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April 25, 2025

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

**RE: 1376 Campus Road (Klein Mills)
 Modification Request – Phases 1-4 Final Plans
 Mount Joy Township
 RGS Project No: 2018D62-004**

Dear Mr. Kaufman:

RGS Associates, on behalf of Klein Mills Development, LLC, respectfully requests the following modification associated with all phases (1-4) of the subject subdivision and land development plan:

Subdivision and Land Development Ordinance

1. SECTION 119-52.O(1): STREETLIGHTS

Requirement:

Streetlights shall be installed and spaced accordingly in order to provide the following lighting standards for streets:

Use	Location	Maintained Footcandles ¹	Uniformity Ratio (maximum: minimum) ²
Streets, street intersections and street signs	Residential subdivisions and land developments	0.4	6:1
	Nonresidential subdivisions and land developments	0.9	6:1

NOTES:

- ¹ Illumination levels are maintained horizontal footcandles in a particular location that project onto pavement or other area surface.
- ² Uniformity ratio is a measure of the dispersion of light on an area. The ratio is measured as maximum light level to minimum light level. Example: 6:1 for the given area, the maximum level of illumination shall be less than six times the minimum level of illumination (0.4 x 6 = 2.4).

Proposed Relief:

To provide streetlighting supplied by PPL as the local vendor of streetlighting in the Township for residential subdivisions modified from above-referenced Section to permit a small percentage of areas to be 0.3 FC vs. 0.4 FC minimum and uniformity ratio of 11:1 vs. 6:1 are necessary.

Justification:

PPL is the supplier of streetlighting for most residential subdivisions in Lancaster County including within Mount Joy Township. As such, PPL is providing the fixtures and poles for the street lighting to be located within the right-of-way for the streets to be offered for dedication to the Township. Due to the limited type of fixture and pole supplied by PPL, the exact lighting specification of 0.4 footcandles and 6:1 uniformity ratio per the ordinance cannot be achieved without an excessive quantity of poles and a higher mounting height. Of which, a higher pole is not available by PPL.

In the alternative, the proposed lighting design by PPL will be near general compliance with the ordinance specification using a pole that is compliant at no more than 15' in height, 14' mounting height to be exact. This will result in a reasonably illuminated street without the long-term maintenance burden of nearly double the quantity of streetlights if designed and installed in strict conformance to the ordinance. It is for these reasons that we believe the alternate streetlighting design adequately meets the intent of the ordinance for streetlights.

We request that this modification be discussed initially at the April 28, 2025 Mount Joy Township Planning Commission meeting, with action considered at the May PC meeting.

Thank you for your assistance with this review process.

Sincerely,

RGS ASSOCIATES, INC.



Chris Venarchick, RLA, ASLA
Principal

Copy: Ben Craddock, PE, Lancaster Civil
Andy Miller, Klein Mills Development, LLC

Enclosure: Lighting Plan by Current, dated 3/6/25