



CITY OF BETHLEHEM BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

Phone: 610-865-7094

Fax: 610-865-7330

TDD: 610-865-7086

February 6, 2025

Reuther and Bowen
Attn: Laura Eberly

RE: (24-005 LD) – 24060008 – 1355 Easton Road – ECOPAX (n/f LVIP VII, 1355 & 1405 Easton Rd, Lots 53 & 54) – LAND DEVELOPMENT PLAN – Ward 16, Zoned IN, Plan dated May 31, 2024, last revised January 16, 2025.

Dear Ms. Eberly,

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

PUBLIC WORKS

Stormwater Engineering

1. We believe this project is showing a proposed increase of impervious coverage. Please show all assumed total slag area and call out by a square footage. Please show all existing/previous constructed impervious area and call out by square footage. Please call out the proposed total constructed area of impervious area in square footage.
2. The City of Bethlehem has a Stormwater fee that is adjusted per property by the amount of impervious coverage. One billing unit equals 2101 square feet of impervious coverage and is \$60 a year. Please use caution on what you considered to be impervious. We normally use any buildings, parking lots, driveways and service roads, this includes areas capped with crushed stone.
3. Stormwater Management Report dated May 31, 2024 may still be required to be submitted to LVPC and a copy of their approval letter may be required to be submitted pending on changes.

Sanitary Engineering

1. Contractor has acknowledged that in accordance with Ordinance No. 4342, at the time of a request for a building permit, a sanitary sewer tapping fee of \$2,527 per EDU will need to be paid. The total amount will be determined when a sanitary sewer facilities planning module application is submitted. A cover letter, describing the project, and a utility plan shall be included in the planning module submittal. Please note that building permits cannot be issued until the Planning Module is reviewed and approved by the Pennsylvania Department of Environmental Protection.

Miscellaneous Engineering

1. All other engineering comments addressed.
2. Per Article 925, Appendix A, a stormwater escrow charge of \$0.10 per SF may be assessed upon the increase in impervious coverage area requested to be submitted in the above stormwater comments.

Water

1. Additional comments may be provided under separate cover.

FIRE

1. A fire hydrant shall be added to the Access Road on the East side of the building.
 - a. **Access road width with a hydrant.** Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet (7925 mm), exclusive of shoulders (see Figure D103.1). This will need to be addressed on the east side of the building where 26' Driveway width shall be extended to the northeast corner of the proposed addition.
2. Relocate the proposed "new" hydrant shown on the submitted drawings away from the building. Note: this hydrant was removed from the current submittal. Fire Hydrant spacing on the property shall not exceed 500' between hydrants; Ref. IFC 507.5.1.

ZONING

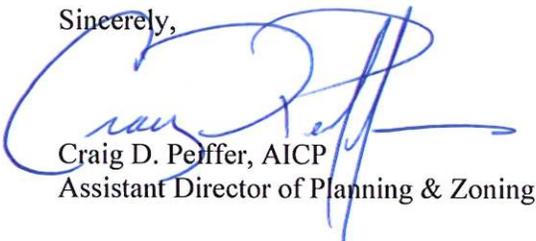
1. For purposes of verifying tree clearing limits, dimension and verify that adequate clearing to the rear of the building is shown to meet both 'Fire Lane' and eventual building code 'Clear Yard' requirements (either 40' or 60' depending upon eventual building design).

GENERAL

1. Sheet CO.2, General Notes, Zoning Data, correct, "Required Twp" to "Required City."
2. Sheet CO.2, Revision Block, Revision 2-correc the date to 1/16/25.
3. Sheet C7.2, Four wall packs are readily apparent on the plan; however, nine are listed on the Luminaire Schedule. Verify the count and location.
4. Comment Response Letter, dated January 16, 2025, excluded or inadvertently omitted responses to previously issued General Comments 4-9:
 - a. Indicate method(s) of deterring or prohibiting vehicle ingress from Easton Road onto the driveway to be severed by the construction of the building addition.
 - b. A Recreation Fee of \$11,411.90 [$\$1,200 + (100,000 \times .10) + (4,238 \times .05)$] shall be paid at the time of a request for a building permit.
 - c. Comments, if applicable, from the Lehigh and Northampton Transit Authority (LANTA) will be issued under separate cover. *LANTA has since replied with no comments.*
 - d. Comments, if applicable, from the Environmental Advisory Committee (EAC) will be issued under separate cover. *EAC has since replied, see attached and include a response to this letter.*
 - e. The project should generally comply with the goals and objectives of the City's Climate Action Plan for new development, including energy efficient construction, provisions for safe walking and biking, green development and other various provisions.
 - f. 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, Alex Miller, 610.865.7085, or amiller@bethlehem-pa.gov.

This item will be placed on the February 13, 2025 Planning Commission Meeting Agenda.

Sincerely,



Craig D. Peffer, AICP
Assistant Director of Planning & Zoning

C. Basel Yandem
Adam Herbold
Craig Baer
Olivia Teel

Robert Taylor
Greg Cryder
Mike Halbfoerster

Peter Wong,
Beacon Rock Realty, LLC

Enclosure



February 5, 2025

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

Dear Mr. Peiffer,

We appreciate the opportunity to comment on the proposed building expansion on LVIP VII, located at 1355 & 1405 Easton Road, Lots 53 & 54. 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 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 water conservation and indoor air quality measures. In addition, a green roof would contribute to lessening the heat island effect, help lower the temperature inside the building and aid in stormwater management.

Furthermore, we strongly recommend that the developer perform a solar assessment, and if feasible, include a rooftop solar system. At a minimum, the building could be constructed with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date. 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, water conservation and indoor air quality measure 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.

The Sustainable Energy Fund (SEF) administers the C-PACE program for Northampton County and can provide information on the program (www.theSEF.org). In addition, there are currently tax credits for new solar energy systems. The savings in electricity realized by a solar energy system may equal or exceed the cost of electricity for the building.

Stormwater control, to be coordinated with the City Department of Public Works, is especially crucial with this project given its proximity to Saucon Creek and its floodplain, and by extension the Lehigh River, which was named the seventh most endangered river in the U.S. by American Rivers. Given the important recreational and habitat value of Saucon Creek, runoff from the roof and parking lot, which include contaminants such as heavy metals, should not enter the creek directly. All stormwater could be directed to green infrastructure, such as vegetated swales, retention basins and rain gardens to avoid untreated stormwater from directly entering Saucon Creek. In addition to slowing stormwater to allow sediments to settle and preventing erosion and flooding of the creek, green infrastructure aids in the filtration of pollutants.

Landscaping is important and we recommend consulting with the City Forester in the selection of native species for trees and bushes around the building that will best tolerate the increasing heat and precipitation resulting from climate change. Rather than a green lawn surrounding the building, consideration could be given to using native plants/grasses that will retain soil, provide pollinator habitat and do not need to be mowed. This low maintenance measure would provide a savings on landscape services and reduce greenhouse gas emissions from mowing.

We commend the inclusion of bicycle parking. The CAP recommends "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9).

If not planned, we suggest the addition of level 2 EV charging stations, another strategy in the CAP (Transportation Strategies T3.1 and T3.4). There may be rebates or tax incentives for these stations. If possible, we suggest wiring the area for additional charging stations for future use.

Thank you for your consideration.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Steve Olshevski

Mandy Tolino

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds