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April 11, 2025

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

**RE: Sheetz – Elizabethtown, PA (Veterans Drive)  
Modification Request  
Mount Joy Township  
RGS Project No: 2024A84-019**

Dear Mr. Kaufman:

RGS Associates, on behalf of Sheetz, Inc., respectfully requests the following modifications associated with the Preliminary/Final Plan:

**Subdivision and Land Development Ordinance**

**1. SECTION 119-25.C(2): PRELIMINARY PLAN**

***Requirement:***

*Preliminary land development plan. The preliminary land development plan is to be filed whenever land development approval is sought unless a minor land development plan may be properly submitted.*

***Proposed Relief:***

**We are requesting a waiver of the preliminary plan requirement to process the land development plan for this project as a Preliminary/Final Plan.**

***Justification:***

All plan requirements for both Preliminary Plan and Final Plan will be provided on one plan. Both the preliminary and final plans would appear virtually the same; there is no phasing proposed and a Final Plan would provide equal results to providing separate Preliminary and Final Plans. Lastly, no subdivision or public streets are proposed.

**2. SECTION 119-52.J.3.A – IMPROVEMENTS OF EXISTING STREETS AND INTERSECTIONS, CURBING OF EXISTING STREETS**

***Requirement:***

*In cases where a subdivision or land development abuts an existing Township and/or state street, the street shall be improved to the ultimate width in accordance with Subsection J or as indicated on the Township Official Map, whichever is greater, and additional right-of-way shall be provided,*

*concrete curbing and sidewalk, and any other street improvements that are required by this chapter, shall be constructed.*

***Proposed Relief:***

**The proposed plan requests a deferral of sidewalk and vertical curbing along Veterans Drive, Old Hershey Road, and Hershey Road frontages.**

***Justification:***

Regarding the deferral of sidewalk along the frontages of Veterans Drive, Old Hershey Road, and Hershey Road, there is no existing sidewalk along adjoining lots that would connect pedestrian traffic from the site to these pathways. The only existing sidewalk located near the site is on the opposite side of Old Hershey Road which we provide a connection to via a proposed crosswalk and sidewalk that allows pedestrians to travel from the residential uses to the site. Veterans Drive does not currently have existing infrastructure that supports pedestrian movement. There are no existing sidewalks or pathways where pedestrians can use to access the site. Proposing sidewalk along the street frontage of Veterans Drive is a safety concern as the sidewalk would direct people to a State Route with heavy vehicular traffic. Also, on the northeastern portion of the site there is an existing wetland which prevents infrastructure within the wetland buffer. A sidewalk along this frontage would not be possible as the wetlands area would prevent the sidewalk from extending to the Veterans Drive and Hershey Road intersection. Lastly, Hershey Road is a state route (SR 743) and has a posted speed limit sign of 45 mph. Proposing a sidewalk along this street frontage poses major safety concerns given the roadway speed rating. In addition, there are no existing sidewalks along Hershey Road to connect pedestrian movement to.

Regarding the deferral of vertical curbing along the frontages of Veterans Drive, Old Hershey Road, and Hershey Road there is no existing vertical curbing that would connect to the proposed vertical curbing as all three street frontages do not have any curbing.

**3. SECTION 119-52.K(4) – CARTWAY EDGE TANGENTIAL ARC RADIUS**

***Requirement:***

*The cartway edge at street intersections shall be rounded by a tangential arc with a minimum radius of 25 feet for local streets or alleys and 35 feet for intersections involving collector and arterial streets.*

***Proposed Relief:***

**The proposed plan requests a modification to implement radii at 14.5' in radius at Veterans Drive.**

***Justification:***

The existing access drive connection to Veterans Drive has curb radii of 15 feet that was shown on the previously approved land development plan titled "Final Land Development Plan for Vita, Inc." which was constructed. The proposed access drive maintains the same general location of the existing access drive and proposes radii of 14.5 feet that is similar to the existing condition. An attached exhibit titled "2025-1-24 – Modification Request Exhibits" shows the radii

requirement of 35 feet and how it would extend the drive deep into the site causing the proposed development to be unfeasible. Also, the 35-foot radii would cause the ingress and egress of the access drive to be extremely wide as shown on the exhibit. The lot proposed for redevelopment is an existing, narrow condition. The lot is not created by the applicant. The existing depth of the lot does not allow for a 35' radius without drastically affecting the reasonable development of the property.

**4. SECTION 119-52.S.3.(D) – ACCESS DRIVE SEPARATION WITHIN 200' OF INTERSECTION OF STREETS**

***Requirement:***

*Access drives shall be separated by 200 feet from any other access drive intersection with a street and any other intersections of two streets.*

***Proposed Relief:***

**The proposed plan requests a modification to permit a minimum separation of 108 feet along Veterans Drive and 158 feet along Old Hershey Road.**

***Justification:***

In the existing conditions there are two (2) access drives that currently do not meet the minimum separation requirement of 200 feet from any other access drive intersection with a street and any other intersections of two streets. The existing access drive along Veterans Drive is currently separated from the access drive on the opposite side of the roadway by roughly 86 feet. The existing access drive along Old Hershey Road is currently separated from the intersection of Old Hershey Road and Rockwood Drive by roughly 141 feet. In the proposed conditions, the separation distances for both access drives increase but not to the extent that satisfies the 200-foot requirement. The proposed access drive along Veterans Drive proposes a separation distance of 108 feet and the proposed access drive along Old Hershey Road proposed a separation distance of 158 feet. The existing and proposed dimensions can be seen in the attached exhibit titled "2025-1-24 - Modification Request Exhibits." The site itself also limits the location of the access drives on both Veterans Drive and Old Hershey Road. For Veterans Drive, there is an existing Wetland on the northeastern side of the site and the western side of the site there is a parcel on the corner of the intersection of Veterans Drive and Old Hershey Road that is not owned by the applicant. For Old Hershey Road there is minimal frontage where an access drive can be proposed.

**5. SECTION 119-53.B.1: SIDEWALKS ALONG EXISTING STREETS**

***Requirement:***

*Paved sidewalks shall be provided along the frontage of existing streets and on both sides of a new street and access drive that serve all subdivisions and land developments, with the exception to those subdivisions or land developments located outside the adopted designated growth area, as indicated in the Township Comprehensive Plan. The Township may require sidewalks outside the designated growth area if the subdivision or land development is located.*

***Proposed Relief:***

**The proposed plan requests a waiver to not implement the sidewalk along Old Hershey Road, both sides of Veterans Drive, and along Hershey Road.**

***Justification:***

The existing site currently has one designated walkway and striping that connects pedestrian traffic from the site to the residential uses along Old Hershey Road via a striped pavement walkway and a striped crosswalk. In the land development plan we are maintaining this access through proposing a sidewalk in the same location as the existing walkway with a proposed crosswalk to allow for pedestrian access to Old Hershey Road.

For Veterans Drive there is no existing sidewalk along the access drive or frontage to provide access to the site. There is no sidewalk on the opposite side of the street either or along the frontage where a possible connection could be made. Proposing sidewalk along the access drive would not support pedestrian movement as there is no connecting pathways or sidewalk where the pedestrians can go. Also, Veterans Drive is connected to a state road where there are no crosswalks or sidewalks. Proposing a sidewalk along the access drive connecting to Veterans Drive would create a safety hazard to the pedestrians as they would be directed straight to the roadway.

Hershey Road is a state route (SR 743) and has a posted speed limit sign of 45 mph. Proposing a sidewalk along this street frontage poses major safety concerns given the roadway speed rating. In addition, there are no existing sidewalks along Hershey Road to connect pedestrian movement to or nearby infrastructure that would support pedestrian travel.

**6. SECTION 119.53.B(4)(A): SIDEWALK CONSTRUCTION STANDARDS**

***Requirement:***

*Paved sidewalks shall be constructed in accordance with Appendix No. 16 and PennDOT Publication 408, Specifications, and PennDOT Publication 72, Standards for Roadway Construction, and in accordance with any regulations adopted by the state or federal government concerning handicapped accessibility.*

***Proposed Relief:***

**The proposed plan requests a modification to allow the sidewalk to be a minimum of four feet wide.**

***Justification:***

The lot proposed for redevelopment is an existing, narrow condition. The lot is not created by the applicant. The existing depth of the lot does not allow for a wider sidewalk due to minimum internal drive aisle widths, or without reducing the lot driveway radius. On the southern side the sidewalk the landscape strip will not allow sidewalk within it per the ordinance requirements. On the northern side of the sidewalk the access drive cannot be shifted due to the drive aisle widths being 25' on each side of the canopy which is the requirement. The canopy also cannot be shifted due to the Sheetz Standards for the location relationship between the canopy and the building. Lastly, the shift of the canopy to the north would in turn create smaller radii for the curbs of the access drive connecting to Veterans Drive.

**7. SECTION 119-53.B(10): GRASS PLANTING STRIP**

***Requirement:***

*A minimum of a four-foot-wide grass planting strip shall be provided between the back of the curb and the edge of the sidewalk.*

***Proposed Relief:***

**The proposed plan requests a waiver to not implement the four-foot wide grass planting strip between the back of curb and the edge of sidewalk along the proposed sidewalk along the access drive from Old Hershey Road.**

***Justification:***

The existing site does not have a four-foot wide grass planting strip along the sidewalk from the access drive from Old Hershey Road. In the proposed condition, the sidewalk cannot incorporate the four-foot wide grass planting strip as the sidewalk cannot move north or south from the current location. The lot proposed for redevelopment is an existing, narrow condition. The lot is not created by the applicant. The existing depth of the lot does not allow for a four-foot grass planting strip due to minimum internal drive aisle widths, or without reducing the lot driveway radius. On the southern side the sidewalk the landscape strip will not allow sidewalk within it per the ordinance requirements. On the northern side of the sidewalk the access drive cannot be shifted due to the drive aisle widths being 25' on each side of the canopy which is the requirement. The canopy also cannot be shifted due to the Sheetz Standards for the location relationship between the canopy and the building. Lastly, the shift of the canopy to the north would in turn create smaller radii for the curbs of the access drive connecting to Veterans Drive.

