

April 23, 2021

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

**RE: Zoning Ordinance Amendment – OMU Zoning District Design Standards
(ADDITIONAL LVPC COMMENTS)
City of Bethlehem
Northampton County**

Dear Ms. Heller:

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion from those meetings has resulted in the following revisions to the review letter issued on April 7, 2021 to reflect the comments of the Commission members.

- LVPC Comprehensive Planning Committee Meeting
 - April 20, 2021 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - April 22, 2021 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The privately proposed zoning ordinance amendment refers specifically to a property located at 1170 8th Avenue, a key redevelopment site that is one of the most accessible locations in the region that poses significant impacts on the community character, identify and quality of life for both the City and Lehigh Valley.


The proposal is generally inconsistent with *FutureLV: The Regional Plan* because the presented amendments would result in suburban-scale development patterns that are not consistent with the character of the City or conducive to multimodal accessibility. Specifically, the proposal to allow additional parking between a building and arterial street does not 'promote context-specific design solutions' (of Policy 5.4) and would reduce safety and accessibility for pedestrians and transit users (of Policy 2.3). The LVPC strongly encourages reinvestment in this commercial area (of Policy 4.6) that is at a pedestrian scale (of Policy 1.2), in order for the future development to complement the unique history, environment, culture and needs of the Valley and City (Policy 5.4).

Although the amendments are intended for a specific site, the proposal would affect the entirety of the Office Mixed-Use (OMU) Zoning District, including any properties that may be zoned as OMU in the future. Amending the City Zoning Ordinance in the interest of a specific site and development does not align with best practices in planning (of Policy 1.4). Because the proposed amendment, if adopted would affect more than one property, and this zoning amendment proposal is directly related to a development proposed for a specific site, the LVPC recommends the developer seek a variance from the Bethlehem Zoning Hearing Board, where the Pennsylvania Municipalities Planning Code directs requests for relief. Following the legally-defined process for site-specific zoning issues supports 'an efficient development process that is responsive to regional needs' (Policy 1.4) without causing potential adverse effects to the entire zoning district and adjacent neighborhood.

Municipalities, when considering ordinance and map amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§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".

Jillian Seitz
Senior Community Planner

cc: Robert Vidoni, Esq., City Clerk
Judy Kelechava, Assistant City Clerk