

Date 4/21/2020

Name BARRY ISETT & ASSOCIATES  
Address 85 S. ROUTE 100  
ALLENTOWN, PA 18106

RE: Planning Module for New Land Development  
Subdivision FILM TECH CORP.  
COMMERCIAL 6400 GPD  
CITY OF ALLENTOWN, LEHIGH County  
DEP Code No: 2-39601231-3

Dear:

In response to your postcard application, enclosed are the applicable planning modules required for the proposed development. Please submit the completed planning module and supporting information to the municipality(ies) in which the project is located. The Department must receive 3 copies. Please answer all questions. Do Not answer "N/A" or "Not Applicable". If you find a question does not apply, explain all reasons to support that answer.

A copy of the letter MUST be attached to the planning module when resubmitted through the municipality to the Department. This letter is to be used as a completion checklist and guide to completing the planning modules and does not supersede the rules and regulations found in Chapter 71. The municipality must submit the complete module package to the Department, (see end of letter for certification statement).

Effective December 15, 1995 Act 149 required the Department to assess planning module review fees. This fee is based on the type of development and total equivalent dwelling units proposed. The applicant will be billed upon Department approval or denial of the project.

If you are applying for a planning module exemption for this project, the exemption was not granted for the following reason(s):

Materials required	Municipal Checklist	DEP Completeness Review
X	Department cover/Checklist letter	
X	Transmittal letter, completed and signed by the Municipal Secretary.	
X	Resolution of Adoption completed and signed by the Municipal Secretary and containing the municipal seal.	
	Component 2-Follow attached guidance.	
X	Component 3-Follow attached guidance.	
	Component 3s-Follow attached guidance.	
X	Component 4a-Municipal Planning Agency Review	
X	Component 4b-County Planning Agency Review	
	Potential Impact(s) has occurred based on your search of the PA Natural Diversity Inventory. These issues must be resolved with each agency before the Department's review of Planning Modules can occur.	
	Sewage management program as per 25 Pa. Code Subsection 71.72	
	Hydrogeologic Study – Analysis of interbasin transfer of water between a Special Protection watershed into a Non-Special Protection watershed.	
	Delaware River Basin Commission Notice of Applications Received (NAR) for projects with sewage flows exceeding 10,000 GPD.	
	Preliminary hydrogeology	
	Permeability testing, to be determined at site testing	
	Detailed hydrogeologic study	

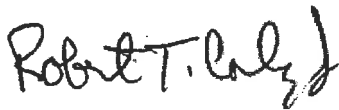
\_\_\_\_\_      \_\_\_\_\_      Socio-economic justification      \_\_\_\_\_

\_\_\_\_\_      \_\_\_\_\_      If the project is located in a Special  
Protection Watershed, please submit an  
Antidegradation Analysis meeting the  
Requirement of Chapter 93.4(b), 93.4(a)  
and 93.4c(b)(2)      \_\_\_\_\_

In all cases, address the immediate and long range sewage disposal needs of the proposal and comply with 25 Pa. Code, Chapter 71, Subchapter C relating to New Land Development Plan Revisions.

Please note that the Department will return the planning module package if an incomplete revision is submitted.

Sincerely,



Robert T. Corby, Jr.  
Sewage Planning Specialist  
Clean Water Program

CERTIFICATION STATEMENT

I certify that this submittal is complete and includes all requested items. Failure to submit a complete module package will result in return of package.

Municipal Address \_\_\_\_\_  
\_\_\_\_\_

Municipal Telephone Number \_\_\_\_\_

Signed: \_\_\_\_\_, Municipal Secretary

List below any individuals and address that should be copied if the planning module is returned to the municipality (if address is not provided, no copy will be sent):

\_\_\_\_\_  
\_\_\_\_\_

11

## Checklist



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT

## Completeness Checklist

The individual completing the component should use the checklist below to assure that all items are included in the module package. The municipality should confirm that the required items have been included within 10 days of receipt, and if complete, sign and date the checklist.

### Sewage Collection and Treatment Facilities

- ☒ Name and Address of land development project.
- ☒ U.S.G.S. 7.5 minute topographic map with development area plotted.
- ☒ Project Narrative.
- ☒ Letter from water company (if applicable).
- ☒ Alternative Analysis Narrative.
- ☐ Details of chosen financial assurance method.
- ☐ Proof of Public Notification (if applicable).
- ☒ Name of existing collection and conveyance facilities.
- ☒ Name and NPDES number of existing treatment facility to serve proposed development.
- ☒ Plot plan of project with required information.
- ☒ Total sewage flows to facilities table.
- ☒ Signature of existing collection and/or conveyance Chapter 94 report preparer.
- ☒ Signature of existing treatment facility Chapter 94 report preparer.
- ☒ Letter granting allocation to project (if applicable).
- ☒ Signature acknowledging False Swearing Statement.
- ☒ Completed Component 4 (Planning Agency Review) for each existing planning agency and health department.
- ☒ Information on selected treatment and disposal option.
- ☐ Permeability information (if applicable).
- ☐ Preliminary hydrogeology (if applicable).
- ☐ Detailed hydrogeology (if applicable).

### Municipal Action

- ☒ Component 3 (Sewage Collection and Treatment Facilities).
- ☒ Component 4 (Planning Agency Comments and Responses).
- ☐ Proof of Public Notification.
- ☐ Long-term operation and maintenance option selection.
- ☐ Comments, and responses to comments generated by public notification.
- ☒ Transmittal Letter

\_\_\_\_\_  
Signature of Municipal Official

\_\_\_\_\_  
Date submittal determined complete





## RESOLUTION FOR PLAN REVISION FOR NEW LAND DEVELOPMENT

RESOLUTION OF THE ~~(SUPERVISORS)~~ ~~(COMMISSIONERS)~~ (COUNCILMEN) of Allentown  
(TOWNSHIP) ~~(BOROUGH)~~ (CITY), Lehigh COUNTY, PENNSYLVANIA (hereinafter "the municipality").

**WHEREAS** Section 5 of the Act of January 24, 1966, P.L. 1535, No. 537, known as the *Pennsylvania Sewage Facilities Act*, as Amended, and the rules and Regulations of the Pennsylvania Department of Environmental Protection (DEP) adopted thereunder, Chapter 71 of Title 25 of the Pennsylvania Code, require the municipality to adopt an Official Sewage Facilities Plan providing for sewage services adequate to prevent contamination of waters of the Commonwealth and/or environmental health hazards from sewage wastes, and to revise said plan whenever it is necessary to determine whether a proposed method of sewage disposal for a new land development conforms to a comprehensive program of pollution control and water quality management, and

**WHEREAS** Filmtech land developer has proposed the development of a parcel of land identified as

Filmtech – Mitchell Avenue Site, and described in the attached Sewage Facilities Planning Module, and  
name of subdivision

proposes that such subdivision be served by: (check all that apply), ☒ sewer tap-ins, ☐ sewer extension, ☐ new treatment facility, ☐ individual onlot systems, ☐ community onlot systems, ☐ spray irrigation, ☐ retaining tanks, ☐ other, (please specify).

**WHEREAS**, City of Allentown municipality finds that the subdivision described in the attached

Sewage Facilities Planning Module conforms to applicable sewage related zoning and other sewage related municipal ordinances and plans, and to a comprehensive program of pollution control and water quality management.

**NOW, THEREFORE, BE IT RESOLVED** that the ~~(Supervisors)~~ ~~(Commissioners)~~ (Councilmen) of the ~~(Township)~~ ~~(Borough)~~ (City) of Allentown hereby adopt and submit to DEP for its approval as a revision to the "Official Sewage Facilities Plan" of the municipality the above referenced Sewage Facilities Planning Module which is attached hereto.

I \_\_\_\_\_, Secretary,  
(Signature)

~~Township Board of Supervisors~~ ~~(Borough Council)~~ (City Councilmen), hereby certify that the foregoing is a true copy of the ~~Township~~ ~~(Borough)~~ (City) Resolution # \_\_\_\_\_, adopted, \_\_\_\_\_, 20\_\_\_\_.

Municipal Address:

City of Allentown  
435 Hamilton Street  
Allentown, PA 18101  
Telephone \_\_\_\_\_

Seal of  
Governing Body







## SEWAGE FACILITIES PLANNING MODULE

### Component 3. Sewage Collection and Treatment Facilities

(Return completed module package to appropriate municipality)

DEP USE ONLY				
DEP CODE #	CLIENT ID #	SITE ID #	APS ID #	AUTH ID #
2-39001231-3				

This planning module component is used to fulfill the planning requirements of Act 537 for the following types of projects: (1) a subdivision to be served by sewage collection, conveyance or treatment facilities, (2) a tap-in to an existing collection system with flows on a lot of 2 EDU's or more, or (3) the construction of, or modification to, wastewater collection, conveyance or treatment facilities that will require DEP to issue or modify a Clean Streams Law permit. Planning for any project that will require DEP to issue or modify a permit cannot be processed by a delegated agency. Delegated agencies must send their projects to DEP for final planning approval.

This component, along with any other documents specified in the cover letter, must be completed and submitted to the municipality with jurisdiction over the project site for review and approval. All required documentation must be attached for the Sewage Facilities Planning Module to be complete. Refer to the instructions for help in completing this component.

**REVIEW FEES:** Amendments to the Sewage Facilities Act established fees to be paid by the developer for review of planning modules for land development. These fees may vary depending on the approving agency for the project (DEP or delegated local agency). Please see section R and the instructions for more information on these fees.

**NOTE:** All projects must complete Sections A through I, and Sections O through R. Complete Sections J, K, L, M and/or N if applicable or marked ☒.

#### A. PROJECT INFORMATION (See Section A of instructions)

1. Project Name Filmtech – Mitchell Avenue Site
2. Brief Project Description Commercial office/warehouse land development

#### B. CLIENT (MUNICIPALITY) INFORMATION (See Section B of instructions)

Municipality Name	County	City	Boro	Twp
City of Allentown	Lehigh County	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Municipality Contact Individual - Last Name	First Name	MI	Suffix	Title
Woodward	Irene			Director of Planning
Additional Individual Last Name	First Name	MI	Suffix	Title
Municipality Mailing Address Line 1	Mailing Address Line 2			
435 Hamilton Street				
Address Last Line -- City	State	ZIP+4		
Allentown	PA	18101		
Area Code + Phone + Ext.	FAX (optional)	Email (optional)		
610-437-7611		Irene.Woodward@allentownpa.gov		



**C. SITE INFORMATION** (See Section C of instructions)

**Site (Land Development or Project) Name**

Filmtech – Mitchell Avenue Site

Site Location Line 1

2843 Mitchell Avenue

Site Location Line 2

Site Location Last Line -- City

Allentown

State

PA

ZIP+4

18103

Latitude

40.559990

Longitude

-75.482990

Detailed Written Directions to Site Lehigh Street, 4/10 mile south of Interstate 78, turn left onto 31<sup>st</sup> Street SW, then turn left on W. Emaus Avenue, follow 1/4 mile then turn left onto 29<sup>th</sup> Street SW to intersection with Mitchell Avenue.

Description of Site Project site is vacant, undeveloped and forested and is traversed by a small perennial drainageway

**Site Contact (Developer/Owner)**

Last Name

Marerro

First Name

Lucas

MI

Suffix

Phone

(610) 709-9999

Ext.

Site Contact Title

Site Contact Firm (if none, leave blank)

Filmtech

FAX

Email

lucasmarrero@optonline.net

Mailing Address Line 1

2131 31st Street SW

Mailing Address Line 2

Mailing Address Last Line -- City

Allentown

State

PA

ZIP+4

18103

**D. PROJECT CONSULTANT INFORMATION** (See Section D of instructions)

Last Name

Valentine

First Name

Keith

MI

A

Suffix

Title

Sr. Environmental Scientist

Consulting Firm Name

Barry Isett & Associates, Inc.

Mailing Address Line 1

85 S. Route 100

Mailing Address Line 2

Address Last Line -- City

Allentown

State

PA

ZIP+4

18106

Country

USA

Email

kvalentine@barryisett.com

Area Code + Phone

610-398-0904

Ext.

Area Code + FAX

610-481-9098

**E. AVAILABILITY OF DRINKING WATER SUPPLY**

The project will be provided with drinking water from the following source: (Check appropriate box)

☐ Individual wells or cisterns.

☐ A proposed public water supply.

☒ An existing public water supply.

If existing public water supply is to be used, provide the name of the water company and attach documentation from the water company stating that it will serve the project.

Name of water company: Lehigh County Authority

**F. PROJECT NARRATIVE** (See Section F of instructions)

☒ A narrative has been prepared as described in Section F of the instructions and is attached.

The applicant may choose to include additional information beyond that required by Section F of the instructions.



**G. PROPOSED WASTEWATER DISPOSAL FACILITIES** (See Section G of instructions)

Check all boxes that apply, and provide information on collection, conveyance and treatment facilities and EDU's served. This information will be used to determine consistency with Chapter 93 (relating to wastewater treatment requirements).

**1. COLLECTION SYSTEM**

a. Check appropriate box concerning collection system

- ☐ New collection system      ☐ Pump Station      ☐ Force Main  
☐ Grinder pump(s)      ☒ Extension to existing collection system      ☐ Expansion of existing facility

Clean Streams Law Permit Number \_\_\_\_\_

b. Answer questions below on collection system

Number of EDU's and proposed connections to be served by collection system. EDU's 8.35 ~ 9

Connections 1

Name of:

existing collection or conveyance system City of Allentown

owner Lehigh County Authority Lessee - City of Allentown

existing interceptor Jordan Creek Interceptor

owner Lehigh County Authority Lessee - City of Allentown

**2. WASTEWATER TREATMENT FACILITY**

Check all boxes that apply, and provide information on collection, conveyance and treatment facilities and EDU's served. This information will be used to determine consistency with Chapter(s) 91 (relating to general provisions), 92 (relating to national Pollution Discharge Elimination System permitting, monitoring and compliance) and 93 (relating to water quality standards).

a. Check appropriate box and provide requested information concerning the treatment facility

- ☐ New facility    ☒ Existing facility    ☐ Upgrade of existing facility    ☐ Expansion of existing facility

Name of existing facility Kline's Island WWTP

NPDES Permit Number for existing facility PA0026000

Clean Streams Law Permit Number \_\_\_\_\_

Location of discharge point for a new facility. Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

b. The following certification statement must be completed and signed by the wastewater treatment facility permittee or their representative.

As an authorized representative of the permittee, I confirm that the Kline's Island WWTP  
(Name from above) sewage treatment facilities can accept sewage flows from this project without adversely affecting the facility's ability to achieve all applicable technology and water quality based effluent limits (see Section I) and conditions contained in the NPDES permit identified above.

Name of Permittee Agency, Authority, Municipality City of Allentown, LCA - Agent

Name of Responsible Agent Liesel M. Gross

Agent Signature Liesel M. Gross Date 7/6/2020

(Also see Section I. 4.)



## G. PROPOSED WASTEWATER DISPOSAL FACILITIES (Continued)

### 3. PLOT PLAN

The following information is to be submitted on a plot plan of the proposed subdivision.

- |   |  |
|---|--|
| a. Existing and proposed buildings.   | j. Any designated recreational or open space area.   |
| b. Lot lines and lot sizes.   | k. Wetlands - from National Wetland Inventory Mapping and USGS Hydric Soils Mapping.   |
| c. Adjacent lots.   | l. Flood plains or Flood prone areas, floodways, (Federal Flood Insurance Mapping)   |
| d. Remainder of tract.  | m. Prime Agricultural Land.  |
| e. Existing and proposed sewerage facilities. Plot location of discharge point, land application field, spray field, COLDS, or LVCOLDS if a new facility is proposed. | n. Any other facilities (pipelines, power lines, etc.)   |
| f. Show tap-in or extension to the point of connection to existing collection system (if applicable).   | o. Orientation to north.   |
| g. Existing and proposed water supplies and surface water (wells, springs, ponds, streams, etc.)  | p. Locations of all site testing activities (soil profile test pits, slope measurements, permeability test sites, background sampling, etc. (if applicable). |
| h. Existing and proposed rights-of-way.   | q. Soils types and boundaries when a land based system is proposed.  |
| i. Existing and proposed buildings, streets, roadways, access roads, etc.   | r. Topographic lines with elevations when a land based system is proposed  |

### 4. WETLAND PROTECTION

YES NO

- a. ☒ ☐ Are there wetlands in the project area? If yes, ensure these areas appear on the plot plan as shown in the mapping or through on-site delineation.
- b. ☐ ☒ Are there any construction activities (encroachments, or obstructions) proposed in, along, or through the wetlands? If yes, Identify any proposed encroachments on wetlands and identify whether a General Permit or a full encroachment permit will be required. If a full permit is required, address time and cost impacts on the project. Note that wetland encroachments should be avoided where feasible. Also note that a feasible alternative **MUST BE SELECTED** to an identified encroachment on an exceptional value wetland as defined in Chapter 105. Identify any project impacts on streams classified as HQ or EV and address impacts of the permitting requirements of said encroachments on the project.

### 5. PRIME AGRICULTURAL LAND PROTECTION

YES NO

- ☐ ☒ Will the project involve the disturbance of prime agricultural lands?  
If yes, coordinate with local officials to resolve any conflicts with the local prime agricultural land protection program. The project must be consistent with such municipal programs before the sewage facilities planning module package may be submitted to DEP.  
If no, prime agricultural land protection is not a factor to this project.
- ☐ ☐ Have prime agricultural land protection issues been settled?

### 6. HISTORIC PRESERVATION ACT

YES NO

- ☒ ☐ Sufficient documentation is attached to confirm that this project is consistent with DEP Technical Guidance 012-0700-001 *Implementation of the PA State History Code* (available online at the DEP website at [www.dep.state.pa.us](http://www.dep.state.pa.us), select "subject" then select "technical guidance"). As a minimum this includes copies of the completed Cultural Resources Notice





(CRN), a return receipt for its submission to the PHMC and the PHMC review letter.

## 7. PROTECTION OF RARE, ENDANGERED OR THREATENED SPECIES

Check one:

- ☒ The "Pennsylvania Natural Diversity Inventory (PNDI) Project Environmental Review Receipt" resulting from my search of the PNDI database and all supporting documentation from jurisdictional agencies (when necessary) is/are attached.
- ☐ A completed "Pennsylvania Natural Diversity Inventory (PNDI) Project Planning & Environmental Review Form," (PNDI Form) available at [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us), and all required supporting documentation is attached. I request DEP staff to complete the required PNDI search for my project. I realize that my planning module will be considered incomplete upon submission to the Department and that the DEP review will not begin, and that processing of my planning module will be delayed, until a "PNDI Project Environmental Review Receipt" and all supporting documentation from jurisdictional agencies (when necessary) is/are received by DEP.

Applicant or Consultant Initials KAV \_\_\_\_\_

## H. ALTERNATIVE SEWAGE FACILITIES ANALYSIS (See Section H of instructions)

- ☒ An alternative sewage facilities analysis has been prepared as described in Section H of the attached instructions and is attached to this component.
- The applicant may choose to include additional information beyond that required by Section H of the attached instructions.

## I. COMPLIANCE WITH WATER QUALITY STANDARDS AND EFFLUENT LIMITATIONS (See Section I of instructions) (Check and complete all that apply.)

### 1. Waters designated for Special Protection

- ☐ The proposed project will result in a new or increased discharge into special protection waters as identified in Title 25, Pennsylvania Code, Chapter 93. The Social or Economic Justification (SEJ) required by Section 93.4c. is attached.

### 2. Pennsylvania Waters Designated As Impaired

- ☐ The proposed project will result in a new or increased discharge of a pollutant into waters that DEP has identified as being impaired by that pollutant. A pre-planning meeting was held with the appropriate DEP regional office staff to discuss water quality based discharge limitations.

### 3. Interstate and International Waters

- ☐ The proposed project will result in a new or increased discharge into interstate or international waters. A pre-planning meeting was held with the appropriate DEP regional office staff to discuss effluent limitations necessary to meet the requirements of the interstate or international compact.

