



POCONO TOWNSHIP PLANNING COMMISSION

AGENDA

April 14, 2025 6:00 p.m.

112 Township Drive | Tannersville, PA 18372

CALL TO ORDER

PLEDGE OF ALLEGIANCE

ROLL CALL

PUBLIC COMMENT

For any individuals wishing to make public comment tonight, please state the spelling of your name and identify whether you are a taxpayer of Pocono Township.

CORRESPONDENCE

OLD BUSINESS

- Motion to approve the minutes of the March 10, 2025 meeting of the Pocono Township Planning Commission. **(Action Item)**

SEWAGE PLANNING MODULES:

WAIVERS OF LAND DEVELOPMENT:

SKETCH PLANS

Exclusive Pocono Properties – LDP 1422 (Place Holder)

NEW PLANS

- 2054 Route 611 Minor Subdivision – LDP 1444
- Mountain Edge Village Community Townhouses – LDP 1445

FINAL PLANS UNDER CONSIDERATION

PRELIMINARY PLANS UNDER CONSIDERATION

- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9/24 P.C. meeting with approval deadline of June 2, 2025 **Deadline for P.C. consideration is 5/12/25. (Possible Action Item)**

- Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of May 31, 2025 **Deadline for P.C. consideration is 05/12/25. (Possible Action Item)**
- Swiftwater Solar Revision – (LDP 1375A) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of June 12, 2025 **Deadline for P.C. consideration is 6/9/25. (Possible Action Item)**
 Motion to recommend the Swiftwater Solar Revision Plan Phase B for acceptance by the Board of Commissioners. **(Possible Action Item)**
- Trap Enterprises Event Center – (LDP 1438) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of June 12, 2025 **Deadline for P.C. consideration is 5/12/25 (Possible Action Item)**

Motion to table the following plans **(Action Item)**:

- MCTA Transit Facilities Expansion – (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of June 7, 2025. **Deadline for P.C. consideration is 5/12/25.**
- 1124 Sky View Drive Mono-pine Tower (LDP# 1424) – Plans were administratively accepted at the 4/8/24 P.C. meeting with approval deadline of June 2, 2025. **Deadline for P.C. consideration is 5/12/25.**
- Cranberry Creek Apartments Land Development Plan (LDP# 1369) – Plans were administratively accepted at the 7/25/22 P.C. meeting. Extension letter request received with approval deadline of August 11, 2025. **Deadline for P.C. consideration is 7/14/25.**
- 135 Warner Road – JBAR Pocono LLC (LDP# 1414) – Plans were administratively accepted at the 2/12/24 P.C. meeting. Approval deadline of September 9, 2025. **Deadline for P.C. consideration is 8/11/25.**
- Alaska Pete’s Roadhouse Grille (173 Camelback Road) Land Development Plan (LDP# 1387) – Plans were administratively accepted at the 4/10/23 P.C. meeting. Extension request received with approval deadline of December 31, 2025. **Deadline for P.C. consideration is 12/8/25.**

SPECIAL EXCEPTIONS, CONDITIONAL USE, ET AL, APPLICATIONS

PRIORITY LIST

- Zoning Ordinance, Zoning Map & SALDO Amendments
 - Review process will continue with Nanci Sarcinello, Sarcinello Planning & GIS Services on the 4th Monday of each month.

UNFINISHED BUSINESS

NEW BUSINESS

PUBLIC COMMENT & ADJOURNMENT

POCONO TOWNSHIP PLANNING COMMISSION
Meeting Minutes
March 10, 2025

The regular meeting of the Pocono Township Planning Commission was held on Monday, March 10, 2025 and was opened at 6:00 p.m. by Jeremy Sawicki, Chairman.

ROLL CALL

Joe Folsom, present; Christina Kauffman, present; Claire Learn, present; Chris Peechatka, present; Dennis Purcell, present; Jeremy Sawicki, present; Kyle VanFleet, present.

Planning Commission Alternates: Bruce Kilby, present, Jordan Merring, present.

IN ATTENDANCE

Amy Montgomery, Twp. Engineer; Lisa Perera, Township Solicitor; Krisann MacDougall, Township Asst. Secretary, Jerrod Belvin, Township Manager

PUBLIC COMMENT

Dawn Eilber (Resident) –Clarified her comments from the prior meeting as she felt they were miscommunicated.

CORRESPONDENCE - None

OLD BUSINESS

C. Peechatka made a motion, seconded by C. Kauffman, to approve the minutes of the February 10, 2025 meeting of the Pocono Township Planning Commission. All in favor. Motion carried.

WAIVERS OF LAND DEVELOPMENT - None

SKETCH PLANS - None

NEW PLANS - None

PRELIMINARY PLANS UNDER CONSIDERATION

- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9/24 P.C. meeting with approval deadline of May 8, 2025 **Deadline for P.C. consideration is 4/14/25.**

C. Peechatka made a motion, seconded by C. Kauffman, to recommend a waiver of 390-48.T(13)(a). All in favor, Motion carried.

J. Folsom made a motion, seconded by K. VanFleet, to recommend a waiver of 390-48.W(1). All in favor, Motion carried.

J. Folsom made a motion, seconded by C. Peechatka, to recommend a waiver of 390-50.D(5). All in favor, Motion carried.

D. Purcell made a motion, seconded by C. Peechatka, to recommend a waiver of 390-52.E(4)(i)[1] & [4]. All in favor. Motion carried.

C. Learn made a motion, seconded by C. Kauffman, to recommend a waiver of 390-52.E(6)(d)[6]. All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Peechatka, to recommend a waiver of 390-52.E(6)(d)[9]. All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Peechatka, to recommend a waiver of 390-52.G(1)(b)[8]. All in favor. Motion carried.

K. VanFleet made a motion, seconded by C. Learn, to recommend a waiver of 390-55.B(1). All in favor. Motion carried.

K. VanFleet made a motion, seconded by C. Learn, to recommend a waiver of 390-55.B(1). All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Kauffman, to recommend a waiver of 390-55.C(2)(e). All in favor. Motion carried.

C. Peechatka made a motion, seconded by C. Kauffman, to recommend a waiver of 390-55.D(1)(a). All in favor. Motion carried.

J. Folsom made a motion, seconded by D. Purcell, to recommend a waiver of 390-55.E(3) & 390-50.D(8). All in favor. Motion carried.

C. Learn made a motion, seconded by K. VanFleet, to recommend a partial waiver of 390-55.F(4)(c) & (f). All in favor. Motion carried.

J. Sawicki made a motion, seconded by D. Purcell, to recommend a waiver of 390-59.B. All in favor. Motion carried.

J. Sawicki made a motion, seconded by C. Kauffman, to recommend a waiver of 365-13(b). All in favor. Motion carried.

J. Sawicki made a motion, seconded by J. Folsom, to recommend a waiver of 365-13(D). All in favor. Motion carried.

D. Purcell made a motion, seconded by J. Folsom, to recommend a waiver of 365-8.L. All in favor. Motion carried.

J. Sawicki made a motion, seconded by J. Folsom, to table the plan. All in favor. Motion carried.

- 611 Land Development LLC (LDP #1401) – Dual Brand Hotel – Hotel by Marriot. Plans administratively accepted at the 4/8/24 P.C. meeting. Approval deadline of June 17, 2025. **Deadline for P.C. consideration is 6/9/25.**

D. Purcell made a motion, seconded by C. Peechatka, to recommend a waiver of Section 390-55.F.(1)(a). All in favor. Motion carried.

J. Sawicki made a motion, seconded by J. Folsom, to recommend a waiver of Section 390-55.F. All in favor. Motion carried.

J. Folsom made a motion, seconded by D. Purcell to recommend the subdivision plan for approval to the Board. All in favor. Motion carried.

J. Folsom made a motion, seconded by D. Purcell, to recommend the 611 Land Development Plan #1401 for approval to the Board. All in favor. Motion carried.

- Swiftwater Solar Revision (LDP 1375A) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of June 13, 2025 **Deadline for P.C. consideration is 6/9/25.**

J. Folsom made a motion, seconded by C. Peechatka to recommend Phase “A & D” for approval to the Board of Commissioners. All in favor. Motion carried.

J. Sawicki made a motion, seconded by D. Purcell, to table the remaining phase “B” on the plan. All in favor. Motion carried.

- Trap Enterprises Event Center (LDP 1438) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of April 13, 2025 **Deadline for P.C. consideration is 3/10/25.**

J. Sawicki made a motion, seconded by C. Peechatka, to table the plan. All in favor. Motion carried.

J. Sawicki made a motion, seconded by D. Purcell, to table the following plans listed below. All in favor. Motion carried.

- 1124 Sky View Drive Mono-pine Tower (LDP# 1424) – Plans were administratively accepted at the 4/8/24 P.C. meeting with approval deadline of June 4, 2025. **Deadline for P.C. consideration is 5/12/25.**
- MCTA Transit Facilities Expansion (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of June 3, 2025. **Deadline for P.C. consideration is 5/12/25.**
- Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of May 31, 2025. **Deadline for P.C. consideration is 05/12/25.**
- Cranberry Creek Apartments (LDP# 1369) – Plans were administratively accepted at the 7/25/22 P.C. meeting. Extension letter request received with approval deadline of August 4, 2025. **Deadline for P.C. consideration is 7/14/25.**
- 135 Warner Road – JBAR Pocono LLC (LDP# 1414) – Plans were administratively accepted at the 2/12/24 P.C. meeting. Approval deadline of September 9, 2025. **Deadline for P.C. consideration is 8/10/25.**
- Alaska Pete’s Roadhouse Grille (173 Camelback Road) (LDP# 1387) – Plans were administratively accepted at the 4/10/23 P.C. meeting. Extension request received with approval deadline of December 31, 2025. **Deadline for P.C. consideration is 12/8/25.**

PRIORITY LIST

- Zoning Ordinance, Zoning Map & SALDO Amendments
 - The review process will continue with Nanci Sarcinello, Sarcinello Planning & GIS Services on the 4th Monday of each month (**March 24th will be our next meeting.**)

PUBLIC COMMENT

E. Gnant – Commented on one of the engineering letters missing from the packet to the P.C. on Swiftwater Solar.

J. Folsom made a motion, seconded by D. Purcell, to adjourn the meeting at 7 p.m. All in favor. Motion carried.

- 1) Owner: Percidani Family, LLC
- 2) Date: 12/25/2023
- 3) Total Area: 43.21 Acres
- 4) Fraction and the location of Parcel shown on map and adjacent parcels are shown on map.
- 5) The Map Parcel: (24.43/43.21) = 56.5%
- 6) Under no circumstances shall this map be used to create any new parcels or to change the boundaries of any parcels shown on this map.
- 7) The owner hereby certifies that the information shown on this map is true and correct.
- 8) The owner hereby certifies that the information shown on this map is true and correct.
- 9) The owner hereby certifies that the information shown on this map is true and correct.
- 10) The owner hereby certifies that the information shown on this map is true and correct.
- 11) The owner hereby certifies that the information shown on this map is true and correct.
- 12) The owner hereby certifies that the information shown on this map is true and correct.
- 13) The owner hereby certifies that the information shown on this map is true and correct.
- 14) The owner hereby certifies that the information shown on this map is true and correct.
- 15) The owner hereby certifies that the information shown on this map is true and correct.
- 16) The owner hereby certifies that the information shown on this map is true and correct.
- 17) The owner hereby certifies that the information shown on this map is true and correct.
- 18) The owner hereby certifies that the information shown on this map is true and correct.
- 19) The owner hereby certifies that the information shown on this map is true and correct.
- 20) The owner hereby certifies that the information shown on this map is true and correct.

LDP#

1445

Pocono Township



Symbol	Description
[Symbol]	Tract Boundary
[Symbol]	Adjacent Parcel Boundary
[Symbol]	Water Feature
[Symbol]	Spot Elevation
[Symbol]	Contour Line
[Symbol]	Property Line
[Symbol]	Building
[Symbol]	Other Structure
[Symbol]	Utility Line
[Symbol]	Other Feature



Boundary Survey Map of Ski Side Village
 Pocono Township, Monroe County, Pennsylvania
 PREPARED BY:
Percidani Family, L.P.
 PREPARED BY:
BRIAN D. COURFRAIGHT, P.L.S.
 A PROFESSIONAL LAND SURVEYOR
 LICENSE NO. 10074-000-0000
 STATE OF PENNSYLVANIA

SCALE: 1"=100'
 DATE: 12/25/2023
 DRAWN BY: B.C.
 JOB NO. 2008-145
 CHECKED BY: B.C.
 SHEET 1 OF 1



March 24, 2025

VIA ELECTRONIC MAIL

Jerrold Belvin, Secretary
Pocono Township
112 Township Drive
Tannersville, PA 18372
jbelvin@poconopa.gov

Re: Approval Letter - Revision
Act 537 Planning
Brookdale Spa
2 Lots / 28,550 GPD
DEP Code No: 2-45913510-3
APS NO: 1122566; AUTH ID NO: 1501114
Pocono Township, Monroe County

Dear Jerrod Belvin:

The Department of Environmental Protection (DEP) has reviewed the above referenced proposed Official Plan revision. The proposed development is located at 2436 Back Mountain Road in Pocono Township, Monroe County.

The proposed project consists of the reallocation sewage flows between two (2) existing parcels served by the Brookdale Resort Wastewater Treatment Facility (BRWWTF). Prior sewage facilities planning approved on May 24, 2018, allocated 26,500 GPD to Lot #1 (91.4 acres) - an existing drug and alcohol rehabilitation center (currently operational) and 2,717 GPD to Lot #2 (31.6 acres) - a proposed restaurant use (currently not constructed). This proposal intends to reallocate 10,000 GPD to Lot #1, the existing drug and alcohol rehabilitation center based on existing water-meter data and needs, and 18,550 GPD to Lot #2, a new proposed 39,000 square foot health and wellness Spa building. A proposed sewage pump station will be constructed, and sewer lateral will be extended from Lot 2 to the BRWWTF. Water will be provided by a proposed individual well. The BRWWTF is permitted for an Annual Average Flow of 49,000 GPD.

It is also an existing plan that the treatment facility will serve a third lot (Lot 3 – 21.0 acres) – an existing 44-unit hotel and 8-multifamily units currently served by an existing on-lot sewage disposal system permitted to treat 9,975 GPD – in the event of a malfunction of the on-lot sewage disposal system serving the lot. When the proposed sewer lateral serving Lot 2 is installed between Lot 2 and the BRWWTF, an additional lateral pipe will be installed for future direct connection of Lot 3 to the BRWWTF.

In addition to the three lots (Lots 1, 2 and 3) currently being served or planned to be served, the treatment facility is currently providing sewage disposal service for an existing single-family

dwelling located at 232 Dyson Road, treating 263 GPD of sewage flows. Each lot served by the BRWWTF will have separate sewage conveyance system and connection from the site (lot) to the BRWWTF.

The plan revision is approved with the following comments:

PROJECT SPECIFIC COMMENTS

1. The Safe Drinking Water Act of Pennsylvania mandates that a permit from DEP is required prior to the construction or modification of a public water system, except for waterline extensions. Contact the regional office of the Safe Drinking Water Program regarding permit requirement.
2. Other DEP permits may be required for construction if encroachment to streams or wetlands will result. Information regarding the requirements for such permits or approvals can be obtained from DEP's Waterways and Wetlands Program at the letterhead address or by telephone at 570.826.2511.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY

TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions or concerns, please contact Todd Stires, Sewage Planning Specialist, at 570.895.4049 and reference DEP Code No: 2-45913510-3, APS ID# 1122566, AUTH# 1501114.

Sincerely,

Amy M. Bellanca

Amy M. Bellanca, P.E.
Environmental Program Manager
Clean Water Program

cc: Robert Hackenberg, Manager\Brookdale Enterprises, LLC
Nathan S. Oiler, P.E.\RKR Hess, a division of UTRS, Inc.
Krisann MacDougall, Secretary\Pocono Township Planning Commission
Christine Meinhart-Fritz\Director\Monroe County Planning Commission



April 4, 2025

Via Email: rhackenberg@nefgcapitalpartners.com

Bob Hackenberg
Brookdale Enterprises, LLC
PO Box 531
Tannersville, PA 18372

Re: Technical Deficiency Letter
Brookdale Spa
NPDES Permit Application No. PAD450218
Pocono Township, Monroe County

Dear Applicant:

The Monroe County Conservation District has reviewed the above referenced application and has identified the technical deficiencies listed below. The *Pennsylvania Erosion and Sediment Pollution Control Program Manual* (E&S Manual) and the *Pennsylvania Stormwater Best Management Practices Manual* (BMP Manual) include information that may aid you in responding to some of the deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's established means of satisfying the applicable regulatory and statutory requirements.

Technical Deficiencies

1. ***§102.4(b)(5)(vi) A narrative description of the location and type of perimeter and onsite BMPs used before, during and after the earth disturbance activity.***
 - a. Stage 1: Please add a compost filter sock near Endwall B-46. The trenching activities along the pipe run from B42 to B46 will result in a corridor of earth disturbance along the pipe, perpendicular to the slope. Please review the other pipe runs and add additional socks where appropriate.
 - b. Stage 1: A detail should be provided for the haul road installation. In addition, E&S BMP's, such as water bars, turnouts etc. should be incorporated into the haul road construction to handle runoff during construction, most notably where the haul road is being constructed in perpendicular to steep slope areas.
 - c. Stage 1: it is unclear how runoff from the haul road and upstream area above Inlet 4-17 will be conveyed into the storm system and to Sediment Trap 1. Please indicate how runoff will be conveyed to the trap prior to, during, and after fill placement in the area near this storm system.

