



# CITY OF BETHLEHEM

BUREAU OF PLANNING AND ZONING

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May 8, 2026

Chuck Fitzgerald



RE: **(26-001 Sketch Plan Review) – 26030007 – 2355 AVENUE A (ROYAL FARMS) – SKETCH PLAN REVIEW – Ward 13, Zoned CG, plans dated March 2026 (issued to client date March 11, 2026).**

Dear Mr. Fitzgerald,

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. Airport Road is a principal arterial within the City. The site is located along a significant northern gateway and is adjacent to the Lehigh Valley International Airport (LVIA), providing significant visibility for commuters and visitors to Bethlehem. The current proposal is for a prototypical development of a convenience store with gas pumps. While the use is permitted, the design does not (yet) consider urban design principles such as anchoring a corner, interaction between semi-public and semi-private spaces, accommodating alternative forms of transportation, pedestrian access to the convenience store and future development of the vacant lot, al fresco dining opportunities and overall site layout for an additional structure(s). Applicants are encouraged to relocate the convenience store closer to the intersection or reorient the primary façade to face Airport Road. The Applicants are encouraged to relocate the gas pumps to the rear of the convenience store or design the canopy to be a unique feature to the site.
2. The parcel is a corner lot with frontages on Avenue A and Airport Road. Both façades facing the street should have the appearance of a front façade. It is recommended, at minimum, that the north and west façades contain fenestration permitting visibility into and out of the store. Applicants are encouraged to design the building to appear as a two-story volume and avoid flat roofs.
3. Provide [sketch] architectural elevations or a rendered perspective and label exterior finishes (this item shall be submitted in paper or e-format prior to the Planning Commission Meeting).
4. Indicate how pedestrian access will be provided from Airport Road and Avenue A onto the site. Sidewalk shall be added along the full frontages of Airport Road and Avenue A. See also Miscellaneous Engineering, Comment #1.
5. Based upon previous submissions, it is the City's understanding that there is a cross-access easement for ingress/egress for the Pennsylvania State Police (PSP) onto Avenue A. Indicate if this easement remains in effect, and if so, identify how this will be incorporated into the design.
6. A set of plans shall be sent to Hanover Township for their review and comment.

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

**This plan will be placed on May 14, 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, 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
	Adam Herbold	Ryan Knause	Greg Cryder
	Cathy Fletcher	Olivia Teel	Mike Halbfoerster
	David Taylor		

Enclosure

## Additional Comments Related to the Overall Land Development

### **PUBLIC WORKS**

#### **Stormwater Engineering**

1. Plans shall include the existing and proposed square footage of impervious coverage on the site.
2. Submit a copy of the letter of approval from the Pennsylvania Department of Environmental Protection (PaDEP) for the National Pollutant Discharge Elimination System (NPDES) permit.
3. A stormwater management report shall be submitted to the City and Lehigh Valley Planning Commission (LVPC), as there will be greater than 10,000 SF of new impervious coverage. A copy of the LVPC review letter shall be submitted to the City.

#### **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 PaDEP.
2. Note that the previous iteration of development on this project was approved by PaDEP as a subdivision, thus the proposed flows were allocated across both lots. As this plan does not propose a subdivision, a new planning module shall be submitted to correct the previous submission.

#### **Miscellaneous Engineering**

1. Sidewalk shall be extended along the Airport Road frontage.
2. A Legal description of the proposed right-of-way (ROW) to be dedicated to the City shall be submitted for review. The developer will be responsible for preparing the necessary deed of dedication forms and recording at Lehigh County. This shall be included under Additional Special Provisions within the Developer's Agreement and recorded prior to the release of final security.
3. A sidewalk access easement agreement for all sidewalks outside the ROW shall be prepared by the developer and submitted to the City for review. This shall be included under Additional Special Provisions within the Developer's Agreement and recorded prior to the release of final security.
4. The final site plan shall show the locations of all utilities.
5. All curb ramps shall be designed and installed in accordance with Pennsylvania Department of Transportation (PaDOT) specifications. Details showing the design and slopes of each ramp shall be submitted to the City for review.
6. A full width mill and overlay is required within the limits of disturbance on Avenue A.

#### **Traffic**

1. Trip generation calculations shall be submitted for the plan, so it can be determined if a traffic study is required per SALDO, Section 1349.04(M).
2. The site proposes 2 right turn exit only driveways on Avenue A. Traffic that wishes to return to Airport Road will have to take Avenue B to Avenue C. This route is unclear and may lead to people taking left turns from the East driveway of the property. Provide reasoning on why these driveways are proposed as right turn only, and how illegal U-turns would be prevented on Avenue A.
3. The changes to Avenue A provide restrictions on the driveways for 2360 Avenue A and 2320 Avenue A. If the property owners agree, then their driveways will have to be converted to right turn only for entering and exiting with proper signage. This updated signage shall be shown on the plans.
4. Appropriate signage shall be shown on the plans for traffic restrictions for exiting the driveways.
5. Comments from Benchmark Engineering, the City's Traffic Engineer, are enclosed for your review and comments. Please make sure responses are provided for the letter when the revised plans are submitted.

#### **Electrical**

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

## **Forestry**

1. Submit a landscape plan including a compliance chart for landscape requirements.
2. Add a note to the plan, “Any public right of way tree work, including removal or pruning, shall require a licensed arborist and street tree permit.” Contact Olivia Teel, with any questions, details, or permit requirements at either: (O) 610.865.7073, or (E) [oteel@bethlehem-pa.gov](mailto:oteel@bethlehem-pa.gov).

## **ZONING**

1. No lighting, landscaping or buffering features are depicted; a Landscape and Lighting plan shall be submitted.
2. The depicted sign height and location have been generally reviewed, but this review shall not infer final comments or approvals of the area (size) or design of the sign.
3. Revise the zoning tables to express Building Coverage and Impervious Surface as percentages and include both required maximums and proposed totals.
4. Provide a specific parking calculation based upon the requirements of Zoning Ordinance section 1319.01 for all proposed uses. Include parking totals (for both automobiles and bicycles) expressed as ‘required minimum’ and ‘design provided.’
5. Locate, declare and dimension required front, rear and side yards.
6. Add a note to the plan, “This parcel is neither located in the Floodway nor Special Flood Hazard Area; Ref. FEMA FIRM 42095C0243E, effective on 7/16/2014.

## **GENERAL**

1. A Recreation Fee of \$2,798.50 (5,194 SF x .25¢ = \$1,298.50 + \$1,500) shall be paid at the time of execution of the developer’s agreement.
2. Provide a Statement of Intent on the Plan.
3. Provide a landscaping plan and account for the following:
  - a. 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 impervious surface. Ref. 1349.19(G).
  - b. 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. Ref. 1349.19(H)(1).
4. 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. 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, consist of native species and promote pollinators.
  - c. Direct stormwater from roof downspouts into suitable vegetative areas or include green roofs.
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.
7. Environment Advisory Council (EAC) comments will be included at the time of submission of Preliminary/Final Land Development Plans.
8. The Lehigh and Northampton Transportation Authority (LANTA) comments will be included at the time of submission of Preliminary/Final Land Development Plans. Previous submissions included a bus shelter replacement along Avenue A. LANTA comments included, “... LANTA is coordinating the best suitable location for the proposed bus stop improvements along the property frontage. This will include an accessible bus stop landing pad in between the proposed curb and sidewalk network on Avenue A...” Indicate if this remains part of the scope of work, and if so, then identify this location on the plan.
9. 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.
10. The project is on a parcel currently designated as eligible for Enterprise Zone (EZ) Tax Credit benefits. Eligible program activities include rehabilitation, expansion, improvement to a building(s), improvement to land, engineering, architecture, and acquisition. To discuss whether the project would qualify for a tax credit, please contact Sean Ziller, Deputy Director for Economic Development, 610.849.2142, or [sziller@bethlehem-pa.gov](mailto:sziller@bethlehem-pa.gov).