



# 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, March 25<sup>th</sup>, 2025, 12:00 noon AGENDA

THE MEETING CAN BE ACCESSED AT <http://www.tinyurl.com/LVPC2025> OR VIA PHONE  
610-477-5793 Conf ID: 651 626 091#.

### Roll Call

### Courtesy of the Floor

### Committee Business

1. *ACTION ITEM:* City of Allentown – Land Use of Regional Significance – Executive Education Academy Charter School Stadium (JD)
2. *ACTION ITEM:* City of Allentown – Community Center Definition (JD)
3. *ACTION ITEM:* Whitehall Township – Setback Dimensions Zoning Ordinance Amendment (JD)
4. *ACTION ITEM:* City of Bethlehem – Rezoning 8<sup>th</sup> Avenue and Martin Court (JS)
5. *ACTION ITEM:* Plainfield Township – Solar Energy Systems (SM, JS)

**Next Comprehensive Planning Committee Meeting:**  
April 22<sup>nd</sup>, 2025, at 12:00 pm



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March xx, 2025

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

**Re: Executive Education Academy Charter School (EEACS) Stadium – Land Use of Regional Significance  
City of Allentown  
Lehigh County**

Dear Ms. Gomez:

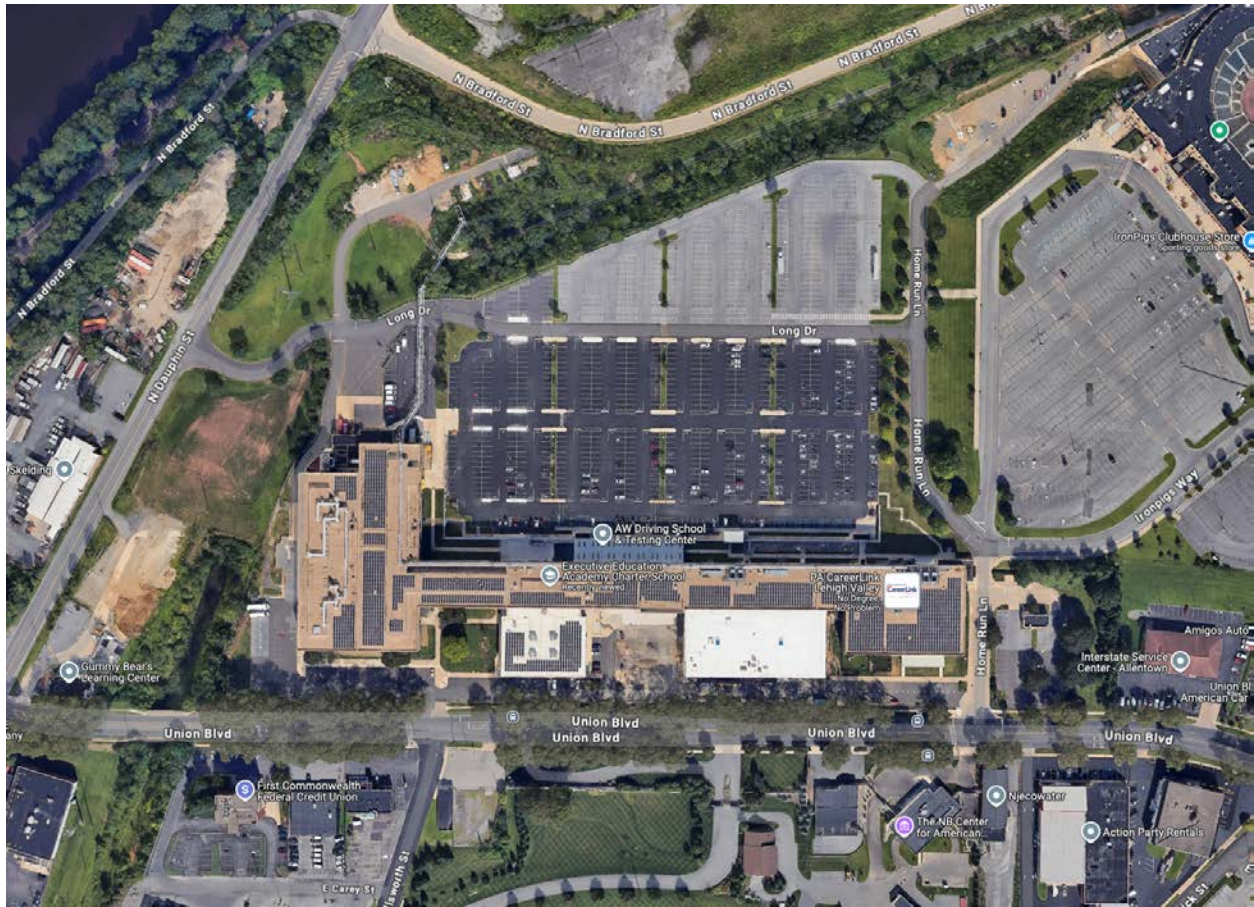
The subject application is considered a Land Use of Regional Significance, as ‘All’ Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 147). The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, per requirements of the Pennsylvania Municipalities Planning Code (MPC). The meetings dates are:

