



POCONO TOWNSHIP PLANNING COMMISSION

AGENDA

June 9, 2025 6:00 p.m.

205 Old Mill Rd. | Tannersville, PA 18372

Meeting ID
899 1389 8705
Security
Passcode 593968

<https://us06web.zoom.us/j/89913898705?pwd=FypFWg81IRijmXulQ2Eq4LKicgXYxA.1>

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.

ANNOUNCEMENTS

- Zoning Ordinance, Zoning Map & SALDO Amendments
 - Review process will continue with Nanci Sarcinello, Sarcinello Planning & GIS Services along with the Board of Commissioners on the 4th Monday of June.
- Moment of Silence in honor of Marie Guidry, a long-time member of the Pocono Township Planning Commission with a long family history in Tannersville.

CORRESPONDENCE

OLD BUSINESS

- Motion to approve the minutes of the May 12, 2025 meeting of the Pocono Township Planning Commission. **(Action Item)**

SEWAGE PLANNING MODULES:

- Tannersville Point Sewage Planning Module **(Possible Action Item)**

SPECIAL EXCEPTIONS:

WAIVERS OF LAND DEVELOPMENT:

SKETCH PLANS

NEW PLANS

- Solar Electric Power Generation Facility – LDP 1446 (BlueWave Solar) Summit Road, Swiftwater, PA (**Possible Action Item**)

FINAL PLANS UNDER CONSIDERATION

- Camp Lindenmere Expansion of Existing Facilities – Dining Hall Expansion – (Revised Final LDP 1372A) (**Possible Action Item**)

PRELIMINARY PLANS UNDER CONSIDERATION

- MCTA Transit Facilities Expansion – (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of Sept 5, 2025. **Deadline for P.C. consideration is 8/11/25. (Possible Discussion & Action Regarding Waiver)**
- Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of August 30, 2025 **Deadline for P.C. consideration is 08/11/25. (Possible Action Item)**
- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9/24 P.C. meeting with approval deadline of July 21, 2025 **Deadline for P.C. consideration is 7/14/25. (Possible Action Item)**
- Mountain Edge Village Community Townhouses – LDP 1445 – Plans were administratively accepted at the 4/14/25 P.C. meeting. Approval deadline of October 31, 2025. **Deadline for P.C. consideration is 10/13/25. (Possible Action Item)**

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

- 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

UNFINISHED BUSINESS

NEW BUSINESS

PUBLIC COMMENT & ADJOURNMENT

POCONO TOWNSHIP PLANNING COMMISSION

Meeting Minutes

May 12, 2025

The regular meeting of the Pocono Township Planning Commission was held on Monday, May 12, 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, absent; Dennis Purcell, absent; Jeremy Sawicki, present; Kyle VanFleet, present.

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

Bruce Kilby is recognized as a voting member for this meeting as per J. Sawicki, Chairman.

IN ATTENDANCE

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

PUBLIC COMMENT

Cindy Gregor (Resident) Thanked the board for hearing their concerns regarding the SBA Tower LDP.

The Township offices will be closed to the public May 21st and May 22nd in order to begin facilitating the movement of files to the new building location.

The applicant has withdrawn the SBA Tower Project.

OLD BUSINESS

J. Folsom made a motion, seconded by C. Kauffman, to approve the minutes of the April 14, 2025 meeting of the Pocono Township Planning Commission. All in favor. Motion carried.

NEW PLANS

PRELIMINARY PLANS UNDER CONSIDERATION

- Trap Enterprises Event Center – (LDP 1438) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of Sept 10, 2025 **Deadline for P.C. consideration is 8/11/25.**

J. Sawicki made a motion, seconded by K. VanFleet, to recommend waiver §390.29.J.(6). All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Learn, to recommend waiver §390.29.K(3). All in favor. Motion carried.

C. Learn made a motion, seconded by J. Folsom, to recommend waiver §390.55.C.2.e. All in favor. Motion carried.

C. Learn made a motion, seconded by K. VanFleet, to recommend waiver §390.55.D.1.a & .e. All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Kauffman, to recommend waiver §390.55.F.3.e. All in favor. Motion carried.

K. VanFleet made a motion, seconded by C. Learn, to recommend waiver §365-11A.2.a. All in favor. Motion carried.

C. Learn made a motion, seconded by C. Kauffman to recommend the Trap Enterprises Event Center LDP 1438 to the Board of Commissioners for approval based on T&M's letter dated 5/12/2025. All in favor. Motion carried.

- 2054 Route 611 Minor Subdivision – LDP 1444 – Plans were administratively accepted at the 4/14/25 P.C. meeting. Approval deadline of July 13, 2025. ***Deadline for P.C. consideration is 6/9/25.***

C. Learn made a motion, seconded by K. VanFleet, to recommend the waiver §390.22 Boundary Survey Requirement. All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Learn, to recommend for approval the 2054 Route 611 Minor Subdivision LDP 1444 to the Board of Commissioners based off T&M's letter dated 4/11/25. All in favor. Motion carried.

- MCTA Transit Facilities Expansion – (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of Sept 5, 2025. ***Deadline for P.C. consideration is 8/11/25.***

K. VanFleet made a motion, seconded by C. Learn, to recommend the waiver §390-50.D.(5). All in favor. Motion carried.

J. Folsom made a motion, seconded by K. VanFleet, to recommend the waiver §390.50.D.(8). All in favor. Motion carried.

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

C. Kauffman made a motion, seconded by C. Learn, to recommend the waiver §390-55.E.(3). All in favor. Motion carried.

K. VanFleet made a motion, seconded by J. Folsom, to recommend the waiver §365-8.L. All in favor. Motion carried.

C. Learn made a motion, seconded by J. Folsom, to recommend the waiver §365-13.B. All in favor. Motion carried.

C. Kauffman made a motion, seconded by J. Folsom, to recommend the waiver §365-13.C. All in favor. Motion carried.

J. Folsom made a motion, seconded by K. VanFleet, to Table the plan. All in favor. Motion carried.

- Mountain Edge Village Community Townhouses – LDP 1445 – Plans were administratively accepted at the 4/14/25 P.C. meeting. Approval deadline of July 13, 2025. ***Deadline for P.C. consideration is 6/9/25.***

J. Folsom made a motion, seconded by C. Kauffman, to deny the plan should an extension not be received prior to the next Planning Meeting in June. All in favor. Motion carried.

J. Folsom made a motion, seconded by K. VanFleet, to deny the following plans should an extension not be received prior to the next P.C. Meeting. All in favor. Motion carried.

- Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of June 30, 2025 **Deadline for P.C. consideration is 06/9/25.**
- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9/24 P.C. meeting with approval deadline of July 7, 2025 **Deadline for P.C. consideration is 6/9/25.**

J. Folsom made a motion, seconded by C. Learn, to table the following plans. All in favor. Motion carried.

- 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.**

NEW BUSINESS

J. Sawicky made a motion, seconded by B. Kilby to recommend Ordinance 2025-19 for approval by the BOC. All in favor. Motion carried.

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 starting 6/23/25 with the BOC and PC.

PUBLIC COMMENT

Dean Weir (Resident) – Thanked the P.C. for their work on protecting the residential districts.

Maria Bras Danges (Resident) – Thanked the P.C. for listening to the residents' concerns.

ADJOURNMENT C. Kauffman made a motion, seconded by C. Learn, to adjourn the meeting at 7:10 p.m. All in favor. Motion carried.



YOUR GOALS. OUR MISSION.

April 16, 2025

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

**SUBJECT: TANNERSVILLE POINT APARTMENTS LAND DEVELOPMENT
SANITARY SEWER SYSTEM REVIEW NO. 3
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1358, T&M PROJECT NO. POCS-R0007**

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:

- Sanitary Sewer Comment Response letter from Keystone Consulting Engineers dated March 20, 2025;
- Sewage Planning Module Package Resubmission;
- Design Calculations for the Warner Road Sewage Pumping Station, March 2024.
- Penn DOT HOP Plans, (9 sheets) prepared by Keystone Consulting Engineers dated July 24, 2023, Revised 3/7/25.
- Preliminary/Final Warner Road Sanitary Sewer Pump Station (17 sheets) dated May 11, 2023,
- Warner Road Pump Station, individual plan labeled as sheet x of x, dated 5/11/23.

BACKGROUND INFORMATION

The Applicant, Tannersville Point, LLC is proposing a proposed 280-unit apartment complex including associated required improvements. The site is located along Warner Road, immediately Northeast of Interstate 80. The site is located in the central sewage service area. However, Township sewage facilities have not been extended to the parcel.

The development proposes to connect to central water supplied by BCRA and central sanitary sewer served by Pocono Township. The site is located in the Pump Station 5 service area. The proposed development will connect to the sewer system through the construction of new proposed Pump Station Number 6, which will be dedicated to Pocono Township. Based on our review of the documents provided, the development will require 281 EDUs, or 69,407 gpd, one for each apartment plus one for the club house. The tapping fee for this capacity will be \$1,053,750. The system does have capacity to serve this development.

Based on our review of the submitted information and our previous review letter dated October 1, 2024, we offer the following.



SEWAGE PLANNING COMMENTS

- 1.-2. Previous Comments satisfied.
3. A water supply letter must be included with the Package. *(Previous Comment 3)*
4. A letter from BCRA for WWTP Sewage Capacity must be provided. *(Previous Comment 4)*
5. A letter from Pocono Township must be provided certifying available capacity. This letter can only be provided after capacity is reserved for the required sewage flows. *(Previous Comment 5)*
6. The sewage planning letter checklist must be completed by the Applicant. Once the checklist is complete and the Board of Commissioners pass a Resolution approving the sewage planning, the checklist must be signed by the Township. *(Previous Comment 6)*
7. The completion checklist must be completed and signed by the Township once the package is in order. *(Previous Comment 7)*
8. The Transmittal Letter must be signed by the Township once the package is in order. *(Previous Comment 8)*
9. The Resolution for Plan Revision must be passed and signed by the Board of Commissioners. *(Previous Comment 9)*
- 10.-13. Previous Comments satisfied.
14. Component 3, Section G2.b., BCRA shall sign the section for WWTP capacity. *(Previous Comment 14)*
- 15.-17. Previous Comments satisfied.
18. Component 3, Sections J.3.b. & c. shall be signed by Pocono Township. *(Previous Comment 18)*
19. Component 3, Section J.4. shall be completed by BCRA. *(Previous Comment 19)*
20. Component 3, Section P.2. is checked “YES”; therefore, Public Notice is required by the Applicant and must be include in the package. The public notice must be added to the SPM Package once complete. *(Previous Comment 20)*
21. Previous Comment 21 satisfied.



22. Component 4A must be signed by the Township Planning Commission. *(Previous Comment) Note that the applicant must coordinate with the Planning Commission to be placed on the agenda as a SPM review to have the form signed. (Previous Comment 22)*
23. Previous Comment 23 satisfied

NOTE: Based on the remaining items above, once the Reservation of Capacity is received with the required capacity letters, it appears the sewage planning module is ready for approval by the Township and to be sent to the PADEP. The applicant shall provide three (3) copies of the sewage planning package to the Township for processing.

SEWER SYSTEM PROCEDURES MANUAL & RULES AND REGULATIONS COMMENTS

24. The project appears to have a swimming pool. Pools have backwash systems that discharge to sanitary systems. Section 3.1 of the Rules and Regulations, states “No Person shall discharge, or shall cause or allow to be discharged, into the Sewer System any storm sewer, surface water, artesian well water, spring water, ground water, roof runoff, subsurface drainage, building foundation drainage, cellar drainage, untreated swimming pool drainage, condensate, de-ionized water, noncontact cooling water or drainage from roof leader connections.” The total volume of pool backwash and the discharge rate must be identified and a treatment system of the backwash, such as a settling tank, must be provided. *(From Previous Comment 24) The response letter states pretreatment shall be through a 1,000 gallon settling tank. The details of the tank shall be added to the plans.*
25. Section 4.01 Connection Process – The Applicant shall provide a connection permit application, as appropriate for this project and consistent with the Township Rules and Regulations. *(Previous Comment) The response letter states that the application will be provided under separate cover. (Previous Comment 25)*
26. A Reservation of Capacity must be submitted for approval. *(Previous Comment) The response letter states that the reservation of capacity will be submitted under separate cover. It is noted that the Township will not be able to approve the Sewage Planning Module until after the reservation of capacity is complete. (Previous Comment 26)*
27. The required PennDOT HOP shall be provided prior to plan approval for the sewer main. *(Previous Comment 27)*
28. The required Part II Water Quality Permit for the pump station shall be provided prior to plan approval. *(Previous Comment 28)*

TECHNICAL COMMENTS

29. Previous Comment 29 satisfied.



30. Warner Road Sanitary Sewer Pump Station Plans:

- a. The pump station control, architectural, and electrical system designs shall be added to the plans. *(Previous Comment 30.c.) The response letter states that the above information will be provided under separate submission. The plans do now include limited architectural and electrical information. This information has not been reviewed as it appears the applicant's engineer desires to add more information.*
- b. Grading spot elevations and existing topography shall be added to the plans for review. *(Previous Comment 30.f.) The spot elevation at the building door is at 886.4, with the first-floor elevation of the building at 887.00. The entrance to the building should match finished grade with no step into the building.*
- c. The proposed fence shall be revised to be an 8' high security fence. *(Previous Comment 30.i.) The site plan now indicates an 8' high fence. However, the construction details call for a 10'-6" fence. The correct fence height shall be specified and the reference to the City of Bethlehem shall be removed.*
- d. The pump station shall be provided with a 4" bypass connections by the means of a normally closed plug valve, check valve, and male cam lock connection with cap. *(Previous Comment 30.n.) The bypass connection is now shown in a pit which could be flooded during emergency operations. Should this connection type be desired, a valve stem through the lid with the cam lock elevated to through the lid to above the valve vault shall be provided.*

31. Land Development Plans:

- a. Sewer Lateral Inspection Tees shall be provided at all lateral locations crossing sanitary sewer easement lines. *(Previous Comment 31.m.) The Test Tees have mostly been provided. A tee is required for the club house. Additionally, the test tee on the main between MH PS 6-4 and PS 6-10 is not required and shall be removed.*
- b. The sewer lateral detail shall be revised to indicate a 6" sewer lateral for the buildings. *(Previous Comment 31.w.) The lateral to the club house must be a 6" lateral.*

32. Engineer's Design Report

- a. For clarity purposes for the required water quality permit submission to the PADEP, notation shall be added to the calculation sheets and plans where the future pump is shown to state that the future pump is not included in this permit and shall be permitted only under a separate water quality permit. **(New Comment)**
- b. The pump operational points shall be plotted on a pump curve. **(New Comment)**

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

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.



If you should have any questions regarding the above comments, feel free to contact our office.

Sincerely,

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

MEG/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Tannersville Point, LLC – Applicant
Alan Fornwalt, P.E. – Keystone Consulting Engineers, Inc.
David Horton, P.E. – BCRA
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates

1. <http://www.fishbase.org>



YOUR GOALS. OUR MISSION.

June 5, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: CAMP LINDENMERE SPORTS ARTS CENTER, LLC – DINING HALL EXPANSION
REVISED FINAL LAND DEVELOPMENT – PLAN COMPLETENESS REVIEW
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1372A, T&M PROJECT NO. POCO-R0621**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a completeness review of the Revised Final Land Development Plan for the Dining Hall Expansion at Camp Lindenmere Sports Arts Center, LLC. The submitted information consists of the following items.

