



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

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Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, September 22, 2026, 12:00 noon
AGENDA

THE MEETING CAN BE ACCESSED AT <http://www.tinyurl.com/LVPC2026> OR VIA PHONE 610-477-5793 Conf ID: 947 550 319#

Roll Call

Courtesy of the Floor

Committee Business

1. *ACTION ITEM*: Whitehall Township – Land Use of Regional Significance – Allentown Central Catholic (JW)
2. *ACTION ITEM*: City of Allentown – Land Use of Regional Significance – ASD Bridgeview Additions (JW)
3. *ACTION ITEM*: Upper Nazareth Township – Land Use of Regional Significance – Nazareth DAO & Athletic Fields (JW)
4. *ACTION ITEM*: City of Allentown – Land Development - 1024 North Bradford Street Data Center (JS)
5. *ACTION ITEM*: City of Bethlehem – Land Development - 2184 Industrial Drive Data Center (JS)
6. *ACTION ITEM*: Tatamy Borough – Zoning Ordinance Amendment – Data Centers (JW)
7. *ACTION ITEM*: City of Bethlehem – Zoning Ordinance Amendment – Data Centers (JS)
8. *ACTION ITEM*: Lower Saucon – Official Map Update (JW)
9. *INFORMATION ITEM*: Housing Supply and Attainability Strategy Update (JS)
10. *INFORMATION ITEM*: WorkshopLV: Land Use, Data Centers, October 7th, 3-4:30 PM at LVPC

Next Comprehensive Planning Committee Meeting:
October 27, 2026, at 12:00 noon



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Executive Director

September XX, 2026

Ms. Lee Rackus, Bureau Chief Planning, Zoning, and Development
Whitehall Township
3219 MacArthur Road
Whitehall, PA 18052

**Re: Allentown Central Catholic Athletics Facility
Whitehall Township
Lehigh County**

Dear Ms. Rackus,

The subject application is considered a Land Use of Regional Significance, as 'All' Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 137). The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, per requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below, and we encourage your participation.

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	September 24, 2026, at 7:00 PM (In-Person) 615 Waterfront Drive, Allentown https://lvpc.org/lvpc-meetings

The application proposes developing an athletic facility and associated parking improvements at 4249 Reliance St (PIN: 548935244151). The lot is located in the very low density residential (R-1) zone, surrounded by a former quarry site to the west, detached residential dwellings to the east with open space to the north and south, and will utilize public sewer and water. The property is within an area identified in *FutureLV: The Regional Plan* as a Development Area. The development of an athletic facility helps 'create community spaces that promote physical and mental health' by 'diversifying park programming' (of Policy 5.3).

Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karsts in the form of a surface mine on the site. The LVPC advises the applicant to ensure proper geotechnical testing prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).

The lot is situated on a steep slope 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 to 'minimize environmental impacts of development to protect the health safety and welfare of the public' (of Policy 3.2). The site also contains a significant portion of woodlands in

the center of the site that isn't marked for demolition where the discus, javelin, and shot put events are held. The LVPC recommends maintaining as much of the existing woodlands as is possible to 'protect high-priority natural lands and water resources' (Policy 3.1).

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'reduce climate change impacts through mitigation and adaptation' (of Policy 3.4), such as geothermal energy systems, green roofs, solar panels and greywater reuse for irrigation and plumbing. We also strongly recommend that the developer seek LEED (Leadership in Energy and Environmental Design) certification for the project. Green Roof systems can also provide additional opportunity to 'manage the rate, volume and quality of storm runoff' and 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2)

The project site is located within the Coplay 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 with this review.

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,

A handwritten signature in black ink, appearing to read 'Jacob Weinberg', written in a cursive style.

Jacob Weinberg
Community and Regional Planner



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PHILLIPS ARMSTRONG
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BECKY A. BRADLEY, AICP
Executive Director

September XX, 2026

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

**Re: ASD Bridgeview Additions – Land Use of Regional Significance
City of Allentown
Lehigh County**

Dear Ms. Gomez,

The application is considered a Land Use of Regional Significance, as all Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 137). The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, per requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below, and we encourage your participation.

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The application proposes redeveloping 265 Lehigh Street, Bridgeview Academy, to renovate the existing building and add on a two-story addition and a new gymnasium with a pedestrian bridge connecting the facilities. The proposal would remove some existing parking lots and rearrange the access drives and add a basketball court at the bottom of the property. The lot is located in P2: Civic and Institutional Buildings and Infrastructure Zoning district and will be served by public sewer and water.

Site Suitability

The proposal supports a core strategy of *FutureLV: The Regional Plan* to increase density in urban areas using infill development (Density Special Section, page 81). According to the General Land Use in *FutureLV: The Regional Plan*, this parcel is in a Development area and has most, or all the factors needed to support growth, such as sewer and transportation infrastructure capacity and contiguity to existing uses. The reuse of the existing site also 'encourages reuse and redevelopment in urban areas' (of Policy 1.1).

The expansion of the school facilities helps 'improve equity by encouraging the development of a well-trained workforce' (of Policy 4.3) as the expansion is anticipated to serve an additional

491 students. The improvements to the athletic facilities help 'create community spaces that promote physical and mental health' by 'diversifying park programming' (of Policy 5.3).

Transportation

The LVPC received a Transportation Impact Assessment which estimated a total of 1,798 trips daily with the completed build out, an increase of 1,025 trips from the proposed expansion. With the addition of the 491 students with the expansion, the reduction in parking spots and no new bus spaces could create traffic issues and the City and developer should explore the impacts to 'provide a safe, well-maintained transportation network to move people and goods efficiently' (of Policy 2.2).

The LVPC recommends extending the sidewalks within the site along the length of the parking lots to provide better access from the parking spaces to the proposed basketball courts and lawns for recreation. The LVPC commends the inclusion of crosswalks and Americans with Disabilities Act (ADA) infrastructure for 'ensuring transportation accessibility for all persons' (of Policy 5.2). Policy 5.2 can be furthered by 'integrating mixed transportation into public space design' with the inclusion of bicycle racks at the site. Finally, with the amount of bus, student and staff vehicles, adequate signage is necessary to avoid conflicts between the different vehicles around the drop off zones.

The Lehigh and Northampton Transportation Authority (LANTA) has reviewed the submitted Site Development Plan for the proposed Allentown School District Bridgeview Academy Addition project located at 265 Lehigh Street in the City of Allentown, and offers the following comments:

LANTA provides fixed-route public transportation directly to the southern portion of project site, with Bus Stop ID 6376 located northbound on Lehigh Street, farside of the intersection at Martin Luther King Jr Drive, approximately .15 miles south of the main entrance. The existing topography along this portion of the Lehigh Street corridor is a substantial hill, and the existing bus stop is located at the base of the hill. While this bus stop serves many nearby residents to the south, a second bus stop closer to the northern entrance of the Bridgeview Academy facility will benefit many in the Lehigh Street and Union Street vicinity. Due to the quick turn routing from Lehigh Street to N 6th Street via Union Street, LANTA recommends a new northbound bus stop to be located at the location where the existing sidewalk meets the northern walkway to the facility, before the right turn onto Union Street. LANTA recommends a 5' concrete pad in between the existing sidewalk and curb for proper boarding and alighting. In addition, LANTA recommends a bench and concrete pad at the new bus stop location, similar to the existing bench located mid-block along the property frontage on Lehigh Street.

LANTA recommends follow up with Molly Wood at mwood@lantabus-pa.gov to discuss any additional bus stop details.

Environment

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'reduce climate change impacts through mitigation and adaptation' (of Policy 3.4), such as geothermal energy systems, green roofs, solar panels and greywater reuse for irrigation and plumbing. We also strongly recommend that the developer seek LEED (Leadership in Energy and Environmental Design) certification for the project. Green Roof systems can also provide additional opportunity to 'manage the rate, volume and quality of storm runoff' and 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2)

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 with this review.

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 I§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,

A handwritten signature in black ink, appearing to read "Jacob Weinberg", written in a cursive style.

Jacob Weinberg
Community and Regional Planner



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BECKY A. BRADLEY, AICP
Executive Director

September XX, 2026

Lisa Klem, Manager
Upper Nazareth Township
1001 Newport Ave
Mt Bethel, PA 18343

**Re: Nazareth DAO & Athletic Fields – Land Use of Regional Significance
Upper Nazareth Township
Northampton County**

Dear Ms. Klem,

The subject application is considered a Land Use of Regional Significance, as 'All' Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 137). The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, per requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below, and we encourage your participation.

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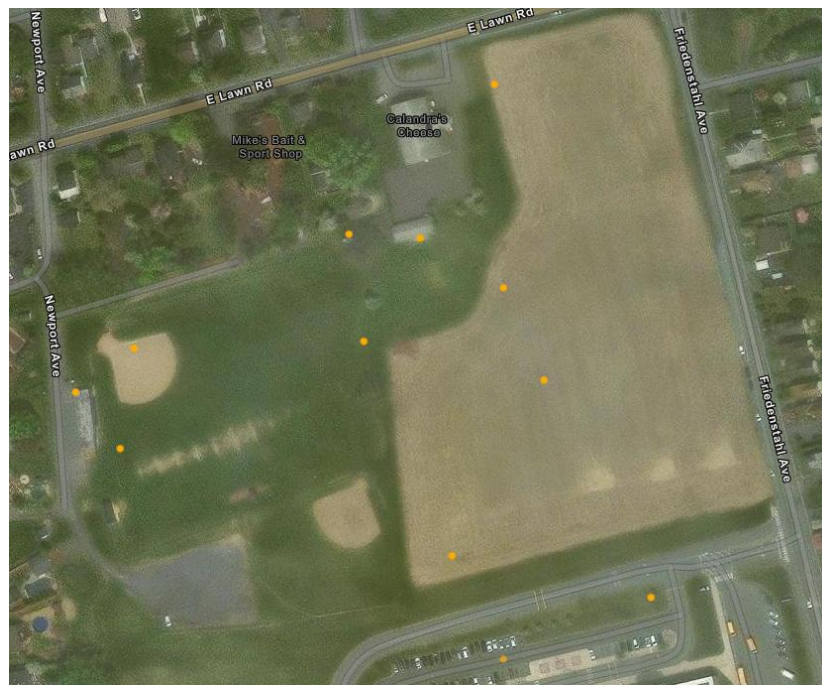
The application proposes redeveloping an existing restaurant into a 17,600 square foot school administration building with parking facility, with three new athletic fields with associated parking improvements by combining three lots at 350 East Lawn Avenue (PIN: J8 11 2A, J8 11 2A-1, J8 11 3A-1). The site is directly adjacent to the Nazareth Area Middle School and in the Village Residential (TD-4) and Village Mixed Use (TD-6) Zones.

The proposal supports a core strategy of *FutureLV: The Regional Plan* to increase density in urban areas using infill development (Density Special Section, page 81). According to the General Land Use in *FutureLV: The Regional Plan*, this parcel is in a Development area and has most, or all the factors needed to support growth, such as sewer and transportation infrastructure capacity and contiguity to existing uses. The reuse of the existing site also 'encourages reuse and redevelopment in urban areas' (of Policy 1.1).

The expansion of the school facilities help 'improve equity by encouraging the development of a well-trained workforce' (of Policy 4.3). The improvements to the athletic facilities help 'create community spaces that promote physical and mental health' by 'diversifying park programming' (of Policy 5.3).

The LVPC recommends construction of sidewalks along the front and side of the sites. This would promote 'safe and secure community design' (of Policy 5.1) and would facilitate additional connections for future connections to the external sidewalk network, particularly any future development in the Village Mixed Use (TD-6) Zone. Policy 5.1 could be furthered by adding additional crosswalks both in the parking lot where pedestrians will cross, and at intersections where the road network connects with the proposed sidewalks. Together these would 'promote safe routes to schools and playgrounds' (of Policy 5.2). A bicycle rack should also be considered for students and residents who may bike to the new facilities and 'provide a safe, well-maintained transportation network to move people and goods efficiently while capitalizing on existing infrastructure' (of Policy 2.2). Finally, the LVPC recommends requesting the traffic impact study where the waiver was requested in order to 'match development intensity with sustainable infrastructure capacity' and 'improve utility and mobility infrastructure of the region' (of Policy 1.1).

Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karsts in the form of surface depressions on the site. The LVPC advises the applicant to ensure proper geotechnical testing prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).



Mapping provided by Bureau of Topographic and Geologic Survey and LVPC

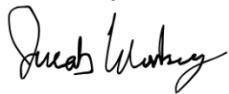
The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'reduce climate change impacts through mitigation and adaptation' (of Policy 3.4), such as geothermal energy systems, green roofs, solar panels and greywater reuse for irrigation and plumbing. We also strongly recommend that the developer seek LEED (Leadership in Energy and Environmental Design) certification for the project. Green Roof systems can also provide additional opportunity to 'manage the rate, volume and quality of storm runoff' and 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2)

The project site is located within the Bushkill 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 with this review.

The members of the Nazareth Area Multi-Municipal Comprehensive Plan are being included in this review letter to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

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,

A handwritten signature in black ink, appearing to read 'Jacob Weinberg', written in a cursive style.

Jacob Weinberg
Community and Regional Planner

cc:

Bradford Flynn, Bath Borough Manager; Belinda Roberts, Bushkill Township Manager; John Defassio, Chapman Borough Secretary; Stephen Nowroski, Moore Township Manager; Theresa Fedele, Nazareth Borough Clerk; Candace Keller, Stockertown Borough Secretary; Mark Saginario, Tatamy Borough Manager; Lori Seese, Lower Nazareth Township Planning and Zoning Administrator; Mark Hudson, Hanover Township Manager;



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Executive Director

September XX, 2026

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

**Re: 1024 North Bradford Street Data Center – Land Development
City of Allentown
Lehigh County**

Dear Director Gomez:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Meeting details are below, and we encourage any and all participation:

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Background

The project proposes to develop the site by constructing a 146,000-square-foot data center facility. The project includes an area for an electrical substation. The project site is located at 1024 North Bradford Street (parcel numbers 640758248221, 640759318024, 640758158799, and 640758206051).

The submission does not include project-specific information describing the proposed facility's operational characteristics. Information was not provided identifying the cooling system, anticipated water demand, total electrical demand, standby generation, whether battery energy storage or other energy storage systems are proposed, mechanical equipment locations, anticipated noise and vibration levels, or heat rejection characteristics. Because these design and operational characteristics determine many of the potential land use, environmental, utility and community impacts associated with a data center, the LVPC cannot fully evaluate those impacts based on the materials submitted.



Site Suitability and Land Use

The proposal is located in an area identified for Development in *FutureLV: The Regional Plan*. Development areas generally contain existing development and infrastructure in the area, and developing the site aligns with *FutureLV* by using vacant and underutilized properties (of *FutureLV* Policy 5.4).

The project site is bounded by Bradford Street to the east, American Parkway to the west, and Dauphin Street to the southwest. Nearby land uses include the Iron Pigs baseball stadium to the northeast, Executive Education Academy Charter School to the southeast as well as offices that include Workforce Board Lehigh Valley, and a commercial/industrial development to the north across American Parkway.

Topography of the area creates natural separation between this site and the existing land uses across North Bradford Street; however, data centers are industrial land uses that can pose health and quality of life impacts to neighboring land uses if not appropriately mitigated. The LVPC notes that no supplemental information was provided with the submitted plans that analyze potential land use impacts related to the development. Potential data center land use impacts to address include:

- A pre-construction professional noise study should be conducted for both perceived and low frequency noises to support community health (of Policy 5.3).

- Based on additional utility and development characteristics, a complete noise impact assessment with the potential use in full operation should be developed and provided to the City to better understand impacts (of Policy 5.3).
- The buildings should be aesthetically designed to minimize the visual impacts of the scale of buildings on nearby properties. Mechanical yards common with data center land uses are not specified on the plans. Once identified, these should be fully screened or enclosed to reduce visual impacts and ‘promote context-specific design solutions’ (of Policy 5.4).
- Nighttime lighting levels should be designed to minimize glare, prevent spillover onto adjacent properties and roadways, and minimize environmental impacts of development (of Policy 3.2).
- The applicant should also assess potential heat exhaust impacts from mechanical systems that may affect nearby land uses (of Policy 3.2).

These community impacts must be mitigated for the project to be suitable for the proposed location (of Policy 1.4). These impacts will also be discussed in greater detail in the following sections of this review.

This area is also identified in the Allentown Vision 2030 Comprehensive Plan as a Strategic Planning Area in the Urban Systems and Areas of Allentown, which are future areas of economic growth, redevelopment, and/or community planning efforts. Because of the nearby Iron Pigs, Charter School and Workforce Board, an area of community-supporting services and land uses in this area would better ‘root economic development strategies in the unique competitive advantages of the region’ (of Policy 4.1) and ‘promote development that complements the unique history, environment, culture and needs of the Valley’ (of Policy 5.4).

Emergency Services

Given the unique electrical, mechanical, and security characteristics of data centers, the City and applicant should coordinate early and continuously with local emergency service providers to ensure adequate preparedness and response capabilities. The applicant should provide fire, emergency medical services, and police departments with detailed information on site access, security protocols, hazardous materials storage, backup power systems, and any specialized equipment such as battery energy storage systems. Emergency responders should be consulted on the adequacy of access points, turning radii, hydrant placement and fire suppression systems, and should receive appropriate training or orientation prior to occupancy. This coordination is essential to safeguard responders, protect critical infrastructure, and ensure that the facility can be safely and effectively served during both routine incidents and large-scale emergencies (of Policy 5.1).

Environment and Utility Infrastructure

The submission does not provide sufficient information to evaluate the project’s full electrical demand or its long-term impacts on the regional power grid. The applicant should clarify the total projected electrical load at full buildout and demonstrate coordination with PPL to confirm that the existing grid can reliably accommodate this

load without degrading service to current residential or commercial users. The applicant should obtain written confirmation from PPL that identifies whether grid upgrades will be required, such as substation expansion, new feeders, or transmission enhancements, and how these improvements will be funded to promote fiscal health and sustainability (of Policy 4.6).

Additional detail is needed on how the facility will align with industry energy efficiency standards, including anticipated Power Usage Effectiveness (PUE) targets, energy management audits, and reporting practices. The applicant should also identify what proportion of its energy use will be met through renewable sources and whether it is willing to support new renewable energy generation, rather than relying solely on existing supply. Information on the developer's interest or capacity for onsite or offsite renewable energy production, such as solar, battery storage, or power purchase agreements, is necessary to understand the project's long-term sustainability and its alignment with regional clean energy goals (of Policy 3.4).

The site plans also do not specify the number or locations of backup generators. If generators are proposed, the applicant should identify their number, rated capacity, fuel type, location, anticipated emissions, enclosure or sound attenuation measures, fuel storage and spill containment provisions, and anticipated testing frequency and duration. The applicant should identify applicable state or federal air quality permitting requirements and evaluate lower emission alternatives where feasible to minimize air quality impacts (of Policy 3.2). The developer should provide a generator testing plan that outlines the frequency, duration, and timing of tests so the City can adequately evaluate potential noise, air quality, and neighborhood impacts in coordination with neighboring properties (of Policies 5.2, 5.3, and 5.4).

The application lacks essential information regarding the project's water demands and cooling system. The developer should identify the specific cooling technology proposed, whether air cooled, water cooled, evaporative, or hybrid, as each has significantly different implications for water use and infrastructure needs. The submission should also clarify whether the system incorporates water reuse or heat recovery measures that could reduce overall consumption. Given the region's current drought conditions, it is critical that the applicant model water use under drought stage or peak stress scenarios and demonstrate long-term reliability of the proposed water supply. If connection to the public water system is anticipated, immediate coordination with Lehigh County Authority is recommended to evaluate capacity needs and any potential infrastructure upgrades (of Policy 3.2).

Landscaping is proposed along the property frontages throughout the project site and along the property boundary. Adequate buffers, landscaping, berms, and architectural treatments are essential to ensure buildings fit in with community character and disrupt the visual impact of large building mass (of Policies 3.2 and 3.4).

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'reduce climate

change impacts through mitigation and adaptation' (of Policy 3.4), such as geothermal energy systems, green roofs, solar panels and greywater reuse for irrigation and plumbing. The developer should also consider adding electrical vehicle charging spaces at the site to serve the residents and 'advance deployment of alternative fueling infrastructure' (of Policy 2.5). Green Roof systems can also provide additional opportunity to 'manage the rate, volume and quality of storm runoff' and 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2).

The project site is located within the Catasauqua 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 with this review.

Transportation

The LVPC previously reviewed another site plan at this location in a letter dated August 11, 2022. At the time, warehousing was the proposed land use. Data centers generally involve substantially less routine freight and employee traffic than comparably sized warehouse and distribution facilities. However, specific staffing, service, delivery and other operational trip information was not included in the submission therefore no assessment of traffic impacts could be assessed with this plan submission. The Iron Pigs stadium and Executive Education Academy Charter School developments are identified as Traffic Generators. Union Boulevard is also identified as a high crash corridor between Airport Road to the east and North 11th Street to the west.

Aspects of the site plan can be improved to better ensure adequate transportation access and movement. The submitted site plan appears to retain a transportation and parking layout characteristic of a more freight-intensive industrial use. The parking tabulation on the plan identifies 94 passenger spaces and 36 truck spaces are proposed. Because no operations narrative or project-specific transportation information was submitted, the applicant should provide the anticipated number of employees, shift patterns, service and delivery activity and other vehicle trips necessary to operate the data center, and revise the parking and loading layout accordingly. Once the appropriate amount of commercial truck parking spaces is determined, any resulting changes to the site plans should clearly separate these traffic movements to minimize conflicts. Electric vehicle charging capacity should be provided for both commercial and passenger vehicles (of Policy 2.5).

Sidewalks are proposed along all road frontages of the project site, connecting to the existing sidewalks on American Parkway, which supports pedestrian safety and reducing fatalities towards zero (of Policies 5.1 and 5.3). North Dauphin Street and North Bradford Street west of North Dauphin Street are in an area identified for trail and multimodal enhancements as part of the Delaware & Lehigh National Heritage Corridor trail network. However, no connections to trails or transit are provided. Bicycle racks should be included near building entrances to accommodate alternative transportation options and offer a seamless network for employees to safely ride to work (of Policies 2.2, 2.3 and 5.3).

Conclusion

Overall, given the lack of information submitted with the application as identified in this review letter, the LVPC is unable to reach a conclusion on this proposal's alignment with *FutureLV*. The LVPC strongly advises the City against approving land development plans without reviewing essential information about the operational conditions or impacts the project will generate. As this project moves forward and details are determined by the applicant, if the submitted plans substantially change, the plans must be resubmitted to LVPC for review prior to plan signing and recordation.

The LVPC has copied representatives from adjacent municipalities and review agencies to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

Municipalities, when considering 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.

Please let me know if there are any questions about this review.

Sincerely,



Jill Seitz
Chief Community and Regional Planner

cc: David Petrik, Deputy Director of Public Works; Melissa Velez, Senior Planner; Brandon Jones, Planner; Joseph Millick, City Engineer; Brian Hite, Assistant Planner; Samantha Pearson, Lehigh County Director of Community and Economic Development; Liesel Gross, Lehigh County Authority Chief Executive Officer; Garrett Cook, Lehigh County Conservation District Engineer; Fadia Halma, PA DCED Lehigh Valley Regional Director; Alicia Karner, PA DCED BusinessPA Lehigh Valley Regional Office Director; Dean Ritter, PA DEP Assistant Regional Director; Jane George, PPL Regional Affairs Director; Brian Boyer, PennDot District 5.



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BECKY A. BRADLEY, AICP
Executive Director

September XX, 2026

Cathy Fletcher, Director of Planning and Zoning
City of Bethlehem
10 E Church St
Bethlehem, PA 18018

**Re: 2184 Industrial Drive Data Center – Land Development
City of Bethlehem
Lehigh and Northampton Counties**

Dear Director Fletcher,

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). The meetings occurred on:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	September 24, 2026, at 7:00 PM (In-Person) https://lvpc.org/lvpc-meetings

Background

The project proposes to redevelop an approximately 6.8-acre industrial property at 2184 Industrial Drive with a 131,380-square-foot data center. The proposed building includes two floors, consisting of approximately 65,590 square feet per floor. The plans also identify substantial electrical infrastructure associated with the facility, including a proposed substation and medium-voltage equipment area.

The applicant has provided supplemental information explaining how the facility would be cooled and powered, how much water and electricity it may use, what may generate noise, and how potential impacts may be reduced. The applicant has indicated that several important design details are still being finalized, and that additional technical documentation will be provided as the design advances.

Site Suitability and Land Use

The proposal is in an area identified for Development in *FutureLV: The Regional Plan*. Development areas generally contain existing development and infrastructure in the area. Redevelopment of an existing industrial property for a new industrial use supports the efficient use of previously developed land and infrastructure and the aim of *FutureLV* to use vacant and underutilized properties (of Policy 5.4). The project site is bounded by Avenue B to the west, Industrial Drive and Route 22 to the south and east, and industrial land uses to the north and west.



The impacts of a data center depend heavily on how it is designed and operated, including how it is cooled, how much power and water it uses, whether it generates power onsite, and where mechanical equipment is located. The supplemental information submitted by the applicant provides considerably greater detail regarding these characteristics than the site plan alone. The proposed immersion cooling system is intended to transfer heat directly from computing equipment into dielectric fluid, reducing dependence on high-volume air movement and many of the internal server fans associated with conventional air-cooled facilities. The LVPC notes that while these design characteristics have the potential to reduce operational impacts, compatibility should ultimately be evaluated based on the site-specific analyses rather than general information about the technology.

The site is located within an established industrial area and is separated from nearby residential development by Route 22. The industrial setting and highway provide meaningful separation between the proposed facility and nearby homes, reducing the potential for direct land-use conflicts. However, the residential development remains close enough that it should be considered when evaluating noise, air emissions, lighting, heat discharge and the overall visibility of the project.

Existing highway traffic already contributes noise and air emissions in this area. The LVPC recommends that the applicant's impact analyses and the City's review distinguish between existing background conditions and the additional effects of the data center land use.

The project's industrial location is generally appropriate for the proposed use, but final equipment placement, enclosures, screening and other measures should be designed to limit

additional impacts on the residential area across Route 22. This approach supports minimizing the environmental and public health impacts of development and promoting compatibility between different land uses (of Policies 3.2 and 5.3).

