



March 28, 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 218-226 W. Union Blvd. 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.

The EAC strongly recommends that the City not allow development in the 100-year floodplain, as supported by FEMA. Building on the floodplain creates a potentially hazardous situation for those that may need emergency medical attention and for emergency responders, as well as a parking problem during storm events when cars would have to be moved to another location. In addition, pollutants from the parking lot would be carried directly into the Monocacy Creek by overflowing stormwater. Furthermore, allowing development on the floodplain sets a precedent for future development proposals on the floodplain in Bethlehem City.

Building on a floodplain increases the impacts of flooding at the site and downstream by increasing the impervious area. We understand that the proposed building will be elevated and that the developer determined that the existing compacted stone is completely impervious, resulting in the determination that the new parking lot will not increase the total impervious area.

Please note that as the earth continues to warm, the frequency of storm events and the amount of precipitation during storm events will increase and this ought to be taken into account when calculating the capacity of the stormwater control system on the property. In addition to the trees, vegetation could be planted onsite to help absorb and slow floodwaters.

If this development is approved, as always, we advise energy saving strategies that will lower energy costs and at the same time reduce pollution from traditional energy sources. Therefore, we would 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.

We urge the developer to perform a solar assessment, and if feasible, include a rooftop solar energy system. At a minimum the building could be constructed with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date. Note that there are currently tax credits for new solar energy systems.

In addition, 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. It is anticipated that Northampton County will approve and include this new provision in early 2023.

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