

> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

# LEHIGH VALLEY PLANNING COMMISSION MEETING Thursday, March 28, 2024, at 7:00 PM Via Microsoft Teams AGENDA

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

Roll Call

**Courtesy of Floor** 

### Chairman's Report

- 1. LVPC Office Relocation
  - a. <u>New Address as of May 1, 2024</u> 615 Waterfront Drive, Suite 201, Allentown, PA 18102

### Minutes

1. ACTION ITEM: Minutes and Review of Roll Call Actions of the February 22, 2024, Commission Meeting (JD)

### **Comprehensive Planning Committee:**

- 1. ACTION ITEM: Allen Township Land Use of Regional Significance Northampton Business Center (SN, BH)
- 2. ACTION ITEM: Comprehensive Planning Committee Summary Sheet (SM)

### **Environment Committee:**

- ACTION ITEM: Federal Energy Regulatory Commission Preliminary Permit Application for Chain Dam Hydroelectric Project, Palmer Township/City of Easton (SSM)
- 2. ACTION ITEM: Comment Letter on the Draft 2024 Lehigh Valley Hazard Mitigation Plan (SR)
- 3. ACTION ITEM: Environment Committee Summary Sheet (SR)
- ACTION ITEM: Comment Letter to the Ad Hoc Pennsylvania Department of Environmental Protection Committee on Proposed Stormwater Best Management Practices for Karst Terrain (SSM)

### **Transportation Committee:**

1. INFORMATION ITEM: Release of the Pennsylvania Department of Transportation Lehigh Valley Passenger Rail Feasibility Analysis (BB)

### **Old Business:**

- 1. ACTION ITEM: Adoption of the Priority Climate Action Plan for Transportation Decarbonization (BB)
  - a. https://lvpc.org/climate-action
- 2. INFORMATION ITEMS: Activity Reports:
  - a. Monthly Subdivision, Land Development, Stormwater and Municipal Ordinance/Plans Report (SN)
  - b. Highway Traffic Monitoring (BH)

### **New Business:**

1. INFORMATION ITEM: Statement of Financial Interests Form Reminder (HM)

### **Executive Director's Report:**

1. *INFORMATION ITEM:* Carbon Pollution Reduction Implementation Grant Application

### **Communications and Training:**

- 1. INFORMATION ITEM: Morning Call Business Cycle Column (MA)
  - a. Published March 10 "Climate Action is Our Collective Responsibility"
    - lvpc.org/newslv
  - b. Next column: April 14
- 2. INFORMATION ITEM: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA)
  - a. Air Date: March 4 "A New Priority Climate Action Plan with Susan Myerov"
    - wdiy.org/show/plan-lehigh-valley
  - b. Next show: April 1 Lehigh Valley Passenger Rail with PennDOT Director of Rail, Freight, Ports & Waterways, Angela Watson.
- 3. INFORMATION ITEM: Pennsylvania Municipal Planning Education Institute Courses (PMPEI) (MA)
  - a. Zoning Administration: May 2, 9, and 16, from 5:30-9:00 PM

- b. Subdivision and Land Development: September 9, 16, and 23, from 5:30-9:00 PM
- c. Community Planning: October 9, 16, and 23, from 5:30-9:00 PM
- d. Registration and more information at <a href="https://www.lvpc.org/lvga">www.lvpc.org/lvga</a>
- 4. INFORMATION ITEM: Local Technical Assistance Program Virtual Classes (BH)
  - a. April 2: Temporary Traffic Control (Work Zones), 8 am to noon
    - 1. April 3: Temporary Traffic Control Workshop, 8 am to 10 am
  - b. April 23: Public Works Safety, 8 am to noon

Register at <a href="www.gis.penndot.gov/LTAP/">www.gis.penndot.gov/LTAP/</a> or by contacting Hannah Milagio at <a href="mailto:hmilagio@lvpc.org">hmilagio@lvpc.org</a>

### **Next Lehigh Valley Planning Commission Meeting:**

Thursday, April 25, 2024, at 7:00 pm, Virtual

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



CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

### **MEMORANDUM**

**DATE:** March 28, 2024 **TO:** LVPC Members

FROM: Dr. Chris Amato, Chairperson
CC: Becky Bradley, Executive Director
REGARDING: LVPC Office Relocation 2024

The LVPC Office Relocation is underway. The relocation will happen in stages throughout the month of April, and we will be fully moved into the space by May 1<sup>st</sup>.

The new address for LVPC as of May 1, 2024, will be:

615 Waterfront Drive, Suite 201 Allentown, PA 18102



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### **LEHIGH VALLEY PLANNING COMMISSION**

### Minutes from the Thursday February 22, 2024, Meeting

The LVPC held a virtual public meeting on Thursday, February 22, 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**

Sunny Ghai, Philip Ginder, Steve Glickman, Jennifer Gomez, Kent Herman, John Inglis, Diane Kelly, Dennis Klusaritz, Richard Molchany, Christina Morgan, Stephen Repasch and Kevin Schmidt

### **Northampton County**

Christopher Amato, Jessica Cope, Andrew Elliott, Charles Elliott, John Gallagher, Judith Haldeman, Ken Kraft, Carl Manges, John McGorry, Scott Minnich, Steve Melnick, Armando Moritz-Chapelliquen, Grace Crampsie Smith, Tina Smith and Jean Versteeg

### **Members Absent:**

### **Lehigh County**

Phillips Armstrong, Ron Beitler, Michael Drabenstott, Percy Dougherty, Bob Elbich, Santo Napoli, Owen O'Neil, and Matthew Tuerk

### **Northampton County**

Darlene Heller, Rachel Leon, Lamont McClure, Edward Nelson, Salvatore Panto, Jr. and J. William Reynolds

**Staff Present:** Joey Dotta, Steve Neratko, Becky Bradley, Matt Assad, Mackenzie Geisner, Susan Myerov, Patrick Osei, Denjam Khadka and Hannah Milagio

**Public Present:** Jeff Ward (WFMZ), Jay Bradley (PBS39), Kurt Bresswein (Lehigh Valley Live), Emily Zuluaga and Julia Sullivan

### **COURTESY OF THE FLOOR**

No members of the public spoke during courtesy of the floor.

### **CHAIR'S REPORT**

Chair Amato welcomed three new commissioners of the LVPC Ken Kraft, Grace Crampsie Smith and Jean Versteeg. Chair Amato opened the floor to the new commissioners where they said they were excited to be a part of the LVPC.

### **MINUTES**

Chair Amato stated that the minutes of the Thursday, January 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 Morgan made a motion to approve the minutes and Commissioner Glickman seconded the motion.

Chair Amato asked for any comments or questions. There were none. The motion passed. Commissioner Kelly and Commissioner Kraft abstained.

### COMPREHENSIVE PLANNING COMMITTEE

# ACTION ITEM: City of Allentown – Land Use of Regional Significance – Muhlenberg College Seegers Union Building Expansion

Mr. Dotta presented a proposal for an expansion of Seegers Union student center on the Muhlenberg College campus. The project proposes new pedestrian and utility/stormwater infrastructure improvements and adds an outdoor seating area. The additional crosswalks 'provide a safe, well-maintained transportation network to move people' and the inclusion of an ADA compliant ramp and parking spaces helps 'ensure transportation accessibility for all persons.' The proposed green roof is a valued addition to the development and encourages 'sustainable building, site design and community design practices.' More detail is encouraged on the plan about what the green roof entails and may look like.

Chair Amato called for a motion to accept the staff comments. Commissioner Manges made the motion, and Commissioner Minnich 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 Morgan abstained.

# ACTION ITEM: Hanover Township (LC) – Land Use of Regional Significance – Lehigh Valley International Airport Hotel

Mr. Neratko presented a proposal for a hotel to be developed in two phases. Phase one will be the construction of 22,356 square feet with 145 rooms and associated parking. Phase two will be a 4,108-square-foot addition to the structure adding 28 additional rooms for a grand total of 26,464 square feet with 173 rooms at 3311 Airport Road. Incremental development along the Airport Road corridor may impact traffic management strategies with traffic signals and vehicle movements and the LVPC recommends coordination with PennDOT.

Mr. Neratko noted there will be some logistical changes to the driving and parking areas and recommended that a truck turning template be developed to display the largest emergency vehicle's ability to access the site, and that the municipality and associated emergency services confirm the access configuration to meet emergency service needs. There are no oversized parking spaces depicted on the plans for the hotel and the LVPC recommends that one or more oversized parking spaces be provided given the proximity to U.S. Route 22.

