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PHASE 1B PRELIMINARY LAND DEVELOPMENT PLAN REVIEW LETTER #1

MIDDLESEX TOWNSHIP, CUMBERLAND COUNTY, PA

Attn: Mr. Bud Grove, Township Engineer

Preliminary Land Development Plan for Pennsylvania Digital 1 (PAX-1) Phase 1-B

Middlesex Twp. Plan No. TPF 25-25

January 22, 2025

We have completed our review of the following information for the above-referenced project:

Submission:	Dated:	Last Revised:
Plan Set for Phase 1B (96 sheets)	11/26/2026	--
Post Construction Stormwater Management Report for Phase 1B (SWM Report)	November 2025	--
Waiver Request Letter for Phase 1B	11/25/2025	--
Letter of Transmittal	11/26/2025	--
Middlesex Twp Application and Checklist	11/26/2025	--

The applicant has submitted the following requests for relief:

Requested Waiver(s):	Ordinance Section:
Plan Size and Scale	SALDO 501.A.2
Location Map Scale	SALDO 501.A.6
Depressed Driveway Curb	SALDO 703.I.4
Sidewalks (See Waiver Note 1)	SALDO 707.A.1

Scale of maps and exhibits within the EIA	SALDO 718.D.3.a, 718.D.4, 718.D.4.b, 718.D.4.c, 718.D.4.d
Detention Basin Side Slopes > 4:1	SWM 303.J.3
Swale Grades < 2.0% (See Waiver Note 2)	SWM 303.K.9
Infiltration of Stormwater (See Waiver Note 3)	SWM 303.B.2
Dewatering time > 48 Hrs.	SWM 303.H.18

We offer the following comments (* - Indicates comments not addressed from previous review letters):

WAIVER NOTES

1. In the Waiver Request Letter, this section appears to be cited incorrectly. Is it the applicant's intent to request a waiver of section 707.A.10?
2. In the Waiver Request Letter, this section references the shallow grade of swales around the PPL Substation, but the PPL substation is located within Phase 1A. Please clarify.
3. Recommendations regarding a potential modification of infiltration requirements on this site are provided as a separate memo.

ZONING

1. A minimum lot width of 200 feet is required [24.03]. Because it does not have roadway frontage, lot 1B does not meet this requirement. As discussed, an alternative arrangement is to establish financial security for the construction of PA Data Drive before any approvals of the Phase 1B Land Development plan are requested.
2. Provide required and proposed max lot coverage in the zoning data table (sheet 2). Only max impervious coverage is listed [Table 2.18].
3. Confirm the Lot 1B Area. The Zoning regulations (sheet 2), tract map (sheet 3), existing/proposed conditions (sheet 4) and existing conditions plan (sheet 8) provide differing information [2.18(F)]. Revise sheets for consistency.
4. Confirm the Lot 1B impervious coverage and percentage. Zoning regulations (sheet 2) and the existing/proposed conditions (sheet 4) provide differing information. [2.18(F)]. Revise sheets for consistency. Include any sidewalks in the impervious coverage calculation.
5. Update the 1,000 foot building façade setback (sheets 10-11, 20-26) [2.18(G)1.a]. Based on the 12/22/25 call our understanding is the façade should follow the entire property as the property is bound by public streets, residential uses and/or residential districts. Agricultural Districts (A) allow for residential dwellings as a permitted use and are deemed a residential district.
6. Submit Architectural Plans documenting compliance with the building façade requirements [2.18(G)1].

7. Provide the required foundation plantings at the main entrances for each building and each applicable building facade [2.18(G)1.c.(1)(a)ii].
8. Ground level and roof mounted mechanical equipment requires screening. Generator yards are deemed as mechanical equipment. The generator yard west of Building 5 shall include screening along the west side (sheets 52 & 56) [2.18(G)2.b].
9. For the Floodplain Conservation Overlay District, as depicted in the Legend (sheets 8-9, 14-15), the same line type is used for multiple features and does not match the plan. Please reconcile [2.19].
10. The Riparian Buffer Overlay District, as depicted in the Legend (sheets 8-9, 14-15), uses the same line type for multiple features and does not match the plan. Please reconcile [2.21].
11. Where slopes of twenty-five (25) percent or greater are located within the fifty (50) foot riparian buffer area, this buffer area shall extend the entire distance of the steep sloped area (sheets 8-11) [2.21(E)3.b].
12. Provide a Water Feasibility Study [3.04(G)2.e]. HRG understands that water supply is being reviewed in detail by the Middlesex Township Authority. However, HRG has performed a cursory review of the water supply information contained within the Environmental Impact Assessment (EIA), and has provided comments under the EIA section of this letter.
13. Provide an Interconnection Agreement from the electric service provider [3.04(G)2.f]. A 10/30/25 PPL confirmation of service availability letter was provided as Exhibit 5 in Section D.10 of the EIA (page 721 of 761). The letter notes that PPL has the ability to provide 1.35 GW of peak demand load, also noting that system upgrades will be required. It notes the applicant needs to complete all agreement requirements by January 2026 in order to provide service by June 2027. The applicant shall provide the interconnection agreement once available along with known impacts on electric rates or availability for other users.
14. Provide a Noise Study [3.04(G)2.g].
15. Provide the lighting height in the luminaire schedule (sheet 61) [4.10]. Similar to previous phases, a 30-foot height would require a zoning variance. A 25-foot height may be permitted at the discretion of the Board of Supervisors, when full cutoffs are provided. If a 25 height is planned, provide a lighting cut sheet confirming that full cutoffs are provided and note this in the luminaire schedule description.
16. Provide the Parking Analysis Report to support the parking requirements (sheet 2) [Table 4.15.1 & 4.15(D)2].
17. Provide the required/proposed ADA parking space count in the Zoning Regulations (sheet 2) [4.15(C)].
18. ADA parking spaces are shown on sheets 20-25. There are no sidewalks shown or building doors shown, the accessible route is not clear. Show the accessible route and grading to the door on the Plan. A concrete walk detail is included on sheet 69 [4.15(C)].
19. It is not clear if/where curbing is proposed. It appears curbing is needed for stormwater conveyance, parking area definition, landscape delineation/protection and pedestrian/vehicle separation. Show and label proposed curbing (sheets 20-25). A curb detail is included on sheet 69 [4.15(F)4].

20. Provide required/proposed loading spaces in the Zoning Table (sheet 2); recommended under Parking Requirements [4.15(G) & 2.18(G)2.a].
21. The Cover Sheet drawing index includes sheet numbers (C1B 001-808 and ES1 002-306). Include the sheet numbers (1-96) in the index to facilitate the plan review. Comment applies to all Plan sets.

SUBDIVISION AND LAND DEVELOPMENT

1. Address the current status of existing buildings and associated utilities on the subject property and the limits of any proposed demolition associated with them. [501.A.26 & 501.C.1&2].
2. Identify the use of all proposed buildings on the plan [501.C.2.b].
3. Several features identified on the provided legend appear to be shown as a solid-black but are not drawn as a solid-black line. Please revise the legend so that the line types shown are consistent with the lines as they are drawn on the plan [501.A.14].
4. Provide the names of adjoining property owners and their respective deeds and, if applicable, subdivision recording reference(s) and lot numbers. The identity of property owners shall reflect ownership as they exist currently or no earlier than one (1) year prior to submittal [501.A.19].
5. Address the requirement to provide elevations of top of grate, bottom of box, invert in & out of all stormwater inlets & manholes shown on all drawing sheets [501.C.10.c & d].
6. Provide spot elevations at all pertinent locations on BMPs (berms, spillways, etc.) as need to provide clarity to the design and ease of construction [501.C.e]Un.
7. Unless a modification is granted, all street profiles shall be drawn at a minimum vertical scale of 1" = 5' (501.C.12)
8. Show the location of all proposed fire hydrants [501.C.13].
9. Show the proposed structure and pipe locations, pipe sizes, slope and type of material, and other information related to the proposed water extension [501.C.13].
10. Provide the location of and description of all existing and proposed survey monuments and markers on the plan [501.C.16].
11. Show the size, location, pavement markings, and signage for any fire lanes on the plans [501.C.17].
12. Provide a typical cross-section for the proposed access drive that shows the entire street width including shoulders, pavement and subbase materials and depths, and crown/cross-slopes of the proposed access driveway [501.C.18].
13. Identify the tan cross-hatched easement that runs parallel to the red "Existing Transmission Line Easement" on the plan [501.C.19].
14. Identify the beneficiary of the existing "Existing Transmission Line Easement" and the unidentified easement on the plan [501.C.19].

15. Provide a completed PADEP Sewage Planning Module [503.A.3].
16. Provide a listing of all local, state, federal, and other agency approvals that will be required for Final Plan approval and construction [503.A.8].
17. Provide a report from the Middlesex Township Municipal Authority confirming that proposed water and sewer designs meet their technical requirements [503.A.9].
18. HRG understands that the Geotechnical report submitted with Phase 1A is intended to cover all phases of development. We ask that the developer confirm this intention. If confirmed, any of our Geotechnical report comments from the Phase 1A plan review apply equally to this review. [503.A.13.a & b].
19. It appears that the limit of disturbance and grading encroaches into the 100-year floodplain near Point of Analysis Q on the Erosion & Sedimentation Control Plans (Sheets C1B 303 & ES1 205). Ensure that the Cumberland County Conservation District has been consulted and provide verification of approval [903.A.8].
20. The following grading inconsistencies, by means of crossing other contour lines or do not completely connect to an existing contour, shall be reconciled [1101]:
 - a. The area northeast of the emergency spillway of Detention Basin R2, along Campus 1 Western Access, on Sheet C1B 301.
21. Provide adequate information, such as contours, contour labels, spot elevations, etc. to ensure that stormwater runoff drains appropriately away from proposed Buildings 1-6, and to the appropriate stormwater facilities, to prevent ponding as the general grading area in the vicinity shows a 437.00 elevation. Additional comments may result when a detailed grading plan is provided for review. [1102.A.1].
22. Provide plan notes to address the following ordinance requirements:
 - a. What measures will be taken during grading operations to prevent erosion or siltation of natural drainageways and what measures for dust control will be exercised [1102.A.5/6].
 - b. What provisions will be made to prevent surface water from damaging the cut face of excavations or the sloping surfaces of fills [1103.B].
 - c. All fill shall be placed and compacted so as to minimize sliding or erosion of the soil [1103.D].
 - d. How will fill placed adjacent to natural watercourse or constructed channels be protected against erosion during periods of flooding [1103.F].
 - e. Existing stream valleys and other wetland areas shall remain as designated open space [1202.C.2].
 - f. The Township Engineer shall be present, unless indicated otherwise, during storm sewer construction to perform material checks and to observe for proper construction. Storm sewer trenches shall not be backfilled and closed without prior approval of the Township Engineer. Failure to adhere to these requirements shall render storm sewer construction defective and shall be removed and replaced at the Applicant's sole expense. Prior to construction, specifications and/or

details (shop drawings) shall be submitted to the Township or the Township Engineer for review and approval so as to ascertain compliance with the approved plans. [1406.A.5/6].

- g. The Township Engineer shall be present, unless indicated otherwise, during construction of stormwater Best Management Practices (BMPs), to perform material checks and to observe for proper construction. Prior to construction, specifications and/or details shall be submitted to the Township for review and approval [1407.B/C].
 - h. In the event that changes to approved plans are required prior to or during the construction phase of the work due to unforeseen field conditions, final utility design, or other similar changes or conflicts encountered during construction, the Township shall be notified immediately so that the proposed changes can be reviewed prior to implementation. Any design changes made without review and approval by the Township shall be considered defective work and shall be subject to removal and reconstruction [1408.A].
- 23. Site grading shall be a financially secured site improvement and shall be included in the construction cost estimate for site improvements required by Article XIII of the SALDO [1104.B].
 - 24. On Sheet C1B 303, the Sheet cut off delineation is shown as "Continue on Sheet C1B 401" instead of "...Sheet C1B 301" [General].
 - 25. Where driveways access a curbed street, the driveway opening shall contain a depressed curb with a minimum of 1.5-inch curb reveal across the required width of the driveway (703.I.4) – ***Applicant has requested a waiver***
 - 26. Provide Intersection Sight Distance information and clear sight triangle information for driveways [703.K.1 and 3]. For driveways accessing Country Club Road, this issue is being reviewed in association with the Phase 1A plan. Provide sight distance and CST information in this plan for locations where site driveways access PA Data Drive.
 - 27. Easements shall be provided for storm drainage facilities, storm water management areas, Best Management Practice (BMP) areas, sanitary sewer and water facilities, natural features areas, access ways, overhead or underground public or private utilities, and other special purpose easements. All easements must connect to a public street in order to provide access to said easement area [704]
 - 28. Sidewalks must be installed along both sides of all new interior streets in all commercial and industrial land developments within the Township unless otherwise waived by the Township. Sidewalks must also be constructed along the side of all exterior streets upon which the land development fronts [707.A.1] – ***Applicant has requested a waiver***
 - 29. Non-residential developments shall dedicate a minimum of ten percent (10%) of gross land area for park or recreation use [710.A.3.b]
 - 30. Site Lighting comments are included in the Zoning review [711]
 - 31. The Middlesex Township Municipal Authority shall have the responsibility to ensure compliance with requirements of the Ordinance that pertain to public water and/or sanitary sewerage facilities [712].

32. Provide design calculations for the proposed retaining wall, prepared and certified by a Professional Engineer in the Commonwealth of Pennsylvania experienced in structural design and geotechnical engineering principles [716.B].
33. Provide a Preliminary Landscape Plan that contains all requirements set forth in Section 719.B.1.a-h [719.B.1.a-h].
34. Ensure that the legend colors match the appropriate ground covers on Sheet C1B 004 (General)

ENVIRONMENTAL IMPACT ASSESSMENT

1. Technical review associated with the Environmental Site Assessment is included with the Phase 1A plan review. We request that the applicant confirm their intent to address the EIA requirements of the overall development (Phase 1A, 1B, 2, and 3) in association with the Phase 1A plan. If confirmed, any of our EIA comments from the Phase 1A plan review apply equally to this review.
2. As Phase 1B will be the first phase of the development with a significant water demand, Middlesex Township has asked that HRG expand our review of the EIA under this phase to include a cursory review of the water and sewer requirements. We have therefore performed a review for consistency with section 718.D.10 and offer the following comments. These comments are intended to be advisory in nature and we recognize that the Middlesex Township Municipal Authority ultimately has jurisdiction over water and sewer service.
 - a. Final design for equalization/attenuation systems is not yet complete. The Applicant should work with the applicable utilities during the design of these systems to ensure potable water allocations and receiving sewer capacity will not be limited by peak flows.
 - b. It is noted that Campus 1, 2, and 3 water planning feasibility and preliminary design was not included in this report; and correspondingly was not reviewed. Clarify when this information will be provided, in light of the stated intent for the submitted EIA to cover all phases of the proposed development.
 - c. Well 2 design, permitting and construction shall be completed (noted to be June 2027) before this project should be connected to the public potable water systems.
 - d. This Project team should coordinate not only with the Well 2 project being completed by Middlesex Township Municipal Authority but also the neighboring potable water systems owned by Pennsylvania American Water and South Middleton Township, coordinating any impacts the project's 0.4MGD request will have on the referenced interconnect agreement to ensure adequate redundancy for existing customers.
 - e. This Project team should work with MTMA as applicable to identify the need for additional potable water storage as discussed on PDF Page 732.
 - f. It is noted for both water and wastewater that the proposed project is taking all available additional capacity not currently identified by "Future Development Allocations". All receiving sanitary sewer systems and providing potable water systems should give approvals that their Future Development Allocations are adequate to provide capacity to planned development, until future capital projects can increase capacity as required.

- g. Design of sewer discharge equalization system should be coordinated in detail with receiving sewer systems, and the discharges hydraulically modelled from this project to Carlisle Borough Authority's WWTP. Including both gravity and pumped conveyance systems.
- h. The Project should be approved under the current Industrial Pretreatment Program of the Carlisle Borough Sewer Authority, with adherence to their latest Headworks analysis approved by PADEP/EPA. With a permit being issued from the Borough Authority. As required, Cooling Water Blowdown water should be treated by a pretreatment industrial wastewater treatment system. With particular care given to the mass loadings of TDS to the Carlisle Borough Authority WWTP.
- i. As noted on PDF Page 740, the proposed Project's available cooling water will decrease through each phase of construction. Confirm the proposed Project will ensure that water usage, storage, and water reuse systems will be designed to not exceed the proposed allocation provided by MTMA.
- j. It is noted that water will be consumed at a rate that will trigger the need for an SRBC Consumptive Use Permit Application. The Applicant should coordinate with MTMA and SRBC for the application of that permit.
- k. The Applicant shall coordinate with SRBC, PADEP, and any other applicable regulatory or planning agencies for approvals

STORMWATER MANAGEMENT

1. Demonstrate that an NPDES permit has been secured for the proposed site disturbance. [109]
2. Demonstrate that any required PADEP permits or permits required by any other regulatory agencies have been secured. Provide copy of submitted documents for reference [103.J & 301.Q]
3. Provide a drainage easement with metes and bounds along the existing watercourses. Alternatively, the drainage easement may follow the same lines as the 50' Township riparian buffer [301.P].
4. Provide a min. 20' wide drainage easement with metes and bounds along all stormwater management facilities, channels and inlets [303.J.12 & 303.K.12].
5. Please ensure that all inlet labels are brought to the front of the drawing on the Grading & Stormwater Plan to increase legibility of the drawings [General].
6. Storm structures shall be placed such that no more than three hundred (300) feet of storm pipe is proposed without a structure for access. There are several storm sewer runs that contain more than 300 feet of pipe. Revise accordingly [303.K.7].
7. Ensure all storm structures on the Grading & Stormwater Plan are labeled. An example is the Basin K Manifold storm run and the driveway culvert under Campus 1 Eastern Access [302.A.10].
8. Clarify if curb is proposed around the Campus 1 access drives. The construction details provide a curb detail, however, the plan view and grading do not appear to include curb [302.A.10].
9. The grading & Stormwater Plan should be revised to include detailed contours, spot shots and/or flow arrows around the Campus 1 access drives to depict how stormwater will flow throughout the site and be captured by the proposed conveyance system. Currently the entirety of the Campus is shown at a

flat elevation of 437.00' which makes it unclear how the drainage system will capture runoff without bypassing the drainage system or ponding on the site [302.A.10].

10. Clarify if there are roof drains on each building and depict the location and how they tie into the proposed storm sewer system [302.A.10].
11. Assess the need to include conveyance facilities, such as drainage swales, along the grass perimeter between the access drives and the double security fence to ensure drainage is directed to the appropriate stormwater management facilities. Currently, the grass area is proposed to be at a flat elevation of 437.00' which may result in the overland flow to bypass the stormwater management facilities [302.A.10].
12. Confirm that there is sufficient cover over the pipes for storm runs I-1.3 to I-1.6 [302.A.12].
13. Inlet I-1.5 has an invert out higher than the invert in. Revise accordingly [302.A.12].
14. Provide storm profiles for the following storm sewer runs [302.A.12]:
 - a. FES K1-C.4 to manifold
 - b. FES K1-C.3 to manifold
 - c. FES K1-C.2 to manifold
 - d. FES K1-C.1 to manifold
 - e. The driveway culvert under Campus 1 Eastern Access
15. Ensure that all soils are labeled on each plan sheet so that the soils can be easily identified without viewing a separate plan sheet [302.A.7].
16. Revise the limit of disturbance on the Grading & Stormwater Plan sheets to only depict what will be disturbed for this phase and not the overall disturbance of the total project [302.A.18].
17. Ensure all proposed contour lines tie into the Phase IA proposed contours where applicable. Also ensure the grading for Campus 1 Eastern Access is shown to tie into PA Data Dr. [302.A.18].
18. Provide the operation and maintenance (O&M) plan on the Land Development Plans. The O&M plan should clearly explain who is responsible, how the proposed facilities operate, how they shall be maintained and any other items as listed in 501.C of the Stormwater Management Ordinance [302.F & 501.C].
19. The O&M Plan should contain a note, in a form satisfactory to the Township Solicitor, designating the entity responsible for operation and maintenance of the stormwater management facilities consistent with the approved O&M Plan, and in the event that the responsible person or entity fails to do so, granting to Middlesex Township the right but not the duty to enter upon the premises to repair or restore said facilities, to charge and assess the costs thereof to the owner, and to enforce said charges and assessments by lien upon the property [501.B.1.a].
20. Provide protection from excess compaction around the proposed stormwater management facilities to promote the possibility of infiltration as much as feasible. The Engineer provided a note on Sheet C1B

002 that the Contractor shall provide protection around the stormwater facilities. These controls should be shown on the erosion control plan at a minimum [303.H.20].

21. The minimum inside side slopes for a detention basin is 4:1 and the bottom of the basin shall be sloped at a minimum of 2% [303.J.3]. **A waiver has been requested for this requirement.**
22. Pipe inverts into a detention basin shall be a minimum of six (6) inches above the bottom of the basin. Revise accordingly. [303.J.4].
23. Provide a childproof non-clogging trash rack on all outlet structure openings exceeding twelve (12) inches in diameter (Basin K1) [303.J.7.e].
24. A sediment forebay with a hardened bottom shall be provided at each inlet into detention basins [303.J.11].
25. Specify on the storm profiles where a non-standard inlet box is required. For example, Inlet I-4.2 is not constructable utilizing a standard box [302.A.12 & 302.A.13].
26. Provide documentation that all infiltration practices or alternative volume mitigation measures such as MRC Cells move all surface ponding sub surface within 48 hours. [303.H.17]. **A modification has been requested for this requirement to allow a dewatering time of 72 hours which is consistent with PADEP standards.**
27. Infiltration of surface water is to be the primary mechanism for meeting stormwater management requirements [303.B.2]. **A waiver has been requested to utilize MRC cells as an alternative approach to meeting volume and water quality requirements.**
28. The Landscaping Plan shall be signed and sealed by a professional landscape architect or a landscape professional with adequate experience in selecting plantings for special or unique uses [302.L].
29. Ensure that the outlet pipe slope and length within the PCSM Report for the routing calculations are consistent with what is shown on the Land Development Plan profiles and details [302.A.12].
30. Ensure the FES-F1 to OS-F1 profile, FES-K1 to OS-K1 profile and FES-R1 to OS-R1 profile are consistent with the MRC/Infiltration Basin detail, Basin Outlet Structure details, and the routing calculations [302.A.12].
31. Revise the Basin K MRC Cell Profile to specify that the rate basin bottom elevation is at 418.00' rather than 417.50' [302.A.13].
32. Revise the Invert Out elevations on the MRC Cell Outlet Structure detail to be consistent with the profiles as it appears the MRC design has the outlet pipe located lower than the underdrain invert for all MRC cells [302.A.13].
33. Revise the Basin R1 Flow Splitter Structure FS-R10 detail to be consistent with the profile. According to the profiles, all of the pipes enter the structure are at elevation 415.00' [302.A.13].
34. Depict the Infiltration Basin Forebay in plan view [302.A.10].
35. Provide riprap apron details and calculations for the following structures: [302.A.13 & 302.D]
 - a. K1-FES 1

- b. FES K1-C.1 to FES K1-C.5 (for both basins)
 - c. R1-FES 1 to R1-FES 3
36. The grading for Detention Basin R1 proposes a small portion of fill within the regulated 100-year floodplain (see Sheet C1B 303). As the Pennsylvania Natural Diversity Index (PNDI) search found potential impacts within the floodplain, the grading should be revised so that there is no fill and disturbance proposed within the regulated 100-year floodplain [301.T].
38. Provide Clarification on accounting for Post Runoff Condition Values. Table 4.1 proposed values for POA F, L, and R do not equal values in Table 3.2. {303.D}
39. The identified areas analyzed for peak rate in the existing condition (139.62 acres) and the proposed condition (134.59 acres) do not align. This total is based on summing the provided totals on sheet Post DA-1B-1 and Pre DA-1B-1. The analysis should account for the rerouting of all existing drainage areas. In cases where area is being transferred to a different phase the receiving POA needs reported on this phase. Final review of PCSM report tables, TCs, Hydroflow calculations, and peak rate compliance is dependent on the correction of this discrepancy. [303.D.1]
40. Please provide additional drainages areas and/or clarification on drainage areas as detailed with the comments below. {303.D}
- a. Provide clarification on the drainage area divide between basin R1 and R2. Drainage, proposed contours, and proposed drainage does not support drainage divide.
 - b. Provide confirmation that post drainage area to POA D remains unchanged from proposed POA D drainage area in Phase 1A. Grading for BMP ID 7 appears to impact footprint.
 - c. Provide additional detail to verify POI K, F, and R Drainage areas within the site. Provided mapping does not include contours or proposed drainage systems. This comment extends to post drainage area map and inlet drainage area map
 - d. Provide Phase IA drainage areas and features on the existing drainage area map as these features are indicated in the phasing plan to be constructed prior to the beginning of Phase 1B. Providing this detail will provide documentation to address peak rate inconsistencies highlighted in earlier comments.
41. The provided Volume calculations indicate 108.68 acres in predevelopment condition and 115.27 areas in proposed conditions. In the case that area is being transferred between phases the receiving or losing POA should be included in this Phase analysis. Final review of PCSM report tables, Volume Calculation Sheets, and Volume mitigation is dependent on the correction of this discrepancy. [303.G]
42. Provide clarification of review status of MRC designs with PaDEP. Some conditions in the spreadsheet appear to be out of compliance with DEP guidance. DEP cautions against marking approved spreadsheets in correspondence and indicates that the designs comply with the "intent" of the SCM but states it does not constitute an approval of the PCSM plan. [303.D.1]
43. Provide additional detail on the layout and hydraulic function of each individual MRC. [302.G]
- a. Provide plan view layout of MRC underdrains and cleanouts on PCSM plan and Utility plan
 - b. Provide quantification of planting totals for MRC plantings as described on sheet C1B 805

- c. Provide clarification on modelling of flow split structures for MRCs. Current DEP guidance requires the diversion of all storms greater than the two year storm with less than a .5 ft increase in ponding depth in the MRC cells.

Basin R1/R2

- d. Provide Stage Storage back up for MRC Bioretention Cell R1/R2. Volume data is based on user input without back up.
- e. Provide clarification on peak rate routing between MRC cells and Peak Rate basins, R1 appears to account for MRC volume into and R2 does not. Only 1 basin routing weighted CN sheet is provided when 3 separate weighted CNs are provided in the routing diagram and computations.
- f. Provide offsite discharge analysis from peak rate basin outfall using current DEP forms. This is part of previous comment on NPDES submission and approval.

Basin K

- g. Provide stage storage back up for the MRC Bioretention cells. Volume data is based on user input without back up.
- h. Provide clarification on peak rate routing between MRC cells and Basin. Post detained appears to route the entire volume through the forebay and cells without accounting for the volume of forebay and MRC cells. Post detained to MRC Cell does not have weighted CN backup provided and is not routed to POA.
- i. Provide spillway stability calculations for K1 forebay to K1 Peak Rate detention basin.
- j. Provide hydraulic routing documentation that MRC forebays do not require emergency spillways or provide emergency spillway calculations.
- k. Provide offsite discharge analysis from peak rate basin outfall using current DEP forms. This is part of previous comment on NPDES submission and approval.

Basin F

- l. Clarify inconsistency in stage storage scaled basin bottom on the proposed drainage area map is approximately 53,800 sf and stage storage is 50,700.
- m. Provide offsite discharge analysis from peak rate basin outfall using current DEP forms. This is part of previous comment on NPDES submission and approval.
- n. Provide forebay details and plan view mapping in alignment with Phase 1A comments.

44. Provide additional detail and clarification on Tc calcs as described in the following comments: (303.D.1)

- a. Provide indications of where flow path segments transition on Pre and Post DA maps.
- b. Provide supporting calculations for POA K detained to SCM. Provided reports include predevelopment and post un detained. The post detained lists a Tc of 15 minutes, requiring documentation.

- c. Confirm that all Tcs related to detained and un detained areas in R1 and R2 are included.
45. The following deficiencies were noted in the O&M plan contained in the PCSM report. Note deficiencies shall be corrected in the O&M plan in the PCSM report and in the copy of the plan added to the Land Development record plans.
- a. Provide dewatering time for Infiltration Basin and MRC Basin. [501.C.3]
 - b. Include the requirement to submit report summarizing findings of inspections to Middlesex Township within thirty (30) days of inspection for Infiltration Basin and MRC Basin BMPs [501.D]
 - c. Define inspection and reporting frequency for all MRC orifices and low slope pipes. These frequencies should not be defined as an “or” since it will lead to confusion. [501.D]
 - d. Quantify mowing frequency for all BMPs/SCMs based on specified plantings. (example native seed mixtures shall be mowed annually between November and March) [501.C.2 and 501.C.4]
 - e. Provide O&M requirements specific to the infiltration basin in POA F. [501.C]
 - f. Clarify which O&M section applies to each BMP/SCM utilizing naming conventions similar to labels on record plan or supplemental O&M exhibit. [501.C.3]
 - g. Provide clarification which BMP/SCMs will have regulated O&M since they are required for regulatory compliance and which ones are conveyance. [501.C]
46. The proposed design utilizes non-infiltration BMPs/SCMs in a non-karst area. Please provide documentation in the PCSM Report and Appendices that the standard set forth in 303.G.1b is satisfied for all areas where infiltration is proposed. This may include the volume used to satisfy state requirements [303.H.2]
47. Provide locations of soil test pits, soil profiles, and infiltration tests on either the “Phase 1B Overall Stormwater and Grading Plan” and/or the PCSM Report/Stormwater Soils and Infiltration Investigation Report. This documentation should demonstrate compliance with section 303.H.12, including, but not limited to, the number of infiltration test pits and soil profiles located at the bottom elevation of each proposed BMP/SCM.
48. Provide proposed conditions ground cover map delineated by shading, hatching, color coding, etc. which includes percentage of existing cover on the map [302.A.9]
49. Provide existing conditions ground cover map delineated by shading, hatching, color coding, etc. which includes percentage of existing cover on the map [302.A.4]
50. In BMPs/SCMs where either amended soils are to be placed or infiltration is anticipated to occur add water quality pretreatment (forebays or other applicable methods) at points where concentrated discharges enter the basin. [303.H.7]

TRAFFIC

1. The Township’s Traffic Engineer (Michael Baker) has reviewed and recommends acceptance of the project’s Traffic Impact Study, third revision.
2. Provide an estimate of financial security required to construct a right-hand turn lane from westbound Route 11 (Harrisburg Pike) to north-bound Country Club Road. Include in this estimate the cost of

additional ROW, ADA ramps, buttons, and signals as directed by the Township's Traffic Engineer.
(Michael Baker)

COUNTRY CLUB ROADWAY IMPROVEMENTS

1. Technical review associated with the Country Club Road improvements is included with the Phase 1A plan review. We request that the applicant confirm their intent to address required Country Club Roadway improvements in association with the Phase 1A plan. If confirmed, we have no additional Country Club Roadway comments specific to Phase 1B.

ITEMS TO BE INCLUDED IN THE DEVELOPER'S AGREEMENT

1. Include a Stormwater Management Operation and Maintenance (SWM O&M) Agreement.
2. Demonstrate that a deed restriction has been established to require SWM O&M by any future owners of the affected properties.
3. Establish an Operation and Maintenance agreement for PA Data Drive.
4. Establish financial security for offsite traffic improvements, namely a right-hand turn lane from westbound Route 11 onto northbound Country Club Road.
5. Establish financial security for on-site improvements. Provide a cost estimate of these improvements for review [Section 1301].

ITEMS TO BE ADDRESSED IN THE FINAL LAND DEVELOPMENT PLAN

1. If/when the project advances to a Final Land Development plan, provide a signed and executed O&M agreement. The O&M agreement shall be recorded within fifteen (15) days of approval of the O&M Plan by the Middlesex Township [502].
2. If/when the project advances to a Final Land Development plan, the deed of each lot shall contain a covenant binding the grantee and all successors title and interest designating the responsibility for operation and maintenance of the stormwater management facilities. Reference to this covenant shall be noted on the cover of the Plans [501.B.1.a].
3. Prior to construction of storm sewer facilities, specifications and/or details shall be submitted to the Township for review and approval, including but not limited to, pipes, inlets and tops, catch basins, head and end walls, stone bedding, and backfill material, as applicable [1406.A.6].
4. Provide a Final Landscape Plan (719.B.2 and 3)

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This review is based solely on the documents referenced above and does not relieve the design professional of any responsibility, nor does it imply any design responsibility by Herbert, Rowland & Grubic, Inc. HRG reserves the right to make additional comments in the future based on newly-supplied or revised information as provided by the applicant or their representative(s).

Sincerely,

Herbert, Rowland & Grubic, Inc.

A handwritten signature in blue ink, appearing to read "J. Michael Hess".

J. Michael Hess, PE
Team Leader