2. ***§102.4(b)(5)(vii) A sequence of BMP installation and removal in relation to the scheduling of earth disturbance activities, prior to, during and after earth disturbance activities that ensure the proper functioning of all BMPs.***
- a. The following comments relate to Stage 1 of the sequence of construction:
 - i. In general, the sequence should include a more detailed breakdown of the steps of the sequence to take into account concurrent activities. For example, Steps 1, 9 and 10 should be rewritten as steps 1.a, 1.b and 1.c to signify they are being constructed at the same time.
 - ii. The sequence does not address the clearing and grubbing of the site. The sequence should specify the limits of clearing and grubbing to be performed for each step of the sequence.
 - iii. Please reference the utility line installation sequence for steps where sanitary and stormwater piping is being installed.
 - iv. Please identify the compost socks with a number or other designation and incorporate this into the sequence.
 - v. Sediment Trap 1 and the lower section of the haul road near sediment trap 1 require fills for construction. Therefore, the haul road from the borrow area needs to be established prior to construction of the sediment trap and haul road fills. Please revise the sequence.
 - vi. The sequence does not address the installation of Swale B-17BN, B-17BS-4 and B-17BS-6 and the piping system from B-16 to B-16B. These features should be installed early in the sequence (prior to trap 1 construction) in order to divert upstream runoff around the work area. The compost socks below Trap 1 are sized based on the diversion being installed.
 - vii. For all swales, the sequence should specify the swale should receive topsoil, seed mulch and matting once the swales are constructed.
 - viii. Step 3 references Swale B17N. This swale is not shown on the plans. Please clarify.
 - ix. Steps 4 and 5 should include the placement of topsoil, seeding, mulch and erosion control blankets along the finish grade steep slope sections.
 - x. Step 6 notes to install compost socks concurrently with haul road construction. Socks should be installed prior to grubbing and establishment of the haul road.
 - xi. Step 6 notes to “establish” the fill placement area. Please clarify what is being established. A compost sock for Sediment Trap 2 is shown within the fill placement area.
 - xii. Step 7 should include the blocking off of inlets 4-15-2 to 4-15-7, and the installation of compost sock , berms and erosion control matting along the bypass piping system. Please review other pipe run and identify where the

temporary blocking of pipes I required.

- xiii. Step 8: Please change the diversion “swales” to diversion “socks”.
 - xiv. Step 9 should be revised to note construction access to the Stockpile, Staging and Borrow areas, not to the ‘Top of Site’.
- b. The following comments relate to Stage 2 of the sequence of construction:
- i. Please incorporate the comments above regarding concurrent steps, swales, socks, trenching, etc. into the Stage 2 sequence.
 - ii. Step 11 notes to install the compost socks below the employee housing area (18” sock). This sock should be installed after the construction of Basin 1. Please revise.
 - iii. Step 12: Basin 1 construction should include the installation of topsoil, seed and erosion control blankets on the finish slopes. Grading of the employee housing area should include the requirements to maintain sheet flow to the compost sock above basin 1. This area should not be diverted to sediment trap 3. The storm system conveying flows into the basin should be sealed. In addition, please specify whether the amended soils will be placed in the basin at this step or added at a later time.
 - iv. Step 13: It is unclear why the pipe from inlet B-33-1 to B-33 is not being installed at this time (pipe not shown on the plan). This pipe installation is not addressed later in the sequence. Please revise. The pipe should be blocked at the flow splitter until the contributing drainage area I stabilized.
 - v. Step 14: Please include installation of topsoil, seed and erosion control blankets on the sediment trap berm. Please revise diversion “swales” to diversion “socks”.
 - vi. Step 15, roadway construction: Please include the installation of compost socks below the roadway in this step. In addition, as the pipe system is installed in the roadway, please specify how runoff from the roadway area will be conveyed to the inlets and sediment trap 1 (watebars, etc.) Subbase should be installed on the roadway areas and blankets along the slope areas as the roadway is brought to grade.
 - vii. Please indicate in the sequence when the temporary haul roads should be removed and the new access road utilized for construction traffic.
- c. The following comments relate to Stage 3 of the sequence of construction:
- i. Please incorporate the comments above regarding concurrent steps, swales, socks, trenching, etc. into the Stage 3 sequence.
 - ii. Step 17: This step needs to be further subdivided into various steps, generally following the sequence provided below:
 - 1. Installation of outlet piping for Bed 2.
 - 2. Installation of Bed 2, including infiltration testing of subgrade soils. (Critical stage). This step should refer to the PCSM

construction sequence on the PCSM plans.

3. Installation of storm piping into Bed 2, with inlets sealed or left above grade until final paving is completed.
 4. Completion of parking area and installation of subbase material.
- iii. Steps 18-21: Please remove the statement “as construction permits” from these steps. Please specify the conditions required for removal/conversion of the sediment traps.
 - iv. Step 18: Please indicate in this step how the runoff from the roadway and areas upslope of the road will be stabilized or conveyed to Trap 1, allowing for the removal of trap 3.
 - v. Step 19: Please specify that the storm system from B-25 to B-22 needs to be completed prior to plugging the temporary pipe
 - vi. Step 20: This step should note that the areas above the berm location need to be stabilized, and the berm installed prior to the removal of Trap 2. In addition, this step should reference the Trap 2 temporary pipe, not Trap 3. Please extend the berm to the southern limit of the parking area.
 - vii. Step 20: Once trap 2 is removed, the storm system from 4-15-7 to 4-15-10 should be installed as the lower parking area is built where trap 2 was previously located. The pipe from inlet 4-15-8A to 4-15-8 needs to be sealed until trap 1 is converted. Fills for the slopes below the parking areas should receive topsoil, seed, mulch and slope blankets.
 - viii. Step 21: please specify flushing of the storm pipe system prior to converting trap 1. In addition, please provide a detailed sequence for the conversion of the basin, including removal of temporary outlet structures, removal of sediment, grading of the bottom of the basin and infiltration testing of the subgrade soils as part of the conversion. This step should refer to the PCSM construction sequence on the PCSM plans.

3. §102.4(b)(5)(viii) Supporting calculations and measurements.

- a. Module 1, Item 18: Please address how thermal impacts are being minimized during construction. The current answer discusses post construction thermal impacts.
- b. The compost sock calculations are difficult to follow since terms such a “Remove upper trap 3”, “below middle trap”, “construct lowest sediment trap”, etc. are being utilized. Please provide compost sock numbers on the plans and coordinate the numbering system with the calculations.
- c. Please identify and check the compost socks below Basin 1 (12”). The sizing does not appear correct since an upstream sock (above Basin 1) is 18” in size.
- d. Sediment Traps 1 and 2 discharge to EV Wetlands. Sediment traps with perforated risers are ABACT BMP’s for HQ waters only. These traps need to be redesigned utilizing a skimmer to meet ABACT requirements for EV waters.

- e. Trap 1 has been designed with a bottom elevation of 1210.00, which is the same bottom elevation when the basin is converted to an infiltration basin. The sediment trap bottom elevation should be a minimum of one (1) foot higher in order to preserve the infiltration capabilities of the soils. Please revise.

4. §102.4(b)(5)(ix) Plan drawings.

- a. Please identify the outlet structure for Trap 1 on the plans.
- b. Stage 2 E&S Plans: Please show the grading being conducted above sediment traps 2 and 3 in this phase of construction.
- c. A rock filter should be shown around each outlet structure for Basin 1 and 4 on the Stage 2 (Basin 1) and Stage 3 (Basin 4) plans. Please specify that the rock filter should remain in place until the bottom of the basin is stabilized.
- d. Please specify the minimum functional longevity of the compost filter socks.
- e. Please specify the staple pattern to utilize on the lining for the diversion socks. In addition, please specify how the area between the sock and the lining will be sealed off so that runoff does not flow under the compost sock.
- f. Construction fencing should be provided at the wetland boundaries where work is being performed adjacent to the wetlands. Please show the fencing on the plan and provide a construction detail.
- g. Please add a prominent note to the E&S Plan drawings that sheet flow shall be maintained to the compost filter socks. If concentrated flow or overtopping occur, a rock filter outlet shall be installed at the location of the concentration/overtopping.
- h. The impervious liner for Basin 4 should be shown in the Trap 1 embankment detail(s).

5. §102.6(a)(1) Submit to the Department or a conservation district a complete application or NOI, an E&S Plan meeting the requirements of § 102.4 (relating to erosion and sediment control requirements), a PCSM Plan meeting the requirements of § 102.8 (relating to PCSM requirements), and other information the Department may require.

- a. Please update the Application, Module and supporting information (as applicable) as a result of addressing the comments in this letter.

6. §102.8(f)(5) An identification of the location of surface waters of this Commonwealth, which may receive runoff within or from the project site and their classification under Chapter 93 (relating to water quality standards).

- a. The earth disturbance for the proposed sanitary sewer line along Dyson Road appears to discharge to “Brookdale Lake to Scot Run”. A discharge point for this work should be added to the NPDES Application and rate, volume and water quality compliance should be shown for this discharge point. It appears the work would qualify as a site restoration activity.
- b. A small wetland is shown along Dyson Road. If the earth disturbance associated with the sanitary sewer line will discharge to this wetland, then a discharge point

for this work should be added to the NPDES Application and rate, volume and water quality compliance should be shown for this discharge point. It appears the work would qualify as a site restoration activity.

- c. The following comments pertain to the Wetland Report:
 - i. A soils data sheet has not been provided for Sampling point 7D in the wetland report. Please provide.
 - ii. A vegetation data sheet has not been provided for Sampling Point 410F in the wetland report. Please provide.
 - iii. The wetland/stream mapping shown in the wetland report does not match the wetland/stream boundaries provided on the PCSM and E&S plans. Please explain and/or revise this discrepancy.
 - d. The following comments pertain to the Wetland Impacts Report:
 - i. The Engineering Design section of the report discusses the stormwater volume into the various wetlands from the surface runoff from the project. The report notes that the wetlands are groundwater-fed. Please include a discussion and conclusion on how the project will affect the groundwater contribution to the various wetlands.
 - ii. Please discuss the type of vegetation within the wetlands and whether the project will affect vegetation in the wetlands.
 - iii. The project includes clearing of forested areas upstream and adjacent to some of the wetlands. Please discuss and provide a conclusion on potential thermal impacts to the wetlands from clearing operations.
7. ***§102.8(f)(7) A sequence of PCSM BMP implementation or installation in relation to earth disturbance activities of the project site and a schedule of inspections for critical stages of PCSM BMP installation.***
- a. The PCSM Construction Sequence for the PCSM BMP's is general in nature and should be revised to be specific to the BMP's being installed, including liner and amendment placement in Basin 1, installation of subsurface units in Bed 2, and liner placement in Basin 4.
 - b. Please provide any specific measures that should be utilized during construction to maintain the infiltration capabilities of the bottom of the infiltration facilities.
 - c. Please incorporate infiltration testing into the PCSM sequence for Beds 2 and Basin 4. A minimum of two tests should be performed in Bed 2 and three tests in Basin 4 on the subgrade soils of the infiltration facilities. Please submit the results to MCCD.
 - d. The Vegetated Swale construction sequence should include the infilling of the permanent erosion control matting with topsoil, and installation of a degradable blanket over the permanent matting if the establishment of vegetation become problematic.
8. ***§102.8(f)(8) Supporting calculations.***

- a. Please make the following revisions to the Module 2 forms:
- i. The answer to question #7 (thermal impacts) for all discharge points should be clarified. The response provided states that “thermal impacts mitigated” but does not explain how the mitigation is being accomplished. Please expand upon your answer.
 - ii. DP001, Stormwater Analysis-Runoff Volume: Please uncheck item #1 (the volume standard for design is not an Act 167 volume requirement). A similar revision is required for DP 003 and DP 004.
 - iii. DP 002: Please remove BMP’s 1 and 3 from the BMP list (Sweeping and WQ Filters) from the BMP list, since these BMP’s are not being utilized for water quality compliance.
 - iv. DP 002, Infiltration Information: Testing results for TP 23 should be the only values reported in this section, since the infiltration testing performed in other test pits was above the bottom elevation of the infiltration bed.
 - v. DP 003: Please remove BMP 1 (Revegetate with Native Species) from the BMP list. The use of native species (meadow) is taken into account on the PCSM Spreadsheet when determining water quality compliance.
 - vi. DP003, Stormwater Analysis-Peak Rate: Please remove the flow splitter data in item 8.
 - vii. DP 004: Please remove BMP #2 (WQ Filters) from the BMP list since this BMP is not being credited for water quality compliance in this discharge point.
 - viii. DP 004, Infiltration Information: Information should be provided in this section for testing associated with Test Pits 8 and 2 for the results located within 2 feet below the bottom of the infiltration basin.
- b. Please make the following revisions to the Downstream Analysis:
- i. DP 001: Please provide predevelopment and post development rate values for the discharge along the existing stone wall, existing swale and the roadside swale along Back Mountain Road.
 - ii. DP 001: Please provide photographs verifying the drainage paths are stable for the existing stone wall, existing swale, roadside swale and the drainage path below the existing pipe, verifying the drainage paths are currently stable. Please comment on whether these paths will remain stable upon project completion. In addition, the culvert calculation for Pipe 1 indicates an outlet velocity of 9.02 cfs. Please provide photographs of whether an apron exists at the pipe discharge location.
 - iii. DP 002: Please provide photographs verifying the drainage path below Pipe 2 verifying the drainage path is currently stable.
 - iv. DP 003: Please provide predevelopment and post development rate values for the discharge along the roadside swale along Back Mountain Road.

- v. DP 003: It appears that there is an existing culvert directly below the new DP 003 discharge point. Flows which previously were conveyed to the existing DP 003 point will now be introduced into the stream directly above this culvert. No information is provided on this culvert. Please discuss the predevelopment vs post development flows to this culvert and whether there are changes to the performance of this culvert.
 - vi. DP 003: Please provide photographs verifying the roadside swale along Back Mountain Road is currently stable.
 - vii. DP 002 or DP 003: A pipe system is proposed in the existing roadway to be removed (Inlets B-30 to the flow splitter). There is a stone wall along the south of the existing road this area which is scheduled to remain, which is acting as swale cutting off flows from the proposed lawn area. The stone wall area should be analyzed to determine whether this flow path is currently stable and photographs provide for this conveyance path.
- c. The following comments apply to the level spreader calculations:
- i. MCCD questions the need for the level spreader, since the stone wall directly below the spreader is concentrating flows adjacent to the wall, which then discharges to a series of existing swales to the discharge point. Please justify why a level spreader is required in lieu of creating a swale along the wall.
 - ii. The allowable design velocity for a permanent level spreader should be 33% or less than the allowable design slope velocities (1.33 fps). Please indicate the actual velocity over the lip of the level spreader.
 - iii. Please provide calculations for the perforated pipe, indicating the perforations are able to distribute the flow through the level spreader and the anticipated velocity through the perforations.
- d. The allowable shear stress (1.0 psf) for Swale B-1 is exceeded for a vegetated swale. In addition, NAG computer printouts have not been provided, indicating whether the S75 lining is appropriate for this swale. Please provide the NAG printout and redesign the swale and/or lining.
- e. Swales B-17BS-4 and B17BS-6 are noted in the swale calculations as temporary swale. It appears these swales are permanent. Please revise.
- f. There are various inconsistencies in the NAG computer printouts for the swales versus the swale design worksheets. A printout has not been provided for Swale B-1. Please check the naming and discharge values for swales B-16BN (no swale with this designation), B-16BS (name designation), B-21 (discharge value), B-1 (discharge value), and B-26 (discharge value).
- g. Swale B-17 was designed for 46.0 cfs, while the rock apron for this point is designed for 29.2 cfs. Please revise the apron design value to be consistent with the swale.
- h. Swales B-2 and B29D are proposed as triangular swales. It is difficult to create

adequate contact and anchoring of erosion control matting in triangular swales. Please consider a trapezoidal swale for these locations.

9. §102.8(f)(9) Plan drawings.

- a. Please label the swales on the PCSM plan drawings.
- b. Please identify the discharge point below headwall B-35 as DP 003.
- c. A label is provided for Test Pit 22 within Bed 2 but no test pit is shown. Please revise.
- d. Please show the anti-seep collars on the PCSM Plan drawing.
- e. Please provide notes or other designations indicating where the roof drains from the various buildings should connect to the site storm system.
- f. The calculations for the anti-seep collars for Basin 1 indicate 6 collars are required. Four (4) collars are shown on the profile for this discharge pipe. Please revise for consistency.
- g. Please make the following change to the level spreader detail:
 - i. Please refer to other comments in this letter regarding the suitability of a level spreader.
 - ii. The concrete wall for the level spreader should be constructed below the anticipated frost level (42" minimum). Please revise.
 - iii. The level spreader notes (Note 2) note to fine grade below the level spreader lip a minimum of 10 feet. The S75 matting should extend the entire area of the lip regrading.
 - iv. Please specify requirements for the perforations in the perforated pipe (size, number and spacing).
- h. The Stilling Basin detail is missing information for the riprap depth at B35. Please add this information.
- i. Basin 1 is shown with an underdrain and a knife gate valve. The gate valve should be removed and a solid cap provided on the underdrain. In addition, please add notes that the MCCD shall be contacted prior to removal of the cap for maintenance purposes. Once maintenance is performed the solid cap should be reinstalled.
- j. Please show the emergency spillway on the Basin 1 Embankment Detail.
- k. Please show the spillway on the Basin 4 Embankment Detail.
- l. The Basin 4 outlet structures are proposed as 2'x2' inlet boxes. Please consider the use of a standard inlet box (2'x4') to facilitate cleaning and maintenance of the facility.
- m. Please remove the StormBrixx standard details for a Detention system installation. Some of the requirements conflict with the Infiltration details (such as the use of an impermeable liner).

10. §102.8(f)(10) A long-term operation and maintenance schedule, which provides for inspection of PCSM BMPs, including the repair, replacement, or other routine maintenance of the PCSM BMPs to ensure proper function and operation. The program must provide for completion of a written report documenting each inspection and all BMP repair and maintenance activities and how access to the PCSM BMPs will be provided.

- a. The operation and maintenance (O&M) of the Dry Extended Detention Basin should include inspection and replacement of plug plantings, and O&M provisions for the amended soils. Please expand upon the O&M requirements.
- b. Please include provisions for contacting MCCD prior to the use of the underdrain for draining the basin, as outlined in previous comments.
- c. Please include a requirement to maintain a log of street sweeping operations and provide the log to MCCD if requested.
- d. Please include mowing/maintenance instructions for the meadow management areas. Meadow areas need to be maintained at a higher height to promote establishment of the meadow areas. Our experience is that meadow areas are frequently mowed to grass height, limiting growth.
- e. The level spreader O&M requirements should include monitoring of the area downstream of the spreader and identification/ repair of concentration flow areas and associated erosion.

