



Allentown Environmental Advisory Council

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Maria Ocasio, *Past chair*
Peter Dent
Craig Beavers
Brandon Swayser
Susan Gilbert Zencka
✉ atowneac@gmail.com

March 23, 2026

Allentown City Council
435 Hamilton Street
Allentown, PA 18101

Re: Zoning Ordinance Amendment – Data Center Use (Bill 20 – 2026)

Dear Mayor Tuerk and Members of Allentown City Council:

The Allentown Environmental Advisory Council (AEAC) has reviewed the final proposed language of Bill 20 – 2026, amending Chapter 660 of the Zoning Ordinance to define and regulate Data Center Use.

We appreciate the opportunity to provide advisory input during the development of this ordinance and recognize the Planning Bureau's responsiveness to several of the environmental considerations previously identified by the AEAC.

In particular, we acknowledge the inclusion and strengthening of provisions related to:

- Environmental Impact evaluations addressing air quality, water quality, groundwater, wildlife, and greenhouse gas emissions
- Requirements for Water Utilization Reports and documentation of infrastructure capacity
- Energy Management Plans and encouragement of renewable or clean energy sources
- Noise studies, including post-construction "as-built" sound verification
- Heat mitigation strategies
- Landscaping and buffering requirements

We also appreciate that the final ordinance expressly provides for referral of Data Center Use applications to the Allentown City Planning Commission and the AEAC for review and comment. This formal inclusion supports a transparent and comprehensive evaluation process and reinforces the City's commitment to environmental consideration in land use decisions.

The AEAC views the final ordinance language as establishing a structured framework to evaluate potential environmental impacts associated with data centers and to require mitigation where appropriate. The inclusion of professional studies, agency review, and third-party

consultation where necessary reflects an effort to ensure that impacts to infrastructure, neighborhoods, and natural resources are assessed prior to approval.

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 collaborative process that has occurred in the drafting of this amendment and the incorporation of environmental safeguards into the final language.**

Thank you for your time and consideration. We look forward to continued collaboration on building a greener, more resilient Allentown.

Sincerely,

The Allentown EAC