



Lehigh Valley Planning Commission

DR. CHRISTOPHER R. AMATO  
Chair

CHRISTINA V. MORGAN  
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

**COMPREHENSIVE PLANNING COMMITTEE MEETING**  
**Tuesday, May 20, 2025, 12:00 noon**  
**AGENDA**

**THE MEETING CAN BE ACCESSED AT <http://www.tinyurl.com/LVPC2025> OR VIA PHONE 610-477-5793 Conf ID: 651 626 091#.**

**Roll Call**

**Courtesy of the Floor**

**Committee Business**

1. *ACTION ITEM*: City of Allentown – Land Use of Regional Significance – 249 N. Front Street Mixed Use (JS)
2. *ACTION ITEM*: Upper Mount Bethel Township – Zoning Ordinance Amendment – Data Centers (JS)
3. *ACTION ITEM*: Upper Nazareth Township – Zoning Ordinance Amendment – Apartment Density in the Village Mixed Use (TD-6) District (JD)
4. *ACTION ITEM*: City of Allentown – Zoning Map Amendment – Cedar Crest College (JD)
5. *INFORMATION ITEM*: Housing Supply and Attainability Strategy Event (JS/JD)
  - a. DeSales University Center, June 23, 2025, from 8:00-11:00 AM
  - b. Register Here: <https://lvpc.org/housing>
6. *INFORMATION ITEM*: Electronic Plan Submission Update (JS/JD)

**Next Comprehensive Planning Committee Meeting:**  
June 24, 2025, at 12:00 pm



DR. CHRISTOPHER R. AMATO  
Chair

CHRISTINA V. MORGAN  
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

May 13, 2025

Ms. Jennifer Gomez, Director of Planning and Zoning  
City of Allentown  
435 Hamilton St.  
Allentown, PA 18101

**Re: 249 North Front Street – Land Development  
City of Allentown  
Lehigh County**

Dear Ms. Gomez:

The application is considered a Land Use of Regional Significance under the Mixed-Use Developments category in *FutureLV: The Regional Plan* (page 147). The Lehigh Valley Planning Commission (LVPC) will consider proposal at the Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on agenda items largely happens during the Committee meeting, and we encourage any and all 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
  - May 20, 2025, at 12:00 PM
  - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
  - May 20, 2025, at 7:00 PM
  - <https://lvpc.org/meetings.html>

The application proposes to redevelop the site by demolishing the existing buildings and constructing a mixed-use development including 267 apartment units, 21,351-square-feet of office space and 23,684-square-feet of retail/commercial space. The project is located at 249 North Front Street (parcel number 640743875938).

### Background

The project site contains an existing building that was formerly a furniture manufacture and is currently vacant. The site is in an area with existing urban development and within the Development area identified in *FutureLV: The Regional Plan*. Areas designated for Development have infrastructure to accommodate future growth and redevelopment.

The proposal is in close proximity to the Lehigh River, the expanding Waterfront redevelopment project and several other redevelopments. The site's reuse aligns with *FutureLV: The Regional Plan* by encouraging reuse and redevelopment within urban areas (of Policy 1.1), supporting

infill and brownfield redevelopment to enhance the economic vitality of communities (of Policy 4.6) and increasing density of residential and mixed-use development in centers (of Policy 1.2).

The replacement of underutilized or aging structures with a high-density, mixed-use project supports regional sustainability goals and leverages existing infrastructure, helping to preserve farmland and natural resources elsewhere in the region.

### **Land Use**

The integration of office and retail space in the proposal provides potential for job creation and economic revitalization in a traditionally industrial corridor, which promotes a regionally competitive economic environment that creates jobs (of Policy 4.3) and encourages business development and entrepreneurship through mixed-use and walkable communities (of Policy 4.5). The addition of office and retail uses within a residential development also promotes daytime activity, neighborhood vibrancy, and economic diversity (of Policy 5.1).

The residential component of the project supports meeting the City's housing needs, where today the City has nearly a 2,000 unit housing shortage and should add an additional 4,000 units by the year 2050 based on current population growth trends, according to the [Lehigh Valley Housing Supply and Attainability Strategy](#). The LVPC strongly encourages the applicant to diversify the price points and types of units offered in the proposed project to maximize attainable housing opportunities and promote mixed-income neighborhoods (of Policy 4.5). In the Lehigh Valley, the average retail salesperson can reasonably afford housing costs up to \$881 per month, and the average entry-level professional in the region can afford up to \$771 per month ([2025 Lehigh Valley Housing Dashboard](#)). Considering that the project includes a mix of uses, including retail, providing housing that is suitable for the workforce is essential to the long-term viability of the project and future businesses that will locate there.

### **Transportation**

The site's urban location is well-connected to major roadways, public transportation, pedestrian and bicycle infrastructure, offering multimodal accessibility. The proposal supports 'encouraging development in centers with existing infrastructure, including transit and walkability' (of Policy 5.1).

The Lehigh and Northampton Transportation Authority (LANTA) provides fixed-route public transportation near the project site, with a bus route currently serving on North Front Street (north of Gordon Street) less than 200 feet from the project site. Given the redevelopment growth occurring in the Waterfront vicinity, future service along the property frontage portion of North Front Street is anticipated. The LVPC strongly recommends the applicant coordinate with LANTA on the design of bus stop-supportive infrastructure near the North Front Street and Chew Street intersection. This would include a five-foot concrete pad in between the curb and the sidewalk, at least 40 feet past the driveway entrance. Transit-supportive infrastructure should be planned and constructed at the time of land development to maximize available financial resources (of Policy 2.6). The LVPC recommends continued engagement with LANTA Planner/Land Use Specialist Molly Wood at [mwood@lantabus-pa.gov](mailto:mwood@lantabus-pa.gov) to coordinate the recommended bus stop details and timing of construction to align with future service.

The proposed bicycle room inside the building serves to 'improve connections between bus stops and pedestrian and bicycle infrastructure' (of Policy 5.2). The LVPC recommends ensuring that bicycle storage is available to on-site workers in addition to residents. Bicycle

racks could be included near the building entrance to support transportation accessibility for all persons (of Policy 5.2).

### **Environment**

As a redevelopment project near the Lehigh River, environmental considerations are critical. The proposal includes a green roof, which 'minimizes environmental impacts of land development' (of Policy 3.2). The proposed landscaping also helps 'create community spaces that promote physical and mental health' (of Policy 5.3). The LVPC encourages the applicant to consider incorporating sustainable building practices such as greywater reuse, which can increase the cost-effectiveness of building operations while supporting the health and wellbeing of the community (of Policy 3.4).

Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Please feel free to reach out if there are any questions about this review.

Sincerely,



Jillian Seitz  
Chief Community Planner

cc: Lehigh River Development Corporation II, LLC, Applicant; Minal Amin, Project Engineer; David Petrik, City of Allentown Deputy Director of Public Works; Jesse Sadiua, City of Allentown Chief Planner; Brandon Jones, City of Allentown Planner; Lillian Bernstein, City of Allentown Planner; Melissa Velez, City of Allentown Planner.



DR. CHRISTOPHER R. AMATO  
Chair

CHRISTINA V. MORGAN  
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

May 9, 2025

Mr. Matthew J. McHugh, Special Counsel  
Upper Mount Bethel Township  
387 Ye Olde Highway  
PO Box 520  
Mount Bethel, PA 18343

**Re: Zoning Ordinance Amendment – Data Center Regulations  
Upper Mount Bethel Township  
Northampton County**

Dear Mr. McHugh:

The Lehigh Valley Planning Commission (LVPC) will consider the proposed ordinance amendment at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Discussion on items largely happens during the Committee meeting, and community participation is welcome and encouraged. The LVPC will send a follow-up letter if the Commissioners have any additional comments. The meetings are being held on:

- LVPC Comprehensive Planning Committee Meeting
  - May 20, 2025, at 12:00 PM
  - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
  - May 22, 2025, at 7:00 PM
  - <https://lvpc.org/lvpc-meetings>

The proposal amends the Township Zoning Ordinance by adding definitions and regulations for Data Center land uses. Data Centers have been expanding across Pennsylvania and are an emerging land use in the Lehigh Valley, and when sited appropriately, support the region's technological evolution, economic base and overall sustainability (of Policy 4.1). The LVPC is supportive of the Township in proactively regulating data center land uses. Aspects of the Township's proposed ordinance align with *FutureLV: The Regional Plan*, and the LVPC offers additional recommendations to improve upon the proposal to support public health, safety and welfare.

**Where the Ordinance Aligns with Best Practices**

The amendment adds definitions for *Data Center*, *Data Center Campus*, *Accessory Uses*, and *Master Plan* and adds data centers and campuses as a use permitted by-right in the Planned Industrial Park (I-2) Zoning District. Aspects of the proposed ordinance align with best practices in regulating data centers, including:

- **Clear Definitions:** The ordinance distinguishes between centers, campuses, and accessory equipment, which supports minimizing impacts of regionally significant land uses (of Policy 1.4);
- **Noise Performance Standards:** The ordinance adopts decibel-based thresholds with quantifiable and enforceable noise limits and acknowledges daytime/nighttime sensitivity, which protects the public health and safety (of Policy 5.3);
- **Phased/Campus Development:** Data centers often cluster in large campus developments, and the included provisions for phased development provide flexibility for large campuses with long-term horizons and supports quality sustainable design and construction (of Policy 1.2); and
- **Underground Utilities Where Feasible:** Encouraging underground utility lines is a visual and safety best practice and maximizes existing infrastructure use (of Policies 1.1 and 4.6).

### **Where the Ordinance Deviates from Best Practices + Opportunities for Improvement**

Aspects of the proposed ordinance can be improved to better align with industry needs and the context of the area, including:

- **Height Limitations:** The proposal permits Data Center buildings up to 110 feet high. While some Data Centers across the country have been proposed at these heights, they are also located within urban areas with minimal land available. The LVPC strongly recommends substantially reducing the height limit in consideration of the context of the I-2 Zoning District area, which includes scenic drives along Route 611 and River Road, the Delaware River, a federally designated Wild and Scenic River, and the Township's Community Park adjacent to the I-2 Zoning District. Reducing the height maximum to average Data Center size would better 'promote development that complements the unique history, environment, culture and needs of the Valley' (Policy 5.4).
- **Parking Minimums:** The proposal requires a minimum of 40 parking spaces per Data Center, which can be an aggregated minimum in a Data Center Campus. Data centers have very few employees, and 40 parking spaces per data center exceeds what's typical (other facilities note 5–20 staff per site). This may lead to overbuilt, unused impervious surfaces and stormwater impacts. The LVPC recommends changing this requirement to a contextual standard, such as 1 space per on-site employee, to reduce impervious surfaces to protect water sources (of Policy 3.3).
- **Design and Aesthetic Standards:** While fences and lighting are addressed, the proposed ordinance does not mention aesthetic standards that reduce the visual impact of large buildings. The LVPC recommends adding requirements for landscaping or natural screening, façade breaks or faux windows especially adjacent to public roads, and setbacks with screening for mechanical equipment or generators to maintain regional character and community livability (of Policies 1.3 and 5.4).
- **Guidance on Water Use:** Data Centers require substantial cooling systems to operate and often consume large amounts of water, which is not addressed in the proposal. The LVPC recommends adding requirements for use of non-potable/recycled water in building operations where feasible, as well as disclosure of cooling type and projected water usage, and coordination with water provider to protect critical resources (of Policy 3.1).
- **Grid Impact Assessments:** The LVPC recommends the Township require applicants to provide an interconnection agreement from an electric service provider indicating that capacity is available and the Data Center will be served to 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).

- **Sustainability:** The LVPC encourages the Township to add optional or incentive-based provisions for on-site solar readiness, geothermal energy systems and energy storage or microgrid integration to promote renewable energy sources and sustainability (of Policy 3.4).

Data Centers are an emerging land use in the Lehigh Valley, and Upper Mount Bethel Township is to be commended as the first community to bring forward an ordinance regulating these land uses. Because Data Centers have already been prominent land uses in other areas of the country as essential to supporting our digital infrastructure, many best practices have been established to minimize community impacts and maximize sustainability of these developments. Upper Mount Bethel Township has an opportunity to be a regional leader in regulatory best practices as other communities look to update their ordinances ahead of increasing market interest in locating data centers in the Lehigh Valley. The best practices outlined in this review are provided by the Urban Land Institute's *Local Guidelines for Data Center Development* whitepaper. The LVPC is available as a resource if the Township would like to further discuss best practices in regulating emerging land uses.

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

Please feel free to reach out if there are any questions about this review.

Sincerely,



Jill Seitz  
Chief Community and Regional Planner

cc: Nick Graziano, Township Manager; Cindy Beck, Township Secretary



DR. CHRISTOPHER R. AMATO  
Chair

CHRISTINA V. MORGAN  
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

May xx, 2025

Lisa Klem, Manager  
Upper Nazareth Township  
1001 Newport Ave  
Nazareth, PA 18064

**Re: Apartment Density in the Mixed Use (TD-6) District – Zoning Ordinance  
Amendment  
Upper Nazareth Township  
Northampton County**

Dear Ms. Klem:

The Lehigh Valley Planning Commission (LVPC) will consider the subject application at its Comprehensive Planning Committee and Full Commission meetings, per requirements of the Pennsylvania Municipalities Planning Code (MPC). The meetings are on:

- LVPC Comprehensive Planning Committee Meeting
  - May 20, 2025, at 12:00 PM
  - <https://lvpc.org/meetings.html>
- LVPC Full Commission Meeting
  - May 22, 2025, at 7:00 PM
  - <https://lvpc.org/meetings.html>

The application proposes revisions to the apartment density permitted in the Village Mixed Use District (TD-6) by clarifying apartments as a by-right use. Apartments will be limited to four dwelling units and need a principal commercial use that is at street level. Lot dimension standards for attached residential uses and a table of off-street parking requirements are also proposed (Table 6.1).

The parking requirement table was mistakenly omitted from the Township's recent update and revising to include it is a best practice for local governments and aligns with *FutureLV: The Regional Plan* (of Policy 1.4). The proposed zoning ordinance revisions promote clarity and make the document more accessible for members of the public.

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 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Dotta". The signature is fluid and cursive, with the first name "Joseph" and last name "Dotta" clearly distinguishable.

Joseph Dotta  
Regional Planner

cc: Mary Grace Collins, LVPC Community Fellow.

May xx, 2025

Ms. Jennifer Gomez, Director of Planning and Zoning  
City of Allentown  
435 Hamilton St.  
Allentown, PA 18101

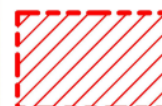
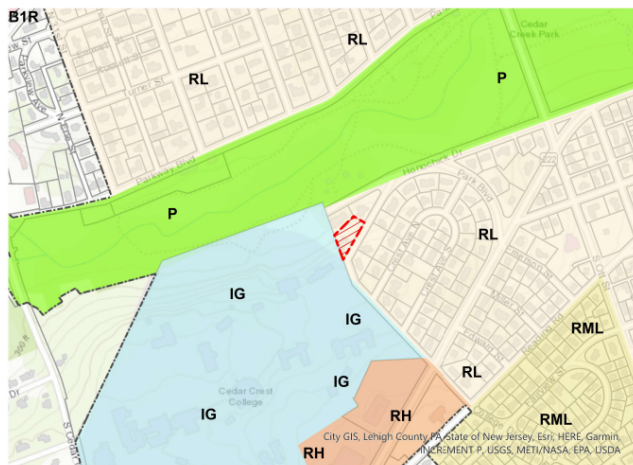
**Re: Cedar Crest College – Zoning Map Amendment  
City of Allentown  
Lehigh County**

Dear Ms. Gomez:

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

- LVPC Comprehensive Planning Committee Meeting
  - May 20, 2025, at 12:00 PM
- LVPC Full Commission Meeting
  - May 22, 2025, at 7:00 PM

The application proposes to amend the City of Allentown Zoning Map to rezone one lot located at 2851-2865 College Drive (parcel number 548685625829) from Low-Density Residential (R-L) to Institutional and Governmental (I-G) at 2851-2865 College Drive. Cedar Crest College recently acquired the property, and according to materials submitted with the application, intends to rehabilitate the existing building for use as a technology/academic center while retaining the external residential character. The space will be used by college staff and for seminars. No students are expected to be living in this property, and the building will be open regular business hours during the day. 'College or University' is not a permitted land use within the R-L Zoning District.



= Proposed Parcel to Change to IG.

The existing property is directly adjacent to the Cedar Crest College campus. The proposal is an extension of the existing I-G District and generally aligns with *FutureLV: The Regional Plan* would 'expand access to education and job training' (of Policy 4.1) and 'promote economic and educational opportunities' (of Policy 4.3).

However, the I-G District permits a range of community-supportive land uses and residential land uses, and the LVPC notes that rezoning the property to I-G could enable land uses in the future that may not be as low-intensity or context-sensitive as the current proposal. Additional long-term impacts that should be evaluated prior to rezoning include:

- Form and Scale: The current height limitation in the R-L District is 38 feet, which would increase to 45 feet maximum height if rezoned to I-G.
- Traffic and Access: College Drive is an extremely limited roadway. Expanding the I-G District and changing land uses is an opportunity to evaluate the future need for roadway improvements.

The LVPC also encourages continued engagement with residents of the adjacent neighborhood to ensure context-sensitive development and cohesive community identity (of Policy 5.4). Overall the intent of the rezoning aligns with *FutureLV* by increasing educational opportunities and supporting reuse in urban areas, and the LVPC encourages the City to evaluate long-term impacts of expanding the I-G District to balance institutional growth with the intended preservation of neighborhood character.

Municipalities, when considering Zoning Map 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 if you have any questions.

Sincerely,



Joseph Dotta  
Regional Planner



Jill Seitz  
Chief Community and Regional Planner

cc: Michael Hanlon, Allentown City Clerk.