



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, April 21, 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*: Allen Township – Land Use of Regional Significance – Lehigh Valley East 16 Data Center (JS)
2. *ACTION ITEM*: City of Allentown – Zoning Ordinance Amendment – Data Centers (MGC)
3. *ACTION ITEM*: Moore Township – Zoning Ordinance Amendment – Data Centers (MGC)
4. *ACTION ITEM*: Lower Nazareth Township – Zoning Ordinance Amendment – Data Centers (MGC)
5. *ACTION ITEM*: Lower Macungie Township – Zoning Ordinance Amendment – Data Centers (MGC)
6. *ACTION ITEM*: Upper Milford Township – Zoning Ordinance Amendment – Various (JW)
7. *ACTION ITEM*: Upper Milford Township – SALDO Amendment – Various (JW)
8. *INFORMATION ITEM*: Updated Draft Housing Supply and Attainability Strategy (JS)
9. *INFORMATION ITEM*: Strategy Labs (JS)

Next Comprehensive Planning Committee Meeting:
May 26, 2026, at 12:00 noon



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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

April XX, 2026

Ms. Ilene Eckhart, Manager
Allen Township
4714 Indian Trail Road
Northampton, PA 18067

**Re: Prologis East 16 – Land Use of Regional Significance
Allen Township
Northampton County**

Dear Ms. Eckhart,

The application proposes to revise previously approved land development plans reviewed by the Lehigh Valley Planning Commission in 2015 that have since been constructed. At the time, the project proposed a warehousing land use. The plans are now proposed to be revised by adding a substation, reducing parking areas, adding outdoor equipment areas, and converting the existing building into a data center.

This project is considered a land use of regional significance under *FutureLV: The Regional Plan* in the 'Major Industrial and Office Parks' category. 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 participation details are below, and we encourage your participation:

LVPC Comprehensive Planning Committee Meeting:

April 21, 2026, at 12:00 PM (Virtual)
<https://lvpc.org/lvpc-meetings>

LVPC Full Commission Meeting:

April 23, 2026, at 7:00 PM (Virtual)
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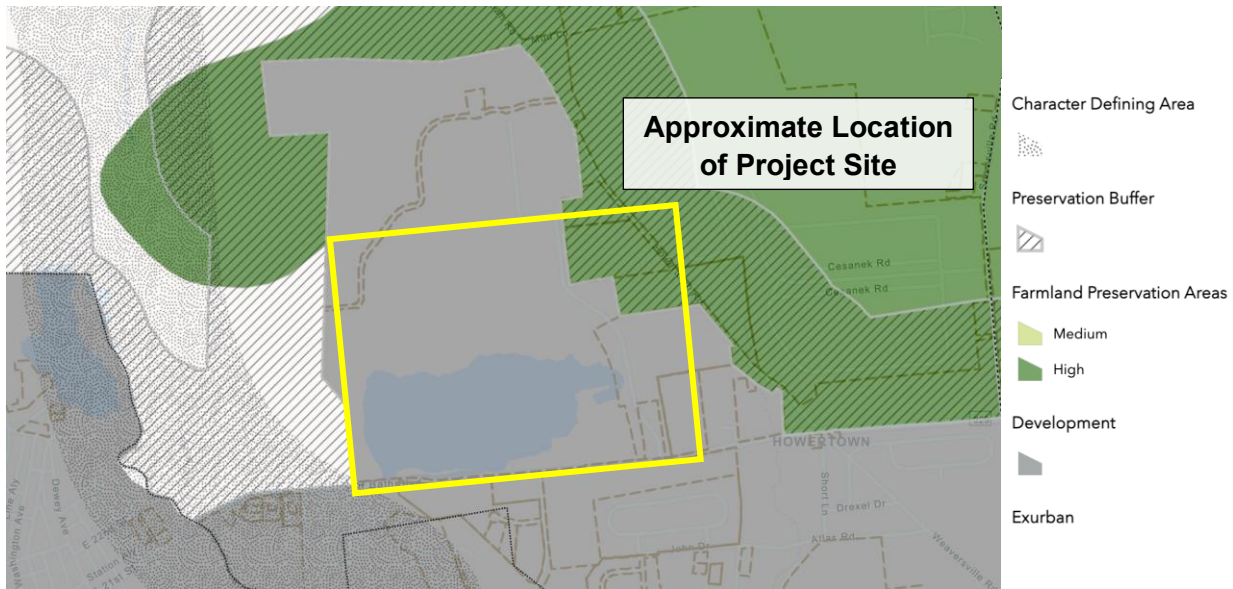
BACKGROUND

The project proposes to convert an existing warehouse into a data center, including site improvements to facilitate the new use, including the construction of a substation and addition of outdoor equipment areas. The project site is 2500 Liberty Drive, north of Nor Bath Boulevard and west of Howertown Road (parcel number L4 9 8-2). The site is also approximately one half-mile east of the Allen Township boundary with Northampton Borough.



SITE SUITABILITY AND LAND USE

The proposal is located within an existing industrial area and is within the Development area identified in the General Land Use Plan of *FutureLV*. The proposal to repurpose an existing industrial building within an established industrial area supports *FutureLV*'s direction to facilitate redevelopment and reinvestment within commercial areas where infrastructure and prior site disturbance already exist (of Policies 4.6 and 1.1). Reuse of an existing building can reduce pressure to convert farmland or other undeveloped land elsewhere in the region and avoids many of the land consumption impacts associated with new greenfield development (of Policy 3.3).