- Pocono Township Land Development Application with Professional Services Escrow Agreement.
- Act 537 Planning Approval Letter from the Pennsylvania Department of Environmental Protection dated June 27, 2023.
- Pennsylvania Department of Environmental Protection Resolution for Plan Revision for New Land Development dated July 18, 2022.
- Pennsylvania Department of Environmental Protection Public Water System Modification Approval (PWSID No. 245091) dated May 12, 2022.
- Pennsylvania Department of Environmental Protection Public Water System Modification Approval (PWSID No. 2451220) dated June 7, 2021.
- Emailed correspondence from the Pennsylvania Department of Environmental Protection providing approval to operate a noncommunity water system, dated June 8, 2021.
- Pocono Township Resolution No. 2024-04.
- Pennsylvania Department of Environmental Protection Individual NPDES Permit No. PAD450127, issued July 8, 2021.
- Wetlands Presence/Absence Assessment prepared by Barry Isett & Associates, Inc., dated November 13, 2019.
- Supplemental Stormwater Management Report prepared by Keystone Consulting Engineers, Inc., dated May 9, 2025.
- Revised Final Land Development Plan (16 sheets) prepared by Keystone Consulting Engineers, Inc., dated May 9, 2025.



BACKGROUND INFORMATION

The Applicant, Lindenmere Sports Arts Center, LLC, is proposing to expand its existing facilities at Camp Lindenmere. Camp Lindenmere is located in the C, Commercial Zoning District and is split between the northern and southern sides of State Route 715, approximately one (1) mile east of its intersection with State Route 0611. The existing property has an area of approximately 159 acres and consists of an existing overnight camp with sleeping, activity, and food facilities. The remainder of the site is woodland areas.

Campgrounds are not permitted within the C, Commercial Zoning District, therefore Camp Lindenmere is an existing non-conforming use. In accordance with Section 470-32.C.(1) of the Zoning Ordinance, any nonconforming use “shall not be enlarged, altered, extended, reestablished, restored, or placed on a different portion of the lot or parcel of land occupied by such use on the effective date of this chapter, without a special exception from the Zoning Hearing Board”.

A previously approved Land Development Plan proposed to expand existing camp facilities located on the southern side of State Route 0715. The expansion included the construction of ten (10) bunk houses, one (1) staff cabin, a health center, music hall, and a two (2) story assembly hall. Additions to the existing theatre/recreation center and dining hall, and new parking areas were also proposed.

A Special Exception was also granted by the Pocono Township Zoning Hearing Board at its hearing on June 3, 2020, for the proposed expansion of the existing camp facilities shown on the previously approved Land Development Plan. It is noted that the newly submitted plan is a revision to the previously approved Land Development Plan.

The proposed development includes the expansion of the existing dining hall with a 7,150 square foot addition. The parking located north of the dining hall will be reconfigured.

Based upon our review, we recommend the Planning Commission accept the Preliminary/Final Major Subdivision and Land Development Plan for review, provided all other requirements have been met including, but not limited to, formal written applications and application fees with establishment of an escrow to cover the costs of review.

If you should have any questions, please call me.

Sincerely,

Jon S. Fresslar, 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
Matthew D. Evans, Keystone Consulting Engineers, LLC – Applicant’s Engineer
Kyle Garfinkel, Lindenmere Sports Arts Center, LLC – Owner/Applicant
Kristina Heaney, Manager – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates

APPENDIX G

REQUEST FOR MODIFICATION

Name of Applicant: Monroe County Transit Authority

Name of Subdivision or Land Development: MCTA Transit Facility Expansion

Section of Subdivision and Land Development Ordinance: 390-29.J(6)

Justification for Relief: Since the lot consolidation was recently completed for this project, and the information in the approved and recorded lot consolidation plan are being used, we do not see a benefit in a new title report.

Is the Hardship self-imposed: ☒ Yes ☐ No

Is the hardship related to financial issues: ☒ Yes ☐ No

Will relief from the reference section of the Subdivision and Land Development Ordinance alter the intent of the Ordinance? ☐ Yes ☒ No

Explain: The Ordinance states, "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." A copy of the latest deed of record has been provided. The boundary and easement information is based on a lot consolidation plan approved and recorded in 2024.



YOUR GOALS. OUR MISSION.

May 8, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: MCTA TRANSIT FACILITY EXPANSION – 134 MCTA DRIVE
PRELIMINARY/FINAL LAND DEVELOPMENT REVIEW NO. 2
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1421, T&M PROJECT NO. POCO-R0990**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a review of the Preliminary/Final Land Development Plan Application for MCTA Transit Facility Expansion. The submitted information consists of the following items.

- Response letter prepared by Stantec dated April 14, 2025.
- Monroe County Planning Commission review letter dated February 4, 2025.
- Community/Financial Impact Analysis prepared by Stantec dated April 14, 2025.
- Landscape Narrative prepared by Stantec dated March 31, 2025.
- PennDOT email regarding need for HOP dated March 19, 2025.
- Monroe County Transit Authority Site Lighting Plan set prepared by Stantec, 3 sheets, undated.
- Monroe County Transportation Authority Facility Fuel Tank Screen Wall and Salt Storage Wall report prepared by Stantec, dated March 31, 2025.
- Building Elevation Plan Set prepared by Stantec, 3 sheets, dated March 21, 2025.
- Deed of Consolidation dated June 11, 2024 for parcels 12.111383, 12.111.22, and 12.111926.
- Closure Report.
- Requests for Modifications.
- Geotechnical Report prepared by Susquehanna Civil dated June 2024.
- Phase I Environmental Assessment prepared by Niclaus Engineering Corporation, dated April 17, 2009.
- Wetlands & Watercourses Identification & Delineation Report prepared by McCormick Taylor, dated March 2023.
- ESPC Supporting Calculations prepared by Newell Tereska & Mackay, undated.
- Erosion & Sediment Pollution Control Plans prepared by Newell Tereska & Mackay, 19 sheets, dated November 25, 2024, last revised March 31, 2025.
- Post Construction Stormwater Management Report prepared by Newell Tereska & Mackay, dated April, 2025.
- Post Construction Stormwater Management Plans prepared by Newell Tereska & Mackay, 11 sheets, dated November 25, 2024, last revised March 31, 2025.
- Monroe County Transit Authority Transit Facility Preliminary/Final Land Development Plan set prepared by Stantec, 25 sheets, dated November 25, 2024, last revised March 31, 2025.



BACKGROUND INFORMATION

The Applicant, Monroe County Transportation Authority, has submitted a plan proposing development to their existing site at 134 MCTA Drive in Scotrun. The property is located within the C, Commercial, Zoning District and consists of a single parcel (Tax ID No. 12/11/1/22). The property has an area of 36.148 acres and contains an existing maintenance building, parking areas, fueling area, stormwater management facilities, wooded areas with steep slopes, an unnamed tributary to the Scot Run watercourse, and wetlands. The site is currently served by public water and sewer.

The project proposes a new 43,900 square foot building addition, new parking areas, fueling area, salt and parts storage areas, and additional stormwater management facilities.

In accordance with Section 470-20 of the Zoning Ordinance, vehicle service and repair facilities, vehicle fueling stations, and governmental uses are permitted within the C, Commercial Zoning District.

The project site is located within the A Stormwater Management District of the Brodhead-McMichaels Watershed. The receiving water is the Scot Run, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).

Based upon our review of the above information and our previous review letter dated January 21, 2025, we offer the following comments and/or recommendations related to the proposed development.

ZONING ORDINANCE COMMENTS

1. Per Section 470-34.D.(1) and (2) , “Required loading spaces. Every building or structure, lot or land hereafter put to a commercial or industrial use or an existing building or structure enlarged shall provide one off-street truck loading and unloading space for the first 5,000 square feet or less of gross floor area, plus a minimum of one additional off-street truck loading area for each additional 10,000 square feet of gross floor area.” and “An off-street truck loading space shall be a minimum of 12 feet in width and a minimum of 35 feet in length.” *No loading spaces are shown on the plans. The applicant shall address truck loading requirements for the site. (Previous Comment 1) The calculation has been added to the plan, but shall include all new building area, not just the bus storage. While the number of provided loading spaces appears to be correct, the calculation shall be revised accordingly.*
2. 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 therefor 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 thereof 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. (Previous Comment 2.a.) The response letter acknowledges this requirement.*



- 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. (Previous Comment 2.b) The response letter acknowledges this requirement.*

3. Previous Comment 3 satisfied.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Waivers in Comments 38, 44, 46, 47, 67, and 68 have been requested.

- 4.-6. Previous Comments satisfied.

7. In accordance with Section 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. All easements and other encumbrances of property which are or have been filed of record with the Recorder of Deeds of Monroe County shall be shown on the plan. Topography shall be coordinated with official USGS benchmarks and the location and datum shall be shown on the plan. This may be combined with the site context map. (Previous Comment 7) Per Subsection (5), soils and their accompanying data must also be added to the plan.*

- 8.-12. Previous Comments satisfied.

13. Per Section 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 deed book and page information shall be provided on the plan. (Previous Comment 13) The Cover Sheet has been revised to identify two (2) parcel IDs. The 2024 Deed of Consolidation created a single lot. The parcel ID and the Deed Book and Page number must be revised to reflect the consolidation.*

- 14.-25. Previous Comments satisfied.



26. In accordance with Section 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. (Previous Comment 26) A current title search report must still be provided.*
27. In accordance with Section 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. (Previous Comment 27) The response letter acknowledges this requirement.*
28. In accordance with Section 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 PADEP Act 537 Approval to the Township. The Sewage Facilities Planning Module has been reviewed under separate cover. (Previous Comment 28) The response letter acknowledges this requirement.*
29. In accordance with Section 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 from both BCRA for treatment and the Township for conveyance. (Previous Comment 29) The response letter acknowledges this requirement.*
30. In accordance with Section 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 – Comment letter dated February 4, 2025 received*
 - 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*
 - f. *Pocono Township Fire Department*

(Previous Comment 30) The response letter acknowledges these requirements.
31. In accordance with Section 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. (Previous Comment 31) The response letter acknowledges this requirement.*



32. In accordance with Section 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 plans depict utility poles along the rear property line adjacent to the properties fronting on Scotrun Drive. Additional information regarding any easement or restrictions with respect to this utility shall be provided. (Previous Comment 32) While the plans now reflect a recorded easement for PP&L, the recorded agreement or other information identifying any restrictions must still be provided to the Township.*
- 33.-35. Previous Comments satisfied.
36. 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 Recorder 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 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. (Previous Comment 36) The response letter acknowledges this requirement.*
37. 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. (Previous Comment 37) The response letter acknowledges this requirement.*
38. 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. (Previous Comment 38) The design engineer has requested a waiver to this requirement. The*



justification states, "Monroe County Transit Authority will provide long term maintenance." The Board of Commissioners must make this determination.

39. Previous Comment 39 satisfied.
40. 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. (Previous Comment 40) The tree protection fence has now been shown on the plans, but its installation must be addressed in the Staging of Earthmoving Activities on Sheet C-148.2.*
- 41.-42. Previous Comments satisfied.
43. 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. (Previous Comment 43) The clear sight triangles shall be located at the intersection of the MCTA driveway at MCTA Drive and at the intersection of MCTA Drive and Route 0611.*
44. 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." *Sidewalk shall be provided along the entire frontage of the development site unless a waiver/deferral is granted by the Board of Commissioners. (Previous Comment 44) The design engineer has requested a deferral to this requirement. The justification states, "A deferral of the requirement is being requested. MCTA will install sidewalks along RT611 when sidewalk are installed on the adjacent properties." The Board of Commissioners must make this determination.*
45. Previous Comment 45 satisfied.
46. Per Section 390-50.D.(5), "Embankment slope. The maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical." *The plan proposes the embankments to be graded at 3 to 1 and shall be revised to meet the ordinance requirement accordingly. (Previous Comment 46) The design engineer has requested a waiver to this requirement. The justification states, "Due to the slope of the site, 3:1 basin slope are being requested to minimize the required disturbance to the existing vegetation while providing a stable and maintainable slopes." We have no objection to this waiver request.*



