



Lehigh Valley Planning Commission

STEVEN GLICKMAN
Chair

CHRISTOPHER AMATO
Vice Chair

KEVIN SCHMIDT
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

ENVIRONMENT COMMITTEE MEETING Tuesday, February 22nd, 2022, at 11:00 am AGENDA

THE MEETING CAN BE ACCESSED AT <https://tinyurl.com/ENV2022mtgs> OR VIA PHONE
610-477-5793 Conf ID: 579 141 820#

Roll Call

Committee Business:

1. *INFORMATION ITEM*: PA Department of Environmental Protection Public Hearing – 303 Demi Road + RPL East Planned Industrial Park (GR)
2. *PRESENTATION ITEM*: Utility Scale Solar, Pamela Adams, Sustainability Planner, Centre Regional Planning Agency (BB, GR, SR)

Communications:

1. *INFORMATION ITEM*: Morning Call Business Cycle Column (MA)
 - a. Yes, We're Facing Huge Development Pressure. No, We're Not sitting Idle.
2. *INFORMATION ITEM*: Monthly, Plan Lehigh Valley Talk Show on WDIY, Lehigh Valley Public Radio, 88.1 (MA)
 - a. February 7 – Draft 2023-2026 Transportation Improvement Program with Mike Rebert, Pennsylvania Department of Transportation District 5-0 Executive
 - b. Next Show, March 7 – BuildLV 2021 Development Report

Engagement and Participation:

1. *INFORMATION ITEM*: 2022 Lehigh Valley Government Academy
 - a. Municipal Planning Education Institute Courses (MA)
 - b. Zoning Administration – April
 - a. Mondays – April 4th, 11th and 18th
 - c. Subdivision and Land Development – May
 - a. Tuesdays – May 3rd, 10th and 17th
 - d. Community Planning – September
 - a. Wednesdays – Sept 7th, 14th and 21st
 - e. Zoning – October
 - a. Thursdays – Oct 6th, 13th and 20th
 - f. Local Technical Assistance Programs (MA)
 - a. Mar. 1: Road Safety Audit, 8 am to noon
 - b. Mar. 3: Incorporating Stormwater Improvements into PennDOT Projects, 11 am to noon.

- c. Mar. 8: Roadside Safety Features, 8 am to noon
- d. Mar. 15: Equipment and Worker Safety, 8 am to noon
- e. Mar. 22: Erosion and Sediment Control, 8 am to noon

Register for classes on the LTAP website gis.penndot.gov/ltap/ call 800-FOR-LTAP or call Brian Hite at 610-264-4544.

Next Environment Planning Committee Meeting:
March 24, 2022 at 11:00 am via Microsoft Teams



Lehigh Valley Planning Commission

STEVEN GLICKMAN
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BECKY A. BRADLEY, AICP
Executive Director

February 16, 2022

Ms. Colleen Connolly
Community Relations Coordinator
PA Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre PA 18701-1915

**Re: NPDES Public Hearing February 2, 2022
303 Demi Road Warehouse and River Pointe Logistics Center
Public Comments**

Dear Ms. Connolly:

Thank you for the opportunity to comment on the proposed 303 Demi Road Warehouse and River Pointe Logistics Center in Upper Mount Bethel Township, Northampton County. These projects are potentially transformational for the township, the surrounding region, including Portland Borough and the entire Slate Belt and Northampton County. Such development can produce a wide range of impacts regarding community character, infrastructure, environment, economy and quality of life. The Lehigh Valley Planning Commission (LVPC) has completed a review of the 303 Demi Road Warehouse proposal relative to *FutureLV: The Regional Plan* and provided comments to Upper Mount Bethel Township by letter of May 28, 2021. The subject application as presented was found to be generally inconsistent with *FutureLV: The Regional Plan*. The letter provides an in-depth review of the proposal relative to the goals, policies and actions of the plan and the associated land use recommendations. Issues covered include sewer capacity, transportation network impacts, intersection improvements, bridge development, site access and emergency access, tractor-trailer accommodations, job access and multimodal transportation, landscaping and sustainability, and environmental impacts and stormwater. We offered additional comments regarding stormwater management on the site by letter of October 29, 2021. Both letters are attached to this letter for reference. Key recommendations from the land development review include:

- The LVPC urges the developer and Township to coordinate with Portland Borough to further explore possibilities to serve this area with public sewer.
- The LVPC strongly urges the developer to perform traffic counts along Demi Road and River Road to assess the impact of freight-based businesses on the entire regional transportation system.
- It is strongly recommended that the Township request a concurrent review of this proposal by PennDOT District 5 to coordinate infrastructure investments and promote the fiscal health and sustainability of municipalities.
- The LVPC urges the developer to directly coordinate with PennDOT and the Township regarding future bridge projects.

Ms. Colleen Connolly
PA Department of Environmental Protection
February 16, 2022
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- It is imperative that the Township consider all economic implications this proposal poses to the infrastructure system, economy, tax base, environment and community.
- The LVPC strongly recommends that the applicant consider incorporating sustainable systems and green building design into the facility.
- The LVPC strongly recommends that the Township ensure any impacts to the environment generated by the development are scrutinized to minimize environmental impacts of development.

The 800-acre River Point Logistics Center project has not been reviewed for subdivision and land development by the LVPC. The overall scale of that proposal obviously magnifies all the concerns expressed for the 303 Demi Road Warehouse. A specific concern of the LVPC is to ensure that the overall impacts of the 800-acre development are considered together and not as a piecemeal approach in many individual parcels or phases. As such, it is critical for the LVPC to see a complete project up front including all potential phases with technical documentation of impacts, including traffic, freight movement, sewer and water facilities, emergency access, multimodal transportation accommodations, environmental impacts and stormwater management, among others. For stormwater management, we request to be notified when an NPDES permit application is filed with the Department or the Northampton County Conservation District.

Again, we appreciate the opportunity to comment on the NPDES permit for the above proposals. Please contact me, Geoff Reese at 610-264-4544 or greese@lvpc.org with any questions related to these comments.

Sincerely,



Geoffrey A. Reese, PE
Director of Environmental Planning



GREG ZEBROWSKI
Chair

STEVEN GLICKMAN
Vice Chair

PAMELA PEARSON
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

May 28, 2021

Mr. Robert Teel, Chair
Upper Mount Bethel Township Planning Commission
387 Ye Olde Highway
Mount Bethel, Pennsylvania 18343

**RE: 303 Demi Road Planned Industrial Park – Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County**

Dear Mr. Teel:

The Lehigh Valley Planning Commission (LVPC) considered the subject proposal at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings were virtual and occurred on:

- LVPC Comprehensive Planning Committee Meeting
 - May 25, 2021 at 12:00 PM
- LVPC Full Commission Meeting
 - May 27, 2021 at 7:00 PM

The subject 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’ land use category. The project proposes a 420,000-square-foot logistics center and associated site improvements at 303 Demi Road (parcel numbers C11 26 12 0131, C11 26 11 0313, C11 26 10A 0131, C11 26 10B 0131, and C11 26 8 0131).

The subject application is located at the terminating point of Demi Road, accessible via River Road. The project site is located adjacent to the southeast border of Portland Borough and approximately one quarter of a mile away from PA Route 611, connecting south to Route 512 and the Lehigh Valley and the Portland-Columbia Toll Bridge, connecting north into New Jersey.

The proposed project, while strategically located, is pivotal to the long-term viability of the Township and poses substantial impacts to Township character, infrastructure and quality of life if left unmitigated. The project site is located in the Development Area and Preservation Buffer of the General Land Use Plan and has the potential to be consistent with *FutureLV: The Regional Plan*. However, the project location is not within an area with available or planned transportation capacity. The Township is discouraged from approving land development plans that have freight impacts, without the existing infrastructure to support it (of Policy 2.4). Additionally, the subject application as presented is proposed to be served by on-lot sewer utilities, eliminating the possibility that this development and any future developments in the vicinity may be used for manufacturing. The long-term success and viability of this proposed

building and the future River Pointe Industrial Park is reliant upon the inclusion of a mix of industrial uses for ‘continued diversification of the regional economy to strengthen economic resilience’ (Policy 4.2).

