



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING Tuesday, May 21st, 2024, 12:00 noon AGENDA

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

Roll Call

Courtesy of the Floor

Ordinance/Plan Reviews and Information:

1. *ACTION ITEM:* Whitehall Township and City of Allentown – Land Use of Regional Significance – Riverside Drive (JS, EG)
2. *ACTION ITEM:* Wilson Borough – Land Use of Regional Significance – 1921 Dixie Avenue (JS, BH)
3. *ACTION ITEM:* North Whitehall Township – Land Use of Regional Significance – Nexus 78 (JD, JS, BH)
4. *ACTION ITEM:* Whitehall Township – Subdivision and Land Development Ordinance Amendment – Plan Submission Requirements (JS)

Next Comprehensive Planning Committee Meeting:
June 25, 2024 at 12:00 pm



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

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

May XX, 2024

Lee Rackus, Planning, Zoning & Development Bureau Chief
Whitehall Township
3219 MacArthur Road
Whitehall, PA 18052

Jennifer Gomez, AICP
Director of Planning & Zoning
City of Allentown
435 Hamilton Street
Allentown, PA 18101

**RE: Riverside Drive Raise Grant – Land Use of Regional Significance
City of Allentown
Lehigh County**

Dear Ms. Rackus and Ms. Gomez:

The application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Major Redevelopment 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
 - May 21, 2024 at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - May 23, 2024, at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to construct a new local road and multi-use trail along former railroad right-of-way between Furnace Street in the City of Allentown and Wood Street/Lehigh Avenue in Whitehall Township, approximately 2.3 miles (parcel numbers 640746335876, 640747104161, 640738706988, 640739333753, 640820766814, 640821390309, 640823417857, 640824645120, 640815791987 and 640806671365).

The proposal extends motor vehicle access from Furnace Street to Wood Street, providing connections to the Route 22 interchange at Fullerton Avenue. Connections between Riverside

Drive and both Jordan Drive and Kimmet Avenue are also proposed. The roadway is to be 28 feet wide curb-to-curb for most its length in Whitehall Township, expanding to 36 feet wide at Furnace Street and the Jordan Drive connection in Allentown to accommodate a center left turn lane. The road is to be posted with a 25-mile-per-hour posted speed limit. The proposal extends the completed Phase 1 of the project, which includes the construction of Riverside Drive from Hamilton Street north to Furnace Street.

A 12-foot-wide paved shared use path for walking and bicycling will be constructed parallel to Riverside Drive, and a five-foot wide landscaped buffer with streetlights and street trees will be located between Riverside and the shared use path. 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. The gravel path is also designated as an emergency access road.

The proposal aligns with *FutureLV: The Regional Plan* because it establishes a mixed-transportation corridor and enhances multimodal connections (of Policy 2.1). The project is located in the Development area of the *FutureLV* General Land Use Plan and serves to ‘increase the social, economic and environmental well-being of the region’ (of Policy 1.1) by increasing access to critical needs such as jobs, active recreation opportunities that improve public health, supporting emergency management and safety operations, creating safe routes to schools, parks and community facilities, preserving historical and natural resources and re-establishing neighborhood access to the Lehigh River. Reusing vacant and underutilized properties by redeveloping existing rail right-of-way serves to improve efficiency of existing infrastructure (of Policies 5.4 and 2.2).

In addition, the project closes Pennsylvania’s highest priority trail gap along the Delaware & Lehigh National Heritage Corridor (D&L), is part of the September 11th National Memorial Trail and improves connections to the Lehigh and Northampton Transportation Authority (LANTA) new bus rapid transit network, which serves to ‘connect regional trails to centers, corridors and historic assets’ (of Policy 4.4).

Realizing Community Vision

The project supports the vision outlined in the Whitehall Township Comprehensive Plan, which identifies that ‘The Delaware and Lehigh Trail is a large trail scheme that will eventually connect Wilkes-Barre with Philadelphia via abandoned canal towpaths and rail lines’ (Page 2-16). Closing this gap in the D & L Trail network improves Township resident access to the Township’s existing recreation facilities, including the Ironton Rail Trail.

The project also supports the vision outlined in Allentown Vision 2030, where a north-south proposed trail is identified from south of Union Boulevard to north of Route 22 (Chapter 4 Center Allentown), supporting both Center and East Allentown neighborhoods.

The project is also supported by several regional plans and initiatives, such as the *Lehigh County Livable Landscapes Plan* – with this project entitled ‘Delaware & Lehigh National Heritage Corridor Trail’ – and is listed as one of the Commonwealth’s high priority trail gaps. The corridor’s place as an integral part of the Lehigh Valley’s pedestrian network is further underscored by its inclusion in *WalkRollLV: Active Transportation Plan* among the Top 20 Sidewalk Gaps. The proposal serves to fulfill strategies included in all three plans.

