



# CITY OF BETHLEHEM

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

BUREAU OF PLANNING AND ZONING

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August 11, 2025

Ana Martins, P.E.

Van Cleef Engineering Associates

RE: **(25-007 Sketch Plan Review) – 25070003 – 906 EVANS STREET – SKETCH PLAN REVIEW – Ward 5, Zoned RT, plans dated July 2, 2025.**

Dear Ana,

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:

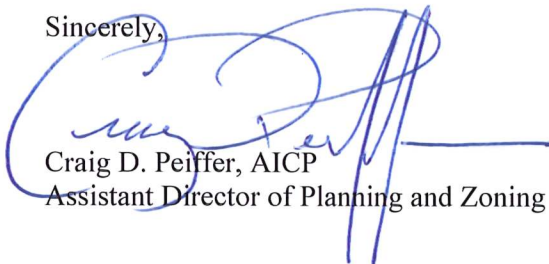
1. Provide schematic elevations of the proposed new structure and indicate building height and label exterior finishes; these shall be submitted prior to or at the Planning Commission Meeting.
2. For the purpose of determining yard setbacks, the parcel is deemed to have two front yards, Perry Street and Evans Street. Mechanic Street is an alley, and therefore cannot be a front yard, and is more appropriate as a side yard. The lot line adjacent to the parcel, 902 Evans Street/309 Hayes Street, is more appropriate as a rear yard. Ref. 1302.69, whereas the applicant may choose the principal front yard; 1306.05 for build-to line for front building setback in the RT District; and 1318.07 for front and side yards for corner lots.
3. Zoning Relief. The Applicant shall submit an Appeal Application for the following relief:
  - a. A Dimensional Variance to reduce the minimum lot area per dwelling unit, 1,200 SF per dwelling required, 187 SF per dwelling proposed, or 14 dwellings permitted, 96 dwellings proposed.
  - b. A Dimensional Variance to reduce the minimum front yard setback, 10' required; 0.6' along Perry Street and 2.8' to ~5' along Evans Street proposed.
  - c. A Dimensional Variance to reduce the minimum side yard setback, 15' plus 6" additional setback for every one foot of building height over 35' required, 0.5' along Mechanic Street proposed. Ref. 1306.01(a)(4)(footnote f) and 1322.03(II)(7)(ii).
  - d. A Dimensional Variance to reduce the minimum rear yard setback, 20' plus 6" additional setback for every one foot of building height over 35' required, 5.6' to ~14.5' proposed. Ref. 1306.01(a)(4)(footnote f) and 1322.03(II)(7)(ii).
  - e. A Dimensional Variance to increase the maximum height, maximum number of stories, 3.5 permitted, 7 proposed.
  - f. A Dimensional Variance to increase the maximum height, maximum feet, 40' permitted, greater than 40' proposed.

- g. A Variance to reduce the width of a buffer yard, where six or more apartment dwellings are proposed abutting a lot containing an existing single-family detached dwelling, 15' required, 5.6' to ~14.5' proposed.
  - h. A Special Exception, or in the alternative, a Variance to reduce the minimum required off-street parking, 168 spaces required, 91 spaces proposed, of which nine are tandem or stacked; Ref. 1319.01(a)(1)(ii) and 1319.02(b)(6). See also Traffic Comment 2 and Zoning Comment 7. The applicant shall also verify if any existing spaces serve the adjacent parcel, 865 E 4<sup>th</sup> Street/866 Mechanic Street, and if so, how these spaces will be accommodated in the new structure or using nearby parking.
4. The plan lacks sufficient detail to understand tenant loading and unloading, tenant and guest drop off and pick up and e-commerce deliveries. Further comment may be provided upon receipt of more detailed architectural plans.
  5. Adjacent context. To the north, opposite Evans Street, is a single-story commercial structure, n/f PNC Bank and two-story, single-family attached dwellings (row homes). To the east, opposite Perry Street, is a two-and-one-half-story, two-unit conversion and a two-story, single-family attached dwelling (row home). To the south, opposite Mechanic Street, is a one- to three-story commercial structure and three-story apartment building. To the west, is a two-and-one-half-story, single family detached dwelling and a one-story commercial structure, n/f M&N Tire & Auto Service.
  6. While it is notable that the applicant proposes to infill a largely vacant parking lot with multi-family dwellings, the Planning and Zoning Bureau has concerns with the proposed density, massing, height and limited off-street parking. The applicant is encouraged to re-submit a plan that requires less variances, and if necessary, are more de minimis in their nature, and a plan that is more in-keeping with the neighborhood context.

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

**This plan will be placed on the August 14, 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	Greg Cryder	Sam Jacobs,
	Adam Herbold	Ryan Knause	Mike Halbfoerster	Herald Equities Group
	Cathy Fletcher	Olivia Teel		Motti Hershkop,
	David Taylor	Robert Taylor		Maydeer Group

Enclosures

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

### **PUBLIC WORKS**

#### **Stormwater Engineering**

1. Existing and proposed impervious coverage needs to be shown on the recorded sheet in square feet.

#### **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 (PaDEP).

#### **Miscellaneous Engineering**

1. Existing and proposed features, including, but not limited to, utilities and trees, shall be shown on separate plans.
2. Existing and proposed lot monuments/iron pins shall be shown on the plan.
3. A stormwater management report shall be submitted to the City and to LVPC. A copy of the LVPC review letter shall be submitted to the City.
4. The City proposes unit addressing as attached in the marked-up floorplan. If you have concerns, then please provide them with the comment response letter.
5. Remove existing driveway apron and replace with City standard sidewalk & curb. Proposed driveway aprons shall comply with current City standards.
6. Sidewalk shall be replaced along the entire Mechanic St frontage. Additional curbing & sidewalk may also be required to be replaced and will be evaluated at the time of land development review.
7. Accessible sidewalk ramps at property corners of Mechanic, Perry, & Evans Streets shall be installed to current ADA standard with "Brick Red" detectable warning surface.
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 CD Rom 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 City Engineering Office.

#### **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.
2. The streets surrounding the property, Mechanic Street, Hayes Street, and Evans Street do not have on-street parking adjacent to the subject parcel. The only on-street parking is on the opposite side of Perry Street and is currently used by residents of the neighboring properties. Due to the lack of available on-street parking, the applicant shall advise of their plans to alleviate parking stress and prevent potentially dangerous and illegal on-street parking.



## **Forestry**

1. Submit a landscape plan with requirement calculations. Landscaping shall include, but is not limited to, street trees, buffer plantings and foundation plantings.

## **Electrical**

1. Provide exterior building and sidewalk lighting with mounting heights and photometric foot candle diagrams:
  - a. Lighting will need to be provided at the entrance / exit on Evans Street on Level 1 parking.
  - b. Lighting will need to be provided at the entrance / exit on Perry Street on Level 2 parking.
2. It appears that the utility pole on Perry Street is in the middle of the proposed entrance / exit, and if the plan is approved, then it will need to be relocated.

## **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.

## **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 us for turning radius information for our vehicles and submit a turning plan.
2. A Knox Box for the City of Bethlehem Fire Department access shall be installed. Add a note to plan and with location TBD.
3. 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."
  - a. Buildings equipped with a standpipe system shall have a fire hydrant within 100 feet of the fire department connections; Ref. 2018 IFC 507.5.1.
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).
5. Indicate the proposed building height.
  - a. 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. Add a note to plan acknowledging that Chapter 33 of the IFC "Fire Safety During Construction and Demolition" will be enforced for the duration of the construction project.
7. 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 the property.
  - b. Turning Plan.
  - c. Grading Plan.
  - d. Elevation Drawing, or other documentation indicating proposed building height.

8. Additional drawings may be required based on the individual project.

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. It is recommended that the applicant retain an architect to determine if the project can be constructed as submitted, and in consideration of adjacent widths of rights-of-way, Fire Department access and International Construction Code requirements.
2. As sheet 4 of 4 is an Existing Features Plan, remove the existing features from Sheet 1 of 4.
3. Submit an elevation drawing(s).
4. Catalog all adjacent uses and show them on site plan. Indicate the height and number of stories of any adjacent multi-family buildings; Ref. ZO §1322.03(ii)(iii).
5. Revise the Zoning Data Table to specify a proposed building height(s).
6. Revise the Zoning Data Table setbacks to reflect the proposed building height and the requirements of ZO §§1322.03(II)(ii) and (iii). Provide the calculations and revise the required setbacks accordingly.
7. Catalog and map available on-street parking adjacent to the proposed project; if compliance with ZO §1319.01(a)(1)(ii). If available on-street parking is inadequate to achieve 1.5 spaces per dwelling unit, then add the additional .25 requirement, and provide for this number on-site, or indicate the location and quantity of spaces for off-site cluster parking.
8. The applicant has identified seven (7) items that will require variances from the City of Bethlehem's Zoning Hearing Board. Once complete plans are provided and other comments addressed, then the amount and intensity of required relief may change.

### **GENERAL**

1. A recreation fee of \$144,000 will be required at the time of execution of the developer's agreement.
2. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development.
3. Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
4. 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.
5. The project is on a parcel currently designated as eligible for Keystone Innovation Zone (KIZ) Tax Abatement. To discuss whether the project would qualify, please contact Alex Miller, Economic Development Coordinator, 610.865.4347, or [amiller@bethlehem-pa.gov](mailto:amiller@bethlehem-pa.gov).

