Lehigh Valley Planning Commission

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April 14, 2026

Stephen Nowroski, Manager
Moore Township
2491 Community Drive
Bath, PA 18014

Re: Data Center Zoning Ordinance Amendment
Moore Township
Northampton County

Dear Mr. Nowroski,

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

The application proposes to amend the Moore Township zoning ordinance to define and regulate data centers as a conditional use in the Industrial (I) Zoning District.

LVPC supports Moore Township'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).

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:*

- **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).

- **Water and Sewer Impacts:** The proposed ordinance includes substantive utility and infrastructure review. Requiring evidence of water and sewage service, a water feasibility study, DRBC 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).

- **Buffering and Aesthetics:** The amendment includes meaningful impact-mitigation tools, including a 100-foot buffer yard, vegetated screening, limitations on exterior colors, requirements for emergency access, a fire protection plan, and a multi-phase acoustical study. 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).

- **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).

- **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.

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

- **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).

- **Power Supply:** The LVPC recommends that the Township 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). 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.

- **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).

- **Noise:** 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 or other non-industrial uses (of Policy 3.2).

- **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).

- **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).

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