



10 East Church Street
Bethlehem, Pa. 18018
eacbethlehempa@gmail.com

August 20, 2020

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

Dear Ms. Heller,

This letter regards the request before the Zoning Hearing Board for a Use Variance to permit single-family semi-detached dwellings (also known as Twin Dwellings) at 2105 Creek Road. The Bethlehem Environmental Advisory Council strongly recommends that a variance not be granted for the reasons stated below.

The property is located in the 100-year floodplain, an area susceptible to flooding and crucial to 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. As climate change causes rain events to become more frequent and severe, allowing floodplains to function and absorb floodwaters is critical and is in keeping with the goals of the Climate Action Plan that the City is currently creating.

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, including access roads and driveways. Contaminants from parking areas could be carried to Saucon Creek in stormwater runoff. 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. The property itself appears to be part of a wildlife corridor.

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. We advise the Bethlehem Zoning Hearing Board and City Council not to allow a variance that has the potential to negatively impact Saucon Creek and increase flooding, including to the proposed dwellings.

We request that our letter be part of the public record for both the August 26th Zoning Hearing Board meeting as well as the September 15th City Council meeting.

Thank you for your consideration.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend

Elisabeth Cichonski

Ben Felzer

Ben Guthrie

Brian Nicas

Mike Topping

cc: Bethlehem City Council

Mayor Donchez