



December 11, 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 proposed development at 1747, 1742 and 1800 Elliot Avenue. 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.

The development of this property contradicts the City's steep slope ordinance and tree ordinance and consequently does not have the endorsement of the EAC. We are aware, however, that the developer has received a variance from the Zoning Hearing Board with regard to minimum lot area and maximum impervious coverage in steep areas for this project.

The applicant plans to remove 80% of the current tree canopy on the site. If not already completed, we recommend an inventory of the total number and species of trees to be removed and a detailed plan for replacement be created. This would be in addition to trees required for street trees and for the parking lot. Note that mature existing trees have a higher carbon sequestration capacity than new plantings. 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. The City Forester will review all plans for restoration.

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, should this development proceed, 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.

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.

Lehigh 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 and it is possible that this development would qualify. 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). Furthermore, there are currently tax credits for new solar energy systems.

The CAP recommends the inclusion of "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9). We commend the inclusion of bicycle parking. In addition, we strongly recommend the addition of EV charging stations, which is also a strategy in the CAP. There may be federal tax incentives associated with the installation of EV chargers.

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 Reynold