11. §102.8(g)(1) Predevelopment site characterization and assessment of soil and geology including appropriate infiltration and geotechnical studies that identify location and depths of test sites and methods used.

- a. Please provide the infiltration testing data sheets, indicating how the final infiltration rates were determined.

12. §102.8(g)(2) Analysis demonstrating that the PCSM BMPs will meet the volume reduction and water quality requirements specified in an applicable Department approved and current Act 167 stormwater management watershed plan; or manage the net change for storms up to and including the 2-year/24-hour storm event when compared to preconstruction runoff volume and water quality:

- a. PCSM Spreadsheet, DP 002, Volume Tab: The disturbed area from Subarea 50S (Total DP 003-In&Out of LED-Piped) should be included in the DP 002 post construction conditions when determining the volume reduction requirement. This area is conveyed to the flow splitter. In addition, the majority of flows up to and including the 2-year storm is directed toward DP 002, including small “first flush” type storm which would convey pollutants to DP 002. Please revise.
- b. PCSM Spreadsheet, DP 002, Volume Tab: The Infiltration/Vegetated Area for BMP 2 should be the bottom area of the facility, or 2,931 sf. Please revise
- c. PCSM Spreadsheet, DP 003, Volume Tab: Please remove the disturbed areas from subarea 50S from the post development condition a noted in the above comment,

- d. PCSM Spreadsheet, DP 003, Volume Tab: In the predevelopment condition, the Forest-C value should equal 3.43 acres to match the disturbed area value from the rate analysis (not including change from removing subarea 50S).
- e. PCSM Spreadsheet, DP 003, Volume Tab: In the predevelopment condition, the Meadow-C value should equal 0.11 acres to match the disturbed area value from the rate analysis (not including change from removing subarea 50S).
- f. PCSM Spreadsheet, DP 003, Volume Tab: In the predevelopment condition, the impervious land cover should be a "gravel" impervious surface to match the values from the rate analysis.
- g. PCSM Spreadsheet, DP 003, Water Quality: Please remove the pollutant reductions for the "Revegetate with Native Species" BMP. This BMP is taken into account when calculating the required reductions on the PCSM Spreadsheet (meadow area cancel each other out in the pre and post conditions).
- h. PCSM Spreadsheet, DP 003, Water Quality: The pollutant reduction percentages for the snouts should be based on manufacturers or published data on the pollutant reductions. The value for TSS, TP and TN should be 50%, 36% and 0% respectively.
- i. PCSM Spreadsheet, DP 004, Volume Tab: In the predevelopment condition, the Forest-C areas should total 3.60 acres, and the Meadow-D value should total 2.17 acre in order to match the rate analysis.
- j. PCSM Spreadsheet, DP 004, Volume Tab: In the post development condition, the Meadow-A should total 1.56 acres, the Meadow-D should total 1.57 acres, The Meadow-D should total 2.86 acres, the Grass-C should total 1.02 acres, the Meadow-D should total 1.52 acres and the impervious areas should total 4.47 acre in order to match the rate analysis.
- k. PCSM Spreadsheet, DP 004, Volume Tab: It appear the main access road to the site was modelled as "Impervious-Paved Parking Lot, Roof, Driveways, Etc.". The main access road should be modelled as "Impervious-Streets and Roads-Paved, Curbs and Storm Sewers" to accurate model the pollutant loadings.
- l. PCSM Spreadsheet, DP004, Volume Tab: The Infiltration/Vegetated Area should be the bottom area of the basin (17,121 sf). Please revise.
- m. Please provide calculations that the drainage area and/or allowable flow values for the Snouts are in accordance with the manufacturers' recommended values.
- n. Dry Extended Detention Basin 1 is being utilized for Evapotranspiration (ET) credits. In accordance with the PCSM Spreadsheet instructions, in order to qualify for ET credits, vegetation must include plug planting with a mix of native woody, herbaceous, and grass species. Seed mixes may be used in addition to plug plantings but must not be the only form of vegetation planted to qualify for ET credit. Grasses may be used, but may not be the only species planted, because other species with deeper penetrating root systems are needed to achieve the infiltration and ET credits calculated by the spreadsheet. Please incorporate plug plantings into the basin.

- 13. §102.8(g)(3) Analysis demonstrating that the PCSM BMPs will meet the rate requirements specified in an applicable Department approved and current Act 167 stormwater management watershed plan; or manage the net change in peak rate for the 2-, 10-, 50-, and 100-year/24-hour storm events in a manner not to exceed preconstruction rates.**
- a. Please check the Infiltration Bed 2 Storage Data. It appears from the plans that a total of 33 300SD half units are being provided in this bed at elevation 1335.50. It appears only one unit is being provided in the storage data for the bed. Please review and revise if required.
 - b. Subareas 50S and 55S both contain disturbed and undisturbed areas. Please provide out a segregation of the disturbed vs undisturbed areas, and adjust the PCSM Spreadsheets accordingly.
 - c. For Subareas 50S and 55S, it is difficult to determine where the dividing line between these 2 areas lies along the pipe system which is located in the existing roadway to be removed (Inlets B-30 to the flow splitter). In addition, there is a stone wall along the south of the existing road this area which is scheduled to remain, which is acting as swale cutting off flows from the proposed lawn area. It is unclear whether the analysis assumes this runoff enters the flow splitter or is conveyed to the existing DP003 cross pipe. Please clarify. The stone wall area should be analyzed to determine whether this flow path is currently stable as discussed previously.
- 14. §102.8(h)(1) Evaluate and include nondischarge alternatives in the PCSM plan unless a person demonstrates that non discharge alternatives do not exist for the project.**
- a. Several revisions are required to Module 3. A markup of Module 3 is attached to this review letter.
- 15. §102.8(k) Licensed professional oversight of critical stages. A licensed professional or a designee shall be present onsite and be responsible during critical stages of implementation of the approved PCSM Plan. The critical stages may include the installation of underground treatment or storage BMPs, structurally engineered BMPs, or other BMPs as deemed appropriate by the Department or the conservation district.**
- a. Please update the Critical Stages of Construction notes to include the preparation of a written report and photographs documenting the critical stage oversight. The report and photographs should be provided to MCCD if requested.
- 16. §102.14 Riparian buffer requirements (and Act 162):**
- a. Module 4, Second Section (Allowable Activities): Please check the “water obstructions and encroachments” checkbox in this section.
- 17. The fee for service the next submittal is \$3,550.00, payable to “Monroe County Conservation District”. §102.6(b)(3)**

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 30 calendar days from the date of this

letter, on or before **May 4, 2025** or DEP or the District may deny or withdraw the application. Alternatively, you may consider voluntary withdrawal.

Your response must be submitted to the District using the same method of submission as was used for the original application.

Please be advised that if your response does not satisfy the technical deficiencies, in general your application will proceed to an Elevated Review. If you do not believe the technical deficiencies can be fully addressed within the required timeframe, you should consider a voluntary withdrawal. If a permit application is denied, there is no recovery of fees available; however, if you voluntarily withdraw the application and then submit a new application for the same project, previously paid disturbed acreage fees will be reapplied to the new application.

If you believe that any of the stated deficiencies are not significant, instead of submitting a response to that deficiency, you have the option of requesting that the District make a permit decision based on the information you have already provided regarding the subject matter of that deficiency. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency.

If you have questions about your application, please contact me by e-mail at mwilk@monroecountypa.gov or by telephone at 570.629.3060 and refer to Application No. PAD4501118, to discuss your questions or to schedule a meeting. Any such meeting must be held within the deficiency correction period.

Sincerely,

Michael J Wilk

Michael J. Wilk, PE
Hydraulic Engineer
Monroe County Conservation District

ecc: Nicholas DeFrank PE, RKR Hess, a Division of UTRS, Inc.
DEP-NERO
Pocono Township



**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGES OF STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES
 ANTIDEGRADATION ANALYSIS MODULE 3**

Applicant: Brookdale Enterprises, LLC

Project Site Name: Brookdale Spa

Surface Water Name: Scot Run

Surface Water Use: HQ-CWF, MF

ANTIDEGRADATION – EROSION AND SEDIMENT CONTROL (E&S) PLAN

A **Non-Discharge Alternative will be utilized** for the project that will either individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

Identify the E&S BMP(s) that will be utilized to achieve the non-discharge alternative:

- | | |
|--|---|
| <input type="checkbox"/> Alternative Siting: Location | <input checked="" type="checkbox"/> Limiting Extent & Duration of Disturbance |
| <input type="checkbox"/> Alternative Siting: Configuration | <input type="checkbox"/> Riparian Buffer (150 ft min.) |
| <input type="checkbox"/> Alternative Siting: Location of Discharge | <input type="checkbox"/> Riparian Forest Buffer (150 ft min.) |
| <input type="checkbox"/> Other: _____ | <input checked="" type="checkbox"/> Limited Disturbed Area |

Explain how the E&S BMP(s) will individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

If a **Non-Discharge Alternative will not be utilized**, explain the rationale for non-selection, including why none of the alternatives are considered environmentally sound and cost-effective.

The client owns no other appropriate site. The discharge points will be essentially unchanged. The disturbed area will be limited to only the area that is needed. The discharge to Scot Run will be maintained.

Antidegradation Best Available Combination of Technologies (ABACT) BMP(s) will be utilized for the project that will either individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

Identify the ABACT E&S BMP(s) that will be utilized:

- | | |
|---|--|
| <input type="checkbox"/> Rock Construction Entrance with Wash Rack | <input type="checkbox"/> Rock Construction Entrance with Street Sweeping |
| <input type="checkbox"/> Wheel Wash | <input type="checkbox"/> Pumped Water Filter Bag with Compost Sock Ring |
| <input type="checkbox"/> Pumped Water Filter Bag with Sump Pit | <input checked="" type="checkbox"/> Compost Filter Sock |
| <input type="checkbox"/> Compost Filter Berm (HQ Only) | <input type="checkbox"/> Weighted Sediment Filter Tube (HQ Only) |
| <input type="checkbox"/> Silt Fence with Vegetative Filter Strip | <input type="checkbox"/> Super Silt Fence with Vegetative Filter Strip |
| <input type="checkbox"/> Wood Chip Filter Berm (HQ Only) | <input type="checkbox"/> Vegetative Filter Strip (HQ Only) |
| <input type="checkbox"/> Sediment Basin with Perforated Riser (HQ Only) | <input type="checkbox"/> Sediment Basin with Skimmer |
| <input type="checkbox"/> Stone Inlet Protection with Compost Layer (HQ Only) | <input type="checkbox"/> Compost Filter Sock Sediment Trap |
| <input checked="" type="checkbox"/> Embankment Sediment Trap with Compost Layer (HQ Only) | <input type="checkbox"/> Embankment Sediment Trap with Compost Sock |
| <input checked="" type="checkbox"/> Sediment Trap with Perforated Riser (HQ Only) | <input checked="" type="checkbox"/> Sediment Trap with Skimmer |
| <input checked="" type="checkbox"/> Erosion Control Blankets within 50 ft of Surface Waters | <input checked="" type="checkbox"/> Immediate Stabilization |
| <input type="checkbox"/> Flocculant with PAMs | <input checked="" type="checkbox"/> Vegetative Conveyance |
| <input type="checkbox"/> Riparian Buffer (< 150 ft) | <input type="checkbox"/> Riparian Forest Buffer (< 150 ft) |

not for EV

explain how Q,V WQ managed during construction

Approved Alternative: _____

Explain how the E&S BMP(s) will individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during the earth disturbance activities

Compost filter sock will be placed downhill of the disturbed area. ESC matting will be used on slopes 3:1 and steeper and within 50-feet of surface waters. Inlet protection will be used until upslope drainage areas are stabilized. Bypass swale will be installed as clean water bypass. The existing gravel and cleared areas will be used for access/staging. Sediment traps are proposed to capture sediment prior to discharging offsite.

ANTIDEGRADATION – POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) PLAN

A **Non-Discharge Alternative will be utilized** for the project that either individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

Identify the PCSM BMPs that will be used to achieve the non-discharge alternative:

- | | |
|---|--|
| <input type="checkbox"/> Alternative Siting: Location | <input type="checkbox"/> Low Impact Development |
| <input type="checkbox"/> Alternative Siting: Configuration | <input type="checkbox"/> Riparian Buffer (150-ft. min.) |
| <input type="checkbox"/> Alternative Siting: Location of Discharge | <input type="checkbox"/> Riparian Forest Buffer (150-ft. min.) |
| <input checked="" type="checkbox"/> Infiltration | <input type="checkbox"/> Water Reuse |
| <input checked="" type="checkbox"/> Other: <u>Evapotranspiration with amended soils</u> | |

check

Explain how the PCSM BMP(s) will individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

The infiltration facilities (sub-surface infiltration bed, and surface infiltration basins and dry extended detention basin with amended soils) will manage the net increase in water quality, rate, and volume.

If a **Non-Discharge Alternative will not be utilized**, explain the rationale for non-selection, including why none of the alternatives are considered environmentally sound and cost-effective.

The site is too large to allow non-discharge alternatives.

should be blank-meeting NDA

Antidegradation Best Available Combination of Technologies (ABACT) has been selected for the project that will either individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

Identify the ABACT PSCM BMPs that will be utilized:

- | | |
|---|---|
| <input type="checkbox"/> Rain Garden (with Infiltration) | <input type="checkbox"/> Disconnection of Impervious / Roof Area |
| <input type="checkbox"/> Rain Garden (without Infiltration) | <input type="checkbox"/> Pervious Pavement with Infiltration Bed |
| <input type="checkbox"/> Constructed Filter | <input checked="" type="checkbox"/> Infiltration Basin |
| <input type="checkbox"/> Vegetated Swale | <input checked="" type="checkbox"/> Infiltration Bed |
| <input type="checkbox"/> Vegetated Filter Strip | <input type="checkbox"/> Infiltration Trench |
| <input type="checkbox"/> Constructed Wetland | <input type="checkbox"/> Soil Amendment |
| <input type="checkbox"/> Wet Pond | <input type="checkbox"/> Dry Well / Seepage Pit |
| <input checked="" type="checkbox"/> Dry Extended Detention Basin | <input type="checkbox"/> Infiltration Berm / Retentive Grading |
| <input checked="" type="checkbox"/> Water Quality Device | <input type="checkbox"/> Protect Sensitive / Special Value Features |
| <input type="checkbox"/> Spray / Drip Irrigation | <input checked="" type="checkbox"/> Street Sweeping |
| <input type="checkbox"/> Rain Barrel | <input type="checkbox"/> Green Roof |
| <input checked="" type="checkbox"/> Protect / Utilize Natural Flow Pathways (on-site) | |

Approved Alternative: r

Explain how the PCSM BMP(s) will individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

CERTIFICATION

I certify under penalty of law and subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities) that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Robert Hocke

Applicant Name (type or print legibly)

Manager

Official Title

[Signature]

Applicant Signature

12/9/2024

Date Signed



pennsylvania
DEPARTMENT OF TRANSPORTATION

Date: 04/08/2025
Subject: Highway Occupancy Permit Application No. 329293, Cycle No.5 - Returned For Revisions
To: Tannersville Point LLC
833 Scranton-Carbondale Highway
Dickson City, PA 18508
From: PennDOT Engineering District 5-0
1002 Hamilton Street
Allentown, PA 18101

Dear Applicant,

PennDOT has reviewed your application for completeness, consistency and compliance with applicable Department Regulations. This review has identified issues that must be addressed in order for our review to continue.

The Department's review comments are attached.

Once the comments have been addressed, please resubmit the application and associated material for further review.

Upon resubmission, the applicant's engineer should put together a letter that describes how each comment has been addressed and where each can be found. This will help expedite the review. For guidance on HOP applications refer to 67 PA Code, Chapter 441, Chapter 459 and PennDOT Publication 282, "Highway Occupancy Permit Guidelines". Additional comments may follow upon review of the resubmitted application.

As an alternative to contacting the individual indicated below, the District is offering applicants an opportunity to attend HOP Collaboration Workshop Meetings (held weekly) for clarification on any of the following comments. To sign up, please open the HOP Collaboration Workshop link located in the Links section on the EPS Applications Portal and follow the instructions.

If you have any questions regarding this matter, you may contact Hunter Cero, District Permit Manager, at (610) 871-4439.

Response Comments

Date: 04/08/2025

Application Number: 329293, Cycle No.5

Form Letter Notes

(1) * Upon resubmission, the applicant's engineer should put together a letter that describes how each comment has been addressed and where each can be found in the plan set. A copy of these comments and any previously submitted plans should also be provided.

* Additional comments may follow upon review of the resubmitted application. If you have any questions pertaining to the technical aspects of this review, please contact the Department.

* For guidance on Highway Occupancy Permit applications refer to PA Code Title 67, Chapter 441, Chapter 459 and PennDOT Publication 282. This will help expedite the review."

General

- (1) Provide a complete Land Use Questionnaire (M-950 MPC) with your resubmission.
- (2) You are reminded that, prior to construction, the Department will require the Applicant to provide a Certificate of Insurance and a Letter of Credit (Form M-950L) for the proposed work associated with the HOP. Other forms of security may be acceptable if they meet the requirements of Publication 282, Chapter 2, Section 2.9 "Access Security". These forms can be found in the ePermitting System via the following link:
<https://www.dot14.state.pa.us/EPS/common/COMreferenceMaterialForms.jsp>
The security must be in an amount equal to the estimate construction costs plus a 15% contingency. Note that the construction cost estimate provided appears reasonable.
- (3) Please continue to provide the latest Township review comments and/or approvals with your resubmission.

Application

- (1) You are reminded that the applicant must apply for and obtain an ePermitting Business Partner ID (BP ID) prior to permit issuance. The BP ID is to be used in the establishment of a billing account for the invoicing of inspection costs.
For information on obtaining a BP ID, please visit:
<https://www.epermittingint.pennDOT.gov/EPS/home/manageBPRegistration.jsp>
(Please make sure that you follow the instructions that are in the pink area).

After a BP ID is obtained and activated by your system administrator (This is a 2-step process that must be completed for PennDOT to bill for permit inspection costs at a later date and if not activated, it could delay construction), please provide the following information in the Applicant Contact Info. area within the Applicant Team link of your EPS application.

