



10 East Church Street
Bethlehem, Pa. 18018
www.bethlehemeac.org

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

April 21, 2023

Dear Ms. Heller and Mr. Peiffer,

We appreciate the opportunity to comment on the proposed development at 25 West 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 energy costs and at the same time reduce pollution from traditional energy sources. Therefore, 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. Green roofs also help lower the heat inside the building and aid in stormwater management.

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

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.

Another recommendation is the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9). Therefore, we recommend the inclusion of bicycle parking. Furthermore, we encourage the addition of electric vehicle charging stations, which is also a strategy in the CAP.

Of special concern with this project is the proximity to the Lehigh River, which was just named the seventh most endangered river in the U.S. by American Rivers. Green infrastructure to slow stormwater and filter pollutants from the parking lot should be included to the greatest extent possible. We commend the inclusion of a rain garden in the landscaping plan and suggest signage to educate the public about how it functions. The selection of native species for both trees and shrubs be coordinated with the City Forester, as the changing climate and other factors may impact the optimum selection.

Due to the height of the building and the abundance of large windows, we note the potential for bird impacts. Birds are not capable of seeing glass, which is either clear (see-through) or reflective. When windows in a building line-up with one another, birds often see habitat on the far side and try to fly through to it, often hitting with a terrible and fatal force. According to Dr. Daniel Klem Jr., “Every year up to one billion birds are killed or fatally injured colliding with glass windows in North America alone.”

Therefore, we recommend 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. Please let us know if you would like more information.

[Bird Safe Glass Explained: The Issue](#)

[Bird Safe Glass Explained: Solutions](#)

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