

May 16, 2025

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

Via email: kkaufman@mtjoytwp.org

Re: Robert Brubaker  
Minor Land Development Plan  
Township Permit No. 24-21-MLDP  
LCEC Project No: 25-182



**LANCASTER CIVIL**  
★ ★ engineering company ★ ★  
*p.o. box 8972, lancaster, pa 17604-8972*  
*www.lancastercivil.com*

Dear Mr. Kaufman,

We have received a minor land development plan submission from Nye Consulting Services Inc. for the above-referenced project. The submission consisted of the following documents:

- Comment response letter dated April 23, 2025
- Minor Land Development Plan revised January 8, 2025
- Stormwater Management Report dated October 7, 2024
- Erosion and Sedimentation Control Plan revised January 8, 2025
- Erosion and Sedimentation Control Report dated October 7, 2024
- Waiver request letter dated April 23, 2025
- Cost Opinion dated January 8, 2025
- Wetland Investigation dated December 30, 2024
- PNDI Final Receipt dated December 23, 2024
- PCSM Spreadsheets dated December 23, 2024
- Stormwater Management Agreement and Declaration of Easement undated

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

**Zoning Ordinance**

1. The landowner shall provide written evidence from the Conservation District/PADEP of an approved, pending, or nonapplicable conservation and nutrient management plan, as well as confirmation from the relevant authority whether the proposed activity is regulated as a concentrated animal feeding operation (135-212.D).
2. The Recorder of Deeds information (i.e. instrument number) for the “Existing Cross Access Easements” shall be shown on the plans (135-321.C).

**Subdivision and Land Development Ordinance**

3. The plans shall be signed and sealed by a registered engineer, surveyor or landscape architect (119-31.A(5)).

4. The size of the existing stormwater management facilities within Camp Road shall be added to the plan (119-31.C(3)(d)).
5. The Recorder of Deeds information (i.e. instrument number) for the existing drainage easement shown on the subdivision plan recorded in Book J-214, page 106 for Joseph B. and Barbara K. Zook and Elam B. and Sarah F. Zook (alternatively, the aforementioned plan could be listed on the plans) (119-31.C(4)(b)).
6. A water and sewer feasibility report shall be provided, even if no connections to public water or sewer are proposed (119-32.A & 119-35.E(3)(b)).
7. A wetlands study shall be provided (119-32.B & 119-34.E(3)(c)). The study shall be completed for the entire subject tract.
8. All certificates shall be executed prior to final plan approval (119-35.E).
9. 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).
10. 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)).
11. Legal descriptions for easements to be dedicated to the Township shall be provided (119-35.E(4)(a)).
12. 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).
13. A land development agreement in a form acceptable to the Township Solicitor shall be executed (119-35.E(4)(f)).
14. Financial security shall be provided (119-41 & 113-60). The construction cost estimate shall include costs for the topsoil stockpiles, bulk earthwork/grading, finish grading, orange construction fence, trash rack, and rock splash pad. The quantities for the North American Green S150 Liner shall be corrected.
15. The frontage along Camp Road shall be improved in accordance with 119-52.J or as indicated on the Township Official Map, whichever is greater. The required cartway width for a local street outside of the urban growth area is 24 feet (119-52.J(3)(a) & 119-53.B(2) / 119-53.C). The applicant has requested a waiver of this requirement.  
Waiver response: The applicant has requested a waiver to widen the existing cartway. The existing cartway width is 24 feet and Camp Road is not included in the Township's current road improvements plan. The applicant indicates that there is an average of one truck per day and that the proposed improvements will not greatly impact truck traffic patterns. The applicant also indicates the existing driveway is designed to handle truck movements without an adverse impact on the roadway. Based on these considerations, I have no objections to a deferral of this requirement with the condition a deferral agreement be executed in a form acceptable to the Township Solicitor.
16. 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)).

17. The applicant shall be responsible for completing a declaration of easement and stormwater management agreement in a form that is acceptable to the Township Solicitor (119-56.E).
18. 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**

19. The test location names shown in the Soil Field Sheets and in the Data Collection Chart for 6 & 12 Inch Infiltration Rings worksheets in the Stormwater Management Report are inconsistent with the infiltration test and probe names shown on the plans (113-31.L).
20. The Ordinance requires the loading ratio for the total drainage area to infiltration area to be less than 8:1 (113-32.A.(2)(c)). A total loading ratio of 9:1 is proposed. Per Ordinance 312-2017 the Township Engineer can approve higher loading ratios (no modification is necessary).

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 impervious drainage area to infiltration area loading ratio meets the ordinance requirements and the total loading ratio is just over the recommended ratio. In addition, the proposed Infiltration Basin 1 is not in a Karst area and has been designed to capture a depth of 0.86 feet for the 2 year storm with a dewatering time of 24 hours, which will mitigate each of the risk factors described above. Given these considerations, I have no objection to the higher ratios.

21. Design calculations shall be provided for Swale 3 (113-34.G(1) & 113-37.C.(1) & (5)).
22. The post-development Post-DA to Basin DP-001 drainage area boundaries should be revised to reflect the existing and proposed contours (113-35.B).
23. The location/extents of the key trench/clay core shall be shown on the plans (113-37.A.(3)(a)[2][a]).
24. The landowner shall execute the final documents prior to final plan approval (113-41.B).
25. 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](mailto:bencraddock@lancastercivil.com) or via telephone at 717-799-8599.

Sincerely,



Benjamin S. Craddock, PE, President

**LANCASTER CIVIL**

cc: Joseph Price, Community Development Director/Zoning Officer (via email)  
Patricia Bailey, Township Secretary (via email)  
Josele Cleary, Esquire, Township Solicitor (via email)  
Bert Nye, Nye Consulting Services, Inc. (via email)  
Robert Ruth, Nye Consulting Services, Inc. (via email)  
Renee Addleman, Planner, LCPC (via email)