



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO
Chair

CHRISTINA V. MORGAN
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

September 2, 2025

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

**RE: Comprehensive Zoning Ordinance and Map 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
 - <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 Zoning Ordinance. The purposes of the Zoning Ordinance, as specified in Section 600-01.E of the Ordinance, include "protecting and promoting the public health, safety and general welfare" and "implementing the policies and goals of the comprehensive plan". The stated Community Objectives (Section 660-01.F) also include preserving neighborhood character and historic resources while fostering reinvestment, walkable mixed-use development, and affordable housing, promoting economic growth, and expanding transit, pedestrian, and bicycle options, all in support of the vision for a vibrant and connected Allentown outlined in the City's Comprehensive Plan.

Land Use and Development

The proposed Draft Zoning Ordinance Update introduces a modern zoning framework based on the physical form, design, and context of development. The City's proposed zoning districts include Mixed-Use Zones that integrate the commercial and business activity with residential uses, Neighborhood Zones that prioritize housing opportunities, Industrial Zones that cluster higher-intensity land uses in areas that minimize impacts on other land uses, and Public-Institutional Zones that centralize parks, open space, civic buildings and other essential public spaces. The flexibility in regulation that form-based codes provide allows diverse land uses to evolve through infill, reuse and redevelopment while maintaining context sensitivity throughout

neighborhoods, promoting active ground floor commercial spaces that enhance economic development, and promoting walkable environments (of *FutureLV* Policies 1.1, 5.4, 4.1 and 2.2).

The application of the new zoning districts to the City's Proposed Zoning Map is cognizant of existing neighborhood character and land uses while allowing regulatory flexibility. This approach provides greater consistency across neighborhoods as community needs evolve over time, and promotes predictable land use patterns while reinforcing the existing neighborhood character and protecting community assets, such as corner stores. By applying zoning districts in a way that reflects surrounding context, the City is fostering neighborhood vitality, protecting community assets, and enabling sustainable, incremental growth cohesive between neighborhood-scale priorities, Citywide and regional goals (of *FutureLV* Policy 1.4).

The proposal encourages context-sensitive growth in Downtown Allentown by limiting building height on smaller lots while enabling flexible development options on larger parcels. Smaller sites contribute to the fine-grained, pedestrian-oriented character of downtown, while larger sites can accommodate more intensive development that advances local and regional economic and housing goals, and these considerations enable the City to respond to changing market conditions while retaining character and culture (of *FutureLV* Policy 1.3).

The City's Draft Zoning Ordinance Update also promotes mixed-income communities and addresses the region's housing needs (of *FutureLV* Policy 4.5) by including provisions for accessory dwellings and a density bonus when applicants incorporate affordable housing into projects. The City's definition of Housekeeping Unit reflects modern-day living preferences and promotes safe, inclusive and livable communities (of *FutureLV* Policy 5.1).

The proposal includes procedural flow charts that help users visually understand how and when amendments go to LVPC or the City Planning Commission for review before going to City Council for enactment. Visualizing processes in ordinances aligns with *FutureLV* as a best practice that promotes transparency in government processes (of *FutureLV* Policy 1.4).

Transportation

Walkability and encouraging alternative transportation modes are two of the community objectives stated in the Draft Zoning Ordinance Update (Section 660-01.F). The proposed parking regulations support a more compact development pattern by right-sizing parking availability and avoiding overbuilding parking in the limited space within the City, while providing for the daily needs of businesses, shoppers, employees, residents and visitors (of *FutureLV* Policies 1.1 and 2.2). The ordinance incentivizes the creation of electric vehicle charging spaces and the integration of car-share, bike share, motorcycle and scooter parking, which supports the expansion of technology (of *FutureLV* Policy 2.5) and encourages alternative travel options (of *FutureLV* Policy 2.1).

Environment

The Draft Zoning Ordinance Update incorporates provisions for waterfront buffers, parking lot landscaping, updated tree and canopy standards, steep slope protections, and lighting performance measures that advance the environmental objectives of *FutureLV*. These updates demonstrate the City's commitment to protecting natural resources, enhancing community character, and promoting sustainable growth (of *FutureLV* Policies 1.1 and 3.1).

As the City looks to future opportunities to continue refining its zoning code after adoption, the LVPC encourages the City to further strengthen the environmental standards through expanded waterfront buffer widths, increased size of parking lot landscape islands to maximize stormwater

and shade benefits, increased protections for moderate slopes, and reducing light pollution through Dark Sky principles. Clarifying and expanding definitions of green infrastructure and ecological terms would also strengthen the City's commitment to environmentally conscious growth and further enhance environmental resilience, community health, and livability across the city (of *FutureLV* Policy 3.2).

Regional Leadership

Allentown's proposed zoning ordinance establishes the City as a regional leader in modern, people-centered land use regulation by prioritizing the public experience and integrating multiple transportation modes. Illustrating standards with clear diagrams improves transparency, and allowing a flexible mix of building types, scales, and densities supports community needs while protecting neighborhood character. In doing so, Allentown positions zoning as a proactive tool for economic sustainability and quality of life, which serves as a model for communities across the Lehigh Valley to manage growth in ways that strengthen both place and people.

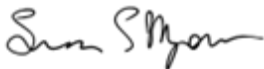
Municipalities, when considering ordinance updates, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)].

Please feel free to reach out if you have any questions.

Sincerely,



Jillian Seitz
Chief Community and Regional Planner



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