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February 21, 2020

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

RE: Zoning Map Amendment – Parks to Medium Density Residential - Planned

District

City of Allentown Lehigh County

Dear Mr. Hanlon:

The Lehigh Valley Planning Commission's (LVPC) Comprehensive Planning Committee will consider the subject amendment at its meeting on February 25, 2020, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). The LVPC will issue a second letter on or after the Committee meeting should the Committee have any additional comments.

The subject application proposes to amend the zoning map by rezoning two parcels from Parks (P) to Medium Density Residential – Planned District (R-MP). The site is located at St. Elmo Street and Fairview Street (PINs 549645774014 and 549646507548).

This proposal is generally inconsistent with *FutureLV: The Regional Plan* because it conflicts with the LVPC policy to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (Policy 3.2).

While the site is located in an area designated for Development in the General Land Use Plan, mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the presence or previous existence of a surface mine on the site. Development is not recommended on sites containing surface mines because of the environmental hazard posed by unpacked and unstable earth, resulting in sinkholes. The existing Parks zoning designation for this property is far more suitable because it is unlikely that the site is able to withstand the weight of medium-density development, utilities and infrastructure.

The LVPC urges the City of Allentown to ensure that development is viable prior to

adopting a zoning change that would allow the development of residences by right. This may include, but is not limited to, extensive ground testing and environmental remediation of the project site.

If you have any additional questions regarding the content of this letter, please do not hesitate to call. As a reminder, in accordance with MPC requirements, any ordinance amendments should be forwarded to the LVPC after official adoption. Thank you very much.

Sincerely,

Jillian Seitz

Senior Community Planner

Cc: David Kimmerly, AICP, Chief Planner