

10 East Church Street

Bethlehem, Pa. 18018

[www.bethlehemeac.org](http://www.bethlehemeac.org)

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

 August 30, 2021

Dear Ms. Heller and Ms. Samuelson,

We appreciate the opportunity to comment on the proposed development at 14-36 W. 3rd Street. Our recommendations are in support of Bethlehem City’s Climate Action Plan (CAP), which aims to reduce our carbon footprint, increase sustainability and utilize alternative energy sources.

New construction projects provide opportunities to employ energy saving strategies that will lower the business’ energy costs, while at the same time reduce pollution from traditional energy sources. Therefore, we strongly recommend that the developer explore 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 contribute to lessening the heat island effect, which is of great concern on the Southside of Bethlehem, especially as the climate continues to warm,  Green roofs also help lower the heat inside the building and aid in stormwater management.

Furthermore, we encourage the developer to evaluate the inclusion of solar panels or at least constructing the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date.

Northampton and Lehigh Counties 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. In addition, the federal government offers renewable energy tax credits.

Whenever possible, existing trees should be preserved. Landscaping is important and we recommend coordinating with the City Forester in the selection of native species for both street trees along the front of the building as well as trees and landscaping in the back of the building. Increased greenery along the street will also soften the building’s impact and make it more inviting.

We support the collaboration with the City’s Department of Public Works with regard to stormwater management and with the City Traffic Engineer to lessen the impacts on traffic during construction and address the impact of additional vehicles resulting from 87 new residential units.

Due to the height of the building and what appear to be large windows on all sides, we note the potential for bird impacts. We suggest that the design, location and lighting of the building be evaluated for potential collision risk. It is possible to purchase glass made specifically to reduce bird flight impacts and bird kills, known as bird friendly glass. The following links to brief educational videos, made in collaboration with Muhlenberg College, speak to this issue and how and how it can be addressed.

[Bird Safe Glass Explained: The Issue](https://www.youtube.com/watch?v=AHNWS9fxLuQ)

[Bird Safe Glass Explained: Solutions](https://www.youtube.com/watch?v=txyqmFiOabE)

Other recommendations are the inclusion of bicycle racks for residents and visitors and a building setback as wide as possible to allow for easy flow of pedestrians. Both are in keeping with the goals of the CAP to make the City more pedestrian/bike friendly for the health of our residents and to reduce greenhouse gas emissions.

Thank you for your consideration.

Sincerely,

 **Lynn Rothman**

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend Ben Guthrie

Elisabeth Cichonski Brian Nicas

Ben Felzer Mike Topping

cc: Bethlehem City Council

 Mayor Donchez