



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

COMPREHENSIVE PLANNING COMMITTEE MEETING
Tuesday, August 25, 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*: City of Allentown – Land Use of Regional Significance – Cedar Crest College Field House (JS)
2. *ACTION ITEM*: Palmer Township – Land Use of Regional Significance – 1492 Van Buren Apartments Phase II (JW)
3. *ACTION ITEM*: Whitehall Township – Zoning Ordinance and Map Amendment – LVHN (JW)
4. *ACTION ITEM*: Lower Saucon Township – Zoning Ordinance Amendment – Impervious Surface (SM)
5. *ACTION ITEM*: Lower Mount Bethel Township – Zoning Ordinance Amendment – Data Centers (JS)
6. *ACTION ITEM*: Salisbury Township – Zoning Ordinance Amendment – Data Centers and Miscellaneous (JS)
7. *ACTION/PRESENTATION ITEMS*: Housing Supply and Attainability Strategy (JS, JW)
 - a. *ACTION ITEM*: Housing Supply and Attainability Strategy Plan Recommendation to Full Commission
 - b. *PRESENTATION ITEM*: New Housing Data Dashboard Demonstration
 - i. *REMINDER*: Unlocking Housing Solutions Event, August 26, 2026 at 8:00 AM, DeSales University – University Center, 2755 Station Avenue, Center Valley, PA 18034

Next Comprehensive Planning Committee Meeting:
September 22, 2026, at 12:00 noon



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PHILLIPS ARMSTRONG
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BECKY A. BRADLEY, AICP
Executive Director

August 18, 2026

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

**Re: Cedar Crest College Field House – Land Use of Regional Significance
City of Allentown
Lehigh County**

Dear Ms. Gomez,

The application proposes to construct a 4,000-square-foot athletic facility at the Cedar Crest College facility located at 2601 William Penn Highway (parcel number 548674939116). The redevelopment involves the removal of two tennis courts.

This project is considered a land use of regional significance under *FutureLV: The Regional Plan* in the 'Educational Facilities' category. The Lehigh Valley Planning Commission (LVPC) considered the application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC).

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
August 25, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	August 27, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

Site Suitability and Land Use

The property is within an area identified for Development in the General Land Use Plan of *FutureLV: The Regional Plan*. The project supports 'reuse and redevelopment in urban areas' (of Policy 1.1), and 'invests in schools located along corridors (of Policy 4.3). Further, the improvement of existing facilities 'encourages local institutions to invest in their surrounding communities' (of Policy 4.1) and 'supports cultural and social programs' (of Policy 5.2).

The proposed athletic facility further contributes to the College's role as an educational and community institution by providing space that supports physical activity, recreation and social interaction. Investment in facilities that encourage active lifestyles helps to 'create community spaces that promote physical and mental health' (of Policy 5.3). The LVPC encourages Cedar Crest College to explore opportunities for community partnerships or public access to the facility where operationally feasible, to expand the benefits of the investment beyond the campus population and support social programming, equitable access to community resources and

healthy communities (of Policies 5.2 and 5.3).

Transportation

The proposed athletic facility is located within an established institutional campus with an existing transportation and pedestrian network. The project includes extending the existing sidewalk to the proposed fitness center and existing tennis courts, which 'provides a safe, well-maintained transportation network to move people' (of Policy 2.2) and 'ensures transportation accessibility for all persons' (of Policy 5.2).

The LVPC also encourages bicycle parking in a convenient and visible location near the facility entrance. Connecting bicycle accommodations to the broader campus pedestrian network supports opportunities for alternative transportation and 'improves bicycle infrastructure' and integrates mixed transportation into public spaces (of Policies 2.3 and 5.2).

Sustainability

The LVPC encourages Cedar Crest College to incorporate sustainable building practices into the athletic facility that reduce long-term operating costs and environmental impacts. Opportunities may include high-efficiency building systems, geothermal or heat-pump systems, rooftop solar, green roofs, water-efficient fixtures and greywater or rainwater reuse where feasible. These investments would 'minimize environmental impacts of development' (of *FutureLV* Policy 3.1) and encourage 'sustainable building, site design and community design practices' while helping to reduce climate change impacts (of Policy 3.4).

As an educational institution, Cedar Crest College also has an opportunity to use sustainable building systems as visible educational features for students and visitors. Interpretive signage or integration with academic programming could allow the facility itself to demonstrate sustainable development practices while expanding educational opportunities on campus.

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,



Jill Seitz
Chief Community and Regional Planner

cc:
Cedar Crest College, Applicant;
Paul Szewczak, 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;
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

August XX, 2026

Craig Beavers, Planning Director
Palmer Township
3 Weller Place
Palmer, PA 18045

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

**Re: 1492 Van Buren Road Phase 2
Palmer Township and Lower Nazareth Township
Northampton County**

Dear Mr. Beavers and Ms. Seese,

This project is considered a land use of regional significance under *FutureLV: The Regional Plan* in the 'Mixed-Use Development' category. The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). The meetings will be held on:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
August 25, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	August 27, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The LVPC addresses this letter to representatives of Palmer Township and Lower Nazareth Township to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4).

Background

The application proposes the construction of 320 apartment units across seven four-story apartment buildings, three twelve-car garages, a clubhouse with associated amenities, and two bridges crossing over Schoeneck Creek providing access to the site from Phase 1. The LVPC previously reviewed Phase 1 of this project in October 2025. Both phases are at 1492 Van Buren Road (PIN: K8 10A 1). The plans specify that the site will be served by public sewer and water connections established in Phase 1.

