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September 2, 2025

Jennifer Gomez, AICP, Director of Planning & Zoning City of Allentown 435 Hamilton Street Allentown, PA 18101

RE: Comprehensive Subdivision and Land Development Ordinance Update City of Allentown Lehigh County

Dear Ms. Gomez:

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 will be virtual, and we encourage your participation.

- LVPC Comprehensive Planning Committee Meeting
 - August 26, 2025, at 12:00 PM
 - o https://lvpc.org/lvpc-meetings
- LVPC Full Commission Meeting
 - August 28, 2025, at 7:00 PM
 - https://lvpc.org/lvpc-meetings

The application proposes a comprehensive update to the City of Allentown Subdivision and Land Development Ordinance (SALDO), in tandem with its Zoning Ordinance Update. The purpose of the proposed SALDO, as specified in Section 350-1.E, includes 'guiding for future growth and development of the City in accordance with the Official Comprehensive Plan'.

Administration and Review Processes

The General Provisions of the proposed Ordinance align with Article V of 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. The proposed definitions for 'Land Development' and 'Subdivision' are written to align with definitions provided in the MPC and are best practices in managing development (of *FutureLV* Policy 1.4).

Article 5 of the proposed ordinance, which outlines Procedures of plan submittal and review, supports transparency in the process of subdivision and land development application and review. Colorized flow charts are included for each submission type and phase, which helps users better understand how to navigate the plan submission process. Including LVPC in the sketch plan review process enables LVPC to support the City earlier in the review process and 'encourages an efficient development process that is responsive to regional needs' (of *FutureLV* Policy 1.4).

Additional review entities such as the Lehigh and Northampton Transportation Authority (LANTA) are included in the review process, and review by other official bodies may be needed as determined by the City Planning Director. Ensuring regular opportunities for City emergency response departments to review and comment on applications is critical to 'enhance planning and emergency response efforts among emergency management personnel' (of *FutureLV* Policy 5.1).

Throughout the proposed SALDO are cross-references to the City's Zoning Ordinance and Comprehensive Plan, supporting cohesion between regulatory documents and is a best practice in local governance (of *FutureLV* Policy 1.4).

Transportation

The proposal includes a Complete Streets section that directs applicants to consider pedestrian, bicycle and transit facilities, which supports 'reducing bicycle and pedestrian fatalities towards zero' (of *FutureLV* Policy 5.1), 'promotes safe routes to schools and playgrounds' and 'integrates mixed-transportation into public space design' (of *FutureLV* Policy 5.2).

Requirements for traffic impact studies and transportation impact assessments are also included, which support 'improving transportation performance measures' and 'adjusting transportation projects to meet changing needs of the region' (of *FutureLV* Policy 2.6).

Environment

Street trees and streetscape requirements are incorporated into the proposed ordinance, directly supporting an action in *FutureLV* that supports creating community spaces that promote physical and mental health (of Policy 5.3).

The proposed ordinance requires land developments to address trails that are identified in an adopted trails plan, including the Jordan Creek Greenway Plan, Delaware and Lehigh Trail Plan, and others, which 'connects trails to centers, corridors and historic assets' (of *FutureLV* Policies 4.4, 5.3, 2.1 and 2.2).

The ordinance includes a requirement that new properties with on-lot sewage disposal facilities must have an on-lot system instruction manual provided to the new owners of the property, which 'provides for environmentally responsible waste disposal' (of *FutureLV* Policy 3.2).

Overall, the City's proposed SALDO reflects a clear effort to ensure consistency with its Comprehensive Plan and alignment its Draft Zoning Ordinance, creating a coordinated framework to guide growth and development. By aligning subdivision and design standards with broader land use policies and zoning regulations, the City is advancing a more seamless, transparent, and intentional approach to planning. This integration between regulatory documents strengthens the ability of the proposed ordinance to support *FutureLV: The Regional Plan*'s goals for livability, sustainability, and multimodal accessibility.

Municipalities, when considering ordinance updates, 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 feel free to reach out if you have any questions.

Sincerely,

Jillian Seitz

Chief Community Planner

Sin Show

Susan Myerov

Director of Environmental Planning

Evan Gardi

Transportation Planner

cc: Melissa Velez, City of Allentown Senior Planner; Jesse Sadiua, City of Allentown Chief Planner; Brandon Jones, City of Allentown Planner; Trevor Tormann, City of Allentown Senior Planner