



February 20, 2026

Middlesex Township Planning Commission
Attn: Mark Carpenter / Bud Grove
350 North Middlesex Road, Suite 1
Carlisle, PA 17013

SUBMISSION SUMMARY

PLAN NAME: PAX-1 PHASE 1B PRELIMINARY LAND DEVELOPMENT PLAN
APPLICANT: Carlisle Development Partners, LLC
PROJECT: Country Club Road, Carlisle, PA 17015
LOCATION:
PLAN DATES: 11/21/2025; Last Revised 02/20/2026

Dear Mr. Carpenter and Mr. Grove,

We received your comment letter, dated January 22, 2026, regarding the PAX-1 Phase 1B Preliminary Land Development Plan. Our responses to your comments can be found below in bold.

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?

Response: A waiver request for section 707.A.1 is requested for pedestrian sidewalks due to the high level of security in and around these facilities, no public foot traffic is expected within the data center complex, as there are no connecting sidewalks to or near the property. Employees will be accessing the complex via automobile. The addition of sidewalks would also increase the impervious area of the site and adversely affect stormwater runoff.

Please confirm if reviewer believes that this waiver is required? Sidewalks are provided along pedestrian and parking areas within the interior of the campus. 707.A.1 specifically requires sidewalks along streets in which case no streets are proposed as part of this plan.

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.

Waiver for Section 303.K.9 – Swales Grades has been removed from the cover, and is not being requested with Phase 1B Preliminary Land Development Plan.

3. Recommendations regarding a potential modification of infiltration requirements on this site are provided as a separate memo.

Response: The Applicant respectfully requests a modification to the applicable infiltration requirements of the Middlesex Township Stormwater Management Ordinance based on extensive

site infiltration testing demonstrating that the soils exhibit minimal to nearly no permeability. In limited locations where feasible, infiltration basins have been incorporated to the maximum extent practicable; however, for the majority of the site, and in coordination with PADEP, the project will implement an alternative BMP approach utilizing small Modular Recharge Cells (MRCs) for water quality treatment with higher storm events bypassing to detention facilities. While not specifically designed for infiltration, these systems will allow minor incidental infiltration, with the majority of discharge occurring laterally to the adjacent creek floodplain in a manner that mimics existing runoff characteristics. This is the same stormwater management approach previously reviewed and agreed upon as part of the Phase 1A Preliminary Land Development Plan.

ZONING COMMENTS

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.
Response: As noted, PA Data Drive will be financially secured prior to approval of this Plan to satisfy this comment. The Financial Security Estimate is currently under review as part of Phase 1A.
2. Provide required and proposed max lot coverage in the zoning data table (sheet 2). Only max impervious coverage is listed [Table 2.18].
Response: Zoning Data Table on Sheet C1B 003 has been updated with this information.
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.
Response: Lot 1B Areas have been updated for consistency throughout the Plan.
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.
Response: Impervious coverages and percentages have been updated on Sheet C1B 003 and C1B 004 for consistency.
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.
Response: The 1,000-foot building façade setback has been revised as requested. Please see Sheet C1B 005 for example.
6. Submit Architectural Plans documenting compliance with the building façade requirements [2.18(G)1].

Response: Building façade details are in development by the end user. These will be available during Final Land Development, and we request to defer this requirement to that review to provide accurate information reflecting expected design.

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].

Response: Foundation plantings will be finalized when final architectural plans are complete.

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].

Response: Appropriate screening will be added upon finalization with the end user. We request this detail be deferred to Final Land Development Plan for Phase 1B to provide sufficient time for the end user to complete building design.

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].

Response: Floodplains are delineated by separate line types, indicated by “100-year” and a “500-year”, as shown on the legend provided on C1B 009.

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].

Response: Areas within the Riparian Buffer Overlay District are delineated by the “RB1” line type, as shown on the legend provided on C1B 009.

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].

Response: Riparian buffers are extended where applicable. Please see Sheets C1B 101 and 102.

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.

Response: The requested water and sewer agreement was executed on 01/15/2026. The agreement was to acquire the rights to reserve sewer and water capacity as requested by Carlisle Development Partners, LLC.

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.

Response: The previously submitted Rate Payer Study shall be removed from the EIA and treated as reference material only, as it is limited on Pennsylvania and PPL specific information. An updated letter provided with Phase 1A resubmission on 02/06/2026 from PPL is provided to address specific points requested by township staff and collectively reviewed on the 2/4 meeting with PPL. Per legal requirements, PPL will not publicly release the interconnection agreement but has committed to notifying the Township once formally executed in the coming months. The enclosed letter describes this agreement process and how other PPL customers are fully protected from risk.

14. Provide a Noise Study [3.04(G)2.g].

Response: A preliminary noise study for Campus 1, 2 & 3 is provided as part of this submission. This study is intended to demonstrate ability to comply with ordinance requirements. Noise studies will be updated and cumulative for each phase of the project and submitted with final Land Development plan phases as final building designs and equipment are specified.

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.

Response: 25-foot height requirement is requested. Proposed lighting is shown on Sheet C1B 701.

16. Provide the Parking Analysis Report to support the parking requirements (sheet 2) [Table 4.15.1 & 4.15(D)2].

Response: Please see the parking analysis provided as part of this submission.

17. Provide the required/proposed ADA parking space count in the Zoning Regulations (sheet 2) [4.15(C)].

Response: Required and proposed ADA parking space count has been added to Sheet C1B 003.

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)].

Response: Sidewalks and doors have been added to Sheets C1B 201-207.

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].

Response: Curbing is called out on Sheets C1B 201-207, as applicable.

20. Provide required/proposed loading spaces in the Zoning Table (sheet 2); recommended under Parking Requirements [4.15(G) & 2.18(G)2.a].

Response: Proposed and required loading spaces have been added to the Zoning Regulations on Sheet C1B 003.

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.

Response: Existing Drawing Index on Sheet C1B 001 has added a column for page numbers to satisfy this comment.

SUBDIVISION AND LAND DEVELOPMENT COMMENTS

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].

Response: Proposed demolition of any existing facilities is shown on Sheets C1B 101 and 102.

2. Identify the use of all proposed buildings on the plan [501.C.2.b].

Response: The proposed use for the campus is identified in the Zoning Regulations Table on Sheet C1B 003 as "data center." Additionally, individual buildings are labeled applicably on Sheets C1B 201-207.

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].

Response: Legends are revised, where appropriate.

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].

Response: Adjoining property owners, reference, and lot numbers are provided on Sheet C1B 005.

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].

Response: Elevations are provided on sheets containing grading and stormwater structures. Please see Sheets C1B 301-307.

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.

Response: Spot elevations have been added throughout the grading plan, where applicable. Please see Sheets C1B 301-307.

7. Unless a modification is granted, all street profiles shall be drawn at a minimum vertical scale of 1" = 5' (501.C.12)

Response: Profiles are provided at a vertical scale of 1"=5'. Please see Sheets C1B 501-514.

8. Show the location of all proposed fire hydrants [501.C.13].

Response: Proposed fire hydrants are delineated on Sheets C1B 401-407.

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].
Response: Water extension information related to Phase 1B is currently in design and will be provided when available.
10. Provide the location of and description of all existing and proposed survey monuments and markers on the plan [501.C.16].
Response: Survey monuments and markers are called out on C1B 003's tract map.
11. Show the size, location, pavement markings, and signage for any fire lanes on the plans [501.C.17].
Response: There are no dedicated fire plans provided as part of this plan. The campus layout provides ingress and egress for fire equipment in case of emergency. As part of final land development agreements the developer and end user will meet with local EMS services to prepare a detailed first responders manual and protocol.
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].
Response: Typical cross-section of proposed access drives has been added to Sheet C1B 801.
13. Identify the tan cross-hatched easement that runs parallel to the red "Existing Transmission Line Easement" on the plan [501.C.19].
Response: The tan cross-hatched easement is a PPL Transmission line easement. Please see Sheets C1B 013-014.
14. Identify the beneficiary of the existing "Existing Transmission Line Easement" and the unidentified easement on the plan [501.C.19].
Response: The beneficiary of both easements is PPL Electrical Utility Corporation. Please see Sheets C1B 013-014.
15. Provide a completed PADEP Sewage Planning Module [503.A.3].
Response: The project team met with PADEP Sewage Planning staff on 01/26/2026 to confirm the appropriate sewage planning requirements. During that meeting, DEP confirmed that sewage planning has previously been approved through PADEP under Act 537 for the pump station approved as part of the Cumberland Knoll residential plan. The proposed domestic flow from all data center buildings will be less than the permitted flow for the approved pump station. As a result sewage planning for the data center campus is not required. See technical sewer memo submitted demonstrating domestic sewer planning is adequate for the proposed development. However, DEP has requested a formal Component 3 Sewage Planning Module be completed for this project so that the Industrial Waste Water (IWW) discharge for the project is provided to DEP with a down stream conveyance model demonstrating adequacy in the existing municipal authority sewer system. The IWW system is currently being modeled and designed. This will be included within the Component 3 application and requested to be a condition of final land development approval.

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].

Response: List of applicable approvals is provided on Sheet C1B 002, Plan Note 22.

17. Provide a report from the Middlesex Township Municipal Authority confirming that proposed water and sewer designs meet their technical requirements [503.A.9].

Response: Approval from Middlesex Township Municipal Authority will be provided when received.

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].

Response: The Geotechnical report submitted with Phase 1A is intended to cover all phases of development.

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].

Response: There is no grading encroachment within the 100-year floodplain near Point of Analysis Q. This specific area has been revised to remove the encroachment.

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.

Response: Grading has been updated throughout the Plan. Please see Sheets C1B 301-307.

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].

Response: Additional grading detail is provided throughout Sheets C1B 301-307.

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].

Response: These notes are on Sheet C1B 002 Construction Notes.

- 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].

Response: Noted.

- 24. On Sheet C1B 303, the Sheet cut off delineation is shown as "Continue on Sheet C1B 401" instead of "...Sheet C1B 301" [General].

Response: Sheet cut off has been updated to Sheet C1B 301 on Sheet C1B 303.

- 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.

Response: Waiver requested as noted.

- 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.

Response: Sight distance information provided as part of this submission package.

- 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].

Response: Blanket Stormwater Access Easement is granted on Sheet C1B 001.

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 though it is unclear if this is necessary.**

Response: Please confirm if reviewer believes that this waiver is required? Sidewalks are provided along pedestrian and parking areas within the interior of the campus. 707.A.1 specifically requires sidewalks along streets in which case no streets are proposed as part of this plan.

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].

Response: A fee in lieu of dedication is proposed pursuant to Section 710.E.2.b. A memo establishing this is provided as part of this submission.

30. Site Lighting comments are included in the Zoning review [711].

Response: Site lighting comments are responded to accordingly in the Zoning section.

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].

Response: Noted.

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].

Response: Retaining walls are delegated design to be completed during the construction phase. Submittals of this information and design will be provided to Middlesex Township at that time for review, comment, and approval.

33. Provide a Preliminary Landscape Plan that contains all requirements set forth in Section 719.B.1.a-h [719.B.1.a-h].

Response: Preliminary Landscape Plan is provided on Sheets C1B 601-609.

34. Ensure that the legend colors match the appropriate ground covers on Sheet C1B 004 (General).

Response: Legend colors have been updated for consistency. Please see Sheet C1B 004.

ENVIRONMENTAL IMPACT ASSESSMENT COMMENTS

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.

Response: The EIA will continue to be updated throughout the project and resubmitted with each phase and plan comprehensive of prior edits and additions.

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. **(This is not relevant, we are capped by metered approved flows noted)**
 - 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. **(This is not relevant)**
 - 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. **(This is not relevant)**
 - 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. **(Developer is communicating with MTMA)**
 - 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. **(This is not relevant)**
 - 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. **(This will be regulated and approved under prior comment by MTMA)**
 - 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. **(This will be regulated and approved under prior comment 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.

Response: The project team acknowledges HRG's advisory comments regarding water and sewer service for Phase 1B. The end user, who has recently joined the project, will utilize on-site water storage and industrial wastewater equalization/attenuation systems as depicted on the submitted plans for each campus. These systems are specifically intended to manage peak demands and discharge rates to ensure compliance with available potable water allocations and receiving sewer capacity. The project has secured and received approval for water and sewer service from Middlesex Township Municipal Authority (MTMA). The anticipated approval and construction of Well #2 is a separate MTMA capital improvement project and does not affect the project's previously acquired and approved water and sewer service allocations.

The project team is actively coordinating with MTMA to utilize their system data in completing detailed water and wastewater studies, including hydraulic modeling and evaluation of equalization systems. Wastewater discharge will be coordinated with and modeled to the treatment facilities of Carlisle Borough Authority to demonstrate compliance with conveyance capacity, treatment requirements, and applicable pretreatment standards. The project will obtain all required industrial discharge approvals and comply with the Authority's Industrial Pretreatment Program, including headworks loading limitations. Water usage, storage, reuse, and cooling system design will be engineered to remain within the approved allocation provided by MTMA. The project team and end user will also coordinate, as required, with the Susquehanna River Basin Commission (SRBC) to secure the required Consumptive Use permit.

Overall, the project's water supply, wastewater conveyance, storage, equalization, pretreatment, and regulatory coordination efforts are being advanced in collaboration with the appropriate authorities to ensure system capacity, redundancy, and compliance are maintained throughout all phases of development. In the near future, it is our intent to provide in the preliminary land development phase a 30% design of this water and sewer system which includes preliminary sizing and layout of utility lines, pump stations and water storage facilities. Detailed final design, sizing and approvals are requested to be part of Final Land Development approvals for each campus. These final designs will also include engineering and permits to meet all industrial pre-treatment requirements of MTMA and approvals by MTMA and SRBC. These additional design details can then be added to a revised EIA as part of final land development approval.

STORMWATER MANAGEMENT COMMENTS

- 1. Demonstrate that an NPDES permit has been secured for the proposed site disturbance. [109]
Response: An NPDES permit modification for the area is currently under review by the CCCD. That NPDES permit once issued will include Phase 1A and 1B earthwork and stormwater.
- 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]

Response: All Chapter 105 permits required were previously submitted during Phase 1A. No additional Chapter 105 permits are required for Phase 1B.

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].

Response: Drainage easement will match the 50' Township riparian buffer. This is called out as the line type RB1 on the plans.

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].

Response: Sheets C1B 017 and C1B 018 has been added to the plan set depicting the location of the easements. Similar to Phase 1A, a separate plan with metes and bounds will provided with the final plan submission.

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].

Response: Labels have been updated for legibility.

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].

Response: Additional inlets have been added throughout the campus layout.

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].

Response: Additional labels have been added to the plan.

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].

Response: Campus 1 will have a curb around the outer perimeter as well as internally. The grading has been revised to reflect the curbing.

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].

Response: Additional spot elevations have been added to the plan. Additionally, the pad has a curb around the outside perimeter with a slope up to the security fence.

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].

Response: Roof drains and header pipes have been added to the plans.

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].

Response: Grading has been revised along the fence and curbing added to better define drainage patterns.

12. Confirm that there is sufficient cover over the pipes for storm runs I-1.3 to I-1.6 [302.A.12].

Response: Pipe profiles have been updated.

13. Inlet I-1.5 has an invert out higher than the invert in. Revise accordingly [302.A.12].

Response: Pipe profiles have been updated.

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

Response: Additional pipe profiles have been added.

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].

Response: Additional soil labels have been added to the plan.

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].

Response: Building off of the limit of disturbance from phase 1A, the overall limit of disturbance of 300 acres is called out. This area is cumulative to date since areas of 1A and 1B will be disturbed simultaneously. A chart tracking the limit of disturbance increases is included in the PCSM report Appendix III.

17. Ensure all proposed contour lines tie into the Phase 1A proposed contours where applicable. Also ensure the grading for Campus 1 Eastern Access is shown to tie into PA Data Dr. [302.A.18].

Response: Phase 1A contours are shown in a brown color and the proposed phase 1B contours will tie into them.

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].

Response: A standalone O&M plan has been added to the plans as sheet C1B 809.

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].

Response: A standalone O&M plan has been added to the plans as sheet C1B 809.

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].

Response: Orange construction fence is included on the E&S plans during stage 3. A note and depiction has now been added to the land development plan on the Existing Conditions and Demo Plan sheet C1B 101.

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.**

Response: A waiver has been requested.

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].

Response: The pipes have been raised to enter six (6) inches above the basin bottom.

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].

Response: The outlet structure has been modified to have a 6" orifice therefore no trash rack is shown.

