



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

January 31, 2023

Dear Ms. Heller and Mr. Peiffer,

The Bethlehem City Environmental Advisory Council appreciates the opportunity to comment on the revised Master Plan for Tower Place development, 1170 8th Avenue. Our recommendations are in support of Bethlehem City's Climate Action Plan, 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, the Department of Planning & Zoning and the Planning Commission in 2016, 2019, 2021 and 2022. 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, buffers adjacent to the Monocacy Creek and Burnside Plantation, green stormwater infrastructure and renewable energy, remain unchanged.

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 comments and recommendations based on the revised 2023 Master Plan.

Parking/Pavements

- Inclusion of podium parking is a positive change to the Master Plan.
- Consider permeable, porous or cool pavements to combat heat and help filter stormwater.
- Angled parking spaces would allow narrowing of access roadways and larger medians.
- Lots 2 and 4: Consider moving parking to the other side of the building.

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, remove pollutants and sediments from runoff and improve air quality.

- Compensate for the felling of mature trees. The EAC strongly recommends 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.
- Trees should not be sacrificed in the creation of the new Nature Trail.

Green space:

Like trees, 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.

- Areas of green space interspersed between buildings should incorporate native, pollinator friendly vegetation as opposed to lawns that required high maintenance.

Buffer area:

The natural corridors that abut 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. We cannot judge the proposed buffer width from the plans.
- 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 channeling it offsite.
- The stormwater retention pond should be designed to accommodate predicted precipitation events that account for the impact of climate change on rainfall amounts and frequency.
- We recommend that the detention pond incorporate natural habitat for wildlife.
- 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.

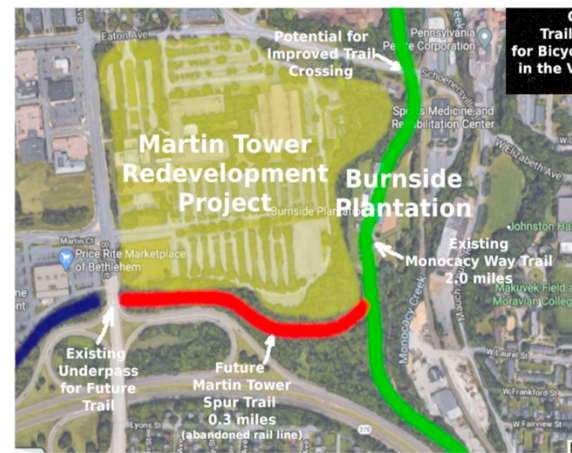
- We urge the developer to complete a solar assessment for solar panels on all buildings and in parking lots.
- Install solar panels where feasible. Note that there are currently tax credits for new solar systems. Furthermore, Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) 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. Note that C-PACE has been expanded to include projects for multi-family dwellings, IAQ and resilience.
- Install electric vehicle charging stations in both residential and commercial sections of the development.

Bike friendly

- In their letter of April 2021, the Coalition for Appropriate Transportation (CAT) diagramed a potential spur to connect the north-south D&L Trail to an east-west corridor from Burnside Plantation to Allentown. Please see the explanation and diagram excerpted from their letter below, which the EAC supports.

This moment is an excellent opportunity to link the developer's proposed businesses and residences by way of the adjoining Monocacy Way trail and an abandoned tree covered railroad spur that heads west under 8th Avenue to Pennsylvania Avenue, ending just shy of Airport Road. In 20 or 50 years when we look back on this project, it could be seen as kickstarting a crucial branch of east-west multi-use rail trail that will have connected so many west and north Bethlehem neighborhoods with these businesses, downtown, and Bethlehem's Memorial and Illick's Mill Parks. This off-street trail connection would provide both recreation and useful human-powered transportation opportunities in-line with the [City of Bethlehem's Climate Action Plan](#) and LVPC's regional [Walk/Roll/V Active Transportation Plan](#). It is specifically identified in 2016's "[BETH CONNECTS: A Trail Study for the Bethlehem Area](#)"

While a 2+ mile rail trail might seem ambitious out of the gate, a starting point with this project should be to connect the Monocacy Way trail to 8th Avenue, a 0.3 mile long section that follows the southern border of the Martin Tower project. (shown in red as Future Martin Tower Spur Trail" in the image to the right)



Potential trail connections around Martin Tower site (CAT concept)

- 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/outdoor 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

Honorable Members of City Council

Scott Slingerland, P.E., Executive Director, CAT