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August 19, 2024

MICHAEL J. MEGINNISS, ESQUIRE

680 Middletown Blvd.

Langhorne, PA 19047

**RE: Decision of Falls Township Zoning Hearing Board
Application of NP Falls Township Industrial LLC**

Dear Mr. Meginniss:

At its regular meeting of August 13, 2024, the Falls Township Zoning Hearing Board voted to grant the application of NP Falls Township Industrial LLC for a variance from Section 209-43.F of the Falls Township Zoning Ordinance to not allow the noise and decibel level restrictions to apply to the following properties: Tax Map Parcel # 13- 051-001, #13-051-001-034, and #13-051-001-022. This approval pertains to the location as depicted on the plans and in accordance with the testimony presented to the Zoning Hearing Board.

Upon receipt of this decision, please contact Falls Township to obtain any and all required permits and any additional approvals prior to beginning work.

Very truly yours,

/s/ Keith J. Bidlingmaier

KEITH J. BIDLINGMAIER, ESQUIRE

KJB:ah

cc: Michael P. Clarke, Esquire, Township Solicitor (mclarke@rudolphclarke.com)

Matthew Takita, Township Manager (m.takita@fallstwp.com)



February 18, 2025

Mr. Matthew Takita, AIA, MCP, Township Manager
Falls Township Municipal Building
188 Lincoln Highway, Suite 100
Fairless Hills, PA 19030

**RE: Preliminary and Final Land Development Application
Northpoint Area 3 Development
Sorrells Boulevard
TMP #13-051-001
Zoned: MPM (Materials Processing & Manufacturing)
Township of Falls, Bucks County, Pennsylvania
JEA Project# LD25-01**

Dear Mr. Takita:

As requested, we have reviewed the above referenced 129 sheet Preliminary-Final plan series prepared for North Point Development of Cincinnati, OH dated January 17, 2025 prepared by Gilmore & Associates of New Britain, PA. The following comments are offered for your consideration:

APPLICATION DOCUMENTS SUBMITTED

As requested by the Township, we have completed our review for the following information:

- Preliminary/Final Overall Site Plans (Sheets 1-129) dated January 17, 2025
- Subdivision and Land Development Waiver Request letter dated January 17, 2025
- Erosion and Sedimentation Control Report dated January 17, 2025
- Post Construction Stormwater Management Report dated January 17, 2025
- Drainage Area Map (Sheets 1-9) dated January 17, 2025

ZONING ORDINANCE

Section

Description

209-30 (D) *Area and yard requirements. See Table 5.*

Comment: The Zoning Table shown on Sheet 2 (Record Plan) must be revised to include the proposed area and yard dimensions.

209-42 (E) *Access. Access points from any one nonresidential lot, crossing the street line, shall be limited to a maximum of two along the frontage of any single street. The center lines of any separate access points shall be spaced at least 65 feet apart, and such access points shall handle no more than four lanes of traffic. Continuous open driveways in excess of 30 feet at the street line shall be prohibited, except that for nonresidential uses, this dimension shall be measured at the straight portion of the driveway prior to the radii rather than the street line. However, this dimension shall not be measured at a point more than 55 feet from the street line.*

<u>Section</u>	<u>Description</u>
209-42 (E) (Cont'd)	<i>Curbing shall be depressed at the driveway connected with the street at the access point.</i>

Comment: The plans indicated the Applicant requires a variance from this section of the ordinance to permit a driveway width of 35 feet at a setback of 55 feet from the street line.

209-42 (H) (22) (b) (1)	<i>Number of personnel: 1.25 spaces for each employee on the major shift, two spaces for each managerial personnel and one additional parking space for each business-related vehicle located on the premises.</i>
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Comment: The parking calculations should include the required 805 parking spaces and the ADA spaces should be in addition to the required number of parking spaces.

209-43	<i>An application for a permit shall provide documentation that the intended use will comply with the performance standards enumerated in Section 209-43.</i>
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Comment: The Applicant must provide documentation indicating that the project will comply with the standards enumerated in this section of the ordinance.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE

<u>Section</u>	<u>Description</u>
191-29 (E)	<i>Subdivisions and land developments shall be properly designed in order to prevent the necessity for excessive cut or fill.</i>

Comment: Cut/fill calculations must be submitted for review.

191-29 (H)	<i>"The Falls Township Design Details and Practices contain structural details along with the specific structural design standards required for subdivision and land developments". The following details must be submitted for review:</i>
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Comment:

- Details pertaining to the proposed relocation of the aerial Utility Transmission Lines along the realigned South Port Road and a structural analysis of proposed utility tower structures must be submitted.

<u>Section</u>	<u>Description</u>
191-30 (A)	<i>The arrangement, character, extent, grade and location of streets shall conform to the Falls Township Street Plan and shall be considered in their relation to existing and planned streets, to topographical conditions, to public convenience and safety and in their appropriate relation to the proposed uses of the land to be served by such streets.</i> Comment: The design of multiple vertical curves in succession should be avoided in accordance with <i>PennDOT Design Manual Publication 13M revised April 2021</i>. We defer to the Township Traffic Engineer for review and comments of the proposed vertical alignment of South Port Road.
191-30 (I) (4)	<i>Industrial: a development consisting of 50,000 square feet or more of gross leasable floor space.</i> Comment: The Applicant has submitted a traffic impact study by McMahon Engineering dated April 2021 and included previously the site buildout of roughly 11,500,000 square feet of warehouse space. It was recommended that improvements of multiple intersections both on-site and off-site be incorporated for the proposed development. As stated within the report, certain improvements are to be made when 6,000,000 square feet of warehouse space has been constructed. We defer to the Township Traffic Engineer to assess the potential need for an updated TIS due to the new user and the appropriate timing for construction off-site improvements.
191-31 (A)	<i>Streets shall be constructed in accordance with the following requirements:</i> Comment: The Applicant is requesting a waiver from this section of the ordinance requiring thirty-six-foot (36') cartway widths to permit thirty-two-foot (32') cartway widths. Vehicle turning diagrams must be submitted for review.
191-52	<i>Measures used to control erosion and reduce sedimentation shall, at a minimum, meet the standards and specifications of the Bucks County Conservation District and the Pennsylvania Department of Environmental Protection. The Township Engineer shall ensure compliance with the appropriate specifications.</i> Comment: The Applicant is in the process of obtaining amended NPDES approval through Pennsylvania Department of Environmental Protection.
191-52.1 (B)(3)(b)[1]	<i>Fifteen-to-twenty-five-percent slope: 70% shall remain as resource-protected land. No more than 30% of the total of all such areas shall be developed and/or regraded or stripped of vegetation.</i> Comment: The Applicant is requesting a waiver from this section of the ordinance to allow 100% disturbance of the 15-25% steep slopes within the site.

<u>Section</u>	<u>Description</u>
191-52.1 (B)(3)(b)[2]	<i>Twenty-five percent or more slope: 85% shall remain as resource-protected land. No more than 15% of the total of all such areas shall be developed and/or regraded or stripped of vegetation.</i> Comment: The Applicant is requesting a waiver from this section of the ordinance to allow 100% disturbance of the greater than 25% steep slopes within the site.
191-52.1 (B)(4)(b)[2]	<i>Other wooded areas. No more than 50% of woodlands which are not located in environmentally sensitive areas (as defined above) shall be altered, regraded, cleared or built upon.</i> Comment: The Applicant is requesting a waiver from this section of the ordinance to allow a 100% disturbance of the existing woodlands on site.
191-69 (A)	<i>The developer shall cause utility facilities to be installed in such a manner as to make adequate service available to each lot or dwelling unit in the subdivision or land development.</i> Comment: The Applicant must provide service letters from the authorities having jurisdiction within the development.
191-78 (C)(1)	<i>In accordance with §191-78 (C)(1), "...a complete outline survey, based on field measurements, of the property to be subdivided or developed, showing all courses, distances, areas, and tie-ins to all adjacent street intersections. Horizontal references shall be in accordance with the Pennsylvania State Plane Coordinate System (NAD83).</i> Comment: • Provide two points along each lot boundary referenced to state plane coordinates. • Note the horizontal and vertical datums utilized for the design on Record Plan.
191-78 (C)(2)	<i>The location, names, and widths of streets; the location and names of railroads; the location of property lines, the names of adjacent property owners and the Bucks County Tax Parcel Number of each property; and the location of watercourses, sanitary sewers, storm drains and similar features within 200 feet of any part of the land to be subdivided or developed.</i> Comment: The Applicant is requesting a partial waiver from this section of the ordinance, as long as the plans provide sufficient topography.

<u>Section</u>	<u>Description</u>
191-78 (D)(12)	<i>A table showing existing and proposed impervious surface quantities, by category.</i> Comment: The existing and proposed impervious surface coverages must be provided for both this individual phase as well as the entire site (i.e. cumulative calculations). This will help to ensure that the impervious surface and building coverages on the overall site comply with district requirements.

STORMWATER MANAGEMENT ORDINANCE

<u>Section</u>	<u>Description</u>
187-11 (B)(10)	<i>The applicant shall demonstrate that they designed the regulated activities in the following sequence to minimize the increases in stormwater runoff and impacts to water quality: Conduct a proposed conditions runoff analysis based on the final design and to meet the release rate and, in turn, the overbank flow and extreme event requirements.</i> Comment: The emergency spillways for each surface basin must be shown on the Plan and constructible details provided.
187-12 (J)	<i>Energy-dissipating devices (riprap, etc.) shall be placed at all basin and pipe outlets. Sizing of riprap shall be based on the one-hundred-year flow rate and the design methods described in the Pennsylvania Department of Environmental Protection Erosion and Sediment Pollution Control Manual.</i> Comment: The sizing of the energy dissipators/riprap aprons at the outlets of each endwall shown on Page 102 of the ES Report must be included on the Plan.
187-12 (L)	<i>Any stormwater management facility (i.e., detention basin) designed to store runoff and requiring the use of a berm or earthen embankment shall be designed such that the minimum height of the embankment shall have a minimum of one foot of freeboard above the maximum pool elevation, computed when the facility functions for the 100-year-return-period postdevelopment inflow. Also, the designed emergency spillway with one foot of freeboard shall have the capability to discharge the 100-year-return-period postdevelopment inflow. Should any stormwater management facility require a dam safety permit under PADEP Chapter 105 regulations, the facility shall be designed in accordance with PADEP Chapter 105.</i> Comment: The emergency spillways must demonstrate that they will safely convey the 100-year inflow and provide at least one foot of freeboard above the maximum pool elevation.

<u>Section</u>	<u>Description</u>
187-13 (A)	<i>Storm sewers must be able to convey post development runoff from a one-hundred-year-return-period storm without surcharging inlets.</i> Comment: The PCSM Report must be revised to include HGL Profiles in addition to the tables. HGL Profiles must be provided for all main trunk lines for the development and be shown on the profile sheets of the plan.
187-13 (B) (4)	<i>The minimum slope of any pipe shall be such that a minimum velocity of 2.5 fps is attained, however, the slope shall not be less than 0.5%. The maximum velocity in any storm pipe shall not exceed 12 fps.</i> Comment: The storm sewer tables in the PCSM Report show multiple instances of the minimum velocity not being attained.
187-14 (C)	<i>Time of concentration calculations shall be submitted as part of the overall stormwater management design report and shall utilize sheet flow "n" values consistent with the soil cover type selected.</i> Comment: • Flow assumptions (i.e. pipe full) must be clearly stated.
187-14 (G)	<i>Where uniform flow is anticipated, the Manning equation shall be used for hydraulic computations and to determine the capacity of open channels, pipes and storm sewers. Values for Manning's roughness coefficient (n) shall be consistent with Table A-4 in Appendix A⁴⁴ of this chapter Outlet structures for stormwater management facilities shall be designed to meet the performance standards of this chapter using inlet and/or outlet hydraulic controlling conditions by utilizing appropriate hydraulic analysis techniques or methods.</i> Comment: The Township Engineer's Office does not object to the concept of hydraulically interconnected basins modeled as singular volume, however it appears that some of the interconnecting equalizer pipes may cause routing effects. Calculations must be provided to assure this condition will not occur.
187-16 (B)(1)(c)	<i>The recharge facility shall be capable of completely infiltrating the recharge volume within four days (96 hours).</i> Comment: Dewatering calculations for each of the proposed BMP(s) must be provided.

<u>Section</u>	<u>Description</u>
187-16 (D)	<i>Extreme caution shall be exercised where infiltration is proposed in geologically susceptible areas such as strip mine or limestone areas. Extreme caution shall also be exercised where salt or chloride would be a pollutant since soils do little to filter this pollutant and it may contaminate the groundwater. Extreme caution shall be exercised where infiltration is proposed in source water protection areas. The qualified design professional shall evaluate the possibility of groundwater contamination from the proposed infiltration/recharge facility and perform a hydrogeologic justification study if necessary. The infiltration requirement in high quality/exceptional value waters shall be subject to the DEP's Title 25: Chapter 93 antidegradation regulations. The Township may require the installation of an impermeable liner in BMP and/or detention basins where the possibility of groundwater contamination exists. A detailed hydrogeologic investigation may be required by the Township.</i> Comment: Proposed stormwater basin facilities must have an impervious liner provided to prevent infiltration into contaminated areas.
187-21 (A)	<i>The drainage plan shall consist of all applicable calculations, maps and plans. A note on the maps shall refer to the associated computations and erosion and sediment control plan by title and date. The cover sheet of the computations and erosion and sediment control plan shall refer to the associated maps by title and date. All drainage plan materials shall be submitted to the Township of Falls in a format that is clear, concise, legible, neat and well organized; otherwise, the drainage plan shall be returned to the applicant/owner.</i> Comment: The Plans must have a note that references the ES Report and PCSM Report by title and date. The Plan and Report cross-reference notes must be updated with the latest revision dates prior to final approval.
187-21 (B)(2)(aa)	<i>A statement signed by the applicant/owner, acknowledging the stormwater management facility to be a permanent fixture that can be altered or removed only after approval of a revised plan by the Township of Falls..</i> Comment: This statement must be added to the Plan.
187-21 (B)(2)(dd)	<i>The location of all soil borings or test areas from the infiltration testing that correlates to the soil report.</i> Comment: The location of all soil borings or test areas from infiltration testing must be shown on the Plan.

TREE PROTECTION STANDARDS

<u>Section</u>	<u>Description</u>
199-4 (B)(6)(a)	<i>In accordance with §199-4 (B)(6)(a), "Every tree determined to be living and healthy, with a DBH of six inches or greater and which is designated to be removed or which is destroyed, shall be replaced with one or more new shade trees of a type approved by the Township with a trunk diameter of not less than three inches in caliper. The total caliper of replacement trees, measured at six inches above the ground line, shall equal or exceed the DBH of the tree removed".</i>

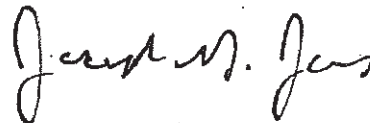
Comment: Tree replacement requirements that are in accordance with the Master Developer's Agreement must be addressed.

GENERAL COMMENTS

1. All comments from the Township Fire Marshal must be addressed.
2. All comments from the Township Traffic Engineer must be addressed.
3. The Township Engineer's Office recommends investigating possible slope armoring along basin walls for the proposed road drainage.
4. The applicant must provide clarification of the final disposition of Gamesa operations as it relates to this application and future construction.

Should you have any questions regarding this matter, please contact me at this office.

Very truly yours,



Joseph G. Jones, P.E., CFM
Township Engineer

cc: Mr. Peter Kim, Executive Director, Township of Falls Authority
Mr. Richard Dippolito, Fire Marshal
Michael Clarke, Esq., Clarke Gallagher Barbiero Amuso & Glassman, LLC
Randall C. Flager, Esq., Flager and Associates, PC
Ms. Lisa M. Wolff, Bucks County Planning Commission
Mr. Christopher Fazio, P.E., Remington and Vernick Engineers
Michael J. Meginniss, Esq., Begley, Carlin & Mandio, LLP
Allen W. Toadvine, Esq., Begley, Carlin & Mandio, LLP
Mr. Eric Clase, P.E., Gilmore & Associates
Mr. Jeremy Michael, NP Falls Township Industrial, LLC, Applicant



GILMORE & ASSOCIATES, INC.
ENGINEERING & CONSULTING SERVICES

June 20, 2025

G&A File No. 2020-07083-55

Mr. Matthew Takita, AIA, MCP, Township Manager
Falls Township Municipal Building
188 Lincoln Highway, Suite 100
Fairless Hills, PA 19030

RE: Preliminary and Final Land Development Application
Northpoint Area 3 Development
Sorrells Boulevard
TMP #13-051-001
Zoned: MPM (Materials Processing & Manufacturing)
Township of Falls, Bucks County, Pennsylvania

Dear Mr. Takita,

On behalf of *NP Falls Township Industrial, LLC*, the owners of the property located in Falls Township, Bucks County, PA, our office is resubmitting the following items via OneDrive link in email. A response letter to review comments is also provided with the resubmission for ease of review:

1. Final Subdivision and Land Development Plans for *Keystone Trade Center – Area 3 Development* dated June 20, 2025.
2. PCSM Report for *Keystone Trade Center – Area 3 Development* dated June 20, 2025.
3. E&S Report for *Keystone Trade Center – Area 3 Development* dated June 20, 2025.
4. Drainage Area Plans for *Keystone Trade Center – Area 3 Development* dated June 20, 2025.
5. Response Letter to Jones Engineering Review Letter

If you need any additional information, please do not hesitate to reach out. Thank you.

Sincerely,

Timothy M. Casey, P.E.
Sr. Project Manager | Gilmore & Associates, Inc.
tcasey@gilmore-assoc.com
267-914-7835

TMC/dpb



GILMORE & ASSOCIATES, INC.
ENGINEERING & CONSULTING SERVICES

January 17, 2025

File No. 2007083-55

Mr. Matthew Takita, AIA, MCP, Township Manager
Falls Township Municipal Building
188 Lincoln Highway, Suite 100
Fairless Hills, PA 19030

RE: Preliminary and Final Land Development Application
Keystone Trade Center-Area 3 Development
1 Ben Fairless Drive
TMP #13-051-001
Zoned: MPM (Materials Processing & Manufacturing)
Township of Falls, Bucks County, Pennsylvania
Plan Withdrawal Letter

Dear Mr. Takita,

On behalf of our client NP Falls Township Industrial, LLC, we request the previous Preliminary and Final Land Development Application for Keystone Trade Center-Area 3 Development, dated December 22, 2022, be withdrawn.

The plan layout has been revised and is being re-submitted as a Preliminary and Final Land Development Application for Keystone Trade Center-Area 3 Development, dated January 17, 2025.

If you have any questions or require additional assistance, please do not hesitate to call.

Sincerely,

Eric S. Clase, P.E., Executive Vice President of Land Design Services

Gilmore & Associates, Inc.

65 E. Butler Avenue, Suite 100, New Britain, PA 18901

Main: 215-345-4330 x369 | Fax: 267-898-2396

/ec

cc: Jeremy Michael, VP of Development, NorthPoint Development (via email)
Michael J. Meginniss, Esq., Begley, Carlin & Mandio, LLP, (via email)

65 East Butler Avenue | Suite 100 | New Britain, PA 18901 | Phone: 215-345-4330 | Fax: 215-345-8606