



# CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

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December 17, 2025

Mary Bachert  
Bohler Engineering PA, LLC

RE: **(25-009 LD) – 25110004– 320 EAST FIRST STREET (STEEL ICE) – LAND DEVELOPMENT PLAN – Ward 3, Zoned IR, Plans dated November 11, 2025.**

Dear Mr. 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 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. Building permits cannot be issued until the Planning Module is reviewed and approved by the Pennsylvania Department of Environmental Protection (PaDEP).

### **Stormwater Engineering**

1. Sheet C-301, Site Plan, Provide existing and proposed impervious coverage in square feet.
2. Provide a copy of the NPDES permit once approved by PaDEP.

### **Miscellaneous Engineering**

1. Sheet C-101, Cover Sheet, Remove the "Standard Notes" section, as they are listed twice.
2. A legal description of the proposed Utility Easement shall be submitted for review. The developer shall be responsible for preparing the necessary easement forms and recording at Northampton County. The existing underground electric line shall be relocated before the proposed 35' utility easement can be recorded. See also General Comment #1 below.

### **Forestry**

1. Fourteen (14) street trees are required along Polk Street, whereas only eleven (11) are shown as existing to remain on Sheet L-101, Landscape Plan. Referring to Zoning Comment #1 from the sketch plan review letter, add street trees to comply with ZO 1319.02(j) along this area of Polk Street. See also Zoning Comment #1 below.

### **Traffic**

1. Provide a description of actions proposed to alleviate traffic impacts on First Street and on Polk Street during busy events. See also General Comment #8.

### **Electrical**

1. Comments, if any, from the City's Electrician will be sent separately.

**ZONING**

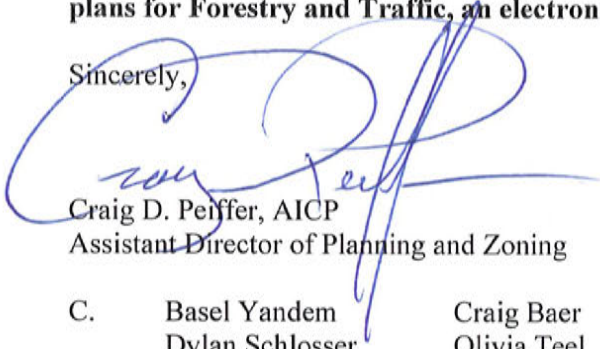
1. On Sheet L-101, Landscape Plan, Landscape Compliance Chart, Zoning Ordinance Section 1311.04(c) is cited as justification for omitting compliance with Street Tree requirements. However, the cited section was deleted from the current City of Bethlehem Zoning Ordinance by ordinance 2022-39 on December 21, 2022. East First Street is deficient by two trees and Polk Street is deficient by three trees. Provide justification for consideration by the City Forester to not supplement the existing trees with new trees to meet the minimum required count; Ref. 1319.02(j).
2. Sheet C-901, Construction Details, Trash Enclosure, gates shall be constructed using a weather resistant decorative board or vinyl; Ref. 1319.26(a).

**GENERAL**

1. Applicants shall submit a legal description and exhibit for the revised utility easement for review by the city and subsequent recording by the applicant. This shall be included under Additional Special Provisions within the Developer’s Agreement and recorded prior to the release of final security.
2. Applicants parking lot calculations reference the use of the adjacent 250 car parking lot (BethWorks Lot). Applicants shall provide written approval for the long-term use of the lot in a method suitable to the City.
3. Submit an opinion of probable cost estimate for the City’s review, approval and subsequent inclusion in the developer’s agreement.
4. Sheet C-101, Cover Sheet, remove the waiver request. The current SALDO, adopted by Ordinance 2025-39, allows for a Preliminary Plan option; however, the ordinance also provides for a combined Preliminary/Final Plan requirement. This plan has already been through the Sketch Plan process, so it may proceed to the Preliminary/Final process.
5. Sheet C-101, Cover Sheet, Sheet Index, add Vehicle Circulation Plan, C-303.
6. Sheet L-101, Landscape Plan, Landscape Compliance Chart, SALDO 1349.19, Requirement, this language is from the old SALDO, and shall be revised to reflect the following subsections:
  - a. 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.
  - b. 1349.19(H)(1) On principal commercial, industrial, institutional and multi-family apartment lots, a minimum of 10 percent of the lot area shall be landscaped in trees and shrubs, and with a vegetated ground cover.
7. 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.
8. The Applicant is encouraged to work with the Bethlehem Parking Authority for use of their adjacent Polk Street Garage for special events, and for long-term parking if the adjacent surface parking lot (BethWorks Lot) were to become unavailable or reach capacity. Contact Tiffany Wells, Bethlehem Parking Authority (BPA) at: [tiffany@bethpark.org](mailto:tiffany@bethpark.org).

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

Sincerely,



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

C. Basel Yandem  
Dylan Schlosser  
David Taylor  
Cathy Fletcher

Craig Baer  
Olivia Teel  
Robert Taylor

Greg Cryder  
Michael Halbforester  
Ryan Knause

Tiffany Wells, BPA  
Erin Liston, Boyle Construction  
Keith Krem, ENC, 23, LLC

Enclosure



December 14, 2025

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

Dear Ms. Fletcher and Mr. Peiffer,

We appreciate the opportunity to comment on the proposed development of 320 East First Street. 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. Therefore, we strongly 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, increased insulation and advanced air sealing techniques to reduce infiltration. In addition, a green roof would contribute to lessening the heat island effect, help lower the temperature inside the building and aid in stormwater management.

Furthermore, we strongly recommend that the developer include solar panels on the roof. An evaluation for a solar of a solar energy system can be done at no cost by a solar energy service provider. The building can then be constructed with adequate structural rooftop capacity and electrical rough-ins to support a solar energy system.

Northampton County adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that provides long-term financing for renewable energy, energy efficiency, water conservation, indoor air quality and resiliency projects 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. These initiatives not only lower greenhouse gas emissions but also deliver long-term energy cost savings. The Sustainable Energy Fund (SEF) administers the C-PACE program for Northampton County and can provide information on the program ([www.theSEF.org](http://www.theSEF.org)).

Stormwater control, to be coordinated with the City Department of Public Works, is especially crucial with this project given its proximity to the Lehigh River, which was named the seventh most endangered river in the U.S. by American Rivers. Given the important recreational and habitat value of the river, runoff from the roofs and parking lots, which include contaminants such as heavy metals, should not enter the river directly. Any green infrastructure that can fit on the property (for example a rain garden) to capture stormwater is advised. In addition to contaminants, the increase in runoff as a result of a decrease in pervious area can cause erosion of riverbanks and increase flooding downstream.

It has come to our attention that the plans call for a Long-Term Operation and Maintenance Schedule for water quality filters and hydrodynamic devices (These are to be checked 2 times per year and replaced every three years regardless of condition). Essentially, stormwater will be filtered before discharge to the river.

Landscaping is important and we commend the protection measures listed to protect existing trees. 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. Native plantings do not need to be mowed and could provide a savings on landscape services and reduce greenhouse gas emissions from mowing.

In order to make the site more conducive to bicyclists, we suggest the inclusion of bicycle parking. The CAP recommends the inclusion of "easily-accessible, secure, sheltered bicycle parking" (Transportation Strategies T1.2 and T1.9).

We also recommend the addition of level 2 EV charging stations, another strategy in the CAP (Transportation Strategies T3.1 and T3.4). If possible, we suggest wiring the area for additional charging stations for future use.

Thank you for your consideration.

Sincerely,

*Lynn Rothman*

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Steve Olshevski

Mandy Tolino

Katie Trembler

cc: Bethlehem City Council

Mayor J. William Reynolds