Mr. Neratko noted that after the committee meeting, language recommending that the developer ensure adequate parking for the needs of the facility was added.

Chair Amato called for a motion to accept the staff comments. Commissioner Molchany made the motion, and Commissioner Manges 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 Versteeg 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 a zoning ordinance amendment in Hanover Township Northampton County.

Chair Amato called for a motion to accept the staff comments. Commissioner Repasch made the motion, and Commissioner Moritz-Chapelliquen 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 Versteeg abstained.

### **ENVIRONMENT COMMITTEE**

# ACTION ITEM: County SALDO Review - Northern Lehigh School District Baseball & Softball Field Renovations - Slatington Borough

Mr. Khadka presented a county subdivision and land development ordinance (SALDO) review for the Northern Lehigh School District Baseball and Softball Field Renovations in Slatington Borough. The LVPC serves as the official municipal Planning Commission for Slatington Borough, in addition to its role as county planners. Therefore, this review is regulatory per the County Subdivision and Land Development Ordinance.

Mr. Khadka noted that the LVPC reviewed the application and recommends conditional approval of the preliminary plan, pending compliance with the standards of the Lehigh County SALDO. Based on review of the plans and calculations relative to the stormwater management requirements in the Lehigh County SALDO, Mr. Khadka noted several deficiencies. The applicant has not demonstrated compliance with the Act 167 Ordinance dated April 2006.

The provisions of the Act 167 Ordinance were not satisfied and mentioned by Mr. Khadka. The deficiencies are noted here. The exfiltration needs to be deducted in the hydrograph routing for the existing and proposed basin. The proposed infiltration basin detail is incorrect for the depth and/or elevation of the topsoil. The proposed infiltration basin routings indicate the freeboard to the spillway invert is not met. Hydrologic Soil Group B should be used for the hydrograph calculations pre- and post-development. All existing and proposed land cover needs to be clearly labeled on the drainage area maps. Compatibility with National Pollutant Discharge Elimination System requirements needs to be demonstrated through approval by the Lehigh County Conservation District.

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

Commissioner Glickman asked Mr. Khadka if he was able to clarify and identify an area on the site plan. Mr. Khadka explained what the area in question represented.

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

### TRANSPORTATION COMMITTEE

### **ACTION ITEM:** Transportation Committee Summary Sheet

Transportation Committee Chair Kent Herman summarized the Committee meeting that occurred hours before that included PennDOT Multimodal Transportation Fund (MTF) and Transportation Alternatives Set-Aside (TASA) Projects Report. The Eastern PA Freight Alliance: Freight Infrastructure Plan Update and Lehigh Valley Passenger Rail Analysis were also discussed. Finally, an action item concerning a street vacation petition received from the city of Allentown was forwarded to Chair Amato for official action.

Chair Amato called for a motion to accept the staff comments. Commissioner Molchany made the motion, and Commissioner Herman 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.

### **OLD BUSINESS:**

ACTION ITEM: Lehigh Valley Priority Climate Action Plan for Transportation Decarbonization
Ms. Myerov presented the plan that includes a list of strategies to mitigate the impacts of climate change by reducing greenhouse gas (GHG) emissions from one of the Allentown-Bethlehem-Easton Metropolitan Statistical Area's (MSA) top sources - the transportation sector. The MSA includes Lehigh, Northampton and Carbon counties in Pennsylvania and Warren County in New Jersey. The transportation sector was

and Carbon counties in Pennsylvania and Warren County in New Jersey. The transportation sector was selected as the focus for this PCAP, as it was determined to be one of the largest sources of GHG emissions in the region. It is also the area where we can have the greatest impact because it provides access to billions of dollars of state and federal decarbonization funding streams, many of them created through the Infrastructure Investment and Jobs Act and the Inflation Reduction Act.

Ms. Myerov briefed the Commission on each of the six GHG reduction measures and associated emission reduction estimates that were detailed in the plan. It was summarized that potential GHG emission reductions resulting from the measures outlined in this plan are estimated at 321,000 metric tons of CO<sub>2</sub>e annually by 2050, a reduction from 2021 transportation sector emissions by nearly 12%.

Next, Mr. Neratko presented a review of the draft PCAP and found that it fulfills several goals and policies outlined in *FutureLV: The Regional Plan, Walk/RollLV*, the two county Livable Landscapes, as well as LANTA's plans including Moving LANTA Forward and an Enhanced BRT Strategy. Within *FutureLV*, the LVPC is tasked with researching, writing and implementing specific plans and the development of the Priority Climate Action Plan fulfills this role. Each of the six GHG measures was reviewed against *FutureLV: The Regional Plan* goals.

Chair Amato asked for any comments or questions.

Chair Amato commented his excitement for measure five and the draft plan is an excellent starting point. Commissioner Melnick thanked the staff for their work and commented that some of the measures may be wishful thinking. He asked if alternative fueling is something that the LVPC can even help with. Ms. Bradley responded that the LVPC does have influence on the deployment of alternative fueling infrastructure that is supported by LVTS's alternative transportation plan that will eventually come. She noted that many MPOs are working on alternative transportation plans. She finished by saying that the adoption of electric vehicles is increasing across the Lehigh Valley and that future capacity will eventually be planned.

Commissioner Morgan commended the staff on their presentation at the meetings so far and this one. She expressed that there is interest throughout the Valley and is looking forward to continued cooperation. Commissioner McGorry commented that 15% of cars being sold are electric vehicles and asked Ms. Bradley's opinion. Ms. Bradley noted the increase compared to recent years and the numerous companies that are continually innovating. Mr. Assad added that the projected increases are modest and still are a sizable increase. Commissioner McGorry noted his concern of the pricing of the vehicles and Ms. Bradley concurred and said that it would likely become more competitive. Commissioner Molchany commented that the 15% increase is resulting in reinvesting in local electric grids.

Commissioner Moritz-Chapelliquen added that he would echo Ms. Bradley's points and that the most exciting part of the draft plan is general quality of life and community wellness measures.

Commissioner Molchany commended the plan and said that it is of upmost importance for Lehigh Valley residents. Commissioner Molchany urged that the LVTS be made more aware of this plan's information and thanked the LVPC staff for their work.

Commissioner Repasch expressed his excitement and concern for measure five specifically regarding greenery that may attract wildlife near highways.

Commissioner Ghai added there will likely be a transition between gas and electric vehicles with hybrid vehicles. Ms. Myerov answered that alternative fuel vehicles are intended to be all-encompassing and include those types of vehicles.

Commissioner Versteeg commented that the bicycle corridors are a great idea and added that it is generally difficult to bike in the Lehigh Valley due to the hills. Commissioner Versteeg commented that e-bikes may be an eventual alternative.

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

### **INFORMATION ITEMS:** Activity Reports

Chair Amato notified the Commission that activity reports are included in the meeting packets and will not be presented.

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

### **NEW BUSINESS:**

### INFORMATION ITEM: Annual Report

Mr. Neratko briefed the Commission members on the recently completed Annual Report. The first part, BuildLV, covered 2023 plan activity that was over 1,250 reviews including land development plans, municipal ordinance updates, stormwater management plans, transportation impact studies, parks and recreation, and sewer and water availability. Almost one-half of the 70 grant funding review letters were related to park and recreation facility improvements as residents continue to seek more active lifestyles. Other reviews included 61 sewage facilities and solid waste plans and 153 reviews for Pennsylvania Department of Environmental Protection permits, marking another busy year for reviews.

The 4,916 housing units proposed in the Lehigh Valley in 2023 is 26.7% higher than the 10-year average following the housing downturn. 2023 was one of the most balanced years for residential units by type in recent memory. Non-residential reviews remained high, and the LVPC reviewed 21.4 million non-residential square feet throughout the year.

Next, Ms. Geisner presented an interactive map of plan activity and varying land uses in the Lehigh Valley from 2019 to 2023. Mr. Neratko wrapped up the first part of the Annual Report presentation with a brief explanation of multi-municipal planning efforts.

Mr. Osei presented the Long-Range Transportation Plan (LRTP) update in 2023 following the Transportation Needs Assessment. As part of this plan, over 120 different data sets were mapped and examined to equitably prioritize needs for future funding, including an update to LVPC's Equity Analysis of the Lehigh Valley to incorporate Federal Justice40 guidelines, which require 40% of transportation funds be utilized for or within disadvantaged communities. Ms. Myerov followed with PCAP which is focused on the transportation sector to provide the best opportunity to have a major impact on reducing GHG emissions.

Ms. Milagio continued the Annual Report presentation with the updated Public Participation and Limited English Proficiency plans, as part of the development of *Planning for All: Increasing Equitable Access to Planning in the Lehigh Valley.* Mr. Osei mentioned details of the Walk/RollLV: Active Transportation Plan adopted by LVPC and LVTS in 2020. In 2023, the LVPC furthered implementation of Walk/RollLV by managing 11 applications submitted for Pennsylvania's Transportation Alternatives Set-Aside funding.

Ms. Milagio presented the various training and engagement activities the LVPC does and local partners that help make them happen. Mr. Assad wrapped up the Annual Report presentation by going over outreach efforts that include a regular column in the Sunday Morning Call reaching 40,000 doorsteps and 70,000 devices, a monthly National Public Radio show, Plan Lehigh Valley on WDIY 88.1 FM, and a monthly half-page Development Snapshot in the Lehigh Valley Business Journal consumed by 12,000

subscribers. The LVPC in 2023 also kept people updated on meeting schedules, new data and grant opportunities through daily Facebook, LinkedIn, Instagram and X updates.

Ms. Bradley closed it out by thanking the staff and commissioners for their continued commitment and work for the Lehigh Valley.

Chair Amato congratulated the staff and asked for any comments or questions.

Commissioner Moritz-Chapelliquen jokingly asked how much coffee was consumed to get the report done and thanked the staff.

### INFORMATION ITEM: Local Government Survey Results

Ms. Milagio presented some results from the recent Local Government Survey. The survey asked partners to rank the greatest challenges to their work and communities. It then asked partners to rank their greatest land use-specific challenges. And finally, municipal partners identified their top training need as the roles and responsibilities of governing bodies in the land use and zoning processes. Top results for each question were shared and Ms. Milagio noted several opportunities for training related to the answers.

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

### **EXECUTIVE DIRECTOR'S REPORT:**

### INFORMATION ITEM: LVPC Updates and Annual Training Part 2

Ms. Bradley presented a continuation of Commissioner Training and detailed what laws the LVPC works within. The applicable laws include the Pennsylvania Municipal Planning Code (MPC), Pennsylvania Storm Water Management Act, Sewage Facilities Act, Solid Waste Management Act, Public Utility Code, Delaware River Basin Compact, and the United States Code, Title 2 and 40, as enacted and amended in conjunction with the Inflation Reduction Act. Ms. Bradley then briefly discussed the roles and structure of LVPC versus LVTS.

Chair Amato asked for any comments or questions.

Commissioner Molchany extended an invite to any LVPC Commissioner who wishes to attend LVTS meetings. He stated that LVPC is vital to the running of the MPO and helps meet federal requirements. Both the LVTS and LVPC differ in roles but are integral to promoting the best interest of the Lehigh Valley.

### COMMUNICATIONS AND PUBLIC ENGAGEMENT:

### INFORMATION ITEM: Morning Call Business Cycle Column

Mr. Assad spoke about the most recent Morning Call column focused on our newly updated Public Participation and Limited English Proficiency Plans, through the lens of how the region has become so much more diverse over the past four decades. The next column will look at the Priority Climate Action Plan you heard about earlier. That column will run March 10.

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 February 5 on WDIY FM 88.1 and covered the Public Participation and Limited English Proficiency Plan updates. Ms. Bradley was joined by LVPC Managing Editor Matt Assad, LVPC Regional Planner for Community Engagement, and LVPC Senior Community Planner Jill Seitz. That 30-minute show is now streaming at LVPC.org and WDIY.org.

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

### INFORMATION ITEM: Local Technical Assistance Program Virtual Classes

Ms. Milagio presented dates and times for five upcoming Lehigh Valley Government Academy classes occurring in the next few weeks.

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

### INFORMATION ITEM: PennDOT Connects 2024 Municipal Outreach Meeting

Mr. Osei presented an upcoming event to improve your local roads and transport with PennDOT Connects. The event is on May 16, 2024, from 1 PM to 3 PM at the PennDOT Engineering District 5 office. Mr. Osei urged people to come and share ideas, meet others, and plan for better transport together. Participants can join in person at District 5 or online with Go-To-Webinar.

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

### **INFORMATION ITEM:** Grants

Mr. Osei presented three upcoming grant opportunities which are Rebuilding American Infrastructure with Sustainability and Equity (RAISE) discretionary grant program, the Bridge Investment Program's "Planning" and "Bridge Project" categories for bridge improvements, and the Safe Streets and Roads for All (SS4A) discretionary program.

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

### **ADJOURNMENT:**

Chair Amato stated that the next LVPC meeting is set to be virtual on March 28 at 7pm. 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



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

March XX, 2024

Mr. David Austin, Chair Allen Township Planning Commission 4714 Indian Trail Road Northampton, PA 18067

Re: Northampton Business Center Lot 3 – Land Use of Regional Significance Allen Township Northampton County

Dear Mr. Austin:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, under the requirements of the Pennsylvania Municipalities Planning Code (MPC). The meeting details include:

### **LVPC Comprehensive Planning Committee Meeting:**

Tuesday March 26th, 2024, at 12:00PM

https://lvpc.org/lvpc-meetings

### **LVPC Full Commission Meeting:**

Thursday, March 28, 2024, at 7:00PM

https://lvpc.org/lvpc-meetings

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 application proposes construction of a 295,760-square-foot warehouse with associated improvements with loading docks, tractor-trailer parking and a parking lot on Lot 3 at 2893 Howertown Road (PINS L492A & L493).

The LVPC offers the following comments:

### **Site Access**

The proposed facility is located across State Route 3017 "Howertown Road" from the Northampton Business Center complex. At the date of this review, this complex is under construction and partially operational. The existing Northampton Business Center on the east side of Howertown Road has an associated truck courtyard "staging area" centrally located. The LVPC recommends signage to notify commercial vehicles waiting or needing

to stage that these spaces are available. The spaces in this staging area have electrical hook ups to allow certain trucks to not run internal combustion engines while staged and waiting. This supports Policy 2.2 of *FutureLV: The Regional Plan* by capitalizing on existing infrastructure', 'reducing transportation-related emissions and 'climate change impacts through mitigation' (Policy 3.4).

The LVPC encourages developers of these sites to address the escalating need for overnight tractor-trailer parking and staging space. Providing staging, parking, and designated rest areas for truck drivers would mitigate the growing unmet need in the region of truck drivers running out of hours and parking in less desirable locations.

### **Emergency Access**

The LVPC commends the inclusion of emergency access drives on the western north and south sides of the proposed building which enhances planning and emergency response (of Policy 5.1). The LVPC strongly recommends that the utilization and operation of these access drives be clarified to support planning for emergency management and maintenance, especially in the event of an emergency or winter weather event (of policies 2.2).

### **Transportation Network Mobility**

Truck parking and passenger vehicle parking lots should be prepared for the future of electric vehicles by providing the necessary vehicle charging infrastructure that may be required. The LVPC recommends that passenger vehicle parking lots for the project should also include charging infrastructure as the emergence of electric vehicles becomes more prevalent (of Policies 2.5, 3.2 and 3.4).

### **Multimodal Transportation Considerations**

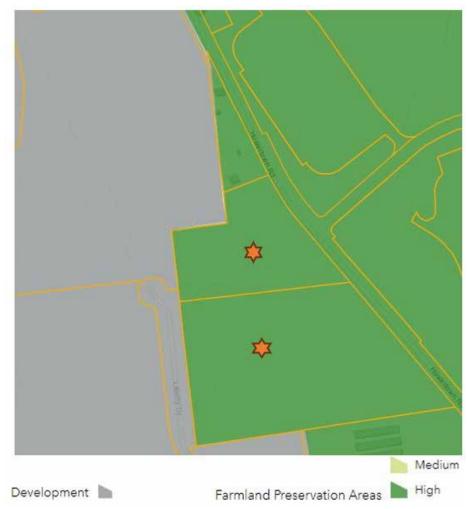
The LVPC strongly recommends that sidewalks be added leading to Howertown Road and the access point across from Cesanek Road and that sidewalks be included from the Liberty Drive existing sidewalks to the western side of the proposed building. The LVPC recommends pavement marked crosswalks and pedestrian crossing signage across Howertown Road leading the established sidewalks along Cesanek Road. These additions would support Policy 5.1 to 'promote safe and secure community design', 'create community spaces that promote physical and mental health' (Policy 5.3), and 'strengthen sidewalk, bike route and trail infrastructure' (of Policy 5.3).

