Lehigh Valley Planning Commission

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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

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, November 17, 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 – Upper Mount Bethel Township – Slate Belt Technology Campus Design 1 (JS)
2. *ACTION ITEM*: Land Use of Regional Significance – Upper Mount Bethel Township – Slate Belt Technology Campus Design 2 (JS)
3. *ACTION ITEM*: Land Use of Regional Significance – City of Bethlehem – Bethlehem Earth (JS)
4. *ACTION ITEM:* Land Use of Regional Significance – Forks Township - 605 Kuebler Road (JW)
5. *ACTION ITEM*: Zoning Map Amendment – Lower Mount Bethel Township – Martins Creek LLC Private Petition (JS)
6. *ACTION ITEM*: Subdivision and Land Development Ordinance – Palmer Township – Comprehensive Update (JW)
7. *ACTION ITEM*: Zoning Ordinance Amendment – City of Bethlehem – Health Care Adaptive Reuse in Residential Districts (JW)

Next Comprehensive Planning Committee Meeting:
December 15, 2026, at 12:00 noon

Lehigh Valley Planning Commission

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JUDY HALDEMAN
Vice Chair

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November XX, 2026

Nick Graziano, Manager
Upper Mount Bethel Township
387 Ye Olde Highway
Mount Bethel, PA 18343

Re: Slate Belt Technology Campus (Design 1, West & East) –
Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County

Dear Manager Graziano:

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

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
November 17, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	November 19, 2026, at 7:00 PM Virtual https://lvpc.org/lvpc-meetings

Background
Slate Belt Holdings, LLC proposes to develop the Slate Belt Technology Campus, also known as the River Pointe Data Center Campus, on properties along River Road, Marshfield Drive, Demi Road and Potomac Street in Upper Mount Bethel Township. The proposed development consists of 29 data center buildings, including 23 west of River Road and six east of River Road. The applicant identifies approximately 3.3 million square feet of building footprint and an ultimate electrical demand of up to 2,100 megawatts (MW).

The campus is proposed to include substations, switchyards, backup generators, battery storage systems, cooling equipment, parking, loading areas, internal roadways, stormwater facilities and water and sewer infrastructure. The plans also identify an area for a potential on-site power plant and battery energy storage facility. The applicant anticipates approximately 1,200 employees, including full-time contractors, with a maximum shift of approximately 600 employees. Construction would occur in phases based on the availability of electrical capacity and other infrastructure.

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The site was previously proposed for the River Pointe Logistics Center, a planned industrial park consisting of approximately 5.9 million square feet of industrial development. While the applicant proposes to use portions of the previously approved industrial park's grading, roadway and stormwater designs, the proposed data center campus introduces different infrastructure requirements and operational impacts that warrant further evaluation.

The LVPC also received a separate application for Slate Belt Technology Campus (Design 2, West & East), which proposes an alternative development configuration for the same site. That application is under review separately. The LVPC recommends that the applicant clarify the relationship between the two designs and identify which buildings, infrastructure and improvements would be constructed under each alternative. Any improvements shared by or necessary to either design should be clearly identified.

Existing Conditions



Google Aerial Imagery

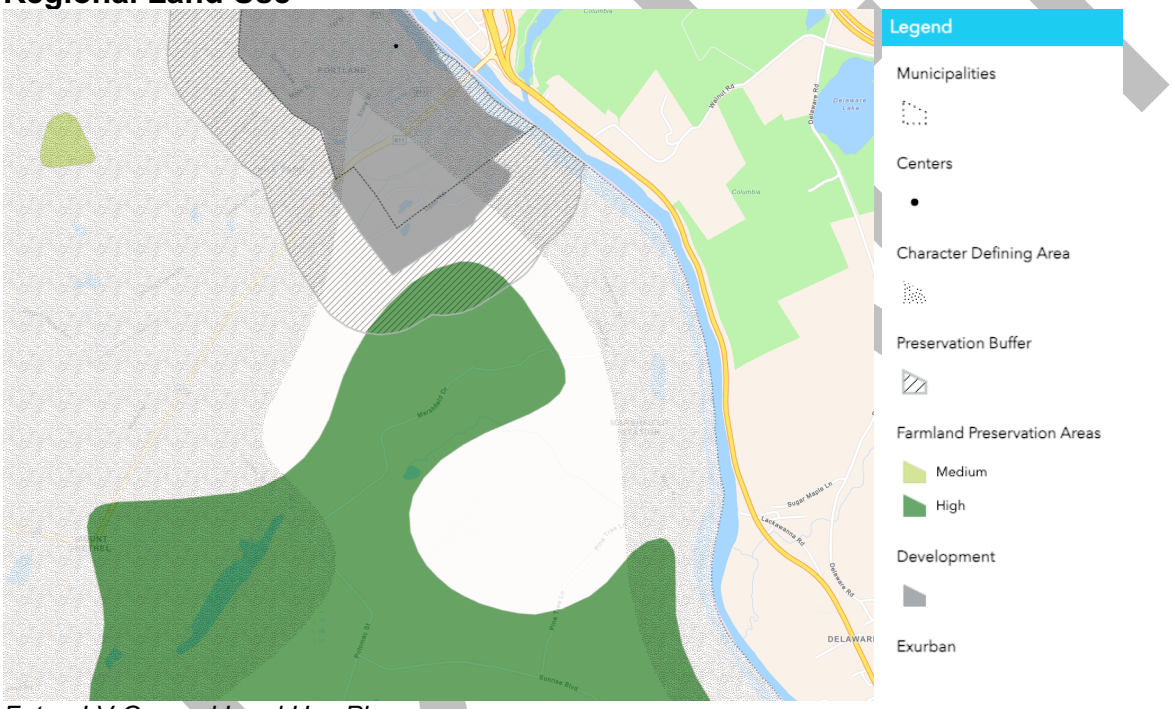
The site is located in a rural area south of Portland Borough and west of the Delaware River. Surrounding land uses include existing industrial facilities along River Road, agricultural lands, woodlands, residential properties and the Upper Mount Bethel Community Park. The site's landscape and environmental setting are important regional considerations. The submitted natural resource and existing conditions plans identify

streams, wetlands, steep slopes, areas of dense vegetation and brush, and environmentally sensitive habitat areas.

The area also contains significant scenic and recreational resources. River Road and Route 611 are identified as Scenic Drives in the *FutureLV Parks, Outdoor Recreation, Open Space and Scenic Plan*, and the Delaware River is a federally designated Wild and Scenic River. *FutureLV* also identifies a proposed regional trail connection along River Road, which could connect existing and planned trails in Portland Borough to the north and Lower Mount Bethel Township to the south.

The LVPC recognizes the site's industrial zoning and previous approvals. However, its location, surrounding communities and sensitive natural resources require careful consideration of the proposed development's regional impacts. The LVPC offers the following recommendations to improve consistency with *FutureLV: The Regional Plan*.

Regional Land Use



FutureLV General Land Use Plan

Design 1 proposes 29 data center buildings and associated infrastructure on both sides of River Road. The campus area includes lands identified for High Priority Farmland Preservation, Preservation Buffer and Exurban uses on the *FutureLV: The Regional Plan* General Land Use Plan. Character-Defining Areas are also mapped within the surrounding landscape, including along the Delaware River corridor.

FutureLV establishes a conservation-first approach to regional land use planning. Farmland Preservation areas are recommended to remain predominantly agricultural, while Exurban areas are generally recommended for rural uses and limited development. Natural resource conservation and farmland preservation are strongly

preferred within Preservation Buffer areas, where development suitability should be evaluated against the Plan's development criteria. These include infrastructure capacity, proximity to existing development and protection of high-priority natural resources.

The proposed conversion of lands identified for farmland preservation to a large data center campus does not align with *FutureLV's* recommendations to preserve agricultural lands and maintain rural character (Policies 1.1, 1.3 and 3.3). The LVPC recognizes that the proposal builds upon prior industrial park approvals. However, those approvals do not change the regional preservation recommendations. The LVPC recommends identifying where buildings, equipment yards, roads, grading and utility improvements overlap mapped preservation areas and evaluating opportunities to retain agricultural land, woodlands and connected open space. Development near the Delaware River corridor should preserve natural and scenic resources and minimize changes to the surrounding landscape (Policies 3.1 and 3.2).

Economic Development
The proposed use would occupy property previously planned for an industrial park within the Township's industrial zoning framework. The development has the potential to expand the regional technology sector, create employment opportunities and contribute to the local tax base. The use of an established industrial development framework and coordinated infrastructure planning can support economic development and infrastructure efficiency (of Policies 1.1 and 4.2).

Development Intensity and Electrical Infrastructure
The proposed campus would require up to 2,100 MW of electricity at full build-out. The project narrative identifies agreements with FirstEnergy for 1,020 MW, with additional capacity anticipated through utility service and potential onsite generation. The final configuration and operating characteristics of several major electrical systems have not been established.

The Master Site Plan (CS-200) identifies substations and switchyards throughout the development, and Building Pad 10B identifies a proposed power plant and battery energy storage facility. The narrative describes onsite generation as a potential future component. The LVPC recommends clarifying whether these facilities are included in the current application or would require separate future land development approvals. The applicant should provide a coordinated electrical infrastructure and phasing plan identifying the locations, proposed capacities and functions of substations, switchyards, generators, battery energy storage facilities and any on-site power plant. The plan should distinguish emergency backup equipment from equipment intended to provide electricity during normal operations. It should also identify the infrastructure required for each development phase and the anticipated responsibilities for construction, operation and maintenance.

Given the scale of the proposed demand, the LVPC encourages continued coordination with FirstEnergy, the Township and applicable state and federal regulatory agencies. The applicant should document the improvements necessary to serve the campus, their

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anticipated timing and how associated costs will be addressed. These recommendations support matching development intensity with sustainable infrastructure capacity and coordinating land use decisions across municipal boundaries (of Policies 1.1 and 1.4).

The applicant identifies a target Power Usage Effectiveness (PUE) of approximately 1.25 and proposes to coordinate electrical service with the utility provider as development phases advance. The LVPC encourages continued pursuit of energy-efficient equipment, renewable energy opportunities and other measures that reduce resource consumption (of Policy 3.4).

Natural Resources
The proposed development plans identify streams, wetlands, steep slopes and environmentally sensitive habitat areas, including mapped bog turtle habitat buffers. Although this project is within the Township's Industrial Zoning District, given the preference of FutureLV to take a conservation-first approach to development, the LVPC strongly recommends ensuring that the site design is configured to avoid disturbing sensitive natural features. The applicant should provide an updated environmental impact assessment identifying the existing condition of each resource, previous and proposed disturbance, and measures to avoid, minimize or mitigate impacts. The assessment should distinguish improvements authorized under previous approvals from changes proposed with the current application. These measures support conserving natural resources and minimizing environmental impacts of development (of Policies 3.1 and 3.2).

Community Compatibility, Scenic Resources and Landscaping
The plans identify proposed building heights that are 80 feet tall, substantially changing the scale and appearance of development in the surrounding rural landscape. Buildings, cooling equipment, electrical infrastructure and outdoor equipment yards may be visible from River Road, Route 611, the Township Community Park, neighboring properties and locations across the Delaware River.

