



Allentown Environmental Advisory Council

Kyle Ropski, *Chair*
Tinku Khanwalker, *Co-chair*
Maria Ocasio, *Past chair*
Craig Beavers
Peter Dent
Brandon Swayser
atowneac@gmail.com

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Allentown City Council
City of Allentown
435 Hamilton Street
Allentown, PA 18101

Re: ZONE Allentown Recommendation

Dear Members of the Allentown City Council:

The Allentown Environmental Advisory Council (AEAC) wishes to provide our recommendation for the adoption of the new Zoning Ordinance, the new Zoning Map, and the new Subdivision and Land Development Ordinance (SALDO). The AEAC's mission is to advise on environmental issues within the City, encourage sustainable design and the reduction of greenhouse gas emissions, protect and preserve natural resources, and promote the use of open land for environmentally beneficial purposes. In arriving at our recommendation, we have identified several areas that will align with and advance these goals, as well as those of the City.

1. Promoting Form-Based Regulations and Mixed-Use Development

The AEAC applauds the City's efforts to support walkable, mixed-use developments through the creation of this new form-based code. This type of zoning ordinance focuses on the relationship of physical form to the public realm, rather than solely focusing on separating uses or specific area calculations. The City's new ordinances will now serve to preserve existing structures, promote people-oriented design, and support walkable and sustainable development throughout the city. Additionally, we support the City's proposal to allow for additional building height in mixed-use corridors in exchange for affordable housing. These additions promote the AEAC's goals of reducing emissions while promoting sustainable design solutions.

2. Strengthening Green Infrastructure Requirements

The new ordinances provide new and improved requirements for including green infrastructure throughout the documents, supporting new sustainable design measures. These include:

- Encouraging raingardens, bioswales, permeable pavements, green roofs, and other green infrastructure in all new developments, incentivized through the City's Stormwater Fee Credit Program.
- Allowing terraces, green roofs, rooftop gardens, and other pervious roof types on all rooftops in the City.
- Requiring compliance with site design regulations for new developments, building expansions, additional site elements, adaptive reuse, expansion of parking, and expansion of outdoor storage and trucking terminals.
- Ensuring all landscaping is installed and maintained with best management practices and context-sensitive measures.
- Naturalizing parking lots and other impervious areas adjacent to roadways with landscape buffers, as well as requiring various buffer types for other property types.
- Requiring/highly recommending the exclusive use of plant species native to Pennsylvania in all new plant installations.

3. Enhancing Protection of Natural Resources

Expanding upon existing protections, the new ordinances include several regulations that will conserve and protect natural resources throughout the City. This supports the AEAC's mission and goals for guarding open space and environmentally sensitive features across the city. These provisions include:

- Protecting natural spaces and parkland through required parkland dedication or fees-in-lieu of
- Sensitive environmental areas, such as steep slopes, floodplains, or valuable tree canopies, are given additional protection under the new ordinances, allowing for relocation of specific building zones and requiring additional review and study.
- New regulations also provide protection of street trees, waterways and waterfronts, streetscape corridors, and other natural features.
- Requiring protection of existing, significant trees for all master-planned developments, heavily wooded sites, large parcels, or sites next to waterways.
- Providing for appropriate ground vegetation, planting beds, and natural, alternative, or native species meadow lawns on all unpaved spaces.
- Protecting steep slopes on projects that would trigger any erosion and sedimentation control plan requirements.
- Maintaining performance standards, such as air quality, noise and vibration, and light and glare regulations.

4. Expanding Sustainable Transportation Options

To support the AEAC's goal of reducing greenhouse gas emissions, the new ordinances include numerous provisions that encourage reduced vehicle dependence and focus on active transportation options. These promote the usage of walking, biking, and public transit usage in the City, which will improve air quality and resident health. These include:

- Encouraging mixed-use developments that reduce vehicle dependency and promote walkability and bikeability.
- Increasing the number of required bicycle parking spaces in all developments.
- Right-sizing the amount of motor vehicle parking spaces required for uses and providing for certain reductions and credit.
- Enhancing public transit accessibility by requiring developments to include bus shelters and safe pedestrian crossings.
- Encouraging the installation of electric vehicle (EV) charging stations in commercial and multi-family residential parking lots.

5. Improving Open Space and Community Resilience

The AEAC is tasked with protecting and preserving natural resources, as well as promoting the use of open land for environmentally beneficial purposes. These new ordinances achieve these goals and promote more sustainable practices for open space, local agriculture, and environmental protection. These include:

- Mandating that new developments contribute to community parks, greenways, or urban farms, or providing a fee-in-lieu-of option for recreational or conservation uses.
- Encouraging community gardens and urban farms to promote local food production and biodiversity.
- Requiring developments within flood-prone areas to include flood resilience measures, such as elevated structures and wetland-adapted vegetation buffers.

The Environmental Advisory Council appreciates the City's commitment to updating its land use regulations to better serve the community. We strongly believe that adopting these ordinances will further position Allentown as a leader in sustainable urban development and environmental stewardship. We welcome the opportunity to assist in their implementation.

Thank you for your time and consideration. We look forward to continued collaboration on building a greener, more resilient Allentown.

Sincerely,
The Allentown EAC