



April 5, 2022

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

Dear Ms. Heller and Ms. Samuelson,

We appreciate the opportunity to comment on the proposed development of LVIP VII Lot 63 (2680 Commerce Center 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.

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. In addition, a green roof would contribute to lessening the heat island effect, help lower the temperature inside the building and aid in stormwater management.

Furthermore, we strongly recommend that the developer perform a solar assessment, and if feasible, include a rooftop solar 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. 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.

Stormwater control (to be coordinated with the City Department of Public Works) is especially important with this project given its proximity to a discharge point to East Branch Saucon Creek. We suggest that green infrastructure, such as vegetated swales and

rain gardens, be incorporated to aid in stormwater management. In addition to slowing stormwater and allowing sediments to settle, green infrastructure aids in the filtration of pollutants. Landscaping is important and we recommend coordinating with the City Forester in the selection of native species for trees and bushes around the building.

In order to make the site more bike and pedestrian friendly, we appreciate the inclusion of bicycle parking and, as detailed in comments from LANTA, that this site (as well as Lot 90) is on a public transportation route.

Thank you for your consideration.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend, Vice Chair

Ben Guthrie, Secretary

Ben Felzer

Vibhur Kumar

Mike Topping

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds