



November 22, 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 925 Bethlehem Drive (Phoenix Tube). 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 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 strongly advise the developer evaluate the inclusion of solar panels, which can be done at no cost by a solar energy contractor. If solar is feasible now or in the future, the building can be constructed with adequate structural rooftop capacity and electrical rough-ins to support a solar energy system.

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 (SEF)

administers the C-PACE program for Northampton County and can provide information on the program (www.theSEF.org). In addition, there are currently tax credits for new solar energy systems. The savings in electricity realized by a solar energy system may equal or exceed the cost of electricity for the building.

We appreciate the inclusion of bicycle parking and encourage the addition of EV charging stations, which is also a strategy in the CAP.

Green infrastructure to slow stormwater and filter pollutants from the parking lot should be included to the greatest extent possible. Permeable pavement in parking lot may also help with stormwater management. We commend the planned replacement of trees greater than eight inches in diameter on a 2:1 basis. We suggest that the selection of native species be coordinated with the City Forester. This is especially important since the changing climate and other factors may impact the optimum selection, as is indicated in the Land Development Plan.

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