The project site is currently agricultural use. Nearby existing uses include agricultural lands to the south which have adjacent commercial and residential neighborhood adjacent to it. North of the site is Route 33, which the project will not have direct access to, buffering several

warehouses and commercial areas. West of the property is the Phase 1 development, which is adjacent to both warehouses and dense housing uses.



Google Aerial Imagery

Land Use Site Suitability

The *FutureLV: The Regional Plan* General Land Use Plan identifies the site as a Development Area, which has most or all the factors needed to support growth. However, *FutureLV* also outlines several development criteria for where development may be considered appropriate if the criteria are met.

One of the development criteria outlined in *FutureLV* is if 'the site is contiguous to existing development'. The site has several land uses surrounding it, including agriculture, large-scale retail, warehousing, and nearby high-density, single-family homes where the the largest impacts come from the adjacent Route 33. While the proposal is located in the Development area of the General Land Use Plan (*FutureLV: The Regional Plan*), constructing housing in close proximity to a highway is not advisable in the interest of the public health, safety and welfare (of Policy 3.2). Residents are likely to be affected by noise pollution and low air quality, especially diesel fumes.

The proposed development does support efforts to alleviate the regional housing shortage. According to the Lehigh Valley Housing Dashboard, Palmer Township is experiencing a shortage of 269 housing units today, and an additional 2,688 units are needed by the year 2050 to keep up with the Township's anticipated population growth. The proposal helps meet the Township's housing demand while increasing attainable housing opportunities (of Policy 4.5).

More information about housing in Palmer and throughout the Lehigh Valley is available at lvpc.org/housing.

The addition of the clubhouse, proposed pool, and proposed pickleball court also support the housing providing amenities to residents which 'create community spaces that promote physical and mental health' (of Policy 5.3).

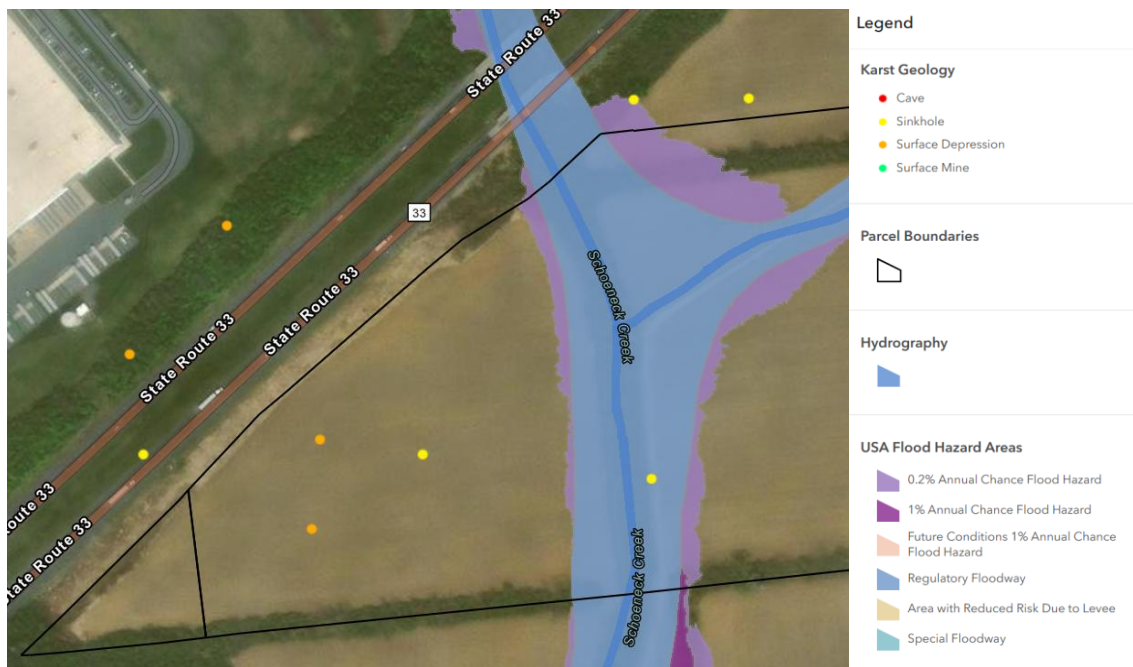
Environment

One of the criteria looks at whether 'the proposal is consistent with the conservation of high priority natural resources' which is outlined in the Natural Resources Map in *FutureLV*. The site contains high-priority natural resources that will be impacted by the development.

- The Schoeneck Creek runs directly through the site and while the project does utilize this area as open space, the proposed plan shows the addition of two bridge crossings which will need to be carefully designed to minimize adverse impacts to the existing sensitive environmental features. Wetland areas are identified adjacent to the Creek, per the National Wetland Inventory, and these areas need to be professionally delineated to confirm their location, per state and federal regulations. The Riparian Buffer, which serves to help reduce runoff and stream erosion, is also identified in the National Heritage Inventory as a Supporting Landscape, where the creek area and floodplains serve as habitats for endangered and sensitive species. The NHI report specifically identifies the wetland fragments as the backbone to these habitats, with the species relying on the canopy of the riparian buffer. The LVPC recommends the preservation of these sensitive areas to 'protect high-priority natural lands and water resources' and 'maximize preservation of woodlands and critical habitats' (of Policy 3.1).



Mapping provided by LVPC, National Hydrography Dataset, National Wetland Inventory, and Pennsylvania Natural Heritage Program



Mapping provided by LVPC, National Hydrography Dataset, Federal Emergency Management Agency, and Bureau of Topographic and Geologic Survey

- The site also contains several hazards to development. Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karst in the form of surface depressions and sinkholes on the site. The LVPC advises the applicant to ensure proper geotechnical testing prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2). The current plans submitted do not match the submitted geotechnical analysis, and the construction details and geotechnical analysis does not discuss mitigation techniques to be employed as a part of the land development process. Additionally, the project is also located in a flood plain mapped by the Federal Emergency Management Administration (FEMA). While the proposed site configuration avoids the 100-year flood plain, The LVPC recommends additional floodproofing measures and mitigation for the first floors to reduce the risk of property damage and support long-term community resilience thereby 'minimizing environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2) and 'reducing potential impacts of hazards to promote community resiliency' (of Policy 5.2).

The development criteria also look at, 'Adequate sewage conveyance capacity, allocation, and treatment capacity' available at the site and if 'the site will be served by public water with adequate supply and delivery capacity'. As the site will be served by public sewer and water, the project 'matches development intensity with sustainable infrastructure capacity' (of Policy 1.1) and 'promote development in areas with public sewer and water capacity' (of Policy 3.2).

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

‘manage the rate, volume and quality of storm runoff’ and ‘minimize environmental impacts of development to protect the health, safety, and welfare of the public’ (of Policy 3.2) The LVPC supports the inclusion of electrical vehicle charging spaces at the site to serve the residents and ‘advance deployment of alternative fueling infrastructure’ (of Policy 2.5).

The LVPC notes that the landscaping plan includes double the number of tree coverage required by Township code, but the overall landscaping plan does not currently indicate other types of foundation or buffer plantings (native shrubs, or grasses) around each individual building. The proposed development has a significant amount of paved surface with little shading, which can intensify the heat island effect raising temperatures around the buildings and parking areas. The LVPC recommends adding additional native, climate-adaptive and carbon sequestering landscaping to ‘reduce climate change impacts through mitigation and adaptation’ (of Policy 3.4).

An additional area of focus could be the green space behind the community center, which is directly adjacent to the highway and is intended to be left as cultivated fields. With its proximity to the highway and lack of improvements to promote use as open space for the residents, it likely will not ‘create community spaces that promote physical and mental health’ (of Policy 5.3).

Transportation

Another development criteria is 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 application included a Traffic Impact Study which estimated 1,427 new trips would be generated by the proposed development.

The site location map provided with the Traffic Access Study (TAS) incorrectly shows the project site location. The build traffic volumes may be inaccurate due to the incorrect site location and site driveways noted in the Traffic Access Study. The site plan provided with the TAS only shows Phase 1 of the plan, however the development plan in this review is specific to Phase 2. The LVPC strongly recommends the developer to provide an updated and accurate Traffic Access Study to make sure that the correct information is represented.

SITE & EMERGENCY ACCESS

Clear and adequate wayfinding and regulatory signage should be provided throughout the site to guide vehicles, including emergency responders, and to support safe and efficient internal circulation. Due to the proximity of distribution centers near the site, special attention should be paid to truck signage and wayfinding as well. The applicant’s commitment to installing stop signs at each site exit is noted and supported.

It is recommended that the emergency access entrance to Van Buren Road be maintained at all times, especially during winter weather events to ensure continuous access for emergency vehicles. Coordination with local emergency services is strongly recommended to create awareness by emergency responding agencies, as well as educating residents on emergency response. (of *FutureLV* policies 2.2 & 5.1)

TRANSPORTATION NETWORK MOBILITY

The addition of EV charging stations in many of the parking spaces in the development is noted by the LVPC. These charging stations will allow residents of the development greater opportunity to transition to electric and hybrid vehicles. (of *FutureLV* Policies 2.5 + 3.4)

Given the residential nature of the development, consideration should be given to school bus circulation and stop locations. Safe and accessible locations for student pick-up and drop-off should be identified, minimizing conflicts with through traffic and ensuring pedestrian safety. Turning radii should also be considered.

MULTIMODAL TRANSPORTATION CONSIDERATIONS

Pedestrian infrastructure including sidewalks, cross walks, and curb extensions at intersections are proposed for the site. The site also has a walking path located in the open space areas in Phase 1 on the site. This is commended by the LVPC. The LVPC encourages a connection to this walking path directly from the network of sidewalks within the site. The current layout shows the only pedestrian connection is along Van Buren Road. A walking path should also be considered along Schoeneck Creek within the Greenspace Park Open Area identified on the land development plans. This could connect to the walking path noted in Phase 1.

Bike racks and other bike infrastructure is recommended by the LVPC. These would increase the accessibility and safety of alternative modes of transportation. Priority should be given to the club house and pool as they will be accessed by more residents. (of *FutureLV* Policy 2.3) Given its distance to the Phase 1 townhouses, and some of the outlying apartment buildings (such as building #23 & 21), the LVPC recommends at a minimum the inclusion of a bicycle rack at the clubhouse to 'create community spaces that support physical and mental health' (of Policy 5.3).

