Lehigh Valley Planning Commission

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Planning for the Future of Lehigh and Northampton Counties at 615 Waterfront Drive, Suite 201, Allentown, PA 18102 ■ (610) 264-4544 ■ lvpc@lvpc.org ■ www.lvpc.org

June 7, 2024

Jill Garcia, Manager
Wilson Borough
2040 Hay Terrace
Easton, PA 18042

Carl Manges, Planning Administrator
City of Easton
123 South Third Street
Easton, PA 18042

Kent Baird, Planning Director
Palmer Township
3 Weller Place
Palmer, PA 18045

**RE: Easton Commerce Park – Land Use of Regional Significance**
**Wilson Borough, City of Easton and Palmer Township**
**Northampton County**

Dear Ms. Garcia, Mr. Manges and Mr. Baird:

The application is considered a Land Use of Regional Significance under *FutureLV: The Regional Plan* in the Warehouse, Logistics and Storage Facilities, Freight Facility Local Freight Generator category. 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 primarily takes place during the Committee meeting. Both meetings will be virtual and held on:

- LVPC Comprehensive Planning Committee Meeting
  - June 25, 2024, at 12:00 PM
  - https://lvpc.org/lvpc-meetings
- LVPC Full Commission Meeting
  - June 27, 2024, at 7:00 PM
  - https://lvpc.org/lvpc-meetings

The application proposes to construct a 1,006,880-square-foot warehouse at 1525 Wood Avenue (parcel numbers L9 14 4 0310, L9 14 4 0324, L9 14 4 0837, L9 23 1 0310, L9 23 1 0837, L9 22 1 0837, L9 15 1 0310, L9 6 1 0310, L9 6 1 0837, L9 6 1B 0310, L9NW3C 1 1 0837 and L9NW3D 1 2 0837). The majority of the proposed building is located in Wilson Borough with a portion extending into the City of Easton. The northwestern portion of the property is in Palmer Township, but has no proposed development. The 106.2-acre site formerly contained industrial development to the southeast where buildings have been removed, and the western and northern portions of the property are undeveloped, containing woodlands and steep slopes.

**Site Suitability**
The project is located in the Development Area of the *FutureLV: The Regional Plan* General Land Use Plan. The site formerly contained a pigment plant operation, a heavy industrial use that has been vacant and underutilized for several years. Municipal zoning designations for the site reflect the intent of the Borough, City and Township to facilitate redevelopment in this location:

| **Municipality** | **Zoning Designation** | **Is The Use Permitted?** |
|---|---|---|
| Wilson Borough | General Industrial (I-1) | Yes (G-13 Warehouse) |
| City of Easton | Adaptive Reuse (AR) | Yes (F8 Warehouse and storage) |
| Palmer Township | Light Industrial/Mixed Use (LI/MU) | Not permitted |

Warehousing is a permitted-by-right use in the zoning designations for the site within Wilson Borough and the City of Easton. Warehousing is not a permitted use in Palmer Township's jurisdiction; the Light Industrial/Mixed Use district is intended for business and commercial-oriented uses rather than industrial.

The site is served by public sewer and water utilities, and reinvestment in commercial areas promotes the fiscal health and sustainability of municipalities. Redevelopment of the site provides economic benefits to the community, including jobs accessible to residents and tax revenue for the municipalities and school districts (of Policies 4.6 and 5.4).

Redevelopment of the site has the potential to align with *FutureLV: The Regional Plan* if scaled appropriately, and by taking steps to mitigate environmental and transportation impacts. However, the size of the proposed building, at more than 1 million square feet, greatly surpasses the scale of surrounding developments. The proposal has been designed to maximize building size, disregarding site topography and existing natural resources, including steep slopes and woodlands that are critical to supporting wildlife habitats adjacent to the Bushkill Creek. Opportunities are present to reduce the building square footage or provide multiple smaller buildings, such as for commercial-flex spaces, which would also eliminate conflicts with the Palmer Township zoning designation.

Additionally, roadways in the vicinity were not built to withstand the impacts of such a high volume of tractor-trailers and are currently inadequate to accommodate the proposal. Nearby developments and existing land uses, including Hackett Park and Palmer Township residential neighborhoods to the northwest and the Simon Silk Mill mixed-use redevelopment in the City of Easton to the east, face quality of life impacts depending on how traffic is routed to and from the site.

As proposed, the development does not align with *FutureLV: The Regional Plan* because it does not 'match development intensity with sustainable transportation infrastructure capacity' (of Policy 1.1). If the project moves forward as proposed, development impacts should be mitigated to protect the public health, safety and welfare, and to ensure the lowest impact and most sustainable site design in the fiscal interests of the developer, Borough, City and Township.

**Natural Features**
The project site contains a variety of natural features, including woodlands, hydrographic features, steep slopes of 15%-25% and is identified as a Natural Heritage Inventor Supporting

Landscape according to the Pennsylvania Natural Heritage Program. The northernmost portion of the site is identified as a Local Natural Area, Binney & Smith Woods. Avoiding steep slope and woodland areas by utilizing smaller building footprints and increasing the buffer distances between development and natural resources would 'maximize preservation of woodlands, critical habitats and natural resources in the land development process' (of Policy 3.1).

**Floodplain and Tributary**

A portion of the site to the southeast is located in a floodplain area identified by the Federal Emergency Management Agency (FEMA) as 1% Annual Chance Flood Hazard. Development in the floodplain and relocation of the Bushkill Creek tributary as indicated on the plans will be subject to FEMA and Pennsylvania Department of Environmental Protection review and permit approval.

**Landscaping**

No landscaping features are depicted on any of the landscape plan sheets. These sheets only include planting lists, but no design has been provided. Providing sufficient landscaping is crucial to mitigating stormwater impacts generated by impervious surfaces, offsetting air quality impacts generated by motor vehicles especially freight vehicle idling, reducing disturbance to nearby wildlife habitats, and improving the health and wellness of employees and visitors. Appropriate landscaping should also be provided within detention basins, with paths to access them, to further improve access to green spaces (of Policies 3.1, 3.2, 3.4 and 5.3).

**Lighting**

Upward lighting should be avoided to protect disturbing wildlife and migratory patterns. The LVPC recommends ensuring that lighting fixtures are designed to minimize glare and are targeted in a manner that supports, ‘maximizing the preservation of critical habitats’ (Policy 3.1).

**Sustainable Energy**

The LVPC encourages the developer to consider opportunities for incorporating sustainable energy systems that reduce overhead operational costs and ‘minimize environmental impacts of development’ (Policy 3.1), such as geothermal energy systems, solar panels and greywater reuse for irrigation and plumbing. Incorporating sustainable practices help to ‘reduce climate change impacts’ (Policy 3.4).

The significant footprint and design of the proposed structure lends itself to more innovative approaches to minimize stormwater runoff and higher energy efficiency. Based on current plans, stormwater is to be captured in a series of large managed release concept (MRC) basins (designed to capture discharge and slowly release but prevent infiltration). As proposed, the location of the basins will require that a segment of the unnamed tributary to Bushkill Creek be relocated. We encourage the developers to evaluate utilizing green and blue roof technologies to take advantage of multiple potential environmental and building efficiency benefits. These include managing stormwater runoff volume and rate, reducing building energy costs by regulating building temperature in both summer and winter, reducing heat island effect by providing evaporative cooling, and extending service life of roofing materials.

**Traffic Impact Study Discrepancies**

The LVPC reviewed the submitted Transportation Impact Study (TIS) prepared by KCI Technologies Inc. dated December 2023. The LVPC noted substantial discrepancies between the TIS and land development plans regarding what is proposed – the submitted plan set

reflects a 1,006,880-square-foot warehouse while the TIS reflects a 221,256-square-foot high cube sort fulfillment center.

A transmittal letter dated May 1, 2024 submitted with the TIS states that the TIS will be revised and resubmitted concurrently to PennDOT and the municipalities for review. At the time of resubmission, the revised TIS should be provided to LVPC for review and comment as well. The Lehigh Valley Planning Commission as the bi-county planning organization for Lehigh and Northampton counties has responsibilities designated by the Pennsylvania Municipalities Planning Code (MPC) to provide guidance to the region on the potential impacts of proposed subdivision and land development projects. Inaccurate Transportation Impact Studies or planning process documents preclude accurate analyses and review of the proposal to determine impacts. The TIS must be updated to match the submitted plan set so that a complete and thorough review of anticipated transportation impacts on the community and region can be done with quality data and planning. Without current and correct information within land development applications, the LVPC cannot properly review the proposal from a county planning perspective.

An example of the changes in average anticipated trip generation between different land uses are calculated using the Institute of Transportation Engineers (ITE) Trip generation Manual, 11th edition are below. The LVPC used ITE Land Use Codes 155 (High Cube Fulfillment Center) and 150 (Warehousing) for a cursory analysis to illustrate the difficulties in transportation planning reviews when the transportation impact study does not match the plan set submitted. The calculations illustrate the wide ranges of transportation impacts that could be generated from changes of the building based on square footage and the characteristics of the operations of the facility:

| Land Use | Square footage | Passenger Vehicles | Commercial Trucks | Total Trips |
|---|---|---|---|---|
| Submitted TIS: High-Cube Fulfillment Center (Sort) Warehouse | 221,256 | 1,383 | 42 | 1,425 |
| Submitted Plan: High-Cube Fulfillment Center Warehouse | 1,006,880 | 6,484 | 191 | 6,293 |
| Submitted Plan: Warehouse | 1,006,880 | 1,118 | 604 | 1,726 |

Due to the discrepancies between the TIS and development plans as described above, the submitted TIS does not align with *FutureLV: The Regional Plan*.

**Essential Freight Accommodations**

The submitted plan set does not depict adequate parking for tractor-trailers. The shown parking spaces for trailers appear to be approximately 62 feet in length, however the longest legal tractor-trailers permitted on Pennsylvania roadways without a permit is 70’ with a tractor connected to the trailer. It is essential that freight-centric facilities provide truck parking on site to minimize truck parking and queueing on local streets (of Policy 2.4). Parking spaces should also be made available for tractor-trailer drivers to park overnight long-term to comply with federal laws regulating the hours of operation for commercial driver license holders (of *FutureLV* Policy 2.4).

Parking lots should be constructed with infrastructure to support electric vehicle charging on site. Electric vehicles are commonplace and most large vehicle manufacturers will eliminate

fossil fuel vehicles in the next decade or so. The air quality improvements as a result of decarbonization efforts from the private and public sectors, such as deployment of electric vehicles, are essential to improving air quality in the Lehigh Valley. Convenient charging stations may facilitate more employees who may travel long distances to utilize electric vehicles. In addition, heavy vehicles and equipment are increasingly electric and alternative fueled which further supports addition of charging infrastructure.

As part of providing freight-supportive infrastructure to minimize freight impacts on residents, it is recommended that the project incorporate snow removal equipment onsite for the removal of snow and ice from the tops of trucks and trailers as required by Pennsylvania State Law. Truck drivers are required to remove snow and ice hazards but need the appropriate equipment in which to remove the hazard in a safe and efficient manner. Snow removal equipment is becoming more commonplace at freight-centric facilities. Having this equipment helps ensure a safe transportation network free of snow and ice that may slide off the tops of trucks and trailers and cause disruptions on the roadway and to other vehicles and multimodal users (of *FutureLV* Policy 1.4).

Freight-centric facilities are reliant on tractor-trailers and commercial vehicles to operate and should play a part in accommodating the needs of the vehicles and drivers. Inclusion of a driver lounge with restrooms is strongly recommended to give drivers an area to plan their day, route themselves to their next destination and eat. A driver lounge can be an area to also communicate area transportation issues such as construction or available fuel locations and repair or maintenance services for their vehicles (of *FutureLV* Policy 2.4).

**Traffic Circulation and Emergency Access**
Proposed site access is provided by full access driveways on Wood Avenue and Hackett Avenue, both of which are state roads designated by the Pennsylvania Department of Transportation (PennDOT) as Route 2017. An internal driveway splits off from the Wood Avenue access driveway, leading to the passenger vehicle parking area on the southwestern side of the building.

The LVPC recommends ensuring that emergency services departments are involved in the site design and planning process to ensure responders are aware of site circulation to enhance response times and enable them to have the necessary equipment and training to serve a building of such large scale. Developments on steep slopes or sites with substantial grading can also be difficult to service in the event of a fire. Coordinating with emergency services departments is a best practice to 'enhance planning and emergency response efforts among emergency management personnel' (of Policies 2.2 and 5.1).

**Limited Local Infrastructure**
The road geometry where Hackett Avenue intersects Wood Avenue at a curve, forming a Y intersection, creates a difficult intersection for traffic to navigate, and potential traffic conflicts will be exacerbated by a significant increase in vehicles once the development opens. The LVPC encourages the applicant to work with PennDOT in developing roadway solutions that improve the flow of traffic, such as including a roundabout, to optimize roadway capacity and efficient movement of people and goods (of Policies 2.1 and 2.2).

*Google Maps Aerial Imagery*

Hackett Avenue along the frontage of the property has a bridge that was constructed in 1912 and is identified as “fair” condition by PennDOT Bridge Key 28730. This bridge will be significantly impacted by the proposed development, creating a situation that is unsustainable. It is of note that the bridge also has a significant elevation change. An immediate plan to replace this bridge is critical for the operation of the industrial site and to keep the transportation network in a state of good repair (of Policies 2.2 and 4.6).

It is recommended that the developer coordinate with the Borough, City, Township and PennDOT to create a truck route from the proposed development to Route 22. Drivers should be provided with a clear direction of travel that can accommodate their commercial vehicles to mitigate impacts to the surrounding community. Assessing and planning for impacts to Route 22 and identifying truck routes from the project to destinations in all directions are an essential part of proper transportation planning. The existing geometry and design of Route 22 interchange at Wood Avenue is a concern. It should be verified that tractor-trailers of up to 70 feet in length can safely and efficiently navigate the interchange without impacting existing traffic conditions. It is also recommended that freight impacts to the 25th Street intersection at Route 22 west of the project be studied to confirm the long-term sustainability of the project and the impacts to all three municipalities.

It is paramount that truck routing is specifically provided in the westbound direction on Hackett Avenue to prevent freight impacts to Hackett Park and the residential neighborhoods in Palmer Township to the northwest. If truck drivers need to travel to the north, GPS routing may utilize Tatamy Road to access Route 33. The LVPC recommends the proposed access drive on Hackett Avenue be restricted to left turn only for tractor-trailers to eliminate the possibility that trucks will be routed through local neighborhoods to minimize freight impacts (of Policy 2.4).

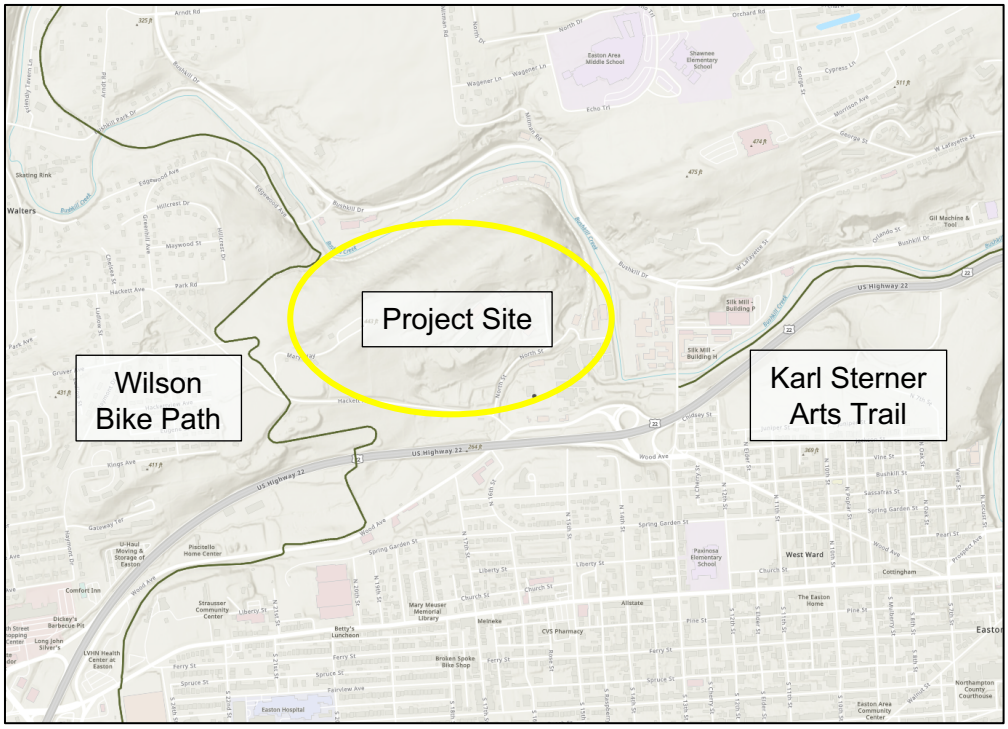
Similarly, truck routing to the east along Wood Avenue to North 13th Street should be eliminated to prevent freight impacts to the Simon Silk Mill mixed-use development in the City of Easton. Thoughtful anticipation of freight movements during the planning process with a comprehensive truck routing plan is paramount to identifying infrastructure needs and preventing adverse impacts to the surrounding communities.

**Multimodal Transportation**

Ensuring the workforce is able to use a variety of transportation modes to access the site is imperative to the long-term success and marketability of the proposal. The LVPC commends the

proposed walking trail along the eastern and northern perimeter of the site, which provides a connection to the Karl Sterner Arts Trail in the City of Easton. However, no connections are proposed between the proposed trail and proposed building. The LVPC recommends evaluating opportunities to connect the proposed trail to the building to ensure employees are able to utilize the trail for commuting.

Additionally, the LVPC strongly recommends facilitating connections to the Wilson Bike Path, an existing Regional Trail with connections north to Tatamy Borough and beyond and west to the City of Bethlehem and beyond. Providing connections to the Wilson Bike Path would close a gap in the trail network (of Policy 2.1).




Access to the Wilson Bike Path can be facilitated by constructing sidewalks along the Wood Avenue and Hackett Avenue property frontage. Sidewalks should also be constructed along both access driveways connecting to the proposed building. This infrastructure is critical to the health and wellbeing of employees and visitors to the warehouse who may wish to utilize sidewalks instead of walking or rolling in the roadway intended for motorized vehicles (of Policy 5.1).

*A "Pedestrian Crossing" sign is currently located near the intersection of Wood Street and Hackett Avenue, indicating an existing demand for pedestrian infrastructure in the area.*

Bicycle racks should be located at convenient locations near employee entrances to accommodate bicycle commuters as a low-cost low-impact form of transportation (of *FutureLV* Policy 5.2).

**Lehigh and Northampton Transportation Authority (LANTA)**

The Lehigh and Northampton Transportation Authority (LANTA) does not provide transit service in the project vicinity. The closest nearby transit service is located at the intersection of Northampton Street and 13th Street, approximately .40 miles south of the existing parking lot and start of the Karl Stirner Arts Trail, which is directly east of the project site. LANTA is aware of the proposed plans to extend the Karl Stirner Arts Trail across 13th Street to follow the Bushkill Creek, which runs along the perimeter of the project site's complex.

The proposed plan does not include pedestrian connections and internal site circulation within the project site to connect pedestrians to the main entrances of the proposed 1 million square foot facility. While fixed route transit service directly to the project site is infeasible, LANTA sees great potential for this proposed project to connect to transit service on 13th Street if the plan includes pedestrian accessible connections from the proposed Karl Stirner Arts Trail extension to the main entrances of the proposed facility through a comprehensive pedestrian network within the project site. Given the proposed use of the project, LANTA anticipates ridership demand on 13th Street, however the pedestrian connectivity to the project site is necessary to consider proposed transit service on 13th Street in the future.

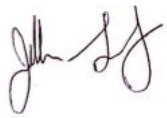
For follow up, please contact LANTA Planner/Land Use Specialist Molly Wood at mwood@lantabus-pa.gov.

**Stormwater Review**
The project site is located within the Bushkill Creek watershed. This watershed has a fully implemented Act 167 Stormwater Management Ordinance. Comments related to our review of the project's stormwater management plan are included as attachment 1.

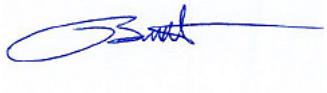
Municipalities, when considering subdivision/land developments, should reasonably attempt to be consistent with *FutureLV: The Regional Plan*, as required by the Pennsylvania Municipalities Planning Code (MPC) [Article 1§105, Article III§303, §304 & §306(a), Article VI§603(j)]. The LVPC review does not include an in-depth examination of plans relative to subdivision design standards or ordinance requirements since these items are covered in the municipal review.

Representatives of adjacent municipalities have been copied on this letter to 'coordinate land use decisions across municipal boundaries' (of Policy 1.4). Please feel free to reach out with any questions.

Sincerely,



Jill Seitz
Chief Community and Regional Planner



Brian Hite
Transportation Planner

Susan Myerov
Director of Environmental Planning

cc: Easton Wood Ave PropCo, LLC, Applicant; Bogia Engineering, Project Engineer; Abruzzi Trust, Nevada Dynasty Trust, Record Property Owner; Monica Wall, Borough Engineer; Steven DeSalva, City Engineer; Justin Coyle, Township Engineer; Tina Smith, Northampton County Director of Community and Economic Development; Molly Wood, LANTA Planner/Land Use Specialist; Dion Campbell, Northampton County Conservation District Director

ATTACHMENT 1

Act 167 Drainage Plan Review

June 7, 2024

Re: Easton Commerce Park
Plans Dated April 1, 2024
Wilson Borough, Palmer Township and City of Easton
Northampton County

The proposed storm drainage concept presented in the plans dated April 1, 2024 and storm drainage calculations dated February 2024 has been reviewed for consistency with the *Bushkill Creek Watershed Act 167 Storm Water Management Ordinance*, May 1992. A checklist of the Act 167 review items is attached for your information. As indicated on the checklist, each item of the Drainage Plan has been reviewed for consistency with the Act 167 Ordinance. A brief narrative of the review findings is as follows:

The proposed development is located within drainage districts 129 and 130 of the Bushkill Creek Watershed as delineated in the Act 167 Plan. As such, the runoff control criterion for the site is Provisional No Detention for the 2-, 10-, 25-, and 100- year return period storms. Based on review of the plans and calculations, the following deficiencies are noted. A separate map showing the pre- and post- development drainage boundaries and times of concentration should be provided. The boundaries are too difficult to see on the existing condition and grading plans and could not be verified. Areas draining to on-site closed depressions need to be evaluated for runoff impact in the pre-development condition. A portion of drainage area 1 will flow across a neighboring property before reaching the Bushkill Creek. This area should be delineated and pre- and post- development flows should be provided to demonstrate that there will not be an increase in peak runoff. The outfall pipes from basins A and B are creating concentrated discharge points. Conveyance should be provided downstream to basin C. There appears to be disturbed areas that are outside of the defined drainage areas. This may be clarified once revised drainage area maps are provided. The plans should clearly show how runoff from drainage areas 2, 5, 6, and 7 reaches the creek or tributary. There are wooded areas shown on the plans that do not appear in the calculations. The pre-development calculations use a runoff curve number of 36 for open space for A soils that should be 39. It appears that drainage areas EXT B and EXT C were included in the tributary areas to the respective basins. These areas do not flow to the basins and should be included in the bypass areas. The post- development inflow to basin C does not include the 0.91 acres of open space and should be revised. The routing for each basin should start with the basin full to the elevation of the first orifice. The spillway capacity calculation should be revised to show capacity to pass the 100-year inflow to the basins. Freeboard calculations from the maximum pool elevation to the invert of the spillway have not been provided. The basin C storm sewer calculations show zero flow and should be checked and revised. Calculations for the sizing of the channel for the realigned stream should be provided along with a drainage easement as required by the ordinance. Therefore, the

Drainage Plan has been found to be inconsistent with the Act 167 requirements.

Note that only those details of the Drainage Plan included on the checklist have been covered by this review. Therefore, notable portions of the Drainage Plan not reviewed include any aspect of the post-construction storm water management plan concerning water quality, the details and design of any proposed water quality BMPs, the Erosion and Sedimentation Control Plan and the details of the runoff collection system (piping). These items are reviewed by the municipal engineer and/or others, as applicable.

Once the outlined issues have been addressed, the revised plans and calculations will need to be resubmitted to our office. Please call with any questions regarding these comments.

Sincerely yours,

Geoffrey A. Reese, PE
Master Planner and Engineer

Denjam Khadka
Senior Civil/Environmental Engineer

Attachment

# LVPC ACT 167 REVIEW CHECKLIST

Development Name: Easton Commerce Park
Municipality: Wilson Borough, Palmer Township and City of Easton
Date: June 6, 2024

Watershed: Bushkill Creek
Reviewers: Denjam Khadka & Geoffrey A. Reese, PE
Checked by:

| Ordinance Reference | Item | Consistency w/Ordinance Yes | No | N/A | Comment |
|---|---|---|---|---|---|
| 301.A-G. | General storm water management requirements | | X | | See Attachment 1 for details. |
| H. | Consideration of volume controls | X | | | |
| 303.A. | Design consistency with applicable provisions from 302.A. and B | | X | | See Attachment 1 for details. |
| B. | Mapping of Storm Water Management District Boundaries | | X | | See Attachment 1 for details. |
| C. | Downstream capacity analysis | | | X | |
| D. | Multiple discharge points within a single subarea | | | X | |
| E,F. | Multiple discharge points within multiple subareas | | X | | See Attachment 1 for details. |
| G. | Documentation of “no harm” downstream | | | X | |
| H. | Regional or subregional detention analysis | | | X | |
| I. | Capacity improvements analysis | | | X | |
| 304.A. | Computation method (rational or soil-cover-complex) | X | | | Soil-cover-complex method used. |
| B. | Verification of detention design by routing | | X | | See Attachment 1 for details. |
| | Check rational method detention volume vs. TR55 | | | X | |
| C. | Minimum detention pond freeboard specifications | | X | | See Attachment 1 for details. |
| D. | Soil-cover-complex method design rainfall | X | | | |
| E. | Rainfall intensities for rational method | | | X | |
| F. | Curve Numbers for soil-cover-complex method | | X | | See Attachment 1 for details. |
| G. | Runoff coefficients for the rational method | | | X | |
| H. | Manning equation to calculate watercourse capacity | X | | | |
| 403. | Drainage Plan Contents | | X | | See Attachment 1 for details. |

302.A,B. Applicable Storm Water Management Provisions

| | | | | |
|---|---|---|---|---|
| Subarea(s) | 129,130 | | | |
| Criteria | PND | | | |

Criteria Key: RR = release rate; PND = provisional no detention