Building Height, Scale and Community Character

The proposed building height is approximately 60 feet, which is permitted under the applicable zoning regulations, however it represents a substantial change from the approximately 29-foot height of the existing industrial building. At 60 feet, the proposed building would be about twice as tall as the existing industrial building. The taller building, large footprint and electrical equipment will make the redevelopment more visually prominent than what exists today. The applicant should provide building elevations and, where appropriate, visual simulations or line-of-sight information sufficient for the City to evaluate the appearance of the facility from Industrial Drive, Avenue B, other public rights-of-way and nearby properties.

Architectural articulation, variation in building materials and façades, landscaping and screening should be used to make the building appear less large and imposing from surrounding streets and properties and promote context-specific design solutions (of Policy 5.4). Mechanical and electrical equipment, whether on the roof or on the ground, should also be integrated into the overall site design and appropriately screened. Exterior lighting should be designed to prevent unnecessary glare and spillover onto surrounding properties and roadways to 'minimize environmental impacts of development' (of Policy 3.2).

Power Demand and Electric Infrastructure

The applicant identifies a peak electrical demand of approximately 120 megawatts and a facility-wide target Power Usage Effectiveness (PUE) of approximately 1.24, where a value of 1.0 represents the theoretical ideal of zero wasted energy. According to the National Laboratory of the Rockies, the U.S. Department of Energy's primary national laboratory for energy systems, studies show that the PUE average for data centers tends to be 1.8, but industry leaders have been able to achieve PUE values of 1.2 or less. The LVPC encourages the applicant to continue pursuing a lower PUE value to 'promote energy conservation and efficiency' (of Policy 3.4). The proposed power strategy combines utility service with on-site natural-gas generation, with approximately 20% of normal facility demand anticipated to be provided by natural-gas generation and approximately 80% supplied by the electrical grid as part of the facility's normal power supply. A separate diesel backup system is proposed for significant power interruptions or emergencies.

The applicant reports that a PPL will-serve letter has been received indicating capacity is available to serve the site, and that approximately \$70.5 million in privately funded electrical and utility infrastructure improvements are anticipated. The applicant states that the electrical improvements will be privately funded and may create approximately 130 megawatts of electrical capacity available to other users within the industrial park. The final submission should include applicable PPL documentation describing the improvements necessary to serve the project, the anticipated implementation schedule and responsibility for infrastructure costs. This supports maintaining reliable infrastructure and promoting long-term fiscal sustainability (of Policy 4.6).

The applicant should identify how many generators are proposed (both diesel and natural gas), where they will be located, how often they are expected to operate, how much power they will produce, and their expected noise and air emissions. Continued coordination with the Pennsylvania Department of Environmental Protection and other applicable regulatory agencies regarding required environmental permitting is necessary to understand and minimize

environmental and public-health impacts of development (of Policy 3.2).

Cooling and Water Use

The proposed immersion cooling approach and closed-loop water-and-glycol system can substantially reduce ongoing water consumption compared with systems dependent on evaporative cooling after an initial system of approximately 3 million gallons of water and one million gallons of glycol, as estimated by the applicant. Once filled, the system is intended to recirculate that fluid, with additional water needed primarily for maintenance, cleaning and limited replenishment. Ordinary building water consumption is estimated by the applicant to be approximately 20,000 gallons annually. The applicant notes that the proposed generating equipment may require additional water for emissions control purposes, though final consumption for that process has not yet been established. The applicant should clarify whether the estimated annual water consumption includes domestic water use by employees on a daily basis, and document where the initial water will come from, how quickly the system will be filled, how much water the facility will use each year, how much may be needed for the generators, and whether the public water system can reliably meet that demand during dry periods.

The large initial fill should be evaluated separately from routine annual demand so that the City's review accurately reflects both the one-time and continuing effects on the public water system. These measures support conserving and managing water resources and minimizing environmental impacts of development (of Policies 3.1 and 3.2).

Heat Management

Immersion cooling captures heat from computing equipment more directly than conventional air cooling; however, the captured heat must ultimately be transferred from the facility. The applicant identifies heat rejection equipment among the facility's anticipated mechanical systems. The final design should specify where heat will be released, how much heat is expected when the facility is fully operating, and whether it could affect nearby properties, sidewalks, landscaping or equipment. Heat rejection equipment should be located and designed so that exhaust does not adversely affect adjacent properties, pedestrian areas, landscaping or other equipment and infrastructure. This information will allow the City to evaluate the project's final thermal impacts and supports minimizing environmental impacts of development (of Policy 3.2).

Fluid Management and Environmental Protection

The project will utilize substantial quantities of dielectric fluid, water and glycol. The applicant indicates that critical mechanical equipment will be in controlled building areas and that the final design will incorporate secondary containment, leak detection, isolation controls, spill-response procedures and separation between the closed cooling loop and the stormwater-management system. The LVPC recommends memorializing these protections or commitments into the final plans. Final documentation should identify the types and maximum quantities of fluids stored on-site; containment capacity; locations of tanks and piping systems; emergency shutoff and isolation procedures; and measures preventing releases from entering the stormwater system or surrounding environment. These measures support protecting public health, safety and natural resources (of Policy 3.2).

Noise and Vibration

The applicant indicates estimates an approximately 50-decibel acoustic benchmark due to the use of immersion-cooling and acknowledges that is a general comparison rather than a prediction of sound levels at this specific site. Exterior noise sources are expected to include natural gas generation, diesel backup generators, pumps, transformers, heat-rejection

equipment and other supporting mechanical systems. The applicant has indicated that a sound study has been conducted and that additional acoustic evaluation and mitigation design are underway.

The final noise study should show expected sound levels at the property lines and nearby properties during normal operations, generator testing and emergency conditions. It should also evaluate low-frequency and tonal noise, which can be more noticeable even when overall decibel levels are relatively low. Mechanical and generation equipment should be enclosed, oriented and attenuated as necessary based on the final study. The LVPC also recommends post-construction acoustic verification after the facility reaches normal operating conditions to confirm that the completed facility performs consistently with the assumptions used in the final study and to identify whether additional mitigation is necessary. These measures support community health and compatibility with surrounding development (of Policy 5.3).

Emergency Services

Because the facility would contain high-voltage electrical equipment, generators, cooling fluids and specialized mechanical systems, emergency responders should understand the site and its equipment before the facility opens. Early and continued coordination with the City Fire Department and emergency response personnel is therefore important.

The applicant indicates that the facility will include a fire protection system designed specifically for the final equipment configuration and selected dielectric fluid and that final suppression specifications will be coordinated with applicable fire codes and emergency responders. The final emergency response plan should identify emergency access, equipment shutoffs, utility isolation procedures, fire-suppression systems, hazardous or combustible material inventories and safety data, spill response procedures, emergency contacts and responder access to the substation and mechanical areas. Appropriate facility orientation and training should be provided to emergency responders prior to occupancy. This coordination supports effective emergency services and protection of critical infrastructure (of Policy 5.1).

Transportation

Redevelopment of the property as a data center is expected to involve substantially fewer routine employee, freight and delivery trips than many comparably sized warehouse, distribution or manufacturing uses. The applicant should document anticipated employment, shift schedules, routine deliveries and service vehicles so the City can evaluate normal operating conditions.

Construction of the facility and installation of major electrical equipment may also generate temporary truck and oversized equipment movements substantially different from routine operations. Construction access, staging and delivery routing should therefore be coordinated with the City and applicable transportation agencies to minimize conflicts with surrounding businesses and the regional transportation network (of Policy 2.2).

Community Engagement and Continued Reporting

The applicant has indicated an intent to maintain communication with the community and reviewing agencies through informational meetings and responses to public questions and is exploring an educational partnership with Lehigh University related to data-center research and possible internship opportunities. The LVPC supports continued community engagement as the technical design develops.

Because several of the most consequential operational characteristics remain subject to final engineering, the completed water-balance analysis, acoustic study, utility documentation, air-quality and emissions information, thermal-impact information and emergency-response materials should be made available to the City and reviewing agencies as they are completed. Where these analyses materially affect potential community impacts, the information should also be communicated in an accessible format to residents and other interested stakeholders.

Conclusion

The applicant has taken several steps to address common data center impacts, including redeveloping an existing industrial site, proposing closed-loop immersion cooling, enclosing major equipment and planning additional technical studies. The project location and redevelopment approach support several goals of *FutureLV: The Regional Plan*. However, important aspects of the facility are still being finalized. As the project proceeds, any commitments that are relied upon in determining the project's compatibility should be clearly documented and memorialized. If the submitted plans substantially change as this information is finalized, the plans must be resubmitted to LVPC for review prior to plan signing and recordation.

The LVPC has copied representatives from applicable review agencies to coordinate land-use decisions across municipal boundaries (of Policy 1.4).

Municipalities, when considering 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,



Jill Seitz
Chief Community and Regional Planner

cc: Samantha Pearson, Lehigh County Director of Community and Economic Development; Tina Smith, Northampton County Director of Community and Economic Development; Garrett Cook, Lehigh County Conservation District Engineer; Fadia Halma, PA DCED Lehigh Valley Regional Director; Alicia Karner, PA DCED BusinessPA Lehigh Valley Regional Office Director; Dean Ritter, PA DEP Assistant Regional Director; Jane George, PPL Regional Affairs Director; Brian Boyer, PennDot District 5; Molly Wood, LANTA Planner/Land Use Specialist.



CHRISTINA "TORI" MORGAN
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Executive Director

September 11, 2026

Mark Saginario, Manager
Tatamy Borough
423 Broad Street PO Box 218
Tatamy, PA 18085

**Re: Data Center Ordinance
Tatamy Borough
Northampton County**

Dear Mr. Saginario,

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Meeting participation details are below:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	September 24, 2026, at 7:00 PM (In- Person) https://lvpc.org/lvpc-meetings

The application proposes amending the Tatamy Borough Zoning Ordinance to regulate Data Centers. LVPC supports Tatamy Borough's proactive effort to address emerging land use before proposals arrive. The LVPC offers the following recommendations to further strengthen the amendment and ensure that its protections remain legally defensible under Pennsylvania law. Because several provisions implicate authority assigned by state law to other agencies or extend beyond customary performance standards, the LVPC strongly recommends that the Township Solicitor specifically review the provisions identified below prior to enactment.

The following aspects of the proposed ordinance align with FutureLV:

- **Definitions:** The ordinance distinguishes different types and aspects of Data Storage Center, as well as the borough's definition of Net-Zero operational Utilities. Providing definitions encourages clarity and minimizes impacts of regionally significant land uses (of Policy 1.4).

- **Special Exception Use:** The ordinance proposes allowing Micro Data Centers and Mini Data Centers by Special Exception in their Main Street Commercial District and Business Overlay District. Use by Special Exception allows the borough to evaluate project impacts on a case-by-case basis to determine community needs and sensitivities and balance those needs with the demand for modern technological infrastructure. This approach supports an efficient development process that is responsive to regional needs and minimizes the impacts of regionally significant land uses (of Policy 1.4). Additionally, the LVPC recommends removing the provision stating “No data center of any tier shall be permitted as a use-by-right in any zoning district within the Borough of Tatamy” as the allowance within those districts clarifies where a data center may go and the additional provision is unnecessary and may lead to confusion.
- **Aesthetics:** The aesthetic and architectural standards included in the ordinance help to minimize the visual impacts of the scale of buildings on neighboring properties and ‘promote context-specific design solutions’ (of Policy 5.4).
- **Noise:** The proposed noise limit of 45 dBA at the property during day hours and 40 dBA during night hours, as well as the specific humming lower permitted noise level and acoustic modeling study serve to ‘minimize the environmental impacts of development to protect the health, safety and welfare of the public’ (of Policy 3.2). The LVPC recommends that because Data Centers are operation 24/7, noise levels are unlikely to change throughout the day unlike other kinds of industrial uses, the borough consider placing a standard decibel level regardless of the time of day to further Policy 3.2.
- **Buffering:** The ordinance proposes sufficient buffering to offset any potential impacts of noise and visual impact and ‘minimizes the environmental impact of development’ (of Policy 3.2). The LVPC recommends in the vegetated screening, the borough require ‘native, climate adaptative landscaping’ (of Policy 3.4).
- **Mandatory Sanitary Sewer Interconnection:** The ordinance requires that the data center operator connect to the existing municipal sanitary sewer system which the LVPC supports for ‘matching development intensity with sustainable infrastructure capacity’ (of Policy 1.1).

The LVPC offers additional recommendations for the Township’s consideration to further strengthen its regulations and promote public health, safety and welfare:

- **Net-Zero Generation Mandate:** The ordinance outlines that data centers ‘must provide 100% of their normal and peak electricity consumption through dedicated, on-site or directly connected clean energy systems’ and limits public electric utility grid connection to only emergency and backup systems. The LVPC supports ‘energy conservation and efficiency’ and ‘supporting renewable energy

and diversification of sources' (of Policy 3.4), and 'encourage reuse, sustainable building, site design and community design practices'. However, a 100% mandated sustainable energy and a limitation on connection may be legally dubious. MPC Section 910.2 specifies variances for unnecessary hardships and MPC Section 916.1 allows for challenges of the validity of an ordinance that prohibits or restricts the use or development of land. Additionally, interconnection to grid systems is regulated by the state Pennsylvania Public Utilities Commission (PUC) and provisions preempting the state authority could be challenged.