Additionally, in the grant application process when applying for a U.S. Rebuilding American

Infrastructure with Sustainability and Equity (RAISE) Grant for the project, numerous regional entities including the Lehigh Valley Economic Development Corporation, Lehigh Valley Chamber of Commerce, St. Luke's University Health Network, Wildlands Conservancy and others provided letters of support outlining the ways in which the Riverside Drive project supports each organization's goals and missions.

Job Access

1,184 employees working in Whitehall Township commute from the City of Allentown (10.5% of Whitehall Township workers), and 1,749 Township residents commute to the City of Allentown for work (12.4% of Township residents). Providing multimodal transportation options for nearly 3,000 workers traveling back and forth between Whitehall and Allentown serves to increase access to employment opportunities while alleviating vehicular traffic on other connecting roadways, such as MacArthur Road / 7th Street (Route 145).

The proposal will improve the ability for the workforce to get to and from places of employment, increase economic success of the community and region and remove barriers to employment (of Policy 4.3). This phase of the Riverside Drive project provides critical connections to an area with low access to opportunity and serves nearby areas with similar or very low access to opportunity. Implementation of this multimodal corridor will improve job access and mobility for residents – 19% of whom do not have access to a vehicle based upon analysis included in the LVPC Equity Analysis. The transportation options offered through this project will 'increase the social, economic and environmental well-being of the region' (of Policy 1.1), create public spaces in underserved areas and 'ensure transportation accessibility for all persons' (of Policy 5.2).

Traffic and Network Mobility

The construction of Riverside Drive serves to increase safe and accessible transportation options (of Policy 2.1). Currently there are few connections between the City and Township, and those roadways lack sufficient infrastructure to safely accommodate multimodal transportation users alongside motor vehicles. Constructing Riverside Drive resolves these legacy issues and provides 'a safe, well-maintained transportation network to move people and goods efficiently, while capitalizing on existing infrastructure' (Policy 2.2) through a 'right-sized transportation infrastructure project' (of Policy 2.2).

The proposed portion of Riverside Drive increases the mobility of a variety of transportation uses. Riverside Drive creates a connection between several roads, including Hamilton Street, West Court Street, Linden Street, North Front Street, West Gordon Street, West Allen Street, Waterfront Drive, Furnace Street and Jordan Drive in the City of Allentown, as well as Kimmet Avenue and Wood Street in Whitehall Township. The shared-use trail will also connect to Lehigh Avenue, and Riverside Drive also creates a new route to the Route 22 interchange at Fullerton Avenue.

Riverside Drive will also support the traffic generated by new and/or proposed developments in the vicinity, including the Waterfront Development and the Neuweiler Redevelopment:

Waterfront Development

AM Peak – 1,117 Total Trips

PM Peak – 1,919 Total Trips

Neuweiler Development

AM Peak – 182 Total Trips

PM Peak – 252 Total Trips

Four bridges in the vicinity may see increased traffic flows in the future. PennDOT's OneMap software indicates the Route 22 bridge over the Lehigh River is in Good condition, as well as the American Parkway bridge over the Lehigh River. While OneMap indicates the Tilghman Street Bridge as in fair condition, the bridge has recently undergone a multi-year rehabilitation project. Hamilton Street bridge is also identified as Fair condition. Due to the number of estimated trips from the Waterfront and Neuweiler developments, it is important to monitor the effects the new traffic may have on the bridges.

Emergency Management and Response

The creation of Riverside Drive allows for north-south connectivity and increased response rates for police, fire and emergency medical services through improved access. The design of the northernmost portion of the trail extending from Wood Street to Lehigh Avenue also allows for the trail to be used by emergency vehicles. At completion, the corridor will 'promote safe and secure community design and emergency management' (Policy 5.1).

The LVPC commends the inclusion of a redistribution of existing traffic section within the plan. The redistribution shows significant use of the proposed Riverside Drive and how it will positively impact the flow of traffic throughout the site and surrounding areas. With the greater connection, emergency access for the surrounding neighborhoods and Route 22 is also improved.

Multimodal Accessibility

The LVPC commends the paved shared-use path along the length of Riverside Drive, as well as the continuation of the path beyond the end of Riverside Drive. The proposed multi-use trail supports mobility, transportation accessibility, air quality, safety and economic competitiveness, all things that are essential to quality of life for residents and visitors. The LVPC commends the proposal for providing D&L Trail connections that strengthen 'sidewalk, bike route and trail infrastructure' (of Policy 5.3). The proposal invests in the community by promoting a healthy environment through active transportation opportunities.

Lighting is proposed along Riverside Drive and the paved portion of the multi-use trail. The LVPC commends the use of streetlight poles that provide both traffic and pedestrian lighting (of Policy 5.3) as well as banner arms that can be used to identify the corridor and establish a sense of place (of Policy 5.4).

The LVPC also commends the inclusion of enhanced crosswalk markings and Americans with Disabilities Act (ADA)-accessible curb cuts, which increase access to daily needs for all people (Policy 5.2).

Multimodal connectivity in urban settings require ample room for accommodating all modes of transportation. Dedicating a separation of higher speed bicycles and pedestrian traffic will enhance safety along the corridor. The LVPC commends the project vision that includes pavement/trail markings and/or signage to support bicycle use to 'ensure transportation accessibility for all persons' (of Policy 5.2).

The LVPC encourages further considerations to include additional amenities supporting alternative transportation modes along the Riverside Drive trail. Bicycle racks should be included in well-lit locations. Benches should also be considered along the paved portion of the shared-use path to provide resting areas.

Transit Connections

The LVPC supports and encourages continued coordination with the Lehigh and Northampton Transportation Authority (LANTA) as project development continues. LANTA currently provides public transportation near the proposed new portion of Riverside Drive, with northbound/southbound stops along Front Street in Allentown and Fullerton Avenue in Whitehall Township. LANTA does not have immediate service plans along Riverside Drive, but does anticipate expanding service via Riverside Drive between Linden Street in Allentown and Wood Street in Whitehall Township following the completion of the new roadway.

The proposed plan includes ADA curb ramps at the intersections of Furnace Street, Jordan Drive, and Kimmett Street. LANTA appreciates providing access to the crosswalks from the curb ramps. Fully accessible concrete bus stop landing pads at a raised curb height, at each crosswalk and roadway connection, will facilitate proper boarding/alighting at the anticipated northbound and southbound bus stop locations at the three intersections. For continued early engagement and discussion, please contact LANTA Planner/Land Use Specialist Molly Wood at mwood@lantabus-pa.gov.

Maximizing transit and trail connections serves to ‘improve connections between bus stops and pedestrian and bicycle infrastructure’ (of Policy 5.2). Continued coordination with LANTA regarding future bus services needs will ensure that development of the roadway includes pull-off lanes and modern bus shelters, especially as the entire Riverside Drive Multimodal Revitalization Corridor is constructed, to strengthen mixed-transportation access to regional centers (of Policy 2.3).

Short- and Long-Term Funding

A policy of *FutureLV* is to ensure the highest and best use of transportation funds to maximize available financial resources (Policy 2.6). The proposed project is financed by private, state and federal funding, is part of an overall regional transportation project, and is being incrementally funded using best practices and available funding in order to facilitate an efficient construction and implementation schedule.

As a vital emergency management and congestion management corridor, Riverside Drive is anticipated to be eligible for ‘Local Federal Aid Route’, providing additional future maintenance funding opportunities to Whitehall Township and the City of Allentown. This will ensure a legacy of good roadway maintenance and repair, promoting the fiscal health and sustainability of municipalities (Policy 4.6) and providing transportation options that are cost-effective and sustainable (of Policy 1.1).

Stormwater Review

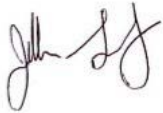
The project site is located within the Catasauqua and Little Lehigh Creek Watersheds. These watersheds have fully implemented Act 167 Stormwater Management Ordinance. Comments related to our review of the project’s stormwater management plan are included as Attachment 1.

Overall, the design of this proposal is exemplary of sustainable transportation investments, fulfilling numerous goals and policies of *FutureLV: The Regional Plan*.

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

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

Sincerely,



Jillian Seitz
Senior Community Planner



Evan Gardi
Transportation Planner

cc:

Christine Frey, Pennsylvania Department of Transportation, Applicant
Chris Stanford, Michael Baker International, Project Engineer
Trestle Redevelopment Partners, Record Property Owner
Frank Clark, Whitehall Township Engineer
David Petrik, City of Allentown Deputy Director of Public Works
Priscilla Reyes, City of Allentown Assistant Planner
Jesse Sadiua, City of Allentown Chief Planner
Brandon Jones, City of Allentown Planner
Rick Molchany, Lehigh County Director of General Services
Molly Wood, LANTA Planner/Land Use Specialist
Garrett Cook, Lehigh County Conservation District
Claire Sadler, Delaware & Lehigh National Heritage Corridor Executive Director
Darlene Heller, City of Bethlehem Planning Director
Kerry Rabold, Salisbury Township Administrative Assistant
Shane Pepe, Emmaus Borough Manager
David Manhardt, South Whitehall Township Director of Community Development
Melissa Wehr, Hanover Township Manager
Glenn Eckhart, Catasauqua Borough Manager
Peter Paone, President, North Catasauqua Borough Council
LeRoy E. Brobst, Manager, Northampton Borough
Tiffany Benson, Coplay Borough Secretary/Treasurer
Randy Cope, North Whitehall Township Manager



