

**RMLP-MT, LP**  
**190 Brodhead Road, Suite #110**  
**Bethlehem, PA 18017**

April 28, 2021

Bethlehem City Council  
10 E. Church Street  
Bethlehem, PA 18018

RE: Martin Tower Property Redevelopment

Dear Members of City Council,

Thank you for your consideration of the zoning ordinance text amendments we have introduced to assist with redevelopment of the Martin Tower property. The purpose of this memo is to address the comments raised by the members of Council during the April 20, 2021 public hearing, as well as those included in Mr. Slingerland's April 14, 2021 letter.

**Text Amendments:**

The requested Amendment to permit more than a single row of parking and a single drive aisle between an arterial road and the primary building is a requirement of the medical office and grocery users.

The medical office user requires that the buildings face 8<sup>th</sup> Avenue and include a 5:1000 SF parking count with sufficient parking near to the entry. In fact, the user deems these characteristics so important to its operations that our agreement permits them to terminate the transaction if the building placement, building orientation and parking count are not compliant.

Shifting the medical buildings to the east does not create additional parking, but rather simply relocates some parking from the rear of the building to the front of the building, greatly enhances vehicular circulation and access at the entry/drop-off canopies, and places amble patron (most of which are elderly) parking nearer to the entry/drop-off canopy.

As depicted on the site plan provided, there are multiple vehicular ingress/egress points serving the lots (i.e. Eaton Ave, Tower Drive, and the new signalized driveway). These multiple access points will disperse traffic and alleviate congestion on the surrounding arterial streets and existing intersections. At the same time, funneling traffic from different directions to a single drive aisle (as currently required) to access the entry/drop-off canopy will result in traffic jams and put patrons walking from the distant parking lots in harm's way.

The grocery operator provided a self-developed site layout conforming to its prototypical store design and ADA parking requirements. The effect of the parking placement Amendment on the grocery use, as currently intended and designed, is the addition of six (6) handicap parking spaces along the building. However, the lease for the intended grocery user is not executed at this time, and a replacement user or use will have its own prototypical building, site design and parking requirements that may differ.

As discussed during the public hearing, the requested text amendments are an efficient means to implement plan modifications necessary to accommodate current and future users of the effected lots and permits building and parking placement consistent with nearly all other developed parcels along the adjacent arterial roads. To the contrary, having to appear before the Zoning Hearing Board and prove a hardship each time relief related to either of the requested amendments is needed is an undue and unreasonable burden that will further delay development of the overall project and individual lots.

The plan reviewed during the public hearing is generally fixed with regard to the internal roadway configuration, however, it is likely that some of the six (6) lots located within the center swath of the plan (i.e. between the apartments and the 8<sup>th</sup> Avenue frontage lots) will be slightly reconfigured as uses are solidified.

**Trees/Plantings:**

We are aware of the City's requirement to provide a new tree to replace each removed tree and will comply with, if not exceed, said requirement. However, please note that removal of the existing trees was not a decision made in haste, but rather because it is necessary to redevelop the property. Each time a new site plan was developed, and there were many, our designers always attempted to layout the buildings and parking in a manner that would allow some of the existing trees to remain. Unfortunately, having new buildings disbursed throughout the site (as opposed to concentrated along the east/west ridge in the preexisting condition), will require substantial cut/fill grading that would damage the root systems and kill the trees. Therefore, the decision was made to remove the existing trees and provide new trees complimentary to project.

**Shared Parking / Greenspace:**

If there is an opportunity to implement "shared parking" as additional users are secured, we will strive to do so, as we do not benefit in any way by providing more parking than required by Ordinance to any use or user. Said another way, a developer would always rather have twice the building – the component that generates money – and half the parking – the component that incurs cost.

The parking depicted on the site plan before Council is either required by a known user (i.e. medical office, grocery, apartments, etc.), or anticipated to be required by a conceptual user (i.e. hotel, restaurant, retail). Specific to the medical component, it must be noted that many of the surrounding medical users (i.e. St. Luke's, Bethlehem Eye, etc.) either leased or sought to lease parking on the Martin Tower property because their facilities are operationally under-parked, even though developed in accordance with the City's parking requirements.

As noted above, the six (6) lots located between the 8<sup>th</sup> Avenue frontage lots and the multi-family residential portion are conceptual and, therefore, subject to change as users are secured. We anticipate that there will be opportunities to incorporate shared parking and additional greenspace within these areas once the building sizes and parking requirements are known.

Nearly 11 acres of the overall 52 acres will remain as contiguous open space located to the east along the Burnside Plantation, to the northeast along Schoenersville Road, and to the southeast along the Norfolk Southern rail line. Additionally, substantial greenspace is provided throughout the 12 acres slated for multi-family residential development.

**Impervious Coverage:**

In the post-development condition, there is only a slight increase in impervious area located in the southwest corner of the site where the convenience store/gas facility is proposed – an area Bethlehem Steel previously prepared (i.e. utilities) for an additional office building. The limits of the proposed development are effectively the same as the preexisting-development, and we are preserving all of the existing wooded/forested areas. Of course, if there is an opportunity to decrease impervious area as future users are determined, we will strive to meet that goal.

**Stormwater:**

We recognize and appreciate the City's stormwater enhancement initiative. The property is located within an Act 167 Provisional No Detention Area such that, in its current state, there are no detention basins or other features to provide rate control or water quality enhancements prior to the stormwater runoff reaching the Monocacy Creek.

As part of the redevelopment, rate control and water quality enhancements will be provided by way of (i) a new stormwater detention basin that will reduce the current flow rate to the Monocacy and allow suspended solids to settle in the basin before stormwater is discharged to the Monocacy Creek, and (ii) a spray irrigation system that will recharge a portion of the basin stormwater through on-site irrigation. Therefore, the stormwater controls in the post-development condition will be a net benefit to the Monocacy Creek.

**Traffic:**

When the Lowes project was being developed, substantial off-site improvements to 8<sup>th</sup> Avenue and Martin Court, and the preexisting Martin Tower property was assumed (Traffic Study) to be a 4,500-employee office complex with the majority of its associated traffic (ADTs) categorized as Weekday Morning Peak Hour and Evening Peak Hour trips.

Our proposed redevelopment project is projected to generate 40% less traffic than the assumed traffic in the preexisting condition. An updated traffic study has been provided to PennDOT and the City.

**Walkability / Rails to Trails:**

To promote and enhance walkability, we are proposing (i) a new sidewalk connection from the Eaton/Schoenersville intersection to the Trail entrance at the Burnside Plantation driveway, (ii) a sidewalk connection to the Burnside Plantation, (iii) a perimeter walking trail starting at 8<sup>th</sup> Avenue and traveling along the south and east development limits, and (iv) sidewalks along the internal roads. Painted bicycle lanes along the interior streets will be considered.

We are aware of the City's initiative to improve the condition of the Monocacy Way Trail, including an improved Trail crossing at Schoenersville Road, and will contribute towards those efforts.

The land comprising the 0.3 mile future trail along the southern boundary of the Martin Tower property is currently owned by Norfolk Southern and, therefore, we are not able to provide a connection at this time. However, if the City ever purchases the land, we will certainly cooperate in creating the connection.

**Burnside Plantation Viewscape:**

Perspective views looking towards the multi-family residential from the Burnside Plantation are attached. Due to the tall and dense tree canopy of the wooded/forested buffer, coupled with a 45’ elevation change from the average ground level at Burnside (low) to the ground level at Martin Tower (high), the multi-family residential buildings will not be visible through the foliage, and only slightly visible during the winter months.

**CRIZ:**

We have had many conversations with the Administration regarding CRIZ and already agreed to initially decertify more than 3.5 acres comprising the proposed internal roads as part of the subdivision and public improvements dedication process. Due to differing financial models and user demands related to CRIZ, the decertification of additional acreage will be determined as the complete redevelopment plan and/or individual lot transactions are solidified.

**Affordable Housing:**

We recognize and appreciate the City’s affordable housing initiative and have been exploring the option in connection with other available incentives. At the same time, please consider that the Martin Tower property is by far the most expensive land in the Lehigh Valley due to the environmental remediation and demolition costs incurred in preparation for redevelopment. In fact, the pro rata cost of the multi-family acreage far exceeds its fair market value. As noted by Mr. Wagner during the public hearing, the current intent is market-rate housing, however, we will continue discussions with the Administration and exhaust all available options.

**Tax Revenue:**

Although there were no comments or questions during the public hearing regarding the current and projected tax revenues, I feel that tax revenues are an equally important consideration. Below is a summary of current and projected tax revenues – detailed calculations are attached.

	Assessment	City	School	County	Total
Current Taxes	\$1,767,500	\$10,693	\$32,964	\$6,681	\$50,338
Projected Taxes	<u>\$95,510,788</u>	<u>\$577,840</u>	<u>\$1,781,276</u>	<u>\$361,031</u>	<u>\$2,720,147</u>
Incremental Increase	\$93,743,288	\$567,147	\$1,748,312	\$354,350	\$2,669,809

**Summation:**

Mr. Herrick and I have been involved in the Martin Tower property for nearly fifteen years – including through the great recession and the current pandemic. We have invested tens of millions of dollars to date and will be investing tens of millions more to complete the project. In addition to the dollars invested, our team has expended thousands of hours pursuing hundreds of prospective users for the site to no avail. Simply stated, the Martin Tower redevelopment is a complicated project that will require both cooperation and compromise by all concerned parties to make it happen.

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The uses proposed for the 8<sup>th</sup> Avenue frontage lots (i.e. medical, grocery, C-store/Gas) are the lynchpin to proceeding with redevelopment of the property, including the apartments. The requested text amendments are necessary to securing these users and, consequently, necessary for the project to incrementally increase tax revenues to the City of Bethlehem, the Bethlehem Area School District, and Northampton County. The project will also create hundreds of construction and permanent jobs in the City.

Should you have any questions concerning the above or attached, please do not hesitate to contact me by phone at 610.972.2008 or email at [LDRonca@RoncaDevelopment.com](mailto:LDRonca@RoncaDevelopment.com). I will also be available to answer any questions during the May 4<sup>th</sup> Council meeting.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'LD Ronca', with a stylized flourish at the end.

