



CITY OF BETHLEHEM

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

BUREAU OF PLANNING AND ZONING

Phone: 610-865-7088

Fax: 610-865-7330

TDD: 610-865-7086

April 5, 2019

HRP Management, LLC
Attn: Duane A. Wagner
190 Broadhead Road
Suite #110
Bethlehem, PA 18018

RE: (19-002LD Master Plan) – #19030007– Martin Tower Complex Master Plan Review – 1170 Eighth Avenue, Ward 13, Zoned OMU, Plans dated March 11, 2019.

Mr. Wagner:

The Overall Master Plan for the Martin Tower Complex is required by and reviewed against Section 1314 of the Zoning Ordinance. The Section reads, in part, “The Overall Master Plan shall be designed to reflect the overall provisions of the Purpose section of Article 1311, Design Standards.” As outlined in the Design Standards, the purposes of the section include:

- (a) Encourage appropriate redevelopment and reuse of underutilized sites.
- (b) Promote a mix of appropriate light business and residential uses in the same building.
- (c) Expand use of the public transit system and pedestrian and bicycle circulation.
- (d) Create opportunities to live, shop and work in the same area.
- (e) Improve the appearance of the City’s commercial corridors.
- (f) Attract new customers and new sources of employment and tax revenue.
- (g) Encourage principals of Smart Growth to promote compact mixed-use development.

The following comments were developed with these standards in mind. The Master plan lacks much of the information necessary for a thorough engineering or traffic evaluation and has been reviewed only for general conformance to City of Bethlehem standards to the extent permitted by the limited detail provided. Additional comments will be provided when a more detailed plan is submitted for review.

General

1. 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.
2. Parking between 8th Avenue, Eaton Avenue and the fronts of buildings should be minimized. The current configuration does not meet design guidelines. In addition, for the main “interior streets”, parking between the interior street and the new buildings should be reduced to minimize parking along new street corridors.
3. Opportunities to integrate uses through things like design and shared parking should be maximized.
4. The development proposes more than 500 dwelling units on the site, but they appear to be uniform in design and unit type. A variation of housing types and design should be incorporated on the site to allow for a variety of residents and greater sustainability of the site. For example, consideration could be given to mixed use buildings with residences above non-residential uses, twins, townhomes, etc.

5. Each of the uses provides a significantly greater number of parking spaces than what are required by the Zoning Ordinance. Parking should be minimized provide a reduction of impervious coverage, allow for greater opportunity for greenspace and landscaping and to provide for greater opportunity for additional uses.
6. The ordinance requires 10% of the lot to be held in open space. Virtually all of the designated open space is on steeply sloped and heavily wooded land. Opportunities for gathering and open space should also be included within the site itself. This could be shared space for both the residential and nonresidential areas of the site.
7. The Overall Master Plan must show how the development is proposed to be phased, whether any new lot lines are to be created and whether any areas are proposed to be dedicated to the City.
8. 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.
9. The Master Plan should retain and include design elements that reflect the history and heritage of the site. This is being done very successfully on the BethlehemWorks property in south Bethlehem.
10. The plan shows the detention pond as a stormwater facility on a sloped and heavily wooded area of the site. We recommend that the site include infiltration and other alternative measures for stormwater management other than a detention pond if at all possible. If a pond is necessary it should not be located on sloped or wooded areas; it could be incorporated as an amenity at the interior of the site and could possibly be a focal point for passive recreation.
11. 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.
12. Appropriate outdoor seating and other outdoor amenities shall be included in the design of the restaurants and retail uses.
13. Additional amenities including such things as landscaped outdoor sitting areas, playgrounds, pavilions, dog runs, gazebos and other recreation facilities shall be considered as the residential complex is further designed.
14. To the east of the Martin Tower site is the Burnside Plantation, which is listed on the National Register of Historic Places, and Lehigh County park land. The Plan shall include protections to the historic site related to building height and setback as required in the Ordinance. The Plan shall also protect the historic site from additional impacts such as noise, stormwater runoff, viewshed, lighting, etc.
15. An existing tree inventory is required prior to the removal of any trees so that the requirements for tree replacement in Section 1318.28 can be documented.
16. A prior development plan for the site created a design package of streetscape elements for a Tower District. Some of those elements, particularly streetlights, were actually utilized and installed in abutting developments. Therefore, those design elements should still be considered for this site for consistency.

Engineering

1. Confirm if the internal roadways are proposed to remain private or if the developer intends to dedicate the roadways to the City. It is the City’s preference that the roads remain private.

Traffic

1. A full traffic study will be required. A meeting with the City and the City’s Traffic Consultant will be necessary to determine the final scope of the study. However, the study will at least include existing issues at Eaton and Schoenersville, access management, 8th & Eaton and left turns, Mauch Chunk and Elizabeth, 8th Ave between Schoenersville Rd and SR378, etc. Roundabouts shall be considered at both Eaton Ave and Schoenersville and at Mauch Chunk and Elizabeth Ave intersections.
2. Access management:
 - a. Remove the western access on Eaton Avenue
 - b. The center access onto Eaton Avenue should be reviewed to determine if it should possibly be right in/right out or have a signal.
 - c. A new left turn lane will be necessary on 8th Avenue heading south for new entrance on 8th Ave.

