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PHASE 1A LAND DEVELOPMENT PLAN REVIEW LETTER #3

MIDDLESEX TOWNSHIP, CUMBERLAND COUNTY, PA

Attn: Mr. Bud Grove, Township Engineer

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

Middlesex Twp Plan No. TPF 25-17

January 23, 2026

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

Submission:	Dated:	Last Revised:
Plan Sheets 1-64 of 64 [Plan]	8/18/2025	01/09/2026
Post Construction Stormwater Management Report [PCSM Report]	8/17/2025	01/09/2026
PCSM Plan Set	10/17/2025	01/07/2026
E&S Plan Set	01/07/2026	--
Country Club Road Plan Set	8/18/2025	12/23/2025
Sight Distance Exhibits	12/22/2025	--
SWM Infiltration Report	10/24/2025	
Environmental Impact Assessment	August 2025	1/9/2026
Noise Study	01/08/2026	--
Rate Payer Study	December 2025	--
Comment Response Letter	01/09/2026	--

The applicant has submitted the following requests for relief:

Requested Waiver[s]:	Ordinance Section:
Plan Sheet Scale > 1" = 50 ft	501.A.2
Location Map Scale > 1" = 1,000'	501.A.6
Curb and Sidewalk along Country Club Road	703.A.10
Depressed Curb at Driveway Entrance	703.I.4
Grading Within a Street Right of Way	703.M
Street Horizontal Curve Radius	703.H.2
Street Width	703.C.1
Deferral of Sidewalk Requirements	707
Plan Scale for Maps Within the EIA	718.D.3.A, 718.D.4.B, 718.D.4.C, 718.D.4.D
Detention Basin Slopes	303.J.3
Swale Grades	303.K.9
Dewatering	303.H.17
Infiltration of Stormwater	303.B.2

We offer the following comments [* - Indicates comments not addressed from previous review letters]:

ZONING

1. Submit an interconnection agreement from the electric service provider [Ord 3-2025 24.08] (10/8/25). 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 (12/17/25). *The applicant submitted a Rate Payer Study noting that Amazon data centers are not being subsidized by existing rate payers and that they either have a neutral impact or potential to generate ratepayer benefits. The study is based on four (4) utility case studies in CA, OR, VA and MS. The applicant should apply the study to the PPL territory and discuss what category this project falls under (a) revenues and costs being equal, (b) costs exceeding revenues and (c) revenue exceeding costs. The PPL letter referenced above notes that system upgrades will be required. The applicant should discuss how the upgrades are being paid for. Other considerations may include (a) demand response (DR) programs – reducing load during peak events, (b) on-site generation, (c) battery energy storage, (d) thermal load shifting and (e) geographic load shifting. The interconnect agreement shall be provided once available.*

2. Soundproofing of mechanical equipment shall be provided on the exterior of the lot abutting a lot with an existing residential use. This requirement shall be noted within the Zoning Regulations, sheet C1A 002. Alternatively, provide confirmation that the noise level will not exceed 70 dBA, as measured at the property line [24.09]. [Ord 3-2025 24.04.B.4] (10/8/25). Applicant is preparing a noise study and believes 70 dbA at the property line will not be exceeded. The noise study should assess the full development noise level, not just the individual phase noise level. This noise study will be reviewed once received (12/17/25). *A Phase 1A noise study was provided, the conclusions note that 70dBA is not exceeded at the property line. HRG has reviewed the noise study and does not have any detailed technical comments. However, as previously noted, the noise study shall assess the full development noise level, not just the individual phase noise level as the noise from multiple phases may be cumulative. If desired, a separate noise study can be submitted for each phase which considers the subject phase and all phases which came before it. If this is the applicant's intent, please advise.*

SUBDIVISION AND LAND DEVELOPMENT

1. All plan sheets shall not exceed a scale of 1":50' [501.A.2] **Applicant is requesting a waiver of this requirement.**
2. Provide a Table of Site Data that contains all information required by this section [501.A.15]* *Complete the Source of Title information following recording of the subdivision plan.*
3. Show all hydrant locations, structure and pipe locations, pipe sizes, slope and type of material, and other related information for the proposed water extension.* *Applicant has indicated that proposed water extension design information will be provided once made available by their subconsultant* [501.C.13]
4. Provide a completed PADEP Sewage Planning Module [503.A.3]* *Provide a copy of the approved Non-building waiver once received.*
5. Report from Authority confirming adequate proposed water and sewer designs meet technical requirements [503.A.9]* *Provide approval of the watermain design once received.*
6. Ensure the plan complies with Section 703.I for any proposed driveways [703.I] **Applicant is requesting a waiver of Section 703.I.4 to allow flared curbs.**
7. Ensure that the design complies with Section 703.M regarding Designs within Street Right-of-Way [703.M] **Applicant is requesting a waiver of this requirement.**
8. 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 is requesting a waiver of this requirement.**
9. Non-residential developments shall dedicate a minimum of ten percent [10%] of gross land area for park or recreation use. The developer is electing to provide a fee-in-lieu of dedication, per Section 710.E. Provide a calculation for the proposed fee-in-lieu. [710.A.3.b]
10. Roadway contours appear to need reviewed on Sheet C1A 507. At the substation southern access drive centerline, proposed grades on the plan view and profile view do not provide a smooth vertical curve [General].
11. *Indicate how disturbance to perennial streams including stream riparian buffers, natural drainageways, and drainage swales is avoided. Provide evidence of PADEP approval for any permits which are required for the land development. *HRG acknowledges the applicant has indicated that PADEP approvals will be provided as received, and that some approvals may defer to Final Land Development due to review lead times* [1202.C.1.a].

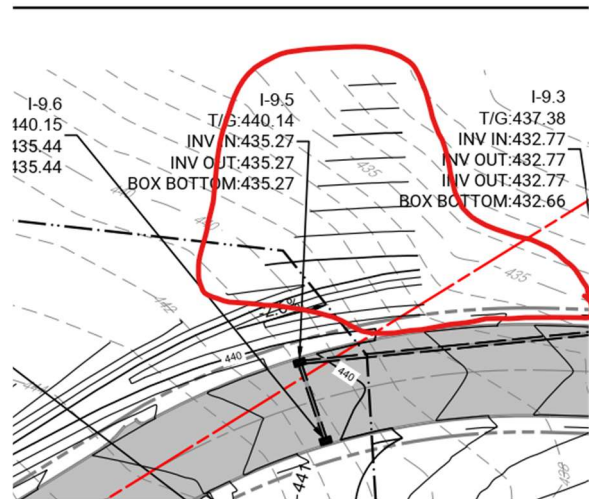
ENVIRONMENTAL IMPACT ASSESSMENT (SUBSECTIONS OF SALDO)

1. *Provide a Geological Plan at a scale of no more than one inch to one-hundred feet (1" = 100'). (Note the provided plan scale is 1" = 500'). **A waiver has been requested for this requirement** [§718.D.4.a].
2. Provide a Site Development Plan at a scale of not more than one inch to one-hundred feet (1" = 100'). **A waiver has been requested for this requirement** [718.D.3.a].
3. *Provide plans and elevations depicting the proposed size, square footage, height, number of rooms (where applicable) of building and/or other structures. *HRG acknowledges the engineer's response that due to the proprietary and secure nature of the proposed buildings, internal specifications of building and room layouts are not provided at this time and will be circulated to the township upon building permit and/or Final Land Development application stage* [718.D.3.b]. If the applicant does not wish to disclose this information at the present time, a waiver should be requested.
4. *Provide a Topographical Plan at a scale of no more than one inch to one-hundred feet (1" = 100'). (Note the provided plan scale is 1" = 500') **A waiver has been requested for this requirement** [718.D.4.b].
5. *Provide Soil Plan at a scale of no more than one inch to one-hundred feet (1" = 100'). (Note the provided plan scale is 1" = 500'.) **A waiver has been requested for this requirement** [718.D.4.c].
6. *Provide the Hydrogeological Plan and Wetlands Exhibit at a scale of no more than one inch to one-hundred feet (1" = 100'). (Note the provided plan scales are 1" = 500'.) **A waiver has been requested for this requirement** [718.D.4.d].
7. Remove draft PNDI (dated 1/30/2024), Page 94, and replace with most recent (dated 10/30/2025) and associated clearance letters [718.D.5]
8. Remove outdated DCNR clearance letter dated May 30, 2025 (Page 355) and replace with most recent DCNR clearance letter dated Nov 5, 2025 [718.D.5]
9. Remove outdated PNDI (dated 6/12/2024), Page 391, and replace with most recent (dated 10/30/2025) [718.D.5]
10. Include PHMC above ground resources determination letter [718.D.7].
11. Include correspondence from PHMC accepting the proposed contribution to HBFF as mitigation for the potential adverse effect to properties eligible for the National Register associated with the project. [718.D.7].
12. Include PHMC letter requesting more information about the potential for the project to visually impact the Appalachian Trail [718.D.7].
13. Include PHMC correspondence related to SWCA Project Bolt Appalachian Trail Visual Analysis Memo which recommends the proposed project will result in No Adverse Effect to the Appalachian Trail [718.D.7].

STORMWATER MANAGEMENT

1. Demonstrate that an NPDES permit has been secured for the proposed site disturbance. [109]
2. Demonstrate that a Blasting Activity Permit has been secured for any blasting work associated with the proposed earthmoving activities. [109]
3. Provide proof of NPDES and PADEP permit and any other required regulatory permit submission. Provide copy of submitted documents for reference [103.J & 301.Q]*

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].* The applicant has indicated that they will provide the easements on the final plan. This must be shown on the preliminary plan in accordance with the Subdivision and Land Development Ordinance Section 501.C.19.
5. Ensure all proposed contour lines tie into existing contour lines and all proposed contours are shown. For example, the proposed contour lines at the western and northern access do not appear to be complete. [302.A.18].* The proposed contour lines still do not appear to tie into existing contours lines along the north side on PA Data Drive and at the two driveways to Phase IB and 2. See image to the right for example.



6. 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].* The Applicant's engineer states that a comprehensive and standalone O&M Plan will be developed during the Final Plan submission. The Subdivision and Land Development Ordinance Section 503.A.7 requires that the SWMP meets the Township's Stormwater Management Ordinance for preliminary plan requirements. As such, the O&M Plan must be submitted and approved with the preliminary plan.
7. 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].* The Engineer states that a comprehensive and standalone O&M Plan will be developed during the Final Plan submission. The Subdivision and Land Development Ordinance Section 503.A.7 requires that the SWMP meets the Township's Stormwater Management Ordinance for preliminary plan requirements. As such, the O&M Plan must be submitted and approved with the preliminary plan.
8. Provide protection from excess compaction around the proposed stormwater management facilities to promote the possibility of infiltration as much as feasible [303.H.20].* The E&S plan should depict the proposed orange construction fencing around any stormwater management facility not proposed to be a sediment basin during Phase I of the construction sequence (Basins A3 and D1) so that heavy equipment does not traverse over the infiltration facilities during the general bulk earthwork phases.
9. The minimum side slopes for all swales is 4:1. Revise accordingly [303.H.24.e].* **A waiver has been requested for this requirement.**
10. There appear to be two culverts which convey existing channel 06 and a section of USACE jurisdictional wetlands under proposed PA Data Drive. The proposed culverts need to have separate profiles on the plans, and calculations provided for the sizing of the culverts. Confirm that sufficient cover is provided between the wetland culvert and the storm sewer system in the roadway. Additionally, a note should be called out at each crossing identifying that a PADEP permit is necessary. Once the permits are received the callouts should be revised to reference the permit number [301.Q & 302.A.12].* Provide profiles of the two (2) culvert crossings on the plan.

11. 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%. **A waiver has been requested for this requirement [303.J.3].**
12. The minimum longitudinal slope of a swale is 2%. **A waiver has been requested for this requirement [303.K.9]**
13. Pipe inverts into a detention basin shall be a minimum of six (6) inches above the bottom of the basin. Revise accordingly or request a waiver [303.J.4].* The discharge pipes from the MRC cells into the downstream detention basin do not appear to meet this requirement. Revise the MRC Cell Profiles on the MRC Sections (Sheet C1A 520) appropriately to list the invert outs.
14. The MRC Cell structure labels on the Grading & Stormwater Plan (Sheet C1 A3) provide T/G elevation and invert elevations which are inconsistent with the MRC Cell Out Structure details. It is recommended to remove the T/G and Invert elevations and label the structures similarly to the other MRC cells [302.A.12].
15. A sediment forebay with a hardened bottom shall be provided at each inlet into detention basins [303.J.11].* The Applicant proposes sediment forebays for Infiltration Basins A3 and D1 and notes that the MRC cells act as forebays for the MRC basins. This is acceptable; however, as discussed in our January coordination call additional pre-treatment SCMs upstream of the MRC Basins should be provided to mitigate for the lack of a hardened bottom. The Engineer should include a statement within the PCSM Report justifying the type of pre-treatment SCM and the quantity utilized (as applicable).
16. Provide storm profiles for the following storm sewer runs [302.A.12]:
 - a. I-5.13 to I-5.14
 - b. I-9.6 to I-9.5
 - c. I-8.8 to I-8.7
 - d. I-6.2 to I-6.1
 - e. FES-V5.2 to FS-V5.2
17. Ensure the profiles and structure labels identify the invert out and invert in elevations correctly. For example, inlets I-17.7, I-17.5, I-17.3, I-16.4, I-9.3, I-9.1, I-8.1, I-5.5, I-5.1 and I-5.3 have two invert outs and one invert in. The Engineer has stated, in response to comment #31 on the previous comment letter, that the labels will be modified as part of the final plan. These labels need to be corrected prior to preliminary plan approval so that the intent of the storm sewer system is clear [302.A.12].
18. Ensure the profiles show the entirety of the proposed grade. See FES-7 to I-7.2 Profile, FES-13.3 to I-13.5 Profile and EW-19.1 to EW-19.2 Profile for example [302.A.12].* EW-19.1 to EW-19.2 does not show the proposed grade on the profile. The remaining profiles have been addressed.
19. EW-20.1 to EW-20.4 does not show the proposed grade at the end of EW-20.1. Depict the proposed grade and extent the profile to show how it will be graded to tie-into the downstream cross pipe EW-19.2 to EW-19.1 [302.A.12].
20. Ensure the storm profiles and storm plan labels are consistent with the MRC Basin Flow Splitter details and elevations [302.A.12].* The flow splitter structures are still inconsistent between the details and profiles. Also, confirm that a 4'x4' box is constructable for Flow Splitter Structure FS-R2.
21. Confirm that there is sufficient cover over the pipes for storm runs I-17.1 to I-17.10, EW-20.1 to EW-20.4 and I-38.1 to EW-38 under PA Data Drive and EW-22.2 to EW-22.1 under the driveway Entrance No. 2 [302.A.12].* Storm runs I-17.1 to I-17.10 and EW-38 to I-38.1 still do not appear to show sufficient cover over the pipes with some locations showing less than one foot of cover to proposed grade.

22. Storm profile FES-17.2 to I-17.10 depicts the main line storm pipe being higher than the cross pipes. Revise accordingly. This will also resolve the potential cover issues over this storm run noted in the comment above [302.A.12].
23. Outlet Structure OS-40 has the bottom of the box located above the bottom of the basin. Revise the profile and Basin A3 Outlet Structure detail to clearly depict the intent of the outlet structure and how it will be constructed. Additionally, ensure all elevation are consistent between the profile and detail [302.A.12 & 302.A.13].* The Engineer states that the intent is for the outlet structure to be located within the berm of the basin, however, it is not clear how the 3" primary rate control orifice will function as it is proposed to be located within the berm and will be buried ~2'. It appears that the outlet structure needs to be moved towards the bottom of the infiltration area (435.00' contour line) or the Basin A3 grading be revised to show the 435.00' contour line around the bottom of the box. It is noted that the elevations are now consistent between the plan, profiles, details, and report.
24. Similar to the comment above, Outlet Structure OS-35 appears to be located within the side slopes of the basin which does not allow the function of the 8" primary rate control orifice. Also, confirm if the retaining wall is intended to be utilized as the endwall of the outlet pipe or if there is a separate endwall as depicted on the plans 302.A.12 & 302.A.13].
25. The Detention Basin R-2 outlet structure has a T/G elevation of 442.25' and an outlet pipe invert of 436.73' whereas the PCSM Report has the T/G elevation at 437.75' and the outlet pipe invert at 436.00'. Additionally, ensure the storm profile for OS-28 to FES-28 is also consistent [302.A.12].* The profile lists the T/G elevation at 439.30' whereas the PCSM Report and detail lists it at 437.75'. Revise accordingly.
26. Ensure the storm profile for OS-30 to FES-30 and OS-29 to FES-29 is consistent between the Basin C1 Outlet Structure detail and Basin D1 Outlet Structure detail respectively and the routing calculations in regard to inverts and pipe slopes [302.A.12 & 302.A.13].* The Invert Out elevation for OS-C1.4 is inconsistent between the profiles and details. It is noted that the elevations for Basin D1 are now consistent between the plans, profiles, details, and report.
27. Revise the T/G elevation and outlet pipe invert for OS-18.5 to be consistent between the Basin V5 outlet structure details, profiles, and PCSM Report [302.A.12].
28. Ensure all stormwater basins / MRC facilities have sufficient contour line labels depicted on the Grading & Stormwater Plan [302.A.6].
29. Provide a pipe slope and size label for the outlet pipes on the MRC Cell Profiles, alternatively, individual storm profiles can be provided for each storm run [302.A.12].
30. 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 Plans [302.A.12].* The slope for Basin C1 is inconsistent between the PCSM Report and the FES-30 to OS-C1.4 profile.
31. Provide riprap apron details and calculations for WW-4 and WW-5 [302.A.13 & 302.D].
32. Ensure the pipe size for FES-17.2, FES-32.1, FES-34 and FES-21.2 are consistent between the profiles, riprap details and riprap calculations [302.A.12 & 302.D].* FES-32.1 FES-C1.1, FES-C1.2, FES-C1.3, FES-R2.1, FES-R2.2, FES-21.2, FES-17.2, FES-V5.1, FES-V5.2 are not consistent between the profiles, riprap details, and riprap calculations.
33. 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]* The Engineer proposes a forebay that is 2' deep within the bottom of each infiltration area. There is significant concern that this forebay design will cause water to sit within the forebay area and not dewater. As discussed during our January coordination meeting, the Engineer should revise the forebay design such that the bottom elevation of the forebay is at same elevation as the infiltration surface. Please note that the total volume of the forebay required is 10% of the permanent pool (volume below the lowest orifice) not the entire volume of the infiltration basin.

34. The storm sewer run from FES-4 to EW-10.1 (inflow to Infiltration Basin A3) is proposed at a 0% slope. It is highly discouraged to provide a discharge pipe from the storm sewer system to the Infiltration Basin at less than minimum slope. Revising the outlet pipe slope between basins to a minimum of 0.5% will improve hydraulic performance, reduce maintenance concerns, and provide consistency with standard engineering design principles. Please revise the plans accordingly or provide justification demonstrating that the proposed slope will achieve equivalent self-cleansing performance and long-term reliability [General].
35. All basins are labelled as wet ponds/retention basins in the PaDEP spreadsheets. Details for the basins have a lowest orifice above the amended soil level. The SWM Ordinance defines Retention/ Wet Ponds as an impoundment designed to maintain a permanent pool of water standing longer than 48 hrs. Retention basins/wet ponds are prohibited in the Township. [303.I]* **A waiver has been requested allowing a dewatering time of 72 hours rather than 48 hours. If approved, then this comment is no longer applicable.**
36. Provide documentation that all infiltration practices or alternative volume mitigation measures such as evapotranspiration move all surface ponding sub surface within 48 hours. [303.H.17].* **A waiver has been requested for this requirement. If approved, then this comment is no longer applicable.**
37. 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].*
38. Clarify if the intent of the Post Temporary Basin V and confirm if this basin will be converted to a stormwater basin or if it will be removed as part of a later phase [General].
39. It is noted that submission #3 has provided additional information requested in plan reviews 1 and 2. This information enables a detailed review of the PCSM Report and all accompanying calculations. The following comments are provided for the miscellaneous calculations (stormsewers, channels, emergency spillways, etc.):
- Revise the pipe slope on the Anti-Seep Collar calculations for Basins A1, C1, R2 and V5 to be consistent with the Land Development Plans [302.A.12].
 - Revise the spillway calculations for V5 to be consistent with elevations depicted on the Land Development Plans. Also, confirm that the Q100 peak flow is correct [302.D].
 - Provide the Channel 2 through Channel 6 and Channel 8 through Channel 12 drainage areas on the Inlet Drainage Area Map or provide a separate Channel Drainage Area Map [302.A.17].
 - Revise the Channel 13 calculations to include the drainage from the upstream Channel 1 [302.D].
 - Confirm that the Channel depth for Channel 2 is correct as the detail and calculations show a 5 foot depth but the grading appears to be less than 2 feet [302.A.12].
 - Confirm that the Channel slopes within the PCSM Report are correct as the slopes appear to be inconsistent with the slope labels on the Land Development Plans [302.D].
 - Confirm the peak flow discharge utilized in the FES-32.1 riprap apron calculation is correct as the 100-yr Detention Basin C1 FES-32.1 to I-31.8 storm sewer report utilizes a peak rate of 33.10 cfs [302D].
 - The provided storm sewer system calculations utilize the 100-year design storm for capacity and inlet surcharge analysis which is acceptable. However, the Engineer must provide a separate storm sewer system analysis, utilizing the 10-year design storm, to document gutter spread on the loop road. This analysis should include bypass and inlet capture calculations (sag will not be acceptable unless explicitly in a sag condition) [303.K.8].
40. It is noted that submission #3 has provided sufficient information for HRG to proceed with the detailed review of the PCSM Report and all accompanying calculations. The following comments are provided for the routing calculations:

- a. Revise the Basin A1 and Basin A3 contour areas within the routing calculations to be consistent with the plan contour areas [302.D].
 - b. Area shown on DA map (and used in routing analysis) to Basin A1 is 24.43 acres, however, the measurement of area to Basin A1 on Post-DA map is approximately 23.99 acres. Revise accordingly [302.A.17].
 - c. For Post Undetained Area - POA A - DP2 Time of concentration, the sheet flow was calculated using a length of 150 feet and a slope of 3.1 percent. The contours where the Tc line appears on the DA map as steeper and measures 8% over 150 feet. Confirm the sheet flow slope is correct or revise accordingly [302.A.17].
 - d. Table 3.2 - Post-Development Peak Runoff flows - Post Undetained POA A does not match the routing analysis. Revise accordingly [302.B.10].
 - e. The routing summary shows a blank space for the 1-yr and 2-yr events for POA C. Additionally, the peak runoff summary within the narrative did not consider the combined outflow from POA C Undetained and Rate Basin C1. This comment also applies to the Rate Tab within the DEP PCSM Spreadsheet in Appendix V [302.D].
 - f. Revise the Tc for Post Undetained POA R. Reduce the sheet flow length from 177 feet to the max of 150 feet [302.A.17].
 - g. The routing calculations for Post Combined POA V do not include the area from Post Detained Temporary Basin V whereas the existing POA V routing calculations do include this area. This accounts for a loss of 22.15 acres in the pre vs post rate analysis. Additionally, the peak rate values shown in the Rate Tab of the DEP PCSM Spreadsheet do not match the routing analysis or Table 4.1 of the narrative. Revise accordingly [302.A.17 & 302.D].
41. It is noted that submission #3 has provided sufficient information for HRG to proceed with the detailed review of the PCSM Report and all accompanying calculations. The following comments are provided for the PADEP PCSM volume calculations:
- a. Review the disturbed areas used for each POA in the PADEP PCSM Spreadsheet Volume calculations. Several POAs do not match between the total area used and the area measured on the DA Maps provided in Appendix III of the Phase 1A PCSM Report. Additionally, a larger Disturbed area is measured on the DA maps within all of the POAs than the 131.99 acres that is listed in the LOD table in Appendix III of the Phase 1A PCSM Report [302.D].
 - b. Review and update the Limit of Disturbance shown on PRE DA-1A and POST DA-1A in Appendix III of the Phase 1A PCSM Report as the LOD near the location of Basin D1 is not consistent [302.A.14].
42. 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. Current hydraflow models show a theoretical sub catchment equal to 1/3 the drainage area (in the case of the MRC in C1) going to one cell. Current storm sewer appears to analyze line with a rational analysis for capacity only to detention basin. Previous designs we have reviewed have used dynamic routing to account for backwater conditions. [302.D]* When reviewing background provided by applicant inconsistencies in multiple drainage areas to the MRCs cells (1/3 & 1/2) and overall SCMs were observed. HRG is generally in agreement with the modelling methodology proposed by the applicant but is requesting the Engineer provide a delineated drainage area to the MRC cells (can be a combined area when multiple cells are utilized) and a weighted curve number to confirm peak rate hydrographs within the routing calculations.
43. Provide clarification of review status of MRC designs with PaDEP some conditions in the spreadsheet appear to be out of compliance with DEP guidance and DEP cautions against marking approved without

reviews. Email from PaDEP clean water is indicating ultimately some level of preliminary approval but not final approval [302.D]. *

44. With the submission of infiltration testing locations and test pit locations a complete review has been completed and the following items require additional clarification [303.H.12].
 - a. With use of PaDEPs MRC guidance please provide documentation that DEP has accepted the number of test pits and infiltration test as adequate. PaDEP MRC guidance August 15, 2025 indicates that a minimum of 1 test per 40,000 sf of disturbed area is required. Provided PDSC sheets indicate a ratio of .4 and show a large amount of site area excluded as upland area.
 - b. Please provide documentation of how a design infiltration rate of 1.71 was derived (provided DEP spreadsheet). ECS report summary indicates in TP-129 and TP-131 a rate of .25 and .13 in/hr. Given that these are the only tests reported inside the basin footprint the design rate should be based on these tests.
 - c. Confirm the limiting layer listed in the PDSC for TP-129 it is indicated at 420.1 which conflicts with the required 2 ft clearance for an infiltration basin.
 - d. Please provide documentation of how a design infiltration rate of 2.39 was achieved for basin A3. Three tests TP-110(4.23 in/hr), TP-109(0.53 in/hr), and TP-108 (0 in/hr) were reported in the area with TP-108 being the only valid test located within the basin footprint which has a reported rate of 0 in/hr.

TRAFFIC

1. Demonstrate that the Traffic Impact Studies has been approved by the Township's traffic consultant [717].
2. Regarding the mitigation to install a 100' West bound Right Turn Lane at the intersection of SR 11 and Country Club Road, the TIS review engineer recommends that the applicant incorporate this mitigation in a Developer's Agreement between the Developer and Middlesex Township and revise the mitigation description in the TIS. The TIS recommendation should be worded in a way that explains that mitigation is needed for the identified movement, but the scale and nature of the mitigation will be determined by PennDOT as part of their Highway Occupancy Permitting process. The Developer can then include a statement that "Traffic analysis indicates that a 100' westbound right turn lane appears necessary and appropriate."

COUNTRY CLUB ROADWAY IMPROVEMENTS

1. Based on discussions during the November and December coordination calls, HRG understood that the Country Club Roadway Improvements were to be a section of the Phase 1A Plan but the current submission includes a stand-alone plan set for Country Club Road. In addition, during previous coordination calls, the developer indicated their intent to provide design and financial security for all Country Club Roadway improvements (Phase 1 and Phase II) at the same time, but the plan provided describes only the improvements along the frontage of Phase 1. Please clarify.
2. The property abuts both sides of Country Club Road in several areas where its horizontal curves do not meet the minimum radius requirement for collector streets. Clarify how these horizontal curves will be corrected within the project area. [703.A.10 and 703.H.2]. * **A modification has been requested for this requirement.**
3. Clarify the grading in the area of Entrance No. 2. It appears cross slopes of 15-20% are proposed in this area. [Table 703.1]* It appears contours were simply removed from the plan in this area, so compliance with table 703.1 cannot be verified.

4. A minimum pavement width of 36' (18' each side of centerline) is required for collector roads. The plan proposes 24' (12' each side of centerline.) Please revise. [Table 703.1]* The applicant has proposed an alternate configuration for Country Club Road that includes a 16' paved width from centerline on the side of Country Club Road facing the development and 12' from centerline on the opposite side of the road. The proposal also includes the full reconstruction of both lanes of Country Club Road as opposed to widening on one side only. **A modification of this requirement has been requested.**
5. Provide sight distances for the proposed intersections [703.K.1 and 501.C.15].* The applicant has provided PennDOT Form M-950S for each driveway and has completed it with information necessary to compute the required sight distance. This required sight distance is also depicted on Sheet 17 of the Country Club Road plan set. The provided sight distance must also be indicated in the sight distance analysis, and the analysis must be signed and sealed by a Professional Engineer [703.K.1].
6. Provide clear sight triangles for the proposed intersections.* [703.K.3 and 501.C.15] The plan set has been revised to provide a sight distance exhibit, but clear sight triangles at the dimensions specified in 703.K.3 have not been provided.

ITEMS TO BE ADDRESSED IN THE FINAL PLAN

1. Polychlorinated Biphenyls (PCBs) are a known contaminant from substations. The discussion of the potential for PCB contamination and how they are mitigated should be included either in the EIA or the PCSM Report. [303.K.14].* The engineer states that the final substation design will include an Oil Containment System designed by PPL. The Final Phase IA Land Development Plans should provide additional details on the Oil Containment System designed by PPL's substation engineer.
2. Specify on the storm profiles where a non-standard inlet box is required. For example, Inlet I-13.2 is not constructable utilizing a standard box. Provide a construction detail and labeling for any type of box utilized [302.A.13].
3. Provide a financial security estimate for the proposed site improvements. [1301]
4. Provide a financial security calculation for the "on-site" and "off-site" Country Club Roadway improvements to be bonded in association with the Phase 1 plan. [703.D.2]
5. Provide a Final Landscape Plan [719.B.2 and 3].
6. The applicant has indicated that financial security will be provided for offsite areas of Country Club road that have the potential to be degraded by construction traffic. Provide an estimate of this value for review.

ITEMS TO BE ADDRESSED IN THE DEVELOPER'S AGREEMENT

1. Include a Stormwater Management Operation and Maintenance (SWM O&M) Agreement. [502].
2. Demonstrate that a deed restriction has been established to require SWM O&M by any future owners of the affected properties. [501.B.1.a].
3. Establish financial security for on-site improvements. Provide a cost estimate of these improvements for review [Section 1301].
4. Establish financial security for the improvements to Country Club Road along the site frontage and for offsite areas of Country Club Road that have the potential to become degraded by construction traffic due to the Road's posted 10-ton weight restriction. Provide a cost estimate of these improvements for review. [703.D.2]
5. Establish financial security for the right-turn lane from westbound Route 11 onto northbound Country Club Road, as recommended in the TIS.

6. Regarding the Country Club Roadway improvements, include provisions regarding the timing and mechanism whereby the construction of Country Club Road improvements will be initiated. Suggested provisions of this agreement include:
 - a. Upon notice by the Township, the developer will have 180 days to begin construction and 365 days to complete construction of the roadway improvements.
 - b. The Township may require improvements to be constructed in up to two separate phases as work on the development proceeds, but the Township will not require roadway construction in areas where construction traffic serving the data center site is still active. For the purpose of this agreement "no active construction" will mean no building permits or certificates of occupancy have been issued within the last 90 days.
 - c. The Township may require that construction traffic be directed to exclusively use either PA Data Drive Entrance #1 or PA Data Drive Entrance #2 if doing so would prevent construction traffic from traveling upon portions of newly constructed roadway.
 - d. These suggested provisions assume that the entire frontage of Country Club Road will be bonded in Phase 1. If the Phase 1, Phase 2, and/or Phase 3 frontage will be bonded separately, these provisions may require modification.

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.



J. Michael Hess, PE
Team Leader

JMH

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