



## Lehigh Valley Planning Commission

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June 24, 2025

Tad J. Miller, City Clerk  
City of Bethlehem  
10 East Church Street  
Bethlehem, Pennsylvania 18018

**RE: Subdivision and Land Development Ordinance – Comprehensive Update  
City of Bethlehem  
Lehigh County and Northampton County**

Dear Mr. Miller:

The Lehigh Valley Planning Commission (LVPC) will consider the proposed comprehensive update of the City of Bethlehem's Subdivision and Land Development Ordinance at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on items largely happens during the Committee meeting, and community participation is welcome and encouraged. The LVPC will send a follow-up letter if the Commissioners have any additional comments. The meetings are held on:

- LVPC Comprehensive Planning Committee Meeting
  - June 24, 2025, at 12:00 PM
  - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
  - June 26, 2025, at 7:00 PM
  - <https://lvpc.org/lvpc-meetings>

The application proposes a comprehensive update to the City of Bethlehem Subdivision and Land Development Ordinance (SALDO). The purpose of the proposed SALDO, as specified in Article 1341.03, is to 'create conditions favorable to the health, safety, and general welfare of the citizens'.

### Administration

The General Procedures of the proposed Ordinance (Article 1343) align with the Pennsylvania Municipalities Planning Code (MPC), which grants powers to municipalities to regulate subdivision and land development and outlines the contents of subdivision and land development ordinances (MPC Article V). The proposed definitions for 'Land Development' and 'Subdivision' are written to align with the definitions provided in the MPC and are best practices in managing varieties of development (*FutureLV: The Regional Plan*, of Policy 1.4). The ordinance also includes a separate definition for "Development", which the LVPC recommends removing or clarifying to eliminate conflicts, redundancies and the possibility of confusion for applicants.

The LVPC recommends adding definitions for "On-Lot Sewage Disposal Systems", "Sewage Enforcement Officer" and "Sewage" to further increase ordinance usability and clarity.

## **Plan Review Procedures / Applications**

The LVPC commends the City for incorporating the LVPC in sketch plan review procedures (Article 1344.03) which ensures projects receive a regional perspective early in the planning process, helps 'coordinate land use decisions across municipal boundaries' and enables the LVPC to better support the City through discussions or negotiations with the developer and (of Policy 1.4).

The proposed ordinance outlines plan submission procedures for preliminary and final 'Major Subdivisions and Land Developments' (Article 1345) with separate simplified requirements and review procedures for 'Minor Subdivisions, Land Developments and Lot Line Adjustments' (Article 1346). Section 1345.02.E.1. (Review by Planning & Zoning Bureau) specifies that 'the applicant is responsible for submission to LVPC at the same time as City submission'. The LVPC strongly recommends this statement be included within Article 1346 as well, to ensure that all submissions align with plan review procedures and timeframes outline in the MPC. While Article 1346 references LVPC review, providing the same procedural language will improve clarity for ordinance users navigating the submission process.

The LVPC commends the inclusion of a Plan Submission Checklist (Appendix B) which is a best practice that helps streamline the submission process for applicants and the plan intake process for the City (of *FutureLV* Policy 1.4).

The LVPC recommends including procedures for emergency service providers in the plan review process to provide opportunities for comment and to 'enhance planning and emergency response efforts among emergency management personnel' (of Policy 5.1).

## **Design Standards**

Article 1349 of the proposed Ordinance identifies design standards that provide a basis of the City's considerations that ensure proposals promote public health, safety and welfare through the review process (of Policy 3.2). The Ordinance includes cross-references to the City's zoning ordinance requirements, which supports users in navigating both ordinances and encourages an efficient development process (of Policy 1.4).

## **Transportation**

Article 1349.15 of the proposed Ordinance supports the intent of *FutureLV* to 'establish mixed-transportation corridors' and enhances walk/roll facilities along Corridors (of Policies 2.1 and 2.3). The inclusion of required Americans with Disabilities Act compliant sidewalks and pathway assists people of all abilities and provide alternative transportation options (of Policy 2.3).

The proposed Ordinance provisions also serve to 'maintain and enhance existing transportation infrastructure' (of *FutureLV* Policy 2.6) and promote an interconnected street network (of *FutureLV* Policy 2.2). The LVPC commends the requirements for Transportation Impact Studies (Section 1349.04.M) which serve to 'improve the efficiency of infrastructure and avoid traffic incidents' (of *FutureLV* Policy 2.2).

## **Environment**

The proposed ordinance includes provisions for Green Stormwater Design standards (Section 1349.8.c) and directs applicants to consider opportunities to incorporate planting and infiltration areas along street rights-of-way, such as tree trenches under street trees and plantings for bulb-out curb extensions. The proposed Streets design criteria also strongly encourages applicants to consider porous surfaces or suitable alternative surfaces that allow infiltration (Section 1349.04.K.15). These green infrastructure considerations help minimize environmental impacts

of development and protect the quality and quantity of surface water and groundwater (of *FutureLV* Policy 3.2).

Bethlehem has established a Bureau of Urban Forestry within its Public Works Department and has a City Forester on staff. Species selection is subject to approval by the City Forester or other designated City staff. Additionally, Bethlehem has a Shade Tree Ordinance (Article 910) which covers aspects of permitting, tree protection, maintenance, and responsibilities of both the city and private property landowners. The City also provides numerous technical and guidance documents including clear and detailed landscape plan requirements, tree resources, guidance in choosing and planting trees – including an approved list of tree species. These activities ‘conserve and manage natural lands and water resources for environmental and recreational benefits’ of Policy 3.1 of *FutureLV: The Regional Plan* as well as support environmental conservation strategies outlined in the City’s 2008 Comprehensive Plan and community wide objectives described its 2021 Climate Action Plan.

Overall, the City’s updated Subdivision and Land Development Ordinance is clear, concise, and supports current-day best practices for regulating subdivision and land development design and submission processes.

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 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, please do not hesitate to call.

Sincerely,



Jillian Seitz  
Chief Community Planner

Susan Myerov



Director of Environmental Planning

CC: Cathy Fletcher, Director of Planning and Zoning; Craig Peiffer, Assistant Director of Planning and Zoning.