### 4. Tributaries To The Chesapeake Bay

- ☐ The proposed project result in a new or increased discharge of sewage into a tributary to the Chesapeake Bay. This proposal for a new sewage treatment facility or new flows to an existing facility includes total nitrogen and total phosphorus in the following amounts: \_\_\_\_\_ pounds of TN per year, and \_\_\_\_\_ pounds of TP per year. Based on the process design and effluent limits, the total nitrogen treatment capacity of the wastewater treatment facility is \_\_\_\_\_ pounds per year and the total phosphorus capacity is \_\_\_\_\_ pounds per year as determined by the wastewater treatment facility permittee. The permittee has determined that the additional TN and TP to be contributed by this project (as modified by credits and/or offsets to be provided) will not cause the discharge to exceed the annual total mass limits for these parameters. Documentation of compliance with nutrient allocations is attached.

Name of Permittee Agency, Authority, Municipality \_\_\_\_\_

Initials of Responsible Agent (See Section G 2.b) \_\_\_\_\_

See *Special Instructions* (Form 3800-FM-BPNPSM0353-1) for additional information on Chesapeake Bay watershed requirements.



☐ **J. CHAPTER 94 CONSISTENCY DETERMINATION** (See Section J of instructions)

Projects that propose the use of existing municipal collection, conveyance or wastewater treatment facilities, or the construction of collection and conveyance facilities to be served by existing municipal wastewater treatment facilities must be consistent with the requirements of Title 25, Chapter 94 (relating to Municipal Wasteload Management). If not previously included in Section F, include a general map showing the path of the sewage to the treatment facility. If more than one municipality or authority will be affected by the project, please obtain the information required in this section for each. Additional sheets may be attached for this purpose.

1. Project Flows 3,340 gpd
2. Total Sewage Flows to Facilities (pathway from point of origin through treatment plant)

When providing "treatment facilities" sewage flows, use Annual Average Daily Flow for "average" and Maximum Monthly Average Daily Flow for "peak" in all cases. For "peak flows" in "collection" and "conveyance" facilities, indicate whether these flows are "peak hourly flow" or "peak instantaneous flow" and how this figure was derived (i.e., metered, measured, estimated, etc.).

- a. Enter average and peak sewage flows for each proposed or existing facility as designed or permitted.
- b. Enter the average and peak sewage flows for the most restrictive sections of the existing sewage facilities.
- c. Enter the average and peak sewage flows, projected for 5 years (2 years for pump stations) through the most restrictive sections of the existing sewage facilities. Include existing, proposed (this project) and future project (other approved projects) flows.

To complete the table, refer to the instructions, Section J.

	a. Design and/or Permitted Capacity <del>(gpd)</del> MGD		b. Present Flows <del>(gpd)</del> MGD		c. Projected Flows in 5 years <del>(gpd)</del> MGD (2 years for P.S.)	
	Average	Peak	Average	Peak	Average	Peak
Collection	0.77	3.09	0.27	0.99	0.30	1.09
Conveyance	58	81	30	78 <sup>m</sup>	31	80 <sup>m</sup>
Treatment	40	40	32.3	40	33.4	42

3. Collection and Conveyance Facilities

<sup>m</sup> Peak Hourly Flow - Estimated

The questions below are to be answered by the sewer authority, municipality, or agency responsible for completing the Chapter 94 report for the collection and conveyance facilities. These questions should be answered in coordination with the latest Chapter 94 annual report and the above table. The individual(s) signing below must be legally authorized to make representation for the organization.

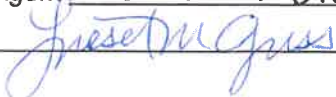
YES NO

- a. ☐ ☒ This project proposes sewer extensions or tap-ins. Will these actions create a hydraulic overload within five years on any existing collection or conveyance facilities that are part of the system?

If yes, this sewage facilities planning module will not be accepted for review by the municipality, delegated local agency and/or DEP until all inconsistencies with Chapter 94 are resolved or unless there is an approved Corrective Action Plan (CAP) granting an allocation for this project. A letter granting allocations to this project under the CAP must be attached to the module package.

If no, a representative of the sewer authority, municipality, or agency responsible for completing the Chapter 94 report for the collection and conveyance facilities must sign below to indicate that the collection and conveyance facilities have adequate capacity and are able to provide service to the proposed development in accordance with both §71.53(d)(3) and Chapter 94 requirements and that this proposal will not affect that status.

- b. Collection System

Name of Agency, Authority, Municipality City of Allentown, LCA - Agent  
 Name of Responsible Agent Liesel M. Gross  
 Agent Signature  Date 7/16/2020



☐ **J. CHAPTER 94 CONSISTENCY DETERMINATION** (See Section J of instructions)

c. Conveyance System

Name of Agency, Authority, Municipality City of Allentown, LCA - Agent

Name of Responsible Agent Liesel M. Gross

Agent Signature *Liesel M. Gross*

Date 7/16/2020

4. Treatment Facility

The questions below are to be answered by a representative of the facility permittee in coordination with the information in the table and the latest Chapter 94 report. The individual signing below must be legally authorized to make representation for the organization.

YES NO

- a. ☒ ☐ This project proposes the use of an existing wastewater treatment plant for the disposal of sewage. Will this action create a hydraulic or organic overload within 5 years at that facility?

If yes, this planning module for sewage facilities will not be reviewed by the municipality, delegated local agency and/or DEP until this inconsistency with Chapter 94 is resolved or unless there is an approved CAP granting an allocation for this project. A letter granting allocations to this project under the CAP must be attached to the planning module.

If no, the treatment facility permittee must sign below to indicate that this facility has adequate treatment capacity and is able to provide wastewater treatment services for the proposed development in accordance with both §71.53(d)(3) and Chapter 94 requirements and that this proposal will not impact that status.

- b. Name of Agency, Authority, Municipality City of Allentown, LCA - Agent

Name of Responsible Agent Liesel M. Gross

Agent Signature *Liesel M. Gross*

Date 7/16/2020

☐ **K. TREATMENT AND DISPOSAL OPTIONS** (See Section K of instructions)

This section is for land development projects that propose construction of wastewater treatment facilities. Please note that, since these projects require permits issued by DEP, these projects may **NOT** receive final planning approval from a delegated local agency. Delegated local agencies must send these projects to DEP for final planning approval.

Check the appropriate box indicating the selected treatment and disposal option.

- ☐ 1. Spray irrigation (other than individual residential spray systems (IRSIS)) or other land application is proposed, and the information requested in Section K.1. of the planning module instructions are attached.
- ☐ 2. Recycle and reuse is proposed and the information requested in Section K-2 of the planning module instructions is attached.
- ☐ 3. A discharge to a dry stream channel is proposed, and the information requested in Section K.3. of the planning module instructions are attached.
- ☐ 4. A discharge to a perennial surface water body is proposed, and the information requested in Section K.4. of the planning module instructions are attached.

☐ **L. PERMEABILITY TESTING** (See Section L of instructions)

- ☐ The information required in Section L of the instructions is attached.

☐ **M. PRELIMINARY HYDROGEOLOGIC STUDY** (See Section M of instructions)

- ☐ The information required in Section M of the instructions is attached.



☐ **N. DETAILED HYDROGEOLOGIC STUDY** (See Section N of instructions)

☐ The detailed hydrogeologic information required in Section N. of the instructions is attached.

**O. SEWAGE MANAGEMENT** (See Section O of instructions)

(1-3 for completion by the developer(project sponser), 4-5 for completion by the non-municipal facility agent and 6 for completion by the municipality)

Yes No

1. ☐ ☐ Is connection to, or construction of, a DEP permitted, non-municipal sewage facility or a local agency permitted, community onlot sewage facility proposed.

If Yes, respond to the following questions, attach the supporting analysis, and an evaluation of the options available to assure long-term proper operation and maintenance of the proposed non-municipal facilities. If No, skip the remainder of Section O.

2. Project Flows \_\_\_\_\_ gpd

Yes No

3. ☐ ☐ Is the use of nutrient credits or offsets a part of this project?

If yes, attach a letter of intent to purchase the necessary credits and describe the assurance that these credits and offsets will be available for the remaining design life of the non-municipal sewage facility;

(For completion by non-municipal facility agent)

4. Collection and Conveyance Facilities

The questions below are to be answered by the organization/individual responsible for the non-municipal collection and conveyance facilities. The individual(s) signing below must be legally authorized to make representation for the organization.

Yes No

- a. ☐ ☐ If this project proposes sewer extensions or tap-ins, will these actions create a hydraulic overload on any existing collection or conveyance facilities that are part of the system?

If yes, this sewage facilities planning module will not be accepted for review by the municipality, delegated local agency and/or DEP until this issue is resolved.

If no, a representative of the organization responsible for the collection and conveyance facilities must sign below to indicate that the collection and conveyance facilities have adequate capacity and are able to provide service to the proposed development in accordance with Chapter 71 §71.53(d)(3) and that this proposal will not affect that status.

- b. Collection System

Name of Responsible Organization \_\_\_\_\_

Name of Responsible Agent \_\_\_\_\_

Agent Signature \_\_\_\_\_

Date \_\_\_\_\_

- c. Conveyance System

Name of Responsible Organization \_\_\_\_\_

Name of Responsible Agent \_\_\_\_\_

Agent Signature \_\_\_\_\_

Date \_\_\_\_\_





5. Treatment Facility

The questions below are to be answered by a representative of the facility permittee. The individual signing below must be legally authorized to make representation for the organization.

Yes No

- a. ☐ ☐ If this project proposes the use of an existing non-municipal wastewater treatment plant for the disposal of sewage, will this action create a hydraulic or organic overload at that facility?

If yes, this planning module for sewage facilities will not be reviewed by the municipality, delegated local agency and/or DEP until this issue is resolved.

If no, the treatment facility permittee must sign below to indicate that this facility has adequate treatment capacity and is able to provide wastewater treatment services for the proposed development in accordance with §71.53(d)(3) and that this proposal will not impact that status.

b. Name of Facility \_\_\_\_\_

Name of Responsible Agent \_\_\_\_\_

Agent Signature \_\_\_\_\_

Date \_\_\_\_\_

(For completion by the municipality)

6. ☐ The **SELECTED OPTION** necessary to assure long-term proper operation and maintenance of the proposed non-municipal facilities is clearly identified with documentation attached in the planning module package.

**P. PUBLIC NOTIFICATION REQUIREMENT** (See Section P of instructions)

This section must be completed to determine if the applicant will be required to publish facts about the project in a newspaper of general circulation to provide a chance for the general public to comment on proposed new land development projects. This notice may be provided by the applicant or the applicant's agent, the municipality or the local agency by publication in a newspaper of general circulation within the municipality affected. Where an applicant or an applicant's agent provides the required notice for publication, the applicant or applicant's agent shall notify the municipality or local agency and the municipality and local agency will be relieved of the obligation to publish. The required content of the publication notice is found in Section P of the instructions.

To complete this section, each of the following questions must be answered with a "yes" or "no". Newspaper publication is required if any of the following are answered "yes".

Yes No

1. ☐ ☒ Does the project propose the construction of a sewage treatment facility ?
2. ☐ ☒ Will the project change the flow at an existing sewage treatment facility by more than 50,000 gallons per day?
3. ☐ ☒ Will the project result in a public expenditure for the sewage facilities portion of the project in excess of \$100,000?
4. ☐ ☒ Will the project lead to a major modification of the existing municipal administrative organizations within the municipal government?
5. ☐ ☒ Will the project require the establishment of *new* municipal administrative organizations within the municipal government?
6. ☐ ☐ Will the project result in a subdivision of 50 lots or more? (onlot sewage disposal only)
7. ☐ ☒ Does the project involve a major change in established growth projections?
8. ☐ ☒ Does the project involve a different land use pattern than that established in the municipality's Official Sewage Plan?



**P. PUBLIC NOTIFICATION REQUIREMENT cont'd.** (See Section P of instructions)

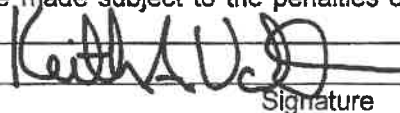
9. ☐ ☒ Does the project involve the use of large volume onlot sewage disposal systems (Flow > 10,000 gpd)?
10. ☐ ☒ Does the project require resolution of a conflict between the proposed alternative and consistency requirements contained in §71.21(a)(5)(i), (ii), (iii)?
11. ☐ ☒ Will sewage facilities discharge into high quality or exceptional value waters?
- ☐ Attached is a copy of:
- ☐ the public notice,
  - ☐ all comments received as a result of the notice,
  - ☐ the municipal response to these comments.
- ☐ No comments were received. A copy of the public notice is attached.

**Q. FALSE SWEARING STATEMENT** (See Section Q of instructions)

I verify that the statements made in this component are true and correct to the best of my knowledge, information and belief. I understand that false statements in this component are made subject to the penalties of 18 PA C.S.A. §4904 relating to unsworn falsification to authorities.

Keith A. Valentine, CPS

Name (Print)



Signature

Sr. Environmental Scientist w/Barry Isett & Associates

June 11, 2020

Title

Date

85 S. Route 100, Allentown, PA 18106

610-398-0904

Address

Telephone Number

**R. REVIEW FEE** (See Section R of instructions)

The Sewage Facilities Act establishes a fee for the DEP planning module review. DEP will calculate the review fee for the project and invoice the project sponsor **OR** the project sponsor may attach a self-calculated fee payment to the planning module prior to submission of the planning package to DEP. (Since the fee and fee collection procedures may vary if a "delegated local agency" is conducting the review, the project sponsor should contact the "delegated local agency" to determine these details.) Check the appropriate box.

