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RECEIVED  
COMMUNITY DEVELOPMENT

Submission Date: 4/21/24 Appeal Number: ZHB-2024-04 APR 21 2026

Fee Paid: \$1,000 Receipt Number: \_\_\_\_\_ Meeting Date: 5/27/24 SOUTH WHITEHALL TOWNSHIP



## ZONING HEARING BOARD NOTICE OF APPEAL

PROPERTY ADDRESS: 4668 Crackersport Rd, Allentown, PA 18104 APPLICATION DATE: April 20, 2026

APPLICANT: Crackersport Racquetball, L.P.

APPLICANT ADDRESS: 1177 Sixth Street, Whitehall, PA 18052

APPLICANT TELEPHONE: 610-403-3400 APPLICANT EMAIL: abe7777@icloud.com

PROPERTY OWNER'S NAME: Crackersport Racquetball, L.P.


PROPERTY OWNER'S ADDRESS: 1177 Sixth Street, Whitehall, PA 18052

OWNER'S TELEPHONE: 610-403-3400 OWNER'S EMAIL: abe7777@icloud.com

APPLICANT'S RELATIONSHIP TO OWNER: Same as Owner

**PROPERTY OWNER'S CERTIFICATION AND AUTHORIZATION:**

I hereby certify that I am the owner of the subject property and authorize the applicant named herein to make application and testify before the South Whitehall Township Zoning Hearing Board.

OWNER'S PRINTED NAME: Crackersport Racquetball, L.P.  
by Abraham R. Atiyeh SIGNATURE: 

SECTION	TYPE OF REQUEST*	DESCRIPTION
see addendum	see addendum	see attached addendum

\*Variance, Special Exception, Conditional Use, Temporary Use, or Favorable Interpretation



**ZONING HEARING BOARD  
SOUTH WHITEHALL TOWNSHIP  
LEHIGH COUNTY, PENNSYLVANIA**

**NOTICE OF APPEAL**

Please answer the following questions which apply to your appeal. The purpose of this information form is to assist both you and the Zoning Hearing Board in the quick and efficient review of your application. Please type or print clearly.

1. What is the full name and mailing address of the owner(s) of the property that is the subject of this appeal? **Please attach a copy of the current Lehigh County Property Assessment record.** (Available online at [www.lehighcounty.org/departments/assessments](http://www.lehighcounty.org/departments/assessments)).

NAME: Crackersport Racquetball, L.P.

ADDRESS: 1177 Sixth Street, Whitehall, PA 18052

2. If the applicant is other than the owner(s), what is the full name and mailing address of the applicant, and the specific interest of the applicant in the subject property (e.g., equitable owner under a signed Agreement of Sale, lessee under a signed Lease Agreement with authorization from the landowner, holder of an Option or contract to purchase, authorized agent for owner, etc.). Please attach written proof of interest, or a written statement signed by the property owner(s) giving you authorization to present the property owner's interests before the Zoning Hearing Board.

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

INTEREST: \_\_\_\_\_

3. What is the exact location of the property in question? Please include the county parcel identification number.

LOCATION: 5476 5827 5036-6 & 5476 4892 0576-1  
conveyed in same deed

4. Has any previous application or appeal been filed in connection with the subject property? YES  NO

If YES, please list the name and appeal number under which it was filed:

NAME: Crackersport Racquetball, L.P. by Abraham Atiyeh, Manager

APPEAL: DOCKET NO. ZHB-2020-05

5. What was the date of the acquisition of the subject property by the owner(s)?

DATE: September 2015

6. What are the exact dimensions of the property (i.e. the length of the front, sides and rear property lines)?

DIMENSIONS: Irregular Lot, See Site Plan.

7. What is the square footage of the property?

SQUARE FOOTAGE: 606,533.93 SF

8. Please describe the dimensions (height, width, and depth) and the type of construction (materials used) for the proposed building or structure.

DIMENSIONS: See Attached Plan

TYPE OF CONSTRUCTION: Steel Supporting Frame with Composite Sign Board Attached at top 13'-4", Digital Message Board at bottom 6'-8" (33%)

9. What is the specific nature of the present use being made of the property?

PRESENT USE: Senior Living Center

10. What is the approximate cost of the work involved?

COST: \$10,000 pylon sign

11. Upon what grounds do you base this appeal?

A.  Temporary Use. A Temporary Use is a certain use or activity which is not otherwise permitted in the Zoning Ordinance but its establishment and operation for a limited period of time would serve the public interest. The Zoning Hearing Board may approve a Temporary Uses if the use does not detrimentally affect the use of neighboring properties, and the use will materially contribute to the general welfare, needs and convenience of the Township, and the specific dates of the use, in the judgment of the Zoning Board, serve the intended purpose.

B.  Special Exception Use. A Special Exception Use is a specific use, shown as a Special Exception Use in the Zoning District Schedule, which is permitted upon the approval by the Zoning Hearing Board if the Board finds that the use is generally not detrimental to the neighborhood and that the minimum standards specified for the use are proposed. The Board can attach any reasonable conditions it deems appropriate.

C.  Variances. A variance to the Zoning Ordinance is required when a proposed use or structure does not meet all of the requirements placed on it by the Ordinance. The Zoning Hearing Board may grant a variance when the applicant demonstrates that the variance will not be contrary to the public interest and where, owing to unique conditions of the land, a literal enforcement of the provisions of the Ordinance will result in an unnecessary hardship. Such hardships occur only where circumstances affecting the land are unique and applicable to that land alone. If there is a general hardship, the situation should be remedied by a revision of the general Zoning Ordinance and not by the grant of a variance.

**NOTE: If your request is a Temporary Use or a Special Exception Use, please use the space**



ANSWER QUESTIONS NUMBERS 12 THRU 22 FOR VARIANCE REQUEST

12. Are there unique physical circumstances or conditions including irregularity, narrowness, or shallowness of the lot's size or shape, or exceptional topographical or other physical conditions peculiar to the subject property?

CONDITION: Large Senior Living Campus, Distance from Highway, Traveling Velocity of passing motorists. SEE ADDENDUM FOR EACH VARIANCE REQUESTED.

13. Do the conditions stated in question number 13 prevent the possibility that the property can be developed within strict conformity of the Zoning Ordinance?

YES:  \_\_\_\_\_  
\_\_\_\_\_

NO:  \_\_\_\_\_

14. Has this hardship been created by the applicant?

YES:  \_\_\_\_\_

NO:  \_\_\_\_\_  
\_\_\_\_\_

15. Will the character of the neighborhood be altered by the granting of this variance?

YES:  \_\_\_\_\_  
\_\_\_\_\_

NO:  \_\_\_\_\_

16. Is the requested variance the minimum variance needed to afford relief from the Zoning Ordinance?

YES:  \_\_\_\_\_

NO:  \_\_\_\_\_

17. Is the proposed use of the property permitted in the Zoning District it is located within?

YES:  \_\_\_\_\_

NO:  \_\_\_\_\_

18. Will the specific intended use of the premises generate any nuisance characteristics such as noise, dust, odor, etc.?

YES:  \_\_\_\_\_  
\_\_\_\_\_

NO:  \_\_\_\_\_

19. How many employees will be employed and what are the hours of operation (if applicable)?

EMPLOYEES: Undetermined

HOURS: 24 hours per day, 7 days per week

20. What landscape/buffer is planned, if any?

Not Applicable

21. What are the characteristics of the structures and uses on properties abutting the subject premises (e.g. single family residential dwelling, Church, etc.)?

ABUTTING STRUCTURES: Daniels BMW & Mini Cooper Car Dealership to the East, US Route 22 to the South, Commercial to the North, Undeveloped Land to the West with interspersed residential dwellings to the west.

22. What type of water and sewerage facilities are available on the property?

Public Sewer and Water

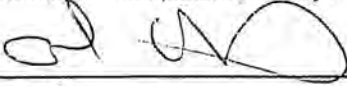
NOTE: PLEASE ATTACH THE FOLLOWING DOCUMENTS WITH YOUR NOTICE OF APPEAL APPLICATION. FAILURE TO ATTACH THE REQUIRED DOCUMENTS WILL RESULT IN A DELAY IN THE CONSIDERATION AND DISPOSITION OF YOUR APPLICATION BY THE ZONING HEARING BOARD:

- 1. 10 Copies of the completed Zoning Appeal Application ✓
- 2. 10 Sets of Supporting Documentation, including: ✓
  - a. Applicable site/construction plans ✓
  - b. Letter of Intent/Project Narrative/Description of Work ✓
  - c. A Plot Plan/Location Map of the subject property. The Plot Plan must: ✓
    - (i) Be drawn to scale; ✓
    - (ii) Show the North Point; ✓
    - (iii) Show all property lines; ✓
    - (iv) Show the location of the buildings and structures on the property (both existing and proposed); and ✓
    - (v) Show the distances to property lines of all proposed improvements. ✓
  - d. Applicable construction documents
  - e. Copy of the current Lehigh County Property Assessment record. (You may attach a copy of your current Deed instead of, or in addition to, the Lehigh County Property Assessment record). ✓
  - f. If the applicant is other than the property owner, written proof of interest, or a written statement signed by the owner(s) of the property giving you authorization to present the property owner's interests before the Zoning Hearing Board. ✓
- 7. If applicable, completed copies of the Escrow and Reimbursement Agreement, the Required Escrow Account Opening Information form and the W-9 Form (attached). ✓

**The Applicant or other person of legal standing must attend the hearing.**

I HEREBY CERTIFY THAT ALL OF THE ABOVE STATEMENTS, AND THE STATEMENTS CONTAINED IN ANY ATTACHMENTS SUBMITTED HERewith, ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Crackersport Racquetball, L.P. by Abraham R. Atiyeh

  
(Signature)

Crackersport Racquetball, L.P. by Abraham R. Atiyeh  
(Printed Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Date of Submission)

\_\_\_\_\_  
(Telephone Number)



# GOUCK ARCHITECTS

Stewart J. Gouck, AIA  
Registered Architect

**Zoning Variance Application Addendum for:  
Parkland Manor Senior Living Care  
4668 Crackersport Road  
Allentown, PA 18104  
South Whitehall Township, PA**

**Zoning Variance Application Addendum:**

*Zoning Ordinance Section, Type of Request, Description:*

*State the basis for the appeal: (Please include the grounds for appeal, with respect to law and fact to grant the appeal, Special Exception, or Variance, and if a legal hardship is claimed, state the specific hardship).*

**ROUTE 22 PYLON SIGN SETBACK VARIANCE-100 FT REQUIRED, 33 FEET  
PROPOSED:**

**350-48(s)(10)(E)(vii)(d)** "No sign shall be located within 100 feet of the right-of-way line of a limited access highway such as . . . Route 22 . . . except as follows:" [no exceptions apply]

Variance requested for a 33 foot setback from the right-of-way line of the limited access highway Route 22. The signage, if it were spaced 100 feet from the right-of-way line of the limited access highway, would be barely visible, especially for vehicles traveling at highway velocity of 55 miles per hour. Small signage placed at too great a distance from the highway travel lanes creates a hazard for motorists, who must strain to see or read the signage, thus distracting drivers' attention from the road.

In the area of the Proposed Sign, the Route 22 Right of Way widens in front of our site to accommodate the westbound On-Ramp from Route 309 Southbound. The typical Route 22 Right-of-way width is (120 feet total) or 60 feet from the median to the property line, which you can see on the site plan just to the west of our site. However, at our site, the Route 22 right-of-way dimension from the median to our property line at our proposed pylon sign is widened to 111.5 feet. That means our signage is already set back an additional 51.5 feet from the travel lanes. The extra width of the Route 22 Right-of-way in front of our site is a physical circumstance or condition that is unique to our site and creates a hardship, since the extra right-of-way width already pushes our signage farther back from the travel lanes, making it much more difficult to see from the highway.

Note that a 100 foot sign setback would locate the pylon sign hidden behind the cell phone tower or in the middle of our reserve parking lot. If we set back our sign 100 feet

from the right-of-way, it would be 211.5 feet from the median. This distance is much too far for a sign to be seen or read from the highway, especially at highway speeds of 55 mph, which would cause the Sign to fail its intended purpose, and also has the possibility of causing persons westbound on Route 22 to look outside their field of vision to view the Sign message.

The distance from Route 22 median and travel lanes is consistent with other neighboring signage, including off-premises billboard advertisements.

### **ROUTE 22 SECOND PYLON SIGN VARIANCE:**

**350-48(s)(10)(E)(xii)(a)** "Coordinated Development Pylon Signs. Coordinated Developments shall be permitted one Pylon Sign. . ."

We request a variance for a second Pylon sign, of 20'x20' = 400 square feet in size.

Hardship: Our Coordinated Development consists of two primary and distinct groups of uses, each of which serve the community and can be displayed together in harmony with other signage along Route 22 westbound in that area.

The "Recreation" use [350-48(r)(3)] including St. Luke's Sportsplex, also known as Parkland Pickleball, makes full use of the existing 20'x20' pylon sign on the easterly part of the Route 22 frontage of the site. Its large indoor and outdoor space and commitment to well-being and the sport of Pickleball and related events have required that entire Sign. Practical considerations for St. Lukes to maintain its own identity also prevent a shared Signage as is usual for "shopping center" coordinated developments.

The other use is Parkland Manor, located on a different portion of the Coordinated Development site to the west of Sportsplex, and north of the Route 22 border. This second group of uses for the "Retirement Facility" [350-48(r)(10)] is largely hidden behind the Sportsplex domes, the cell-tower and trees from Route 22, and requires its own pylon sign to provide exposure to Route 22 for those seeking to visit as well as for those whose family needs will include Senior Residential Care in South Whitehall Township.

The placement of Parkland Manor's senior housing makes the Requested Sign a more reasonable and effective display of this Senior Facility than using Building Face Signs or other directly attached signs, since such placement would present a poor viewing angle.

We have considered placing a conforming Building Face Sign on the east elevation of Parkland Manor, following the zoning requirements for Building Face Signs per 350-48(s)(10)(E)(xii).

The variance is needed since the permitted on-building sign is impractical for the Parkland Manor building whose entire easterly elevation consists of windows and french

doors in this single story "low slung" building. The lack of height does not provide the necessary elevation required to achieve visibility from Route 22. There is no location on the building where we can reasonably place the permitted building face sign. Furthermore, that building face is located over 303 feet from the Route 22 median and it is hidden behind trees and a cell phone tower.

The proposed use would be the minimum variance to create a self-standing sign in lieu of an ineffective building face sign. Since a conforming building face sign will not be effective or achieve the intent of Signage under the law, we are requesting relief to construct a second pylon sign for the "other user" of the coordinated development, namely Parkland Manor. The requested pylon sign is located 462.3 feet west of the existing St. Lukes pylon sign and at approximately the same distance from the median of Route 22.

The proposed Pylon sign is also requested and believed entitled to a variance because the lot is, essentially, backwards in that the entry and exit are from the northern border along Crackersport Road, which is much more of a destination driveway to the businesses along it and Hausman Road than a typical volume Township Roadway.

The proposed sign on Route 22 is consistent with the others along Route 309 South and Route 22 West where the primary visibility and signage is to their rear border, which is the window for these lots to Route 22 (or 309, as applicable).

### **ROUTE 22 PYLON SIGN AREA VARIANCE**

**350-48(s)(10)(E)(xii)(a)(1)** Sign area. The pylon sign shall not exceed 200 square feet.

### **Alternate #1: Favorable Interpretation of V-shaped Sign Area, and Accompanying Area Variance:**

We request a favorable interpretation of [Section 350-05\(d\)](#) Definition of Terms, "SIGN FACE", and [Section 350-48\(s\)\(10\)\(E\)\(v\)](#) "Measurement of Area":

[Section 350-05\(d\)](#) Definition of Terms, "SIGN FACE – A single surface area to which the Sign copy is affixed or from which the copy or message is displayed or illustrated, not including structural supports, architectural features of a Building or Sign Structure, nonstructural or decorative trim."

Section 350-48(s)(10)(E)(v) "Measurement of Area. . . In computing the area of a double-face Sign, only one side shall be considered provided both faces are identical. If they are not identical, the larger side shall be used."

Based upon this definition of "Measurement of Area", since both sides of our V-shaped double-face sign are identical in size and advertising content, only one side shall be considered in computing the area. Therefore, we request a favorable interpretation that our V-shaped double-faced Pylon sign with (2) 20'x20' faces is 400 square feet in area. After all, our double-faced V-shaped sign as drawn, with such a narrow angle between the panels, appears to be a 20'x20' sign in profile from each direction, so it should be considered a 400 square foot sign. Consequent to the granting of this favorable interpretation, we request an area variance for 400 square feet sign area provided, when 200 square feet maximum sign area is permitted by 350-48(s)(10)(E)(xii)(a)(1).

The additional sign area to permit a 400 square foot sign is necessary because the reduced-size permitted 200 square-foot signage is barely visible when viewed from the limited access highway Route 22, especially for vehicles traveling at highway velocity of 55 miles per hour. Small signage placed at too great a distance from the highway travel lanes creates a hazard for motorists, who must strain to see or read the signage, thus distracting drivers' attention from the road. The V-shaped sign is necessary so the sign is turned at the proper viewing angle for both westbound and eastbound traffic, especially considering the separation of the Route 22 travel lanes from the front of our site. A back-to-back sign would not be readable for eastbound traffic looking at an angle across the median.

### **Alternate #2: Pylon Sign Area Variance:**

In the event the board does not grant the Favorable Interpretation regarding calculation of sign area, we request an area variance for two Pylon Sign Faces of 400 square feet each provided, when one Pylon sign of 200 square feet maximum is permitted by 350-48(s)(10)(E)(xii)(a)(1).

The additional sign area to permit a Pylon sign with two 400 square foot sign faces is necessary because the reduced-size permitted 200 square-foot signage is barely visible when viewed from the limited access highway Route 22, especially for vehicles traveling at highway velocity of 55 miles per hour. Small signage placed at too great a distance from the highway travel lanes creates a hazard for motorists, who must strain to see or read the signage, thus distracting drivers' attention from the road. The V-shaped sign is necessary so the sign is turned at the proper viewing angle for both westbound and eastbound traffic, especially considering the separation of the Route 22 travel lanes from the front of our site. A back-to-back sign would not be readable for eastbound traffic looking at an angle across the median.

## **ELECTRONIC GRAPHIC DISPLAY VARIANCE FOR PYLON SIGN TYPE:**

We request a variance to incorporate an electronic graphic display on the Parkland Manor Pylon sign, rather than on a Monumental Entrance Sign as is permitted by the requirements of **350-48(s)(10)(E)(xii)(i)**. Our proposed electronic graphic display will follow all of the other requirements of this zoning section, with the bottom 33% or 6'-8" of our pylon sign being an electronic graphic display, and the top 67% or 13'-4" of the pylon sign being a static copy sign.

Hardship: There is very little traffic or exposure on Crackersport Road, where the driveway entrances to Parkland Manor are located, and where the ordinance permits an electronic graphic display on a Monumental Entrance Sign. This is because Crackersport Road was bisected and made discontinuous without an underpass or overpass when the Route 22 & 309 cloverleaf intersection was constructed. Westbound traffic on Crackersport Road is detoured 4/10 mile north on Bulldog Drive, it crosses Route 309 at the stoplight on Ridgeview Drive, and then it detours south again 4/10 mile on Hausman Road before traffic continues westerly on Crackersport Road along Parkland Manor's north property line, where its driveway entrance is located. Parkland Manor needs electronic digital display exposure to highlight events at the Senior Living Facility, as well as to advertise specials to keep its rooms occupied and keep the business viable. This electronic graphic display will only be effective along the Route 22 frontage of the property.

In summary, this tract and its neighbors have their "window to the world" not toward the low traffic roadway in the front, but to the Limited Access highway to the rear. Similar signage is in place in the commercial uses along Hausman Road and Crackersport Road in the vicinity of the coordinated development.

## **ZONING HEARING BOARD SOUTH WHITEHALL TOWNSHIP LEHIGH COUNTY, PENNSYLVANIA**

### **NOTICE OF APPEAL**

12. Are there unique physical circumstances or conditions, including irregularity, narrowness, or shallowness of the lot's size or shape, or exceptional topographical or other physical conditions peculiar to the subject property?

Condition:

The Route 22 Right of Way widens in front of our site to accommodate the westbound On-Ramp from Route 309. The typical Route 22 Right-of-way width is *(120 feet total)* or 60 feet from the median to the property line, which you can see on the site plan just to

the west of our site. However, at our site, the Route 22 right-of-way dimension from the median to our property line at our proposed pylon sign is widened to 111.5 feet. That means our signage is already set back an additional 51.5 feet from the travel lanes. The extra width of the Route 22 Right-of-way in front of our site is a physical circumstance or condition that is unique to our site and creates a hardship, since the extra right-of-way width already pushes our signage farther back from the travel lanes, making it much more difficult to see from the highway.

As discussed with each variance request above, we have considered installing a permitted Building Face Sign on the Parkland Manor building, however, the entire east-facing elevation of that building is composed of windows and french doors, making it impossible to install the signage type which is permitted by the zoning ordinance. Furthermore, that building face is located over 303 feet from the Route 22 median and it is hidden behind trees and a cell phone tower. Consequently, since a conforming building face sign will not be effective, we are requesting relief to construct a second Parkland Manor pylon sign.

For the Coordinated Development Pylon sign variances along Route 22, our Retirement Facility Coordinated Development is a large Senior Living Campus. The reduced-size signage, spaced 100 feet from the right-of-way line of the limited access highway, is barely visible, especially for vehicles traveling at highway velocity of 55 miles per hour. Small signage placed at too great a distance from the highway travel lanes creates a hazard for motorists, who must strain to see or read the signage, thus distracting drivers' attention from the road.

Finally, There is very little traffic or exposure on Crackersport Road, where the driveway entrance to Parkland Manor is located, and where the ordinance permits an electronic graphic display on a Monumental Entrance Sign. This is because Crackersport Road was bisected and made discontinuous without an underpass or overpass when the Route 22 & 309 cloverleaf intersection was constructed. Westbound traffic on Crackersport Road is detoured 4/10 mile north on Bulldog Drive, it crosses Route 309 at the stoplight on Ridgeview Drive, and then it detours south again 4/10 mile on Hausman Road before traffic continues westerly on Crackersport Road along Parkland Manor's north property line, where its driveway entrance is located. Parkland Manor needs electronic digital display exposure to highlight events at the Senior Living Facility, as well as to advertise specials to keep its rooms occupied and keep the business viable. This electronic graphic display will only be effective along the Route 22 frontage of the property.

The Route 22 border is the true "frontage" for the Properties, and is at obtuse angles for the Senior Residential facilities or they are totally blocked from Route 22 and require the proposed Pylon Sign of the size and nature indicated to allow for the visibility by Coordinated Development sign as intended by the Ordinance.

13. Do the conditions stated in question #12 prevent the possibility that the property can be developed within strict conformity of the Zoning Ordinance ?

YES.

14. Has the hardship been created by the applicant?

NO. Route 22 was a pre-existing roadway as to the development of the Subject parcels, and limits the areas of reasonable visibility as well as Crackersport Road having been cleaved into separate segments minimizing its use for other than persons going to a specific preplanned destination on those roads.

Also, the buildings' location do not make available building sides practical hosts of reasonable signage.

15. Will the character of the neighborhood be altered by the granting of this variance?

NO. The northerly side of Route 22 westbound would have evenly spaced Signage if this proposed use is allowed.

16. Is the requested variance the minimum variance needed to afford relief from the Zoning Ordinance?

YES. Reasons are set forth above.

17. Is the proposed use of the property permitted in the Zoning District it is located within?

YES.

18. Will the specific intended use of the premises generate any nuisance characteristics such as noise, dust, odor, etc. ?

NO.



# GOUCK ARCHITECTS

Stewart J. Gouck, AIA  
Registered Architect

Mr. Kent A. Baird, AICP  
Director of Development & Zoning Officer  
South Whitehall Township  
4444 Walbert Avenue  
Allentown, PA 18104  
[bairdk@southwhitehall.com](mailto:bairdk@southwhitehall.com)

April 20, 2026

**RE: Zoning Variance Letter of Intent / Project Narrative / Description of Work for:  
Additional Pylon Sign – Application of Crackersport Racquetball, LP for  
4668 Crackersport Road, South Whitehall Township, PA**

Dear Mr. Baird,

On behalf of our client, Crackersport Racquetball, LP, (“CRLP” or “Owner”), we submit this letter of intent and project narrative to accompany the zoning variance application and addendum, which lists the required variances and summary of presently identified hardships to justify granting the variances.

The request is to construct a new 20’x20’ Pylon sign along Route 22 for the primary purpose of identification of the Parkland Manor Senior Living facilities and operation which is a part of the coordinated development of the overall Property. The Pylon Sign design is proposed to have the top 67% of the sign face, (measuring 13’-4” tall x 20’ wide), maintain a static identification of Parkland Manor Senior Living onsite operations and availability and its affiliated services and companies. The bottom 1/3 of the Sign would measure 6’-8” tall x 20’ wide, and is proposed to be an electronic graphic display changing periodically in accordance with the visual time changes of the Township Ordinances.

The Property’s Coordinated Development consists of two primary and distinct groups of uses, each of which serve the community and can be displayed together in harmony with other signage along Route 22 westbound in that area.

The “Recreation” use [350-48(r)(3)] is the “St. Luke’s Sportsplex”, consisting primarily of the Parkland Pickleball facility, which makes full use of the existing 20’x20’ pylon sign on the easterly part of the Route 22 frontage of the site. Its large indoor and outdoor space and commitment to well-being and the sports, especially Pickleball, and related services, have required that entire Sign. Practical considerations for St. Lukes require it

maintain its own identity and also prevent a shared Signage as is usual for "shopping center" coordinated developments.

The other use is Parkland Manor, a Senior Residential facility, located on a different portion of the Coordinated Development site to the west of Sportsplex, and further separated from the Property's Route 22 border. This second group of uses for the "Retirement Facility" [350-48(r)(10)] is largely hidden behind the Sportsplex domes, the cell-tower and trees from Route 22, and requires its own pylon sign to provide exposure to Route 22 for those seeking to visit as well as for those whose family needs will include Senior Residential Care in South Whitehall Township.

The placement of Parkland Manor's senior housing makes the Requested Sign a more reasonable and effective display of this Senior Facility than using Building Face Signs or other directly attached signs, since such placement would present a poor viewing angle.

We have considered placing a conforming Building Face Sign on the east elevation of Parkland Manor, following the zoning requirements for Building Face Signs per 350-48(s)(10)(E)(xii).

The "wall sign" is impractical since the entire east elevation of the Parkland Manor building consists of windows and french doors. There is no location on the building where we can fit our permitted building face sign. Furthermore, that building face is located over 303 feet from the Route 22 median and it is hidden behind trees, a cell phone tower, and the St. Luke's Sportsplex. Consequently, since a conforming building face sign will not be effective, we are requesting relief to construct a second Parkland Manor pylon sign located 462.3 feet west of the existing St. Lukes pylon sign.

Parkland Manor needs electronic digital display exposure to highlight events at the Senior Living Facility, as well as to advertise specials to keep its rooms occupied and keep the business viable. This electronic graphic display will only be effective along the Route 22 frontage of the property.

There is very little traffic or exposure on Crackersport Road, where the driveway entrances to Parkland Manor are located, and where the ordinance permits an electronic graphic display on a Monumental Entrance Sign. This is because Crackersport Road was bisected and made discontinuous without an underpass or overpass when the Route 22 & 309 cloverleaf intersection was constructed. Westbound traffic on Crackersport Road is detoured 4/10 mile north on Bulldog Drive, it crosses Route 309 at the stoplight on Ridgeview Drive, and then it detours south again 4/10 mile on Hausman Road before traffic continues westerly on Crackersport Road along Parkland Manor's north property line, where its driveway entrance is located.

A complete list of our variance requests and hardships for each variance is presented in the Addendum to our Zoning Variance Application. We reserve the right to supplement the identified hardships and other justifications for the requested relief at the hearing.

Best Regards,

Eugene Berg, Jr., AIA  
Registered Architect  
Gouck Architects  
1304 Hamilton Street  
Allentown, PA 18102

PREPARED BY:  
ABE Abstract, Inc.  
38 West Market Street  
Bethlehem, PA 18018  
(610) 865-9121

RECORDED  
10/01/2015 1:48:49 PM  
RECORDER OF DEEDS  
LEHIGH COUNTY  
PENNSYLVANIA  
Inst Num: 2015029476

RETURN TO:  
ABE Abstract, Inc.  
38 West Market Street  
Bethlehem, PA 18018  
(610) 865-9121

Lehigh County PIN/Parcel Nos. 547658275036 1 & 547648920576 1, 4636 Crackersport Road &  
~~4620~~ Crackersport Road

### SPECIAL WARRANTY DEED

This Deed, made on the ~~30<sup>th</sup>~~ day of September, 2015, between,

Racquetball Centers, A Limited Partnership By: Adavest, LP, in its capacity as Receiver, pursuant to Court Order dated May 6, 2014, incorporating Court Order dated October 17, 2012, filed in the Office of the Clerk of Courts-Civil of Lehigh County, Pennsylvania to File No. 2012-C-2082 hereinafter called the Grantor(s), Party(ies) of the first part,

AND

Crackersport Racquetball, LP, a Pennsylvania Limited Partnership, hereinafter called the Grantee(s), Party(ies) of the second part.

WITNESSETH, that the Party(ies) of the First Part, for and in consideration of Two Million dollars & no cents, (\$2,000,000.00) in hand paid, the receipt whereof is hereby acknowledged, the said Grantor(s) do(es) hereby grant and convey unto the said Grantee(s), his/her/their heirs and assigns,

ALL THAT CERTAIN real property, together with the real improvements thereon, situate, lying and being in South Whitehall Township, County of Lehigh and Commonwealth of Pennsylvania, which is bounded and described as follows:

**Description Tract-1**

Being a tract or parcel of land situate in South Whitehall Township, County of Lehigh, and Commonwealth of Pennsylvania, and being more particularly described as follows:

**Beginning** at a point for corner at the intersection of the southerly right-of-way line of Crackersport Road(65' feet wide) and the westerly property line of J&G Properties, Inst.# 7219574;

**Thence** South 08°16'28" East along said westerly property line of J&G Properties, Inst.# 7219574 for a distance of 234.01' feet to a iron pipe found for corner;

**Thence** South 08°16'28" East along said westerly property line of J&G Properties, Inst.# 7219574 for a distance of 275.00' feet to a iron pipe found for corner;

**Thence** North 83°10'49" East along said southwesterly property line along J&G Properties, Inst.#7219574 for a distance of 300.97' feet to a point for a corner;

**Thence** South 08°34'41" East along said westerly property line along J&G Properties, Inst.# 7219574 for a distance of 133.56' feet to an iron pin;

**Thence** South 25°13'41" East along said westerly property line along J&G Properties, Inst.# 7219574 for a distance of 32.21' feet to a point, said point being the ROW line for State Route 078;

**Thence** South 62°20'13" West along said Right-Of-Way line for a distance of 452.26' feet to a pin;

**Thence** South 51°26'45" West along said Right-Of-Way line for a distance of 101.12' feet to a pin;

**Thence** South 61°12'18" West along said Right-Of-Way line for a distance of 276.44' feet to a pin;

**Thence** North 70°33'38" West along said property line of Racquetball Centers (Lehigh County Tax Map H7-15-8 and Deed Book 1324, Page 0381) for a distance of 404.02' feet to a pin, said pin being a corner for said property owners (Racquetball Centers);

**Thence** North 14°10'13" East along said property line for (Neil & M.A. Eichelberger, Inst. #7286239 & Daryl Miller, Inst. # 7289890) a distance of 530.82' feet to a pin;

**Thence** North 82°31'30" East along said lands of Center & Dewberry Partners LP for a distance of 145.20' feet to a pin;

**Thence** North 24°28'30" West along said lands of Center & Dewberry Partners LP for a distance of 147.12' feet to a pin, said pin being the southerly ROW Line of Crackersport Road;

**Thence** North 53°06'05" East along said Right-Of-Way line of Crackersport Road for a distance of 20.08' feet to a pin;

**Thence** along a curve to the right having a delta angle of 13°49'00" with a radius of 465.00' feet and a length of 112.13' with a tangent being 56.34' feet along said Right-Of-Way line to a point;

**Thence** North 66°55'05" East along said Right-Of-Way line for a distance of 247.79' feet to a point;

**Thence** North 64°28'35" East along the said southerly Right-Of-Way line of Crackersport Road for a distance of 157.28' feet to the **Point of Beginning**.

