



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.