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

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

May XX, 2024

Eric Flowers, Manager
Wilson Borough
2040 Hay Terrace
Wilson Borough, PA 18042

**RE: 1921 Dixie Avenue – Land Use of Regional Significance
Wilson Borough
Northampton County**

Dear Mr. Flowers:

The application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Large Residential Development 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
 - May 21, 2024 at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - May 23, 2024, at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes an adaptive reuse of the existing building into 405 apartment units with a separate 3,373-square-foot commercial building for a dog lounge and spa. The proposal is located at 315 South 24th Street (parcel number L9-40-1A).

The property is within an area identified in *FutureLV: The Regional Plan* as a Development Area. Areas designated for Development have infrastructure to accommodate future growth, or redevelopment in the case of the proposed project, and this project serves to ‘increase density of residential and mixed-use development’ (of Policy 1.2).

Environmental Remediation

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 and protect the health, safety and welfare of the public (Policy 3.2).

Cultural Resources

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 proposed 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 (Policy 5.4). It is of note, that the property is likely eligible for listing on the National Register of Historic Places under Criterion A and B, for association with persons and events significant in American history. Any state or federal incentives that the property would receive would need to comply with the National Historic Preservation Act of 1966 and its associated laws. This also, opens an opportunity to receive federal historic tax credits (up to 20% of investment), which can assist in the preservation, reuse and rehabilitation of the site. It is recommended that the developer contact the Pennsylvania Historical and Museums Commission prior to any construction, including removal of windows, relocation of the iconic rooftop Dixie Cup, or any demolition. John Wood, Preservation Services Division Manager, maybe reached at jpwood@pa.gov, (717) 214-8650.

Housing Attainability and Job Access

The proposed development is aligned with efforts supported by the LVPC to ‘encourage reuse of vacant and underutilized properties’ (of Policy 5.4). The Lehigh Valley has a substantial housing shortage, including a 34,000-unit deficit in units priced for higher income levels. The LVPC commends the redevelopment of an existing urban site for new housing opportunities within the community. This development will increase residential density in an existing center and expand housing options near employment areas (of Policy 1.2 and 5.4).

The location of the proposed residential development close to employment areas serves to maximize social and economic opportunities, though this requires a ‘local balance between housing and jobs’ that enables residents to live near where they work (also of Policy 4.5). The LVPC encourages the Borough to work with the developer to explore housing opportunities accessible for a variety of income levels. *FutureLV* advocates for communities to ‘promote mixed-income neighborhoods’, and this location provides an opportunity to ‘expand housing options near employment areas’ (of Policy 4.5). Providing housing 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 (of Policy 2.1).

Landscaping and Outdoor Recreation

The project includes substantial landscaping throughout the site on both the residential redevelopment lot and nearby proposed parking lot. The LVPC commends the proposed landscape islands which help manage stormwater runoff, reduce heat island and climate change impacts, and aesthetically improve the sites by breaking up monotonous expanse of paved parking area (of Policies 3.4 and 5.3).

The site has been intentionally designed to incorporate the existing Wilson Bike Path. A public courtyard/plaza area adjacent to the trail serves to create public spaces that reflect and enhance local culture (of Policy 5.4). A proposed path connects from the Wilson Bike Path to the proposed dog park, which improves access to green spaces (of Policy 5.3). The LVPC recommends the developer consider the potential for a second connection to Wilson Bike Path closer to the northern part of the building to further increase trail access and mobility.

Transportation, Access and Accessibility

An estimated number of trips generated by the redevelopment was calculated using the Institute of Transportation Engineers (ITE) 11th edition Trip Generation Manual. The residential component of the project (Land Use Code 221 – Multifamily Housing) 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. Trip generation estimates are provided to support right-sizing transportation infrastructure projects and to improve network efficiency (of Policy 2.2).

The LVPC reviewed the submitted Transportation Impact Study (TIS) created by Traffic Planning and Design dated February 27, 2024.

