Lehigh Valley Planning Commission

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July 22, 2026

Lori Lambert, Planning and Zoning Secretary
Lehigh Township
1069 Municipal Road
Walnutport, PA 18088

Re: Zoning Ordinance Amendment – Data Centers
Lehigh Township
Northampton County

Dear Ms. Lambert,

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:**
July 21, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	July 23, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The application proposes to amend the Township Zoning Ordinance to regulate Data Centers and associated uses in the Industrial (I) Zoning District in Lehigh Township

Data Centers are essential components of modern technological infrastructure, enabling everyday devices to send and receive digital data needed for video streaming, online shopping, cloud storage, and communicate with other devices. With the growth of digital device and technology usage, digital infrastructure facilities like hyperscale data centers have been expanding across Pennsylvania and are an emerging land use in the Lehigh Valley. When sited appropriately and connected to adequate infrastructure capacity, data centers can support the continuation of the region's technological evolution, economic base and resilience (of Policy 4.1). The Township'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: The Regional Plan* and best practices for regulating data centers:

- **Definitions**: The ordinance distinguishes between Data Centers and Data Center Accessory Uses and includes a definition for Sensitive Receptors. The definition for Sensitive Receptors includes uses such as residences, uses for the care of children or the elderly, and public spaces such as parks, community centers, or places of worship. Providing definitions encourages clarity and minimizes impacts of regionally significant land uses (of Policy 1.4).

- **Conditional Use**: Permitting data centers as a conditional use enables the Township to establish substantial submission criteria and thoroughly evaluate project impacts on a case-by-case basis, supporting 'an efficient development process that is responsive to regional needs' (of Policy 1.4).

- **Buffering**: Large buffer yards and robust plant material regulations for vegetated screening are strong features. These requirements support compatibility with surrounding uses and protection of community character and quality of life by 'promoting context-specific design solutions' (of Policy 5.4). The LVPC recommends specifying that buffer yards and berms be planted with 'native, carbon-sequestering, and climate-adaptive species' as a best practice (of Policy 3.4).

- **Utilities**: The proposed ordinance includes substantive utility and infrastructure review. Requiring evidence of water and sewage service, a water resources impact study, Delaware River Basin Commission (DRBC) and Department of Environmental Protection (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)

    - **Annual Reporting:** The ordinance also requires annual reports from data center operators regarding the quantity of withdrawals, groundwater levels at monitoring wells, precipitation, historical reporting, and any other information the township may need to determine whether data center's water withdrawal adversely impacts water supply. Water withdrawal in Pennsylvania is a highly regulated process and the exact amount of water withdrawn is regulated by the DRBC who tracks the above figures and serves as the primary regulatory authority for the basin. Utilizing the DRBC's specialized hydrologic expertise and data collection provides a scientifically rigorous, third-party framework that effectively complements local oversight while streamlining regulatory processes.

    - **Cooling**: Preference for closed-loop cooling systems 'protects the quality and quantity of surface water and groundwater' (of Policy 3.2). It is recommended that a definition of both Closed-Loop and Once-Through Cooling be included in the Definition section of the ordinance.

- **Emergency Planning**: The provision requiring an Emergency Response Plan aligns with FutureLV by enhancing planning and emergency response capabilities (of Policy 5.1).

- **Environmental Impact Study**: The requirement for an environmental impact assessment is a strong feature. Requiring analysis of nuisance impacts, stormwater, emissions, and energy consumption serves to 'preserve natural resources in the land development process' (of Policy 3.1). Other sections of the ordinance, such as the PNDI study further this policy.

- **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).

- **Parking**: Because data centers typically have fewer employees than other types of industrial uses, applying parking minimum standards that are typical of other types of industrial uses may lead to overbuilt, unused impervious surfaces that exacerbate stormwater impacts. The proposed parking requirement of one and a half spaces per on-site employee or one space per 8,000 square feet, whichever is lesser, supports best-practice contextual standards that match development intensity with appropriate infrastructure capacity (of Policy 1.1) and reduce impervious surfaces and protect water sources (of Policy 3.3).

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- **Traffic Impacts**: The ordinance requires the applicant submit a traffic-impact analysis to address construction-phase traffic and oversized equipment deliveries, which supports the goal of FutureLV to 'minimize quality of life impacts to residents' by ensuring adequate transportation capacity is available (of Policy 2.4).

- **Sustainable Design**: The ordinance also strongly recommend that the developer seek LEED (Leadership in Energy and Environmental Design) certification for the project. The LVPC recommends encouraging the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and 'reduce climate change impacts through mitigation and adaptation' (of Policy 3.4), such as geothermal energy systems, green roofs, solar panels and greywater reuse for irrigation and plumbing.. The developer should also consider adding electrical vehicle charging spaces at the site to serve the residents and 'advance deployment of alternative fueling infrastructure' (of Policy 2.5). Green Roof systems can also provide additional opportunities to 'manage the rate, volume and quality of storm runoff' and 'minimize environmental impacts of development to protect the health, safety, and welfare of the public' (of Policy 3.2)

- **Decommissioning Plan**: The ordinance includes provisions for decommissioning and site restoration, requiring that upon cessation of operation, the owner or operator of the DIF 'shall remove all generators, tanks, battery systems, electrical infrastructure, and related improvements' from the property 'no later than 3 years following the commencement of removal activities'. The decommissioning plan support the goal of FutureLV to 'enhance the long-term viability of assets' and 'provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling' (of Policies 1.3 and 3.2).

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

- **Dimensional Standards:** The ordinance includes a minimum lot acreage of five acres and a height limit of sixty feet (including equipment), alongside a requirement for a fourteen-foot above-grade berm with a minimum top width of ten feet. The LVPC recommends the township consider evaluating these criteria in relation to the standard set for comparable industrial zone uses such as the requirements governing heavy industrial manufacturing, recycling facilities or salvage facilities which would further the shared objective to 'minimize impacts of land uses of regional significance' (of Policy 1.4).

- **Noise**: The proposed ordinance limits the sound generated by a Data Center and any Data Center Accessory Use to a maximum daytime decibel level of 67 dB(A) and a maximum nighttime and weekend decibel level of 57 dB(A). 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 Township consider lowering the permissible maximum decibel level to 55 dB(A) regardless of the time of day, especially where the Data Center borders residential uses or other Sensitive Receptors (of Policy 3.2).

- **Electronic Waste**: The Township may wish to include procedures for safe removal and recycling or disposal of server infrastructure, hazardous materials, batteries, electronic waste, and related products which supports the goal of FutureLV to 'provide environmentally responsible and economical solid, electronic and hazardous waste disposal and recycling' (of Policy 3.2).

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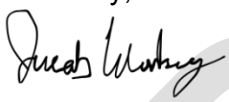
- **Heat Mitigation**: Because data centers generate significant heat, the Township is encouraged to require applicants to submit a Thermal Impact Mitigation Plan that outlines strategies for waste heat reuse or dissipation, which minimizes environmental impacts of development to protect the health, 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).

- **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).

- **Setbacks**: The LVPC recommends setbacks of 200 to 500 feet for hyperscale data center facilities, especially where the data center borders any residential use, sensitive receptor, or public roadway to minimize noise and visual impacts on adjacent property owners (of Policy 3.2).

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)]. Please feel free to reach out with any questions about this review.

Sincerely,



Jacob Weinberg
Community and Regional Planner

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