



Lehigh Valley Planning Commission

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October 10, 2025

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

**Re: Penn Square Flats – Land Development
City of Allentown
Lehigh County**

Dear Ms. Gomez,

The application proposes the construction of two, four-story apartment buildings consisting of a total of 190 dwelling units and 299 parking spaces, located at 836 Constitution Drive (Parcel Identification Number 640668808808). Access driveways will be located on Constitution Drive and East Wyoming Street. The project was previously reviewed by the LVPC in May 2019 under the same name.

Site Suitability

According to the Natural Resources Plan in *FutureLV: The Regional Plan*, portions of the project site are located in the Lehigh Mountain natural area, a Natural Heritage Inventory Core Habitat of local significance. These areas contain natural resources that are important to conserve, restore or enhance such as critical habitats, woodlands and steep slopes.

The LVPC notes the presence of both woodlands and steep slopes on the subject parcel. To 'minimize environmental impacts of development to protect the health safety and welfare of the public' (of Policy 3.2), any development activity should 'maximize preservation of woodlands and critical habitats' and 'preserve natural resources in the land development process' (of Policy 3.1). For steep slopes of 15%-25%, the LVPC recommends that large lots with low site coverage standards should be maintained, and special erosion and storm drainage controls enforced.

Natural Heritage Inventory Core Habitats of local significance, woodlands, and steep slopes are all considered Medium Priority Conservation areas. *FutureLV* recommends that these areas should be used by conservation organizations and government agencies to prioritize conservation efforts. As such, the City should carefully weigh the impacts of development on natural resources with the need for attainable housing.

Housing

The proposed development supports efforts to alleviate the regional housing shortage. According to the Lehigh Valley Housing Dashboard, Allentown is experiencing a shortage of 1,918 housing units today, and an additional 5,318 units are needed by the year 2050 to keep up with the City's anticipated population growth. The proposal helps meet the City's housing demand while increasing attainable housing opportunities (of Policy 4.5). More information about housing in Allentown and throughout the Lehigh Valley is available at lvpc.org/housing.

Electric Charging Spaces

Recognizing the rapidly expanding need for renewable energy sources and the advancement of autonomous and electric vehicle technologies (of Policies 2.5 and 3.2), the LVPC recommends electric vehicle charging infrastructure be included in the proposal.

Sustainable Systems

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'minimize environmental impacts of development' (Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing.

Stormwater Review

The project site is located within the Little Lehigh Creek watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments related to our review of the project's stormwater management plan are included as attachment 1.

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Sincerely,



Mary Grace Collins
LVPC Community Fellow

cc:
Statewide Partners, LLC, Applicant;
Mike Roth, Pennoni Associates, Project Engineer/Surveyor;
David Petrik, Deputy Director of Public Works;
Jesse Sadiua, Chief Planner;
Melissa Velez, Senior Planner;
Brandon Jones, Planner

ATTACHMENT 1

Act 167 Drainage Plan Review

October 10, 2025

Re: Penn Square Flats
Plans Dated August 8, 2025
City of Allentown
Lehigh County

The proposed storm drainage concept presented in the plans dated August 8, 2025 and storm drainage calculations dated August 12, 2025, has been reviewed for consistency with the *Little Lehigh Creek Watershed Act 167 Storm Water Management Ordinance*, June 1999. A checklist of the Act 167 review items is attached for your information. As indicated on the checklist, each item of the Drainage Plan has been reviewed for consistency with the Act 167 Ordinance. A brief narrative of the review findings is as follows:

The proposed development is located within drainage district 226 of the Little Lehigh Creek Watershed as delineated in the Act 167 Plan. As such, the runoff control criterion for the site is Conditional No Detention. Additional impervious cover may be discharged without detention controls provided capacity is available to the main channel. Otherwise, a 100% Release Rate is required. Based on review of the plans and calculations, the following deficiencies are noted. The overall pre- and post-development drainage area boundaries need to match both on- and off-site. The off-site drainage area EDRA-1A is not included in any stormwater runoff calculations for pre- or post-development, but it should be included in the routings to ensure the basin will have enough capacity for the off-site runoff captured by the on-site stormwater conveyance system. Additional areas south of the property also appear to drain onto the site and to the basin and need to be included in the analysis. The soil types used in design for on- and off-site areas should be from the provided Web Soil Survey Soils Map, which includes both A and B hydrologic soil groups. Regarding the Peak Runoff Summary Table, the actual release rates resulting from the design should be calculated, rather than the exceedance over the allowable rates. The pre- and post-development drainage area boundaries should be more clearly shown on the drainage area plans. Clarify the woods delineation for pre- and post-development as there is an inconsistency in the line type used. Clarify the land cover that is gravel and what is asphalt in pre-development. The infiltration testing has not been conducted, so the exfiltration rate of the infiltration basin cannot be verified. The overall pond outflow for the 10–100-year return period storms should match the primary maximum outflow under the device summary. The capacity of the stormwater conveyance system to the infiltration basin should be included in the stormwater report. The infiltration basin needs a spillway and freeboard calculations to match Ordinance requirements. A durable level surface is required to ensure the level spreader functions as intended. Therefore, the Drainage Plan has been found to be inconsistent with the Act 167 requirements.

Note that only those details of the Drainage Plan included on the checklist have been covered by this review. Therefore, notable portions of the Drainage Plan not reviewed include any aspect of the post-construction storm water management plan concerning water quality, the details and design of any proposed water quality BMPs, the Erosion and Sedimentation Control Plan and the details of the runoff collection system (piping). These items are reviewed by the municipal engineer and/or others, as applicable.

Once the outlined issues have been addressed, the revised plans, completed application form and appropriate review fee will need to be resubmitted to our office. Please call with any questions regarding these comments.

Sincerely yours,

A handwritten signature in blue ink that reads "Geoffrey A. Reese". The signature is written in a cursive style with a large initial 'G'.

Geoffrey A. Reese, PE

Master Planner and Engineer

A handwritten signature in blue ink that reads "Denjam Khadka". The signature is written in a cursive style with a large initial 'D'.

Denjam Khadka

Senior Civil/Environmental Engineer

Attachment

LVPC ACT 167 REVIEW CHECKLIST

Development Name: Penn Square Flats Watershed: Little Lehigh Creek
Municipality: City of Allentown Reviewer: Denjam Khadka
Date: October 10, 2025 Checked by: Geoffrey A. Reese, PE

Ordinance Reference	Item	Consistency w/Ordinance			Comment
		Yes	No	N/A	

301.A-G. General storm water management requirements		X	/	/	
H. Consideration of volume controls.....		/	X	/	Consideration preferred, not required.

302.A,B. Applicable Storm Water Management Provisions

Subarea(s)	226			
Criteria	CND			

Criteria Key: RR = release rate; CND = conditional no detention

303.A. Design consistency with applicable provisions from 302.A. and B.....	/	X	/	See Attachment 1 for details.
B. Mapping of Storm Water Management District Boundaries	X	/	/	
C. Downstream capacity analysis	/	/	X	
D. Multiple discharge points within a single subarea.....	X	/	/	
E,F. Multiple discharge points within multiple subareas.....	/	/	X	
K. Documentation of no increase in peak or volume	/	/	X	
L. Documentation of "no harm" downstream.....	/	/	X	
M. Regional or subregional detention analysis	/	/	X	
N. Capacity improvements analysis	/	/	X	

304.A. Computation method (rational or soil-cover-complex)	X	/	/	Soil-cover-complex method used.
B. Verification of detention design by routing.....	/	X	/	See Attachment 1 for details.
C. Minimum detention pond freeboard specifications	/	X	/	See Attachment 1 for details.
E. Soil-cover-complex method design rainfall	X	/	/	
F. Rainfall intensities for rational method.....	/	/	X	
G. Curve Numbers for soil-cover-complex method	/	X	/	See Attachment 1 for details.
H. Runoff coefficients for the rational method	/	/	X	
I. Volume control storage volume.....	/	/	X	
K. Common time of concentration	/	/	X	
L. Manning equation to calculate watercourse capacity	/	/	X	

403. Drainage Plan Contents	/	X	/	See Attachment 1 for details.
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