



10 East Church Street  
Bethlehem, Pa. 18018  
[www.bethlehemeac.org](http://www.bethlehemeac.org)

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

February 18, 2022

Dear Ms. Heller and Ms. Samuelson,

We appreciate the opportunity to comment on the proposed Westgate Mall Phase 3 development. 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. 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 to reduce infiltration. A green roof would contribute to lessening the heat island effect, lower the heat inside the building and aid in stormwater management.

Furthermore, we recommend that the developer include solar panels or at least construct the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date.

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.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend, Vice Chair

Ben Guthrie, Secretary

Ben Felzer

Mike Topping

cc: Bethlehem City Council

Mayor J. William Reynolds