



# CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

Phone: 610-865-7088

Fax: 610-865-7330

TDD: 610-865-7086

February 6, 2020

Denis Keenan  
French & Parrello Associates  
1 W. Broad Street, Suite 140  
Bethlehem, PA 18018

RE: (19-010LD) – 19110006 – 77 Wind Creek Blvd. Hotel Expansion Land Development Plan  
– Ward 17, Zoned IR, Plan dated November 11, 2019 and last revised January 21, 2020

Dear Mr. Keenan:

The above-referenced plan has been reviewed by the appropriate offices, subject to the following conditions:

## **ENGINEERING**

1. A stormwater fee of \$4,051 is required for the increase in impervious coverage.
2. In accordance with Ordinance No. 4342, at the time of execution of the developer's agreement, a sanitary sewer tapping fee of \$570,597 will need to be paid. Please note that building permits cannot be issued until the Planning Module is reviewed and approved by the Pennsylvania Department of Environmental Protection.
3. The existing utility easement will need to be revised. It is suggested that the revised easement not be recorded until after the relocation is complete. Language will be added to the Developer's Agreement to capture this.
4. The Soil Erosion & Sediment Control Report, dated November 11, 2019, shall be reviewed by DEP and a copy of the NPDES permit shall be submitted to the City.
5. An engineer's opinion of probable costs shall be submitted for review and used in preparing the Developer's Agreement.

## **Public Works – Traffic**

1. The City requests that the developer copy the City on all correspondence with LVPC and PennDOT.
2. The City Traffic Consultant's comments dated January 27, 2020 are enclosed and must be complied with regarding an expanded traffic study, cooperation with an acceptable plan to improve access along E. 1<sup>st</sup> and E. 2<sup>nd</sup> Streets, and coordination with PennDOT regarding traffic signal modifications along the 4<sup>th</sup> Street corridor.

## **ZONING**

1. The Site Demolition Plan and all Landscaping Plans, including the Colored Landscaping Exhibit, must be consistent with one another regarding the area of disturbance. Submit 2 revised sets of Colored Landscaping Exhibits with future submissions.
2. Parking lot landscaping compliance cannot be fully determined until all parking spaces to be disturbed and re-stripped, with island relocations and all relevant notations, are clearly indicated on all plans listed in number 1 above. For example, the Landscape Compliance Chart on Sheet 12 of 19 indicates 101

- spaces within the project area, but the Landscape Plan only shows 22 striped spaces. Likewise, the Site Plan on Sheet 5 of 19 and the Overall Site Plan (Sheet 2) does not clearly indicate the project area containing the 101 parking spaces. It appears only the Colored Landscape Exhibit depicts these spaces.
3. The Landscaping Details Compliance Chart, #5, indicates the total amount of trees 8" or greater in diameter to be removed. These 38 replacement trees are in addition to all landscaping requirements and must meet the requirements of street trees as per Section 1318.28.a.
  4. The entire project (gaming facility with proposed addition) contains sufficient off street parking, but the listing of those parking spaces/deck spaces and their general location in a summary chart is necessary.
  5. Correct the parking formula for the Event Center and the Multi-Purpose Space on the parking tables on Sheet 2 of 19.

## GENERAL

1. A recreation fee of \$86,500 shall be paid prior to finalizing the Developer's Agreement.
2. Comments from the Bethlehem Environmental Advisory Council found in the attached letter dated December 11, 2019 shall be considered. Please comment on the energy efficiency measures listed in paragraphs 3 and 4 at the Planning Commission meeting.
3. The industrial structure (Relic Press) located in the traffic circle is proposed to be removed upon changing the traffic pattern in that area. Clarify how the Relic Press will be relocated or repurposed. When the gaming facility was originally designed and access was laid out, it was done in a way that retained as many historic and prominent relics as possible. It is important to retain and reuse the relics that remain on the site. We understand Wind Creek is evaluating the feasibility of relocating the Relic Press. Once decided, all plans indicating its demolition shall be upgraded.
4. In its letter dated December 30, 2019, LVPC recommends additional traffic studies at various locations, including the site driveway intersections with Daly Avenue, Founders Way & East 3<sup>rd</sup> Street, Stefko Boulevard and Daly Avenue, and E. 4<sup>th</sup> Street and Daly Avenue. This is consistent with the City Traffic Consultant's letter dated January 27, 2020.
5. Change the Planning Bureau signature block to "Planning Commission". We will provide the proper format to you. Also, add this signature block to Sheets 1 and 2. Both must be recorded.
6. Add a signature block for Northampton County Recorder of Deeds on Sheets 1 and 2 also.

This plan will be placed on the February 13, 2020 Planning Commission Agenda. Please email a pdf of the overall site plan for the City's website and bring colored site plans and colored elevation drawings on boards with a flash drive corresponding to each board for use at the meeting.

