Lehigh Valley Planning Commission

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April 24, 2026

Lori Seese, Planning and Zoning Administrator
Lower Nazareth Township
623 Municipal Drive, Suite 220
Nazareth, PA 18064

**Re: Data Center Ordinance**
**Lower Nazareth Township**
**Northampton County**

Dear Ms. Seese,

The Lehigh Valley Planning Commission (LVPC) considered the subject application at its Comprehensive Planning Committee and Full Commission meetings, pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC). Meeting details are below:

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

The application proposes to amend the Lower Nazareth Township to include definitions and regulations for Data Centers as a conditional use in the Manufacturing, Extraction and Processing TD-11 Zoning District.

LVPC supports Lower Nazareth'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).

Lower Nazareth'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*:

- **Conditional Use:** Permitting digital infrastructure and hyper digital infrastructure facilities as a conditional use allows the Township to evaluate project impacts on

a case-by-case basis to determine community needs and sensitivities and balance those needs with the demand for modern technological infrastructure. This approach supports an efficient development process that is responsive to regional needs and minimizes the impacts of regionally significant land uses (of Policy 1.4)

- **Noise:** The proposed noise limit of 55 dba at the property line and the required noise/vibration impact studies serve to 'minimize the environmental impacts of development to protect the health, safety and welfare of the public' (of Policy 3.2).

- **Parking:** The proposed parking requirement of one space per on-site employee plus an additional space for every 50,000 square feet of building space supports best-practice contextual standards that match development intensity with appropriate infrastructure capacity (of Policy 1.1) and reduces impervious surfaces and protect water sources (of Policy 3.3).

- **Water and Sewer Impacts:** Requiring evidence of water and sewage service and an electric interconnection agreement reflects *FutureLV's* emphasis on matching development intensity to available infrastructure (of Policy 1.1). The requirement to utilize public water and sewer 'minimizes and mitigates the impacts of utility expansion associated with technological advancements' (of Policy 3.2).

- **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). Specifying that buffer yards and berms be planted with 'native, carbon-sequestering, and climate-adaptive species' is a best practice (of Policy 3.4).

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

- **Aesthetics:** Including aesthetic standards such as facade articulation and roofline and material variation help to minimize the visual impacts of the scale of buildings on neighboring properties and 'promote context-specific design solutions' (of Policy 5.4).

- **Cooling:** The Township requires that all data centers shall utilize closed-loop cooling systems. Preference for closed-loop cooling '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. Details specifying the cooling method proposed should be submitted as part of the conditional use approvals process.

- **Power Supply:** The LVPC recommends that the Township require applicants to document efforts made to maximize the use of renewable and/or clean energy for their electrical and cooling needs, either through on-site generation or verifiable power purchase agreements. These efforts 'reduce greenhouse gas emissions' and 'promote energy conservation' (of Policy 3.4). The LVPC also suggests 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 use of batteries as a source of redundant power should be encouraged wherever possible.

- **On-site Energy Generation**: The LVPC recommends including provisions for on-site power generation uses such as fuel-cell power stations, geothermal, and solar photovoltaics. These are viable alternative and supplemental energy options for technology-based land uses which are highly energy-consumptive. By regulating on-site energy generation, the Township 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).

- **Sustainable Infrastructure/Building Design: T**he LVPC recommends that the Township encourage features like LEED certification and roof-mounted solar energy systems for Data Center buildings, which supports 'sustainable building, site design and community design practices' (of Policy 3.4).

- **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).

- **Environmental Impact:** The Township may consider requiring an environmental impact assessment be submitted by applicants to (1) evaluate impacts of data center developments and (2) to propose mitigation strategies for any adverse effects to air, soil, water quality, groundwater sources, wildlife and habitat, and greenhouse gas emissions. These may be modelled under regular and adverse conditions such as drought, extended power outages and extreme heat. Requiring analysis of impacts of development on critical environmental features builds on the ordinance's existing directive for review from PADCNR to demonstrate no endangered species will be negatively impacted. Including

these features in the ordinance serves to 'preserve natural resources in the land development process' and promotes stewardship of the Township's and the region's natural resources (of Policy 3.1).

- **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).

Municipalities, when considering zoning ordinance amendments developments, 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