- ☐ I request DEP calculate the review fee for my project and send me an invoice for the correct amount. I understand DEP's review of my project will not begin until DEP receives the correct review fee from me for the project.
- ☒ I have calculated the review fee for my project using the formula found below and the review fee guidance in the instructions. I have attached a check or money order in the amount of \$450.00 payable to "Commonwealth of PA, DEP". Include DEP code number on check. I understand DEP will not begin review of my project unless it receives the fee and determines the fee is correct. If the fee is incorrect, DEP will return my check or money order, send me an invoice for the correct amount. I understand DEP review will NOT begin until I have submitted the correct fee.
- ☐ I request to be exempt from the DEP planning module review fee because this planning module creates **only** one new lot and is the **only** lot subdivided from a parcel of land as that land existed on December 14, 1995. I realize that subdivision of a second lot from this parcel of land shall disqualify me from this review fee exemption. I am furnishing the following deed reference information in support of my fee exemption.

County Recorder of Deeds for \_\_\_\_\_ County, Pennsylvania

Deed Volume \_\_\_\_\_ Book Number \_\_\_\_\_

Page Number \_\_\_\_\_ Date Recorded \_\_\_\_\_



**R. REVIEW FEE** (continued)

Formula:

1. For a new collection system (with or without a Clean Streams Law Permit), a collection system extension, or individual tap-ins to an existing collection system use this formula.

$$\#9 \quad \text{Lots (or EDUs) X \$50.00} = \$ 450.00$$

The fee is based upon:

- The number of lots created or number of EDUs whichever is higher.
  - For community sewer system projects, one EDU is equal to a sewage flow of 400 gallons per day.
2. For a surface or subsurface discharge system, use the appropriate one of these formulae.

- A. A new surface discharge greater than 2000 gpd will use a flat fee:

\$ 1,500 per submittal (non-municipal)  
\$ 500 per submittal (municipal)

- B. An increase in an existing surface discharge will use:

$$\# \quad \text{Lots (or EDUs) X \$35.00} = \$$$

to a maximum of \$ 1,500 per submittal (non-municipal) or \$ 500 per submittal (municipal)

The fee is based upon:

- The number of lots created or number of EDUs whichever is higher.
- For community sewage system projects one EDU is equal to a sewage flow of 400 gallons per day.
- For non-single family residential projects, EDUs are calculated using projected population figures

- C. A sub-surface discharge system that requires a permit under The Clean Streams Law will use a flat fee:

\$ 1,500 per submittal (non-municipal)  
\$ 500 per submittal (municipal)





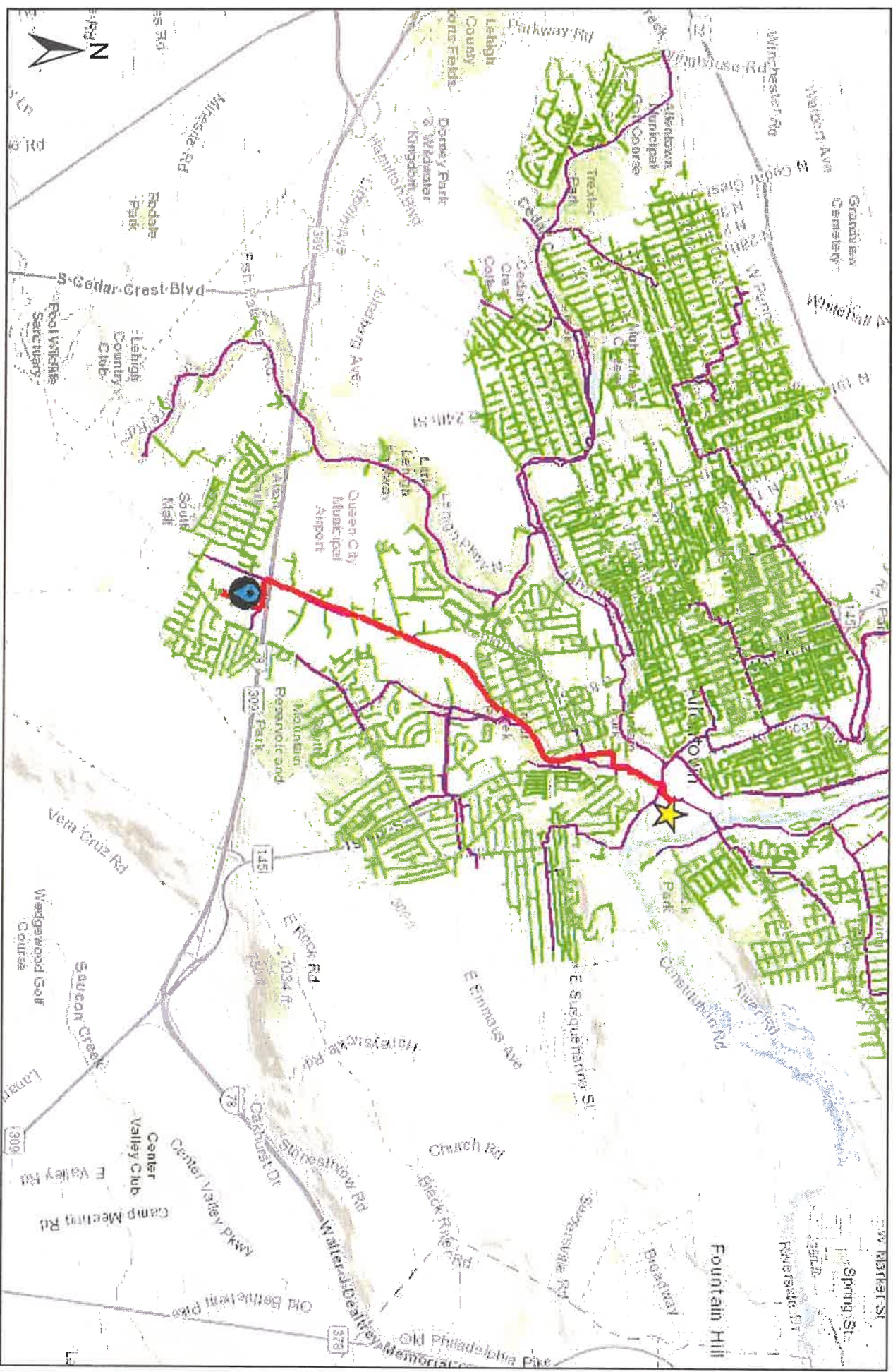








# Flow Map - 2843 Mitchell Ave



7/1/2020, 9:35:36 AM

- Legend
- ★ Kline's Island
  - WMTP
  - Sanitary Mains
  - Collector
  - Sanitary Main
  - Interceptor
  - Sanitary Main







**Lehigh County Authority**

1053 Spruce Road \* P.O. Box 3348 \* Allentown, PA 18106-0348  
(610) 398-2503 \* FAX (610) 398-8413 \* Email: [service@lehighcountyauthority.org](mailto:service@lehighcountyauthority.org)

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## LETTER OF TRANSMITTAL

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**Date:** July 2, 2020

**To:** Irene Woodward  
City of Allentown  
435 Hamilton Street  
Allentown, PA 18101

**Re:** Filmtech Mitchell Ave Site – 2843 Mitchell Ave  
Allentown, Lehigh County, PA

<u>No. of Copies</u>	<u>Date</u>	<u>Description</u>
1	7/2/20	Completed Sewer Planning Module
1	7/2/20	Plan Showing Path of Sewage to WWTP
1	7/2/20	Appendix A Cover Letter

☒ As Requested  
☐ For Your Information  
☐ For Your Comments  
☐ For Action By You

☐ Approved  
☐ Approved As Noted  
☐ Revise And Resubmit  
☐ For Your Files

**Comments:**

LCA has completed the Sewer Planning Module for the subject property. The hard copy will be sent to you in the mail. Please contact me if you have any questions.

