



# CITY OF BETHLEHEM

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

BUREAU OF PLANNING AND ZONING

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June 8, 2026

Anthony Recchia

RE: **(26-003 Sketch Plan Review) – 26050007 – 52-62 EAST BROAD STREET – SKETCH PLAN REVIEW – Ward 7, Zoned CL, plans dated February 16, 2026, last revised April 28, 2026.**

Dear Mr. Recchia,

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:

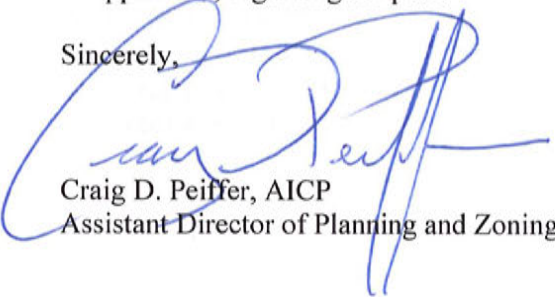
1. Zoning Relief. The Applicant shall submit an Appeal Application for the following relief:
  - a. A Dimensional Variance to reduce the lot area per dwelling, 1,200 SF/DU required, 690 SF/DU proposed.
  - b. A Dimensional Variance to reduce the side yard setback, 15' required, 4'-3" proposed.
  - c. A Specia Exception to maintain the nonconforming sizes for parking spaces and drive aisles or to reduce the minimum required off-street parking. See also Zoning Comment #4.
2. Applicants propose constructing a three-story brick and frame in-fill structure on the parcel at 56 E. Broad Street. The structure would contain an ~730 SF commercial use on the first floor front and nine multi-family dwellings on the first-floor rear, second and third floors. The applicants propose modifying the tenant spaces at 52 E. Broad Street, reducing it to ~523 SF and creating a tenth new dwelling to the overall site. The proposed plan would contain four commercial uses, 19 dwellings and 45 off-street parking spaces, 44 surface and one garage space.
3. Due to the existing shared parking arrangement, Applicants are encouraged to consolidate all four parcels.
4. Applicants shall provide a copy of the executed access easement providing drive aisle access from 68 E Broad Street to the parking spaces at 62 E Broad Street.
5. Per 1349.19(H)(1) and 1349.19(J), Applicants shall provide 10% of the lot area of 56 E Broad Street to be landscaped in trees and shrubs and with a vegetated ground cover. See also General Comment #5.
6. The City commends the Applicants for proposing infill construction of an appropriate scale, massing, height and fenestration that are reflective of the neighborhood context and complete the street wall in this block. Further, the project also achieves the goals of providing commercial space at the front street level promoting interaction between the semi-public and semi-private spaces, and the addition of ten dwellings in a location that supports greater density and helps to address the housing shortage.

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

**This plan will be placed on June 11, 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)(ii), 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. | Geoffrey Karanja | Craig Baer  | Robert Taylor     | Vincent Marucci, AIA    |
|    | Dylan Schollser  | Ryan Knause | Greg Cryder       | Entropy Consulting, LLC |
|    | Cathy Fletcher   | Olivia Teel | Mike Halbfoerster |                         |
|    | David Taylor     |             |                   |                         |

Enclosure

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

### **PUBLIC WORKS**

#### **Stormwater Engineering**

1. Existing and proposed impervious coverage shall be shown on the plan 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 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.

#### **Miscellaneous Engineering**

1. Existing and proposed features, including, but not limited to, utilities and trees, shall be shown on separate plans.
2. Submit a legal description for each lot being consolidated.
3. Prior to any work within the Right-of-Way, permits shall be obtained from City's Engineering Office.
4. 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. 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 be provided electronically or 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.

#### **Traffic**

1. Trip generation calculations shall be submitted for the plan, so that it can be determined if a traffic study is required per SALDO, Section 1349.04(M).
2. It is recommended that the plan includes the installation of curbing along E. Walnut Street, and with depressed curb entrances and stop signs for each ingress/egress.

#### **Forestry**

1. Submit a landscape plan with compliance chart calculations and reference SALDO section 1349.19 and Zoning ordinance section 1319.02(j). See also Zoning Comment #6.
2. Note any trees that are to be removed or pruned within the public right of way shall require a street tree permit and licensed arborist.

#### **Electric**

1. The PPL utility poles and lines conflict with the proposed new structure. Provide a utility plan and indicate the proposed solution(s) for their relocation.

### **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.
2. All 'Fire Lanes' or "Fire Department Access Roads" must meet the applicable requirements of International Fire Code, 2018 ed., Section 503 and Appendix D.
3. 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.
4. The architect/engineer shall confirm Fire Department vehicles have the required turning space to access all areas. Contact the City of Bethlehem Fire Department for turning radius information for fire apparatus. Submit a turning plan drawing. See also Fire Comment #10.
5. A Knox Box for City of Bethlehem Fire Department access shall be installed. Add a note to the plans and indicate location TBD.
6. 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."
7. 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).
8. 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.
9. The plans that were submitted did not provide enough information to determine if the following item is applicable
  - a. 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.
  - b. If (a) is applicable, then a fire hydrant shall be required within 100' of the Fire Department Connection.
10. 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).
11. 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. Since only the dimensional requirements of the RT District apply to this project, other than front yard and height, Applicants shall revise the Dimensional Requirements Chart to reflect only the applicable requirements for each line item. Plans requiring zoning relief shall have two columns for dimensional criteria: 'Required' and 'Proposed', e.g., Tract Size: 9000 SF required, 27,597 SF proposed.
2. The proposed new building will exceed 35' in height. Dimensional criteria for side and rear setbacks shall reflect the requirements of Footnote f.
3. Merging the 52-54 E. Broad parcel with 60 E. Broad parcel would eliminate the need for side yard setback and lot width relief.
4. The Zoning Office consistently takes the position that when a use or building is expanded, and that expansion "increases the parking requirements according to the standards of Section 1319.01", then ZO Section 1319.02 mandates the overall parking needs to be updated to current requirements, including design requirements such as stall size and aisle width. Consequently, a Special Exception would be required to maintain the current parking 'as-is', and to reduce the overall required parking, if necessary, as authorized by 1319.02(b).
5. If the aforementioned relief is not granted by the Zoning Hearing Board, then the Applicants shall also comply with ZO 1319.03(h): *"In any parking area of five or more spaces in a Residential District or abutting a Residential District, all spaces not within a building shall be provided with a suitable mostly solid fence, architectural wall or evergreen planting at least four feet in height, designed to screen noise, odors, visibility and headlight glare, and located between such parking spaces and any lot in a Residential District that abuts directly or across a street."*
6. The plan shall locate all existing and required street and parking lot trees per 1319.02(j).

## **GENERAL**

1. A recreation fee of \$15,000 (\$1,500 x 10 dwellings) shall be paid at the time of execution of the developer's agreement.
2. Existing Site Plan, 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 42095C0307E, effective on 7/16/2014.
3. 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.
4. Provide a statement of intent on the plan.
5. 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. Vegetative roofs (aka green roofs) and/or planting boxes.
6. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
7. The Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
8. 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.