- LVPC Comprehensive Planning Committee Meeting (Virtual)
  - March 25, 2025, at 12:00 PM
  - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting (In Person)
  - March 27, 2025, at 7:00 PM
  - 615 Waterfront Drive, Suite 201, Allentown, PA

The application proposes a 126,713-square-foot multi-sport stadium for Executive Education Academy Charter School (EEACS) at 555 Union Boulevard (Parcel number 640757990536). A 4,912-square-foot addition to the primary building is also proposed to consist of concession and restroom facilities and will connect the stadium to the primary building. The stadium will be elevated by concrete columns and shear walls, a structural element designed to resist lateral forces that prevent buildings from warping or collapsing. A majority of the existing parking will remain below the stadium.

### Background

A proposal for a small storage expansion was previously reviewed by the Lehigh Valley Planning Commission (LVPC) on this site in 2024. The project area features the EEACS main building and accompanying parking areas. The proposed stadium redevelops excess existing parking area.



Google Aerial Imagery

**Site Suitability and Land Use**

The proposal aligns with multiple goals and policies of *FutureLV: The Regional Plan* by reusing and redeveloping areas of the property that already contains the existing education facility (of *FutureLV* Policy 1.1). The project ‘expands access to education and job training’ (of *FutureLV* Policy 4.1) and invests in schools located along corridors (of *FutureLV* Policy 4.3).

Improving the existing facility serves to increase access to recreational opportunities and ‘support cultural and social programs’ (of *FutureLV* Policy 5.2). *FutureLV* ‘encourages local institutions to invest in their surrounding communities’ (of Policy 4.1). The LVPC encourages EEACS to consider opportunities for the general public to access and utilize the facility to create public spaces in underserved areas (of Policies 5.2 and 5.3).

**Transportation**

Students and staff are able to use a variety of transportation modes when traveling to and from the site, including walking and biking, and the Lehigh and Northampton Transportation Authority (LANTA) provides transit service directly to the project site via Union Boulevard (of *FutureLV* Policy 2.3). The proposed sidewalk and crosswalk improvements on Long Drive support pedestrian safety (of *FutureLV* Policy 5.1).

## **Environment**

The LVPC encourages educational institutions to implement environmentally sensitive building and landscape design, such as green roofs or solar panels. This would increase the cost-effectiveness of building operation and further academic endeavors related to these technologies, while enhancing the campus setting, demonstrating environmental leadership within the region, and 'reducing climate change impacts through mitigation and adaptation' (of *FutureLV* Policy 3.4).

The LVPC recommends including landscaped islands within the parking areas to help manage rainwater runoff, reduce heat island effect and visually break up large areas of pavement (of *FutureLV* Policies 3.2, 3.4 and 5.3).

The project site is located within the Catasauqua 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.