**From:** Jacob Hunsicker  
**cc:** Scott Novatnak, DEP (via email)  
Robert Corby, DEP (via email)  
Craig Messinger, COA (via email)  
Phil DePoe, LCA (via email)  
Liesel Gross, LCA (via email)  
Adam Smith, Barry Isett & Associates, Inc. (via email)





**LEHIGH COUNTY AUTHORITY**

1053 SPRUCE ROAD \* P.O. BOX 3348 \* ALLENTOWN, PA 18106-0348  
610-398-2503 \* FAX 610-398-8413 \* [www.lehighcountyauthority.org](http://www.lehighcountyauthority.org)  
email: [service@lehighcountyauthority.org](mailto:service@lehighcountyauthority.org)

July 2, 2020

Irene Woodward  
Director of Planning  
City of Allentown  
435 Hamilton Street  
Allentown, PA 18101

RE: Filmtech Mitchell Ave Site – 2843 Mitchell Ave, City of Allentown  
Sewer Module - Chapter 94 Consistency Determination – Appendix A

Dear Mrs. Woodward:

This letter and approval for the attached Sewage Facilities Planning Module is based on the current estimate of available wastewater capacity. This letter does not promise, guarantee or assure any future conveyance or treatment allocation without compliance with all applicable rules and regulations, payment of all necessary fees and availability of the respective allocation at that time.

In accordance with the interim Corrective Action Plan and Connection Management Plan submitted to the Pa. Department of Environmental Protection by the Kline's Island Sewer System municipalities on December 31, 2019 and approved by DEP on January 17, 2020, an amount equal to the property or development's wastewater flow will be allocated from the Connection Management Plan at the time of approval of the Sewage Facilities Planning Module. This property or development's wastewater flow need, as represented in the attached Sewage Planning Module, is 3,340 gallons per day. Therefore, the Connection Management Plan balance will be adjusted as follows:

Connection Management Plan Allocation (gallons per day)	1,500,000
Previously allocated from prior planning module submissions	-665,658
This submission	-3,340
<b>Remaining Allocation in Connection Management Plan</b>	<b>831,002</b>

Please contact me if you have any questions about this information.

Sincerely,

Liesel M. Gross  
Chief Executive Officer

cc: Scott Novatnak, DEP  
Robert Corby, DEP  
Craig Messinger, COA  
Phil Depoe, LCA  
Adam Smith, Barry Isett & Associates, Inc.







COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

DEP Code #:  
2-39001231-3

**SEWAGE FACILITIES PLANNING MODULE**  
**COMPONENT 4A - MUNICIPAL PLANNING AGENCY REVIEW**

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

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

Project Name

Filmtech – Mitchell Avenue Site

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

1. Date plan received by municipal planning agency July 22, 2020

2. Date review completed by agency August 25, 2020

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

- | Yes                                 | No                                  |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Is there a municipal comprehensive plan adopted under the Municipalities Planning Code (53 P.S. 10101, <i>et seq.</i> )?                                  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 2. Is this proposal consistent with the comprehensive plan for land use?<br>If no, describe the inconsistencies _____  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Is this proposal consistent with the use, development, and protection of water resources?<br>If no, describe the inconsistencies _____                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 4. Is this proposal consistent with municipal land use planning relative to Prime Agricultural Land Preservation?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 5. Does this project propose encroachments, obstructions, or dams that will affect wetlands?<br>If yes, describe impacts _____                               |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 6. Will any known historical or archaeological resources be impacted by this project?<br>If yes, describe impacts _____                                      |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 7. Will any known endangered or threatened species of plant or animal be impacted by this project? <u>see PNOI results</u><br>If yes, describe impacts _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 8. Is there a municipal zoning ordinance?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 9. Is this proposal consistent with the ordinance?<br>If no, describe the inconsistencies _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 10. Does the proposal require a change or variance to an existing comprehensive plan or zoning ordinance?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 11. Have all applicable zoning approvals been obtained?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 12. Is there a municipal subdivision and land development ordinance?   |





**SECTION C. AGENCY REVIEW (continued)**

- | Yes                                 | No                                  |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 13. Is this proposal consistent with the ordinance?<br>If no, describe the inconsistencies _____   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 14. Is this plan consistent with the municipal Official Sewage Facilities Plan?<br>If no, describe the inconsistencies _____                               |
| <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?<br>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>                      |
| <input type="checkbox"/>            | <input type="checkbox"/>            | If yes, is the proposed waiver consistent with applicable ordinances?<br>If no, describe the inconsistencies _____   |

17. Name, title and signature of planning agency staff member completing this section:

Name: Irene WoodwardTitle: Director of Planning and ZoningSignature: [Signature]Date: 8/25/20Name of Municipal Planning Agency: City of AllentownAddress: 435 Hamilton St., Allentown, PA 18101Telephone Number: 610-437-7611**SECTION D. ADDITIONAL COMMENTS (See Section D of instructions)**

This component does not limit municipal 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 planning agency must complete this component within 60 days.

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

21



## Lehigh Valley Planning Commission

GREG ZEBROWSKI  
Chair

STEVEN GLICKMAN  
Vice Chair

PAMELA PEARSON  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

August 17, 2020

Mr. Philip Schiebel  
Barry Isett & Associates, Inc.  
85 South Route 100  
Allentown, PA 18106

**Re: Act 537 Review - Sewage Facilities Planning Module for the Filmtech – Mitchell Avenue Site Land Development in the City of Allentown, Lehigh County, DEP Code No. 2-39001231-3**

Dear Mr. Schiebel:

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 construction of a 69,990 square foot warehouse on approximately 7.4 acres. The development is proposed to be served by public sewage disposal, with ultimate treatment at the City of Allentown wastewater treatment plant. This sewage facilities planning module is consistent with *FutureLV: The Regional Plan*. According to *FutureLV*, the proposed project is located in an area designated for Development in the General Land Use Plan and aligns with the *FutureLV* action to 'promote development in areas with public sewer and water capacity' (under Policy 3.2).

