



City of Allentown Staff Report

To: Allentown City Planning Commission
From: Bureau of Planning & Zoning
Melissa Velez, Senior Planner
Subject: Bill 52-2026 Zoning Ordinance Amendment RE: Data Center
Meeting Date: July 14, 2026

Background

Bill 52-2026 is a proposed amendment to the Zoning Ordinance initiated by City Council in order to amend regulations recently adopted for the data center use through Bill 20. A copy of Bill 52 is attached hereto as Exhibit A and a copy of Bill 20 is attached hereto as Exhibit B. During the adoption process for Bill 20 a great deal of public comment was received: in person at various public meetings, by email, and numerous phone calls. City Council voted to adopt Bill 20 so that the city would have some data center regulations in place. They agreed they would immediately propose amendments incorporating their highest priority revisions. Additional amendments may also be proposed at a later date utilizing public feedback given through this review process.

Proposed Amendments

Bill 52 reflects City Council's highest priority Data Center amendments, including the following:

1. Amends Table 660-4 Use Table to change the Data Center Use from Special Exception to Prohibited in the IG, Industrial General, zone.
2. Adds a public notice requirement to section 660-38 Manufacturing & Industry Group for certain uses. This would require applicants to have an informal public meeting prior to either a Zoning Hearing Board meeting, Planning Commission meeting, or the submittal of a Zoning Permit Application, based on which scenario would apply, and to maintain a project website.
3. Changes the setback from certain uses and zones from 200 ft to 500 ft.
4. Adds regulations for noise and vibration, such as full spectrum sound studies, documenting baseline ambient noise levels, assessing persistent tonal sounds and other low frequency noise, specifications relating to the third-party acoustical consultant, and violations.
5. Adds regulations for decommissioning, including submission of a Decommissioning and Site Restoration Plan, timeline, and financial security.

On June 23, 2026, the draft amendment, Bill 52, was introduced to City Council and then reviewed at the immediately following CED Committee meeting. The amendment was

forwarded by the City Clerk to the Allentown City Planning Commission and Lehigh Valley Planning Commission for review and comment. A copy of the letter is attached hereto as Exhibit C.

Comments relating to the proposed amendment have been received by the Allentown Environmental Advisory Council and Lehigh Valley Planning Commission and are attached hereto as Exhibits D and E, respectively.

With the proposed changes to the permitted zones and setbacks, staff notes that there must be properties available for this use. A mapping exercise has demonstrate there are still some properties that can accommodate data center uses greater than 50,000 sq ft in the IM zone with the 500 ft setback.

As required by the MPC, Bill 52 is being presented to the Planning Commission to give the Commission an opportunity to submit recommendations to City Council ahead of the public hearing.

Exhibit A

ORDINANCE NO.

FILE OF CITY COUNCIL

BILL NO. 52 - 2026

JUNE 23, 2026

AN ORDINANCE

Amending Part II General Legislation, Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table and Section 660-38 Manufacturing & Industry Group, adding public notice requirements and amending the use category Data Center Use.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF ALLENTOWN:

Chapter 660 Zoning

[Adopted by the City Council of the City of Allentown 10-15-2025 by Ord. No. 16166 (Part 13, Title 1, of the 1962 Codified Ordinances). Amendments noted where applicable.]

SECTION ONE: That Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table, be amended as follows on Exhibit A, Table 660-4 Use Table.

SECTION TWO: That Chapter 660 Zoning, Article 5 Uses, Section 660-38 Manufacturing & Industry Group, be amended as follows:

§ 660-38 Manufacturing & Industry Group

The manufacturing and Industry use group includes establishments involved in manufacturing, processing, fabrication, packaging, or assembly of goods or the servicing of industrial or commercial machinery, equipment, products or by-products. Uses in this group may include offices and ancillary retail sales as accessory uses.

(1) Public Notice. Prior to the establishment of any new principal use in any of the following categories: High-Impact Industry, Recycling Use, and Data Center Use (greater than 50,000 sq ft), the following public notice requirements must be met:

- (a)** The applicant shall hold a public meeting prior to the first Zoning Hearing Board meeting where a special exception and/or variance is discussed or prior to the first Allentown City Planning Commission meeting when the proposed land development is discussed. In cases where only a Zoning Permit is required (and no special exception or variance is required), the meeting must occur two weeks prior to submittal. The purpose of the meeting shall be to inform the public about the nature of the proposed development, including the location, scale, and general characteristics. A representative(s) of the applicant with knowledge of the project and the ability to answer general questions from the public about the project's general locations, scale, and parameters shall participate in the meeting. The public meeting shall be advertised consistent with "public notice" as defined by

the Pennsylvania Municipalities Planning Code (PA Act 247).

- (b) The applicant shall create and maintain a project website for viewing by the general public. The site shall explain the project parameters, including maps, elevations/renderings, anticipated electrical use, and noise levels, beginning at least two weeks prior to the meeting(s) discussed above, and until the time of final land development approval. The site shall provide a description of the proposed use, construction timelines and phasing plans, dates of public meetings with municipal bodies, and status of permits.

...

660-38.H DATA CENTER USE

- (1) **Use Category Description.** The data center use category includes a building, buildings, or structures which are occupied primarily by computers and/or telecommunications and related equipment where digital information is processed, transferred and/or stored, primarily to and from offsite locations. This use does not include computers or telecommunications related equipment that is secondary and customarily incidental to an otherwise permitted use on the property, such as servers associated with an office building. This use shall also include cryptocurrency mining, blockchain transaction processing, and server farms. The Data Center Use shall include data center as a principal or accessory use and data center accessory uses (see 660-135).
- (2) **Supplemental Use Regulations.** Data center uses are subject to the following supplemental use regulations:
- (a) No new data center use or accessory data center use may be located within:
 - [1] 75 feet of the right-of-way of a public street;
 - [2]-200 ~~500~~ feet of the lot line of any:
 - [i] Use within the Residential use group;
 - [ii] Use within the Civic & Institutional use group (except Cemetery, Governmental Use, Transportation Facilities or Infrastructure & Utilities);
 - [iii] Child Care use category; or
 - [iv] Any MX-N-, GX-N-, or N-zoned lot.
 - [3] 50 feet of any other lot line.
 - (b) Data center uses with more than 50,000 square feet of indoor gross floor area require a minimum lot area of ~~5 acres in the IG zone and 8 acres in the IM zone.~~
 - (c) A landscaped buffer, including shade trees, evergreen trees, and planting beds, with a minimum width of 25 feet must be provided around the perimeter of the use, except for necessary perpendicular crossings. Rows of shade trees and evergreen trees are to be staggered to create a dense buffer with planting beds at the exterior rows. See 660-78.F for distance and size requirements for plantings in each row. Native plants are encouraged to the maximum extent possible. The Allentown Shade Tree Commission (ASTC) may provide comments on specific plantings.
 - (d) The zoning hearing board is expressly authorized to require berms, landscaping, fencing and additional setbacks as needed to protect the public health and safety and to avoid conflicts with neighboring uses.
 - (e) The applicant shall submit a narrative description of the nature of the proposed onsite activities and operations, anticipated hours of operation, anticipated frequencies and types of vehicle trips generated, and anticipated types of materials/equipment stored on site. Information obtained from any required Transportation Impact Statements/Analyses may be summarized here.

(f) Environmental Impact.

[1] The applicant shall submit an evaluation of possible environmental impacts, and where necessary, propose mitigation strategies. The assessment must be prepared by a qualified professional, and consider both normal/ typical conditions and adverse conditions (i.e. drought, extended power outages, extreme heat, etc.) relevant to the following:

- [i] Air quality;
- [ii] Surrounding soil quality;
- [iii] Surrounding water quality;
- [iv] Groundwater sources;
- [v] Wildlife and wildlife habitat; and
- [vi] Greenhouse gas emissions.

(g) Noise and Vibration.

[1] A full spectrum (dBA + dBC) pre and post-construction (or pre and post-conversion, as applicable) sound study shall be produced by a licensed-qualified third-party acoustical consultant professional engineer specializing in acoustics or an engineer Board Certified by the Institute of Noise Control Engineers to demonstrate that the data center and data center accessory uses, will conform with the requirements of Chapter 400, Noise and other requirements found in this ordinance. ~~Sound study should also assess any persistent tonal sounds (hums) or other consistent low frequency or ambient noise.~~ The sound study must:

- [i] Document pre-existing baseline ambient noise level at the time of an initial data center plan submittal, using full spectrum modeling to address low frequency sounds.
- [ii] The study must measure daytime and nighttime noise, as well as worst-case scenario operation, which shall include full build-out operation of all mechanical equipment, including but not limited to generators, cooling systems, transformers and electrical infrastructure.
- [iii] The sound study must also assess any persistent tonal sounds (hums) or other consistent low-frequency or ambient noise including but not limited to generators, cooling systems, transformers and electrical infrastructure, and vehicular operations.
- [iv] The sound study must include a vibration study prepared by a qualified professional shall be provided that demonstrates that no vibration from the data center and data center accessory uses will be perceptible to the human sense of feeling beyond the property line.
- [iv] The sound study must indicate sound levels of any generator use during emergency and/or testing periods.

[2] ~~The licensed professional third-party acoustical consultant~~ must state whether noise mitigation measures are recommended by noise study and, if so, identify the applicable mitigation measures.

[3] The third-party acoustical consultant shall meet the following:

- [i] The acoustical consultant shall have no financial interest in the project other than payment for the preparation of the sound study.
- [ii] The acoustical consultant shall demonstrate:
 - a. Relevant experience in environmental noise

analysis;

- b. Appropriate education or professional credentials such as professional licensed engineer specializing in acoustics or an engineer Board Certified by the Institute of Noise Control Engineers.
- c. Prior completion of comparable sound studies.

[iii] The City reserves the right to review and approve the qualifications of the acoustical consultant and may require the selection of an alternative consultant if independence or qualifications are deemed insufficient.

[4] Prior to the issuance of a Certificate of Occupancy, the applicant shall submit an as-built sound study prepared by a qualified third-party acoustical consultant demonstrating compliance with all applicable sound standards, including both A-weighted (dBA) and C-weighted (dBC) limits, where applicable. An as-built sound study shall also be conducted six months after issuance of the Certificate of Occupancy for any data center and data center accessory uses and upon request by the City thereafter to ensure continuous compliance with the requirements of Chapter 400, Noise, and consistent with the representations and/or mitigation strategies described in the sound study.

[5] A vibration study prepared by a qualified professional shall be provided that demonstrates that no vibration from the data center and data center accessory uses will be perceptible to the human sense of feeling beyond the property line.

[6] If it is determined by the as-built sound study that there is a violation of Chapter 400, Noise, and/or if the conditions are not consistent with the representations and/or mitigation strategies described in the sound study, it shall be considered a violation of this ordinance and the conditions of approval, and the zoning officer is authorized to cancel, revoke, withhold or suspend a permit issued under the provisions of this zoning ordinance, as described in 660-123.C. Revocation of Permits.

(h) Water and Sewer.

[1] A Water Utilization Report shall be submitted detailing, at a minimum the total daily intake volume and source(s) of that water, discharge volumes and destinations, cooling system type and efficiency, and shall demonstrate compliance with the city's stormwater ordinances and regulations. The Report shall be prepared and certified by a professional engineer. The Report shall be subject to review and comment by the City. The City shall have the right to require supplemental or amended reports based upon comments by the City prior to any zoning approval.

[2] The applicant shall submit documentation from the Lehigh County Authority (LCA) certifying that the Authority will supply the water needed for the use. If the LCA or the City identify a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the infrastructure upgrades and/or system improvements necessary to supply the facility.

[3] If the use uses nonpublic water sources, the applicant shall provide a water feasibility study to determine if there is an adequate supply of water for the use and to estimate the impact on existing wells, groundwater, and surface water in the vicinity. The study shall be

reviewed and approved by the Delaware River Basin Commission, LCA and PA Department of Environmental Protection (PA DEP) for water withdrawals from groundwater or streams, where applicable.

[5] The applicant shall demonstrate adequate means of wastewater disposal have been provided and approved by the PA DEP. Discharge of water used as a direct or indirect cooling medium for equipment is not an authorized non-stormwater discharge into the Municipal Separate Storm Sewer System (MS4) per the City's MS4 NPDES permit.

(i) Power Supply.

