



# CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

Phone: 610-865-7088

Fax: 610-865-7330

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November 7, 2025

Macada Partners, 539 Brighton  
[REDACTED]

RE: **(25-011 Sketch Plan Review) – 25100006 – 539 BRIGHTON STREET – SKETCH PLAN REVIEW – Ward 1, Zoned RG, plans dated August 28, 2025.**

Dear Mr. Ronca,

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:

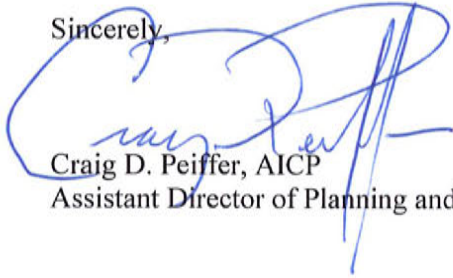
1. Zoning Relief. The Applicant shall submit an Appeal Application for the following relief:
  - a. The Applicant proposes to construct six (6) Single-Family Attached Dwellings (aka townhouses or rowhouses). In the RG District, Single-Family Attached Dwellings are limited to a maximum of (4) four dwelling units in any row or grouping. Ref. 1306.01(a)(3), footnote (c). See also Zoning Comment 1.
  - b. Without the benefit of a topographic plan, the Planning and Zoning Bureau were unable to make a determination if the lowest level is deemed to be a Basement or a Story; Ref. 1302.11, 1302.129. If finished grading is such that at least one third of the exterior perimeter walls are five (5) feet or more above the finished grade, then Applicant shall seek zoning relief. Ref 1306.01(a)(3), which limits building height to 2-1/2 stories.
2. Provide architectural elevations or a rendered perspective and label exterior finishes (this item shall be submitted in paper or e-format prior to the Planning Commission Meeting).
3. The façade fronting Brighton Street should have more of an appearance of a front façade. This may be achieved by adding a vertical masonry element between the windows and terminating with a shed roof at the bottom of the gable roof (ledger board); extending the porch and roof to wrap the corner; or orient the front door to this facade.
4. If the Applicant decides to break the dwellings into a set of two and a set of four structures, then it is recommended that the two-unit structure be oriented toward Brighton Street.

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

Over

**This plan will be placed on November 13, 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. 1322.03(zz)(6), then they may make recommendations to the Zoning Hearing Board, as applicable, regarding the plan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Craig D. Peiffer', is written over the word 'Sincerely,' and extends down into the printed name and title.

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

C.	Basel Yandem	Craig Baer	Robert Taylor
	Geoffrey Karnanja	Ryan Knause	Greg Cryder
	Cathy Fletcher	Olivia Teel	Mike Halbfoerster
	David Taylor		

Enclosures

## **Additional Comments Related to the Overall Land Development**

### **PUBLIC WORKS**

#### **Stormwater Engineering**

1. A stormwater fee may be charged for increase in impervious area.

#### **Sanitary Engineering**

1. In accordance with Ordinance No. 4342, at the time of execution of the developer's agreement, 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.

#### **Miscellaneous Engineering**

1. Existing and proposed features, including, but not limited to, utilities, profiles, landscaping, lighting and details shall be shown on separate plans.
2. The following notes are required on the land development plans:
  - a. 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.
  - b. 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 USB flash 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.
3. Prior to any work within the Right-of-way, permits must be obtained from City Engineering office.

#### **Electrical**

1. Comments, if any, will be sent separately.

#### **Traffic**

1. Submit trip generation calculations for the plan, so that it can be determined if a traffic study is required per the SALDO, Section 1349.04(M)(3)(a).

#### **Forestry**

1. Submit a landscape plan with requirement calculations. Landscaping shall include, but is not limited to, replacement trees, street trees, and trees for the increase in impervious surface, and as applicable, parking lot trees, buffer plantings and foundation plantings.
  - a. Replacement trees include any healthy tree removed as part of the development that has a trunk diameter of 8 inches or greater measured 4.5 feet above the ground level.

