



CHRISTINA "TORI" MORGAN  
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Vice Chair

PHILLIPS ARMSTRONG  
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BECKY A. BRADLEY, AICP  
Executive Director

**COMPREHENSIVE PLANNING COMMITTEE MEETING**  
**Tuesday, February 24, 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 – Midway Manor Elementary School Modular Building (MGC)
2. ACTION ITEM: City of Bethlehem – Land Use of Regional Significance – Lehigh University East Hill Residence Hall (MGC)
3. ACTION ITEM: Palmer Township – Curative Amendment (JS)
4. ACTION ITEM: Bethlehem Township – Zoning Ordinance and Map Amendment (JW)
5. ACTION ITEM: Lower Saucon Township – Zoning Ordinance Amendment – Data Centers (MGC/JW)
6. ACTION ITEM: Palmer Township – Zoning Map Amendment (JW)
7. INFORMATION ITEM: Lehigh County Industrial Land Use Guide Training Updates
8. INFORMATION ITEM: March Committee Meeting will include Draft Housing Supply and Attainability Strategy Policies and Actions Discussion (JS)
9. INFORMATION ITEM: Commonwealth of Pennsylvania Housing Action Plan: 2026-2035 Released, February 12, 2026 (JS)
  - a. Access it here: <https://dced.pa.gov/housing-and-development/pennsylvania-housing-action-plan/>

**Next Comprehensive Planning Committee Meeting:**  
March 24, 2026, at 12:00 noon



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Executive Director

February 5, 2026

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

**Re: SSDLIA Modular Building – Midway Manor Elementary  
City of Allentown  
Lehigh County**

Dear Ms. Gomez,

The subject application is considered a Land Use of Regional Significance, as 'All' Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 137). 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). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below, and we encourage your participation.

<p><b>LVPC Comprehensive Planning Committee Meeting:</b></p> <p>February 24, 2026, at 12:00 PM (Virtual) <a href="https://lvpc.org/lvpc-meetings">https://lvpc.org/lvpc-meetings</a></p>	<p><b>LVPC Full Commission Meeting:</b></p> <p>February 26, 2026, at 7:00 PM (Virtual) <a href="https://lvpc.org/lvpc-meetings">https://lvpc.org/lvpc-meetings</a></p>
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The application proposes to demolish an existing 1,600 square foot, two-classroom modular building and an existing maintenance building. A new 9,856 square-foot, ten-classroom modular building will be constructed along with perimeter ADA ramps and driveway crossover reconstruction at 1103 N Tacoma Street (Parcel Identification Number 641830544726).

The project supports the goal of *FutureLV: The Regional Plan* to enhance economic growth by investing in improvements to educational facilities and 'increasing social and economic access to daily needs for all people' (of Policies 4.1 and 5.2).

The plan proposes to plant an additional 23 shade trees along the perimeter of the property, which 'improves access to green spaces', 'promotes street trees', and 'strengthens sidewalk infrastructure' (of Policy 5.3).

The LVPC recommends including a bicycle rack in the development plans. Including parking for bicycles supports a safe, healthy, inclusive and livable community (*FutureLV* Goal 5) and ensures transportation accessibility for all persons (of Policy 5.2).



*Approximate Building Location -- Google Aerial View of Site*

The LVPC encourages the developer to consider opportunities to incorporate sustainable energy systems that reduce overhead operational costs and ‘minimize environmental impacts of development’ (of Policy 3.1), such as geothermal energy systems, solar panels, and greywater reuse for irrigation and plumbing.

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,

Mary Grace Collins  
Community and Regional Planner

cc:

Allentown School District, Applicant; Barry Isett & Associates, Project Engineer/Surveyor; David Petrik, Deputy Director of Public Works; Jesse Sadiua, Chief Planner; Melissa Velez, Senior Planner; Brandon Jones, Planner



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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

February xx, 2026

Craig Peiffer, Assistant Planning Director  
City of Bethlehem  
10 E Church St  
Bethlehem, PA 18018

**Re: Lehigh University – East Hill Residence Hall  
City of Bethlehem  
Northampton County**

Dear Mr. Peiffer,

The subject application is considered a Land Use of Regional Significance, as 'All' Education Facilities are considered land uses of regional significance in *FutureLV: The Regional Plan* (page 137). 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). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below:

<p style="text-align: center;"><b>LVPC Comprehensive Planning Committee Meeting:</b></p> <p>February 24, 2026, at 12:00 PM (Virtual) <a href="https://lvpc.org/lvpc-meetings">https://lvpc.org/lvpc-meetings</a></p>	<p style="text-align: center;"><b>LVPC Full Commission Meeting:</b></p> <p>February 26, 2026, at 7:00 PM (Virtual) <a href="https://lvpc.org/lvpc-meetings">https://lvpc.org/lvpc-meetings</a></p>
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The application proposes the construction of a new residence hall on the Asa Packer Campus of Lehigh University that will contain 265 dwelling units to house first-year students. Additional features include a green roof for the building, new sidewalks, widening of existing sidewalks, intersection improvements at Sayre and University Drive, and the removal of existing street parking to convert a section of University Drive to two-way circulation.