[1] The applicant shall identify the portion of its energy use that will be met through on-site renewable energy generation. Data centers are encouraged to make good faith efforts to maximize use of renewable and/or clean energy for electrical and cooling needs, either through on-site generation or verifiable power purchase agreements (PPAs).

[2] An Energy Management Plan shall be submitted detailing at a minimum, annual electricity demand, the supply sources to be utilized, energy storage capacity (if applicable) and efforts made to maximize energy efficiency and use of renewable or clean energy. The plan shall be prepared and certified by a professional engineer.

[3] If the applicant proposes to connect the use to the electric grid, the applicant shall provide documentation from the applicable electric service provider certifying the necessary capacity is available and the provider will serve the use. An assessment identifying any impacts on electric rates or availability for other uses directly attributable to the use shall be provided to the City.

[4] If the assessment identifies a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the system improvements necessary to mitigate any limits or system improvements necessary.

[5] If the necessary system improvements are determined by the City Engineer and the respective public utility provider to be infeasible, then on-site utility methods may be considered in compliance with all City ordinances.

(j) Electronic Waste and Decommissioning:

[1] An Electronic Waste Plan shall be submitted outlining procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products, which will apply in cases when the data center is updated or decommissioned.

[2] A Decommissioning and Site Restoration Plan shall be submitted. Upon cessation of operation of the data center use and/or data center accessory use for a period of at least 12 months, except where the city agrees to allow the owner or operator additional time due to their intent to re-continue such use in the near future, the owner or operator of the use shall ensure the following standards are met:

[i] All generators, tanks, battery systems, electrical infrastructure, accessory structures, and related improvements associated with such use shall be removed from the subject property.

[ii] Hazardous materials, including batteries, fuel or refrigerants shall be disposed of in compliance with state and federal law.

[iii] Disturbed soils shall be stabilized and re-vegetated.

[iv] Any utility connections shall be safely disconnected and capped.

[v] The site shall be restored to a condition compatible with surrounding land uses or consistent with the most restrictive adjacent zoning district.

[3] Said removal activities shall commence within one year of the conclusion of the 12-month period referenced above and shall be completed no later than three years following the commencement of the removal activities.

[4] To ensure removal as described, the applicant shall provide a decommissioning and site restoration bond or letter of credit in the form acceptable to the city and naming the city as a beneficiary sufficient to remove all generators, fuel tanks, battery systems, electrical infrastructures, and related improvements and to restore the site for future reuse.

[5] If the owner or operator fails to comply with this section, the city may utilize such financial security to perform or cause the performance of the removal of all generators, fuel tanks, battery systems, electrical infrastructure and related improvements associated with the abandoned use. Such financial security shall be maintained until the completion of the removal activities described herein, and may be reviewed periodically by the city to ensure that the amount of security remains adequate to secure removal. The financial security must be in the amount equal to 100% of the total estimated cost of decommission and restoration. The financial security must be posted prior to commencement of any land development activities, earth disturbance, and/or issuance of building permits.

(k) Heat Mitigation.

[1] A Thermal Impact Mitigation Plan shall be submitted, including, at a minimum, strategies for waste heat reuse or dissipation. Passive cooling strategies such as cool roofs, natural vegetation (green roofs/ shade trees) and light-colored exterior walls are encouraged to mitigate urban heat islands and reduce energy consumption. The Plan will be prepared and certified by a professional engineer.

(l) Emergency Management.

[1] The applicant shall submit an Emergency Response Plan (ERP) prepared by a qualified professional. The ERP shall:

[i] Be reviewed and accepted by the City Fire Department and Lehigh County Office of Emergency Management as part of the special exception and/or land development process.

[ii] Include detailed procedures for fire suppression, containment, ventilation, and evacuation;

[iii] Include an evaluation of the access roads and hydrant locations within the site to ensure suitable access for emergency equipment within the site;

[iv] Ensure that all first responders receive adequate training specific to the installed system;

[v] Include provisions for annual fire safety inspections demonstrating compliance with fire safety standards to be performed by a qualified professional on behalf of the data center.

[2] Any Data Center use proposing battery storage or any other device or

group of devices capable of storing energy in order to supply electrical energy at a later time, whether the energy is stored for use on-site or off-site, shall demonstrate compliance with National Fire Protection Association (NFPA) Standard 855, Installation of Stationary Energy Storage Systems, or similar standards and must include fire suppression systems designed specifically for battery storage.

[3] No Data Center shall be approved unless the applicant demonstrates that procedures for fire suppression, containment, ventilation, and evacuation are sufficiently protective of public health, safety and welfare.

(m) Aesthetics.

[1] Any data center use building façade that faces a public street, MX-N-, GX-N-, or N-zoned lot, existing residential use, or other frontages per 660-18.J(9) must incorporate at least two of the following design elements every 150 horizontal feet:

- [i] A change in building material, pattern, texture, or color;
- [ii] A change in building height;
- [iii] Building step-backs or recesses having a minimum depth of five (5) feet.

(n) At least one (1) off-street loading space shall be provided for a data center.

(o) Maximum building height of 50 feet.

[1] On lots 15 acres or larger in area, the building height may be increased to a maximum of 70 feet through a special exception approval and in accordance with the supplemental workshop building regulations of 660-32.H(1)(a).

(p) All required plans, studies, evaluations, assessments, and strategies shall be submitted together with the zoning permit application. If a land development application is submitted prior to the zoning permit application, such documents shall be submitted together with the land development application. Such documents shall be subject to review and comment by the City. The City shall have the right to require supplements and/or amendments to such documents based upon comments by the City prior to any zoning approval.

(q) Applications for approval of data center use projects shall be referred to the Allentown City Planning Commission (ACPC) and Allentown Environmental Advisory Council (AEAC), for review and comment. Feedback from the ACPC, AEAC, and (when requested) Allentown Shade Tree Commission, shall be reviewed by the applicant and incorporated into any necessary mitigation strategies.

(r) All documents required by this section, 660-38.H, must be reviewed and accepted by the City Engineer or third-party consultant. When the city determines that competent and expeditious review of the documents detailed in this section require review by a third-party consultant, the applicant is responsible for reasonable fees associated with such third-party consultants.

Legislative Template

- What department or bureau is this bill originating from? Where did the initiative for the bill originate?
 - City Council/ CED. The bill will amend the Zoning Ordinance to add a public notice requirement for certain industrial uses and amend the regulations for the Data Center Use, which was adopted on June 17, 2026.
- Summary and facts of the bill.
 - The purpose of this amendment is to require additional public notice for certain industrial uses and to amend the regulations for the Data Center Use by removing the use from the IG zone, adjusting setback requirements, and adding details to the Noise and Vibration and Electronic Waste sections of the code to further mitigate any potential negative effects on public health, safety and welfare.
- Purpose – Please include the following in your explanation:
 - a. What does the bill do? What are the specific goals or tasks the bill seeks to accomplish?
 - This amendment is proposed to ensure the City has additional regulations in place for the data center use that will mitigate any potential negative effects on public health, safety and welfare.
 - b. What are the benefits of doing this?
 - Any potential negative effect on public health, safety and welfare will be mitigated by the regulations proposed by this amendment.
 - c. How does this bill relate to the City’s vision/mission/priorities?
 - This ordinance aligns with the city’s mission of public health, safety and welfare.
- Financial Impact – Please include the following in your explanation:
 - a. Cost (initial and ongoing)
 - There will be no changes to the current budget.
 - b. Benefits (initial and ongoing)
 - The City and staff will be better equipped and prepared to handle potential issues that may arise due to this use.
- Funding Sources – Please include the following in your explanation:
 - a. If transferring funds, please make sure to give specific account names and numbers. If appropriating funds from a grant, please list the agency awarding the grant.
 - There will be no transfer of funds related to this amendment.

- Priority status – Are there any deadlines to be aware of?
 - Data center uses are rapidly expanding throughout the Lehigh Valley.
- Why should Council unanimously support this bill?
 - Council should unanimously support this bill to ensure the City has additional regulations in place to mitigate any potentially negative impacts of this emerging use type.

Exhibit A

Table 660-4. Use Table						ZONES																	Description & Add'l Regulations		
						MX-				GX-			N							I				P	
						D	C	S	N	D	C	N	NX	N1	N2	N3	N4	N5	IX	IG	IM	P1		P2	
RESIDENTIAL (See 660-36)																									
Household Living																									
Household Living	☐	☐	☐	☐	●	●	●	●	●	●	●	●	●	-	-	-	-	-	660-36.A						
Adaptive Reuse	○	○	○	○	○	○	○	-	-	-	-	-	-	-	-	-	-	-	660-36.A						
Number of Allowed Units per building	Regulated by building type (see Article 4)																								
Student Residence																									
Regulated only within the Student Residence Overlay (SRO) zone (see 660-10)																			660-36.B						
Group Home																									
Small	-	-	-	-	○	○	○	○	○	○	○	○	○	-	-	-	-	-	660-36.C						
Large	-	-	-	-	-	○	○	○	○	○	-	-	-	-	-	-	-	-	660-36.C						
Congregate Living																									
Dormitory	☐	☐	☐	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	●	660-36.D						
Drug or Alcohol Rehabilitation Facility	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D						
Fraternity or Sorority	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	●	660-36.D						
Halfway House	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D						
Nursing Home	-	☐	☐	○	-	○	○	○	○	○	-	-	-	-	-	-	-	●	660-36.D						
Personal Care Home	-	☐	☐	○	-	○	○	○	○	○	-	-	-	-	-	-	-	●	660-36.D						
Rooming or Boarding House	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D						
Temporary Shelters	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D						
Other Congregate Living Arrangements	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D						
COMMERCIAL (See 660-37)																									
Adult Use																									
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	-	-	-	660-37.A						
Animal Service																									
Indoor	●	●	●	☐	●	●	☐	-	-	-	-	-	-	●	●	●	-	-	660-37.B						
Outdoor, Limited	☐	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	○	660-37.B						
Outdoor, General	-	-	○	-	-	-	-	-	-	-	-	-	-	-	●	-	-	○	660-37.B						
Child Care																									
Family Child Care Home	-	-	-	●	-	●	●	●	●	●	●	●	●	-	-	-	-	-	660-37.C						
Group Child Care Home	-	-	-	-	-	●	●	●	-	○	○	○	○	-	-	-	-	-	660-37.C						
Micro Child Care Center	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	●	●	-	●	660-37.C						
Child Care Center	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	●	●	-	●	660-37.C						
Consumer Service, Indoor																									
Art Gallery	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	○	660-37.D						
Business Support Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	-	660-37.D						
Maintenance & Repair Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	●	●	-	-	660-37.D						
Personal Improvement Service	●	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	-	660-37.D						
Studio, Artist or Instructional Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	○	660-37.D						
Business Training	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	●	●	-	-	660-37.D						
Personal Credit Establishment	-	○	●	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	-	660-37.D						
Day Care Center, Adult																									
	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	●	●	-	●	660-37.E						
Eating and Drinking Places																									

