



HanoverEngineering

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October 3, 2025

Mr. Mark Hudson, Township Manager
Hanover Township
Northampton County
3630 Jacksonville Road
Bethlehem, PA 18017-9302

RE: 90 Highland Avenue – Land Development
Amended Preliminary/Record Land
Development Plans
Jaindl Land Company
Received September 15, 2025
Hanover Project H24-23(A)

Dear Mark:

We have reviewed the above-referenced Preliminary/Record Land Development Plan submission for conformance to the Hanover Township Zoning Ordinance, Subdivision and Land Development Ordinance and other appropriate Ordinances as found in the code of the Township of Hanover, adopted February 12, 2020, as amended. We offer the following comments for the Township's consideration.

All planning issues are indicated by an asterisk (*).

A. GENERAL COMMENTS

1. This is the second submission and consists of a Land Development Plan, thirty-six (36) sheet Preliminary/Record Land Development Plan set for the approximately 9.74-acre site zoned Planned Industrial/Business Park District (PIBD).
2. The subject property is located at the northeast corner of the Bath Pike/Highland Avenue intersection and along the west side of Adler Place. The property is bordered on the north by a Dunkin Donuts/retail space building in the Service Commercial (C-1) District and an existing office building in the PIBD, on the west by Bath Pike (Route 512), on the east by Adler Place and on the south by Highland Avenue. The 90 Highland Avenue lot is currently under construction with driveway accesses along Highland Avenue and Adler Place. There still remains the existing 2-story, 15,928 square feet office building and associated parking lot with a full access driveway along Adler Place.
3. The Applicant for the above-referenced site proposes to amend the previously approved Jaindl Land Company development for a Wawa convenience store with 8-MDP gas canopy, a medical office building, and an office expansion. The office expansion and existing office building located in the northeasterly corner of the site are being removed, and this layout proposes a four-story, 123 room Limited Service Hotel and Motel with 149 parking spaces and related site amenities, including access driveways, lighting, landscaping, utilities and stormwater management facilities.
4. The site is located within the Planned Industrial/Business Park District (PIBD), and a Limited Service Hotel and Motel is a Conditional Use subject to Board of Supervisors

approval within this district. The applicant received Conditional Use approval on October 8, 2024 with conditions.

5. The proposed Wawa gasoline service is a special exception use within the PIBD. The Planning Commission previously reviewed and recommended approval of the special exception and associated variances at its May 4, 2020 meeting. The Zoning Hearing Board approved the special exception use and several variances regarding the lot distance from a zoning district boundary, the number of access points, the lot size, the number of fueling stations and diesel fueling stations per its Decision, dated October 20, 2020.

B. ZONING ORDINANCE – CHAPTER 185

Section 185-14 – The Applicant shall verify the site data and parcel ID reflect the recently recorded Lot Consolidation Plan.

Section 185-14.A.(1) – A minimum required lot or open space size for one building or structure shall not be used as any part of a required lot or yard for a second structure, except as may be approved by the Board of Supervisors during site or land development plan review. The Applicant proposes a total of three (3) uses on the lot (Wawa convenience store with gas pumps, medical office building, and the hotel).

- * Sections 185-14.C.(3), E and G – No buildings or structures shall be placed between the setback line and the existing or proposed road, street or highway right-of-way line and the required yard except lamp posts, driveways, mail boxes, sidewalks and utility lines, or such incidental items as may be agreed to by the Board of Supervisors during the site or land development plan review. The Applicant proposes parking spaces, parking lot access aisles, a trash enclosure, underground fuel tanks, stormwater management basins within the street classification and/or front yard setbacks.

Section 185-17.A.(1) – The Plans note to reference Plans prepared by Benchmark Civil Engineering Services for all work within the PennDOT and Township rights-of-way. The Land Development Plans shall be updated, as necessary, for consistency with the Benchmark Plans.

Sections 185-17.A and 185-18.A – The proposed turning templates indicate multiple areas of encroachment into opposing lanes or over features for both internal and external circulation and do not include all maneuvers for all uses and vehicles. The layout shall be updated to provide proper and safe access/circulation for the largest anticipated vehicles. The Applicant shall verify that the largest vehicle is utilized for turning maneuvers.

- * Section 185-17. F – All parking areas of more than twenty-five (25) spaces shall be landscaped subject to approval of the Board of Supervisors.

Section 185-17.G. – Proposed shared parking areas shall be tabulated and identified on the Plan or the Applicant shall verify shared parking is not utilized and update site data/notes.

Section 185-17.G.(3) – The Township Board of Supervisors shall determine the acceptability of the proposed 10% parking reduction if utilized.

Section 185-17.G.(5) – A covenant or other agreement for shared parking (if utilized) shall be submitted for approval by the Board of Supervisors. This covenant or agreement must be recorded with the Recorder of Deeds of Northampton County, Pennsylvania, as a deed restriction of all affected properties and cannot be modified or revoked without the consent of the Board of Supervisors.