- 1) BP ID No.
 - 2) Contact information (Name/Title/Phone/E-mail) for a GENERAL contact person (Person that typically deals with the highway occupancy permit application process).
 - 3) Contact information (Name/Title/Phone/E-mail) for a BILLIING contact person (Person that typically deals with the highway occupancy permit invoicing process).
- (2) Include a copy of the completed, signed Applicants Authorization for Agent to Apply for Highway Occupancy Permit form (M-950AA) authorizing a party other than the applicant to submit the application in EPS. Include a copy of the applicants operating agreement showing signatory authority.
- (3) You are reminded that when another application is associated with the proposed development (municipal application for stormwater or sidewalk, application in the name of a utility company, application due to driveway adjustment etc.), select the application in the Link TSP/HOP List section of EPS under Application Setup.

Plan Presentation

- (1) When obtained, add the HOP application number for the proposed waterline on sheet 6 of 15.
- (2) Confirm the dates listed for the RC Standards. Some RC Standards were updated as recently as December 18, 2024.
- (3) Update the SR 4012 traffic data shown on the title sheet to reflect current ADT for 2025 and design ADT and DHV for 2030.

Access Configuration/Profile- Driveways/Local Roads

- (1) You are reminded to confirm the emergency access gate location will allow emergency vehicles to completely clear the eastbound SR 4012 travel lane and shoulder while stopped at the gate.

Sight Distance- Driveways/Local Roads

- (1) The driveway centerlines have been staked in the field, however brush as to be cleared along the sight line for the Department to conduct their sight distance measurements.

Utilities

- (1) You are reminded that a separate highway occupancy permit application must be submitted to the

Department for the installation and/or relocation of any utilities. The applicant is responsible for coordinating with the appropriate utility facility and the Department regarding any utility relocation in accordance with PennDOT Design Manual, Part 5.

March 11, 2025

Krisann MacDougall
Pocono Township
112 Township Drive
Tannersville, PA 18372

Re: Tannersville Point Apartments
Preliminary/Final Land Development Plan & Lot Consolidation

Ms. MacDougall:

The following are our responses to T&M Associates Review No. 2 comment letter of October 22, 2024:

ZONING ORDINANCE COMMENTS:

1. Previous Comment 1 satisfied.
Response: Acknowledged.
2. Previous Comment 2 satisfied.
Response: Acknowledged.
3. In accordance with Section 470-20.C.(2)(c), the rear yard width is required to be a minimum of 25 feet. *The plans do not depict a rear yard and must be revised to show the location in accordance with the ordinance requirements. While the plan has been revised to show a rear yard, it is still missing along some areas of the boundary. It shall be labeled in accordance with the definition of the rear lot line which is "The lot line opposite and most distant from the front lot line."*
Response: The rear yard has been depicted as defined in the ordinance.
4. Previous Comment 4 satisfied.
Response: Acknowledged.
5. Previous Comment 5 satisfied.
Response: Acknowledged.
6. In accordance with Section 470-121, no building, structure, or sign shall be erected, constructed, moved, demolished, added to, or structurally altered, nor shall any use of any land, building structure, or sign be changed or expanded, without a zoning permit therefore

issued by the Zoning Officer. No such permit shall be issued except in conformity with the provisions of this chapter; and:

- a. The applicant supplying satisfactory evidence, where applicable, that the property and the proposed use therefore in compliance of the Sewage Facilities Act of the Commonwealth of Pennsylvania and regulations promulgated pursuant thereto by the Pennsylvania Department of Environmental Protection." *All approvals required by the Pennsylvania Department of Environmental Protection shall be provided to the Township.*
- b. The applicant supplying, where applicable, stormwater management plans approved by the Pocono Township Board of Commissioners in accordance with the applicable Pocono Township stormwater management ordinances, and an erosion and sedimentation control plan approved by the applicable governmental body or agency charged with that responsibility, with respect to any proposed construction, excavation, or other earthmoving activity. *The proposed earth disturbance exceeds one (1) acre, and an NPDES permit is required from the Monroe County Conservation District. All correspondence with, submissions to, and NPDES Permit from the County Conservation District shall be provided to the Township.*

The response letter acknowledges these requirements.

Response: The requested information and correspondence will be provided as needed.

7. All proposed signs shall conform to the requirements of Article VII of the Zoning Ordinance and must receive approval by the Township Zoning Officer prior to erection. *All proposed signage must be submitted to and approved by the Township Zoning Officer. The response letter acknowledges this requirement.*

Response: A location has been shown on the plans for a development sign. A zoning permit for the sign erection is to be submitted separately later.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Waivers in Comments 9, 12, 27, 55, 56, 58, 61, 62, and 96 were requested and recommended for approval by the Township Planning Commission.

8. Previous Comment 8 satisfied.

Response: Acknowledged.

9. Per Section 390-17.B., "An application for final plan approval can be submitted only when the following conditions have been met: (1) The subdivision has previously been granted an unconditional preliminary plan approval in accord with § 390-16 of this chapter or all conditions established by the Township for the preliminary plan approval have been fulfilled by the applicant, excluding any outside agency approval or permits." *The plans have been resubmitted as Preliminary/Final Land Development Plans and a waiver has been requested to permit the combined*

submission. It is noted that the cited SALDO section number is incorrect in the submitted waiver request letter and on the plans and shall be revised accordingly. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.

Response: The cited SALDO section number has been updated on the Cover Sheet of the plans, and in the revised waiver request letter dated March 11, 2025.

10. Previous Comment 9 satisfied.

Response: Acknowledged.

11. In accordance with Sections 390-25.B(3) and 390-29.E.(3), "The survey shall not have an error of closure greater than one in 10,000 feet and shall include a boundary closure report." *Boundary closure reports shall be submitted. The response letter states, "A boundary closure report will be submitted under separate cover." The closure must still be submitted.*

Response: A closure report has been submitted.

12. In accordance with Sections 390-25.B.(4) and 390-29.E.(4), "The sheet size shall be no larger than 24 inches by 36 inches, unless permitted by the Planning Commission." *The submitted plans are 30" x 42" in size. The applicant is requesting a waiver to permit this plan size for legibility. A waiver has been requested to permit the larger plan size due to the size and layout of the project site. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.*

Response: Acknowledged.

13. Previous Comment 12 satisfied.

Response: Acknowledged.

14. In accordance with Sections 390-25.D. and 390-29.G., Existing resources and site analysis, "For all land developments, an existing resources and site analysis shall be prepared to provide the developer and the municipality with a comprehensive analysis of existing conditions, both on the proposed development site and within 500 feet of the site. Conditions beyond the parcel boundaries may be described on the basis of existing published data available from governmental agencies, and from aerial photographs. The Planning Commission shall review the plan to assess its accuracy, conformance with municipal ordinances, and likely impact upon the natural and cultural resources on the property." The information required in Subsections (1) through (12) shall be included. *The Existing Resources and Site Analysis plan shall be prepared and submitted in accordance with the requirements of this Section including, but not limited to, an aerial photograph, identification of slopes between 15% and 25%, and vegetative cover conditions. Additionally, it shall cover the area of the proposed development site and within 500 feet of the site. Topography shall be coordinated with official USGS benchmarks and the location and datum shall be shown on the plan. A separate Existing Resources and Site Analysis plan has now been provided, however; the slope identifications per the legend are not legible on the plan and the location and datum are not shown on the plan.*

Response: The slope hatching has been revised, and the datum has been added to the plan.

15. In accordance with Sections 390-25.E., and 390-29.H., a resource impact and conservation analysis are required. *A Resource Impact and Conservation Analysis shall be provided on the plan and shall include the existing resources in square feet, the proposed disturbance of the existing resources in square feet and percent, and the maximum permitted disturbance. The response letter states, "A Resource Impact and Conservation Analysis has been provided on the plans." We are not able to locate this information. The response shall clarify the exact location of the information.*
Response: A Resource Impact and Conservation Analysis report has been provided with this submission.
16. Previous Comment 15 satisfied.
Response: Acknowledged.
17. Per Sections 390-25.F.(4) and 390-29.I.(4), the improvements plan shall include "Information indicating available and safe sight stopping distances for all driveways, access drives, roads, etc., which must be in compliance with the most current PennDOT specifications." *The required information shall be shown on the plans. The required information is shown on Sheet 4; however, it is not legible on the printed plans. This information shall be provided in a larger text.*
Response: The information indicating available and safe sight stopping distances is shown on Sheet 5, Overall Record Plan, and has been made larger.
18. Per Sections 390-25.F.(9) and 390-29.I.(9), the improvements plan shall include the limit of disturbance line. *While some plan sheets depict a limit of disturbance within their legend, the actual limit of disturbance is not shown on the plan view and must be added. The response letter states, "The limit of disturbance is now shown in plan view." We are not able to locate this information on the plans as there is no line on the plans that matches the LOD line type in the legend. The response shall clarify the exact location of the information.*
Response: The limit of disturbance is now shown on all E&S and PCSM sheets.
19. Previous Comment 18 satisfied.
Response: Acknowledged.
20. Per Sections 390-25.F.(15) and 390-29.I.(15), the improvements plan shall include "A signature block in the lower right hand eighth of the plan immediately above the title block for recommendation by the Planning Commission and for the approval of the Board of Commissioners shall be provided including a space for the date of recommendation/approval." *Pocono Township's specific signature block language will be provided directly to the design engineer for incorporation onto the plans. The response letter states, "Pocono Township's signature block language is now provided."; however, the previously provided language for the Planning Commission and the Board of Commissioners has not been incorporated onto the plan. The plan must still be revised.*
Response: The previously provided language for the Planning Commission and the Board of Commissioners has been added to the title sheet.

21. Per Sections 390-25.F.(16) and 390-29.I.(16), the improvements plan shall include "Signature blocks for the Township Engineer and Monroe County Planning Commission." *Pocono Township's specific signature block language will be provided directly to the design engineer for incorporation onto the plans. The response letter states, "Pocono Township's signature block language is now provided."; however, the previously provided language for the Township Engineer signature has not been incorporated onto the plan. The plan must still be revised.*
Response: The previously provided language for the Township Engineer signature has been added to the title sheet.
22. Per Sections 390-25.F.(20) and 390-29.I.(20), the improvements plan shall include the "Name and address of the owner of record (if a corporation, give name of each officer) and current deed book and page where the deed of record is recorded." *The required information shall be provided on the plan. The response letter states, "The name and address of the owner of record and current deed book and page are now provided."; however, we are unable to locate the information. The response shall clarify the exact location of the information.*
Response: The requested information can be found on Sheet 3 and Sheets 8-11.
23. Per Sections 390-25.F.(29) and 390-29.I.(29), the improvements plan shall include a "Certificate of ownership and acknowledgement of the plan, in the form provided by the Township, which shall be accurately completed, signed by the owner of the property, dated and notarized." *The certificate on the plan must be corrected to reflect Pocono Township. Sample certificate language will be provided directly to the design engineer for incorporation onto the plans. The response letter states, "The certificate on the plan has been corrected."; however, the previously provided language has not been incorporated onto the plan. Additionally, the new owner's certification on the plan references "Borough of Lehighton, Carbon County". The plan must still be revised.*
Response: The certificate of ownership has been revised to state, 'Pocono Township' and 'Monroe County' on the cover sheet.
24. Previous Comment 23 satisfied.
Response: Acknowledged.
25. Per Sections 390-25.F.(32)(n) and 390-29.I.(32)(m), the improvements plan shall include "A listing of any subdivision/land development waivers or modifications, zoning variances, special exceptions and/or conditional uses that have been granted, including the date of the order of the Pocono Township Zoning Hearing Board or Board of Commissioners granting the same." *The referenced information shall be listed on the plans, as applicable. While the requested waivers have been added to the cover sheet, a location for the date of the granting by the BOC must still be provided.*
Response: A location for the date of the granting by the BOC has been provided above the list of requested waivers on the cover sheet.
26. Per Sections 390-25.F.(33) and 390-29.J.(20), the supporting documents shall include "Design plans and calculations, signed and sealed by a professional engineer, for any retaining walls over four feet in height." *Since this information will be required as part of the project building code*

permitting, a note may be added to the plans identifying this requirement. A retaining wall note was added to Sheet 2; however, it must be further stated that the information is required for a permit. It is not supplemental to the land development plan as currently noted.

Response: The retaining wall note on sheet 2 has been revised to state that the design plans and calculations are required for a permit.

27. Per Sections 390-25.G.(1)(c), 390-25.G.(19), and 390-29.J.(1)(c), the plans shall include "truck turning movement diagrams for at least a WB-50 truck." *A turning movement diagram for a WB-50 truck shall be provided. A waiver has been requested to not require a WB-50 truck turning movement. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.*

Response: Acknowledged.

28. Per Sections 390-25.G.(2), 390-25.G.(20), and 390-29.J.(2), "Exterior elevations (including at least front and side elevations) of any proposed buildings if the property is to be developed for a use other than single-family detached dwellings." *Architectural renderings of the front and side elevations of the proposed buildings shall be submitted. The response letter states, "Architectural renderings are now provided as an example." The provided elevations are for a building in New Jersey. It must be clarified if the developer is proposing to use the same building type for this project. If not the same, then any appearance differences must be identified.*

Response: Updated architectural renderings have been provided. These are the same building type that the developer plans to use for this project.

29. In accordance with Sections 390-25.G.(4) and 390-29.J.(4), submittals shall include "All proposed offers of dedication and/or reservation of rights-of-way and land areas with conditions attached." *It is our understanding that the pump station is proposed to be dedicated to the Township. This shall be addressed through an offer of dedication and the plans shall reflect any subdivision of the property. The response letter states, "An offer of dedication has been provided." The offer was not included in the resubmission and shall be provided.*

Response: The land around the sanitary sewer pump station is now delineated as an easement area dedicated for the benefit of Pocono Township. A legal description of the easement area has also been provided with this submission.

30. In accordance with Sections 390-25.G.(6) and 390-29.J.(6), the plan submission shall include "Proof of legal interest in the property, a copy of the latest deed of record and current title search report." *The Applicant shall provide the latest deed of record and current title search report. The response letter states, "The latest property deed has been submitted. A title search report will be submitted under separate cover." The title search must still be provided.*

Response: The title search is to be provided under separate cover from the project attorney's office.

31. In accordance with Sections 390-25.G.(7)(c) and 390-29.J.(7)(c), Water supply information. Publicly owned central system. "A letter from the water company or authority stating that said company or authority will supply the development including a verification of the adequacy of service." A

letter from BCRA shall be provided verifying adequate service of the proposed development. The response letter acknowledges this requirement.

Response: Acknowledged.

32. In accordance with Sections 390-25.G.(8)(a) and 390-29.J.(8)(a), "Completed sewage facilities planning module(s) for land development and other required sewage planning documents as required by the Pennsylvania Sewage Facilities Act and PADEP." *The Applicant shall provide a copy of the Planning modules and PADEP Act 537 Approval to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged.

33. In accordance with Sections 390-25.G.(8)(c) and 390-29.J.(8)(c), "If service by the Township, a sewer authority or a public utility is proposed, a letter or other written certification from the Township, the authority or the public utility stating that it will provide the necessary sewer service and verifying that its system has adequate capacity to do so." *The Applicant shall obtain and provide the required written certification to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged.

34. In accordance with Sections 390-25.G.(9) and 390-29.J.(9), supporting documents to be submitted include "A list of any public utility, environmental or other permits required and if none are required, a statement to that effect. The Township may require a professional engineer's certification of such list." In addition, and in accordance with Section 390-29.J.(19), "All required state or federal environmental and other permits." *The Design Engineer shall submit the required list of required permits/approvals to the Township. The following outside agency approvals are required:*

- a. *Monroe County Planning Commission*
- b. *Monroe County Conservation District/Pennsylvania Department of Environmental Protection – NPDES Permit*
- c. *Pennsylvania Department of Environmental Protection – Sewage Facilities Planning Module*
- d. *Pocono Township – Sanitary Sewer Review and Service, all comments received by the Township Sewer Engineer shall be addressed*
- e. *Brodhead Creek Regional Authority – Water Service Will-Serve, Treatment Plan capacity*
- f. *Pennsylvania Department of Transportation – Highway Occupancy Permit*
- g. *Pocono Township Fire Department*

The response letter acknowledges these requirements and an approvals table has been added to the cover sheet.

Response: The approvals table is shown on the cover sheet of the plans and will be updated accordingly when they are received.

35. In accordance with Sections 390-25.G.(10) and 390-29.J.(10), the Applicant shall provide "Confirmation that the soil erosion and sedimentation control plan has been accepted for review by the Monroe County Conservation District (See also §390-51.)" *Submissions to, correspondence with, and permit from the Monroe County Conservation District shall be provided. The response letter acknowledges this requirement.*
Response: As correspondence occurs with the Monroe County Conservation District it will be shared with the Township. Permits will be provided when available.
36. In accordance with Sections 390-25.G.(14) and 390-29.J.(14), "Where the land included in the subject application has an electric transmission line, a gas pipeline, or a petroleum or petroleum products transmission line located within the tract, the preliminary plan shall be accompanied by a letter from the owner or lessee of such line stating any conditions on the use of the land and the minimum building setback and/or right-of-way-lines. This requirement may also be satisfied by submitting a copy of the recorded agreement." *The required information with respect to the PPL easement at the rear of the property and any conditions associated with the existing easement shall be provided to the Township. The plan currently reflects proposed grading within the easement and elimination of the existing access to the easement. Approvals for this work may be required from PPL. The response letter acknowledges this requirement.*
Response: An encroachment exhibit was submitted to PPL as part of this submission. No structures are proposed within the PPL easement. Furthermore, the access from the stone/dirt pathway across the property will be enhanced with driveways internal to the property to provide a new upgraded access for PPL.
37. In accordance with Sections 390-25.G.(15) and 390-29.J.(15), the Applicant shall provide "Confirmation that the highway occupancy permit application has been accepted for review by the Township or PennDOT as applicable." *Submissions to, correspondence with, and permit from the Pennsylvania Department of Transportation shall be provided. The response letter acknowledges this requirement.*
Response: All correspondence with PennDOT will be provided to the Township. The latest review letter from PennDOT, dated October 17, 2024 has been provided with this submission.
38. In accordance with Sections 390-25.G.(16) and 390-29.J.(16), the Applicant shall provide "A written plan for the ownership of and maintenance of all improvements, common areas and open space as required by §390-38 and 390-39 of this chapter." *A written plan shall be provided within the plan set. A list of Ownership and Maintenance Responsibilities has been added to Sheet 4. Several items, including, but not limited to, the sanitary sewer to the pump station and the site infrastructure (driveways, parking areas, retaining walls, and signage) are missing and the list shall be updated accordingly.*
Response: All improvements requested have been added to the Ownership and Maintenance Responsibilities on Sheet 5.
39. In accordance with Sections 390-25.H. and 390-29.K., the Applicant shall provide a "Community/financial impact analysis. A community impact analysis including the following

information shall be required for residential subdivisions or land developments containing 15 or more dwelling units." *The required community/financial impact analysis shall be provided. The response letter states, "A community impact analysis has been provided with this submission."; however, it was not provided either in the print or electronic submission.*

Response: A community/financial impact analysis has been provided with this submission.

40. In accordance with Sections 390-25.K. and 390-29.N., "Prior to approval of the preliminary/land development plan, the applicant shall submit to the Township a preliminary/land development plan engineering certification stating that the proposed layout of proposed roads, lots, and open lands complies with the Township's ordinances, particularly those sections governing the design of subdivision roads and stormwater management facilities, and that all improvements will be installed in accord with the specific requirements of this chapter or any waivers or modifications granted by the Township." *The required certification shall be provided. The response letter states, "Acknowledged." The certification is still required. It may be placed on plan that will be recorded.*

Response: There is both a Certificate of Accuracy and Compliance and a Professional Engineer's Stormwater Certification on the cover sheet.

41. Previous Comment 40 satisfied.

Response: Acknowledged.

42. In accordance with Section 390-32.B. and Section 390-41., no final plan shall be signed by the Board of Commissioners for recording in the office of the Monroe County Records of Deeds until:

All improvements required by this chapter are installed to the specifications contained in Article VI of this chapter and other Township requirements and such improvements are certified by the applicant's engineer; or

Proposed developer's agreements and performance guarantee in accord with §390-35 and the Pennsylvania Municipalities Planning Code, Act 247 of 1968 as amended, have been accepted by the Board of Commissioners.

The Applicant shall submit, with the final plan, a construction cost estimate for the proposed site improvements in order to determine the required escrow amount for the developer's agreement. A developer's agreement and performance guarantee will be required prior to plan recordation. A construction cost estimate has been provided. It will be reviewed under separate cover when the plan revisions are nearing completion.

Response: Acknowledged.

43. In accordance with Section 390-38.A. and Section 390-38.B., the developer shall provide to the satisfaction of the Board of Commissioners, and prior to final plan approval, evidence of the provision, including a plan, for the succession of ownership and responsibility for the operation and maintenance of development improvements." *The required documentation and agreement(s)*

shall be provided to the Township prior to final plan approval. The response letter acknowledges this requirement.

Response: Acknowledged.

44. In accordance with Section 390-38.C.(3), "Any improvements which will remain private. In the case where roads, drainage facilities, a central sewage treatment system or central water supply, or any other improvements are to remain private, the developer shall provide for the establishment of an escrow fund in accord with §390-35A to guarantee the operation and maintenance of the improvements. Said fund shall be established on a permanent basis with administrative provisions approved by the Board of Commissioners. The amount of said fund shall be 15% of the construction cost of the system as verified by the Township Engineer. The maintenance and operation of the improvements and the administration of any required maintenance fund account shall be clearly established as the joint responsibility of the owner(s) of each structure or dwelling unit served by such system. Such responsibility and the mechanism to accomplish same shall be established by deed covenants and restrictions which shall be subject to the approval of the Board of Commissioners." *An operation and maintenance agreement and guarantee shall be required for the stormwater management facilities. The response letter acknowledges this requirement.*

Response: We anticipate that the Township solicitor will provide the standard form for the developer's attorney to review and revise as needed for this project.

45. In accordance with Section 390-43.A.(6)(e), "Steep slopes. The purpose of steep slope regulations is to conserve and protect those areas having steep slopes from inappropriate development and excessive grading; to prevent potential dangers caused by erosion, stream siltation, and soil failure; and to promote uses in steep slope areas that are compatible with the preservation of existing natural features, including vegetative cover by restricting grading of steep slope areas." *Steep slopes are defined as being 20% or greater and shall be identified on the plan accordingly. Additionally, the restrictions and requirements of this section shall be addressed. The response letter states, "The steep slopes have now been identified as 20% or greater." We are unable to find this required identification within the submitted information; the plans show slopes of 15%-25% and 25% and greater. Additionally, the restrictions and requirements of the cited ordinance section must be addressed.*

Response: The hatching of the steep slopes has been revised. The slope zone legend has been revised to only show 20% or greater. A steep slope note has been added on Sheet 8 to address the contents of the referenced section.

46. In accordance with Section 390-46.A., "Protection of vegetation from mechanical injury. Where earthwork, grading, or construction activities will take place in or adjacent to woodlands, old fields or other significant vegetation or site features, the Township may require that the limit of disturbance be delineated, and vegetation protected through installation of temporary fencing or other approved measures. Such fencing shall be installed prior to commencing of, and shall be maintained throughout, the period of construction activity." *The Erosion & Sedimentation Control Plan shall be revised to show tree protection fence along the limits of disturbance lines and/or along the dripline of the trees to be preserved. The response letter states, "Tree protection fence is now shown on the E&S plans." The plans show only a few small sections of fence and is very difficult to*

discern on the plans due to the light line type. The tree protection fence shall be shown along all limit of disturbance lines (where there is no tree line) and/or along the dripline of the trees to be preserved, whichever is applicable. Additionally, the fence shall be depicted in the legend on the plan sheets.

Response: Tree protection fence has been shown along the dripline of the trees to be preserved on all E&S plan sheets.

47. In accordance with Section 390-46.C., "Protection of vegetation from excavations. When digging trenches for utility lines or similar uses, disturbances to the root zones of all woody vegetation shall be minimized. If trenches must be excavated in the root zone, all disturbed roots shall be cut as cleanly as possible. The trench shall be backfilled as quickly as possible." *This shall be noted on the Erosion & Sedimentation Control Plans. The response letter states, "A note has been added to the plans." We are not able to locate this note in the plan set. The response shall clarify the exact location of the information.*

Response: The note appears on Sheets 41, 45, 49.

48. Previous Comment 47 satisfied.

Response: Acknowledged.

49. Per Section 390-48.C., "Roads shall be graded, improved and surfaced to the grades and specifications shown on the plans, profiles, and cross sections as required by this chapter." The Cartway width of a Connector Road shall be 44 feet with shoulders or with curbs – no parking. *The plans propose an 18-foot half-width cartway for Warner Road at and east of the proposed driveway. Warner Road west of the proposed driveway reflects no proposed widening and has an approximately 11.4-foot existing half-width. Since Warner Road is a PennDOT road, we recommend deferring the improvement requirements to PennDOT. The response letter acknowledges these requirements.*

Response: The latest PennDOT review comments have been included in this submission. Additionally, the revised plans being resubmitted to PennDOT to address their comments is also included in this submission to the Township.

50. Per Section 390-48.O.2.(a), "Utility easements shall be a minimum of 10 feet in width and shall be provided along all road rights-of-way in addition to the required road width." *The required utility easement shall be shown along Warner Road. The plans have been revised to show the utility easement on the Utility Plans. The easement must also be clearly depicted on both the Record Plans and the Landscape Plans.*

Response: The easement is now shown on the Record Plans and the Landscape Plans.

51. Per Section 390-48.S. Clear sight triangles. "At all road intersections and all land development driveways/accesses, a triangular area shall be graded and/or other sight obstructions removed in such a manner as not to obscure vision between a height of two to 10 feet above the center-line grades of the intersecting roads." *Clear sight triangles shall be shown on the plan and restrictions noted. The response letter states, "Clear sight triangles are now shown on the plan and the restrictions have been noted." The landscape plans show a shaded area along what appears to be*

the "available sight distance"; however, it is neither labeled nor shown in the legend and there are numerous proposed landscape plantings within it. The clear sight triangle should be a minimum of 75 feet along each road/driveway leg with no obstructions. Additionally, the requirements of this section must be added to the Landscape Notes on Sheet 2.

Response: The requirements of Section 390-48.S. have been added to the Landscape Notes on Sheet 2 as note 10. The clear sight triangles are now labeled. The plantings have been relocated out of the sight triangle.

52. In accordance with Section 390-48.T.(2), "Sight distance requirements for all driveways and access drives intersecting a state, Township or private road shall be in accordance with the Pennsylvania Code, Title 57, Transportation, Chapter 441 "Access to and Occupancy of Highway by Driveways and Local Roads," last edition. All sight distance obstructions, including, but not limited to, embankments and vegetation, shall be removed by the applicant to provide the required sight distance." *The required and provided sight distances shall be added to the plans. The sight distance information has been added to Sheet 4, but is too small to read on the printed plan. The size of the font shall be increased for legibility.*

Response: The size of the font has been increased for legibility.

53. Per Section 390-48.T.(10), "Where access is to a state road, a valid state highway occupancy permit shall be obtained prior to plan recording. Where PennDOT standards differ from those of the Township, the more restrictive regulations shall apply. *A PennDOT HOP is required for access to Warner Road. Submissions to, correspondence with, and permit from the Pennsylvania Department of Transportation shall be provided. The response letter acknowledges this requirement.*

Response: Acknowledged. Please reference the latest review letter from PennDOT dated October 17, 2024 and included in this submission to the Township.

54. In accordance with Section 390-48.T.(13)(a), "The access drive within the legal right-of-way of the public road, or for a distance of at least 20 feet from the edge of the cartway, whichever is greater, shall not have a grade in excess of 4%. The grade of any access drive shall not exceed 10%." *The plans must demonstrate compliance with this requirement. The plans must still address the compliance of the new pump station access drive/emergency access to Warner Road.*

Response: The emergency access profile has been revised to match the PennDOT HOP plans. The grade of the shoulder on Warner Road at the entrance of the emergency access is shown at 5.94%. This slope was required by PennDOT, therefore the access drive will have a grade greater than 4%. Please reference the PennDOT plans and PennDOT's latest review letter.

55. Per Section 390-48.T.(13)(b), "Access drive entrances into all nonresidential and nonagricultural use properties shall be no less than 24 feet in width, shall not exceed 36 feet in width at the road line, unless provided with a median divider, and shall be clearly defined by curbing. The curbs of these driveway entrances shall be rounded with a minimum radius of 20 feet from where they intersect a road." *Radii dimensions must be added to the driveway entrance at Warner Road as required by the ordinance. Additionally, the "road line" is defined as being at the right-of-way line; therefore, the proposed driveway is 40 feet wide at that point and does not meet the ordinance requirement. A waiver has been requested to permit the driveway to have a width of 40.25 feet at*

the road line. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.

Response: Acknowledged.

56. Per Section 390-48.T.(14), "Concrete aprons shall be provided for all access drives with concrete sidewalks." *Concrete aprons must be provided for the driveway. Since Warner Road is a PennDOT road, if they do not permit the apron, a waiver will be required. A waiver has been requested to permit this use of asphalt in lieu of the required concrete apron. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.*

Response: Acknowledged.

57. Previous Comment 57 satisfied.

Response: Acknowledged.

58. In accordance with Section 390-48.AA., "sidewalks and road crosswalks may be required where necessary to provide proper pedestrian circulation or to provide access to community facilities and common areas. Sidewalks, where required or provided, shall be located within the road right-of-way immediately adjacent to the curbs, except as may be approved by the Township to accommodate road trees or other landscaping. Sidewalks and road crosswalks shall be constructed in accord with the most current PennDOT RC67M standard and Americans with Disabilities Act standards." *It is noted that the plan proposes sidewalk along Warner Road east of the proposed driveway and a small area to the west. Sidewalk shall be provided along the entire frontage unless a waiver/deferral is obtained by the Board of Commissioners. A waiver has been requested to not provide sidewalk west of the site entrance due to the configuration of the I-80 bridge in that area. The Township Planning Commission recommended a deferral of the requirement to extend sidewalk from the entrance drive to I-80 at its meeting held on October 15, 2024. Additionally, the applicant agreed to extend the sidewalk extended from the pump station driveway to the property line to the east.*

Sheet 34 of the revised plans now contains a "sidewalk detail with curb" that shows a sidewalk width of 4.33 feet. In accordance with Chapter 3, R302 of the U.S. Access Board Public Right-of-Way Accessibility Guidelines, "Except as provided in R302.2.1 and R302.2.2, the continuous clear width of pedestrian access routes shall be 48 inches (1220 mm) minimum, exclusive of the width of any curb." and "Where the clear width of pedestrian access routes is less than 60 inches (1525 mm), passing spaces shall be provided at intervals of 200 feet (61m) maximum. Passing spaces shall be 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum. Passing spaces and pedestrian access routes are permitted to overlap." With the longitudinal joint being parallel to the travel path, the surface area of the curb cannot be counted towards the clear width. The sidewalks shall either be revised to be 5 feet (60 inches) wide or the required passing spaces provided.

Response: All sidewalks have been revised to be 5 feet and the detail has been updated accordingly.

59. In accordance with Section 390-48.BB., "Parking on roads. Off-road parking for all uses shall be provided in accord with this chapter; and roads shall not be designed to accommodate on-road

parking except in accord with §390-48.X.(6)." *The applicant represented at their Planning Commission presentation that the interior roadway was designed to accommodate on-street overflow parking and it is noted that a portion of the cartway is shown to be wider. The on-street parking shall be clarified on the plans. The response letter states, "No on-street parking will be provided. No parking signs have been added to the shoulder of the proposed driveway." It is still unclear as to why the driveway is proposed to be 32 feet within Phase 2. This must be clarified. Also, no parking signs must be provided on both sides of the driveway for its entire length.*

Response: The driveway is proposed to be 32 feet in this area to allow for traffic to continue to flow in the event of an accident. If the Township does not see the need for this, then the width will be reduced to 24 feet and the shoulder will be removed. No parking signs have been added to both sides of the driveway for its entire length. Or, in the alternative, this area could be used for overflow parking in excess of the Township requirements.

60. In accordance with Section 390-49.A.(4), "Monuments shall be set at all outbound locations where permanent monuments did not exist at the time of the perimeter survey unless site conditions preclude the installation, and the missing monument shall be noted on the final plan. Existing monuments shall not be removed." *The Lot Line Adjustment Plan (Sheet 3) shall be revised to provide the required monuments at each change of direction along the outbound of the property. Eight (8) additional concrete monuments are required to be placed along the property line at I-80. These are incorrectly shown as iron pins.*

Response: The iron pins have been updated to be shown as concrete monuments.

61. Per Section 390-50.D.(3), "Side slopes. Whenever possible, the side slopes and basin shape shall conform to the natural topography. When such design impracticable, the construction of the basin shall utilize slopes as flat as possible to blend the structure into the terrain." *A waiver has been requested to this requirement due to the basin being an underground modular concrete structure which is completely out of sight. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.*

Response: Acknowledged.

62. Per Section 390-50.D.(4), "Water depth. The maximum water depth, measured from the invert of the lowest outlet orifice to the peak one-hundred-year water surface elevation, shall not exceed five feet." *The proposed underground basin depth exceeds the ordinance limitations. The design shall be revised or a waiver requested. A waiver has been requested to permit the underground concrete vault system/basin to have a depth of 9.32 feet. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024.*

Response: Acknowledged.

63. In accordance with Section 390-50.D.(11)(a) "Emergency overflow facilities shall be provided for detention facilities to handle runoff in excess of design flows." *It is unclear as to where the emergency overflow for the detention basin is located. This must be clarified. The response letter states, "The emergency overflow has been denoted as OCS-1 on the plans. Additionally, a detail has been provided." We are unable to locate the referenced detail. The response shall clarify the exact*

location of the information. Additionally, the OCS-1 label on Sheets 50 and 51 is obscured and it is missing from Sheets 52 and 53.

Response: The Outlet Control Structure Detail is on the bottom left side of Sheet 63. The OCS-1 label has been added on Sheets 58 and 59.

64. In accordance with Sections 390-51.A. and B., "All soil erosion and sedimentation control plans shall meet the specifications of the Monroe County Conservation District and PA DEP, and shall comply with Commonwealth of Pennsylvania, Title 25, Chapter 102, Department of Environmental Protection regulations for soil erosion and sedimentation control", and, "Preliminary plan approval shall be conditioned on all required approvals and permits from the Monroe County Conservation District and/or PA DEP." *The proposed site disturbance is greater than one (1) acre, therefore an NPDES Permit is required. A copy of the NPDES Permit and letter of determination of erosion and sediment control adequacy shall be provided to the Township, as well as any correspondence between the Applicant and Monroe County Conservation District and PADEP. The response letter acknowledges this requirement.*

Response: A copy of the NPDES Permit and letter of determination of erosion and sediment control adequacy will be provided when available and all correspondence with the Monroe County Conservation District will be provided to the Township.

65. In accordance with Section 390-52, "All subdivisions and land developments shall be served by an adequate water supply and sewage disposal system; and the developer shall provide evidence documenting said adequacy." *The Applicant shall provide confirmation of adequacy from the Township and BCRA. The response letter acknowledges this requirement.*

Response: The confirmation of adequacy will be provided when available.

66. In accordance with Section 390-52.A.(4), "In the case of utilization of a publicly owned or other existing centralized water supply and/or sewage disposal system the developer shall submit at the preliminary stage a letter from the operator of such utility indicating the utility owner's willingness to supply service to the development and including a verification of the adequacy of the utility system to serve the proposed development. At the final approval stage an executed agreement with the service supplier shall be submitted." *A copy of the will serve letter for public sanitary sewer service and public water service shall be obtained. The response letter acknowledges this requirement.*

Response: A copy of the will-serve letter will be provided when available.

67. In accordance with Section 390-52.A.(5), "All required certificates of convenience, approvals and permits shall be obtained by the developer and/or the utility owner as a condition of preliminary approval and shall be submitted with the final plan application." *PADEP Act 537 Approval shall be obtained and a copy of the approval letter from PADEP shall be provided to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged.

