



10 East Church Street  
Bethlehem, Pa. 18018  
eacbethlehempa@gmail.com

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

March 1, 2021

Dear Ms. Heller and Ms. Samuelson,

We appreciate the chance to comment on the proposal for 319-27 S. New Street.

If the project is approved, the EAC has recommendations regarding the building and the surrounding area. As currently proposed, the upper floors would extend over Graham Street with supporting columns extending into the right of way for the Greenway. To compensate for the proposed encroachment on the Greenway, we recommend improvements to the Greenway in coordination with the City. Such improvements could include supplemental lighting, tree planting and additional landscaping incorporating native species designed to attract pollinators and mitigate stormwater runoff. In addition, rain gardens on the Greenway and along the street would assist in storm water runoff, native plant growth and wildlife.

We understand that the project must comply with the S. New Street Streetscape Project. In light of the impacts of climate change, our expectations and hopes are that new developments will go beyond the minimum tree replacement and landscaping requirements and serve as a model for other developments in the City.

Regarding the building, we recommend that the developer explore 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 also has many benefits, for example, temperature regulation inside the building, moderation of the heat island effect in the surrounding area, rainwater retention, improved air quality and an amenity for residents.

Furthermore, we encourage the developer to evaluate including solar panels or at least constructing the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date. Northampton County recently 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.

New construction projects provide opportunities to employ ambitious energy saving strategies that will lower the business' energy costs, while at the same time reduce pollution from traditional energy sources, helping to preserve our environment and maintain the health of our citizens.

As Bethlehem City is finalizing a Climate Action Plan to reduce our carbon footprint, increase our sustainability and utilize alternative energy sources, let us be mindful of these goals as they pertain to new development.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend

Elisabeth Cichonski

Ben Felzer

Ben Guthrie

Brian Nicas

Mike Topping

cc: Bethlehem City Council

Mayor Donchez