



CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

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October 7, 2022

HRP Management, LLC
190 Brodhead Road, Suite 110
Bethlehem, PA 18017

RE: (22-011 LD&S) – 22080001– 1170 8th Avenue – Tower Place, Lot 1 & Lot 2. – Land Development and Subdivision Plan –Ward 13, Zoned OMU, plan dated August 3, 2022 and revised September 23, 2022

Dear Sir:

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

PUBLIC WORKS

Engineering

Stormwater

1. The Stormwater Management Report shall be submitted to LVPC and a copy of their approval letter shall be included in a future submission.
2. The area of existing and proposed impervious coverage shall be clearly shown in the site data on the record plan. The existing and proposed impervious coverage data shall be shown for Lots 1 and 2. The impervious coverage fee will be calculated from this information.
3. The Erosion and Sediment Control Plan shall be reviewed by DEP. A copy of the NPDES Permit will be required.
4. The Stormwater plan needs to include a long-term maintenance plan for the underground detention basins.

Sanitary

1. In accordance with Ordinance No. 4342 tapping fee will not apply for the proposed sanitary flows. Please note that building permits cannot be issued until the Planning Module is approved by DEP.
2. Tapping fee will need to be calculated for future development.

Miscellaneous Engineering

1. Check legends on each sheet as many of the line types shown look the same which make identifying features confusing. Please don't use colors.
2. All proposed internal roadway names shall be provided. The City will confirm if they are acceptable as there cannot be duplicate names within the City. We understand that Plaza Drive East is included in this phase. Additional street names will need to be approved in advance.
3. All ADA ramps that only cross the road in one direction shall be aligned with the direction of the crosswalk, not at an angle. ADA Curb Ramp designs must be submitted for review as well.
4. Ownership of the roads and utilities shall be discussed.
5. Add the new addresses (1480 and 1490 8th Avenue) to the overall Land Development Plan and Land Development Plans "A" and "B" as appropriate.
6. Copies of all approved Highway Occupancy Permits from PennDOT shall be submitted.

Traffic

1. Please copy the City on conversations with LANTA for potential bus shelter and stop locations.

2. The improvements within the approved HOP at Plaza Dr and 8th Ave and 8th and Eaton Ave shall be implemented with this phase, including the installation of turn arrows for Eaton Ave at 8th Ave and the median on Eaton Ave. This shall be added to the Developer's Agreement.
3. A note shall be added to the plan that "All pavement markings within the City's Right of Way shall be thermoplastic."

Lighting

1. Provide a traffic signal drawing showing the existing pole, curb and sidewalk locations for both intersections. Also provide a drawing with the new proposed signal pole, curb, sidewalk, and junction box locations including the signal cabinet locations.
2. In reference to the September 23rd letter from Pennoni, the City agrees that if the existing pole locations do not need to be altered, the existing pole and mast arms can be used. The exception to the letter is that all of the traffic signal wire for the entire intersection will need to be new from the control box to the signal heads including the pedestrian signals. All of the existing signal equipment, wire, signal heads, mounting hardware and control cabinet will need to be replaced with new. All new wire will need to be repulled back to the new control box. The control box and controller box will need to be replaced with a new cabinet and equipment designed for the new configuration.

Forestry

1. Incorporate additional low growing vegetation around both buildings. Plan shows only 1 side of each building having vegetation along it.
2. Add additional landscaping in parking lots. Low growing vegetation can be planted in landscape islands where street lighting is proposed.

ZONING

1. Sheets C-1 thru C-10, Statement of Intent, third paragraph, replace SALDO with Zoning Ordinance.
2. Sheets C-2 thru C-10, Zoning Data Chart, Provided, correct to reflect actual.
3. Sheet C-3, Subdivision Plan "A," Lot 1 and Sheet C-5, Subdivision Plan "C," Lot 2, correct the rear yard setback from 20' to 30'.
4. Sheet C-20, Overall Land Development Plan, provide parking counts, it is duly noted that this is also included on Sheets C-21 and C-22.
5. Sheets C-20 and C-21, provide pedestrian access from Eaton Avenue to the primary entry of Building 1, Ref. 1311.04(d) and 1311.06(c).
6. Sheet C-32, Landscaping and Lighting Plan "A," Tower Drive, correct tree quantity to reflect one tree per each 30 LF of street length and not 30' between outside edges of tree canopy.

GENERAL

1. A recreation fee of \$16,707 is required for Lot 1 and a fee of \$11,500 is required for Lot 2. Payment of fees is required at the time of the completion of the Developer's Agreement.
2. The City and developer shall continue to work with LANTA to coordinate shelter and bus stop locations, improvements and appropriate pedestrian access.
3. Comments from the Environmental Advisory Council are attached.
4. Additional comments from the April 5, 2019 letter related to the Overall Master Plan still apply. They include at least the following:
 - a. Impervious coverage shall be minimized wherever possible. For example, opportunities for shared parking are encouraged in the Zoning Ordinance and should be explored. Opportunities for increased greening of the site should be maximized.
 - b. Each of the lots provides a significantly greater number of parking spaces than what are required by the Zoning Ordinance. Parking should be minimized to provide a reduction of impervious coverage, allow for greater opportunity for greenspace and landscaping and to provide for greater opportunity for additional uses.
 - c. Access to and utilization of the existing surrounding trail system should be maximized including the Monocacy Way Trail. Improvements to sidewalk connections and circulation,

grade crossings, signage and other amenities should be considered as the Master Plan moves forward.

- d. Pedestrian and bicycle safety should be highlighted in the Plan. Although sidewalks are shown along major roadways, the plan should ultimately include improved crosswalks at critical intersections, removal of "slip lanes" onto 8th Avenue, pedestrian upgrades at intersections on 8th and Eaton Avenues, upgrade of the Monocacy Way Trail grade crossing on Eaton Avenue and dedicated pedestrian ways through the expansive parking lot areas.
5. Bethlehem recently completed construction of the northern end of Monocacy Way and recently was awarded grant funds for the southern end of the trail, creating a southern connection to the downtown and the D&L Trail. This major trail upgrade is a significant asset to the tenants and future residents of Tower Place. The City will continue discussions with the developer for appropriate contributions to this project.
6. As development of this site continues, an updated overall Master Plan shall be submitted.
7. Ultimately, sidewalk will be required along the entire frontage of this property, connecting to Burnside Plantation and the Monocacy Way Trail.
8. These projects are located on certified CRIZ parcels. Before subdivision can occur, these parcels should be decertified from the CRIZ and re-established as CRIZ parcels, as appropriate. Additionally, all CRIZ eligible development should be approved by the Bethlehem Revitalization and Improvement Authority and the Commonwealth of Pennsylvania before proceeding with construction.

This item will be placed on the October 13, 2022 Planning Commission Meeting Agenda.

Sincerely,



Darlene L. Heller, AICP
Director of Planning and Zoning

Cc:	B. Yandem	D. Shaffer
	C. Peiffer	G. Cryder
	P. Stefanelli	C. Arnold, Pennoni Assoc.
	A. Moussa	D. Wagner, LBD Commercial
	T. Wells	

Enclosure



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

September 21, 2022

Dear Ms. Heller and Mr. Peiffer,

The Bethlehem City Environmental Advisory Council appreciates the opportunity to comment on the proposed Tower Place development, 1170 8th Avenue. 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.

We commented on the development of the Martin Tower site in letters to City Council and the Planning Commission in 2016, 2019 and 2021. Our concern for the protection of the Monocacy Creek, which abuts the property, and our recommendations that the development incorporate sustainable design, greenery in the form of new trees and landscaping with native species, green stormwater infrastructure and renewable energy, remain unchanged.

As a prime location for a landmark redevelopment, this site could showcase cutting edge green design, respect open space and utilize smart growth principles. Such a design could encompass transit-oriented, walkable, bicycle-friendly land use with mixed use development. The developer has the opportunity to redevelop this site into a showpiece of sustainable design, in keeping with the goals of the City's Climate Action Plan and every effort should be made to employ these principles.

The EAC offers the following recommendations.

Parking/Pavements

- Consider permeable, porous or cool pavements to combat heat and help filter stormwater.
- Limit parking spots to the number required by the City.
- Use shared parking.
- Angle parking spaces to allow narrowing of access roadways.

- Parking garages in lieu of surface parking would reduce stormwater runoff and mitigate the heat island effect. Consider parking underneath apartment buildings.

Trees

Note that the mature trees that were cleared had a higher carbon sequestration capacity than new plantings. Trees also provide cooling to counteract the heat, reduce stormwater runoff and improve air quality.

- Compensate for the felling of mature trees. Recommend replacement on a 2 to 1 basis.
- Use native tree species that will be tolerant of changes in climate.
- Plant trees that grow to a larger mature size.
- Ensure that new trees are planted and cared for correctly in both the short and long term. For example, remove the cage around the balled and burlapped trees, dig holes to appropriate depth, water new plantings, etc. We can provide guidance in this respect.

Green space:

Green spaces slow and filter stormwater runoff, mitigate the heat island effect and provide habitat for the wildlife. Furthermore, green space as part of a development creates the opportunity to improve quality of life. Natural light and connection to the environment has been proven to add to productivity and relieve stress.

- Recommend areas of green space interspersed between all buildings.

Buffer area:

Natural corridors surrounding the property support and maintain existing wildlife and absorb storm water runoff.

- Strongly recommend a minimum buffer adjacent to wooded areas and slopes of 200 feet.
- Direct light from buildings and parking lots inward so that it does not encroach upon open space, disrupting native species and impacting their behavior.

Stormwater management

Traditional methods of stormwater management do not account for recent increases in the severity of rainfall events, necessitating the use of innovative methods of storm water control and proactive measures. The City complies with permitting requirements for Municipal Separate Stormwater Sewer Systems (MS4).

- Integrate stormwater management onsite and include the removal of contaminants, as opposed to only channeling it offsite.
- Pollutants and contaminants from automobiles and salt are of particular concern. Natural swales and wetlands would absorb and filter storm water and provide wildlife habitat.

Energy

- 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.

- Complete a solar assessment for solar panels on all buildings and in parking lots or on top of garages.
- Install solar panels where feasible. Note that there are currently tax credits for new solar systems. Furthermore, Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that allows financing for solar, increased energy efficiency and water conservation projects to be attached to the property instead of the owner. This can free up developers' finances by placing the assessment on the property and structuring repayment through property taxes.
- Install electric vehicle charging stations in both residential and commercial sections of the development.

Bike friendly

- Another recommendation is the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9). Bicycle parking outside businesses and secure indoor bike parking for residents and visitors alike would be ideal.

Bird Window Collisions

"Peer-reviewed, published research estimates that a minimum average of one million birds collide with windows in the USA daily; 365 - 988 million annually." (Overview and Executive Summary of the Bird collision Working Group Project, Feb. 12, 2020)
After habitat loss, glass is the biggest killer. The majority of bird strikes occur in low rise (4 stories and less) and residential buildings. We would be happy to provide more information.

- Encourage inclusion of physical barriers in front of glass and/or make glass visible to birds on the outside surface. Many products are available.

Thank you for your consideration.

Respectfully,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhor Kumar

Mandy Tolino

Mike Topping

Katie Trembler

cc: Mayor J. William Reynolds
City Council