

June 3, 2025

Kim Kaufman
Township Manager
Mount Joy Township
8853 Elizabethtown Road
Elizabethtown, PA 17022

Via email: kkaufman@mtjoytwp.org

Re: Lancaster Seed Sales
Preliminary/Final Land Development Plan
Township Permit No.25-07-FLDP
LCEC Project No: 25-190



LANCASTER CIVIL
★ ★ engineering company ★ ★
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Dear Mr. Kaufman,

We have received a preliminary/final land development plan submission from D.C. Gohn Associates, Inc. for the above-referenced project. The submission consisted of the following documents:

- Comment response letter dated May 21, 2025
- Cover letter dated March 24, 2025
- Preliminary/Final Land Development Plans revised May 21, 2025
- Erosion and Sediment Control Plan revised May 21, 2025
- Post Construction Stormwater Management Report revised May 21, 2025
- Drainage Area Plan revised May 21, 2025
- Modification letter dated May 21, 2025
- Opinion of Probable Cost dated May 18, 2025
- PNDI Receipt dated February 2, 2025
- Steep Slopes Letter dated May 21, 2025
- Water and Sewer Feasibility Report dated May 21, 2025
- Act 38 Nutrient Management Plan dated January 2023
- Soil Conservation Plan dated May 2025
- Truck trip calculations

Based upon my review of the submitted information, I offer the following comments for the Township to consider:

Zoning Ordinance

1. At a Zoning Hearing Board meeting on March 5, 2025, the Board granted the following:
 - a. Variance from Section 135-83.H regarding the minimum 50' rear yard setback.
 - b. Variance from Section 135-85.I regarding the 25% maximum impervious coverage.
2. Prior to the expansion of an agricultural use, the landowner shall provide evidence from the Conservation District that a Conservation Plan is being implemented (135-212.D(1),(2),&(3)).

3. A clear sight triangle shall be shown at the proposed access points (135-299.E(2) & 119-31.D(12)).
4. Finished slopes of all cuts and fills shall not exceed 3:1, unless the applicant can satisfactorily demonstrate that the steeper slopes can be stabilized and maintained adequately (135-305.D(2)). The geologist's letter dated May 21, 2025 references the "Stormwater Infiltration Basin Slope Design" and only comments on the slopes of the stormwater basin. The geologist should also offer his opinion regarding the 2:1 slopes to the north of the proposed building.
5. Riparian corridors shall be established to include 30 feet on each side of the watercourse, measured from the top of each stream bank (135-306.B). Please note that the zoning definition of a watercourse includes not just streams and rivers, but ponds, lakes and other bodies of water, whether natural or artificial.
6. The applicant shall enter into a recordable agreement with the Township providing for the permanent maintenance of the riparian corridor, in a form acceptable to the Township Solicitor (135-306.F).

Subdivision and Land Development Ordinance

7. A preliminary plan is required (119-25). The applicant has requested a modification of this requirement.

Waiver response: The applicant proposes to process this as a preliminary/final plan which includes both preliminary and final plan requirements. This project is not phased and construction of public improvements is not scheduled to begin prior to plan recordation. Based on these considerations, I have no objection to a waiver of this requirement.

8. The "Boundary Line" linetype shown in the legend on Sheet 7 of the plans is inconsistent with the linetype of the property line shown on the plans (119-31.A(4)).
9. The plans shall be signed and sealed by a registered engineer, surveyor or landscape architect (119-31.A(5)).
10. The water and sewer feasibility report shall depict possible connections to the existing public and water sewer system within 3,000 feet of the proposed land development or the distance from the project to the nearest point in the public sewer/water systems (119-32.A & 119-35.E(3)(b)).
11. The wetlands study shall be provided for the entire site (119-32.B). The applicant has requested a modification of this requirement.

Modification response: The applicant is requesting to provide a wetland study of the project site area rather than the entire site. The entire limits of disturbance and proposed site improvements were included in the wetland study. Per the applicant, there are no hydric soils on the subject tract. Based on these considerations, I have no objections to a waiver of this requirement.

12. All certificates shall be executed prior to final plan approval (119-35.E).
13. Written notice shall be provided from the DEP that approval of the sewer planning module has been granted or notice from the Department that such approval is not required (119-35.E(2)(a) & 119-60.A).
14. Written notices from the emergency service providers that will serve as the primary responders for the land development shall be submitted indicating that the building layout is satisfactory and will not present any obstacles or other problems for emergency responders to the land development (119-35.E.(2)(h)).

15. A Stormwater Management Agreement and Declaration of Easement in a form acceptable to the Township Solicitor shall be executed and recorded (119-35.E(4)(c), 119-56.E & 113-62).
16. A land development agreement in a form acceptable to the Township Solicitor shall be executed (119-35.E(4)(f)).
17. Financial security shall be provided (119-41 & 113-60). The Opinion of Probable Cost shall include costs for the trash rack (outlet structure), notice of termination, bulk/finish grading, and the topsoil stockpile. The quantities for the 12" SLHDPE shall be corrected.
18. The frontage along Homestead Road (a local street) shall be improved in accordance with 119-52.J or as indicated on the Township Official Map, whichever is greater. Improvements shall include pavement widening and dedication of additional right-of-way (119-52.J(3)(a)). The required right-of-way for a local street outside of the urban growth area is 50 feet, and the required cartway width is 24 feet. The applicant has requested a waiver of this requirement.

Waiver response: The applicant has requested a waiver from providing additional right-of-way and widening the existing cartway. The existing right-of-way is 33 feet and the cartway width ranges from 18.5 to 19 feet, which does not meet PennDOT's minimum required width for rural local roads (22 feet), nor the Township's minimum required width of 24 feet. The applicant indicates that there are no new employees and no new truck traffic anticipated as part of the proposed development. The access on Homestead Road will remain the same following the proposed development. However, since the existing road is well below Township and State standards for minimum road widths and the use of this property generates daily truck traffic, I am unable to support a waiver of the cartway widening requirement. I have no objection to deferral of the right-of-way requirements with the condition a deferral agreement be executed in a form acceptable to the Township Solicitor.

19. If the Township determines that the road improvements required by 119-52.J(3)(a) are not feasible at the time of development, the developer shall deposit funds with the Township in the amount of 110% of the cost of improvements, or the applicant shall enter into an agreement that would defer road improvements to a time the Township would deem such road improvements as feasible (119-52.J(3)(d)).
20. Three monuments shall be spaced around the proposed project, with at least two of the monuments placed as consecutive corners along the street right-of-way (119-57.B). The applicant has requested a waiver of this requirement.

Waiver response: The ordinance permits tract boundaries to be deed plotted for tracts over 10 acres. The subject tract is 11.939 acres. Deed plotting is based on the property description from recorded deeds, not a field survey of property corners, boundary lines, and existing rights of way. Therefore, the existing right-of-way is not surveyed. Based on these considerations, I have no objections to a waiver of this requirement; however, if the Township does not waive or defer the required proposed right-of-way, I recommend concrete monuments be set at the street right-of-way.

21. Lot line markers shall be set at the street right-of-way, at all angles in property lines and at the intersection of all other property lines (119-57.D). The applicant has requested a waiver of this requirement.

Waiver response: The ordinance permits tract boundaries to be deed plotted for tracts over 10 acres. The subject tract is 11.939 acres. Deed plotting is based on the property description from recorded deeds, not a field survey of property corners, boundary lines, and existing rights of way. Therefore, the existing right-of-way is not surveyed. Based on these considerations, I have no objections to a waiver of this requirement; however, if the Township does not waive

or defer the required proposed right-of-way, I recommend lot line markers be set at the street right-of-way.

22. Any action taken on waiver requests, dates, and any conditions of approval shall be added to the cover sheet (119-91.C & 113-96).

Stormwater Management Ordinance

23. Evidence of NPDES and E&S permit approval by the Lancaster County Conservation District shall be provided (113-31.D, 113-45.B & 113-45.C).
24. The proposed access easements shall be revised so they do not conflict with the existing building and the retaining wall (113-31.Q).
25. The Ordinance requires the loading ratio for the total drainage area to infiltration area to be less than 8:1 and the impervious drainage area to infiltration area to be less than 5:1 (113-32.A.(2)(c)). A total loading ratio of 19:1 and an impervious loading ratio of 10:1 are provided; a modification is being requested, however per Ordinance 312-2017 the Township Engineer can approve higher loading ratios.

Approval response: The loading ratio guideline is a recommendation intended to prevent infiltration of a substantial volume of water in a very small area (especially in Karst areas), to limit excessive depth of water in infiltration facilities and to avoid lengthy dewatering/drawdown times. The proposed Infiltration Basin 1 is not in a Karst area and has been designed to capture a depth of 1.76 feet for the 2 year storm with a dewatering time of less than 2 hours, which will mitigate each of the risk factors described above. Given these considerations, I have no objection to the higher ratios with the condition at least two (2) feet of amended soils are provided in Infiltration Basin 1 to help mitigate the extremely fast dewatering times

26. The "Total Drainage Area" and "Total Impervious Area" shown in loading ratio calculations (Table 10) are inconsistent with the total and impervious areas shown in the post-development "Total to Infiltration Basin 1" runoff coefficient calculation (113-32.A.(2)(c)).
27. Minimum floor elevations for all structures that would be affected by open conveyance systems where ponding may occur shall be two feet above the one-hundred-year water surface elevation (113-34.F). The proposed building is less than two feet above Inlets I-B2 and I-B3 and the seed processing building.
28. The data used to determine the rainfall intensity from NOAA Atlas 14 data or PennDOT Publication 584, PennDOT Drainage Manual, shall be provided (113-35.D).
29. The landowner shall execute the final documents prior to final plan approval (113-41.B).
30. A note identifying any recorded stormwater management agreements affecting the subject property (or that none exist) shall be included on the plans (113-43.I(6)).
31. The proposed grade line shown on the I-A1 to FES-A vertical profile is inconsistent with the top of berm elevation shown on the profile (113-43.J(5)).
32. An operation and maintenance (O&M) agreement shall be provided and recorded with the final plan (113-62).

If you should have any questions or need additional information, please do not hesitate to contact me at bencraddock@lancastercivil.com or via telephone at 717-799-8599.

Sincerely,

A handwritten signature in blue ink that reads "Benjamin S. Craddock". The signature is written in a cursive, flowing style.

Benjamin S. Craddock, PE, President

LANCASTER CIVIL

cc: Joseph Price, Community Development Director/Zoning Officer (via email)
Justin Evans, Assistant Zoning Officer (via email)
Patricia Bailey, Township Secretary / Assistant Zoning Officer (via email)
Josele Cleary, Esquire, Township Solicitor (via email)
Renee Addleman, Planner, LCPC (via email)
Brian Cooley, D.C. Gohn (via email)