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PHASE 1B PRELIMINARY 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-B

Middlesex Twp. Plan No. TPF 25-25

April 9, 2026

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

Submission:	Dated:	Last Revised:
Plan Set for Phase 1B (111 sheets)	11/26/2026	03/27/2026
Post Construction Stormwater Management Report for Phase 1B (SWM Report)	November 2025	3/27/2026
Utility Needs Assessment	Not Dated	
Response to Comments	3/27/2026	
Response to Comments – Infiltration	3/6/2026	
Waiver Request Letter	3/27/2026	

The applicant has submitted the following requests for relief:

Requested Waiver(s):	Ordinance Section:	Relief Requested:
Plan Size and Scale	SALDO 501.A.2	Modification
Location Map Scale	SALDO 501.A.6	Modification
Provide metes and bounds for easements	SALDO 501.C.19, 303.J.12, 303.K.12	Deferral (until Final Plan)

Curb and Sidewalk along Country Club Road and PA Data Drive (See Waiver Note 1)	SALDO 703.A.10	Waiver
Depressed Curb at Driveway Entrance	SALDO 703.I.4	Waiver
Provide Sidewalk (See Waiver Note 1)	SALDO 707	Waiver
Scale of maps and exhibits within the EIA	SALDO 718.D.3.a, 718.D.4, 718.D.4.b, 718.D.4.c, 718.D.4.d	Modification
Detention Basin Side Slopes > 4:1	SWM 303.J.3	Modification
Dewatering time > 48 Hrs.	SWM 303.H.17	Modification
Infiltration of Stormwater	SWM 303.B.2	Modification
Provide Construction Details for Inlets	SWM 302.A.13	Deferral to Final Plan
Provide a Final Landscaping Plan	SALDO 719.B.2 and 3	Deferral to Final Plan
Provide Geotechnical Engineer Certification for MRC Design	SWM 303.H.12	Deferral to Final Plan

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

WAIVER NOTES

1. A sidewalk note which reads, "The Owners of these lots, upon notification by Middlesex Township, shall be responsible for the construction of sidewalks to Township Specifications within six (6) months of the date of such notification." The applicant should clarify the applicability of the sidewalk waiver requests (703.A.10 and 707) and this note as they relate to PA Data Drive and Country Club Road.

ZONING

1. A minimum lot width of 200 feet is required [24.03].* Because it does not have roadway frontage, lot 1B does not meet this requirement. As discussed, an alternative arrangement is to establish financial security for the construction of PA Data Drive before any approvals of the Phase 1B Land Development plan are requested (1/22/26). *This comment will be removed when the financial security for PA Data Drive is in place.*
2. Provide the Parking Analysis Report to support the parking requirements (sheet 2) [Table 4.15.1 & 4.15(D)2].* Confirm the parking analysis report, parking data (sheet 3) and site plans (sheets 21-27) are consistent with one another. The February 2026 parking analysis report notes 258 spaces are required and 280 spaces are proposed. The parking data (sheet 3) notes 258 spaces are required and 324 spaces are proposed. The site plans (sheets 21-27) appear to show 309 spaces +/- being provided. While adequate spaces appear to be provided the references should be revised for consistency.

3. *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 21-27). [4.15(F)4]. Curbing appears to have been added along the outer drive perimeter and is noted on the curb between data centers on sheet 23. Confirm curb is provided for parking area definition, landscape delineation/protection and pedestrian/vehicle separation. Additional labels are needed since the site is relatively flat and the contours do not clearly depict curb lines. (The curb approach appears to differ from Phase 2, where no curb is proposed between data centers.)