**Containing:** 610,449.84 S.F. or 14.014 Acres of Land more or less.

ALSO KNOWN AS LEHIGH COUNTY PIN NO. 547658275036 1

**Description Tract-2**

Being a tract or parcel of land situate in South Whitehall Township, County of Lehigh, and Commonwealth of Pennsylvania, and being more particularly described as follows:

**Beginning** at a point for corner on the southwestern property line of said Tract-1;

**Thence** South 70°33'38" East along said property line of Racquetball Centers for a distance of 403.79 feet to a pin;

**Thence** South 61°18'22" West along said Northerly ROW for State Route I-78 for a distance of 257.08' feet to a pin;

**Thence** North 58°04'31" West along said land of Steve & Justina Krasulak, Deed Book 0592, Page 0375 for a distance of 282.41' feet to a pin;

**Thence** N 08 55'29" East along lands of Neil & M.A. Eichelberger for a distance of 132.00' feet;

**Thence** South 71°04'31" East along the said southerly lands of David M. Kulp, Deed Book 1445, Page 1170 for a distance of 67.61' feet to the **Point of Beginning**.

**Containing:** 62,350.54 S.F. or 1.4314 Acres of Land more or less.

ALSO KNOWN AS LEHIGH COUNTY PIN NO.: 547648920576 1

AND the said Grantor(s) do(es) hereby SPECIALLY WARRANT AND FOREVER DEFEND the property hereby conveyed,

BEING THE SAME PREMISES which Vantage Point Racquet Club, a Limited Partnership, by Deed dated September 6, 1983 and recorded in the Office of the Recorder of Deeds in and for Lehigh County, Pennsylvania, on September 7, 1983, in Deed Book Volume 1324, Page 381, did grant and convey unto Racquetball Centers, a Limited Partnership, Grantor(s) herein.

TOGETHER with all and singular the buildings, if any, improvements, streets, alleys, passages, ways, waters, water courses, rights, liberties, privileges, hereditaments and appurtenances whatsoever thereunto belonging, or in anywise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim, and demand whatsoever of the said Party of the First Part, its successors and assigns, in law, equity or otherwise, howsoever, of, in and to the same, and every part thereof.

TO HAVE AND TO HOLD the said land and/or buildings, the hereditaments and premises hereby granted or mentioned, and intended so to be, with the appurtenances, unto the said Party(ies) of the Second Part, his/her/their heirs and assigns, to and for the only proper use and behoof of the said Party(ies) of the Second Part, his/her/their heirs and assigns, forever, SUBJECT as aforesaid.

AND the said Party of the First Part, for itself and its successors, does by these presents covenant, grant and agree to and with the said Party(ies) of the Second Part, his/her/their heirs and assigns, that it, the said Party of the First Part, and its successors, all and singular the hereditaments and premises herein above described and granted, or mentioned, and intended so to be, with the appurtenances, unto the said Party(ies) of the Second Part, his/her/their heirs and assigns, against it, the said Party of the First Part and its successors, and against all and every other person or persons whomsoever, lawfully claiming or to claim the same, or any part thereof, by, from or under it, them or any of them shall and will, SUBJECT as aforesaid SPECIALLY WARRANT AND FOREVER DEFEND.

The Racquetball Centers, A Limited Partnership BY: Adavest, LP, in its capacity as Receiver, the said Party of the First Part, does hereby constitute and appoint Gregory F. Pellathy, Managing Member of the General Partner, Adavest Partners, LLC, to be its attorney, for it and in its name, and as and for its corporate act and deed, to acknowledge this Indenture before any person having authority by the laws of the Commonwealth of Pennsylvania to take such acknowledgment, to the intent that the same may be duly recorded.

IN WITNESS WHEREOF, said Grantor(s) has/have hereunto set his/her/their hand(s) and seal(s) the day and year first above written to be signed in its name and behalf by the Managing Member of Adavest Partners, LLC, General Partner of Adavest, LP, duly authorized to do so, the day and year first written above.

Racquetball Centers, A Limited Partnership By: Adavest, LP as capacity as Receiver, pursuant to Court Order dated May 6, 2014, incorporating Court Order dated October 17, 2012, filed in the Office of the Clerk of Courts-Civil of Lehigh County, Pennsylvania to File No. 2012-C-2082 - Seller

Thomas Barnes  
- Witness

BY: Gregory F. Pellathy  
Gregory F. Pellathy, Managing Member of Adavest Partners, LLC, General Partner of Adavest, LP - Seller

COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF Montgomery :

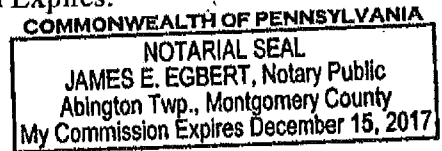
On the 3<sup>rd</sup> day of September, 2015, before me, the undersigned officer, a Notary Public in and for the said Commonwealth and County, appeared Gregory F. Pellathy, who acknowledged himself to be the Managing Member of Adavest Partners, LLC, General Partner Adavest, LP, and that ne, as such Managing Member, being authorized to do so, Executed the foregoing instrument for the purpose therein contained bt signing the name of the Grantor by himself as Managing Member.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

James E. Egbert  
Notary Public  
My Commission Expires: 12-15-2017

I hereby certify that the precise address of the Grantee(s) herein is:  
1177 North Sixth Street, Whitehall, Pennsylvania 18052

Emily M...



ANDREA E. NAUGLE  
LEHIGH COUNTY CLERK OF JUDICIAL RECORDS



Recorder of Deeds Division  
Deborah A. Casciotti, Chief Deputy  
Lehigh County Courthouse  
455 W. Hamilton Street - Room 122  
Allentown, PA 18101-1614  
(610) 782-3162

\*RETURN DOCUMENT TO:

ABE ABSTRACT  
38 W MARKET STREET  
BETHLEHEM, PA 18018

**Instrument Number - 2015029476**

Recorded On 10/1/2015 At 1:48:49 PM

\* Instrument Type - DEED

Invoice Number - 251083 User ID: KCA

\* Grantor - RACQUETBALL CENTERS

\* Grantee - CRACKERSPORT RACQUETBALL LP

\* Customer - ABE ABSTRACT

\*Total Pages - 6

\* FEES

STATE TRANSFER TAX	\$20,000.00
STATE WRIT TAX	\$0.50
STATE JCS	\$35.50
RECORDING FEES	\$15.00
AFFORDABLE HOUSING	\$11.50
COUNTY ARCHIVES FEE	\$2.00
ROD ARCHIVES FEE	\$3.00
UPI CERTIFICATION FEES	\$20.00
PARKLAND SCHOOL DISTRICT	\$10,000.00
SOUTH WHITEHALL TOWNSHIP	\$10,000.00
TOTAL PAID	\$40,087.50

I hereby CERTIFY that this document is  
Recorded in the Recorder of Deeds Office  
of Lehigh County, Pennsylvania