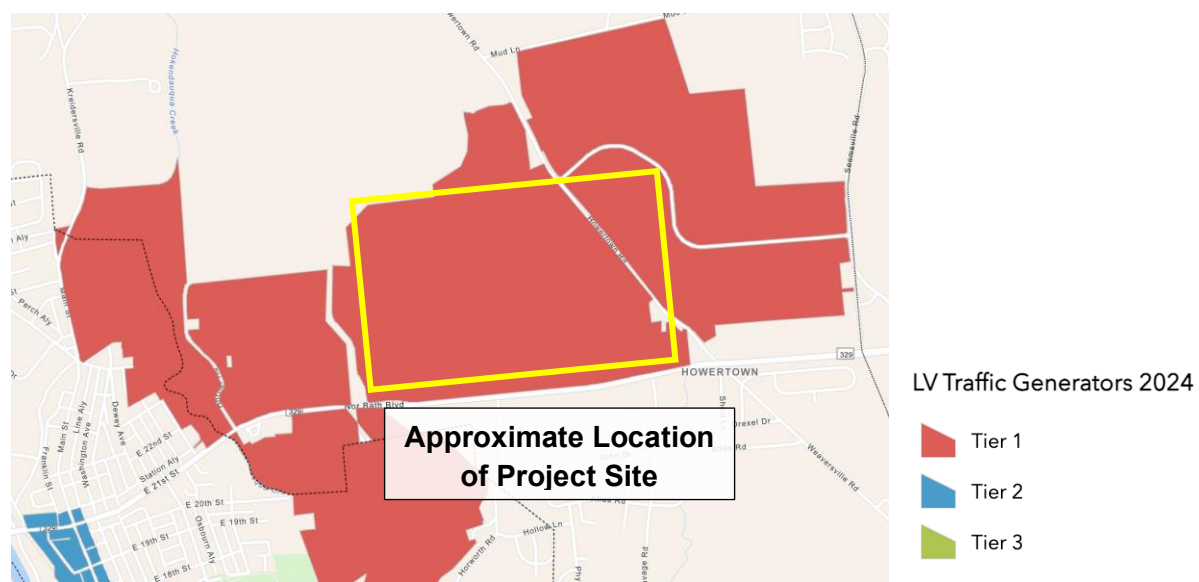


However, the LVPC notes that a data center is functionally different from a warehouse, even where both may occur within an industrial setting. A warehouse is typically defined by goods movement, truck activity, and employee parking demand, whereas a data center is defined more by electrical infrastructure, cooling systems, backup generation, security, and utility demand. Because of those differences, the change in use should be reviewed not only as a physical site revision, but also as a shift in operational characteristics and impacts. The Township should confirm that the zoning treatment of the use is supported by the ordinance and that any applicable performance standards adequately address the use as proposed, to support best practices in land use regulation (of Policy 1.4).

TRANSPORTATION

Because the proposal is an adaptive reuse of an existing building, the plan appears to reduce parking and reallocate portions of the site to equipment and utility areas. If the revised use results in lower employee counts and fewer daily vehicle trips than a warehouse, that reduction in parking may be appropriate. However, the plans should clearly document the expected number of employees per shift, visitors, contractors, and any periodic maintenance traffic so that the Township can verify that the proposed parking supply is appropriate to the use and ensure right-sizing transportation infrastructure (of Policy 2.2).

The approval and construction of industrial facilities in the Howertown Road / Nor Bath Boulevard area have resulted in a concentration of Tier 1 Traffic Generators that substantially impact the roadways of neighboring municipalities. Compared with a warehouse use, a data center generates substantially less employee and truck traffic on a day-to-day basis. The proposed conversion eliminates potential traffic impacts on the surrounding roadway network that would have occurred if a warehouse tenant had opened in the existing facility, which supports ‘minimizing quality of life impacts of freight on residents’ (of Policy 2.4).



health, safety and welfare (of Policy 3.2). The applicant should document:

- The type and location of all cooling equipment.
- The number, size and location of generators.
- Proposed sound reduction measures.
- Hours and frequency of generator testing.
- Proposed lighting levels and shielding.
- Fence and screening design around equipment yards and the substation.

Because data centers can vary significantly in water demand depending on cooling design, the applicant should clearly identify whether the facility will use air-cooled, evaporative, hybrid, or water-based cooling systems. At present, LVPC cannot determine the likely water demand of the use based on the information provided. This is a significant issue because the intensity of water demand can vary considerably depending on system type and facility scale. The applicant should provide projected average and peak water demand, including any seasonal peaks, and explain whether water demand would change during drought or emergency conditions to 'protect the quality and quantity of surface water and groundwater' (of Policy 3.2).

Similarly, the plans do not clearly identify the presence or absence of battery energy storage systems, fuel storage, or other hazardous materials associated with backup power systems. If proposed, those facilities should be reviewed for environmental protection, spill containment, fire safety, and emergency response coordination (of Policy 5.1). If backup generators are utilized, they should be of Tier 2 standard to support improved regional air quality (of Policy 3.2 and 3.4).

The plans propose substantial landscaping throughout the site, including internal islands, perimeter planting, and buffering along the edges of development, which supports *FutureLV's* emphasis on compatibility between land uses, buffering and high-quality site design. Given the site's position within a developed industrial area but near surrounding agricultural and lower-intensity areas, continued emphasis on perimeter screening and long-term landscape maintenance is an important component of context-specific design solutions (of Policy 5.4). To support the long-term sustainability of the proposed landscaping design, the LVPC recommends that all parking lot islands contain sufficient soil volume and width to support the recommended tree species noted on the landscaping plan (canopy trees typically require 1,000-1,200 cubic feet of soil to support healthy growth).

Based on the provided Lot 2 Plant List, many of the proposed species appear to be native or generally appropriate to eastern Pennsylvania. However, several listed species do not appear to be native and should be reconsidered, including *Zelkova serrata* 'Green Vase' (Japanese zelkova), *Tilia cordata* 'Greenspire' (littleleaf linden), *Abies fraseri* (Fraser fir). Where feasible, the applicant should prioritize species native to the region to improve habitat value, resilience and long-term compatibility with surrounding landscapes (of Policy 3.4).

If the revised use meaningfully reduces vehicle demand relative to the prior warehouse use, LVPC encourages the Township to evaluate whether any excess pavement or underutilized parking could be removed or repurposed as additional landscaped area, stormwater improvements, or tree canopy. This would support both *FutureLV's* land use and environmental goals.

The project site is located within the Hokendauqua 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 as attachment 1.