24. A sediment forebay with a hardened bottom shall be provided at each inlet into detention basins [303.J.11].

Response: A sediment forebay similar to phase 1A have been added to Infiltration Basin F1. Also, similar to phase 1A, snout's will be added to the storm systems entering MRC basins.

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].

Response: The box sizes will be added to the final plan submission similar to Phase 1A.

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.

Response: A modification has been requested.

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.

Response: A modification has been requested.

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].

Response: A certification has been added to the cover sheet and will be completed prior to final plan approval.

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].

Response: The routings have been updated to match the pipe profiles.

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].

Response: The details and profiles have been updated to be consistent.

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].

Response: The cell profile has been updated to reflect the new grading and revise the rate basin invert to be 418.

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].

Response: The outflows from the mrc outlet structures are lower than the upturned elbow entering the outlet structure.

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].

Response: The detail has been updated to be consistent with the profile.

34. Depict the Infiltration Basin Forebay in plan view [302.A.10].

Response: The forebay is depicted with a thick gray line at the inflow of the basin.

35. Provide riprap apron details and calculations for the following structures: [302.A.13 & 302.D].

a. K1-FES 1

Response: The details have been updated.

b. FES K1-C.1 to FES K1-C.5 (for both basins)

Response: The details have been updated.

c. R1-FES 1 to R1-FES 3

Response: The riprap aprons have been removed from the MRC cell outflow pipes.

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].

Response: The grading has been revised to reflect no disturbance within the floodplain.

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}

Response: Table 4.1 has been updated in the PCSM report.

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]

Response: A cumulative chart for the areas used in the rate calculations is now included at the beginning of Appendix III.

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.

Response: The drainage area map has been updated to reflect the divide when both phases 1A and 1B are built.

- 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.

Response: The grading and drainage areas have been updated to reflect the grading that will be present when 1A and 1B are completed.

- 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.

Response: The drainage area maps have been updated to include the additional contours.

- d. Provide Phase 1A 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.

Response: Phase 1A drainage has been accounted for in the areas where 1A and 1B coincide. Updated rate and volume tables are included at the beginning of Appendix III tracking the overall progress of the project.

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]

Response: A cumulative chart inclusive of Phase 1A is now included at the beginning of Appendix III of the PCSM report.

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]

Response: The current MRC design is under review by the CCCD. A copy of the approval will be forwarded upon receipt.

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

Response: The underdrains and cleanouts have been added to the plans.

- b. Provide quantification of planting totals for MRC plantings as described on sheet C1B 805

Response: The quantities have been added to the detail 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.

Response: The hydraflow hydrographs calculations show a 1/5 drainage area to the MRC cell for routing purposes. The hydraflow storm sewers calculations include multiple outflow pipes from the manifold. Included in the PCSM report are two sets of storm sewers calculations. The first is the 100-yr event that shows flow from the site and into the rate portion of the basin. The second is the 2-yr event with the final overflow pipe to the rate portion removed and the manifold for conveyance to each cell. Each of these storm sewers calculations utilized a spillway elevation as the starting hgl to analyze backwater.

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.

Response: The stage storage for the mrc cells is located in the hydrographs print out for a single cell.

- 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.

Response: The weighted curve number worksheets have been updated for each mrc basin. Also, areas that fall directly on the rate basin have been removed from the CN calculations for the mrc cell routings.

- 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.

Response: A copy of the CCCD submitted EP analysis is included in the PCSM report.

Basin K

- g. Provide stage storage back up for the MRC Bioretention cells. Volume data is based on user input without back up.

Response: The stage storage for the mrc cells is located in the hydrographs print out for a single cell.

- 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.

Response: The routings and MRC spreadsheets have been updated to remove the area that falls directly on the rate basin similar to phase 1A.

- i. Provide spillway stability calculations for K1 forebay to K1 Peak Rate detention basin.

Response: A stability calculation is included in Appendix V of the PCSM report.

- j. Provide hydraulic routing documentation that MRC forebays do not require emergency spillways or provide emergency spillway calculations.

Response: Per the MRC DEP guidance, the maximum hydraulic allowance for diversion required is 6" for individual MRC cells therefore the spillways for each cell are set to be 6" below the top of the cell berms.

- 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.

Response: A copy of the CCCD submitted EP analysis is included in the PCSM report.

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.

Response: The stage storage has been updated.

