



environmental advisory council

10 East Church Street
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April 24, 2016

Dear Members of City Council,

The Bethlehem Environmental Advisory Council (EAC) , has the following recommendations regarding transportation in the City of Bethlehem, specifically the proposed parking garage, which affects the quality of life, health and environment of Bethlehem residents.

The proposed parking garage may have both short term and long-term environmental impacts. Our concerns are that (1) congestion generated by the garage may increase air pollution on the South Side; (2) there is no comprehensive robust plan for parking and other means of transportation to the South Side. Furthermore, we recommend that plans for new structures include sustainable features to the greatest extent possible.

Air pollution on the South Side

Traffic projections of the 3rd Street area have shown that traffic is already overwhelming the infrastructure in the area. A garage placed in that location will likely add to the existing congestion. From an environmental perspective, congestion means that more cars would be idling without going anywhere, giving off pollution without taking their drivers to their destination. The United States Department of Transportation has found that [transportation is a source of air pollution that causes asthma, respiratory illness, heart disease, poor birth outcomes, cancer, and premature death](#). The Lehigh Valley in particular has been ranked as the [14th most polluted region in the nation for particle pollution](#). This pollution is particularly bad on the City's South Side, with [spikes of black carbon particulate matter occurring during rush hours](#). It seems obvious that it is in our best interest as a city to find ways to minimize the pollution from cars. More pollution and congestion may also end up thwarting the City's own goals of encouraging people to live, work, and shop on the South Side. Thus, not only should the project should be planned to alleviate any potential congestion, the planned after studies of this project will be vital in order to study resulting traffic patterns and implement any necessary adjustments.

Transportation and Parking Plan

We recommend that the City develop a robust and holistic plan for transportation and parking that encompasses the entire City, rather than relying only on studies that are project specific and therefore limited in scope. This kind of plan would be key to developing a strategy to minimize air pollution, especially in the City's hot spots. According to the United States Environmental Protection Agency, [utilizing Smart Growth](#)

[a City's environment](#). The EPA has recognized that the way a municipality plans its transportation infrastructure can have a large impact on air pollution from motor vehicles, engines, and the fuels used to operate them and water pollution from the resulting runoff. A problem with this type of parking garage is that it does not fit into any larger parking or transportation plan that could serve as a roadmap to minimizing car traffic.

Increasingly, city planners are creating transit centers for buses and bicycles and encouraging walkability. Residents that live near transit centers are [2 to 5 times more likely to use transit for commuting and non-work trips](#). We strongly support the goals of the recent study BETH CONNECTS: A Trail Study for the Bethlehem Area and the ongoing work of the Coalition for Appropriate Transportation (CAT) and the Citizens Traffic Advisory Committee (CTAC).

We advise the City to commission and adopt a comprehensive transportation and parking plan based on Smart Growth principles to mitigate the effects of future development on the South Side. These recommendations are consistent with the City of Bethlehem's own The 2009 Comprehensive Plan which states that the City should improve safety for pedestrians and bicyclists, encourage more walking and bicycling, and encourage greater transit use by increasing service on the South Side. This is an opportunity to showcase some pro-active planning strategies that are good for the long-term health and wellbeing of Bethlehem residents and the environment.

Sustainable Features

Increasingly, new buildings are designed and built in a way to minimize their impact on the environment. Parking garages are no exception and developers have designed structures with sustainable features that have [reduced their environmental impact](#). Thus, we urge the City to encourage sustainable design in new parking garages.

Thank you for your consideration and attention. Please do not hesitate to ask if you would like more information.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair
On behalf of the Bethlehem EAC

EAC Members:

Fran Cundall
Jack Gambino
Kalyna Procyk
Cathy Reucher
Lynn Rothman
Mike Topping

cc: Mayor Donchez

Links:

<https://www.epa.gov/smartgrowth/our-built-and-natural-environments>

http://www.lehighvalleylive.com/breaking-news/index.ssf/2013/04/lehigh_valley_has_nations_14th.html

<http://salisbury.thelehighvalleypress.com/2013/03/13/state-lehigh-valley-elderly-kids-risk-black-carbon-emissions>

<https://www.epa.gov/smartgrowth/our-built-and-natural-environments>

<http://www.greenparkingcouncil.org/certified-green-garages/certification/>