Forestry

1. It seems that most of the areas designated as 'open space' are at the perimeter of the property on land that may not have been suitable for building. Additional open space and landscaped space needs to be integrated into the shopping and living areas. Trees, shrubs, and other vegetation help mitigate the effects of increased stormwater runoff, energy consumption, and noise and light pollution produced by large expanses of impervious surface such as buildings and paving.
2. Driving lanes, buildings, trees, and parking areas are all in repetitive, monotonous straight lines. Provide some relief from this dull predictability by creating more interest and variety with angled building/parking areas, curved or meandering driving lanes and accesses, and more natural and uncontrived landscaped areas.
3. Create larger planting areas between the site and Eaton Ave and Eighth Ave. Wider planting areas can support larger, more desirable, shade trees and will provide space for accompanying vegetation in the form of larger shrubs, ornamental grasses, and perennials.
4. Increase the greenspace between the commercial area and the residential area to define the uses and add more appealing visual interest while providing some modicum of privacy for the residents.
5. The 'walking trail' surrounding the site consists mostly of sidewalks surrounding the parking lots. While the sidewalks do provide a means of pedestrian transportation, their placement does not encourage recreational activity nor do they provide any visual or physical diversity, interest, or stimulation.
6. Allow a wider planting strip between the curb and sidewalk along 8th & Eaton Avenues to allow for substantial street trees in keeping with what exists along abutting areas of these corridors.

Fire

1. The architect/engineer must confirm Fire Department vehicles have the required turning space to access all areas. (See attached turning radius information for our largest vehicle.) Please submit a turning plan.
2. All buildings less than 30 feet in height must have 20 foot wide, minimum, access road(s). All buildings 30 feet or greater in height must have 26 foot wide, minimum, access road(s) and must accommodate a fire apparatus weighing 84,000 lbs. (Refer to International Fire Code, 2015 ed., Section 503 and Appendix D for additional information.) At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building. (Refer to International Fire Code, 2015 ed., Section 503 and Appendix D for additional information.)

The following comments are not specific to the Overall Master Plan at this time, but will be important as the project moves forward to final design review.

Stormwater

1. A Stormwater Management Report is required and shall be submitted to LVPC and a copy of their approval letter shall be included in a future submission.
2. The City's stormwater management ordinance, Article 925, is currently being updated. The new standards will include additional water quality improvements.

Sanitary

1. In accordance with Ordinance No. 4342, at the time of execution of the Developer's Agreement, a sanitary sewer tapping fee will need to be paid. The developer shall submit a cover letter explaining the project along with a sanitary sewage planning module. A tapping fee will be calculated after review of the proposed sanitary flows.
2. Existing sanitary sewer connections shall be capped. This must occur prior to demolition. Capping permits are required from Public Works.

Miscellaneous Engineering

2. An Erosion and Sediment Control Plan is required and shall be reviewed by DEP. A copy of the NPDES Permit will be required.
3. Copies of all approved Highway Occupancy Permits from PennDOT shall be submitted.
4. All properties will be given addresses at the time of land development review.

Fire

1. A Knox Box for City of Bethlehem Fire Department access must be installed on each building.
2. Identify all buildings that will be fully sprinklered.
3. Indicate the location of all Fire Department Connections (FDC). The FDC must be in a visible location. Fire department connections shall be located on the street side of buildings, fully visible and recognizable from the street or nearest point of fire department vehicle access or as otherwise approved by the fire chief. (IFC 912.2.1) It must be within 200 feet of a fire hydrant. Please add note: "Any change in the location of the Fire Department Connection must be approved by the City of Bethlehem Fire Department."
4. All 'Fire Lanes' must be identified and properly marked. (Refer to International Fire Code, 2015 ed., Section 503 and Appendix D for additional information.)
5. Dead end fire access roadways may have a maximum length of 150' without a turnaround. (Refer to International Fire Code, 2015 ed., Section 503 and Appendix D for additional information.)
6. The architect/engineer must confirm Fire Department apparatus will be able to drive on all road surfaces without contacting the driving surface. Check angles of approach and departure to confirm the front or rear apparatus bumpers will not contact the driving surface. Also confirm the middle of the truck will not contact the driving surface of humps or crowns such as on speed bumps. (Refer to International Fire Code, 2015 ed., Section 503 and Appendix D for additional information.)
7. The project must meet the following ordinance requirement if applicable:
"1701.02, Additions and Modifications, IBC 903.4.2 Alarms. Approved audible devices shall be connected to every automatic sprinkler system. Such sprinkler water flow alarm devices shall be activated by water flow equivalent to the flow of a single sprinkler of the smallest orifice size installed in the system. Alarm devices shall be provided on the exterior of the building in an approved location. Where a fire alarm system is installed, actuation of the automatic sprinkler system shall actuate the building fire alarm system. In automatic sprinkler systems where multiple sprinkler risers are required, and the risers are located in separate areas within the building, an outside visible alarm notification appliance shall be required for each riser. Such appliance shall be a white strobe (minimum 95 candela strobe rating) placed in an approved location on the exterior wall, as close as practicable, to each sprinkler riser. The strobe will activate when the water flow alarm for its respective riser is activated. (Ord. 2014-21 – Passed 8/5/14)"
8. Contact the Fire Department at 610-865-7143 and request Fire Marshal Craig Baer (cbaer@bethlehem-pa.gov) or Chief Fire Inspector Michael Reich at (mreich@bethlehem-pa.gov) with any questions regarding Fire Code requirements.

These comments will be reviewed at the April 11, 2019 Planning Commission meeting. Colored site plan drawings and elevations shall be brought to the meeting for public review and presentation.

Sincerely,



Darlene Heller, AICP
Director of Planning and Zoning

Cc: M. Dorner
A. Rohrbach
T. Wells
M. Reich
L. Smith
L.D. Ronca