Lewis D. Ronca

cc: Mayor Donchez  
Alicia Karner

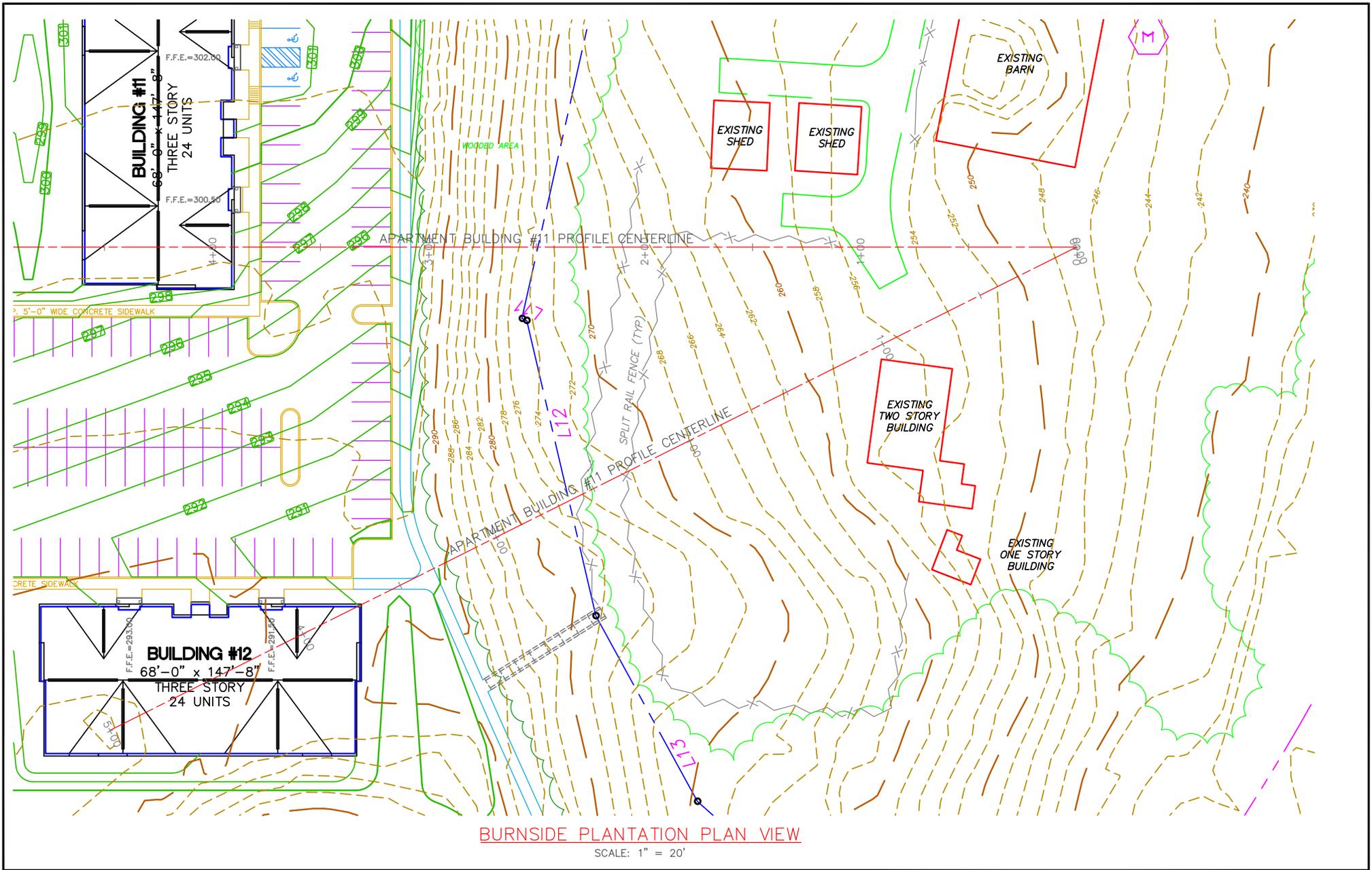
MT - Real Estate Tax Projections 042121.xlsx