Sincerely,



Darlene Heller, AICP  
Director of Planning and Zoning

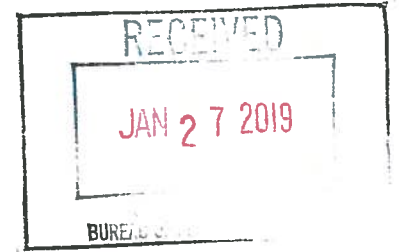
Cc: M. Dorner  
A. Rohrbach  
T. Wells  
C. Peiffer  
Wind Creek Bethlehem LLC, C/O Nicholas Talvaccitary, ESQ.  
L. Rothman, EAC

Enclosures



1727 Jonathan Street • Allentown, PA 18104  
Phone: (610) 776-6700 • Fax: (610) 776-1190 • www.bencivil.com

January 27, 2020



Ms. Tracy Samuelson  
City of Bethlehem  
10 E. Church Street  
Bethlehem, PA 18018

RE: Review # 1 Wind Creek Casino Expansion  
Northampton Co. Bethlehem, PA  
*Benchmark* Project No. 038067

Dear Tracy:

*Benchmark* has reviewed the Final Site Plan for Wind Creek Bethlehem Hotel and Conference Center Expansion dated 11/11/19 which was prepared by French & Parrelo Associates and the Wind Creek Hotel/Mice Bethlehem Expansion Site Trip Generation & Traffic Impact Study dated November 9, 2019 which was prepared by Lublanecki Engineering, Inc. *Benchmark* has also received the Lehigh Valley Planning Commission (LVPC) Review letter dated December 30, 2019.

1. The traffic study appropriately identifies the existing event traffic and provides acceptable projections for the peak event traffic with the completion of the proposed expansion. The peak event traffic demand is not projected to overlap with the typical weekday morning and evening peak periods.
2. The LVPC review letter requests that the traffic study include analysis of the following intersections:
  - Site Driveway intersections with Daly Avenue
  - Founders Way and East Third Street
  - Stefko Boulevard and Daly Avenue
  - East Fourth Street and Daly Avenue.

*Benchmark* concurs that these intersections should be included in the study and should be evaluated for the AM and PM weekday peak hour periods.

3. Documentation should be provided from PennDOT confirming that the highway occupancy permits issued for site access remain valid.

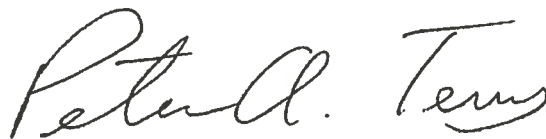
Ms. Tracy Samuelson  
City of Bethlehem  
038067

January 27, 2020

4. With the proposed expansion, there is concern that access to the casino facility from First and Second Streets will be relied upon to a greater extent. Especially during the numerous events which occur in this area, these roadways are sometimes closed or restricted. The developer should work with the City to develop a plan to improve access to and from the site along First and Second Streets.
5. The developer's traffic engineer should coordinate with City Staff and PennDOT to coordinate any traffic signal modifications with the coordinated and interconnect traffic signals along the 4<sup>th</sup> Street (South Side Corridor).

If you have any questions please do not hesitate to contact me.

Sincerely,



Peter A. Terry, P.E., PTOE, PMP, RSP12

PAT/slc  
Tiffany Wells  
Darlene Heller  
Melissa Maupin

*Denis Keenan, F&P*



Darlene L. Heller, Director of Planning and Zoning  
Tracy Samuelson, Assistant Director of Planning and Zoning  
City of Bethlehem  
10 E. Church Street  
Bethlehem, PA 18018

December 11, 2019

Dear Ms. Heller and Ms. Samuelson,

As Bethlehem City embarks on a Climate Action Plan to reduce our carbon footprint, increase our sustainability and utilize alternative energy sources, let us be mindful of these goals as they pertain to new development.

We appreciate the chance to comment on the proposal by Wind Creek Hospitality for a new hotel and have the following comments and questions.

Has the developer assessed 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 to reduce infiltration?

In addition, has the developer considered including solar panels or constructing the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date? Wind Creek may not be aware that Northampton County recently 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.

New construction projects provide opportunities to employ ambitious energy saving strategies and reduce pollution from traditional energy sources, helping to preserve our environment and maintain the health of our citizens. Wind Creek has an opportunity to be a model for other developments in our City and at the same time reap notable financial benefits from energy savings.

We appreciate the attention to detail in the plan regarding tree replacement and support the City's requirement that trees be replaced at a minimum of one to one.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend

Elisabeth Cichonski

Brian Hillard

Brian Nicas

Mike Topping

cc: Bethlehem City Council

Mayor Donchez