Overall, the proposal supports the goal of *FutureLV: The Regional Plan* to 'expand access to education' and provide a variety of housing types that maximize social and economic opportunities (of Policies 4.1 and 4.5).



*Approximate Project Location via Google Aerial View*

## **Transportation**

The project includes a number of improvements that improve walkability, pedestrian safety, and traffic circulation. Road widening and sidewalks are proposed from the intersection of Sayre Drive and University Drive to the intersection of University Drive, Taylor Street, and Quad Drive. Crosswalks will also be constructed at each intersection, 'promoting safe and secure community design' (of Policy 5.1).

Existing parking spaces on University Drive and Dravo Drive will be removed to facilitate the expansion to accommodate two-way traffic. Removing parking, creating crosswalks, and adding sidewalks protects pedestrians when in road-user areas. The inclusion of bicycle racks and a sheltered bus station improves multimodal transit for students, 'integrating mixed-transportation into public space design' and 'ensuring transportation accessibility' for first year students who may not have a vehicle on campus (of Policy 5.2).

## **Environment**

In *FutureLV: The Regional Plan*, the LVPC identifies the project area as being within a Medium Priority Natural Resource Conservation Priority Area. These areas contain a mix of important natural features, such as woodlands, critical habitats, and steep slopes. The proposed tree plan provides a net increase to the amount of trees on the site, bringing the total number of trees over 8" from 102 to 118, promoting 'sustainable stewardship of natural lands' (of Policy 3.3). To complement these efforts, the LVPC recommends that the landscaping associated with the project use 'native, climate-adaptive and carbon-sequestering' species (of Policy 3.4).

The lot is situated on a steep slope of 15%-25%. The LVPC recommends that special erosion and storm drain controls be enforced to 'minimize environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).

The project site is located within the Catasauqua 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.

The inclusion of a green roof supports sustainable building and site design (of Policy 3.4). To further reduce overhead operational costs and ‘minimize environmental impacts of development’ (of Policy 3.2), the LVPC encourages the developer to consider opportunities to pursue sustainable building practices such as LEED certification, solar panels, and/or greywater reuse for irrigation and plumbing.

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,

A handwritten signature in black ink, appearing to read 'MGC', is positioned above the typed name.

Mary Grace Collins  
Community and Regional Planner

cc:  
Joe Klocek, Applicant;  
Thomas Serpico, Project Engineer/Surveyor  
Michael Alkhal, Township/Borough Engineer



**Lehigh Valley Planning Commission**

**CHRISTINA "TORI" MORGAN**  
Chair

**ARMANDO MORITZ-CHAPELLIQUEN**  
Vice Chair

**PHILLIPS ARMSTRONG**  
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February xx, 2026

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

**Re: Curative Amendment – Rezoning Rural Agriculture to North End Business  
Palmer Township  
Northampton County**

Dear Mr. Beavers:

The Lehigh Valley Planning Commission (LVPC) will consider the application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). The LVPC will send a revised follow-up letter after those meetings if the Commissioners have any additional comments. Participation in the meetings is encouraged, particularly at the Comprehensive Planning Committee meeting, where agenda items are discussed in detail. Meeting information is available at <https://lvpc.org/lvpc-meetings>. Both meetings will be virtual and held on:

- LVPC Comprehensive Planning Committee Meeting
  - February 24, 2026 at 12:00 PM
- LVPC Full Commission Meeting
  - February 26, 2026, at 7:00 PM

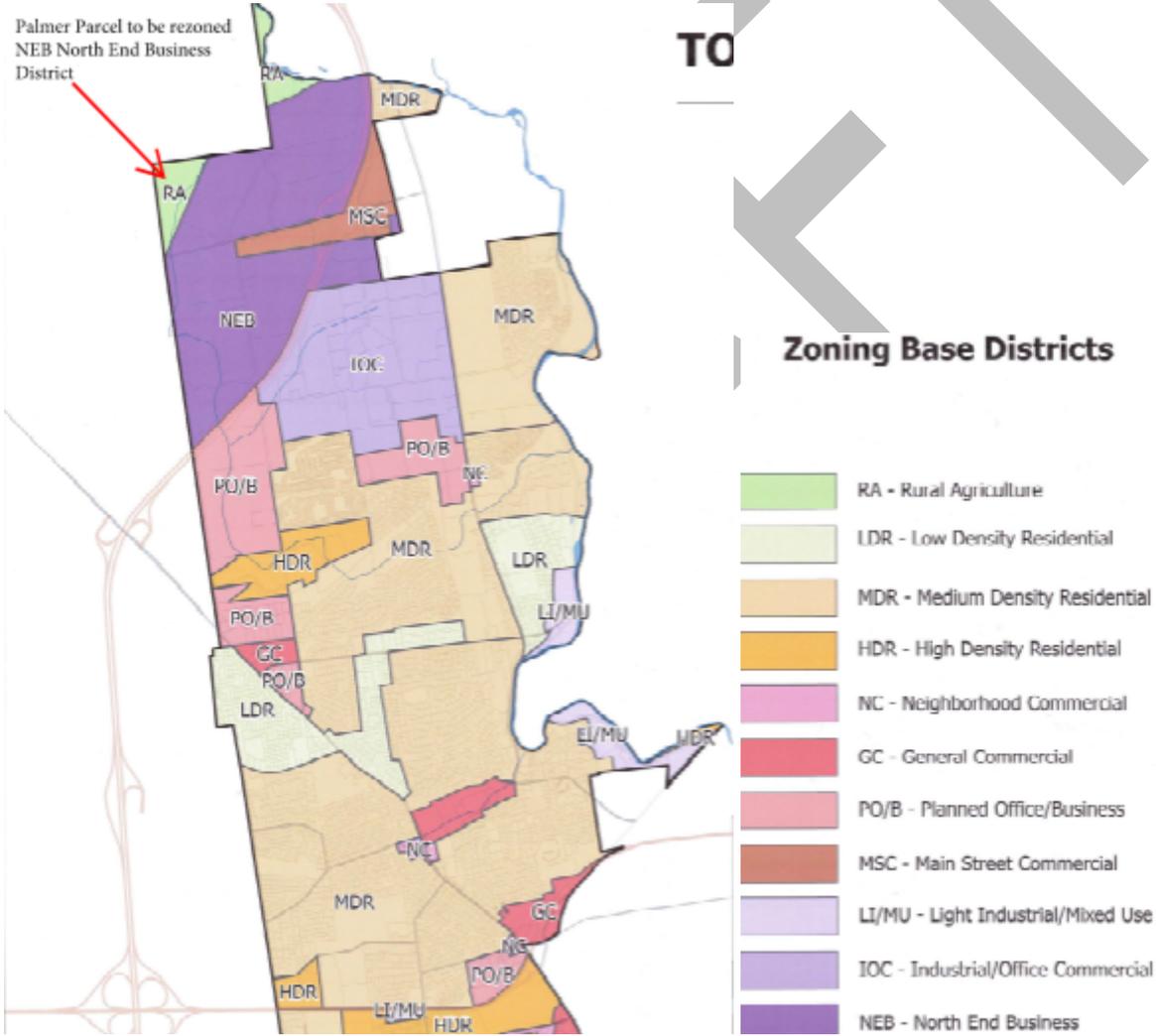
The Pennsylvania Municipalities Planning Code outlines procedures for landowners who desire to challenge, on substantive grounds, the validity of a zoning ordinance, map or any provision thereof which prohibits or restricts the use or development of land in which they have an interest (§609.1 and §916.1).

The Petitioner, The Charles Chrin Real Estate Trust, has submitted a challenge and a curative amendment to Palmer Township pursuant to §609.1 and §916.1 of the Pennsylvania Municipalities Planning Code, requesting that a parcel of land owned by the Petitioner be rezoned from Rural Agriculture (RA) to North End Business (NEB) so that the property may be developed for industrial uses.

The subject property is located on Main Street approximately 3/4 of a mile west of a Route 33 interchange, and is bisected by the Township line between Upper Nazareth Township and Palmer Township. According to the Northampton County Tax Parcel

Viewer, the portion of the property in Palmer Township is approximately 41.19 acres and the portion of the property in Upper Nazareth Township (Parcel ID J8 21 2A 0432) is approximately 50.68 acres.

Following updates to the Palmer Township and Upper Nazareth Township zoning ordinances and maps in recent years, the Petitioner alleges that the subject parcel has become reverse spot-zoned, where a specific parcel is subjected to a different zoning classification than the surrounding area. Palmer Township updated their zoning in 2023, and Upper Nazareth Township updated their zoning in 2025. The Petitioner seeks to amend the Palmer Township Zoning Map to rezone the subject parcel (J8 21 2A 0324) from the current zoning district of RA – Rural Agriculture District to NEB – North End Business District.



Palmer Township Zoning Map Provided by Petitioner to Indicate the Subject Property

The LVPC reviewed the challenge and amendments against the goals and policies of *FutureLV: The Regional Plan* and offers comments to the Township for consideration in the Curative Amendment Process:

### **Impacts of the Curative Amendment**

The proposed curative amendment would rezone the Palmer Parcel from RA – Rural Agriculture to NEB – North End Business District, enabling industrial development on the site. The MPC outlines five factors that the municipal governing body shall consider related to curative amendments (§609.1(c)). The LVPC reviewed the curative amendment against *FutureLV: The Regional Plan* and the factors outlined in the MPC:

*§609.1(c)(1) The impact of the proposal upon roads, sewer facilities, water supplies, schools and other public service facilities;*

The NEB Zoning District permits a variety of high-intensity industrial land uses by right, including beverage production, heavy manufacturing, medical marijuana grower/processor, outdoor industrial storage/supply yard, truck stop, truck, rail, freight terminal, and warehouse/logistics use.

The subject property is located adjacent to an industrial corridor. Industrial development has been constructed and proposed along the 3/4-of-a-mile stretch of Main Street between the subject property and a Route 33 interchange to the west. To the east, this road becomes Tatamy Road, connecting to a residential neighborhood and traveling through Nazareth Borough.

Existing public sewer and water utilities are available to the site, and in principle, concentrating industrial development in locations with existing infrastructure supports matching development intensity to sustainable infrastructure capacity (of Policy 1.1). However, the property boundary (along the Township border) is 500 feet away from Nazareth Area Intermediate School athletic fields to the west, 1,000 feet away from the school building, and 1,500 feet away from the residential development. Given the scale and intensity of industrial uses permitted in the NEB District, rezoning the property to NEB is likely to have a detrimental impact on nearby school and neighborhood and does not support increasing the social, economic and environmental well-being of the region (of Policy 1.1).

The current RA Zoning District designation for the site permits a range of community-supportive commercial and recreational land uses that can better serve as a transitional buffer between the existing industrial development to the east and existing school and neighborhoods to the west.



Google Aerial Imagery

*§609.1(c)(2) If the proposal is for a residential use, the impact of the proposal upon regional housing needs and the effectiveness of the proposal in providing housing units of a type actually available to and affordable by classes of persons otherwise unlawfully excluded by the challenged provisions of the ordinance or map;*

As the proposed curative amendment facilitates non-residential industrial development, this factor is not applicable.

*§609.1(c)(3) The suitability of the site for the intensity of use proposed by the site's soils, slopes, woodlands, wetlands, flood plains, aquifers, natural resources and other natural features;*

The subject property contains a portion of the Schoeneck Creek and numerous identified medium- and high-preservation-priority natural resources, including riparian buffers, wetlands, floodplains, and Natural Heritage Inventory Supporting Landscapes. The presence of these features substantially limit the developable area of the subject property, and the intensity of uses permitted in the NEB district are unsuitable for 'protecting high-priority natural lands and water resources' (of Policy 3.1) and 'minimizing environmental impacts of development' (of Policy 3.2).



LVPC GIS Mapping

*§609.1(c)(4) The impact of the proposed use on the site's soils, slopes, woodlands, wetlands, flood plains, natural resources and natural features, the degree to which these are protected or destroyed, the tolerance of the resources to development and any adverse environmental impacts;*

Industrial development introduces higher impervious coverage, stormwater runoff, and impacts to adjacent waterways. The LVPC encourages Palmer Township to ensure that riparian buffers, stormwater management standards, and environmental performance criteria are sufficiently robust to protect Schoeneck Creek and downstream resources (of Policy 3.1).

*§609.1(c)(5) The impact of the proposal on the preservation of agriculture and other land uses which are essential to public health and welfare.*

The subject property and adjacent portion of the lot in Upper Nazareth Township owned by the Petitioner are currently used for agriculture. These lots are the only agricultural use in the immediate vicinity, and are surrounded by development. Although this site is not contiguous to farmland opportunities to lease farmland are becoming more difficult for farmers to find across the region and should be retained where possible (of Policy 3.3).

