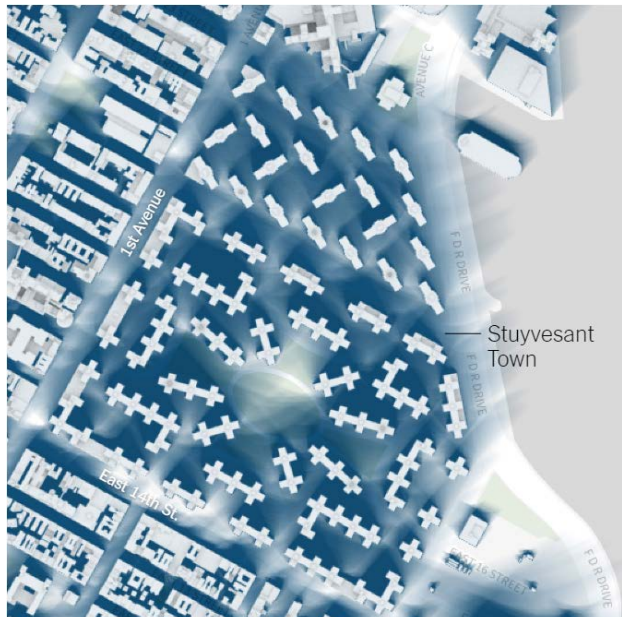
New York Times reporters Quoctrung Bui and Jeremy White have noted:

“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 curb-cut 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 I§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



DR. CHRISTOPHER R. AMATO
Chair

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Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

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:

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

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



Project Review Summary Sheet

Comprehensive Planning Committee

Date: June 2024

Project	Municipality	Brief Statement of Purpose	LVPC Comment
Zoning Ordinance Amendment	Forks Township	<i>Employment Center/Mobile Home District Uses</i> – Removes Mini Warehouse as a permitted use in the Employment Center/Mobile Home Zoning District (EC-1).	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 <i>FutureLV: The Regional Plan</i> to encourage context-specific proposals that complement community needs (of Policy 5.4).



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

June 10, 2024

Michael P. Hanlon
435 West Hamilton Street
Allentown PA 18101
Michael.Hanlon@AllentownPA.gov

RE: **Street Vacation Petition**
o **Hill Street from South Saint Lucas to South Ruhr Street**
o **South Ruhr Street from Willow Street to Hill Street**
City of Allentown, Lehigh County

The Lehigh Valley Planning Commission (LVPC) will consider the subject street vacation petition at its Transportation Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Both meetings are virtual, please see the meeting details below to attend. The LVPC will issue a follow-up letter after the Commission meeting should the Commission have any additional comments or revisions.

- LVPC Transportation Planning Committee Meeting
 - o June 27, 2024 at 5:30 PM
 - o <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - o June 27, 2024 at 7:00 PM
 - o <https://lvpc.org/meetings.htm>

Mr. Hanlon,

The proposed street vacation petition was reviewed for recommendations under Section 304 of the Pennsylvania Municipalities Planning Code, and for general consistency with the intent of *FutureLV: The Regional Plan*.

The proposed street vacation application was submitted by the City of Allentown on behalf of Jose A. Cartagena, Sr. of 222 South Saint Lucas Street. The proposed street vacation requests vacating Hill Street from South Saint Lucas Street to South Ruhr Street and the vacating of South Ruhr Street from Willow Street to Hill Street. It should be noted that Elizabeth Riveria is listed as a co-signer of the petition and is the sole listed property owner of 222 South Saint Lucas Street.

Hill Street and South Ruhr Street at the location petitioned to be vacated are undeveloped, unimproved plotted streets. The area is currently maintained by property owners and is essentially landscaping and unimproved rights of way. The petitioner wishes to have control over the area of rights of way that have been maintained and kept up for property maintenance.

The petition indicates that the areas petitioned to be vacated have been in the current state for over 30 years.

The street vacation petition was co-signed by Rodney Reiss of 2127 West Fairview Street, Daniel Tulloch of 2151 West Fairview Street. Karen Esbensen of 214 South Saint Lucas Street, and Jay Esty of 215 South 22nd Street and It is recommended that the petitioner also acquire concurrence signatory from the owners of 2143 and 2135 West Fairview Street, as those parcels will have a portion of property responsibility of the vacated area if the petition is granted. Concurrence of all property owners brings awareness of property and maintenance responsibilities of the area petitioned to be vacated if granted. (*FutureLV: The Regional Plan, Policy 2.2*)

It is recommended utilities that are above or below ground remain accessible as they are today in the event of maintenance or repair that may be required to maintain the essential power and telecommunications utilities as well as any City of Allentown or Lehigh County utilities and infrastructure required to sustain the public health, safety and welfare of the community. It is also recommended that any emergency access to utilities and to access properties be maintained to ensure proper response by emergency services personnel (*FutureLV: The Regional Plan, Policy 5.4*)

If the petition is granted the city should consider the sidewalk mobility gap along South Saint Lucas Street at the frontage to the portion of Hill Street to be vacated. Sidewalk infrastructure with accommodations in compliance with the Americans with Disabilities Act (ADA) to ensure accessibility for all people and to promote alternative modes of transportation options is recommended to provide alternative modes of transportation and for continuity and connectivity for the community especially in a primarily walking Allentown School District. (*FutureLV: The Regional Plan, Policy 2.3*)

The vacating of rights of way by the City of Allentown for the described Hill Street from South Saint Lucas Street to South Ruhr Street and South Ruhr Street from Willow Street to Hill Street would not negatively affect current traffic circulation as the area general transportation network is intended to remain the same as it currently exists.

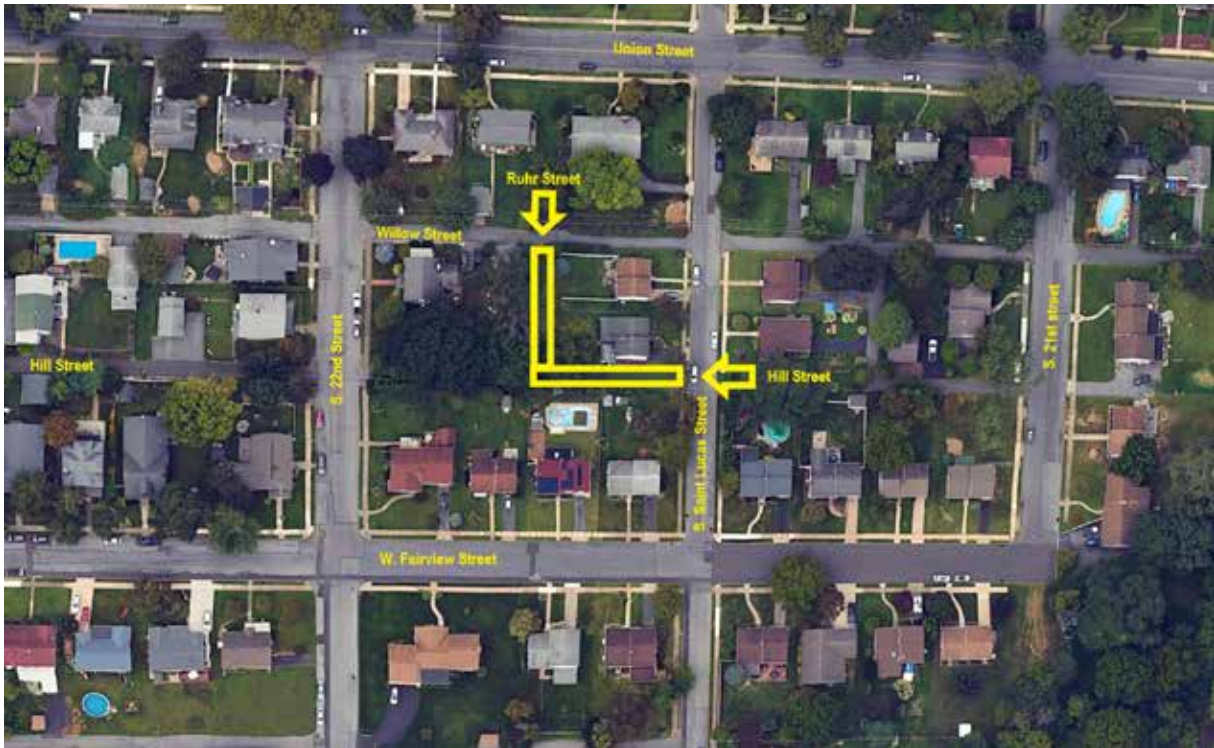
The LVPC appreciates the City of Allentown's consideration of the goals and policies of *FutureLV: The Regional Plan* in as much as it relates to the street vacation petitions for Hill Street from South Saint Lucas Street to South Ruhr Street and South Ruhr Street from Willow Street to Hill Street

Please feel free to reach out to me with any questions or concerns you may have regarding the LVPC review.



Brian Hite
Transportation Planner

Attachments



Courtesy Google Earth,
Yellow boxes are the areas petitioned to be vacated of rights-of-way



County of Lehigh County PA, data.pa.gov, New Jersey Office of GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc. METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS | Lehigh County GIS, Lehigh County IT
Blue box are the areas petitioned to be vacated of rights-of-way



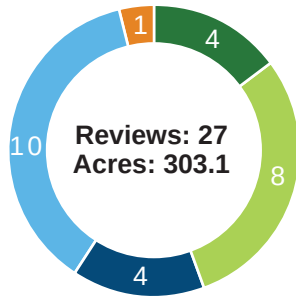
View of Hill Street looking west from South Saint Lucas Street
Area in Yellow is petitioned to be vacated.



View of Ruhr Street looking North from area of Hill Street
Area in Yellow is petitioned to be vacated.

Plan Activity

Lehigh County



Residential

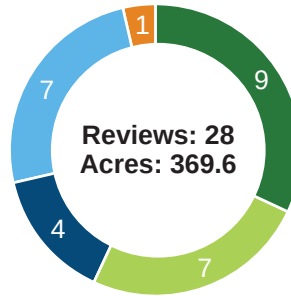
Non-Residential

Subdivisions and Lot Line Adjustments

Stormwater Management

Municipal Ordinances, Maps and Plans

Northampton County



Regional Totals*

8

Subdivision/Lot Line
Adjustments

28

Development

17

Stormwater Management

2

Municipal Ordinances,
Maps and Plans672.7
Acres

*Includes preliminary and final plans

Types of New Development

Residential: 733 Total Units

Single-Family
Detached
221Townhouses
23Apartments
475Planned
Residential
0Twins
14Assisted-
Living
0Manufactured
Homes
0Condos
0

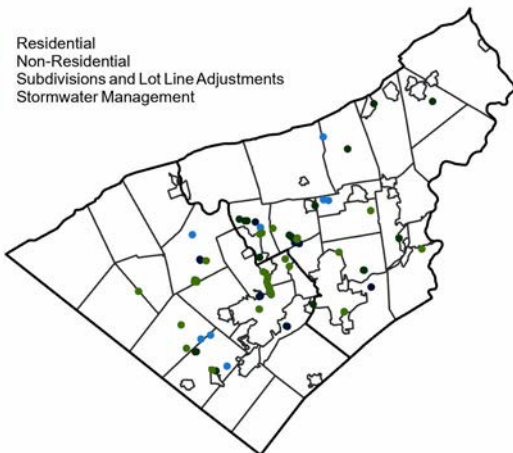
Non-Residential: 3,665,254 Total Square Feet

Commercial
197,589Retail
9,945Public/
Quasi-Public
151,391Industrial
(Warehouse)*
I: 3,199,995
(W: 3,199,995)Office
106,334Transportation
0Agriculture
0Recreational
0

* Warehouse number is a subset of industrial total square footage.

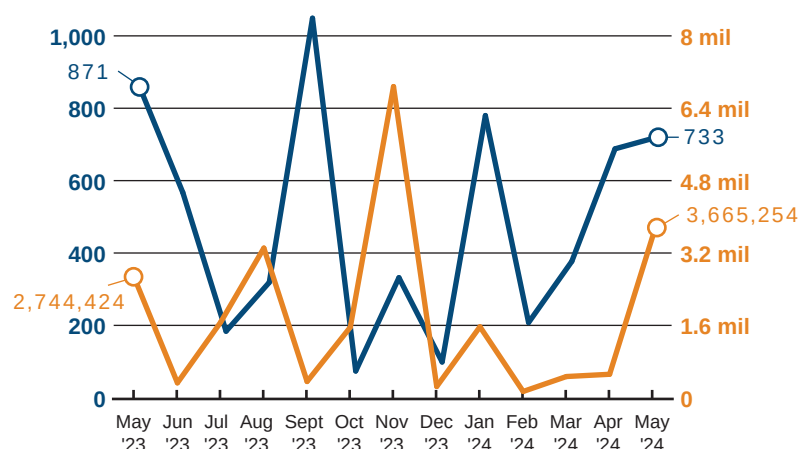
Location of Development

- Residential
- Non-Residential
- Subdivisions and Lot Line Adjustments
- Stormwater Management

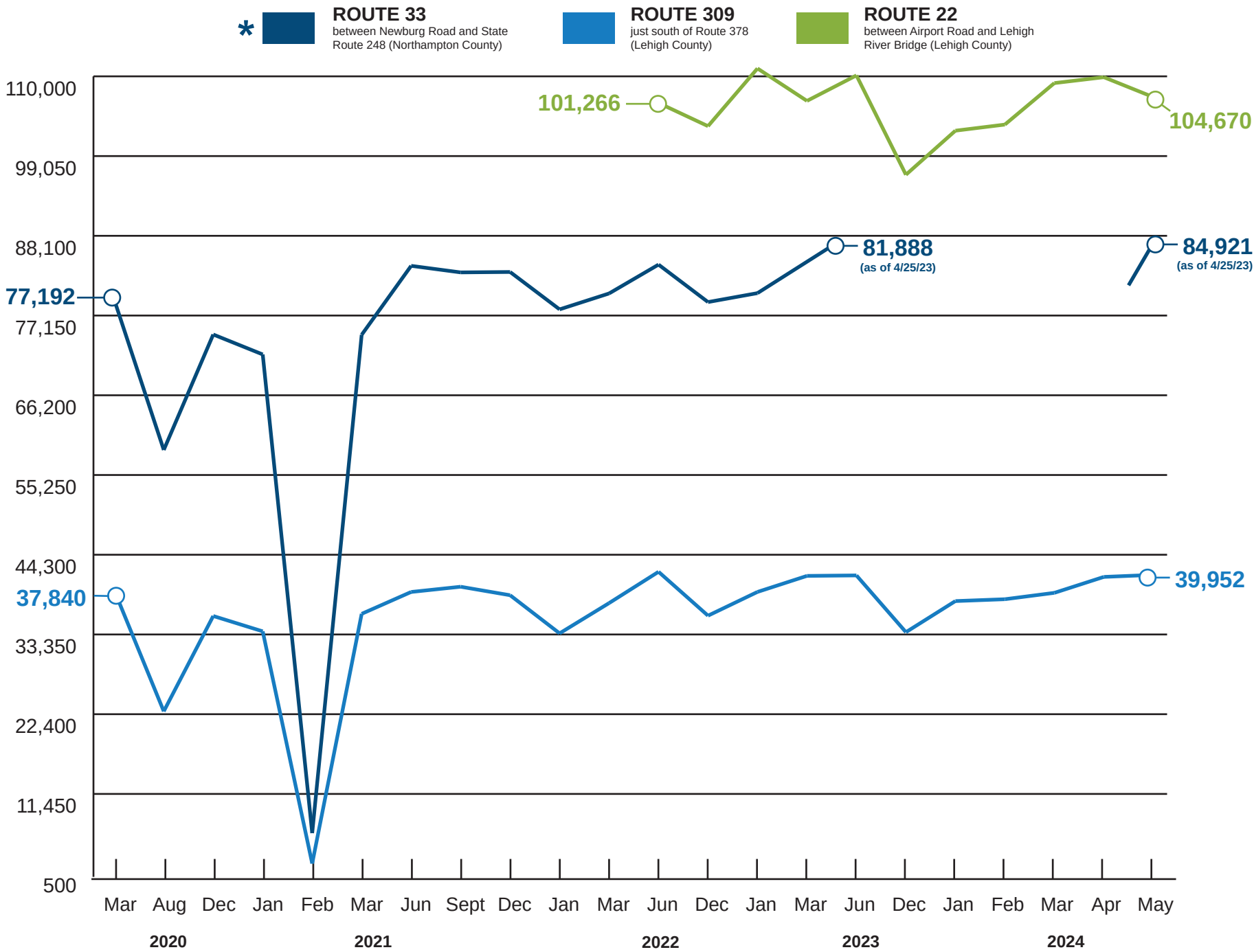


Year to Date (Year to Year)

Residential Units Non-Residential Square Footage



TOTAL VEHICLE TRAFFIC



TOTAL TRUCK TRAFFIC

