



Allentown Environmental Advisory Council

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Allentown City Council
City of Allentown
435 Hamilton Street
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Subject: Recommendations for Updates to Zoning Ordinance and Subdivision & Land Development Ordinance (SALDO)

Dear Members of the Allentown City Council and Mayor Tuerk,

On behalf of the City of Allentown's Environmental Advisory Council (EAC), I am writing to provide recommendations for the proposed updates to the Zoning Ordinance and the Subdivision and Land Development Ordinance (SALDO). The EAC'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 reviewing the proposed changes, we have identified areas where updates could further align with and advance these goals.

1. General Support and Concerns

The AEAC appreciates the City's approach in structuring these ordinances to protect and promote public health, safety, and welfare. We recognize and commend the incorporation of many of our previously recommended protections from our June 15, 2024, comments regarding the April 2024 draft of Allentown's zoning ordinance. However, we remain concerned that the City has not adequately preserved for itself the authority to deny permits to facilities that significantly increase truck traffic, particularly in residential neighborhoods or near green spaces.

Warehouse and logistics facilities are classified as IX, IG, or IM uses based upon square footage of indoor or outdoor use. The proposed zoning map allows these uses in some areas that would require trucks to go through dense neighborhoods and green areas before accessing a highway. We strongly recommend a more granular classification based not only on square footage but also on predicted truck traffic. Zones permitting higher truck traffic should be limited to low-density areas in proximity to expressways and away from parks.

2. Strengthening Green Infrastructure Requirements

The proposed updates in SALDO address stormwater management and erosion control; however, we recommend expanding the requirements for green infrastructure. Specifically, the ordinance should:

- Encourage the integration of rain gardens, bioswales, and permeable pavements in all new developments to reduce stormwater runoff.
- Further encourage the use of green roofs and rooftop gardens, particularly for commercial and multi-family developments, to mitigate urban heat island effects and improve air quality.
- Establish a requirement for tree canopy coverage in parking lots and along major corridors to increase urban cooling and carbon sequestration.

3. Enhanced Protections for Natural Resources

While the proposed ordinance revisions include preservation efforts, the following enhancements are recommended:

- Designate priority conservation areas within the City to safeguard ecologically sensitive lands and waterways.

4. Encouraging Renewable Energy and Energy Efficiency

To align with the EAC's commitment to reducing greenhouse gas emissions, we propose:

- Requiring all large-scale developments to incorporate renewable energy sources such as solar panels or geothermal systems.
- Offering incentives for energy-efficient building designs that meet LEED or Passive House standards.
- Further encouraging mixed-use developments that reduce vehicle dependency and promote walkability and bikeability.

Additionally, we support the City's proposal to allow for additional building height in mixed-use corridors in exchange for affordable housing. To ensure that the proposed affordable housing is truly affordable, inclusive of utilities, the City should require the housing to meet the 2015 International Energy and Conservation Code, as well as energy and water efficiency standards of 1.5 gallons per minute at 60 pounds per square inch for faucets and 1.8 gallons per minute at 80 psi for showerheads.

5. Expanding Sustainable Transportation Options

The updated zoning ordinance includes references to pedestrian-friendly designs; we suggest:

- Increasing the number of required bicycle parking spaces in all developments.
- 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.

6. Improving Open Space and Community Resilience

To promote the use of open land for public benefit, we recommend:

- Mandating that new developments contribute to community parks, greenways, or urban farms.
- Encouraging community gardens in vacant or underutilized lots to promote local food production and biodiversity.
- Requiring developments within flood-prone areas to include flood resilience measures, such as elevated structures and wetland buffers.

The Environmental Advisory Council appreciates the City's commitment to updating its zoning and land development policies to better serve the community. We strongly believe that integrating these recommendations will further position Allentown as a leader in sustainable urban development and environmental stewardship. We welcome the opportunity to discuss these suggestions further and 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,

Environmental Advisory Council