UTILITY AND SERVICE NEEDS

Data centers have substantial electrical needs, and those needs are verified by the proposed substation. The Township should request documentation regarding:

- Total projected electrical demand at buildout.
- Whether the proposed substation is dedicated to the site.
- Confirmation from the utility provider regarding available capacity.

Although the site is in the Development area, infrastructure capacity must be verified to support the long-term viability of the project and local services. The Township should ensure that the project's utility demands are fully understood and coordinated to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).

The submitted plansf also do not clearly indicate who will provide sewer and water service, or if utility service providers have verified capacity and willingness to serve the project. This information should be clearly shown on the plans and supported by provider correspondence where appropriate. The Township should confirm the responsible public or private utility providers, available capacity and any conditions of service. Because the water and sewer demands of a data center can differ materially from a warehouse, this should be documented rather than assumed from the prior approval. Reviewing this information helps ensure that the project 'minimizes environmental impacts of development' (of Policy 3.2).

Given the nature of data centers to require extensive electrical infrastructure, backup generation, transformers, battery systems, fuel supply and secured equipment yards, the Township should confirm that local emergency responders have been engaged regarding access, firefighting, emergency shutoff procedures, hazardous materials, and any specialized response needs. The plans should clearly demonstrate:

- Fire lane access and turning movements.
- Access to all equipment yards and utility areas.
- Hydrant locations and fire flow adequacy.
- Fencing and security provisions that still permit emergency access.
- Whether emergency responders have reviewed the proposal.

Data centers often utilize specialized fire suppression systems designed in consideration of the electrical equipment they contain, and many emergency providers must undergo training specifically to understand how to serve data center facilities. Review of the above elements and continuous coordination supports safe development patterns, emergency readiness, and coordination with public safety providers (of Policy 5.1).

Because data centers may include large generator fields and other continuously operating equipment, the Township should also consider whether additional operational conditions are needed relating to generator testing, noise management and emergency notification procedures.

Outstanding Information

Based on the material provided, LVPC is unable to fully assess several aspects of the proposal that are relevant to *FutureLV*. The following items should be clarified or provided by the applicant:

1. Water service provider and water demand, including who will provide water service or the expected water demand of the proposed cooling system.
2. Sewer service provider and sanitary/process discharge, including who will provide sewer service or whether there will be any process-related wastewater.
3. Electrical demand and utility coordination, including documentation regarding overall load, available capacity, or off-site utility improvements.
4. Cooling system design, including documentation describing whether the facility will use air, water, evaporative, or hybrid cooling, as these directly affect water demand, noise, and heat exhaust.
5. Generator and outdoor equipment details, including the number, size, fuel type, sound levels, hours of testing, and screening of any generators or similar equipment.
6. Noise analysis, including expected operational noise from cooling equipment, transformers, generators, or testing events.
7. Lighting plans, including the intensity, shielding, or hours of operation of site lighting associated with the revised use.
8. Emergency response coordination including consultation with fire, police, or emergency management regarding access, hazardous materials, electrical infrastructure, or fuel systems.
9. Traffic and parking justification, including anticipated trips and traffic generation from employee counts, visitors, service calls, or periodic deliveries.

The LVPC strongly recommends the Township further refine its zoning ordinance definitions and regulations beyond this project review to clarify how data centers and similar land uses are classified under the zoning ordinance and ensure ordinance standards adequately address distinct impacts of emerging and evolving land uses.

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.

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

Please feel free to reach out with any questions about this review.

Sincerely,



Jill Seitz
Chief Community and Regional Planner

cc: Mike Schwartz, Township Engineer; Justin Fanslau, Prologis SVP Market Officer, Applicant; Verdantas, Project Engineer; Alice Rehrig, Lehigh Township Manager; Stephen Nowroski, Moore Township Manager; Brent Green, East Allen Township Manager; Melissa Wehr, Hanover Township (LC) Manager; Brian Welsko, Northampton Borough Manager; Glenn Eckhart, Catasauqua Borough Manager; Tasha Jandrisovits, North Catasauqua Borough Secretary; Randy Cope, North Whitehall Township Manager.



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April 14, 2026

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

**Re: Data Center Zoning Ordinance Amendment
City of Allentown
Lehigh County**

Dear Ms. 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, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting:</p> <p>April 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting:</p> <p>April 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>
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The application proposes to amend the Allentown Zoning Ordinance to include definitions and regulations for Data Centers in the Manufacturing and Industry Group and to amend the Use Table to add Data Centers in the Industrial General (IG) and Industrial Manufacturing (IM) as a special exception use.

LVPC supports Allentown’s proactive effort to address an emerging land use before proposals arrive. That approach is consistent with *FutureLV: The Regional Plan’s* direction to guide the location and intensity of development, match development intensity with infrastructure capacity, and encourage an efficient development process responsive to regional needs ([of Policy 1.1](#)).

Allentown’s proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

The following aspects of the proposed ordinance align with *FutureLV*:

- **Special Exception Use:** Permitting data centers as a special exception use enables the City to establish substantial submission criteria and thoroughly evaluate project impacts on a case-by-case basis. Including review and comment from the Allentown Planning Commission (ACPC), Allentown Environmental Advisory Council (AEC), and Allentown Shade Tree Commission (ASTC) supports ‘an efficient development process that is responsive to regional needs’ and helps to ‘facilitate discussion among stakeholders and appointed officials’ ([of Policy 1.4](#)).
- **Electronic Waste:** The ordinance includes procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which aligns with the goal of *FutureLV* to ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’ ([of Policy 3.2](#)).
- **Heat Mitigation:** The Thermal Impact Mitigation Plan requires applicants outline 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](#)).
- **Environmental Impact:** The environmental impact assessment requires applicants to evaluate impacts of data center developments and to propose mitigation strategies for any adverse effects to air, soil, water quality, groundwater sources, wildlife and habitat, and greenhouse gas emissions. These are to be modelled under regular and adverse conditions such as drought, extended power outages and extreme heat. The requirement for an environmental impact assessment is a strong feature. Requiring analysis of impacts of development on critical environmental features and alternatives serves to ‘preserve natural resources in the land development process’ and promotes stewardship of the City’s and the region’s natural resources ([of Policy 3.1](#)).
- **Water and Sewer:** The proposed ordinance includes substantive utility and infrastructure review. Requiring evidence of water and sewage service, a water resources impact study, DRBC and DEP review where applicable, and an electric interconnection agreement reflects *FutureLV*’s emphasis on matching development intensity to available infrastructure ([of Policy 1.1](#)) and ‘minimizes impacts of development to protect the health, safety and welfare of the public’ ([of Policy 3.2](#)). The City may wish to include a statement indicating preference for closed-loop cooling systems that recirculate and reuse water. If so, definitions for closed-loop cooling and/or once-through cooling systems should be included in the definition section of the City’s ordinance.

