



June 28, 2022

Township Board of Supervisors and Planning Commission Members
Smithfield Township
1155 Red Fox Road
East Stroudsburg, PA 18301

**RE: New 131,250 sf Light Manufacturing Facility for Black Buffalo Printing
Land Development Plan Waiver Request Letter
Smithfield Township, Monroe County, PA**

Dear Supervisors and PC Members:

T&M Associates (T&M), on behalf of the Applicant, requests the following waivers for consideration and approval:

1. *In accordance with Section 1301.6.C.(5), "the top of the outlet box shall be set at the one hundred (100) year water surface elevation and shall have an open grate".*

The applicant seeks a waiver from this requirement. The grate elevation of the outlet structure at Infiltration/Detention Basin 002 is set below the 100yr storm since the top of grate is part of the outlet structure design. It was previously approved in this manner as part of the roadway improvement plans for Airstrip Road and request the grate be allowed at the proposed elevation.

2. *In accordance with Section 221.11, "roof drains shall not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/ percolation of storm water where advantageous to do so. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment.*

The applicant seeks a waiver from this requirement. The proposed roof drains are tied into the proposed storm sewer so that the runoff can be directed to the infiltration basin. The water will have an opportunity to percolate and infiltrate in the infiltration basin.

3. *In accordance with Section 223.1.1.(d)(l)(a), permitted activities/development within the 50-foot inner wetland buffer area: "stormwater conveyance required by the Township, buffer maintenance and restoration, the correction of hazardous conditions, stream crossings permitted by DEP and passive unpaved stable trails shall be permitted. No other earth disturbance, grading, filling, buildings, structures, new construction, or development shall be permitted.*

The applicant seeks a waiver from this requirement. The discharge pipe from Infiltration/Detention Basin 001 and scour hole and storm sewer are proposed within the inner wetland buffer, which appear to be permitted. Grading associated with the retaining wall and the retaining wall itself are not proposed in the buffer, however there may be some limited disturbance during construction to construct the wall. The only other encroachment is the previously approved roadway improvements to Airstrip Road as the buffer extends across the existing road. The areas noted are either developed today (Airstrip Road) or existing maintained lawn areas. The encroachments are not within naturalized wooded, quality buffers of the site.



4. *In accordance with Section 223.1.1.(d)(2)(a), permitted activities/development within the 100-foot outer wetland buffer area: "storm water conveyance required by the Township, buffer maintenance and restoration, the correction of hazardous conditions, stream crossings permitted by DEP, roads constructed to existing grade, unpaved trails, and limited forestry activities that do not clear cut the buffer (e.g., selective regeneration harvest) in accord with a forestry management plan shall be permitted provided no buildings are involved, and those activities permitted under §§223(1)(5) and 223(1)(6)".*

Applicant seeks a waiver from this requirement. The project does have limited areas where site improvements and grading will encroach into this outer buffer. Infiltration/Detention Basins 001 and 002 are proposed within the outer buffer as well as retaining walls, driveways, and a portion of the building. Majority of the area of encroachment is lawn area and existing developed areas associated with the airport, not heavily wooded, quality buffer.

5. *In accordance with Section 226.2, "all calculations consistent with this Part using the soil cover complex method shall use the appropriate design rainfall depths for the various return period storms according to the region in which they are located as presented in Table B-1 in Appendix B. If a hydrologic computer model such as PSRM or HEC-1 is used for storm water runoff calculations, then the duration of rainfall shall be twenty-four (24) hours. The SCS "S" curve shown in Figure B-1 of Appendix B shall be used for the rainfall distribution."*

Applicant seeks a waiver from this requirement. Rainfall data from NOAA was utilized in the calculations. The Township Engineer indicated support of this waiver in the LVL review letter.

Very truly yours,

Mark J Buchvalt, PE

Operations Manager