### **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. *Approved* fire apparatus access roads shall extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior. 2018 IFC 503.1.
2. The architect/engineer must confirm Fire Department vehicles have the required turning space to access all areas. (Please contact us for turning radius information for our vehicles) Submit a turning plan drawing.
3. Indicate if the building is planned to be sprinklered? If the building is to be sprinklered please 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. Please add 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."
4. All 'Fire Lanes' or "Fire Department Access Roads" must be identified and properly marked. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information. Locations for signs and markings can be determined as the project progresses.)
5. Indicate the proposed building height. Provide overall building height, height from grade plane 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 the lowest level of fire department vehicle access to finished floor level for the of 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.)
6. The architect/engineer must confirm Fire Department apparatus will be able to drive on all road surfaces without contacting the driving surface. Check angles of approach and departure to confirm the front or rear apparatus bumpers will not contact the driving surface. Also confirm the middle of the truck will not contact the driving surface of humps or crowns such as on speed bumps. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information. Contact us for detailed vehicle information.)
7. Add note to plan to acknowledge that Chapter 33 of the IFC "Fire Safety During Construction and Demolition" will be enforced for the duration of the construction project.
8. The following drawings are required to be submitted for Fire Department Review of Land Development Plans:
  - a. Utility plan to include 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)
9. Additional drawings may be required based on the individual project.

Please contact the City of Bethlehem Fire Department office at 610-865-7143 and request Fire Marshal Craig Baer ([cbaer@bethlehem-pa.gov](mailto:cbaer@bethlehem-pa.gov)) or Chief Fire Inspector Lucas Fuller ([lfuller@bethlehem-pa.gov](mailto:lfuller@bethlehem-pa.gov)) with any questions, referenced Fire Code requirements or to obtain any documents required to complete the submittal for review.

## **RECYCLING**

1. The plans do not provide any details on how the property owner will maintain trash and recycling services for the apartment units. Provide specific details such as location of where trash and recycling materials will be stored and/or collected, the type of container(s), the number of containers and the frequency of service for both trash and recycling materials.

## **ZONING**

1. If the grouping of six Single Family Attached Dwellings are broken up, developer should be mindful of the requirement: "*Where a condominium arrangement is approved, the applicant shall prove that the buildings will be spaced so that the dimensional requirements would have been met if the dwellings were on individual non-condominium lots*" [ZO §1306.01(a), footnote (c), fourth bullet]. Proper notes restricting selling the lots off as individual condominiums should be added to the eventual Record Plan signature sheet, or proper spacing should

be provided.

2. Design engineer should inventory and identify all areas of 'Steep Slopes' occurring on the subject lot or certify via plan note that there are no areas on the subject lot regulated by Zoning Ordinance Article 1316.
3. Provide lighting and landscaping plans.
4. Indicate on the plan the location for bicycle parking.
5. If a dumpster or totes are to be stored outside, then indicate on the plan the location and provide enclosure details.

#### **GENERAL**

1. A Recreation Fee of \$9,000 shall be paid at the time of execution of the developer's agreement.
2. Provide pedestrian access from Brighton Street to the entrance of each dwelling and to bicycle parking.
3. Applicant is encouraged to consider green options to promote stormwater infiltration and filtering of pollutants, including:
  - a. Suitable alternative surfaces such as porous pavement and pervious pavers.
  - b. Rain gardens or bioswales with plantings that are water tolerant, native species and promote pollinators.
  - c. Direct stormwater from roof downspouts into suitable vegetative areas.
4. 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 recommended foundation plantings.
5. Add a note to the plan, "All landscaping, as approved on final site plans, shall be completed and maintained, including the replacement of dead plantings by the applicant or his successors and assigns.
6. Add a note to the plan indicating that the parcel is neither located within the floodway nor any special flood hazard area; Ref. FEMA FIRM 42095C0307E, effective on 7/16/2014.
7. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
8. The Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
9. 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.







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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**



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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.

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(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.

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(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

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(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.





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