These critical infrastructure components must be accounted for in order to meet the needs of the developer, Township and Lehigh Valley, and for these reasons the subject application as presented is generally inconsistent with *FutureLV*. The LVPC offers the following comments and considerations to ‘strengthen freight mobility to minimize quality of life impacts to residents’ (Policy 2.4) and improve the long-term success of the proposal, while promoting the fiscal health and sustainability of the Township (Policy 4.6):

Sewer Capacity

The availability of sewer capacity is a critical infrastructure component that will determine the success of this proposal in the long-term. While on-lot sewer systems may be adequate to service the operations of a single warehousing development, public sewer is much more appropriate to accommodate the scale of the proposal and any developments anticipated for this area in the near future, especially if the intent is to accommodate various forms of industrial uses. Public sewer is absolutely necessary to support manufacturing uses to ‘minimize the environmental impacts of development’ (Policy 3.2) when disposing of wastewater generated from the manufacturing process.

The LVPC urges the developer and Township to coordinate with Portland Borough to further explore possibilities to serve this area with public sewer. In consideration of the possibility that public sewer will be extended to this site in the future, the LVPC recommends incorporating the necessary infrastructure to support public sewer connectivity at the time of land development. These recommendations facilitate ‘matching development intensity with sustainable infrastructure capacity’ (of Policy 1.1).

Transportation Network Impacts

A transportation impact study (TIS) and transportation impact assessment (TIA) were submitted with the proposal. The TIS accounts for traffic impacts of the larger industrial park, River Pointe Logistics Center, with development to be proposed at a later date, and the submitted TIA has been provided to account specifically for the subject application.

The proposal is anticipated to generate an average of 731 trips per day, of which 252 are truck trips. These truck trips more than double the current average of 530 daily trips generated by the two existing facilities on Demi Road, resulting in 1,261 vehicles that will be utilizing Demi Road and River Road (State Route 001Z) on a daily basis if this project is completed. Estimated traffic counts were generated using the Institute of Transportation Engineers (ITE) Trip Generation Manual. However, the information provided within the TIA is insufficient to accurately assess the transportation impacts of the proposal on the local and regional transportation network. Traffic counts along Demi Road were not included in the TIA, omitting context for existing and future conditions. The LVPC strongly urges the developer to perform traffic counts along Demi Road and River Road to ‘assess the impact of freight-based businesses on the entire regional transportation system (of Policy 2.4). Assessments are a critical component of planning and preparing for the increased usage of these roadways.

Intersection Improvements

The intersection of Demi Road and River Road is located within the Borough of Portland, and is the only way to access the project site. This segment of River Road is under PennDOT ownership and is designated as State Route 1039. It is strongly recommended that the Township request a concurrent review of this proposal by PennDOT District 5 to coordinate infrastructure investments and ‘promote the fiscal health and sustainability of municipalities’ (Policy 4.6).

The omission of analysis at the River Road and Demi Road intersection inhibits understanding of real transportation impacts resulting from the proposal. Assessment of this intersection is crucial to determine what safety, geometry or layout improvements can be implemented in anticipation of traffic doubling on Demi Road. Currently, there is a convex mirror positioned at the intersection to assist drivers in seeing vehicles approaching from under the train overpass, located 200 feet to the northwest. Reliance on the mirror to safely access River Road from Demi Road does not provide for a safe, well-maintained transportation network (Policy 2.2). Should these areas not be accounted for in the project TIS, the study and any subsequent studies would be inadequate and misleading.



Bridge Development

The Pennsylvania Department of Transportation (PennDOT) has two bridge projects identified for future development along River Road:

- MPMS #85938 – State Route 1039 (River Road) - Local Road State Route 001Z, Bridge Number 28702 over a tributary of Delaware River – Upper Mount Bethel Township Bridge Rehabilitation (Transportation Improvement Program – Future Development)
- MPMS #85937 – State Route 1039 (River Road) - Local Road State Route 001Z, Bridge Number 28701 over a tributary of Delaware River – Upper Mount Bethel Township Bridge Rehabilitation/Replacement (Transportation Improvement Program – Future Development)

The significant size of the overall River Pointe Logistics Center, including the subject ‘303 Demi Road Planned Industrial Park’, may warrant a change in the scope and design of these two bridge projects to accommodate increased vehicular traffic. The LVPC urges the

developer to directly coordinate with PennDOT and the Township regarding these future bridge projects.

