



CITY OF BETHLEHEM

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

BUREAU OF PLANNING AND ZONING

Phone: 610-865-7088

Fax: 610-865-7330

TDD: 610-865-7086

October 7, 2025

Barbara Dietsch

RE: **(25-008 Sketch Plan Review) – 25080002 – 740 WILLIAM STREET – SKETCH PLAN REVIEW – Ward 16, Zoned RR, Survey Plan dated May 31, 2024, Concept Plan dated January 15, 2025.**

Dear Ms. Dietsch,

The above-referenced plan has been reviewed by the appropriate City offices. A Sketch Plan lacks much of the information necessary for a thorough evaluation and has been reviewed only for general conformance to City of Bethlehem standards to the extent permitted by the limited detail provided. Additional comments will be provided when a more detailed plan is submitted for review.

At this point we offer the following sketch plan comments:

1. Zoning Relief. The applicants shall submit an Appeal Application to the Zoning Hearing Board (ZHB) for the following relief:
 - a. A Use Variance to permit single-family, semi-detached dwellings (aka twins or duplexes), where only single-family detached dwellings are permitted within the Rural Residential Zoning District.
 - b. A Variance to reduce the minimum lot size, where slopes exceed 35%; ten acres required, 1.347 acres existing.
 - c. A Variance to increase the maximum impervious coverage, where slopes exceed 35%, 5% permitted, 16.4% proposed.
 - d. A Dimensional Variance to exceed the maximum height of retaining walls used to cope with natural steep slopes, 5' maximum vertical drop permitted, various heights proposed, with the most significant ~12'.
 - e. A Dimensional Variance to reduce the minimum front yard setback, 25' required, various distances proposed, with the most significant at 4.9'.
2. In the Site Design Requirements, the consultant includes a column for the RT District; however, it is the Planning Bureau's position that this column should reference, "Other Allowed Uses," or the applicants may seek an interpretation from the ZHB.
3. Provide architectural elevations and indicate building height and label exterior finishes (This item shall be submitted in paper and e-format prior to the Planning Commission Meeting).
4. The existing cartway width of William Street nearby the proposed development is ~15'. The applicant shall consult with the City's Bureau of Engineering on the appropriateness of widening the street in this location. If the City requires widening of the street, then this shall be at the sole expense of the developer and included in the developer's agreement. See also Miscellaneous Engineering Comment #4.

Per the recently adopted Subdivision and Land Development Ordinance, Section 1344.03(C), It is recommended that the following matters be emphasized in a review of a sketch plan:

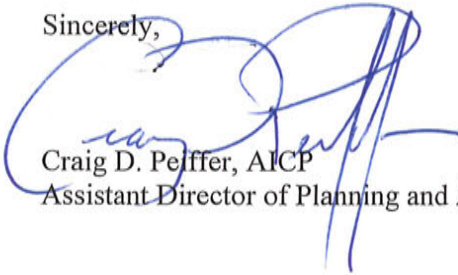
1. The suitability of areas proposed for development and areas proposed as open space.
2. The most suitable methods of providing street access, including access points onto existing streets, and possible interconnections with existing streets or streets within approved developments.
3. Methods to reduce the total percentage of the site that will be re-graded, paved or de-forested.

4. Compliance with the goals and objectives of the Comprehensive Plan, the Climate Action Plan, and other recent long-range City plans.

Additional comments to be addressed at the Land Development Plan review stage are attached.

This plan will be placed on the October 9, 2025, Planning Commission Agenda. Please let us know who will be attending in person. As a sketch plan submission, no formal action is required from the Planning Commission, but since this plan qualifies for Site Plan review, Ref. 1322.02(a)(1), then they may make recommendations to the Zoning Hearing Board, as applicable, regarding the plan.

Sincerely,



Craig D. Peiffer, AICP
Assistant Director of Planning and Zoning

C.	Basel Yandem	Craig Baer	Robert Taylor	Brian Spray
	Adam Herbold	Ryan Knause	Greg Cryder	John Lee
	Cathy Fletcher	Olivia Teel	Mike Halbfoerster	
	David Taylor			

Enclosures

Additional Comments Related to the Overall Land Development

PUBLIC WORKS

Stormwater Engineering

1. A stormwater system capable of managing the proposed 9,600 SF increase in impervious coverage shall be designed and included with the full plan submission.
2. Existing and proposed impervious coverage areas shall be shown. A stormwater fee of \$0.10 per SF may be charged for increase in impervious area pursuant to Article 925 of the City codified ordinance.

Sanitary Engineering

1. Plans must propose a method of managing the discharge of sanitary sewage from this development. A public sewer utility is not available along William Street along the frontage of the property. Developer shall either propose a design for on-lot sewer management or a public sewer main extension from the nearest facility at the intersection of 8th Street and William Street.
2. Proposals & designs of on-lot sewer are subject to the review of the City Sewage Enforcement Officer (SEO).
3. If a main extension is proposed, per ordinance No. 4342, at the time of a request for a building permit, a sanitary sewer tapping fee of \$2,527 per EDU will need to be paid. The total amount will be determined when a sanitary sewer facilities planning module application is submitted. A cover letter, describing the project, and a utility plan shall be included in the planning module submittal. Please note that building permits cannot be issued until the Planning Module is reviewed and approved by the Pennsylvania Department of Environmental Protection. The developer will be required to make formal arrangements to transfer ownership of & responsibility for the constructed facility to the City of Bethlehem.

Miscellaneous Engineering

1. Existing and proposed features, including, but not limited to, utilities and trees, shall be shown on separate plans.
2. Designs for the proposed retaining walls shall be included with a future full plan submission.
3. Existing and proposed lot monuments/iron pins shall be shown.
4. Sidewalk & curbing shall be installed along the entire property frontage per Article 909 of the City's Codified Ordinance. City standard curb and sidewalk details shall be included in the plan set.
5. The plans shall be updated with the following items:
 - a. Provide slopes and sight triangles on plans for driveways.
 - b. Include dimensions for the right-of-way width and cartway width.
 - c. Indicate the material to be used on all utility lines.
6. Each residential unit must be given a unique street address. The City suggests the following street numbers ascending from northwest to southeast. 740-742, 746-748, 752-754, 758-760 William St. these shall be added to the plan.
7. A 10' drainage and utility easement is required along the sides and rear of the property. The following note shall be added to the plans:
 - a. The drainage easement provides for the flow of storm water across lots, and may not be altered without the written permission of the City Engineer. No obstructions such as planting berms or fences may be installed in the drainage easements areas without sufficient provision for the passage of storm water, and any such proposed provision shall be approved in writing by the City Engineer.
8. The following notes are required on the land development plans:
 - a. By submission of these plans the engineer on record certifies that these plans are in complete conformance with the City of Bethlehem Storm Water Management Ordinance.
 - b. In order to maintain continuity between plan revisions, any changes to a previous plan submission shall be flagged with a triangle. Any changes not flagged may be considered not approved. Flagged changes shall be referenced to the appropriate revision date in the revision block.
 - c. Accurate as-built plans shall be kept up to date during the construction process. At the completion of the project record drawings shall be developed from the as-built plans and submitted to the City Engineer's Office. All final drawings shall show North American Datum (NAD) 1983 State Plane Coordinates in feet (Pennsylvania South, FIPS Zone 3702) and the digital file shall be in State Plane Feet Coordinates as applicable. The hard copy of the record drawings shall be in the form of a Mylar copy. The engineer of record shall certify (i.e. P.E. stamped and signed) that the record drawings comply substantially with the approved plan and that they conform to industry standards. All digital files shall reside on PC compatible USB drive containing the digital representation of the final plan as presented on the twenty-four (24) inch

by thirty-six (36) inch sheets. The digital map shall be AutoCAD compatible. All layers included in the digital maps shall be the standardized layers prepared and utilized by the City of Bethlehem to ensure compatibility with the City's existing CAD standards and as described in Appendix A of the City's Subdivision and Land Development Ordinance.

- d. Prior to any work within the Right-of-Way, permits shall be obtained from the City Engineering Office.

Electrical

1. An additional streetlight matching the streetlight mounted on the PPL Pole 66595 s47332 will need to be installed at the contractors cost onto PPL Pole 66578 s47352. The contractor shall work with PPL to get permission for the new light and once it is installed and operational it will be turned over to the city, and the city will sign off on financial responsibility at that time. The streetlight is a Phillips Streetview 49-watt LED type 2 distribution fixture with a 3-pin twist lock photocell socket.

Traffic

1. Trip generation calculations shall be submitted for the plan, so that it can be determined if a traffic study is required per the City's Subdivision and Land Development Ordinance, Section 1347.14.

Forestry

1. Submit a landscape plan with requirement calculations.

Water

1. Additional comments may be provided under separate cover.

FIRE

The City of Bethlehem Fire Department currently enforces the 2018 Edition of the International Fire Code in its entirety including Appendices, with local amendments, as adopted in Article 1501 of the Codified Ordinances of the City of Bethlehem, Ordinance 2022-15.

A condensed version of Article 1501/Ordinance 2022-15 listing the common items that affect Land Development Projects is attached at the end of this document for reference. For a copy of the full ordinance please visit <https://www.bethlehem-pa.gov/CityOfBethlehem/media/BFDMedia/Fire-Code.pdf>

1. Indicate if the buildings are to be sprinklered? If the buildings are to be sprinklered, then indicate the proposed location of all Fire Department Connections (FDC). Fire department connections shall be located on the street side of buildings, fully visible and recognizable from the street or nearest point of fire department vehicle access or as otherwise *approved* by the Fire Marshal. Add a note to the plan stating, "Any change in the location of the Fire Department Connection must be approved by the City of Bethlehem Fire Department."
2. Indicate the proposed building height. Provide overall building height, height to the highest roof surface (for purposes of this section, the highest roof surface shall be determined by measurement to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater), and the height from finished grade to finished floor level for the highest floor.
 - a. All buildings less than 30 feet in height must have 20 foot wide, minimum, access road(s).
 - b. All buildings 30 feet or greater in height must have 26 foot wide, minimum, access road(s) and must accommodate a fire apparatus weighing 84,000lbs. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information). At least one of the required access roads meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information).
3. Add a note to the plan acknowledging that Chapter 33 of the IFC "Fire Safety During Construction and Demolition" will be enforced for the duration of the construction project.
4. The following drawings are required to be submitted for Fire Department Review of Land Development Plans:
 - a. Utility Plan, including water supply showing fire hydrants on or near property.
 - b. Turning Plan.
 - c. Site Plan.
 - d. Grading Plan.
 - e. Elevation Plan or other documentation indicating proposed building height.

Contact the City of Bethlehem Fire Department office at: 610-865-7143, and request Fire Marshal Craig Baer, cbaer@bethlehem-pa.gov, with any questions or to obtain any documents required to complete the submittal for review.

ZONING

1. Proposal appears to be completely contrary to the stated goals of the RR (Rural Residential) Zoning District [ZO §1303.07(a)] and Article 1316, Steep Slopes [ZO § 1316.01(a)] and will likely require additional variances to those listed on plan.
2. Zoning Information table and Plan Intent statement both state the proposal is to construct 6 Twins (Single Family Semi-Detached Dwelling); however, the statement partially listing some Zoning Hearing Board relief required mentions 'Townhouses'.
3. Revise plan to include a table specifying inventory and ratio calculations for all areas of existing, disturbed and proposed areas of steep slopes. [Article 1316]
4. Map and inventory all healthy trees "over 6 inches in trunk width measured at 4.5' DBH (diameter at breast height)" and areas of "heavy brush growth are to be removed or preserved as a result of the development". [1316.01(f)(3)]
5. Proposed rear yard retaining walls appear to exceed 5' height in some areas. [1316.01(e)]
6. While not specifically a 'Zoning' issue, it is unclear the grading of the rear yard areas adjacent to the proposed dwellings will meet building code requirements. As this has the potential to affect implementation of zoning requirements at the construction stage, this is an issue the applicant's design professionals may want to review with a building designer.
7. Delineate (and measure) areas proposed to be preserved in accord with ZO §1316.01(g).
8. Specify proposed slope of all side yard areas demonstrating compliance with ZO § 1316.01(i).

GENERAL

1. A Recreation Fee of \$9,000.00 shall be paid at the time of execution of the developer's agreement.
2. Provide pedestrian access from the required sidewalk on the right-of-way to the front doors of each dwelling.
3. Denote the type of vegetative ground cover proposed for non-paved or built areas. The use of hardscape, such as gravel or rock, should only be used where it is deemed to be necessary to control stormwater, and only then to the extent necessary. Grade shall be sloped away from the building footprint to permit required foundation plantings.
4. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
5. The Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
6. The project should generally comply with the goals and objectives of the City's Climate Action Plan for new development, including energy efficient construction, provisions for safe walking and biking, green development and other various provisions.



CITY OF BETHLEHEM

Department of Fire
Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV

BILL NO. 15-2022

ORDINANCE NO. 2022-15

AN ORDINANCE OF THE CITY OF BETHLEHEM,
COUNTIES OF LEHIGH AND NORTHAMPTON,
COMMONWEALTH OF PENNSYLVANIA, AMENDING
ARTICLE 1501 OF THE CODIFIED ORDINANCES OF
THE CITY OF BETHLEHEM TITLED
FIRE SAFETY AND CODE ENFORCEMENT INSPECTION FEES

THE COUNCIL OF THE CITY OF BETHLEHEM HEREBY ORDAINS AS FOLLOWS:

SECTION 1. That Article 1501 of the Codified Ordinances of the City of Bethlehem, titled "Fire Safety and Code Enforcement Inspection Fees" as presently enacted is hereby restated and re-enacted as follows:

ARTICLE 1501

FIRE SAFETY AND CODE ENFORCEMENT INSPECTION FEES

- 1501.01 Authority
- 1501.02 Permits Required
- 1501.03 Inspection
- 1501.04 Adoption
- 1501.05 Modifications to 2018 International Fire Code

CROSS-REFERENCES

2018 International Fire Code - International Code Council
Article 150 of the Codified Ordinances of the City of Bethlehem - Codes Board of Appeals
Article 746 of the Codified Ordinances of the City of Bethlehem - Consumer Fireworks
DOT 49 CFR Parts 100-185 - United States Department of Transportation regulations
Optional Third Class City Charter Law Act of July 15, 1957, P.L. 901, as amended
Pennsylvania Uniform Construction Code 34 Pa.Code § 403

1501.01 AUTHORITY.

The City of Bethlehem Fire Department, Bureau of Inspections is hereby charged with the enforcement of this Article.

1501.02 PERMITS REQUIRED.

Bethlehem Fire Department



CITY OF BETHLEHEM

Department of Fire
Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV

Permits required by the International Fire Code (current edition) shall be obtained from the Fire Code Official. Issued permits shall be kept on the premises designated therein at all times and shall be readily available for inspection by the Fire Code Official.

A fee for each permit shall be paid in accordance with the fee schedule as is set forth by resolution of Council of the City of Bethlehem, Pennsylvania.

1501.04 ADOPTION

The 2018 International Fire Code (hereafter "IFC") published by the International Code Council, which is part of the Pennsylvania Uniform Construction Code pursuant to 34 Pa.Code § 403.21(a)(8), is hereby adopted in its entirety and made part of this Article subject to the modifications implemented hereinafter and/or by subsequent ordinance(s) of the City of Bethlehem (~~strikeouts~~ identify proposed deletions and underlined text identify proposed insertions to the 2018 IFC).

101.1 Title These regulations shall be known as the *FIRE CODE* of The City of Bethlehem, hereinafter referred to as "this code".

101.2.1 Appendices B, C, D, E, F, H, I, L, are adopted as part of this code.

1501.05 MODIFICATIONS TO 2018 INTERNATIONAL FIRE CODE.

(b) § 105.6.15 of the IFC shall be amended to read as follows:

105.6.15 Fire hydrants and valves. Approval from the Bethlehem Water Authority or its designee is required to use or operate fire hydrants or valves intended for fire suppression purposes which are installed on water systems and accessible to a fire apparatus access road that is open to or generally used by the public.

Exception: A permit is not required for authorized employees of the Bethlehem Water Authority or its designee that supplies the system or the fire department to use or operate fire hydrants or valves.

(d) § 105.6.39 of the IFC shall be amended to read as follows:

105.6.39 Private fire hydrants. Approval from the Bethlehem Water Authority and the Fire Code Official is required for the removal from service of private fire hydrants.

Exception: Approval from the Bethlehem Water Authority and the Fire Code Official is not required for private industry with trained maintenance personnel, private fire brigade or fire departments to maintain, test and use private hydrants.

Bethlehem Fire Department



CITY OF BETHLEHEM

Department of Fire
Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV

(g) § 105.7.19 of the IFC shall be amended to read as follows:

105.7.19 Private Fire Hydrants. A construction permit is required for the removal or modification of private fire hydrants. Maintenance performed in accordance with this code is not considered to be a modification and does not require a permit.

(k) § 109.1 of the IFC shall be amended to read as follows:

109.1 Board of appeals established. In order to hear and decide appeals of orders, decisions or determinations made by the fire code official relative to the application and interpretation of this code, the Board of Appeal identified in Article 150 of the Codified Ordinances of the City of Bethlehem and/or occasionally known as the "Codes Board of Appeals" shall have exclusive jurisdiction, subject to any right of further appeal therefrom.

(m) The definition of the term "approved" found in IFC § 202 relating to General Definitions shall be amended to read as follows:

Approved. Acceptable to the fire code official, as evidenced by his/her written approval.

(o) The definition of the term "fire code official" found in IFC § 202 relating to General Definitions shall be amended to read as follows:

FIRE CODE OFFICIAL. The fire chief or other designated authority, including the Fire Marshal of the City of Bethlehem, charged with the administration and enforcement of the code, or a duly authorized representative. The terms "Fire Marshal of the City of Bethlehem" and "Fire Code Official" shall be interchangeable in this and any other ordinance or resolution of the City of Bethlehem.

