



November 22, 2023

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

Dear Ms. Heller and Mr. Peiffer,

We appreciate the opportunity to comment on the preliminary sketch plan for a proposed mixed-use development at 1323-1339 E. 4<sup>th</sup> Street. Our recommendations are in support of Bethlehem City's Climate Action Plan (CAP), which aims to reduce our carbon footprint, increase sustainability, utilize alternative energy sources and promote resilience to changing climate conditions.

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 to reduce infiltration. A green roof would also contribute to lessening the heat island effect, which is of concern, especially as the climate continues to warm. Green roofs also help lower the heat inside the building and aid in stormwater management.

Furthermore, especially in this early stage of the project, we strongly recommend that the developer evaluate the inclusion of solar panels, which can be done at no cost by a solar energy contractor. If solar is feasible now or in the future, the building can be constructed with adequate structural rooftop capacity and electrical rough-ins to support a solar energy system.

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.

C-PACE has recently been expanded to allow for multi-family developments. The Sustainable Energy Fund (SEF) administers the C-PACE program for Northampton and Lehigh Counties and can provide information on the program ([www.theSEF.org](http://www.theSEF.org)). Note that there are currently tax credits for new solar energy systems.

In order to make the site more conducive to bicyclists and as an added amenity to residents, we suggest the inclusion of bicycle parking. The CAP recommends the inclusion of "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9). Therefore, we recommend the inclusion of bicycle parking. In addition, we encourage the addition of EV charging stations, which is also a strategy in the CAP.

Green infrastructure to slow stormwater and filter pollutants from the parking lot should be included to the greatest extent possible. Permeable pavement in the parking lot may also help with stormwater management. We suggest that the selection of native species be coordinated with the City Forester. This is especially important since the changing climate could impact the optimum selection.

Finally, there may be a better option for the dumpster than facing Steel Avenue.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Mandy Tolino

Mike Topping

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds