



YOUR GOALS. OUR MISSION.

May 5, 2025

Smithfield Township Planning Commission
1155 Red Fox Road
East Stroudsburg, PA 18301

**SUBJECT: 115 TWIN FALLS ROAD PRELIMINARY/FINAL LAND DEVELOPMENT
PLAN REVIEW NO. 1
SMITHFIELD TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
PROJECT NO. SMTW-R0022**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed our first review of the submitted Preliminary/Final Land Development Plan Application. The submitted information consists of the following items.

- Smithfield Township Application for Review of a Subdivision or Land Development Plan.
- Drainage Plan Application.
- Wetland and Waters Evaluation Report prepared by Hanover Engineering, dated June 24, 2024.
- Zoning Hearing Board Decision dated February 13, 2025.
- Property Deed, Deed Book 2648, Page 4841.
- Main Extension Agreement dated February 19, 2010.
- Map of Survey of Lands of Kathleen A. Macauley, Ruth E. Straits, Carol M. Yanovitch, and David H. Lesoine, prepared by Frank J. Smith, Jr., Inc., dated June 18, 2014.
- Stormwater Management Report prepared by Hanover Engineering, dated March 21, 2025.
- Preliminary/Final Land Development Plans (21 sheets) prepared by Hanover Engineering, dated March 14, 2025.

BACKGROUND INFORMATION

The Applicant, Smithfield Sewer Authority, is proposing a land development on its property located at the southwestern corner of the intersection of Seven Bridges Road (S.R. 1019) and Twin Falls Road. The property address is 115 Twin Falls Road.

The existing property has an area of 2.47 acres and is located within the ED, Economic Development Zoning District. The property consists of an existing residential dwelling with two (2) driveways accessing Seven Bridges Road (S.R. 1019) and Twin Falls Road. A garage also exists. Marshalls Creek and its 100 Year Zone AE Floodway traverse the southerly portion of the property. Wetlands are adjacent to Marshalls Creek and steep slopes also exist.

The project proposes to utilize the existing dwelling as the Sewer Authority's office. Additions are



proposed to the existing building and a parking lot is proposed with access from Twin Falls Road only. The existing gravel driveway accessing Seven Bridges Road (S.R. 1019) will be removed within the property and will remain within the Right-of-Way of Seven Bridges Road. Stormwater management and lighting are proposed.

On February 13, 2025, the Smithfield Township Zoning Hearing Board granted the following variances:

1. From Section 27-403.1.M to permit construction of a parking area within the 50-foot front lot line parking setback.
2. From Section 27-502.7.C to reduce the landscaped parking buffer to 10-feet.

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

ZONING ORDINANCE COMMENTS

1. In accordance with Section 309, Schedule of District Regulations, the maximum building coverage is 35%. *The Zoning Requirements on Sheet CS-1 shall be revised to include the maximum permitted and proposed building coverages.*
2. In accordance with 401.3.D.(3), “no development, filling, draining, piping, diverting, or earth disturbance activities shall be permitted within a wetland. No more than 40% of the wetlands margin area shall be altered, regraded, or filled (noting that such limitation does not permit the alteration, regrading, filling of or building upon a wetland area, and noting further that the permitted encroachment into a wetlands margin area shall be measured independent of any other noncontiguous wetlands margin areas on a property). If this provision is found to be in conflict with any provisions of Chapter 26: Water, or any other local ordinance, or Pennsylvania or federal law, the provision which is more restrictive or which establishes the higher standard shall control.”

Part 10 defines Wetlands Margin as “that area which extends 75 feet from the wetland boundary or to the limit of the hydric soils, whichever is greater”.

The required 75-foot wide wetlands margin shall be shown and dimensioned on the plan. It appears a small portion of the proposed parking lot will be located within the wetlands margin. The plan shall also be revised to provide the area of the existing wetlands margin and the area of disturbed margin area (in square feet and percent).

3. In accordance with Section 401.3.E.(1), “limited disturbance of moderately steep slopes and very steep slopes shall be permitted under the conditions described below:

Steep Slope Category	Percent	Maximum Area of Disturbance
Moderately Steep Slope	15% to 25%	60%
Very Steep Slope	25% or greater	10%

Disturbance refers to any development activity, including regrading and stripping of vegetation.



The use of regraded slopes shall be minimized and is generally discouraged. The use of retaining walls for grade changes is encouraged.” *The existing steep slopes shall also be shown on the Grading and Utility Plan (Sheet GU-1) and the Erosion and Sediment Pollution Control Plan (ESPC-1). The Slopes Table on Sheets ER-1 and PRI-1 shall be revised to list the disturbed area of each steep slope category (in square feet and percent) to determine compliance with this Section.*

4. In accordance with Section 401.3.E.(2), “all applications for land development approval in areas where very steep slopes are proposed to be disturbed or where 40% or more of the lot area exceeds 15% slope shall be considered and processed as conditional uses”. *The plan shall be revised as described in Comment 3 to determine compliance with this Section.*
5. In accordance with Sections 402.7 and 403.1.A.(1)(b)(1), accessible parking spaces for disabled persons shall be provided in accordance with the Federal requirements as set forth in the Americans with Disabilities Act”. *Per the 2010 ADA Standards for Accessible Design, every six (6) or fraction of six (6) handicap parking spaces shall include one (1) van accessible space. A van accessible space with access aisle shall have a total width of 16-feet, either an 11-foot wide space with a 5-foot wide access aisle or an 8-foot wide space with an 8-foot wide access aisle. The proposed handicap parking space is 10-foot wide with a 5-foot wide aisle (total width of 15-feet) and the plan shall be revised accordingly.*
6. In accordance with Sections 403.1.B.(1) and (7), “adequate off-street loading and unloading space, with proper access from a street, highway, common service driveway or alley, shall be provided for all nonresidential uses. Such space shall be sufficient in size and design to accommodate the maximum demand generated by the use on the lot”. “The minimum size loading space shall be 30 feet in depth and 10 feet in width, with an overhead clearance of 14 feet.” *The required loading space shall be shown and labeled on the plan.*
7. In accordance with Section 403.1.G, “all parking and loading areas shall be landscaped pursuant to § 27-502, Subsection 7, hereof”. *Refer to Comments 11 and 12.*
8. In accordance with Sections 403.1.O and 502.6.A, off-street parking areas, and areas of intensive pedestrian use shall be adequately lighted. All such lighting shall be designed and located so as to direct light away from adjacent residences. Lighting should be arranged to minimize uncontrolled light, glare, overlighting, light trespass and sky glow. *The proposed light located nearest the intersection of the proposed driveway and Twin Falls Road is located outside the property line and shall be relocated. In addition, the illumination from that proposed light exceed 0.5 footcandles at the property line. The plan shall be revised. Also refer to SALDO Comment 37.*
9. In accordance with Section 402.6 and Schedule II, one (1) parking space for every 200 gross square feet of the proposed office shall be provided. *The parking calculation provided on Sheet CS-1 utilizes the building footprint. The existing structure is two (2) stories, and the parking calculation shall be revised to utilize the gross floor area. The number of parking spaces shown in plan view shall be revised accordingly.*
10. In accordance with Section 502.7.B, “trees or other approved natural landscaping features, such as shrubbery, grass areas, ornamental bushes or flower beds, shall be required in a ten-foot wide landscaped area along any street side property line except, at driveway opening. A four-foot wide landscaped area shall be required along each non-street side property line except at driveway



openings. All such plantings shall be located on the site in a manner that will not interfere with traffic and safe sight vision. The maximum height of shrubbery and bushes shall be 32 inches.” *The required landscape buffers shall be shown and dimensioned on the plan to determine compliance with this Section. The distance between the proposed parking and northern property line along Seven Bridges Road (S.R. 1019) is only 9-feet and shall be revised to meet the required 10-foot width.*

11. In accordance with Section 502.7.B.(1), “a minimum of one tree shall be planted within the perimeter planting area for every 50 feet of the perimeter of the parking area exclusive of driveway widths. Required perimeter trees shall be planted no less than 25 feet and no more than 50 feet apart. Interior landscaped islands within parking areas shall include one shade tree for each 20 feet in length and five shrubs for each 40 feet in length.” *The parking perimeter landscaping and a tabulation showing the required and proposed plantings shall be provided on the plan as required.*
12. In accordance with Section 502.7.C, “All nonresidential parking lots for off-street parking or for the storage or movement of motor vehicles located in front of the building shall be separated from the ultimate right-of-way line by a buffer yard not less than 25 feet in width. The buffer yard shall include a dense screen planting of trees, shrubs or other plant barrier to visibility, airborne particles, glare and noise. Such screen planting may be located within the required front yard setback and shall be in accordance with the requirements” in Subsections (6) and (7). *The required berm and plantings shall be shown along Twin Falls Road to provide the required screen between the front property line and the proposed driveways.*
13. In accordance with Section 511.21.G, “in order to expedite the review and approval process, any adaptive reuse project within the ED District may submit land development plans for preliminary and final approval”. *The proposed development is an adaptive reuse related to the conversion of the existing dwelling to an office, therefore preliminary/final plans are permitted. No action is required.*

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

14. In accordance with Section 602.1.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 center, a certification with “return receipt requested” indicating that the letters had been sent, shall be submitted to the Township.” *Notifications to abutting property owners are required. A list of recipients with copies of the certification shall be submitted.*
15. In accordance with Section 603.1.A.(2), the plan shall include the “zoning regulations in a tabular format including ordinance requirements and proposed conditions including, but not limited to, yard setbacks, impervious cover, building coverage, minimum lot size requirements, minimum lot frontage, etc.” *The Zoning Requirements on Sheet CS-1 shall be revised to include the maximum permitted and proposed building coverages.*
16. In accordance with Section 603.1.A.(7), the plan shall include “proof of any, modification, variance or special exceptions which may have been granted by the Township Zoning Hearing



Board". *The date of the Zoning Hearing Board decision shall be included on Sheet CS-1.*

17. In accordance with Section 603.1.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 title report shall be submitted as required.*
18. In accordance with Section 603.1.A.(12) and 703.1.D, all submissions to, correspondence with, and approvals/permits from the following agencies shall be provided.
 - a. Smithfield Sewer Authority – Sewage Capacity
 - b. Pennsylvania Department of Environmental Protection – Sewage Planning
 - c. Fire Company
 - d. Monroe County Planning Commission
19. In accordance with Section 603.1.D.(4), the plan shall include "the location, name and right-of-way and cartway widths of all streets bordering the land to be developed or subdivided, including State and local traffic route numbers". *The entire length of existing right-of-way along Twin Falls Road shall be shown on the plan.*
20. In accordance with Section 603.1.D.(10), "if aerial photography is used in the preparation of a plan the name of the company producing the aerial information and date the aerial photography was flow shall be provided on the plan. If significant man-made features or natural activities, as identified by the Township Engineer, has changed the land since the date of the aerial additional/revised aerial photography will be required." *The date of the Lidar contours shall be provided on the plan.*
21. In accordance with Section 603.1.D.(13)(h), "wetlands shall be defined by metes and bounds". *The existing wetlands shall be defined by metes and bounds as required.*
22. In accordance with Section 603.1.G.(2), the plan shall include "building setback lines established by zoning or other ordinances or deed restrictions with distances from the right-of-way line. Building setback lines from floodplains, water features and wetlands shall be shown as chords and defined by metes and bounds. Building setback lines shall be truncated where an easement, buffer, or right-of-way is proposed which would limit the ability of future homeowners from building.a Resource Impact and Conservation Analysis is required." *The required building setback lines shall end at the 100-foot outer wetland buffer.*
23. In accordance with Section 603.1.G.(13), "for all subdivision or land developments, except for single-family detached residential, 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." *The Truck Turning Template Plan (Sheet TTT-1) shows*



the fire truck exiting the paved driveway and shows conflicts between the fire truck and parking spaces. The Turning Template shall be revised. In addition, Sheet TTT-1 shall be provided to the fire department for review and comment.

24. In accordance with Section 603.1.G.(17), the Preliminary Plan shall include “a soil erosion and sediment control plan and design basis of surface and subsurface drainage for protection against soil erosion during and after the construction period”. *The proposed limit of disturbance is 0.80 acres. The following comments are related to our review of the Erosion and Sediment Pollution Control Plan and Details:*
 - a. *A rock filter or compost filter sock shall be added below the proposed 465 contour located west of the existing garage.*
 - b. *CS-1 shall be extended west toward Twin Falls Road and CS-4 shall be extended east toward Marshalls Creek. CS-5, 6, and 7 shall be extended or additional compost filter sock shall be added between each. Compost filter sock shall also be added between the proposed driveway/grading and existing garage.*
 - c. *The type of erosion control matting for the proposed swale and steep slopes shall be clearly identified in plan view.*
 - d. *Standard E&S Plan Note 14 references S.R. 0611 and shall be revised.*
 - e. *Swale 1 shall be labeled in plan view.*
 - f. *Landscaping is required and shall be included in the Construction Sequence.*
25. In accordance with Section 603.1.G.(21), the plan shall include “a statement or certificate by the applicant/developer indicating that, to the best of his or her knowledge, the plans are in conformity with engineering, zoning, building, sanitary and other applicable Township ordinances and regulations and, if they are not so conforming, detailing the areas of nonconformance and the reasons for requesting a modification to Township standards.” *The required statement shall be provided on Sheet CS-1.*
26. In accordance with Section 603.1.G.(24), “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.” *Approval from the Smithfield Sewer Authority shall be provided upon receipt.*
27. In accordance with Section 603.1.H.(3)(b)(1), the plan shall include a storm sewer “profile of existing ground surface with elevations at top of manholes or inlets”. *The top of grate elevation utilized in the Pond Report (467.70) is inconsistent with that presented in the Driveway Culvert Profile on Sheet UP-2 (467.50). The Report or Profile shall be revised.*
28. In accordance with Section 1002.5, “where no public water supply is available to the subdivision or land development, the Township shall require the applicant/developer to obtain from a licensed



testing laboratory certificates of approval for each lot as to the quality and adequacy of the water supply proposed to be utilized by the applicant/developer”. *The required certificates shall be provided.*

29. In accordance with Section 1002.7.E, “the purpose of steep slope regulations is to conserve and protect those areas having steep slopes from inappropriate development and excessive grading; to prevent potential dangers caused by erosion, stream siltation, and soil failure; and to promote uses in steep slope areas that are compatible with the preservation of existing natural features, including vegetative cover by restricting grading of steep slope areas. Steep Slope Area shall be subject to use regulations identified below.

Steep Slope Category	Percent	Maximum Area of Disturbance
Moderately Steep Slope	15% to 25%	60%
Very Steep Slope	25% or greater	10%

Disturbance refers to any development activity, including regrading and stripping of vegetation. The use of regraded slopes shall be minimized and is generally discouraged. The use of retaining walls for grade changes is encouraged.” *The existing steep slopes shall also be shown on the Grading and Utility Plan (Sheet GU-1) and the Erosion and Sediment Pollution Control Plan (ESPC-1). The Slopes Table on Sheets ER-1 and PRI-1 shall be revised to list the disturbed area of each steep slope category (in square feet and percent) to determine compliance with this Section. Also refer to ZO Comment 3.*

30. In accordance with Section 1002.7.F, “natural areas containing rare or endangered plants and animals, as well as other features of natural significance exist throughout the Township. Some of these have been carefully documented (e.g., by the Statewide Natural Diversity Inventory), whereas for others, only the general locations are known. Subdivision applicant/developers shall take all reasonable measures to protect significant natural areas and features either identified by the Township Map of Potential Conservation Lands or by the applicant/developer’s Existing Resources and Site Analysis Plan by incorporating them into proposed conservation open space areas or avoiding their disturbance in areas proposed for development.” *A PNDI Search shall be completed and submitted.*
31. In accordance with Sections 1008.1 and 3, and Appendix B, “where a subdivision abuts or contains an existing street, the applicant/developer shall be required to improve said street to Township standards, and, provide an additional ultimate right-of-way width to conform to the standards set by the Township”. *Per Appendix B, the required right-of-way width along Twin Falls Road is 50-feet. The existing right-of-way width is 33-feet and the plan shall be revised. The existing right-of-way line along Twin Falls Road shall be extended for its entire length.*

In addition, and area of PA DOT Condemnation is shown along Twin Falls Road and the plan suggests the centerline of Twin Falls Road will be realigned with future roadway improvements. The PennDOT Plans providing the realigned centerline of Twin Falls Road shall be provided with a subsequent submission and referenced on the plan.



32. In accordance with Section 1011.1, “intersection streets and driveways shall intersect at a 90° angle for a minimum of 75 feet beyond the intersection of the right-of-way lines for streets and 20 feet for driveways”. *As discussed, the existing and required rights-of-way for Twin Falls Road shall be shown on the plan. The required 20-feet shall be dimensioned from the required right-of-way line.*
33. In accordance with Section 1014.1.A, “curbs shall be installed along each side of every arterial, collector and local street, access driveway, and parking lots in a land development where pedestrian traffic will be traveling adjacent to the street, access driveway, or parking lot”. *The plan shall be revised to provide curbs as required. A detail shall be added to the plan.*
34. In accordance with Section 1015.1, “sidewalks shall be required on both sides of all streets in major subdivision plans and land developments. Street sidewalks shall have a minimum width of four feet, unless otherwise approved by the Board of Supervisors. There shall be a minimum three foot-wide planting strip, between the curb and sidewalk along local streets and 10 feet along collector or arterial streets. This grass planting strip can be used for the location of the underground utilities.” *The Applicant shall discuss with the Township the need for sidewalk along Twin Falls Road and Seven Bridges Road (S.R. 1019).*
35. In accordance with Sections 1015.3 and 4, “sidewalks shall be designed and constructed in accordance with the applicable provisions of PennDOT Publication 408. Sidewalks shall be constructed with bituminous expansion joints at intervals not more than 20 feet.” “Sidewalks shall be constructed of four-inch depth of Class A Air Entrained 4,000 psi concrete on a four-inch depth 2B stone base. A concrete sealant/curing compound shall be applied to all sidewalk to aid in curing and protect the concrete.” *Concrete sidewalk is proposed between the parking lot and building. A detail shall be provided on the plan.*
36. In accordance with Section 1016.3, “all signs shall meet current PennDOT specifications”. *Details for the proposed Do Not Enter and One-Way signs shall be provided on the plan.*
37. In accordance with Section 1020.1.B, “any other outdoor lighting, such as building and sidewalk illumination, signs, driveways with no adjacent parking and ornamental lighting, shall be shown on the lighting plan in sufficient detail to allow determination of the effects to adjacent properties, traffic safety and overhead sky glow. The objective of these specifications is to eliminate off-premises effects. No use shall produce glare off the premises by illumination originating on the premises. No bare or direct light source shall be visible beyond the lot lines. Only diffused or reflected lights shall be visible beyond the lot line. Illumination from light originating on the site shall not exceed 0.5 footcandles at the lot line.” *The proposed light located nearest the intersection of the proposed driveway and Twin Falls Road is located outside the property line and shall be relocated. In addition, the illumination from that proposed light exceed 0.5 footcandles at the property line. The plan shall be revised. Also refer to ZO Comment 8.*
38. In accordance with Section 1024.4, “street trees shall be provided at the rate of not less than two trees for every 10 parking spaces, which shall be in addition to any other requirements for buffering or landscaping”. *Two (2) street trees are required and shall be shown on the plan. A tabulation listing the required and proposed plantings shall also be included on the plan.*



39. In accordance with Section 1024.5, “all parking areas shall be striped to indicate the location and dimensions of parking spaces. Directional arrows shall be indicated on the pavement to control the flow of traffic”. *Details for the proposed parking space striping and directional arrows shall be provided on the plan. In addition, a detail for a Stop Bar is provided on Sheet DET-1, however none is shown in plan view. The plan shall be revised accordingly.*
40. In accordance with Section 1026.1, “outdoor collection stations shall be provided by applicant/developer for garbage and trash and for recyclable materials when individual collection is not made and indoor storage is not provided. Stations shall be provided in all zoning districts except those devoted solely to single-family detached dwellings”. *Refuse collection shall be addressed.*
41. In accordance with Sections 1101.1.C and 1101.1.C.(2)(c), street trees are required along all existing streets and shall be spaced to permit the healthy growth of each tree, but in no instance shall they be closer than 40 feet on center nor further than 50 feet on center for each side of the street. *Six (6) to seven (7) street trees are required along Twin Falls Road (279.66 feet) and 10 to 12 street trees are required along Seven Bridges Road (S.R. 1019) (455.36-feet). The plan shall be revised for compliance with this Section. A tabulation listing the required and proposed plantings shall also be included on the plan.*
42. In accordance with Section 1101.1.E.(2), “when a nonresidential parking area is located within 100 feet of a public street or is adjacent to a residential use, the perimeter of the parking area that is adjacent to the public street and residential lot shall be softened by a continuous low hedge around the outside perimeter. Required buffer shrubs may not be used to meet this requirement.” *The parking lot is located within 100-feet from Seven Bridges Road (S.R. 1019) and the plan shall be revised to provide the required continuous low hedge.*
43. In accordance with Section 1101.1.F(2)(e)(1), “there shall be a minimum of one shade tree and three shrubs proposed for every 30 linear feet of stormwater management facility perimeter”. *The required landscaping with a tabulation of required and proposed plantings shall be provided on the plan.*
44. 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:
 1. Payment of recreation fees.
 2. Construction of recreation facilities.
 3. Dedication of recreation land or preserved open space to the Township or its designee.
 4. A combination of these alternatives.”

Open space and recreation facilities and/or a fee in-lieu-of shall be provided.



45. In accordance with Section 1301.5.D, “the Board of Supervisors may require the applicant/developer to provide a permanent drainage easement along any watercourse located within or along the boundary of any property being subdivided or developed. The required width of any such easement shall be determined by determining the extent of the width of flow from a fifty-year twenty-four-hour design storm or as determined by one of the following; United States Army Corps of Engineers, Pennsylvania Department of Environmental Protection or other public agency having jurisdiction. The purpose of the easement is to maintain the free flow of the watercourse. The applicant/developer will retain the easement until such time as one of the following is accomplished:
- (1) The easement is offered for dedication by the applicant/developer and accepted by the Township.
 - (2) If an easement required by the Township is established, but not to be dedicated, the maintenance shall then be the responsibility of the individual lot owners through whose property the easement passes. For land developments, the maintenance shall then be the responsibility of the applicant/developer.
 - (3) A homeowners’ association or their legal entity approved by the Township assumes responsibility for the maintenance of the development, including the easements.

The Applicant shall discuss with the Township a permanent easement along Marshalls Creek.

46. In accordance with Section 1301.6.B.(5), “the top of the outlet box shall be set at the 100-year water surface elevation and shall have an open grate”. *The top of grate elevation at the outlet structure shall be adjusted for compliance with this Section.*
47. In accordance with Section 1301.7.Q, “the minimum diameter of all storm drainage pipe shall be 18 inches or an equivalent thereto. Where headroom is restricted, equivalent pipe arches may be used in lieu of circular pipe”. *The proposed storm sewer has a diameter of 15-inches and shall be revised for compliance with this Section.*
48. In accordance with Section 1302.3.H, “in general, swales for surface runoff shall have a minimum slope of 2%”. *The proposed slope of Swale 1 is less than 2% and the grading shall be revised.*
49. In accordance with Section 1302.4.A, “no excavation or fill shall be made with a face or surface slope steeper than three horizontal to one vertical unless a retaining wall or other soil retention method, constructed in accordance with approved standards, is provided to support the face or surface slope of said excavation or fill”. *Grading proposed between the parking lot and existing garage is shown at a slope of 2:1 and shall be revised for compliance with this Section.*
50. 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 from the Smithfield Sewer Authority and PADEP shall be provided upon receipt. All*



submissions to, correspondence with, and approval from PADEP shall be provided.

51. In accordance with Section 1503.3, “no final plan shall be signed by the Board of Supervisors for recording with the Recorder of Deeds unless:
- A. A financial security in accordance with § 22-1503 is accepted by the Board of Supervisors and the Board of Supervisors has received confirmation that the public utility or municipal authority has been provided with financial security, if applicable; and/or,
 - B. The improvements required by this Chapter have been installed, in accordance with § 22-1504.”

A construction cost estimate shall be submitted for review to determine the required financial security.

STORMWATER MANAGEMENT ORDINANCE COMMENTS

52. In accordance with Section 223.1.A, “for water quality and stream bank erosion, the applicant shall design a water quality BMP to detain the proposed conditions two-year, twenty-four-hour design storm to the existing conditions one-year flow using the SCS Type II distribution. The applicant shall demonstrate that applicant has made provisions (such as adding a small orifice at the bottom of the outlet structure) so that the proposed conditions one-year storm takes a minimum of 24 hours to drain from the facility from a point where the maximum volume of water from the one-year storm is captured (i.e., the maximum water surface elevation is achieved in the facility). At the same time, the objective is to not attenuate the larger storms in “no detention” areas (District C) only. This can be accomplished by configuration of the outlet structure not to control the larger storms, or by a bypass or channel to divert only the two-year design storm into the basin or divert flows in excess of the two-year storm away from the basin.” *The basin design shall be revised to provide a peak flow reduction of the 2-year post development to the 1-year predevelopment.*
53. In accordance with Section 223.1.J.(1)(d)(2)(a), Permitted Activities/Development in the outer wetland buffer include “stormwater conveyance required by the Township, buffer maintenance and restoration, the correction of hazardous conditions, agricultural activities, plant nurseries, parking lots constructed to existing grade, temporary fairs and carnivals, accessory uses for residential purposes, private sportsmen's club activities, athletic facilities, orchards, wildlife sanctuaries, boat launch sites, roads constructed to existing grade, stream crossings permitted by DEP and 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”. *The proposed driveway, parking area and associated grading and the proposed building additions are located within the outer wetland buffer. A waiver from Section 223.1.J.(1)(d)(2)(a) is requested. Also refer to Comment 56.*

The plan indicates that 23.7% of the total outer wetland buffer will be disturbed for the proposed construction.

54. In accordance with Section 223.1.J.(1)(d)(2)(b), “no more than 20% of the cumulative outer buffer on the subject parcel shall be altered by the activities permitted in accord with § 26-223, Subsection 1J(1)(d)2)”. *A waiver from Section 223.1.J.(1)(d)(2)(b) is requested. The request*



indicates that 23.7% of the total outer wetland buffer is being disturbed for the construction of the driveway and parking area and associated grading. The request shall also reference the proposed building additions.

55. In accordance with Section 223.1.J.(3)(a)(2), Permitted Activities/Development in the outer stream buffer include “stormwater conveyance required by the Township, buffer maintenance and restoration, the correction of hazardous conditions, agricultural activities, plant nurseries, parking lots constructed to existing grade, temporary fairs and carnivals, accessory uses for residential purposes, private sportsmen's club activities, athletic facilities, orchards, wildlife sanctuaries, boat launch sites, roads constructed to existing grade, stream crossings permitted by DEP and 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.” In addition, and in accordance with Section 223.1.J.(3)(a)(4), “no more than 20% of the cumulative outer buffer on the parent tract shall be altered by the activities permitted in accord with § 26-223, Subsection 1J(3)(a)2”. *The proposed driveway, parking area and associated grading and the proposed building additions are located within the outer stream buffer. A calculation showing the existing area and the proposed disturbed area (in square feet and percent) of the outer stream buffer shall be provided on the plan. Also refer to Comment 56.*

A waiver is requested from Section 223.1.J.(3)(a)(4) and shall be revised to reference Section 223.1.J.(3)(a)(2). It should be noted that a waiver from Section 223.1.J.(3)(a)(4) may still be required based on the amount of disturbance within the outer stream buffer.

56. In accordance with Section 223.1.J.(7), “Improvements to Existing Structures in Outer Buffers. The provisions of this § 26-223, Subsection 1J, do not require any changes or improvements to be made to lawfully existing structures in buffers. However, when any substantial improvement to a structure is proposed which results in a horizontal expansion of that structure, the improvement may only be permitted by the granting of the waiver from the requirements of this Part. In considering a waiver application, the Board of Supervisors shall determine whether the applicant has presented evidence of hardship in addition to the standards for waivers set forth in Subpart 2I.” *The existing dwelling located in the outer stream and outer wetland buffers is being expanded horizontally and waivers will be required. Requests for waivers from Sections 223.1.J.(1)(d)(2)(a), 223.1.J.(1)(d)(2)(b), 223.1.J.(3)(a)(2), 223.1.J.(3)(a)(4) shall include expansion of the existing building.*
57. In accordance with Section 225.1.A.(3)(a), infiltration BMPs intended to receive runoff from developed areas shall be selected based on suitability of soils and site conditions and shall be constructed on soils having “a minimum depth of 24 inches between the bottom of the BMP and the limiting zone”. *An existing low spot is being utilized as the proposed basin and no grading is proposed. A waiver should be requested.*
58. The project site is located within Stormwater Management District C, Provisional Direct Discharge District. In accordance with Section 226.1, “development sites which can discharge directly to the main channel or major tributaries or indirectly to the main channel through an existing stormwater drainage system (i.e., storm sewer or tributary) which meets the "Downstream Hydraulic Capacity Analysis" in § 26-229, Subsection 9, and is shown by the design professional to not cause a downstream problem, may allow an increase in flow as long as no downstream harm is



demonstrated. However, sites in District C shall comply with the criteria for water quality and stream bank erosion (§ 26-223) and groundwater recharge (§ 26-225). If the proposed conditions runoff is intended to be conveyed by an existing stormwater drainage system to the main channel, assurance must be provided that such system has adequate capacity to convey the increased peak flows or will be provided with improvements to furnish the required capacity. When adequate capacity of the downstream system does not exist and will not be provided through improvements, the proposed conditions peak rate of runoff must be controlled to the existing conditions peak rate as required in District A provisions (i.e., ten-year proposed conditions flows to ten-year existing conditions flows) for the specified design storms. *The project site is located within District C and discharges stormwater directly to Marshalls Creek. Peak flow calculations are not required, however the requirements for water quality and groundwater recharge are required. Refer to Comment 52.*

59. In accordance with Section 226.6, “off-site areas that drain through a development site are not subject to release rate criteria when determining allowable peak runoff rates. However, on-site drainage facilities shall be designed to safely convey off-site flows through the development site.” *The drainage area shall extend to the high point located across Twin Falls Road and the calculations shall be revised accordingly.*
60. In accordance with Section 227.2, “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 consistent with current NOAA Atlas 14 Point Precipitation Frequency Estimates. If a hydrologic computer model such as PSRM or HEC-1 is used for stormwater runoff calculations, then the duration of rainfall shall be 24 hours. The SCS “S” curve shown in Figure B-1 of Appendix B¹¹ shall be used for the rainfall distribution.” *The NOAA data utilized in the peak flow calculations shall be provided in the Stormwater Management Report.*
61. In accordance with Section 227.6, “runoff curve numbers (CN) for both existing and proposed conditions to be used in the soil cover complex method shall be obtained from Table B-2 in Appendix B. Due to limitations of the TR-55 methodology, a minimum weighted curve number of 40 shall be utilized for calculations”. *The runoff curve numbers utilized for meadow in A soils, woods in A soils, and lawn in A and D soils are inconsistent with Table B-2 and shall be revised accordingly.*
62. In accordance with Section 228.3, “any stormwater management facility (i.e., BMP, detention basin) designed to store runoff and requiring a berm or earthen embankment required or regulated by this Part shall be designed to provide an emergency spillway to handle flow up to and including the 100-year proposed conditions, considering the primary outlet control structures are blocked. The height of embankment must provide a minimum 1.0 foot of freeboard above the maximum pool elevation computed when the facility functions for the 100-year proposed conditions inflow. Should any stormwater management facility require a dam safety permit under Chapter 105, the facility shall be designed in accordance with Chapter 105 and meet the regulations of Chapter 105 concerning dam safety which may be required to pass storms larger than the 100-year event.” *An emergency spillway shall be provided with supporting calculations showing compliance with this Section.*



63. In accordance with Section 229.1, “any earth disturbance must be conducted in conformance with Chapter 102”. *The proposed limit of disturbance is 0.8 acres. Refer to Comment 26 for comments related to our review of the Erosion & Sediment Pollution Control Plan and Details.*
64. In accordance with Section 233.2.B.(13), the plan shall include “a graphic and written scale of one inch equals no more than 50 feet; for tracts of 20 acres or more, the scale shall be one inch equals no more than 100 feet”. *The written and graphic scales on the Drainage Plans (Sheets D-1 and D-2) are incorrect and shall be revised.*
65. In accordance with Section 233.2.B.(20), the plan shall include “overland drainage patterns and swales with time of concentration paths”.
- a. *The post development basin inflow area and basin bypass area shown in plan view on Sheet D-2 are inconsistent with the areas utilized in the runoff calculations. It appears the areas shown on Sheet D-2 are correct and the calculations should be revised.*
 - b. *The area of impervious in the basin inflow area runoff calculation is low when compared to the plan view (Sheet D-2). It appears the impervious area of Twin Falls Road was not included in the area utilized in the calculation.*
66. In accordance with Section 233.2.B.(24), the plan shall include “a statement, signed by the applicant, acknowledging that any revision to the approved drainage plan must be approved by the Township and that a revised erosion and sediment control plan must be submitted to the Conservation District for a determination of adequacy”. *The required statement shall be placed on Sheet PC-1.*

STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS

67. The lengths and slopes near the ends of the time of concentration paths for the Predevelopment and Bypass Area calculations are the same and the time of concentration calculations shall be revised.
68. A portion of the proposed basin is located within the Right-of-Way of Twin Falls Road and within the identified PA DOT Condemnation Area. The calculations shall be revised to include only those areas within the property boundaries or proposed grading shall be provided to limit the proposed basin area to within the property boundaries. The high water elevation shall be within the property boundaries

MISCELLANEOUS COMMENTS

69. The receiving stream shall be referenced in Record Note 1 on Sheet CS-1. In addition, Record Note 20 on Sheet CS-1 discusses a steep slope easement, however no easement is provided and the note shall be removed.
70. It appears easements for the Wetland Buffer and Stream Buffer are provided on Sheets EAS-1 and EAS-2. Closure reports for the proposed easements shall be submitted for review.
71. A Do Not Enter and/or One-Way Sign shall be provided near the two (2) southeasternmost parking



spaces.

72. Grading and Utility Note 3 on Sheet GU-1 references a level spreader. The level spreader shall be shown and labled in plan view and calculations shall be submitted, or the note shall be revised/removed.
73. Grading and Utility Note 16 on Sheet GU-1 references an underground basin and shall be revised. In addition, Grading and Utility Notes 16, 19, 20, and 21 reference roof drains and downspouts. The roof drains and/or downspouts shall be shown in plan view.
74. A detail for the proposed Spaulding Cimarron CL1 light shall also be provided on Sheet LL-2.
75. The Stormwater Management Record Note on Sheet PCSM-1 shall be revised to reference the correct municipality. In addition, Stormwater Management Notes 5 and 6 do not appear applicable to this project and should be revised or removed.
76. NPDES Permit requirements are listed on Sheet PCSM-2. The proposed disturbance is under 1 acre and an NPDES Permit is not required. The plan shall be revised accordingly.
77. BMP 6.4.2 Infiltration Basin Notes on Sheet PCSM-2 shall be revised for applicability with this project's scope.
78. A detail for the proposed handicap ramp shall be placed on the plan.

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 Preliminary/Final 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.

If you should have any questions, please call me.

Sincerely,

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

JST/meh

cc: Julia Heilakka, Manager – Smithfield Township



Ronold J. Karasek, Esquire – Smithfield Township Solicitor
Matthew Helbers, Bureau Veritas – Smithfield Township Zoning Officer
Salvatore J. Caiazzo, P.E., Hanover Engineering – Applicant's Engineer
Russel C. Albert, Smithfield Sewer Authority – Applicant/Property Owner
Terri Timko, Manager, Smithfield Sewer Authority – Applicant/Property Owner
Melissa E. Hutchison, P.E. – T&M Associates