



Allentown Environmental Advisory Council

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Jennifer Gomez, AICP
Director of Planning and Zoning
City of Allentown
435 Hamilton Street
Allentown, PA 18101

Re: Zoning Ordinance Amendment - Data Centers

Dear Ms. Gomez:

The Allentown Environmental Advisory Council (AEAC) has reviewed the proposed draft zoning ordinance amendment regarding data centers. We appreciate the opportunity to provide our comments and support the City's sustainability and environmental goals.

We applaud the City for proactively looking to address the growing threats posed by the emergence of data centers within the Lehigh Valley and to permit them only through a special exception process through the Zoning Hearing Board (ZHB) rather than allowed as of right. By allowing approval through the ZHB, reasonable conditions can be attached to approval for mitigation which may not be allowed through administrative "By Right" approval. We also applaud the specific inclusion for advisory review by the Allentown City Planning Commission and AEAC as a requirement for an application for approval, allowing for critical review of projects for potential items for mitigation

Below are our more detailed comments on the proposed ordinance.

Use and Location

The ordinance would amend Chapter 660 by permitting Data Center Uses by Special Exception within the IG Industrial General and IM Industrial Manufacturing zoning districts. Additionally, any Data Center Use over 50,000 square foot of interior gross floor area are subject to additional lot size requirements. This allows for accessory and small-scale Data Center Uses that would have minimal impact to the City to have acceptable operations, while requiring more stringent regulations on medium, large, and hyperscale Data Center Uses.

Based on requirements for 5 acre lots within the IG zone and 8 acre lots within the IM zone, there are only 36 parcels within the City that would allow for large-scale data centers, with many

of these sites already being actively used (such as the Queen City Airport or Allentown Metal Works). While we understand that the City is required to provide for all uses, we note that locating a data center on some of those parcels may still result in potential conflicts in or near residential neighborhoods, such as locations in Jordan Heights and the 6th Ward. We are particularly concerned that some of those neighborhoods are environmental justice neighborhoods that already suffer from greater environmental exposures. While provisions under 660-38.H(2)(1) may likely limit the potential of Data Center Uses being placed in neighborhoods, we recommend continual monitoring of currently eligible parcels for hyperscale uses to ensure continued compatibility with adjacent neighborhoods.



Figure 1. Locations of IG and IM zones.

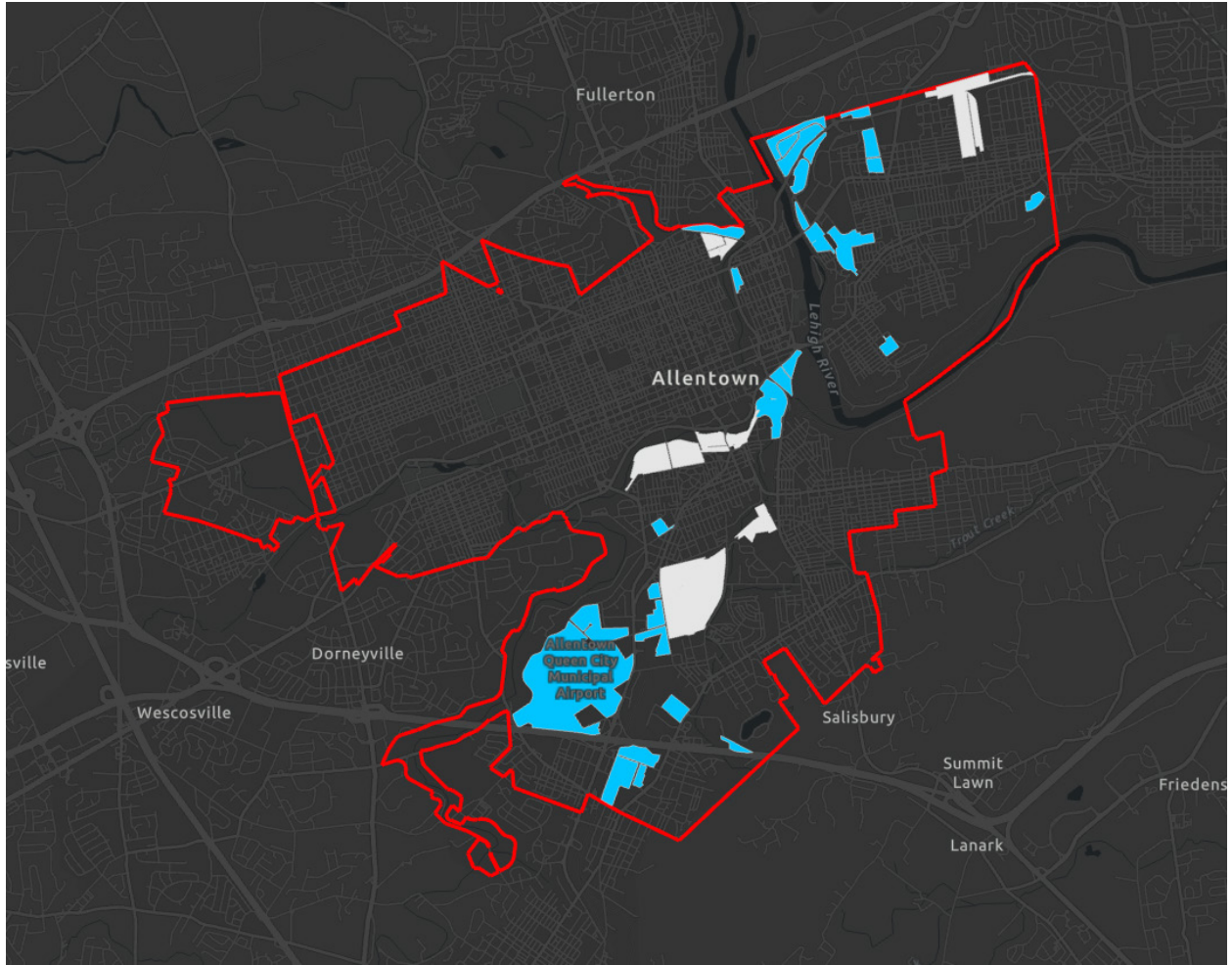


Figure 2. Locations of IG and IM zones and acreage requirements for over 50,000 sf of gross floor area.



Figure 3. Example of potential neighborhood conflicts.

Landscaping

We commend the inclusion of requirements for a landscaped buffer of at least 25 feet around the perimeter of Data Center Uses. We recommend that the requirements expressly state that native plants are encouraged to the maximum extent possible. The Allentown Shade Tree Commission may wish to comment on specific plantings, if possible.

Environmental Impact

We commend the inclusion of requirements for Environmental Impact Studies and mitigation strategies. These studies should also require the review and approval of the City Engineer, Third-Party Consultant, or other relevant agencies for concurrence with the figures and findings within the studies. We recommend expressly requiring that the environmental impact studies should assume worst case scenarios (for example impact of water consumption during drought; impact on air quality from on-site generation during extended power outage, etc). In addition, evaluation of impacts to wildlife should be broader than just habitat. For example, the types of windows and lighting can significantly affect bird strikes without affecting habitat.

Noise and Vibration

We commend the inclusion of requirements for a sound study, as well as an “as-built” sound study for post-development of a Data Center Use. We do note, however, that the current Noise provisions under the Zoning Ordinance may not account for constant low decibel noises such as “hums” that would otherwise be permitted. Additional review for appropriate provisions to adequately mitigate against “hums” or consistent ambient noises from Data Center Uses is recommended.

Water and Sewer

We commend the inclusion of requirements for a Water Utilization Report. We would also recommend requiring provisions for “concurrency” where applicable, requiring an applicant to construct any necessary infrastructure upgrades as determined by the City or LCA to supply the facility. For any nonpublic water source, we recommend requiring review and approval from the Delaware River Basin Commission and if applicable, LCA and the PA DEP for water withdrawals from groundwater or streams.

Power Supply

We commend the inclusion of requirements for an Energy Management Plan, as well as the recommendation for renewable and/or clean energy for the project. We recommend, if not elsewhere within City ordinances, adding additional regulations if an applicant uses on-site energy generation, especially if using gas or chemical powered-operations. These types of on-site energy generation may result in additional impacts to air quality and other environmental concerns.

Heat Mitigation

We commend the inclusion of requirements for heat mitigation, including vegetative or green roofs to offset urban heat island effects. This section should also include requirements to plant shade trees and to use lighter colored material for exterior walls. We recommend, if not elsewhere within City ordinances, adding requirements for the types of plants permitted for green roofs.

Height

We note that many Data Center Uses typically utilize heights between 70 and 120 feet. While we do not object to a height limitation of 50 feet, this may cause additional burdens for City staff for variance requests.

Thank you for your consideration.

Sincerely,

The Allentown Environmental Advisory Council