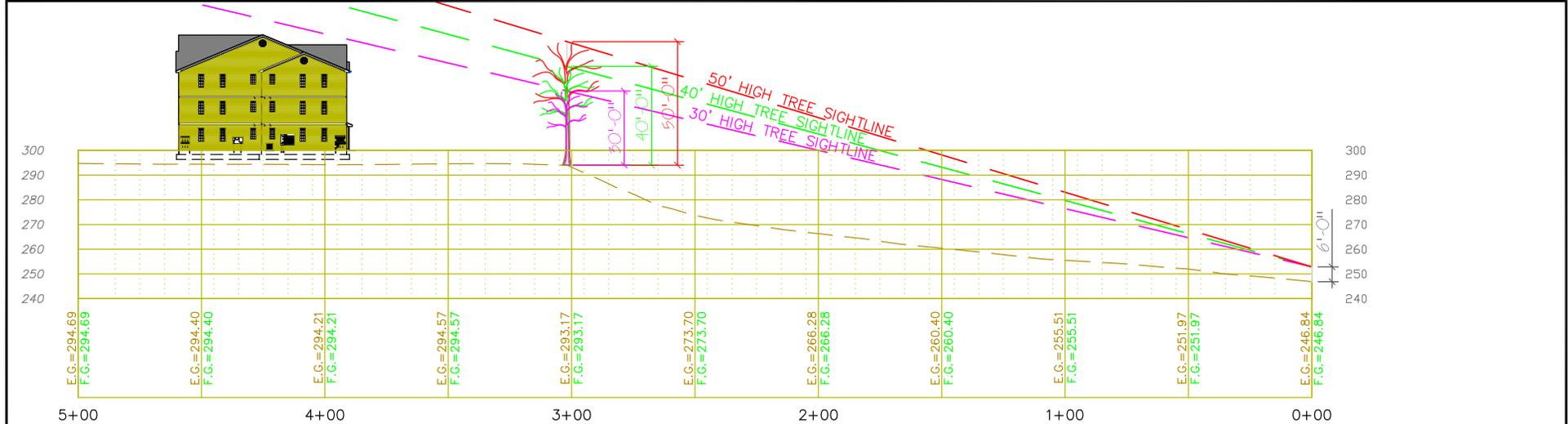
<b>EXISTING ASSESSMENT &amp; TAX REVENUE</b>							
<u>LOT</u>	<u>LOCATION</u>	<u>LOT AREA</u>	<u>EXISTING ASSESSMENT</u>	<u>CITY TAXES</u>	<u>COUNTY TAXES</u>	<u>SCHOOL TAXES</u>	<u>TOTAL TAXES</u>
1	Tower Parcel	7.6 Acres	\$237,500	\$1,437	\$898	\$4,429	\$6,764
2	Remainder Parcel	44 Acres	\$1,530,000	\$9,257	\$5,783	\$28,535	\$43,574
<b>TOTALS</b>			<b>\$1,767,500</b>	<b>\$10,693</b>	<b>\$6,681</b>	<b>\$32,964</b>	<b>\$50,338</b>

<b>POST DEVELOPMENT PROJECTED ASSESSMENT &amp; TAX REVENUES</b>								
<u>LOT</u>	<u>USE</u>	<u>BLDG AREA</u>	<u>ASSESSMENT/SF</u>	<u>PROJECTED ASSESSMENT</u>	<u>CITY TAXES</u>	<u>COUNTY TAXES</u>	<u>SCHOOL TAXES</u>	<u>TOTAL TAXES</u>
1	Medical Office	60,828	\$189	\$11,496,487	\$69,554	\$43,457	\$214,409	\$327,420
2	Medical Office	40,000	\$189	\$7,559,996	\$45,738	\$28,577	\$140,994	\$215,309
3	Retail - Single User	31,042	\$84	\$2,607,570	\$15,776	\$9,857	\$48,631	\$74,264
4	Gas/Conv Store	5,585	\$729	\$4,071,892	\$24,635	\$15,392	\$75,941	\$115,967
5	Retail - Single User	29,896	\$84	\$2,511,304	\$15,193	\$9,493	\$46,836	\$71,522
6	Restaurant	8,167	\$321	\$2,618,558	\$15,842	\$9,898	\$48,836	\$74,577
7	Restaurant	7,085	\$321	\$2,271,640	\$13,743	\$8,587	\$42,366	\$64,696
8	Hotel (Per Room)	130	\$75,917	\$9,869,167	\$59,708	\$37,305	\$184,060	\$281,074
9	Office / Vet	25,160	\$132	\$3,317,473	\$20,071	\$12,540	\$61,871	\$94,482
10	Office/General	40,000	\$132	\$5,274,201	\$31,909	\$19,936	\$98,364	\$150,209
11	Apartments (Per Unit)	312	\$140,745	\$43,912,500	\$265,671	\$165,989	\$818,968	\$1,250,628
<b>TOTALS</b>				<b>\$95,510,788</b>	<b>\$577,840</b>	<b>\$361,031</b>	<b>\$1,781,276</b>	<b>\$2,720,147</b>

