BERKS COUNTY
Planning Commission

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August 21, 2026

Muhlenberg Township Board of Commissioners
210 George Street
Muhlenberg, PA 19605

Subject: Proposed Zoning Ordinance Text Amendment
Project ID #:29 42 20260724 115
Text Section(s): Article II Section 355-11, Section 605

Dear Commissioners:

In accordance with the provisions of the Pennsylvania Municipalities Planning Code, the Berks County Planning Commission (BCPC) has reviewed the proposal to amend Muhlenberg Township's Zoning Map and Zoning Ordinance to add a Data Center Overlay (DCO) District and to provide regulations for Data Centers.

A. Conformity with the County Comprehensive Plan:

1. Exhibit A: The provided map does not appear to be of the proposed Data Center Overlay (DCO) District area in Muhlenberg Township, but rather Cumru Township's overlay district for the same use. Therefore, staff was unable to verify general consistency with the Berks County Comprehensive Plan 2030.

B. General Comments:

1. Section 605 (A) 1: The accompanying narrative describes an overlay in the I1 and I2 Districts within the Township; will this apply to the just a portion or portions of the identified industrial districts? If the DCO overlay applies to the totality of the I1 and I2 districts, staff suggests incorporating this use within those districts' regulations in lieu of an overlay district. If the DCO is only spanning portions of those districts, staff recommends updating this language to reflect that mapping.
2. Section 605 (D) 1: Staff notes that the proposed definition of data center is very generalized. Staff suggests including language that:
    i. further defines the use as including cryptocurrency mining, blockchain transaction processing, server farms, and other related activities.
    ii. excludes servers, computers, telecommunications equipment, et cetera that is secondary and incidental to a permitted use on a property.
3. Section 605 (E) 1 b: Staff suggests clarification on text regarding the width of the property at the building setback line. If the front, rear, and side yards require 50ft setbacks, it would seem that the minimum lot width at the building setback would not be accounting for space for the building width itself.

4. Section 605 (E) 2 a, b, c: Staff recommends clarifying that these figures are minimum setbacks.
5. Section 605 (E) 2 f iv: Consideration should be given to the minimum height of screen plantings both at the time of installation as well as at maturity.
6. Section 605 (E) 2 f: Staff suggests encouraging native plantings wherever possible for screening data centers and the related accessory structures.
7. Section 605 (E) 3 a: The ordinance notes a maximum height of 50ft with the ability to increase the height up to 80ft at the discretion of the Board of Commissioners. It is recommended to establish specific objective criteria for applications proposing building heights that exceed the baseline maximum height of 50ft.
8. Section 605 (E) 5 a I 2: Staff recommends specifying that screenings must fully conceal ground mounted equipment from horizontal sight lines.
9. Section 605 (E) 5 a ii 1: Staff recommends tying minimum height requirements of roof mounted equipment based on the height of the structures in question. This can help conceal larger pieces of equipment that may exceed the proposed 12ft minimum screening requirement, while allowing for less burdensome screenings for potentially smaller, more easily concealed equipment.
10. Section 605 (E) 7 a: When adjacent to a sensitive receptor such as a residential property, staff recommends lowering the maximum decibel level allowed to 55dB(A) for daytime hours and 45dB(A) for nighttime hours and weekends.
11. Section 605 (E) 8, 9: *8. Utility Review* provides guidance for burden of proof from, among others, public water providers to establish capacity for proposed data center applicants. However, *9. Water and Sewer* does not provide any guidelines for data centers wishing to connect to public water. Staff suggests requirements such as (but not limited to):
    i. Developer responsibility for all costs associated with required public water system studies, capacity improvements, or off-site infrastructure upgrades.
    ii. a maximum daily water withdrawal.
    iii. mandatory closed loop cooling systems.
12. Section 605 (E) 9: Staff suggests encouraging data center properties to utilize non-potable, recycled, or reclaimed water when feasible.
13. Section 605 (E) 17: Financial security provisions for the decommissioning of such uses are increasingly becoming common in data center ordinances. Staff suggests consideration for a surety for the decommissioning of a data center (typically equal to between 110-125% of the estimated removal cost).
14. Staff recommends that the municipality review the Berks County Planning Commission's Data Center Advice Document (https://www.berkspa.gov/departments/planning-commission/planning-advice/bcpc-data-center-advice) prior to the adoption of this amendment.

Thank you for the opportunity to comment. If you have any questions regarding this review, please do not hesitate to contact me at lmursch@berkspa.gov or 610-478-6300 ext. 6310. Please note that Section 608 & 609(g) of the Pennsylvania Municipalities Planning Code requires that a copy of a full ordinance enactment, or an amendment enactment be forwarded to our office within thirty days of enactment.

Sincerely,



Laura Mursch Hosie
Intergovernmental Affairs Planner III
Berks County Planning Commission

Cc: Muhlenberg Township Engineer
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