



**Lehigh Valley Planning Commission**

**STEVEN GLICKMAN**  
Chair

**CHRISTOPHER AMATO**  
Vice Chair

**KEVIN SCHMIDT**  
Treasurer

**BECKY A. BRADLEY, AICP**  
Executive Director

**COMPREHENSIVE PLANNING COMMITTEE MEETING**  
Tuesday, September 20<sup>th</sup>, 2022, 12:00 noon  
**AGENDA**

**Roll Call**

**Ordinance/Plan Reviews and Information for September 2022:**

1. *ACTION ITEM*: City of Bethlehem, Lehigh County – Land Use of Regional Significance – Tower Place (BGR)
2. *ACTION ITEM*: Bethlehem Township – Zoning Ordinance Map Amendment – Mixed Use Overlay District Designation (BGR)
3. *ACTION ITEM*: Williams Township – Zoning Ordinance Amendment – Zoning Permit Application (JS)
4. *INFORMATION ITEM*: Borough Residential Redevelopment (DS, SN, BGR)
5. *INFORMATION ITEM*: Trend in Self Storage Facility Proposals (DS, SN, BGR)

**Other Business:**

1. *INFORMATION ITEM*: Green Building United Sustainable Warehouse Partner Event (MA)
  - a. Friday, September 23, 8:30 am to 11:30 am
  - b. At Lafayette College, Rockwell Integrated Science Center
  - c. Register: <https://greenbuildingunited.org/events/sustainable-warehouse-forum>

**Next Comprehensive Planning Committee Meeting:**  
October 25, 2022 at 12:00 pm



## Lehigh Valley Planning Commission

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Executive Director

September 9, 2022

Ms. Darlene Heller  
10 E. Church Street  
Bethlehem, PA 18018

**RE: Tower Place – Land Use of Regional Significance  
City of Bethlehem  
Lehigh County**

Dear Ms. Heller:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Both meetings will be virtual and occur on:

- LVPC Comprehensive Planning Committee Meeting
  - Tuesday, September 20, 2022 at 12:00 PM
  - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
  - Thursday, September 22, 2022, at 7:00 PM
  - <https://lvpc.org/meetings.html>

The subject application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the 'Office Buildings Land Use Category'. This proposal is the first part of a phased development at 1170 8th Avenue (parcel number 642821984933 and 642821195996). It conceptualizes subdividing the 52.67-acre parcel into three separate lots, to redevelop the Martin Tower site, constructing two three-story medical office buildings, parking, and associated facilities totaling 101,821 square feet on two of the lots with the third lot to be developed in the future.

The LVPC offers the following comments:

### **Reuse and Redevelopment in Urban Areas**

The location of this development proposal supports reuse and redevelopment within an urban area (Policy 1.1). With a view to 'Encourage quality, sustainable design and construction' (of Policy 1.2), the LVPC suggests that some aspects of the design could

be modified to support the overall goals of both FutureLV: The Regional Plan and the City of Bethlehem.

This development possesses a unique opportunity to incorporate sustainable designs that would complement the character of the area while minimizing environmental impacts. One opportunity is through sustainable and enhanced parking lot design which combines abundant vegetation, pervious paving materials, safe pedestrian, cyclist and ADA access, as well as, connections to transit. This is especially important in an urban environment where there is existing density paired with new development.

If possible, the addition of ample vegetation and pervious materials would help to 'Reduce climate change impacts through mitigation and adaption' (of Policy 3.4) and provide alternative measures of stormwater management. Landscape diversity throughout parking lots breaks up monotony and creates visual interest. Landscaping can be used to interrupt large impervious expansions. This is both visually appealing and helps to mitigate the heat island effect which is created because parking lots emit the sun's heat more than natural landscapes do. Additional landscaping could help to protect the nearby Monocacy Way Trail, Burnside Plantation, existing tree cover on other portions of the site and Monocacy Creek itself and would 'match development intensity with sustainable infrastructure' and 'encourage quality, sustainable design and construction' (of Policies 1.1 and 1.2). This also, would help to create quality, sustainable design, and construction (of Policy 1.2) and would 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2).

The LVPC applauds the inclusion of street trees along 8<sup>th</sup> Avenue and Eaton Avenue which supports Policy 5.3 to 'Promote street trees'.

### **Connectivity**

This location offers an excellent opportunity to incorporate multimodal transportation and universal design to create space that will be accessible to all modes of transportation in an area with high pedestrian and transit use. The LVPC commends the addition of sidewalks that will connect with the existing sidewalks around the parameters of the development along 8<sup>th</sup> Avenue and Eaton Avenue.

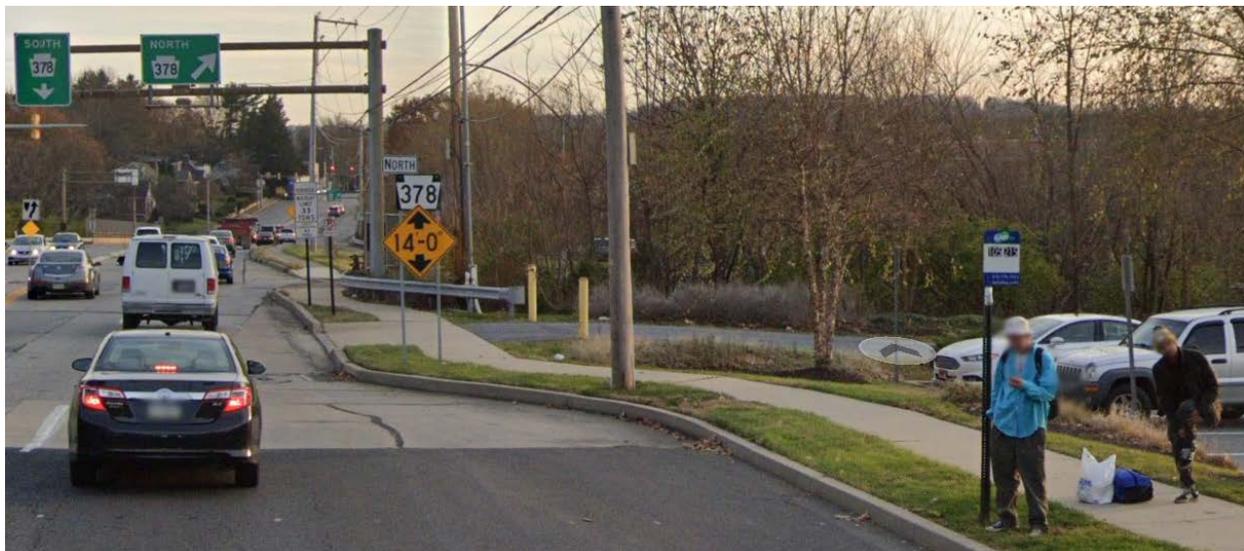
The proposal does not link the sidewalk network into the complex across the parking lots, however. The LVPC recommends that, in addition to including continuous sidewalks on the outside parameters of the development, pedestrian walkways be included in and around the interior of both parking lots. This would 'Ensure transportation accessibility for all persons, 'Improve connections between bus stops and pedestrian and bicycle infrastructure' (of Policy 5.2), and create an accessible area that is well connected for access by everyone.

Planning for safe pedestrian circulation within the development is important for employees and patients including those who will be accessing the facilities via one of the bus stops located along 8<sup>th</sup> Avenue and using the sidewalk network as part of their transportation route. This will support pedestrian safe access through the parking lots to

the building entrances and 'Strengthen sidewalk, bike route and trail infrastructure' (Policy 5.3)

The LVPC recommends that clearly marked crosswalks be added or improved at the following intersections that will lead into and bring foot traffic to and from the development: The intersection of 8<sup>th</sup> Avenue and Eaton Avenue covering all four directional crossings, at the proposed connection from Plaza Drive crossing 8<sup>th</sup> Avenue and from Martin Court, crossing 8<sup>th</sup> Avenue to Martin Tower Road, and at the proposed road access coming off Eaton Avenue.

The Lehigh and Northampton Transportation Authority (LANTA) operates public transportation service to the project with two northbound bus service stops along the frontage along 8th Avenue and a third southbound at the 8th Avenue and Martin Court intersection.



LANTA bus stop located at 8th Avenue and Martin Court intersection

A 10-foot by 8-foot concrete shelter pad fronting the sidewalk as well as a five-foot concrete pad in between the existing sidewalk and the curb for a proper American with Disabilities Act (ADA) compliant landing pad should be added to each of the two existing bus stops running northbound along 8<sup>th</sup> Avenue. This will allow both employees and patients using public transportation to easily board and descend with full ADA clearances. This would improve equitable access to jobs by means of 'improving mixed-transportation access to areas with high or growing employment opportunities' (of Policy 4.3).

The LVPC urges adding bus shelters with seating and trash receptacles to the two northbound service locations along the property frontage on 8th Avenue. The LVPC strongly encourages continued early engagement with LANTA to discuss these bus stop recommendations. LANTA Planner/Land Use Specialist Molly Wood can be contacted by e-mail [mwood@lantabus-pa.gov](mailto:mwood@lantabus-pa.gov) or by phone at 610-776-7433 x165.

### **Additional Amenities**

The LVPC commends the inclusion of streetlights that incorporate design elements that are consistent with streetlights used by other developments in this area which ‘Promotes context-specific design solutions’ (of Policy 5.4) as well as public safety.

Outdoor seating should be incorporated into the design for patients and staff. This is especially important as the proposed developments are intended for medical uses and those coming in and out of the buildings may require a sitting area. Having seating available outside supports ‘Safe, Healthy, Inclusive and Livable Communities’ (Goal 5) which ‘reduces depression, anxiety, and stress’ (Healthy Communities Theme). An example of an outdoor sitting space that would provide both seating and additional green space can be seen below.



Outdoor seating from Page 125 *FutureLV The Regional Plan*

### **Bicycle Amenities**

The LVPC commends the inclusion of bicycle racks on the building sites which will improve equitable access to jobs by improving ‘mixed-transportation access to areas with high or growing employment opportunities’ (of Policy 4.3) and supports the goal to ‘enhance public transit service and pedestrian and bicycle infrastructure’ (of Policy 2.3).

### **Electric Charging Spaces**

Electric charging should also be planned for and integrated into both passenger vehicle parking lots to plan for the future of electric vehicles (Policy 2.5). Most vehicle manufacturers are eliminating internal combustion vehicle production within the next decades and a very high priority has been placed on transition to an alternative fueled vehicle future by the federal government through the Bi-Partisan Infrastructure Law. The Commonwealth of Pennsylvania has released a complementary plan to advance national and regional goals, as well. Furthermore, addition of electric vehicle charging supports the implementation of City’s Climate Action Plan. Consideration of this opportunity to serve customers and improve air quality over time is appreciated.

### **Transportation Impact Assessment**

The land development plans submitted to the LVPC dated August 3, 2022, were for two medical office buildings, of 60,827 square feet and 38,339 square feet. The Traffic Impact

Assessment submitted was for the entirety of a proposed urban mixed-use project. The full project, according to the Traffic Impact Assessment, is to include 100,000 square feet of medical office building(s), 85,000 square-feet of general office, 24,000 square-feet for a grocery store, 5,585 square feet of convenience store/gas station with 16 vehicle fueling pumps, a 6,500-square-foot high-turnover sit-down restaurant, a 130-room hotel and 312 mid-rise apartments. The LVPC Transportation review attempted to parse out the Medical Office Buildings from the overall Assessment submitted.

The Transportation Impact Assessment should be a Transportation Impact Study based on the scale of the project and daily vehicle trips anticipated to be generated. The developer has noted within the Assessment that they will provide interim transportation studies as development phases and areas of the site develop, to evaluate the impacts on the surrounding roadway network. The Traffic Impact Assessment often states that that it is a study. The developers engineering team should clarify the context and recommendations of the transportation planning of the developer as to either a Traffic Impact Assessment or a Traffic Impact Study and most importantly, what the anticipated effect of this phase of development is as it relates to the Master Site Plan. This will provide needed context and allow for successive phases of the develop to be coordinated.

### **Vehicle Trip Data**

The Traffic Impact Assessment utilized the Institute of Transportation Engineers 10<sup>th</sup> edition *Trip Generation Manual*. The Institute of Transportation Engineers has an 11<sup>th</sup> edition of the *Trip Generation Manual* that should be utilized for Transportation Impact Assessments/Studies as it offers the most current and comprehensive trip generation analysis.

The Executive Summary of the Assessment states that the mixed-use project, when fully developed, will experience a total of 13,983 weekday trips and that the medium volume driveway opposite Plaza Drive will produce 2,518 weekday trips, while the high-volume driveway at Martin Tower Road is expected to produce 7,954 trips per weekday. It does not explain where the remaining 3,511 weekday trips will come from. There is no mention of the right in/right out driveway or Tower Drive trip distribution along Eaton Avenue within the Executive Summary.

The LVPC recommends updating the Executive Summary to reflect all access trip distributions resulting from the development of the two Medical Office Buildings. The Executive Summary should account for any phases for the project and the expected timeline for construction. Ultimately the Pennsylvania Department of Transportation has ownership of 8<sup>th</sup> Avenue (State Route 8011) and Schoenersville Road (State Route 1009). Trip distribution, trip generations and phases should be clearly defined within the Executive Summary of the Assessment especially for the impacts to Eaton Avenue.

Traffic Turn Movement, Headway Calculations, Capacity and Queue Analysis data contained within the Assessment was collected in November 2020 and from March to

June 2021. Traffic volume data was collected from November 13 through the 20th, 2020 utilizing Automatic Traffic Recorders.

Traffic data collection during the 2020 and 2021 timeframes are considered by the Pennsylvania Department of Transportation (PennDOT) as traffic data potentially being lower than normal due to the COVID-19 Pandemic. While there are COVID adjustments provided in the amount of 15% within the Assessment, this may not reflect current conditions. It is recommended that the developer's transportation engineering team conduct new traffic data collection and update the Assessment to reflect the current conditions of 2022 along the 8<sup>th</sup> Avenue, Eaton Avenue corridors and other studied intersection and roads. In general, the LVPC's traffic monitoring throughout the region has found that trip generation has returned to or now exceeds pre-Pandemic levels.

Eaton Avenue to the east of 8<sup>th</sup> Avenue is a congested corridor as identified in the Congested Management Process. This congested corridor ends at the intersection of 8<sup>th</sup> avenue and Eaton Avenue. This intersection with the proposed development should be analyzed to determine the best practices to help mitigate the congestion that will be exasperated by the development. It should be noted that this corridor was identified in the Congested Management Process documents after the former Martin Tower was essentially vacant, so the former usage of Martin Tower did not resolve or mitigate congestion with its closure in 2007. Mitigation of the incremental development transportation impacts along this corridor should be coordinated with the PennDOT to provide future strategic improvements at key locations, including the intersection of Eaton Avenue and 8<sup>th</sup> Avenue which will 'Reduce transportation related emissions' (of Policy 2.2)

### **Construction Phasing Plan**

The LVPC recommends that the developer construct all transportation improvements suggested within the Conclusion Segment of the Assessment or update the Assessment to be a Traffic Impact Study and propose timing of the improvements as each element of the urban mixed-use development is constructed. Phasing of projects of this scale can be a challenging endeavor. However, the impacts to the surrounding community can be more challenging if the transportation network is not aligned with the construction being done, in the phase when it is being done. A clearly defined development and transportation network phasing plan is vital to mitigating the impact on the surrounding community during the construction phase if done incrementally.

### **Character-Defining Areas**

Character-Defining Areas represent the natural and scenic character of the Lehigh Valley and are recommended for parks and open space, woodlands, agriculture, and low-intensity, limited-scale development that preserves natural and scenic resources.

The eastern section of this parcel has woodlands, which are part of a larger character-defining area. Woodlands mitigate environmental stress by reducing stormwater runoff, filtering groundwater recharge, controlling erosion and sedimentation, moderating local

microclimates, and purifying the air. Protecting and managing the region's woodland resources is a goal of *FutureLV: The Regional Plan*.

This current stage of the proposed development is not directly within this character-defining area, however, because of the proximity to it the LVPC strongly encourages that environmentally sustainable practices be employed throughout the development process to protect this area.

### **Steep Slopes**

The outside parameters of this parcel contain steep slopes of 25%. This is outside of where development is currently proposed. The LVPC recommends that large lots with low site coverage standards should be maintained, and special erosion and storm drainage controls enforced to 'Minimize environmental impacts of development to protect the health safety and welfare of the public.' (of Policy 3.2)

### **Karsts**

The mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the presence of surface mines on the site. The LVPC advises the applicant to ensure proper Geotech testing before any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).

### **Stormwater**

The project site is located within the Monocacy Creek Watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments relative to our review of the project's stormwater management plan are included as Attachment 1.

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Sincerely,



Bambi Griffin Rivera  
Community and Regional Planner



Teresa Mackey  
Senior Environmental Planner



Brian Hite  
Transportation Planner



Denjam Khadka  
Senior Civil/Environmental Engineer



Geoffrey A. Reese, PE  
Master Planner and Engineer

CC: HRP Management, LLC, Applicant; Pennoni Associates, Project Engineer/Surveyor; SWB L.R. LTTD., HMLP-MT, LIMITED PARTNERSHIP RMLP-MT, LP 8<sup>TH</sup> 7 EASTON HOLDINGS, LP c/o The Herrick Company, Inc.; Dean Severson, AICP, LVPC Director of Regional Planning; Geoffrey A. Reese, PE, LVPC Master Planner and Engineer; Denjam Khadka, LVPC Senior Civil/Environmental Engineer, Steve Neratko, LVPC Chief Community and Regional Planner



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BECKY A. BRADLEY, AICP  
Executive Director

August 30, 2022

Amanda Raudenbush  
4225 Easton Avenue  
Bethlehem, PA 18020

**RE: Zoning Ordinance Map Amendment – Mixed Use Overlay District Designation  
Bethlehem Township  
Northampton County**

Dear Ms. Raudenbush:

The proposal considers amending the Official Zoning Map of the City of Bethlehem Township Zoning Ordinance Chapter 275 of the Codified Code of the Township of Bethlehem to Provide for the Amendment of Chapter 275, Section 27 of the Codified Code of the Township by rezoning a track of land located at the intersection of Freemansburg Avenue and Wagner Drive containing approximately ten acres of land by adding the mixed-use overlay district designation.

This amendment demonstrates ‘evolution and adaptability of government’ (of Policy 1.1). It supports ‘increasing density of residential and mixed-use development in centers’ (of Policy 1.2) and supports an efficient development process that is responsive to regional needs (Policy 1.4).

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC.

Sincerely,

Bambi Griffin Rivera  
Community and Regional Planner

cc: Laura Zapata, Township Secretary; Samantha Smith, Zoning Officer Bethlehem Township; Doug Bruce, Township Manager; James L. Broughal, Broughal & DeVito, L.L.P.



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BECKY A. BRADLEY, AICP  
Executive Director

September 12, 2022

Mr. Jonathan J. Reiss  
Grim, Biehn & Thatcher  
104 S. Sixth Street  
P.O. Box 215  
Perkasie, PA 18944-00215

**RE: Zoning Ordinance Amendment – Zoning Permit Application  
Williams Township  
Northampton County**

Dear Mr. Reiss:

The subject application proposes amending the Township Zoning Ordinance §27-109 “Permits and Certificates” Paragraph 4(d) “Ownership”, by requiring a letter indicating approval of the permit application by a Homeowner’s Association or Condominium Association, if the property is subject to a relevant association. While this proposal is generally a matter of local concern, the LVPC encourages the Township to reconsider including this provision as a requirement of the zoning application. In an instance where association restrictions are deemed unenforceable, and a zoning application is denied due to lack of an approval letter from the association, the Township may become embroiled in a legal situation. An alternative approach may be to amend the application form or submission instructions to provide a statement for the applicant to acknowledge that the property may be subject to other legal restrictions, and are advised to conduct a title search for such documents as a best practice (of Policy 1.4).

Municipalities, when considering ordinance amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

Jillian Seitz  
Senior Community Planner

CC: Mikal Sabatine, Township Manager  
Katherine Faubert, Township Administrative Assistant