Access to the project site will be provided by two driveways along 24th Street. One driveway will be gated to serve the residents of the apartments, and the other will be for the proposed restaurant. An auxiliary parking lot serving the redevelopment is also proposed to the northeast of the project between Washington Boulevard and Lehigh Street, east of 24th Street. This auxiliary area is controlled by one gated full access driveway to Lehigh Street and one gated right-in right-out driveway to Washington Boulevard.

The operation of parking area gates and people who may have access to which parking spaces at various times of day should be specified. Gated access can cause transportation network mobility 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. Proper planning and operation of gated access points are a critical element for the continued mobility of the transportation network (of Policy 2.2).

The parking lots for the project should be prepared for the future of electric-powered and hybrid chargeable cars. It is recommended that the developer construct the essential infrastructure charging stations in the parking lots to accommodate residents who may wish to charge their vehicles, as alternative-fueled vehicles become increasingly prevalent (of Policies 2.2 and 2.5).

The LVPC recommends providing designated spaces near an accessible building entrance to accommodate vehicles for rideshare services, on-demand delivery services and other needs to 'adapt to the contemporary retail economy' (of Policy 4.2).

An additional gated access on the north side of the apartment complex is identified in the TIS as an emergency gated access, however this access driveway is not identified for emergency vehicles only on the plans and should be clarified. Emergency service providers for Wilson Borough should be included in plan review, and emergency access coordinated with those departments, to 'enhance planning and emergency response efforts among emergency management personnel' (of Policy 5.1).

25th Street is identified as a Corridor in the *FutureLV* Transportation plan, connecting the Post War Center of Palmer Center and Palmer Park Mall. Corridors present opportunities for linear mixed-use districts that connect centers with high quality roads, trails and mass transit lines. The location of this project adjacent to 25th Street in proximity to the Wilson Bike Path and transit bus stops provides an excellent opportunity for the Borough to increase multimodal corridor connections in the area.

Sidewalk is provided throughout the site, along parking areas and connecting the building and recreation areas to the external sidewalk network. The LVPC strongly recommends constructing sidewalks along 25th Street property frontage to facilitate multimodal access between businesses northwest and southeast of the site and the Wilson Bike Path trailhead. Aerial imagery and Google Street Views show a sustained history of foot traffic in an unimproved shoulder area of 25th street and the connection to the Wilson Bike Path. Existing sidewalk along

Butler Street to the south terminates at the 25th Street intersection. Providing sidewalk along the 25th Street property frontage would close more than half of the gap between the terminating sidewalk and Wilson Bike Path trailhead and crosswalk. Development proposals should meet the current needs of pedestrians to ensure safe and secure community design (Policy 5.1) and 'ensure transportation accessibility for all persons' (of Policy 5.2).



*Area of frontage of the project site along 25th Street showing worn foot path on shoulder
Google Aerial Imagery and StreetView*

It is recommended that the project incorporate bicycle racks in safe and well-lit locations to further encourage the utilization of the Wilson Bike Path and the connections to other trails and locations from the path (of Policy 5.3).

LANTA provides public transportation directly to the project site, with a northbound bus stop (Bus Stop ID 6628) on 25th Street along the rear frontage of the property, near the intersection

with the Wilson Bike Path. Given the proposed use of the project site for mixed-use and multi-family residential housing, LANTA anticipates growing ridership at this location. LANTA recommends the property owner/developer include an accessible 5-foot by 8-foot bus stop landing pad at the existing bus stop location, with an additional accessible 10-foot by 6-foot concrete pad for a future bus shelter. From here, LANTA recommends an accessible 5-foot pedestrian path connecting the recommended bus stop improvements to the existing Wilson Bike Path. The bike path entrance at the bus stop location can directly lead transit riders and pedestrians to the main site where a full pedestrian network is proposed on the adaptive reuse site.

For follow up, please contact me at mwood@lantabus-pa.gov for continued early engagement and discussion on bus stop details and transit infrastructure.

Ensuring adequate connections between bus stops and pedestrian and bicycle infrastructure is essential to the success and marketability of the proposed project (of Policy 5.2) and is necessary for proper community design and public safety (of Policy 5.3).

Stormwater Review

The project site is located within the Catasauqua and Little Lehigh Creek Watersheds. These watersheds have 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.