- **Closed-Loop System Mandate:** The ordinance requires a closed-loop cooling system be used by data centers. The LVPC recommends against setting any specific cooling system requirements as the technology behind cooling systems evolve frequently and the specified evaporative-recirculation cooling method may not be the most efficient and effective solution to mitigate water impact in the future. Instead, the LVPC recommends setting specific performance standards to achieve the same goal while allowing developers to use better techniques and 'support the evolution and adaptability of government' and 'integrate efficiency measures and emerging technologies' (of Policy 1.1).
- **Water withdrawal:** The ordinance proposes prohibiting data centers from drawing public municipal water or extracting local underlying aquifers and requires the installation of four permanent, dedicated groundwater monitoring wells. The intent of the ordinance provisions addressing water supply, groundwater, cooling water, stormwater and process water support conserving water resources (of Policy 3.1). Pennsylvania law permits zoning provisions addressing the availability of a reliable and adequate water supply. The ordinance should therefore remain focused on demonstrating the availability of water, evaluating local land use and environmental impacts, and documenting compliance with outside regulatory approvals rather than independently regulating the amount of a withdrawal. The MPC does not authorize municipalities to regulate water allocation or withdrawal where those matters are otherwise regulated by the PUC or state or federal agencies.
- **Bonds:** The ordinance requires a performance and infrastructure protection bond equal to 110% of the total estimated construction cost. The LVPC supports efforts to 'promote fiscal health and sustainability of municipalities' (of Policy 4.6), however, the MPC outlines in Section 509(a) that financial securities sufficient to cover the costs of site improvements that may be required are permitted, but total estimated construction cost may fall outside of the scope of this provision and not be legal.
- **Parking Requirements:** The ordinance requires one off street parking space per 1,500 square feet of total gross floor area that is designed and intended to be accessible regularly by daily operational employees and a minimum of two spaces for temporary IT contractor services, plus one additional space per

maximum shift employee present on site during peak operations. Because data centers typically have fewer employees than other types of industrial uses, applying parking minimum standards that are typical of other types of industrial uses may lead to overbuilt, unused impervious surfaces that exacerbate stormwater impacts. Additionally, these standards exceed those found for other industrial uses including warehouses in the borough's existing requirements. The LVPC recommends setting a specific parking requirement, such as one space per on-site employee, which supports best-practice contextual standards that match development intensity with appropriate infrastructure capacity (of Policy 1.1) and reduce impervious surfaces and protect water sources (of Policy 3.3).

- **Truck Parking:** The LVPC supports the inclusion of a truck parking spot for the unloading of equipment with the intent to avoid idling at the site for 'strengthening freight mobility to minimize quality of life impacts to residents' (of Policy 2.4).
- **Full-Scale Minimum Acreage and Statutory Acknowledgement of Land Capacity:** The ordinance outlines that Full-Scale Data Centers must have a minimum contiguous lot area of 40 acres and acknowledges that no such area exists within the borough where Mini Data Centers and Micro Data Centers are permitted by Special Exception.
The LVPC recommends consulting with the township's solicitor whether this creates a sufficiently unnecessary hardship under the previous MPC sections mentioned above. Additionally, the LVPC recommends removing Section F (2) as only permitting micro and mini data centers within those zones establishing the same restrictions.
- **Additional Provisions:** The ordinance covers a wide range of topics, but there are several additional provisions that could be considered in the ordinance to strengthen the provisions and provide additional insight:
 - **Decommissioning and Electronic Waste:** The ordinance could include provisions for decommission and site restoration as well as recycling of the decommissioned data center and any electronic waste generated by the site. Taken together, a decommissioning plan and electronic waste plan support the goal of FutureLV to 'enhance the long-term viability of assets' and 'provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling' (of Policies 1.3 and 3.2).
 - **Environmental Impact:** The borough may consider requiring an environmental impact assessment be submitted by applicants to (1) evaluate impacts of data center developments and (2) to propose mitigation strategies for any adverse effects to air, soil, water quality, groundwater sources, wildlife and habitat, and greenhouse gas emissions.

These may be modelled under regular and adverse conditions such as drought, extended power outages and extreme heat. Including these features in the ordinance serves to 'preserve natural resources in the land development process' and promotes stewardship of the Township's and the region's natural resources (of Policy 3.1)

- **Emergency Planning:** the borough could also consider requiring an Emergency Response Plan and coordination with local emergency services on the plan which would 'enhance planning and emergency response capabilities' (of Policy 5.1).
- **Heat Mitigation:** Because data centers generate significant heat, the borough is encouraged to require applicants to submit a Thermal Impact Mitigation Plan that outlines strategies for waste heat reuse or dissipation, which minimizes environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2). Encouraging cool roofs, green roofs/shade trees, and light-colored exterior walls help to mitigate heat island effect and incorporate 'sustainable building, site design and community design practices' (of Policy 3.4).
- **Sustainable Infrastructure/Building Design:** As the above provisions for 100% net-zero impact may not be possible, there are other avenues the borough can take to help 'minimize the environmental impact of development' (of Policy 3.2). The LVPC recommends the borough encourage features like LEED certification and roof-mounted solar energy systems which provide specific standards and align more closely with what is permitted under the MPC.

Municipalities, when considering zoning ordinance amendments, 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)]. Please feel free to reach out with any questions about this review.

Sincerely,



Jacob Weinberg
Community and Regional Planner



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

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Treasurer

BECKY A. BRADLEY, AICP
Executive Director

September 17, 2026

Cathy Fletcher, Director of Planning and Zoning
City of Bethlehem
10 E Church St
Bethlehem, PA 18018

**Re: Zoning Ordinance Amendment – Data Centers
City of Bethlehem
Lehigh and Northampton Counties**

Dear Director Fletcher,

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Meeting details are below, and we encourage any and all participation:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	September 24, 2026, at 7:00 PM (In-Person) https://lvpc.org/lvpc-meetings

The amendment establishes a definition for Data Center, permits the use by special exception in the Industrial (IN) Zoning District, and creates a comprehensive set of related requirements that address environmental conditions, water use, wastewater disposal, electric demand, energy efficiency, electronic waste and decommissioning, emergency response, waste heat, noise, vibration, lighting, parking, dimensional standards, buffers and screening. The proposed requirements also include substantial setback requirements that would distance any proposals from existing sensitive receptors such as houses, schools, child and adult day cares, parks, hospitals and community recreation centers.

The City has undertaken a deliberate process to develop the proposed ordinance that involved consulting regional guidance, sharing best practices with other communities, and translating that information into clear local standards. The proposed ordinance is comprehensive, legally defensible, and supports *FutureLV: The Regional Plan* by 'encouraging an efficient development process responsive to regional needs' (of Policy 1.4).