### Bicycle Rack

The LVPC recommends that a bicycle rack be included into the development plans. For many people a bicycle is their primary mode of transport. The inclusion of a bicycle rack would help to ensure transportation accessibility for all persons, (of Policy 5.2), by integrating mixed-transportation into the development plans (of Policy 5.2). Many people use public transportation in whole or in part in combination with a bicycle for their commutes and adding a bicycle rack would help to 'improve connections between bus stops and bicycle infrastructure' (of Policy 5.2).

### **Farmland Preservation Area**

This location is within a farmland preservation area and is on the boarder of a development area as shown in the following image. Farmland preservation areas are areas that are predominantly agriculture and are recommended to remain agriculture. The types of uses recommended in these areas include agriculture and related housing and businesses, parks and open space, and housing not related to agriculture on a very limited scale.



The parcels proposed for development are indicated above with orange stars. Gray shading indicates a development area while green shows high level farmland preservation areas based on the General Land Use Map.

### **Agricultural Lands**

The southernmost parcel of the two parcels in this proposal are agricultural lands. The LVPC supports the 'preservation of farmland to maintain rural character and provide open space' (Policy 3.3) and encourages 'preserving farmland of all sizes, when possible' (of Policy 3.3).

### **Character-Defining Area**

Both parcels on within a character-defining area. These areas represent the natural and scenic character of the Lehigh Valley as a simplified version of the Natural Resources Plan, with highest elevation areas representing scenic resources. The types of uses recommended are parks and open space, woodlands, agriculture, and low-intensity, limited-scale development that preserves natural and scenic resources.

### **Karsts**

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

### **Stormwater Review**

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

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 to help to 'reduce climate change impacts' (Policy 3.4)."

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Sincerely,

Bambi Griffin Rivera

Senior Community and Regional Planner

Brian Hite

Transportation Planner

cc: JW Developer Partners c/o Eric Scheler, Applicant; The Pidcock Company / Brent Tucker, PE, Project Engineer/Surveyor; Stan Wojciechowski, Township/Borough Engineer; Denjam Khadka, LVPC Senior Civil/Environmental Engineer;

Steve Neratko, LVPC Chief Community and Regional Planner;

Geoffrey A. Reese, PE, LVPC Master Planner and Engineer



# **Project Review Summary Sheet**

Comprehensive Planning Committee Date: March 2024

Comprehensive	laming John		Date: March 2024		
Project	Municipality	Brief Statement of Purpose	LVPC Comment		
Zoning Ordinance Amendment	Borough of Walnutport	450-34(8) of Chapter 450 - Bed and Breakfast - The proposed additional regulations for applications and licensing increase the detail of the ordinance and further clarifies what is permitted for the sustained operation of a bed and breakfast.	The LVPC recommends that the applicant, under Section 450-34(8)(D) Bed and Breakfast Standards, remove potential redundancies regarding signage requirements and more detail be added regarding the purpose of the minimum number of days a guest must stay.  The LVPC encourages the applicant to cross-reference potential redundancies and/or contradictions with Chapter 165 Construction Codes, and proofread the amended changes for potential grammatical errors.		
Zoning Ordinance and Subdivision and Land Development Ordinance Amendment	Weisenberg Township	Codification 2024 - Proposes to codify existing Township ordinances into a single comprehensive code of Township ordinances. LVPC's review of the codification ordinance pertains to specific revisions to the Township Subdivision and Land Development Ordinance and Zoning Ordinance at time of adoption of code.	While the revisions to the SALDO and Zoning Ordinance through the codification process are minor and do not substantially change the original ordinance, the LVPC commends the Township for consolidating and reorganizing its code into a single uniform format, a best practice in improving its usability and for managing municipal regulations (of Policy 1.4).		



# **Project Review Summary Sheet**

Comprehensive	Planning Comm	ittee	Date: March 2024	
Curative Amendment	City of Bethlehem	Building Length in Limited Commercial Zoning District - The Petitioner has submitted a challenge and curative amendment to the Zoning Ordinance of City of Bethlehem. The Petitioner desires to develop the site with a residential apartment use permitted as Multi- Family Dwellings in the City's Zoning Ordinance.	The LVPC finds that while the proposed higher density multi-family residential land use has the potential to align with <i>FutureLV: The Regional Plan</i> , the reasoning of the curative amendment does not appear to have merit, and the ordinance amendment conflicts with public health, safety and welfare.	
Zoning Ordinance Amendment	East Allen Township	Intensive Agriculture Conditional Uses - Amends the Township Zoning Ordinance by adding definitions and specific standards for Intensive Agriculture conditional uses.	Overall, the provisions provide for the needs of regional farming operations and support agriculture as essential to the region's economy while minimizing environmental impacts of development and land use operations in consideration of the public health safety and welfare (of Policy 3.2).	
Curative Amendment	Palmer Township	Manufactured/Mobile Home Parks - The Petitioner has submitted a challenge and curative amendment to the Zoning Ordinance of Palmer Township. The Petitioner desires to develop the site with 182 mobile homes and is filing the challenge on the grounds that the ordinance fails to make any provision for mobile home parks.	The LVPC finds that while the challenge to the Township's ordinance appears to have merit, the curative amendment conflicts with the interests of public health, safety and welfare and does not align with <i>FutureLV: The Regional Plan.</i> While portions of the site may be capable of residential development at a limited scale, the site layout shown on the submitted Manufactured/Mobile Home Park Plan conflicts with environmental hazards present on the site and several outstanding concerns threaten loss of life and property for future potential residents in this location.	



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

March XX, 2024

Ms. Debbie-Anne A. Reese, Acting Secretary Federal Regulatory Energy Commission 888 First Street, NE, Room 1A Washington, DC 20426

> Re: Federal Regulatory Energy Commission - Preliminary Permit Application Lock 47 Hydro, LLC - Chain Dam Hydroelectric Project Palmer Township/City of Easton Docket No. P-15337

Dear Ms. Reese:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on March 28, 2024, reviewed the above-referenced application based on the adopted plans and policies of the LVPC. We offer the following comments and questions.

The applicant submitted a preliminary permit application to the Federal Regulatory Energy Commission to secure and maintain priority of licensing for a proposed project at the existing Lehigh River Chain Dam. The permit application notes the need to secure and maintain priority of licensing while obtaining the necessary data and information to determine the feasibility of the project. The proposed feasibility study is anticipated to include engineering, environmental, socioeconomic, economic and financial analyses, as well as consultations with federal, state and local agencies, authorities and stakeholders. Under the preliminary permit, no earth-disturbing activities are allowed to take place. The proposed term of the permit is four years.

The Chain Dam spans the Lehigh River, with a length of approximately 700 feet and height of 20 feet, and abuts land owned by Palmer Township and the City of Easton, including Riverview Park and Hugh Moore Park. About 500 feet upstream of the Dam is the entrance to the Lehigh Canal. The Dam feeds the adjacent portion of the Canal.

The proposed project would involve the installation of two new turbine bays, four new identical turbine generator units, a new control building housing the electrical equipment and controls for the turbines, and a new 2,900-foot-long underground transmission line extending from the turbine generator units to an existing utility pole on Lehigh Drive. In addition, there is an existing fish passage on the Dam that would be modified to encourage fish to use the entrance. The proposed project is estimated to generate an average of 10,500 megawatt-hours of electricity annually.

The use of hydropower aligns with the *FutureLV: The Regional Plan* action to support renewable energy and diversification of sources (of Policy 3.4). The LVPC *Climate + Energy Element* also supports the

diversification of energy sources that lower cost and carbon emissions and reduce impacts to the environment (of Energy Goal 3).

