



# CITY OF BETHLEHEM

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

BUREAU OF PLANNING AND ZONING

Phone: 610-865-7088  
Fax: 610-865-7330  
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December 5, 2025

Tom Serpico, PE  
Pennoni Associates, Inc.



RE: **(25-012 Sketch Plan Review) – 25110001 – UNIVERSITY DRIVE known as 110 MOUNTAIN DRIVE SOUTH (LEHIGH UNIVERSITY-EAST HILL RESIDENCE HALLS) – SKETCH PLAN REVIEW – Ward 3, Zoned I, plans dated September 10, 2025.**

Dear Mr. Serpico,

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.

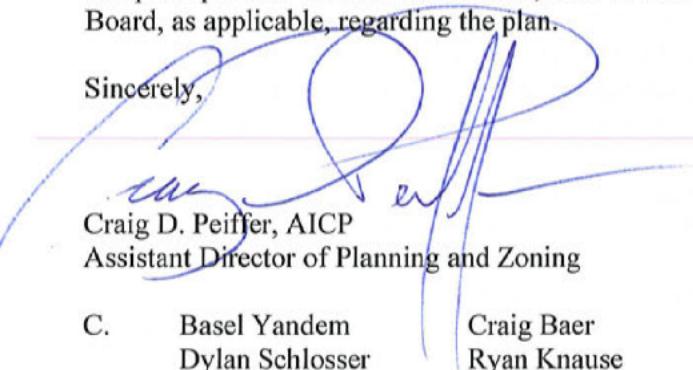
At this point we offer the following sketch plan comments:

1. Retaining walls should not exceed 5' in height, provide for terraced walls or a single vegetative crib wall.
2. Provide a rendered perspective with labeled exterior finishes (this item shall be submitted in paper or e-format prior to the Planning Commission Meeting).

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

**This plan will be placed on December 11, 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,



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

C. Basel Yandem  
Dylan Schlosser  
Cathy Fletcher  
David Taylor

Craig Baer  
Ryan Knause  
Olivia Teel

Robert Taylor  
Greg Cryder  
Mike Halbfoerster

Joe Klocek, Lehigh University

Enclosures

## Additional Comments Related to the Overall Land Development

### **PUBLIC WORKS**

#### **Stormwater Engineering**

1. A stormwater management report shall be submitted to the City and to the Lehigh Valley Planning Commission (LVPC). Provide a copy of the transmittal and review letter from LVPC.
2. The existing and proposed impervious coverage shall be shown in square feet.

#### **Miscellaneous Engineering**

1. An erosion & sedimentation control plan will be required and shall be reviewed by PaDEP. A copy of the NPDES permit shall be submitted to the City.
2. Provide details for the proposed ADA ramps for review.
3. 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.

### **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.
2. Include a chart of any existing trees over 8 inches in diameter that are to be removed.
3. Note that any trees that are to be removed or pruned within the public right of way will require a street tree permit and city-licensed arborist.

### **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. The architect/engineer must confirm Fire Department vehicles have the required turning space to access all areas. Contact us for turning radius information for our vehicles and submit turning plan drawings for University Drive and Dravo Drive.
2. 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 shall be approved by the City of Bethlehem Fire Department."
3. All Fire Lanes or Fire Department Access Roads shall be identified and properly marked (Refer to the 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).
  - a. Both University Drive and Dravo Drive are Fire Department Access Roads.
4. All buildings 30 feet or greater in height shall have 26-foot-wide minimum access road(s) and shall accommodate 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).
5. Indicate the proposed building height from the lowest level of fire department vehicle access to finished floor level for the of the highest floor.

6. The architect/engineer shall 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 a 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 the proposed structure.
  - b. Fire department apparatus turning plan.
  - c. Site plan.
  - d. Grading plan.
  - e. Elevation or other documentation indicating proposed building heights.

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.

## **ZONING**

1. Project requires one (1) parking space for every four (4) beds proposed; Ref. 1319.01(a)(10). Reference the University's Master Parking and Transportation Plan and provide a narrative that addresses parking requirements.
2. Delineate 'Construction Area' (Limits of Disturbance), and within that area define and provide numerical inventory of all features listed under Zoning Ordinance Section 1316.01(f).
3. Provide overall tree inventory and preservation plan complying with Zoning Ordinance Section 1318.28.
4. Eventual design must comply with Zoning Ordinance Section 1306.02(f) "In the Institutional Zone, height of buildings may equal the right-of-way of an adjacent street. Buildings may exceed this height if building is set back, in addition to the required setback, one (1) foot for each three (3) feet, or fraction thereof by which such building exceeds the width of the street."

## **GENERAL**

1. 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, consist of native species and promote pollinators.
  - c. Direct stormwater from roof downspouts into suitable vegetative areas or include green roofs.
2. Denote the type of vegetative ground cover proposed for non-paved or built areas. The ground cover shall be suitable for sloped areas, include native species and promote pollinators. 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.
3. 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.
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.





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## Land Development Review Submittal Sketch Plan-25110001-110 University Dr

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The following drawings are required to be submitted for Fire Department Review of Land Development Plans:

Utility plan to include water supply showing fire hydrants on or near property  
Turning Plan  
Site Plan  
Grading Plan  
Elevation Plan (or other documentation indicating proposed building height)

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 question reference Fire Code requirements or to obtain any documents required to complete the submittal for review.



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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.



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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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