Table 660-4. Use Table		ZONES																Description & Add'l Regulations		
		MX-				GX-			N						I				P	
		D	C	S	N	D	C	N	NX	N1	N2	N3	N4	N5	IX	IG	IM		P1	P2
RESIDENTIAL (See 660-36)																				
Household Living																				
Household Living														-	-	-	-	-	660-36.A	
Adaptive Reuse								-	-	-	-	-	-	-	-	-	-	-	660-36.A	
Number of Allowed Units per building	Regulated by building type (see Article 4)																			
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Group Home																				
Small	-	-	-	-										-	-	-	-	-	660-36.C	
Large	-	-	-	-	-						-	-	-	-	-	-	-	-	660-36.C	
Congregate Living																				
Dormitory				-			-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Drug or Alcohol Rehabilitation Facility	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Fraternity or Sorority	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Halfway House	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Nursing Home	-				-						-	-	-	-	-	-	-		660-36.D	
Personal Care Home	-				-						-	-	-	-	-	-	-		660-36.D	
Rooming or Boarding House	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Temporary Shelters	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
Other Congregate Living Arrangements	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-		660-36.D	
COMMERCIAL (See 660-37)																				
Adult Use	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-	660-37.A	
Animal Service																				
Indoor								-	-	-	-	-	-				-	-	660-37.B	
Outdoor, Limited				-			-	-	-	-	-	-	-	-	-	-	-		660-37.B	
Outdoor, General	-	-		-	-	-	-	-	-	-	-	-	-	-		-	-		660-37.B	
Child Care																				
Family Child Care Home	-	-	-		-									-	-	-	-	-	660-37.C	
Group Child Care Home	-	-	-	-	-				-					-	-	-	-	-	660-37.C	
Micro Child Care Center								-	-	-	-	-	-				-		660-37.C	
Child Care Center								-	-	-	-	-	-				-		660-37.C	
Consumer Service, Indoor																				
Art Gallery								-	-	-	-	-	-	-	-	-	-		660-37.D	
Business Support Service								-	-	-	-	-	-		-	-	-	-	660-37.D	
Maintenance & Repair Service								-	-	-	-	-	-				-	-	660-37.D	
Personal Improvement Service								-	-	-	-	-	-		-	-	-	-	660-37.D	
Studio, Artist or Instructional Service								-	-	-	-	-	-		-	-	-		660-37.D	
Business Training								-	-	-	-	-	-				-	-	660-37.D	
Personal Credit Establishment	-			-			-	-	-	-	-	-	-	-	-	-	-	-	660-37.D	
Day Care Center, Adult								-	-	-	-	-	-				-		660-37.E	
Eating and Drinking Places																				
Bring-Your-Own-Bottle Establishment				-			-	-	-	-	-	-	-	-	-	-	-	-	660-37.F	
Catering					-			-	-	-	-	-	-				-	-	660-37.F	
Restaurant								-	-	-	-	-	-		-	-	-		660-37.F	
Tavern				-			-	-	-	-	-	-	-	-	-	-	-	-	660-37.F	
Food Truck				-			-	-	-	-	-	-	-	-	-	-	-	-	660-37.F	
Entertainment, Spectator/ Participant																				
Betting Use				-		-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G	

Skills Game	☐	○	○	-	○	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Indoor, Small	●	●	●	☐	●	●	☐	-	-	-	-	-	-	-	-	-	-	660-37.G
Indoor, Large	●	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Outdoor	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Funeral & Mortuary Service	-	-	●	-	-	●	○	-	-	-	-	-	-	-	-	-	-	660-37.H
Lodging																		
B & B Inn	-	-	-	-	-	●	●	-	-	-	-	-	-	-	-	-	-	660-37.I
Hotel/Motel	●	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.I
Marina	-	-	-	-	-	●	-	-	-	-	-	-	-	-	-	-	●	660-37.J
Office																		
Admin., Business or Professional Office	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	660-37.K
Medical Lab or Health-Related Service	☐	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.K
Financial Service	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	660-37.K
Service Office	☐	☐	●	-	●	☐	-	-	-	-	-	-	-	●	●	●	-	660-37.K
Walk-In Office	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	660-37.K
Retail Sales																		
Indoor	●	●	●	●	●	☐	☐	-	-	-	-	-	-	●	-	-	-	660-37.L
Outdoor	-	○	○	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.L
Self-Service Storage	-	-	-	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.M
Vehicle Sales & Service																		
Personal Vehicle Repair & Maintenance, Minor	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
Personal Vehicle Repair & Maintenance, Major	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-37.N
Personal Vehicle Sales and Rentals	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.N
Fueling Station	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
MANUFACTURING & INDUSTRY (See 660-38)																		
Artisan Manufacturing	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	●	●	-	660-38.A
Low-Impact Manufacturing	☐	☐	☐	-	●	☐	-	-	-	-	-	-	-	●	●	●	-	660-38.B
Moderate-Impact Manufacturing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.C
High-Impact Industry	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	-	660-38.D
Industrial Service	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.E
Recycling Use																		
Recyclable Material Collection	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.F
Recyclable Material Processing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	●	-	660-38.F
Warehousing & Distribution																		
Indoor, Up to 50,000 sq. ft. GFA	☐	☐	☐	-	☐	☐	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Indoor, More than 50,000 sq. ft. GFA	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Outdoor, More than 50,000 sq. ft. (site area)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.G
Outdoor Industrial Sites	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	-	660-19.C
Data Center Use	-	-	-	-	-	-	-	-	-	-	-	-	-	-	☐	○	-	660-38.H
CIVIC & INSTITUTIONAL (See 660-39)																		
Cemetery	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	660-39.A
College or University	☐	●	●	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	660-39.B
Community Assembly	●	●	●	○	●	☐	○	-	-	-	-	-	-	-	-	-	-	660-39.C
Detention or Correctional Facility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-39.D
Governmental Uses	●	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	660-39.E
Hospital	-	☐	☐	-	-	○	-	-	-	-	-	-	-	-	-	-	-	660-39.F
Library or Cultural Exhibit	●	●	●	○	●	●	○	-	-	-	-	-	-	-	-	-	○	660-39.G
Parks and Open Space	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.H
School	☐	☐	☐	○	●	○	○	-	-	-	-	-	-	-	-	-	-	660-39.I
Transportation Facilities	-	-	●	-	●	-	-	-	-	-	-	-	-	-	●	●	-	660-39.J

Infrastructure & Utilities																			
Minor	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.K
Major	○	○	○	○	○	○	○	○	○	○	○	○	○	●	●	●	○	○	660-39.L
OTHER PRINCIPLE USES (See 660-40)																			
Agriculture	⦿	●	●	●	⦿	●	●	●	●	●	●	●	●	●	●	●	●	●	660-40.A
Communication, Commercial																			
Antenna	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-40.B
Tower	-	-	○	-	-	-	-	-	-	-	-	-	○	●	●	○	○	660-40.B	
Live/Work Units	⦿	⦿	⦿	⦿	⦿	●	●	-	○	○	-	-	-	-	-	-	-	660-40.C	
Off-Street Parking	○	○	○	○	○	○	○	○	○	○	-	-	-	○	-	-	○	660-40.D	
Key (see 660-34.B): ● = permitted ○ = special exception approval required ⦿ = permitted above, below, or at rear of ground story ① = permitted in limited area ⦿ = special exception on mixed-use corridor - = prohibited																			

● = permitted in limited area | ● = special exception on mixed-use corridor | - = prohibited

Exhibit B

ORDINANCE NO.

FILE OF CITY COUNCIL

BILL NO. - 2026

MARCH 4, 2026

AN ORDINANCE

Amending Part II General Legislation, Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table and Section 660-38 Manufacturing & Industry Group, adding the use category Data Center Use; and Article 14 Measurements & Definitions, Section 660-135 Terms Beginning with “D” and Section 660-149 Terms Beginning with “R”, adding the definition of Data Center, Data Center Accessory Use, and Renewable Energy.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF ALLENTOWN:

Chapter 660 Zoning

[Adopted by the City Council of the City of Allentown 10-15-2025 by Ord. No. 16166 (Part 13, Title 1, of the 1962 Codified Ordinances). Amendments noted where applicable.]

SECTION ONE: That Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table, be amended as follows on Exhibit A, Table 660-4 Use Table.

SECTION TWO: That Chapter 660 Zoning, Article 5 Uses, Section 660-38 Manufacturing & Industry Group, be amended as follows:

§ 660-38 Manufacturing & Industry Group

The manufacturing and Industry use group includes establishments involved in manufacturing, processing, fabrication, packaging, or assembly of goods or the servicing of industrial or commercial machinery, equipment, products or by-products. Uses in this group may include offices and ancillary retail sales as accessory uses.

...

660-38.H DATA CENTER USE

- (1) Use Category Description.** The data center use category includes a building, buildings, or structures which are occupied primarily by computers and/or telecommunications and related equipment where digital information is processed, transferred and/or stored, primarily to and from offsite locations. This use does not include computers or telecommunications related equipment that is secondary and customarily incidental to an otherwise permitted use on the property, such as servers associated with an office building. This use shall also include cryptocurrency mining, blockchain transaction processing, and server farms. The Data Center Use shall include data center as a principal or accessory use and data center accessory uses (see 660-135).

(2) Supplemental Use Regulations. Data center uses are subject to the following supplemental use regulations:

(a) No new data center use or accessory data center use may be located within:

[1] 75 feet of the right-of-way of a public street;

[2] 200 feet of the lot line of any:

[i] Use within the Residential use group;

[ii] Use within the Civic & Institutional use group (except Cemetery, Governmental Use, Transportation Facilities or Infrastructure & Utilities);

[iii] Child Care use category; or

[iv] Any MX-N-, GX-N-, or N-zoned lot.

[3] 50 feet of any other lot line.

(b) Data center uses with more than 50,000 square feet of indoor gross floor area require a minimum lot area of 5 acres in the IG zone and 8 acres in the IM zone.

(c) A landscaped buffer, including shade trees, evergreen trees, and planting beds, with a minimum width of 25 feet must be provided around the perimeter of the use, except for necessary perpendicular crossings. Rows of shade trees and evergreen trees are to be staggered to create a dense buffer with planting beds at the exterior rows. See 660-78.F for distance and size requirements for plantings in each row. Native plants are encouraged to the maximum extent possible. The Allentown Shade Tree Commission (ASTC) may provide comments on specific plantings.

(d) The zoning hearing board is expressly authorized to require berms, landscaping, fencing and additional setbacks as needed to protect the public health and safety and to avoid conflicts with neighboring uses.

(e) The applicant shall submit a narrative description of the nature of the proposed onsite activities and operations, anticipated hours of operation, anticipated frequencies and types of vehicle trips generated, and anticipated types of materials/equipment stored on site. Information obtained from any required Transportation Impact Statements/Analyses may be summarized here.

(f) Environmental Impact.

[1] The applicant shall submit an evaluation of possible environmental impacts, and where necessary, propose mitigation strategies. The assessment must be prepared by a qualified professional, and consider both normal/ typical conditions and adverse conditions (i.e. drought, extended power outages, extreme heat, etc.) relevant to the following:

[i] Air quality;

[ii] Surrounding soil quality;

[iii] Surrounding water quality;

[iv] Groundwater sources;

[v] Wildlife and wildlife habitat; and

[vi] Greenhouse gas emissions.

(g) Noise and Vibration.

[1] A sound study shall be produced by a licensed professional engineer specializing in acoustics or an engineer Board Certified by the Institute of Noise Control Engineers to demonstrate that the data center and data center accessory uses will conform with the requirements of Chapter 400, Noise. Sound study should also assess any persistent tonal sounds (hums) or other consistent low-frequency or ambient noise. The licensed professional must state whether noise mitigation measures are recommended by noise study and, if so, identify the applicable mitigation measures.

[2] An as-built sound study shall be conducted six months after issuance of the Certificate of Occupancy for any data center and data center accessory uses and upon request by the City thereafter to ensure continuous compliance with the requirements of Chapter 400, Noise, and consistent with the representations and/or mitigation strategies described in the sound study.

[3] A vibration study prepared by a qualified professional shall be provided that demonstrates that no vibration from the data center and data center accessory uses will be perceptible to the human sense of feeling beyond the property line.

(h) Water and Sewer.

[1] A Water Utilization Report shall be submitted detailing, at a minimum the total daily intake volume and source(s) of that water, discharge volumes and destinations, cooling system type and efficiency, and shall demonstrate compliance with the city's stormwater ordinances and regulations. The Report shall be prepared and certified by a professional engineer. The Report shall be subject to review and comment by the City. The City shall have the right to require supplemental or amended reports based upon comments by the City prior to any zoning approval.

[2] The applicant shall submit documentation from the Lehigh County Authority (LCA) certifying that the Authority will supply the water needed for the use. If the LCA or the City identify a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the infrastructure upgrades and/or system improvements necessary to supply the facility.

[3] If the use uses nonpublic water sources, the applicant shall provide a water feasibility study to determine if there is an adequate supply of water for the use and to estimate the impact on existing wells, groundwater, and surface water in the vicinity. The study shall be reviewed and approved by the Delaware River Basin Commission, LCA and PA Department of Environmental Protection (PA DEP) for water withdrawals from groundwater or streams, where applicable.

[4] The applicant is strongly encouraged to utilize water efficient cooling technology that minimizes the use of water for cooling.

[5] The applicant shall demonstrate adequate means of wastewater disposal have been provided and approved by the PA DEP. Discharge of water used as a direct or indirect cooling medium for equipment is not an authorized non-stormwater discharge into the Municipal Separate Storm Sewer System (MS4) per the City's MS4 NPDES permit.

(i) Power Supply.

[1] The applicant shall identify the portion of its energy use that will be met through on-site renewable energy generation. Data centers are encouraged to make good faith efforts to maximize use of renewable and/or clean energy for electrical and cooling needs, either through on-site generation or verifiable power purchase agreements (PPAs).

[2] An Energy Management Plan shall be submitted detailing at a minimum, annual electricity demand, the supply sources to be utilized, energy storage capacity (if applicable) and efforts made to maximize energy efficiency and use of renewable or clean energy. The plan shall be prepared and certified by a professional engineer.

[3] If the applicant proposes to connect the use to the electric grid, the

applicant shall provide documentation from the applicable electric service provider certifying the necessary capacity is available and the provider will serve the use. An assessment identifying any impacts on electric rates or availability for other uses directly attributable to the use shall be provided to the City.

[4] If the assessment identifies a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the system improvements necessary to mitigate any limits or system improvements necessary.

[5] If the necessary system improvements are determined by the City Engineer and the respective public utility provider to be infeasible, then on-site utility methods may be considered in compliance with all City ordinances.

(j) Electronic Waste.

[1] An Electronic Waste Plan shall be submitted outlining procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products, which will apply in cases when the data center is updated or decommissioned.

(k) Heat Mitigation.

[1] A Thermal Impact Mitigation Plan shall be submitted, including, at a minimum, strategies for waste heat reuse or dissipation. Passive cooling strategies such as cool roofs, natural vegetation (green roofs/ shade trees) and light-colored exterior walls are encouraged to mitigate urban heat islands and reduce energy consumption. The Plan will be prepared and certified by a professional engineer.

(l) Emergency Management.

[1] The applicant shall submit an Emergency Response Plan (ERP) prepared by a qualified professional. The ERP shall:

[i] Be reviewed and accepted by the City Fire Department and Lehigh County Office of Emergency Management as part of the special exception and/or land development process.

[ii] Include detailed procedures for fire suppression, containment, ventilation, and evacuation;

[iii] Include an evaluation of the access roads and hydrant locations within the site to ensure suitable access for emergency equipment within the site;

[iv] Ensure that all first responders receive adequate training specific to the installed system;

[v] Include provisions for annual fire safety inspections demonstrating compliance with fire safety standards to be performed by a qualified professional on behalf of the data center.

[2] Any Data Center use proposing battery storage or any other device or group of devices capable of storing energy in order to supply electrical energy at a later time, whether the energy is stored for use on-site or off-site, shall demonstrate compliance with National Fire Protection Association (NFPA) Standard 855, Installation of Stationary Energy Storage Systems, or similar standards and must include fire suppression systems designed specifically for battery storage.

[3] No Data Center shall be approved unless the applicant demonstrates that procedures for fire suppression, containment, ventilation, and evacuation are sufficiently protective of public health, safety and welfare.

(m) Aesthetics.

[1] Any data center use building façade that faces a public street, MX-N-, GX-N-, or N-zoned lot, existing residential use, or other frontages per 660-18.J(9) must incorporate at least two of the following design elements every 150 horizontal feet:

[i] A change in building material, pattern, texture, or color;

[ii] A change in building height;

[iii] Building step-backs or recesses having a minimum depth of five (5) feet.

(n) At least one (1) off-street loading space shall be provided for a data center.

(o) Maximum building height of 50 feet.

[1] On lots 15 acres or larger in area, the building height may be increased to a maximum of 70 feet through a special exception approval and in accordance with the supplemental workshop building regulations of 660-32.H(1)(a).

(p) All required plans, studies, evaluations, assessments, and strategies shall be submitted together with the zoning permit application. If a land development application is submitted prior to the zoning permit application, such documents shall be submitted together with the land development application. Such documents shall be subject to review and comment by the City. The City shall have the right to require supplements and/or amendments to such documents based upon comments by the City prior to any zoning approval.

(q) Applications for approval of data center use projects shall be referred to the Allentown City Planning Commission (ACPC) and Allentown Environmental Advisory Council (AEAC), for review and comment. Feedback from the ACPC, AEAC, and (when requested) Allentown Shade Tree Commission, shall be reviewed by the applicant and incorporated into any necessary mitigation strategies.

(r) All documents required by this section, 660-38.H, must be reviewed and accepted by the City Engineer or third-party consultant. When the city determines that competent and expeditious review of the documents detailed in this section require review by a third-party consultant, the applicant is responsible for reasonable fees associated with such third-party consultants.

SECTION THREE: That Chapter 660 Zoning, Article 14 Measurements & Definitions, Section 660-135 Terms Beginning with "D," be amended as follows:

§ 660-135 Terms Beginning with "D"

DATA CENTER. A building, buildings, or structures which are occupied primarily by computers and/or telecommunications and related equipment where digital information is processed, transferred and/or stored, primarily to and from offsite locations. This use does not include computers or telecommunications related equipment that is secondary and customarily incidental to an otherwise permitted use on the property, such as servers associated with an office building. This use shall also include cryptocurrency mining, blockchain transaction processing, and server farms. Data Centers shall include Data Center Accessory Uses.

DATA CENTER ACCESSORY USE. Ancillary uses, equipment, or structures secondary and incidental to a Data Center Use, including but not limited to: administrative, logistical, fiber optic, storage, and security buildings or structures; sources of electrical power such as generators used to provide temporary power when the main source of power is interrupted; electrical substations; utilities; utility lines; domestic and non-contact cooling water and wastewater

treatment facilities; water holding facilities; pump stations; water towers; environmental controls (air conditioning or cooling towers, fire suppression, and related equipment); redundant data communication connections; security features, provided such data center accessory uses/structures are located on the same tract or assemblage of adjacent parcels developed as a unified development with a Data Center. The use shall not include energy generation systems used or intended to be used to supply power to the Data Center during normal operations.

...

SECTION FOUR: That Chapter 660 Zoning, Article 14 Measurements & Definitions, Section 660-149 Terms Beginning with “R,” be amended as follows:

...

RENEWABLE ENERGY. Renewable Energy is energy generated from natural sources that are replenished faster than they are consumed. Renewable or “Clean” energy sources are generated by sunlight, wind, water, tidal, geothermal heat, or biomass sources.

SECTION FIVE: That this Ordinance will take effect five (5) days after final passage.

SECTION SIX: That all Ordinances inconsistent with the above provisions are repealed to the extent of their inconsistency.

SECTION SEVEN: The provisions of this Ordinance are separate and severable. If any section, clause or provision or portion of this Ordinance shall be held to be unenforceable or invalid by any Court of competent jurisdiction, the unenforceability or invalidity of any such provision shall not affect the validity and enforceability of the remaining provisions which shall remain valid and continue in effect.

WHEREAS, the City of Allentown is a community that enjoys a quality of life that people want to invest in and where they want to live and raise a family coupled with an attractive area for business and job growth; and

WHEREAS, the City of Allentown has concluded that the recent surge of development of Data Centers and similarly associated facilities in the Commonwealth has generated the necessity to amend Chapter 660 (Zoning) to provide for and regulate these facilities in order to preserve the quality of life and to promote, protect and facilitate the public health, safety and welfare; and

WHEREAS, pursuant to Section 609 of the Municipalities Planning Code, 53 P.S. § 10609, the City of Allentown is authorized and empowered to enact amendments to the City of Allentown Zoning Ordinance after public hearing thereon pursuant to public notice.

Legislative Template

- What department or bureau is this bill originating from? Where did the initiative for the bill originate?
 - CED/Bureau of Planning & Zoning. The bill will amend the Zoning Ordinance to add the use type, regulations and definitions for: Data Center Use.
- Summary and facts of the bill.
 - The purpose of this amendment adds the data center use to the zoning ordinance along with regulations and definitions for said use. This is an emerging use within the Lehigh Valley, State of Pennsylvania and across the country. Without regulations, this use could potentially have negative effects on public health, safety and welfare.
- Purpose – Please include the following in your explanation:
 - a. What does the bill do? What are the specific goals or tasks the bill seeks to accomplish?
 - This amendment is proposed to ensure the City has regulations in place for the data center use that will mitigate any potential negative effects on public health, safety and welfare.
 - b. What are the benefits of doing this?
 - This new use type will be regulated by the City.
 - Any potential negative effect on public health, safety and welfare will be mitigated by the regulations proposed by this amendment.
 - c. How does this bill relate to the City’s vision/mission/priorities?
 - This ordinance aligns with the city’s mission of public health, safety and welfare.
- Financial Impact – Please include the following in your explanation:
 - a. Cost (initial and ongoing)
 - There will be no changes to the current budget.
 - b. Benefits (initial and ongoing)
 - The City and staff will be better equipped to handle potential issues that may arise due to this use and be prepared and capable of handling emergencies at such site.
- Funding Sources – Please include the following in your explanation:
 - a. If transferring funds, please make sure to give specific account names and numbers. If appropriating funds from a grant, please list the agency awarding the grant.

- There will be no transfer of funds related to this amendment.
- Priority status – Are there any deadlines to be aware of?
 - Data center uses are rapidly expanding throughout the Lehigh Valley. Any data center application submitted prior to advertising will be review under current codes.
- Why should Council unanimously support this bill?
 - Council should unanimously support this bill to ensure the City has regulations in place to mitigate any potentially negative impacts of this emerging use type. Staff has been receiving inquiries for this use over the past couple of months. Other municipalities in the area have already or are in the process of amending their zoning ordinances to add this use type as well. Draft has been reviewed by the Allentown Environmental Advisory Council.

Exhibit A

Table 660-4. Use Table		ZONES																	Description & Add'l Regulations	
		MX-				GX-			N						I			P		
		D	C	S	N	D	C	N	NX	N1	N2	N3	N4	N5	IX	IG	IM	P1		P2
RESIDENTIAL (See 660-36)																				
Household Living																				
Household Living	☐	☐	☐	☐	●	●	●	●	●	●	●	●	●	-	-	-	-	-	660-36.A	
Adaptive Reuse	○	○	○	○	○	○	○	-	-	-	-	-	-	-	-	-	-	-	660-36.A	
Number of Allowed Units per building	Regulated by building type (see Article 4)																			
Student Residence		Regulated only within the Student Residence Overlay (SRO) zone (see 660-10)																		660-36.B
Group Home																				
Small	-	-	-	-	○	○	○	○	○	○	○	○	○	-	-	-	-	-	660-36.C	
Large	-	-	-	-	-	○	○	○	○	○	-	-	-	-	-	-	-	-	660-36.C	
Congregate Living																				
Dormitory	☐	☐	☐	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	●	660-36.D	
Drug or Alcohol Rehabilitation Facility	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D	
Fraternity or Sorority	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	●	660-36.D	
Halfway House	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D	
Nursing Home	-	☐	☐	○	-	○	○	○	○	○	-	-	-	-	-	-	-	●	660-36.D	
Personal Care Home	-	☐	☐	○	-	○	○	○	○	○	-	-	-	-	-	-	-	●	660-36.D	
Rooming or Boarding House	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D	
Temporary Shelters	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D	
Other Congregate Living Arrangements	-	-	-	-	-	☐	-	-	-	-	-	-	-	-	-	-	-	○	660-36.D	
COMMERCIAL (See 660-37)																				
Adult Use	-	-	-	-	-	-	-	-	-	-	-	-	-	○	-	-	-	-	660-37.A	
Animal Service																				
Indoor	●	●	●	☐	●	●	☐	-	-	-	-	-	-	☐	☐	☐	-	-	660-37.B	
Outdoor, Limited	☐	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	○	660-37.B	
Outdoor, General	-	-	○	-	-	-	-	-	-	-	-	-	-	-	●	-	-	○	660-37.B	
Child Care																				
Family Child Care Home	-	-	-	●	-	●	●	●	●	●	●	●	●	-	-	-	-	-	660-37.C	
Group Child Care Home	-	-	-	-	-	●	●	●	-	○	○	○	○	-	-	-	-	-	660-37.C	
Micro Child Care Center	☐	●	●	●	●	●	●	-	-	-	-	-	-	☐	☐	☐	-	●	660-37.C	
Child Care Center	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	☐	☐	-	●	660-37.C	
Consumer Service, Indoor																				
Art Gallery	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	○	660-37.D	
Business Support Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	-	660-37.D	
Maintenance & Repair Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	●	●	-	-	660-37.D	
Personal Improvement Service	●	●	●	●	●	●	●	-	-	-	-	-	-	☐	-	-	-	-	660-37.D	
Studio, Artist or Instructional Service	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	○	660-37.D	
Business Training	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	●	●	-	-	660-37.D	
Personal Credit Establishment	-	○	●	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	-	660-37.D	
Day Care Center, Adult	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	☐	☐	-	●	660-37.E	
Eating and Drinking Places																				
Bring-Your-Own-Bottle Establishment	●	☐	●	-	●	☐	-	-	-											

Table 660-4. Use Table		ZONES																	Description & Add'l Regulations	
		MX-				GX-			N					I			P			
		D	C	S	N	D	C	N	NX	N1	N2	N3	N4	N5	IX	IG	IM	P1		P2
RESIDENTIAL (See 660-36)																				
Household Living																				
Household Living																				660-36.A
Adaptive Reuse																				660-36.A
Number of Allowed Units per building	Regulated by building type (see Article 4)																			
Student Residence	Regulated only within the Student Residence Overlay (SRO) zone (see 660-10)																		660-36.B	
Group Home																				
Small																				660-36.C
Large																				660-36.C
Congregate Living																				
Dormitory																				660-36.D
Drug or Alcohol Rehabilitation Facility																				660-36.D
Fraternity or Sorority																				660-36.D
Halfway House																				660-36.D
Nursing Home																				660-36.D
Personal Care Home																				660-36.D
Rooming or Boarding House																				660-36.D
Temporary Shelters																				660-36.D
Other Congregate Living Arrangements																				660-36.D
COMMERCIAL (See 660-37)																				
Adult Use																				660-37.A
Animal Service																				
Indoor																				660-37.B
Outdoor, Limited																				660-37.B
Outdoor, General																				660-37.B
Child Care																				
Family Child Care Home																				660-37.C
Group Child Care Home																				660-37.C
Micro Child Care Center																				660-37.C
Child Care Center																				660-37.C
Consumer Service, Indoor																				
Art Gallery																				660-37.D
Business Support Service																				660-37.D
Maintenance & Repair Service																				660-37.D
Personal Improvement Service																				660-37.D
Studio, Artist or Instructional Service																				660-37.D
Business Training																				660-37.D
Personal Credit Establishment																				660-37.D
Day Care Center, Adult																				660-37.E
Eating and Drinking Places																				
Bring-Your-Own-Bottle Establishment																				660-37.F
Catering																				660-37.F
Restaurant																				660-37.F
Tavern																				660-37.F
Food Truck																				660-37.F
Entertainment, Spectator/ Participant																				
Betting Use																				660-37.G

Skills Game	☐	○	○	-	○	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Indoor, Small	●	●	●	☐	●	●	☐	-	-	-	-	-	-	-	-	-	-	660-37.G
Indoor, Large	●	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Outdoor	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Funeral & Mortuary Service	-	-	●	-	-	●	○	-	-	-	-	-	-	-	-	-	-	660-37.H
Lodging																		
B & B Inn	-	-	-	-	-	●	●	-	-	-	-	-	-	-	-	-	-	660-37.I
Hotel/Motel	●	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.I
Marina	-	-	-	-	-	●	-	-	-	-	-	-	-	-	-	-	●	660-37.J
Office																		
Admin., Business or Professional Office	☐	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	660-37.K
Medical Lab or Health-Related Service	☐	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.K
Financial Service	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	660-37.K
Service Office	☐	☐	●	-	●	☐	-	-	-	-	-	-	-	●	●	●	-	660-37.K
Walk-In Office	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	660-37.K
Retail Sales																		
Indoor	●	●	●	●	●	☐	☐	-	-	-	-	-	-	●	-	-	-	660-37.L
Outdoor	-	○	○	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.L
Self-Service Storage	-	-	-	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.M
Vehicle Sales & Service																		
Personal Vehicle Repair & Maintenance, Minor	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
Personal Vehicle Repair & Maintenance, Major	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-37.N
Personal Vehicle Sales and Rentals	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.N
Fueling Station	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
MANUFACTURING & INDUSTRY (See 660-38)																		
Artisan Manufacturing	☐	●	●	○	●	●	○	-	-	-	-	-	-	●	●	●	-	660-38.A
Low-Impact Manufacturing	☐	☐	☐	-	●	☐	-	-	-	-	-	-	-	●	●	●	-	660-38.B
Moderate-Impact Manufacturing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.C
High-Impact Industry	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	-	660-38.D
Industrial Service	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.E
Recycling Use																		
Recyclable Material Collection	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.F
Recyclable Material Processing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	●	-	660-38.F
Warehousing & Distribution																		
Indoor, Up to 50,000 sq. ft. GFA	☐	☐	☐	-	☐	☐	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Indoor, More than 50,000 sq. ft. GFA	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Outdoor, More than 50,000 sq. ft. (site area)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.G
Outdoor Industrial Sites	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	-	660-19.C
Data Center Use	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	○	-	660-38.H
CIVIC & INSTITUTIONAL (See 660-39)																		
Cemetery	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	660-39.A
College or University	☐	●	●	-	●	☐	-	-	-	-	-	-	-	-	-	-	-	660-39.B
Community Assembly	●	●	●	○	●	☐	○	-	-	-	-	-	-	-	-	-	-	660-39.C
Detention or Correctional Facility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-39.D
Governmental Uses	●	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	-	660-39.E
Hospital	-	☐	☐	-	-	○	-	-	-	-	-	-	-	-	-	-	-	660-39.F
Library or Cultural Exhibit	●	●	●	○	●	●	○	-	-	-	-	-	-	-	-	-	○	660-39.G
Parks and Open Space	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.H
School	☐	☐	☐	○	●	○	○	-	-	-	-	-	-	-	-	-	-	660-39.I
Transportation Facilities	-	-	●	-	●	-	-	-	-	-	-	-	-	-	●	●	-	660-39.J

Infrastructure & Utilities																			
Minor	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.K
Major	○	○	○	○	○	○	○	○	○	○	○	○	○	●	●	●	○	○	660-39.L
OTHER PRINCIPLE USES (See 660-40)																			
Agriculture	☉	●	●	●	☉	●	●	●	●	●	●	●	●	●	●	●	●	●	660-40.A
Communication, Commercial																			
Antenna	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-40.B
Tower	-	-	○	-	-	-	-	-	-	-	-	-	○	●	●	○	○	660-40.B	
Live/Work Units	☉	☉	☉	☉	☉	●	●	-	○	○	-	-	-	-	-	-	-	660-40.C	
Off-Street Parking	○	○	○	○	○	○	○	○	○	○	-	-	-	○	-	-	○	660-40.D	
Key (see 660-34.B): ● = permitted ○ = special exception approval required ☉ = permitted above, below, or at rear of ground story ⦿ = permitted in limited area ☉ = special exception on mixed-use corridor - = prohibited																			

● = permitted in limited area | ● = special exception on mixed-use corridor | - = prohibited

Exhibit C

MICHAEL P. HANLON

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Fax: (610) 437-7554



CITY CLERK

June 24, 2026

Vicky Kistler
Director – Community and Economic Development
City Hall, Allentown, PA 18101

Jill Seitz
Chief Community and Regional Planner
Lehigh Valley Planning Commission
615 Waterfront Drive, Suite 201
Allentown, PA 18102

Hello Vicky and Jill:

Bill 52 Amending Part II General Legislation, Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table and Section 660-38 Manufacturing & Industry Group, adding public notice requirements and amending the use category Data Center Use was introduced at the June 24, 2026 City Council meeting. The bill, description of the definition, and Exhibit A.

This Bill is hereby referred to the Planning Commission and the Lehigh Valley Planning Commission for review and recommendations. I am attesting that these are true and correct copies of the proposals and the map.

Please submit your report to this office.

Very truly yours,

Michael P. Hanlon
City Clerk

Cc: Council
Mayor Matt Tuerk
Christian Brown, Chairman of the Planning Commission
Brian Borzak, Engineering
John F. Gross, City Solicitor
Megan Yarashas, Paralegal – County of Lehigh Department of Law (megan yarashas@lehighcounty.org)
John Misinco, Editor - The Morning Call, P.O. Box 1260, Allentown, PA 18105 (jmsinco@mcall.com)

ORDINANCE NO.

FILE OF CITY COUNCIL

BILL NO. 52 - 2026

JUNE 23, 2026

AN ORDINANCE

Amending Part II General Legislation, Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table and Section 660-38 Manufacturing & Industry Group, adding public notice requirements and amending the use category Data Center Use.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF ALLENTOWN:

Chapter 660 Zoning

[Adopted by the City Council of the City of Allentown 10-15-2025 by Ord. No. 16166 (Part 13, Title 1, of the 1962 Codified Ordinances). Amendments noted where applicable.]

SECTION ONE: That Chapter 660 Zoning, Article 5 Uses, Table 660-4 Use Table, be amended as follows on Exhibit A, Table 660-4 Use Table.

SECTION TWO: That Chapter 660 Zoning, Article 5 Uses, Section 660-38 Manufacturing & Industry Group, be amended as follows:

§ 660-38 Manufacturing & Industry Group

The manufacturing and Industry use group includes establishments involved in manufacturing, processing, fabrication, packaging, or assembly of goods or the servicing of industrial or commercial machinery, equipment, products or by-products. Uses in this group may include offices and ancillary retail sales as accessory uses.

- (1) **Public Notice.** Prior to the establishment of any new principal use in any of the following categories: High-Impact Industry, Recycling Use, and Data Center Use (greater than 50,000 sq ft), the following public notice requirements must be met:
 - (a) The applicant shall hold a public meeting prior to the first Zoning Hearing Board meeting where a special exception and/or variance is discussed or prior to the first Allentown City Planning Commission meeting when the proposed land development is discussed. In cases where only a Zoning Permit is required (and no special exception or variance is required), the meeting must occur two weeks prior to submittal. The purpose of the meeting shall be to inform the public about the nature of the proposed development, including the location, scale, and general characteristics. A representative(s) of the applicant with knowledge of the project and the ability to answer general questions from the public about the project's general locations, scale, and parameters shall participate in the meeting. The

public meeting shall be advertised consistent with “public notice” as defined by the Pennsylvania Municipalities Planning Code (PA Act 247).

- (b) The applicant shall create and maintain a project website for viewing by the general public. The site shall explain the project parameters, including maps, elevations/renderings, anticipated electrical use, and noise levels, beginning at least two weeks prior to the meeting(s) discussed above, and until the time of final land development approval. The site shall provide a description of the proposed use, construction timelines and phasing plans, dates of public meetings with municipal bodies, and status of permits.

...

660-38.H DATA CENTER USE

- (1) **Use Category Description.** The data center use category includes a building, buildings, or structures which are occupied primarily by computers and/or telecommunications and related equipment where digital information is processed, transferred and/or stored, primarily to and from offsite locations. This use does not include computers or telecommunications related equipment that is secondary and customarily incidental to an otherwise permitted use on the property, such as servers associated with an office building. This use shall also include cryptocurrency mining, blockchain transaction processing, and server farms. The Data Center Use shall include data center as a principal or accessory use and data center accessory uses (see 660-135).
- (2) **Supplemental Use Regulations.** Data center uses are subject to the following supplemental use regulations:
- (a) No new data center use or accessory data center use may be located within:
 - [1] 75 feet of the right-of-way of a public street;
 - [2] ~~200~~ 500 feet of the lot line of any:
 - [i] Use within the Residential use group;
 - [ii] Use within the Civic & Institutional use group (except Cemetery, Governmental Use, Transportation Facilities or Infrastructure & Utilities);
 - [iii] Child Care use category; or
 - [iv] Any MX-N-, GX-N-, or N-zoned lot.
 - [3] 50 feet of any other lot line.
 - (b) Data center uses with more than 50,000 square feet of indoor gross floor area require a minimum lot area of ~~5 acres in the IG zone and 8 acres in the IM zone.~~
 - (c) A landscaped buffer, including shade trees, evergreen trees, and planting beds, with a minimum width of 25 feet must be provided around the perimeter of the use, except for necessary perpendicular crossings. Rows of shade trees and evergreen trees are to be staggered to create a dense buffer with planting beds at the exterior rows. See 660-78.F for distance and size requirements for plantings in each row. Native plants are encouraged to the maximum extent possible. The Allentown Shade Tree Commission (ASTC) may provide comments on specific plantings.
 - (d) The zoning hearing board is expressly authorized to require berms, landscaping, fencing and additional setbacks as needed to protect the public health and safety and to avoid conflicts with neighboring uses.
 - (e) The applicant shall submit a narrative description of the nature of the proposed onsite activities and operations, anticipated hours of operation, anticipated frequencies and types of vehicle trips generated, and anticipated types of materials/equipment stored on site. Information obtained from any required Transportation Impact Statements/Analyses may be summarized here.

(f) Environmental Impact.

[1] The applicant shall submit an evaluation of possible environmental impacts, and where necessary, propose mitigation strategies. The assessment must be prepared by a qualified professional, and consider both normal/ typical conditions and adverse conditions (i.e. drought, extended power outages, extreme heat, etc.) relevant to the following:

- [i] Air quality;
- [ii] Surrounding soil quality;
- [iii] Surrounding water quality;
- [iv] Groundwater sources;
- [v] Wildlife and wildlife habitat; and
- [vi] Greenhouse gas emissions.

(g) Noise and Vibration.

[1] A full spectrum (dBA + dBC) pre and post-construction (or pre and post-conversion, as applicable) sound study shall be produced by a licensed-qualified third-party acoustical consultant professional-engineer specializing in acoustics or an engineer Board Certified by the Institute of Noise Control Engineers to demonstrate that the data center and data center accessory uses, will conform with the requirements of Chapter 400, Noise and other requirements found in this ordinance. Sound study should also assess any persistent tonal sounds (hums) or other consistent low frequency or ambient noise. The sound study must:

- [i] Document pre-existing baseline ambient noise level at the time of an initial data center plan submittal, using full spectrum modeling to address low frequency sounds.
- [ii] The study must measure daytime and nighttime noise, as well as worst-case scenario operation, which shall include full build-out operation of all mechanical equipment, including but not limited to generators, cooling systems, transformers and electrical infrastructure.
- [iii] The sound study must also assess any persistent tonal sounds (hums) or other consistent low-frequency or ambient noise including but not limited to generators, cooling systems, transformers and electrical infrastructure, and vehicular operations.
- [iv] The sound study must include a vibration study prepared by a qualified professional shall be provided that demonstrates that no vibration from the data center and data center accessory uses will be perceptible to the human sense of feeling beyond the property line.
- [iv] The sound study must indicate sound levels of any generator use during emergency and/or testing periods.

[2] The licensed professional third-party acoustical consultant must state whether noise mitigation measures are recommended by noise study and, if so, identify the applicable mitigation measures.

[3] The third-party acoustical consultant shall meet the following:

- [i] The acoustical consultant shall have no financial interest in the project other than payment for the preparation of the sound study.
- [ii] The acoustical consultant shall demonstrate:
 - a. Relevant experience in environmental noise analysis;
 - b. Appropriate education or professional credentials such as professional licensed engineer specializing in acoustics or an engineer Board Certified by the Institute

of Noise Control Engineers.

c. Prior completion of comparable sound studies.

[iii] The City reserves the right to review and approve the qualifications of the acoustical consultant and may require the selection of an alternative consultant if independence or qualifications are deemed insufficient.

[4] Prior to the issuance of a Certificate of Occupancy, the applicant shall submit an as-built sound study prepared by a qualified third-party acoustical consultant demonstrating compliance with all applicable sound standards, including both A-weighted (dBA) and C-weighted (dBC) limits, where applicable. An as-built sound study shall also be conducted six months after issuance of the Certificate of Occupancy for any data center and data center accessory uses and upon request by the City thereafter to ensure continuous compliance with the requirements of Chapter 400, Noise, and consistent with the representations and/or mitigation strategies described in the sound study.

[5] A vibration study prepared by a qualified professional shall be provided that demonstrates that no vibration from the data center and data center accessory uses will be perceptible to the human sense of feeling beyond the property line.

[6] If it is determined by the as-built sound study that there is a violation of Chapter 400, Noise, and/or if the conditions are not consistent with the representations and/or mitigation strategies described in the sound study, it shall be considered a violation of this ordinance and the conditions of approval, and the zoning officer is authorized to cancel, revoke, withhold or suspend a permit issued under the provisions of this zoning ordinance, as described in 660-123.C. Revocation of Permits.

(h) Water and Sewer.

[1] A Water Utilization Report shall be submitted detailing, at a minimum the total daily intake volume and source(s) of that water, discharge volumes and destinations, cooling system type and efficiency, and shall demonstrate compliance with the city's stormwater ordinances and regulations. The Report shall be prepared and certified by a professional engineer. The Report shall be subject to review and comment by the City. The City shall have the right to require supplemental or amended reports based upon comments by the City prior to any zoning approval.

[2] The applicant shall submit documentation from the Lehigh County Authority (LCA) certifying that the Authority will supply the water needed for the use. If the LCA or the City identify a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the infrastructure upgrades and/or system improvements necessary to supply the facility.

[3] If the use uses nonpublic water sources, the applicant shall provide a water feasibility study to determine if there is an adequate supply of water for the use and to estimate the impact on existing wells, groundwater, and surface water in the vicinity. The study shall be reviewed and approved by the Delaware River Basin Commission, LCA and PA Department of Environmental Protection (PA DEP) for water withdrawals from groundwater or streams, where applicable.

[5] The applicant shall demonstrate adequate means of wastewater disposal have been provided and approved by the PA DEP. Discharge of water used as a direct or indirect cooling medium for equipment is not an authorized non-stormwater discharge into the Municipal Separate Storm Sewer System (MS4) per the City's MS4 NPDES permit.

(i) Power Supply.

[1] The applicant shall identify the portion of its energy use that will be met through on-site renewable energy generation. Data centers are encouraged to make good faith efforts to maximize use of renewable and/or clean energy for electrical and cooling needs, either through on-site generation or verifiable power purchase agreements (PPAs).

[2] An Energy Management Plan shall be submitted detailing at a minimum, annual electricity demand, the supply sources to be utilized, energy storage capacity (if applicable) and efforts made to maximize energy efficiency and use of renewable or clean energy. The plan shall be prepared and certified by a professional engineer.

[3] If the applicant proposes to connect the use to the electric grid, the applicant shall provide documentation from the applicable electric service provider certifying the necessary capacity is available and the provider will serve the use. An assessment identifying any impacts on electric rates or availability for other uses directly attributable to the use shall be provided to the City.

[4] If the assessment identifies a detrimental impact or threshold where utility capacity is not sufficient, the applicant shall provide, at their own expense, the system improvements necessary to mitigate any limits or system improvements necessary.

[5] If the necessary system improvements are determined by the City Engineer and the respective public utility provider to be infeasible, then on-site utility methods may be considered in compliance with all City ordinances.

(j) Electronic Waste and Decommissioning:

[1] An Electronic Waste Plan shall be submitted outlining procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products, which will apply in cases when the data center is updated or decommissioned.

[2] A Decommissioning and Site Restoration Plan shall be submitted. Upon cessation of operation of the data center use and/or data center accessory use for a period of at least 12 months, except where the city agrees to allow the owner or operator additional time due to their intent to re-continue such use in the near future, the owner or operator of the use shall ensure the following standards are met:

[i] All generators, tanks, battery systems, electrical infrastructure, accessory structures, and related improvements associated with such use shall be removed from the subject property.

[ii] Hazardous materials, including batteries, fuel or refrigerants shall be disposed of in compliance with state and federal law.

[iii] Disturbed soils shall be stabilized and re-vegetated.

[iv] Any utility connections shall be safely disconnected and capped.

[v] The site shall be restored to a condition compatible with surrounding land uses or consistent with the most restrictive adjacent zoning district.

[3] Said removal activities shall commence within one year of the conclusion of the 12-month period referenced above and shall be completed no later than three years following the commencement of the removal activities.

[4] To ensure removal as described, the applicant shall provide a decommissioning and site restoration bond or letter of credit in the form acceptable to the city and naming the city as a beneficiary sufficient to remove all generators, fuel tanks, battery systems, electrical infrastructures, and related improvements and to restore the site for future reuse.

[5] If the owner or operator fails to comply with this section, the city may utilize

such financial security to perform or cause the performance of the removal of all generators, fuel tanks, battery systems, electrical infrastructure and related improvements associated with the abandoned use. Such financial security shall be maintained until the completion of the removal activities described herein, and may be reviewed periodically by the city to ensure that the amount of security remains adequate to secure removal. The financial security must be in the amount equal to 100% of the total estimated cost of decommission and restoration. The financial security must be posted prior to commencement of any land development activities, earth disturbance, and/or issuance of building permits.

(k) Heat Mitigation.

[1] A Thermal Impact Mitigation Plan shall be submitted, including, at a minimum, strategies for waste heat reuse or dissipation. Passive cooling strategies such as cool roofs, natural vegetation (green roofs/ shade trees) and light-colored exterior walls are encouraged to mitigate urban heat islands and reduce energy consumption. The Plan will be prepared and certified by a professional engineer.

(l) Emergency Management.

[1] The applicant shall submit an Emergency Response Plan (ERP) prepared by a qualified professional. The ERP shall:

- [i] Be reviewed and accepted by the City Fire Department and Lehigh County Office of Emergency Management as part of the special exception and/or land development process.
- [ii] Include detailed procedures for fire suppression, containment, ventilation, and evacuation;
- [iii] Include an evaluation of the access roads and hydrant locations within the site to ensure suitable access for emergency equipment within the site;
- [iv] Ensure that all first responders receive adequate training specific to the installed system;
- [v] Include provisions for annual fire safety inspections demonstrating compliance with fire safety standards to be performed by a qualified professional on behalf of the data center.

[2] Any Data Center use proposing battery storage or any other device or group of devices capable of storing energy in order to supply electrical energy at a later time, whether the energy is stored for use on-site or off-site, shall demonstrate compliance with National Fire Protection Association (NFPA) Standard 855, Installation of Stationary Energy Storage Systems, or similar standards and must include fire suppression systems designed specifically for battery storage.

[3] No Data Center shall be approved unless the applicant demonstrates that procedures for fire suppression, containment, ventilation, and evacuation are sufficiently protective of public health, safety and welfare.

(m) Aesthetics.

[1] Any data center use building façade that faces a public street, MX-N-, GX-N-, or N-zoned lot, existing residential use, or other frontages per 660-18.J(9) must incorporate at least two of the following design elements every 150 horizontal feet:

- [i] A change in building material, pattern, texture, or color;
- [ii] A change in building height;
- [iii] Building step-backs or recesses having a minimum depth of five (5) feet.

(n) At least one (1) off-street loading space shall be provided for a data center.

(o) Maximum building height of 50 feet.

[1] On lots 15 acres or larger in area, the building height may be increased to a maximum of 70 feet through a special exception approval and in accordance with the supplemental workshop building regulations of 660-32.H(1)(a).

- (p) All required plans, studies, evaluations, assessments, and strategies shall be submitted together with the zoning permit application. If a land development application is submitted prior to the zoning permit application, such documents shall be submitted together with the land development application. Such documents shall be subject to review and comment by the City. The City shall have the right to require supplements and/or amendments to such documents based upon comments by the City prior to any zoning approval.
- (q) Applications for approval of data center use projects shall be referred to the Allentown City Planning Commission (ACPC) and Allentown Environmental Advisory Council (AEAC), for review and comment. Feedback from the ACPC, AEAC, and (when requested) Allentown Shade Tree Commission, shall be reviewed by the applicant and incorporated into any necessary mitigation strategies.
- (r) All documents required by this section, 660-38.H, must be reviewed and accepted by the City Engineer or third-party consultant. When the city determines that competent and expeditious review of the documents detailed in this section require review by a third-party consultant, the applicant is responsible for reasonable fees associated with such third-party consultants.

Legislative Template

- What department or bureau is this bill originating from? Where did the initiative for the bill originate?
 - City Council/ CED. The bill will amend the Zoning Ordinance to add a public notice requirement for certain industrial uses and amend the regulations for the Data Center Use, which was adopted on June 17, 2026.
- Summary and facts of the bill.
 - The purpose of this amendment is to require additional public notice for certain industrial uses and to amend the regulations for the Data Center Use by removing the use from the IG zone, adjusting setback requirements, and adding details to the Noise and Vibration and Electronic Waste sections of the code to further mitigate any potential negative effects on public health, safety and welfare.
- Purpose – Please include the following in your explanation:
 - a. What does the bill do? What are the specific goals or tasks the bill seeks to accomplish?
 - This amendment is proposed to ensure the City has additional regulations in place for the data center use that will mitigate any potential negative effects on public health, safety and welfare.
 - b. What are the benefits of doing this?
 - Any potential negative effect on public health, safety and welfare will be mitigated by the regulations proposed by this amendment.
 - c. How does this bill relate to the City's vision/mission/priorities?
 - This ordinance aligns with the city's mission of public health, safety and welfare.
- Financial Impact – Please include the following in your explanation:
 - a. Cost (initial and ongoing)
 - There will be no changes to the current budget.
 - b. Benefits (initial and ongoing)
 - The City and staff will be better equipped and prepared to handle potential issues that may arise due to this use.
- Funding Sources – Please include the following in your explanation:
 - a. If transferring funds, please make sure to give specific account names and numbers. If appropriating funds from a grant, please list the agency awarding the grant.
 - There will be no transfer of funds related to this amendment.
- Priority status – Are there any deadlines to be aware of?

- Data center uses are rapidly expanding throughout the Lehigh Valley.
- Why should Council unanimously support this bill?
 - Council should unanimously support this bill to ensure the City has additional regulations in place to mitigate any potentially negative impacts of this emerging use type.

Exhibit A

ZONES																		Description & Add'l Regulations		
MX-				GX-			N							I			P			
D	C	S	N	D	C	N	NX	N1	N2	N3	N4	N5	IX	IG	IM	P1	P2			
													-	-	-	-	-	660-36.A		
							-	-	-	-	-	-	-	-	-	-	-	660-36.A		
Regulated by building type (see Article 4)																				
Regulated only within the Student Residence Overlay (SRO) zone (see 660-10)																		660-36.B		
-	-	-	-											-	-	-	-	-	660-36.C	
-	-	-	-	-							-	-	-	-	-	-	-	-	660-36.C	
			-			-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-				-							-	-	-	-	-	-	-		660-36.D	
-				-							-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-		660-36.D	
-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-	660-37.A	
							-	-	-	-	-	-	-				-	-	660-37.B	
			-			-	-	-	-	-	-	-	-	-	-	-	-		660-37.B	
-	-		-	-	-	-	-	-	-	-	-	-	-	-		-	-		660-37.B	
-	-	-		-									-	-	-	-	-	-	660-37.C	
-	-	-	-	-				-					-	-	-	-	-	-	660-37.C	
							-	-	-	-	-	-	-				-		660-37.C	
							-	-	-	-	-	-	-				-		660-37.C	
							-	-	-	-	-	-	-	-	-	-	-		660-37.D	
							-	-	-	-	-	-	-		-	-	-	-	660-37.D	
							-	-	-	-	-	-	-				-	-	660-37.D	
							-	-	-	-	-	-	-		-	-	-		660-37.D	
							-	-	-	-	-	-	-				-	-	660	

Skills Game	●	○	○	-	○	-	-	-	-	-	-	-	-	-	-	-	-	660-37.G
Indoor, Small	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	●	660-37.G
Indoor, Large	●	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	●	660-37.G
Outdoor	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	●	660-37.G
Funeral & Mortuary Service	-	-	●	-	-	●	○	-	-	-	-	-	-	-	-	-	-	660-37.H
Lodging																		
B & B Inn	-	-	-	-	-	●	●	-	-	-	-	-	-	-	-	-	-	660-37.I
Hotel/Motel	●	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.I
Marina	-	-	-	-	-	●	-	-	-	-	-	-	-	-	-	-	●	660-37.J
Office																		
Admin., Business or Professional Office	●	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	●	660-37.K
Medical Lab or Health-Related Service	●	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	-	660-37.K
Financial Service	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	○	660-37.K
Service Office	●	●	●	-	●	●	-	-	-	-	-	-	-	●	●	●	-	660-37.K
Walk-In Office	●	●	●	●	●	●	●	-	-	-	-	-	-	-	-	-	-	660-37.K
Retail Sales																		
Indoor	●	●	●	●	●	●	○	-	-	-	-	-	-	●	-	-	●	660-37.L
Outdoor	-	○	○	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.L
Self-Service Storage	-	-	-	-	-	○	-	-	-	-	-	-	-	○	-	-	-	660-37.M
Vehicle Sales & Service																		
Personal Vehicle Repair & Maintenance, Minor	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
Personal Vehicle Repair & Maintenance, Major	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-37.N
Personal Vehicle Sales and Rentals	-	-	●	-	-	-	-	-	-	-	-	-	-	-	-	-	-	660-37.N
Fueling Station	-	-	●	-	-	-	-	-	-	-	-	-	-	●	-	-	-	660-37.N
MANUFACTURING & INDUSTRY (See 660-38)																		
Artisan Manufacturing	●	●	●	○	●	●	○	-	-	-	-	-	-	●	●	●	-	660-38.A
Low-Impact Manufacturing	●	●	●	-	●	●	-	-	-	-	-	-	-	●	●	●	-	660-38.B
Moderate-Impact Manufacturing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.C
High-Impact Industry	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	-	660-38.D
Industrial Service	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.E
Recycling Use																		
Recyclable Material Collection	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.F
Recyclable Material Processing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	●	-	660-38.F
Warehousing & Distribution																		
Indoor, Up to 50,000 sq. ft. GFA	●	●	●	-	●	○	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Indoor, More than 50,000 sq. ft. GFA	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	●	-	660-38.G
Outdoor, More than 50,000 sq. ft. (site area)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	●	-	660-38.G
Outdoor Industrial Sites	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	-	660-19.C
Data Center Use	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	○	-	660-38.H
CIVIC & INSTITUTIONAL (See 660-39)																		
Cemetery	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	●	660-39.A
College or University	●	●	●	-	●	●	-	-	-	-	-	-	-	-	-	-	●	660-39.B
Community Assembly	●	●	●	○	●	●	○	-	-	-	-	-	-	-	-	-	●	660-39.C
Detention or Correctional Facility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	○	660-39.D
Governmental Uses	●	●	●	●	●	●	●	-	-	-	-	-	-	●	-	-	●	660-39.E
Hospital	-	●	●	-	-	○	-	-	-	-	-	-	-	-	-	-	●	660-39.F
Library or Cultural Exhibit	●	●	●	○	●	●	○	-	-	-	-	-	-	-	-	-	○	660-39.G
Parks and Open Space	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.H
School	●	●	●	○	●	○	○	-	-	-	-	-	-	-	-	-	●	660-39.I
Transportation Facilities	-	-	●	-	●	-	-	-	-	-	-	-	-	-	●	●	-	660-39.J

Minor	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	660-39.K	
Major	○	○	○	○	○	○	○	○	○	○	○	○	○	●	●	●	○	○	660-39.L

[illegible][illegible][illegible]

Key (see 660-34.B): ● = permitted | ○ = special exception approval required | ⊙ = permitted above, below, or at rear of ground story

● = permitted in limited area | ● = special exception on mixed-use corridor | - = prohibited

Exhibit D



Allentown Environmental Advisory Council

Kyle Ropski, *Chair*
Tinku Khanwalker, *Co-chair*
Peter Dent
Craig Beavers
Brandon Swayser
Susan Gilbert Zencka
✉ atowneac@gmail.com

June 22, 2026

Allentown City Council
435 Hamilton Street
Allentown, PA 18101

Re: Priority Zoning Ordinance Amendments - Data Center Use

Dear Mayor Tuerk and Members of Allentown City Council:

On March 23, 2026 the Allentown EAC (“AEAC”) submitted a letter to you in support of the final proposed language of Bill 20-2026 amending Chapter 660 of the Zoning Ordinance to define and regulate Data Center Use. On Wednesday June 17, 2026 the Allentown City Council voted to pass Bill 20-2026. Our support for the final proposed language of Bill 20-2026 was based on our review of best practices at that time in municipal zoning regulation with respect to data centers.

In the last few months, best practices around municipal regulation of data centers has evolved and public interest has rapidly grown. During the discussion related to this piece of legislation, there was an unprecedented level of public engagement and commentary.

Thanks to the Muhlenberg College Office of Community Engagement, the AEAC has a summer intern. They produced an analysis and review of public comment related to Bill 20-2026. Its purpose is to document and communicate public input to AEAC members and other interested parties. The content and specific wording reflects the perspectives and themes expressed by commenters and does not represent the official position, findings, or recommendations of the AEAC or the City of Allentown. This analysis document is included in “Appendix A”.

In light of these developments and engagement, the AEAC is submitting this supplementary letter in response to public commentary and to indicate our priorities for proposed revisions to the Zoning Ordinance related to Data Center Use.

Priority 1 - Use and Location
Priority 2 - Operational Accountability
Priority 3 - Operational Impacts
Priority 4 - Resource Consumption

Priority 1 - Use and Location

- a) Industrial Manufacturing (IM) / Industrial General (IG) Districts
- b) The Setback Requirement

Consistent with the comments provided in the AEAC's previous recommendation letter¹, public feedback received throughout the City's review of data center regulations has repeatedly emphasized the importance of carefully evaluating where data centers may be located and how they relate to surrounding neighborhoods. Numerous individuals expressed support for limiting data center development to exclusively the Industrial Manufacturing (IM) District rather than permitting the use in both the Industrial Manufacturing (IM) and Industrial General (IG) Districts. There was also substantial public comment advocating for increased setback requirements between data center facilities and sensitive receptors such as residences, schools, child care facilities, parks, and other locations where vulnerable populations may be present.

As noted in the Lehigh Valley Planning Commission (LVPC) Industrial Land Use Guide² setbacks should be sufficient to protect neighboring uses from adverse impacts but should not be so restrictive as to create a de facto exclusion of the use. In particular, the City should consider whether setback requirements should be expanded to provide additional protection for sensitive receptors. While the AEAC continues to support the Special Exception review process and the ability of the Zoning Hearing Board to impose additional setbacks and mitigation measures based on site-specific conditions and sensitive receptors, the City should also evaluate whether certain protections are appropriate as baseline ordinance requirements rather than relying solely on case-by-case review. In regards to specific zoning districts, such as IM or IG, it is outside of our scope and we would defer to the Allentown City Planning Commission (ACPC).

The AEAC's priority is to ensure that data center development is directed to the most appropriate industrial locations and that clear, enforceable setback standards are established to provide the maximum reasonable protection for surrounding neighborhoods and sensitive land uses **while avoiding a de facto exclusion of the use.**

Priority 2 - Operational Accountability

- a) Decommissioning Protocols
- b) Public Transparency

Public feedback received throughout the review of data center regulations emphasized the importance of long-term accountability and public transparency. Community members expressed concerns regarding the decommissioning of data center facilities, including the removal and disposal of equipment, site restoration, and the potential for costs to ultimately fall upon the

¹  260205_EAC_REC_DataCenterAmendment.pdf

²<https://lvpc.org/community-plans-%2B-guides>

community if a facility is abandoned. Public comments also highlighted the importance of ensuring that information related to proposed projects and their impacts is readily accessible to residents, including in all languages commonly spoken within the community.

The AEAC recognizes that current regulations as established in Bill 20 include important accountability measures. For example, there are requirements for an Electronic Waste Plan outlining procedures for the safe removal, recycling, and disposal of server infrastructure, batteries, hazardous materials, and related equipment when a facility is updated or decommissioned. Current code also requires numerous plans, studies, and assessments to be submitted and reviewed as part of the approval process. However, the City may wish to evaluate whether additional measures, such as financial security for decommissioning (like a posted bond), enhanced public reporting requirements, document accessibility standards, and community notification procedures, would further strengthen long-term accountability and transparency. Currently, Data Centers are defined as Special Exception Uses, which require mailed public notice and posting for submitted projects to adjacent property owners. We would recommend that, to properly meet the needs of the community, the City should require Applicants to notify more than adjacent property owners, including providing notice in Spanish.

The AEAC's priority is to ensure that data center facilities remain accountable to the community throughout their entire lifecycle by promoting effective decommissioning standards, meaningful public transparency, and accessible information for all residents.

Priority 3 - Operational Impacts

- a) Noise and Vibration
- b) Heat Mitigation

Public feedback received throughout the review of data center regulations consistently identified noise, vibration, and heat generation as concerns that could affect the quality of life of nearby residents. Community members frequently expressed concerns regarding continuous equipment noise, low-frequency hums, and the potential impacts of large facilities on surrounding neighborhoods.

The AEAC recognizes that current regulations as established in Bill 20 include substantial requirements intended to address these concerns, including compliance with Chapter 400 (Noise), sound studies, post-construction noise verification, vibration studies, and Thermal Impact Mitigation Plans. The ordinance also specifically requires evaluation of persistent tonal sounds and low-frequency ambient noise, concerns that were highlighted by both the public and the AEAC. We recommend a thorough review of available best practices and emerging research related to operational impacts and defined standards for heat mitigation, including heat

mitigation strategies identified in the EPA Heat Island Community Actions Database³. The City may also wish to evaluate whether studies and mitigation recommendations related to noise, vibration, heat, and other operational impacts should be conducted or reviewed by independent qualified professionals to further strengthen public confidence in the review process. **We recommend the City establish clearly defined thresholds, where not already defined, for all studies that are required for submission by the Applicant** (such as post-construction noise verification, vibration studies, Thermal Impact Mitigation Plans, etc.).

The AEAC's priority is to ensure that operational impacts, including noise, vibration, and heat generation, are thoroughly evaluated and effectively mitigated to protect the health, comfort, and quality of life of surrounding neighborhoods.

Priority 4 - Resource Consumption

- a) Water Use
- b) Energy Use

Public feedback received throughout the review of data center regulations frequently identified water and energy consumption as significant concerns. Community members expressed concerns regarding the potential strain that large-scale data centers may place on local utility infrastructure, water resources, and electrical generation systems, as well as the potential impacts on greenhouse gas emissions, energy reliability, and long-term environmental sustainability. There was also commentary on the lack of requirements for the use of renewable energy.

The AEAC recognizes that many aspects of utility planning, service provision, rates, and reliability are regulated by utility providers and the Pennsylvania Public Utility Commission (PUC), limiting the City's direct authority in these areas. The AEAC also recognizes that current regulations established under Bill 20 include substantial requirements intended to address these concerns, including Water Utilization Reports, Energy Management Plans, utility capacity reviews, and infrastructure improvement requirements where existing systems are determined to be insufficient. As part of the AEAC's purpose statement, we support the use of renewable energy and incentivization of renewable energy, but cannot opine as to the City's ability to require it.

The Energy Management Plan must be prepared and certified by a professional engineer. The ordinance also requires documentation from the applicable electric service provider demonstrating that sufficient capacity exists to serve the facility if it will be connected to the electric grid, and requires the applicant to fund any necessary system improvements or infrastructure upgrades identified as necessary to provide adequate service. This requirement is in line with the provisions of PPL's tariff which imposes costs related to any system

³ <https://www.epa.gov/heatislands/heat-island-community-actions-database>

improvements for data centers on the data center applicant. For more information from PPL see this link:

<https://www.pplelectric.com/sitecore/content/ppl-jss-app/home/Landing-Pages/Data-Centers>

The Water Utilization Reports will detail projected water use, water sources, discharge volumes, cooling system efficiency, and compliance with applicable stormwater regulations. Applicants must demonstrate that adequate water and wastewater infrastructure exists to support the facility, fund any necessary system improvements, and, where nonpublic water sources are proposed, evaluate potential impacts on groundwater, surface water, and nearby wells through review by applicable regulatory agencies such as the Delaware River Basin Commission and the PA Department of Environmental Protection.

We recommend the professional engineer be a design professional with expertise appropriate to the proposed project and should have no financial interest in the project. We also recommend, to ensure minimization of water use in proposals, the City remain informed in its understanding of emerging technologies and should encourage water reuse and the usage of graywater and partially treated wastewater.

The AEAC's priority is to ensure that water and energy demands associated with data center development are thoroughly evaluated, transparently disclosed, and appropriately mitigated to protect community resources, utility reliability, environmental sustainability, and the City's long-term climate objectives.

As an advisory body, the AEAC's role is to identify environmental issues, research solutions, and make recommendations to City Council and Administration. We appreciate the opportunity to continue to provide input on this important amendment to the City's zoning ordinances.

Sincerely,

The Allentown EAC

Appendix A

Disclaimer:

The following section was prepared by an AEAC intern as part of a review and analysis of public comments in regard to Data Center Regulations and Bill 20. The content is intended solely as a summary of themes, perspectives, concerns, and suggestions expressed by members of the public. It does not represent the positions, findings, recommendations, or official views of the AEAC, or the City of Allentown. The inclusion of any comment, viewpoint, or recommendation in this summary should not be interpreted as endorsement by the AEAC. The purpose of this section is to document and convey public input as received.

Bill Strength and Enforcement

- Replace all vague, discretionary terms like "encourage" or "recommend" with strict, mandatory language such as "shall" and "must."
- Establish clear, enforceable performance standards rather than generalized, non-binding recommendations. Set S.M.A.R.T. goals.
- Implement meaningful financial and operational penalties for non-compliance to guarantee developer accountability (not just a small fine considered a cost of business).
- Require annual compliance reporting, continuous monitoring post-construction, and third-party verified technical reviews. Require developers to pay for all studies, reports, assessments, and reviews mentioned throughout this document.
- Require that all requested plans and supporting documents for data center proposals be submitted before any approval or vote.

Zoning

- Limit data center construction strictly to Industrial Manufacturing (IM) districts.
- Require conditional approval via special exception rather than "by right."
- Increase mandatory setbacks from 200 feet to several thousand feet away from sensitive uses, including homes/apartments/residential areas, schools, centers for those with special needs, daycares, hospitals, parks, places of worship, senior centers, etc.
- Close loopholes that permit warehouse conversions to evade updated regulations.
- Prevent the negative effects of data centers from disproportionately affecting minority groups and the working class.
- Consider opening up zoning for data centers underground and only allowing them there.

Environmental and Public Health Research

- Mandate comprehensive, independent Environmental Impact Assessments (EIAs) (some also suggested Pennsylvania DEP studies) to evaluate cumulative and long-term impacts on:
 - Air, water, groundwater, and soil quality.
 - Stormwater management and local wildlife/habitat disruption.
 - Heat island effects and localized climate impacts.
- Study how the data center will affect the above items and the noise concerns listed below both in isolation and as contributing to the collective environment (e.g. consider the joint effects of airport noise and data center noise for the people in an area near both in addition to just how the data center will increase noise levels).
- Commission long-term public health studies to investigate risks of cancer, birth defects, and developmental disorders near existing data centers. Also specifically study the public health risks for children, senior citizens, disabled citizens, and people especially vulnerable to reduced air quality.

Noise

- Require ongoing post-construction noise testing. Studies must evaluate low-frequency noise, infrasound, and physical vibration alongside standard audible noise, utilizing both A-weighted and C-weighted sound metrics.
- Explicitly protect and recognize the significant impacts of industrial noise on children, seniors, schools, and individuals with autism, ADHD, PTSD, anxiety disorders, sensory disorders, or hearing impairments.
- Establish max allowable decibel limits and a public complaint process for mitigation.

Water, Energy, and Heat

- Mandate water conservation through water recycling systems or closed-loop cooling. Consider requiring cooling systems to utilize rainwater.
- If possible, set limits on water and electricity usage, local heat generated, and pollution.
- Specify what the thermal impact mitigation plan must entail and take measures to ensure heated water from data centers isn't dumped into rivers and streams.
- Develop a plan to prevent data centers from driving up residential utility costs. Require developers to fully fund all new/upgraded utility infrastructure associated with the development. Also ensure taxpayers don't lose power or water because of centers.
- Mandate or heavily incentivize the construction of dedicated renewable energy sources to offset grid strain. Specify how much of energy use must be renewable.
- Require annual, verifiable public reporting of water usage, energy consumption, and renewable energy metrics. Have PPL—data center agreements be made public.

Emergency and Decommissioning Protocols

- Enforce strict Tier 4 diesel standards for backup generators, regulate large-scale onsite fuel storage, and mandate robust spill-prevention protocols.
- Identify, track, and regulate all toxic fire suppression chemicals and hazardous materials stored or generated onsite.
- Guarantee that local fire departments receive the specialized training and equipment necessary to combat complex lithium-ion battery and high-voltage electrical fires. Mandate co-authored emergency response planning before operations begin.
- Mandate comprehensive decommissioning and site-restoration plans (including soil remediation and phytoremediation planning). Developers must fund escrow accounts or remediation trusts prior to operation (and have them pay percentage of revenue into it every year) to ensure cleanup and electronic/hazardous waste disposal costs never fall on taxpayers. Alternatively, someone suggested forcing developers to commit to stay for a set period of time.

Neighborhood Impacts

- Specify landscaping requirements by describing plant sizes and intervals (prioritize native species). State that the Shade Tree Commission has the decision making power.
- Enforce strict controls to mitigate external light pollution, traffic congestion, heat generation, wildlife disruption, and negative impacts on local property values and general quality of life.

Public Transparency

- Make all studies and environmental monitoring data fully transparent and open to public.
- Require comprehensive conflict-of-interest disclosures for all engineering and environmental consultants involved in the project.
- Improve public notification procedures for data centers (including electronic and social media notification) and ensure all meetings, digital documents, and website information are highly accessible even in other languages (especially Spanish).
- Make the public aware of data center applications farther in advance, provide more opportunities for the public to give input (including after working hours), and write in the bill when you will notify the public of applications. Ensure citizens on all sides of the city are informed on matters related to data centers in Allentown.
- Require developers to give public notice of their development a specified number of days in advance to each household showing direct community impacts in plain language and with multilingual outreach.

Exhibit E



CHRISTINA "TORI" MORGAN
Chair

ARMANDO MORITZ-CHAPELLIQUEN
Vice Chair

PHILLIPS ARMSTRONG
Treasurer

BECKY A. BRADLEY, AICP
Executive Director

June 29, 2026

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

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

Dear Ms. Gomez,

The Lehigh Valley Planning Commission (LVPC) has reviewed the City of Allentown's proposed zoning ordinance amendment, Bill 52-2026. The amendment removes data centers as a special exception use from the Industrial - General (IG) Zoning District, adds public notice requirements for industrial uses, and strengthens the supplemental regulations for Data Center Uses including increasing setback requirements and minimum lot area, adding additional details to the sound study requirement, and adding requirements for decommissioning and site restoration.

The LVPC appreciates the City's continued work to refine its recently adopted data center regulations and incorporate public comment. Overall, the proposed zoning ordinance amendment represents a thoughtful and substantial strengthening of the City's data center regulations. The amendment expands public transparency and strengthens expectations for applicants as the City looks to mitigate the impacts of future data center proposals, which aligns with *FutureLV: The Regional Plan* by 'supporting evolution and adaptability of government' (of Policy 1.1).

The LVPC offers the following comments for the City's consideration:

Public Notice and Public Information

The proposed requirement for an applicant-hosted public meeting and project website is a strong addition, particularly for large industrial uses that may generate substantial public impacts. These requirements will help residents, City officials and reviewing agencies better understand the nature of a proposed development before formal action is taken. The LVPC recommends clarifying that the applicant-hosted public meeting is informational and does not replace any public hearing, public notice or decision-making requirements otherwise required by the Pennsylvania Municipalities Planning Code or the City's ordinances.

The LVPC also recommends requiring that the project website remain active for an additional period beyond final land development approval to ensure that information remains publicly accessible during the period when impacts may become most visible to the community.

Setbacks and Minimum Lot Area

The proposed increase to a 500-foot separation from residential, civic, institutional, child care and neighborhood-oriented zoning areas is a strong compatibility standard. The LVPC

recommends clarifying that the 500-foot separation applies to both the principal data center building and accessory equipment areas, including generators, cooling systems, fuel storage, battery systems, electrical infrastructure and accessory structures, because these accessory components can be among the most impactful parts of a data center site and should be included clearly within the setback framework. The proposal to increase minimum lot area from five to eight acres helps ensure adequate separation from neighboring properties.

Noise

The proposed amendment adds detail and specificity to the requirement that a sound study be provided, including that the sound study assess a full spectrum (dBA + dBC), that it be provided by a third-party consultant, and additional criteria. Adding detail to the sound study requirement helps ensure that the City receives all necessary information about the project for review

Decommissioning

The requirement that a Decommissioning and Site Restoration Plan be provided is a strong additional provision that many other municipalities are also adding or considering to address the long-term land impacts of development. Including provisions for decommissioning and site restoration 'promotes sustainable stewardship of natural lands, water resources and open space' (of Policy 3.1).

The proposed requirement for financial security takes this requirement a step further than other municipalities have taken, and the LVPC recommends the City verify that this provision is administrable and legally defensible without singling out a particular land use for more stringent requirements than other land uses with similar impacts are subject to.

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: David Petrik, Deputy Director of Public Works; Melissa Velez, Senior Planner; Brandon Jones, Planner; Joseph Millick, City Engineer; Brian Hite, Assistant Planner.