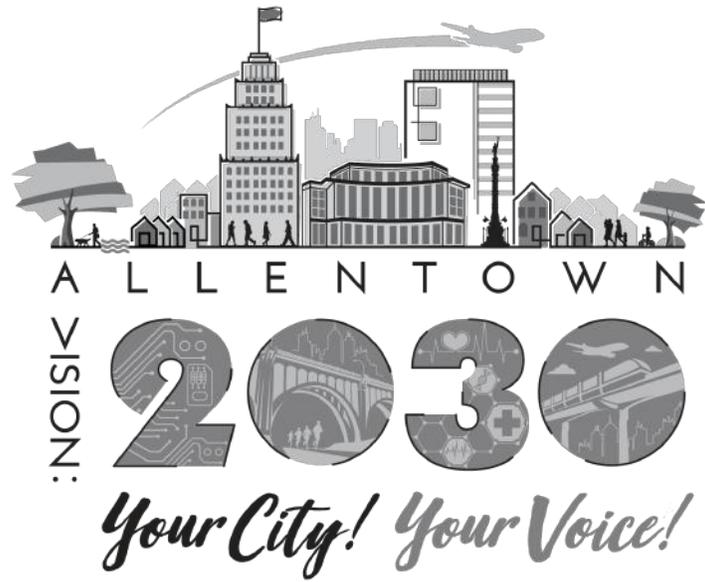


# Appendix: Public Comments (SEPT - OCT 2019)

2018 - 2019  
Allentown Comprehensive + Economic Development Plan







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2018 - 2019  
Allentown Comprehensive + Economic Development Plan



**CITY OF ALLENTOWN**

Comprehensive and Economic Development Plan

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**2018 - 2019**

This document is an appendix for the 2018-2019 Comprehensive and Economic Development Plan for the City of Allentown

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**ACKNOWLEDGMENTS**

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Finally, we would not have the Allentown Vision 2030 Plan without the incredible participation of our Allentown community – residents, workers, youth, and all those who engaged with the plan development process through meetings, at the Community Engagement Hub, our community survey, and the many other events held throughout the planning process. Thank you for your time, your participation, your ideas and sharing your VOICE to create a shared vision and plan for the future of Allentown!

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## Executive Summary Comments

“We recommend that, on page 8 of the report, the vision statement for economic inclusivity be revised to state that “In Allentown, anyone, regardless of their sex, gender identity, sexual orientation, place of birth, family background, age, race, ethnicity, or other circumstances, has frill and fair access to labor markets, financial tools, and entrepreneurship, and more generally, economic opportunity.””

“note that a strong educational system is required to balance economic disparity”

“industrial uses are not listed as source of tax revenue growth”

“The initial Mack Truck Plant was built along the Little Lehigh Creek North of what is now Mill St along Lehigh St. The buildings on S 10th St were built in the early 1920’s”

“Mack closed several plants in Allentown in the 1980’s the last to close was Plant 5c on Vultee St. in 1987”

“Some of the principals have a significant potential to conflict with each other and/or with the City as a steward vision statement if not developed and implemented carefully. Also terms like “enhance land value” are very vague. Enhance land value for what use or for whom? Those could yield very different answers...”

“the words manufacturing or industrial do not appear as opportunities in any of the four areas of the city when the South and East sides both have significant potential in that regard.”

“Zoning Code rewrite comment makes no mention of manufacturing or industrial uses. There is also no mention potential increase in cost of City services as a result of proposed land use patterns. It is well documented that residential land uses in PA cost more in services than they typically contribute adding that burden to other land uses.”

“While valuable, neither catalytic action listed under Economic Development will be successful if existing businesses and employers in the City don’t continue to see value in staying in Allentown.”

“Vision Statements. I appreciate the focus on both economic inclusivity and diversity, but I believe there is an opportunity for a stronger statement on equity that is alluded to in both but stated explicitly in neither. Discussions of equity should be broader than just economics, and diversity on its own without

a commitment to equity will fall short. Relatedly, is there explicit language on racial discrimination/equity opportunities in the plan? Maybe I missed this in my read, but it's something that's real in Allentown and should be addressed head-on."

"A schedule [for implementation] would be great - understand what is coming along; should have a chart that shows what has been done and where we are going; keep it easy and clear"

"What happens/who moved the needle on the last plan? (what progress has been made from the last plan)"

"Need to have 1:1 meetings with groups and communities; the renovation of Casa - people were excited to see something happen"

"Reach out to churches to build awareness"

## Economic Development Comments

“Additionally, on page 70, the second goal under supporting the entrepreneurial ecosystem should be revised to read, “Increase the successful launch, expansion, and sustainability of diverse-owned businesses, including minority, immigrant, LGBT, and women-owned small businesses and entrepreneurial enterprises.””

“The report outlines how investing in arts and cultural events can build the local tourism industry and contribute to economic development. The report also states that the city has a role to play in expanding awareness of diverse communities that have contributed to the City’s cultural landscape. As the organizers of Lehigh Valley Pride and numerous LGBT arts and culture programs, we could not agree more. As such, we recommend that the goal on page 71 be revised to state: “Expand Allentonians experience in art and culture by establishing a minding mechanism for administration of a public art and culture program throughout the city that celebrates the works of artists who are members of historically underrepresented groups and cultural institutions that exhibit or present works by artists from historically underrepresented communities

“LVPC feels that the location and intensity of economic development - especially cultivating a higher number of manufacturing and/or low-skill jobs - should be more strongly tied to the transportation network. Land uses like manufacturing and warehouse/logistics produce a high volume of truck traffic, and should be located in areas with appropriate transportation capacity. Additionally, many of the potential workers would benefit from these jobs being located in areas accessible by public transit and/or bicycles and pedestrians.”

“the Economic section refers to the additional cost carried by workers commuting outside of the city for employment; however, the section does not appear to address where jobs should be located in order to be accessible by lower-income people whom may not have/can afford a car. While this is covered partially in the third chapter of the plan, it would be good to emphasize the importance of locating jobs in transportation-accessible areas to reaching the city’s equity goals.”

“the NIZ allows property taxes to be reinvested in financed projects. This limits how much money is going into the city’s general fund directly from development in the area. ED1a may want to highlight income or sales tax benefits from the NIZ.”

“similar to previous comment, the location of LERTAs could be tied to areas that have mixed-transportation access or that have modern infrastructure needed for shipping and manufacturing.”

“why does this page have so much information on the LERTA program? The NIZ, KOZ and EZ programs are only briefly mentioned and the plan does not contain details on these respective programs.”

“Union Boulevard corridor does not seem like a good location for manufacturing as it is relatively far from major highway interchanges and could have significant transportation impacts.”

“English as a Second Language is most often now referred to as either just English Language or English Language Learner programs, given that many foreign-born residents already speak multiple languages.”

“good to see a strong focus on education. Is there any way for the City to partner with/support the school district?”

“consider adding language to the economic development section about the importance of quality of life in attracting and retaining entrepreneurs.”

“section ED4b doesn’t sell the potential of adaptive reuse as well as it could and focuses a lot on potential draw backs. Consider bringing the second sentence from paragraph 1 in ED4a down here and highlighting the potential of successful adaptive reuse in preserving the history and aesthetic of the city while contributing to its economic revitalization.”

“section ED4c focuses on defining what an Opportunity Zone is and how the program works. Consider highlighting the potential of the Opportunity Zones and how the city could build off the potential investment. (This may be a good place to highlight the vacant land that is available in the Opportunity Zones.) Consider revising the map to show the full extent of the Opportunity Zones.”

“consider mentioning that the existing zoning code is in opposition to how the city originally grew and developed, and does not allow for the dense mix of uses typical in historic urban areas. Updating the zoning code would allow for development more in line with historic development patterns.”

“consider tying zoning update back to the manufacturing section’s goals of adding manufacturing in key locations.”

“clarify first bullet point under “Next Steps.””

“introduction in this section is much shorter than in other areas of the plan.”

“Consider adding ED5c Provide Active Transportation Connections to Nearby Cities via D&L Trail: the content about this one would highlight the reuse of the Lehigh Canal towpath and former rail lines for multi-use trail connecting east and south to Bethlehem, Easton, and Philadelphia and north to Slatington, Jim Thorpe, and Wilkes-Barre - also that trails can be commuting corridors to jobs but also attract visitors and fuel the economy with tourism”

“Historic preservation of residential, commercial, and office buildings in Allentown helps tell the city’s story, build its status as a destination by attracting heritage tourism, and increase tax revenue by encouraging the improvement and reuse of buildings. Please consider integrating language that includes the Lehigh Canal corridor”

“Allentown has always been connected to regional markets. In the 1800s, the Lehigh Canal opened the town to increased trade with the eastern seaboard, and in 1905 Jack and Gus Mack moved their motor car plant to Allentown from Brooklyn. Today, Allentown is connected by bus to the larger markets of Philadelphia and New York, and by plane via the Lehigh Valley International Airport and potentially to Wilkes-Barre and Philadelphia via the D&L Trail running through the Delaware & Lehigh National Heritage Corridor. As the nearby metropolitan areas continue to grow and connect, there is an opportunity to leverage connections with Allentown’s growing economy. Regional tourism can help to support small businesses and a burgeoning art scene, and highlighting Allentown’s value proposition”

“Retail Development in the Central Business District: We suggest a consignment shop for art made by local kids be developed. Children’s art is very saleable and parents would come downtown to see their work. The store could be a training program for young entrepreneurs, as well, and the store could even serve as a retail business incubator for such entrepreneurs.”

“Keeping People Downtown Following Events: The restaurants and bars do great business on nights when there are events at the arena. However, as soon as the event is over, the downtown empties out. The city should explore opportunities to keep those people downtown later into the evening with some kind of attraction, such as a laser light show, fireworks or even a zipline (OK, that might be going too far, but let’s be creative!). While on the subject of the arena, this extraordinary asset has been seriously underutilized. It is imperative that more events be booked in order to bring more economic activity to the downtown.”

“Lights: With both PPL and Lutron, the Lehigh Valley has a unique tandem that could “light up” the city. Paris may be the City of Lights, but we should explore ways to use light to attract people in the evenings.”

“Principal 5 should also consider the benefit of our location to the NE market for our manufacturers in the City.”

“It is important to note that even though we rely less on manufacturing now

than in the past, manufacturing in Allentown and the region contributes more to the Regional GDP than it does at the national level to the national GDP. LVEDC can provide the specific data to support this. Every Comp plan I have ever seen the City prepare has made numerous casual statements that are excessively dismissive to the continuing importance of manufacturing. In reference to the comment above (principal 4e), how would you feel if you were an existing manufacturing owner in the city? Not a very good “business focus”. I would prefer that we celebrate the continued strength in Allentown’s manufacturing. See Page 54 as it includes data under ED2c about the continued significance of manufacturing by employment count.”

“in figure 4, under the jobs inside the city (the green bar chart) do we have any additional insight regarding how the Census Bureau classifies “management”? It’s hard to comprehend how a management position (at least how I would interpret one) would have an average annual salary of \$26,732.”

“Given the significance of manufacturing in the City it would be helpful to see what the ave. manufacturing wage for those jobs inside the City. Also figures 3 and 4 seem to present identical information.”

“Under City as a Steward, manufacturing or industrial uses are significant RE tax contributors and should be incorporated by specific reference in this section in addition to commercial and residential”

“While both are covered in this section it is important to note that job creation in a region is typically 80% from growth of existing companies and 20% by new companies moving to an area. Efforts by City and other econ dev partners should mirror that”

“Has ADP “invested in new Real Estate”? I believe they are tenants so while they may have supported investment in RE we should verify the language here.”

“last Federal Assistance bullet should be “via Economic Development Administration””

“in addition to truck drivers and health care, LCTI has indicated a continued expanding demand for electromechanical technicians, welders and machinists.”

“Under next steps: small spaces, while lower rent overall typically have a higher per square foot cost. Flexibility of shorter leases and proximity to other entrepreneurs may be equally important to cost factors.”

“ED3d. How will this be funded? Also, under the first of the bullet points, we should only be repurposing industrial buildings if they cannot feasibly be returned to manufacturing use... see ED1c.”

“Please add AEDC’s Pennsylvania Minority Business Development Authority Loan program to the financing list. Also the City RLF and EZ loan programs both start at \$35,000. Additionally, I believe that Rising tide goes as low as \$10,000 so that should be confirmed. Loan amounts under \$10,000 are extraordinarily challenging to functionally administer in a financially sustainable fashion.”

“Again, we should qualify that adaptive reuse projects should only be supported on buildings that the City and AEDC have determined cannot be reasonably reused for manufacturing.”

“LVLRI is a brownfields redevelopment coalition. While we do clean up occasionally, most of LVLRI’s work is characterization. Why are we already considering or discussing conversion of industrially zoned land to commercial or residential? Conversion from industrial zoning to other zoning uses would likely increase the land value for the property owner but could have other unintended consequences in terms of employment, wages and tax base diversification.”

“Under the second bullet the existing zoning ordinance already allows adaptive reuse. The new ordinance should only support adaptive reuse for buildings that cannot be feasibly renovated to support manufacturing.”

“Partner more effectively with the school district to promote city pride and service opportunities. Reaching children in the Elementary years is crucial to our city. Help the District in funding trips to city landmarks, museums, city hall, parks, etc... For middle and high school youth to have more opportunities for students to participate in/job shadow or volunteer, and survey all youth demographics about their wants and needs. This will enable children to feel connected to their neighborhoods and the city. Therefore, they may think twice before littering, vandalizing, committing acts of mischief, or worse. This cannot be a one time offering; for it to mean anything, it has to be consistent and our youth have to see that these connections to a better city mean a better future for them.”

“There are several mentions of providing for our youth in Allentown, but there has to be more direct engagement in the schools and with the Allentown School District. Our kids can’t feel connected to the City if they are not taught about it or shown all that it has to offer. They are the future of our City and they have to see and learn how that is possible beginning in elementary school. It cannot be a one time shot at a job fair in high school, but consistently presented and encouraged throughout their academic years so that they are prepared to be a proud, productive, involved resident of Allentown. Link city jobs with subjects that are being taught, have more student intern (for credit) and job shadowing opportunities, promote volunteer and service activities, coordinate with specific schools to do clean-ups in their areas, and be consistent with the message that kids matter. Also, encourage the businesses in the city and the Chamber Commerce to do the same. The more kids see and are exposed to something the more involved they will become.”

“The Allentown Parking Authority facilitates the residential parking permit program per city ordinance 534.02. This program provides for permitted parking in neighborhoods that meet the criteria as set forth in the ordinance with the intent “to alleviate the hardship experienced by residents in obtaining on-street parking space to preserve the residential quality of neighborhoods and to provide for improvement in air quality.” The ordinance was set into law in May of 1986. Quite a lot has changed since that date and some of the residential neighborhoods that once existed have become retail centers and dining spots. This growth has changed the landscape of these areas from residential in nature to commercial in purpose. An unintended consequence is that consumers are left with little options for parking as permit holding residents are parked in front of the shops and restaurants. In some areas there is an unwelcome increase in double parking which reflects negatively on image that Allentown wishes to portray and creates safety issues for pedestrians and motorists. Considering these positive changes, the Allentown Parking Authority would welcome discussion and partnership with Vision 2030 with the hope to revise the residential permit program with to meet the changing landscape of the city. It is our position that the program no longer functions to the benefit of the city in some areas and changes should be considered in order to continue to foster the growth that our city is experiencing and manage parking more effectively.”

“What is being done to link the youth from Allentown to the apprenticeships available in our community”

“What are your main focuses for education and dropouts.”

“With the unused commercial space, will there be or is there currently a requirement of large business to contribute/collaborate with community/city Ex. sponsoring youth center, outreach programs,”

“do you have a specific plan to better the education for students in Allentown?”

“Ways to instill pride start with our children. The City needs to be more present in our schools starting in Elementary Schools. Encourage more field trips to City sites - City Hall, Art Museum, Parks, etc. Help our students understand their role in society and the city i.e. service projects for school credit, civics.”

“Exchange of workforce - Does that reflect the regional trends? Is it correct?”

“Skill piece - what a job pays is a function of skills required for jobs; how create opportunities for skill building AND attract business investment; constraint of skills for Allentonians - skills are not necessarily in demand”

“Dominant Industries section: LVEDC reference (figure 5 - what are #s on the Y-axis); industry level view vs occupational level views - what do the jobs look like; alignment with Vision - jobs for unskilled”

“Increase Local Employment - whose responsible? who is making this recommendation? Is that the responsibility of LVEDC?; BEAR Office?”

“Market NIZ..” - could use much more description; Is the NIZ the most important item in increasing local employment?; NIZ is more about developers - more focused on the marketing aspect (i.e. how do we market?); places outside NIZ - location for job creation projects”

“How does LERTA work for Allentown?”

“For increase local employment - need a more significant action”

“ED1c - ‘Incentivize Dev...’ - included LVEDC/AEDC (attract biz investors to create jobs)”

“Access to skill building - Allentown and region; relationship to ASD; critically important to get feedback from WIB (should review section in detail)”

“Apprenticeship programs - what does this problem solve? Should make more explicit (LVEDC is not an accurate reference for this recommendation) - should be WIB”

“Small businesses - is space the main issue for entrepreneurs? (consider support vs. allow in this section); what does ‘small business’ mean for the City of Allentown? Should define terms up front. (LVEDC doesn’t do much in small businesses)”

“Should help activate small businesses - they are family sustaining; should decrease barriers”

“Historic preservation (econ dev) - should the description be here? section needs to be revised”

“Brownfields action - is city maintaining the inventory?”

“Connect to regional markets - what makes Allentown unique? More people than the places; involve LVEDC in 5a - phrasing ‘attempt to show Allentown is a vibrant place - as a great place --> LVEDC wants to be a part of that”

“Financing - have the bankers reviewed/CACLV; clarify - financing for debt or equity; role of city is limited; need to understand available resources (people aren’t aware of resources)”

“analyze political economy of the NIZ in relation to “Allentown for All” inclusivity. Where is the money from commercial development over the last 10 years going? is it benefitting certain actors disproportionately”

“Consider non traditional students in ‘skills and training’ principle - have to consider childcare/transportation/etc.”

“political economy of the NIZ; increase development in NIZ and increase in rent rates”

“ bring people in city; partnership for skills and education; prepare inner city people for jobs”

“Bring in jobs for population we have”

“Companies should have to bring resources into community/centers/ nonprofits”

“Developers don’t want to come to Allentown ‘too much bureaucracy’”

“Free English classes; free classes to get jobs; free spanish classes”

“I care about the people of Allentown and having the skills to provide for ourselves and providing opportunities in Allentown will help build Allentown. Not those bourgeoisie restaurants. What’s the point of the PPL center and these bars if we can’t afford to enjoy it?”

“Principle 2: Increase Access to Training and Skill Building -An important factor in attracting potential and existing employers is a highly-skilled labor force. Allentown will ensure its residents are aware of educational resources and get the right skills training to take advantage of high-wage job opportunities.

Feedback: Ensuring its residents are aware ignores all the variables (obstacles) that can get in the way of Allentown residents getting the right skills. Awareness is a start, however it doesn’t necessarily increases access to training and skill building. We need to have conversations with corporations like ADP to identify what credentials, diplomas, certs, and/or degrees can make our residents competitive candidates. 90% of employed city residents work outside of the city.”

“The 2030 plan outlines that one way to balance the uneven job distribution pattern is to encourage more jobs in the City of Allentown that are available to the people who do not have more than a high school degree. This is an idea, however without any support from the corporations currently in Downtown Allentown or any company in the midst of moving to downtown it’s uncertain how we can effectively encourage corporations to add high school degree positions that can pay a livable wage.”

“Furthermore, it keeps the high school graduate as high school graduates within a salary bracket that currently cannot cover the whole nor does it give those who are working enough leg room for a quality life. The numbers below

demonstrate the disparity between city residents working outside the city vs. commuters working in the city.

80% of the jobs in the city are held by commuters (35,767)\*

90% of employed city residents work outside of the city (39,324)\* Note: The jobs that these workers hold often do not require high levels of education. They also do not pay high wages. Generally jobs outside Allentown pay less than jobs inside Allentown. Due to low wages, community members shared that it can be necessary to work two to three jobs.”



## Housing Comments

“The LVPC does recommend adding language about preserving existing affordable housing, as well as reviewing the LVPC Model Ordinance on Inclusionary Zoning.”

“The LVPC recommends adding language tying [the accessibility and connectivity] chapter back to the Economic Development and Housing Chapters to make it clearer how the principles of each section complement each other. The LVPC also recommends adding text on transit-supportive density and how that can support both the city’s future housing needs and strengthen the transit network.”

“consider mentioning that much of Allentown’s housing stock is older and in need of investment, making housing less affordable than what it seems based on median sales price.”

“the Anti-Displacement Strategy seems like a major initiative/policy announcement. Consider moving it from the section introduction to one of the policies so that it more clearly reads as an implementation step.”

“the STABILIZE, GROW, THRIVE neighborhood housing strategy is a great framework for approaching the city’s diverse neighborhoods and housing conditions.”

“consider adding language about preserving existing affordable housing, given concerns that the housing market could become more expensive in the future. This language may also fit under Principle 3.”

“section H1a is missing citations for the statistics.”

“does the HUD study only specify the need for new/additional rental units, or does it include existing?”

“consider renaming Renter Protections” “Performance Based Rental Inspections.””

“last paragraph effectively recommends against increasing code enforcement efforts. Consider revising or clarifying recommendation.”

“section H1c is much shorter than other sections. It might be good to describe what a “housing court” is and how it differs in function from regular courts.”

“recommend reviewing LVPC Model Ordinance regarding Inclusionary Zoning in PA.”

“consider clarifying how a Land Bank is different from a Land Trust and how the tools would be used by the municipality.”

“A Funding Mechanism for the Housing Trust Fund: The proposal to create a housing trust fund needs a funding mechanism. We suggest that an acceptable percentage of new tax revenue generated by the success of the Neighborhood Improvement Zone be set aside each year.”

“Principal 1 is so generalized and uses several buzz words to the point that I don’t think it clearly conveys the important concepts that we want it to say. Principal 2, Allentown already does more than its share of providing affordable housing (agree that the quality and condition of much of it requires improvement). Also agree that the Lehigh Valley needs more affordable housing but am concerned that Allentown simply cannot sustainably support more of it. We can also do a better job of integrating housing into mixed income neighborhoods.”

“As indicated at the end of the first paragraph this is a regional issue and asking Allentown to correct it without significant cooperation from the other 61 municipalities will likely only serve to increase the concentration of poverty in the City.”

“There is no reference regarding the 30% increase in rental rates, what is the source of these data?”

“one reason that there has not been a significant amount of new housing is that the Allentown market is so depressed that new construction or significant renovation in some neighborhoods may be worth less than the cost of the construction or renovation. This raises the possibility of making it unfinanceable and certainly not attractive to developers. If not carefully crafted an anti-displacement strategy could add more headwind to potential new development investment in the City in already depressed RE values.”

“Under Grow, mixed used neighborhoods add stability and opportunity for all of their residents, however, requiring additional density of affordable housing through inclusionary zoning will perpetuate the lack of new market rate construction interest particularly for single family homes. Incentivizing affordable housing in replacement and expansion in key areas identified by the City will be a more effective approach.”

“The top sidebar indicates that affordability, rental quality and preservation of historic buildings were the top three concerns from the survey, however, when I look at the survey results on the Allentown Vision 2030 website I don’t see those data. On the page titled “Top Developments that Respondents Felt Allentown Needs More of” Affordable housing is shown as part of the “other” category aggregated to only 17%.”

“Consistent performance-based code enforcement may also help to stabilize property values which is repeatedly listed in this plan as a goal”

“Principal 2 lists former industrial sites as potential housing redevelopment sites. This will simultaneously reduce RE taxes while adding cost in services. That strategy may also reduce future accessible employment opportunities for some of the Cities existing residents.”

“I have not yet reviewed the IBC guidance relating to building placement and size but would be cautious implementing a single universal approach to defining the form and density of Allentown’s residential neighborhoods.”

“There are numerous potential second and third order consequences to many of these recommendations in this section that need to be thoroughly investigated. Some of the recommendations assume or project an increase in property values which still has not taken place in many neighborhoods.”

“Under next steps I would move “Partner with Lehigh County” to the top bullet as without a regional commitment to IZ it has not been effective elsewhere in the nation.”

“Under H2b it is doubtful that garage apartments or other ADU’s would share the sanitary sewer lines of the main dwelling. Also, the parking demand would need to be carefully studied for any neighborhoods where this is proposed. We should also evaluate the longer-term impact on assessed value of homes with ADU’s through interaction with the County Assessment office.”

“The affordable housing overlay and land trust both need County support (or support from existing regional housing not for profits) to be successful. Allentown does not and will not likely have the continued resources to do this alone.”

“Under next steps for H3B, housing is not part of AEDC’s mission (while numerous housing not for profits already exist in the City) so it is unclear how this bullet even arrived here without any discussion with AEDC at all...”

“the total population of Vermont is less than that of the Leigh Valley, so it is perhaps not a very compelling example given the differences in density and economics.”

“H4a the third bullet under Next steps again targets former industrial buildings we should clarify this to only target industrial buildings that are not suitable for industrial or manufacturing use.”

“Work with existing not for profits and the County that already have components of a residential land bank. The specific partners should be listed rather than the loosely noted reference under Partners.”

“I would like to see a brief mention of the need for additional supports for renters to help reduce eviction rates and displacement due to failed building inspections.”

“I would also like to see a brief mention of the need to develop a more efficient, and more effective, processes for managing housing vouchers and public housing in the city, perhaps beginning with a thorough review of current practices and processes “

“Finally, I strongly oppose the use of inclusionary zoning language in this document. These policies have very poor records in other municipalities in which they have been implemented, and there have been no adequate studies to indicate that this type of policy would benefit Allentown’s residents. As inclusionary zoning is just one housing policy model among many, I would recommend replacing this language with a more general commitment to examining housing policies that have been successfully applied in other municipalities to achieve the broader housing goals identified in this document. Importantly, these assessments should be led by persons qualified to make such assessments.”

“Housing: I am thrilled to see an emphasis on both local housing trust funds and the National Housing Trust Fund as tools for housing affordability. The NHTF has a specific focus on supporting families who are at 0-30 and 30-50% AMI, and this plan should make very clear that serving people with extremely and very low incomes should also be a priority of Allentown’s affordability efforts. This is absolutely critical, and I’d be happy to discuss more if needed.”

“In addition, the issue of fair housing, which has a real history and implications in the City, should be addressed beyond a reference to housing court.”

“What can the city do to stop slumlords from neglecting their buildings?”

“Granny Flats? Will that be available to all Allentown homeowners w/a specific type of land space? How soon?”

“How would the Granny flats work w/Home owners, what would be that process, like??”

“Is the need for more housing inspection/more efficient code enforcement addressed in the actions?”

“I bought a property that was in Blight. It has been 3 months of endless disappointment working with zoning and building. I am pro improvement zone. The problem is my licensed plumber electrician HVAC are licensed in Bucks and are not allowed to work in Allentown. I am trying to go by the book to rehab my property and Allentown is one of the worst cities to work in. How can me as a property owner living and having rentals be reassured that the zoning and building work with us. Meaning a township that borders Lehigh county should be reciprocal agreements. The work will be inspected never the less but its made very difficult currently.”

“Historic District has been done several times. Each Administration changes it. Parks [integrated] every neighborhood viable retail outlets on Hamilton Filling stores on Lehigh Sts.”

“Flex Housing = Additional [?] “Presently [?] is a Huge problem in large part because of multi-units”

“Concern about granny flats and creating issues with parking”

“Too many houses built into ‘alley’ streets”

“Please consider how to deal with all the houses that are not able to live in”

“ADUs make sense in some areas where there is a lot of land (not in center city)”

“Rentals - need more affordability; have landlords charging high prices and not taking care of the properties; can trap people in poor quality housing because rent may be ‘affordable’ but conditions are terrible and they can’t afford to move elsewhere because of high rental prices”

“Have incentive for landlords to take care of their properties (i.e. reduction of rental inspection fee)”

“Bring back ‘wall of shame’ for landlords”

“Discussion of blighted property process - what is plan for properties deemed blighted and now under ownership by RACA; particular issue w/ building destroyed by fire on 7th St”

“City’s standards for contractors are too low - those who were contracted for facade improvements - were substandard”

“Is inclusionary zoning happening?”

“Increase housing codes/blighted properties remediation enforcement”

“When discussing land use/zoning - ‘support’ (active) vs. ‘allowing’ (passive); city government - get out of the way; who has to execute on a plan - no limit on things can ‘allow’ for vs support/advocate/incentivize”

“Flex housing = additional parking; presently - parking is a huge problem in large part because of multi-units”

“Historic district has been done several times. Each administration changes it. Parks integrated in every neighborhood. Viable retail outlets on Hamilton. Filling stores on Lehigh Street.”

“Will City make a decision where affordable housing is prioritized?”

“Process for blighted properties - competitive for nonprofits?”

“Concern - push people out of the community; when community improves - will folks be displaced? how will these issues be addressed?”

“What will the zoning updates look like in relationship to neighborhood planning and how zoning changes/updates are applied at the neighborhood scale?”

“How are you defining ‘quality’ and ‘healthy’ in Housing chapter?”

“Ensure communities aren’t displaced”

“Provide bigger callout/make an action: Anti-displacement strategy and housing unit analysis”

“Inclusionary zoning should be a regional strategy”

“Lehigh Valley does not have a fair housing office - should be regional but located in Allentown”

“Allentown has highest rent to income ration - get Allentown Housing Authority rental data”

“How can AHA work strategically with the City on their planning; currently we have ‘concentrations of poverty’ - how do we align with the city’s vision?”

“Offloading of certain AHA properties - can we work with the City land bank/ CLT to think strategically about future development and opportunities for affordable housing”

“Issue of gentrification - what is city going to do?”

“Homeownership - voucher program for mortgages (401c3) - banks don’t want to do this but maybe through a CRA”

“How to get landlords to recognize vouchers as income”

“Provide a further explanation of affordable housing revolving loan fund”

“Lower rent - \$1200 rent is ridiculous and so are these landlords”

## Accessibility & Connectivity Comments

“We encourage the plan to see EBS not as a stand-alone project, but rather as an outline for a ‘transit priority’ approach which could be followed by the City. The individual roadway and traffic signal projects (TSP) listed in the EBS study can each independently create benefit for all transit service operating in the city and we encourage the City to be mindful of and pursue those recommendations as part of upcoming projects.”

“LANta strongly encourages the Allentown Vision 2030 plan to stress the importance of comprehensive pedestrian infrastructure throughout the city; to consider the incorporation of sidewalk extensions/intersection build-outs in roadway improvement projects to create the right-of-way necessary for the installation of bus stop waiting shelters and other streetscape amenities; and an expedited process to approve of bus stop amenities.”

“LANta supports any investment that will benefit the pedestrian, and supports the densification of key corridors, TSP improvements and bus-only lane dedication that will together make transit a more feasible mode of transportation overall.”

“the current comprehensive plan is from 2005 (the Comprehensive Plan: Lehigh Valley...2030). OneLV is a companion document to the 2005 Comprehensive Plan is from 2014. Future LV: The Regional Plan is the 2019”

“recommend against using words like “disrupting” to describe transportation alternatives, as this word can be read negatively.”

“Side bar on 2019 Regional Comprehensive Plan. Please refer to the plan as “FutureLV: The Regional Comprehensive Plan.” Also, consider removing repetitive text from the bullet points.”

“Recommend using Centers for Disease Control instead of CDC. Sub-principles vary between implementation projects and general practices. Recommend greater consistency.”

“Recommend adding text on transit-supportive density. Density goals are found in the LANTA Transit Supportive Land Use report from 2013.”

“Neighborhood Digital Access. Swap the two paragraphs and try to make the paragraph on the limitations of access more hopeful and positive.”

“Uber/Lyft. The plan talks about ridesharing but doesn’t address challenges associated with pick-up and drop-off locations — especially in urban areas with greater space constraints. The plan should briefly mention the issue and where/how the city might address it through future planning or action.”

“Generally, we would like to see the D&L (via THE LINK Trails Coalition or Lehigh Valley Greenways Partnership) called out as resource and vehicle for connecting greenways and trails that link to inner city parks, neighborhoods and communities to the east and north. Also, we didn’t catch if there is any mention of greenway/trail connections on both sides of the river; if not, that would be good.”

“Consider including goal to become a bicycle friendly community (Bethlehem and Reading have Bronze status - <https://www.bikeleague.org/community>) which would include some of the already documented next steps and fits with a wide variety of the goals and principles and encourage businesses and universities within the City to strive for bicycle friendly recognition“

“PRINCIPLE 2: CONNECT PLACES IN THE CITY Well-designed streets and pathways provide alternative routes, enable bicycle and pedestrian circulation, create greater access, and decrease congestion.”

“PRINCIPLE 4: CREATE MOBILITY CHOICES Include progress being made with Walk/RollLV and its priority of closing the D&L Trail Gap in Allentown”

“CITY AS A STEWARD While the City of Allentown does not directly manage the regional transit system, LANta, the city is a key partner in planning and supporting more efficient routes through public infrastructure investments such as bus lanes, traffic signal prioritization, and general road maintenance. Additionally, the City of Allentown’s Department of Public Works is responsible for traffic planning and improvements, enhancements to the public realm and streetscape, and road maintenance and repair. - Mention city’s role in regional trail development and high number of trail connections owned and maintained by the City”

“Integrate trails into the city-wide mobility plan and integrate into neighborhood plans. • Align with LVPC’s current bike and pedestrian planning, WalkRollLV, and prioritize implementation of the plan’s bike commuting corridors in the City and D&L Trail catalyst project connecting the City on east and west sides of Lehigh River identify priority projects for inclusion in LVPC’s planning process. • Update and continue to implement the City of Allentown Parks and Recreation “Connecting Our Community” Plan (2010) as the mobility component of the current Comprehensive Plan and integrate key projects and trails into neighborhood planning. • Become an active partner in THE LINK Regional Trail Network”

“AC2d Identify D&L Trail as a potential active transportation corridor and related trailhead as potential gateway for through travelers”`

“NEXT STEPS • Add five to seven strategically placed nodes that combine vanpool, bikeshare, bike storage, bus stops, safe pedestrian crossings and wayfinding signage by: (consider adding “connections to regional trails when possible”) • Coordinating mobility hub design with design of LANTA Enhanced Bus Service routes and stops. • Engage the Pennsylvania Department of Transportation to discuss permitting, design, and partnership. • Identifying operators of van services, understand their established routes and offerings, and coordinate connections with mobility hubs. • Identify key locations for enhanced lighting, bicycle parking, or bicycle lockers, which may align with increased office space in the downtown area. • Prioritize pedestrian access in mobility hub designs, especially considering crosswalks, signalization, and other interactions with traffic. • If electric charging is needed for cars, scooters, or other modes of transportation, ensure adequate utility loads. • Increase focus on pedestrian and bicycle safety, while emphasizing these alternative transportation modes (keep in mind that for people to commute to work through active transportation, during the winter it is dark for morning and evening rush hours so lighting and safety measures for transit stops, trails, sidewalks are important)”

“PARTNERS LANTA; Lehigh Valley Planning Commission; City of Allentown Public Works; Bureau of Planning & Zoning, THE LINK Trail Network”

“We suggest that the city take immediate action to support the implementation of micro mobility into the city structure. Micro-mobility includes bikes, electric scooters, electric bikes and more. Current projects are underway to create a regional bikeshare program, similar to the current Muhlenberg College bikeshare. Through implementation of this plan, bikes and stations will be installed and maintained by Zagster. Zagster is a venture-funded startup company based in Boston, Massachusetts that designs, builds and operates bike sharing programs for cities, universities, corporate campuses, hotels, and residential communities across the United States. As of July 2019, it operated over 200 bike sharing programs. It costs 2k - 4k up front to host a station. Donors have already been identified and are ready to move forward. In addition, with the appropriate regulatory framework, micro-mobility can be structured in a way that is financially quite advantageous to the City.”

“Supporting more workforce accessible manufacturing within the City will help to balance the issue noted in the second bullet under “public transportation is difficult to support”. Manufacturing employment opportunities should also be mentioned under “Accessibility + Connectivity is One Important Piece of a Larger Puzzle””

“Regarding the passenger rail service “bubble” text it should also be noted that the planning efforts determined that the existing land use patterns in the Lehigh Valley are not dense enough to support viable passenger rail service.”

“While the survey response may be entirely valid, I question why we would highlight a comment that would require significant involvement of both PennDot and South Whitehall Township over a comment that is more wholly within Allentown’s ability to address.”

“The City can include green stormwater infrastructure (GSI) in its traffic calming design. Philadelphia and surrounding suburbs have incorporated GSI into bump outs.”

“Is there a plan to alleviate the congestion on the roads connecting Allentown to surrounding areas?”

“There are not many options for people without cars for after shift busing from industrial parks”

“Do you have a plan to address placemaking and/or wayfinding in each city ward or district? Signage? Aesthetics? Individual identity? AC3b (wayfinding signage and branding)”

“Slow down 7th St traffic”

“Net neutrality”

“to consider to put names on all streets - especially in alleys (public safety consideration as well as wayfinding)”

“Conversion of one-way to two-way streets - will you be taking into consideration the three (3) studies already done on the subject (for 7th Street)”

“Lack of in-home internet access - seeing a big issue for immigrant families”

“concern of two-way conversion of 7th street - people driving so fast, many accidents at 7th and liberty; 7th and tilghman streets”

“Must feel safe before one can walk the city; safe walkable streets”

“More two way streets would help businesses”

“Car dependency - understanding commuting patterns”

“Highlight safe bicycle paths and lanes. Current infrastructure is like painting images of bikes in the middle of the road without continuous markings of actual bike restricted lanes (speaking as a bike commuter)”

“I meet my sister downtown everyday for lunch. The crosswalks are terrible. Cars turn right on a green light at the same time there is a pedestrian walk sign (9th and Hamilton; 8th and Hamilton)”

“LANTA Bus Routes: LANTA seems to frequently change bus routes. This inconsistency is difficult and we (library staff) need to frequently reach out to LANTA for updated route schedules.”

“Buses on Hamilton Street (old route) - getting to businesses/increases businesses”

“Issues with crosswalk/crossing Hanover Ave from Overlook park - cars don't stop/feels very unsafe; Suggestion of installing a handicap crosswalk if a stop light is not an option”

“Better sightlines for when driving across busier streets; it is very difficult to see oncoming cars where there are vehicles parked right at the corner”

“Also, we need to do better providing bus stops for our people, especially the disabled, obese, children, etc. Most of the bus stops are not catered for these individuals.”

“The seats are too small to seat on, the area is full of weed, garbage, etc.”

“We need decent bus stops.”

“There are bus stops located at very risky areas, example right off the road, with just a sign. Most of the time there is no where to stand, but on the road. Again, safety is the issue. What about when it snows, that's another issue.”



## Services & Amenities Comments

“We further recommend that the identified “next step” of considering a grant program for cultural events (listed on page 141) also prioritize requests for funding from organizations representing historically underrepresented groups.”

“Roughly 1 in 6 LGBT Pennsylvanians report rarely or never receiving the support they need.’ We recommend that this gap in service be addressed by revising the section on page 143 regarding the improvements and investments in community centers to note the importance of “enhancing existing community centers throughout the City and identifying where additional facilities are needed to support residents, particularly those who are members of historically underserved groups.”

“Change Principle 2 to read Improve Access to...” Create implies there is no current access to these services in the city.”

“There are a number of other potential nonprofit partners that were also overlooked, including North Penn Legal Services, which can help with the rental housing issues raised, or the Lehigh Valley Regional Homeless Advisory Board, which can help with those issues related to homelessness.”

“Youth. On P. 126, the plan talks about considering the youth perspective “when possible.” Love what you are getting at, but I have found in my own work that that phrasing is too easily ignored - there are always reasons it’s not possible - and would suggest instead language that says the City will make it a priority to find ways to seek and incorporate youth voices.”

“What can we do as youth to push the 2030 plan forward”

“What are you gonna do about the young homeless children & teens in allentown?”

“12-16 year olds need more options teen pregnancy housing boarding school”

“Any chance of renovating any of Atown’s old factories for a shelter or youth center instead of Loft Apts?”

“Allentown Vision 2030 Youth Advisory Council?”

“Buy-Live where you work - status/expansion?”

“Year-round shelter - we are the 3rd largest city in PA”

“Liaison/meetings/city website for neighborhood groups (include officers of groups and where/when they meet on city website)”

“Provide charging stations for phones downtown (bus stations, laundromats, parks) - especially for those experiencing homelessness/youth; most have phones but no place to charge (and library discourages phone charging)”

“Zoning issue for St. Luke’s - wants to open a temporary shelter, but due to proximity to Salvation Army, have to go for a Zoning variance; fees involved and no guarantee of approval too burdensome for church entity”

“Provide smaller scale/roving neighborhood meetings - move around the city”

“Expand ‘City gov’t 101’ - so people can know how city government functions - how to get involved”

“Annual/bi-annual neighborhood/community meetings”

“biggest challenge for accountability - informing/engaging the community; how infuse the development process (optimism/vision) - what needs to be done to support plan implementation; how keep community engaged and informed”

“Create a millennial task force - skill building/engagement”

“Inclusivity - not getting same opportunities, blockages of pathways to success”

“There is a skepticism in interacting with the city - feeling welcome and included (people in the city are the city)”

“Need trusted and credible communicators from the city”

“Need early adopters and trusted advisors - how you get change - people taking time and showing up - need to show them change is happening”

“How do you identify partners and funding resources? Who are the partners?”

“Land Bank - could use for neighborhood community centers”

“Bansacer - Baltimore Urban Housing initiative (happening at St. Lukes campus in Baltimore)”

“Services and amenities: Add youth development within pre-k and community centers improvements and investments”

“existing arts organizations are positioned to expand/host/lead programming. Please think of the Baum School!”

“Perception of safety - could there be a role for community ambassadors”

“People with disabilities - physical and attitudinal - issue of curb cuts (done improperly/inaccessible) - Allentown Parks & Rec have been great with accessibility”

“Youth - lack of available places to go and hangout”

“Homelessness; mental illness (issues); Amazon/Fedex employment needs to be watched”

“how is nonprofit community considered in plan - ability to thrive in the city is key”

“Concern - Casa not seeing much change in the neighborhood; fixing what is there - there are things that city can do”

“Services and Amenities - Principle #1 - replace ‘support’ with ‘develop’”

“Would like to see more pharmacies close by and/or offering home delivery of medications; would like to see a supermarket, bank, restaurants, 24-hour urgent care center closer (currently airport road is the closest for many of these resources)”

“Supportive services for the homeless”

“Want to see a different format for neighborhood groups - currently very crime-focused; want to see as being welcoming and inclusive”

“Principle #2 - Access... Too many thoughts in one sentence - should simplify/ separate focus areas - essential services vs ‘nice to haves’”

“What is the direction/focus of the homeless support/services - focused on mental health, employment, housing?”

“Homelessness crisis - what is the proper role of the City? Can you get buy-in from partners; veteran homelessness; role of faith-based groups”

“Principle #4 - Allentown has long been a diverse city - but has been inclusive - Add ‘inclusive’ and ‘welcoming’ to principle text”

“Sa2a should specifically include CACLV as a collaboration partner as they have had continuous direct involvement with the local banking industry particularly when dealing with equitable access to financial institutions.”

“The additional long-term impacts of SRO’s should be reviewed before evaluating any zoning changes. Does the San Diego example include other types of supportive care as part of their initiative?”

“The mixed-use overlay district discussion in the plan does not identify that there already exists the Traditional Neighborhood Overlay. Would the proposed overlay replace the TNDO overlay?”

## Living Systems Comments

“we recommend that, on page 152, the statement underneath the principle to improve community health outcomes be revised to read, “The design of a city and access to services within that city can determine health outcomes for residents. The City of Allentown strives to provide the foundation of a healthy community through ensuring safety, access, and health equity are addressed.””

“While the sections of the report pertaining to improving health outcomes acknowledge the environmental and physical barriers to health, they do not fully acknowledge the social and cultural barriers. Nearly one-third of respondents surveyed in the 2018 Pennsylvania LGBT Health Needs Assessment reported that their healthcare provider was slightly or not at all LGBT-competent. We recommend that a goal to ensure that neighborhood health centers offer non-judgmental, LGBT-inclusive healthcare be added on page 154 of the report.”

“text on the page is identical to a page in Chapter 1. Topics do overlap and intersect with Economic Development, but the connection could be made stronger.”

“first sentence of second paragraph does not make sense. Please clarify.”

“EcoDistricts Protocol is not defined elsewhere in the document. Consider clarifying or removing.”

“the Lehigh Valley Hazard Mitigation Plan is incorrectly cited in paragraph 2 of LS1a. Please revise.”

“consider putting bullet points in the same order they are listed in the paragraph to better align what issue each bullet point is meant to address.”

“pluralize “Health Center” in the title if the city wishes to support creation of multiple sites.”

“the Lehigh Valley Hazard Mitigation Plan is incorrectly cited in paragraph 2 of LS3c. Please revise.”

“what “cohort” is being referred to in paragraph 4?”

“Promote wellness programs that advocate outdoor exercise to address both physical and mental health. (Note: SLUHN and D&L have the Get Your Tail on the Trail program available regionally and Wildlands and LVHN hold Get Out! Lehigh Valley hikes, both of which have held events within the City but would be able to do more if requested.) “

“Consider documenting the amount of naturalized area and riparian buffer acres that Allentown owns and maintains because this relates to CITY AS A STEWARD. However, we have seen the City struggle to keep employees educated through staff turnovers on how to maintain riparian buffers and not waste the grant funding that went into creating them so we would suggest adding a NEXT STEP like “Hold periodic training for parks and public works staff about best practices for developing and maintaining green infrastructure” or change the bottom existing bullet point to “Engage and educate City staff and the community in good stewardship practices which reduce pollution from residential properties, public land, and activities””

“LS4a sentence 4 - Parks can also serve some transportation needs by creating walking and biking trails throughout them and to connect them to other parks and destinations. “

“NEXT STEPS • Build on the existing and planned greenways and bike/pedestrian trails that follow the Little Lehigh Creek, Jordan Creek, Lehigh River and abandoned railroad right-of-ways to encourage a vision for a network of interconnected spaces • Align with LVPC’s WalkRollLV planning process and THE LINK Trails Coalition goals”

“PARTNERS - instead of D&L Trail, please say Delaware & Lehigh National Heritage Corridor because our organization would be the partner rather than the Trail - feel free to list THE LINK Trails Coalition also”

“a thorough and aggressive climate action plan would align Allentown with Pennsylvania’s 2018 Climate Action Plan as well as the Lehigh Valley Planning Commission’s climate action goals developed in 2014 as a component of the regional comprehensive plan which is now being updated by the LVPC in FUTURELV. It would also align Allentown with cities across the nation and in the Lehigh Valley which are moving forward with climate action planning.”

“The City’s proposal to place the climate change section under the Living Systems chapter is acceptable to the Allentown EAC. However, the last sentence of the goal under Living Systems needs to state a commitment to net emissions neutrality and should be broadened to include businesses and nonprofits. Following is our recommended wording (new wording underlined): “In Allentown we will continue to take steps to reduce our carbon footprint and will achieve net emissions neutrality by 2050 at the latest through aggressive actions that include reducing our energy usage and increasing solar and other clean energy choices, increasing the use of mass transit and micro-mobility, increasing the availability of locally grown food, and enhancing the natural environment, as well as encouraging and connecting residents, businesses and nonprofits to opportunities to do the same.””

“There should also be a clearer explanation of how the Living Systems goal aligns with Allentown’s vision. The explanation on page 149 of the Draft Plan is focused on Economic Development rather than Living Systems. The discussion on page 149 should be revised to discuss instead the health, environmental and economic benefits of high-quality Living Systems and should include a discussion of the importance of taking prompt, proactive measures to address the variety of significant impacts climate change will have on Allentown absent such measures. These effects would include increased vector-borne diseases due to higher temperatures and precipitation in the Lehigh Valley, increased food shortages, increased flooding, increased sewage overflows, increased home energy bills for cooling, and increased heat-related mortality.”

“With regard to steps needed to achieve the climate component of the Living Systems goal, we wholeheartedly agree with the next steps stated on page 151 of the Draft Plan which include preparing a climate action plan that integrates with regional plans, collaborating with local universities and schools to conduct research and engage citizens in the solutions, pursuing grant moneys, and partnering with the Allentown EAC to further define the Climate Action Planning approach. We believe, however, that work on climate action planning must begin right away. We recommend adding the word “immediately” in front of at least the second and fifth bullets on next steps (collaborating with universities and schools and partnering with the Allentown EAC on climate action research and planning). We also request that the Allentown EAC be included in the zoning review as proper zoning is integral to climate action as well.”

“we believe that development of a climate action plan and a resilience plan should either be included as Catalytic Actions in this chapter [living systems], or should be stated up front as foundational Catalytic Actions along with the zoning review and neighborhood planning. Climate action planning fits squarely within the definition of Catalytic Actions stated on page 34 of the Draft Plan: “Catalytic Actions are broad, structured programs or policies that will impact multiple Urban Systems. Implementing these actions will make the largest impact on Allentown, and have the potential to shift the way the city develops.”

“The fourth bullet under next steps needs to be done very carefully as redevelopment is already typically more expensive than developing on greenfield sites. We need to make sure that we do not create additional unintended disincentives to redevelopment with any new regulations.”

“Energy Star certified buildings may deliver better overall performance with less upfront cost to the developer than LEED so it should at least be reviewed and mentioned here.”

“Under Ls4b the last sentence should be rewritten to make it clearer that Allentown does not have combined sewer system common to many cities but does have volume and quality storm water issues.”

“Is4c the second bullet under Next steps should also list arsenic which is very common in coal ash and is found in throughout Allentown soils due to our historic use of coal as a residential heating source.”

“While size of the vacant lots is not discussed it should be clarified that only small or lots that have no other development potential should be considered for community gardens. Alternatively, community gardens could be used as an interim land use but should not supplant future uses or redevelopment with larger economic benefits.”

“The city has a dedicated, stormwater Utility Fund which may be used for green infrastructure planning and installation. Technically, a “Green Infrastructure Fund” does not exist. This title should be changed.”

“The following sentence needs to be changed. The reference to a “combined sewer overflow” is not relative to Allentown. From, “Allentown’s primary challenge is the quality and quantity of water discharged to creeks, streams, and rivers, as opposed to combined sewer overflow.” To, “Allentown’s primary challenge is to control the quantity and to improve the quality of water discharged to creeks, streams, and rivers.”

“The following sentence needs to be changed. The word “increase” should be replaced by “conduct”. Although it is a goal to increase public outreach, our requirement is to have a program which includes outreach activities, not to increase them. From, “The city is required to inspect the system, reduce pollution and sediment, increase public education, and to monitor and enforce rules preventing industrial site discharges.” To, “The city is required to inspect the system, reduce pollution and sediment, conduct public education, and monitor and enforce rules preventing industrial site discharges.”

“The third paragraph can begin with the sentence “The City plans to develop a Watershed Restoration Strategy to identify pollutant sources and causes of stream impairments. As part of this plan,” the city can integrate green infrastructure into the neighborhood planning processes to address the community’s desire for better water quality...”

“Allentown has a responsibility to its residents to set forth both mitigation strategies to reduce the impacts of climate change and adaptation strategies to adequately prepare for its impacts and these are the right moves for us to be making as a community. These investments will not only improve the quality of life for all residents but also provide cost savings in the long run.”

“As part of the climate action and resilience plan, I also ask that the City of Allentown establish a near-term goal of 100% renewable energy for its municipal operations, which would help set Allentown on the path towards 100% renewable energy community-wide by 2050.”

“Allentown’s Climate Action Plan in this document is generally written without specifics which means the hard work is ahead for city staff to tease out the planning and programs needed to implement these ideas. And to figure out priorities and costs. The job will be overwhelming.”

“Further, the consultant does not address the consequences of potentially radical weather changes, such as heavy rains and winds, that might affect city services and resident safety. These services might include drinking water or sewer facilities, and storm water management structures, street cleaning costs, etc. These functions should be recognized as needing considerable upkeep investments and or possibly incurring substantial damage costs with more turbulent weather. However, NYC found that the investments in these areas gave the city business opportunities which benefited its economy. See “Climate of Hope” by Michael Bloomberg and Carl Pope.

“Secondly, since A-town is expected to grow in size, more people, more pollution, it could plan to counter balance that growth with real reductions in CO2 with stringent energy efficiency standards for lighting and heating for its new buildings or retrofits. Again that’s what they did in NYC starting about 20 years ago. For Allentown’s strategy, Vision 2030 might want to recognize the need for and costs of funding that will be necessary to implement these programs.”

“Climate: I echo and second the comments of the EAC, especially around the immediacy needed for such a plan, and would add that specific language around racial and economic equity will be important here as well.”

“Nice job but... It’s frankly irresponsible to plan for the next 10 years without specifically addressing the need to rapidly decarbonize. I appreciate there are pieces of that here, but it’s not listed as a priority. Does the city commit to developing & implementing a climate action plan?”

“More rules about quiet hour enforcement”

“Will there be more parks and playgrounds?”

“How are you going to make the community safe for the children in this generation?”

“There is a lot of negativity about violence How can we partner with the police more to be helpful?”

“What are you gonna do about the mental health state of Allentown.”

“Well-lit walking paths in Jordan Park/paved pathways”

“Provide more play areas for kids - parents on 7th Street won’t let kids cross street to play in Stephens Park - build more playgrounds on former school sites (when schools close in 2020)”

“Consider trees/urban forest in the ‘Living Systems’ chapter; challenges in maintaining street trees - have trees dying and branches breaking off and causing a significant hazard for residents and incurring large costs for property owners; particular issue - 11th and Washington Street - had branch break off and had to close street to remove w/ chainsaw”

“We have a well-respected FQHC in the area. They are a known, culturally appropriate entity. This sounds like something less.”

“Are we saying anything explicit about how the built environment can help to encourage physical activity and thereby decrease obesity, diabetes, etc.?”

“Parks not only play a role in preserving the health of the environment but they also represent the social health and heart of the city. Pittsburgh Parks Conservancy is working towards using parks connecting different ethnicities to the land and may be a good example diversity ecologically and socially”

“We also need a: neighborhood mental health center; school-based health center (best practices?); “a city that sits within a garden/park natural space.”; all looks really good - great job on engagement!”

“Building performance monitoring (EPA Portfolio Manager)”

“Parks providing stormwater management; Allentown as a ‘city within a park’”

“Stormwater info campaign for residents draining pools, soap, and other sources directly into roadway/drains”

“Safety of parks is an issue - issue with drugs and vagrancy (Arts Park)”

“Robert Wood Johnson Foundation provides community health metrics for all PA counties - looks at health factors and health outcomes”

“For Overlook park community center - would like to see a food bank; community center resources; health clinic”

“concerned about air quality; like the noise pollution mitigation study and effects on birds”

“Encourage native plants/pollinator habitats in gardens/greenspaces”

“How addressing invasive species? Lanternfly issue - refer to PA Dept of Ag and USGS”

“more street lighting everywhere”

“I am very concerned of the children crossing Summer Avenue into Jordan Park. This is a very busy area and I’ve seen children trying to cross the roads in between moving vehicles”

“There is a park right off a Summer Avenue and there is no consideration as to the safety of the children in that community. Something has to be done.

I suggested a covered ( for safety) pedestrian bridge.”

“Also, the City should be more aggressive towards the business owners along Summer Avenue - esp the car garages. They need to keep the sidewalk clear for pedestrian, and not leave their cars park on the sidewalks. I’ve noticed a parent walking with her kid, trying to maneuver between the cars park on the sidewalk, and the moving vehicles on the street.”

“We also need to beautify the area of Summer Ave, esp. the area leading towards the junction of American Parkway and Summer Avenue. There are bushes and garbage everywhere.

Our focus should not only be on downtown Allentown. We need to beautify the area leading to downtown.”



## Areas of Allentown Comments

“East Allentown and/or Center City sections should mention the importance of revitalizing the Lehigh Canal Park area to create an alternative transportation corridor between Allentown and adjacent communities to the north and east as part of the D&L Trail on both sides of the Lehigh River.”

“The McKinley and Cleveland School Lots: The lots on which the old Cleveland and McKinley schools are located should be acquired by the city and made available to developers based on the competitiveness of their development proposals for mixed income housing. This will put the properties on the tax rolls and attract residents with money to stimulate additional economic stimuli.”

“Priority Blocks: While there are countless blocks lined with housing in disrepair, there are extremely limited funds available to improve the housing stock. In the neighborhoods surrounding the Neighborhood Improvement Zone it is difficult to attract home buyers, in part, because purchasing a home in the downtown is not a good investment. A strategy developed by Upside Allentown, called “priority blocks,” asserts that investing in a critical mass of properties on a single block located in close proximity to other safe investment areas like the NIZ or the two properties on which Cleveland and McKinley schools are located, will result in safer investment in between. This model, that looks like a dumbbell when drawn on paper, has been tested in south Bethlehem and has proven to be successful enough to be tried in Allentown. This strategy could prove to be very successful in the neighborhood between Seventh and Twelfth streets and Linden and Gordon streets. Along with the proposal for the two school properties recommended above, we have the potential to make a dramatic improvement in that neighborhood. CACLV is already testing the concept, choosing the 200 block of North Tenth Street, where we are improving eight properties.”

“This page and several other pages continually use the words “light industrial” this can potentially have limiting effects or expectations on future uses. Industrial or manufacturing would be more appropriate words offering broader uses. We should not continue to use what some may consider an apologetic attitude for being a community of makers.”

“Under development density the last marginal section “small lot dwellings, alleys” front yards could be considered for shrinking as well as this provides better walkable attributes and front yards really don’t provide much usefulness to the public or property owner.”

“The area shown along Quebec st. as a redevelopment area on the map on page 171 is one of only two viable areas in the City that have the potential of expanded rail freight services. This should be evaluated for industrial use rather than “light” industrial use. Naturally, truck traffic will need to be directed to the center (probably an upgraded Quebec st.) of the redevelopment area to avoid conflicts with the adjacent homes along Sherman St.”

“industrial zones or land uses are not depicted on these maps. The roads and rail line types under the base layers key do not show up on the map.”

“The residents also have access to manufacturing jobs in the City as well as regional employment centers.”

“This simply does not reflect AEDC’s vision of this corridor and we are the single largest property owner within the corridor. We need to discuss revisions to this section.”

“Accessory dwelling units may have potential but need to be studied carefully.”

“Same comments on the mapping as on page 184.”

“While I think I understand the home ownership map and legend I am not sure it is as clear as it could be.”

“Same comments on the mapping as on page 184. Also, there are areas along the former Lehigh Valley Railroad in West Allentown that were formerly manufacturing. This would be a good place to use “light manufacturing” as a potential land use for some of these former industrial parcels.”

“Under revitalizing the center: “PPL Arena” should be changed to “PPL Center” or “PPL Center” arena.”

“Using a photo of the Nueweiler next to the “Challenges Remain” heading implies that there has not been any investment in this project. The City and AEDC have invested nearly \$750,000 in this property and Brewers Hill Dev. Company has already invested more than \$1 million so either the photo or the text should be revised.”

“The references to other sections need to be populated.”

“The references to other sections need to be populated. Since previous sections suggest performance-based code enforcement we should tie that into the text under the equitable code enforcement. Perhaps add “performance based” following “well intentioned””

“The NIZ development number needs to be populated. The average reader is unlikely to understand the use of the term “third space””

“Same comments as on the previous maps regarding the base layers legend not appearing on the map itself”

“There are a few areas that I have always believed had unrealized potential. One is the riverfront along the Lehigh River. That long awaited project that is finally getting started, but I think a key part of its success is to make it a place where social things happen. Something like what they do at Steel Stacks in Bethlehem or Penn Landing in Philadelphia would make it a destination for fun. I’ve always felt that if you can then find a way to develop the area between the revised downtown arena area with the riverfront development, that lower area of downtown would thrive.”

“Another area that I feel is a missed opportunity is the Union Terrace pond area. The terraces, that are already in place in that small park would make a wonderful small community free concert venue. Something in the line of what they do at the Levitt Pavilion in Bethlehem, but on a smaller scale. Guests bring their own chairs or blankets for seating on the terraces. A small stage can be positioned on the other side of the stream (between the stream and pond) and you’d have a nice weekend afternoon or evening place to relax and listen to some music. Perhaps limiting the venue to acoustical acts would make it more acceptable to the families in the adjacent neighborhoods. If you could then find a way to connect up that Union Terrace venue with the Muhlenberg Lake park, with some kind of green space, you’d build on what you already have going with the Rose Gardens and the pars on both sides of Ott St., providing a really nice family friendly outdoor activities area. I think it would increase the business in the restaurants along Hamilton St. as well.”

“The last one is the area just south of Union Terrace where St Elmo St meets Martin Luther King Blvd. That wooded area could become something that could then also tie it to Union Terrace, just down the road, and link the west end venues mentioned above to the Lehigh Parkway. Perhaps finding a way to spruce up that part of St Elmo St to make it an alternative connector between the Lehigh Parkway and the Union Terrace, Muhlenberg Park, Rose Garden, etc., would be a key part of making all of those parks connect.”

“I messaged before concerning an observation tower however, a thought came across my mind while walking home today... What about the addition of a Clock Tower as well? Something lower than an observation tower, something iconic to the city... perhaps a large scale replica of the vintage steel clock located near Starbucks on 7th St. directly near the Soldiers and Sailors Monument!

“One more thought would be converting the Toys R’ Us into the Allentown Botanical Garden (welcome to the public of course)! My thoughts are that when people go out to eat on Grape St. or The Lehigh Valley Mall they have no where to enjoy a park close by, a public Botanical Garden ran and funded by the city would be best for the citizens of Allentown!”

“Fairgrounds planes & details.”

“I’m curious to hear more information on the Waterfront Project.” “Are there any plans that you are aware of regarding ground breaking for a Jordan skatepark?”

“Are there any plans that you are aware of regarding ground breaking for a Jordan skatepark?”

“Plans for ASD 2 (soon to be vacant) buildings - McKinley and Cleveland”

a grocery store in East Allentown”

“A grocery store near 4th and walnut”

## Other Comments

“Grammar, phrasing and spelling should be thoroughly reviewed throughout the document.”

“Spell out acronyms such as CDC (Centers for Disease Control) if not already spelled out on the same page or sub-section.”

“Reduce the amount of technical language to make the plan easier to read and understand.”

“Intro paragraphs for each section should be a larger font - right now, they disappear into the background too much.”

“Focus more on the potential impacts of programs rather than describing what a program is and how it works.”

“Consider revising the formatting of the Catalytic Actions to make it clearer that they are different from the regular Principles, Sub-principles and Next Steps.”

“Do a thorough review of the Comprehensive Plan requirements in Section 301 of the Pennsylvania Municipalities Planning Code to make sure that every requirement is reflected in the plan.”

“The LVPC recommends adding some language tying [the living systems] chapter’s Principles in with those of previous chapters - clarifying that environmental considerations are important in each aspect of planning.”

“Our Young People: It is odd that the plan looks ten years out but says so little about our youth, especially when the violence in our city can wreak havoc and set back our best economic development efforts. Our kids really are our future and much more needs to be said about how those kids will fare in a competitive labor market.”

“indicates that industrial development = large trucks but there is no mention of freight rail”

“How does one go about obtaining the properties being taken back by the city”

“How much was accomplished from the last action plan?”

“Will HARB update the materials we can use in Old Allentown?”

“City admin jobs some of the highest paid in the city; there needs to be a residency requirement”

“Inclusion AND diversity - elevate inclusion”

“Clarification - what are we calling ‘actions’ in the Plan”

“Create a pipeline... - next step of ‘partner with institutions’ - what does partnership look like?”

“Create a city app for supporting projects - include Vision 2030 follow up; create a reporting app”

“Overall came out really well - looks really good, there are areas of improvement but should focus on implementation; excellent strategic framing document; not a bureaucratic document; power of document beyond value of content - an accountability tool”

“Create a city app for supporting projects - include Vision 2030 follow up; create a reporting app”

“The Vision 2030 uses high level language - make accessible; how to understand the systems”





