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July 13, 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
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
 - July 20, 2021 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - July 22, 2021 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The proposed zoning ordinance amendment is a revised version of a privately proposed amendment the LVPC previously reviewed in a letter dated April 23, 2021. The ordinance amendment affects the Office Mixed Use (OMU) District at the former Martin Tower site (1170 8th Avenue), a key redevelopment opportunity that is one of the most accessible locations in the region and poses significant impacts on the community character, identity and quality of life, for both the City and Lehigh Valley.

Aspects of the proposal exhibit partial consistency with *FutureLV: The Regional Plan*. The revisions are an improvement over the previously proposed exemptions from regulations within the OMU Zoning District. However, the increase of allowable off-street parking (from

one driving aisle and one row of parking spaces to two driving aisles and four rows of parking spaces) would result in automobile-dependent development patterns at a suburban scale that are not the most conducive to multimodal accessibility. To further improve consistency with *FutureLV* and 'promote context-specific design solutions' (of Policy 5.4), the LVPC encourages reinvestment in this area at a pedestrian scale (of Policy 1.2). Reducing automobile dependency will increase the viability of the investment in the long-term, improve efficiency of the transportation system by reducing traffic congestion (Policy 2.1) and ultimately complement the unique history, environment, culture and needs of the Valley and City (Policy 5.4).

The proposed zoning ordinance amendments are specific to the circumstances of a particular property. In instances where a property owner is seeking relief from zoning ordinance requirements, the Pennsylvania Municipalities Planning code directs those requests to the zoning heard board, by obtaining a variance. Following the legally defined process for site-specific zoning issues better aligns with best practices in planning and development (of Policy 1.4).


When considering zoning ordinance amendments that may be broadly applicable, the LVPC recommends that the City consider vehicular, bicycle and pedestrian circulation within the subject zoning district, and its connectivity to adjacent developments and their zoning districts. These contextual considerations help to avoid transportation mode conflicts within the site and create a seamless mobility network when transitioning to adjacent neighborhoods, supporting 'an efficient development process that is responsive to regional needs' (Policy 1.4).

If the City chooses to move forward with a zoning ordinance amendment instead having the developer go through the standard zoning variance process, attention to vehicle, pedestrian, Americans with Disabilities Act (ADA) accessibility, transit and cycling coordination within the site and its external connections to surrounding neighborhoods will be critical. Considering transportation modes in totality ensures avoidance of safety and mobility conflicts and supports healthy and active lifestyles, mode equity (including transit connectivity), mitigates congestion and improves air quality. Car-centric development is not in keeping with current planning or community management practices for the equity, economic, safety, public health and environmental concerns stated above. City policy recognizes this, and we applaud the City for its adoption of a Vision Zero Policy (2016), with a target of no transportation related deaths by 2030, and for advancing climate action through the new Plan, both which support the *all mode transportation equity* approach. With City policy in place, we hope that implementation of zoning regulations supports the outcomes that are anticipated to be achieved.

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 [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. If these amendments move forward adoption, please send us a hard copy 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". The signature is fluid and cursive, with the first name "Jillian" written in a smaller, more compact script and the last name "Seitz" written in a larger, more prominent cursive style.

Jillian Seitz
Senior Community Planner

cc: Robert Vidoni, Esq., City Clerk