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July 12, 2019

Michael Hanlon
City Clerk
City of Allentown
435 Hamilton Street
Allentown, PA 18101

Re: Amends the Zoning Code, Article 1327.03.Z.4 to read "In addition to any storage area contained inside multi-family building dwelling units, there shall be provided for each dwelling unit that has a "habitable floor area" (as defined in Section 1302.01) of less than 700 square feet a minimum of 35 16 square feet of storage area in a convenient location (such as a basement) where personal belongings and effects may be stored without constituting a fire hazard and where the belongings and effects may be kept locked and separated from belongings of other occupants" requested by Davison & McCarthy Professional Corporation for City Center Investment Corporation.

Dear Mr. Hanlon:

Please be advised that at the monthly meeting of the Allentown City Planning Commission held on Tuesday, July 9, 2019, the Commission reviewed the above-referenced amendment to the City's Zoning Map requested by Davison & McCarthy Professional Corporation for City Center Investment Corporation.

The Commission agreed, no recommendation can be made due to concerns over the issues contained in the attached staff report and those discussed at the meeting.

If you have any questions concerning this action, please contact me.

Yours very truly,

Irene Woodward, AICP
Director of Planning

Enclosure

IW:jmm

Xc: Mayor Ray O'Connell
Leonard Lightner, Director of Community & Economic Development
Atty. Dennis McCarthy – Davison & McCarthy Professional Corporation
J. B. Reilly – City Center Investment Corporation

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**MEMORANDUM TO THE ALLENTOWN
CITY PLANNING COMMISSION**

July 9, 2019

RE: Request to amend the Zoning Ordinance to reduce the required storage space per Dwelling unit for multifamily buildings of 5 units or greater.

Proposed Amendment

1327.03 ADDITIONAL REQUIREMENTS FOR SPECIFIC USES. The following additional requirements shall apply for each of the following specific uses. An applicant shall provide evidence that a use will meet the requirements of this Article 1327.

Z. Multi-Family Dwellings involving 5 or more dwelling units on a lot shall meet the following additional requirements:

4. Storage Space. In addition to any storage area contained inside multi-family building dwelling units, there shall be provided for each dwelling **unit that has a "Habitable Floor Area" (as defined in Section 1303.01) of less than 700 square feet** a minimum of **35** 16 square feet of storage area in a convenient location (such as a basement) where personal belongings and effects may be stored without constituting a fire hazard and where the belongings and effects may be kept locked and separated from belongings of other occupants.

New/amended language is noted with bold text (**bold**).

Deleted language is noted with red strikethrough text (**red strikethrough text**).

The above matter has been referred to the Planning Commission for a preliminary review and recommendation prior to its formal introduction to City Council. The request is made by the representative of City Center.

Background and Findings:

- The proposed amendment changes the current required 35 square feet of storage space for all dwelling units in multifamily housing of 5 units or more, to 16 square feet for dwelling units less than 700 square feet. It is presumed that there will be no requirement for storage space in units with 700 square feet or greater.
- In their petition the applicant cites the following reason for the request: *Over the past seven years, City Center Investment Corporation has developed 532 apartment units within the City of Allentown with another 400 in active planning. In developing those units, City Center has realized that the current requirement of 35 square is excessive for today's renters. This holds especially true for those units comprised of less than 700 Square Feet of "Habitable Living Space." The current requirement is burdensome to satisfy and creates expenses and costs with respect to design and construction in order*

to create storage space which is not utilized. The requirement of requiring 35 square feet of storage space has resulted in numerous applications for variances from the City's Zoning Hearing Board. City Center's research leads it to conclude that 16 square feet in units having less than 700 square feet of Habitable Living Space provides ample storage space outside or the unit. It is proposed that this amendment shall provide sufficient storage space and prevent the need for developers from seeking variances from the Zoning Hearing Board. It is further concluded that units having more than 700 square feet of Habitable Living Space have sufficient storage space within the unit and, therefore, the Storage Space requirement should not apply.

Discussion and Recommendation:

This office is not opposed to the general concept being requested however some modifications to the proposed amendment are recommended:

- As part of the discussion there needs to be clarification of the reasoning that the larger a dwelling unit is the less likely that storage space will be needed.
- Some amount of storage space is recommended to be required, on a graduated scale, for dwelling units of 700 square feet or larger. It is agreed that a uniform 35 square feet seems excessive, especially for smaller dwelling units.
- Consideration should be given to changing the square feet measure used currently in the ordinance to cubic feet, since storage space units in multifamily typically have height, width and depth.