



July 10, 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 3769 Commerce Center Blvd. Lot 5. 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.

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 contribute to lessening the heat island effect, which is of great concern on the Southside of Bethlehem, especially as the climate continues to warm. Green roofs also help lower the heat inside the building and aid in stormwater management.

Furthermore, we strongly recommend that the developer perform a solar assessment and evaluate the inclusion of solar panels on the entire building and constructing the addition with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date.

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. The Sustainable Energy Fund ([www.theSEF.org](http://www.theSEF.org)) administers the C-PACE program for Northampton and Lehigh Counties and can provide information on the program. Note that there are currently tax credits for new solar energy systems.

The LD Plan states that in 2008 a wetlands study was performed showing wetlands on the northwestern area of the property, within the city limits. It may be prudent to update the delineation. Wetlands are an extremely valuable resource, performing functions such as slowing and absorbing stormwater, filtering pollutants and providing habitat. A permit is required to fill wetlands, however, as a rule they should be preserved and must also be protected during construction. We do not see details on the size or quality of this area.

Trees and landscaping provide cooling, reduce stormwater runoff, improve air quality and sequester carbon. We recommend coordinating with the City Forester in the selection of native species for both trees and landscaping.

Other recommendations are the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9) and the inclusion of EV charging stations.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhor Kumar

Mandy Tolino

Mike Topping

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds