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November XX, 2023

Michael Hanlon, City Clerk
Allentown City
435 West Hamilton Street
Allentown, PA 18101

**RE: Zoning Map and Ordinance Amendment – Bill 93, Mixed-Use Overlay District,
Allentown State Hospital Site
Allentown City
Lehigh County**

Dear Mr. Hanlon:

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
 - November 14, 2023 at 12:00 PM
 - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
 - November 16, 2023 at 7:00 PM
 - <https://lvpc.org/meetings.html>

The subject zoning ordinance amendment proposes the establishment of a new “mixed-use overlay” (MUO) zoning district for the area in East Allentown that was previously occupied by the Allentown State Hospital. “The MUO District is intended to serve the purposes provided for in the Pennsylvania Municipalities Planning Code (MPC) for Planned Residential Developments (PRDs) and for Traditional Neighborhood Developments (TNDs); to promote a coordinated mix of residential, business, institutional, recreational, and open space uses in a manner that is pedestrian friendly, transit friendly and bicycle friendly; to widen housing opportunities in the City, particularly for housing types that are in high demand; to be designed to properly relate to existing adjacent neighborhoods, and to include a system of preserved open lands and trails, including preserved Open Lands that are integrated with residential areas.” This guides the location and intensity of development” and “encourages reuse and redevelopment within urban areas. (of *Future LV Policy 1.1*)

The 195 acres that make up the Allentown State Hospital Site have long been vacant and are located between Hanover Avenue and River Drive in the Rittersville neighborhood of East Allentown, near the border with Bethlehem. The Hospital, which was opened in 1912, was one of seven psychiatric hospitals within Pennsylvania, and served thousands of patients from around the region. At its peak, the hospital had over 2,000 patients and 300 employees. Due to

the changing nature of psychiatric healthcare, the hospital's population waned over the years, and was closed in 2010 and demolished in 2020. This MUO is in response to redevelopment efforts. The expansive site is one of the largest non-greenfield areas for residential redevelopment within the city or region. While redevelopments such as this support the preservation of agricultural and natural lands (of *Policy 1.1*), the size of the project demands careful planning to ensure effective and efficient land use. LVPC estimates that an additional 100,000 people will live in the Lehigh Valley by 2050 and we need to ensure that large-scale redevelopments such as this help to alleviate the discrepancy between supply and demand. While the scale of the neighborhood is important and has been well received by those who developed the ordinance, we must be mindful of the danger of under-developing a massive site such as this. As government agencies, we must do our part to help ensure a supply of quality and affordable homes and undersupplying will ensure that current housing trends will continue, with increasing prices as competition continues.

Lehigh County is facing a widening gap between housing costs and wages. A recent report completed by PolicyLink and Community Legal Services of Philadelphia states that since 2020, Lehigh County rents have increased by 17%. Much of this is due to supply and demand, as the housing stock cannot keep up with the demand of potential residents. There are only so many places for 100,000 more people to live in the Lehigh Valley, and we need to ensure that developments that do not interrupt open space or greenfields do their best to meet that demand to the greatest extent possible, which supports the preservation of farmland (*Policy 3.3*). While the resulting intensity of development should match that of neighboring properties, as well as that planned as part of the city's Vision 2030, we also need to strive to produce housing to keep prices affordable. Without additional residential unit development, prices will go up, and people will be forced out. The same report states that Lehigh County has one of the highest rates of evictions in the state. Part of that is due to the struggle renters have keeping up with rising rental rates, but it is also due to landlord expectations that they will easily find another renter.

While the LVPC recognizes the need for housing, we also understand the community need for open space, recreation areas and trail development, and we commend the city for including these priorities. The struggle to balance green areas and developed areas leads to one conclusion: "increase density of residential and mixed-use development in Centers" (of *Policy 1.2*).

A site such as this lends itself to creative ways to ensure density while also preserving neighborhood character. Mercantile style commercial buildings should be of 2-4 stories and should include residential units above. Strategic placement of taller buildings while limiting viewshed interruptions should be explored. Density will allow the city to ensure an adequate supply of homes while also restricting development in sensitive areas such as steep slopes. The sloped areas along River Road for example could be retained as an East Allentown "Parkway" area within the city, much like the Lehigh Parkway is for South Allentown.

Neighborhood character should be considered when developing the plans for the site. The street network should be connected to the greater municipal network to create an "efficient and coordinated development pattern (*Goal 1*). The City and developers should work with the Lehigh and Northampton Transportation Authority (LANTA) to ensure that appropriate transit infrastructure be developed as part of ongoing planning, which helps to "establish mixed-transportation corridors" (of *Policy 2.1*) and "link growing job and population Centers (of *Policy 2.3*). Concerns with neighborhood character should not be limited by the style of development. This neighborhood has much potential, and amenities that could be added to the neighborhood, such as a grocery or market should be explored. This site was also long utilized for healthcare and healthcare use should be explored as this neighborhood lacks close access to many of

those resources. These elements would not only help to improve the neighborhood but would also ensure that the development is successful. The amendment demonstrates ‘the evolution and adaptability of government’ (of Policy 1.1) by matching zoning districts to adopted plans, as well as appropriate future uses. The amendment also, ‘directs growth by establishing a network of mixed-use Centers’ (of Policy 1.2) and will ‘revitalize historic Centers’ (of Policy 5.3).

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,



Steve Neratko
Chief Community Planner

cc: Matt Tuerk, Mayor; Vicky Kistler, Community and Economic Development Director;
Jennifer Gomez, Planning Director; Dennis M. McCarthy, Esq., Davison & McCarthy