The LVPC recommends providing building elevations and visual simulations from representative public viewpoints, including the Community Park, scenic roadways and river corridor. These should depict buildings and major equipment at their proposed heights, with landscaping shown at installation and maturity.

The project narrative identifies landscaped berms, native plantings, equipment screening and full-cutoff lighting. The LVPC supports these measures and recommends ensuring that the final plans demonstrate their effectiveness. Particular attention should be given to the landscape berm adjacent to the Community Park, the visibility of electrical and mechanical equipment, and the protection of scenic views along River Road.

The applicant should also incorporate building materials, façade treatments and equipment screening that reduce the visual scale of the development. Coordination with

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the National Park Service, Lower Delaware Wild and Scenic River Management Council and neighboring municipalities is encouraged where scenic impacts extend beyond the Township.

These measures support development that complements the surrounding environment and community character (of Policies 3.2 and 5.4).

Regional Trail Connection and Multimodal Accessibility
FutureLV identifies a conceptual regional trail connection along River Road. This corridor provides an important connection between existing and proposed trails in Portland Borough and Lower Mount Bethel Township. The LVPC previously recommended connecting the River Pointe development's internal walking trails to River Road and the surrounding trail network. The current proposal provides an opportunity to advance this regional connection.

The LVPC recommends that the applicant coordinate with the Township, LVPC and surrounding municipalities to identify and preserve a feasible continuous trail corridor along the River Road frontage. Where appropriate, the applicant should incorporate a trail alignment or easement into the land development plans, with consideration of roadway crossings, utility infrastructure, environmental constraints and future connections beyond the site.

The development should also provide safe pedestrian connections between building entrances, parking areas, internal open spaces and the regional trail corridor. Bicycle parking and clearly designated pedestrian routes should be incorporated where appropriate.

The LVPC also encourages coordination with the Lehigh and Northampton Transportation Authority (LANTA) regarding potential future transit service. A designated passenger pick-up and drop-off area, and space for a future transit stop with appropriate pedestrian access, would improve transportation options for employees. These improvements support multimodal transportation and regional recreational connectivity (of Policies 2.2, 5.2 and 5.3).

Transportation Impacts and Roadway Infrastructure
The applicant submitted a Transportation Impact Study (TIS) prepared by Dynamic Traffic, dated October 2026. The study uses Institute of Transportation Engineers (ITE) Land Use Code 160, Data Center, to estimate traffic generated by the proposed development.

The LVPC recognizes that data centers generally generate fewer routine truck and employee trips than similarly sized warehouse and distribution facilities. However, several transportation issues remain.

Trip Generation and Construction Traffic

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Compared with the previously proposed logistics campus, data center operations are expected to involve fewer routine truck deliveries and employee trips. This change has the potential to reduce some of the freight-related transportation impacts previously identified by the LVPC. The proposed dedicated turn lanes and coordinated site access improvements also support transportation safety and efficiency, subject to the refinements discussed above (of Policies 2.2 and 2.4).

Note that the proposed square footage exceeds the range of data represented in the ITE trip generation dataset for data center land uses. The LVPC recommends that the Township evaluate trip estimates using document anticipated staffing, shift schedules, deliveries and other operational assumptions.

The project narrative also references a construction traffic management plan that was not included in the materials provided for this review. The LVPC recommends providing this plan with estimated construction vehicle trips, truck and oversized-load routes, delivery schedules, staging areas and measures to minimize impacts on neighboring communities and roadways. Construction activity should be evaluated separately from routine operations (of Policy 2.2).

Regional Roadway Improvements and the Norfolk Southern Rail Bridge
The TIS identifies roadway improvements at the Portland-Columbia Bridge approaches, including intersection realignments and coordinated traffic signals. Without mitigation, the southbound ramp/bridge approach intersection is projected to experience level of service F for an eastbound movement during the weekday evening peak hour. The LVPC recommends documenting the status of these improvements, required agency approvals, implementation responsibilities and the development phases they are intended to serve.

The Norfolk Southern railroad bridge over Delaware Avenue/Route 1039, north of the development, remains a significant transportation constraint previously identified by the LVPC. The existing vertical clearance of approximately 13 feet, 8 inches leaves limited clearance for large commercial vehicles. The narrow roadway beneath the bridge also presents potential conflicts between opposing trucks.

The LVPC strongly recommends continued coordination among the applicant, Norfolk Southern, PennDOT, Portland Borough, Upper Mount Bethel Township and the Pennsylvania Public Utility Commission to evaluate feasible improvements. The study should address vertical and horizontal clearances, roadway drainage and flooding, utility lines beneath the bridge, and the types of vehicles expected to serve the campus. Feasible safety measures and improvements should be identified and coordinated with development phasing.

The TIS also proposes a 250-foot southbound right-turn lane at River Road and Demi Road, although the available length may be constrained by the railroad bridge. The LVPC recommends confirming the feasibility of the proposed improvement with the

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responsible roadway agencies. These recommendations support a safe and efficient transportation network (of Policies 2.2 and 2.4).

Site Access, Loading and Internal Circulation
The project narrative identifies 27 loading docks, but the locations and configurations of the docks are not clearly shown on the site plans. The LVPC recommends depicting loading areas and providing sufficient truck staging or parking to prevent delivery vehicles from stopping along River Pointe Drive or other access roadways.

A vehicle-turning analysis should be provided to demonstrate that delivery trucks, emergency vehicles, refuse trucks and other service vehicles can safely navigate the internal road network. The plans should also identify appropriate site access controls, wayfinding and circulation routes.

New Marshfield Drive is identified for dedication to Upper Mount Bethel Township. The LVPC recommends confirming responsibility for roadway maintenance, snow removal and long-term infrastructure upkeep following dedication. The applicant is also encouraged to provide electric vehicle charging infrastructure for employees and appropriate electrical connections at loading areas to reduce unnecessary vehicle idling.

Water Supply, Wastewater and Cooling Systems
The applicant proposes to extend public water and sanitary sewer service from Portland Borough systems. The project narrative estimates approximately 35,000 gallons per day of domestic water use and an equivalent volume of wastewater. The campus would also include approximately five million gallons of on-site fire protection water storage.
The applicant proposes closed-loop cooling without evaporative cooling towers. The cooling system would require an initial fill from an approved off-site source, with the water then recirculated during operation. The LVPC supports this approach as a means of reducing ongoing demand on local water resources (of Policies 3.1 and 3.2).

The applicant should document the volume and source of the initial cooling-system fill, anticipated replenishment needs, the timing and rate of filling fire-water storage tanks, and any additional water demand associated with power generation or other equipment. These demands should be evaluated separately from routine domestic consumption.

The LVPC recommends obtaining documentation from the appropriate water and wastewater service providers addressing available capacity, necessary system improvements and the anticipated schedule for service extensions. The applicant should also coordinate with PADEP, the Delaware River Basin Commission and other applicable agencies regarding required approvals.

Act 58 of 2026, effective December 7, 2026, clarifies that the water supply evidence required under MPC §503.1 must be provided before final subdivision and land development approval. These measures support reliable infrastructure and the conservation of water resources (of Policies 1.1, 3.1 and 3.2).

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Noise, Vibration, Heat and Air Quality
The campus would operate continuously, with potential exterior noise sources including chillers, heat-rejection equipment, transformers, generators and other electrical infrastructure. The project narrative states that a site-specific acoustical study will be prepared.

The LVPC recommends providing a cumulative noise study for the full campus that evaluates normal operations, generator testing and other reasonably foreseeable operating conditions. The study should assess sound levels at property lines and nearby sensitive receptors, including residential properties and the Community Park, and address low-frequency and tonal noise where applicable.

The final design should identify equipment locations and demonstrate how screening, enclosure, orientation and sound attenuation will achieve applicable noise standards. Post-construction sound testing is also recommended to verify performance once the facilities are operational.
The applicant should additionally identify the expected locations and impacts of heat rejection equipment, and provide information about the number, capacity, fuel types, operating schedules and anticipated emissions of generators and any proposed on-site power plant. Required PADEP air quality permits and associated operating conditions should be coordinated with the Township's land development review.

These measures support minimizing environmental and public health impacts and maintaining compatibility with surrounding land uses (of Policies 3.2 and 5.3).

Emergency Access and Public Safety
The proposed campus includes high-voltage equipment, battery systems, generators, cooling fluids and extensive internal circulation infrastructure. The scale and complexity of the development require coordinated emergency-response planning.

The plans identify two emergency connections to Potomac Street and one to River Road. The LVPC recommends confirming that these connections are suitable for emergency vehicles, remain accessible in all weather conditions, and are clearly identified through signage and access controls.

The internal road network should also be evaluated for redundant emergency access to individual building pads. Particular attention should be given to buildings served by long driveways or limited access points, including the southern development areas. Clear building identification and wayfinding signage are necessary to help emergency responders locate incidents quickly.

The applicant should coordinate with the Township, Northampton County emergency management personnel, local fire and emergency medical service providers and applicable utilities to prepare a campus-wide emergency response plan. The plan should address fire suppression, fire-water storage, emergency shutoffs, battery storage hazards, fuel and chemical inventories, spill response, access to electrical facilities and

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evacuation routes. Emergency responder training and facility orientation should occur before operations begin.

This coordination supports safe community design, effective emergency services and protection of critical infrastructure (of Policy 5.1).

Coordinated Plan Review
The current submission relies on infrastructure and design concepts developed through the previous River Pointe Logistics approvals. The LVPC recommends that the applicant provide a coordinated summary identifying which previously approved improvements remain applicable, which have been completed, and which are being revised or replaced.

The applicant also indicates an intent to maintain communication with the Township and community as the project advances. Continued engagement and public availability of relevant technical information can support informed land use decisions and regional coordination (of Policy 1.4). The LVPC also encourages continued communication with Portland Borough, Lower Mount Bethel Township and other affected communities regarding construction, infrastructure improvements and the development's regional impacts (of Policy 1.4).

Conclusion
The Slate Belt Technology Campus represents a substantial change from the previously proposed logistics development. The proposed use has the potential to reduce the previously anticipated freight traffic and water consumption while creating new economic opportunities. However, the campus's scale, electrical demand, supporting infrastructure and proximity to sensitive natural, scenic and recreational resources present significant regional planning considerations.

The LVPC encourages the applicant to provide a written response identifying how the review recommendations will be addressed. This will help the Township, reviewing agencies and surrounding communities understand the status of outstanding issues and any proposed mitigation.

Municipalities, when considering land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I §105, Article III §§303, 304 and 306(a), and Article VI §603(j)]. The LVPC review does not include an in-depth examination of the plans relative to municipal subdivision and land development ordinance requirements, which are addressed through the Township's review.

The LVPC has copied appropriate agencies and neighboring municipalities to support coordinated land use decisions across municipal boundaries (of Policy 1.4).

Sincerely,

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Jill Seitz, AICP
Director of Regional Planning + Policy

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Lehigh Valley Planning Commission

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November XX, 2026

Nick Graziano, Manager
Upper Mount Bethel Township
387 Ye Olde Highway
Mount Bethel, PA 18343

Re: Slate Belt Technology Campus (Design 2, West & East) –
Land Use of Regional Significance
Upper Mount Bethel Township
Northampton County

Dear Manager Graziano:

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

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
November 17, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	November 19, 2026, at 7:00 PM Virtual https://lvpc.org/lvpc-meetings

Background
Slate Belt Holdings, LLC proposes the Slate Belt Technology Campus, also referred to as the River Pointe Data Center Campus, along River Road, Marshfield Drive, Demi Road and Potomac Street in Upper Mount Bethel Township. Design 2 includes six data center buildings, with five west of River Road and one east of River Road. The project narrative identifies approximately 1.4 million square feet of building footprint, 35-foot building heights. The project also includes electrical substations, switchyards, standby generators, battery systems, cooling equipment, internal roads, parking and loading areas, water and sewer connections, fire protection facilities, and stormwater infrastructure. The eastern development area also contains proposed power generation and battery energy storage facilities.

The applicant identifies an ultimate electrical demand of up to 2,100 megawatts (MW), including 1,020 MW currently under agreement with FirstEnergy and additional capacity anticipated through grid service and potential on-site generation. Other proposed characteristics include approximately 600 employees, 17,500 gallons per day of

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domestic water and wastewater demand, and up to three million gallons of fire protection water storage.
Design 2 represents an alternative to Slate Belt Technology Campus (Design 1, West & East), a separate application submitted concurrently for the same properties. Both proposals are under LVPC review. The Township and applicant should clearly identify the development alternative being pursued and ensure that approvals, infrastructure commitments and phasing are consistent with the selected design.

The property was previously proposed for the River Pointe Logistics Center, a planned industrial park containing approximately 5.9 million square feet of industrial development. The LVPC reviewed several applications associated with that proposal in 2023. Those reviews identified significant regional considerations involving roadway limitations, natural resources, scenic character, public infrastructure and emergency services. Design 2 retains elements of the previously planned industrial park, including portions of the grading, road network and stormwater design.

Existing Conditions



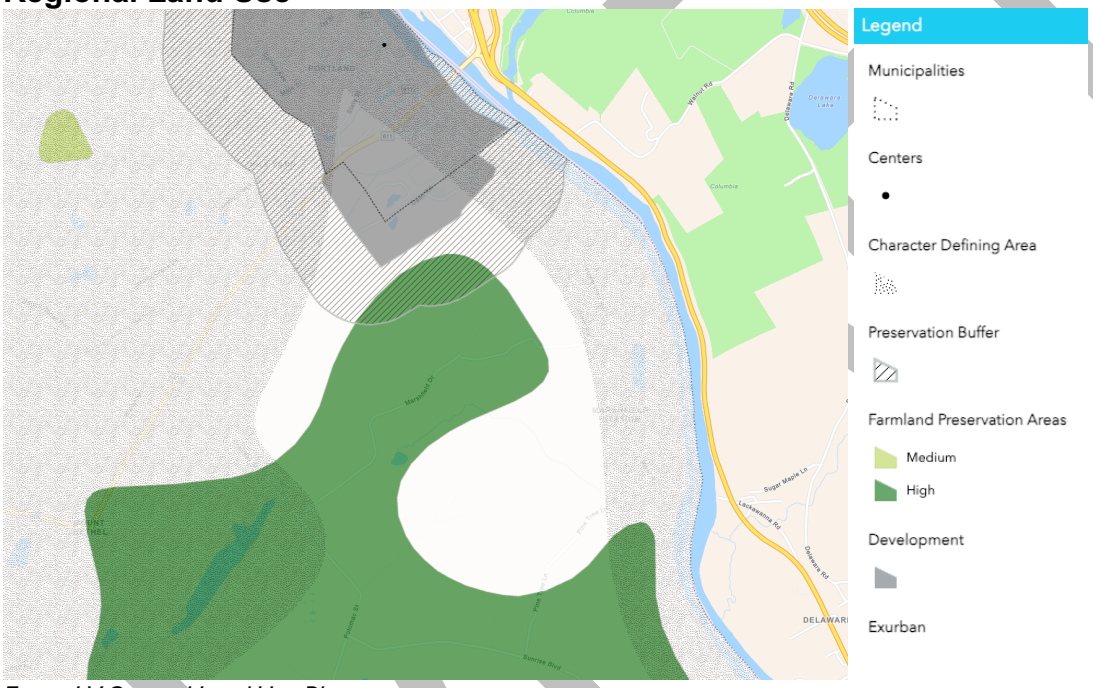
Google Aerial Imagery

The site is located in a rural area south of Portland Borough and west of the Delaware River. Surrounding land uses include existing industrial facilities along River Road, agricultural lands, woodlands, residential properties and the Upper Mount Bethel Community Park. The site's landscape and environmental setting are important regional considerations. The submitted natural resource and existing conditions plans identify

streams, wetlands, steep slopes, areas of dense vegetation and brush, and environmentally sensitive habitat areas.
The area also contains significant scenic and recreational resources. River Road and Route 611 are identified as Scenic Drives in the *FutureLV Parks, Outdoor Recreation, Open Space and Scenic Plan*, and the Delaware River is a federally designated Wild and Scenic River. *FutureLV* also identifies a proposed regional trail connection along River Road, which could connect existing and planned trails in Portland Borough to the north and Lower Mount Bethel Township to the south.

The LVPC recognizes the site's industrial zoning and previous approvals. However, its location, surrounding communities and sensitive natural resources require careful consideration of the proposed development's regional impacts. The LVPC offers the following recommendations to improve consistency with *FutureLV: The Regional Plan*.

Regional Land Use



FutureLV General Land Use Plan

Design 2 proposes six data center buildings and associated infrastructure on the same campus lands on both sides of River Road. The campus area includes lands identified for High Priority Farmland Preservation, Preservation Buffer and Exurban uses on the FutureLV: The Regional Plan General Land Use Plan. Character-Defining Areas are also mapped within the surrounding landscape, including along the Delaware River corridor.

FutureLV prioritizes farmland preservation, natural resource conservation and maintenance of rural character in these areas. Development within Preservation Buffer and Exurban areas should be evaluated against the Plan's development criteria, including infrastructure capacity, proximity to existing development and protection of

high-priority natural resources. The proposed conversion of lands identified for farmland preservation to industrial development does not align with these regional recommendations (Policies 1.1, 1.3, 3.1 and 3.3).

The LVPC recognizes that Design 2 proposes a smaller total building footprint than Design 1 and builds upon prior industrial park approvals. A smaller building footprint may provide opportunities to retain more agricultural land and natural resources, but the extent of those benefits depends on the full disturbance associated with equipment yards, roads, grading and utility infrastructure. The LVPC recommends documenting these impacts and using the reduced building footprint to preserve larger, connected areas of agricultural land, woodlands and open space. Particular attention should be given to protecting the natural and scenic character of the Delaware River corridor and limiting disturbance within mapped preservation areas (Policies 3.1 and 3.2).

Economic Development
The proposal would establish a technology-related industry within the Township's existing planned industrial area. The applicant's reuse of previously developed infrastructure plans and its proposed investment in utilities could support economic activity and coordinated infrastructure development. Employment and tax revenue benefits may also result from construction and operation of the campus (of Policies 1.1 and 4.2).

Development Scale and Electrical Demand
Design 2 substantially reduces the number of data center buildings compared with Design 1, but the applicant continues to identify a maximum electrical demand of 2,100 MW. The smaller building footprint and lower building heights do not, by themselves, demonstrate that electrical infrastructure or operating impacts would be reduced. The LVPC recommends that the applicant explain how the stated electrical demand relates to the six-building configuration, including anticipated demand per building, supporting equipment loads and the proposed sequence of development. The assessment should distinguish contracted electrical service, additional capacity under consideration and electricity that may be generated on-site.

The eastern site plans (CS-211 and CS-212) depict a proposed power plant, electrical equipment and substantial battery storage areas. The eastern zoning information also describes the proposed use as data center development and a power plant. In contrast, the narrative indicates that on-site generation remains subject to future design decisions. The LVPC recommends reconciling these descriptions and identifying which improvements are included in the current land development application.

The applicant should provide a coordinated infrastructure plan identifying the location, size and purpose of each major electrical facility. This should include substations, transformers, standby generators, battery energy storage systems, fuel-related equipment and any generation intended for regular operation. The applicant should also identify applicable approvals and which facilities may constitute separate principal uses

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rather than accessory improvements. The Township should evaluate the relevant zoning classifications with its Solicitor.

The LVPC supports continued coordination with FirstEnergy and the responsible regulatory agencies to document the facilities necessary to serve each phase, their implementation schedule and responsibility for associated costs. This would help align infrastructure planning with development intensity and regional capacity (of Policies 1.1 and 1.4).

Natural Resources
The project narrative references an Environmental Impact Statement and separate stormwater narratives for the eastern and western portions of the campus. These documents should be available to the Township and reviewing agencies to evaluate the cumulative environmental effects of the full development. Particular attention should be given to mapped wetlands, streams, steep slopes, riparian buffers and protected species habitat. The applicant should also document existing and proposed vegetation conditions, identify areas suitable for restoration, and preserve undisturbed natural features wherever feasible.

Continued coordination with PADEP, the Northampton County Conservation District and applicable environmental agencies is recommended to advance conservation of natural resources and reduce potential environmental impacts (of Policies 3.1 and 3.2).

Scenic Character, Building Appearance and Riverfront Compatibility
The Design 2 narrative identifies typical building heights of 35 feet, compared with approximately 80 feet under Design 1. This lower profile could lessen the visual prominence of the data center buildings from surrounding properties and public viewpoints. However, the visual impact of the overall campus will also depend on the size and placement of buildings, grading, electrical installations, outdoor equipment, perimeter fencing and the condition of existing vegetation. Power generation and battery storage facilities on the eastern property are particularly important because of their proximity to the Delaware River corridor.

The LVPC recommends providing building elevations and visual simulations showing how the completed campus would appear from River Road, Route 611, the Upper Mount Bethel Community Park, nearby residential areas and representative viewpoints across the Delaware River. Simulations should include buildings and supporting infrastructure, rather than only the data center structures.

The proposed landscape buffers and berms should be evaluated for their ability to screen equipment and reduce the perceived scale of development. The LVPC encourages preserving existing trees where possible and using native vegetation, building articulation and materials that respond to the site's rural and riverfront setting. The National Park Service, Lower Delaware Wild and Scenic River Management Council and affected neighboring municipalities should be included in appropriate

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scenic-resource coordination. This approach supports development that responds to the region's distinctive landscape and community character (of Policies 3.2 and 5.4).

Regional Trail Connectivity and Employee Accessibility
A conceptual regional trail follows the River Road corridor in the *FutureLV* Parks Recreation and Open Space plan map. This location offers a potential connection between trail facilities in Portland Borough and the broader Slate Belt trail network extending south toward Lower Mount Bethel Township.
The LVPC previously encouraged incorporating trail connections into the River Pointe industrial park. Design 2 should continue to accommodate the long-term opportunity for a connected trail along the site's frontage.

The applicant is encouraged to work with the Township and LVPC to identify an appropriate trail alignment, account for roadway crossings and utility conflicts, and preserve sufficient space for future construction. An easement or other appropriate arrangement should be considered where supported by the applicable municipal requirements and agreements.

Internal pedestrian circulation should provide safe routes between parking areas, building entrances and employee amenities. Bicycle parking and sheltered pedestrian waiting areas would further improve accessibility.

With approximately 600 employees anticipated, the LVPC also encourages discussion with the Lehigh and Northampton Transportation Authority (LANTA) about potential future service. Identifying a suitable location for transit passenger loading, a shelter and an accessible pedestrian connection could reduce barriers to future transportation options (of Policies 2.2, 5.2 and 5.3).

Transportation Analysis and Regional Roadway Conditions
Dynamic Traffic submitted a Trip Generation Comparison memorandum dated October 12, 2026. Rather than preparing a separate Transportation Impact Study (TIS) for Design 2, the memorandum compares the western building program with the western development analyzed in the Design 1 TIS and concludes that the earlier analysis provides a conservative basis for evaluating Design 2.

The LVPC recognizes that fewer data center buildings may generate less routine traffic. However, several assumptions require clarification.

Trip Generation and Study Scope
The trip generation memorandum evaluates five western buildings totaling 1,251,010 square feet. The Master Site Plan (CS-200) also identifies a 228,186-square-foot data center on the eastern property, resulting in approximately 1,479,196 square feet across the six data center buildings. This differs from the narrative's approximately 1.4-million-square-foot total. The LVPC recommends reconciling these figures and updating the transportation documentation to clearly account for the complete Design 2 proposal,

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including the eastern development and any trips associated with power generation, maintenance and supporting facilities.

The LVPC independently evaluated the narrative's 1.4 million square feet using ITE Land Use Code 160 and calculated approximately 775 weekday vehicle trips, including 80 trips during the morning peak hour and 70 during the evening peak hour. However, the proposed development exceeds the square-footage range of the underlying ITE data. The average-rate methodology produces considerably higher estimates than the fitted-curve approach.
The applicant should compare these methods, explain the selected assumptions and demonstrate that anticipated employee shifts, service deliveries and other operating characteristics are reflected in the analysis. The Township and PennDOT should also confirm whether the Design 1 study's traffic assumptions and recommended improvements remain applicable to the full Design 2 configuration.

Roadway Capacity and Rail Bridge Constraints
The existing transportation network has several limitations identified during previous River Pointe reviews, including constrained access to the regional highway system and the Norfolk Southern railroad bridge over Delaware Avenue/Route 1039 north of the development.

The bridge provides approximately 13 feet, 8 inches of vertical clearance. Its limited width and nearby overhead utilities may also constrain movement by large trucks and specialized equipment. These conditions are particularly relevant during construction and installation of electrical transformers, generators and other oversized components. The LVPC strongly encourages the applicant to coordinate with Norfolk Southern, PennDOT, the Pennsylvania Public Utility Commission, Portland Borough and Upper Mount Bethel Township to assess bridge clearances, roadway width, utility conflicts and feasible safety improvements. The proposed southbound right-turn lane at River Road and Demi Road should also be evaluated for feasibility given its proximity to the railroad crossing.

The Design 1 TIS identifies improvements at the Portland-Columbia Bridge approaches, including intersection realignments and coordinated traffic signals. The applicant should clarify whether these improvements remain necessary under Design 2, the status of associated agency approvals and how their construction would be coordinated with the campus's development phases. The transportation assessment should consider the cumulative effects of surrounding industrial uses, not only traffic generated by the subject buildings (of Policies 2.2 and 2.4).

Construction Traffic, Loading and Site Circulation
The project narrative references a construction traffic management plan, but one was not included in the materials provided to LVPC. A construction-specific assessment is recommended because temporary truck movements and delivery of major electrical equipment may have different impacts than routine data center operations.

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The construction plan should estimate vehicle volumes, identify designated routes, staging locations and delivery restrictions, and address potential conflicts with nearby residential areas, roadways and the railroad bridge.

The narrative also identifies 24 loading docks, although their locations are not clearly depicted on the site plans. The LVPC recommends showing the loading facilities and providing adequate truck waiting and staging areas to prevent vehicles from obstructing internal roadways or access drives.
A vehicle-turning analysis should demonstrate safe circulation for delivery trucks, emergency vehicles and refuse collection vehicles, including access around the larger individual buildings proposed under Design 2.

New Marshfield Drive is identified for dedication to the Township. The applicant and Township should document future maintenance responsibilities, including snow removal, pavement maintenance and other long-term roadway obligations.
Electric vehicle charging stations should also be considered in employee parking areas, along with appropriate electrical connections at loading facilities to reduce unnecessary idling (of Policies 2.2 and 3.4).

Water Supply, Sewer Service and Cooling
The project proposes connecting to Portland Borough public water and wastewater systems. The narrative estimates domestic water use and wastewater generation at approximately 17,500 gallons per day. Fire protection would rely in part on on-site storage totaling up to three million gallons.

Design 2 proposes a closed-loop water cooling system that recirculates cooling fluid rather than relying on routine evaporative cooling. The applicant states that the initial cooling system fill would come from an approved off-site source and that cooling fluids would be collected for off-site disposal when necessary. The LVPC recognizes the potential water conservation benefits of this system. The applicant should nonetheless provide a complete water demand assessment distinguishing domestic consumption, the initial cooling-system fill, periodic replenishment, fire storage filling and any process water requirements associated with electrical generation.

Documentation from Portland's water and sewer service providers should identify available capacity, proposed extensions, necessary improvements and the schedule for providing service. The review should also consider how infrastructure construction and service commitments may affect existing users.

Act 58 of 2026, effective December 7, 2026, requires the water-supply evidence specified in MPC §503.1 to be presented before final subdivision and land development approval. The Township should coordinate this requirement with the applicant and applicable service providers.

The LVPC encourages maintaining the proposed water conservation measures while documenting their full operating requirements (of Policies 1.1, 3.1 and 3.2).

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Noise, Air Emissions, Heat and Mechanical Equipment
Even with fewer data center buildings, Design 2 may generate substantial continuous noise and heat from cooling equipment, transformers and other mechanical systems. The proposed electrical generation and battery storage facilities introduce additional operational considerations.

The project narrative anticipates a future acoustical study. The LVPC recommends preparing this assessment using the final equipment configuration, including the cumulative sound from all six buildings and associated electrical facilities. The study should identify existing background conditions and predict sound levels at nearby residences, property boundaries, the Community Park and other sensitive locations. Evaluation should address continuous operations, low-frequency or tonal noise, generator testing and any proposed regular power-generation activities. The applicant should identify the equipment enclosures, acoustic barriers and operating practices needed to meet applicable standards. Post-construction sound measurements are recommended to confirm that operating conditions are consistent with the approved analysis.

Information should also be provided on the amount and location of heat discharged from the cooling and generation systems, including potential impacts on surrounding property, vegetation and equipment. For proposed emission sources, the applicant should identify fuel types, capacity, anticipated operating hours and applicable PADEP permits. These studies would provide a more complete basis for determining the compatibility of the proposed use with nearby land uses and natural resources (of Policies 3.2 and 5.3).

Emergency Access and Operational Safety
Design 2 consolidates data center activity into fewer, larger buildings but continues to rely on an extensive internal road network. Emergency access, equipment isolation and incident response should be evaluated for the entire campus rather than for individual buildings alone.

The plans identify emergency connections to Potomac Street and River Road. The LVPC recommends confirming that these routes provide reliable access for responding fire, police and emergency medical personnel, with suitable turning areas, roadway widths, surface conditions and access controls.

Individual building pads should have adequate access for emergency vehicles from more than one direction where feasible. Particular attention should be given to Building Pad 9 and other locations served by extended internal access drives. A clear system of building numbers, directional signage and emergency access markers should be incorporated into the plans. Appropriate emergency-route signage should also be coordinated along Route 611 and other approaches to the site.

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The applicant should work with local responders and Northampton County emergency management personnel to develop a campus-wide emergency response plan. This should address high-voltage equipment, generators, battery systems, fire-water storage, fuel and chemical inventories, emergency shutdowns, spill response and evacuation procedures.

Emergency responder orientation and training should be completed before facilities begin operation. These measures support coordinated emergency planning and public safety (of Policy 5.1).

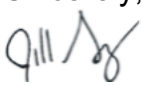
Conclusion
Design 2 presents a different development configuration from Design 1, with fewer buildings and reduced building heights. These changes could provide certain benefits for transportation and visual compatibility. Because both Design 1 and Design 2 have been submitted for the same property, the LVPC urges the Township to maintain clear records of which design and associated infrastructure are being considered for approval. The applicant is encouraged to provide a written response to the LVPC recommendations, identifying proposed revisions, outstanding technical studies and planned mitigation.

The applicant indicates that it intends to communicate with the Township, reviewing agencies and residents during the development process. Continued public access to relevant environmental, transportation and utility information would help residents and municipal officials understand the project's proposed operations and impacts. The LVPC supports this coordination and encourages the applicant to provide clear summaries of technical studies, major design changes and proposed mitigation measures as information becomes available (of Policy 1.4).

Municipalities, when considering land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I §105, Article III §§303, 304 and 306(a), and Article VI §603(j)]. The LVPC review does not include an in-depth examination of the plans relative to municipal subdivision and land development ordinance requirements, which are addressed through the Township's review.

The LVPC has copied appropriate agencies and neighboring municipalities to support coordinated land use decisions across municipal boundaries (of Policy 1.4).

Sincerely,



Jill Seitz, AICP
Director of Regional Planning + Policy

DRAFT

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

November XX, 2026

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

Re: Bethlehem Earth Commerce Data Center – Land Use of Regional Significance
City of Bethlehem
Northampton County

Dear Director Fletcher,

The Lehigh Valley Planning Commission (LVPC) considered the proposed project at the LVPC Comprehensive Planning Committee and Full Commission meetings, pursuant to the Pennsylvania Municipalities Planning Code (MPC). The meetings occurred on:

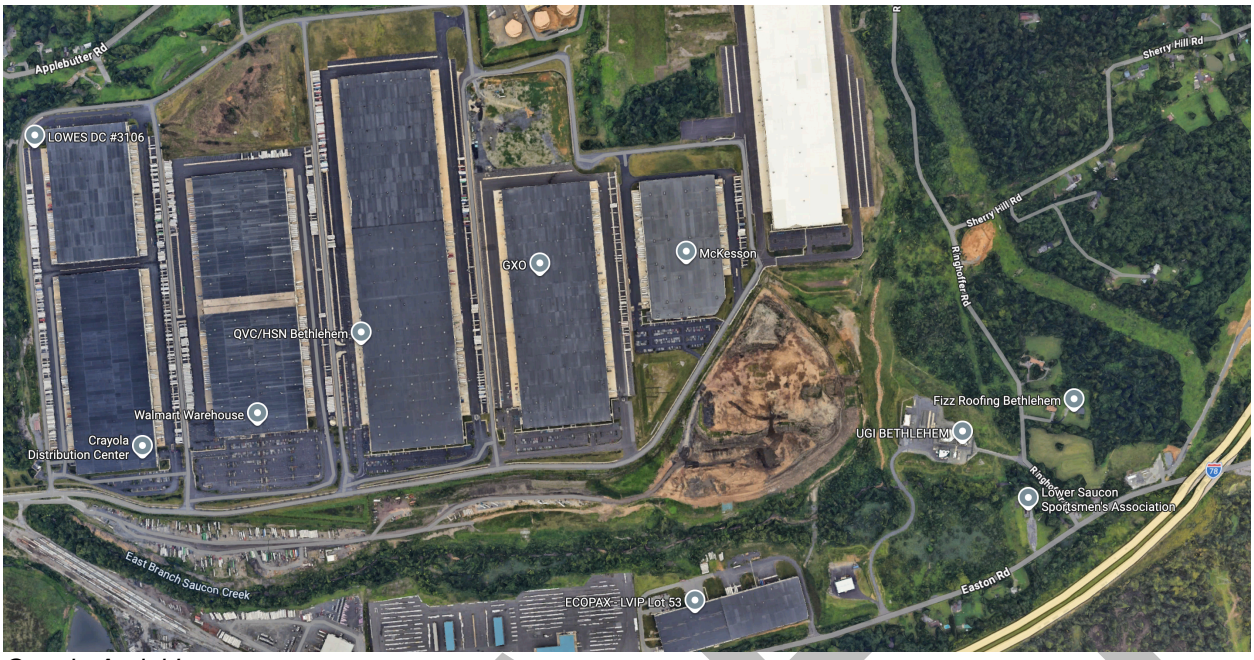
LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
November 17, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	November 19, 2026, at 7:00 PM Virtual https://lvpc.org/lvpc-meetings

Background
Bethlehem Earth LP proposes to construct an 805,000-square-foot, two-story data center at 3700 Commerce Center Boulevard (parcel P7-15-2C). The 68.1-acre property would accommodate an 80-foot tall building with a 402,500-square-foot footprint, generator yards, a 123,750-square-foot electrical substation area, parking, stormwater facilities and associated infrastructure. Access and utility connections are proposed across the adjacent 20.7-acre property at 3200 Commerce Center Boulevard (parcel P7-15-2B).

The site is located within the City's Industrial (IN) zoning district, on land formerly associated with Bethlehem Steel manufacturing operations.

The surrounding Commerce Center area has been developed primarily with large industrial and distribution facilities. The East Branch Saucon Creek runs along the southern edge of the properties, with wetlands, wooded areas and steep slopes located near the creek corridor. The site is also near the City of Bethlehem's boundary with Lower Saucon Township and the UGI Bethlehem LNG facility.

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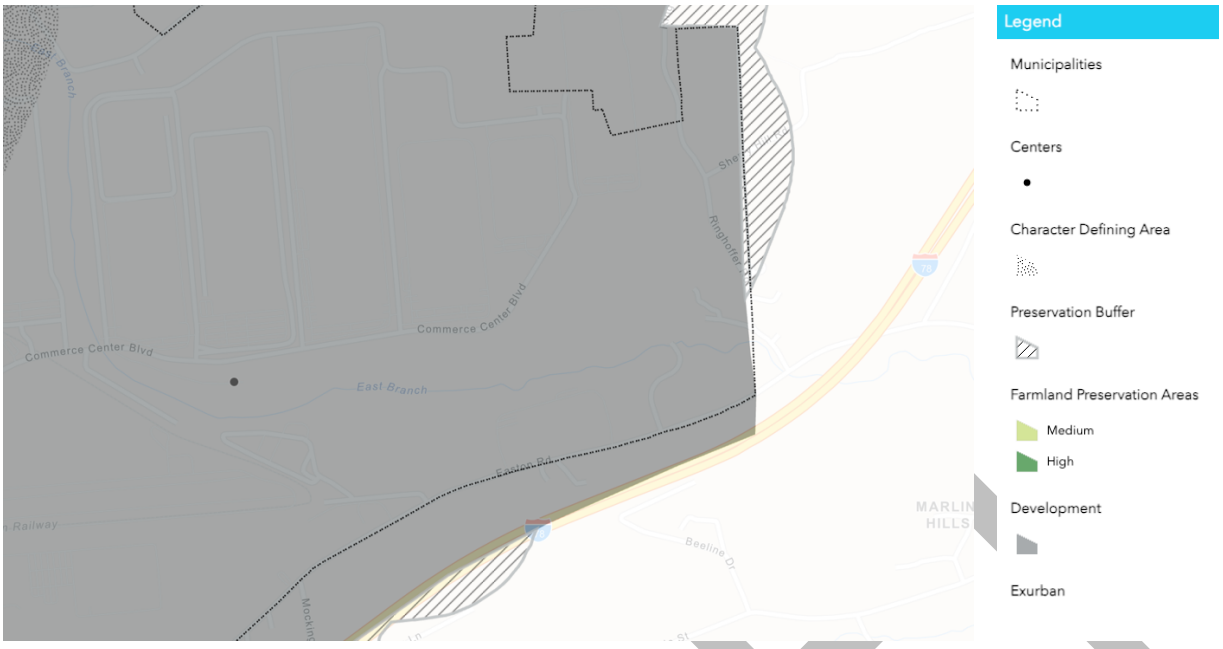
Google Aerial Imagery

The submission is missing essential information about the data center's proposed operations and associated infrastructure needs. The plans identify generator yards, a private electrical substation and water treatment and storage infrastructure, but do not adequately describe their capacity, equipment, operations or potential impacts. These details are essential to evaluating the project's effects on infrastructure, natural resources, public health and neighboring properties.

Regional Land Use and Site Suitability

The properties are identified within a Development area on the *FutureLV* General Land Use Plan. Development areas generally contain existing development and infrastructure and are appropriate locations for continued development and redevelopment. Reusing previously disturbed industrial land supports the Regional Plan's recommendations to encourage the use of vacant and underutilized properties (of Policy 5.4).

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The project would reuse land formerly associated with Bethlehem Steel operations within an established industrial development area. This supports the efficient use of existing infrastructure and redevelopment of underutilized properties (of Policies 1.1 and 5.4). The proposed land use is generally compatible with the surrounding industrial development pattern. However, the intensity and operational characteristics of the facility require further evaluation to demonstrate that the development will use infrastructure responsibly and minimize impacts on nearby properties (of Policies 1.4, 3.1, 3.2 and 5.4).

Electrical Demand and Infrastructure
The plans identify a proposed privately owned electrical substation occupying approximately 123,750 square feet. However, the submission does not identify the data center's projected electrical demand, the substation's capacity or the infrastructure improvements needed to provide service.

The LVPC recommends that the applicant:

- Identify the anticipated electrical demand, including the maximum load at full operation and any planned expansion.
- Provide written coordination with PPL Electric Utilities confirming the proposed service arrangement, available capacity and any necessary transmission, distribution or substation improvements.
- Identify whether off-site utility improvements are needed, who will be responsible for their costs and how service reliability for existing customers will be maintained.
- Provide the anticipated Power Usage Effectiveness (PUE) and describe measures to reduce energy consumption and incorporate renewable energy sources.

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These measures would support responsible infrastructure investment, protect the reliability of existing services and advance regional energy sustainability goals (of Policies 3.4 and 4.6).

Water Supply, Cooling and Wastewater
The project description identifies water treatment and storage infrastructure, and the utility plans depict water and sewer connections. However, the submission does not describe the proposed cooling technology or quantify the facility's anticipated water use and wastewater generation.

Data centers can have substantially different water demands depending on their cooling systems. The LVPC recommends that the applicant identify the type of cooling system proposed, including whether it uses air cooling, evaporative cooling, water cooling or a hybrid system.

The applicant should also provide:

- Projected daily, peak and annual water demand, including cooling, equipment maintenance and domestic uses.
- The proposed source and capacity of water treatment and storage facilities, along with any water reuse or conservation measures.
- The anticipated wastewater volume and discharge characteristics, including any cooling-system discharge.
- Written coordination with Bethlehem Water and Sewer Resources confirming adequate capacity for the facility's projected demands, including periods of drought or peak system demand.

The LVPC also encourages evaluation of water-efficient cooling alternatives and water reuse opportunities to reduce long-term demand on regional water resources (of Policies 3.2 and 3.4).

Noise, Vibration, Air Quality and Heat
The plans identify generator yards along both sides of the proposed building. These areas, together with the electrical substation and cooling equipment, have the potential to generate continuous noise, vibration, heat and air emissions. The application does not provide sufficient information about these systems to evaluate their impacts.

The LVPC recommends that the applicant identify the number, location, capacity and fuel type of all proposed generators, along with fuel storage, emissions controls and anticipated testing and maintenance schedules. The applicant should identify applicable state and federal air quality permitting requirements. A professional noise and vibration impact study should evaluate the facility under full operational conditions, including cooling equipment, transformers, generator testing and other mechanical systems. The evaluation should address audible and low-frequency noise, identify anticipated levels at property boundaries and nearby sensitive properties, and recommend mitigation where necessary.

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The applicant should also provide a thermal impact assessment identifying where waste heat will be discharged and whether the cooling system could affect nearby properties or environmental resources.

The need for noise attenuation, equipment screening, generator testing schedules and other mitigation measures should be evaluated and incorporated into the final site design based on the results of these evaluations. Post-construction testing should also be considered to verify actual operating conditions (of Policies 3.2 and 5.3).

Natural Resources
The East Branch Saucon Creek is a significant natural resource along the southern edge of the development. The plans identify nearby wetlands, watercourse buffers, steep slopes and stormwater management facilities. The LVPC recognizes the proposed buffers and landscaping intended to separate development from the creek corridor. The applicant should confirm that the proposed grading, drainage facilities, utility improvements and equipment areas will not adversely affect the creek, wetlands or associated buffers to protect surface water and groundwater, manage stormwater runoff and minimize the environmental impacts of development (of Policies 3.1 and 3.2).

The proposed landscape improvements offer opportunities to reduce visual impacts, restore vegetation and improve the transition between industrial development and the surrounding natural landscape. These measures support context-sensitive development and environmental stewardship (of Policies 3.2 and 5.4).

Emergency Services and Public Safety
Data centers present specialized emergency response considerations because of their electrical infrastructure, backup power systems, security controls and potential hazardous materials.

The proposed facility includes a long access driveway with staffed security controls and a separate emergency access point closer to the building. The LVPC recommends that the applicant coordinate with the City of Bethlehem's fire, police and emergency medical services to confirm adequate emergency access, equipment clearances, fire suppression, water supply and procedures for entering the secured site.

The applicant should prepare an emergency response plan identifying the proposed electrical and mechanical systems, fuel and chemical storage, equipment isolation procedures, emergency shutdown protocols and any specialized response requirements. Emergency access signage should be installed along Commerce Center Boulevard and other appropriate approaches to direct responders to the correct entrance.

Coordination with surrounding municipalities and nearby industrial facilities, including the UGI Bethlehem LNG facility as appropriate, is also encouraged to support regional emergency preparedness (of Policies 1.4 and 5.1).

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Transportation
The applicant submitted a trip generation evaluation prepared by Kimley-Horn using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, Land Use Code 160, Data Center.

The study estimates 588 weekday daily vehicle trips, including 72 trips during the morning site peak hour and 64 during the afternoon site peak hour. The LVPC reviewed the trip generation calculations and confirmed the projected totals.

These estimates suggest relatively limited operational traffic compared with other industrial uses of similar building size. However, employee shift schedules have not been established, and the study provides limited information about construction traffic, truck deliveries and other service vehicles.

The project's access to an established industrial roadway network, comparatively low projected operational vehicle trips, proposed sidewalks and bicycle parking support efficient transportation and improved access options for employees (of Policies 2.2, 2.3, 5.1 and 5.3).

Freight Operations and Site Access
Access would be provided by an existing driveway from Commerce Center Boulevard, with improvements to accommodate truck turning movements and a proposed westbound left-turn lane.

The submitted plans include truck and fire apparatus turning exhibits. The LVPC recommends supplementing these exhibits with information on anticipated construction and operational truck activity, delivery schedules and the types of vehicles that will regularly serve the facility. Garbage trucks and other service vehicles should be included in the turning analysis where applicable.

The applicant should also evaluate dedicated truck parking or staging areas to prevent vehicles from waiting along access drives when multiple deliveries arrive. The proposed security gate should provide sufficient vehicle queuing space without obstructing internal circulation or emergency access.

A construction transportation plan should identify truck volumes, anticipated routes, construction-related access needs and measures to minimize conflicts with existing Commerce Center operations. Final driveway design, sight distances and proposed roadway improvements should be coordinated with the City and applicable reviewing agencies (of Policies 2.2 and 5.1).

Pedestrian Access and Sustainable Transportation
Sidewalks are proposed along the site access drive, and pedestrian connections are included within the development. These improvements support safer movement

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between parking areas, building entrances and other site facilities (of Policies 5.1 and 5.3).

LANTA Route 105 operates along Hellertown Road (PA 412), and Route 605 serves Commerce Center Boulevard, including a stop near the adjacent McKesson facility. The LVPC encourages the applicant to coordinate with LANTA and the City to ensure that employees have a safe, accessible pedestrian route between the transit stops and the facility.

The plans also identify bicycle parking near the building. The LVPC supports this provision and encourages the installation of electric vehicle charging infrastructure, or accommodations for future charging facilities, within the employee parking areas (of Policies 2.3, 2.5 and 5.3).

Conclusion
The Bethlehem Earth Commerce Data Center is proposed on a previously disturbed industrial property within an area designated for Development in *FutureLV: The Regional Plan*. This location is generally appropriate for industrial redevelopment and offers opportunities to make use of existing infrastructure.

However, the submitted materials do not provide sufficient information for the LVPC to determine the project's overall impact and alignment with *FutureLV* Goals and Policies. The proposed generator yards, electrical substation, water infrastructure and cooling systems are integral parts of the development. Their operational characteristics and associated impacts must be understood to properly evaluate the project.

The LVPC strongly recommends that the City obtain and review the additional information identified in this letter before taking final action on the land development plan, to the extent authorized by applicable ordinances and state law. Where additional studies are not expressly required under the standards governing the application, the LVPC encourages the City and applicant to work collaboratively to provide this information for public and agency review.

If additional information or subsequent design changes substantially modify the submitted plans, the revised materials should be provided to the LVPC for further review before plan signing and recordation.

Municipalities, when considering land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I §105, Article III §§303, 304 and 306(a), and Article VI §603(j)]. The LVPC review does not include an in-depth examination of the plans relative to municipal subdivision and land development ordinance requirements, which are addressed through the Township's review.

The LVPC has copied appropriate agencies and neighboring municipalities to support coordinated land use decisions across municipal boundaries (of Policy 1.4).

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Sincerely,

Jill Seitz, AICP
Director of Regional Planning + Policy

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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

Ms. Donna Asure, Manager
Forks Township
1606 Sullivan Trail
Easton, PA 18040

Re: 605 Kuebler Road – Land Use of Regional Significance
Forks Township
Northampton County

Dear Ms. Asure,

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

LVPC Comprehensive Planning Committee Meeting:	**LVPC Full Commission Meeting:**
November 17, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	November 19, 2026, at 7:00 PM Virtual https://lvpc.org/lvpc-meetings

Background
The application proposes redeveloping a former Dixie cup facility that is currently a brownfield into a 465,500 square-foot warehouse, at 605 Kuebler Road (PIN: J9 15 8 & J9 21 3). The site still contains most of the foundations of the original building, as well as the parking lots and substation. The site also contains a railroad crossing and is directly adjacent to Kesslerville Road.

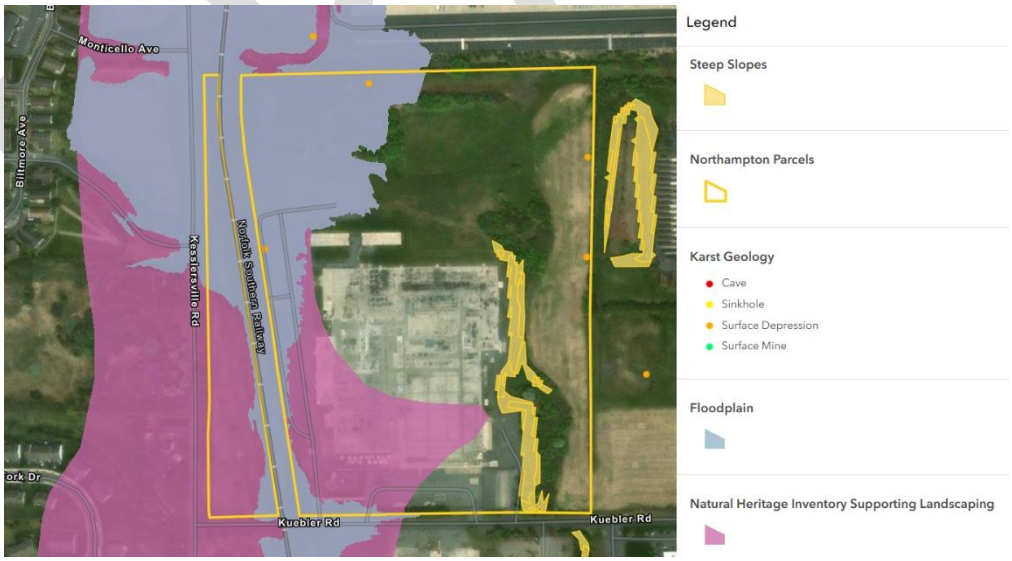


Land Use



FutureLV: The Regional Plan General Land Use Map identifies the site in three different overlapping sections. The project is located within the Development Area, where factors appropriate for development may exist, but also in the Farmland Preservation Area, which is predominantly agriculture and recommended to remain agricultural. The site is also located within the Preservation buffer, areas where the factors may be present but conservation may also be appropriate. *FutureLV* lays out specific development criteria for determining whether an area of the preservation buffer is appropriate for development:

- If 'the proposal is consistent with the conservation of high-priority natural resources' as outlined in the Natural Resources Map in *FutureLV*.



The Natural Resource Map in *FutureLV* highlights several different existing natural resources on the site, including the 1% Annual Chance Flood Hazard, Natural Heritage Inventory Supporting Landscape, which contains environmentally sensitive species or habitats, steep slopes, and several surface depressions from mapping provided by USGS. The proposal does take steps to ‘minimize the environmental impact of

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development’ (of Policy 3.2) by providing flood studies and mitigation to reduce the impact of flood hazard as a part of their conditional approval, expanding basins to contain the extra stormwater created by the steep slopes, and including karst mitigation in the erosion and sedimentation plan. The Natural Heritage Inventory Supporting Landscaping is unlikely to contain the sensitive species because of the existing brownfield, but the LVPC recommends the township consider requesting a Pennsylvania Natural Diversity Inventory (PNDI).

- If 'the site is contiguous to existing development'.

  Most of the site's surroundings to the north, east, and south are industrial like warehousing and manufacturing. To the west of the site are several high-density residential neighborhoods with both condos and single-family homes. Given the site was previously industrial prior to much of the surrounding industrial expansion and the construction of adjacent SR 1009, the site serves as the outer limits of development in the industrial area and is contiguous.

- If 'Adequate sewage conveyance capacity, allocation, and treatment capacity is available at the site'.

  The site will connect to the Easton Area Joint Sewer Authority System and a will-serve letter should be requested prior to final approval of land development.

- If 'the site is identified in the municipal comprehensive plan, zoning ordinance and Act 537 sewage facilities plan for development/public sewage disposal'.

  The site is identified in the Forks Township 2022 Comprehensive Plan as a site for future Industrial Development and is in the Industrial Designation District (ID) which is permitted as a conditional use under the zoning ordinance and was granted permission by the Forks Township Board of Supervisors on June 4, 2026.

- If 'The site will be served by public water with adequate supply and delivery capacity'.

  The site will connect to the Easton Suburban Water Authority to provide public water, and a will-serve letter should be requested prior to final approval of land development.

- If 'The development will not create adverse impacts to the transportation system with respect to roads, bridges, transit facilities and bicycle/pedestrian facilities, including traffic safety or congestion, based on accepted transportation planning and engineering professional standards'.

  The project submitted a Traffic Impact Study (TIS), and a supplemental review as a part of the study. According to the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, ITE Land Use Code 150, Warehouse, based on the 473,000 square foot facility, will generate 71 new AM trips, 80 new PM trips and 653 Total New Trips during Weekdays. The LVPC noted a discrepancy in the square-footage of the land development plans and the traffic impact study, so the LVPC relied on the higher of the two numbers for the ITE estimate to create a more conservative estimate. The original site, a 355,947 square-foot manufacturing facility, is estimated to have generated the same number of truck trips as the proposed use while generating 260

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fewer daily car trips compared to the new proposed use. Therefore, the development will not create adverse impacts exceeding the previous impacts of development

Overall, the site is largely consistent with the development criteria in *FutureLV*, and the township should take steps like ensuring the sewage and water capacity is available, and the environmentally sensitive features will not be impacted by development in order to 'guide location and intensity of development' (of Policy 1.1). The proposal also 'encourages reuse of vacant and underutilized properties' (of Policy 5.4).

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

The LVPC also makes the following recommendations related to the potential impacts of freight on the site to 'strengthen freight mobility to minimize quality of life impacts to residents' (of Policy 2.4):

- The LVPC supports the addition of a truck turning report with fire truck and garbage truck turn radii in the plan.

- The LVPC supports the inclusion of truck parking on the site. However, the trailer parking spaces are only 55'; a connected tractor trailer requires 70 feet of parking to safely park and allows movement of other vehicles around the parked vehicle. It is not clear if the parking spaces are long term or available to address hours of compliance. These "overnight" or long-term parking spaces are a critical safety element for drivers and trucks as well as the community to provide safe and designated parking locations for drivers who may not be allowed to drive. Truck parking is a national problem and freight-centric facilities such as this project can accommodate a limited number of parking spaces to help the truck parking shortage. It is strongly recommended that several parking spaces be provided for tractor-trailers who may require them to rest and reset their hours-of-service timeframes.

- There are no shown snow removal provisions for compliance with the Pennsylvania Snow Removal law requiring snow and ice to be removed from the tops of vehicles so as not to cause road hazards and unsafe conditions. Snow removal equipment to provide compliance with the law for drivers is becoming commonplace for freight-centric facilities.