- **Aesthetics:** The aesthetic 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](#)).

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

- **Power Supply:** The LVPC recommends adding requirements for any backup power equipment, such as minimizing air pollutant emissions in accordance with EPA Tier 4 emissions standards and requiring annual testing to minimize air quality impacts ([of Policy 3.2](#)). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety. The LVPC also recommends including requirements for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. The technology facility industry is moving in the direction of on-site generation, and the City can further ‘integrate efficiency measures and emerging technologies’, ‘improve the utility and mobility infrastructure of the region’ ([of Policy 1.1](#)), and ‘minimize and mitigate the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Noise:** When proper noise abatement measures are taken by the developer (such as installing sound attenuation walls), noise level at the property line can be significantly reduced. Data Centers are operational 24/7, so noise levels are unlikely to change throughout the day unlike other kinds of industrial uses. The LVPC recommends that the City consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential or other non-industrial uses ([of Policy 3.2](#)). Noise types e.g. ambient noise should also be defined in the City’s Noise Ordinance.

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)].

Sincerely,



Mary Grace Collins
Community and Regional Planner

cc: Jesse Sadiua, Chief Planner; Melissa Velez, Senior Planner; Brandon Jones, Planner



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Treasurer

BECKY A. BRADLEY, AICP
Executive Director

April 14, 2026

Stephen Nowroski, Manager
Moore Township
2491 Community Drive
Bath, PA 18014

**Re: Data Center Zoning Ordinance Amendment
Moore Township
Northampton County**

Dear Mr. Nowroski,

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, and we welcome your participation. Meeting participation details are below:

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The application proposes to amend the Moore Township zoning ordinance to define and regulate data centers as a conditional use in the Industrial (I) Zoning District.

LVPC supports Moore Township’s proactive effort to address an emerging land use before proposals arrive. That approach is consistent with *FutureLV: The Regional Plan’s* direction to guide the location and intensity of development, match development intensity with infrastructure capacity, and encourage an efficient development process responsive to regional needs ([of Policy 1.1](#)).

The Township’s proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

The following aspects of the proposed ordinance align with *FutureLV*:

- **Conditional Use:** Permitting data centers as a conditional use enables the Township to establish substantial submission criteria and thoroughly evaluate project impacts on a case-by-case basis, supporting ‘an efficient development process that is responsive to regional needs’ ([of Policy 1.4](#)).
- **Water and Sewer Impacts:** The proposed ordinance includes substantive utility and infrastructure review. Requiring evidence of water and sewage service, a water feasibility study, DRBC review where applicable, and an electric interconnection agreement reflects *FutureLV*’s emphasis on matching development intensity to available infrastructure ([of Policy 1.1](#)) and ‘minimizes impacts of development to protect the health, safety and welfare of the public’ ([of Policy 3.2](#)).
- **Buffering and Aesthetics:** The amendment includes meaningful impact-mitigation tools, including a 100-foot buffer yard, vegetated screening, limitations on exterior colors, requirements for emergency access, a fire protection plan, and a multi-phase acoustical study. These requirements support compatibility with surrounding uses and protection of community character and quality of life by ‘promoting context-specific design solutions’ ([of Policy 5.4](#)). Specifying that buffer yards and berms be planted with ‘native, carbon-sequestering, and climate-adaptive species’ is a best practice ([of Policy 3.4](#)).
- **Parking:** 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. The proposed parking requirement of one and a half spaces per on-site employee or one space per 8,000 square feet, whichever is lesser, 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](#)).
- **Cooling:** Preference for closed-loop cooling systems ‘protects the quality and quantity of surface water and groundwater’ ([of Policy 3.2](#)). It is recommended that a definition of both Closed-Loop and Once-Through Cooling be included in the Definition section of the ordinance.

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

- **Electronic Waste:** The Township may wish to include procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which supports the goal of *FutureLV* to ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’ ([of Policy 3.2](#)).

- **Power Supply:** The LVPC recommends that the Township also require applicants to document efforts made to maximize the use of renewable and/or clean energy for their electrical and cooling needs, either through on-site generation or verifiable power purchase agreements. These efforts ‘reduce greenhouse gas emissions’ and ‘promote energy conservation’ ([of Policy 3.4](#)). The LVPC also suggests adding requirements for any backup power equipment, such as minimizing air pollutant emissions in accordance with EPA Tier 4 emissions standards and requiring annual testing to minimize air quality impacts ([of Policy 3.2](#)). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety.
- **On-site Energy Generation:** The LVPC recommends including provisions for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. These are viable alternative and supplemental energy options for technology-based land uses which are highly energy-consumptive. By regulating on-site energy generation, the Township can further ‘integrate efficiency measures and emerging technologies’, ‘improve the utility and mobility infrastructure of the region’ ([of Policy 1.1](#)), and ‘minimize and mitigate the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Noise:** When proper noise abatement measures are taken by the developer (such as installing sound attenuation walls), noise level at the property line can be significantly reduced. Data Centers are operational 24/7, so noise levels are unlikely to change throughout the day unlike other kinds of industrial uses. The LVPC recommends that the Township consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential or other non-industrial uses ([of Policy 3.2](#)).
- **Environmental Impact:** The Township 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. Requiring analysis of impacts of development on critical environmental features builds on the ordinance’s existing directive for review from PADCNr to demonstrate no endangered species will be negatively impacted. 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](#)).

