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April 14, 2026

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

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

Dear Ms. Gomez,

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

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
April 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	April 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The application proposes to amend the Allentown Zoning Ordinance to include definitions and regulations for Data Centers in the Manufacturing and Industry Group and to amend the Use Table to add Data Centers in the Industrial General (IG) and Industrial Manufacturing (IM) as a special exception use.

LVPC supports Allentown's proactive effort to address an emerging land use before proposals arrive. That approach is consistent with *FutureLV: The Regional Plan's* direction to guide the location and intensity of development, match development intensity with infrastructure capacity, and encourage an efficient development process responsive to regional needs ([of Policy 1.1](#)).

Allentown's proposed ordinance both aligns with best practices for regulating data centers and contains opportunities to improve the ordinance to support public health, safety and welfare.

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

- **Special Exception Use:** Permitting data centers as a special exception use enables the City to establish substantial submission criteria and thoroughly evaluate project impacts on a case-by-case basis. Including review and comment from the Allentown Planning Commission (ACPC), Allentown Environmental Advisory Council (AEC), and Allentown Shade Tree Commission (ASTC) supports 'an efficient development process that is responsive to regional needs' and helps to 'facilitate discussion among stakeholders and appointed officials' ([of Policy 1.4](#)).
- **Electronic Waste:** The ordinance includes procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which aligns with the goal of *FutureLV* to 'provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling' ([of Policy 3.2](#)).
- **Heat Mitigation:** The Thermal Impact Mitigation Plan requires applicants outline strategies for waste heat reuse or dissipation, which minimizes environmental impacts of development to protect the health, safety and welfare of the public' ([of Policy 3.2](#)). Encouraging cool roofs, green roofs/shade trees, and light-colored exterior walls help to mitigate heat island effect and incorporate 'sustainable building, site design and community design practices' ([of Policy 3.4](#)).
- **Environmental Impact:** The environmental impact assessment requires applicants to evaluate impacts of data center developments and to propose mitigation strategies for any adverse effects to air, soil, water quality, groundwater sources, wildlife and habitat, and greenhouse gas emissions. These are to be modelled under regular and adverse conditions such as drought, extended power outages and extreme heat. The requirement for an environmental impact assessment is a strong feature. Requiring analysis of impacts of development on critical environmental features and alternatives serves to 'preserve natural resources in the land development process' and promotes stewardship of the City's and the region's natural resources ([of Policy 3.1](#)).
- **Water and Sewer:** The proposed ordinance includes substantive utility and infrastructure review. Requiring evidence of water and sewage service, a water resources impact study, DRBC and DEP review where applicable, and an electric interconnection agreement reflects *FutureLV*'s emphasis on matching development intensity to available infrastructure ([of Policy 1.1](#)) and 'minimizes impacts of development to protect the health, safety and welfare of the public' ([of Policy 3.2](#)). The City may wish to include a statement indicating preference for closed-loop cooling systems that recirculate and reuse water. If so, definitions for closed-loop cooling and/or once-through cooling systems should be included in the definition section of the City's ordinance.

- **Aesthetics:** The aesthetic standards included in the ordinance help to minimize the visual impacts of the scale of buildings on neighboring properties and 'promote context-specific design solutions' ([of Policy 5.4](#)).

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

- **Power Supply:** The LVPC recommends adding requirements for any backup power equipment, such as minimizing air pollutant emissions in accordance with EPA Tier 4 emissions standards and requiring annual testing to minimize air quality impacts ([of Policy 3.2](#)). Detailed specifications on emissions controls and fuel storage safety measures such as spill-prevention and secondary containment should also be included to ensure public health and environmental safety. The LVPC also recommends including requirements for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. The technology facility industry is moving in the direction of on-site generation, and the City can further 'integrate efficiency measures and emerging technologies', 'improve the utility and mobility infrastructure of the region' ([of Policy 1.1](#)), and 'minimize and mitigate the impacts of utility expansion associated with technological advancements' ([of Policy 3.2](#)).
- **Noise:** When proper noise abatement measures are taken by the developer (such as installing sound attenuation walls), noise level at the property line can be significantly reduced. Data Centers are operational 24/7, so noise levels are unlikely to change throughout the day unlike other kinds of industrial uses. The LVPC recommends that the City consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential or other non-industrial uses ([of Policy 3.2](#)). Noise types e.g. ambient noise should also be defined in the City's Noise Ordinance.

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

Sincerely,



Mary Grace Collins
Community and Regional Planner

cc: Jesse Sadiua, Chief Planner; Melissa Velez, Senior Planner; Brandon Jones, Planner