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

Sincerely,



Jillian Seitz
Senior Community Planner



Becky A. Bradley, AICP
Executive Director



Brian Hite
Transportation Planner



Joey Dotta
Regional Planner

cc:

Skyline Investment Group Easton LLC, Applicant;

Ryan Veasy, Project Engineer;

Joseph Reibman, Record Property Owner;

Monica Wall, Borough Engineer;

Kent Baird, Palmer Township Planning Director;

Carl Manges, City of Easton Planning Administrator;

Joan Heebner, West Easton Borough Manager;

Molly Wood, LANTA Planner/Land Use Specialist;

Tina Smith, Northampton County Director of Community and Economic Development;

Dion Campbell, Northampton County Conservation District Director



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

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

May XX, 2024

Mr. Randy Cope
North Whitehall Manager
3256 Levans Road
Coplay, PA, 18037

**Re: Nexus 78 – Land Use of Regional Significance
North Whitehall Township
Lehigh County**

Dear Mr. Cope:

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
 - May 21, 2024, at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - May 23, 2024, at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to construct a 547,500-square-foot warehouse at 3121 PA-309 and consolidate four parcels (parcel numbers 546893400322, 547802057486, 547802315657 and 546892310028). 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.

The LVPC offers the following comments and recommendations:

Site Suitability

A portion of the site is located in the Farmland Preservation Area of the *FutureLV* General Land Use Plan, and the entire site is within the Preservation Buffer. Areas within the Preservation Buffer may have factors available to accommodate development, and while these areas are recommended to remain agriculture, additional

scrutiny is warranted in determining the appropriateness of growth. The property is zoned Light Industrial (LI), reflecting the Township’s intent for development to occur in this location. However, the scale of development must be aligned with the context of the surrounding area. The stated intent of the LI District is ‘to meet current and anticipated future regional needs for light industries, offices and limited types of related commercial development’ (Township Zoning Ordinance Section 440-31 D. (11)).

The size of the proposed building, over 500,00 square feet and 50 feet high, greatly surpasses the scale of surrounding developments. The roadways were not built to withstand the impact of tractor-trailers, public sewer and water is not available, and 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, and the site contains High Preservation Priority Natural Resources. 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.

Natural Features

The project site contains a variety of natural features, including woodlands, hydrographic features with riparian buffers, and steep slopes of 15%-25%. 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 resourced, including avoiding developing over the hydrographic features and riparian buffers, to 'maximize preservation of woodlands, critical habitats and natural resources in the land development process' (of Policy 3.1) and ‘protect the quality and quantity of surface water and groundwater’ (of Policy 3.2).

Karst

Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the presence of karsts in the form of surface mines on the site. Human influence can further lead to sinkholes through soil disturbance ([Pennsylvania Department of Environmental Protection](#)).

FutureLV: The Regional Plan discourages development in hazard-prone areas. If this project moves forward, the LVPC urges 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*).

Traffic Impacts / Truck Routing

The LVPC reviewed the submitted Transportation Impact Study prepared by Traffic, Planning and Design, last revised August 28, 2023. Freight land uses can have

profound impacts on the quality and operation of the transportation network. These impacts can be mitigated and improved by proper planning and being proactive during this review part of the project.

Trip generation estimates for the proposal were calculated utilizing the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th edition and Land Use Code (LUC) 150 Warehousing, defined by ITE as “a warehouse is primarily devoted to the storage of materials, but it may also include office and maintenance areas.” The proposed 547,500-square-foot warehouse project is estimated to generate an average of 903 total vehicle trips per day, of which 600 are passenger vehicles and 303 are trucks.

Access of the facility by commercial trucks should be adequately prepared for by formalizing a truck routing plan by the developer, and potentially the operator of the facility, in coordination with the Pennsylvania Department of Transportation (PennDOT) and the municipality to ensure proper truck navigation to serve the site and the best possible routes to Route 22, Route 100, Route 873, Route 33, Interstate 78, and Interstate 476 (PA Turnpike). These routes can help mitigate impact to the community by proper communication of preferred truck routes.

The Lehigh Valley Transportation Study (LVTS), the Metropolitan Planning Organization (MPO), for Lehigh and Northampton Counties, has a Transportation improvement Program (TIP) project along the frontage of the project identified as Project ID 102312 “PA 309 Resurfacing”. The current project and TIP project may have conflicting areas along the frontage of Route 309. Coordination is strongly recommended, if not already occurring, to ensure the impacts of the proposed warehouse and engineering that has already occurred for the Route 309 project may be able to help the warehouse to incorporate mitigation strategies that may help in the safe and efficient movements of freight and people to and from the project, as well as to the community.

The Pennsylvania Turnpike Commission should be informed and coordinated, if needed, with regard to their bridge on State Route 4003 over the Pennsylvania Turnpike, just east of the project location. Coordination and notification in the change of traffic volumes as well as commercial truck traffic utilizing the bridge would enable proper planning for routine maintenance and other activities to better prepare the bridge to accommodate the growth in traffic, including freight vehicles utilizing Orefield Road east of the project (of *FutureLV* Policies 2.2, 2.4 and 2.6).

