



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

August 18, 2026

David Ronca

RE: **(26-004 Sketch Plan Review) – 26060003 – 1438 STEFKO BOULEVARD – SKETCH PLAN REVIEW – Ward 15, Zoned CG, plans dated March 30, 2026.**

Dear Mr. Ronca,

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.

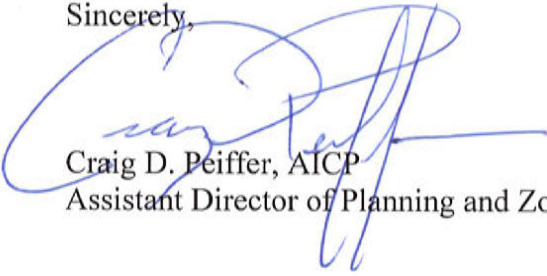
At this point we offer the following sketch plan comments:

1. Zoning Relief. The Applicant shall submit an Appeal Application for the following relief:
 - a. A Variance to eliminate the requirement for a principal commercial use on the front street level; Ref. 1305.01(a) footnote 1.
 - b. A Dimensional Variance to reduce the lot area per dwelling, 1,200 SF/DU required, 666 SF/DU proposed, or 10 dwellings permitted, 18 dwellings proposed; Ref. 1306.01(b)(3)(a). See also Comments #2 and #3 below.
 - c. A Variance to reduce the minimum required off-street parking, 32 spaces required, 17 proposed; Ref. 1319.01(a)(1)(ii). Street parking is not available on Stefko Boulevard; therefore, the parking calculation is 1.75 spaces per dwelling unit.
2. Workforce Housing incentives are not available for parcels located in the CG (General Commercial) Zoning District. [1307.01].
3. Workforce Housing incentives are not available for projects creating less than 20 Dwelling Units. [1307.02].
4. Provide architectural elevations or rendered perspectives for each façade and label exterior finishes (this item should be submitted in paper or e-format prior to the Planning Commission Meeting). The applicants are encouraged to provide masonry on the facades facing Peters Street and Croft Street.
5. The City commends the Applicants for proposing "Workforce-Focused" affordable housing. For information on the City's Housing Policies and Incentives, contact Emily Folenta at 610.419.0616, or efolenta@bethlehem-pa.gov.

Additional comments to be addressed at the land development plan review stage are attached.

This plan will be placed on the August 25, 2026, 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)(v), 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. | Dylan Schollser | Craig Baer | Robert Taylor |
| | Adam Herbold | Ryan Knause | Greg Cryder |
| | Cathy Fletcher | Andrew Danga-Storm | Mike Halbfoerster |
| | David Taylor | | |

Enclosure

Additional Comments Related to the Overall Land Development

PUBLIC WORKS

Stormwater Engineering

1. Provide the existing and proposed impervious coverage in the site data. If there shall be greater than 10,000 SF of new impervious cover, then a stormwater management report shall be submitted to the City and LVPC and a copy of the LVPC review letter shall be submitted to the City.
2. Per Article 925 of the City Codified Ordinance, a stormwater escrow charge of \$0.10 per square foot will be assessed based on the increase in impervious cover.

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 shall 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.
2. The *estimated* tapping fee at this time is \$27,797.00 pending review of planning module documents.

Miscellaneous Engineering

1. Existing and proposed lot monuments/iron pins shall be shown on the plan.
2. Per Article 909 of the City Codified Ordinance, any deficient curbing and sidewalk along Stefko Blvd shall be removed and replaced in compliance with City standards.
3. The ADA curb ramp at the intersection of Croft Street and Stefko Boulevard shall be updated to current ADA standards.
4. Provide all relevant City standard details for improvements within the public right-of-way on the plan. A note stating that, "all improvements within the public right-of way shall be constructed to City standard," shall be added to the record plan.
5. Set a curbline along Croft Street and Peters Street, the cartway shall be 14'. A warrant of survey is required.
6. The Bureau of Engineering recommends a pathway be constructed from the parking spaces along Peters Street to the proposed structure, either through the private property or in the form of a 3' sidewalk within the right-of-way to connect the two parking areas. See also General Comment #2.
7. Provide a plan showing all utility connections.
8. The City proposes the unit addresses of Apts. 101-106, 201-206, 301-306 for each of the three floors. Applicants shall submit floor plans showing this layout.
9. A 10' drainage and utility easement is required along the sides and rear of the property. The following note shall be added to the plan:
 - a. The drainage easement provides for the flow of storm water across lots, and may not be altered without the written permission of the City Engineer. No obstructions such as planting berms or fences may be installed in the drainage easements areas without sufficient provision for the passage of storm water, and any such proposed provision shall be approved in writing by the City Engineer.
10. The following notes are required on 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 shall be obtained from the City's Engineering Office.

