Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, October 27, 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*: Land Use of Regional Significance – Bethlehem Township - Moravian Academy Athletic Field Renovations (JW)
2. *ACTION ITEM*: Northampton Borough – Zoning Ordinance Amendment – Data Centers (JS)
3. *ACTION ITEM*: Lowhill Township – Zoning Ordinance Amendment – Digital Infrastructure Facilities (JS)
4. *ACTION ITEM:* City of Easton – Zoning and Subdivision and Land Development Ordinance Amendments – Miscellaneous Amendments (JW)
5. *INFORMATION ITEM:* Update on WorkshopLV: Land Use - Data Centers (JW)
6. *INFORMATION ITEM:* Glendon Borough Municipal Support (JS)

Next Comprehensive Planning Committee Meeting:
November 17, 2026, at 12:00 noon

Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

JUDY HALDEMAN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

October XX, 2026

Samantha Smith, Community Development Director
Bethlehem Township
4225 Easton Avenue
Bethlehem, PA 18020

Re: Moravian Academy Athletic Field Renovations – Land Use of Regional Significance
Bethlehem Township
Northampton County

Dear Ms. Smith,

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:**
October 27, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	October 29, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The application proposes improvements to the Moravian Academy Athletic Field at 4313 Green Pond Road (PIN: L7 14 1) with the conversion of two natural grass athletic fields to infilled synthetic turf athletic fields, and construction of athletic lighting, Americans with Disabilities Act (ADA) accessible walkways, storage buildings, and stormwater improvements. The site is identified in *FutureLV: The Regional Plan* General Land Use plan as 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 redevelopment of the site 'encourages reuse and redevelopment in urban areas' (of Policy 1.1).

The improvements to the athletic facilities help 'create community spaces that promote physical and mental health' by 'diversifying park programing' (of Policy 5.3). A bicycle rack is recommended to be included near the parking area to support a safe, healthy, inclusive and livable community (FutureLV: The Regional Plan Goal 5). The addition of a bicycle rack helps to ensure transportation accessibility for all persons, integrates mixed transportation into public space design, and it 'improves connections between bus stops and pedestrian and bicycle infrastructure' (of Policy 5.2). The ADA improvements further these policies.

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,

Jacob Weinberg
Community and Regional Planner

Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

JUDY HALDEMAN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

October 9, 2026

Brian Welsko, Borough Manager
Northampton Borough
1401 Laubach Avenue
Northampton, PA 18067

Re: Zoning Ordinance Amendment – Data Centers
Northampton Borough
Northampton County

Dear Mr. Welsko:

The Lehigh Valley Planning Commission (LVPC) will consider the proposed ordinance amendment 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 occurs during the Committee meeting. Meeting participation details are below, and we encourage any participation:

LVPC Comprehensive Planning Committee:	**LVPC Full Commission:**
October 27, 2026, at 12:00 PM (Virtual)	October 29, 2026, at 7:00 PM (Virtual)
https://lvpc.org/lvpc-meetings	https://lvpc.org/lvpc-meetings

The proposed amendment establishes regulations for Data Centers and Data Center Accessory Uses and permits data centers by conditional use within the I-2 Industrial District. The amendment includes standards addressing setbacks, landscaping and screening, noise and vibration, water supply, geotechnical conditions, environmental impacts, electric demand, emergency management, building design, parking, cooling systems and electronic waste.

Many of the proposed standards are measurable, directly related to potential land use impacts and advance the planning direction of *FutureLV: The Regional Plan* by proactively addressing the land use and infrastructure impacts of an emerging industrial use. Other provisions may overlap responsibilities assigned to state, federal or utility regulators or extend beyond the regulatory reach of municipalities in Pennsylvania.

The following provisions generally address legitimate planning concerns, however the LVPC recommends that the Borough and Borough Solicitor further evaluate them before enactment to ensure that the standards remain within municipal land use authority, are sufficiently objective and do not unnecessarily overlap other regulatory systems:

Electric Utility Capacity, Interconnection and Rates
The LVPC supports requiring applicants to disclose anticipated electrical demand and identify

the electric infrastructure necessary to serve a proposed data center. This information supports infrastructure planning and advancing sustainability (of Policies 1.1, 2.5 and 3.4).

However, proposed §1015(I) requires submission of an Energy Management Plan subject to approval by the Borough. The LVPC recommends that the Borough evaluate this requirement with the Borough Solicitor because regulation of utility service, electric capacity, interconnection and rates principally involves the serving utility, Pennsylvania Public Utility Commission and other state and federal regulatory systems.

A more legally defensible approach may be to require the submission of documentation projected maximum electrical demand, identification of proposed on-site substations and other infrastructure, documentation demonstrating coordination with the serving utility, and available information concerning whether the required service and infrastructure can be provided.

The LVPC also encourages the Borough to verify whether a completed interconnection agreement can reasonably be obtained at the conditional use stage. If utility processes occur later in project development, the ordinance could instead require reasonable evidence of utility coordination at conditional use and final documentation before the appropriate subsequent approval or operation.

The Borough may wish to retain these items as disclosure requirements and encouragements while focusing approval on measurable site and land use impacts.

Air Emissions and EPA Requirements
The amendment requires energy generation equipment to minimize air pollutant emissions, meet or exceed EPA Tier 4 standards and undergo annual testing and reporting. While the LVPC recognizes the Borough's objective of protecting air quality and public health, air emissions are substantially regulated through federal and Commonwealth environmental programs.

The LVPC recommends that the Borough Solicitor evaluate whether the zoning ordinance should independently establish and enforce EPA emissions standards. An alternative approach can be to require applicants to identify proposed generators and fuel sources, disclose anticipated testing schedules and operating characteristics, and comply with Borough standards addressing the local land use impacts of the equipment, including noise, vibration, location, fuel storage and screening. This approach would retain the Borough's ability to evaluate local impacts while reducing potential overlap with state and federal environmental regulation.

Prescriptive Cooling System Requirements
The LVPC supports the Borough's objective of minimizing water consumption. However, §1015(M)(b) specifically requires all water-cooled cooling systems to operate as closed loop recirculating systems and prohibits open loop, once-through and single-pass cooling. Because cooling technology continues to evolve, the LVPC encourages the Borough to evaluate whether the ordinance should regulate the desired performance outcome rather than require one particular cooling technology.

Post-Construction Sound Verification and Financial Security
The LVPC supports requiring an as-built sound study because actual operating conditions may differ from modeled conditions. Continued compliance with the Borough's established noise limits is appropriately enforceable through zoning. However, proposed §1015(E)(a)(3) requires the as-built study six months after issuance of the certificate of occupancy and prior to release of final escrow for the applicable land development phase. The LVPC recommends that the Borough Solicitor evaluate whether long term operational verification can be tied to subdivision and land development financial security. Financial security under the MPC generally serves to guarantee completion of improvements required through land development approval, while continued operational compliance is typically addressed through zoning enforcement.

Water Resources
The ordinance references specific Delaware River Basin Commission withdrawal thresholds. The LVPC encourages the Borough to consider requiring documentation of all applicable DRBC approvals, permits or determinations rather than relying solely on thresholds written into the zoning ordinance. This would reduce the potential for the Borough ordinance to become inconsistent with future changes to outside regulatory programs.

Enhanced Geotechnical Investigation
The proposed ordinance addresses legitimate concerns including carbonate geology, karst conditions, mine workings, settlement, groundwater and impacts from excavation and vibration.

However, §1015(G) requires the applicant to submit an enhanced geotechnical investigation for the entire development site before conditional use approval and prescribes detailed investigation and construction-related requirements. The LVPC recommends that the Borough evaluate whether the enhanced level of investigation should be triggered by objective evidence of potentially hazardous conditions, such as mapped carbonate geology or karst, known mines, unstable slopes, documented subsurface voids, or other identified geological hazards. This approach would maintain strong protection where geotechnical risks are present while more clearly tying the requirement to site specific land use conditions.

The LVPC encourages the Borough Solicitor and Engineer to evaluate the proposed ordinance for land suitability information needed for conditional use review, and detailed structural design requirements governed through applicable construction codes.

Environmental Impact Assessment and Approval Standards
The LVPC supports requiring applicants to evaluate potential impacts involving noise, lighting, stormwater, natural resources and other environmental conditions. However, the required Environmental Impact Assessment also includes broad concepts such as probable future effects, regional effects, alternatives analysis and consistency with municipal and county comprehensive plans.

The LVPC recommends that the Borough evaluate whether each element of the Environmental Impact Assessment clearly informs compliance with an objective ordinance standard or identifies mitigation that the Borough is legally authorized to require. In particular, comprehensive plan consistency is valuable planning information, but the Borough should

evaluate whether inconsistency with a comprehensive plan can independently determine approval of a use that the zoning ordinance expressly permits by conditional use.

The LVPC encourages the Borough to use the Environmental Impact Assessment primarily as a tool to identify impacts and appropriate mitigation under express ordinance standards.

Subjective Standards
Several provisions use standards such as an “unacceptable risk” to public health, safety, welfare or infrastructure, or require emergency procedures to be “sufficiently protective” of public health and safety. These concepts reflect legitimate municipal concerns, but the LVPC recommends that the Borough evaluate whether they can be connected more directly to measurable ordinance requirements, applicable professional standards or findings by qualified professionals. Clear and objective criteria make the conditional use process easier to administer, provide applicants and residents with more predictable expectations and strengthen the Borough's ability to defend and enforce its decisions.

Technical Study Preparation
The ordinance appropriately requires technical studies to be prepared by professionals with qualifications relevant to the work. However, the ordinance states that a professional is not independent if “employed by” the applicant, developer or landowner. Because applicants ordinarily retain and compensate the engineers, acoustical professionals and other consultants preparing required studies, the LVPC recommends clarifying this provision. Submission of technical studies that the applicant is required to prepare does not mean that the Borough must accept the findings without scrutiny.

Permit Revocation for Noise or Vibration Violations
The ordinance authorizes the Borough to revoke previously issued zoning permits where noise or vibration violations are not remediated (§1015(E)(c)). The LVPC recommends that the Borough Solicitor evaluate the proposed permit revocation mechanism against corrective action and other remedies available under the MPC, Pennsylvania court case precedent, and the Borough’s ordinance.

***FutureLV* Alignment**
Several provisions of the proposed amendment support best planning practices and advance policies of *FutureLV: The Regional Plan* by:

- Permitting data centers within an industrial district and evaluating infrastructure needs supports guiding the location and intensity of development and matching development with sustainable infrastructure capacity (of Policy 1.1).
- Electrical demand disclosure and infrastructure coordination support preparing electric utility infrastructure for future technologies and jobs (of Policy 2.5).
- Water supply analysis, stormwater considerations and environmental review support conservation of natural resources and minimization of development impacts (of Policies 3.1 and 3.2).

- Measurable noise and vibration standards, landscaping and equipment screening help protect surrounding properties and community quality of life (of Policies 3.2 and 5.4).
- Emergency response planning and coordination support safe and resilient communities (of Policy 5.1).
- Building articulation, landscaping and objective site design requirements promote context-sensitive design (of Policy 5.4).
- Clear, measurable and legally supportable approval standards support an efficient and predictable development process (of Policy 1.4).

The LVPC has copied representatives of the River Central Multi-Municipal Comprehensive Plan to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

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 I §105, Article III §§303, 304 and 306(a), and Article VI §603(j)].

Sincerely,



Jill Seitz, AICP
Chief Community and Regional Planner

cc: Brent Green, East Allen Township Manager; Melissa Wehr, Hanover Township Manager; Tasha Jandrisovits, North Catasauqua Borough Secretary; Glenn Eckhart, Catasauqua Borough Manager

Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

JUDY HALDEMAN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

October 14, 2026

Jill Seymour, Secretary
Lowhill Township
7000 Herber Road
New Tripoli, PA 18066

Re: Zoning Ordinance Amendment - Data Centers
Lowhill Township
Lehigh County

Dear Ms. Seymour,

The Lehigh Valley Planning Commission (LVPC) will consider the proposed ordinance amendment 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 occurs during the Committee meeting. Meeting participation details are below, and we encourage any participation:

LVPC Comprehensive Planning Committee:	**LVPC Full Commission:**
October 27, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	October 29, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The amendment replaces Ordinance No. 2026-2 and establishes Article 1400 for Digital Infrastructure Facilities. It distinguishes residential and other accessory computing systems from principal Edge Computing Facilities and Hyper Digital Infrastructure Facilities, permits principal facilities by conditional use in the Regional Use Overlay District 2 (RUO-2), and addresses infrastructure, water, noise, screening, emergency response, thermal impacts and ongoing reporting.

The intent of the ordinance amendment advances *FutureLV: The Regional Plan* by addressing the impacts of an emerging land use on the environment, infrastructure, and community. Because several provisions implicate authority assigned by state law to other agencies, or extend beyond customary zoning performance standards, the LVPC offers the following recommendations to further strengthen the amendment and ensure that its protections remain legally defensible under Pennsylvania law:

Noise Limits
The proposed 'Sound Level Limits by Receiving Land Use/District' table (§917.05) allows an 80 dBA Maximum Sound Level during the day and 65 dBA at night, at lot lines of a lot in a residential district. While 65 dBA is similar to the noise level of household appliances (refrigerator, dishwasher, etc.), 80 dBA is similar to the level of a busy highway or gas lawnmower and at a continuous level would have a substantial impact on neighboring properties. To 'minimize impacts of development' (of Policy 3.2), the LVPC recommends that the Township evaluate lower limits appropriate to continuous operations and existing residential conditions.

The proposed ordinance includes a section that allows an exception from the maximum decibel levels in cases of power outages when backup generators are being used (§1412(D)), but this should be reconciled with §917.03, which states that no emergency generators shall exceed the specified sound levels.

The table also assigns both limits to Sundays and national holidays, creating conflicting requirements, and should be clarified.

Electronic Waste Plan
The proposed ordinance requires applicants to submit an Electronic Waste Plan (§1418.03), which supports responsible electronic and hazardous waste management (of Policy 3.2). However, stating that the Electronic Waste Plan is subject to approval by the Township should be evaluated with the Township Solicitor to ensure that the approval provision does not overstep the Township's purview.

Utility Capacity and Approvals
§1407.01 of the proposed ordinance addresses Electrical Demand Disclosure, Infrastructure Capacity, and Impact Standards. Requiring applicants to disclose the anticipated electrical demand and supporting infrastructure of the facility supports 'expanding and reinforcing electric utility capacity' (of Policy 2.5). However, §1407.01.B. states that no facilities shall be approved unless the applicant demonstrates that adequate infrastructure capacity exists, and the LVPC recommends clarifying that the Township evaluates site impacts and relies on utility findings rather than independently determining grid adequacy. Aspects of utility regulation may fall under the jurisdiction of the Pennsylvania Public Utility Commission and legally may not be subject to local zoning approval.

Water Study and DRBC Requirements
The LVPC supports evaluating water demand, supply availability and potential impacts on water resources. However, the proposed ordinance (§1408.02(A)) requires the same Water Resources Impact Statement regardless of whether the facility uses public water or a private well. Certain requirements such as the hydrogeological study and evaluation of nearby wells, surface waters and groundwater may not be relevant to every proposal. The LVPC recommends that the Township and Township Solicitor distinguish information required for all proposals from additional studies triggered by the proposed water source, withdrawal location, demand and potential impacts. For public water proposals, documentation from the provider confirming adequate supply and delivery capacity may address some requirements and support matching

development intensity with sustainable infrastructure capacity (of Policy 1.1). Additional hydrogeological investigations should be tied to identified risks and relevant withdrawal locations, which may differ from the facility site. This approach would maintain resource protections while making submission requirements more proportional and legally supportable.

Section 1408.02(D) includes references water withdrawal gallons-per-day thresholds that would require proof of review and approval from the Delaware River Basin Commission (DRBC). Rather than directly stating thresholds which may or may not align with DRBC (current policies and if policies change), requiring DRBC documentation would be clearer and more enforceable. This would support protecting water resources while encouraging an efficient development process responsive to regional needs (of Policies 3.2 and 1.4).

The LVPC also recommends that the Township Solicitor evaluate whether the Township can require outside-agency approval in its review process (§1408.02(D)). Recent Pennsylvania Commonwealth Court cases have indicated that municipalities are limited in their ability to allow outside agency processes to impact local processes, such as final plan signatures or building permit processing (*PC Land LLC v. Board of Commissioners of Bethlehem Township*, 320 A.3d 804 (PA Commonwealth 2024)). Requiring identification of applicable DRBC requirements and documentation of application status could preserve agency permitting obligations without making their completion a blanket prerequisite to Township approval. Clear approval sequencing and coordination between municipal and agency reviews would further support an efficient development process (of Policy 1.4).

Air Emissions and Generator Technology

The proposed ordinance addresses air quality standards related to backup power equipment, and requires annual testing and reports provided to the Township to ensure that emissions do not exceed allowable limits (§1411). Air emissions are regulated by the Pennsylvania Department of Environmental Protection (DEP) and the U.S. Environmental Protection Agency (EPA). The LVPC recommends that the Township Solicitor evaluate the legal basis and enforcement procedures around these provisions as a best practice when regulating land uses (or Policy 1.4).

Construction Codes

The proposed ordinance includes code-compliance references for specific equipment, ventilation, monitoring and fire-protection requirements (§1405L, N-O, 1408.08 and 1417). The LVPC recommends distinguishing zoning standards for location, access and compatibility from construction and installation standards administered through the Pennsylvania Uniform Construction Code (UCC). The Township should evaluate any requirements exceeding the UCC through the procedures applicable under the Pennsylvania Construction Code Act Section 503, governing how municipalities can change, modify, or exceed the state's UCC as a best practice when regulating land uses (or Policy 1.4).

Thermal Impact Mitigation

The LVPC supports requiring applicants to document anticipated heat generation, cooling equipment, exhaust locations, operating conditions and potential impacts on neighboring properties to minimize environmental impacts of development (of Policy 3.2). However, the

proposed ordinance includes cooling technology restrictions and authorizes the Township to require alternative cooling systems, construction materials and other design measures (§1405(G), 1415 and 1422(5)–(6)). The LVPC recommends that the Township Solicitor and code officials evaluate provisions that extend beyond impact assessment and mitigation planning into equipment specifications or construction methods, which may overlap with the Pennsylvania Uniform Construction Code. Prescriptive requirements may also limit the use of emerging technologies that achieve greater water and energy efficiency or reduce environmental impacts. The Township is encouraged to focus on measurable site impacts and allow applicants to demonstrate effective mitigation through professionally supported approaches as a best practice when regulating land uses (or Policy 1.4).

Stormwater System Design Standard 1408.07
The LVPC recommends that the proposed section on Stormwater Standards (§1408.07) include cross reference to the Township's Stormwater Management Ordinance to ensure that stormwater control measures comply with the stormwater standards and criteria (of Policy 3.2).

Post-Construction Verification and Financial Security
The proposed ordinance ties post-construction sound studies to final land development escrow release (§1412(A)(3)). The LVPC recommends evaluating this linkage against Sections 509 and 510 of the MPC, which governs security for required improvements and its release. Completed sound barriers and other required improvements can be verified through the applicable improvement process, but ongoing operational noise compliance should be addressed through enforceable zoning standards.

Reporting and Mandatory Public Dashboard
The proposed ordinance requires annual reports and a publicly accessible dashboard with monthly utility data, energy-source information and three years of records (§1423(1) and (3)). The LVPC supports information needed to verify water, noise and operating limits, but recommends evaluating the authority and proportionality of mandatory public reporting.

Automatic Shutdown and Corrective Action
The proposed ordinance requires discontinued operations when reports exceed original water estimates or noise limits (§1423(2)). The automatic shutdown requirement and cease-and-desist authority in §1412(A)(3) should be evaluated against the MPC's requirements for enforcement notice, appeal and judicial remedy procedures (MPC Sections 616.1, 617 and 617.2) as a best practice when regulating land uses (or Policy 1.4).

***FutureLV* Alignment**
Several provisions of the proposed amendment support best planning practices and advance policies of *FutureLV: The Regional Plan*:

Use Classification and Development Intensity
Distinguishing accessory computing from principal facilities and reviewing larger facilities by conditional use supports 'guiding development intensity and matching it with sustainable infrastructure capacity' (of Policy 1.1). Full build-out and phasing disclosures and identifying separate developments that are integrated supports evaluation of cumulative site impacts.

These are appropriate planning tools when classifications and approval standards are clear and tied to actual land use conditions.

Water Resources and Infrastructure Disclosure
Requiring applicants to disclose anticipated water demand, supply, wastewater, cooling methods, drought procedures and potential resource impacts supports 'protecting water quantity and quality' (of Policies 3.1 and 3.2). Requiring applicants to identify electrical infrastructure, equipment locations and fiber construction impacts supports infrastructure coordination and preparation for emerging technologies (of Policy 2.5).

Community Compatibility and Site Design
Requiring proposals to incorporate landscaping, buffers, equipment screening, native plantings, downward-directed lighting, building articulation, and parking based on the largest employee shift supports context-sensitive development and mitigation of community impacts (of Policies 3.2, 3.4 and 5.4).

Noise Verification and Emergency Coordination
Requiring professional sound studies that address cumulative equipment noise, generator testing schedules and continuing compliance are appropriate tools for evaluating and managing local impacts (of Policies 3.2 and 5.4). Requiring emergency plans, access procedures, hazard inventories and coordination with responders supports safe community design and emergency management (of Policy 5.1).

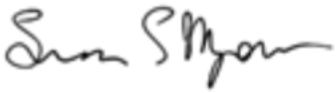
Municipalities, when considering zoning ordinance amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

The LVPC has copied representatives of the *Northern Lehigh Multi-Municipal Comprehensive Plan* to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

Sincerely,



Jill Seitz, AICP
Chief Community and Regional Planner



Susan Myerov
Director of Environmental Planning

CC: Mike Siegel, Lowhill Township Manager; Dawn Didra, Heidelberg Township Administrator; Trish Burkhardt, Lynn Township Administrative Assistant; Roy Hambrecht, Slatington Borough Manager; Wade Marlatt, Washington Township (LC) Manager; Brian Carl, Weisenberg Township Manager.

Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

JUDY HALDEMAN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

October 16, 2026

Dwayne Tilman, Director of Planning and Codes
City of Easton
123 South 3rd Street
Easton, PA 18013

Re: Easton SALDO & Zoning Comprehensive Updates
City of Easton
Northampton County

Dear Mr. Tillman,

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) 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 amending the City's Zoning Ordinance and Subdivision and Land Development Ordinance to clean up sections of the ordinances, improve administrative clarity, add new uses, codify elements of existing patterns in the City, and cover regulatory gaps identified in the ordinances by staff and planning commissioners. The LVPC strongly supports the City's efforts to update its ordinances through "facilitated discussion among residents, stakeholders, appointed officials and elected representatives" (of Policy 1.4). The substantial update represents the achievement of many goals outlined in FutureLV: The Regional Plan by "integrating efficiency measures and emerging technologies" and "supporting evolution and adaptability of government" (of Policy 1.1).

Clarifying Amendments
The proposed ordinance amendment adds or removes several sections that could create conflicts within the Zoning Ordinance, or whose removal would add clarity. These efforts support "an efficient development process responsive to regional needs" (of Policy 1.4) by making it easier for residents, developers, and officials to use the Zoning Ordinance. Some improvements include making sure that all parking requirements are in the off-street parking requirements section of the ordinance rather than in their specific districts, centralizing specific shopping

location provisions in the supplemental regulations, and clarifying the rules for measuring setbacks, density, lot coverage, off-street parking, and the distance for the separation of uses.

Codification of Existing Patterns
The proposed ordinance also codifies several existing patterns in the City. Changes include separating principal uses on one lot, changing fence height limits, adjusting driveway widths, adjusting setback standards to consider alignment with existing buildings, lowering building heights to be compatible with existing buildings, and clarifying regulations on the frequency of convenience stores next to existing retail. These changes all help “promote development that complements the unique history, environment, culture and needs of the valley” by “promoting context specific design solutions” (of Policy 5.4).

Map Changes
As a part of the codification changes two different areas of the zoning map:



The first area was rezoned from the River Corridor (RC) district, which serves as the City’s environmentally sensitive zoning area due to its proximity to the river, to the West Ward (WW)

district. It lies between North 7th Street, Bushkill Street, and Veile Street. Mapping does indicate the presence of steep slopes and a riparian buffer area along the Bushkill Creek, but the existing form of the neighborhood aligns better with the West Ward Zoning District. The LVPC supports the City exploring, in future updates, the inclusion of a riparian buffer overlay, which would allow the City to protect its waterways, “protecting high-priority natural lands and resources” (of Policy 3.1) while “promoting an efficient development process responsive to regional needs” (of Policy 1.4).

The second area, between Centre Street, West Cooper Street, Pastor Fred Davis Street, and West Canal Street, changes from the South Side (SS) district to the Adaptive Reuse (AR) district. The current district splits the Adaptive Reuse District, and connecting the two creates a corridor where existing uses and the promoted multi-family and institutional uses would fit well with neighborhood character, which would “guide location and intensity of development” and “encourage reuse and redevelopment in urban areas” (of Policy 1.1).

New Uses
The proposed ordinance also adds seventeen new uses. Several of these are split out from uses already codified and have greater impacts. The ordinance separates a regular bar and pub from a night club, a crematorium from a burial place/cemetery, truck terminals from warehouses, entertainment and gaming establishments from gambling establishments, and convenience stores and grocery stores from normal retail uses. These uses are often more impact-intensive and are given supplemental regulations that help mitigate these impacts. The changes help “minimize impacts of Land Uses of Regional Significance” (of Policy 1.4). Many of the proposed regulations help “minimize the environmental impact of development” and place these uses in zones that fit their character, which helps “promote development that complements the unique history, environment, culture and needs of the valley” (of Policy 5.4). Several of these changes advance the policies and goals of FutureLV: The Regional Plan.

Electric Vehicle Charging
The ordinance allows electric vehicle charging both as a principal use and as an accessory use, and makes the accessory use widely available throughout many of the districts in the City where appropriate. These provisions help “advance deployment of advanced fueling infrastructure” and “incorporate environmentally sensitive transportation technologies” (of Policies 2.5 and 3.4).

Solar
The ordinance also seeks to change how solar energy systems are regulated in the City. It removes sections that are covered by other legislation and are not powers given to zoning under the MPC, as well as sections that make installing solar more restrictive and factors that should be determined by the installer. Easing these regulations helps make solar more accessible to residents and helps “reduce climate change impacts through mitigation and adaptation” (of Policy 3.4). The ordinance also includes a provision reducing the fine for abandonment to $300 per day, up to a maximum of $1,000 per day. The LVPC recommends that the City consult with a solicitor, as MPC Section 617.2(a) states a maximum judgment of $500, with each day constituting an additional violation.

Warehouse and Truck Terminal Standards
The ordinance proposes new regulations for warehouse/logistics uses that help “strengthen freight mobility to minimize quality of life impacts to residents” (of Policy 2.4). The LVPC supports the inclusion of snow removal equipment for trucks; electric charging infrastructure, which supports Policy 2.5; bicycle racks, which support Policies 2.2 and 5.2; native landscaping and natural resource preservation, which support Policy 3.4; and truck driver amenities. The

DRAFT

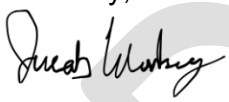
truck terminal use must also meet all of those requirements, as well as additional parking amenities and signage requirements that strengthen Policy 2.4 for freight-exclusive uses.

Data Centers
The ordinance also adds regulations for data centers in the City. The proposed amendment includes many strong data center provisions and addresses concerns related to impacts, including thermal impact mitigation plans, environmental impact assessments to measure water, sewer, and electrical impacts of the development, electronic waste decommissioning plans, emergency response plans, buffering, and setbacks. Because data centers operate 24/7 and noise levels are unlikely to change throughout the day, the LVPC recommends that the City consider setting one allowable standard each for dBA and dBC.

Subdivision and Land Development Ordinance
The ordinance proposes several changes to the Subdivision and Land Development Ordinance. It adds requirements for transportation impact studies and transportation impact assessments, which help “provide a safe, well-maintained transportation network” (of Policy 2.2) and “promote use of cost-benefit analysis in planning, development and infrastructure decisions” (of Policy 4.6). The ordinance also adds a general impact assessment split into two sections: a community impact assessment, based on the impact of the use on surrounding uses and its compatibility with the built environment, and an environmental impact assessment, which details how the proposed use would affect the environment where it is built. These assessments help “minimize impacts of Land Uses of Regional Significance” (of Policy 1.4) and “minimize the environmental impact of development” (of Policy 3.2).

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

DRAFT