DAUPHIN COUNTY PLANNING COMMISSION

DAUPHIN COUNTY COURTHOUSE - HARRISBURG, PENNSYLVANIA 17101

STAFF OFFICE 112 Market Street, 2nd Floor Harrisburg, Pennsylvania 17101-2015 Telephone 717-234-2639 Fax 717-234-4058 e-mail: <u>planning@tcrpc-pa.org</u>

November 5, 2018

Cory J. Salmon, E.I.T, PMP Herbert, Rowland & Grubic, Inc. 369 East Park Drive Harrisburg, PA 17111

Re: Act 537 Sewage Facilities Plan for Halifax Township – Review/Comments

Dear Mr. Salmon:

The Dauphin County Planning Commission (DCPC) reviewed the proposed Act 537 Sewage Facilities Plan for Halifax Township at its meeting on November 5, 2018. The Commission commends the Township on this effort to maintain compliance with the PA Sewage Facilities Act, and thereby providing its citizens and businesses with an up-to-date sewage facilities program.

The DCPC staff has reviewed the plan and offers the following comments.

General Comments:

- 1. The plan appears well-researched, but the PA DEP General Act 537 Checklist should be filled out to make sure that all requirements are being met.
- 2. In Section 4.1.1 it should be noted that the land use numbers under Generalized Land Classifications are from 1995 and have, more likely than not, changed. This is especially true for the category of land available for development. Please note that any numbers taken from Tri-County Regional Planning Commission (TCRPC) in relation to regional growth planning have definitely been updated, with the most current being 2017. The new Regional Growth Management Plan (RGMP) for the tri-county area can be found online at TCRPC's website.
- 3. The plan has noted the Valley's Regional Comprehensive Plan and mapped existing conditions in all participating municipalities (Halifax Township, Halifax Borough, Wayne Township, Jackson Township and Rush Township.) As a joint effort by some of Halifax Township's nearest neighbors, the plan should be given due consideration when it comes to guiding future land use. It is unclear how Halifax Township will keep track of density requirements that are associated with the Character Areas.

Dauphin County Planning Commission Review Act 537 Plan Review – Halifax Township page 2

In addition to the general comments listed above, the following comments are focused on consistency with county, regional and state planning programs, not the technical /engineering elements of such a document.

1. The Plan references Tri-County Regional Planning Commission's Regional Growth Management Plan (RGMP). Growth projections for Halifax Township come directly from the RGMP, and some of the planning areas for sewage facilities do take place within the Planned Growth and Community Services Areas as established by the RGMP.

However, there are sewage planning areas that occur outside of these growth boundaries. While the County understands that plans created with a regional perspective may not be 100% consistent with what happens at the municipal level, it is generally accepted that extending sewer service areas is a way to facilitate growth. Growth management best practices should be used when planning for future growth. The most common of these tools is a zoning ordinance, which Halifax Township does not currently administer. The municipality should be aware that there is no guarantee that the development that moves in to the various Character Areas will match with their themes without a zoning ordinance in place to encourage it to occur.

2. The plan is generally consistent with the 2017 Dauphin County Comprehensive Plan, also referenced in Chapter Four. Once again, much of this consistency comes from the referenced VRCP whose Character Areas strike a balance between In-Town Corridor development, developed rural area, and natural/agricultural resources protection. This is consistent with the *Growing Within Our Environment* and the *Growing Our Communities* sections of the DC Comprehensive Plan.

However, it should be noted that the Conservation Areas as defined by the VRCP, shown in in Plan Map 1 – Character Areas in Chapter Four, appear to show a lack of conservation areas around water features (streams) which continues to be an important issue for the County when addressing water quality and stormwater management.

The same consideration about growth management best practices from the above section can also be applied here.

3. The Commission supports the Township's intent to update its Act 537 Plan and supports the connection between the Act 537 Plan and the existing Valley's Regional Comprehensive Plan.

Dauphin County Planning Commission Review Act 537 Plan Review – Halifax Township page 3

The Dauphin County Planning Commission appreciates the opportunity to review this planning document, and wishes the Township success in its implementation. Please direct any questions concerning this review to Alexa Korber at the above staff office.

Sincerely,

John A. Kerschner, AICP Chairman

Responses to Dauphin County Planning Commission Comments Dated November 5, 2018

General Comments:

- 1. Acknowledged and corrected, the PA DEP General Act 537 Checklist is filled out and included in the Final Plan.
- 2. As identified in Section 4.18 of the Halifax Township Act 537 Plan, the most current Regional Growth Management Plan 2040 Update adopted on September 28, 2017 by the Tri-County Regional Planning Commission was acknowledged.
- 3. Acknowledged.

County/Regional Considerations:

- 1. Acknowledged.
- 2. Acknowledged. The Halifax Township Planning Commission reviews and makes recommendations on all subdivision and land development plan applications prior to action on the same by the Halifax Township Board of Supervisors. Protection of conservation areas around water features (streams) to address water quality and stormwater management is currently enforced via the current Halifax Township Subdivision and Land Development Ordinance which requires in Section 508 all regulated activities to include, to the maximum extent practicable, measures to:
 - i. Minimize disturbance to floodplains, wetlands, natural slopes, existing native vegetation and woodlands.
 - ii. Create, maintain, or extend riparian buffers and protect existing forested buffers.
 - iii. Provide trees and woodlands adjacent to impervious areas wherever feasible.
 - iv. Minimize the creation of impervious surfaces and the degradation of Waters of the Commonwealth and promote groundwater recharge.
 - v. Protect natural systems and processes (drainageways, vegetation, soils, and sensitive areas) and maintain, as much as possible, the natural hydraulic regime.
 - vi. Incorporate natural site elements (wetlands, stream corridors, mature forests) as design elements.
 - vii. Avoid erosive flow conditions in natural flow pathways.

- viii. Minimize soil disturbance and soil compaction.
 - ix. Minimize thermal impacts to Waters of the Commonwealth.
 - x. Disconnect impervious surfaces by directing runoff to pervious areas wherever possible, and decentralize and manage stormwater at its source.
- 3. Acknowledged.



Kenneth E. Bechtel II, Chairman Brad Bruner, Supervisor Randy Paul, Supervisor Steven Schreffler, Supervisor R. Scott McBurney, Supervisor

Wendy M. Wentzel, Secretary/Treasurer Corey Stazewski, Roadmaster Levi Swigart – Assistant Roadmaster

December 5, 2018

Halifax Board of Supervisors 102 Fisher Street Halifax PA 17032

To the Halifax Township Board Members,

At the December 3, 2018 Halifax Township Planning Commission meeting, the commission acted to provide no formal comment to the Halifax Township Board of Supervisors relative to the adoption of the proposed Act 537 Plan.

Respectfully Submitted,

Chandy Daul P.E.

Halifax Township Planning Commission

cc: file

Email: <u>halifaxtownship@comcast.net</u> Web site: <u>www.halifaxtownship.net</u> Fax #; 717-896-2904