The subject property is located within an area identified for Development in the General Land Use Plan of *FutureLV: The Regional Plan*, and the area contains existing development and infrastructure able to support additional development. However, additional development must align with the context of existing land uses in the vicinity. The proposed curative amendment, if enacted, would create potential land use conflicts that would have substantial quality of life impacts on the nearby residences and educational facility uses as well as adverse impacts on the existing environmental features on the site, and is therefore not recommended for adoption.

## The Substance of the Challenge

In addition to the evaluation of curative amendment impacts outlined above, the LVPC evaluated the substance of the challenge (per MPC §916.1) and finds that the reasoning of the curative amendment does not appear to have merit.

The Petitioner argues that “due to the location of the Palmer Parcel in the northern end of the Township; the industrial character of the surrounding area; the proximity of the Property to the Route 33 corridor; the existing transportation infrastructure; and the accessible connections to both public water and public sewer services, the Palmer Parcel is appropriate for zoning within the NEB District”.

While these features are present and support industrial development, referring to “the industrial character of the area” is only accurate to describe the area east of the subject property, and the Petition fails to acknowledge the residential and educational land uses to the west. The LVPC disagrees that the subject property is appropriate for zoning within the NEB District due to these land use conflicts and the presence of environmentally sensitive features on the site.

The Petitioner alleges that a reverse spot zoning has occurred on the subject property, effectively creating an ‘island’ sited for agricultural uses while all surrounding parcels permit industrial development. The Petitioner argues there is no justifiable purpose for differential treatment of this parcel.

Despite the naming of the RA – Rural Agricultural Zoning District applied to the subject property, the RA District permits a range uses other than agricultural uses by right, with several others permitted by special exception and conditional use. Given these allowable uses, the LVPC disagrees that the zoning has created an island of agricultural uses. Due to the nearby sensitive receptors (residential neighborhood and school) and natural features present on the site, the LVPC also disagrees that there is no justifiable purpose for differential treatment of this parcel, and that the permitted uses provide more appropriate compatibility with the sensitive receptors.

Municipalities, when considering Curative 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.



Jillian Seitz  
Chief Community and Regional Planner

cc: Lisa Klem, Upper Nazareth Township Manager; Marc B. Kaplin, Esquire, Kaplin Stewart Law



CHRISTINA "TORI" MORGAN  
Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Vice Chair

PHILLIPS ARMSTRONG  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

February X, 2025

Mr. Anthony Giovannini, Jr.  
Bethlehem Township  
4225 Easton Avenue  
Bethlehem, PA 18020

**Re: Zoning Ordinance Amendment  
Bethlehem Township  
Northampton County**

Dear Mr. Giovannini:

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
  - February 24, 2025 at 12:00 PM
  - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
  - February 26, 2025 at 7:00 PM
  - <https://lvpc.org/lvpc-meetings>

The application proposes a text amendment to update the definitions and additional standards for convenience stores to incorporate fueling and electric vehicle charging stations, define and implement regulations for electric vehicle charging stations, and update additional standards for drive-through service and auto service stations.

The application proposes permitting electrical vehicle charging stations (EVCS) as a permitted accessory use throughout Bethlehem Township. The proposal adds related definitions, including three types of EVCS based on voltage charging levels: Level 1 is considered slow charging (up to 120 volts), Level 2 is medium charging (voltage up to

240) and Level 3 is fast or rapid charging, with voltage greater than 240. Level 1 and Level 2 are ideal for residences where a vehicle may be parked and charging for several hours. Level 2 can also be public charging at workplaces, hotels and shopping centers. Level 3 charges vehicles in about 30 minutes and is intended for quick stops along a long-distance trip. The LVPC commends the Township for defining EVCS based on charging level standards promoted by the U.S. Department of Energy ([https://afdc.energy.gov/fuels/electricity\\_infrastructure.html](https://afdc.energy.gov/fuels/electricity_infrastructure.html)).