- 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.

Response: A copy of the CCCD submitted EP analysis is included in the PCSM report.

- n. Provide forebay details and plan view mapping in alignment with Phase 1A comments.

Response: A forebay similar to phase 1A has been added to the basin. The detail can be found on plan sheet C1B 805.

- 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.

Response: The flow path segments have been added to the overall 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.

Response: The Tc is from the storm sewers calculations.

- c. Confirm that all Tcs related to detained and un detained areas in R1 and R2 are included.

Response: Tcs for the detained and undetained have been added to the drainage area plans in Appendix III.

- 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]

Response: Dewatering time for the Infiltration Basin and MRC Basins have been provided within the Long-Term O&M Schedule section of the PCSM report.

- 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]
Response: This requirement statement has been added as the last statement for the Infiltration Basin and MRC Basins within the Long-Term O&M Schedule section of the PCSM report.
 - 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]
Response: The inspection and reporting frequency has been updated for the MRC orifices and pipes to be clearly defined and is within the Long-Term O&M Schedule section of the PCSM report.
 - 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]
Response: Mowing frequency has been quantified for each MRC and Infiltration basin and is within the Long-Term O&M Schedule section of the PCSM report.
 - e. Provide O&M requirements specific to the infiltration basin in POA F. [501.C]
Response: O&M requirements for the Infiltration Basin (F1) have been added within the Long-Term O&M Schedule section of the PCSM report.
 - 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]
Response: The appropriate naming conventions for each SCM have been added to the specific O&M section each applies to and is within the Long-Term O&M Schedule section of the PCSM report.
 - 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]
Response: A statement regarding “For Conveyance Only” has been added to the other SCMs that are not part of regulatory compliance measures and is within the Long-Term O&M Schedule section of the PCSM report.
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]
Response: Additional columns have been added to the volume chart within the PCSM report to separate the total volume infiltrated versus the total volume treated by the MRC basins for each POA along with a site total. Also, a copy of the PDSC spreadsheet and exclusion mapping is included within Appendix V – Test Pit Findings of the PCSM report.
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.

Response: A map, similar to 1A, has been included in Appendix V – Test Pit Findings of the PCSM Report.

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]

Response: Additional maps have been added to Appendix III.

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]

Response: Additional maps have been added to Appendix III.

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]

Response: A forebay has been added at the inflow to the infiltration basin, Basin F1. The MRC cells act as forebays for basins R1 and K1.

TRAFFIC COMMENTS

1. The Township's Traffic Engineer (Michael Baker) has reviewed and recommends acceptance of the project's Traffic Impact Study, third revision.

Response: Noted

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)

Response: Not required for this phase. Bonded with Phase 1A.

COUNTRY CLUB ROADWAY IMPROVEMENT COMMENTS

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.

Response: Country Club Roadway improvements associated with Phase 1A have been submitted, and will be addressed with the Phase 1A Preliminary Land Development plan review.

ITEMS TO BE INCLUDED IN THE DEVELOPER'S AGREEMENT

1. Include a Stormwater Management Operation and Maintenance (SWM O&M) Agreement.

Response: Noted

2. Demonstrate that a deed restriction has been established to require SWM O&M by any future owners of the affected properties.

Response: Noted

3. Establish an Operation and Maintenance agreement for PA Data Drive.

Response: Noted

4. Establish financial security for offsite traffic improvements, namely a right-hand turn lane from westbound Route 11 onto northbound Country Club Road.

Response: Financial Security calculations for bonding purposes have been provided and reviewed as part of the 02/60/2026 Phase 1A resubmission.

5. Establish financial security for on-site improvements. Provide a cost estimate of these improvements for review [Section 1301].

Response: Financial Security calculations for bonding purposes will be provided prior to approval of this preliminary Phase 1B plan.

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].

Response: Noted

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].

Response: Noted

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].

Response: Noted

4. Provide a Final Landscape Plan (719.B.2 and 3)

Response: Noted

Please feel free to contact me with any questions or concerns. I can be reached via email at nlong@livicco.com.

Sincerely,

Nick Long – Sr. Project Manager, CEA Market Lead
LIVIC Civil
1015 Mumma Road, 2nd Floor
Wormleysburg, PA 17043

Enclosures

Cc: File (1258-03)