



Lehigh Valley Planning Commission

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July 29, 2025

Mr. Tom Mecca
Greenman-Pedersen, Inc.
52 Glenmaura National Blvd, Suite 302
Scranton, PA 18505

**Re: Act 537 Review - Sewage Facilities Planning Module
PPL Tower Redevelopment
City of Allentown, Lehigh County
DEP Code No. 2-39001362-3**

Dear Mr. Mecca:

The Lehigh Valley Planning Commission (LVPC) reviewed the above-referenced planning module according to the requirements of Act 537, the Pennsylvania Sewage Facilities Act. We offer the following comments.

This sewage facilities planning module is intended for the proposed redevelopment of the existing PPL Tower Office Complex, which includes three buildings (Tower Building, Tie Building and North Building) and is currently an office space, into a mixed-use development consisting of residential apartments and commercial space at 2 North 9th Street. The buildings are situated on two parcels with the Tower Building and Tie Building on the same parcel (549790819126) and the North Building on an adjacent parcel (549790734206). However, the proposed project and sewage planning encompasses two out of the three buildings, Tower Building and Tie Building. The North Building will require sewage planning in the future once a tenant and use has been determined. Currently, the Tower Building and Tie Building contain office space for 1200 employees, a cafeteria as well as an auditorium and conference room spaces. The proposed renovations to the two buildings include 112 apartment units with on-site amenities, a 100-seat restaurant/bar and office space. The Tower Building and Tie Building are proposed to be served by public sewage disposal by connecting to the existing public sewer system owned by the City of Allentown, with ultimate treatment at the Kline's Island wastewater treatment plant. The applicant is requesting a sewage flow increase to 33,375 gallons per day (gpd), which is a 15,331 gpd proposed increase in sewage flows from the current use and sewage flows of the two buildings.

According to *FutureLV: The Regional Plan*, the proposed project is located in an area designated for Development in the General Land Use Plan. The provision of public sewage disposal aligns with the *FutureLV* actions to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1) and 'promote development in areas with public sewer and water capacity' (of Policy 3.2).

Enclosed please find an executed Module Component 4b. Please call me if you have any questions regarding this review.

Sincerely,



Corinne Ruggiero, SEO
Environmental Planner

Enclosure

cc: Jesse Sadiua, Chief Planner, City of Allentown
Brandon Jones, Planner, City of Allentown
Jedadiah Bortz, Associate Engineer 2, City of Allentown
Jeffrey Mondulick, PA Department of Environmental Protection
Matthew Chorba, Director of Civil Engineering, Greenman-Pedersen, Inc.
Nicholas Dye (Applicant)

SEWAGE FACILITIES PLANNING MODULE COMPONENT 4B - COUNTY PLANNING AGENCY REVIEW

(or Planning Agency with Areawide Jurisdiction)

Note to Project Sponsor: To expedite the review of your proposal, one copy of your completed planning package and one copy of this *Planning Agency Review Component* should be sent to the county planning agency or planning agency with areawide jurisdiction for their comments.

SECTION A. PROJECT NAME (See Section A of instructions)

Project Name

PPL Tower Redevelopment

SECTION B. REVIEW SCHEDULE (See Section B of instructions)

1. Date plan received by county planning agency ---
2. Date plan received by planning agency with areawide jurisdiction July 23, 2025
 Agency name Lehigh Valley Planning Commission
3. Date review completed by agency July 29, 2025

SECTION C. AGENCY REVIEW (See Section C of instructions)

Yes No

- | | | | |
|-------------------------------------|-------------------------------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1. | Is there a county or areawide comprehensive plan adopted under the Municipalities Planning Code (53 P.S. 10101 <i>et seq.</i>)? |
| <input type="checkbox"/> | <input type="checkbox"/> | 2. | Is this proposal consistent with the comprehensive plan for land use? <i>Area designated for Development in Future LV General Land Use Plan.</i> |
| <input type="checkbox"/> | <input type="checkbox"/> | 3. | Does this proposal meet the goals and objectives of the plan?
<i>Meets sewage disposal goals and objectives.</i>
If no, describe goals and objectives that are not met _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4. | Is this proposal consistent with the use, development, and protection of water resources?
If no, describe inconsistency _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 5. | Is this proposal consistent with the county or areawide comprehensive land use planning relative to Prime Agricultural Land Preservation?
If no, describe inconsistencies: _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 6. | Does this project propose encroachments, obstructions, or dams that will affect wetlands?
If yes, describe impact _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | 7. | Will any known historical or archeological resources be impacted by this project? <i>PHMC determination</i>
If yes, describe impacts --- |
| <input type="checkbox"/> | <input type="checkbox"/> | 8. | Will any known endangered or threatened species of plant or animal be impacted by the development project? <i>See PNDI results</i>
If yes, describe impacts _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 9. | Is there a county or areawide zoning ordinance? |
| <input type="checkbox"/> | <input type="checkbox"/> | 10. | Does this proposal meet the zoning requirements of the ordinance? <i>N/A</i>
If no, describe inconsistencies --- |

SECTION C. AGENCY REVIEW (continued)

- | Yes | No | |
|--------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | 11. Have all applicable zoning approvals been obtained? <u>N/A</u> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 12. Is there a county or areawide subdivision and land development ordinance? <u>Not applicable to the City of Allentown</u> |
| <input type="checkbox"/> | <input type="checkbox"/> | 13. Does this proposal meet the requirements of the ordinance? <u>N/A</u>
If no, describe which requirements are not met --- |
| <input type="checkbox"/> | <input type="checkbox"/> | 14. Is this proposal consistent with the municipal Official Sewage Facilities Plan? <u>See municipal interpretation</u>
If no, describe inconsistency --- |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 15. Are there any wastewater disposal needs in the area adjacent to this proposal that should be considered by the municipality?
If yes, describe --- |
| <input type="checkbox"/> | <input type="checkbox"/> | 16. Has a waiver of the sewage facilities planning requirements been requested for the residual tract of this subdivision? <u>N/A</u>
If yes, is the proposed waiver consistent with applicable ordinances.
If no, describe the inconsistencies --- |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 17. Does the county have a stormwater management plan as required by the Stormwater Management Act? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | If yes, will this project plan require the implementation of storm water management measures? |
| 18. Name, Title and signature of person completing this section: | | |
| Name: <u>Corinne Ruggiero</u> | | |
| Title: <u>Environmental Planner</u> | | |
| Signature: <u>Corinne Ruggiero</u> | | |
| Date: <u>July 29, 2025</u> | | |
| Name of County or Areawide Planning Agency: <u>Lehigh Valley Planning Commission</u> | | |
| Address: <u>615 Waterfront Drive, Suite 201, Allentown, PA 18102</u> | | |
| Telephone Number: <u>610-264-4544</u> | | |

SECTION D. ADDITIONAL COMMENTS (See Section D of instructions)

This component does not limit county planning agencies from making additional comments concerning the relevancy of the proposed plan to other plans or ordinances. If additional comments are needed, attach additional sheets.

The county planning agency must complete this component within 60 days.

This component and any additional comments are to be returned to the applicant.