- **Heat Mitigation:** Because data centers generate significant heat, the Township 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](#)).

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)].

Sincerely,



Mary Grace Collins
Community and Regional Planner



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April xx, 2026

Lori Seese, Planning and Zoning Administrator
Lower Nazareth Township
623 Municipal Drive, Suite 220
Nazareth, PA 18064

**Re: Data Center Ordinance
Lower Nazareth Township
Northampton County**

Dear Ms. Seese,

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, and we welcome your participation. Meeting participation details are below:

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The application proposes to amend the Lower Nazareth Township to include definitions and regulations for Data Centers as a conditional use in the Manufacturing, Extraction and Processing TD-11 Zoning District.

LVPC supports Lower Nazareth’s proactive effort to address an emerging land use before proposals arrive. That approach is consistent with *FutureLV: The Regional Plan’s* direction to guide the location and intensity of development, match development intensity with infrastructure capacity, and encourage an efficient development process responsive to regional needs ([of Policy 1.1](#)).

Lower Nazareth’s proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

The following aspects of the proposed ordinance align with *FutureLV*:

- **Conditional Use:** Permitting digital infrastructure and hyper digital infrastructure facilities as a conditional use allows the Township 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](#))
- **Noise:** The proposed noise limit of 55 dba at the property line and the required noise/vibration impact studies serve to ‘minimize the environmental impacts of development to protect the health, safety and welfare of the public’ ([of Policy 3.2](#)).
- **Parking:** The proposed parking requirement of one space per on-site employee plus an additional space for every 50,000 square feet of building space supports best-practice contextual standards that match development intensity with appropriate infrastructure capacity ([of Policy 1.1](#)) and reduces impervious surfaces and protect water sources ([of Policy 3.3](#)).
- **Water and Sewer Impacts:** Requiring evidence of water and sewage service and an electric interconnection agreement reflects *FutureLV*’s emphasis on matching development intensity to available infrastructure ([of Policy 1.1](#)). The requirement to utilize public water and sewer ‘minimizes and mitigates the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Buffering:** Large buffer yards and robust plant material regulations for vegetated screening are strong features. These requirements support compatibility with surrounding uses and protection of community character and quality of life by ‘promoting context-specific design solutions’ ([of Policy 5.4](#)). Specifying that buffer yards and berms be planted with ‘native, carbon-sequestering, and climate-adaptive species’ is a best practice ([of Policy 3.4](#)).

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

- **Aesthetics:** Including aesthetic standards such as facade articulation and roofline and material variation help to minimize the visual impacts of the scale of buildings on neighboring properties and ‘promote context-specific design solutions’ ([of Policy 5.4](#)).
- **Cooling:** The Township requires that all data centers shall utilize closed-loop cooling systems. Preference for closed-loop cooling ‘protects the quality and quantity of surface water and groundwater’ ([of Policy 3.2](#)). It is recommended that a definition of both Closed-Loop and Once-Through Cooling be included in

the Definition section of the ordinance. Details specifying the cooling method proposed should be submitted as part of the conditional use approvals process.

- **Power Supply:** The LVPC recommends that the Township require applicants to document efforts made to maximize the use of renewable and/or clean energy for their electrical and cooling needs, either through on-site generation or verifiable power purchase agreements. These efforts ‘reduce greenhouse gas emissions’ and ‘promote energy conservation’ ([of Policy 3.4](#)). The LVPC also suggests adding requirements for any backup power equipment, such as minimizing air pollutant emissions in accordance with EPA Tier 4 emissions standards and requiring annual testing to minimize air quality impacts ([of Policy 3.2](#)). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety. The use of batteries as a source of redundant power should be encouraged wherever possible.
- **On-site Energy Generation:** The LVPC recommends including provisions for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. These are viable alternative and supplemental energy options for technology-based land uses which are highly energy-consumptive. By regulating on-site energy generation, the Township can further ‘integrate efficiency measures and emerging technologies’, ‘improve the utility and mobility infrastructure of the region’ ([of Policy 1.1](#)), and ‘minimize and mitigate the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Sustainable Infrastructure/Building Design:** The LVPC recommends that the Township encourage features like LEED certification and roof-mounted solar energy systems for Data Center buildings, which supports ‘sustainable building, site design and community design practices’ ([of Policy 3.4](#)).
- **Heat Mitigation:** Because data centers generate significant heat, the Township 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](#)).
- **Environmental Impact:** The Township 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. Requiring analysis of impacts of development on critical environmental features builds on the ordinance's existing directive for review from PADCNR to demonstrate no endangered species will be negatively impacted. 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](#)).

- **Electronic Waste:** The Township may wish to include procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which supports the goal of *FutureLV* to 'provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling' ([of Policy 3.2](#)).

Municipalities, when considering zoning ordinance amendments 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)].

Sincerely,



Mary Grace Collins
Community and Regional Planner



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

April xx, 2026

Bruce Beitel, Manager
Lower Macungie Township
3400 Brookside Road
Lower Macungie, PA 18062

**Re: Zoning Ordinance Amendment – Data Centers
Lower Macungie Township
Lehigh County**

Dear Mr. Beitel,

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, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting:</p> <p>April 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting:</p> <p>April 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>
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The application proposes to amend the Lower Macungie Township’s zoning ordinance to include definitions for “Data Center” and “Data Center Accessory Uses/Structures” and to include specific criteria to regulate them as a Conditional Use in the I-Industrial District, HE-Highway Enterprise District and ORLIC-Office, Research, Light Industrial, Center District.

LVPC supports Lower Macungie Township’s proactive effort to address an emerging land use before proposals arrive. That approach is consistent with *FutureLV: The Regional Plan’s* direction to guide the location and intensity of development, match development intensity with infrastructure capacity, and encourage an efficient development process responsive to regional needs [\(of Policy 1.1\)](#).