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

Sincerely,

Susan L. Rockwell  
Senior Environmental Planner

Enclosure

cc: Irene Woodward, AICP, Director of Planning, City of Allentown  
Robert Corby, PA Department of Environmental Protection





## 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

Filmtech – Mitchell Avenue Site

### 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 August 13, 2020  
Agency name Lehigh Valley Planning Commission
3. Date review completed by agency August 17, 2020

### 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 checked="" type="checkbox"/> | <input type="checkbox"/>            | 2. Is this proposal consistent with the comprehensive plan for land use? <u>See attached MPC review letter dated 7/12/20</u>  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Does this proposal meet the goals and objectives of the plan?<br>If no, describe goals and objectives that are not met <u>                    - - -                    </u>  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 4. Is this proposal consistent with the use, development, and protection of water resources?<br>If no, describe inconsistency <u>                    - - -                    </u>  |
| <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?<br>If no, describe inconsistencies: <u>                    - - -                    </u> |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 6. Does this project propose encroachments, obstructions, or dams that will affect wetlands?<br>If yes, describe impact <u>                    - - -                    </u>  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 7. Will any known historical or archeological resources be impacted by this project? <u>PMMC determination</u><br>If yes, describe impacts <u>                    - - -                    </u>                                       |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 8. Will any known endangered or threatened species of plant or animal be impacted by the development project? <u>See PNDI results</u><br>If yes, describe impacts <u>                    - - -                    </u>                |
| <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? <u>N/A</u><br>If no, describe inconsistencies <u>                    - - -                    </u>  |



**SECTION C. AGENCY REVIEW (continued)**

Yes No

- ☐ ☐ 11. Have all applicable zoning approvals been obtained? *N/A*
- ☒ ☐ 12. Is there a county or areawide subdivision and land development ordinance? *Not applicable to the City of Allentown*
- ☐ ☐ 13. Does this proposal meet the requirements of the ordinance? *N/A*  
If no, describe which requirements are not met \_\_\_\_\_
- ☐ ☐ 14. Is this proposal consistent with the municipal Official Sewage Facilities Plan? *See municipal interpretation*  
If no, describe inconsistency \_\_\_\_\_
- ☐ ☒ 15. Are there any wastewater disposal needs in the area adjacent to this proposal that should be considered by the municipality?  
If yes, describe \_\_\_\_\_
- ☐ ☐ 16. Has a waiver of the sewage facilities planning requirements been requested for the residual tract of this subdivision? *N/A*  
☐ ☐ If yes, is the proposed waiver consistent with applicable ordinances.  
If no, describe the inconsistencies \_\_\_\_\_
- ☒ ☐ 17. Does the county have a stormwater management plan as required by the Stormwater Management Act?
- ☒ ☐ 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: Susan L. RockwellTitle: Senior Environmental PlannerSignature: S. L. RockwellDate: August 17, 2020Name of County or Areawide Planning Agency: Lehigh Valley Planning CommissionAddress: 961 Marcon Blvd., Suite 310, Allentown PA 18109Telephone Number: 610-264-4544**SECTION D. ADDITIONAL COMMENTS (See Section D of instructions)**

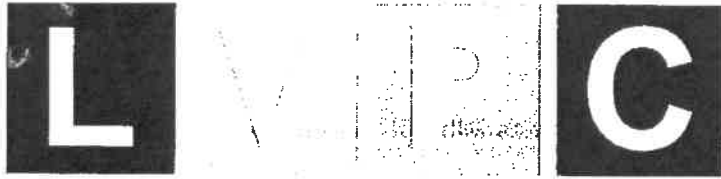
This component does not limit county planning agencies from making additional comments concerning the relevancy of the proposed plan to other plans or ordinances. If additional comments are needed, attach additional sheets.

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

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







## Lehigh Valley Planning Commission

GREG ZEBROWSKI  
Chair

STEVEN GLICKMAN  
Vice Chair

PAMELA PEARSON  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

July 17, 2020

Irene Woodward, AICP  
Director of Planning & Zoning  
City of Allentown  
435 Hamilton Street  
Allentown, PA 18101

**RE: Filmtech - Mitchell Avenue Site – Land Development  
City of Allentown  
Lehigh County**

Dear Ms. Woodward:

The subject application proposes to construct a 69,990-square-foot warehouse adjacent to an existing manufacturing facility. The project is located at 2843 Mitchell Avenue (parcel number 549574964649 and 549584493485). This proposal is generally consistent with *FutureLV: The Regional Plan* because it is located in an area designated for Development in the General Land Use Plan.

The LVPC offers the following additional comments:

### **Natural Resources**

The project site contains existing woodlands identified for Medium-Priority Preservation in the Natural Resources Plan. The LVPC commends the applicant for retaining much of the existing tree cover on the site, in support of preserving woodlands and the critical habitats they support (of Policy 3.1).

### **Economic Development**

The expansion of the existing Filmtech Corporation at the current location promotes development that complements the unique history of the Valley (Policy 5.4). The LVPC commends this growth and encourages 'reinvestment in commercial areas' (of Policy 4.6).

### **Job Accessibility**

The project location is highly walkable and is in close proximity to Lehigh and Northampton Transportation Authority (LANTA) transit service along Lehigh Street. The LVPC commends the applicant for including sidewalks along the Mitchell Avenue property frontage, providing for safe and secure community design (Policy 5.1). The expansion of the existing facility in this accessible location provides increased opportunities for job access, supporting the aim of *FutureLV* to improve equitable access to employment (of Policy 4.3).

The LVPC recommends inclusion of bicycle racks to 'enhance public transit service and pedestrian and bicycle infrastructure' (of Policy 2.3) and to improve equitable access to jobs

by means of improving 'mixed-transportation access to areas with high or growing employment opportunities' (of Policy 4.3).

#### **Roadway Infrastructure**

The LVPC recommends that the City and developer perform roadway improvements along the full extent of Mitchell Avenue, such as repaving and striping, to better accommodate vehicles and tractor-trailers utilizing the roadway. These improvements are critical to 'provide safe, well-maintained transportation network to move people and goods efficiently, while capitalizing on existing infrastructure' (Policy 2.2)

#### **Landscaping and Green Infrastructure**

The LVPC commends the inclusion of street trees and native plantings throughout the site, as these 'improve access to green spaces' and promote the physical and mental health of the community (of Policy 5.3).

Incorporating green infrastructure and sustainable building into the site design would further reduce the carbon footprint of the development by utilizing techniques such as a green roof, permeable pavements, and rainwater harvesting. These techniques 'reduce climate change impacts through mitigation and adaptation' (Policy 3.4). It is recommended that the applicant refer to the LVPC Green Infrastructure Guidelines, available at [lvpc.org](http://lvpc.org), for additional information about green infrastructure.

#### **Stormwater**

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

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

In order to better meet the needs of all involved, the LVPC requires an appointment for plan signings. Please call the office to schedule an appointment and ask for a Community Planning staff person. Generally, your appointment will be within two business days.

Feel free to call me if you have any questions about this review.

Sincerely,



Jillian Seitz  
Senior Community Planner

cc: Craig Messinger, City of Allentown Director of Public Works  
Adam A. Smith, PE, Barry Isett & Associates, Inc.  
Garrett Cook, Lehigh County Conservation District Engineer  
Geoff Reese, LVPC Director of Environmental Planning