Site Access and Emergency Access

The proposed site layout includes an approximately 2,100-foot access driveway, connecting the current cul-de-sac terminus of Demi Road to the employee parking lot and truck loading dock area. The access driveway design poses safety and maintenance concerns with no other available access points to the building. Should an incident occur along the access driveway, or when maintenance of the driveway or utilities occurs, vehicles would be trapped on site until resolved. Emergency response access will also be detrimentally hindered. Rotation of the building layout 180 degrees would significantly improve internal and external traffic circulation by placing the employee parking lot closest to Demi Road.

The overall River Pointe Logistics Center plan included in the TIS indicates a series of buildings for future development in proximity to the subject application, however access to the larger campus is not provided for on the submitted site plan. To ‘encourage an interconnected street network’ (of Policy 2.2), the developer should examine opportunities to connect the proposed development with the developments indicated in the TIS report. The PennDOT Access Management Handbook is a valuable tool for such analysis and can be accessed at: <https://www.dot.state.pa.us/public/PubsForms/Publications/PUB%20574.pdf>

A 20-foot-wide emergency access lane is provided adjacent to the proposed building. The design of the emergency access is inadequate and requires firefighters to stage equipment too close to the building. To ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1), the developer should coordinate the emergency access configuration with Upper Mount Bethel Township emergency services departments and providers.

Tractor-Trailer Accommodations

The proposal does not address amenities or provisions for staging, queuing or parking tractor-trailers. The LVPC recommends ensuring adequate on-site tractor-trailer staging and parking areas to ‘expand truck parking options and amenities’ (of Policy 2.4). Truck and driver amenities should be included, such as long-duration and overnight parking opportunities, driver lounges with bathrooms, showers, food services and sleeping areas. They should also include electrical hookups for tractor-trailers to accommodate refrigerated units and to limit tractor-trailer idling for emission reduction and improved air quality.

The accumulation of snow and ice on top of tractor-trailers poses a safety hazard to other vehicles on the roadway, potentially resulting in serious injury and death. The 2006 Pennsylvania Snow/Ice Removal Law requires the removal of snow and ice from all vehicles prior to leaving the site. The LVPC recommends the installation of a snow-clearing tool at the site that would easily allow for truck drivers to clean off tractor-trailers to help ‘provide a safe, well-maintained transportation network’ (Policy 2.2).

Job Access and Multimodal Transportation

The current proposal anticipates 145 employees on-site per shift, and the TIS identifies a total of 4,038 workers will ultimately be employed in the River Pointe Logistics Center

park/campus. The significant size of the overall park poses potential traffic conflicts if employees at the various sites have the same shift times. Staggered work hours would help to mitigate impacts of arrivals and departures to ease congestion on the road network. Traffic impacts would further be mitigated if multimodal transportation options were available, however the proposal, as submitted, lacks pedestrian infrastructure and other critical multimodal amenities. River Pointe Logistics Center offers the Township and Slate Belt region a pivotal opportunity to serve as a leader in demonstrating the success that can be gained from providing robust pedestrian and bicycle infrastructure in an industrial park.

To 'promote safe and secure community design' (Policy 5.1) the LVPC urges substantial improvements to the site design by incorporating pedestrian facilities that access not only parking spaces and building entrances, but also the external pedestrian network. Sidewalks should be incorporated into the site design, connecting parking areas to current and future proposed buildings, along access drives and along property frontages. Incorporation of multimodal infrastructure along River Road, while limited due to roadway width, should be considered and coordinated between the developer, Township, PennDOT and LVPC/LVTS. Opportunities should be explored to connect the project site to the Portland Park & Ride lot, located just north of the overpass.

