10 East Church Street
Bethlehem, Pa. 18018
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April 10, 2019

Robert Melosky, Chair
Bethlehem City Planning Commission
10 East Church Street
Bethlehem, Pa. 18018

Dear Chair Melosky, Ms. Cohen, Mr. Barker, Mr. Malozi and Mr. Stelatto,

The Bethlehem Environmental Advisory Council (EAC) was established under Article 146 to be advisory to and to coordinate its activities with elected officials, the planning commission and other such local governmental agencies. Some of the powers stated in the Article include:

- Make recommendations as to the possible use of open land areas and/or environmentally sensitive lands within the City of Bethlehem and its surrounding areas.
- Advise Bethlehem City Council, City of Bethlehem Departments and the Administration upon issues of energy conservation.
- Review subdivision and land development plans as appropriate.
- Recommend plans and programs to the appropriate agencies for the promotion and conservation of the natural resources and for the protection and improvement of the quality of the environment within the City of Bethlehem and its surrounding areas.

In our letter of December 2016 we commented on the proposed development of the Martin Tower property. The letter is attached for your consideration, since the recommendations stand today. As it states, we have the opportunity to redevelop this site into a showpiece of sustainable design, as encouraged by the City's Comprehensive Plan, and every effort should be made to employ these principles.

We have reviewed the concept plan and offer the following recommendations.

Density

- Consolidate uses and cluster commercial buildings

Parking

- There is no apparent reason to exceed the amount of parking spots required by the City. Required parking in the proposed commercial area is exceeded by 250 spaces, which translates to approximately an acre of additional pavement. Required parking spaces for the apartment complex is 1.75 spaces/unit. According to the plan, this translates to an excess of 139 spaces for over a half an acre of additional paved surface.
- Utilize permeable pavement
- Use shared parking
- Angled parking spaces would allow narrowing of access roadways.
- Parking garages in lieu of surface parking would reduce stormwater runoff and mitigate the heat island effect. The elimination of mature trees, which currently shade existing pavement, would cause more heat to be absorbed and retained by the lots.
- Consider parking underneath apartment buildings

Trees

Note that existing trees have a higher carbon sequestration capacity than new plantings.

- Inventory existing trees
- Every effort should be made to preserve and retain existing trees. Compensate for felling of mature trees. Recommend replacement on a 2 to 1 basis.

Green space:

Green spaces slow and filter stormwater runoff, mitigate the heat island effect and provide habitat for the wildlife that currently inhabit the property. 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 relieves stress.

- Recommend larger 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.

- The minimum buffer adjacent to wooded areas and slopes should be increased to 200 feet.
- Light from buildings and parking lots should be directed inward so that it does not encroach upon open space, disrupting native species and impacting their behavior.

Stormwater management

Traditional methods of stormwater management don't 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 is also going to have to comply with permitting requirements for Municipal Separate Stormwater Sewer Systems (MS4).

- Stormwater management onsite should be integrated and include the removal of contaminants as opposed to only channeling it offsite.
- Pollutants from the gas station and contaminants from automobiles and salt are of particular concern. Permeable pavement would allow for greater infiltration. Natural swales and wetlands would absorb and filter storm water and provide wildlife habitat.

Energy

- Complete a solar assessment for solar panels on buildings and in parking lots or on top of garages.
- Install solar panels where feasible.
- Install electric vehicle charging stations in both residential and commercial sections of the development.

In addition to the recommendations above, we suggest that the scale on future plans be changed to 1:6 for ease of review by all.

Respectfully yours,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend	Kathy Fox	Mike Topping
Elisabeth Cichonski	Brian Hillard	

cc: Darlene Heller, Director of Planning & Zoning
Mayor Donchez
City Council