Sincerely,



Joseph Dotta  
Regional Planner

cc: Robert Lysek, Applicant; Scott Pasterski, Project Engineer/Surveyor; Executive Education Academy Charter School, Record Property Owner; David Petrik, City of Allentown Deputy Director of Public Works; Jesse Sadiua, City of Allentown Chief Planner; Brandon Jones, City of Allentown Planner; Lillian Bernstein, City of Allentown Assistant Planner.





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Executive Director

March xx, 2025

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

**Re: Community Center Definition – Zoning Ordinance Amendment  
City of Allentown  
Lehigh County**

Dear Ms. Gomez:

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

- LVPC Comprehensive Planning Committee Meeting
  - March 25, 2025, at 12:00 PM
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The proposal makes amendments to Section 660-6 of the City of Allentown Zoning Ordinance to alter the definition for community center to remove the meal service limitation of only senior citizens to all individuals. The petition originates from City of Allentown property owners, RCI Village Properties and Lehigh Conference of Churches.

This proposal aligns with several goals and policies outlined in *FutureLV: The Regional Plan* to improve access to food and daily needs for all people (*FutureLV* Policy 5.2). By removing specific mention of senior citizen, and replacing it with all individuals, it removes the potential ambiguity of those who qualify as senior citizens and supports adaptability of government (of *FutureLV* Policy 1.1).

Municipalities, when considering Zoning 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 that reads "Joseph Dotta". The signature is written in a cursive style with a prominent loop at the end of the last name.

Joseph Dotta  
Regional Planner

cc: Michael P. Hanlon, Applicant.



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Executive Director

March 18, 2025

Mr. Lee Rackus, Bureau Chief Planning, Zoning and Development  
Whitehall Township  
3219 MacArthur Rd  
Whitehall, PA 18052

**Re: Setback Dimensions – Zoning Ordinance Amendment  
Whitehall Township  
Lehigh County**

Dear Mr. Rackus:

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

- LVPC Comprehensive Planning Committee Meeting
  - March 25, 2025, at 12:00 PM
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The proposal makes amendments to the Whitehall Township Zoning Ordinance Chapter 27, Article IX Schedule of Permitted, Accessory, Special Exception and Conditional Uses, Sections 27-75 and 27-76. A reduction in side setbacks is proposed for single-family detached uses in the High Density Residential and High Density Residential Without Apartments (R-5 and R-5A) Districts. While this minor proposal is not a matter of regional concern, the Township updating its zoning ordinance provisions is a best practice for local governments and aligns with *FutureLV: The Regional Plan* (of Policy 1.4).

Municipalities, when considering Zoning 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 that reads "Joseph Dotta". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Joseph Dotta  
Regional Planner





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Executive Director

March 18, 2025

Mr. Tad J. Miller, City Clerk  
City of Bethlehem  
10 E. Church Street  
Bethlehem, PA 18018

**Re: Zoning Map Amendment – 8<sup>th</sup> Avenue and Martin Court  
City of Bethlehem  
Lehigh and Northampton Counties**

Dear Mr. Miller:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting (Virtual)
  - March 25, 2025, at 12:00 PM
  - <https://lvpc.org/meetings.html>
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  - March 27, 2025, at 7:00 PM
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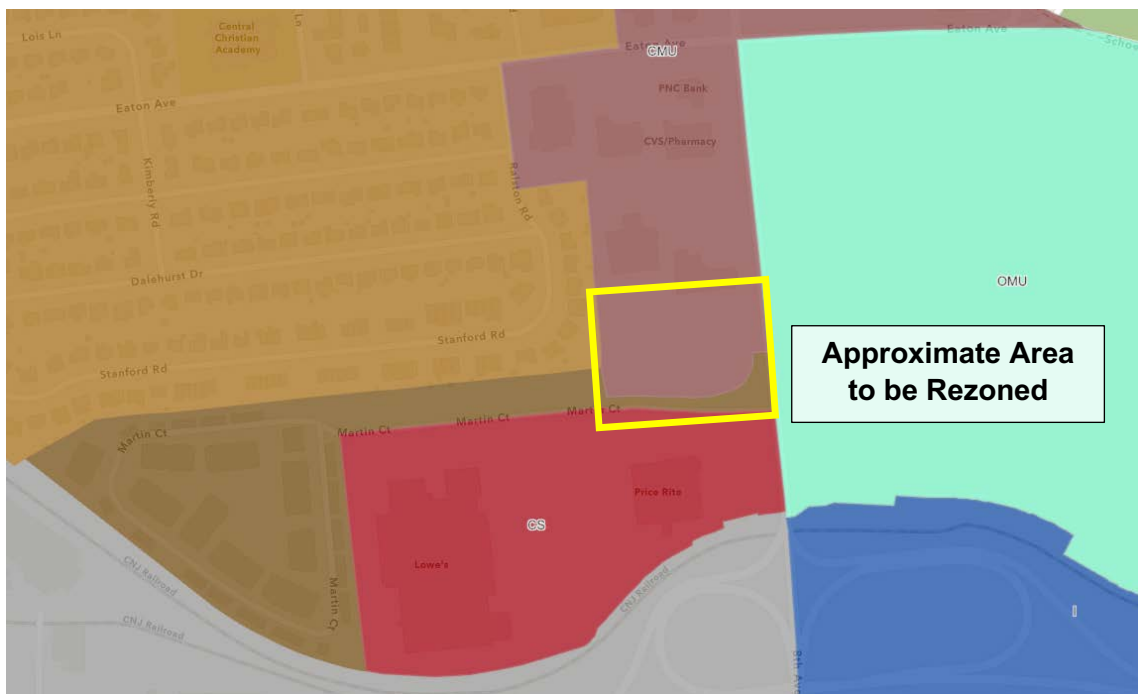
The application, submitted by a private petitioner, proposes to amend the City of Bethlehem Zoning Map by rezoning a four-acre portion of an 11-acre parcel from Mixed Use Commercial Zoning District (CMU) to Shopping Center Zoning District (CS). A small portion of the adjacent parcel is also proposed to be rezoned from High Density Residential Zoning District (RT) to CS District. The parcels are located at the northwest corner of Martin Court and 8<sup>th</sup> Avenue (parcel number 642811698449 and 642811001173).



Google Aerial Imagery

**Background**

The site proposed to be rezoned is currently undeveloped. Existing commercial and medical office developments are to the north and south of the site, and a residential neighborhood is to the west. The former Martin Tower site is to the east, where medical facilities are under construction and commercial and residential uses are anticipated in the future. The area to be rezoned CS is located adjacent to the existing CS Zoning District to the south across Martin Court.



City of Bethlehem Zoning Map

## Site Suitability

Rezoning the site to CS is a logical extension of the existing CS District. The shopping center to the south is accessed via Martin Court, and the project site is physically separated from existing development in the CMU District to the north due to the sloping topography, and retaining walls were constructed to facilitate the existing development. The CS District permits a wider range of commercial land uses that increase opportunities for development of the site. The site's location near access points to Route 22 also supports facilitating development opportunities on the site.

The proposal to rezone the subject properties aligns with *FutureLV: The Regional Plan* by creating new development opportunities in areas where additional development can be accommodated. The project serves to 'match development intensity with sustainable infrastructure capacity' (of *FutureLV* Policy 1.1) and increases social and economic access to daily needs for all people (of Policies 4.5, 4.6 and 5.2).

The LVPC strongly recommends requiring a subdivision of the primary property and a lot line adjustment with the adjacent parcel to avoid split zoning. Determining property lines should occur prior to approving a zoning district change. Ensuring that parcel boundaries conform to individual zoning districts is a best practice in efficient land use regulation and better supports the land development process, administering the City Zoning Ordinance in the future, and supports a clear and consistent property tax assessment process (of Policy 1.4).

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted per the requirements of the MPC, and feel free to reach out if there are any questions about this review.

Sincerely,



Jill Seitz

Chief Community and Regional Planner

cc: Bettina Bubba, Assistant City Clerk



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Executive Director

March 21, 2025

Mr. David Backenstoe, Solicitor  
Plainfield Township  
148 Main Street  
Hellertown, PA 18055

**Re: Zoning and Subdivision and Land Development Ordinance Amendments  
Solar Energy Systems  
Plainfield Township, Northampton County**

Dear Mr. Backenstoe:

The Lehigh Valley Planning Commission (LVPC) will consider the above referenced amendment to Plainfield Township’s Zoning and Subdivision and Land Development Ordinances at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on items largely happens during the Committee meeting. The meetings are being held on:

- LVPC Comprehensive Planning Committee Meeting (Virtual)
  - March 25, 2025, at 12:00 PM
  - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting (In Person)
  - March 27, 2025, at 7:00 PM
  - 615 Waterfront Drive, Suite 201, Allentown, PA

The Township proposes to amend Chapter 27 entitled “Zoning” and Chapter 22 entitled “Subdivision and Land Development” of the Code of Ordinances of Plainfield Township to establish regulations for roof and ground array installations of solar energy systems and provide land development review when a principal solar energy production facility is proposed.

The proposed ordinance amendment includes definitions of two types of solar energy systems: “Accessory Solar Energy Systems” and “Principal Solar Energy Production Facility”. The amendment provides that “Accessory Solar Energy Systems” be permitted as an accessory use in all zoning districts of the Township. These systems are defined as a solar collection system of one or more roof and/ground mounted solar collection devices and related equipment which has a rated capacity of less than or equal to twenty-eight kilowatts (for electricity) or that has a lot coverage collector area of less than or equal to one thousand (1,000) square feet and intended to primarily reduce and/or supplement on site consumption of utility power.

The proposed ordinance defines a Principal Solar Energy Production Facility as an area of land or other area used for a solar collection system that is principally used to capture solar energy

and convert it to electrical energy. The proposal specifies that Principal Solar Energy Production Facilities are systems which use solar related equipment, and which have a rated capacity of more than twenty-eight (28) kilowatts or that has a lot coverage collector area of more than one thousand (1,000) square feet. The proposed amendment adds “Principal Solar Energy Production Facility” as a special exception use only in the Farm and Forest Zoning District.

Utility Scale Solar Energy Systems have been expanding across the U.S. and in Pennsylvania. While solar energy provides a benefit to communities, the interest to locate Utility Scale Solar Energy Systems in rural areas also poses adverse impacts on active agricultural operations and community open space goals. The LVPC is supportive of the Township in proactively regulating Utility-Scale Solar Energy Systems. Aspects of the Township’s proposed ordinance align with *FutureLV: The Regional Plan*, and the LVPC and offers the following recommendations to further improve upon the proposal:

### **Solar Energy System Land Use Definitions**

The proposed system size requirements for Accessory Solar Energy Systems (Sections 4.1 and 4.8 (Definitions)) may result in being overly restrictive for those only intending to use the system to reduce or supplement on-site consumption of utility power. The LVPC recommends modifying this requirement to allow for flexibility related to incidental excess electric power for roof or ground mounted systems that are used primarily for on-site use<sup>i</sup> to support renewable energy and diversification of sources (of *FutureLV* Policy 3.4).

The Penn State Marcellus Center for Outreach and Research developed a ‘Municipal Officials’ Guide to Grid-Scale Solar Development in Pennsylvania’<sup>ii</sup>. This comprehensive series of guidance documents serve as a resource and best practice for municipalities when regulating grid-scale solar energy systems development. A differentiating factor between Accessory Solar Energy Systems and Principal Solar Energy Systems is generally that Accessory Systems are primarily utilized on-site while Principal Systems generate energy to be fed directly into the power grid and used elsewhere. The LVPC recommends revising the ‘Principal Solar Energy Production Facility’ use to refer to ‘Grid-Scale Solar Energy Systems’ or ‘Utility-Scale Solar Energy Systems’, such as by including those terms as a reference within the definition of ‘Principal Solar Energy Production Facility’ to align with the industry’s common terminology and clarify the land use for potential applicants.

### **Solar Energy System Provisions**

The LVPC recommends evaluating the need for the proposed roof mounted solar energy system provisions applicable to Principal Solar Energy Production Facilities (Section 27:317.5.AAAA.4). While the Township’s proposed definition states that Principal Solar Energy Production Facilities can apply to “an area of land or other area”, rooftop mounting implies another principal use active on the site, with solar arrays providing energy directly to the building. Additionally, the provisions for Principal Solar Energy Production Facilities mounted on rooftops, such as limiting visibility within 500 feet of the installation, are not present for roof-mounted Accessory Solar Energy Systems.

The proposed ordinance requires that any glare from a solar panel shall be directed away from an adjoining property (Section 27:317.5. AAAA.4. D.1). To support safe transportation movements, the LVPC recommends adding that systems shall be designed and installed in a matter as to not project any glare onto adjoining roadways as well (of *FutureLV* Policy 2.1). The Township can add language requiring that anti-reflective surface materials or coatings be used,

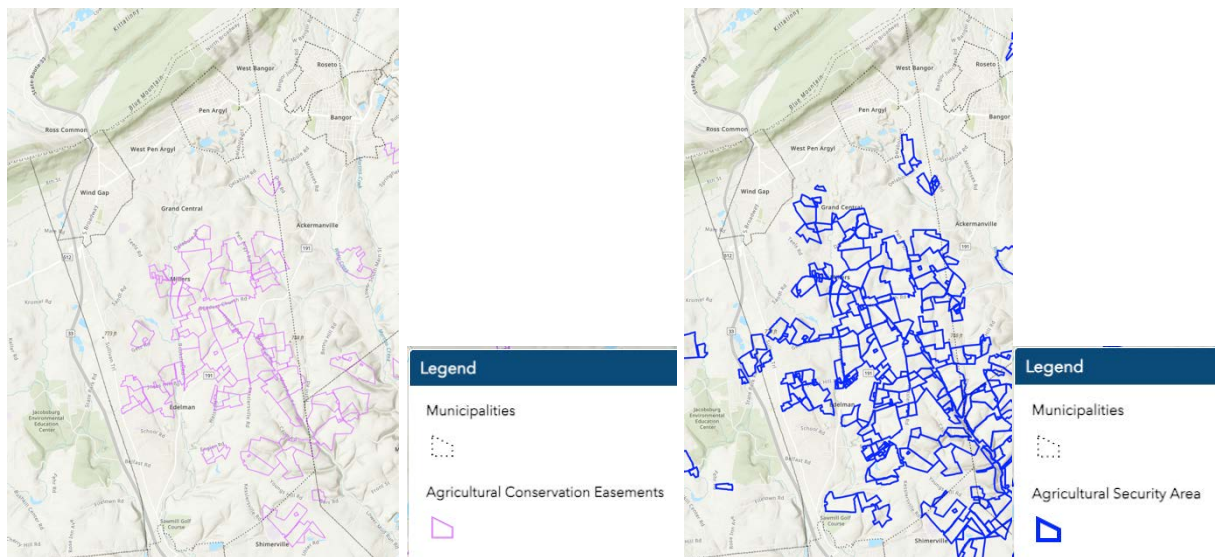


and could require that developers prepare a glint and glare study if there are concerns about specific projects and locations.

### Zoning For Utility Scale Solar Energy Systems

The proposed ordinance adds Principal Solar Energy Production Facility as a special exception use in the Township’s Farm & Forest Zoning District. The purpose of the Farm & Forest District, as specified in the Township’s Zoning Ordinance, is to ‘encourage the continuation of farming, a rural-farm setting, forested areas, limited development, and an attractive rural residential living environment for single-family homes on relatively large lots’ (Section 27-305).

Although Principal Solar Energy Production Facility is being permitted as a special exception, special exception uses are still permitted uses when a project meets established criteria and reasonable safeguards. The Township must take extreme care when determining where to allow Utility Scale Solar Energy Systems. A study by the Center for Rural Pennsylvania<sup>iii</sup> identified that, although Utility Scale Solar Facilities often come in the form of a lease and can be removed in the future, Solar Facility installation can degrade soil quality and sites may not be returned to farmland conditions. Scattered develops may also fragment contiguous farmland areas, making agricultural operations less efficient. The Farm & Forest Zoning District contains numerous contiguous properties that have Agricultural Conservation Easements and Agricultural Security Areas:



LVPC GIS Mapping

If strategically planning and regulated, adverse impacts of Utility Scale Solar Energy Systems can be mitigated and align with *FutureLV* by providing community benefits, including new revenue streams for farmers (of *FutureLV* Policy 4.4) and alternative energy sources (of *FutureLV* Policy 3.4). To align Utility Scale Solar Energy Systems with the Township’s farmland and open space conservation goals and to minimize impacts to farmers, the LVPC recommends prohibiting placement of Solar Energy Systems on agricultural lands classified as “prime” or in areas with agricultural conservation easements. The Township should also connect landowners with Penn State Extension information materials<sup>iv</sup> on landowner leasing for Utility Scale Solar Farms to support increased understanding when considering entering into a lease.



**Subdivision and Land Development Ordinance Amendments**

The application proposed to amend the Township Subdivision and Land Development Ordinance to provide land development review when a principal solar energy production facility is proposed. The LVPC recommends the Township require applicants to obtain an NPDES permit when Principal Solar Energy Production Facilities result in one acre or more of disturbance pursuant to 25 Pa. Code § 102.5(a). The LVPC also recommends cross-referencing required stormwater management runoff measures per the Plainfield Township Act 167 Stormwater Management Ordinance (Chapter 23).

**Minor Ordinance Recommendations**

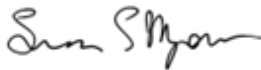
The LVPC notes an error in reference to Section 8 of the Zoning Ordinance (Special Exception Uses) – The Section to be added should be enumerated 27:317.5. AAAA.

Within the Subdivision and Land Development Ordinance Section 9.A.3, the first sentence should be corrected to read “The solar electric facility shall be constructed in compliance with....”.

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted per the requirements of the MPC.

Please let us know if you have any additional questions.

Sincerely,



Susan Myerov, AICP  
Director of Environmental Planning



Denjam Khadka  
Sr. Civil/ Environmental Engineer



Jill Seitz  
Chief Community and Regional Planner

cc: Amy Kahler, Administrative Assistant/Township Secretary; Paige Stefanelli, Plainfield Township Manager.

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## REFERENCES

- <sup>i</sup> For example, Lower Mt. Bethel Zoning ordinance defines “incidental” excess electric power of not more than 120% of the rated capacity in kilowatts of the systems using energy on the subject property, nor more that 120% of the maximum energy demand reasonably anticipated on any given day on that property.
- <sup>ii</sup> Penn State Marcellus Center for Outreach and Research Municipal Officials’ Guide to Grid-Scale Solar Development in Pennsylvania: <https://marcellus.psu.edu/solar-energy/>
- <sup>iii</sup>Center for Rural Pennsylvania Study on Solar Development Impact on Farmland: [https://www.rural.pa.gov/download.cfm?file=Resources%2Freports%2Fassets%2F262%2FImpact+of+Solar+Development+on+Pennsylvania+Farmland+Report+Web.pdf&utm\\_source=chatgpt.com](https://www.rural.pa.gov/download.cfm?file=Resources%2Freports%2Fassets%2F262%2FImpact+of+Solar+Development+on+Pennsylvania+Farmland+Report+Web.pdf&utm_source=chatgpt.com)
- <sup>iv</sup> Penn State Extension Leasing Resources for Landowners: <https://extension.psu.edu/landowner-leasing-for-utility-scale-solar-farms>