NOISE

1. *Because Phase 1B was submitted under the 2025 Zoning Ordinance instead of the prior zoning ordinance with a data center overlay, updated noise standards apply. Specifically, the performance standards section has been updated from prohibiting “dangerous, injurious, noxious, or otherwise objectionable...noise or vibration” to the quantitative standards described in article 4.19 and table 4.19.2. Section 304.G.2.g presents a standard of 70dBA at the property line but specifies that this requirement does not apply during a time of power outage. During times of power outage, when 304.G.2.g does not apply, the ordinance requirement defaults to the performance standards as outlined in article 4.19. The noise study should therefore demonstrate compliance with the ordinance under 3 scenarios:
 - a. No Power Outage, no generators running – 70dBA at the property line
 - b. No Power Outage, generators running – 70dBA at the property line
 - c. Power Outage, generators running – Performance standards in section 4.19 and Table 4.19.2
 - d. Power Outage, no generators running – the applicant can assume that this scenario generates less sound than scenarios A through C and therefore omit it from the analysis.
2. *Regarding the submitted noise study, we have the following technical comments:
 - a. **Comment 1, Page 5, Noise Regulations** – As currently shown in the noise memo, octave levels are not presented at each modeled site location. Provide the octave levels at each modeled site location, in a table format, to ensure compliance with Table 4.19.2 under the applicable conditions described in Noise Comment #1.
 - b. **Comment 3, Page 6, Noise Regulations** – The noise memo indicates that it is recommended to aim for lower operational noise levels. Are there additional mitigation measures and strategies planned to meet this recommendation? If so, include them in the noise study.
 - c. **Comment 4, Page 6, Noise Analysis** – Based on the information provided, it is unclear if the proposed grading plans were incorporated into the surface used in the noise model build condition. Elevation changes as well as other elements such as sound source, facility layout, buildings, etc. can significantly alter modeling outcomes and corresponding sound levels.

- d. **Comment 5, Page 6, Noise Analysis** – To help thoroughly validate the predicted sound levels as presented in the memo, provide a table with the proposed equipment models, operational settings, and sound power. In addition, provide the number of individual pieces of equipment.
- e. **Comment 6, Page 6, Noise Analysis** – It is unclear if the parapet wall is only on one building or if it was included on all proposed buildings. To clarify, provide a figure (heat map of sound levels or similar) for the unmitigated as well as mitigated scenarios.
- f. **Comment 8, Page 7, Results** – Clarify the methodology used to determine the worst-case points along the property line. Since predicted noise levels are just below the impact threshold of 70dBA at the property line, include a more refined grid spacing to ensure there are no impacts predicted. Include additional modeling locations at a max 250 foot spacing in those areas to ensure noise levels don't exceed the 70dBA limit at the property line.
- g. **Comment 9, Page 7, Results** – In order to validate the results of the noise study, provide additional information in Table 2 including ambient/monitored levels, normal operation levels, normal operation with testing generators, and emergency generator(s) operations.
- h. **General Comment 10, Results** – Representative noise receptor modeling typically includes a height of five feet about ground, which represents the average height of the human ear. For each of the modeling receptor locations included in this study, what receptor height was used?
- i. **Comment 11, Page 8, Figure 3** – Provide site plans and facility layout on Figure 3 so the orientation of the facility can be referenced while reviewing the proposed sound levels along the property line.
- j. **Comment 12, Page 9, Figure 4** – What height above ground are these contours calculated? In addition, what grid spacing was used to develop the contours? The heat map on Figure 4 appears to have used a large grid spacing. Provide a smaller grid size to create more precise contours.
- k. **Comment 13, Page 6, Figure 4** – Include site plans on this figure to depict how these contours are oriented around the equipment and sound sources on the parcel.
- l. **Comment 14, Page 10, Conclusions** – Provide an appendix that includes equipment acoustic test sheets so the results of the noise study can be verified.
- m. **Comment 15, Page 10, General Comment** – For noise modeling purposes, which ISO standard was used in the modeling calculations? The ISO9613-2:2024 is more conservative with barrier attenuation when compared to the 1996 edition. The 2024 standard is therefore recommended. If the 1996 edition is used, provide a justification for this choice.

