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SUBJECT: VIGON INTERNATIONAL, INC.

PRELIMINARY LAND DEVELOPMENT PLAN REVIEW NO. 2
SMITHFIELD TOWNSHIP, MONROE COUNTY, PENNSYLVANIA

PROJECT NO. 1932195R

Dear Planning Commission Members:

Pursuant to the Township's request, we have completed our second review of the Land Development Plan Application for Vigon International, Inc. The submitted information consists of the following items.

- Cover letter prepared by T&M Associates, dated August 23, 2019.
- Response letter prepared by T&M Associates, dated August 23, 2019.
- Waiver Request Letter prepared by T&M Associates, dated August 23, 2019.
- Electronic submission on CD.
- Preliminary Jurisdictional Determination prepared by the U.S. Army Corps of Engineers dated August 2, 2019.
- Response letter to Monroe County Conservation District Incompleteness Review, prepared by T&M Associates, dated July 12, 2019.
- Property Owner notification letter and list of property owners.
- Building elevation and floor plan.
- Transportation Impact Study Supplement prepared by McMahon Associates, Inc., dated August 23, 2019.
- Stormwater Management Calculations prepared by T&M Associates, dated May 24, 2019, revised July 12, 2019.
- Stormwater Management Calculations Addendum prepared by T&M Associates, dated August 23, 2019.
- Post Construction Stormwater Management Narrative prepared by T&M Associates, dated May 31, 2019, revised July 12, 2019.
- Erosion & Sedimentation Control Narrative prepared by T&M Associates, dated May 31, 2019, revised July 12, 2019.
- Exhibit, Truck Turning Movement Diagrams (5 sheets) prepared by T&M Associates, dated August 23, 2019.
- Preliminary/Final Land Development Plan (22 sheets) prepared by T&M Associates, dated May 29, 2019, revised August 23, 2019.

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BACKGROUND INFORMATION

The Applicant, Vigon International, Inc., is proposing a land development located on the southern side of Airstrip Road, a private road, approximately 2,000 feet west of its intersection with Airport Road (PIN No. 16-7312-00-46 and Tax Parcel No. 16/7/1/9). The development area is located within the M-1, Industrial Zoning District and abuts the B-1, Planned Boulevard Zoning District to the south.

The proposed development will occur on two (2) existing properties; Existing Lot A and Existing Lot B. Existing Lot A has a gross area of 39.88 acres and consists of wetland and steep slope areas, woodland and meadow. Existing Lot B has a gross area of 0.46 acres and consists of an existing dwelling taking access from Airstrip Road. Existing Lots A and B are proposed to be consolidated into one (1) lot having a gross area of 40.34 acres.

The proposed land development will include a 260,050 square foot building constructed in two (2) phases and that will consist of a warehouse and light manufacturing, and office space. A 100-space parking lot, taking access from Airstrip Road, and a stormwater management basin are also proposed. The project will be served with public sewer and water services.

The submission represents two (2) applications and each will be reviewed separately.

- 1. A lot consolidation of Existing Lots A and B. A review will be provided under separate cover.
- 2. A land development.

Based on our review of the above information, we offer the following comments and/or recommendations for your consideration.

ZONING ORDINANCE COMMENTS

- 1. In accordance with Part 3 of the Zoning Ordinance, Schedule of District Regulations, the proposed warehouse and light manufacturing use are permitted by Conditional Use. A Conditional Use Application must be submitted for review. (Previous Comment) A Conditional Use Application has been submitted.
- 2. In accordance with Part 3, Schedule of District Regulations, the maximum permitted building height is 35-feet within the M-1 Zoning District. The Zoning Data on Sheet 7 specifies a proposed building height of 50-feet ±. The proposed building is also located within the Transitional Surface Zone of the Stroudsburg Pocono Airpark and a maximum building height of approximately 100-feet is permitted.

A variance will be required to permit the proposed height of 50-feet \pm within the M-1 Zoning District. (Previous Comment) A Zoning Hearing Board Application has been submitted.

- 3. Comment satisfied.
- 4. In accordance with Section 402, Schedule II, one (1) parking space shall be provided for every 3 employees plus one (1) parking space for each 1,000 gross square feet, but not less than 25% of the total floor area plus one (1) parking space per 3 employees. The plan proposes 100 parking spaces; however, 294 parking spaces are required for the 100 employees and 260,050 square foot proposed building. Under the Sketch Plan review, we advised that 100 parking

spaces did not meet Ordinance requirements. Two avenues to resolve this was available to the Applicant; one, seek a different interpretation from the Zoning Officer, or two, seek a variance from the Zoning Hearing Board. (Previous Comment) The Applicant has requested an interpretation by the Zoning Officer.

5. Comment satisfied.

6. In accordance with Section 404.2.A.(1), "a traffic impact study shall be required for all subdivisions and land developments that, at build-out, are projected to generate fifty (50) or more trip-ends per project peak hour or five hundred (500) trip-ends per day based on the latest edition of Trip Generation published by the Institute of Transportation Engineers. This shall include project additions, changes of use and replacement of nonconforming uses that increase the total traffic (existing plus new traffic) to more than five hundred (500) trip ends per day."

A Transportation Impact Study (TIS) has been submitted and indicates that the proposed development at full build-out will generate 863 new trips during a typical weekday with 135 new trips during the weekday morning peak hour and 145 new trips during the weekday afternoon peak hour.

The following are descriptions of the impacts of the analyzed intersections; Airport Road and Airstrip Road, and Airport Road and Milford Road (S.R. 2012).

		Weel	kday Morning F	Peak Hour	Weekday Afternoon Peak Hour			
		2010	2022 Bı	uild-Out	2019 Existing	2022 Build-Out		
		2019 Existing	without development	with development		without development	with development	
Airstrip	EB	A	A	A	A	Α	Α	
Road		8.4	8.4	8.5	8.4	8.5	9.0	
	NB	A	A	A	Α	A	A	
Airport		2.1	2.2	6.8	1.4	1.4	4.3	
Road	SB	(1)	(1)	(1)	(1)	(1)	(1)	
	Ī	A	A	A	Α	A	A	
Overall		1.3	1.3	5.4	1.9	1.9	5.8	

⁽¹⁾ Movement operates at free-flow conditions

The Levels of Service at Airstrip Road and Airport Road will remain at A during the 2019 Existing condition and the 2022 Build-Out with Development condition with increases in delay. The increases in delay are less than 10 seconds which does not require modification to the intersection. No improvements are proposed.

		Weel	kday Morning F	Peak Hour	Weekday Afternoon Peak Hour			
		2010	2022 Bu	2022 Build-Out		2022 Build-Out		
		2019 Existing	without development	with development	2019 Existing	without development	with development	
Milford	CD	Α	Α	Α	Α	A	Α	
Road	EB	1.3	1.3	2.6	1.3	1.3	2.7	
	WB	(1)	(1)	(1)	(1)	(1)	(1)	
Airport	an.	В	В	С	В	С	D	
Road SB	28	11.7	12.2	15.3	14.3	15.2	28.9	
Overall		A	A	A	Α	A	A	
Overan		1.4	1.4	2.6	1.7	1.8	5.3	

⁽¹⁾ Movement operates at free-flow conditions

The Overall Level of Service remains at A with increases in delay during all peak hours. However, the analysis of Airport Road southbound shows a decrease in the Level of Service from B to C between the 2019 Existing condition and 2022 Build-Out with Development condition, and a decrease in Level of Service from B to C to D during the 2019 existing conditions, 2022 Build-Out without Development condition and 2022 Build-Out with Development condition, respectively. No improvements are proposed.

(Previous Comment)

A Transportation Impact Study (TIS) Supplement has been submitted demonstrating proposed traffic conditions related to the existing use at the nearby Vigon facility as presented in the Statement of Operations prepared by Vigon and dated August 21, 2019. The Statement of Operations indicates a consolidation of operations is proposed and the following new trips were determined by the Statement.

	Daily	Weekday Morning Peak			Weekday Afternoon Peak			
Land Use			Hour		Hour			
		In	Out	Total	In	Out	Total	
Manufacturing	204	27	10	37	6	18	24	
Warehouse	96	8	3	11	3	8	11	
Total	300	35	13	48	9	26	35	

The levels of service at the intersection of Airport Road and Airstrip Road and at the intersection of Airport Road and Milford Road (S.R. 2012) were updated accordingly.

Airport F	Road a	ınd Airstrip	Road					
		Weel	kday Morning F	Peak Hour	Weekday Afternoon Peak Hour			
		2010	2022 Build-Out		2019	2022 Build-Out		
		2019 Existing	without	with	Existing	without	with	
		Existing	development	development		development	development	
Airstrip	ЕВ	A	Α	Α	Α	Α	Α	
Road		8.4	8.4	8.5	8.4	8.5	8.6	
							•	
A	NB	Α	A	A	Α	Α	Α	
Airport Road		2.1	2.2	5.1	1.4	1.4	2.3	
Road	SB	(1)	(1)	(1)	(1)	(1)	(1)	
		-						
Overall		A	A	A	Α	Α	Α	
Overall		1.3	1.3	3.5	1.9	1.9	3.5	

⁽¹⁾ Movement operates at free-flow conditions

The Levels of Service at Airstrip Road and Airport Road will remain at A between the existing condition and all peak hour conditions with increases in delay less than 10 seconds. Therefore, no mitigation is required, and none proposed.

		Weel	kday Morning I	Peak Hour	Weekday Afternoon Peak Hour			
		2010	2022 Build-Out		2010	2022 Build-Out		
		2019 Existing	without development	with development	2019 Existing	without development	with development	
Milford	EB	Α	A	Α	Α	Α	Α	
Road		1.3	1.3	1.8	1.3	1.3	1.4	
	WB	(1)	(1)	(1)	(1)	(1)	(1)	
Airport	CD	В	В	С	В	С	С	
Road		11.7	12.2	13.1	14.3	15.2	17.1	
Orionali		Α	A	Α	Α	A	Α	
Overall		1.4	1.4	1.8	1.7	1.8	2.4	

⁽¹⁾ Movement operates at free-flow conditions

The Overall Level of Service remains at A between the existing condition and all peak hour conditions. In addition, the Level of Service for the eastbound thru and left turn traffic along Milford Road (S.R. 2012) also remain at A between the existing condition and all peak hour conditions. Increases in delay are less than 10 seconds. This analysis is consistent with the original Transportation Impact Study. Based upon this analysis, no mitigation is required, and none is proposed.

The analysis of Airport Road southbound still shows a decrease in the Level of Service from B to C during the Morning Peak Hour between the 2019 Existing Condition and the 2022 Build-Out Condition with Development. The Level of Service remains at B during the Morning Peak Hour between the 2019 Existing Condition and the 2022 Build-Out Condition

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without Development. In addition, the analysis now shows a decrease in the Level of Service from B to C during the Afternoon Peak Hour between the 2019 Existing Condition, and both the 2022 Build-Out Conditions without Development and with Development. A decrease from B to D was presented in the original TIS. The delay increases by less than 10 seconds, therefore no mitigation is required, and none is proposed.

Per PennDOT requirements for existing unsignalized intersections having a drop in the level of service, a queue analysis was also performed at the intersection of Airport Road and Milford Road (S.R. 2012) to specifically demonstrate the queue length created by traffic making left hand and right hand turns from Airport Road onto Milford Road (S.R. 2012).

The existing queue storage length is more than 500-feet along Airport Road and the analysis determined a queue length of 25-feet is required.

As a result of the above analyses no mitigation is required at either existing intersection.

- a. In accordance with Section 404.2.B.(3)(i), "should the analysis indicate that unsatisfactory levels of serve (levels of service D, E, or F) as described in "Highway Capacity Manual" (Transportation Research Board Special Report 209 – 1985 or latest edition) will occur on study area roadways, a description of proposed improvements to remedy deficiencies shall be included in this Section. Such proposals shall not include committed projects by the Township and State that have been described and analyzed as required above." During the weekday morning peak hour, the Level of Service drops from B to C between the 2019 Existing condition and 2022 Build-Out without Development condition, and the 2022 Build-Out with Development condition of the SB Airport Road movements at the Airport Road and Milford Road (S.R. 2012) intersection. For the same SB Airport Road movement at the Airport Road and Milford Road (S.R. 2012) intersection and during the weekday afternoon peak hour the Level of Service drops from C to D between the 2022 Build-Out without Development condition and 2022 Build-Out with Development condition. Both drops in Level of Service are accompanied by increases in delay exceeding 10 seconds. Therefore, per the Pennsylvania Department of Transportation, mitigation of the Airport Road and Milford Road (S.R. 2012) intersection is required. A mitigation analysis must be submitted for review. (Previous Comment) As discussed above, the Overall Level of Service remains at A at both studied intersections. The Level of Service drops during the Morning and Afternoon Peak Hours along Airport Road at the intersection with Milford Road (S.R. 2012), however the increases in delay are less than 10 seconds. Therefore, no mitigation is required.
- b. Airstrip Road, in its current condition, is not adequate for the capacity of traffic generated as a result of approval of this Land Development Plan. The plan indicates that improvements along Airstrip Road will be made by others. We recommend that approval of improvements to Airstrip Road and security posted to ensure those improvements be made be in place prior to or concurrently with approval of this Land Development Plan. (Previous Comment) The response indicates plans for improvements along Airstrip Road are being prepared by the owner of the airport and will be submitted to the Township for review. The response further acknowledges the need for approval of these improvements or the posting of financial security prior to development of the Vigon project. The posting of financial security is required in addition to approval and cannot be considered as a substitute for approval.

- c. The Applicant shall address the hours of operation of the proposed facility. Should operation occur on the weekends, additional traffic analysis will be required. (Previous Comment) The Statement of Operations indicates the facility will operate 5 days per week, Monday through Friday, 24 hours per day.
- d. The TIS and TIS Supplement indicates Vigon is proposing to consolidate operations into the new facility along Airstrip Road. The Applicant shall address how the existing facility will be impacted and utilized after the construction of the new facility. (New Comment)
- 7. Comment satisfied.
- 8. In accordance with Section 502.7.A, "tree fences or other approved landscaping features, shall be provided for screening purposes along any boundary of a commercial, planned boulevard and/or manufacturing lot which abuts an existing lot used solely for residential purposes. Minimum height and density of the screening features shall be approved by the Board of Supervisors." Dense woodlands exist along existing property lines shared with residential properties to the east and west. (Previous Comment) The Township shall determine if the existing woodlands along property lines shared with residential properties are a sufficient landscape screen or if additional landscaping will be required.
- 9. In accordance with Section 502.7.C.(2), "the screen planting shall be maintained permanently, and any plant material which does not live shall be replaced within six (6) months. A performance bond shall be posted with the Township in an amount equal to the estimated cost of trees and plantings, to be released only after the passage of the third growing season following planting. A plan for the perpetual care of the buffer area shall be provided to the Township." A performance bond and plan of maintenance of the buffer landscaping must be provided. A note referencing the 6-month replacement period shall also be provided on the plan. (Previous Comment) The required note has been added to the plan. A performance bond and plan of maintenance of the buffer landscaping must be provided.
- 10. In accordance with Section 502.7.E, "where applicable, the Township may require that a covenant running with the land shall be recorded delineating the responsibility of the owner of record for maintenance and replacement to the planting." (Previous Comment) The Township shall determine if a covenant running with the land and related to the landscaping will be required.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

11. In accordance with Sections 401, 402.1, 402.2, and 603.G.(26), where a tract is to be developed in phases, a complete preliminary plan for the entire tract shall be submitted initially, and the extent of each section for which a separate final plan is to be submitted shall be shown and a time schedule presented for the submission of the final plan for those sections. Each phase of a development must be designed so that the stormwater management facilities, streets, sewer facilities, water facilities, and other improvements could be developed independently and function properly and safely without other phases (e.g., each phase of the stormwater management facilities must be designed to comply with all stormwater management ordinance regulations). Final approval may be obtained phase by phase. The proposed development is proposed in two (2) phases. Each phase is presented on the Preliminary Plan. Approval of the Preliminary Plan for the entire development must be obtained prior to Final Plan approval, which may be completed for each individual phase. (Previous Comment) Waivers from

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Sections 401, 402.1, 402.2, and 603.G.(26) are being requested to permit a Preliminary/Final Land Development Plan submission. The request indicates all proposed construction is shown on the submitted plan and that all infrastructure will be installed in Phase I leaving only the construction of the building addition and associated amenities (i.e., storm sewer, fire access roads, and lighting) in Phase 2.

- 12. In accordance with Sections 602.C and 702.C, the Land Development Plan must be accompanied by "two (2) electronic copies (one in AutoCAD format, or format acceptable to the Township and Authority, and one in PDF format)." The plan must be provided in PDF and AutoCAD formats. (Previous Comment) PDF files have been provided with this submission. Subsequent submissions shall also include PDF and AutoCAD files.
- 13. In accordance with Section 602.G, "the applicant/developer shall notify all abutting property owners of the proposed development. This notification shall contain a statement as to the size and scope of the proposed project and the date of the first Planning Commission review of the project. Said notice shall be sent to the mailing address of the abutting property owners as shown on the tax rolls of the Township. A list indicating the names and addresses of the people notified as well as a copy of the letter sent, a certification with "return receipt requested" indicating that the letters had been sent shall be submitted to the Township." The required notifications must be sent to the neighboring property owners with proof of notification provided to the Township. (Previous Comment) A notification letter and list of adjacent property owners have been provided with this submission. The response indicates notifications have been sent, however no proof of mailings has been provided as required. The proof of mailings shall be submitted.
- 14. Comment satisfied.
- 15. In accordance with Section 603.A. (11), "a recent title report shall be submitted verifying any restrictions in the deed affecting the subdivision or development of the property, including, but not limited to, any underground, overhead or surface utility easements or rights-of-way. Copies of easements shall be submitted for review." The required title report must be submitted. (Previous Comment) The response indicates a title report will be provided upon receipt.
- 16. In accordance with Section 603.A.(12), "proof of submission to all the agencies, authorities, commissions, persons, etc., required to be distributed by the applicant/developer under the submission guidelines of this Part" must be provided. Proof of submission to and all permits/approvals from the following agencies must be submitted to the Township. (Previous Comment) The following are statuses of outside agency reviews and approvals. Proof of submission to and all permits/approvals from the following agencies must be submitted.
 - a. Monroe County Planning Commission Review dated June 26, 2019 received.
 - b. Monroe County Conservation District/PADEP Letter of Adequacy and NPDES Permit for Stormwater Discharges from Construction Activities. The Monroe County Conservation District found the submission complete under cover letter dated July 30, 2019.
 - c. Water authority Water Capacity to Serve A will serve letter will be provided upon receipt.

- d. Sewer authority/PADEP Sewer Service and Sewage Facilities Planning Module A Sewage Facilities Planning Module Exemption will be submitted.
- e. Fire Company No comments were received by the Fire Company after review of the plan with the Applicant.
- 17. Comment satisfied.
- 18. Comment satisfied.
- 19. Comment satisfied.
- 20. Comment satisfied.
- 21. Comment satisfied.
- 22. In accordance with Section 603.G.(13), for all land developments, "the size and arrangement of buildings and parking areas, along with any length, area, ratio, number or other physical characteristic referred to in the Smithfield Township Zoning Ordinance [Chapter 27], as amended, shall be dimensioned or indicated on the plan. Turning movement diagrams shall be provided to demonstrate that the largest truck or emergency vehicle servicing the development can safely and conveniently navigate the proposed roads, drives, parking, and loading areas." Turning movement diagrams for a fire truck and largest delivery truck must be provided. A copy of the truck turning diagram shall also be provided to the Fire Chief for review. (Previous Comment) The Applicant shall confirm if the truck turning diagram was provided to the Fire Company for review.
- 23. In accordance with Sections 603.G.(17), 603.G.(17)(b), 1302.1.E, and 1302.2.A, a soil and erosion and sediment control plan shall be submitted. The plan shall include all grading and facilities proposed to control soil erosion and sedimentation during construction and proposed detention/retention facilities, in conformance with all applicable Pennsylvania Department of Environmental Protection and United States Soil Conservation Service regulations. satisfactory letter shall be required from the Monroe County Conservation District on the soil erosion and sedimentation control plan. The proposed limit of disturbance is greater than one (1) acre, therefore, a Letter of Adequacy and approved NPDES permit from the Monroe County Conservation District/Pennsylvania Department of Environmental Protection must be provided upon receipt. The following are comments related to our review of the Erosion and Sediment Control Plans (Sheets 11 and 12), Erosion and Sediment Controls Notes and Details (Sheets 13 and 14), and Erosion & Sedimentation Control Narrative. The plans and narrative must be revised accordingly. (Previous Comment) We have no further comments related to the proposed erosion and sedimentation controls. The Monroe County Conservation District found the submission complete under cover letter July 30, 2019. All correspondence with and permit from the Monroe County Conservation District/Pennsylvania Department of Environmental Protection must be provided to the Township.
- 24. In accordance with Section 603.G.(23), "estimates of traffic volumes generated by the project, shall be based upon estimates from the current edition of the Institute of Transportation Trip General Manual. The Township Planning Commission, Engineer and Board of Supervisors shall review the impact study to analyze its adequacy in solving any traffic problems that will occur due to the subdivision or land development. The Board of Supervisors may decide the certain improvements on- or off-site, are mandatory for plan approval and may attach these

conditions to the approval." A TIS has been submitted and reviewed. Refer to Zoning Ordinance Comments 6 and 7. (Previous Comment) A Transportation Impact Study Supplement has been provided with this submission. Refer to Comment 6.

- 25. In accordance with Sections 603.G.(24), 1401.3, and 1405.1, the applicant/developer shall supply to the Township a statement from a registered engineer detailing the demands that the proposed development will have on the existing public sanitary sewer and public water systems within the Township. The applicant/developer shall supply an application for reservation of capacity or an executed capacity reservation agreement from the appropriate authorities having jurisdiction. The Applicant shall submit the required request for reservation for sanitary sewer and water service. In addition, an approved Sewage Facilities Planning Module will be required. (Previous Comment) The response indicates a will serve letter will be provided upon receipt and a Sewage Facilities Planning Module Exemption will be submitted.
- 26. Comment satisfied.
- 27. In accordance with Section 603.H.(3)(b), the plan shall include plan and profiles of the proposed storm and sanitary sewers. Profiles of the proposed storm and sanitary sewers must be provided and must show all utility crossings with separations dimensioned in the profile. (Previous Comment) The following comments are related to our review of the storm sewer profiles now provided on Sheet 19. The plan must be revised accordingly.
 - a. The pipe diameter listed in the Stm 16-15-19 profile at JB-15 invert out is inconsistent with that provided on Sheet 9.
 - b. The pipe diameter between IN-11 and EW-10 is inconsistent between the Stm 10-13 and Stm 10-15 profiles. The Storm Sewer Table on Sheet 9 and the Combined Pipe Node Report should also be revised accordingly.
- 28. In accordance with Sections 1002.13, 1302.3.A, 1302.3.G, and 1302.3.L, lot and/or parcels shall be laid out and graded to provide positive drainage away from buildings and to prevent damage to neighboring lots, tracts, or parcels. Stormwater management shall be provided in accord with Township stormwater regulations. In general, lot slope shall not be flatter than two percent (2%), and proposed spot elevations for swale high points must be shown on the grading plan. The following comments are related to our review of the Grading Plans (Sheets 9 and 10). (Previous Comment) A waiver from Section 1302.3.G is requested to permit slopes of 1%. The request indicates the existing site is flat and opportunity to provide 2% slope across the site is limited without increasing the already significant amount of fill. Based upon existing site conditions we have no objection to this request.
- 29. In accordance with Section 1005, "wherever a central or public water supply system serves a development, provision shall be made for fire hydrants along streets or on the walls of nonresidential structures as approved by the Fire Company servicing the development in accordance with all prescribed State and county standards". Two (2) new fire hydrants are proposed on the project site. The plan must be provided to the Fire Chief for review. (Previous Comment) The response indicates no comments were received after the Fire Chief reviewed the plan with the Applicant.
- 30. Comment satisfied.
- 31. Comment satisfied.

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- 32. Comment satisfied.
- 33. Comment satisfied.
- 34. Comment satisfied.
- 35. Comment satisfied.
- 36. Comment satisfied.
- 37. Comment satisfied.
- 38. Comment satisfied.
- 39. Comment satisfied.
- 40. Comment satisfied.
- 41. In accordance with Section 1202.A, "in conformance with the Pennsylvania Municipalities Planning Code, this Section requires the public dedication of land suitable for park land, noncommercial recreational uses, preserved open space, and the construction of recreational facilities. Upon agreement of the Board of Supervisors, any of the following alternatives may be approved by the Board of Supervisors in lieu of public dedication of land, as specified in this Section:
 - a. Payment of recreation fees.
 - b. Construction of recreation facilities.
 - c. Dedication of recreation land or preserved open space to the Township or its designee.
 - d. A combination of these alternatives.

Open space, recreation facilities, and/or fees in-lieu-of must be provided. (Previous Comment) The response indicates the Applicant is willing to pay a fee in-lieu-of providing recreation land.

- 42. Comment satisfied.
- 43. Comment satisfied.
- 44. Comment satisfied.
- 45. Comment satisfied.
- 46. Comment satisfied.
- 47. Comment satisfied.
- 48. Comment satisfied.
- 49. Comment satisfied.

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50. Comment satisfied.

- 51. In accordance with Section 1301.7.Q.(2), "the minimum diameter of all storm drainage pipe shall be eighteen inches (18") or an equivalent thereto. Where headroom is restricted, equivalent pipe arches may be used in lieu of circular pipe." A 15-inch diameter basin discharge pipe is proposed and must be revised. (Previous Comment) A waiver from Section 1301.7.Q.(2) is requested to permit the use of 15-inch diameter storm sewer. Two (2), 15-inch diameter storm sewer pipes are proposed in three (3) locations where cover is inadequate, and the capacity requires a larger diameter pipe. Based upon existing site conditions we have no objection to this request.
- 52. In accordance with Section 1301.7.Q.(6), the top of storm drainage pipes beneath cartways shall be at least six (6) inches below sub-grade elevation. Cast iron pipe may be placed within three (3) inches of sub-grade elevation. Outside of cartways, all pipes shall have a minimum cover of one (1) foot." Proposed inlet 12 is located within lawn area and requires a minimum cover of 1-foot. Less than 1-foot of cover is proposed, and the plan must be revised. Proposed manholes 18 and 19 are located within the loading dock/heavy duty pavement area and 1.5-feet of cover is required. The proposed cover is 1-foot over both manholes 18 and 19 and the plan must be revised. In addition, the finished grade at the upslope terminus of the storm sewer run 23 to 22 must be provided on Sheet 9 to confirm adequate cover is proposed over the storm sewer.

Storm sewer profiles, as required in Comment 27, must be submitted for review and to confirm the cover over the entire length of the proposed storm sewer pipe. (Previous Comment) A waiver from Section 1301.7.Q.(6) is requested to permit cover less than required. Upon review of the storm sewer profiles provided with this submission, the cover at IN-13 and between JB-17 to JB-19 within the loading dock area do not meet the required cover of 6-inches below the pavement subbase. Based upon existing site conditions we have no objection to this request.

- 53. In accordance with Section 1301.7.S.(2), "when there is a change in pipe size in an inlet, the elevation for the top of the pipes shall be the same or the small pipe shall be higher." The invert elevations of the proposed storm sewers at inlet 22 and manholes 15 and 17 must be revised. (Previous Comment) A waiver from Section 1301.7.S.(2) is requested. The tops of pipe are not consistent when a change in pipe size occurs. The request indicates the tops of pipe were not matched to achieve pipe slopes and inverts that will work with the flat project site. Based upon existing site conditions we have no objection to this request.
- 54. In accordance with Section 1301.7.S.(3), "a minimum drop of two inches (2") shall be provided in the inlet between the lowest inlet pipe invert elevation and the outlet pipe elevation." No drop is provided at inlets 11 and 21, and only 1.2-inches is provided at inlets 12, 31, and 32 and manhole 17. The storm sewer must be revised. (Previous Comment) A waiver from Section 1301.7.S.(3) is requested. The request states that drops less than required are proposed to achieve pipe slopes and inverts that will work with the flat project site. Based upon existing conditions we have no objection to this request provided a 2-inch sump be constructed in all inlet boxes not satisfying this requirement.
- 55. Comment satisfied.
- 56. Comment satisfied.

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- 57. In accordance with Section 1401.3, "if water is to be provided by means other than private wells owned and maintained by the individual owners of lots within the subdivision or development, applicant/developers shall present evidence to the Board of Commissioners that the subdivision is to be supplied by a certified public utility, a bona fide cooperative associates of lot owners or by a municipal corporation, authority or utility." The Applicant must provide a will-serve letter from the Brodhead Creek Regional Authority. (Previous Comment) The response indicates a will serve letter will be provided upon receipt and a waterline extension is being coordinated with the Brodhead Creek Regional Authority.
- 58. In accordance with Section 1405.1, "the applicant/developer shall submit the information required by this Section for review to ensure that the proposed method of sewage collection, treatment and disposal is feasible and is consistent with the Smithfield Township Sewage Facilities Plan prepared under the terms of Act 537 of the Commonwealth of Pennsylvania. The preliminary plan must indicate that each proposed lot, dwelling or building will be serviced by an appropriate sewage system, thereby avoiding the necessity of major revisions of the plan at the final plan stage." Approval of a Sewage Facilities Planning Module must be obtained from the Pennsylvania Department of Environmental Protection and provided to the Township upon receipt. (Previous Comment) The response indicates capacity has been confirmed with the sewer engineer and that a Sewage Facilities Planning Module Exemption will be submitted.

STORMWATER MANAGEMENT ORDINANCE COMMENTS

The existing property is located within the B-1 Stormwater Management District of the Brodhead Creek Watershed. The unnamed tributary of the Sambo Creek is the receiving water and has a Chapter 93 classification of Cold Water Fishery with Migratory Fishes (CWF/MF).

- 59. In accordance with Sections 221.12, 224.A.(2)(d), and 227.2, all stormwater runoff, other than roof top runoff discussed in subsection (11) above, shall be treated for water quality prior to discharge to surface or groundwater. Water quality devices must be provided at inlets 11 or 12, 21, and 31. (Previous Comment) Per the Snout Oil-Water-Debris Separator Installation detail on Sheet 21, the sump depth shall be equal to 2.5 to 3 times the outlet pipe diameter. The proposed bottom of inlet elevations specified at IN-12, IN-21, and CB-31 on Sheet 19 must be revised accordingly.
- 60. In accordance with Section 223.A, for water quality and streambank erosion, the applicant shall design a water quality BMP to detain the proposed conditions two (2) year, twenty-four (24) hour design storm to the existing conditions one (1) year flow using the SCS Type II distribution. (New Comment) As discussed in Comment 65, peak flow reduction is not achieved in the north subarea and stormwater management facilities are required. The facilities shall be designed to reduce the peak flow of the post development 2-year storm event to that of the predevelopment 1-year storm event.
- 61. In accordance with Section 223.I.(1)(d)(1)(a), permitted activities/development in the inner wetland buffer, "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." A portion of the proposed driveway and rock riprap at the basin discharge are proposed within the inner buffer and the plan must be revised. (Previous Comment 60) The wetland boundaries have been revised based upon the Army Corps of Engineers Preliminary Jurisdictional Determination.

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Portions of the proposed access driveway, stormwater management basin, storm sewer crossing Airstrip Road (by others), sanitary sewer, waterline, and rock riprap are now located within the Township inner wetland buffer. A waiver from Township Ordinance Section 223.I.(1)(d)(1)(a) is requested to permit the proposed construction within the Township inner wetland buffer. The request indicates the areas of encroachment are limited and consist of mostly lawn area, and that 16 acres of the existing 40 acre project site is proposed to be disturbed with this land development.

The Waiver Request Letter and list of requests on Sheet 2 now reference Section 223.1.(l)(d)(1)(a) and must be revised to reflect Section 223.1.(l)(d)(1)(a).

62. In accordance with Section 223.I.(1)(d)(2)(a), permitted activities/development in the outer wetland buffer, "stormwater 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.I.(5) and §223.I.(6)." Parking and access drive areas, storm sewer, and the stormwater management basin are located within the outer buffer and the plan must be revised. (Previous Comment 61) The wetland boundaries have been revised based upon the Army Corps of Engineers Preliminary Jurisdictional Determination. Portions of the proposed access driveway, parking area, stormwater management basin, storm sewer, sanitary sewer, waterline, and Phase 2 building are now located within the Township outer wetland buffer. A waiver from Township Ordinance Section 223.I.(1)(d)(2)(a) is requested to permit construction within the Township outer wetland buffer. The request indicates the areas of encroachment are limited and consist of mostly lawn area, and that 16 acres of the existing 40 acre project site is proposed to be disturbed with this land development.

The Waiver Request Letter and list of requests on Sheet 2 now reference Section 223.1.(1)(d)(2)(a) and must be revised to reflect Section 223.1.(1)(d)(2)(a)

- 63. Previous Comment 62 satisfied.
- 64. Previous Comment 63 satisfied.
- 65. In accordance with Table 225.1, in the B-1 Stormwater Management District the post development 2-, 5-, 10-, 25-, 50-, and 100-year storm events must be reduced to the predevelopment 1-, 2-, 5-, 10-, 25-, and 100-year storm events, respectively. (New Comment) The project site is split into two (2) watersheds; the north subarea discharges toward Airstrip Road and the south subarea discharges toward existing woodlands and wetlands. Upon further review of the peak flow calculations, the post development peak flows of the north subarea during the 2-year and 5-year storm events are not reduced below the peak flows of the predevelopment 1-year and 2-year storm events, respectively. The plan must be revised to provide stormwater management facilities to achieve the required peak flow reduction in the north subarea.
- 66. Previous Comment 64 satisfied.
- 67. Previous Comment 65 satisfied.
- 68. Previous Comment 66 satisfied.

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- 69. Section 226.4 states, in part, "times-of-concentration for overland flow shall be calculated using the methodology presented in Chapter 3 of <u>Urban Hydrology for Small Watersheds</u>, NRCS, TR-55 (as amended or replaced from time to time by NRCS). Times-of-concentration for channel and pipe flow shall be computed using Manning's equation." The following comments are related to our review of the submitted time of concentration calculations. The calculations and/or plans must be revised accordingly. (Previous Comment 67)
 - a. Comment satisfied.
 - b. Comment satisfied.
 - c. A minimum time of concentration of 5 minutes shall be utilized in the Post Basin Imp hydrograph. (New Comment)
- 70. Previous Comment 68 satisfied.
- 71. Previous Comment 69 satisfied.
- 72. Previous Comment 70 satisfied.
- 73. In accordance with Sections 227.6, 227.7, and 227.8, any other drainage conveyance facility and/or channel not governed by Chapter 105 must be able to convey at a minimum runoff from the fifty (50) year design storm with a minimum one (1) foot of freeboard measured below the lowest point along the top of the roadway. Refer to Comment 45 for comments related to our review of the storm sewer calculations. The storm sewer calculations must be revised accordingly. (Previous Comment 71) A waiver from Section 227.6 is requested to permit the proposed storm sewer having less than 1-foot of freeboard during the 50-year storm event. The proposed storm sewer is designed with no surcharge during the 50-year storm event as required by Section 227.8. We have no objection to this request.