The Township’s proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

The following aspects of the proposed ordinance align with *FutureLV*:

- **Conditional Use:** Permitting data centers as a conditional use enables the Township to establish substantial submission criteria and thoroughly evaluate project impacts on a case-by-case basis, supporting ‘an efficient development process that is responsive to regional needs’ ([of Policy 1.4](#)).
- **Environmental Impact Study:** The requirement for an environmental impact assessment is a strong feature. Requiring analysis of nuisance impacts, stormwater, emissions, and energy consumption serves to ‘preserve natural resources in the land development process’ ([of Policy 3.1](#)).
- **Water and Sewer Impacts:** Requiring evidence of water and sewage service and an electric interconnection agreement reflects *FutureLV*’s emphasis on matching development intensity to available infrastructure ([of Policy 1.1](#)). The requirement to utilize public water and sewer ‘minimizes and mitigates the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Cooling:** The Township requires that all data centers shall utilize closed-loop cooling systems. Details specifying the cooling method proposed are to be submitted as part of the conditional use approvals process. Preference for closed-loop cooling ‘protects the quality and quantity of surface water and groundwater’ ([of Policy 3.2](#)). It is recommended that a definition of both Closed-Loop and Once-Through Cooling be included in the Definition section of the ordinance.
- **Buffering:** Large buffer yards and robust plant material regulations for vegetated screening are strong features. These requirements support compatibility with surrounding uses and protection of community character and quality of life by ‘promoting context-specific design solutions’ ([of Policy 5.4](#)). Specifying that buffer yards and berms be planted with ‘native, carbon-sequestering, and climate-adaptive species’ is a best practice ([of Policy 3.4](#)).

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

- **Electronic Waste:** The Township may wish to include procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which supports the goal of *FutureLV* to ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’ ([of Policy 3.2](#)).
- **Power Supply:** The LVPC recommends that the Township also require applicants to document efforts made to maximize the use of renewable and/or clean energy for their electrical and cooling needs, either through on-site

generation or verifiable power purchase agreements. These efforts ‘reduce greenhouse gas emissions’ and ‘promote energy conservation’ ([of Policy 3.4](#)). The LVPC also suggests adding requirements for any backup power equipment, such as minimizing air pollutant emissions in accordance with EPA Tier 4 emissions standards and requiring annual testing to minimize air quality impacts ([of Policy 3.2](#)). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety.

- **On-site Energy Generation:** The LVPC recommends including provisions for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. These are viable alternative and supplemental energy options for technology-based land uses which are highly energy-consumptive. By regulating on-site energy generation, the Township can further ‘integrate efficiency measures and emerging technologies’, ‘improve the utility and mobility infrastructure of the region’ ([of Policy 1.1](#)), and ‘minimize and mitigate the impacts of utility expansion associated with technological advancements’ ([of Policy 3.2](#)).
- **Noise:** When proper noise abatement measures are taken by the developer (such as installing sound attenuation walls), noise level at the property line can be significantly reduced. Data Centers are operational 24/7, so noise levels are unlikely to change throughout the day unlike other kinds of industrial uses. The LVPC recommends that the Township consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential or other non-industrial uses ([of Policy 3.2](#)).
- **Heat Mitigation:** Because data centers generate significant heat, the Township 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](#)).
- **Aesthetics:** Including aesthetic standards such as facade articulation and roofline and material variation help to minimize the visual impacts of the scale of buildings on neighboring properties and ‘promote context-specific design solutions’ ([of Policy 5.4](#)).
- **Parking:** 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. 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](#)).

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 & §306(a), Article VI§603(j)].

Sincerely,



Mary Grace Collins
Community and Regional Planner

cc:
Vince Tranguch, Deputy Director of Community Development

DRAFT



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
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April xx, 2026

Ed Carter, Manager,
Upper Milford Township
5671 Chestnut Street, PO Box 210
Old Zionsville, PA 18068

**Re: Zoning Revisions
Upper Milford Township
Northampton County**

Dear Mr. Carter,

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, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting:</p> <p>April 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting:</p> <p>April 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>
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The application proposes several amendments to the Upper Milford Township Zoning Ordinance. The amendments reorganized the document, updated the administrative provisions, revised the definitions, revised the table of allowed uses, separated the article for use regulations and added and modified new regulations, updated dimensional requirements, updated the buffer yards, revised temporary sign provisions, updated parking requirements, and updated road classifications.

The proposal amends the document to restructure several tables, the general formatting, and reorganizes the document to be clearer. It also includes several language changes to be more consistent with the Pennsylvania Municipality Planning Code. These changes help 'encourage an efficient development process that is responsive to regional needs' (of Policy 1.4).

The proposed amendment also adds a significant number of definitions and also removes several definitions to help clarify the ordinance. The LVPC commends the

additional definitions for agricultural uses which helps ‘preserve farmland to maintain rural character and provide open space’ (of Policy 3.3). The definitions also included updates to the solar uses, No Impact home-based businesses, shade trees, truck terminals, vehicle fueling and convenience stores, wind energy and turbines, and other uses. The ordinance also removed several depreciated definitions like unit for care of relative and some family definitions, which ‘increases social and economic access to daily needs for all people’ (of Policy 5.2).

The proposed amendment also changes several of the allowed uses in the table. Specifically, the ordinance makes several changes to the residential allowed areas, and commends the proposed changes to allow stack duplexes in the RS-R zone and allow residential conversions in the VR zone. The amendment also removed single family homes from being allowed in commercial areas, which the LVPC recommends the township consider allowing single family housing within the commercial area to help promote walkable neighborhoods and ‘encourage an interconnected street, sidewalk, and trail network.’ (of Policy 2.2). To further this goal, the township should also consider allowing mixed use developments in the C – Commercial Zone.

Additionally, the proposed additional allowed uses supports efforts to alleviate the regional housing shortage. According to the Lehigh Valley Housing Dashboard, Upper Milford is experiencing a shortage of 94 housing units today, and an additional 789 units are needed by the year 2050 to keep up with the Township’s anticipated population growth. The proposal helps meet the Township’s housing demand while increasing attainable housing opportunities (of Policy 4.5).

The amendment also proposes adding several additional regulations to the ordinance to address the updated definitions and uses. Several of these uses help ‘increase social and economic access to the daily needs for all people (of Policy 5.2) like removing several requirements for truck terminals and treatment centers.

The ordinance also added additional regulations for solar energy systems. The Penn State Marcellus Center for Outreach and Research developed a Municipal Officials’ Guide to Grid-Scale Solar Development in Pennsylvania. This comprehensive resource provides best practices for municipalities regulating grid-scale solar development. One recommendation the LVPC suggests the township consider is establishing a maximum panel height between 10 and 20 feet to limit visibility from neighboring properties and ‘promote context-specific design solutions’ (of Policy 5.4).

Additionally, the LVPC recommends the township consider requiring that inverters, transformers, batteries, and other noise-generating equipment associated with the system be located toward the center of the site to reduce impacts on adjacent uses. The township could also require a noise study and establish maximum sound thresholds. These measures would help ‘minimize the environmental impact of development’ (of Policy 3.2). The LVPC also recommends the inclusion of ‘native, climate-adaptive landscaping’ (of Policy 3.4) for the stormwater management provisions. The LVPC also

commends the inclusion of the area under stormwater management as impervious surface to help 'manage the rate, volume, and quality of storm runoff' (of Policy 3.2).

The LVPC also recommends the township consider adding additional protections to the agricultural areas to help maintain prime farmland which is often the most desirable location for solar development as it is flat areas with little existing buildings to limit development. These amendments could limit the amount of development, help maintain the existing farm infrastructure to help with the decommissioning process, or help blend agricultural uses with solar through agrivoltaics. These amendments would help 'preserve farmland to maintain rural character and provide open space' (of Policy 3.3).

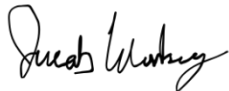
Additionally, in D-21 Auto Repair/Body Shop or Auto Service Station additional requirements, section (c) is missing.

The proposal also modifies the existing buffer yard requirements and provides additional buffering on each side for every use and helps clarify the requirements, which helps 'facilitate an efficient development process' (of Policy 1.4). Additionally, the LVPC recommends the requirement for native, climate-adaptive landscaping' (of Policy 3.4) in the buffer yard.

The ordinance also updates the total parking spaces required by removing the per employee requirement and replacing the requirements with a general gross square foot measurement for most uses, which would help reduce the total amount of impervious surface which 'minimizes the environmental impact of development' (of Policy 3.2), and 'right-size transportation infrastructure projects' (of Policy 2.2). The ordinance amendments also would modify several of the road classifications. The LVPC recommends the township consider aligning their functional road classifications with the Pennsylvania Department of Transportation Road classifications to 'facilitate an efficient development process' (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 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

Sincerely,



Jacob Weinberg
Community and Regional Planner

cc:

Marc Fisher, Township Solicitor;
Brian Miller, Township Planning Coordinator/SEO;
Ott Consulting, Inc, Township Engineer.



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

April xx, 2026

Ed Carter, Manager,
Upper Milford Township
5671 Chestnut Street, PO Box 210
Old Zionsville, PA 18068

**Re: Subdivision and Land Development Revisions
Upper Milford Township
Northampton County**

Dear Mr. Carter,

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, and we welcome your participation. Meeting participation details are below:

<p>LVPC Comprehensive Planning Committee Meeting:</p> <p>April 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>	<p>LVPC Full Commission Meeting:</p> <p>April 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings</p>
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The application proposes amending the Subdivision and Land Development Ordinance (SALDO) to modify some definitions, update the checklists, revise recreation land provisions, update construction standards, and update the landscaping provisions.

First, the ordinance modifies several of the definitions to cite the specific relevant sections of the laws that they reference rather than referencing an entire law, allowing for easier cross referencing and 'encourage an efficient development process that is responsive to regional needs' (of Policy 1.4). The proposal also includes several definitions that require the user to reference the zoning ordinance and since the township is updating both simultaneously, the definitions could be aligned to be the same across both, saving on cross reference and furthering Policy 1.4.

Next, the ordinance updated several checklist requirements like adding requirements for additional information for curved lines on plans, decreasing the distance parcels required to be marked on the plan (from 150 feet down to 100), and adding more flexibility in the contour intervals used when dealing with different slopes. All of these

requirements should make it easier for organizations to create and review plans and ‘encourages an efficient development process’ ([of Policy 1.4](#)). The proposal would also allow the townships floodplain administrator to approve development within the 100 year floodplain, helping ‘enhance planning and emergency response efforts among emergency management personnel’ ([of Policy 5.1](#)).

The proposal also amended the ordinance’s recreation land provisions. One additional provision specified that lands with stormwater management facilities or lands encumbered by any existing or proposed right-of-way or easements did not count towards the recreation land to be preserved per development. The LVPC recommends the township consider modifying the provision to allow some green infrastructure like bioswales and rain gardens to count towards the open and rec spaces as they would blend in with the natural surrounding and ‘minimize environmental impacts of development’ ([of Policy 3.2](#)).

The proposed amendment would also simplify the calculation for the total amount of recreation land necessary per unit from a table requiring more recreation land per unit if none existed, to a flat rate of 1,250 square feet per unit. This would lower the total cost per unit to develop the additional greenspace rather than paying the fees-in-lieu and help ‘create community spaces that promote physical and mental health’ ([of Policy 5.3](#)).

In addition, the proposal amends the construction standards to expand what qualifies as an impact of run off when grading a site which helps ‘manage the rate, volume, and quality of storm runoff’ ([of Policy 3.2](#)). The proposal also removed several provisions relating to access management. The LVPC commends the removal of the provision calling for some shared driveways, which can create issues for during winter maintenance and slow emergency vehicle access and the provision’s removal ‘enhances planning and emergency response efforts’ ([of Policy 5.1](#)).

The section also removed the requirement for larger driveways when accessing a collector or arterial road, which the LVPC recommends the township reconsider or consider adding a provision leaving it to the discretion of the township engineer. The proposal also removes a provision allowing the township engineer or PennDOT to require a medium as a part of the project. Both strategies can, when used appropriately, help increase road safety by giving more time for individuals to react and help slow traffic respectively. The ordinance did add a provision requiring all sight triangles meet the PennDOT standard, which in tandem with the previous strategies, ‘enhance incident management strategies’ ([of Policy 2.2](#)).

Additionally, the ordinance updates the cartway designs to make them all uniform regardless of curbing and sidewalks with Arterial and collector roads having 32 foot cartways and local roads having 36-foot cartways. The ordinance defines cartways as the paved portion of a street used for vehicular travel, meaning individual lanes could be 16 to 18 feet wide. Both the Federal Highway Administration and National Association of City Transportation Officials recommend lanes between 10 and 12 feet wide, as wider lanes can encourage drivers to speed and attempt to change lanes, which can increase

likelihood of accidents. The LVPC recommends the township consider either reducing the cartways down to 24 feet, or adding requirements for sidewalks within the larger cartway to allow for wide sidewalks which would allow for greater walkability 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 ordinance also updates the landscaping provisions as the concurrent zoning update shifted some of the requirements outlined there to the subdivision and land development ordinance, while also improving the existing provisions. Specifically, the LVPC commends the township's inclusion of elm streets that are resistant to Dutch Elm Disease while excluding other elms that are potentially invasive like the Siberian elm. The ordinance also addresses another potential invasive by modifying the list of allowed oaks from all oaks to a specific list, not including the sawtooth oak, another invasive tree. The ordinance improves upon its existing planting requirements by lowering the allowed number of same species trees within planting requirements to allow only 25% of one type of tree. All of these provisions help 'reduce climate change impacts through mitigation and adaptation' by 'using native, climate-adaptive and carbon sequestering landscaping' ([of Policy 3.4](#)).

The landscaping provisions also include updated requirements for stormwater management facilities which help 'manage the rate, volume, and quality of storm runoff' ([of Policy 3.2](#)). Another provision added requirements for Parking lot landscaping which would reduce the heat island effect and requiring additional plantings for off-street parking, which the LVPC commends for 'minimizing the environmental impact of development' ([of Policy 3.2](#)).

The other municipalities in the Southwestern Lehigh Comprehensive Plan are being included in this review letter 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 1§105, Article III§303, §304 & §306(a), Article VI§603(j)].

Sincerely,



Jacob Weinberg
Community and Regional Planner

cc:

Marc Fisher, Township Solicitor; Brian Miller, Township Planning Coordinator/SEO; Ott Consulting, Inc, Township Engineer; Stephen Nemeth, Alburtis Township Manager; Shane Pepe, Emmaus Township Manager; Bruce Beitel, Lower Macungie Township Manager; Emily Fucci, Lower Milford Township Manager; John Brown, Macungie Township Manager.

FUTURELV THE REGIONAL PLAN



STRATEGY LABS SCHEDULE

- **Monday, May 11th, 2026, 3-5 PM @ LVPC Office**
 - **Topic: Economy-** How land use, education, workforce and community values converge to shape our future quality of life and economy.
 - ❖ **Roundtable Discussions:** Workforce, Economics of Land Use, Community Enhancements, Education, Mineral Extraction, Agriculture/Farmlands Industry
- **Monday, May 11th, 2026, 6:30-8:30 PM @ LVPC Office**
 - **Topic: Municipal Development and Land Use: Boroughs and Rural Areas;** This Strategy lab will be in partnership with Small Cities Lab and the Greater Lehigh Valley Chamber of Commerce- How municipal development and land use shape the challenges and opportunities facing our boroughs and rural communities.
 - ❖ **Roundtable Discussions:** Roundtable Discussions with Local Governments from Boroughs and Rural Communities
- **Tuesday, May 12th, 2026, 9-11 AM @ LVPC Office**
 - **Topic: Municipal Development and Land Use: Cities and Suburbs-** How municipal development and land use shape the challenges and opportunities facing our boroughs and rural communities.
 - ❖ **Roundtable Discussions:** Roundtable Discussions with Local Governments from Cities and Suburbs
- **Wednesday, May 13th, 2026, 9-11 AM @ LVPC Office**
 - **Topic: Transportation -** How roads, bridges, transit, and multimodal systems must evolve to support the mobility needs of a growing Lehigh Valley.
 - ❖ **Roundtable Discussions:** Transit, Highway/Bridge, Multimodal, Future Forces

- **Wednesday, May 13th, 2026, 1-3 PM @ LVPC Office**
 - **Topic: Arts and Culture** – How arts, culture, historic sites, parks and recreation shape our quality of life and give the Lehigh Valley its unique identity.
 - ❖ **Roundtable Discussions:** Arts + Culture, Tourism, Parks and Recreation, Historic Sites + Preservation

- **Monday, May 18th, 2026, 3-5 PM @ LVPC Office**
 - **Topic: Environment** – How the region's strength and vitality depend on protecting and managing its environment for long-term sustainability and quality of life, and how this becomes more complex as the region grows.
 - ❖ **Roundtable Discussions:** Climate Action, Resiliency, Natural Resources

- **Tuesday, May 19th, 2026, 3-5 PM @ LVPC Office**
 - **Topic: Community Infrastructure** - How this growing region must expand and modernize the capacity and resilience of core infrastructure systems—including municipal assets, water, sewer, stormwater, solid waste, gas, electric, and communications—to support future development.
 - ❖ **Roundtable Discussions:** Sewer + Water, Stormwater, Solid Waste Management, Municipal Assets, Gas, Electric, Communications Utilities.

- **Wednesday, May 20th, 2026, 2-4 PM @ LVPC Office**
 - **Topic: Care and Crisis** – How strengthening our hazard mitigation, emergency services and health care systems is integral to regional preparedness and community well-being.
 - ❖ **Roundtable Discussions:** Hazard Mitigation, Emergency Services, Health Care

- **Thursday, May 21st, 2026, 9-11 AM @ LVPC Office**
 - **Topic: Trends and Future Forces** – How rapidly changing technology and societal preferences require us to anticipate change and adapt to support regional development and mobility.
 - ❖ **Roundtable Discussions:** Current and Future Societal Trends