68. In accordance with Section 390-52.E.(4)(c), "Where water is to be provided by means other than by private wells owned and maintained by the individual owners of lots within the subdivision or

land development, the applicant shall present evidence to the Township that the subdivision or land development is to be supplied by a certificated public utility, a bona fide cooperative association of lot owners, or by a municipal corporation, authority or utility. A copy of a certificate of public convenience from the Pennsylvania Public Utility Commission or an application for such certificate, a cooperative agreement or a commitment or agreement to serve the area in question, whichever is appropriate, shall be acceptable evidence. Such evidence shall be provided prior to recording of the final plan." *The required documentation confirming public water service shall be provided to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged.

69. Per Section 390-52.E.(4)(f), fire protection standards shall apply to the design and construction of the water system. *Confirmation of compliance with these requirements shall be provided to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged. The fire hydrants have been placed according to the requirements for proximity to the proposed buildings. Additionally, the apartment buildings will include sprinkler systems.

70. In accordance with Section 390-52.E.(4)(j), "Approvals/reviews. No construction of any water distribution system shall commence prior to written approvals and/or comments from the Department of Environmental Protection, the Fire Department, and the Township." *Copies of all required permits and approvals shall be submitted to the Township. The response letter acknowledges this requirement.*

Response: Acknowledged.

71. In accordance with Section 390-53, "All utility lines required to service the subdivision shall be planned in cooperation with the respective utility companies. A letter shall accompany the subdivision or land development plan stating that the utility plan has been reviewed by the applicable utility company, such plan is approved, and service will be available. All cables, wires, conduits, pipes, and lines servicing the development shall be subject to the requirements set forth in this chapter." *Documentation shall be submitted to the Township as required. The response letter acknowledges this requirement.*

Response: Acknowledged.

72. In accordance with Section 390-55.B.(1), "Preservation of existing vegetation. Each mature tree, tree mass, or woodland on the site shall be designated "TO REMAIN" or "TO BE REMOVED" and shall be shown on the plan" in accordance with the criteria in this section. *The plan shall be revised to show the disposition of existing vegetation on the site. This information should be provided on a demolition plan. The response letter states, "The plan has been revised accordingly." We are unable to locate the required preservation information. The response shall clearly indicate how the comment has been addressed.*

Response: The existing tree lines on the property have been labeled as TBR or To Remain on the Existing Features and Demolition plan. The proposed tree lines are labeled on the Grading and Drainage plans and the Landscape plans.

73. Pursuant to Section 390-55.B.(2), "Protection of existing vegetation. Existing vegetation designated "TO REMAIN" in accord with Subsection B(1)(c), above, shall be identified in the field prior to any clearing and shall be physically protected throughout the construction process. A temporary physical barrier, such as a snow fence, shall be erected a minimum of one foot outside the dripline on all sides of individual trees, tree masses, or woodlands prior to major clearing or construction. The barrier shall be placed to prevent disturbance to, or compaction of, soil inside the barrier and shall remain until construction is complete. The barrier shall be shown on the landscape plan." *Tree protection fencing shall be shown along the "proposed" treeline. A detail of the fencing shall also be added to the plans. The response letter states, "Tree protection fencing is now provided and a detail has been added." The plans show only a few small sections of fence and is very difficult to discern on the plans due to the lightness of the line type. The tree protection fence shall be shown along all limit of disturbance lines (where there is no tree line) and/or along the dripline of the trees to be preserved, whichever is applicable. Additionally, the fence shall be depicted in the legend on the plan sheets.*

Response: Tree protection fence has been shown along the dripline of the trees to be preserved on all E&S plan sheets.

74. Per Section 390-55.B.(6), "Clear sight triangles. All landscaping shall comply with the sight distance requirements of this chapter, including intersections of public streets and access drives of commercial, industrial, and multifamily developments." *The clear sight triangles shall be shown on the landscaping plan. The response letter states, "The clear sight triangles are now shown on the landscaping plan." The landscape plans show a shaded area along what appears to be the "available sight distance"; however, it is neither labeled nor shown in the legend and there are numerous proposed landscape plantings within it. The clear sight triangle should be a minimum of 75 feet along each road/driveway leg with no obstructions.*

Response: The clear sight triangles have been labeled. The proposed landscape plantings have been removed from the clear sight triangles.

75. Per Section 390-55.C.(2)(a), "One planting island shall be provided for every 10 parking stalls." *It appears that 50 islands have been provided; however, 64 are required based on the number of parking spaces. The plan shall include a tabulation demonstrating that this requirement has been met.*

Response: A tabulation has been added to Sheet 5, and 66 planting islands are now shown.

76. Per Section 390-55.C.(2)(g), "The placement of light standards shall be coordinated with the landscape plan to avoid a conflict with the effectiveness of light fixtures." *The proposed light standards must be shown on the Lighting and Landscape Plans. The response letter states, "The plan has been revised accordingly."; however, no light standards have been shown on the Lighting and Landscape Plans. The required information must still be added to the plans.*

Response: The lighting will be revised and submitted under separate cover.

77. Previous Comment 74 satisfied.

Response: Acknowledged.

78. Previous Comment 75 satisfied.
Response: Acknowledged.
79. Per Section 390-55.D.(3)(c), "Trees shall be located so as not to interfere with the installation and maintenance of sidewalks and utilities. Trees shall be planted a minimum distance of three feet from curbs and sidewalks, 15 feet from overhead utility poles with appropriate species selection for trees under utility wires, and six feet from underground utilities." *The plans must clarify the location of the new utility poles along Warner Road to verify that the proposed street trees are not located within 15 feet of overhead utilities. The response letter states, "The plan has been revised accordingly."; however, the utility pole relocations have not been shown. Additionally, there are numerous locations where the proposed trees are shown to be located less than 6 feet from underground utilities and must be relocated.*
Response: No utility poles are proposed to be relocated along Warner Road. The proposed trees have been relocated to satisfy a six-foot minimum separation from underground utilities.
80. Previous Comment 77 satisfied.
Response: Acknowledged.
81. Previous Comment 78 satisfied.
Response: Acknowledged.
82. In accordance with Section 390-55.F.(3)(c) and Table 390-55-1, "The width and quantity and type of plants required shall be determined by the intensity of the proposed land use and the adjacent land use, vacant land, or zoning district, according to Table 390-55-1." *Buffer calculations must be provided on the Landscaping Plan. The calculations/tabulation shall include the property line lengths, the intensity of the buffer, and the required and provided number of plants for each. The response letter states, "The buffer calculations are now provided on the landscape plans." We are unable to verify how the lengths in each buffer calculation were determined as they do not appear to match property line lengths. The landscape architect shall provide a plan identifying the location of each buffer type and/or clearly identify each property line length included within each calculation.*
Response: The buffer lengths were calculated using the property line lengths. The buffer calculations have been revised accordingly.
83. Previous Comment 81 satisfied.
Response: Acknowledged.
84. In accordance with Section 390-55.F.(3)(f)[4], "A variety of tree species is required". *The plan shall demonstrate compliance with the required maximum percentage of any one species. The response letter states, "The plan now demonstrates compliance with the maximum percentage of any one species." The plans do not meet the variety requirements. The variety shall be determined by material type, e.g., shade trees, evergreen trees, ornamental/flowering trees, deciduous shrubs, and evergreen shrubs. For example, the plan currently proposed 215 shade trees, with 5 species, of which Acer*

Saccharum comprises 48.8%. A minimum of 6 species are required and a maximum of 20% of any one species provided. The plans shall be revised accordingly for each material type.

Response: The species have been revised accordingly.

85. In accordance with Section 390-55.F.(4)(c), "The type of site element screen required shall be determined by the site element and the adjacent existing land use or zoned use in the case of vacant land, according to Table 390-55-2." *Site element screens and calculations must be provided on the Landscaping Plan for the dumpster areas and the sewer pump station. The response letter states, "The plans have been revised accordingly.", but no calculations have been provided for the dumpster areas or the pump station. Calculations and additional screening must be provided for the dumpsters and pump station.*

Response: A calculation for the pump station buffer has been provided and it has been labeled. The dumpsters are being screened using Screen Type No. 9 Low Wall. A detail has been provided on Sheet 36.

86. Previous Comment 83 satisfied.

Response: Acknowledged.

87. Previous Comment 84 satisfied.

Response: Acknowledged.

88. In accordance with Section 390-55.I., "Landscape plans shall be prepared by a landscape architect licensed and registered to practice by the Commonwealth of Pennsylvania or other person deemed qualified by the Township." *The landscape plans shall be signed and sealed by the landscape architect who prepared them.*

Response: The landscape plans have been signed and sealed by the landscape architect who prepared them.

89. In accordance with Section 390-55.I.(2)(k), "A detailed cost estimate shall be submitted, showing the value of all proposed landscaping, including all labor and materials." *The required cost estimate for the project shall include the proposed landscaping. This will be required for the final plan. A construction cost estimate has been provided. It will be reviewed under separate cover when the plan revisions are nearing completion.*

Response: Acknowledged.

90. In accordance with Section 390-56.A.(4)(a), "Lighting plans shall be submitted for reviews and approval of any installation of lighting in connection with a land development application for any use identified in Subsection A(2) of this section. Lighting plans shall include the following:

- [1] A site plan complete with all structures, parking spaces, building entrances, traffic areas (both vehicular and pedestrian), vegetation that might interfere with lighting, and adjacent uses that might be adversely impacted by the lighting, containing a layout of all propose fixtures by location and type.

[2] Description of the proposed equipment shall be included, including fixture catalog cuts, photometrics, glare-reduction devices, lamps and mounting heights."

The submitted "Lighting and Landscape" Plans do not contain any information on the proposed lighting. Lighting plans conforming to the ordinance requirements shall be submitted. The response letter states, "Lighting has been added to the Lighting and Landscape plans." The only lighting shown on the plans are wall-mounted lights on the buildings. The required information shall be provided for the site lighting as well.

Response: The lighting will be revised and submitted under separate cover.

91. Previous Comment 88 satisfied.

Response: Acknowledged.

92. Per Section 390-56.A.(6), lighting shall meet the specified performance standards. *Lighting plans conforming to the ordinance performance standards shall be submitted. The only proposed lighting shown on the plans are wall-mounted lights on the buildings. Per Section 390-56.A.(6)(c), "the use of floodlights and wall-mounted luminaires shall not be permitted to illuminate parking areas unless it can be proven to the satisfaction of the Township that the employment of no other means is possible." The plans shall be revised accordingly.*

Response: The lighting will be revised and submitted under separate cover.

93. Per Section 390-56.B., "Road, parking area and building lighting. Road lights may be required when considered necessary by the Board of Commissioners and shall be of such design and spacing as required by the Board of Commissioners. A lighting plan shall be provided by the developer when required and shall include details for lighting of roads, parking areas and buildings. Road lights shall be required for all major subdivisions unless the developer documents that such lighting is not necessary and a modification is granted by the Board of Commissioners. All lighting shall comply with the standards of the Illuminating Engineering Society (IES) of North America." *The only proposed lighting shown on the plans are wall-mounted lights on the buildings. Lighting shall be provided in the parking areas, along the driveways, in the community building area, and at the pump station.*

Response: The lighting will be revised and submitted under separate cover.

94. Per Section 390-57.E., "Protection. Where the study shows the existence of wetland areas, the delineated boundary shall be properly fenced to prevent encroachment. Snow fence or other acceptable material shall be used (the use of silt fence is not acceptable). The fence shall be properly installed, at a minimum distance of 20 feet outside the delineated boundary, prior to any construction or issuance of building permits. No land shall be disturbed within any required buffer area except in accord with Township requirements. The fence must be properly maintained until all occupancy permits have been issued and/or for the extent of all construction." *It appears that a permanent fence is proposed around the wetlands, but the plans do not contain any detail or information on the fence itself. The required snow fence shall be provided on the Erosion & Sedimentation Control Plans and its installation included in the construction sequence. The response*

letter states, "The plans have been revised accordingly." While the plans have been revised to reflect the fence, there is disturbance shown within the required buffer area, which is not permitted.

Response: A detail for the wetland protection fence is shown on Sheet 54. The wetland protection fence is now contained in the construction sequence.

95. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:
- a. Section 390-58.3.B.(1), "This §390-58 shall apply to any subdivision for which a preliminary plan or a combined preliminary/final plan and any land development for which a plan is submitted after the effective date of this §390-58."
 - b. Section 390-58.C.(1), "The proposal for common open space, installation of recreation facilities and/or fees shall be offered for review by the Planning Commission and the Pocono Township Park and Recreation Committee."
 - c. Section 390-59.F., "Fees. If the Board of Commissioners and the applicant agree that a proposed subdivision or land development will pay fees-in-lieu of dedicating open space, this fee shall be as established by the Township Fee Schedule, which may be updated by resolution of the Board of Commissioners."
 - d. Section 390-58.K., "Timing of nonresidential fees. Fees required by this §390-58 for any nonresidential subdivision or land development shall be paid prior to the recording of the final plan of a subdivision or land development, as applicable."

*The plans do not propose any open space to be dedicated to the Township, therefore, the Applicant shall pay the applicable in-lieu fees, as required by Section 390-58. Should it be determined that open space is required and a fee in-lieu-of will be provided, that fee will be \$392,000.00 (280 dwelling units * \$1,400.00).*

Response: Acknowledged.

OTHER ORDINANCE COMMENTS

96. Per Section 220-8.C., "Edges of newly created slopes shall be a minimum of five feet from property lines, ultimate/future right-of-way lines of streets, and easements to permit the normal rounding of the edge without encroachment on the abutting property, right-of-way, or easement." *The submitted plans propose grading less than 5 feet from property lines and shall be revised accordingly. A waiver has been requested to permit grading up to and beyond the property lines. The Township Planning Commission recommended approval of this waiver request at its meeting held on October 15, 2024 contingent on the applicant obtaining a temporary construction easement from the adjacent property owner for the proposed grading work. Easement documentation must be provided to the Township.*

Response: A proposed temporary construction easement is now shown on Record Plans. The easement proposes to include five feet minimum of the adjacent property on the East side of the site. Additionally, the easement description has been provided with this submission.

MISCELLANEOUS COMMENTS

97. Previous Comment 93 satisfied.
Response: Acknowledged.

98. The Applicant shall coordinate with the school district for school bus stops. *The response letter acknowledges this requirement.*
Response: Acknowledged.

99. Previous Comment 95 satisfied.
Response: Acknowledged.

100. Previous Comment 96 satisfied.
Response: Acknowledged.

101. Previous Comment 97 satisfied.
Response: Acknowledged.

102. Previous Comment 98 satisfied.
Response: Acknowledged.

103. The sign tabulations on Sheets 8, 9, and 10 do not match the signage as shown on the plan sheets and shall be revised accordingly. *The response letter states, "The sign tabulation has been revised." The Sign Tabulation for Phase 1 (Sheet 5) indicates 9 handicap accessible signs, but there appear to be 10 within this phase. The Sign Tabulation for Phase 2 (Sheet 6) indicates 2 stop signs, but there are 5 within this phase. The tabulations shall be revised to match the plans.*
Response: The sign tabulations have been revised to match the plans.

104. Previous Comment 100 satisfied.
Response: Acknowledged.

105. An R1-3P (All Way) sign should be added to each leg of the 3-way intersection south of Building 3. *The response letter states, "The plans have been revised accordingly." While a R1-3P sign has been added to the sign tabulation, it is incorrectly specified. In accordance with the MUTCD, the R1-3P sign is a supplemental plaque to be mounted below each Stop Sign. The plans shall be revised accordingly and the correct size of the sign specified.*
Response: The sign tabulation has been revised accordingly, and the correct size of the sign has been specified.

106. All Record Plans shall reflect all required dimensioning of proposed improvements, including the driveway widths. *The response letter states, "The required dimensioning is now provided." The driveway between Buildings 1 and 2 is still not dimensioned. Additionally, the location where the width of the driveway changes must be identified.*

Response: The driveway between Buildings 1 and 2 is now dimensioned on Sheet 6.

107. The Overall Existing Features Plan (Sheet 11) reflects five (5) cleanouts (c/o) on the northern portion of the site; however, these are not shown on the detailed plan sheets. These shall be clarified. *The response letter states, "The cleanouts have been clarified as To Be Removed." The purpose of the cleanouts must still be identified, i.e., what they are/were used for.*

Response: The building cleanouts have been removed from the plans.

108. The Overall Existing Features Plan (Sheet 11) reflects five (5) small circles with the label "SP" on the southwestern portion of the site; however, it is unclear as to what they represent, and they are not shown on the detailed plan sheets. These shall be clarified. *The response letter states, "The standpipes have been clarified as To Be Removed." The purpose of the standpipes must still be identified, i.e., what they are/were used for.*

Response: The standpipes have been removed from the plan.

109. An existing well is shown on Sheet 11 near the wetland area. The disposition of the well shall be addressed on the plans. *The response letter states, "The well is now shown as To Be Abandoned." A note shall also be added to the plans stating that copies of the PADEP well abandonment forms shall be provided to the Township.*

Response: A Well Abandonment Note has been added to Sheet 8 in the upper left quadrant of the sheet.

110. Several stone and material stockpiles are shown to be encroaching onto the eastern side of the subject property on Sheet 11. The applicant shall clarify the disposition of these stockpiles as they are not addressed on the Grading or Erosion and Sedimentation Control plans. *The response letter states, "The stone stockpiles have been clarified as To Be Removed." The "TBR" is not legible on Sheet 7 as it is overwritten by other text. This shall be corrected.*

Response: The overwritten text has been revised.

111. The 100-year floodplain is shown to be at elevation 848.00 and is depicted to be at a lower elevation than the "water" line of the pond on the adjacent property on Sheet 11. This elevation does not match the FEMA mapping for this location. The design engineer shall review the floodplain elevation and its depiction and revise accordingly. *The response letter states, "The plans have been revised accordingly." The floodplain is now missing from the Existing Features Plans and must be added back onto the plans.*

Response: The floodplain has been added back to the Existing Features Plans.

112. Previous Comment 108 satisfied.

Response: Acknowledged.

113. Previous Comment 109 satisfied.

Response: Acknowledged.