Additionally, the employee parking lots are an opportunity for the installation of vehicle charging infrastructure to accommodate the emergence of electric vehicles by most automobile manufacturers. It is also recommended that medium and heavy-duty vehicle charging be planned for as the availability of medium and heavy-duty short haul trucks and tractor trailers emerges through industry confidence in purchasing these non-fossil fuel powered vehicles and refrigerated trailers. Environmental noise and pollution mitigation should begin with the ability of the trailer storage areas to connect to electricity for refrigeration units of trailers that are able to have a hybrid run operation of diesel or other fuel and electricity. These efforts would help

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‘reduce transportation-related emissions’, ‘minimize the environmental impact of development’, and ‘reduce climate change impacts through mitigation and adaptation’ (of Policies 2.2, 3.2 & 3.4)

The LVPC commends the proposed sidewalk along the frontage of the site which supports pedestrian safety and reducing fatalities toward zero (of Policies 5.1 and 5.3). The sidewalk should also be expanded within the site to run along the driveways and create a full loop through the site. Where pedestrian paths cross internal truck circulation routes, high-visibility crosswalk markings and signage should be provided to enhance safety for employees walking within the site to further Policies 5.1 and 5.3.

The sidewalks should include the “Truncated Dome Pattern for ADA Detectable Warning Surfaces (ADW). These are an Americans with Disabilities Act (ADA) infrastructure requirement and should be constructed to meet ADA Federal Guidelines and ‘ensure transportation accessibility for all persons’ (of Policy 5.2).

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

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Lehigh Valley Planning Commission

CHRISTINA "TORI" MORGAN
Chair

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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

November 6, 2026

Melissa Mastrogiovanni, Manager
Lower Mount Bethel Township
2004 Hutchinson Avenue
Martins Creek, PA 18063

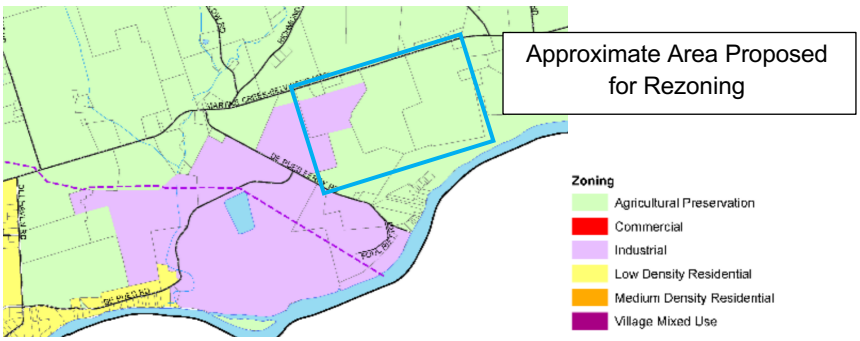
Re: Petition of Martins Creek LLC – Zoning Map Amendment
Lower Mount Bethel Township
Northampton County

Dear Manager Mastrogiovanni,

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:

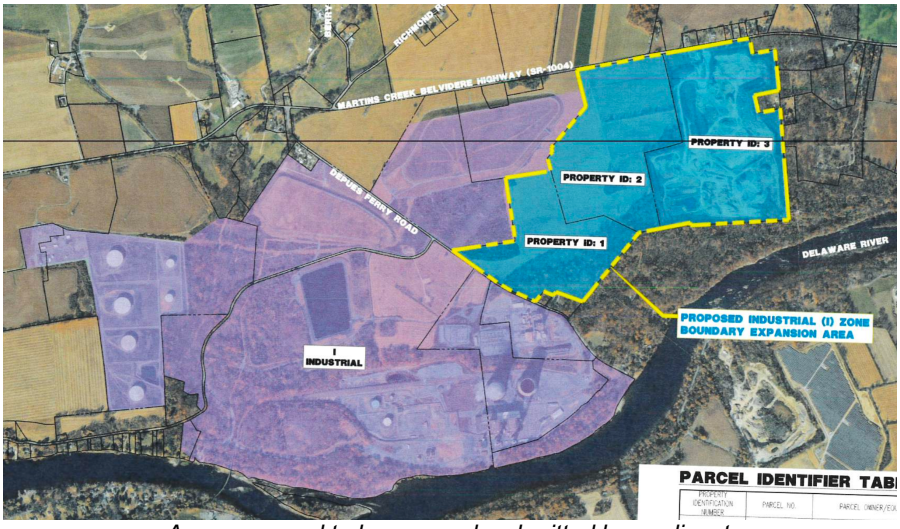
LVPC Comprehensive Planning Committee Meeting:	**LVPC Full Commission Meeting:**
November 17, 2026, at 12:00 PM (Virtual)	November 19, 2026, at 7:00 PM Virtual
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The application proposes to rezone approximately 238.6 acres from the Agricultural Preservation (AP) Zoning District to the Industrial (I) Zoning District. The amendment would expand the existing Industrial District to include 58.1 acres of a currently split-zoned property (Parcel G11-3-3), an approximately 101.9-acre quarry property (Parcel G11-3-7), and an approximately 78.6-acre undeveloped property (Parcel G11-3-6). The area proposed to be rezoned is generally located along Martins Creek-Belvidere Highway, north of DePues Ferry Road, east of Richmond Road and south of Koehler Road.



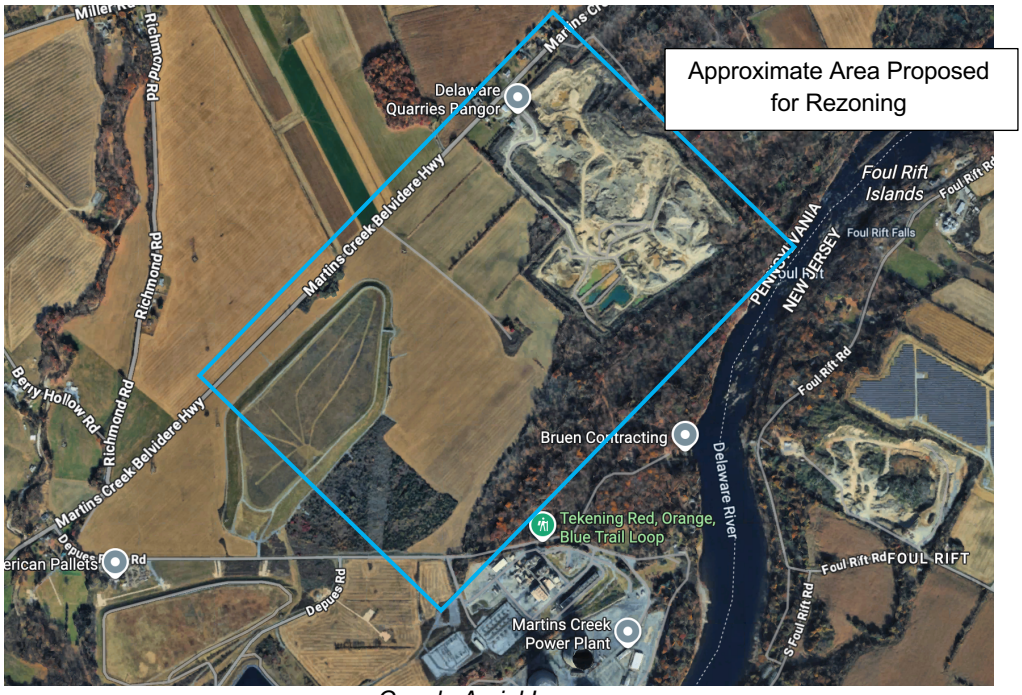
Lower Mount Bethel Township Zoning Map

The properties are located in a predominantly rural area characterized by agricultural fields, woodlands and scattered residential development. Existing industrial uses include a quarry operation to the northeast (included in the proposed rezoning) and the Martins Creek Power Plant to the south (currently zoned Industrial District). The Delaware River lies to the east, with substantial wooded areas along its banks.



Area proposed to be rezoned, submitted by applicant

The LVPC recognizes that a large-scale data center campus has been publicly discussed for this area, although development plans have not yet been provided to the LVPC for review. The Township's recently adopted Ordinance 2026-01 establishes standards for data centers as a conditional use in the Industrial District. Any future development proposal, whether for a data center or another use allowed in the Industrial District, would be subject to applicable zoning, subdivision and land development requirements, and regulatory agency permitting and review.



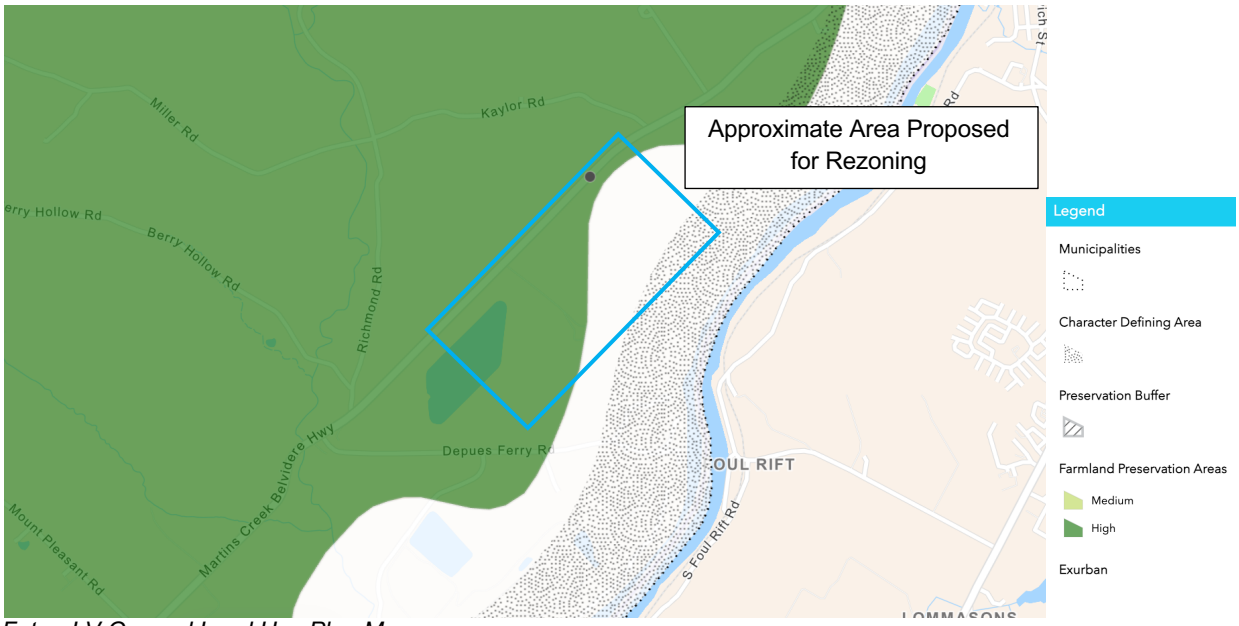
Google Aerial Imagery

The LVPC offers the following comments regarding the proposal's consistency with *FutureLV: The Regional Plan*.

Regional Land Use and Farmland Preservation
FutureLV: The Regional Plan establishes a conservation-first approach to regional land use planning. The Natural Resources Plan specifically states that High Conservation Priority Natural Resource areas 'take precedence over other land use recommendations' (*FutureLV* Plan Maps, page 58). The Farmland Preservation Plan identifies priority agricultural lands for preservation, and the General Land Use Plan recommends farmland preservation within designated Farmland Preservation areas.

The proposed rezoning area is located primarily within an area identified as High Farmland Preservation Priority on the *FutureLV* General Land Use Plan and Farmland Preservation Plan. The properties are also near the Delaware River corridor, which is identified as a Character-Defining Area. Expanding industrial zoning into these areas does not align with *FutureLV's* recommendations to preserve agricultural lands, protect natural resources and maintain the region's rural character (of Policies 1.1, 1.3, 3.1 and 3.3).

However, the properties include an existing quarry and are adjacent to established industrial operations. The LVPC recognizes that previously disturbed industrial land presents different preservation considerations than undeveloped agricultural or wooded properties. The LVPC recommends prioritizing the retention of agricultural and undeveloped portions of the properties, particularly where productive agricultural soils and significant natural resources are present.



FutureLV General Land Use Plan Map

Industrial Land Use
The proposed rezoning would expand the existing Industrial District adjacent to quarry and power generation operations. Concentrating compatible industrial development near established industrial uses, rather than introducing it into new locations, aligns with *FutureLV* by supporting a more coordinated development pattern and efficient use of infrastructure (of Policies 1.1 and 4.2).

The Township's Comprehensive Plan (2022) acknowledges this opportunity. Chapter 6, page 6-4 supports limited industrial expansion adjoining existing quarry and power generation facilities, while also emphasizing the need for buffers and protection of surrounding land uses.

Additionally, the Pennsylvania Municipalities Planning Code (MPC) requires municipalities to accommodate reasonable community growth and opportunities for nonresidential development while also preserving prime agricultural land (§604(3) and (5)). The relevance of surrounding industrial uses was also recognized in *Carnahan v. Slippery Rock Township Zoning Hearing Board*, No. 1082 C.D. 2022 (Pa. Cmwlth. Nov. 8, 2023), in which the Commonwealth Court upheld a rezoning from Rural Conservation to Light Industrial based in part on surrounding industrial operations. The decision supports considering existing land use patterns when evaluating zoning changes.

These considerations provide a reasonable planning basis for considering additional Industrial zoning in this location by 'matching development intensity to sustainable infrastructure capacity' (of Policy 1.1) and by considering the specific context of an area when making development decisions (of Policy 5.4).

Economic Development
The proposed expansion could provide opportunities for economic diversification and growth in emerging industries (of Policy 4.2), while making use of an established industrial area. However, agriculture is also an important component of the regional economy (of Policy 4.4), and the conversion of productive farmland should be weighed against these potential benefits.

Additional industrial development could also strengthen the Township's tax base, but may introduce long-term costs for infrastructure, public services and emergency response. The LVPC encourages the Township to consider both the economic benefits and public costs of the potential development when determining an appropriate extent of industrial expansion (of Policy 4.6).

Natural Resources and Scenic Character
The proposed rezoning area is near the Delaware River and its associated woodlands and natural resources. The properties also front Martins Creek-Belvidere Highway, which is part of the Delaware River Valley Scenic Byway.

The LVPC recommends retaining appropriate agricultural or natural buffers along the Scenic Byway and Delaware River corridor and evaluating whether the proposed zoning boundaries and existing development standards adequately protect woodlands, waterways, floodplains and other sensitive resources. These measures would help conserve regional environmental and scenic assets and minimize potential impacts from industrial development (of Policies 1.3, 3.1 and 3.2).

Infrastructure Capacity and Regional Impacts
The petition identifies proximity to existing power generation facilities as a reason for the proposed rezoning. The location presents opportunities to leverage existing electrical infrastructure to support emerging industries and technology, supporting *FutureLV's* emphasis on expanding technology, communications and utilities to prepare for future employment opportunities (of Policy 2.5). However, proximity to existing infrastructure does not necessarily establish that adequate capacity is available to support additional development.

The LVPC recommends establishing a preliminary understanding of the infrastructure capacity and potential development intensity that the expanded Industrial District could accommodate before adopting the amendment. This should include available water and wastewater service, electrical capacity, emergency service needs, and the ability of Martins Creek-Belvidere Highway, DePues Ferry Road and connecting roads to accommodate additional industrial traffic.

Identifying these considerations at the zoning stage would help the Township determine an appropriate extent of industrial expansion, while allowing detailed impact studies and permitting to occur during subsequent development reviews (of Policies 1.1, 1.4, 2.5 and 3.2).

Regional Takeaways
The proposed zoning map amendment presents an opportunity to accommodate industrial growth adjacent to established quarry and power generation operations, potentially making more efficient use of existing infrastructure and supporting economic development. However, it would also expand industrial zoning into an undeveloped area identified for farmland preservation in *FutureLV*, near natural and scenic resources of regional importance.

From a regional planning perspective, the LVPC supports consideration of limited industrial expansion in this location, but the extent of expansion should be informed by the agricultural, environmental and infrastructure characteristics of the affected properties. The LVPC recommends that the Township and applicant further evaluate and refine the proposed zoning boundaries to prioritize areas most suitable for industrial development, and more importantly, retain existing agricultural and natural lands and protect the Delaware River Valley Scenic Byway. Ensuring that the boundaries of Industrial District are expanded intentionally would reconcile economic development opportunities with *FutureLV's* regional preservation and growth management priorities.

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,



Jill Seitz, AICP
Director of Regional Planning + Policy

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

November 6, 2026

Craig Beavers, Director of Community Development
Palmer Township
3 Weller Place
Palmer, PA 18045

Re: Palmer Township Subdivision and Land Development Ordinance Update
Palmer Township
Northampton County

Dear Mr. Beavers,

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:

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The application proposes amending the Township's Subdivision and Land Development Ordinance, which was last updated in 1994, to update the structure and usability of the ordinance, better align with other municipal and county plans, make improvements to streets and active transportation, improve recreation area and environmental provisions, and requires studies that inform the decision making while adding steps to expedite reviews and transparency. 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).

The ordinance addresses structure and usability by reorganizing the document and renumbering provisions to separate sections within an article, making the ordinance easier to review and utilize which supports 'an efficient development process responsive to regional needs' (of Policy 1.4). The proposed amendment takes it a step further by eliminating duplicate stormwater standards and switching to electronic submissions of plans, which also aligns with Policy 1.1 by 'integrating efficiency measures and emerging technologies'

The amendment also adds a section requiring conformance with numerous plans that help guide Palmer Township and Northampton County, including its comprehensive plan which leaves room for future multi-municipal comprehensive plans, Palmer Township Parks,

Recreation, and Open Space, Complete Streets, Public Service Improvement Plans and Regional Plans, including *FutureLV* and *Walk/RollLV: Active Transportation Plan.* The amendment also paves the way for other Township plans that are more specialized, like the Palmer Township Climate Action Plan, Bushkill Greenways, Northern Tier Traffic Study and more. Conformance with municipal and county plans ensures that the goals of these plans are met and aligns with Policy 1.4 to 'encourage an efficient development process that is responsive to regional needs', by taking the needs and goals outlined in each of those plans and tying them back to development.

The proposed amendment also addresses street and active transportation improvements in development. Strong provisions include bicycle parking requirements, increased bicycle amenity standards, universal sidewalk requirements, and improved crosswalk and public transit regulations and standards. These changes achieve many of the Policies outlined in Goal 2 of *FutureLV: The Regional Plan* to create a 'connected mixed-transportation region'. Supporting bicycling and bus station design helps 'develop a mixed-transportation network to support a more compact development pattern, optimize roadway capacity and encourage alternative travel options' (of Policy 2.1), while the safety improvements 'enhance incident management strategies' (of Policy 2.2), and universal sidewalks will make connection across different areas easier and 'improve connection between mass transit and walk/roll infrastructure' (of Policy 2.3)

The proposed amendment also addresses both the recreation areas and environmental standards in the ordinance. The proposal changes how recreation areas are calculated, following the best practices of the National Recreation and Parks Association, to better align with the Townships Parks & Open Space Plan. The fee-in-lieu of construction of recreation areas is clearer and gives the Township additional discretion when the open space requirement does fit well with a development. These changes will help 'create community spaces that promote physical and mental health' by 'improving access to green spaces' (of Policy 5.3).

Environmental changes include strengthened green stormwater infrastructure use and more specific and standardized tree preservation rules which will 'minimize the environmental impact of development' by 'managing the rate, volume and quality of storm runoff' and 'conserve and manage natural lands and water resources for environmental and recreational benefits' by ' preserving natural resources in the land development process' (of Policy 3.1 & 3.2).

Finally, the ordinance amendments change some of the operational structures of the land development process that are beneficial. Required public notice helps 'facilitate discussion among residents, stakeholders, appointed officials and elected representatives', and administratively approving minor plans dramatically reduces the time it takes for approval of projects with low impact, which 'encourages an efficient development process that is responsive to regional needs' (of Policy 1.4). The additional study requirements such as environment site assessments, threatened or endangered species studies, impact analysis for major plans all further Policy 1.4 by 'minimizing impacts of land uses of regional significance' and 'educate municipalities on the long-term impacts of subdivision, development, zoning and planning' (of Policy 4.6).

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

Lehigh Valley Planning Commission

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November XX, 2026

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

Re: Healthcare Adaptive Reuse Petition
City of Bethlehem
Northampton County

Dear Ms.Fletcher,

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

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The application proposes a zoning ordinance amendment in the City of Bethlehem to create "healthcare adaptive reuse" as a permitted use in the Single-Family Residential District (RS) and add several provisions under additional requirements for certain uses.

Under the declared purposes of each district, the Single-Family Residential District (RS) is intended to "provide medium density neighborhoods that are primarily comprised of single-family detached dwellings" (page 24 of the City of Bethlehem Zoning Ordinance). The intent of this district does not align with the proposed use of healthcare buildings. This mismatch is also reflected in the permitted use chart, which does not allow Personal Care Homes or Assisted Living Facilities within the RS zone, despite the proposal's restriction to allow adaptive reuse only at existing lawful uses.

The Pennsylvania Municipalities Planning Code (MPC) defines a nonconforming use as one that "does not comply with the applicable use provisions in a zoning ordinance… where such use was lawfully in existence prior to the enactment of such ordinance or amendment" (Municipalities Planning Code, page 5). Because Personal Care Homes or Assisted Living Facilities within the RS zone that would undergo healthcare adaptive reuse currently qualify as nonconforming uses, creating a "healthcare adaptive reuse" classification would effectively change a nonconforming use into a conforming use without substantially changing the facility.

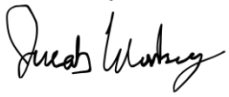
Consequently, this bypasses the City's regulations governing changes in the impact of nonconforming uses. Section 605(1) of the MPC explicitly empowers municipalities to regulate nonconforming uses and structures (page 47 of the Municipalities Planning Code). The implementation of this ordinance would allow an existing nonconforming use to become conforming without needing to meet the standard requirements of the newly permitted use under the adaptive reuse framework.

Additionally, the proposal does not define what "healthcare adaptive reuse" actually means, making it difficult to evaluate its potential impact. The City's ordinance defines several distinct uses that fall under the broader umbrella of healthcare, such as Medical Office Buildings, Hospitals, and Treatment Centers. Each of these uses carries different community and traffic impacts; therefore, any change in use for an existing Assisted Living Facility or Personal Care Home within the RS Zone should be evaluated against the specific impact of the newly proposed use. This comparative approach would better align with *FutureLV: The Regional Plan* by "guiding the location and intensity of development" (of Policy 1.1).

While *FutureLV: The Regional Plan* generally does "encourage reuse and redevelopment in urban areas" (of Policy 1.1), the adaptive reuse of Assisted Living Facilities or Personal Care Homes into uses more aligned with the district's intent, such as housing or schools, would better fulfill the goals of *FutureLV*.

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