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January 20, 2021

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

**RE: Zoning Ordinance and Map Amendment – Student Housing and Student Home Overlay District
City of Bethlehem
Northampton County**

Dear Ms. Heller:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Both meetings are virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

- LVPC Comprehensive Planning Committee Meeting
 - January 26, 2021 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - January 28, 2021 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The proposed zoning ordinance and map amendment establishes a Student Housing and Student Home Overlay Zoning District (SH) to be applied in two areas adjacent to Lehigh University, revises dimensional requirements for the Residential Districts and Limited Commercial District, amends accessory structures regulations and amends the definitions section.

While components of the proposal are a matter of local concern, implementation of a student overlay district can have pivotal impacts on housing attainability in the City, or in the Region if applied at a broader scale. Student populations are generally more transient, and regulation of student housing can mitigate effects on the real estate market and housing attainability by reducing market competition for lower-cost rental housing. This supports increased stability for longer-term residents, and serves to

further the intent of *FutureLV: The Regional Plan* to 'promote mixed-income neighborhoods' (of Policy 4.5).

The LVPC's 2020 Equity Analysis indicates that the proposed SH Overlay Zoning District is located in an area that has low access to opportunity, characterized with high housing vacancy rates, high cost-burdening and low home ownership. The proposed overlay zoning district supports the stabilization of housing costs and opportunities in this area. The LVPC commends the application of 'context-specific design solutions' (of Policy 5.4) to address the unique needs of the City and Region.

In addition to regulations within the ordinance amendments that support long-term residents, the proposal also ensures that opportunities for student housing are provided in appropriate areas. This further supports the intent of *FutureLV* to 'provide a wide variety of attainable housing in locations that maximize social and economic opportunities for everyone' (Policy 4.5).

Municipalities, when considering ordinance amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC.

If you have any questions regarding the content of this letter, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jillian Seitz', written in a cursive style.

Jillian Seitz
Senior Community Planner

cc: Robert Vidoni, Esq., City Clerk