



# Lehigh Valley Planning Commission

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February 21, 2020

Darlene Heller, AICP  
Director of Planning and Zoning  
10 East Church Street  
Bethlehem, PA 18018

**RE: Zoning Map Amendment – RR to R-RC  
City of Bethlehem  
Northampton County**

Dear Ms. Heller:

The Lehigh Valley Planning Commission’s (LVPC) Comprehensive Planning Committee will consider the subject amendment at its meeting on February 25, 2020, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). The LVPC will issue a second letter on or after the Committee meeting should the Committee have any additional comments.

The proposed amendment changes the zoning of two parcels, located at 2105 Creek Road (PINs Q7 9 6 0204 and Q7 9 7 0204) from Rural Residential (RR) to Residential Retirement Complex (R-RC). This rezoning is generally inconsistent with the County Comprehensive Plan, *FutureLV: The Regional Plan*, because it is located entirely within a High Conservation Priority area of the Natural Resources Plan. High Conservation Priority areas are intended to be conserved, restored and enhanced in order to protect the character of the region.

The LVPC offers the following additional comments related to the proposed amendment in consideration of FutureLV:

**Environmental Impacts**

The subject properties are located entirely within the Federal Emergency Management Agency (FEMA) Flood Way and AE Flood Zone (100-Year Flood Zone), where the proposed zoning for age-restricted residential development does not ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (Policy 3.2). Development in the Flood Way and Flood Zone may also conflict with FEMA standards for critical facilities, those housing populations with limited mobility and others at-risk, as defined by FEMA.

### **Hazard Mitigation and Economic Vitality**

Location in the floodplain does not 'incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains' (Policy 5.1), as it facilitates the introduction of housing for a traditionally lower-mobility population which may increase hazards during future flooding events. Construction in the floodplain does not 'provide a wide variety of attainable housing in locations that maximize social and economic opportunities for everyone' (Policy 4.5), due to the propensity for these areas to experience flooding losses.

### **Emergency Response**

The LVPC encourages the City to further evaluate encumbrances on emergency personnel created by future development resulting from the proposed amendment. Emergency response efforts, directly or indirectly related to potential inclement weather events, may be hampered by the location of the subject property which does not 'enhance planning and emergency response efforts among emergency personnel' (Policy 5.1).

If you have any additional questions regarding the content of this letter, please do not hesitate to call. As a reminder, in accordance with MPC requirements, any ordinance amendments should be forwarded to the LVPC after official adoption. Thank you very much.

Sincerely,



Samantha Smith  
Chief Community Planner

cc: Robert G Vidoni, Esq., City Clerk  
Eric Evans, City Administrator