Traffic

1. Trip generation calculations shall be submitted for the plan, so that it can be determined if a traffic study is required per the Subdivision and Land Development Ordinance (SALDO), Section 1349.04(M).
2. A stop sign (R1-1) shall be installed at the intersection of Peters Street and Croft Street.
3. A sign inventory/tabulation shall be included on the plans.

Forestry

1. Submit a landscape plan with compliance chart calculations and reference SALDO section 1349.19 and Zoning Ordinance Section 1319.02(j).
2. Any trees that are to be removed or pruned or newly installed within the public right of way shall require a street tree permit and the work shall be performed by a licensed arborist.

Electric

1. Provide a lighting plan and include lighting for the building entry and proposed parking spaces along both Croft Street and Peters Street.

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. *Approved* fire apparatus access roads shall extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior. 2018 IFC 503.1. Croft Street shall be improved to provide a fire apparatus access road/fire lane meeting this requirement.
2. A Knox Box for City of Bethlehem Fire Department access shall be installed. Add a note to the plans and indicate location TBD.
3. Indicate if the building is or will 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 shall 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.
5. Indicate the proposed building height. Provide overall building height, height from grade plane to the highest roof surface (For purposes of this section, the highest roof surface shall be determined by measurement to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater).
 - a. All buildings less than 30 feet in height shall have 20-foot-wide minimum access road(s).
 - b. All buildings 30 feet or greater in height shall 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 the 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.
7. The following drawings are required to be submitted for Fire Department Review of Land Development Plans:
 - a. Utility plans to include water supply showing fire hydrants on or near the property.

- b. Turning Plan.
 - c. Site Plan.
 - d. Grading Plan.
 - e. Elevation Plan (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 (<mailto:cbaer@bethlehem-pa.gov>) or Chief Fire Inspector Lucas Fuller (<mailto:lfuller@bethlehem-pa.gov>) with any questions, reference Fire Code requirements or to obtain any documents required to complete the submittal for review.

RECYCLING

1. The plans do not provide any details on how the property owner will maintain trash and recycling services for the apartment units. Provide specific details such as 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.

ZONING

1. Submit a site plan with larger font, specifically for Zoning Data.
2. The scale is incorrectly noted as 1" = 20', and whereas it appears both that both the graphic scale and plan are printed at 50 scale.
3. If the plan intent is to utilize Workforce Housing provisions of Article 1307 for increased density, then the submitted plan shall include these calculations in the Zoning Data.
4. The accessible parking space depicted on the renderings shall be fully depicted on the site plan to demonstrate compliance with 1319.02(n).
5. At minimum, provide the following plans: lighting, landscaping and grading.

GENERAL

1. A recreation fee of \$27,000 (\$1,500 x 18 dwellings) shall be paid at the time of execution of the developer's agreement. The City shall waive these fees for any residential unit(s) that utilize any federal, state, or local public funds, tax credits, or other similar financial programs in which the owner agrees to keep the housing units affordable for low- and moderate-income residents based on the affordability guidelines in the specific program or programs used in financing the housing units; Ref. 1349.07(B)(2). The parcel is located within an area eligible for the Federal Housing and Urban Development Low/Mod Program.
2. Provide pedestrian access connecting all parking spaces to the front entrance (this is depicted on the rendered plans, but excluded from the site plan).
3. Provide a statement of intent on the plan.
4. 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 42095C0263E, effective on 7/16/2014.
5. 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."
6. 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 recommended foundation plantings.
7. Applicants are 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, native species and promote pollinators.
 - c. Direct stormwater from roof downspouts into suitable vegetative areas.
8. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
9. The Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
10. 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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(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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(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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(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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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.

Bethlehem Fire Department



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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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side of the building. (Refer to International Fire Code, 2018 ed., Section 503 and Appendix D for additional information.)

6. Add 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.

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

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) or Chief Fire Inspector Lucas Fuller (lfuller@bethlehem-pa.gov) with any question reference Fire Code requirements or to obtain any documents required to complete the submittal for review.