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## Community Health Improvement Plan (CHIP) - Allentown

### Contextual Analysis: The Allentown Public Health Landscape

To ensure the long-term prosperity of Allentown, municipal policy must pivot from traditional economic development toward a strategic alignment with the Social Determinants of Health (SDOH). While the Lehigh Valley is experiencing an economic resurgence, Allentown remains burdened by persistent economic distress, evidenced by a 23.3% poverty rate and a prime-age employment gap of 6.1%. Our strategic assessment dictates that to mitigate this gap, we must address the environmental conditions where residents live and work. The following Community Profile identifies the socioeconomic disparities across the four Police Service Areas (PSAs) that necessitate localized interventions.

Metric	PSA I: East Side	PSA II: West End	PSA III: South Side	PSA IV: Center City
Total Population	16,851	43,415	31,433	16,105
Median Household Income	\$47,932	\$52,238	\$51,676	\$34,912
No Health Insurance (%)	14.8%	12%	20%	29%
Hispanic/Latino (%)	45.1%	45.1%	55.1%	67%



The differentiation between PSA IV (Center City) and PSA II (West End) is stark, particularly regarding educational attainment and language barriers. In the West End, 33.6% of residents hold a bachelor's degree or higher, compared to just 11.1% in Center City. Furthermore, residents who do not speak English at home—a demographic heavily concentrated in PSA IV—are over three times less likely to graduate from high school. These disparities significantly impede "Upward Economic Mobility," a stated priority of the Community Health Assessment Leadership Team (CHALT), as higher-paying local jobs remain inaccessible to a large segment of the urban core. To address these demographic realities, the City must deploy policy interventions tailored to the specific needs of its most vulnerable neighborhoods.

### Strategic Priority I: Upward Economic Mobility & Food Access

With an adult obesity rate of 44.7% and significant food insecurity in Center City (PSA IV), mobile vending offers an agile solution to bridge the gap between "food deserts" and nutritious food access. Current city regulations (Chapter 626) prioritize sanitation and distance but lack nutritional guidance. This proposal recommends a two-tiered licensing system modeled after the NYC "Green Cart" program and Philadelphia's Nutrition Standards to incentivize the sale of fresh produce and healthy meals without penalizing existing small businesses.

Allentown's dense urban core is characterized by a high concentration of fast-food options and limited access to fresh produce—a "food swamp" environment.

- **The Opportunity:** Mobile vendors are uniquely positioned to penetrate these neighborhoods. However, current regulations prohibit them from operating within 100 yards of schools, inadvertently blocking potential avenues for healthy food delivery to youth.
- **The Goal:** Transform the mobile fleet from a source of calorie-dense, low-nutrient food into a distribution network for health, leveraging the 80% profitability rate seen in similar fresh-food vending pilots.

#### Legislative Mechanism: The "Healthy Choice"

To operationalize this strategy, the City Council must amend **Chapter 626 (Vendors on Streets and Sidewalk Areas)** to establish a voluntary "Healthy Choice" permitting tier. This creates a "carrot, not stick" approach.

#### A. The "Green Cart" (Produce Only)

- **Definition:** Mobile units selling *exclusively* whole, uncut raw fruits and vegetables, plain nuts, and water.
- **Current Regulatory Foundation:** Allentown's current code already acknowledges this category by exempting carts selling "whole, uncut produce" from certain enclosure requirements.
- **Strategic Incentive:**



- **Fee Waiver:** Waive the \$50 application fee and the \$250 annual license fee for these specific vendors.
- **Zoning Exemptions:** Amend Section 626.04 to allow Green Carts to operate within the 100-yard school buffer zone, providing healthy snacks to students.

## B. The "Healthy Choice Vendor" (Prepared Foods & Food Trucks)

- **Definition:** Food trucks where at least 50% of adult meal options and 100% of children's options meet the *Allentown Nutritional Standards* (detailed below).
- **Strategic Incentive:**
  - **Prime Location Access:** Designate "Healthy Vending Zones" in high-traffic areas (e.g., near PPL Center, Arts Walk) currently restricted or capped.
  - **Expedited Permitting:** Prioritize plan reviews for these vendors through the Health Bureau to reduce the 4-6 week lead time.

### Operational Standards: Adopting Evidence-Based Nutrition

To qualify for the "Healthy Choice" tier, vendors must adhere to specific nutritional criteria during the Health Bureau's Plan Review process. These standards are adapted from the **Philadelphia Nutrition Standards** and the **Blue Zones Nutrition Guidelines**:

#### 1. Elimination of Industrial Fats

- **Standard:** All food items must contain **0 grams of trans fat** and the ingredient list must not contain "partially hydrogenated oils".
- **Preparation:** No deep-frying is permitted on the unit. Vendors must utilize baking, grilling, or steaming.

#### 2. Sodium and Sugar Reduction

- **Sodium Cap:** Purchased food products and prepared entrees must not exceed **480 mg of sodium** per serving.
- **Beverage Standard:** To combat diabetes and obesity, "Healthy Choice" vendors may not sell sugar-sweetened beverages (soda, fruit punch). Permitted beverages (water, seltzer, unflavored milk) must contain **≤ 40 calories per container**.

#### 3. Whole Ingredient Requirement

- **Grains:** Sliced breads and wraps must be "Whole Grain Rich" (50% or more whole grain content).
- **Menu Mix:** Menus must offer at least one vegetarian or plant-based entrée.

