



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

September 21, 2022

Dear Ms. Heller and Mr. Peiffer,

The Bethlehem City Environmental Advisory Council appreciates the opportunity to comment on the proposed Tower Place development, 1170 8<sup>th</sup> Avenue. 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.

We commented on the development of the Martin Tower site in letters to City Council and the Planning Commission in 2016, 2019 and 2021. Our concern for the protection of the Monocacy Creek, which abuts the property, and our recommendations that the development incorporate sustainable design, greenery in the form of new trees and landscaping with native species, green stormwater infrastructure and renewable energy, remain unchanged.

As a prime location for a landmark redevelopment, this site could showcase cutting edge green design, respect open space and utilize smart growth principles. Such a design could encompass transit-oriented, walkable, bicycle-friendly land use with mixed use development. The developer has the opportunity to redevelop this site into a showpiece of sustainable design, in keeping with the goals of the City's Climate Action Plan and every effort should be made to employ these principles.

The EAC offers the following recommendations.

**Parking/Pavements**

- Consider permeable, porous or cool pavements to combat heat and help filter stormwater.
- Limit parking spots to the number required by the City.
- Use shared parking.
- Angle parking spaces to allow narrowing of access roadways.

- Parking garages in lieu of surface parking would reduce stormwater runoff and mitigate the heat island effect. Consider parking underneath apartment buildings.

### **Trees**

Note that the mature trees that were cleared had a higher carbon sequestration capacity than new plantings. Trees also provide cooling to counteract the heat, reduce stormwater runoff and improve air quality.

- Compensate for the felling of mature trees. Recommend replacement on a 2 to 1 basis.
- Use native tree species that will be tolerant of changes in climate.
- Plant trees that grow to a larger mature size.
- Ensure that new trees are planted and cared for correctly in both the short and long term. For example, remove the cage around the balled and burlapped trees, dig holes to appropriate depth, water new plantings, etc. We can provide guidance in this respect.

### **Green space:**

Green spaces slow and filter stormwater runoff, mitigate the heat island effect and provide habitat for the wildlife. Furthermore, green space as part of a development creates the opportunity to improve quality of life. Natural light and connection to the environment has been proven to add to productivity and relieve stress.

- Recommend areas of green space interspersed between all buildings.

### **Buffer area:**

Natural corridors surrounding the property support and maintain existing wildlife and absorb storm water runoff.

- Strongly recommend a minimum buffer adjacent to wooded areas and slopes of 200 feet.
- Direct light from buildings and parking lots inward so that it does not encroach upon open space, disrupting native species and impacting their behavior.

### **Stormwater management**

Traditional methods of stormwater management do not account for recent increases in the severity of rainfall events, necessitating the use of innovative methods of storm water control and proactive measures. The City complies with permitting requirements for Municipal Separate Stormwater Sewer Systems (MS4).

- Integrate stormwater management onsite and include the removal of contaminants, as opposed to only channeling it offsite.
- Pollutants and contaminants from automobiles and salt are of particular concern. Natural swales and wetlands would absorb and filter storm water and provide wildlife habitat.

### **Energy**

- 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.

- Complete a solar assessment for solar panels on all buildings and in parking lots or on top of garages.
- Install solar panels where feasible. Note that there are currently tax credits for new solar systems. Furthermore, 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.
- Install electric vehicle charging stations in both residential and commercial sections of the development.

### **Bike friendly**

- Another recommendation is the inclusion of "easily-accessible, secure, sheltered bicycle parking" as recommended in the CAP (Transportation Strategies T1.2 and T1.9). Bicycle parking outside businesses and secure indoor bike parking for residents and visitors alike would be ideal.

### **Bird Window Collisions**

"Peer-reviewed, published research estimates that a minimum average of one million birds collide with windows in the USA daily; 365 - 988 million annually." (Overview and Executive Summary of the Bird collision Working Group Project, Feb. 12, 2020)  
After habitat loss, glass is the biggest killer. The majority of bird strikes occur in low rise (4 stories and less) and residential buildings. We would be happy to provide more information.

- Encourage inclusion of physical barriers in front of glass and/or make glass visible to birds on the outside surface. Many products are available.

Thank you for your consideration.

Respectfully,

*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: Mayor J. William Reynolds  
City Council