Since the emergence of electric vehicles, they have become commonplace on the road and are becoming increasingly prevalent each year. Vehicle registration data provided by the Pennsylvania Department of Transportation (PennDOT) indicates that from 2020-2024 the combined registrations of all-electric and hybrid vehicles have increased by 97% in Lehigh County and 77% in Northampton County, and all-electric vehicle registrations have increased by more than seven times in that period across the commonwealth. More vehicle manufacturers are releasing electric-powered models, and the demand for supporting infrastructure is growing rapidly. *FutureLV: The Regional Plan* identifies energy diversification as a Future Force, stating that ‘Municipal governments will need to develop new zoning, development categories and amend comprehensive plans and official maps to adapt to a new energy future’ (page 49: Future Forces – Energy Diversification).

The application proposes amending the additional requirements for specific principal uses for Auto Service Stations and Convenience Stores. The LVPC recommends clarifying the differences between these uses and the Auto Repair Garage use in § 275-24. Section 275-189 10(a), additional requirements for Auto Service Stations, refers to the definition of an Auto Repair Garage. The primary distinction is the allowed intensity of work; limiting the types of mechanical work at Auto Service Stations would provide clarity while allowing Auto Repair Garages to perform all types of mechanical work.

Several additional requirements in § 275-189 10 require Auto Service Stations to occupy more land than necessary. Subsections 10(h), 10(i), and 10(j) require a minimum lot size of two acres, 300 feet of frontage on an arterial road, and setbacks of 300 feet from sensitive uses and 100 feet from residential uses. Auto Service Stations are permitted only in the General Commercial, Planned Commercial, and Light Industrial districts. The General Commercial and Planned Commercial districts have lower minimum lot sizes, frontages, and setbacks while allowing more impactful uses, including Auto Repair Garages. The LVPC recommends considering reducing these requirements to align with the permitted districts and “encourage an efficient development process” (of Policy 1.4).

Impacts could instead be mitigated through form-based standards similar to those for Auto Repair Garages, including § 275-189 A1(8)b (minimizing noise, odor, vibration, light, and electrical interference), § 275-189 A1(8)c (limiting outdoor vehicle storage in

front yards and requiring side setbacks), and § 275-189 A1(8)f (orienting service bay doors away from residential and other uses to avoid noise and light leakage). This approach would better align with the *FutureLV* goal of promoting “context-specific design solutions” (of Policy 5.4).

These form considerations also apply to Convenience Stores which, under proposed § 275-189 76(d), must meet Auto Service Station requirements when they include an accessory fueling use. The LVPC recommends clarifying the distinction between an Auto Service Station, which may sell groceries and food, and a Convenience Store with accessory fueling, which is subject to additional regulations. Section 275-189 76(e) also requires such Convenience Stores to meet the off-street parking requirements of both uses. Because Convenience Store parking requirements already matches other large-scale retail uses and requires a minimum of eight spaces, combining the standards will likely create excess parking and impervious surface and limiting impervious surface aligns with *FutureLV: The Regional Plan* Policy 3.2’s to “minimize environmental impacts of development.” Additionally, disincentivizing current convenience store’s from implementing fueling, which includes EV charging, would limit their ability to “incorporate environmentally sensitive transportation technologies” (of Policy 3.4).

The application also proposes establishing additional standards for accessory uses for Electric Vehicle Charging Stations (EVCS). The LVPC commends subsection d, which requires at least one Americans with Disabilities Act-compliant accessible charging space to “ensure transportation accessibility for all persons” (of Policy 5.2).

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

Sincerely,



Jacob Weinberg  
Community and Regional Planner

Cc:

Doug Bruce, Township Manager;  
Samantha Smith, Planning Director;  
Laura Zapata, Township Secretary



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Treasurer

**BECKY A. BRADLEY, AICP**  
Executive Director

February xx, 2026

Jay Finnegan, Acting Manager  
Lower Saucon Township  
3700 Old Philadelphia Pike  
Bethlehem, PA 18015

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

Dear Mr. Finnegan,

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). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below:

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The proposal amends the Lower Saucon Township Zoning Ordinance by adding Data Centers as a conditional use within the Light Manufacturing (LM) District.

Data Centers are essential components of modern technological infrastructure, enabling everyday devices to send and receive digital data needed for video streaming, online shopping, cloud storage, and communicate with other devices. With the growth of digital device and technology usage, hyperscale data centers have been expanding across Pennsylvania and are an emerging land use in the Lehigh Valley. When sited appropriately and connected to adequate infrastructure capacity, data centers can support the continuation of the region’s technological evolution, economic base and resilience (of Policy 4.1). The Township’s proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

The following aspects of the proposed ordinance align with *FutureLV: The Regional Plan* and best practices for regulating data centers:

- **Conditional Use:** Permitting data centers as a conditional use allows the Township to evaluate project impacts on a case-by-case basis to determine community needs and sensitivities and balance those needs with the demand for modern technological infrastructure. This approach supports an efficient development process that is responsive to regional needs and minimizes the impacts of regionally significant land uses (of Policy 1.4).
- **Emergency Planning:** The provision requiring an Emergency Response Plan aligns with *FutureLV* by enhancing planning and emergency response capabilities (of Policy 5.1). The LVPC encourages continued coordination between the applicant, Township and local emergency service providers to ensure adequate site design that supports preparedness and response capabilities.
- **Parking:** Because data centers typically have fewer employees than other types of industrial uses, applying parking minimum standards that are typical of other types of industrial uses may lead to overbuilt, unused impervious surfaces that exacerbate stormwater impacts. The proposed parking requirement of one space per on-site employee supports best-practice contextual standards that match development intensity with appropriate infrastructure capacity (of Policy 1.1) and reduce impervious surfaces and protect water sources (of Policy 3.3).
- **Aesthetics:** The aesthetic standards included in the ordinance help to minimize the visual impacts of the scale of buildings on neighboring properties and ‘promote context-specific design solutions’ (of Policy 5.4).
- **Sustainable Infrastructure/Building Design:** The ordinance encourages LEED certification and roof-mounted solar energy systems for Data Center buildings, which supports ‘sustainable building, site design and community design practices’ (of Policy 3.4).

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

- **Definitions:** The LVPC suggests amending the definition of “Data Center Equipment”. In the current proposed ordinance, Data Center Equipment (DCE) is defined in relation to the noise that it generates. To support clarity, this definition should focus on the function of Data Center Equipment in order to better identify what structures or machines fall into this classification (of Policy 1.4). Additionally, this definition names DCE as accessory to “Data Storage Center”, which should be amended to “Data Center” both here and throughout the ordinance to ensure consistency. Section 180-128 mentions Sensitive Receptors and includes a definition, which should be located in the definitions section instead.

- **Setbacks:** The LVPC recommends that setbacks be increased to from 200 feet to 500 feet, especially where the data center borders any residential use, sensitive receptor, or public roadway to minimize noise and visual impacts on adjacent property owners (of Policy 3.2).
- **Landscaping and Screening/Fencing:** To promote clarity and efficiency in the land development process (of Policy 1.4), the Township should ensure that fencing requirements are consistent, clarify the width of buffer-yards versus landscape buffers and differentiate between them concerning the permissible plant species in Section 180-128D(1) and 180-128D(2). Encouraging the use of 'native, climate-adaptive and carbon sequestering' species is a best practice (of Policy 3.4).
- **Noise:** The proposed ordinance limits the sound generated by a Data Center and any Data Center Accessory Use to a maximum daytime decibel level of 67 dB(A) and a maximum nighttime and weekend decibel level of 57 dB(A). When proper noise abatement measures are taken by the developer (such as installing sound attenuation walls), noise level at the property line can be significantly reduced. Data Centers are operational 24/7, so noise levels are unlikely to change throughout the day unlike other kinds of industrial uses. The LVPC recommends that the Township consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential uses or other Sensitive Receptors (of Policy 3.2).
- **Power Supply:** The ordinance requires that documentation be submitted of agreement with utility providers to serve potential data centers and that the necessary capacity is available, with the details of any known impacts on rates or availability for other users. In addition to these requirements, documentation of the projected annual electricity demand and supply source(s) should be provided. The Township should also require applicants to document efforts made to maximize the use of renewable and/or clean energy for their electrical and cooling needs, either through on-site generation or verifiable power purchase agreements. These efforts 'reduce greenhouse gas emissions' and 'promote energy conservation' (of Policy 3.4).
  - **Back Up Power:** The ordinance should specify that any backup power equipment minimize air pollutant emissions in accordance with EPA Tier 4 emissions standards and require annual testing to minimize air quality impacts (of Policy 3.2). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety.
  - **On-site Energy Generation:** The LVPC recommends including provisions for on-site power generation uses such as fuel-cell power stations,

geothermal, and solar photovoltaics. These are viable alternative and supplemental energy options for technology-based land uses which are highly energy-consuming. By regulating on-site energy generation, the Township can further 'integrate efficiency measures and emerging technologies', 'improve the utility and mobility infrastructure of the region' (of Policy 1.1), and 'minimize and mitigate the impacts of utility expansion associated with technological advancements' (of Policy 3.2).