**8. SECTION 119-53.C(2): VERTICAL CURB DIMENSIONS**

***Requirement:***

*Vertical curbs shall be constructed in accordance with the specifications located in Appendix 16 and the most current editions of PennDOT Publication form 408, Specifications, and PennDOT Publication No. 72, Standards for Roadway Construction, and in accordance with any regulations adopted by the state or federal government concerning handicapped accessibility. Appendix 16 requires vertical curbing to be eight (8) inches wide and eight (8) inches tall in its reveal.*

***Proposed Relief:***

**We are proposing a vertical curb with 6" height in its reveal.**

***Justification:***

The six-inch height for the proposed curbing is a Sheetz Standard for site construction as the curb height is imperative to prevent vehicular damage caused by taller curb heights within the parking lot. The curb will still have the ultimate 18" height as specified by the ordinance. Lastly, the curbing is not being proposed for any new public streets and will be privately maintained.

## **Stormwater Management Ordinance**

### **1. SECTION 113-32.A(1)(C) – LOADING RATIOS**

***Requirement:***

*The maximum loading ratio for volume control facilities in Karst areas shall be 3:1 impervious drainage area to infiltration area and 5:1 total drainage area to infiltration area. The maximum loading ratio for volume control facilities in non-Karst areas shall be 5:1 impervious drainage area to infiltration area and 8:1 total drainage area to infiltration area. A higher ratio may be approved by the Township if justification is provided. Hydraulic depth may be used as an alternative to an area-based loading ratio if the design hydraulic depth is shown to be less than the depth that could result from the maximum area loading ratio.*

***Proposed Relief:***

**We are requesting a modification/waiver of the requirement to allow loading ratios greater than required.**

***Justification:***

The project site is an existing commercial development and is not underlain by karst geology. Due to the proposed use of commercial with fueling stations, infiltration related stormwater management facilities were located in the area farthest from those fuel areas which provided for a limited footprint available.

Additionally, the facility is designed in an “offline” configuration with a diversion structure to limit the amount of flow to the underground stormwater BMP. While the total drainage area to the diversion structure may be greater than the 5:1\8:1 loading ratio, the tributary volume\rate of stormwater is reduced to 3.0 cfs and not the total 2 year storm peak rate. We believe this meets the intent of the ordinance section to limit potential overloading of the facility.

A site-specific geotechnical evaluation of the site established adequate infiltration rates, and no specific concerns related to overloading or susceptibility to long term failure of infiltration practices. Furthermore, the current PA DEP standard evaluation, instructions, and worksheets have removed all references to loading ratios. The design is consistent with all current PA DEP standards.

### **2. SECTION 113-37.C – CONVEYANCE PIPE DIAMETER**

***Requirement:***

*Within the Conveyance Facility Design Criteria there are pipe design requirements for the minimum pipe diameter to be 8 inches within non-vehicular loading and 15 inches within vehicular loading that is outside of the public street right-of-way.*

***Proposed Relief:***

**We are requesting a modification of this section due to the proposed roof drain pipes being 6” in diameter and being located within grass cover as well as certain sections that connect into the main conveyance system being underneath pavement with vehicular loading. Also, the modification includes the 12” diameter pipe associated with the diversion manhole.**

***Justification:***

Due to the building and fuel canopy roof surface runoff that must be captured roof drains must be installed and connected to the main stem of the conveyance system. Based on the specifications regarding the 6” N-12 WT IB Pipe detailed by ADS, Inc. the structural strength is sufficient to support the loads demonstrated in vehicular loading. The referenced ADS specifications are included within this submission package. In addition, roof drain capacity calculations have been provided in the PCSM report on Page 160-161 to demonstrate that the pipes have capacity to convey the flow to the main stem of the conveyance system. The 12” diameter pipe associated with the diversion manhole is sized based on the diversion calculation shown on Page 134 of the PCSM Report. Along with the abovementioned justifications, the entirety of the conveyance system is privately owned and maintained.

**3. SECTION 113-42.D: PLAN SCALE**

***Requirement:***

*Drawings or maps of the project area shall be drawn at one inch equals 50 feet or larger scale (i.e., one inch equals 40 feet, one inch equals 30 feet, etc.), and shall be submitted on twenty-four-inch-by-thirty-six-inch sheets.*

***Proposed Relief:***

**To provide a plan scale of 1” = 80’ and 1” = 200’ on drainage area maps and offsite discharge map.**

***Justification:***

The purpose of the drainage area maps and offsite discharge map is to provide context and orientation for the drainage areas pertaining to the project site, and show the offsite flowpath of the discharge from the site. To provide sheets per the ordinance requirement would not capture the overall drainage areas on a single sheet making it cumbersome to understand the information.

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We request that these modifications be discussed at the next available Mount Joy Township Planning Commission meeting.

Thank you for your assistance with this review process.  
Sincerely,

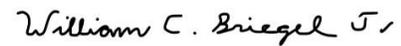
**RGS ASSOCIATES, INC.**



Chris Venarchick, RLA  
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Billy Briegel  
Site Designer