*Andrea E. Naugle*

Andrea E. Naugle  
Clerk of Judicial Records  
Recorder of Deeds Division

LCGIS Registry UPI Certification  
On October 1, 2015 By LY

THIS IS A CERTIFICATION PAGE

**Do Not Detach**

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

\* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

INSTRUMENT NUMBER - 2015029476

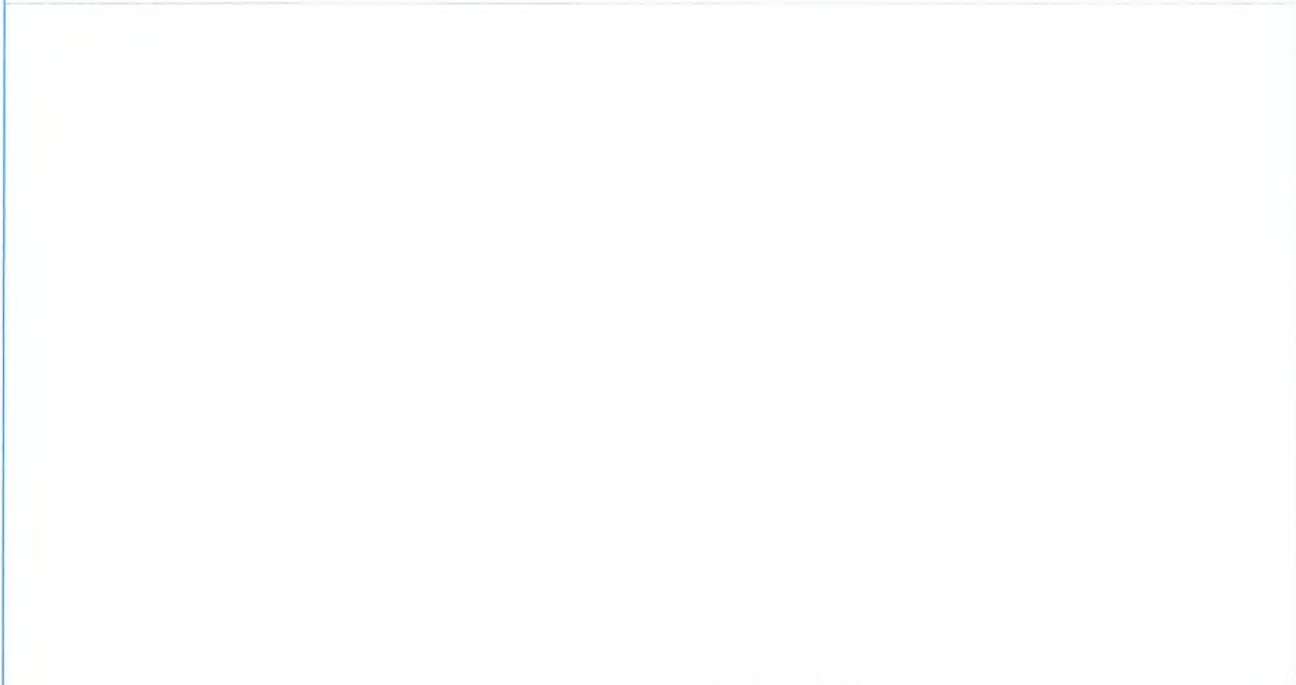


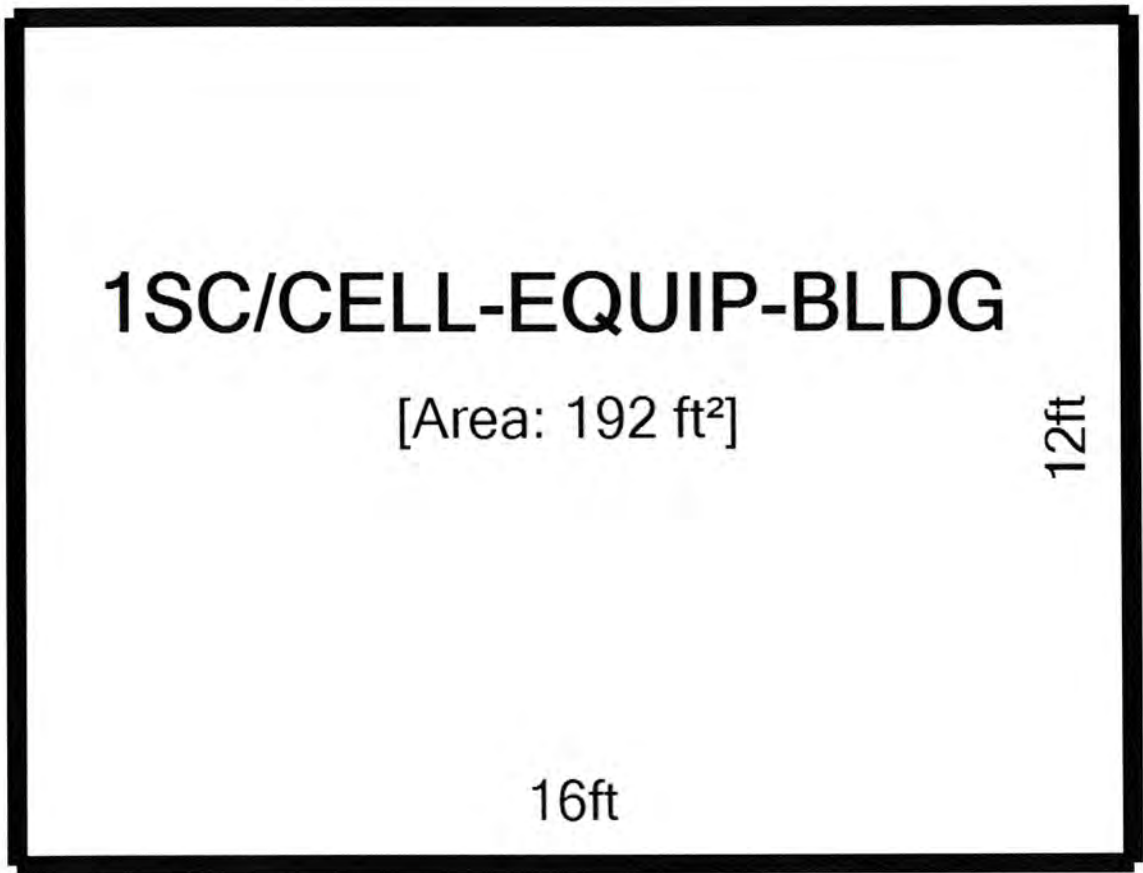
### County of Lehigh Online Records Access Property Details

Street View



Footprint





[Sketch Codes](#)

### Options

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### Property Overview

2026

**Owner Name**

CRACKERSPORT RACQUETBALL LP

**Owner Address**

1177 N 6TH ST  
WHITEHALL PA 18052-5212

**Property Address**

4668 CRACKERSPORT RD  
ALLENTOWN PA 18104

**Parcel Viewer**

[View in Parcel Viewer](#)

**Low Number**

4668

**High Number**

4668

**Unit/Lot**

5

**Sub Division**

PARKLAND PLACE CONDO

**Tax Authority**

SOUTH WHITEHALL TOWNSHIP

**School District**

PARKLAND SCHOOL DISTRICT

**Parcel Id**

547658275036 6

**Old Parcel Id**

19

**Tile**

465703

**Acres/Dimension**

0.1366 AC

**Lot Sq Ft**

0

**Utilities**

NONE

**Class**

COMMERCIAL

**Land Use**

TRANSMISSION TOWERS (RADIO/TV/CELL)

**Living Units**

0

**Zoning**

IC-1

**Homestead Act 72**

You may apply if it is your permanent primary residence.

**Preferential Land Act**

NO

**Agricultural Easement**

NO

**Assessment Base Year**

2013

**Total Assessment**

Exempt Land	0
Exempt Building	0
Taxable Land	12,300
Taxable Building	67,900
Total	80,200
Taxable Total	80,200

**Estimated Taxes**

**Mills**

**Estimated Taxes**

County	3.780000	\$ 303.16
School	17.900000	\$ 1,435.58
Municipality	3.599750	\$ 288.70
Total		\$ 2,027.44

**Bill Number**

1901406

**LC\_PropertyAddress**

4668 CRACKERSPORT RD ALLENTOWN PA 18104

Commercial Profile Data

**Assessment Base Year**

2013

**Type of Building**

LIGHT COMM UTILITY BLDG

**Floor Area**

192

**Number of Stories**

1

**Year Built**

1999

**Elevator**

NO

**Sprinklers**

NO

**Basement Area**

0

**Additional Information**

FENCE, , , , , , , , CELL TOWER

Sales History

Sale Date	Owner Name	Document Id	Sale Price
/0000	CRACKERSPORT RACQUETBALL LP	2018013841	\$ 0

# County of Lehigh Online Records Access

## Property Details

### Street View



### Footprint





Options

[Back To Results](#)

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Property Overview

2026

**Owner Name**  
CRACKERSPORT RACQUETBALL LP

**Owner Address**  
1177 N 6TH ST  
WHITEHALL PA 18052-5212

**Property Address**  
\* CRACKERSPORT RD  
ALLENTOWN PA 18104

**Parcel Viewer**  
[View in Parcel Viewer](#)

**Low Number**  
\*

**High Number**

\*

**Tax Authority**

SOUTH WHITEHALL TOWNSHIP

**School District**

PARKLAND SCHOOL DISTRICT

**Parcel Id**

547648920576 1

**Old Parcel Id**

19 H07 015 008

**Tile**

465702

**Acres/Dimension**

1.4314 AC

**Lot Sq Ft**

0

**Utilities**

NONE

**Class**

VACANT LAND

**Land Use**

VACANT LAND - INDUSTRIAL 40001 TO 60000 SQFT

**Living Units**

0

**Zoning**

IC-1

**Homestead Act 72**

You may apply if it is your permanent primary residence.

**Preferential Land Act**

NO

**Agricultural Easement**

NO

**Assessment Base Year**

2013

**Total Assessment**

Exempt Land		0
Exempt Building		0
Taxable Land		96,500
Taxable Building		0
Total		96,500
Taxable Total		96,500

**Estimated Taxes**

	<b>Mills</b>	<b>Estimated Taxes</b>
County	3.780000	\$ 364.77
School	17.900000	\$ 1,727.35
Municipality	3.599750	\$ 347.38
Total		\$ 2,439.50

**Bill Number**

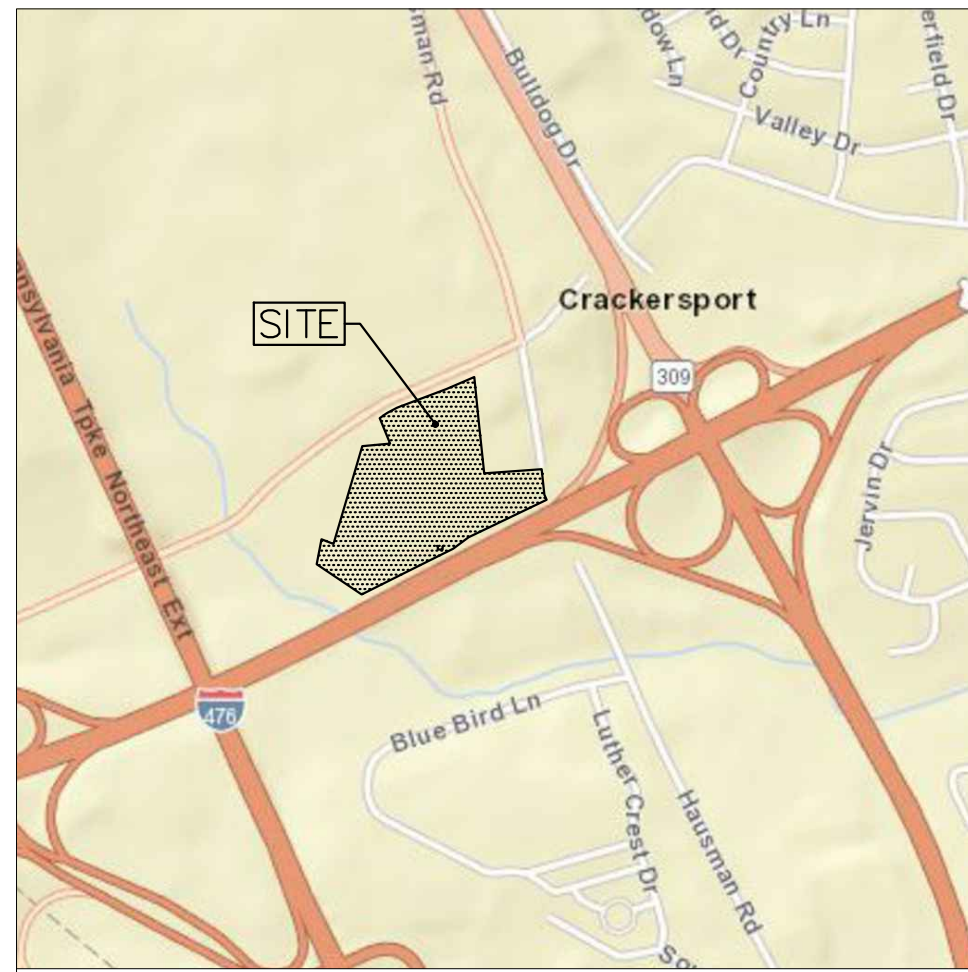
1901402

**LC\_PropertyAddress**

\* CRACKERSPORT RD ALLENTOWN PA 18104

## Sales History

Sale Date	Owner Name	Document Id	Sale Price
<b>09/2015</b>	CRACKERSPORT RACQUETBALL LP	2015029476	\$ 2,000,000
<b>09/1983</b>	RACQUETBALL CENTERS	1324/0381	\$ 1,595,000
<b>02/1981</b>	VANTAGE POINT RACQUET CLB	1290/0337	\$ 2,113,000



LOCATION MAP  
SCALE: 1" = 1000'

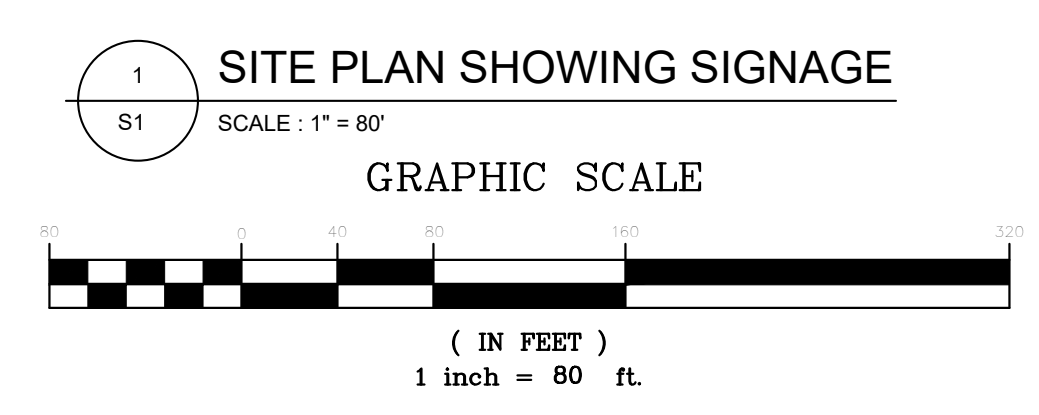
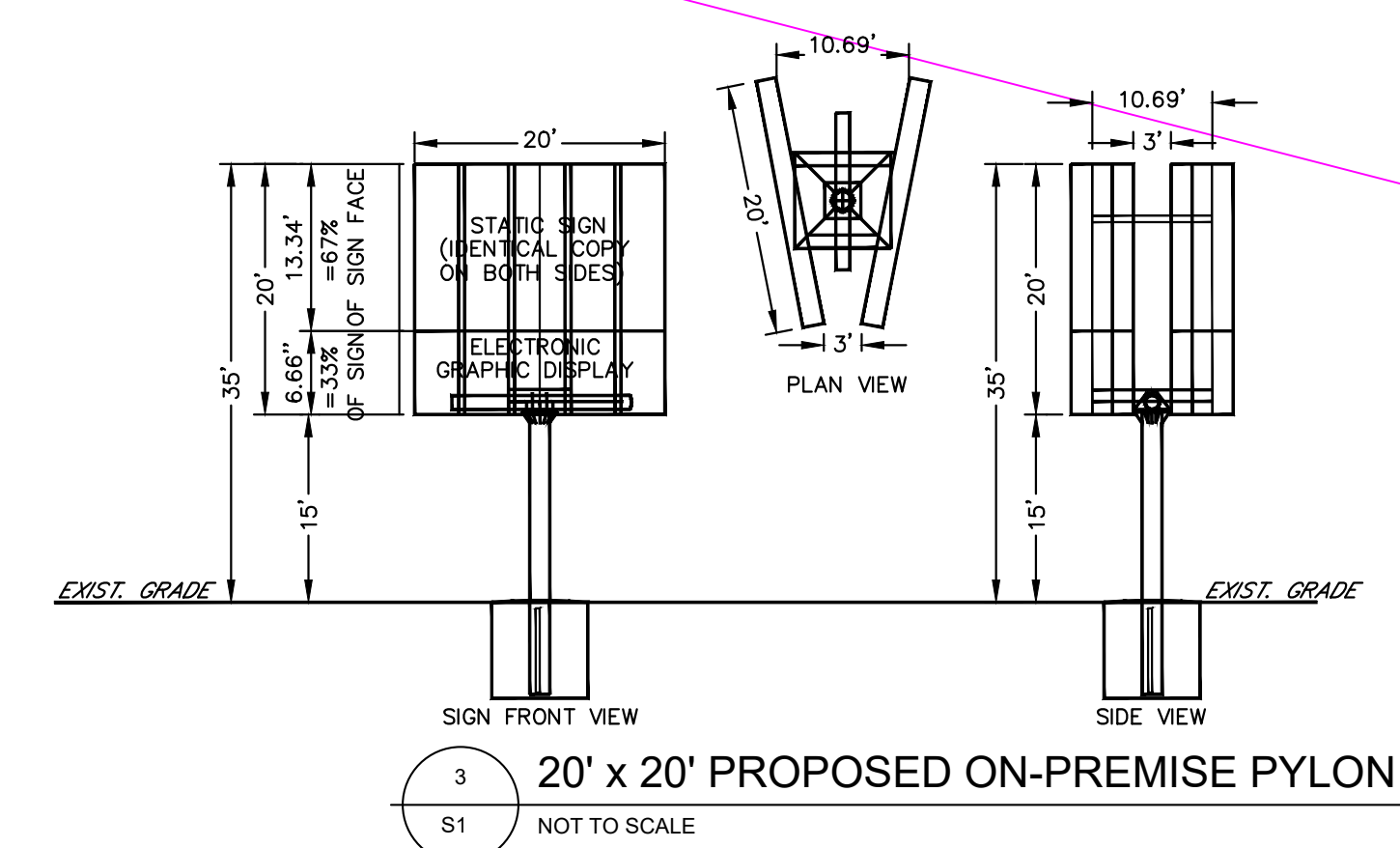
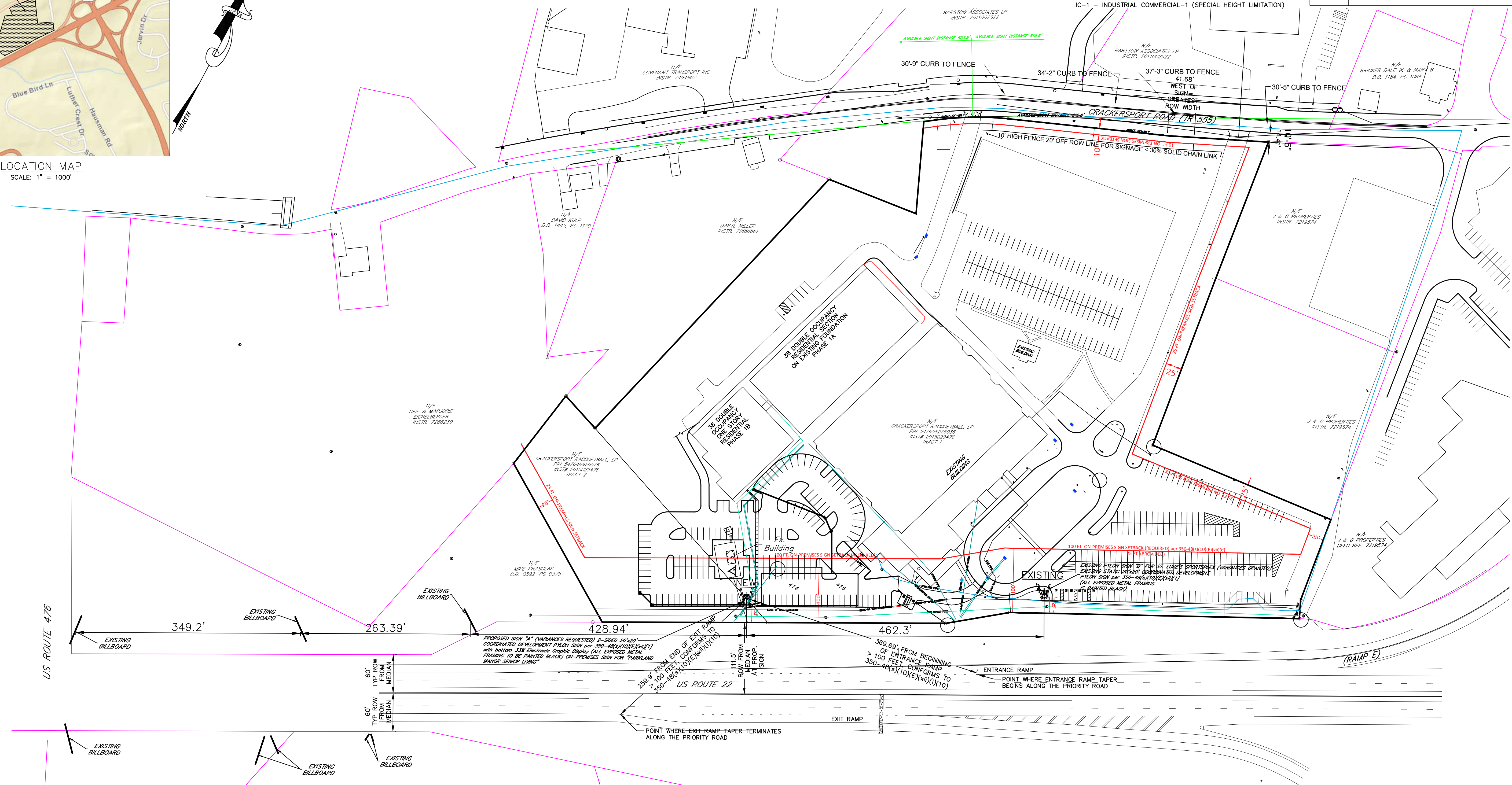


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A Three Working Day Notice is the Law!  
**1-800-242-1776**  
**Dig Safely.**  
www.paonecall.org

**SITE DATA**

PROPERTY ADDRESS: 4636 CRACKERSPORT ROAD ALLENTOWN, PA. 18104  
OWNER: CRACKERSPORT RACQUETBALL L.P. 1177 6TH STREET WHITEHALL, PA. 18052  
PIN #: 547658275036 & 547648920576  
OLD PARCEL ID. NO. 19 H07 015 007  
DOCUMENT ID: VOL. 1324, PG. 381  
ZONING DATA  
SOUTH WHITEHALL ZONING DISTRICT:  
IC-1 - INDUSTRIAL COMMERCIAL-1 (SPECIAL HEIGHT LIMITATION)

DATE	REVISIONS	BY



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**GOUCK ARCHITECTS**  
STEWART J. GOUCK  
REGISTERED ARCHITECT  
1304 Hamilton Street, Allentown, PA 18102  
(610) 439-8818 info@gouckarchitects.com

**PENNSYLVANIA VENTURE CAPITAL INC.**  
1177 6TH STREET, WHITEHALL, PA. 18052  
PHONE: (610) 403-3400 FAX: NO.: (610) 403-3408

ON-PREMISES SIGN PLAN  
PARKLAND MANOR  
4668 CRACKERSPORT ROAD  
TOWNSHIP OF SOUTH WHITEHALL  
LEHIGH COUNTY - PENNSYLVANIA

SHEET: S1 of 1  
PROJECT: 092816  
DATE: 4-17-2026  
SCALE: 1" = 80'  
DRAWN BY: GB  
CHECKED BY: SG