The right-out configuration of the driveway on Orefield Road and the impacts to turning movements at Route 309 should be studied as the current and proposed improvements to Orefield Road at Route 309 may not be able to accommodate queuing of vehicles turning to proceed southbound on Route 309 from Orefield Road. Appropriate signage should be provided in the location of Route 309 and Orefield Road intersection as to

indicate that commercial vehicles would not be able to access the site from Orefield Road and should utilize the entrance along the frontage Route 309.

It is also of note that Orefield Road becomes Kernville Road west of Route 309. This east west corridor is a key component of community mobility, and it also has a fire department located just west of Route 309 on Kernville Road. The impacts of possible freight vehicle queuing along Orefield and Kernville Roads and the response of volunteers who staff the fire department should be scrutinized as to allow emergency response to not be impacted in the efforts of the fire department. With no dedicated turn lanes on Orefield and Kernville Roads, the queuing of freight vehicles as well as the adjacent Parkland School District, school bus garages located to the south of the project at Orefield Middle School may result in unintended delays of transportation mobility of the intersection already in the phasing engineering and design of the project that may not have been studied in the TIS (of *FutureLV* Policies 1.1 and 2.4).

Site Freight and Emergency Access

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 of employees and visitors. It is recommended that a warehouse entrance or truck entrance ahead sign be erected to communicate to motorists the possibility of trucks turning in contingent on PennDOT approvals.

The gate operations for the high security fenced area should be clarified to enable appropriate access when tractor-trailers need to access the secure location. One guard shack location is shown on the submitted plans, while the other three gate locations do not have a guard shack associated with them. Adequate control of these gates is critical as to not having queuing of freight vehicles in access aisles on site or along roadways in the vicinity of the project.

Gated access is always a concern as far as queuing for tractor-trailers waiting or receiving gate access. There are trailer storage and staging area spaces shown outside of the security area which would enable tractor-trailers to park while waiting for access (of *FutureLV* Policy 2.4).

Truck Parking

The LVPC appreciates the right-sized approach to the staging area parking spaces, by providing the appropriate sizing of seven tractor-trailer staging spaces of 12' x 75' in dimension outside of the security fenced area. **Truck Parking**

The LVPC appreciates the right-sized approach to the staging area parking spaces, by providing the appropriate sizing of seven tractor-trailer 'staging' spaces of 12' x 75' in dimension outside of the security fenced area. It should be made clear whether these spaces are available for tractor-trailer drivers to park overnight long-term making freight

movements would be able to park their long term to comply with federal laws regulating the hours of operation for commercial driver license holders. It should be made clear whether these spaces are available for tractor-trailer drivers to park long-term to comply with federal laws regulating the hours of operation for commercial driver license holders. It is strongly recommended that onsite entry signage be provided to communicate the direction to trucks making deliveries to the facility to get authorization to wait in the provided staging parking spaces. The location of these staging area spaces should also incorporate electric hookup amenities to enable the cab portion and potentially refrigerated trailers to operate on electric power rather than diesel fueled engines, while the truck is parked (of *FutureLV* Policy 2.4).

Snow Removal Law

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 Facility Amenities

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 an area for drivers to plan their day, route themselves to their next destination as well as have restrooms and an appropriate place to eat is strongly recommended. 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).

Air Quality and Congestion Management

It is recommended that parking lots proposed be constructed with the necessary infrastructure to support and integrate electric vehicle charging on site. Electric vehicles are commonplace and most large vehicle manufactures 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 supports addition, of charging as well.

State Route 309 is listed in the Lehigh Valley Transportation Study (LVTS) Congestion Management Process as a current 2017 (from Walbert to Levans Roads) and future 2040 (from Walbert to Route 873) congested corridor. It is recommended that the

developer and municipality engage with PennDOT on strategies to improve congestion along the corridor.

The current TIP project for the Route 309 Resurfacing project may have conflicting areas along the frontage of Route 309, coordination is strongly recommended of the impacts of the proposed warehouse and engineering that has already occurred in may be able to help improve the impacts of the warehouse address mitigation strategies that may help in the safe and efficient movements of freight and people as well as to the community (of *FutureLV Policies 2.2 and 3.2*).

Multimodal Transportation

Route 309 is listed as a corridor connecting the post war centers of Orefield and Schnecksville in the Transportation Plan within *FutureLV: The Regional Plan*. This corridor also contains a “Multimodal Accessibility Buffer”. Post-war Centers were largely developed after the automobile became central to American culture. Designed during and after the inception of the national highway network, they are auto-oriented, generally low-density districts that are difficult to access with anything but a car. Though often near residential neighborhoods and businesses, bicycle, pedestrian and mass transit connections are often limited.

