



July 6, 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 2105 Creek Road for the construction of three single-family detached dwellings. Our recommendation is 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.

This property is located in a Special Flood Hazard Area, Zone AE, (100 year-floodplain). The EAC strongly recommends that the City not allow development in the 100-year floodplain, as supported by FEMA. Allowing development on the floodplain sets a precedent for future development proposals on the floodplain in Bethlehem City. In addition, the sketch plan provided does not provide details of the project's impact.

The 100-year floodplain is susceptible to flooding and important for stormwater management, in keeping with the City's current mandate under the Municipal Separate Stormwater Sewer System (MS4) program. The existing property, in a mostly undeveloped state, acts to slow and retain stormwater and provides a filtration system for pollutants contained in stormwater. Please note that as the earth continues to warm, the frequency of storm events and the amount of precipitation during storm events will increase. Allowing floodplains to function and absorb floodwaters is critical and is in keeping with the goals of the City's Climate Action Plan.

Creek Road has been shown to flood and building on the floodplain creates a potentially hazardous situation during storm events for those that may need emergency medical attention and for emergency responders, as well as parking issues, when cars would have to be moved to another location.

This natural stormwater control system is particularly important because the site borders Saucon Creek, a "Class A Trophy Trout" stream. The proposed development would add impervious area to the property. Large volumes of fast flowing stormwater can scour streambanks and destroy

riparian buffers, which shade and thereby cool the water, as well as provide unique wildlife habitat. Saucon Creek is a valuable resource to Bethlehem City. Residents and visitors enjoy fishing, picnicking, walking and biking along its banks in nearby Saucon Park.

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