114. A temporary construction easement is required for the storm sewer and endwall EW-100 located on the adjacent Belanger property. An additional permanent easement may also be required. It is recommended that an enlargement of the proposed work be shown within the grading plans. *The response letter states, "The Applicant is working with the neighboring property owner to obtain an extended permanent stormwater easement to the limit of the pond and also a temporary construction easement to permit tie-in grading and for the defined swale between the pipe outfall and the pond."*
Response: An additional permitted easement for stormwater conveyance has been shown on the plans, along with the legal description. Please note that the discharge pipe has been extended per the engineer's meeting and a cable concrete lined swale is shown to the edge of the pond.
115. The grading plans must clearly reflect how each phase of the project will be graded and how the grading will tie together from one phase to the next. The plans, as presented, have a lot of overlapped information instead of true matchlines. Also, the grading is inconsistent between the proposed community building and matchline A-A on several plan sheets. *The response letter states, "The plans have been revised accordingly." The grading for each of the 2 phases continues to be somewhat unclear. Driveway grading is shown depicting a curbline on Sheets 12 and 13, but no curb is proposed. Also, the E&S plans Sheet 43 depicts NAG SC150 matting in an area that is not shown to be graded as part of Phase 1 on the grading plans. It is unclear as well, if Inlet I-601 is proposed to be installed as part of Phase 1 because it is not shown on Sheet 13. Additional clarification of the phases must be provided.*
Response: All site grading and curbing is proposed to be done in Phase 1 of the land development. The erosion and sedimentation controls are proposed to be done in two phases, separate from the land development phasing. Phase 1 of the erosion and sedimentation controls is proposed to have two stages and Phase 2 is proposed to only have one stage. Additional sheets have been added to the E&S plans and each have been labeled accordingly.
116. The grading plans must be revised to show spot elevations at critical grade points including, but not limited to, high points, low points, building corners, and ADA routes. *The response letter states, "Spot elevations are now shown at critical grade points." While some spot elevations have been added, there are still spot elevations missing. Specifically, high points, low points, and ADA routes must be addressed.*
Response: More spot elevations have been added to the plans. Two sheets, Sheet 17 and 18 have been added to the plan set as Spot Grade plans.
117. Previous Comment 113 satisfied.
Response: Acknowledged.
118. Previous Comment 114 satisfied.
Response: Acknowledged.
119. Previous Comment 115 satisfied.

Response: Acknowledged.

120. Previous Comment 116 satisfied.

Response: Acknowledged.

121. Previous Comment 117 satisfied.

Response: Acknowledged.

122. Previous Comment 118 satisfied.

Response: Acknowledged.

123. Previous Comment 119 satisfied.

Response: Acknowledged.

124. The Proposed Access Drive and Proposed Parking Lot Typical Cross Sections detail on Sheet 36 is missing the depiction of the curb. The detail shall be corrected. Additionally, the detail reflects a cross sectional width of 24 feet; however, the drive appears to be up to 34 feet wide in some areas. The detail shall reflect the actual proposed driveway widths or noted to vary. *The detail (now on Sheet 34) has been updated; however, notes A, B, C, D, and E are missing from the detail and must be added.*

Response: Notes A, B, C, D, and E have been added below the detail on Sheet 35.

125. Previous Comment 121 satisfied.

Response: Acknowledged.

126. Previous Comment 122 satisfied.

Response: Acknowledged.

127. Previous Comment 123 satisfied.

Response: Acknowledged.

128. The Concrete Top Unit details on Sheet 39 reference Notes 4 and 5 which do not appear on this plan sheet. The references shall be corrected. *The response letter states, "The references have been included." The details, now on Sheet 37, still reference Note 4 which does not appear on the plan. The reference must still be corrected.*

Response: Note 4 has been provided on Sheet 38 below the Concrete Top Unit – Type M detail.

129. Sheet Previous Comment 125 satisfied.

Response: Acknowledged.

PLAN REVISION COMMENT

130. Two (2) signs are shown on the east side of the driveway near STA 6+00 and STA 7+50 on Sheet 4; however, these signs are not shown on the Record Plan Sheets 5 or 6. The signs must be shown and labeled.
Response: The signs are now shown and labeled on Sheet 6.
131. The overall record plan shall reference the proposed project phasing.
Response: The proposed project phasing is noted on the Record Plans.
132. Additional speed limit shall be added to both sides of the driveway between STA 6+00 and 12+00.
Response: Two more speed limit signs have been added to each side of the driveway.
133. Signs G and H are missing from Sheet 5 at STA 4+90. Even if they are part of Phase 2, they need to be depicted somewhere on the plans.
Response: Signs G and H have been added to Sheet 6 at STA 4+90.
134. Interstate I-80 shall be labeled on Sheets 6, 8, 9, 12, 13, 15, 19, 23, 42, 43, 45, 50, 51, 52, and 53.
Response: Interstate I-80 has been labeled on all the sheets listed above.
135. The source and date of survey information shall be provided.
Response: The source and date of survey information has been added to the General Notes, Sheet 2.
136. Depressed curb location such as at the emergency access points and the dumpster locations (with curb) must be identified on the plans.
Response: The locations of depressed curb have been identified on Sheets 6 and 7.
137. The hatched area behind Building 6 as shown in the plans set is neither labeled nor shown in the legend. The hatching must be identified.
Response: The hatched area behind Building 6 has been labeled on Sheet 7.
138. Numerous plans show what appears to be the spray irrigation system; however, it is neither identified nor shown in a plan legend. The identification must be made on all sheets where this linework appears.
Response: The legend for the spray irrigation system has been added to all applicable sheets including the Grading Plans, Utility Plans, Landscape Plans, E&S plans, and PCSM plans.
139. The proposed 893 and 894 contours near STA 5+00 appear to be incorrect on Sheet 12. It is unclear as to how the sidewalk will be constructed with this steep slope.
Response: The proposed 893 and 894 contours have been corrected.
140. Proposed 888 contour on Sheet 12, to east of future driveway, is incorrectly tied into two (2) other proposed 888 contours. This must be corrected.

Response: The proposed 888 contour has been corrected.

141. It is unclear in what phase(s) the community building, pool/deck, pavilion will be constructed. The community building and pool/deck are shown on Sheets 12 and 14 in the same linetypes, while the pavilion is shown only on Sheet 14 with a light grey linetype. The construction phase assignments for these amenities shall be clarified.

Response: The community building and pool/deck will be constructed in phase 1. The pavilion will be constructed in phase 2. The pavilion is now shown in a darker line type on Sheet 15.

142. The proposed 907 contours in the parking area north of Building 4 on Sheet 15 do not appear to be correct.

Response: The proposed 907 contours have been corrected.

143. Note 4 on Sheet 20 shall be revised to also reflect the ordinance required separation distance of 6' minimum from any other underground utility.

Response: Note 4 on Sheet 22 has been revised to state that the required separation distance of 6' minimum from any other underground utility.

144. Sheets 21-23 contain information in the lighting table regarding parking and drives, but there is no lighting or details shown on the plans related to this. The lighting information and details shall be added to the plan sheets.

Response: The lighting will be revised and submitted under separate cover.

145. The Reserved Parking Space Detail on Sheet 34 shows a R7-8F fine sign which is not noted in the sign tabulation on Sheets 5 and 6. Additionally, the sizes of other signs in this detail do not match the sizes in the tables on Sheets 5 and 6. All references shall be consistent throughout the plan set.

Response: The R7-8F sign has been added to the sign tabulations on sheets 5, 6, and 7. The sizes of the signs have been revised to match the details.

146. Sheet 34 has two (2) different handicap parking space details with the same name. The plans do not depict any 10' wide handicap parking spaces as shown in one of the details. The engineer shall clarify usage of each detail.

Response: The handicap parking space detail has been updated on Sheet 35.

147. Sign references in the tables on Sheet 5 and 6 and the sign details on Sheet 35 shall be updated to reflect the MUTCD standards.

Response: The sign references on Sheets 5, 6, and 7 have been updated to reflect the MUTCD standards.11

148. A combined curb and gutter detail is shown on Sheet 35. It must be clarified on the plans where this is to be used.

Response: The combined curb and gutter detail has been removed.

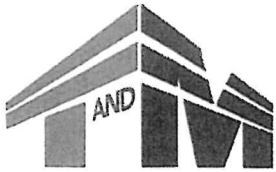
149. The legend on the E&S plans contain line types for both the NPDES Permit boundary and Limit of Earth Disturbance, but neither line type appears on the plan view. The NPDES Permit boundary and Limit of Earth Disturbance shall be clearly depicted on the plans using the legend line types.
Response: The NPDES Permit boundary and Limit of Earth Disturbance are depicted on all E&S and PCSM sheets.
150. On Sheet 43, the end of Swale 2 appears to encroach beyond the limit of disturbance. The LOD may need to be adjusted.
Response: The LOD has been adjusted to include Swale 2.
151. Compost filter socks are shown to be encroaching beyond the limit of disturbance throughout the E&S plans. The LOD line should be revised to be behind the compost filter socks.
Response: The LOD has been revised to include the compost filter socks.
152. The proposed tree line (as cleared by removals) appears to be located beyond the limit of disturbance on the E&S plans. The LOD should be revised to be at or behind the "proposed tree line".
Response: The LOD has been revised to be behind the proposed tree line.
153. Proposed grading is shown beyond the limit of disturbance on the E&S plans. The LOD line should be revised to be behind the proposed grading limits.
Response: The LOD has been revised to include all proposed grading limits.
154. Sequence of BMP Construction Note 3 on Sheet 48 incorrectly reference Lehigh County Conservation District instead of Monroe County and must be revised accordingly.
Response: The Sequence of BMP Construction Note 3 has been revised to reference Monroe County Conservation District.
155. The Sequence of BMP Construction does not reference any proposed project phasing. The sequence must be specifically written to include the proposed phasing as identified in the plan set.
Response: The Sequence of BMP Construction has been revised to include phasing and staging throughout the completion of the project.

Sincerely,

KEYSTONE CONSULTING ENGINEERS, INC.



Alan R. Fornwalt, P.E.



YOUR GOALS. OUR MISSION.

April 8, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: SWIFTWATER SOLAR PRELIMINARY/FINAL LAND DEVELOPMENT PLAN
AMENDED PLAN REVIEW NO. 2 –PHASE B STORMWATER MANAGEMENT
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1375, T&M PROJECT NO. POCO-R0624**

Dear Planning Commission members:

Pursuant to the Township's request, we have performed our second review of the Amended Preliminary/Final Land Development Plan for Swiftwater Solar. The submitted information was prepared by Timmons Group and consists of the following items.

- Amended Preliminary/Final Land Development Plan dated September 24, 2021, revised April 2, 2025.
- E&S Report and Compliance Narrative dated May 28, 2021, revised April 2, 2025.
- PCSM Report and Compliance Narrative dated May 28, 2021, revised April 2, 2025.

BACKGROUND INFORMATION

The site is located east of Interstate Route 380 (SR 0380), north and adjacent to Sullivan Trail Road (SR 4004) and Back Mountain Road, west of Summit Road and south of Swiftwater Creek. The property is located within the RD, Recreation Zoning District. The Applicant is leasing Tax Map Parcel 12/16/1/, 1 and a large portion of Tax Map Parcel 12/111903 for the project. The total leased area of the site is 643.99 acres, of which 471.20 acres are proposed to be disturbed. The site consists of woodlands, steep slopes, wetlands, a pond, and an existing private road which takes access from Back Mountain Road. Parcel 12/111903 has Floodway and Floodplain Area along Swiftwater Creek; however, the Floodway and Floodplain are outside of the leased area of the site.

The proposed development will include the construction of a fenced enclosure, solar panel fields, a substation, gravel access roads, underground electric lines, and sixteen (16) infiltration detention basins. The site drains to three different watersheds: Swiftwater Creek to the North, Dry Sawmill Run to the Southwest, and Scot Run to the Southeast. Access to the property will be via a single driveway entrance from Back Mountain Road. Water and sewer service are not proposed for this project.

This amended plan removes the bulk site grading and includes impervious areas such as the MV Skids and the substation.



This review includes Zoning Ordinance and Subdivision and Land Development Ordinance Comments related to the entire project site, and comments related to the stormwater management design in Phase B only. Separate reviews will be provided for Phases A, C, and D.

Based on our review of the above information and our previous review letter dated February 7, 2025, all previous engineering comments have been satisfied. The remaining comments are related to previously approved waivers and outside agency approvals.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Comments 1 through 6 discuss waivers there were previously requested from the Subdivision and Land Development Ordinance and approved by the Board of Commissioners at its meeting held on June 6, 2022.

1. In accordance with Section 390-48.H.(1), “wherever there exists a dedicated or platted portion of a road or alley along a boundary of the tract being subdivided or developed the remainder of said road or alley shall be platted to the width required by this chapter based on the classification of the road within the proposed development”. *(Previous Comment 1) A waiver from Section 390-48.H.(1) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not required widening of Sullivan Trail and Summit Road. This amended plan does not change or provide access to and does not change the volume of traffic along Sullivan Trail or Summit Road.*
2. In accordance with Section 390-48.K.(2), “the private access road shall not exceed 750 feet in length as measured from the edge of the right-of-way of the abutting road to the point of connection to the lot. The width of the private access road shall conform to Table 390-48-1. Any proposed road exceeding the seven-hundred-fifty-foot length shall comply with all normal standards which apply to road construction.” *(Previous Comment 2) A waiver from Section 390-48.K.(2) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the proposed private access road to be longer than 750-feet and to not meet the requirements of Table 390-48-1. This amended plan does not revise the proposed private access road.*
3. In accordance with Section 390-50.D.(4), “the maximum water depth, measured from the invert of the lowest outlet orifice to the peak one-hundred-year water surface elevation, shall not exceed five feet”. *(Previous Comment 3) A waiver from Section 390-50.D.(4) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the stormwater stored in the proposed basins to have a depth greater than 5-feet. The basin design in Phase B of this Amended Plan does not alter the previous request.*
4. In accordance with Section 390-50.D.(5), “the maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical”. *(Previous Comment 4) A waiver from Section 390-50.D.(5) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the grading at the proposed basins to exceed a slope of 4:1. The basin design in Phase B of this Amended Plan does not alter the previous request.*
5. In accordance with Section 390-50.D.(7), “the minimum top width of the detention basin berm shall be 10 feet”. *(Previous Comment 5) A waiver from Section 390-50.D.(7) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not require a berm width of 10-*



feet in cut sections. The basin design in Phase B of this Amended Plan does not alter the previous request.

6. In accordance with Section 390-50.D.(8), “in order to ensure proper drainage on the basin bottom, a minimum grade of 2% shall be maintained for areas of sheet flow. For channel flow, a minimum grade of 1% shall be maintained.” *(Previous Comment 6) A waiver from Section 390-50.D.(8) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit flat bottom basins. The basin design in Phase B of this Amended Plan does not alter the previous request.*
7. In accordance with Section 390-51.A, “all soil erosion and sedimentation control plans shall meet the specifications of the Monroe County Conservation District and PA DEP, and shall comply with Commonwealth of Pennsylvania, Title 25, Chapter 102, Department of Environmental Protection regulations for soil erosion and sedimentation control”. *The amended Land Development Plan shall meet the requirements of Chapter 102 and will require an amendment to the existing NPDES Permit. (Previous Comment 7) A Minor Amendment was issued under cover letter dated March 12, 2025. The April 2, 2025 revised plan should be provided to the County Conservation District for its review. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.*

STORMWATER MANAGEMENT ORDINANCE COMMENTS

Comments 10 and 11 discuss waivers there were previously requested from the Stormwater Management Ordinance and approved by the Board of Commissioners at its meeting held on June 6, 2022.

- 8.-9. Previous Comments 8 and 9 satisfied.
10. In accordance with Section 365-11.A.(3), the size of the recharge facility shall be based on the volume criteria in Subsection (a). *(Previous Comment 10) A waiver from Section 365-11.A.(3) were granted by the Board of Commissioners at its meeting on June 6, 2022 to permit the use of the PADEP water quality spreadsheets to satisfy this requirement. The basin design in Phase B of this Amended Plan does not alter the previous request.*
11. In accordance with Sections 365-13.B and D, “all calculations consistent with this chapter using the Soil Cover Complex Method shall use the appropriate design rainfall depths for the various return period storms according to the region in which they are located as presented in Table B-1 in Appendix A¹¹ of this chapter”. *(Previous Comment 11) Waivers from Sections 365-13.B and 365-13.D were granted by the Board of Commissioners at its meeting on June 6, 2022 to permit the use of the NOAA rainfall data. The basin design in Phase B of this Amended Plan does not alter the previous request.*
12. Previous Comment 12 satisfied.
13. In accordance with Section 365-15, “for all regulated earth disturbance activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated earth disturbance activities (e.g., during construction) to meet the purposes and requirements of this chapter and to meet all requirements under Title 25 of the Pennsylvania Code and the Clean Streams Law. Various BMPs and their design standards are listed in the Erosion and



Sediment Pollution Control Program Manual (E&S Manual3), No. 363-2134-008, as amended and updated.” *The amended Land Development Plan shall meet the requirements of Chapter 102 and will require an amendment to the existing NPDES Permit. (Previous Comment 13) A Minor Amendment was issued under cover letter dated March 12, 2025. The April 2, 2025 revised plan should be provided to the County Conservation District for its review. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.*

STORM SEWER AND STORMWATER MANAGEMENT DESIGN COMMENTS

14.-15. Previous Comments 14 and 15 satisfied.

MISCELLANEOUS COMMENTS

16.-17. Previous Comments 16 and 17 satisfied.

The above comments are related to previously approved waivers and outside agency approvals. We recommend the Township approve Phase B with conditions.

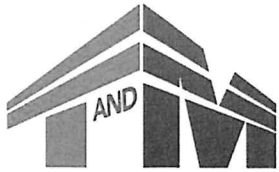
If you should have any questions regarding the above comments, please call me.

Sincerely,

Jon S. Tresslar, P.E., P.L.S.
Township Engineer

JST/meh

cc: Jerrod Belvin, Manager – Pocono Township
Lindsay Scerbo, Zoning Officer – Pocono Township
Leo DeVito, Esquire – Township Solicitor
Lisa Pereira, Esquire – Broughal & DeVito, LLP
Daniel Jamison, P.E., Timmons Group
Colby Dechiara, Timmons Group
Amanda Mills, Narenco
Ralph A. Matergia, Esquire
David Velasco, VC Renewables
James M. Cahill, Pocono Mountain Investors
Kristina Heaney, Manager – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates



YOUR GOALS. OUR MISSION.