A Multimodal Accessibility boundary along the frontage of the project is an excellent opportunity to incorporate elements of multimodal accessibility transportation options. Coordination with the Lehigh and Northampton Transportation Authority (LANTA) to site or re-site bus stop locations to provide service to employees of the facility.

In the case of this proposal transit service routes are available along Route 309 and should be an important consideration for the development of this employment center and the ability for anyone working there to have access to transportation. It is also recommended that bicycle racks be located at convenient locations near employee entrances to facilitate utilization of alternative to engine powered vehicle modes of transportation (of *FutureLV Policy 5.2*).

It is strongly recommended that sidewalks be provided along the frontage of Route 309 and Orefield Road. It is also recommended that sidewalks also be constructed along both access driveways to the warehouse building itself. 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 cartways of aisles intended for motorized vehicles. The pedestrian connectivity of employee access points to available transit at Route 309 is a critical component to providing fair and equitable transportation options for persons of all abilities (of *FutureLV Policy 5.3*).

Currently, there is proposed limited sidewalks and enhanced crosswalks proposed at Orefield/Kernville Road intersection of Route 309 as part of the TIP Project ID102312 Route 309 Resurfacing, which is a project along the Route 309 corridor from Walbert Avenue to Levans Road. The ability to install sidewalk infrastructure now during the construction of this warehouse would enable future connectivity for multimodal users of

alternative transportation to have the ability to be in a safe and adequate area. Anytime you can remove vulnerable road users from the cartway of roads and put them in pedestrian infrastructure such as sidewalks is a forward thinking planning process (of Policy 5.1).

Lehigh and Northampton Transportation Authority (LANTA)

The Lehigh and Northampton Transportation Authority (LANTA) currently provides public transportation in close proximity to the project site, with an existing northbound bus stop (Bus Stop ID 5975) located on Route 309, nearside of the Orefield Road intersection. There are no sidewalks along the project property frontage on Route 309 or Orefield Road, respectively, nor is there pedestrian connectivity proposed within the project site. Given the proposed warehouse use of the project, LANTA anticipates growing ridership at this location. LANTA recommends the property owner/developer to provide pedestrian improvements from the main entrance of the facility to the main corridors of the project site to access the existing bus stop location.

For follow up, please contact LANTA Planner/Land Use Specialist Molly Wood at mwood@lantabus-pa.gov for continued early engagement and discussion.

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 to help to ‘reduce climate change impacts’ (Policy 3.4).

Stormwater Review

The project site is located within the Jordan 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,



Joseph Dotta
Regional Planner



Jill Seitz
Senior Community Planner



Brian Hite
Transportation Planner

cc:

Barry Henry, Applicant;
Fidel Gonzalez, Project Engineer/Surveyor;
Steve Gitch, North Whitehall Township Engineer;
Dave Manhardt, South Whitehall Township Director of Community Development;
Lee Rackus, Whitehall Township Bureau Chief of Planning, Zoning and Development;
Kal Sostarecz, Upper Macungie Township Director of Community Development;
Jill Seymour, Lowhill Township Municipal Secretary;
Dawn Didra, Heidelberg Township Administrator/Secretary;
Wade Marlatt, Washington Township Manager



DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

May XX, 2024

Lee Rackus, Planning, Zoning & Development Bureau Chief
Whitehall Township
3219 MacArthur Road
Whitehall, PA 18052

**RE: Subdivision and Land Development Ordinance Amendment –
Plan Submission Requirements
Whitehall Township
Lehigh County**

Dear Ms. Rackus:

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
 - May 21, 2024, at 12:00 PM
 - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
 - May 23, 2024, at 7:00 PM
 - <https://lvpc.org/lvpc-meetings>

The application proposes to amend the Township Subdivision and Land Development Ordinance by revising the requirements for submitting sketch, preliminary and final plans, including a requirement that all plans and documents be submitted in a digital or electronic format.

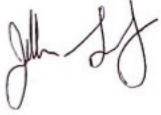
This proposal aligns with *FutureLV: The Regional Plan* because reducing or eliminating the number of required paper plan sets serves to conserve natural resources (Policy 3.1) and demonstrates evolution and adaptability of government by integrating modern technologies (of Policies 1.1 and 1.4). This amendment also improves efficiency in plan review processes and supports the fiscal health and sustainability of both the Township and applicants (Policy 4.6).

Municipalities, when considering Ordinance Amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania

Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jillian Seitz". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Jillian Seitz
Senior Community Planner