

**COUNTY OF**



**ALLEGHENY**

**SARA INNAMORATO**  
COUNTY EXECUTIVE

August 22, 2025

Jim Price, Borough Manager  
Crafton Borough  
100 Stotz Avenue  
Pittsburgh, PA 15205

**RE: Crafton Borough - Proposed Comprehensive Zoning Ordinance Update**

ACED File #: 25065-OR

Mail Date: July 25, 2025

45 Day DL: September 9, 2025

Dear Mr. Price:

The Planning Division of Allegheny County Economic Development (ACED) has reviewed the aforementioned matter pursuant to the Pennsylvania Municipalities Planning Code (MPC). As a result, the County offers the following for your consideration.

## **GENERAL OVERVIEW**

The proposed amendment is a comprehensive update to the Crafton Borough Zoning Ordinance. Specifically, it encompasses the following sections: Article I: General Provisions; Article II: Zoning Districts; Article III: Conditional Uses and Uses by Special Exception; Article IV: Generally Applicable Regulation; Article V: Signs; Article VI: Nonconformities; Article VII: Administration and Enforcement; and Article VIII: Definitions.

## **COMMENTS**

Upon review of the ordinance, the following comments are offered for your consideration:

1. We recommend that certain language always be taken verbatim from the Pennsylvania Municipalities Planning Code (herein MPC) or cite specific sections of the MPC, rather than paraphrase. We have found several sections where language appears to paraphrase or not completely carry over the full text from the MPC, and we encourage the Borough to review these sections carefully to ensure that it is consistent with the language in the MPC. These sections include:

- a. Section 225-26(A)(6), regarding the “last hearing” on a conditional use. Compare with Section 913.2(b)(1) of the MPC.
  - b. Section 225-26(D), regarding the extension of a conditional use, should specifically reference Section 915.1 of the MPC, concerning the stay of proceedings, or Section 225-58(0) of this Chapter.
  - c. Language equivalent to Section 225-58(G)(2), regarding the jurisdiction of the Zoning Hearing Board to hear challenges to the validity of land use ordinances raising procedural questions, was deleted from the MPC by Act 39 of 2008.
  - d. In Section 225-66, regarding amendments to the zoning ordinance and zoning map, it appears to reference itself in subsection (B) instead of referencing Section 225-67, Landowner curative amendments. Additionally, there appear to be no provisions for municipal curative amendments as provided for in Section 609.2 of the MPC.
2. We note that several provisions of the proposed ordinance are better contained in the Borough’s Subdivision and Land Development Ordinance (SALDO). Under Article IX of the MPC, the instrument for relief from provisions of the Zoning Ordinance are variances, reviewed and acted upon by the Zoning Hearing Board. However, the standards for approval of a variance are high, as established in Section 910.2, whereas the standards for a modification or waiver from the SALDO are lower. Many technical design standards that could be met through alternative applications may meet the standard for a modification but would not meet the standards for a variance, and appeals to the Zoning Hearing Board potentially complicate administration and enforcement of criteria related to design. Sections of the proposed ordinance that may be better suited for inclusion in the SALDO include:
- a. Section 225-31 Yard landscaping and buffering.
  - b. Section 225-33 Parking lot landscaping.
  - c. Section 225-34 Steep slope and subsurface conditions.
  - d. Section 225-35 Outdoor lighting.
  - e. Section 225-37 Off-street parking design.
  - f. Section 225-38 Commercial off-street loading and unloading facilities.
  - g. Section 225-39 Building design standards.
  - h. Article V Signs.
3. We note that the Borough is meeting its community development objectives established in Section 225-3 by working to implement *Crafton-Ingram Thrive*, the Borough’s multimunicipal

comprehensive plan with Ingram Borough. Efforts taken include changing the existing C-1 and C-2 Commercial districts to Mixed Use (MU) and Crafton Transit-Oriented (CTOD) districts, respectively, and by expanding housing choice in these and the Borough's residential districts by increasing allowable uses, and a mixture of uses, and by reducing minimum lot standards. The elimination of minimum lot standards in the MU and CTOD districts preserve the existing walkable context of much of the Borough's commercial center and allow compatible infill while encouraging denser redevelopment opportunities where they were previously not permitted.

4. In Section 225-14, we note the renderings as it relates to lot and yard criteria. The Borough may wish to expand upon these renderings to include an evaluation of different types of lot scenarios.
5. The renderings included in Figure 225-20-A and 225-20-B regarding permitted projections, required yards, and front facade recessing are excellent representations of the criteria that the Borough is seeking to establish here.
6. In Section 225-28(A)(6) as it relates to apartments in a commercial building, does the requirement of "two means of egress provided" from upper-floor apartments include the provision of a fire escape? This should be specified.
7. In Section 225-28(A)(7), it appears that the language may be incomplete.
8. In Section 225-28(F), regarding commercial recreation uses, we recommend that the municipality consider breaking out more specificity with this use, especially given the exceptions listed in the definition of "Recreation, Commercial" included in Article VIII. What uses are the Borough seeking to regulate with these standards?
9. In Section 225-28(O), we believe the text should read "Gasoline/Fuel Service Station", consistent with the definition included in Article VIII.
10. In Section 225-28(Z), regarding temporary uses or structures, this is a topic that should be carefully re-evaluated on a regular basis to ensure that the intent is met related to duration. The Borough may also wish to consider establishing a period in which an expired temporary use or structure cannot be re-established, in order to avoid temporary uses becoming essentially permanent through the approval of multiple permits back-to-back-to-back.
11. In Section 225-29(I), regarding boats and recreational vehicle storage, this is a topic that often generates significant neighbor complaints. We recommend that the Borough carefully re-evaluate this provision on a regular basis to ensure that complaints are minimized and that ordinance standards are appropriate.
12. In Section 225-32, regarding fences, walls, and screens, we recommend that the Borough be clear with respect to the location of fences, including the height, in the street-fronting side yard of a corner lot.

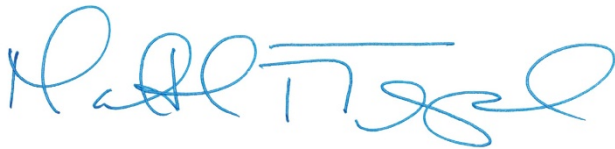
13. In Section 225-36, regarding off-street parking requirements, we commend the Borough for reducing minimum parking standards and introducing parking maximums to reduce the amount of off-street parking required overall. This matches well with the revision to the former Commercial zoning districts and the walkable nature of much of Crafton's built environment. Because of the significant reduction in parking categories, however, we do recommend that the Borough re-evaluate these standards on a regular basis to ensure that they are producing the desired results.
14. In Section 225-36(F) and (G), it appears that the text is missing specific standards.
15. While in general we recommend that sign regulation be moved to the SALDO, we are concerned that the requirement in Section 225-42(I) for the removal of signs from a discontinued or vacant business may not meet the strict scrutiny established by the United States Supreme Court in *Reed v Town of Gilbert* regarding the regulation of signs based upon their content. We recommend that the Borough solicitor review this section to ensure it is consistent with case law.
16. In Section 225-69, regarding definitions, we offer the following comments:
  - a. On page 113, "Brewery, Micro" and "Catering Business" should be bolded, consistent with the rest of the Section.
  - b. On page 116, with respect to the definition of impervious surface, we recommend that there be language that the Borough engineer shall have the final determination with respect to what counts as pervious or impervious.
  - c. On page 119, with respect to Figure 225-68-A, example lot line types, this is a good resource and the Borough should consider expanding upon these renderings if warranted in the future.
  - d. On page 127 with respect to definitions related to street, we recommend that the Borough prepare a list identifying all of the streets by arterial, collector, local, and cul-de-sac. This list should include public and private streets.
  - e. On page 128, it appears that the definitions for "Structural Alteration", "Structure", "Subdivision and Land Development Ordinance", and "Substantial Change" appear to be indented further than other definitions. Additionally, there should be a blank line before "Subdivision and Land Development Ordinance, consistent with the rest of the Section.
17. Procedurally, please be advised of the following Municipalities Planning Code (MPC) requirements related to zoning/subdivision and land development ordinance amendments:
  - a. **County Review Period: 45 days**. Since MPC §304 is applicable in Allegheny County, *the county review time is 45 days for all applications*. MPC §304(b) states that municipalities may not take any action on an application until the county's comments are received, or the 45-day review period has passed.

- b. **Timing of Public Hearings: 30 days.** Other sections of the MPC apply in regard to the timing of public hearings. For purposed amendment to a zoning ordinance, for example, MPC §609(e) applies. Municipalities may not hold the public hearing less than 30 days from the date the application was submitted to the county for review. However, MPC 304(b) still applies in regard to when the municipality may *act* on the application.
- c. **Timing of Public Hearings: 45 days.** If the application is for a proposed new or substantially revised zoning ordinance, SALDO, or comprehensive plan, the public hearing may not be held less than 45 days from the date the municipality forwards the application to the county planning agency for its review.
- d. **Failure to Comply.** If the municipality does not follow the applicable procedures of the MPC when amending or adopting land use ordinances and comprehensive plans, or taking other actions authorized by the MPC, it can leave a municipality vulnerable to challenges. Municipalities should always be careful to comply with the MPC, and consider consulting their solicitor if they have questions about the required procedures. (See also MPC §108)

If the proposed amendment is adopted, please send a copy of the fully executed ordinance to the County, including the signed and dated signature pages, within 30 days of adoption as required by the MPC. If the proposed amendment is modified, please resubmit the ordinance for review and reference the ACED file number for this review in your request.

Feel free to direct any inquiries or comments to my attention.

Sincerely,



Matthew T. Trepal, AICP  
Manager, Planning Division

MTT:mts