### Economic Viability and Support

Critics often argue that healthy food policies hurt small businesses. However, data from the NYC Green Cart initiative demonstrates that **80% of vendors found the business model profitable**, and 75% viewed it as a pathway to opening a larger business.



- **Minimizing Risk:** By using a voluntary incentive model rather than a blanket mandate, the city avoids imposing costs on existing "traditional" food trucks.
- **Technical Assistance:** The Health Bureau, in partnership with the Blue Zones Project, will provide technical assistance on menu redevelopment and sourcing local produce, potentially utilizing the proposed "Food Hub" for wholesale cost reduction.
- **Marketing Support:** "Healthy Choice" vendors will receive specific decals and branding (e.g., "Blue Zones Approved" umbrellas), helping them stand out in a crowded market.

## Strategic Priority II: Tobacco-Free Recreational Spaces ("Young Lungs at Play!")

While the Commonwealth of Pennsylvania preempts local municipalities from banning the sale of tobacco products or altering the legal age of purchase, Allentown retains significant "Home Rule" authority to regulate the **location, density, and marketing** of these products. The recently adopted Zoning Ordinance (Chapter 660), effective January 1, 2026, provides a powerful, legally defensible framework to exercise this authority. This proposal outlines how to operationalize the specific provisions included in the update to reduce youth exposure without triggering preemption challenges.

### The Legal Landscape: What We Can vs. Cannot Do

To navigate preemption successfully, the Council must distinguish between regulating the *product* (State authority) and regulating the *commercial environment* (City authority).

- **Preempted (State Authority):** We cannot ban specific products (e.g., flavored vapes), raise the sales age to 21, or enact indoor smoking bans that exceed the Clean Indoor Air Act exceptions (e.g., in cigar bars).
- **Permitted (City Authority):** We *can* regulate where businesses locate (Zoning), how they display signage (Time, Place, Manner), how many licenses exist (Density Caps), and tobacco use on city-owned outdoor property (Parks) .

### Leveraging the Current Zoning Update (Chapter 660)

The new Zoning Ordinance includes specific tools that, if strictly enforced and slightly expanded, effectively bypass preemption by managing land use rather than sales.

### Leveraging Advertising Buffers (Section 660-107)

- **What is Included:** Section 660-107.B prohibits the placement of tobacco advertising in publicly visible locations within **300 feet** of schools, playgrounds, and youth centers .
- **Strategic Navigation:** While federal law (FCLAA) preempts bans on advertising content, it allows "Time, Place, and Manner" restrictions. The 300-foot buffer is a "Place" restriction. To strengthen



this against legal challenge, the Council should document the "substantial government interest" (reducing youth initiation) that justifies this zoning restriction .

#### **A. Proposed Procedural Enhancements to the Zoning Code**

To maximize the impact of the 2026 update, we propose the following actionable amendments that complement the new text:

##### **The "Window Coverage" Ordinance (Content-Neutral)**

- **The Gap:** While Section 660-107 limits tobacco ads specifically, tobacco companies often challenge such "content-based" rules under the First Amendment.
- **The Solution:** Adopt a **content-neutral** provision within Article 10 of the Zoning Code that limits *all* window signage to a maximum of **25%** of the window area, regardless of what is being advertised.
- **Benefit:** This eliminates the "power wall" of neon tobacco signs facing the street without singling out tobacco, making it immune to preemption or First Amendment claims while improving safety and visibility .

#### **B. Complementary Operational Strategies (Non-Zoning)**

While Zoning handles *location*, the following items address *operations* to further navigate preemption:

##### **Licensing: The "Cap and Winnow" Strategy**

- **Concept:** While we cannot ban sales, we can cap the number of business licenses.
- **Action:** Implement a local Tobacco Retailer License (TRL) with a "Cap and Winnow" provision. This sets a maximum number of licenses per district (e.g., PSA IV). As current retailers close, their licenses are retired until the cap is reached. This reduces density over time without harming current business owners .

##### **Outdoor Air: Codifying "Young Lungs at Play"**

- **Concept:** State preemption largely applies to indoor air. The city has full authority over its own outdoor property.
- **Action:** Codify the "Young Lungs at Play" initiative into a municipal ordinance (Chapter 425), making all city parks and playgrounds 100% smoke-free. This moves the policy from voluntary compliance to enforceable law .



## Conclusion

The **Recently Approved Zoning Code** acts as a catalyst for the Green Carts initiative. By leveraging new high-density categories in PSA IV, the City can provide the "legal opening" and financial incentives necessary for mobile vendors to thrive where traditional supermarkets have failed.

### Critical Strategic Takeaways:

1. **Prioritize Upward Economic Mobility:** Lowering barriers to entry through Green Carts addresses the prime-age employment gap for residents with limited education or language proficiency.
2. **Optimize the Built Environment:** Strategic focus on Center City food access and tobacco-free recreational spaces directly mitigates geographic disparities in "access to opportunity."
3. **Combat Social Isolation through "Third Places":** Enhancing the safety and health profiles of public parks and vending areas creates the high-quality "Third Places" needed to foster community connection and reduce social isolation.



#### Robert Almonte

Policy Lead

Blue Zones Project Allentown

We empower everyone, everywhere to live better longer.

 [robert@bluezones.com](mailto:robert@bluezones.com)

 +14842396790  
Cell