TRANSIT AND WORKFORCE

Sidewalk connections should be planned for the Lehigh and Northampton Transportation Authority (LANTA) route 106 bus stops north of the site along the frontage on Van Buren Road. Coordination with LANTA regarding the development and expansion of the site is recommended to raise awareness of alternative transit options for residents. (of *FutureLV* Policy 2.2)

Stormwater Review

The project site is located within the Bushkill Creek watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments related to our review of the project's stormwater management plan are included as attachment 1.

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

Sincerely,



Jacob Weinberg

Community and Regional Planner



Susan Myerov
Director of Environmental Planning



Jacob Engbert
Transportation Planner

DRAFT

DRAFT



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

August 7, 2026

Ms. Lee Rackus, Planning Director
Whitehall Township
3219 MacArthur Road
Whitehall, PA 18052

**Re: Zoning Ordinance and Map Amendment – LVHN
Whitehall Township
Lehigh County**

Dear Ms. Rackus,

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

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
August 25, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	August 27, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The application proposes amending the Whitehall Township Zoning Ordinance to allow Health Care Campus's in the R-3, Low/Medium Density Residential Zone, and the Township's Map to change 3230 MacArthur Road (PIN: 548898689455), a 147-acre lot, to R-3 from R-2, Low Density Residential.

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

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

- **Definitions** – The ordinance distinguishes different types and aspects of a Health Care Providing definitions encourages clarity and 'minimizes impacts of regionally significant land uses' (of Policy 1.4)
- **Utilities** – the ordinance requires that Healthcare Campus's be served by public sewer and water systems which 'minimizes environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2) and 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).
- **Buffer Yards as Hazard Mitigation** – the amendment proposes allowing steep slopes or existing natural coverage as a part of the overall buffer design. The LVPC commends this inclusion for 'discouraging development in hazard-prone areas' (of Policy 3.2).

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

- **Site Requirements** – The LVPC commends the inclusion of a provision not requiring several aspects of the zoning code such as dimensional, area, and yard requirements on the campus for 'promoting context-specific design solutions' (of Policy 5.4). Within this section, the ordinance exempts development from requiring both frontage and coverage requirements. The LVPC recommends the township consider the implication for the construction of sidewalks in order to 'provide a safe, well-maintained transportation network to move people and goods efficiently, while capitalizing on existing infrastructure' (of Policy 2.2), and stormwater management in order to 'manage the rate, volume and quality of storm runoff' (of Policy 3.2).
- **Dimensional, Area, and Coverage Requirements** – the ordinance proposes several specific requirements for the overall campus dimensional requirements, including a minimum lot size of thirty acres and a maximum lot size of fifty acres. Given the one hundred and fifty seven acre lot being converted as a part of the application, the LVPC recommends the township consider whether these campus sizes are appropriate to both contain and limit Healthcare Campus's in order to 'increase the social, economic and environmental well-being of the region' (of Policy 1.1).
- **Native Planting** – The LVPC recommends the inclusion of a provision requiring the 'use of native, climate-adaptive and carbon-sequestering landscaping' (of Policy 3.4).
- **Signage** – The LVPC commends the inclusion of specific sign regulations 'promoting context-specific design solutions' (of Policy 5.4). The LVPC recommends the inclusion of signage planning for emergency vehicles to 'enhance planning and emergency response efforts among emergency management personnel' (of Policy 5.1) and for freight deliveries to 'strengthen freight mobility to minimize quality of life impacts to residents' by 'encouraging designation of truck routes' (of Policy 2.4).

The proposal also includes a map amendment highlighting a potential area where the Healthcare campus might be built. The LVPC makes the following recommendations in order to support public health, safety, and welfare:

1. Mapping provided by the Bureau of Topographic and Geologic Survey at the Pennsylvania Department of Conservation and Natural Resources indicates the extensive presence of karsts in the form of surface depressions on the site. The LVPC advises the applicant be required to ensure proper geotechnical testing prior to any land development, to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).
2. The site is in close proximity to several existing Lehigh and Northampton Transportation Authority (LANTA) bus stops. The LVPC recommends the township requires applicants coordinate with LANTA on any potential multi-modal connections to the healthcare campus to 'encourage enhanced transit connections to improve mobility and job access' by 'enhancing public transit service and walk/roll facilities along corridors' (of Policy 2.3)

Municipalities, when considering zoning ordinance amendments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article I§105, Article III§303, §304 & §306(a), Article VI§603(j)]. Please feel free to reach out with any questions about this review.

Sincerely,



Jacob Weinberg
Community and Regional Planner

Cc:
Elisa Highley, Township Engineer.

DRAFT



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

August 19, 2026

Mr. Jay Finnigan, Acting Manager
Lower Saucon Township
3700 Old Bethlehem Pike
Bethlehem, Pennsylvania 18015

**Re: Proposed Ordinance Revisions - Impervious Coverage
Lower Saucon Township
Northampton County**

Dear Mr. Finnigan:

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

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Committee Meeting:**

August 25, 2026, at 12:00 PM (Virtual)
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**LVPC Full Commission
Meeting:**

August 27, 2026, at 7:00 PM (Virtual)
<https://lvpc.org/lvpc-meetings>

The proposed ordinance amends 180-5, titled Definitions, to delete Impervious Surface Area and add Impervious Surface Ratio, amends the lot requirement requirements in the several residential zoning districts. The ordinance replaces it with a chart setting forth the minimum open space, lot area, impervious surface coverage, lot width, front, side, and rear yard requirements, and maximum building heights for single family detached cluster, duplex, and attached dwellings in the various zoning districts where they are permitted.

Other proposed revisions include deleting 180-127.3, and replacing it with a new 180- 127.3, which requires that if an applicant for a permit to construct a single-family dwelling is not the intended occupant, the maximum impervious surface allowed shall be 85% of that allowed in the zoning district.

The LVPC supports the township's effort to right-size impervious surface areas to 'manage the rate, volume and quality of storm runoff' (of Policy 3.2) and the use of one chart and one standard for impervious surface calculations which 'encourages an efficient development process that is responsive to regional needs' (of Policy 1.4).

Mr. Nagy
Lower Saucon Township
March 12, 2026
Page 2

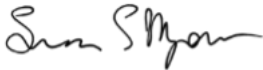
The proposed revision to 180-127.3, requiring different impervious surface calculations depending on the applicant, may be in conflict with MPC Section 605 which states 'where zoning districts are created, all provisions shall be uniform for each class of uses or structures'. The LVPC recommends consulting with the township solicitor on the legality of this provision.

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

Sincerely yours,



Jacob Weinberg,
Community and Regional Planner



Susan Myerov
Director of Environmental Planning

Attachment

cc: Carol Schneider, Administrative Assistant: c.schneider@lowersaucontownship.org
Brien Kocher, Engineer: bkocher@hanovereng.com
Stacy Werkheiser, Administrative Assistant: swerkheiser@lowersaucontownship.org
Molly Bender, Zoning Secretary; mbender@lowersaucontownship.org
receptionist@lowersaucontownship.org



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BECKY A. BRADLEY, AICP
Executive Director

August 14, 2026

Melissa Mastrogiovanni, Asst. Manager / Secretary / Planning Administrator
Lower Mount Bethel Township
2004 Hutchinson Avenue
Martins Creek, PA 18063

**Re: Zoning Ordinance Amendment – Data Centers
Lower Mount Bethel Township
Northampton County**

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

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The application proposes to amend the Township Zoning Ordinance to establish regulations for Digital Infrastructure Facilities. The amendment proposes to permit these by conditional use within the Industrial District and establishes standards addressing land use impacts.

The LVPC offers the following recommendations to further strengthen the amendment and ensure that its protections remain legally defensible under Pennsylvania law. Because several provisions implicate authority assigned by state law to other agencies or extend beyond customary zoning performance standards, the LVPC strongly recommends that the Township Solicitor specifically review the provisions identified below prior to enactment.

Conditional Uses and End User Identification

The LVPC supports requiring sufficient information at the conditional use stage to understand the type, scale and operational characteristics of the facility being proposed. However, the requirement to identify the proposed end user should remain flexible

because industrial buildings and data center campuses may be developed before a specific tenant is finalized or may change users over time. A more legally defensible approach may be to regulate measurable operational characteristics regardless of tenant, and require applicants to identify anticipated user types and conservatively estimate impacts. The ordinance could require identification of the end user *if known*, and otherwise require an operational profile identifying the facility type and function, maximum electrical demand, cooling method, backup generation, water demand, anticipated employment and other characteristics necessary to demonstrate compliance. This approach focuses the Township's review on the impacts of the land use rather than the identity of a particular corporation. This approach supports the obligation of the Township to provide a fair and impartial review of any and all applications.

Utilities

The amendment appropriately requires disclosure of maximum electrical demand at full buildout, identification of project-related substations and other infrastructure, and documentation from the serving utility concerning capacity. These requirements directly support matching development intensity with infrastructure capacity (of Policy 1.1) and expanding and reinforcing electric utility capacity for future technology and jobs (of Policy 2.5).

However, the ordinance also requires extensive documentation concerning offsite utility infrastructure, all utility applications and correspondence, and alternative substation siting or design alternatives. These provisions should be carefully evaluated to maintain the distinction between municipal land use regulation and regulation of public utilities. The Pennsylvania Municipalities Planning Code expressly preserves the Pennsylvania Public Utility Commission's (PUC) authority over the implementation, location, construction and maintenance of public utility facilities (MPC §608.1(d)), and provides a process through which certain public utility buildings may be exempted from local zoning following PUC review (MPC §619). The ordinance already states that the Township does not regulate utility service, interconnection or energy markets; the substantive standards should consistently reflect that limitation.

Water Resources and DRBC Coordination

The intent of the ordinance provisions addressing water supply, groundwater, cooling water, stormwater and process water support conserving water resources (of Policy 3.1). Pennsylvania law permits zoning provisions addressing the availability of a reliable and adequate water supply. The ordinance should therefore remain focused on demonstrating the availability of water, evaluating local land use and environmental impacts, and documenting compliance with outside regulatory approvals rather than independently regulating the amount of a withdrawal. The MPC does not authorize municipalities to regulate water allocation or withdrawal where those matters are otherwise regulated by the PUC or state or federal agencies.

The ordinance currently references specific Delaware River Basin Commission (DRBC) thresholds. Because DRBC jurisdiction can vary by source, type of use and regulatory

program, and those standards can change independently of the Township ordinance, the LVPC recommends requiring documentation of all applicable DRBC approvals, permits or determinations rather than codifying regulatory thresholds that may later become outdated or may not apply uniformly to every project.

Setbacks, Buffers and Availability of the Use

The LVPC supports substantial separation, screening and buffering where high-intensity industrial activity is adjacent to residences, schools, public spaces and other incompatible uses. These measures protect rural and scenic character (of Policy 1.3), minimize environmental and quality-of-life impacts (of Policy 3.2), and implement context-specific design (of Policy 5.4). The ordinance combines significant setbacks and buffers, including 500-foot residential buffers, 300-foot buffers from certain nonresidential Sensitive Receptors and a 1,000-foot setback for fuel storage.

Prior to adoption of the ordinance amendment, the LVPC recommends that the Township conduct a parcel-level GIS analysis to confirm that a meaningful opportunity remains for the use. Where possible, the greatest separation distances should be tied to the particular impact being mitigated and to incompatible or sensitive uses rather than applying the same degree of separation from every compatible industrial property. Pennsylvania courts have historically recognized a de facto exclusion of a land use where an ordinance imposes dimensional requirements that make the use effectively impossible.

Land Use Performance Standards

FutureLV supports strong, measurable outcomes for water consumption, containment, thermal impacts, noise, vibration, fire access and public safety to ‘minimize environmental impacts of development’ (of Policy 3.2). However, the LVPC encourages the Township to evaluate provisions that may move from regulating land use impacts toward prescribing particular mechanical, cooling, electrical or fire protection design methods that may cause conflicts with the Pennsylvania Uniform Construction Code (UCC). Additionally, the technology industry is evolving rapidly with newer cooling systems that operate more sustainably than current options. Instead, the LVPC recommends regulating the performance outcomes to maintain strong public health objectives of without overlapping other regulatory systems.

Post-Construction Studies and Financial Security

Post-construction noise and vibration verification is a valuable tool because operational conditions may differ from modeled conditions, and continued compliance can appropriately be enforced through the Zoning Ordinance. However, the Township should carefully review the proposed requirements tying post-occupancy studies or operational verification to the release of subdivision and land development financial security. The MPC generally establishes financial security to guarantee completion of improvements required as part of final plat approval (MPC §509). Security is released as improvements are completed. Long-term operational compliance is better treated through ongoing zoning enforcement.

Transportation

Requiring a traffic impact analysis addressing construction traffic, oversized equipment deliveries, haul routes, staging and temporary traffic control is appropriate and supports efficient infrastructure planning and protection of community quality of life. The ordinance should retain clear requirements addressing site access, onsite circulation and construction management. However, the provision authorizing the Township to require “reasonable traffic management or mitigation measures” should be clarified so it is not interpreted as open-ended authority to impose offsite roadway improvements through the conditional use decision. MPC §603(c)(2) expressly provides that, in allowing a conditional use, a governing body may impose reasonable additional conditions and safeguards other than those related to offsite transportation or road improvements. Offsite improvements should instead be addressed through the applicable subdivision and land development, PennDOT Highway Occupancy Permit, transportation impact fee or other legally authorized process.

Decommissioning and Financial Security

The LVPC supports establishing a clear process for facilities that become abandoned and for the safe removal and disposal of potentially hazardous infrastructure such as generators, fuel systems, batteries, and other electronic equipment. This advances *FutureLV*’s direction to ‘provide environmentally responsible electronic and hazardous waste disposal’ and to enhance the long-term viability of community assets (of Policies 3.2 and 1.3).

The LVPC recommends having the Township Solicitor identify the legal mechanism supporting the long-term decommissioning financial security requirement, and establish a defensible calculation methodology and enforcement process before enactment.

Additionally, the amendment requires removal not only of specialized equipment but of all buildings, structures and improvements following prolonged cessation and requires financial security sufficient to guarantee decommissioning, removal, disposal and site restoration for the life of the facility. The Township should consider whether mandatory demolition of otherwise reusable buildings is necessary in every circumstance or whether the standard should instead prioritize restoring the property to a safe and reusable condition. Adaptive reuse of viable industrial structures may better support long-term asset management and *FutureLV*’s emphasis on efficient use of developed land.

Overall, the central planning direction or goal of the amendment is aligned with *FutureLV: The Regional Plan*, as long as, above outlined legal issues and vulnerabilities are addressed.

In terms of overall consistency with *FutureLV: The Regional Plan*, the proposed ordinance works to achieve the following:

- Permitting the use through the Industrial District and requiring evaluation at full buildout helps the Township guide the location and intensity of development and ‘match development intensity with sustainable infrastructure capacity’ (of Policy 1.1).
- Requiring disclosure of electrical demand and coordination with infrastructure providers supports *FutureLV*’s direction to ‘expand and reinforce electric utility capacity’ while preparing for future technology and jobs (of Policy 2.5).
- The Environmental Impact Assessment, groundwater and water supply analysis, cooling water disclosure, stormwater protections, hazardous material management and electronic waste provisions support the conservation of natural lands and water resources and the protection of public health, safety and welfare (of Policies 3.1 and 3.2).
- Provisions establishing acceptable levels of noise, vibration, and lighting support minimizing environmental impacts of development (of Policy 3.2).
- The substantial attention to emergency access, hazardous materials and coordination with emergency responders likewise advances the goal to ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).
- Finally, building articulation, landscaping, equipment screening and other compatibility standards support the Township’s rural character and *FutureLV*’s direction to preserve environmental, scenic and agricultural assets and promote context-specific design (of Policies 1.3 and 5.4).

