



February 21, 2025

Craig Peiffer, Assistant Director of Planning and Zoning
City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

Dear Mr. Peiffer,

We appreciate the opportunity to comment on the proposed development on 404 E. 3rd street. 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.

Acknowledgements

- We appreciate the inclusion of indoor bicycle parking with a separate entrance. The CAP recommends "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9).
- Regarding the lack of on-site tenant parking, it is our understanding that the developer will lease parking spaces at the nearby BPA parking garage (please verify). This is an efficient use of space that leverages existing investments, and also encourages the use of alternate transportation (e.g. walking, bicycles, or public transportation).

Strong recommendations

- Maintaining greenspace and trees that absorb CO₂ are important in meeting the city's CAP goals. Tree replacement in this plan is inadequate. 17 trees will be removed within the development site, with no replacements proposed. No street trees along Mechanic street are proposed (4 required). No street trees are provided on E 3rd street.
 - Add trees in the lawn proposed at the northeast corner of the property.

- Given the extent of tree removal, a green roof, including containers supporting small trees, is mandatory. A green roof would contribute to lessening the heat island effect, help lower the temperature inside the building and aid stormwater management. An example is pictured below.
- If feasible, keep sycamore trees along Third St.
- For the trees planted along Polk St., include grates below sidewalk grade to allow water penetration while protecting tree roots. Consult City Forester for trees appropriate for the size of the planting box.
- It is expected that the developer will need to pay the fee for each tree not replaced per city ordinance.
- Increase setback on Polk St to 10 ft to incorporate more landscaping. Less impervious surface will benefit storm water absorption.
- Rather than a green lawn surrounding the building, consideration could be given to using native plants/grasses that will retain soil, provide pollinator habitat and do not need to be mowed. This low maintenance measure would provide a savings on landscape services and reduce greenhouse gas emissions from mowing.
- Consider LEED guidelines in the building structure. Adopting LEED guidelines will lower utility costs, provide healthier air, and yield higher asset value.
- We 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 like Heat Pumps, increased insulation and water conservation and indoor air quality measures.
- If an abundance of windows is planned, we note the potential for bird impacts. Birds are not capable of seeing glass, which is either clear (see-through) or reflective. When windows in a building line-up with one another, birds often see habitat on the far side and try to fly through to it, often hitting with a terrible and fatal force. According to Dr. Daniel Klem Jr., “Every year up to one billion birds are killed or fatally injured colliding with glass windows in North America alone.”

Should the building incorporate large areas of glass, we suggest that the design, location and lighting of the building be evaluated for potential collision risk. It is possible to purchase glass made specifically to reduce bird flight impacts and bird kills, known as bird friendly glass. Please let us know if you would like more information.

Additional Considerations

- 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, water conservation and indoor air quality measure 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. The Sustainable Energy Fund (SEF) administers the C-PACE program for Northampton County and can provide

information on the program (www.theSEF.org). In addition, there are currently tax credits for new solar energy systems.

- The loading zone seems very restrictive. Maybe one or two cars can use the allocated space while sharing the driveway for both entrance and exit. Considering the potential for resident pickup/drop off, package delivery and moving vehicles, this does not seem adequate.
- Ensure pet waste stations are available at entrances of the apartment building. Particularly, along the East facing entrance. This entrance is the closest to the Greenway, a popular dog walking spot. Pet waste stations will help reduce unhealthy waste in the neighborhood.
- Consider a health service or social service for first commercial tenants on Mechanic St. Mechanic St is home to Victory House, a veteran's community and home to the future Southside community center. A tenant that helps support the community, and is in a walkable location accessible to many, will be a welcome addition to Mechanic St.

Green roof example:



Thank you for your consideration.

Sincerely,

Steve Olshevski, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Megan Lysowski

Mandy Tolino

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds

