

January 22, 2026

Matt Mandia
Township Manager
Mount Joy Township
8853 Elizabethtown Road
Elizabethtown, PA 17022

Via email: matt@mtjoytp.org



LANCASTER CIVIL
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Re: Westmount
Preliminary Plan
Township Permit No. 24-19-PLDP
LCEC Project No: 25-134

Dear Mr. Mandia,

We have received a preliminary lot add-on, subdivision & land development plan submission from ELA Group, Inc. The submission consisted of the following documents:

- Response letter dated December 23, 2025
- Preliminary Lot Add-On, Subdivision & Land Development Plan rev. December 23, 2025
- PCSM Report revised December 23, 2025
- Erosion and Sediment Control Plan revised December 23, 2025

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

Zoning Ordinance

1. Additional detail shall be provided for the pocket park on the final plan to confirm that the midblock separator requirement is adequately met (135-262.J). We recommend that this information be provided as part of the preliminary plan approval process.

Subdivision and Land Development Ordinance

2. There are several instances of overlapping/obscured/cut off text that shall be resolved (119-31.A(4)).
3. The plans shall be signed and sealed by a registered engineer, surveyor or landscape architect (119-31.A(5)).
4. Either a copy of the PennDOT HOP shall be provided prior to plan recording, or a certificate in accordance with Appendix No. 1 shall be added to the plan for the proposed street intersections (including the existing gravel driveway) (119-31.D(8)).
5. All certificates shall be executed prior to preliminary plan approval (119-34-E(1)).
6. A note stating any condition regarding the use of the land, minimum building setback or right-of-way lines for the PP&L easement shall be included on the plan (119-34.E(2)(a)).
7. A note stating any condition regarding the use of the land, minimum building setback or right-of-way lines for the Amtrak easement shall be included on the plan (119-34.E(2)(a)).

8. All proposed subdivision and land developments shall be designed, laid out, arranged, constructed and coordinated with all presently existing facilities and improvements which serve the tract (119-51.A(2)). The Final Subdivision Plan for Bradfield Phase Two recorded as Instrument No. J-212-0142 shows a temporary cul-de-sac easement and a PennDOT Type III Barricade at the existing turnaround located on the adjacent "Donegal Crossing Associates" property, which are proposed to be removed.
 - a. The proposed four (4) parking spaces in front of the Donegal Crossing Associates property prevent the future extension of sidewalk along Bradford Drive. The existing 28' cartway width for Bradford Drive is adequate to provide parking on one side.
 - b. If the four (4) parking spaces are installed, I recommend that a pedestrian easement be provided to for future construction of sidewalk along the proposed parking spaces.
9. The developer shall take all necessary action to obtain PennDOT permits and/or approvals to install the necessary improvements to the state roadway (119-52.J(3)(e)).
10. The area within the future right-of-way shall be included in the deeds of the abutting lots with an easement in favor of the Township and the landowners of the land in which the future right-of-way will extend to permit the use of the future right-of-way for public street purposes should the adjoining lands be developed (119-52.N(1)).
11. The applicant shall address the traffic engineering comments provided by Traffic Planning and Design dated January 21, 2026 (119-52.S(4)(c)).
12. Access to and from the shed via the proposed gravel driveway on the adjacent "Donegal Crossing Associates" property is blocked by a proposed parking space (119-52.S(4)(c)[2]).
13. Not less than a two-foot radius of curvature shall be permitted for a parking facility (119-53.A(4)). The parallel parking serving the adjacent "Donegal Crossing Associates" property shall meet this requirement.
14. Drainage easements shall be provided for all proposed swales and all stormwater facilities. Drainage easements shall be a minimum of 30 feet wide (119-56.E). The applicant has requested a waiver of providing a minimum 30 feet wide drainage easement.

Waiver response: The majority of the proposed drainage easements are 30 feet wide; however, there are a few easements which are 20 and/or 25 feet wide. It is not possible to provide 30 feet wide easements at these locations due to the proposed building locations. Based on these considerations, I have no objections to a waiver of this requirement.
15. A legal description of the proposed snow removal easement shall be provided prior to approval of the final plan (119-56.G).
16. A legal description of these pedestrian easements shall be provided prior to approval of the final plan (119-56.G).
17. Recreational areas and facilities shall be provided. It appears that the developer intends to establish, at least partially, a privately reserved recreation and open space area (i.e. Tot Lots); however this should be clarified with a note on the plan. A privately reserved recreation and open space area would require a modification from the mandatory dedication requirement. We recommend that this modification be requested as part of the preliminary plan approval process. A written agreement between the developer and the Township, which specifies the developer's obligations, must be executed prior to final

plan approval. This agreement must be in a form and have specific content that is acceptable to the Township Solicitor. A restrictive covenant shall also be included in the deed. The developer shall solicit feedback from the Park and Recreation Board and the Board of Supervisors on the proposed recreation areas (119-61). Please note that the minimum lot area which shall be dedicated is 15.606 acres (289 dwelling units x 0.054 acre per dwelling unit).

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

Stormwater Management Ordinance

19. The following erosion and sediment control items shall be addressed (113-31.E & 113-43.K):

- a. There are numerous areas where it appears additional E&S controls are needed downslope of disturbed areas.
 - b. A topsoil stockpile shall be provided for the topsoil removed in Steps 19 and 20 in "Stage 1 Construction Sequence". It is assumed that a stockpile shall be provided on the north side of the railroad tracks for this work; however, if that is not the intent, then the sequence should clearly describe how the topsoil removed in Steps 19 and 20 is to be handled.
 - c. Please note that the proposed "Stabilized Access Path" and "RCE #2" shown on the adjacent Hess property will require a temporary construction easement prior to final plan approval.
 - d. The proposed Sediment Basin 5 shown on Sheet 12 of the plans is obscured by the other proposed improvements (e.g. buildings, final BMPs, paving, etc.) shown on the plans.
 - e. There are numerous conflicts between the proposed filter socks and the proposed grading/stormwater features (e.g. swales, BMPs, etc.).
 - f. For Sock ID CFS #2, the Sock Size shown in the ES Worksheet is inconsistent with the diameter shown on the plans.
 - g. The Grass Lined Channel detail shows S75 matting for Swale 18; however, the E&S plans do not show matting.
20. Stormwater management basins shall not be located closer than 100 feet from the rim of sinkholes (113-31.J(2)). SD-1 is closer than 100 feet to BMP 26 and sinkhole/subsidence feature SD-2 is closer than 100 feet to BMP 20. The applicant has requested a modification of this requirement

Modification response: The proposed BMPs will reduce the amount of runoff reaching the existing sinkhole/subsidence features. In addition, the plans propose remediation of the sinkhole/subsidence features under the supervision of a qualified professional prior to construction of BMPs 20 and 26. Finally, there are two feet of amended soils proposed in BMPs 20 and 26, which will provide protection of the underlying groundwater. Based on these considerations, I have no objections to a waiver of this requirement.

21. A minimum depth of 24 inches shall be provided between the bottom of BMP 23 and the bedrock limiting zone (113-31.L(1)). The applicant has requested a modification of this requirement.

Modification response: The plans propose that bedrock, where encountered, be removed to two feet below the BMP subgrade elevation and four feet of amended soils be provided from the excavated bedrock to the BMP bottom elevation. This will provide a minimum

24" separation to a bedrock limiting zone. Based on these considerations, I have no objections to a modification of this requirement.

22. The Ordinance requires the loading ratio for the total drainage area to infiltration area to be less than 5:1 and the impervious drainage area to infiltration area to be less than 3:1 in karst areas (113-32.A.(2)(c)). A total loading ratio of 7.0:1 for BMP 15, 6.6:1 for BMP 23, and 16.8:1 for BMP 26 are provided. A total loading ratio of 10.6:1 and an impervious loading ratio of 3.2:1 are provided for BMP 20. Per Ordinance 312-2017 the Township Engineer can approve higher loading ratios.

Approval response: For BMPs 15, 20, and 26, a marginal infiltration rate is provided (i.e. underlying soils have limited capacity for infiltration) which minimizes risk for karst feature formation. For BMPs 15, 23, and 26, the impervious loading ratios meet the Ordinance requirements. Impervious areas contribute more volume runoff than non-impervious areas. Each BMP provides an orifice in the outlet structure that limits the depth and dewatering time of ponded water in the BMP. Soil amendment and plantings are proposed for all BMPs which will maximize evapotranspiration. Given these considerations, I have no objection to the higher ratios.

23. Calculations (i.e. Inlet Reports) shall be provided for the 100-year storm for all inlets (113-34.G(3)).
24. Runoff coefficient and hydrology calculations shall be provided for Swales 22, 23, and 24 (the discharges with the associated inlets / headwalls are inconsistent with the discharges shown in the swale calculations) (113-35.F).
25. Based on the proposed depth shown in the conveyance calculations and the proposed contours/top of grate elevation, flows will bypass Inlet I-799A (113-35.F).
26. Post-development runoff coefficients for pipes that convey off-site discharges shall be based on winter or poor land use conditions (113-35.G). Inlets I-799, I-810, I-811, I-814, I-815, I-830, and I-831 shall meet this requirement.
27. A time of concentration calculation shall be provided for the HW-6B/Swale 15, Swale 6/I-799, Swale 7/I-811, Swale 8/I-815, I-837/Swale 16D, Swale 17A, Swale 17B, and Inlets I-831, I-811, I-830, and I-832 (113-35.H(2)). The time of concentration paths shall be shown on the Inlet Watershed Maps.
28. One foot of pipe cover shall be provided to the stone subgrade in vehicular areas (113-37.C(1)(a)[3]). The applicant has requested a waiver of this requirement.

Waiver response: The applicant is requesting a waiver for pipes between Inlets I-4 and I-5, I-9 and I-10, and Manhole MH-8A and Inlet I-9. Reinforced concrete pipes are proposed between Inlets I-4 and I-5 and between Inlets I-9 and I-10. The pipe between Manhole MH-8A and I-9 is not within a vehicular area. In addition, the applicant indicates that temporary cover can be provided for the pipe between Inlets I-9 and I-10 during construction. Based on these considerations, I have no objections to a waiver of this requirement.

29. The longitudinal slope for inlets on grade shall typically equal the slope of the roadway centerline (113-37.C(4)). This shall be corrected for Inlets I-64, I-45, and I-46.
30. The Bypass Line No. entries within the Hydraflow Storm Sewer calculations for Lines 86 and 108 shall be corrected (113-37.C(4)).
31. The gutter spread based on the twenty-five-year storm shall be no greater than $\frac{1}{2}$ of the travel lane (113-37.C(4)(b)). This shall be corrected for inlets I-77 and I-787B.

32. Type 'C' inlets shall be provided along curbed streets (113-37.C(4)(d)[2]). The applicant has requested a waiver of this requirement.

Waiver response: The applicant is requesting to provide Type 'M' Inlets for Inlets I-53 and I-53A along the curbed access drive on Lot 2. The proposed Type 'M' inlets are needed to provide the necessary drainage at a location where Type 'C' inlets would be infeasible due to slant to vertical concrete curb transitions. Based on these considerations, I have no objections to a waiver of this requirement.

33. There are numerous side slopes shown in the Grass Line Channel detail which are inconsistent with proposed grading/contours shown on the plans (113-37.C(5)).
34. For Swales 11 and 19, there are inconsistencies between the information shown in the Grass Line Channel detail and the information shown in the "Channel Design Data worksheet" in the PCSM Report (113-37.C(5)).
35. The current design creates defined a man-made ditch near Swale 13 that conveys flow to proposed stormwater management facilities; therefore, a swale design (including drainage areas, calculations and construction details) shall be provided (113-37.C(5)(a)).
36. All swales (except Swale 1A) shall be evaluated for stability based upon the "n" = 0.03 value. (Currently Swale 1A is the only swale that is being evaluated for stability using this "n" value.) Swale 1A shall be evaluated for capacity based upon the "n" = 0.05 value (Currently Swale 1A is the only swale that is not being evaluated for capacity using this "n" value) (113-37.C(5)(c)[1][a]).
37. Design information/calculations shall be provided for the riprap apron for Endwall EW-997 (113-37.C(8)).
38. The plan should be clearly and legibly drawn (113-42.A & 113-54.C). The plans and drainage area maps contain numerous overlapping labels/text, as well as multi-leaders that do not point to the feature referenced in the label. All stormwater features shall be labeled on the plans. Refer to the accompanying markups of the plans for specific instances.
39. A profile shall be provided for the pipe run from the proposed inlet to Manhole MH-22 (113-43.J(5)). The inlet shall be labeled on the plans.
40. A construction detail shall be provided for the proposed trench drains TD-77A, TD-604, TD-791, TD-814, and TD-825 (113-43.J(5)).
41. The length and slope of the pipe between OCS-14 and Manhole MH-887A on the BMP 14 to EW-8 profile are inconsistent with the length and slope of the outlet pipe on the "Township" BMP 14 pond report (113-43.J(5)).
42. The maximum cover elevation for BMP No. 22 is inconsistent with the elevation shown on the shop drawing (113-43.J(5)).
43. The pipe diameter I-799A to I-799 (Line 59) in the Hydraflow Storm Sewer calculations is inconsistent with the pipe diameter shown in the I-799A to WQU-808A profile (113-43.J(5)).
44. For trench drains I-791 and I-77A, the grate length and width shown in the Hydraflow Inlet Reports are inconsistent with the grate length and width shown on the plans (113-43.J(5)).
45. The area of the drainage areas of the roof leaders shown on Sheet 96 of the plans exceeds all the areas shown in the Roof Leader Capacity Calculations worksheet in the PCSM

Report and the "Contributing Roof Areas" shown in the chart in the Typical Connection To Downspout With Intermediate Cleanout detail (Sheet 70) (113-43.J(5)).

46. Since a PennDOT Highway Occupancy Permit is required for the proposed driveway alterations, the permit(s) shall be part of the SWM site plan and must be obtained prior to unconditional SWM site plan approval (113-45.C).

Traffic

47. The proposed development is located within the Transportation Service Area established for the Mount Joy Township Traffic Impact Fee Ordinance. Therefore, the development shall be assessed a traffic impact fee based on the number of new P.M. peak hour trips generated by the development. Based on the number of P.M. peak hour trips from the approved Traffic Impact Study, the calculation of this fee would be as follows:

$$177 \text{ new P.M. peak hour trips} \times \$1,766/\text{new P.M. peak hour trip} = \$312,582$$

The impact fee is payable at the time of building permit issuance.

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,



Benjamin S. Craddock, PE, President

LANCASTER CIVIL

cc: Justin Evans, Township Assistant Zoning Officer (via email)
Patricia Bailey, Township Secretary/Assistant Zoning Officer (via email)
Josele Cleary, Esquire, Township Solicitor (via email)
Christopher Lincoln, PE, Traffic Planning & Design (via email)
Austin Calaman, EAWA (via email)
Michele Powl, EAWA (via email)
Steve Rettew, ERSa (via email)
Abraham King, RETTEW (via email)
Renee Addleman, Planner, LCPC (via email)
Eric Hout, Lancaster County Conservation District (via email)
Brent Good, RLA, Westmount (via email)
Brandon Conrad, Vistablock (via email)

**PROPOSED MOTION FOR THE
PRELIMINARY LOT ADD-ON, SUBDIVISION & LAND DEVELOPMENT PLAN
FOR WESTMOUNT
M.J.T.P.C. File # 24-19-PLDP**

I move that the Township Planning Commission grant the following waivers of Chapters 113 and 119 of the Code of Ordinances of the Township of Mount Joy, i.e. the Mount Joy Township Storm Water Management Ordinance and the Subdivision and Land Development Ordinance as follows:

- (1) §119-56.E – easement width
- (2) §113-31.J(2) – stormwater management basin setback from sinkholes
- (3) §113-31.L(1) – depth to limiting zone
- (4) §113-37.C(1)(a)[3] – pipe cover
- (5) §113-37.C(4)(d)[2] – inlet type

And having granted such waivers, grant approval of Preliminary Lot Add-On, Subdivision & Land Development Plan for Westmount, prepared by ELA Group, Inc., Drawing No. 1212-004, dated October 7, 2024, subject to the following conditions:

1. To the extent not otherwise provided in these conditions, Applicant shall address the comments of the Township Engineer's review letter dated January 22, 2026.
2. To the extent not otherwise provided in these conditions, Applicant shall address the comments of the Township Solicitor's review letter dated October 26, 2024.
3. Applicant shall pay Mount Joy Township traffic impact fees, as required by Chapter 125 of the Code of Ordinances of the Township of Mount Joy, in the total dollar amount of \$312,582.00 (177 P.M. peak hour trips @ \$1,766/trip). Payment of the traffic impact fees shall be made at the time an application is made for the required building permit. Applicant shall not at any time in the future seek return of such impact fees, or any earned accrued interest thereon, or authorize any successor to make such claim, whether or not the Township expends the traffic impact fees within the time limitations set forth in Act 209 of 1990, as amended, 53 P.S. §10501-A, et seq., expends the traffic impact fees for improvements set forth in the Transportation Capital Improvements Plan or for other road improvements not addressed in the Transportation Capital Improvements Plan or for road improvements to address existing deficiencies or for improvements (regardless of the percentage of the cost of improvements or the amount of the improvements paid for with traffic impact fees) to state highways. Applicant shall place a note on the final plan referencing this condition.
4. Applicant shall pay a fee-in-lieu of dedication of recreation land in accordance with §119-61 prior to the release of the Final Plan for recording, unless otherwise modified by the Mount Joy Township Board of Supervisors. Applicant shall waive any right to request any refund of such fee is not expended within any required time period. This fee shall be calculated at the time of Final Plan submission.
5. Applicant shall apply for and obtain all necessary permits prior to commencing any construction activities.

6. Applicant shall reimburse the Township for all reasonable engineering and legal fees incurred in the review of plans under the Subdivision and Land Development Ordinance, Storm Water Management Ordinance, and other governing ordinances; review or preparation of documentation required in connection with the development; review and approval of financial security and other documentation; inspection of improvements; and for other costs as set forth in these Conditions within 30 days after receipt of an invoice for such fees. If Applicant fails to pay such costs within 30 days after the date of a written invoice for such costs, Applicant shall be in violation of this Condition.

**ACCEPTANCE OF CONDITIONS UPON APPROVAL OF A
PRELIMINARY LOT ADD-ON, SUBDIVISION & LAND DEVELOPMENT PLAN
IMPOSED BY THE PLANNING COMMISSION OF MOUNT JOY TOWNSHIP
FOR**

**WESTMOUNT
M.J.T.P.C. File # 24-19-PLDP**

I have reviewed the conditions imposed by the Planning Commission of Mount Joy Township, Lancaster County, Pennsylvania, at the meeting on January 29, 2026, upon the approval of the Preliminary Lot Add-On, Subdivision & Land Development Plan for Westmount, prepared by ELA Group, Inc., Drawing No. 1212-004, dated October 7, 2024. In my capacity as developer/developer's agent and being authorized to do so, and intending to be legally bound, I hereby accept the imposition of the conditions attached hereto as part of the approval of the above-described subdivision and/or land development project. I expressly waive any requirements of the Pennsylvania Municipalities Planning Code that the Township provide a section number of a governing ordinance, statute or regulation upon which such conditions are based and a description of the requirements which have not been met. To the extent that any condition is not based upon a specific requirement of a governing ordinance, statute or regulation, I expressly waive any right which I may have to challenge the imposition of such condition. If signing as developer's agent, I expressly state that I have been authorized by developer to agree to the conditions imposed upon the approval of the above-described subdivision and/or land development application.

Date: _____

Signature

Printed Name

Title