



City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

February 27, 2023

Dear Mayor Reynolds, Honorable Members of Council and Mr. Boscola,

As you are aware, Lower Saucon Township voted on December 21, 2022 to rezone 275.7 acres of the Bethlehem Landfill Co. from Rural Agriculture to Light Industrial to pave the way for expansion of the existing landfill. This zoning decision allows the Council to base its decision on conditional use, rather than a special exception, which would have to have been determined by the Zoning Hearing Board.

Today, February 27th, was the first day of the conditional use hearing to determine which parties are allowed to be given party status. At today's hearing, during the first hour both the Cities of Hellertown and Easton asked for, and received, party status. The Easton case was based on increased leachate and odor impacting Hugh Moore Park, while the Hellertown request came from their composting facility based on increased traffic.

The EAC wants to ensure that Bethlehem City is aware of the opportunity to become a party of interest, as our wastewater treatment plant will treat the increased leachate coming from an expanded facility and the D&L Trail passes through the City. While it is still uncertain if there will be another opportunity to seek party status later this week, the City may wish to prepare for that an option by allowing their law team to participate in the next hearing. Achieving party status would allow the City to participate in future hearings, along with Easton and Hellertown, to provide expert witness and testimony.

We know that any necessary changes to the discharge permit as a result of expansion, such as changes in flow or waste strength, will be dealt with separately by the City and the Landfill Co. through the permitting process, ensuring independent oversight by the EPA.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair
On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair
Mandy Tolino

Ben Guthrie, Secretary
Mike Topping

Vibhur Kumar
Katie Trembler