The Lehigh River represents a very high conservation priority in the Natural Resources Plan component of FutureLV. FutureLV further promotes the preservation of priority environmental, historic, cultural, scenic and agricultural assets in the region (Policy 1.3). The Lehigh Canal, Hugh Moore Park and Chain Dam are part of the cultural heritage of the Delaware and Lehigh National Heritage Corridor. The proposed project should clearly evaluate potential impacts to these important features as part of the feasibility study. To that end, we have prepared the following questions that we recommend be considered and addressed as part of the feasibility study:

- 1. The chain dam was damaged by a significant breach due to ice flows in 1965. What are the precautionary measures being implemented to reduce the impacts from such natural hazards?
- 2. The project description indicates that fish passage is intended to provide passage for blueback herring, alewife, American shad and other Alosines and that the existing fish passage structure is believed to require upgrades to make it more effective. The Pennsylvania Fish and Boat Commission reported a steep decline in American Shad migration since 2001. We encourage the applicant to implement recommendations from the Pennsylvania Fish and Boat Commission, US Fish and Wildlife Service, and National Oceanic and Atmospheric Administration/National Marine Fishery Service when designing a new or upgraded fish passage on this site. Additionally, the feasibility study should describe expected migration percentages from downstream to upstream and proposed mitigation measures should these percentages fall short of projections.
- 3. The preliminary permit application indicates that the maximum storage capacity of the reservoir is 1,197 acre-feet. The feasibility study should clarify whether this figure will change due to the hydroelectric operation and whether there will be extra ponding upstream. This includes assurances that there will be adequate flow to the canal to support the continued operation of the National Canal Museum and the Delaware and Lehigh National Heritage Corridor.
- 4. The flow duration curve shows that the flow varies approximately between 500 cubic feet per second (cfs) to 18,000 cfs, and the hydroelectricity production starts when the river flow is higher than 547cfs. It appears that there will be at least one unit in operation year-round. We recommend information be included that shows the cutoff values at which flow in one unit starts generating and when all four units will be operating.
- 5. The proposal notes that the project will have de-minimis effect on land, water and other resources in the project area. The feasibility study should share results from impact studies, especially on minimum water flow, water quality, change in temperature and impact on endangered species.
- 6. The feasibility study should explain how the dam operates during low flow and high flow and describe negative effects from the hydropower operation during low flow and high flow.
- 7. Since this is a recreational area, proposed restrictions for recreational activity in or near the dam after the hydroelectric project is operational should be included.

We hope t	hese com	ments a	are helpful	in preparing	for the	next phase	of this	proposed	project.	Please
feel free to	contact u	is if you	have any	questions.						

Sincerely,

Susan Myerov, AICP Director of Environmental Planning

Denjam Khadka Sr. Environmental Engineer



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

March 25, 2024

Mr. Thomas Guth Hazard Mitigation /Disaster Recovery Manager Northampton County Emergency Management Services 100 Gracedale Ave Nazareth, PA 18064

Ms. Tanya Hook, Director Lehigh County Office of Emergency Management 640 W Hamilton Street, 8th Floor Allentown, PA 18101

Re: 2024 Lehigh Valley Hazard Mitigation Plan

Dear Mr. Guth and Ms. Hook:

The Lehigh Valley Planning Commission (LVPC) will consider the above-referenced plan at the following Environment Committee and Full Commission meetings. A revised letter will be provided based on any additional comments from the Committee and Commission.

### **LVPC Environment Committee Meeting:**

March 26, 2024, at 10:30AM <a href="https://tinyurl.com/LVPC2024">https://tinyurl.com/LVPC2024</a>

### **LVPC Full Commission Meeting:**

March 28, 2024, at 7:00PM www.tinyurl.com/LVPC2024

Hazard mitigation planning reduces the long-term risk to life and property by minimizing the impact of disasters through identification of the risks and vulnerabilities for an area then developing actions for protecting life and property from similar events. The Lehigh and Northampton County Emergency Management Agencies recently prepared a draft 2024 Hazard Mitigation Plan for the Lehigh Valley. Federal regulations require that local governments update the plan every five years, while monitoring and evaluating the data, events and actions that make up the plan. The 2024 Lehigh Valley Hazard Mitigation Plan is the fourth for the region, updating plans adopted in 2006, 2013 and 2018. For local communities to have access to federal hazard mitigation funding, they must both participate in and adopt the plan. Participation includes attending meetings, completing various worksheets and providing actions to mitigate hazards.

The LVPC identified the *FutureLV: The Regional Plan* goals, policies and actions related to each of the eight hazard mitigation plan goals, which show how closely aligned the plans are, integrating hazard mitigation planning with comprehensive planning. The Hazard Mitigation Plan goals are:

1. Minimize the risk to human life associated with natural and non-natural hazards. Aligns with *FutureLV*: Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and actions to "educate the public on hazard impacts and mitigation techniques" and "enhance planning and emergency response efforts among emergency management personnel."

### 2. Promote hazard avoidance, especially in floodplains.

Aligns with *FutureLV:* Goal 3 (Protected and Vibrant Environment) policy to "Minimize environmental impacts of development to protect the health, safety and welfare of the public" and action to "discourage development in hazard-prone areas" and Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and action to "incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains."

# 3. Reduce the damages and functional loss from natural and non-natural hazards to existing and future public and private assets.

Aligns with *FutureLV*: Goal 1 (Efficient and Coordinated Development Pattern) policy to "Maintain regional character by preserving priority environmental, historic, cultural, scenic and agricultural assets" and actions to "protect assets from potential threats" and "enhance the long-term viability of assets."

# 4. Preserve and enhance the effectiveness of natural resources to provide resiliency benefits.

Aligns with *FutureLV*: Goal 1 (Efficient and Coordinated Development Pattern) policy to "Preserve natural areas and farmland by managing growth and development to enhance and strengthen cities, boroughs, suburbs and rural communities" and Goal 3 (Protected and Vibrant Environment) policies to "Conserve and manage natural lands and water resources for environmental and recreational benefits" and "Minimize environmental impacts of development to protect the health, safety and welfare of the public."

### 5. Impacts of natural and non-natural hazards.

Aligns with *FutureLV*: Goal 4 (Competitive, Creative and Sustainable Region) policy to "Promote the fiscal health and sustainability of municipalities" and Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and action to "incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains."

### 6. Improve local regulations to reduce the impacts of natural and non-natural hazards.

Aligns with *FutureLV*: Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and action to "incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains."

# 7. Enhance planning and emergency response efforts among federal, state, county, and local emergency management personnel to protect public health and safety.

Aligns with FutureLV: Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and action to "enhance planning and emergency response efforts among emergency management personnel."

# 8. Promote public awareness on both the potential impacts of natural and non-natural hazards and actions to reduce those impacts.

Aligns with *FutureLV*: Goal 3 (Protected and Vibrant Environment) policy to "Reduce climate change impacts through mitigation and adaptation" and action to "educate elected officials and the public on climate change impacts, adaptation and mitigation" and Goal 5 (Safe, Healthy, Inclusive and Livable Communities) policy to "Promote safe and secure community design and emergency management" and action to "educate the public on hazard impacts and mitigation techniques."

Please notify us upon plan approval by the Federal Emergency Management Agency.

Please call if you have any questions.

Sincerely,

Susan L. Rockwell Senior Environmental Planner



# **Project Review Summary Sheet**

Date: March 2024

### **Environment Committee**

Project	Municipality	Brief Statement of Purpose	LVPC Comment
Revised Sewage Facilities Plan Update (Act 537 Review)	South Whitehall Township	No substantive changes with revised plan update. Purpose of plan remains to recognize public-to-public wastewater disposal system transfer from South Whitehall Township Authority to the Township and ensure Township management of system meets needs of residents. Revised plan map delineates future sewer service expansion areas for Ridge Farms development over the next five to ten years, whereas previous 2023 plan did not. No change to overall future service area.	Previous LVPC comments from October 2023 remain relevant. Proper management of disposal system supports <i>Future LV</i> action to 'protect the quality and quantity of surface water and groundwater' (of Policy 3.2). Ridge Farms development previously found generally consistent with <i>FutureLV</i> . LVPC will provide comments on any future plan update per Act 537 requirements.



