



# 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

December 4, 2025

Kevin J. Horvath, P.E.  
Keystone Consulting Engineers, Inc.  
[Redacted]

**RE: (25-006 LD) – up – 46-52 WEST BROAD STREET – LAND DEVELOPMENT PLAN – Ward 7,  
Zoned CB, plans dated August 18, 2025, last revised November 7, 2025.**

Dear Mr. Horvath,

The above-referenced plan has been reviewed by the appropriate City offices. We offer the following comments:

## **PUBLIC WORKS**

### **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 \$152,429.00 shall be paid. This amount was determined based upon the submitted sanitary sewer facilities planning module (SFPM) application.
2. The submitted SFPM application has been received and is under review. Please note that building permits cannot be issued until the Planning Module is reviewed and approved by the Pennsylvania Department of Environmental Protection (PaDEP).

### **Miscellaneous Engineering**

1. Engineering review has been approved, contingent upon the following items being addressed on the final plan set:
  - a. The City standard driveway apron detail shall be added to sheet LD5 of 5.
  - b. The existing sanitary sewer lateral shall be capped at the main. Display its location on the plan and include a note to this effect.
  - c. The Engineering Bureau is amenable to the request to allow a longer than standard depressed curb along West Raspberry Street for the purpose of trash collection and loading dock access.

### **Forestry**

1. Update the planting detail on Sheet LD4 of 5 to include the City of Bethlehem Planting detail. Contact the City Forester, Olivia Teel, for the current detail at: [oteel@bethlehem-pa.gov](mailto:oteel@bethlehem-pa.gov).
2. If the calculated amount of street trees cannot be planted, then a fee of \$500 per tree ( $3 \times \$500 = \$1,500$ ) shall be paid at the time of execution of the developer's agreement.

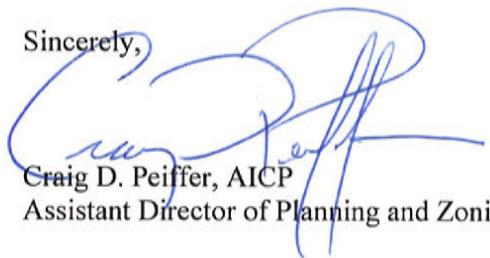
### **GENERAL**

1. A recreation fee of \$94,537.50 shall be paid at the time of execution of the developer's agreement ( $6,150^* \text{ SF} \times 0.25\text{¢} = \$1,537.50 + \$1,500 = \$3,037.50$ , and  $61 \text{ DUs} \times \$1,500 = \$91,500$ ) \*If this is to be a three-story structure, as shown on the elevation drawing, then this number will increase by the additional square footage). Note: The renderings received via email on November 24, 2025, show this building as a three-story structure; whereas the floor plans indicate two floors of inhabitable space. The Applicant shall clarify if the first floor is two stories in volume, or if the intent is for a three-story structure. The email correspondence and attachment are included with this letter. These are also referenced in General Comment 5(a).

2. Site Landscaping, per SALDO 1349.08(f)(2)-previous SALDO, provide for “a minimum of ten (10%) percent of the area represented by approved plantings in addition to front and side foundation shrubs and any buffer planting which may be necessary to screen garbage collection or parking areas.”
  - a. The Applicant has requested a waiver from this Section. However, per SALDO 1349.19(D)(9)-current SALDO, “the use of architectural planters is permitted in fulfillment of landscaping requirements. These planters shall be of material and design specifically intended for landscaping use.”
  - b. The Planning Bureau does not support a full waiver of landscaping requirements and directs the Applicant to use the aforementioned section to meet the landscaping requirements. If ten percent (10%) is deemed to be infeasible, then the Applicant may seek a reduction in landscaping requirements from the Planning Commission.
3. Comments from the Environmental Advisory Council were provided to the Applicant on November 18, 2025; the letter is also attached hereto. The Applicant shall provide responses to the letter when revised plans are submitted.
4. The Lehigh and Northampton Transit Authority (LANTA) provided the following comment:
  - a. The Bethlehem Transportation Center (BTC), one of LANTA’s largest transit centers, is located directly across Guetter Street from the west side of the project, between West Broad Street and North Street. There is currently a midblock crosswalk at Guetter Street and Raspberry Street. LANTA recommends upgrading the crosswalk and curb ramp with a new detectable warning surface for a formally Public Right-of-Way Accessibility Guidelines (PROWAG) compliant crosswalk at the southern corner of the Raspberry Street and Guetter Street intersection. This will provide full accessibility from the project site to the transit center.
5. Building elevations, although not annotated, appear to show the use of brick masonry. Referring to the Secretary of the Interior’s Standards for Rehabilitation, Rooftop Additions, it is suggested that the new construction above the bank building visually appears as light as possible, using either an all-glass façade of clear or low tint or the combination of glass and metal panels. It is further suggested that the addition be setback from the original façade along the full length of Guetter Street.
  - a. The Applicant has provided revised plans that address the Planning Bureau’s recommendations.
6. The architect should specify bird-friendly glass being UV-reflective, patterned glass, such as Arnold Glas, Ornilux Mikado or Pilkington AviSafe.
7. It is unclear from the south elevation if the intent is to replace the front façade including glass walls and decorative door surrounds. These character-defining features shall be maintained, or the applicant shall seek review from the Historic Conservation Commission (HCC).
  - a. The rendering still shows this as a replacement glass storefront; however, the Applicant has verbally stated that this wall is to remain as-is. The rendering shall be modified to reflect the preservation of this façade.
8. Submit an engineer’s opinion of probable cost estimate in MS Excel Format for review and use in preparing the Developer’s Agreement

**This plan will be placed on the December 11, 2025, Planning Commission Agenda.**

Sincerely,



Craig D. Peiffer, AICP

Assistant Director of Planning and Zoning

C.	Basel Yandem Adam Herbold Cathy Fletcher David Taylor	Craig Baer Olivia Teel Ryan Knause Robert Taylor	Greg Cryder Michael Halbforester	Rocco Ayvazov, 46-52 West Broad Street LLC
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Enclosures



November 3, 2025

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

Dear Ms. Fletcher and Mr. Peiffer,

The EAC appreciates the opportunity to comment on the proposed development at 46-52 West Broad 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. 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 water saving devices. A green roof would also contribute to lessening the heat island effect, which is of concern, especially as the climate continues to warm. Green roofs also help lower the heat inside the building and aid in stormwater management.

Furthermore, we strongly recommend that the developer assess the inclusion of solar panels. An evaluation of solar feasibility can be done at no cost by a solar energy service provider. If a solar energy system is feasible, the building can be constructed with adequate structural rooftop capacity and electrical rough-ins to support a system.

Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that provides long-term financing for renewable energy, energy efficiency, water conservation, indoor air quality and resiliency 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. These initiatives not only lower greenhouse gas emissions but also deliver long-term energy cost savings.

C-PACE has been expanded to include multi-family developments greater than five units and therefore this development should qualify. The Sustainable Energy Fund (SEF)

administers the C-PACE program for Northampton County and can provide information on the program ([www.theSEF.org](http://www.theSEF.org)).

The CAP recommends the inclusion of "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9). With the lack of onsite parking and the location of this property amidst the business district, we recommend ample bike parking for residents, visitors and customers. For your information, for a multifamily dwelling, the Association of Pedestrian and Bicycle Professionals (APBP) publishes the "Essentials of Bike Parking" ([https://www.apbp.org/assets/docs/EssentialsofBikeParking\\_FINA.pdf](https://www.apbp.org/assets/docs/EssentialsofBikeParking_FINA.pdf)), which provides guidance regarding bike rack selection for long-term and short-term parking.

Due to the height of the building and the abundance of large windows, 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."

Therefore, we recommend 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. The following links to brief educational videos, made in collaboration with Muhlenberg College, speak to this issue and how and how it can be addressed. Please let us know if you would like more information.

[Bird Safe Glass Explained: The Issue](#)  
[Bird Safe Glass Explained: Solutions](#)

In the spirit of sustainability, we suggest that construction waste and refuse be sent to a recovery company (e.g. Revolution Recovery in Allentown) to avoid going directly to a landfill.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Steve Olshevski

Mandy Tolino

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds