CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

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November 11, 2026

Mary Bachert
Bohler, LLC
74 West Broad Street, Suite 500
Bethlehem, PA 18018

RE: **(26-008 LD) –26080002– 2184 INDUSTRIAL DRIVE – MAJOR LAND DEVELOPMENT PLAN – Ward 13, Zoned PI, plans dated August 13, 2026, last revised October 16, 2026.**

Dear Ms. Bachert,

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 $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 (PaDEP).

   Applicants have acknowledged that building permits cannot be issued until the Planning Module is submitted, reviewed and approved by PaDEP and the tapping fee shall be paid at the time of execution of the developer's agreement.

Stormwater Engineering

1. In accordance with Article 925, a stormwater charge of $0.10 per square foot ($9,466.20) shall be assessed based on the increase in impervious cover per.

   Applicants have acknowledged that an impervious cover fee shall be paid at the time of execution of the developer's agreement.
2. Sheet C-301, "Bulk Requirements" table, the item "Max Lot Coverage" shall be changed to " Max Impervious Lot Coverage".
3. Applicants have acknowledged that an approved NPDES permit shall be provided to the City prior to issuance of building permits.
4. Sheet C-601, Sanitary & Storm Profiles shall be revised, the overlapping labels make the plans difficult to interpret.
5. Sheet C-806, Soil Erosion and Sediment Control Plan, shall be revised to have the CFS above the existing headwall along the swale.
6. BMP B-10 shall be revaluated due to direct runoff onto the adjacent parcel # 641847366798.
7. Sheet C-201, Existing Conditions/Demolition Plan, shall include a label for the existing swale along the east side of the property.

Miscellaneous Engineering

1. The Engineering Department supports the request for a waiver of §1349.12.A to allow for larger driveway entrances on Avenue B & Industrial Drive provided that other City driveway comments have been addressed.
2. Driveway entrances shall be constructed of asphalt, without an apron. Sidewalks shall end at the ADA curb ramps at either side of the respective driveways. A crosswalk shall be painted across the entrance of the driveway between the ramps.
3. Sheet C-402, slopes, cross slopes, and dimensions of all ADA curb ramps shall be shown on the plan.
4. The applicant has acknowledged that the following notes will be complied with, but they do not appear in the plans provided. These notes shall be added to the record plan notes.
    a. 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.
    b. 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.
    c. Prior to any work within the Right-of-Way, permits must be obtained from City Engineering Office.
    d. All improvements within the public ROW shall comply with the City of Bethlehem standards and specifications and the appropriate public utility authorities.

Forestry

1. Provide justification as to why the number of required trees based on the proposed impervious area cannot be met. Applicants shall provide citations or recommendations from the Department of Homeland Security.

Fire

1. Storage tank locations are generally reviewed and approved during the land development process due to right of way setbacks, property line setbacks and the required clearance(s) to buildings. Provide all required setback and clearance measurements for the current tank locations. Any change to the tank locations may require an additional/updated land development submittal.

ZONING

1. The allowable height of the building is determined "from the average elevation of the proposed finished grade at the front of the building to…top of parapet wall of a flat roof…" [ZO § 1302.55]. The Avenue B frontage is the declared Front Yard; the north elevation is where the building's height is determined. The 'Screen' extending up from the top of the walls meets the definition of a parapet. ZO section 1306.01(b)6 limits the maximum height of buildings in the PI (Planned Industrial) zoning district to 60'; the west elevation proposes 63'. Applicant notes that ZO section 1318.20(b) provides an exemption for "parapet walls which extend not more than 4 feet above the limiting height". However, this exemption limits "Any such structures shall not have a horizontal area greater than 25 percent of the roof area of the building" . The area enclosed by the parapet exceeds 25%.
2. 1306.06(a) requires "a minimum of 20 percent of the lot area shall be landscaped with trees and shrubs." The referenced section states "trees and shrubs;" the lawn areas shall not be credited as contributing to this requirement. Using a scale, a bank of trees along the western property line was determined to be approximately 16,000 SF, and an area in the southeast portion of the property was determined to be

approximately 15,400 SF. Per Applicants calculations, 59,233.4 SF area of "trees and shrubs" are required. The landscaping plan shall define and dimension these areas to verify their calculations.

3. 1319.02(o) requires "[Bicycle] Racks shall be within 30 feet of building entrance." This section is interpreted to require exterior bicycle racks that are readily available to all visitors to the facility. While it is acknowledged that the proposed scheme satisfies the desired goal of "Covered parking is encouraged where possible," requiring visitors to travel ~60' through the vestibule, lobby and loading dock in order to secure a bicycle cannot be approved; therefore, the applicants shall modify the rack location.
4. The building is accessed by a long, un-dimensioned ramp, and a utility stair appears to intrude into the path leading to the ramp. Applicants shall verify the length of runs of the ramp, mid-slope landing dimensions and pathway width to comply with UCC requirements in order to verify the accuracy of the submitted design footprint.

GENERAL

1. A Recreation Fee of $12,769.00 (100,000 SF x $0.10 = $10,000 + 31,380 SF x $0.05 = $1,569 + $1,200) shall be paid at the time of execution of the developer's agreement.
2. Sheet L-101, Landscape Plan, SALDO 1349.19(H)(1), this area shall be landscaped in trees and shrubs and with a vegetative ground cover. Provide a plant schedule for this required landscaping and denote locations on the plan.

   If the Applicants cannot reasonably accommodate the minimum required landscaping, then they may seek variances, waivers and/or payments in lieu of and at the discretion of the City Forester.

3. The City of Bethlehem has drafted revisions to the City's Zoning Ordinance pertaining to Data Centers. While the City recognizes that this development will be reviewed under the current ordinance, the City requests that the applicants provide a written response to the proposed amendment, and specifically address Additional Requirements for Specific Uses, subparagraph (q), All required plans, studies, evaluations, assessments and strategies, items 1-16 (attached hereto).
4. Pursuant to Pennsylvania Governor Josh Shapiro's Executive Order, 2026-05, and attached hereto, applicants shall describe how they will comply with the Order and which permitting path they will choose to seek approval from PaDEP.

   The City recognizes that the Applicants are currently evaluating the various permitting processes. This comment shall remain contingent to the approval process.

When these comments are addressed, please submit two (2) full sets of revised plans, two (2) partial sets of revised plans for Forestry and Fire, an electronic plan, and a comment/response letter for further review.

This plan will be placed on the November 12, 2026, Planning Commission Agenda.

Sincerely,

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

C. Dylan Schlosser
Adam Herbold
Cathy Fletcher
David Taylor
Craig Baer
Ryan Knause
Robert Taylor
Greg Cryder
Andrew Danga-Storm
Michael Halbforester
Tony Ganguzza
Boyle Construction