The Waiver Request Letter and list of requests on Sheet 2 now reference Section 227 and must be revised to reference Section 227.6.

- 74. Previous Comment 72 satisfied.
- 75. In accordance with Sections 228.1, 233.A.(4), and 233.B.(20), earth disturbance must be conducted conformance with Chapter 102. An erosion and sedimentation control plan, including all reviews and letters of adequacy obtained by the Conservation District must be provided. The proposed limit of disturbance is greater than one (1) acre, therefore, a Letter of Adequacy and approved NPDES permit from the Monroe County Conservation District/Pennsylvania Department of Environmental Protection must be provided upon receipt. Refer to Comment 23 for comments related to our review of the Erosion and Sediment Control Plans (Sheets 11 and 12), Erosion and Sediment Controls Notes and Details (Sheets 13 and 14), and Erosion & Sedimentation Control Narrative. (Previous Comment 73) We have no further comments related to the proposed erosion and sedimentation controls. The Monroe County Conservation District found the submission complete under cover letter dated July 30, 2019. All correspondence with and permit from the Monroe County Conservation District/Pennsylvania Department of Environmental Protection must be provided to the Township.
- 76. Previous Comment 74 satisfied.

STORMWATER MANAGEMENT AND STORM SEWER REVIEW COMMENTS

- 77. Previous Comment 75 satisfied.
- 78. Previous Comment 76 satisfied.
- 79. Previous Comment 77 satisfied.

MISCELLANEOUS COMMENTS

- 80. The proposed waterline crosses curblines through the parking lot and is located only 5-feet from proposed trees. Relocating the proposed waterline into the paved area and not crossing the proposed curbline will eliminate the need to remove and replace curb should the waterline ever need repair or replacement and will increase the separation between it and the proposed trees. The plan should be revised accordingly. (Previous Comment 78) The proposed waterline or the tree at the northwestern most corner of the proposed parking lot should be relocated to provide a separation of at least 10-feet.
- 81. Previous Comment 79 satisfied.
- 82. Previous Comment 80 satisfied.
- 83. Previous Comment 81 satisfied.
- 84. Previous Comment 82 satisfied.
- 85. Previous Comment 83 satisfied.
- 86. Previous Comment 84 satisfied.
- 87. Previous Comment 85 satisfied.
- 88. The proposed light poles must be shown on the Landscape Plan, Sheet 17. (Previous Comment 86) Conflicts will occur between the proposed light on the eastern central parking island and the Skyline Honey Locust and between the proposed light opposite the loading dock and the Autumn Flame Maple. The lights or trees shall be relocated accordingly.
- 89. Previous Comment 87 satisfied.
- 90. Previous Comment 88 satisfied.
- 91. Previous Comment 89 satisfied.

PLAN REVISION COMMENTS

- 92. The input data provided in the Combined Pipe/Node Report is inconsistent between the Stormwater Management Calculations and the Stormwater Management Calculations Addendum. The Report must be revised for consistency, or only one (1) set of stormwater management calculations should be provided for clarity. (New Comment)
- 93. On Sheet 9, the slope listed in the Storm Sewer Table for JB-15/JB-16, and the lengths of JB-18/JB-18A and JB18A/JB18B are inconsistent with those shown in the Stm 16-15-19 profile

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on Sheet 19. The table or profile must be revised accordingly. (New Comment)

- 94. On Sheet 18, the type of concrete shall be specified in the Light Base detail. (New Comment)
- 95. On Sheet 19, the invert of the 18-inch HDPE adjacent to SMH2 in the SAN LAT profile is inconsistent with that provided in the Stm 30-33 profile and must be revised. (New Comment)
- 96. On Sheet 21, the Section Through Detention Basin Berm detail references an emergency spillway detail. The referenced detail is not shown on the plan and shall be provided. In addition, the plan and emergency spillway calculations specify a 60-foot wide spillway while the pond report in the Stormwater Management Calculations utilizes a 50-foot wide spillway. The pond report must be revised. (New Comment)
- 97. A Type M Inlet (6' Inlet Top) detail is provided on Sheet 21. The inlet(s) at which the 6-foot inlet top is required shall be specified in the profiles provided on Sheet 19. (New Comment)

The above comments represent a thorough and comprehensive review of the information submitted with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Smithfield Township prior to approval of the Land Development Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions regarding the above comments, please call me.

Sincerely,

Jon S. Tresslar, P.E., P.L.S.

lan S. Irasslay

Township Engineer

JST/mep/cg

cc: Ronold J. Karasek, Esquire, Smithfield Township Solicitor Ken Wolf, Smithfield Township Zoning Officer

Mark J. Buchvalt, P.E., T&M Associates - Applicant's Engineer

Joseph F. Correia, J. G. Petrucci

Stroudsburg Pocono Airpark, LLC – Property Owner

Airstrip Road DC, LLC - Equitable Owner

Vigon International, LLC – Applicant

George E. Hamlen – Property Owner

Melissa E. Prugar, P.E. – Boucher & James, Inc.