Lehigh Valley Planning Commission

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February 27, 2026

Jay Finnegan, Acting Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

Re: Data Center Ordinance
Lower Saucon Township
Northampton County

Dear Mr. Finnegan,

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). Discussion on agenda items largely happens during the Committee meeting. Meeting participation details are below:

LVPC Comprehensive Planning Committee Meeting:	**LVPC Full Commission Meeting:**
February 24, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	February 26, 2026, at 7:00 PM (Virtual) https://lvpc.org/lvpc-meetings

The proposal amends the Lower Saucon Township Zoning Ordinance by adding Data Centers as a conditional use within the Light Manufacturing (LM) District.

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, 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:

- **Conditional Use:** Permitting data centers 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).

- **Emergency Planning:** The provision requiring an Emergency Response Plan aligns with *FutureLV* by enhancing planning and emergency response capabilities (of Policy 5.1). The LVPC encourages continued coordination between the applicant, Township and local emergency service providers to ensure adequate site design that supports preparedness and response capabilities.

- **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 space per on-site employee 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).

- **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).

- **Sustainable Infrastructure/Building Design:** The ordinance encourages 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).

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

- **Definitions:** The LVPC suggests amending the definition of "Data Center Equipment". In the current proposed ordinance, Data Center Equipment (DCE) is defined in relation to the noise that it generates. To support clarity, this definition should focus on the function of Data Center Equipment in order to better identify what structures or machines fall into this classification (of Policy 1.4). Additionally, this definition names DCE as accessory to "Data Storage Center", which should be amended to "Data Center" both here and throughout the ordinance to ensure consistency. Section 180-128 mentions Sensitive Receptors and includes a definition, which should be located in the definitions section instead.

- **Setbacks:** The LVPC recommends that setbacks be increased to from 200 feet to 500 feet, 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).

- **Landscaping and Screening/Fencing:** To promote clarity and efficiency in the land development process (of Policy 1.4), the Township should ensure that fencing requirements are consistent, clarify the width of buffer-yards versus landscape buffers and differentiate between them concerning the permissible plant species in Section 180-128D(1) and 180-128D(2). Encouraging the use of 'native, climate-adaptive and carbon sequestering' species is a best practice (of Policy 3.4).

- **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).

- **Power Supply:** The ordinance requires that documentation be submitted of agreement with utility providers to serve potential data centers and that the necessary capacity is available, with the details of any known impacts on rates or availability for other users. In addition to these requirements, documentation of the projected annual electricity demand and supply source(s) should be provided. The Township should also 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).

    - **Back Up Power:** The ordinance should specify that any backup power equipment minimize air pollutant emissions in accordance with EPA Tier 4 emissions standards and require 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.

    - **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).

- **Cooling:** As part of the conditional use approvals process, the applicant should specify the type of cooling method proposed, whether predominantly water-cooled or air-cooled, to 'encourage an efficient development process' (of Policy 1.4). Changes to the proposed cooling method after approval is granted will alter the required water/sewer and power requirements and change the required utility infrastructure to support it.

- **Water Supply:** The ordinance requires a Water Resources Impact Report be submitted that identifies the source of water to be used and whether an adequate supply is available or, a user agreement from a public water source and a demonstration of adequate means of wastewater disposal that includes all necessary approvals. The LVPC recommends that this report also include modeling of water use at peak-stress conditions to ensure year-round feasibility as well as proof of review and approval from the Delaware River Basin Commission (DRBC) where applicable. The additional oversight of a Water Resources Impact Report supports the 'protection of the quality and quantity of surface water and groundwater' (of Policy 3.2).

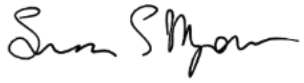
- **Environmental Impact Study:** The Environmental Impact Study requires demonstration of impact to other nearby projects and proposals, and probable future impacts of the proposal, focused on the 'elements of the environment most likely to be affected as well as potential regional effects and ecological interrelationships', and a 'detailed examination of public resources most likely impacted by the development'. This report shall also 'identify mitigation measures which may be undertaken to offset any degradation, diminution, or depletion of public natural resources'. The LVPC recommends including carbonate geology as one of the critical impact areas to be identified in the Environmental Impact Study to attempt to 'discourage development in hazard-prone areas' (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)].

Sincerely,



Mary Grace Collins
Community and Regional Planner



Susan Myerov
Director of Environmental Planning