Section 185-21.B.(4) – The Applicant shall obtain a permit required under Act No. 1998-15, known as the “Combustible and Flammable Liquids Act” for the proposed Wawa fuel pumps.

- * Section 185-22.E – The Applicant shall clarify how the previous Adler Place intersection improvements deferral is being handled with this application to the satisfaction of the Township.

C. SUBDIVISION AND LAND DEVELOPMENT ORDINANCE – CHAPTER 159

Sections 159-11.W and 159-24 – The Applicant shall coordinate the entity responsible for the street light electricity costs with the Township.

Section 159-12.B – The Township Solicitor shall determine the acceptability of the proposed Blanket Stormwater Easement note on Sheet 1, and, if applicable, the Owner shall sign the Blanket Stormwater Easement note.

- * Section 159-13.B – Sidewalks are required along the Bath Pike frontage. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**
- * Section 159-13.C.(1) – Sidewalks shall be located within the street right-of-way, and no closer than one foot from the right-of-way line. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

The Applicant shall verify the proposed variable width public access easement for the proposed sidewalk located on private property was recorded with the prior land development plans.

- * Sections 159-15.I.(1), 73-4.D, 73-5, 73-6.D, 73-7.D and 73-7.G – The following comments regarding the proposed driveways shall be satisfactorily addressed:
 - a. The Applicant shall obtain a PennDOT Highway Occupancy Permit (HOP) for the proposed driveway along Bath Pike. The Township shall be copied on all submissions to and correspondence with PennDOT.
 - b. Commercial driveway curb radii shall be a 55 feet maximum. The proposed right-in driveway along Highland Avenue has 60.5 feet and 79.5 feet radii. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

Section 159-16.D – The Applicant will be required to meet the Township Recreation and Open Space Area requirements. The Township shall verify if the prior land development fees were paid and determine if additional fees are required.

Section 159-17.A – The applicant shall address any comments from the Shade Tree Advisory Board.

- * Section 159-17.C.(4) – The following comments regarding the proposed street trees shall be satisfactorily addressed:

1. The spacing of the street trees may vary from 50 feet to 75 feet on center, but the average spacing shall be 65 feet or less. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**
2. All street trees shall be planted two (2) to four (4) feet outside the street right-of-way, in the required planting easement on private property. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

- * Section 159-17.F – The Developer shall provide and install one (1) shade tree for every existing tree or shade tree removed from the Developer's land. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

Sections 159-21.A and 159-29.D.(8) – The Applicant shall satisfactorily address any comments from the City of Bethlehem Water Department.

Sections 159-28.B and 159-29.D.(14) – No parking fire zones shall be provided to the satisfaction of the Township Fire Marshall. The Applicant shall satisfactorily address any comments from the Township Fire Marshall.

- * Section 159-29.C.(1) – All existing features within 200 feet of any part of the property shall be identified in the plan views. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.** (It is noted the existing features plan is from the previous land development plan prior to site demolition.)
- * Sections 159-29.C.(3) and 159-29.C.(6)(a) – The species and trunk diameter (4 ½ feet above grade) of all existing trees and shade trees on the property shall be identified. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

Sections 159-29.E.(2) and 159-30.D.(1) – The Applicant shall provide a copy of the DEP approved Planning Module.

Sections 159-29.F(1) and 159-30.E.(2) – The Owner(s) shall sign the Owner's Certification(s).

Sections 159-29.F.(2) and 159-30.E.(1) – The design professionals shall sign and seal the Engineer's and Surveyor's Certifications.

Sections 159-29.F.(7) and 159-30.E.(5) – The owner shall sign the Dedication note.

Sections 159-29.F.(8) and 159-30.D.(2) – The Applicant shall provide copies of all Highway Occupancy Permit (HOP) submissions to PennDOT, along with any corresponding review and approval correspondence, to the Township and our office.

Section 159-30.C.(6) – The proposed Wawa lease agreement and any other proposed restrictions and/or property ownership and maintenance agreements in the deed affecting the subdivision of the property shall be submitted for review by the Township Solicitor.

Section 159-30.D.(4) – The Applicant shall provide review and approval letters from the City of Bethlehem for the proposed sanitary sewer and water line connections.

Sections 159-30.D.(5) and 159-36.F.(1) – The Applicant shall execute an Improvements Agreement and provide financial security for the proposed improvements.

Sections 159-30.D.(6), 159-36.F.(2) and 159-38 – The Applicant shall execute a Maintenance Agreement for any proposed improvements offered for dedication and located within the Township right-of-way.

Sections 159-30.E.(9) and 159-36.I – Any deeds of dedication for road/street rights-of-way shall be provided. Additionally, a legal description and plot plan of any rights-of-way offered for dedication to the Township shall be provided for inclusion in the deed of dedication.

- * Section 159-34 – Preliminary Plan approval is required prior to submission of a Record Plan. The Applicant proposes a combined Preliminary/Record Plan submission. **The Applicant was granted a waiver of this requirement at the February 8, 2022 Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

Section 159-40.G – The Owner shall sign and notarize the Owner's Acknowledgement.

Section 159-44 – Upon approval by the Board of Supervisors, a note shall be added to the Plan listing any conditions and the meeting date of the Board of Supervisors action.

**D. STORMWATER MANAGEMENT ORDINANCE – CHAPTER 152,
ORDINANCE NO. 19-1**

Sections 152-6.1.C and 152-16.D – A DEP NPDES stormwater discharges associated with construction activities permit is required for regulated earth disturbance activities of one acre or greater under PA Code Chapter 92.

Sections 152-6.2.A.(5) and 152-11.G.(2) – PennDOT approval is required for the proposed stormwater management improvements and proposed connections to the existing storm sewer system within the PennDOT right-of-way and a Permit from PennDOT indicating such approval shall be directed to the Township. The applicant will be responsible for any maintenance associated with these permits in perpetuity.

Sections 152-8.L – POI #2 (Route 512) on the Allowable Release Rate Worksheet does not meet the release rate requirements for the 10-year storm frequency.

Section 152-10.E – The Owner shall provide a notarized statement, satisfactory to the Township Solicitor, stating the Township shall be held harmless against any claim of damage from the downstream property owners that may result from the proposed development.

Section 152-10.I.(7) – The depths of detained runoff in the existing surface detention basin proposed to be modified exceeds the maximum allowable depths of this Section, and the interior side slopes shall not be steeper than a ratio of 5 horizontal to 1 vertical. **The Applicant was granted a waiver of this requirement at the February 8, 2022, Board of Supervisors meeting. The Applicant is requesting a waiver from this requirement again.**

Section 152-10.M – The Developer shall provide a covenant running with the land to identify the property owner's responsibilities for the ownership and maintenance of the private stormwater collection, conveyance, control and BMP facilities.

Section 152-15.D – The owner shall sign the BMP Statement on the Cover Sheet.

Section 152-16.A.(4) – A copy of the Lehigh Valley Planning Commission (LVPC) stormwater management consistency letter shall be provided.

Section 152-24.3 – The property owner shall sign a Declaration of Covenant and Agreement for Maintenance of Stormwater Management Facilities and BMP(s) (the "Maintenance Agreement") with the Township covering all stormwater BMPs that are to be privately owned. The Maintenance Agreement shall be substantially the same as the agreement in Appendix E of this Chapter. Other items may be included in the Maintenance Agreement where determined by the Township to be reasonable or necessary to guarantee the satisfactory operations and maintenance of all permanent stormwater BMPs. The Maintenance Agreement shall be subject to the review and approval of the Township.

Section 152-24.5 - The Owner/Developer of any land upon which permanent BMPs will be placed, constructed or implemented as described in the BMP operations and maintenance plan, shall record the following documents in the Office of the Recorder of Deeds for Northampton County, as applicable, within ninety (90) days of approval of the BMP operations and maintenance plan by the Township: the Operations and Maintenance Plan or a summary thereof and Maintenance Agreements under Section 152-24.3 of this Chapter.

Section 152-24.6 – The Applicant shall pay \$5,000.00 into the Township Stormwater BMP Operations and Maintenance Fund, as noted in Requirement #6 of the Declaration of Covenant, Agreement and Easement for Maintenance of Stormwater Management Facilities.

E. IMPACT FEE – CHAPTER 102

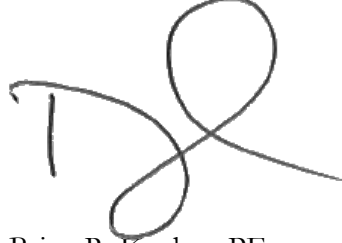
The Traffic Impact Fee (\$343.00/per PM peak hour trip) shall be calculated upon Township concurrence with the Applicant's trip generation analysis. The Applicant shall be responsible for any difference from the prior land development plan/agreements.

F. GENERAL COMMENTS

- INLA6.1.1 to INLA6.1 shows a 15" pipe on the profile and an 18" pipe in the storm report. Please clarify.
- The storm sewer line from INLB8 to INLB7 does not appear to be consistent between the plans and the storm report. Please check and revise as necessary.
- The storm report table of contents should be updated to reflect the new page numbers.
- The storm system layout in the report shall be revised to reflect the changes to the roof leaders coming from the hotel.
- Please clarify whether or not there is a gas connection to the proposed hotel. There does not appear to be one present on the utility plan.
- The applicant shall provide verification that any prior outside agency approvals are still valid for the amended proposal.
- The plan preparer shall contact our office to discuss miscellaneous drafting comments.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully,
HANOVER ENGINEERING



Brien R. Kocher, PE
Township Engineer

brk:jam/jcn/jlw2

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Enclosure(s)

cc: Hanover Township Board of Supervisors
Hanover Township Planning Commission (via email)
Ms. Tracy Luisser, Zoning Administrator (via email)
James L. Broughal, Esquire (via email)
Mr. Luke Jaindl, Jaindl Land Company (via email)
Mr. Jeffrey Beavan, PE, Bohler Engineering (via email)