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Executive Director

November 24, 2021

Mr. Michael P. Hanlon
Allentown City Clerk
435 Hamilton Street
Allentown, PA 18101

**RE: Zoning Map Amendment – 1837 West Linden Street
Medium Density Residential (R-M) to Highway Business District (B-3)
City of Allentown
Lehigh County**

Dear Mr. Hanlon:

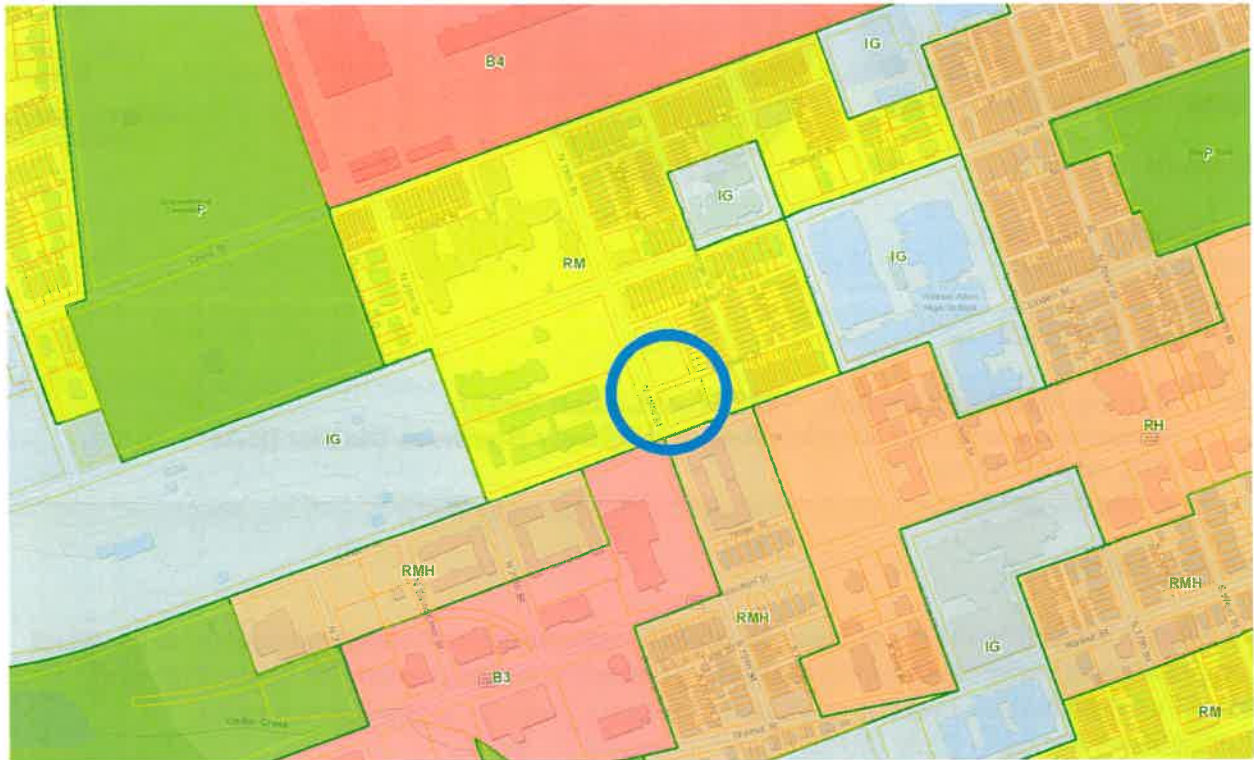
The Lehigh Valley Planning Commission (LVPC) considered the subject application at its virtual Comprehensive Planning Committee meeting and will consider the subject application at its virtual Full Commission meeting, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Meeting details are below:

- LVPC Comprehensive Planning Committee Meeting
 - November 16, 2021 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - November 18, 2021 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The subject application proposes to rezone a property located at 1837 West Linden Street, currently zoned Medium Density Residential (R-M) Zoning District to Highway Business (B-3) Zoning District.

