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September 17, 2026

Cathy Fletcher, Director of Planning and Zoning
City of Bethlehem
10 E Church St
Bethlehem, PA 18018

**Re: Zoning Ordinance Amendment – Data Centers
City of Bethlehem
Lehigh and Northampton Counties**

Dear Director Fletcher,

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. Meeting details are below, and we encourage any and all participation:

LVPC Comprehensive Planning Committee Meeting:	LVPC Full Commission Meeting:
September 22, 2026, at 12:00 PM (Virtual) https://lvpc.org/lvpc-meetings	September 24, 2026, at 7:00 PM (In-Person) https://lvpc.org/lvpc-meetings

The amendment establishes a definition for Data Center, permits the use by special exception in the Industrial (IN) Zoning District, and creates a comprehensive set of related requirements that address environmental conditions, water use, wastewater disposal, electric demand, energy efficiency, electronic waste and decommissioning, emergency response, waste heat, noise, vibration, lighting, parking, dimensional standards, buffers and screening. The proposed requirements also include substantial setback requirements that would distance any proposals from existing sensitive receptors such as houses, schools, child and adult day cares, parks, hospitals and community recreation centers.

The City has undertaken a deliberate process to develop the proposed ordinance that involved consulting regional guidance, sharing best practices with other communities, and translating that information into clear local standards. The proposed ordinance is comprehensive, legally defensible, and supports *FutureLV: The Regional Plan* by 'encouraging an efficient development process responsive to regional needs' (of Policy 1.4).

Land Use and Review Process

Permitting Data Centers by special exception in the Industrial Zoning District 'matches development intensity with sustainable infrastructure capacity' (of Policy 1.1) and provides a structured process for proposals on a case-by-case basis. The proposed regulations require all applicable plans, studies, assessments and mitigation strategies with the zoning permit or land

development application, whichever is submitted first, which is a strong administrative practice because it brings the information needed to evaluate impacts into the review process at the earliest applicable stage, supporting an efficient, predictable development process (of Policy 1.4).

Utilities and Infrastructure

The ordinance appropriately requires applicants to document anticipated water use, wastewater generation and electric demand so that infrastructure needs can be understood as part of the land use review. These requirements provide a basis for transparent and consistent review and directly support efforts to ‘improve the utility infrastructure of the region’ (of Policy 1.1).

Environmental Impacts and Sustainability

The ordinance requires an Environmental Impact Assessment, Water Utilization Report, wastewater documentation and electronic waste provisions. Together, these provisions support protecting the quality and quantity of surface water and groundwater, environmentally responsible disposal and recycling, improved air quality and minimizing impacts associated with utility expansion and technological advancement (of Policy 3.2).

The ordinance also directly addresses waste heat and energy efficiency. Requiring thermal mitigation information recognizes that heat-rejection systems can create localized environmental effects, while the Power Usage Effectiveness provisions establish a measurable basis for understanding facility energy efficiency. These standards strongly support sustainable building and site-design practices, energy conservation and efficiency and business practices that mitigate climate impacts (of Policy 3.4).

Setbacks, Buffers and Screening

The proposed ordinance requires 1,000-foot setbacks from residentially zoned properties and sensitive receptors such as dwellings, institutional uses with residential components, schools, child and adult day cares, parks, hospitals and community recreation centers. The requirements for fencing, evergreen screening and equipment screening provide strong protection against potential visual, noise and operational conflicts. These provisions support context-specific design solutions responsive to Bethlehem’s established neighborhoods, institutions, parks and historic urban character (of Policy 5.4). The LVPC notes that the City’s proposed Data Center definition identifies that a Data Center facility “may also include air handlers, backup power generators, water cooling and storage facilities, utility substations,” etc., and that based on this definition, these accessory components should also comply with setback requirements.

Noise and Operational Impacts

The proposed noise standards represent a particularly well-developed response to the continuous and low-frequency sound characteristics that can distinguish Data Centers from other industrial uses. Rather than relying on a single uniform sound threshold, the City establishes direct daytime and nighttime dBA and dBC limits, a pure-tone adjustment and extensive pre- and post-construction testing requirements. This provides objective, measurable standards for evaluating both modeled and actual operating conditions and directly supports minimizing environmental and quality of life impacts of development (of Policy 3.2).

Emergency Preparedness

The emergency response plan, hazardous material disclosures, site access requirements and first responder training provisions strongly advance safe and secure community design. These materials when submitted should be provided to the City’s fire department and emergency management personnel through the existing interdepartmental review process outlined in the

City's Subdivision and Land Development Ordinance (SALDO) to 'enhance planning and emergency response efforts among emergency-management personnel' (of Policy 5.1).

Construction and Parking

The proposed ordinance requires 1.2 vehicle parking spaces per employee or five parking spaces if the number of employees is unknown, which supports right-sizing parking requirements helps avoid unnecessary impervious coverage (of Policy 2.2). The LVPC supports the City in retaining administrative flexibility where documented operating conditions may demonstrate materially different parking needs.

Decommissioning and Electronic Waste

The required electronic waste and decommissioning plan provides a mechanism for addressing equipment replacement and the eventual cessation of operations, advancing environmentally responsible electronic and hazardous waste disposal and recycling (of Policy 3.2). The City's approach appropriately establishes expectations for long-term site management planning.

Overall, the proposed amendment represents a thoughtful and intentional response to a complex land use. The City's work exemplifies the broader intent of *FutureLV* to prepare local regulations for essential digital infrastructure while protecting public health, environmental resources, infrastructure capacity and community context, and the LVPC commends the City for its commitment to evidence-based planning and sound land use administration.

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)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Sincerely,



Jill Seitz
Chief Community and Regional Planner

cc: Tad Miller, City Clerk