February 13, 2025

Patrick Briegel, Director of Public Works
Pocono Township
112 Township Drive
Tannersville, PA 18372

**SUBJECT: TRAP ENTERPRISES, LLC- TRAPASSO HOTEL EVENT CENTER
PRELIMINARY/FINAL MAJOR SUBDIVISION AND LAND DEV. PLAN
SANITARY SEWER SYSTEM REVIEW NO. 1
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1438, T&M PROJECT NO. POCS-R0019**

Dear Mr. Briegel:

Pursuant to the Township's request, we have completed a review of the proposed sanitary sewer system for the above-referenced project. The following information was submitted for our review:

- Preliminary/Final Major Subdivision and Land Development Plan (23 sheets) prepared by Pennoni, dated December 13, 2024.
- Letter from Pennoni including sewage generation calculations.

BACKGROUND INFORMATION

The Applicant, Trap Enterprises, LLC, is proposing a subdivision and land development at property located on the western side of State Route 0611, adjacent to and including lands of the existing Desaki restaurant and Swiftwater Hotel.

The proposed subdivision includes the consolidation of three (3) existing parcels; Existing Lot 1, Existing Lot 3, and the former Birch Street parcel. Existing Lot 1 has an area of 5.44 acres, is located within the C, Commercial Zoning District, and consists of the Desaki restaurant and Swiftwater Hotel with associated parking and access from State Route 0611 through the former Birch Street parcel. Existing Lot 3 has an area of 4.57 acres, is located within the R-D, Recreation Zoning District, and consists of woodlands. Existing Lot 3 was also utilized to stockpile material from the recent construction of the Swiftwater Hotel and is accessed through the former Birch Street parcel. The former Birch Street parcel has an area of 0.25 acres, is located within the C, Commercial Zoning District, and includes driveway access to Existing Lots 1 and 3 from State Route 0611.

The proposed consolidation of Existing Lot 1, Existing Lot 3, and the former Birch Street parcel will create Proposed Lot 1A having an area of 10.26 acres. The existing Desaki restaurant, Swiftwater Hotel, and driveway accessing State Route 0611 will remain.



The proposed development consists of the construction of a 10,050 square foot event center on the former Existing Lot 3. The project site is already connected to the gravity sanitary main along the frontage of this property on S.R. 0611. The site has an existing sanitary sewer easement and proposes another for the new line. The project is located within Sub Area 5-9, conveying sewage flows to Pump Station 5.

Based on the cover letter provided by the applicant's Engineer, the project will generate 4,200 gpd of sewage based on 14 gpd/seat, or 17 EDUs. Prior to a building permit being issued for the structure, a tapping fee of \$63,750.00 must be paid.

Based on our review of the submitted information, we offer the following:

SEWAGE PLANNING:

1. A Capacity Reservation Application shall be provided or the capacity shall be purchased.
2. An application fee in the amount of \$150.00 is required for the review of Act 537 Sewage Planning documents for projects connecting to the public system. The fee must be provided to the Township prior to the review of planning documents.
3. A "Will Serve" letter must be prepared by BCRA and Pocono Township for water and sewer services. However, these letters cannot be provided until the Applicant either reserves the capacity consistent with the Township and BCRA Capacity Reservation Policy or directly purchases the capacity.
4. This project will require Sewage Planning approval. This project will likely qualify for a Sewage Exemption. The sewage exemption package shall be submitted in triplicate including the following information to be send on to the PA DEP by the Township:
 - a. Completed PNDI Search Form;
 - b. PA DEP Sewage Planning Mailer;
 - c. Signed and sealed site and utility plans;
 - d. USGS Location Map;
 - e. Capacity Commitment letter from BCRA for Water Supply and Treatment capacity at the Regional WWTP;
 - f. Sewage Generation Narrative.

Note that the sewage planning exemption package can not be sent to the PA DEP until the sewage capacity is either purchased or reserved.

TECHNICAL COMMENTS:

5. The project proposes a facility with a kitchen. An exterior grease trap shall be provided. The plans shall be revised to include the construction details and the placement of the grease trap. Additionally, grease trap sizing calculations shall be provided or a notation added to the detail referencing sizing calculations to be provided consistent with Township Rules and Regulations as part of Shop Drawing review.



6. Plan Sheet CS0001:
 - a. In the Utility Users List, replace LVL Engineering Group contact information with: Pocono Township, 112 Township Drive, Tannersville PA 18372, 570-629-1922.
7. Plan Sheet CS0002:
 - a. General Utility Note 10 states “all pipe lengths and distances between structures are measured from center of structure to center of structure”. This note shall be modified and all sanitary sewer lengths shall be measured face of structure to face of structure.
8. Plan Sheet CS0201:
 - a. Note 12 references removal of the on-site septic system. This system no longer exists; therefore, the note shall be removed from the plan.
9. Plan Sheet SC1001:
 - a. The Township’s Sanitary Sewer Easement along SR 0611 shall be added to the plan.
10. Plan Sheet CS1701:
 - a. The plan calls for a sanitary sewer easement. The proposed sanitary line is to service the proposed development exclusively and as such, will not be dedicated to the Township. Therefore, the proposed sanitary easement shall be deleted from the plans.
 - b. Provide invert in and out elevations obtained from a field survey and rename manholes for the following existing manholes:
 - i. EX SSMH-5, to be renamed MH B1-1-08.
 - ii. Existing manhole down slope of Proposed Manhole MH-1, to be named MH B1-1-09.
 - iii. The invert of proposed Manhole shall be renamed MH B1-1-09A and shall have its invert updated based on actual field survey of existing connecting manhole inverts.
 - iv. The slope of the private sewer mains are flat in some sections, the slopes shall be revised to maximize pipe slope from the connection in SR 0611 to the proposed building to the fullest extent possible.
11. Plan Sheet CS4002:
 - a. The plan includes the Township’s general generic notes. Certain notes are not applicable to this project and should be removed.
 - b. General Sanitary Sewer Construction Note 24: Change “Boucher & James, Inc.” to “T&M Associates.”
 - c. Township sewer minimum cover of 4’-6” is not maintained throughout the sewer main. The main shall be revised to provide adequate cover.
12. Plan Sheet CS6002:
 - a. Sanitary Sewer Details shall be removed and replaced with Township standard details. Note that the only manhole to have the raised “Pocono Township” lettering is the proposed manhole in SR 0611.



We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to plan approval.

To facilitate an efficient re-review of revised plans, the Design Engineer shall provide a response letter, addressing the above item-by-item.

Sincerely,

Michael E. Gable, P.E.
Sanitary Sewer Engineer

MEG/ks/arm

cc: Jerrod Belvin – Township Manager
Lindsay Scerbo – Township Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Trap Enterprises, LLC – Property Owner/Applicant
Thomas John Serpico, P.E. – Pennoni Associates, Inc – Applicant's Engineer
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates
David Horton, P.E. – BCRA

March 24, 2025

Monroe County Conservation District
8050 Running Valley Road
Stroudsburg, PA 18360

Attn: Kristina Heaney, District Manager

**RE: Incompleteness Letter
Monroe County Transit Authority (MCTA) Facility
NPDES Permit Application No. PAD450224
Pocono Township, Monroe County**

Dear Ms. Heaney,

We have reviewed your incompleteness letter for the MCTA Facility NPDES Permit Application No. PAD450224 and are providing the following responses to your comments. The original comments are listed below followed by our responses in bold face text.

1. *§102.4(b)(5)(viii) Supporting calculations and measurements.*

- a. Please provide calculations for the erosion control mattings utilized on the project, indicating the linings specified are stable for the anticipated and/or channel conditions.

Response: The erosion control mattings are specified to meet the requirements outlined in PennDOT Publication 408, Section 806. These specifications are based on an analysis of matting stability. These standards are included on Sheet C147.3 of the E&S Plans. Rolled Erosion control products are specified for 2:1 and 3:1 slopes as indicated in the 408 specifications. No erosion control mattings are proposed for concentrated flow areas. Concentrated flow areas are stabilized with Riprap. The riprap calculations are included in the E&S support calculations document.

2. *§102.6(a)(1) Submit to the Department or a conservation district a complete application or NOI, an E&S Plan meeting the requirements of § 102.4 (relating to erosion and (relating to PCSM requirements), and other information the Department may require.*

- a. NPDES Application, Stormwater Discharge Information: Please update the "Ch 93 Class." Column values to "HQ-CWF, MF".

Response: The Chapter 93 Classification has been updated in Block 1 and Block 2 of the Stormwater Discharge Information on Page 6 of the NOI.

- b. General Information Form, Page 4: The project is subject to the Land Use policy. Please update the answer to item 5 and fill out the Land Use information section of the form.

Response: Item 5 and the Land Use information section has been completed.

- c. PHMC clearances are required for projects which disturb more than 10 acres. Please provide evidence of submission to PHMC. Any potential impacts would need to be resolved prior to permit issuance.

Response: The PHMC clearances have been included in this submission in folder 3, PNDI & PHMC.

3. *§102.8(f)(8) Supporting calculations.*

- a. Module 2, Stormwater Analysis-Runoff Volume: Please check box 2 and uncheck box 1. In addition, since box 4 is checked, items 5-9 may be left blank. Please revise.

Response: Box 1 and 2 of the Stormwater Analysis – Runoff Volume section of Module 2 has been updated.

- b. Module 2, Stormwater Analysis-Peak Rate: Please check box 1 and uncheck boxes 2 and 4. Please note the values in the tables may also change based on addressing the comments in this letter.

Response: Box 1, 2, and 4 have been revised in the Stormwater Analysis – Peak Rate section of Module 2.

- c. The Downstream Analysis in the PCSM Report (Appendix I) should include a summary of the predevelopment and post development flows to the non-surface water drainage paths and should comment on whether the drainage paths are currently stable in the predevelopment condition, and whether the paths will remain stable in the post development condition.

Response: A detailed analysis of flows to the non-surface water discharge path has been provided in Appendix I Section I-2. This analysis is summarized in Section VII of the PCSM Report which also includes a statement related to discharge path stability.

4. *§102.8(g)(2) Analysis demonstrating that the PCSM BMPs will meet the volume reduction and water quality requirements specified in an applicable Department approved and current Act 167 stormwater management watershed plan; or manage the net change for storms up to and including the 2-year/24-hour storm event when compared to preconstruction runoff volume and water quality.*

- a. PCSM Spreadsheet, General Tab: “The Earth Disturbance in DA (acres)”

column should total the total Earth disturbance for the project (10.71 acres). Please revise.

Response: The “Earth Disturbance in DA (acres)” column has been updated on the General Tab of the PCSM Spreadsheet.

- b. PCSM Spreadsheet, Volume Tab: The impervious values utilized in the spreadsheet are significantly different that the rate analysis for the project. Resolution of the impervious areas is required between the rate and volume analysis. The change in impervious surface (post-pre) should be the same in the rate and volume analysis.

Response: The impervious values used in both the PCSM spreadsheet and peak rate analysis have been updated. The total impervious area in the PCSM spreadsheet Volume and Water Quality tabs is 5.21 acres. The total impervious are in the peak rate analysis is 5.35 acres. This slight difference results from the inclusion of area outside the LOD in the peak rate analysis.

- c. PCSM Spreadsheet, Volume Tab: The post development impervious land cover utilized is applicable to a residential project. A Commercial or Industrial land use cover should be utilized in the spreadsheet to more accurately model the potential pollutant loading from the facility.

Response: The post development impervious cover condition has been revised to “Impervious Areas: Industrial” in the Post-Construction land cover block of the Volume Tab in the PCSM Spreadsheet.

- d. The following comments relate to the MRC Basin design:

- i. The MRC Design Summary notes that the outflow from the underdrain (0.04 cfs) does not meet the release rate (0.03 cfs).

Response: The underdrain orifice size has been decreased, and the release rate is now 0.03 cfs. See Appendix A, Section A-1 of the PCSM Report.

- ii. Calculations are required to support the equivalent impervious area and the calculated release rate for the 1.2”/2-hour storm.

Response: The calculations are embedded in the spreadsheets on the 3rd and 4th pages of the MRC worksheets in Appendix A, Section A-1.. We have added a detailed calculation for the equivalent impervious area and depth of ponding for the 1.2”/2-hour storm to the 4th page of the MRC worksheet in Appendix A-1.

- iii. Routings for the MRC basin should be provided for all of the design storms to the basin and should include the underdrain discharge and soil media of the basin.

Response: The basin modeling documented in Appendix C-5 has been updated to include all required design events. The MRC basin modeling includes consideration of a storage volume in the amended soil as well as underdrain outflows controlled by the upturned elbow and orifice. See PCSM Report page 15 and Appendix C-5.

- iv. Calculations should be provided justifying the dewatering times for each of the design storms to the MRC basin.

Response: Calculations for dewatering times are included in Appendix A-3 on the first page. Notes have been added to the dewatering table identifying where the numbers come from and how the values are calculated.

- v. The 1-year predevelopment rate should be from the area contributing runoff into the MRC basin in the predevelopment condition.

Response: The 1-year predevelopment rate calculation in Appendix A-2 has been updated. We also included a drainage area map with cover conditions to support the analysis.

- 5. *§102.8(g)(3) Analysis demonstrating that the PCSM BMPs will meet the rate requirements specified in an applicable Department approved and current Act 167 stormwater management watershed plan; or manage the net change in peak rate for the 2-, 10-, 50-, and 100-year/24-hour storm events in a manner not to exceed preconstruction rates.*

- a. The project is located in Management District B-2 of the Brodhead McMichael Act 167 plan, requiring peak rate reductions for each design storm. District B-2 requires reductions to the 5 year and 25-year storm, as well as the design storm results provided. Please update the PCSM report to include these design storms and to indicate compliance with the Act 167 plan.

Response: The PCSM report has been updated to include the 5-year and 25-year design storms and illustrates all peak rate reductions per the Brodhead McMichael Act 167 Plan. See Section VI, Page 13 of the PCSM report and Appendix C.

- b. The rate analysis is based on a total area of 9.07 acres. However, the total earth disturbance for the project is 10.71 acres. The rate control analysis

should, at a minimum, equal the disturbed area of the project. Please revise.

Response: The rate control analysis has been updated to include the entire disturbed area and upstream areas tributary to the existing stormwater management facility. See Drainage Area Maps in Attachment 2 and Attachment 4, and analysis in Appendix C of the PCSM Report.

- c. The post development curve number calculations utilize a land use of “Developed-Roadside Cut/Fill”. This area is not shown on the drainage area mapping and is not a common land use utilized for the rate analysis. Please identify this area and provide justification for the curve number value utilized.

Response: The “Developed-Roadside Cut/Fill” land use in the original submission was used for the riprap lined channel and riprap slope protection. To be conservative, the riprap areas have been revised as impervious land use. See Proposed Conditions Weighted CN Calculations in Appendix C, Section C-4 and Proposed Drainage Area Map in Attachment 4.

- d. The post development curve number calculations utilize the land use of “Agricultural-Brush Good”, which is assumed to represent the meadow mix areas of the project. A Curve number for a meadow land use should be utilized for these areas. Please revise.

Response: The post-development curve number calculations have been updated to utilize the “Agricultural – Meadow” land use. The peak rate models have been updated with the new weighted CN value. See Proposed Conditions Weighted CN calculations in Appendix C Section C-4.

- e. The rate control analysis is based on a change in impervious surface of 2.18 acres (3.33 post minus 1.15 pre). This value differs from the PCSM Spreadsheet and NPDES Application, which indicates a change of impervious surface of 2.24 acres. The change in impervious surface should be the same in the rate and volume analysis and the NPDES Application. Please revise.

Response: The change in impervious surfaces has been updated in the peak rate model and in the PCSM Narrative (Section VI). The revised change in impervious area is 2.74 acres (5.21 acres post-development minus 2.47 acres pre-development). It now matches in the PCSM Spreadsheet and NPDES Application. See Appendix C-1 and C-4 (Weighted CN Calcs), Appendix B - DEP Worksheets, and NPDES Application.

6. *§102.8(h)(1) Evaluate and include nondischarge alternatives in the PCSM plan unless a person demonstrates that non discharge alternatives do not exist for the project.*
- a. Module 3: In both the E&S and PCSM Sections, please explain why the non-discharge alternatives were not selected, and why the non-discharge alternatives are not considered environmentally sound or cost effective.

Response: The E&S and PCSM Sections of Module 3 have been completed explaining why non-discharge alternatives were or were not selected.

If you have any questions or require additional information, please feel free to contact me at 814-862-9191.

Sincerely,
NTM Engineering, Inc.



Scott A. Brown, PE, D.WRE
Senior Project Manager

ecc: DEP NERO, c/o ra-epneroww@pa.gov

Pocono Township Supervisors, Planning Commission, Engineer and Zoning
Officer Eric Koopman, MCPC

File



MONROE COUNTY
CONSERVATION DISTRICT

Conserving Natural Resources for the Future

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February 19, 2025

Via Email: rschlameuss@gomcta.com

Richard Schlameuss
Monroe County Transit Authority
PO Box 339
Scotrun, PA 18355

Re: Extension Request Letter
Monroe County Transit Authority (MCTA) Facility
NPDES Permit Application No. PAD450224
Pocono Township, Monroe County

Dear Applicant:

The Monroe County Conservation District has received your written request on February 19, 2025 for an extension to provide the necessary information to make your application complete and technically adequate.

The District has reviewed your written request and hereby grants an extension of the timeline to submit the necessary information. All information necessary to make your application complete and technically adequate must be submitted by **March 25, 2025** or the District may consider the application withdrawn.

If you have questions about your application, please contact Michael J Wilk PE by e-mail at mwilk@monroecountypa.gov or by telephone at 570.629.3060 and refer to Application No. PAD450224.

Sincerely,

Kristina Heaney
District Manager
Monroe County Conservation District

ecc: Kevin Kozain PE, Scott Brown PE, NTM Engineering, Inc.
DEP-NERO
Pocono Township Supervisors, Planning Commission, Engineer and Zoning Officer
File