SUBDIVISION AND LAND DEVELOPMENT

1. All street profiles shall be drawn at a minimum vertical scale of 1" = 5'. *The scale of profiles I-5.11 to I-5.1, ``Basin K MRC Cell Profile, Basin R1 MRC Cell Profile do not appear to be consistent with the scale identified on the provide scale bar. Please reconcile. The scale of multiple profiles on sheets C1B 508, 512, 514, and 515 do not appear to be consistent with scales identified on the plan sheets [501.C.12].*

2. Provide a completed PADEP Sewage Planning Module [503.A.3].
3. Provide a report from the Middlesex Township Municipal Authority confirming that proposed water and sewer designs meet their technical requirements [503.A.9].
4. It appears that the temporary construction access will be installed with a 1:1 fill slope which is not acceptable. Revise such that the fill slope is proposed at a 3:1 minimum fill slope [1101].
5. It appears that there is a 1:1 fill slope proposed on Sheet C1B 302 between Data Center Building 1 and PA Data Drive on the southern side of the double security fence. Revise such that the fill slope is proposed at a 3:1 minimum fill slope [1101].
6. 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***
7. 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. The developer has offered a fee-in-lieu of dedication in the amount of \$1,000 per disturbed acre as stated in SALDO Section 710.E.2.b [710.A.3.b] *This comment will be removed when the fee-in-lieu is provided and accepted by Middlesex Twp.*
8. 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].
9. Provide a Preliminary Landscape Plan that contains all requirements set forth in Section 719.B.1.a-h. Depict the location of all utilities and all grading in excess of 3:1 [719.B.1.a-h]. *On Sheet C1B 603, there appears to be a conflict with proposed trees and the water system near the access drive entrance.*

ENVIRONMENTAL IMPACT ASSESSMENT

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].**
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 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].**
4. 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].**
5. 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].**

STORMWATER MANAGEMENT

1. Demonstrate that an NPDES permit has been secured for the proposed site disturbance.* [109] *The Applicant states that the NPDES permit for 1A/1B is under review by the Conservation District.*
2. 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].* *Provide a drainage easement around IB-9.1 to FES-5 and extend the easement around FES-K1 and FES-R1.*
3. IB-3.3 and MHB-3.2 plan view labels are covered by the legend on sheet C1B 305. Revise accordingly [302.A.12].
4. 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.**
5. 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].* *FES-R1.2, FES-R1.4 and FES-R1.6 are not located 6" above the bottom of the basin. Basins K1 and F1 have been adequately addressed.*
6. 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.**
7. 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.**
8. 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].* *The profile and calculations have the 18" invert for OS-F1 at 423.90' whereas the Basin F1 Outlet Structure detail has the invert at 423.40'.*
9. 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].* *Revise the MRC Cell Outlet Structure detail top of structure, basin underdrain invert, basin underdrain invert in, and MRC cell bottom for Basin K1 to be consistent with the MRC Cell profile and calculations.*
10. 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].* *The Basin R1 Flow Splitter Structure detail is still inconsistent with the profile for FS-6.1.*
11. Revise the Infiltration Basin Forebay detail to be consistent with the basin elevations (430.00' basin and forebay bottom elevation and 430.50' pipe inflow invert) [302.A.10].
12. Ensure that the riprap apron details are consistent with the plans and PCSM report for the following structures: [302.A.13 & 302.D]
 - a. EWB-3. Detail indicates 30" SLCPP while plans, profile, and report indicate 36" SLCPP.

13. 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]* This comment will remain as an administrative item until NPDES and DEP approval is received. A final PCSM report and plan should be submitted to the Township with any revisions from outside agency comments [302.D].
14. Basin K - *Provide hydraulic routing documentation that MRC forebays do not require emergency spillways or provide emergency spillway calculations. Applicants' response conflicts with grading and spot elevations C1B 306. Provide clarification via additional spot elevations and grading where the overflows for the MRC cells are located and how flow is directed back into the SCM.*
 - a. *The grading is still unclear where the overflow for the MRC cells will be directed. The forebay emergency spillway calculations have the peak elevation at 423.86' which may result in a ponding depth greater than 6" above the principal outlet within the MRC cells. Additionally, the south eastern tie-in grading by the MRC Cell (FES-K1.5) has a top of berm elevation of 423.50' which would allow water to overflow directly to the Conodoguinet Creek rather than into the rate basin. Revise the grading accordingly so that no more than 6" of ponding can occur above the principal outlets of the MRC cells and so that there is no potential for flow to bypass the downstream rate basin.*
 - b. *Callout the forebay K1 spillway matting on the plan.*
15. Revise the Basin K MRC Cell Profile to depict the MRC Cell outlet structure correctly. Additionally, the spillway/grate elevation on the profile is labeled at 424.00', however, the plan depicts a 425.00' contour at the spillway [302.A.13].* *Refer to comment above.*
16. MRC Basin K appears to have a drainage area of 58.60 acres in the DEP spreadsheets which aligns with the total drainage area including the peak rate basin applicants comments indicated similar to phase 1A it would be include volume only to the MRC cells. Please clarify MRC design spreadsheet is updated please update incremental SCM drainage in PCSM worksheet to be consistent with MRC design.
17. MRC Basin R1 appears to have a drainage area of 21.08 acres in the DEP spreadsheets which aligns with the total drainage area including the peak rate basin applicants comments indicated similar to phase 1A it would be include volume only to the MRC cells. Please clarify. MRC design spreadsheet is updated please update incremental SCM drainage area and volume in PCSM worksheet to be consistent with MRC design.
18. 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.
Based on the Applicant's response on Phase 1A on 02.06.26 it appears that combination of updated guidance and 2006 DEP guidance are being used to determine infiltration rates. Either option is acceptable to the Township it should be clarified which method ECS and Livic are proposing to use. If double ring infiltration testing and traditional factors of safety are proposed 4 to 6 test per acre of infiltration surface shall be provided in accordance with DEP PCSM Spreadsheet Instruction rev. 01-26-

26. Or if basin flood test and other future guidance methods are proposed Ksat calculations and the associated adjustments shall be followed.

At the coordination meeting on 4/8/2026, the Engineer stated that post-construction infiltration testing will be completed prior to installation of the amended soils to verify the as-built infiltration rate. The designer is encouraged to utilize a more conservative factor of safety for the design infiltration rates in case post-development infiltration tests are less favorable than anticipated.

ITEMS TO BE INCLUDED IN THE DEVELOPER'S AGREEMENT

1. Include a Stormwater Management Operation and Maintenance (SWM O&M) Agreement.
2. Demonstrate that a deed restriction has been established to require SWM O&M by any future owners of the affected properties.
3. Establish an Operation and Maintenance agreement for PA Data Drive.
4. Establish financial security for on-site improvements. Provide a cost estimate of these improvements for review [Section 1301].

ITEMS TO BE ADDRESSED IN THE FINAL LAND DEVELOPMENT PLAN

1. If/when the project advances to a Final Land Development plan, provide a signed and executed O&M agreement. The O&M agreement shall be recorded within fifteen (15) days of approval of the O&M Plan by the Middlesex Township [502].
2. If/when the project advances to a Final Land Development plan, the deed of each lot shall contain a covenant binding the grantee and all successors title and interest designating the responsibility for operation and maintenance of the stormwater management facilities. Reference to this covenant shall be noted on the cover of the Plans [501.B.1.a].
3. Prior to construction of storm sewer facilities, specifications and/or details shall be submitted to the Township for review and approval, including but not limited to, pipes, inlets and tops, catch basins, head and end walls, stone bedding, and backfill material, as applicable [1406.A.6].
4. Provide a Final Landscape Plan (719.B.2 and 3)
5. Submit Architectural Plans documenting compliance with the building façade requirements [2.18(G)1].
6. 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].*
7. Ground level and roof mounted mechanical equipment requires screening. Generator yards are deemed as mechanical equipment. The generator yard west of Building 1 & 2 shall include screening along the west side (sheets 52 & 56) [2.18(G)2.b].*
8. 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].

9. 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].
10. Storm run I-8.1 to FES-3 is located below the security entrance and the security building which would require the entrance and building to be located within the 20' wide drainage easement. Address accordingly [303.K.12]* *The Applicant states that the security entrance will be modified contingent upon the final end user. The storm sewer system will be modified appropriately during the final plan so that all pipes are located outside of any permanent security entrance structures.*

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

Sincerely,

Herbert, Rowland & Grubic, Inc.

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

J. Michael Hess, PE
Team Leader