

April 23, 2025

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

Via email: kkaufman@mtjoytwp.org



**LANCASTER CIVIL**  
★ ★ *engineering company* ★ ★  
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Re: Sheetz – Elizabethtown, PA (Veterans Drive)  
Preliminary/Final Land Development Plan  
Township Permit No. 24-22-FLDP  
LCEC Project No: 25-169

Dear Mr. Kaufman,

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

- Response letter dated April 11, 2025
- Modification request letter dated April 11, 2025
- Preliminary/Final Land Development Plan revised April 11, 2025
- Erosion and Sediment Control Plan revised April 11, 2025
- Stormwater Management Report revised April 11, 2025
- Loading Area Turning Movement Plan dated April 2, 2025
- DEP No Planning Needed letter dated February 6, 2025
- Emergency service correspondence
- Opinion of Probable Cost dated April 11, 2025
- Supplemental Traffic Analysis revised April 2, 2025

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 November 6, 2024, the Board granted the following:
  - a. Special Exception per Section 135-143.D to allow a vehicular fueling station in the MU District
  - b. Variance from Section 135-383.B(7) to extend the approval of the special exception for an additional year

**Subdivision and Land Development Ordinance**

2. The plan should be submitted as a preliminary land development plan (119-25.C(2)). The applicant has requested a waiver 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, therefore I have no objection to this modification.

3. The plans shall be signed and sealed by a registered engineer, surveyor or landscape architect (119-31.A(5)).
4. The traffic engineering comments provided by Traffic Planning and Design dated April 18, 2025 regarding the traffic study shall be addressed (119-32.C and 119-34.E(3)(d)).
5. All certificates shall be executed prior to final plan approval (119-35.E).
6. Legal descriptions for easements to be dedicated to the Township, including but not limited to, drainage easements, shall be provided (119-35.E(4)(a)).
7. 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).
8. A land development agreement in a form acceptable to the Township Solicitor shall be executed (119-35.E(4)(f)).
9. Financial security shall be provided prior to final plan approval. The Opinion of Probable Costs shall be updated to reflect the revised stormwater design, including the addition of the trench drain, trench drain pipe, 24" SLCPP, etc. and updated quantities for the manholes, 12" SLCPP, etc. (119-41 & 113-60). The water quality filters should be included as well. The total costs of subsurface infiltration bed (i.e. BMP-001) shall be confirmed (it appears the cost of BMP 001 are significantly lower than typical costs for StormTech underground structures).
10. The frontage along Old Hershey Road (a local street), Veterans Drive (a collector street), and Hershey Road/S.R. 0743 (an arterial street) shall be improved in accordance with 119-52.J or as indicated on the Township Official Map, whichever is greater. Concrete curbing and sidewalk shall be constructed (119-52.J(3)(a) & 119-53.B(2) / 119-53.C). The applicant has requested a deferral of providing vertical curbing and sidewalk along Veterans Drive, Old Hershey Road, and Hershey Road.

Deferral response: There is existing sidewalk along Old Hershey Road across the right-of-way from the subject tract; however, there is no existing sidewalk along Veterans Drive, Old Hershey Road, and Hershey Road (S.R. 0743) on adjoining properties. The subject tract proposes a sidewalk with curb ramp along the access drive intersecting Old Hershey Road, and a crosswalk is proposed on Old Hershey Road to connect to the sidewalk fronting on the 186 Old Hershey Road tract. The designer describes safety and environmental concerns (i.e. wetlands on NE portion of site) for not providing sidewalk on the subject tract along Veterans Drive, Hershey Road, and Old Hershey Road. There is no existing vertical curbing along the frontages of the adjoining properties of Veterans Drive, Old Hershey Road, and Hershey Road. Based on these considerations I have no objections to a deferral of these requirements with the condition that a deferral agreement be executed in a form acceptable to the Township Solicitor.

11. 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)).

12. 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)).

13. The cartway edge at the intersection of the proposed access drive and Veterans Drive (a collector street) shall be rounded with a radius of 35' (119-52.K(4)). The applicant has requested a waiver of this requirement.

Waiver response: The proposed access drive curb radii of 14.5 feet is similar to the existing access drive curb radii of 15 feet. The engineer has also provided truck turning movements indicating that the proposed radii are adequate for the proposed use. Based on these considerations, I have no objections to a waiver of this requirement.

14. Access drives shall be separated by 200 feet from access drive and street intersections (119-52.S(3)(d)). The applicant has requested a waiver of this requirement

Waiver response: The two proposed access drives do not meet the 200 feet separation distance requirement. The proposed access drive intersecting Old Hershey Road has a 158 feet separation from Veterans Drive. The proposed access drive intersecting Veterans Drive has a separation distance of 108 feet to the access drive serving the "Mt. Calvary Church of Elizabethtown" property; however, a 200 feet separation distance to the Hershey Road and Old Hershey Road intersections is provided. It is not possible to provide a 200 feet separation distance for the proposed access drives and the separation distance is further limited by existing wetlands and the existing lot width. The new access drives are proposed to be at the same location as the existing access drives. Based on these considerations, I have no objections to a waiver of this requirement.

15. Sidewalks shall be provided along both sides of the proposed access drives (119-53.B(1)). The applicant has requested a waiver of this requirement.

Waiver response: The subject tract proposes a sidewalk with curb ramp along the southern side of the access drive intersecting Old Hershey Road; however, no sidewalk is proposed along the northern side of this access drive or along the access drive intersecting Veterans Drive. There are no existing or proposed sidewalks along Veterans Drive that would connect to sidewalks along that access drive. Moreover, a sidewalk along the northern side of the Old Hershey Road access drive would direct pedestrians into an area of heavy vehicle traffic. Based on these considerations I have no objections to a waiver or deferral of this requirement if the sidewalks along the street frontage are also waived or deferred.

16. Sidewalks shall be a minimum of five feet wide per Appendix No. 16 (119-53.B(4)(a)). The applicant has requested a waiver of this requirement.

Waiver response: The plan currently proposes a sidewalk width of four (4) feet along the access drive onto Old Hershey Road. The waiver request indicates that the sidewalk width along the access drive cannot be increased without reducing the required 25' aisle width; however, that requirement is related to aisle widths between 90-degree parking spaces and is not applicable to the access drive. It appears that there is sufficient room to increase the sidewalk width by one foot and also maintain the required width of twenty feet for the access drive. Based on these considerations, I am unable to support a waiver of this requirement.

17. 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 (119-53.B(10)). The applicant has requested a waiver of this requirement.

Waiver response: There are numerous site constraints due to the proposed access drive width, required landscaping strip, existing lot width, and Sheetz design standards that

make installing the four (4) foot grass strip challenging. Based on these considerations, I have no objections to a waiver of this requirement provided that the sidewalk width is increased to five (5) feet.

18. An 8" reveal is required for the vertical curbing (119-53.C(2)(a)). The applicant has requested a waiver of this requirement.

Waiver response: A six inch reveal is proposed for the curbing within the development. The designer indicates a six inch reveal within the parking lot will prevent vehicular damage versus an eight inch reveal. The majority of the curbing will be privately owned and maintained, and the designer has provided an eight inch reveal along the proposed access drive sidewalk. Based on these considerations, I have no objections to a waiver of this requirement.

19. 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**

20. 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).

21. 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 17:1 and an impervious loading ratio of 11.7:1 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 Bed is not in a Karst area and has been designed to capture a depth of 1.16 feet with a dewatering time of 52.83 hours, which will mitigate each of the risk factors described above. Given these considerations, I have no objection to the higher ratios.

22. The minimum diameter for a pipe that experiences vehicular loading is 15 inches (113-37.C(1)(a)[4]). The applicant has requested a waiver of this requirement.

Waiver response: The designer is proposing 6" roof leaders, a 6" pipe from the trench drain, and 12" pipes from the diversion manholes in areas that experience vehicular loading. The proposed cover for all conveyance pipes meets the manufacturer's specifications. All pipes have been designed to accommodate one-hundred year storm flows. In addition, the pipes will be privately owned and maintained. Based upon these considerations, I have no objections to a waiver of this requirement.

23. Inlets or manholes shall be placed at all points of changes in the horizontal or vertical directions of conveyances pipes (113-37.C(3)(b)). The connection of the 6" pipe from the trench drain to the pipe from I-A15 to MH-A4 does not meet this requirement.

24. The landowner shall execute the final documents prior to final plan approval (113-41.B).

25. Plan sheets shall be shown at a scale 50 feet to the inch or larger (113-42.D). The applicant has requested a waiver of this requirement for the pre- and post- development drainage area maps.

Waiver response: The drainage area plan sheets are intended to show the entire drainage areas, including the study points and offsite drainage. The majority of the plan sheets,

including existing conditions, layout, grading, easements, etc., are drawn at a scale that is adequate to properly show the required features and improvements. Based on these considerations, I have no objections to a waiver of this requirement.

26. The slope of the diversion outflow pipe (10%) shown in the Typical Diversion Structure detail is inconsistent with the slope of the conveyance pipe (3.56%) in the MH-A12 to MH-A13 vertical profile (119-43.J(5)). The slope shown in the detail is also inconsistent with the slope of the pipe (4.56%) in the MH-A4 to MH-A5 profile
27. Since a PennDOT Highway Occupancy Permit is required for the proposed pavement widening and stormwater discharge onto the State road, 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).
28. An operation and maintenance (O&M) agreement shall be provided and recorded with the final plan (113-62).

### **Traffic**

29. 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 Traffic Impact Study revised November 2024, the calculation of this fee would be as follows:

$$84 \text{ new P.M. peak hour trips} \times \$1,766 / \text{new P.M. peak hour trip} = \$148,344$$

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

Sincerely,



Benjamin S. Craddock, PE, President

**LANCASTER CIVIL**

cc: Jackie Wilbern, Township Zoning Officer (via email)  
Justin Evans, Assistant Zoning Officer (via email)  
Patricia Bailey, Township Secretary (via email)  
Josele Cleary, Esquire, Township Solicitor (via email)  
Renee Addleman, Planner, LCPC (via email)  
Christopher Lincoln, PE, Traffic Planning & Design (via email)  
Austin Calaman, EAWA (via email)  
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