(z) Add the following subsection to the IFC:

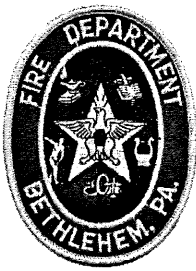
505.1.1 Only addresses approved and verified by the Department of Public Works Bureau of Engineering will be acceptable.

(aa) § 507.3 of the IFC shall be amended to read as follows:

507.3 Fire flow. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method determined by Department of Water and Sewer Resources.

507.3.1 Fire flow testing. The fire code official, Department of Water and Sewer Resources or its designees shall be notified prior to conducting fire flow testing. Fire flow tests shall be witnessed by the fire code official, Department of Water and Sewer Resources or its designees and approved documentation of the test and results shall be provided to the Department of Water and Sewer Resources.

Bethlehem Fire Department



CITY OF BETHLEHEM

Department of Fire
Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV

(bb) §507.4 of the IFC shall be amended to read as follows:

507.4 Water supply test. The fire code official and Department of Water and Sewer Resources or its designees shall be notified prior to the water supply test. Water supply tests shall be witnessed by the fire code official and Department of Water and Sewer Resources or its designees or approved documentation of the test shall be provided to Department of Water and Sewer Resources prior to final approval of the water supply system.

507.4.1 The property owner is responsible for installation and maintenance of water supply for construction projects until the water system is accepted/approved by the Department of Water and Sewer Resources, and responsibility for the system is formally turned over to the Department of Water and Sewer Resources.

(cc) § 507.5.1 of the IFC shall be amended to read as follows:

507.5.1 Where required. Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 400 feet (122 m) from a hydrant on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official and the Department of Water and Sewer Resources

Exceptions:

1. For Group R-3 and Group U occupancies, the distance requirement shall not be greater than 500 feet (152.4 m).

2. For buildings equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2, the distance requirement shall not be greater than 500 feet (152.4 m).

(dd) Insert 901.6.3.2, 901.6.3.2.1, 901.6.3.2.2

901.6.3 Records. Records of all system inspections, tests and maintenance required by the referenced standards shall be maintained on the premises for a minimum of three years and shall be provided by the company performing the inspection(s) to the Office of the Fire Marshal, unless an alternate designee is specified by Resolution approved by the City Council of the City of Bethlehem.

Insert 901.6.3.2.1 Records shall be provided per City of Bethlehem Resolutions 2018-214 and 2018-222

Insert 901.6.3.2.2 Records shall be provided within 30 days of the date of inspection, testing, or maintenance

Bethlehem Fire Department



CITY OF BETHLEHEM

Department of Fire
Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV

(ee) § 903.4.2 of the IFC is deleted in its entirety and replaced with the following:

903.4.2 Alarms. Approved audible devices shall be connected to every automatic sprinkler system. Such sprinkler waterflow alarm devices shall be activated by waterflow equivalent to the flow of a single sprinkler of the smallest orifice size installed in the system. Alarm devices shall be provided on the exterior of the building in an approved location. Where a fire alarm system is installed, actuation of the automatic sprinkler system shall actuate the building fire alarm system. In automatic sprinkler systems where multiple sprinkler risers are required, and the risers are located in separate areas within the building, an outside visible alarm notification appliance shall be required for each riser. Such appliance shall be a white strobe (minimum 95 candela strobe rating) placed in an approved location on the exterior wall, as close as practicable, to each sprinkler riser. The strobe will activate when the water flow alarm for its respective riser is activated.

(ff) The following subsection is added:

905.3.9. Large Area Buildings: The City requires Class I standpipes to access any portion of a building's interior which is more than 250 feet from the nearest approved point of fire department access or the nearest Class I standpipe connection. This distance shall be measured along a path of travel where fire hose can be deployed for fire suppression activities.

(gg) 905.4.1 Shall be modified to read:

905.4.1 In every required interior exit stairway, a hose connection shall be provided for each story above and below grade plane. Hose connections shall be located at an intermediate landing between stories, when present, unless otherwise approved by the fire code official

(hh) § 906.1 of the IFC shall be amended to read as follows:

906.1 Where required, portable fire extinguishers shall be installed in the following locations.

1. In new and existing Group A, B, E, F, H, I, M, R-1, R-2, R-4 and S occupancies without exception.



CITY OF BETHLEHEM

Department of Fire

Office of the Fire Marshal

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

www.bethlehem-pa.gov/fire

Phone: 610 865-7140

Fax: 610 997-5746

TDD: 610 865-7143

FIREPREVENTION@BETHLEHEM-PA.GOV