<b>SAMPLE ASSESSMENT DATA</b>						
	<u>USE</u>	<u>BLDG AREA</u>	<u>ASSESSMENT</u>	<u>ASSESS/SF</u>	<u>USER</u>	<u>ADDRESS</u>
1	Medical Office	22,518	\$4,255,900	\$189	St. Luke's Medical Offices	834 Eaton Avenue, City of Bethlehem
2	Retail - Single User	35,528	\$2,984,400	\$84	Price Rite Grocery	1001 8th Avenue, City of Bethlehem
3	Gas/Conv Store	5,771	\$4,207,500	\$729	Wawa	1584 8th Avenue, City of Bethlehem
4	Restaurant	6,574	\$2,107,800	\$321	Outback Steakhouse	800 N Krocks Road, Lower Macungie
5	Hotel	132	\$10,021,000	\$75,917	Springhill Suites	3800 West Drive, Center Valley
6	Office (General)	16,776	\$2,212,000	\$132	Office Building/Bank Branch	924 Eaton Avenue, City of Bethlehem
7	Apartments	208	\$29,275,000	\$140,745	Woodmont Mews	1345 Martin Court, City of Bethlehem

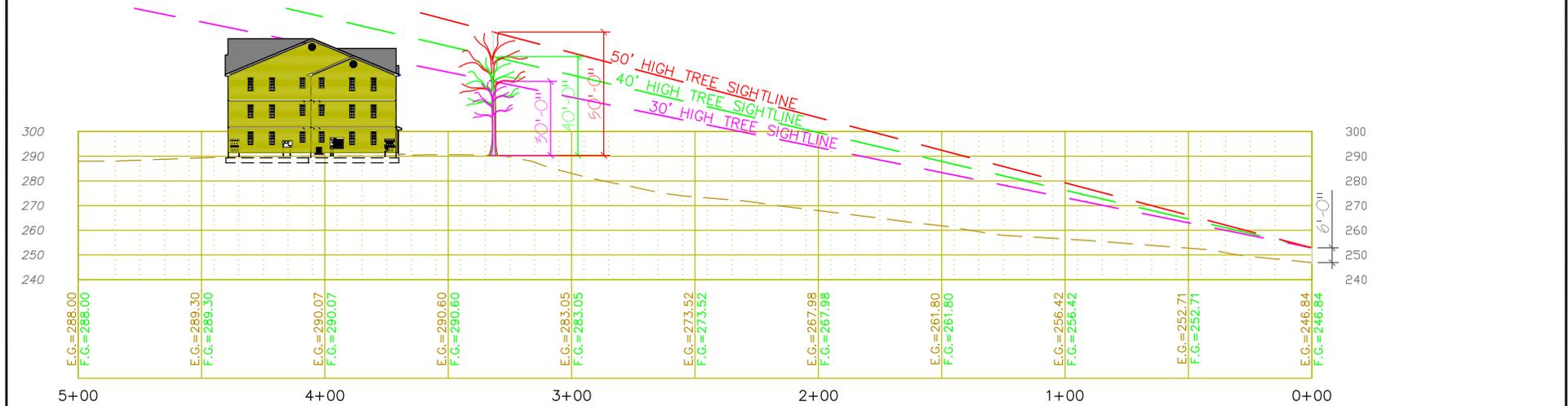
<b>CURRENT MILLAGE DATA</b>	
City Millage:	6.05
County Millage:	3.78
School Millage:	18.65





APARTMENT BUILDING #11 PROFILE VIEW

SCALE: 1" = 20' HORIZ.  
1" = 20' VERT.



APARTMENT BUILDING #12 PROFILE VIEW

SCALE: 1" = 20' HORIZ.  
1" = 20' VERT.