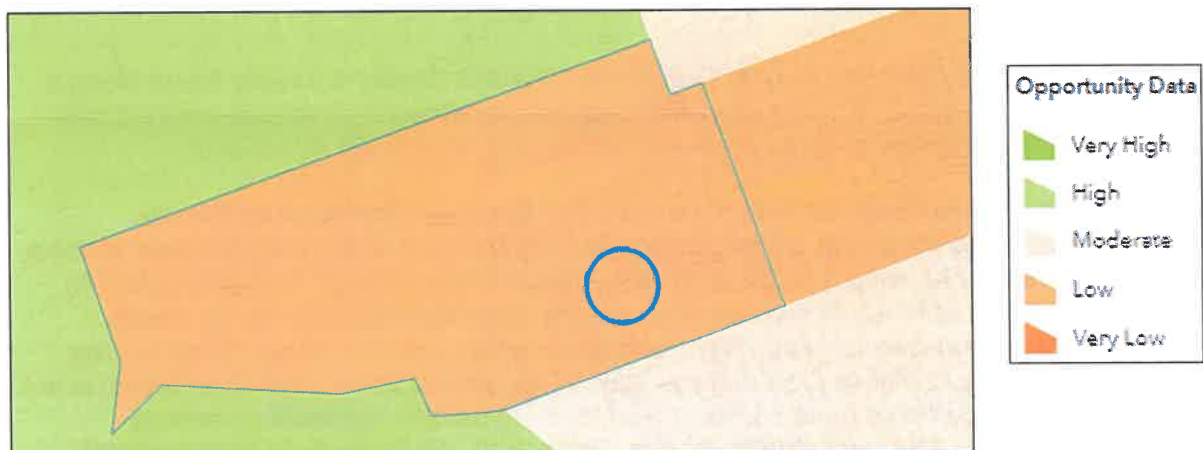
According to the City of Allentown Zoning Ordinance, 'The B-3 District is usually found along a City arterial street. The purpose of the district is to provide locations for highway oriented and other retail uses and services for large areas of the City and beyond (§1309.06 K.)'.

The proposal exhibits inconsistency with *FutureLV: The Regional Plan* because the site proposed for rezoning is located in a highly walkable neighborhood of the City and near schools of various levels, senior housing, Lehigh and Northampton Transportation Authority (LANTA) bus stops, public parks and health care services among other essential community needs. Additionally, the site proposed for rezoning is located on a City collector street. Continuously expanding the Highway Business District away from a City arterial street (Hamilton Street) is not recommended for supporting a more compact development pattern, optimizing roadway capacity or encouraging alternative travel options (Policy 2.1). While the B-3 District permits uses that may be suitable for the subject property, rezoning this property to Highway Business District will most likely result in automobile-oriented development that is unsuitable to the context of the area and needs of nearby residents (of Policy 1.2).



City of Allentown Zoning Map

The LVPC's Equity and Access to Opportunity Assessment indicates that the subject property is located in an area with low access to opportunity, characterized by residents that are largely renters (75%), nearly half of which spend more than is recommended on housing costs (46%) and over one-quarter do not have access to a car (26%). Encouraging development that is integrated into the community is crucial to supporting the long-term sustainability of Allentown's neighborhoods and 'increasing social and economic access to daily needs for all people' (Policy 5.2).



