



CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

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March 22, 2022

Robert DeBeer
Peron Development, LLC
60 W. Broad St., Suite 102
Bethlehem, PA 18018

RE: (21-018 LD&S) – 21120008 – 413-415 E. 3rd Street – Land Development & Subdivision Plan – Ward 4, Zoned IR-R, plan dated September 28, 2021 and revised January 17, 2022.

Dear Mr. DeBeer:

The above-referenced plan has been reviewed by the appropriate City offices. We offer the following comments:

ENGINEERING

Public Works – Engineering

1. In order to maintain continuity between plan revisions, any changes to a previous plan submission shall be flagged with a triangle. Any changes not flagged may be considered not approved. Flagged changes shall be referenced to the appropriate revision date in the revision block.
2. Only show the pertinent information that is relevant for each sheet. This improves plan readability and reduces confusion before, during, and after construction. Examples of this include but are not limited to the following:
 - a. Stormwater System
 - b. Sidewalk Easements
 - c. Existing Contours shown in buildings.
 - d. Gas main
 - e. Sanitary Sewer

Please limit these items/layers to their respective sheets.

3. Right of way and property line appear to be the same line type. Please use a visibly different line type.

Public Works – Lighting

At this note to the record plan:

1. “All of the existing street lights and traffic signal structures including all equipment and underground conduits will become the contractor’s responsibility during the project. If any structures need to be temporarily removed it will be the contractor’s responsibility along with all associated cost. The safe storage and restoration to the same condition prior to removal is the contractor’s responsibility. All such work must be coordinated and approved by the city electrician and the engineering department prior any altering of any city infrastructure. “

ZONING

1. The parcel is located within the (IR-R) Industrial Redevelopment – Residential Zoning District. The proposed uses as a Parking Structure of two or more levels, Retail and Multi-Family Dwellings are each permitted by-right.

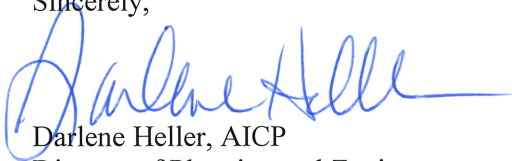
2. Sheet 1 of 15, Cover Sheet, General Information, Item 4, Statement of Intent, correct to state, "...for the permitted uses of retail, multi-family dwellings and attached parking structure.
3. Sheet 1 of 15, Cover Sheet, General Information, Item 12, Bicycle Parking, Required = five spaces.
4. Sheet 5 of 15, Dimension Plan, correct Amenity, Room 102, 996.57 SF, to reflect the architectural plans.
5. Sheet 5 of 15, Dimension Plan, show bicycle parking on the plan.
6. Sheet 9 of 15, Lighting Plan, provide a photometrics plan in compliance with 1318.25(h).
7. Sheet 10 of 15, Landscaping Plan, provide a chart indicating the number of trees to be removed, the number of trees to be replaced and the number of trees to request payment in lieu of replacement, ref. 1318.28.
8. Identify if the undulating front wall (Third Street) will have setbacks at the floor plates or if the change in depth is limited to façade materials.
9. Identify if the sections of the façade that extend above the roof include returns or if they are flush with the front wall (Third Street).
10. Identify façade panel material, e.g. Alucobond, ref. 1308.01(e)(8).
11. Indicate window locations on the floor plans.
12. The Renderings and the Floor Plans do not match at grade at the south east corner (Amenity and Lobby).
13. The Renderings and the Floor Plans do not match at the entry for the retail space (either squared or angled).
14. The Renderings and the Floor Plans do not match at the fifth floor, south east and south west corners (Roof Decks).
15. The Renderings and the Floor Plans do not match the number of balconies.
16. Variences Required – Submission to the Zoning Hearing Board is required for relief from the following provisions in the Zoning Ordinance. The City's Zoning Officer can provide assistance with this process.
 - a. 1306.01(b)(10)(b), Minimum Front Yards Setback = 10', zero proposed; Minimum Side Yard Setback = 10', zero proposed; Minimum Rear Yard Setback = 10', zero proposed for the connecting bridge; and each requires Dimensional Variences.
 - b. 1308.01(d)(1), Lot Area per Dwelling = 1,200 SF, 11,855 SF Tract / 1200 = nine dwellings permitted, 35 proposed; requires a Dimensional Variance, 1200 SF/DU reduced to 338.7 SF/DU.

GENERAL

1. A recreation fee of \$56,265.00 shall be paid prior to the execution of the developer's agreement.
2. The project is on a parcel currently designated as eligible for Local Economic Revitalization Tax Assistance (LERTA) benefits. Increased assessment resulting from new construction, renovation, and improvements may be eligible for a 10-year abatement on increased property taxes. Applications for LERTA must be submitted within 60 days of receiving the building permit. To discuss the program, please contact the Dept. of Community & Economic Development.
3. The project is on a parcel currently designated as eligible for Enterprise Zone (EZ) Tax Credit benefits. Eligible program activities include rehabilitation, expansion, improvement to a building(s), improvement to land, engineering, architecture, and acquisition. To discuss whether the project would qualify for a tax credit, please contact the Dept. of Community & Economic Development.
4. The 5 story building proposes 35 dwelling units. Bethlehem has been approaching new developments with a substantial number of units to include 10% as affordable units, making them available to renters at 80% of AMI. Providing this amount of affordable units is a realistic goal, the City is asking all proposed multifamily projects for assistance in the provision of affordable units at an amount of ten percent. With that goal in mind, we suggest that 4 units meet all the guidelines of affordability for residents at 80% of AMI.
5. It appears that low level landscaping can be added at the east and west front corners.
6. Comments from the Environmental Advisory Council are enclosed for your review and comments. Please make sure responses are provided for the letter when the revised plans are submitted.

When these comments are addressed, please submit two (2) sets of revised plans, a partial set for City Electrician, an electronic plan, and a comment/response letter for further review.

Sincerely,



Darlene Heller, AICP
Director of Planning and Zoning

Cc: B. Yandem A. Karner
C. Peiffer L. Rothman, EAC
P. Godbout R. Roseberry, Colliers Engineering & Design
G. Cryder

Enclosure



10 East Church Street
Bethlehem, Pa. 18018
www.bethlehemeac.org

Darlene L. Heller, Director of Planning and Zoning
Tracy Samuelson, Assistant Director of Planning and Zoning
City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

January 6, 2022

Dear Ms. Heller and Ms. Samuelson,

We appreciate the opportunity to comment on the proposed development at 413-415 E. 3rd Street. Our recommendations are in support of Bethlehem City's Climate Action Plan (CAP), which aims to reduce our carbon footprint, increase sustainability and utilize alternative energy sources.

New construction projects provide opportunities to employ energy saving strategies that will lower energy costs and at the same time reduce pollution from traditional energy sources. Therefore, we strongly recommend that the developer utilize sustainable building materials and energy efficiency measures beyond the building code, such as passive solar design features, advanced lighting controls, high efficiency HVAC equipment, increased insulation and advanced air sealing techniques to reduce infiltration. A green roof would contribute to lessening the heat island effect, which is of great concern on the Southside of Bethlehem, especially as the climate continues to warm. Green roofs also help lower the heat inside the building and aid in stormwater management.

Furthermore, we encourage the developer to evaluate the inclusion of solar panels or at least constructing the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date.

Whenever possible, existing trees should be preserved or replaced elsewhere in the city, as required. Landscaping is important and we recommend coordinating with the City Forester in the selection of native species for both street trees along the front of the building as well as trees and landscaping in the back of the building. Increased greenery along the street will also soften the building's impact and make it more inviting.

Another recommendation is the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9). Secure indoor and outdoor bike parking facilities on both lots for residents, visitors and shoppers would be ideal, especially since it can be difficult to store a bike in an apartment if there isn't dedicated space.

Due to the height of the building and what appear to be an abundance of large windows, we note the potential for bird impacts. We suggest that the design, location and lighting of the building be evaluated for potential collision risk. It is possible to purchase glass made specifically to reduce bird flight impacts and bird kills, known as bird friendly glass. The following links to brief educational videos, made in collaboration with Muhlenberg College, speak to this issue and how and how it can be addressed for this and future projects.

[Bird Safe Glass Explained: The Issue](#)

[Bird Safe Glass Explained: Solutions](#)

Thank you for your consideration.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend

Ben Felzer

Ben Guthrie

Mike Topping

cc: Bethlehem City Council

Mayor J. William Reynolds