The recommended revisions and additional legal review are intended to strengthen enforceability rather than reduce those protections. Municipal ordinances should establish clear, objective and enforceable standards for the land use impacts the Township has authority to regulate, while recognizing the responsibilities assigned by federal and Commonwealth law to other authorities. Enforceable regulations support an efficient development process, provide greater clarity to applicants, and improve the Township’s ability to administer its regulations over the long term (of Policy 1.4).

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

Sincerely,



Jill Seitz
Chief Community and Regional Planner

cc:
Justin Coyle, Township Engineer;
Nick Graziano, Upper Mount Bethel Township Manager;
Sharon Cifuentes, Washington Township Secretary/Treasurer;
Paige Stefanelli, Plainfield Township Manager;
Donna Asure, Forks Township Manager;



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

Ms. Kerry Rabold, Director of Community Development
Salisbury Township
2900 South Pike Avenue
Allentown, PA 18103

**Re: Zoning Ordinance Amendment – Data Centers and Miscellaneous
Salisbury Township
Lehigh County**

Dear Ms. Rabold,

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

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
August 25, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	August 27, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The application proposes to amend the Township Zoning Ordinance to address a range of land uses and regulatory standards, including Data Centers, Bed-and-Breakfasts, and Cluster Housing. The LVPC supports the Township's proactive effort to update its land use regulations in response to evolving development patterns. The proposed Data Center provisions in particular address many of the potential infrastructure, environmental and community impacts associated with this emerging land use. The LVPC offers the following recommendations to further strengthen the amendment and ensure that its standards remain clear, measurable and administratively and legally defensible.

Definition and Conditional Use

Permitting Data Centers as a Conditional Use in the Industrial District helps the Township guide the location and intensity of development and 'match development intensity with sustainable infrastructure capacity' (of Policy 1.1).

The proposed definition establishes a Data Center as the primary use of a property when the use occupies 35% or more of the interior floor space of a building. An alternative or supplemental approach would be to distinguish between principal and accessory Data Center uses based on the purpose and operational characteristics of the facility. Establishing clear classifications and objective standards supports an 'efficient development process responsive to regional needs' (of Policy 1.4).

The LVPC notes that the ordinance preamble states that ‘House Bill 1834 of the 2025-2026 Pennsylvania legislative session established regulatory duties for commercial data centers’. House Bill 1834 remains pending legislation and has not been enacted. Because the Township's authority to establish land use regulations for Data Centers does not depend upon enactment of House Bill 1834, the LVPC recommends removing this reference prior to ordinance adoption. Removing the reference would avoid the need to account for future amendments or changes in the status of the legislation.

Utilities

The amendment appropriately requires disclosure of anticipated electrical, water and wastewater demand and documentation from the applicable service providers. These provisions directly support ‘matching development intensity with sustainable infrastructure capacity’ (of Policy 1.1) and expanding and reinforcing electric utility capacity to prepare for future technology and jobs (of Policy 2.5).

However, the proposed standards also require the applicant to demonstrate that a Data Center will cause no adverse impact to electrical service throughout the Township or to water and sewer availability, flow or pressure within a two-mile radius. A utility or authority is generally in the best position to determine whether adequate system capacity exists and what improvements may be necessary to provide service. The ordinance should instead require documentation from the applicable service provider confirming that the anticipated project demand has been disclosed, identifying whether adequate capacity is available or can be made available and identifying any known project-related improvements necessary to provide service. The Township can then evaluate the land use impacts associated with those improvements. The Township Solicitor should review these provisions to ensure that the ordinance maintains an appropriate distinction between municipal land use regulation and matters assigned to utilities and other regulatory agencies. The Pennsylvania Municipalities Planning Code expressly preserves Pennsylvania Public Utility Commission authority over the implementation, location, construction and maintenance of public utility facilities and does not authorize municipal regulation of water allocation or withdrawal where those matters are otherwise regulated (MPC §608.1(d) and (f)). Refining requirements to focus on information that can reasonably be demonstrated through the land use review process supports best practices in land use and land development regulation (of Policy 1.4).

Environmental Impacts

The Environmental Impact Study requirement provides an important framework for evaluating the potential resource and environmental impacts of Data Center development. Requirements addressing water consumption, wastewater generation, stormwater, energy demand, backup power and related operational impacts support conserving natural and water resources (of Policy 3.1) and ‘minimize environmental impacts of development to protect the health, safety and welfare of the public’ (of Policy 3.2).

The ordinance appropriately requires the Environmental Impact Study to identify emissions and other environmental impacts associated with auxiliary and backup power facilities. The LVPC recommends that this analysis consider the cumulative emissions associated with the number and capacity of generators proposed, including routine testing as well as emergency operation, and document any applicable Pennsylvania Department of Environmental Protection air-quality permits. Addressing these impacts supports *FutureLV*’s direction to ‘improve regional air quality’ and ‘minimize and mitigate the impacts of utility expansion associated with technological advancements, population and business growth’ (of Policy 3.2).

Data Centers generate substantial heat that must be continuously removed through cooling and

heat-rejection systems. The LVPC recommends expanding the Environmental Impact Study requirement to identify proposed heat-rejection equipment and evaluate whether exhaust could result in localized ambient temperature increases on adjacent properties. Where impacts are identified, applicants should describe measures to dissipate, mitigate or beneficially reuse waste heat. Addressing thermal impacts further supports minimizing environmental impacts to protect public health, safety and welfare (of Policy 3.2). The Township may also encourage cool roofs, shade trees, vegetated areas and other strategies that reduce heat absorption and localized heat-island effects to 'encourage reuse, sustainable building, site design and community design practices' (of Policy 3.4).

The amendment requires all Data Centers to utilize closed-loop cooling systems that conserve and minimize water use. While the intent of this provision strongly supports resource conservation, the LVPC recommends establishing a performance standard rather than requiring a particular cooling technology. Data center technology is evolving rapidly, and newer systems may provide equivalent or superior water conservation while using different cooling methods. A better practice is to regulate measurable land use impacts and performance outcomes rather than prescribe particular mechanical or engineering methods, especially where those systems may also be subject to other technical or construction codes.

Because the amendment requires applicants to disclose anticipated electrical consumption and report electricity use annually, the Township may also wish to require applicants to identify measures proposed to improve energy efficiency. An industry-recognized efficiency measure, such as Power Usage Effectiveness or an equivalent metric appropriate to the facility, could provide additional context for evaluating how effectively energy is being utilized. Encouraging energy-efficient facility design, renewable or lower-impact energy sources where feasible, climate-adaptive landscaping and other sustainable site practices advances *FutureLV's* direction to 'promote energy conservation and efficiency,' 'support renewable energy and diversification of sources' and 'reduce climate change impacts through mitigation and adaptation' (of Policy 3.4).

Setbacks and Buffers

The proposed ordinance requires Data Center structures to be located at least 1,000 feet from any residence, school, place of worship, life-care facility or day-care facility, including structures located in neighboring municipalities. This requirement applies in addition to a ten-acre minimum lot area and a 50-foot landscaped buffer along rear and side property lines. These measures minimize environmental and quality-of-life impacts (of Policy 3.2) and promote context-specific design solutions (of Policy 5.4).

Prior to adoption, the LVPC encourages the Township to conduct a parcel-level GIS analysis to confirm that a meaningful opportunity remains for the use after applying the combined dimensional standards. Pennsylvania courts have historically recognized that zoning standards may result in a de facto exclusion where dimensional requirements make an otherwise permitted legitimate land use effectively impossible.

Noise and Operational Impacts

The LVPC supports requiring a sound study at the conditional use stage, compliance with the Township's established noise requirements and post-construction monitoring. Data center mechanical equipment and backup generation can operate differently from conventional industrial uses, and measurable performance standards are important to minimizing environmental and quality-of-life impacts (of Policy 3.2).

The proposed annual reporting provision also provides a useful mechanism for comparing actual conditions with those anticipated during the development review process. The LVPC recommends ensuring the ordinance clearly specifies the methodology for quarterly sound measurements, including measurement locations, operating conditions and applicable measurement standards. Routine operations, scheduled generator testing and actual emergency operations should be distinguished where they create materially different sound conditions.

The Township should also consider requiring applicants to provide the number and capacity of any proposed backup generators, anticipated routine testing duration and frequency and whether units may be tested simultaneously. Routine testing standards can then be structured to minimize impacts on surrounding properties while maintaining necessary facility reliability.

Emergency Preparedness

The amendment requires an Emergency Preparedness Plan, and requires the applicant to demonstrate that the facility will not create a substantial risk to first responders. The LVPC recommends expressly requiring coordination with Township emergency service providers and, where appropriate, the Lehigh County Office of Emergency Management. Data Centers often include high-voltage electrical infrastructure, batteries, fuel storage, specialized fire-suppression systems and other equipment that require facility-specific emergency response planning. Coordination between the applicant and emergency service providers helps ‘enhance planning and emergency response efforts among emergency management personnel’ (of Policy 5.1).

The LVPC encourages the Township to consider decommissioning provisions, including procedures for the safe removal, recycling or disposal of any servers, batteries, electronic waste and related materials when equipment is replaced or a facility ceases operation. This would ‘provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling’ (of Policy 3.2).

Miscellaneous Revisions

The proposed definition of Bed and Breakfast includes uses commonly referred to as Airbnb or VRBO, and permits a property owner to reside elsewhere and rent the entire dwelling as a single unit. This combines two land uses that may have different operational characteristics: a traditional Bed and Breakfast, where an operator generally occupies or manages the property and may provide guest services, and a whole-dwelling Short-Term Rental. The LVPC recommends establishing separate definitions for Short-Term Rental and Bed-and-Breakfast uses, to allow clearly established standards appropriate to each use.

The amendment adds clarification to the Township’s existing Cluster Housing Development Option. Cluster development provides an alternative to conventional residential development patterns by allowing homes to be arranged more efficiently while preserving shared open space and creating additional choices in neighborhood design, which expands housing choice and accommodates a variety of housing needs while guiding development to appropriate locations (of Policies 4.5 and 1.1).

Additional amendments included in the proposal generally clarify existing zoning provisions relating to Triplexes and mixed-use buildings, Day-Care Centers, fences and walls, swimming pools and driveway standards. In particular, allowing a permitted nonresidential use at street level with two dwelling units within the same building provides additional flexibility for small-scale mixed-use development where otherwise appropriate under the Zoning Ordinance.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Seitz", with a stylized flourish at the end.

Jill Seitz
Chief Community and Regional Planner

cc: Cathy Gorman, Township Manager