Land Use and Review Process

Permitting Data Centers by special exception in the Industrial Zoning District 'matches development intensity with sustainable infrastructure capacity' (of Policy 1.1) and provides a structured process for proposals on a case-by-case basis. The proposed regulations require all applicable plans, studies, assessments and mitigation strategies with the zoning permit or land

development application, whichever is submitted first, which is a strong administrative practice because it brings the information needed to evaluate impacts into the review process at the earliest applicable stage, supporting an efficient, predictable development process (of Policy 1.4).

Utilities and Infrastructure

The ordinance appropriately requires applicants to document anticipated water use, wastewater generation and electric demand so that infrastructure needs can be understood as part of the land use review. These requirements provide a basis for transparent and consistent review and directly support efforts to ‘improve the utility infrastructure of the region’ (of Policy 1.1).

Environmental Impacts and Sustainability

The ordinance requires an Environmental Impact Assessment, Water Utilization Report, wastewater documentation and electronic waste provisions. Together, these provisions support protecting the quality and quantity of surface water and groundwater, environmentally responsible disposal and recycling, improved air quality and minimizing impacts associated with utility expansion and technological advancement (of Policy 3.2).

The ordinance also directly addresses waste heat and energy efficiency. Requiring thermal mitigation information recognizes that heat-rejection systems can create localized environmental effects, while the Power Usage Effectiveness provisions establish a measurable basis for understanding facility energy efficiency. These standards strongly support sustainable building and site-design practices, energy conservation and efficiency and business practices that mitigate climate impacts (of Policy 3.4).

Setbacks, Buffers and Screening

The proposed ordinance requires 1,000-foot setbacks from residentially zoned properties and sensitive receptors such as dwellings, institutional uses with residential components, schools, child and adult day cares, parks, hospitals and community recreation centers. The requirements for fencing, evergreen screening and equipment screening provide strong protection against potential visual, noise and operational conflicts. These provisions support context-specific design solutions responsive to Bethlehem’s established neighborhoods, institutions, parks and historic urban character (of Policy 5.4). The LVPC notes that the City’s proposed Data Center definition identifies that a Data Center facility “may also include air handlers, backup power generators, water cooling and storage facilities, utility substations,” etc., and that based on this definition, these accessory components should also comply with setback requirements.

Noise and Operational Impacts

The proposed noise standards represent a particularly well-developed response to the continuous and low-frequency sound characteristics that can distinguish Data Centers from other industrial uses. Rather than relying on a single uniform sound threshold, the City establishes direct daytime and nighttime dBA and dBC limits, a pure-tone adjustment and extensive pre- and post-construction testing requirements. This provides objective, measurable standards for evaluating both modeled and actual operating conditions and directly supports minimizing environmental and quality of life impacts of development (of Policy 3.2).

Emergency Preparedness

The emergency response plan, hazardous material disclosures, site access requirements and first responder training provisions strongly advance safe and secure community design. These materials when submitted should be provided to the City’s fire department and emergency management personnel through the existing interdepartmental review process outlined in the

City's Subdivision and Land Development Ordinance (SALDO) to 'enhance planning and emergency response efforts among emergency-management personnel' (of Policy 5.1).

Construction and Parking

The proposed ordinance requires 1.2 vehicle parking spaces per employee or five parking spaces if the number of employees is unknown, which supports right-sizing parking requirements helps avoid unnecessary impervious coverage (of Policy 2.2). The LVPC supports the City in retaining administrative flexibility where documented operating conditions may demonstrate materially different parking needs.

Decommissioning and Electronic Waste

The required electronic waste and decommissioning plan provides a mechanism for addressing equipment replacement and the eventual cessation of operations, advancing environmentally responsible electronic and hazardous waste disposal and recycling (of Policy 3.2). The City's approach appropriately establishes expectations for long-term site management planning.

Overall, the proposed amendment represents a thoughtful and intentional response to a complex land use. The City's work exemplifies the broader intent of *FutureLV* to prepare local regulations for essential digital infrastructure while protecting public health, environmental resources, infrastructure capacity and community context, and the LVPC commends the City for its commitment to evidence-based planning and sound land use administration.

Municipalities, when considering zoning ordinance amendments, 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,



Jill Seitz
Chief Community and Regional Planner

cc: Tad Miller, City Clerk



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

September 17, 2026

Jay Finnigan, Acting Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

**Re: Official Map Update
Lower Saucon Township
Northampton County**

Dear Mr. Finnigan,

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting. Both meetings will be virtual, and we encourage your participation. The LVPC will issue a follow-up letter after the Commission meeting if Commission members have any additional comments. Meeting participation details are below:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual)	September 24, 2026, at 7:00 PM (In-Person) 615 Waterfront Drive, Allentown
https://lvpc.org/lvpc-meetings	https://lvpc.org/lvpc-meetings

Official Maps are implementation tools that support the community's vision outlined in the comprehensive plan by identifying locations of existing and planned public lands and facilities such as transportation infrastructure, parks and trails, and open space. An official map expresses a municipality's interest in acquiring lands for public purposes sometime in the future, and the creation of the map serves to notify the public of this interest. The LVPC encourages municipalities to adopt official maps as a way of fulfilling the intent of *FutureLV: The Regional Plan* to coordinate efficient development processes (Policy 1.4), and to provide an avenue for a municipality to promote its fiscal health and sustainability (of Policy 4.6).

The Township's Draft Official Map identifies Township, Hellertown Borough Owned Parcels, Road Classification, State and Local Bridges, existing trails, railroads and their right-of-ways, streams, water bodies, FEMA - 100 Year Floodplain, Public Parks, and both preserved farmland and farmland in agricultural security areas. Highlighting these features support numerous aspects of *FutureLV: The Regional Plan* such as Policies 2.2, 3.1, 3.2, 3.3, 5.2, and 5.3.

The LVPC recommends the Township consider incorporating the following additional items to build upon the Draft Official Map:

- The LVPC encourages the Township to identify transportation improvement projects that can be submitted to the Lehigh Valley Transportation Study for inclusion in the Long-Range Transportation Plan (LRTP) to support use of transportation funds to maximize available financial resources and support the fiscal health and sustainability of the Township (of FutureLV: The Regional Plan, Policy 2.6 and 4.6)
- The LVPC recommends the Township include symbology for proposed and conceptual trails. The *Lehigh Valley Trail Connection Strategy* identifies several conceptual trails that could expand the Saucon Region Trail Network, including a connection from Interstate 78 and several different existing rights-of-way from the D&L Trail in Bethlehem down to the opposite side of Lower Saucon.

Municipalities, when considering ordinances and official maps, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please send a copy of any final amendments that are adopted, per the requirements of the MPC.

Sincerely,



Jacob Weinberg
Community and Regional Planner