- **Cooling:** As part of the conditional use approvals process, the applicant should specify the type of cooling method proposed, whether predominantly water-cooled or air-cooled, to 'encourage an efficient development process' (of Policy 1.4). Changes to the proposed cooling method after approval is granted will alter the required water/sewer and power requirements and change the required utility infrastructure to support it.
- **Water Supply:** The ordinance requires a Water Resources Impact Report be submitted that identifies the source of water to be used and whether an adequate supply is available or, a user agreement from a public water source and a demonstration of adequate means of wastewater disposal that includes all necessary approvals. The LVPC recommends that this report also include modeling of water use at peak-stress conditions to ensure year-round feasibility as well as proof of review and approval from the Delaware River Basin Commission (DRBC) where applicable. The additional oversight of a Water Resources Impact Report supports the 'protection of the quality and quantity of surface water and groundwater' (of Policy 3.2).
- **Environmental Impact Study:** The Environmental Impact Study requires demonstration of impact to other nearby projects and proposals, and probable future impacts of the proposal, focused on the 'elements of the environment most likely to be affected as well as potential regional effects and ecological interrelationships', and a 'detailed examination of public resources most likely impacted by the development'. This report shall also 'identify mitigation measures which may be undertaken to offset any degradation, diminution, or depletion of public natural resources'. The LVPC recommends including carbonate geology as one of the critical impact areas to be identified in the Environmental Impact Study to attempt to 'discourage development in hazard-prone areas' (of Policy 3.2).

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

Sincerely,

A handwritten signature in black ink, appearing to read 'MGC', written in a cursive style.

Mary Grace Collins  
Community and Regional Planner



DR. CHRISTOPHER R. AMATO  
Chair

CHRISTINA V. MORGAN  
Vice Chair

ARMANDO MORITZ-CHAPELLIQUEN  
Treasurer

BECKY A. BRADLEY, AICP  
Executive Director

February X, 2025

Mr. Craig Beavers  
Palmer Township  
3 Weller Place  
Palmer, PA 18045

**Re: Zoning Map Amendment  
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:

- LVPC Comprehensive Planning Committee Meeting
  - February 24, 2025 at 12:00 PM
  - <https://lvpc.org/lvpc-meetings>
- LVPC Full Commission Meeting
  - February 26, 2025 at 7:00 PM
  - <https://lvpc.org/lvpc-meetings>

The application proposes modifying the Palmer Township Zoning Ordinance to change the zoning from High Density Residential (HDR) to Planned Office/Business (PO/B) at parcel K8-10A5A-5 to build a five-story group care facility on the parcel.

The proposed rezoning aligns with *FutureLV: The Regional Plan* in several ways. The change would reduce required off-street parking, as high-density residential parking requirements are generally higher than those for a group care facility. While the applicant compared the use to a private school, which would require more parking, even a large-scale single-family residential development with lower parking requirements

would require internal roads and driveways that increase impervious surface, one of the primary environmental impacts associated with parking. Less intensive uses could underutilize the site and limit the benefits of the proposal. Traffic impacts are also expected to be lower than under high-density residential alternatives, in part because the group care facility would generate fewer drivers. Together, reduced parking and traffic would help “minimize the environmental impacts of development” (of Policy 3.2).

A primary benefit of the proposal is the inclusion of group care facilities, specifically senior care. According to the Lehigh Valley Housing Dashboard, Palmer Township is experiencing a shortage of 269 units today and an additional 2,688 units to keep up with the Townships anticipated population growth. The proposal helps meet the Borough’s housing demand while increasing attainable housing opportunities (of Policy 4.5). Additionally, the proposed senior housing helps with the Lehigh Valley’s changing demographics where 21.6% of the region’s population, or 169,564 people, will be over the age of 65 by 2050 (Page 44: Future Forces – Changing Demographics).

However, the project is also located in a floodplain mapped by the Federal Emergency Management Administration (FEMA). The LVPC recommends constructing the ground floors above the elevation of identified floodplains to reduce the risk of property damage and support long-term community resilience. Because group care residents may require medical support, flood impacts could be more severe than for typical residential uses, making mitigation especially important. Although the current proposal avoids the mapped 100-year floodplain, adjacent areas remain at elevated risk and could require residents to seek comparable accommodations on short notice in a flood event. This approach would improve alignment with FutureLV by “minimizing environmental impacts of development to protect the region’s critical natural resources” and “reducing potential impacts of hazards to promote community resiliency” (of Policies 3.2 & 5.1).

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

Sincerely,



Jacob Weinberg  
Community and Regional Planner