



CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

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July 3, 2025

Philip Albright
Lehigh Engineering Associates, Inc.

RE: (25-003 Sketch Plan Review) – 25060003 – 241 EIGHTH AVENUE – SKETCH PLAN REVIEW – Ward 10, Zoned RT, plans dated June 9, 2025.

Dear Sir,

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 has submitted an Appeal Application, with a Zoning Hearing scheduled for Wednesday, July 23, 2025, for the following:
 - a. A dimensional variance for lot width, 90' required, 80' existing, and
 - b. A variance to reduce the width of the buffer yard adjacent to a single-family detached dwelling, 15' required, 10' proposed.
2. The existing structure is a detached ranch dwelling with a partially exposed basement along the south façade. Existing neighborhood context adjacent to the subject parcel includes a two-story single-family detached dwelling to the north and a two- and one-half story duplex to the south. Nearby neighborhood context includes two- and one-half story detached and duplex dwellings; a split-level detached dwelling and two story attached dwellings (row homes).
3. The existing topography for the site slopes predominantly from north to south, with a contour of 309 at the northeast corner and a contour of 294 at the southwest corner.
4. To minimize the visual impact of the proposed three-story structure with a gable roof and extensive retaining walls, the applicant should consider a stepped foundation, so that the southern half of the structure is one half story below the northern half of the structure. The applicant should also consider modifying the roof form to lower its height.

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

This plan will be placed on the July 10, 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(z)(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
David Taylor
Georffrey Karanja

Olivia Teel
Mike Halbfoerster
Robert Taylor

Greg Cryder
Ryan Knause
Craig Baer

Cathy Fletcher
D. Martin Zawarski,
ABDA Properties on 8th, LLC

Enclosures

Additional Comments Related to the Overall Land Development

PUBLIC WORKS

Stormwater Engineering

1. Existing and proposed impervious coverage areas shall be shown in square feet. A stormwater fee may be charged for an increase in impervious area.

Sanitary Engineering

2. 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 as necessary.
2. Proposed driveway on Carter Street shall be designed in accordance with City's driveway standards.
3. Deficient curb and sidewalk along the property shall be replaced in accordance with City standards.
4. 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. 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 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.
 - d. Prior to any work within the Right-of-Way, permits must be obtained from the City Engineering Office.

Electrical

1. Provide photo metrics plan for exterior lighting including light fixture specifications and mounting heights above finish grade.

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 1347.14.

Forestry

1. Please note SALDO 1349.08 "Planting: (a) To ensure that principles of good landscaping and design are adhered to and implemented, each site plan submitted for approval shall provide for: (1) The preservation of desirable existing trees and shrubs." There is a 34" diameter Willow Tree near the northwest corner of the subject parcel. Although the trunk is in its entirety on the adjacent parcel, 243 8th Avenue, the applicant shall explore all options to prevent disturbance within the drip line. It is recommended that the applicant consult with a licensed arborist and City Forester for best management practices. See also Zoning Note 1.
2. Include deciduous trees from the City of Bethlehem Approved Tree List in the parking lot area.
3. Include the City of Bethlehem planting detail on the landscape plan.

4. Submit a landscape plan with requirement calculations.

RECYCLING

1. The plan does not provide any details on how the property owner will maintain trash and recycling services for the dwelling units. Provide specific details such as the exact 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. See also Zoning Note 2.

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 shall confirm Fire Department vehicles have the required turning space to access all areas (Contact the fire department for turning radius information for fire department vehicle). Submit a turning plan and specifically address access to the rear parking area from Carter Street.
2. A Knox Box for the City of Bethlehem Fire Department access shall be installed (Add a note to plan and indicate location TBD).
3. Indicate if the building is planned to be sprinklered? If the building is 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."
4. All "Fire Lanes" or "Fire Department Access Roads" shall 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). Based on building height provided in comment #5, a "Fire Lane" *may* be required on 8th Ave, in front of the proposed building.
5. Sheet A2 of 2, elevations, indicates an overall building height of +/- 37'-8". 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 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 the fire department for detailed vehicle information). This again refers to the rear access from Carter Street.
7. 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.
8. The following drawings are required to be submitted for the Fire Department Review of Land Development Plans:
 - a. Utility plan, including water supply showing fire hydrants on or near the property.
 - b. Turning Plan.
 - c. Site Plan.
 - d. Grading Plan.

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. The Zoning Ordinance requires 1.5 parking spaces per dwelling unit, if existing streets are adequate for on-street parking. The minimum off-street parking requirement for six dwellings is nine spaces. The applicant should consider eliminating one or two spaces to limit disturbance near the Willow Tree and to reduce the amount of impervious coverage.
2. Although not specifically called out as a dumpster location, the area in the rear yard with symbol and note, “stockade fence” is to be used as a dumpster location, then the land development plans shall include details necessary to verify compliance with ZO §1318.26(a).
3. A third street tree is required along 8th avenue; Ref. ZO §1319.02(j)(1).
4. A deciduous shade tree is required in conjunction with the 11 parking spaces in the rear yard and conforming to the requirements of ZO §1319.02(j)(2).
5. Indicate on the plan the location for bicycle parking and define the storage method: hitch, rack, locker, or other.
6. Add a note to the Record Plan, “Bicycle Parking maintenance, the current landowner shall be responsible to ensure that the hitch, rack or locker continues to be available and is well maintained and is replaced if damaged or removed. If the hitch, rack or locker is within a street Right of Way, a City encroachment permit shall be required.”
7. Provide details for the proposed retaining wall, indicate the material and provide elevations for the top of wall and bottom of wall.
8. For the land development submission, include a lighting plan and parking lot details, such as curbing and bumper stops.

GENERAL

1. A Recreation Fee of \$9,000.00 shall be paid at the time of execution of the developer’s agreement.
2. Provide guest and tenant access between the parking lot and the front entrance.
3. Plant species proposed along both side yards include a mix of Green Giants, Burning Bush and Crape Myrtle. When scaling the plans, the spacing appears to be 30” on center. This spacing does not permit the long-term health of the plantings. The applicant shall coordinate final species, quantity and spacing with the City Forester.
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, such as adjacent to retaining walls, and only then to the extent necessary. Grade shall be sloped away from the building footprint to permit required foundation plantings.
5. Add a Statement of Intent on the plan: Demolish the single-family detached dwelling and construct a three-story structure with gable roof, containing six multi-family dwellings (apartments). Site improvements include surface off-street parking for eleven vehicles, with ingress and egress from Carter Street; retaining walls; dumpster enclosure; on-site stormwater management facilities and landscaping.
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.