The Lehigh and Northampton Transportation Authority (LANTA) does not provide fixed-route transit service to the project site and vicinity. The nearest LANTA fixed-route service terminates in Bangor Borough, approximately eight miles west of Demi Road. LANTA does not have plans to extend fixed-route service to the area. However, the proposal is located within the Slate Belt LANTaFlex Zone, a reservation-based, curb-to-curb, shared ride service provided by LANTA that serves destinations within the zone. More information on LANTaFlex service is available at: <http://www.lantabus.com/routes-and-schedules/route-502-slate-belt-flex/>.

Transit service is key to employment in the Lehigh Valley by playing a critical role in the ability for the workforce to travel to and from work. Transit also affects the marketability and occupancy associated with the development. Incorporating infrastructure that accommodates multiple modes of transportation, and facilitates use of LANTaFlex, is essential to the economic success of this development, and to remove barriers to employment (of Policy 4.3). It is imperative that the Township consider all economic implications this proposal poses to 'the infrastructure system, economy, tax base, environment and community' (of Policy 2.4).

Further, the project is located in proximity to multiple proposed and conceptual trails that contain opportunities to strengthen future job accessibility. The Northampton County Northern Tier Trail is proposed to run from the Lehigh River at Walnutport Borough to the Delaware River at Portland Borough, with a potential alignment along Route 611. The Liberty-Water Gap Trail Extension is proposed to complete the final section of the trail from Liberty State Park in New Jersey into Pennsylvania from Portland Borough to the Delaware Water Gap along Route 611. Consideration should be given to opportunities for implementing this conceptual trail when determining and planning for roadway improvements in order to 'integrate mixed-transportation into public space design' (of Policy 5.2).

Landscaping and Sustainability

The LVPC commends the inclusion of perimeter landscaping, as well as internal landscaping along the employee parking area and stormwater management basin, that supports the environment, improves overall aesthetic and 'creates community spaces that promote physical and mental health' (Policy 5.3).

Additionally, the LVPC strongly recommends that the applicant consider incorporating sustainable systems and green building design into the facility. Sustainable utilities such as geothermal energy systems and greywater reuse for irrigation and plumbing reduce overhead costs of operation and provide greater return on investment while 'minimizing environmental impacts of development' (Policy 3.1). Green design principles such as the use of sustainable building materials and installation of a green roof would support the natural character and rural identity of the Township and 'promote development that complements the unique history, environment, culture and needs of the Valley (Policy 5.4). For more information about incorporating sustainability into industrial developments, please refer to the *LVPC High Cube and Automated Warehousing Community Guide* available at <https://www.lvpc.org/c-guides---model-regs.html>.

Environmental Impacts and Stormwater

The project is located in an area containing an abundance of natural features including wetlands, riparian buffers, steep slopes and woodlands. The LVPC strongly recommends that the Township ensure any impacts to the environment generated by the development are scrutinized to 'minimize environmental impacts of development' (Policy 3.2).

Additionally, the project site is located in proximity to the Delaware River, a federally designated Wild and Scenic River. To assess what impact the development will have on the viewshed from the river, the LVPC recommends that the Township require clear renderings of the development from critical viewing points for consideration, to 'promote development that complements the unique history, environment, culture and needs of the Valley' (Policy 5.4). Renderings of the development should be required from:

- The development towards the river
- The New Jersey side of the river towards the development
- The river directly in front of the development looking up
- The river at locations north and south of the development
- The Portland-Columbia Toll Bridge facing the development

The project site is located within the Martins/Jacoby Creeks 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.

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.

The LVPC has copied appropriate representatives from the Slate Belt Multi-Municipal Plan to further 'coordinate land use decisions across municipal boundaries' (Policy 1.4).

Sincerely,



Jillian Seitz
Senior Community Planner

cc: Justin Coyle, PE, Upper Mount Bethel Township Engineer; Ed Nelson, Upper Mount Bethel Township Manager; Cindy Beck, Upper Mount Bethel Township Secretary; Tina Smith, Northampton County Director of Community and Economic Development; Mark Hartney, Deputy Director of Community and Economic Development; Stephanie Steele, Portland Borough Council President; Kay Bucci, Portland Borough Council Vice President; Lance Prator, Portland Borough Mayor; Joseph Resta, Delaware River Joint Toll Bridge Commission; Michael Sodl, PE, VerTek Construction Management, LLC; Brooke Kerzner, Bangor Borough Mayor; Nathaniel Dysard, Bangor Borough Manager; John Couch, East Bangor Borough Council ; Jennifer Smethers, Lower Mount Bethel Township Manager; Robin Zmoda, Pen Argyl Borough Manager; Paul Levits, Plainfield Township Planning Commission Chair; Thomas Petrucci, Plainfield Township Manager; Dan Wilkins, Portland Borough Planning Commission Chair; Cathy Martino, Roseto Borough Manager; Charles Dertinger, Washington Township Planning Commission Chair; Louise Firestone, Wind Gap Borough Administrator; Tina Serfass, East Bangor, Portland, Wind Gap Boroughs + Washington Township Zoning Officer; Molly Wood, LANTA Planner/Land Use Specialist; Derrick Herrmann, PennDOT District 5 Traffic Engineer; Maryann Carroll, Delaware Greenway Partnership Executive Director; Daniel Ahn, Northampton County Conservation District Engineer; Geoffrey Reese, LVPC Director of Environmental Planning

ATTACHMENT 1

Act 167 Drainage Plan Review

May 28, 2021

Re: 303 Demi Road Planned Industrial Park
Plans Revised April 28, 2021
Upper Mt. Bethel Township
Northampton County

The proposed storm drainage concept presented in the plans and storm drainage calculations revised April 28, 2021 has been reviewed for consistency with the *Martins/Jacoby Creeks Watershed and Delaware River Sub-basin 1 Act 167 Storm Water Management Ordinance*, February 1996. A checklist of the Act 167 review items is attached for your information. As indicated on the checklist, each item of the Drainage Plan has been reviewed for consistency with the Act 167 Ordinance. A brief narrative of the review findings is as follows:

The proposed development is located within drainage district 143 of the Martins/Jacoby Creeks Watershed as delineated in the Act 167 Plan. As such, the runoff control criterion for the site is Conditional No Detention II. If downstream capacity exists to the stream channel, additional impervious may be discharged without detention. If downstream capacity does not exist, the applicant may apply a 100% Release Rate for the 2-, 10-, 25- and 100-year return period storms. Based on review of the plans and calculations, the following deficiencies are noted. The pre- and post-development mapping needs to clearly identify the land cover as used in the calculations. The runoff curve number used for gravel is not correct for most drainage areas. The 8-foot weir elevation associated with both underground basins should be raised above the 100-year water surface elevation to provide a safety factor for the release rate design. Surface basin 1B should be provided with an emergency spillway. Outlet structure 3 for basin 1B is not included in the routing calculations and no detail is provided. The freeboard requirements for basin 1B are not met. Therefore, the Drainage Plan has been found to be inconsistent with the Act 167 requirements.

Note that only those details of the Drainage Plan included on the checklist have been covered by this review. **Therefore, notable portions of the Drainage Plan not reviewed include any aspect of the post-construction storm water management plan concerning water quality, the details and design of any proposed water quality BMPs, the Erosion and Sedimentation Control Plan and the details of the runoff collection system (piping).** These items are reviewed by the municipal engineer and/or others, as applicable.

Once the outlined issues have been addressed, the revised plans, completed application and appropriate review fee will need to be resubmitted to our office. Please call me with any questions regarding these comments.

Sincerely yours,



Geoffrey A. Reese, PE
Director of Environmental Planning

Attachment

LVPC ACT 167 REVIEW CHECKLIST

Development Name: 303 Demi Road Planned Industrial Park
 Municipality: Upper Mt. Bethel Township
 Date: May 28, 2021

Watershed: Martins/Jacoby Creeks
 Reviewer: Geoffrey A. Reese, PE
 Checked by: _____

Ordinance Reference	Item	Consistency w/Ordinance			Comment
		Yes	No	N/A	
301.A-G.	General storm water management requirements.....	X	/	/	_____
	H. Consideration of volume controls	X	/	/	_____

302.A,B. Applicable Storm Water Management Provisions

Subarea(s)	143			
Criteria	CND II			

Criteria Key: RR = release rate; CND I = conditional no detention I; CND II = conditional no detention II

303.A.	Design consistency with applicable management provisions from 302.A. and B	/	X	/	See Attachment 1 for details.
B.	Mapping of Storm Water Management District Boundaries	/	/	X	_____
C.	Downstream capacity analysis	/	/	X	_____
D.	Multiple discharge points within a single subarea	X	/	/	_____
E,F.	Multiple discharge points within multiple subareas	/	/	X	_____
J.	Documentation of no increase in peak or volume	/	/	X	_____
K.	Documentation of "no harm" downstream	/	/	X	_____
L.	Regional or subregional detention analysis	/	/	X	_____
M.	Capacity improvements analysis	/	/	X	_____
304.A.	Computation method (rational or soil-cover-complex)	X	/	/	Soil-cover-complex method used.
B.	Verification of detention design by routing	/	X	/	See Attachment 1 for details.
C.	Minimum detention pond freeboard specifications.....	/	X	/	See Attachment 1 for details.
E.	Soil-cover-complex method design rainfall	X	/	/	_____
F.	Rainfall intensities for rational method.....	/	/	X	_____
G.	Curve Numbers for soil-cover-complex method.....	/	X	/	See Attachment 1 for details.
H.	Runoff coefficients for the rational method	/	/	X	_____
I.	Volume control storage volume	/	/	X	_____
J.	Common time of concentration.....	/	/	X	_____
K.	Manning equation to calculate watercourse capacity.....	/	/	X	_____
403.	Drainage Plan Contents	/	X	/	See Attachment 1 for details.



GREG ZEBROWSKI
Chair

STEVEN GLICKMAN
Vice Chair

PAMELA PEARSON
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

October 29, 2021

Mr. David Friedman, Chair
Upper Mount Bethel Township Planning Commission
387 Ye Olde Highway
Mt. Bethel, Pennsylvania 18343

**Re: 303 Demi Road Planned Industrial Park
Plans Revised September 23, 2021
Upper Mt. Bethel Township
Northampton County**

Dear Mr. Friedman:

The proposed storm drainage concept presented in the plans revised September 23, 2021 and storm drainage calculations revised September 22, 2021 has been reviewed for consistency with the *Martins/Jacoby Creeks Watershed and Delaware River Sub-basin 1 Act 167 Storm Water Management Ordinance*, February 1996. A checklist of the Act 167 review items is attached for your information. As indicated on the checklist, each item of the Drainage Plan has been reviewed for consistency with the Act 167 Ordinance. A brief narrative of the review findings is as follows:

The proposed development is located within drainage district 143 of the Martins/Jacoby Creeks Watershed as delineated in the Act 167 Plan. As such, the runoff control criterion for the site is Conditional No Detention II. If downstream capacity exists to the stream channel, additional impervious may be discharged without detention. If downstream capacity does not exist, the applicant may apply a 100% Release Rate for the 2-, 10-, 25- and 100-year return period storms. Based on review of the plans and calculations, the Drainage Plan has been found to be consistent with the Act 167 requirements.

Note that only those details of the Drainage Plan included on the checklist have been covered by this review. **Therefore, notable portions of the Drainage Plan not reviewed include any aspect of the post-construction storm water management plan concerning water quality, the details and design of any proposed water quality BMPs, the Erosion and Sedimentation Control Plan and the details of the runoff collection system (piping).** These items are reviewed by the municipal engineer and/or others, as applicable.

Mr. David Friedman
Upper Mt. Bethel Township
October 29, 2021
Page 2

Please call me with any questions regarding these comments.

Sincerely yours,

A handwritten signature in blue ink that reads "Geoffrey A. Reese". The signature is written in a cursive style with a large initial 'G'.

Geoffrey A. Reese, PE
Director of Environmental Planning

Attachment

cc: Justin Coyle, PE, Carroll Engineering
Michael Sodl, PE, VerTek Construction Management
Northampton County Conservation District