BETHLEHEM pennsylvania
environmental advisory council
www.bethlehemeac.com

July 20, 2026

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 large development centered on 701 N. New 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 applaud the inclusion of two indoor bicycle racks. Many people are choosing to forego a car and use alternatives, like bicycles. We think you tenants will value this.
- A dedicated loading/unloading parking space is included. This is often overlooked and a good addition to this plan.

Strong recommendations

- The developer is removing 5 mature trees, and has a deficit of 2 trees along Garrison St. This total of 7 trees should be installed by the developer at another location to be specified by the City Forester, or pay the $1000 per tree penalty.
- Regarding the planned trees:
    - The Yoshino Cherry tree is a bad choice. While it looks beautiful, it struggles with the harsh conditions found right next to a road. Yoshino cherry trees need plenty of room for their roots to spread out. The cramped soil spaces between sidewalks and streets will stunt their growth. They do not handle car exhaust, road salt, or city

dust very well. This stress makes them weak. These trees are prone to diseases like leaf spot and pests like aphids. When stressed by street conditions, they get sick much easier. Even in perfect conditions, they only live about 15 to 25 years. On a busy street, they may die even sooner.
    - The American Hornbeam (Carpinus caroliniana) is not a good choice. Its main drawbacks include a slow growth rate, difficulty in transplanting, and high sensitivity to environmental stressors like soil compaction, heat, and drought. Its thin bark also makes it highly vulnerable to damage. Hophornbeam is intolerant of salt so should be avoided where road salting is common.
    - Better choices are male Ginkos or Thornless Honeylocusts..
- More green space is required to reduce the heat island effect of this large concrete structure and help absorb CO2 from the air. Consider making a 'green' roof. There is already a deck planned for the roof. Instead of covering the roof with impervious surfaces, include a green roof capable of absorbing rain water and improving absorption of CO2. This could include a rooftop gardening space for tenants. Include a variety of potted plants and small trees. Consideration could be given to using native plants/grasses that will provide pollinator habitat in the planters on deck and courtyard.
- Consider planters alongside garage wall with trellis for vining plants such as native trumpet horn. Trellis plants can reduce the urban heat island effect.
- Unless a green roof is installed, this development will have impervious surfaces over the majority of the site. This will add a large volume of water going directly into the storm sewers. The city should be compensated for this increased demand on the storm sewer system. The existing compensation of 7 street trees does not seem adequate.
- The use of Electric Vehicles is increasing and Install Level 2 Electric Vehicle (EV) Charging stations to allow for a minimum of 4 cars to charge simultaneously. As gas prices surge, EV technology becomes less expensive, and lower cost used EV's come to market, EV's will become more popular. Offering on-site charging stations will increase the attractiveness for tenants while helping us reduce greenhouse gas emissions from tailpipes.
- Consider LEED guidelines in the building structures. 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.
- External lighting should not reflect up to avoid distracting migrating birds.
- 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 measures 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.
- Ensure pet waste stations are available at entrances of the apartment building. Pet waste stations will help reduce unhealthy waste in the neighborhood.

Thank you for your consideration.

Sincerely,

Steve Olshevski, Chair

On behalf of the Bethlehem EAC:
Ben Felzer, Vice Chair
Ben Guthrie, Secretary
Vibhor Kumar
Megan Lysowski
Mandy Tolino
Katie Trembler

cc: Bethlehem City Council
Mayor J. William Reynolds