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

March XX, 2024

Cristine Vinciguerra, P.G.
Department of Environmental Protection
Regional Permit Coordination Office
Rachel Carson State Office Building
400 Market St. | Harrisburg, PA 17101

Re: PA State Karst Working Group - Stormwater Best Management Practices in Karst Terrain – Draft Guidance

Dear Ms. Vinciguerra:

Thank you for the opportunity for the Lehigh Valley Planning Commission (LVPC) to review and comment on the above-referenced technical guidance document prepared by the PA Karst Working Group. The LVPC is the official planning commission for Lehigh and Northampton counites and operates under a series of federal and state statutes, including the implementation of the County Planning Program, as required by the Pennsylvania Municipalities Planning Code (MPC) (Act of 1968, P.L. 805, No. 247, as enacted and amended), the execution of the County Watershed Management Program, as required by Pennsylvania Storm Water Management Act (Act of 1978. P.L. 864, No. 167, as enacted and amended), and the associated federal Municipal Separate Storm Sewer System Program of the Clean Water Act. The LVPC has been delegated the authority, by both Lehigh and Northampton Counties, to review the stormwater management plan submissions related to land development for each of the 62 municipalities in the Lehigh Valley. The LVPC is acutely aware of the significance of the extensive carbonate bedrock that underlies portions or the entirety of 47 of the 62 municipalities in Lehigh and Northampton counties.

The Stormwater Best Management Practices in Karst Terrain draft guidance provides a great resource for municipalities in Pennsylvania evaluating stormwater control measures in areas with special geologic features as part of its land development process. We recommend, however, that the guidance refers readers to local Act 167 Ordinances (e.g. Monocacy Creek – 2018) to compare and contrast recommended design criteria. For example, discharges directly to sinkholes are prohibited in the Monocacy Creek Ordinance.

In 2002, the LVPC commissioned a comprehensive technical study to provide guidance for stormwater management systems within these special geographic areas of the Little Lehigh Creek Watershed. This information provided guidance in developing standards and criteria for Little Lehigh Creek and then in developing all future Act 167 plans, including the Monocacy. We request

that this technical guidance document be included as an additional resource in Appendix B and incorporated into this guidance document, as appropriate.

In addition to the general comments noted above, we have several questions and suggested edits to consider in this draft:

### Purpose of this Best Management Practice Document

The final paragraph notes that the best local approach to minimize risk in sensitive geologic terrain is to craft stronger comprehensive land use plans that direct new growth away from karst areas to more appropriate locations. This type of approach may be difficult in many of the Lehigh Valley's communities. We agree in principle that these areas should be avoided, but for communities that have significant karst geology, it should be one of the factors in a land development decision. Municipalities with significant karst geology must incorporate the technical guidance included in this document in their local codes as a starting point to fully vet proposals and be mindful of potential impacts should a development be permitted in sensitive geologic areas.

### Section 2.1 – Preliminary Site Assessment

All projects should be required to begin with a desktop preliminary site assessment and require field reconnaissance to verify desktop findings. We also recommend that the analysis of subsurface heterogeneity through geophysical and/or geotechnical techniques be required as part of this stage.

### Section 2.5 - Plan Submittals

We agree with the recommendation that existing sinkholes should be surveyed and recorded on the property deed, as appropriate. This is not currently a requirement in the Monocacy Stormwater Management Plan.

### Section 4.2 – Stormwater Design Principles for Karst

Bullet item #3 – Please provide reference used to define the Contributing Drainage Area (CDA) and surface ponding depth for *centralized stormwater facilities?* (20,000 sf of Impervious Cover and surface ponding depth greater than three feet)

Bullet item #5 – The language notes that designers should maintain both the quality and quantity of runoff to predevelopment levels and minimize rerouting of stormwater from existing drainage for all storms up to the 100 year/ 24-hour storm event. This should be clarified to differentiate between water quality and water quantity treatment. Water quality stormwater control measures should treat up to the 2-yr storm before bypassing to the existing drainage facility. This is consistent with the draft PA DEP Post Construction Stormwater Manual recommendations.

Section 4.5 - Karst Swale Protection for Stormwater Management -

We note that the acronym "IC" is used here for Infiltration Capacity, but elsewhere as Impervious Cover. This should be clarified or corrected.

Section 5.4 - Design Criteria for Specific Stormwater Treatment Practices – Prohibited Practices

Please provide reference to the CDA of 20,000 – 100,000 sq. ft. as the definition of large-scale infiltration. Can you explain considerations related to the use of loading rates?

Section 7 – Definitions

We suggest defining for following terms found in the text but not included in this section:

karren, phreatic zone, regolith, severe stormwater hotspot, vadose zone, vug, zone of aeration

Alternatively, consider removing terms in the definition list which are not referenced in the document (Epikarst, Estavelle, Grike).

The LVPC appreciates the opportunity to comment on this guidance. Please contact us if you have any additional questions.

Sincerely,

Susan Myerov, AICP
Director of Environmental Planning

Geoff Reese, P.E. Master Planner and Engineer

<sup>&</sup>lt;sup>1</sup> Lehigh Valley Planning Commission, Cahill Associates & USFilter, 2002. *Technical Best Management Practice Manual & Infiltration Feasibility Report: Infiltration in Stormwater Areas Underlain by Carbonate Bedrock within the Little Lehigh Creek Watershed.* 



> CHRISTINA V. MORGAN Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP Executive Director

Resolution No. 03-28-24-A
OF THE LEHIGH VALLEY PLANNING COMMISSION
ADOPTING THE CARBON POLLUTION REDUCTION PRIORITY CLIMATE
ACTION PLAN FOR TRANSPORATION DECARBONIZATION

WHEREAS, The Lehigh Valley Planning Commission (LVPC) is organized by the Counties of Lehigh and Northampton to promote the health, safety, and general welfare of the two-county region in accordance with the provisions of the Pennsylvania Municipalities Planning Code, Pennsylvania Stormwater Management Act of 1978, among other statutes both state and federal; and

WHEREAS, The Lehigh Valley Transportation Study ("LVTS") was created in 1964 to serve as the Metropolitan Planning Organization for the Lehigh Valley pursuant to Title 23 of the United States Code and to implement provisions of the Infrastructure Investment and Jobs Act, among other federal statutes; and

WHEREAS, Section 60114 of the Inflation Reduction Act authorized the US Environmental Protection Agency (EPA) under the Climate Pollution Reduction Grants (CPRG) program to provide \$5 billion in grants to states, local governments, tribes, and territories to develop and implement ambitious plans for reducing greenhouse gas emissions and other harmful air pollution; and

WHEREAS, CPRG is a two-phase program provides \$250 million for noncompetitive planning grants to the largest metropolitan areas in the US, and approximately \$4.6 billion for competitive implementation grants; and

WHEREAS, The LVPC received a \$1 million EPA Planning Grant to develop a Priority Climate Action Plan by March 1, 2024, and a Regional Climate Action Plan by June 2025 for the Allentown-Bethlehem-Easton PA/NJ Metropolitan Statistical Area (MSA), which includes Warren County, NJ and Carbon County, PA in addition to Lehigh and Northampton Counties, PA; and

WHEREAS, LVPC chose to focus Priority Climate Action Plan efforts on the sector with the fastest growth in greenhouse gas emissions, transportation, and partnered with the LVTS, as the region's transportation planning board to complete the planning effort; and

WHEREAS, LVTS along with the LVPC, have prepared a regional Priority Climate Action Plan focused on decarbonization of the transportation sector in accordance with EPA's CPRG program guidance; and

WHEREAS, LVTS/LVPC utilized the open, inclusive, public WorkshopLV: Environment and Transportation to discuss, guide and draft priorities. Workshops included residents, businesses, and a variety of partner organizations, agencies, and authorities, who worked create the *Lehigh Valley Priority Climate Action Plan*; and

**WHEREAS,** LVTS/LVPC also, met with Carbon County, PA and Warren County, NJ to engage in the development of the *Lehigh Valley Priority Climate Action Plan*; and

WHEREAS, The intent of the Lehigh Valley Priority Climate Action Plan is to reduce transportation related emissions, improving air-quality and improving human and environmental health. This broad goal is consistent with FutureLV: The Regional Plan, Walk/RollLV: Active Transportation Plan, Northampton County Livable Landscapes Plan, Lehigh County Livable Landscapes Plan, Lehigh, and Northampton Transportation Authority's (LANTA) Moving LANTA Forward Regional Transit Plan and LANTA's Enhanced Bus/Bus Rapid Transit planning; and

WHEREAS, Lehigh Valley Priority Climate Action Plan is consistent with the LVTS and LVPC adopted resolutions to include Health in All policies (Resolutions 9-19-19-A and 10-2-19-B, respectively) and LVTS Vision Zero policy (Resolution 11-15-23-B); and

WHEREAS, Improving green infrastructure is a critical measure of the Lehigh Valley Priority Climate Action Plan and U.S. Route 22, 33, 309, and 378, as well as, the 33 Park and Ride Multimodal Facility offer some of the greatest opportunity to sequester carbon utilizing natural systems services; and

WHEREAS, The LVPC in partnership with the Pennsylvania Department of Transportation wish to apply for CPRG Implementation funding for the US Route 22, 33, 309, 378, Park and Ride Multimodal facilities green infrastructure project by the April 1, 2024 EPA deadline.

**NOW, THEREFORE, BE IT RESOLVED,** that the LVPC adopts the *Lehigh Valley Priority Climate Action Plan* as its official transportation decarbonization policy plan; and

**FURTHERMORE, BE IT RESOLVED,** that the LVPC urges the EPA to award Climate Pollution Reduction Implementation Grant funds to the Lehigh Valley Green Transportation Infrastructure Transformation Project as a means to sequester carbon in areas with high and growing emissions, reduce stormwater runoff, improve water and air quality, create and enhance insect and migratory bird corridors, improve health and wellbeing, especially in Justice 40 equity communities, reduce energy consumption, eliminate major transit safety concerns and develop carbon reduction implementation standards for the entire highway system in the region and beyond.

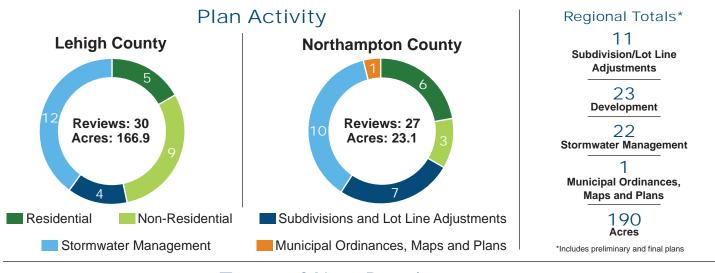
Adopted by the Lehigh Valley Planning Commission on the 28th day of March 2024.

LEHIGH VALLEY PLANNING COMMISSION

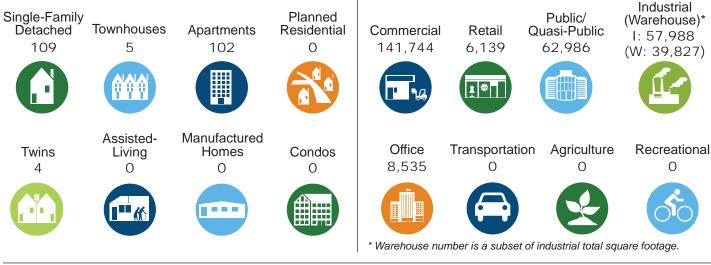
Becky A. Bradley, AICP, Executive Director

# Dr. Christopher Amato, Chair Christian "Tori" Morgan, Vice Chair Armando Mortiz-Chapelliquen, Treasurer ATTEST:



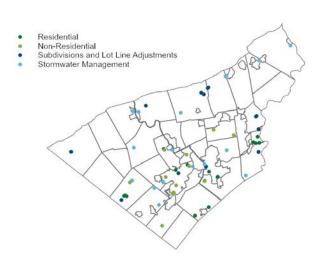


## Types of New Development





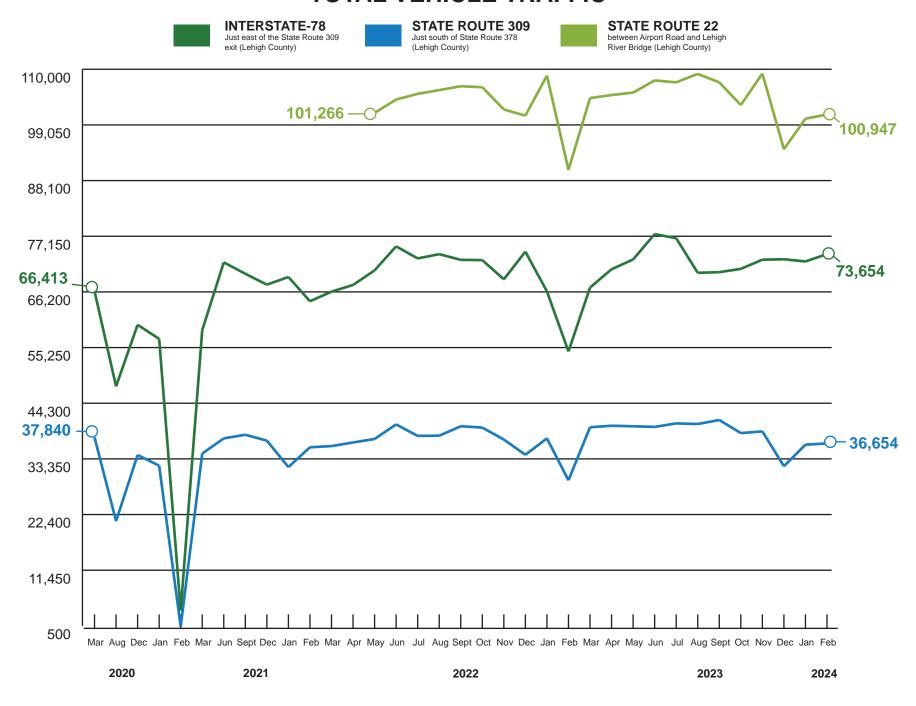
Residential: 220 Total Units



### Year to Date (Year to Year) Residential Units Non-Residential Square Footage 1,000 8 mil 800 6.4 mil 600 4.8 mil 400 3.2 mil 220 200 1.6 mil 277,392 166,0 Feb Mar Apr May Jun Jul Aug Sept Oct Nov Dec Jan Feb

Non-Residential: 277,392 Total Square Feet

# **TOTAL VEHICLE TRAFFIC**



### **TOTAL TRUCK TRAFFIC**



CHRISTINA V. MORGAN Vice Chair





RICHARD MOLCHANY Chair, Coordinating Committee

BRENDAN COTTER Chair, Technical Committee

BECKY A. BRADLEY, AICP Secretary, Coordinating Committee + Technical Committee

# ARMANDO MORITZ-CHAPELLIQUEN Treasurer

BECKY A. BRADLEY, AICP Executive Director

### March 2024 Traffic Monitoring Report Memorandum

To: Lehigh Valley Planning Commission Lehigh Valley Transportation Study

From: Brian Hite, Transportation Planner

The Lehigh Valley Planning Commission (LVPC) staff conducts approximately 100 traffic counts per year under contract with the Pennsylvania Department of Transportation. Additionally, PennDOT has installed and maintains several continuous traffic monitoring stations across the Lehigh Valley that are permanent at their location and collect data 24 hours a day all year long.

Since the beginning of the COVID-19 pandemic, in March of 2020, the LVPC staff has been reporting on a monthly basis the fluctuations in traffic volumes as a result of the pandemic and in the past year the recovery back to the "new normal" of traffic volumes at our continuous counters.

The attached graphic illustrates the last Tuesday of the month traffic volumes for overall vehicles as well as a graphic the shows the larger vehicles classified as "trucks". Because automatic vehicle traffic counters have difficulty distinguishing from large pickup trucks and SUVs, these two types of vehicles may be combined into the passenger vehicle category depending on the characteristics. We generally distinguish between passenger vehicles and commercial vehicles by identifying vehicles over 1 ton in license registration as commercial.

In February 2024 there were three continuous traffic counters in operation providing the following data:

- · Route 22 between Airport Road and the Lehigh River Bridge in Hanover Township
  - o 100,947 vehicles with 13,253 of those being trucks
- Interstate 78 between Route 309 and the Lehigh and Northampton County boundary line in Upper Saucon Township and Lower Saucon township:

73,654 vehicles with 22,213 of those being trucks

- Route 309 just North of Coopersburg and South of East Passer Road in Upper Saucon Township
  - o 36,654 vehicles (this location is unable to identify types of vehicles)

The following two continuous counters are currently out of service for maintenance repairs or due to construction of the roadway:

- Route 33 South of Route 248 and North of Newburg Road in Lower Nazareth Township
- Interstate 78 between Route 33 and Morgan Hill Road, the last exit in Pennsylvania East bound in Williams Township

For the March 2024 Traffic Monitoring Report, the LVPC staff is also providing traffic count data recorded in 2023 at select regional traffic count locations of short-term durations utilizing mobile traffic counters conducted by the LVPC staff in coordination with PennDOT, contracted PennDOT vendors. Also included is data provided by the Delaware River Joint Toll Bridge Commission (DRJTBC) and the Pennsylvania Turnpike Commission.

There are different data collection methods and reporting timeframes for data by the various agencies, such of the Pennsylvania Turnpike providing data on a monthly basis, DRJTBC provides yearly data and PennDOT with the LVPC staff providing average annual daily traffic data.

### Average Annual Daily Traffic by the LVPC / PennDOT:

- · Interstate 78 between Adams Road at Route 100 in Upper Macungie Township
  - o 52,361 total vehicles per day (32,753 cars 19,608 trucks)
- Interstate 78 between Route 22 and Route 309 in Upper Macungie Township
  - o 39,528 total vehicles per day (26,653 cars 12,875 trucks)
- Interstate 78 between Route 412 and Route 33 in Lower Saucon Township
  - o 68,815 total vehicles per day (51,246 cars 17,569 trucks)
- Route 33 between the Tatamy exit and Route 191 in Stockertown Borough
  - o 80,583 total vehicles per day (71,168 cars 9,415 trucks)
- Route 378 between 8th Avenue and Schoenersville Road in Bethlehem City
  - 45,081 total vehicles per day (42,991 cars 2,090 trucks)
- Route 222 between Krocks Road and Interstate 78 in Lower Macungie Township
  - o 50,767 total vehicles per day (47, 405 cars 6,362 trucks)

### 2023 Overall Yearly Traffic by the DRJTBC:

- · Interstate 78 Bridge over the Delaware River in Williams Township
  - o 11,010,667 total vehicles (7,771,357 cars 3,239,310 trucks)
- Route 22 Easton Phillipsburg Bridge in Easton City
  - o 5,390,745 total vehicles (5,027,583 cars 363,162 trucks)
- Northampton Street "Free Bridge" in Easton City
  - o 4,998,463 total vehicles (this location is unable to identify types of vehicles)
- Route 611 Portland Columbia Bridge in Portland Borough
  - o 1,348,390 total vehicles (1,248.836 cars 135,554 trucks)

### December 2023 overall traffic by the Pennsylvania Turnpike Commission:

- Interstate 476 (Pennsylvania Turnpike Northeast Extension) in South Whitehall Township
  - o Exiting Interstate 476 to Route 22
    - Ø 548,883 total vehicles (423,734 cars 125,149 trucks)
  - o Entering Interstate 476 from Route 22 and Tilghman Street
    - Ø 560,586 total vehicles (429,241 cars 125,149 trucks)

# THE MORNING CALL

# Talking Business with Becky Bradley: Lehigh Valley businesses can help fight climate change

### By Becky Bradley

For The Morning Call March 10, 2024 at 9:30 AM

Climate change is often referred to on a global scale because it is literally a threat to the health of our planet, but we're seeing the threats to the Lehigh Valley every day. Our summers are hotter, we have more extreme weather events and a region with two major rivers and countless streams is now even more vulnerable to flooding.

But we know we have the power to reduce its effects, helping to save people, property, infrastructure and our economy. What we need now is the collective will of this region's 695,000 people, and another 163,000 neighbors in Carbon and Warren counties, to join in this fight. That's the idea behind the Lehigh Valley's first-ever Priority Climate Action Plan for Transportation Decarbonization.

The Lehigh Valley Planning Commission was awarded \$1 million by the U.S. Environmental Protection Agency under the Climate Pollution Reduction Grant program. Funded by the 2022 Inflation Reduction Act, the program was created to funnel grants to each state and the 67 largest regions in the nation to develop and implement climate action plans to reduce greenhouse gas emissions. Turns out, the Lehigh Valley Metropolitan Statistical Area is the 69th largest region in the nation, but the LVPC lobbied the EPA to be part of the original pool, and despite initially being outside of the largest regions, we filed a letter to participate in the program. When Florida, Kentucky, South Dakota and Iowa did not file letters to participate we moved into the program.

This plan has been a long time coming, as it stands on the shoulders of past regional works such as our 2014 Climate + Energy Element, Livable Landscapes Plans, WalkRollLV and FutureLV.

Under the program, the climate action plan is designed to focus on reducing pollution in a single sector of emissions.

That will be followed by a more wide-ranging Comprehensive Climate Action Plan that would map out actions directed at all sectors and be delivered in the summer of 2025. All of it would be ramping up this region's long-term commitment to bringing down carbon emissions and fighting the effects of climate change.

For the priority climate action plan we delivered to EPA in late February, we chose to focus on the transportation sector, because that's where we can have the most impact. Not only does being in this program give us access to \$4.6 billion in competitive Inflation Reduction Act grants, but through our sister organization, the Lehigh Valley Transportation Study, the region also has access to more than \$140 million in local transportation money in the coming 25 years to advance the policies laid out in our climate action plans.

The greenhouse gas inventory we did in 2022 showed this region emits nearly 10 million metric tons of carbon dioxide equivalent each year – that's 14.6 metric tons for every Lehigh Valley resident.

The plan calls for reducing emissions by increasing our use of alternative fuel vehicles, increasing transit ridership, implementing Walk/RollLV: Active Transportation Plan, using technology to reduce congestion and creating green infrastructure along our busiest highways.

That last one has long been a personal ambition of mine because it allows us to reimagine the sometimes-massive rights-of-way on highways and interchanges along Routes 22, 33, 378 and 309, and the Pennsylvania Turnpike. By planting non-invasive species such as native grasses, wildflowers and trees, we'll not only have carbonsequestering green improvements in the areas where the most emissions are being created, but it will give our busiest throughfares a signature look to greet anyone entering the region. Visitors will have the unmistakable sense that they are entering a green region that is also a working one. Honestly this is our identity. Simultaneously industrious and naturally significant. The green part is what, in survey after survey, residents, visitors and businesses tell us is the highest priority for protection. Green equals quality of life for the majority. Our policies and investments must meet the public's expectation for a green region. This is the heart of the Priority Climate Action Plan and our upcoming request to EPA for around \$120 million to green the heck out of Routes 22, 33, 378 and 309. As we approach St. Patrick's Day, we will work towards requesting these one-time only grant dollars to seed a greener future. Luck or no, we will work towards that pot of gold at the end of the rainbow.

Our projections show that if we meet our goals, we'll reduce our transportation emissions by nearly 300,000 metric tons of carbon dioxide equivalent annually by 2030 and 321,000 annually by 2050.

Our success as a region makes all this more challenging because our population and projections show the Lehigh Valley growing by 100,000 people and 74,000 workers by 2050. The PCAP-induced emissions cuts would be more than twice as large, but the plan will be fighting against the headwinds of more people and more vehicles creating more emissions, even as we work to reduce them. Our growth makes this more important than ever.

All of this will require a collective will — by institutions and individuals — to change our habits, but our public engagement process for this plan was encouraging. More than 160

different people attended one of the eight public workshops we held to craft the plan, and many attended every workshop. They came with passion and ideas. Their dedication was inspiring.

The Inflation Reduction Act and Infrastructure Investment and Jobs Act have presented us with an incredible chance to be a national leader in fighting the impacts of climate change. If we're to leave the coming generations with a region as vibrant and beautiful as we get to experience now, it is the responsibility of all of us to take full advantage of this green opportunity to make climate action our mandate.

Becky Bradley is Executive Director of the Lehigh Valley Planning Commission.





March 2024

# Local Technical Assistance Program (LTAP) Upcoming Virtual Classes

March 22: Drones, Municipal Transportation Uses,

8 am to noon

March 26: Traffic Signals Basics,

8 am to noon

**April 2: Temporary Traffic Control in Work Zones**,

Day 1, 8 am to noon

April 3: Temporary Traffic Control in Work Zones Workshop,

Day 2, 8 am to 10 am

April 4: Manual on Uniform Traffic Control Devices (MUTCD) 11th edition updates,

11 am to noon

April 23: Public Works Safety,

8 am to noon

May 2: Nighttime Visibility for Safety,

11 am to noon

Register at <a href="www.gis.penndot.gov/LTAP/">www.gis.penndot.gov/LTAP/</a> or by contacting Hannah Milagio at <a href="mailto:hmilagio@lvpc.org">hmilagio@lvpc.org</a>
For LTAP Municipal Technical Assistance Requests contact Brian Hite at <a href="mailto:bhite@lvpc.org">bhite@lvpc.org</a>