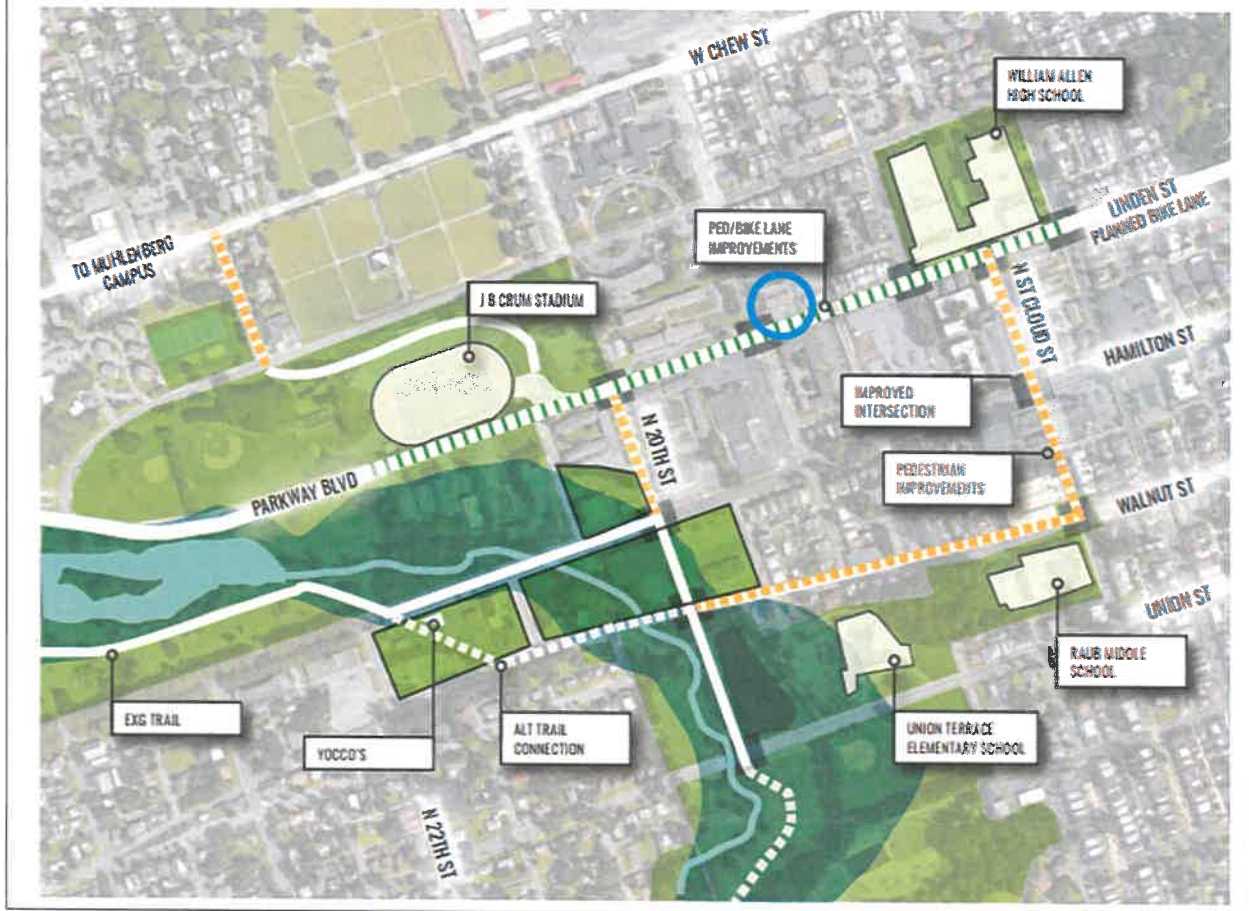
LVPC Equity Analysis

Additionally, this proposal is not consistent with the long-term vision outlined in the City's Comprehensive Plan, *Allentown Vision 2030 Plan* for this area:

WEST ALLENTOWN TOMORROW

The area will be known for programs that support innovation in education, medicine, and the arts.

New businesses and residences are woven into the neighborhood fabric with safe, walkable, and bikeable connections and a greenspace network.



Allentown Vision 2030 Plan (page 224)

The LVPC is supportive of 'reuse and redevelopment within urban areas' (of Policy 1.1) so long as they complement the unique history, environment, culture and needs of the surrounding community (of Policy 5.4). If the property owner desires to redevelop the site for a use not permitted in the current Medium Density Residential Zoning District, other legal mechanisms exist for 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). The LVPC strongly recommends that any zoning change approved by the City consider the context and lasting impact of that district and

its permitted uses in any given location, because once a property is rezoned the permitted uses apply regardless of the original intent of the rezoning (of Policy 4.6).

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 that reads "Julie Benco". The signature is written in a cursive, flowing style.

Julie Benco
Regional Planner

cc: Irene Woodward, City of Allentown Director of Planning & Zoning
Jesse Sadiua, City of Allentown Senior Planner