



THE COUNTY OF CHESTER



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September 23, 2025

Robert A. Zienkowski, Township Manager
East Vincent Township
262 Ridge Road
Spring City, PA 19475

Re: Zoning Ordinance Amendment - Data Center and Energy Technology Campus Use by Special Exception
East Vincent Township - ZA-09-25-18648

Dear Mr. Zienkowski:

The Chester County Planning Commission has reviewed the proposed East Vincent Township Zoning Ordinance amendment as submitted pursuant to the provisions of the Pennsylvania Municipalities Planning Code, Section 609(e). The referral for review was received by this office on September 12, 2025. We offer the following comments to assist in your review of the proposed Zoning Ordinance amendment.

DESCRIPTION:

1. East Vincent Township proposes the following amendments to its Zoning Ordinance:
 - A. Allow a Data Center and Energy Technology Campus (DCET) use by special exception in the IMU – Industrial Mixed Use District;
 - B. Adopt definitions for: data center, data center and energy technology campus ("DCET"), data center accessory uses, data center equipment ("DCE"), sensitive receptors, and small modular reactor;
 - C. Add bulk and lot regulations for a DCET;
 - D. Add provisions for DCETs including: parking standards, buffering regulations, the preparation of a master plan, an economic impact analysis, a traffic impact analysis, a water and sewer analysis, electric use, tree and tree replacement standards, an environmental impact study, regulations regarding sound and the preparation of a sound study, regulations pertaining to generator operation, an emergency response plan, and a community benefits agreement.

COMMENTS:

2. Data Centers (DCETs) have become indispensable to meet the demands of artificial intelligence, telecommunications, and computer systems; and they are associated with matters related to high energy use, water consumption, noise, building mass, environmental protection, among other concerns. It is appropriate that East Vincent consider adopting an ordinance that can mitigate the potential adverse consequences of such factors.

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Because DCETs result in significant land use, energy and environmental concerns that extend far beyond the physical limits of a data center site we therefore suggest that the Township regulate DCETs by conditional use instead of by special exception as the Township Supervisors may be better positioned to assess such wider community impacts. The Board of Supervisors can impose reasonable conditions on proposed DCETs and "...attach such reasonable conditions and safeguards, in addition to those expressed in the ordinance, as it may deem necessary to implement the purposes of ...the zoning ordinance." (Municipalities Planning Code, Section 913.2(a)).

The provisions in the proposed amendment are appropriate, and we suggest that the Township consider some additional matters:

- A. DCETs are intensive energy users. We suggest that the Township consider how a DCET's anticipated electricity demand may affect the capacity of the grid without creating the potential for brownouts or failures.
- B. Proposed Section 27-2806 "Data Center Standards and Criteria", Section 5 requires a Master Plan. This is a useful provision, but the reference in Subsection A. to a "sketch plan" should be clarified that the sketch plan is not to be construed as a preliminary or final plan under the provisions of the Pennsylvania Municipalities Planning Code, Section 502.
- C. Some DCETs operate without any on-staff personnel and do not require any interior lighting. Security and site access concerns should be discussed with the applicant.
- D. The Township's first responders should assess how they will handle emergencies in DCETs, especially those that involve electrical equipment, water systems and hazardous materials.
- E. The Township's amendment requires proof of review and approval from the Delaware River Basin Commission for water withdrawals of 100,000 gallons per day or more than any 30-day average from any source or combination of sources within the River Basin (as well as other withdrawals). The Township should ensure that the release of water used for cooling the DCET will not adversely affect the watershed, because such water may be at a higher temperature than that of the receiving water. The applicant for a DCET should also discuss what will happen if adjacent water wells are affected by the DCET's water use.
- F. DCETs should also indicate if methods to release excess heat from cooling water may require the use of cooling towers, with their attendant visible plumes of water vapor.
- G. The economic lifecycle of a DCET should be assessed, and the disposal of e-waste should be discussed.
- H. The amendment's "Tree and Tree Replacement Standards" allow "...Up to sixty percent (60%) of existing trees (including woodlands) are permitted to be cleared if the following conditions are met...", and "... The total caliper of the cleared trees shall be replaced to the satisfaction of the Township Arborist." The Township should clarify who will be designated as the Township Arborist.
- I. Proposed Section 27-2806.12. "Sound; Sound Study; Generator Operation" should also assess the potential for vibrations that may be perceived through the ground, or which may be intermittent. The Township may need to engage a person who is trained and qualified in the use of sound-measuring equipment to establish objective measurements to determine compliance with the Ordinance.
- J. Proposed Section 27-2806.14. "Community Benefits Agreement" should be reviewed by the Township Solicitor to determine if it is consistent with the applicable provisions of the MPC.
- K. The Township should also assess the aesthetic effects of a DCET, specifically because proposed Section 27-2806.4. "Area and Bulk Regulations" permits a maximum building height of 90 feet and a gross building size of 300,000 square feet. The Township could consider requiring a view analysis of a proposed DCET from "SENSITIVE RECEPTORES" [SIC].

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RECOMMENDATION: East Vincent Township should consider the comments in this letter before acting on the proposed zoning ordinance amendment.

We request an official copy of the decision made by the East Vincent Township Supervisors, as required by Section 609(g) of the Pennsylvania Municipalities Planning Code. This will allow us to maintain a current file copy of your ordinance.

Sincerely,

A handwritten signature in black ink that reads "Wes Bruckno". The signature is written in a cursive, flowing style.

Wes Bruckno
Senior Review Planner