



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

March 6, 2026

Joseph Rentko



RE: (26-002 LD) – 26020001 – 1224 EATON AVENUE – LAND DEVELOPMENT PLAN – Ward 13,
Zoned RG, plans dated February 2, 2026.

Dear Mr. Rentko,

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 \$12,635.00 shall be paid. The amount has been determined based on the submitted sanitary sewer facilities planning module application.
2. A sewer planning module package has been provided to the City with this submission to be reviewed by the Bureau of Engineering staff and forwarded on to the Pennsylvania Department of Environmental Protection (PADEP). Please note that building permits cannot be issued until the Planning Module is reviewed and approved by the PADEP.

Stormwater Engineering

1. Pursuant to Article 925 of the City's Codified Ordinance, a stormwater escrow fee of \$874.90 shall be paid at the time of execution of the developer's agreement. The fee is based upon the proposed increase in impervious coverage.
2. A stormwater management plan shall be submitted to the City for review showing stormwater being managed onsite.

Miscellaneous Engineering

1. Provide the owner's contact information on Sheet 1 of 6, Record Plan.
2. Include the deed book number in Site Data on Sheet 1 of 6, Record Plan.
3. Project title on Sheet 1 of 6, Record Plan, indicates that the property is located in Northampton County. Correct this to Lehigh County.
4. Street address for proposed homes will now be 1222 Eaton Ave due to the relocation of the driveway to eastern edge of property. The existing structure will retain 1224 Eaton Ave. Indicate street address of proposed units on Sheet 1 of 6, Record Plan.
5. The parcel address will now be 1222-1224 Eaton Ave.
6. Indicate the slope of driveway on Sheets 1 & 2, Record Plan and Existing Features, Grading and Utility Plan.
7. Dimension the existing features plan, proposed dumpster enclosure and bike rack features on Sheets 1 & 2, Record Plan and Existing Features, Grading and Utility Plan.

Forestry

1. Sheet 3 of 6, Lighting and Landscaping Plan, Plant List: Street & Parking Lot Trees, indicates ten (10) AB-Trident Maple trees, and two (2) AR-October Glory trees; whereas the plan indicates seven (7) AB-Trident Maple trees and five (5) AR-October Glory trees. Correct the schedule or plan accordingly.

Electrical

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

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. All 'Fire Lanes' or "Fire Department Access Roads" must be identified and properly marked. Fire Lane signage will be required along the East side of the driveway (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information). The specific locations for signs and markings can be determined as the project progresses.
2. Dead end fire access roadways may have a maximum length of 150' without a turnaround (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information). Provide code compliant turn around and associated turn plan.

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

ZONING

1. Sheet 1 of 6, Record Plan, indicate on the plan the number of existing parking spaces to remain (2) and the number of proposed new parking spaces (11). Provide dimensions for the existing parking spaces.
2. Sheet 1 of 6, Record Plan, provide for one ADA compliant parking space; Ref. 1319.02(n).
3. Provide pedestrian access from Eaton Avenue to each dwelling; Ref. 1322.02(d)(3). Pedestrian traffic shall be separated from major vehicle routes. Development should be designed in such a way as to be inviting for pedestrian traffic and to provide convenient walking routes from public transit stops. Individual buildings and pedestrian entrances and parking areas shall be laid out to promote pedestrian access among different users.

GENERAL

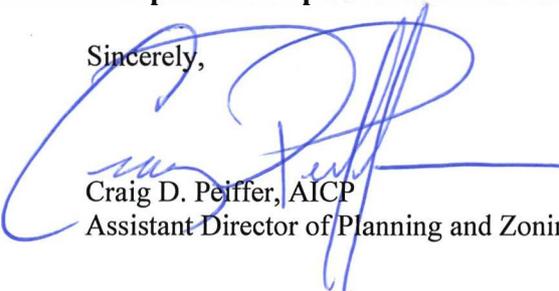
1. A Recreation Fee of \$7,500.00 shall be paid at the time of execution of the developer's agreement.
2. Provide architectural floor plans and label each room (these shall be submitted in paper and e-format prior to the Planning Commission Meeting).
3. Provide architectural elevations and indicate building height and label exterior finishes (these shall be submitted in paper and e-format prior to the Planning Commission Meeting).
4. Sheet 1 of 6, Record Plan, 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.
5. Sheet 1 of 6, Record Plan, Narrative, correct the second sentence to, "This proposal is a permitted use..."
6. Sheet 1 of 6, Record Plan, Narrative, correct the third sentence to, "At their November 19, 2025, and December 17, 2025 Hearings, the Zoning Hearing Board granted dimensional variances for minimum lot area per dwelling,

minimum width for two-way parking aisle and minimum setback for a driveway, with Written Decision dated January 30, 2026.

7. Sheet 1 of 6, Record Plan, and 2 of 6, Existing Features, Grading and Utility Plan, Indicate on the plan the location of PPL Pole #10119.
8. Sheet 2 of 6, Existing Features, Grading and Utility Plan, indicate on the plan the location of the five existing trees to be removed and their caliper as measured 4.5' above ground level.
9. Sheet 2 of 6, Existing Features, Grading and Utility Plan, Existing Features, remove the note, "Bicycle Rack (Typ.)."
10. Sheet 2 of 6, Existing Features, Grading and Utility Plan, Grading and Utility, indicate the height of the split rail fence, and if applicable, denote any proposed mesh.
11. Sheet 3 of 6, Lighting and Landscaping Plan, account for SALDO 1349.19(G); An average minimum of one deciduous or evergreen tree shall be required to be planted and then maintained for every 4,000 square feet of [new] impervious surface.
12. Sheet 3 of 6, Lighting and Landscaping Plan, the stormwater detention pond should be landscaped using water tolerant, native species that promote pollinators and migratory birds.
13. Sheet 3 of 6, Lighting and Landscaping Plan, 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 required foundation plantings.
14. Comments from the Environmental Advisory Council are enclosed for your review and comments. Please make sure responses are provided for the letter when the revised plans are submitted.
15. 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.
16. 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 March 12, 2026, Planning Commission Agenda.

Sincerely,



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

C.	Geoffrey Karanja	Craig Baer	Greg Cryder
	Adam Herbold	Olivia Teel	Michael Halbforester
	David Taylor	Robert Taylor	Ryan Knause
	Cathy Fletcher		

Enc.



February 21, 2025

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

Dear Mr. Peiffer,

We appreciate the opportunity to comment on the proposed building expansion on 1224 Eaton Avenue. 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.

Acknowledgements

- We applaud the developer for including a bicycle rack. Bethlehem continues to promote and make bicycle traffic safer in the city. We recommend that the bicycle rack be covered to protect it from weather. The CAP recommends "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9).

Strong recommendations

- Five trees will be cut down to make new driveway. The plans show an addition of 7 Trident Maples and 5 October Glory trees will be planted. Consider adding some of these trees along the border of the turnaround space to add shade coverage to the impervious space. Note: The quantities in the Plant List box do not agree with the plan.
- There is a large increase in impervious surface. There will be lots of water runoff from roofs and parking lot/driveway. It is not clear from the plans how this water will be directed to the infiltration basin. It is a requirement that neighboring properties be protected from the water runoff from the roofs. Water flow across the driveway must be unimpeded from traveling to

the infiltration basin, especially in winter where snow and ice buildup may impede this flow.

- The infiltration basin is shown as an open piece of land, which we assume will be grass that needs to be mowed. We recommend installing a 'rain garden' comprised of native plants that can thrive in heavy water and include trees that do well in wet conditions (e.g. Serviceberry or Red Maple). We believe this will add esthetic value for residents and increase the overall property value. It will also reduce operating costs because it will not need to be regularly mowed.
- Consider reducing the cartway width on the driveway from 20 ft to 18 ft. A 2 ft vegetation buffer could be placed between residences and parking spaces. This reduces the amount of impervious surface.
- Dumpster space – ensure this space allows room for both trash and recycling containers. There must be clear labeling to ensure that residents know which materials to put in the recycling container.
- If not planned, we suggest the addition of level 2 EV charging ports located on the front of the buildings, near the parking spaces, in support of the CAP (Transportation Strategies T3.1 and T3.4). There may be rebates or tax incentives for these ports.
- We 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 like Heat Pumps, increased insulation and water conservation and indoor air quality measures.
- Furthermore, we strongly recommend that the developer perform a solar assessment, and if feasible, include a rooftop solar system. At a minimum, the building could be constructed with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date.

Additional Considerations

- Consider adding a basketball hoop or 4 square court for tenant use.
- To reduce vehicle parking requirements, the developer can commit to subsidizing public transit service. See Bethlehem Zoning Ordinance Article 1319.02.6.d (page 136). A reduction will reduce impervious surface coverage reducing stormwater runoff.
- Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that allows financing for solar, increased energy efficiency, water conservation, and indoor air quality measures 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. The Sustainable Energy Fund (SEF) administers the C-PACE program for Northampton County and can provide information on the program (www.theSEF.org).
- Maintaining greenspace and trees that absorb CO2 are important in meeting the city's CAP goals. Landscaping is important and we recommend consulting with the City Forester in the selection of native species for trees and bushes around the building that will best tolerate the increasing heat and precipitation resulting from

climate change. Also consider using trees that promote native species sustainability (e.g. Oak trees). Rather than a green lawn surrounding the building, consideration could be given to using native plants/grasses that will retain soil, provide pollinator habitat and do not need to be mowed. This low maintenance measure would provide a savings on landscape services and reduce greenhouse gas emissions from mowing.

- Consider LEED guidelines in the building structure. Adopting LEED guidelines will lower utility costs, provide healthier air, and yield higher asset value.

Thank you for your consideration.

Sincerely,

Steve Olshevski, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Megan Lysowski

Mandy Tolino

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds



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Department of Fire
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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.

Bethlehem Fire Department



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1501.02 PERMITS REQUIRED.

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.

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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.

(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

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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.

(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

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Insert 901.6.3.2.2 Records shall be provided within 30 days of the date of inspection, testing, or maintenance

(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.

Bethlehem Fire Department