

May 5, 2021

Dear: City Council with copy to the Mayor and Vicky Kistler, Head of Health Department

We are writing to express our concern with respect to proposed changes in zoning laws regarding allowing the frying of foods in locations in the city where it is currently prohibited. As noted in the Zoning Ordinance of the City of Allentown. Section 1314.02.C.4 (7) there is a prohibition on permitting the Commercial Use in Residential districts if the use includes the on-site frying of foods. Bill No. 31-201 repeals this prohibition.

The West Civic Association is opposed to this change on several fronts:

1. We feel the current law is appropriate and should continue to be enforced.
2. The use of fryers in residential areas presents fire safety issues given the dense population and building structures in these neighborhoods.
3. The externalities associated with frying of foods in close proximity to residences put an undue quality of life burden on residents who are already struggling with multiple quality of life issues in the city.
4. Disposal of used cooking oil will potentially add to issues of waste disposal in the city. We also question how the city will be able to ensure that such waste is disposed of properly, or ideally recycled.
5. Providing increased access to and encouraging the consumption of fried foods is in direct contradiction to the policies being promoted in the city to improve the health of the city's residents. The Health Department is promoting exercise and access to fresh foods as two examples of investment in the health of the city's residents. Why would we use our zoning laws to contradict these actions?
6. It should also be noted that there is an increasing discussion of how cities can in fact use zoning to promote the health of their residents. We would be happy to share our research in this area with Council and other interested parties.

We respectfully request that City Council, at a minimum, undertake additional analysis of the potential impact such a zoning change would have on the residents of the City of Allentown and also engage with the Health Department to discuss more positive ways we could increase access to healthy foods, such as increasing the availability of fresh produce and non-processed foods to residents.

We would also suggest that Council provide evidence that there is sufficient resources to ensure that if such a change in zoning was permitted, the compliance with appropriate laws as far as the installation of equipment to ensure no negative impacts with respect to quality of life or fire risk are followed. We would also request that the city respond as to how the waste generated will be dealt with. Will the city support a waste collection operation that recycles used cooking oil as is done in other cities?

Finally, we respectfully request that a financial impact analysis of such a change in zoning be undertaken to ensure that the residents of the city are not burdened with further costs to administer and enforce this change in the zoning ordinance.

Respectfully,

West Park Civic Association Board

Allentown, PA

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