47. Per 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." *The basin appears to be flat across the basin bottom due to its design as an MRC basin. If requested, we would support a waiver to this requirement since a flat bottom is required for infiltration. (Previous Comment 47) The design engineer has requested a waiver to this requirement. The justification states, "The MRC basin has a 6" diameter underdrain network via infiltration. A flat bottom ensures that the MRC basin is properly infiltrating and collecting said infiltration evenly." We have no objection to this waiver request.*
48. Previous Comment 48 satisfied.
49. In accordance with Section 390-50.D.(11)(g), "The upstream edge of the emergency spillway shall be a minimum of three feet below the spillway crest elevation." *The plans shall show the extent of the spillway material to demonstrate compliance with this requirement. (Previous Comment 49) The MRC Basin Permanent Emergency Spillway on Sheets C-806.2 and C-147.3 must be revised to show conformance with the requirement for the spillway material to extend three feet below the spillway crest elevation.*
- 50.-54. Previous Comments satisfied.
55. Per Section 390-50.D.(17), "A cutoff trench (keyway) of impervious material shall be provided under all embankments that require fill material. The cutoff trench shall be a minimum of eight feet wide, two feet deep and have side slopes of one-to-one." *A keyway meeting the requirements of this section shall be provided. The Clay Core currently shown on the plans is not adequate in size. Also, the keyway is required for entire length of the basin berm that is in a fill condition. (Previous Comment 55) The height dimension for the Clay Core must be added to the detail on Sheet C-806.1.*
56. 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. (Previous Comment 56) The response letter acknowledges this requirement.*
57. 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. (Previous Comment 57) The response letter acknowledges this requirement.*
58. 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 provided. (Previous Comment 58) The response letter acknowledges this requirement.

59. 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. (Previous Comment 59) The response letter acknowledges this requirement.*
60. 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. (Previous Comment 60) The response letter acknowledges this requirement.*
61. 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. (Previous Comment 61) The response letter acknowledges this requirement.*
62. 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. (Previous Comment 62) The tree protection fencing has been added to the E&S plans, but it is also required to be shown on the landscape plans.*
63. 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. (Previous Comment 63) The clear sight triangles shall be located at the intersection of the MCTA driveway at MCTA Drive and at the intersection of MCTA Drive and Route 0611.*
- 64.-66. Previous Comments satisfied.
67. Per Section 390-55.D.(1)(a), "Street trees required. Street trees shall be required Along all existing streets abutting or within the proposed subdivision or land development." *Street trees are required along SR0611. (Previous Comment 67) The design engineer has requested a waiver to this requirement. The justification states, "There are existing trees along SR0611 and existing overhead wires that would restrict the placement of additional street trees."*



68. Per Section 390-55.E.(3), "Basin grades. Minimum grades inside stormwater basins shall be 1% unless infiltration is an integral part of the design; and maximum side slopes of the basin shall be 33% (3:1 slope)." *The basin bottoms are proposed to be flat for managed release (MRC) purposes. Therefore, we would not be opposed to a waiver to this requirement if the applicant were to request it. (Previous Comment 68) The design engineer has requested a waiver to this requirement. The justification states, "The MRC basin has a 6" diameter underdrain network via infiltration. A flat bottom ensures that the MRC basin is properly infiltrating and collecting said infiltration evenly." We have no objection to this waiver request.*
69. Previous Comment 69 satisfied.
70. In accordance with Sections 390-55.F.(3)(g) and (h), "Existing healthy trees, shrubs, or woodlands may be substituted for part or all of the required plants with the approval of the Township. The minimum quantities and/or visual effect of the existing vegetation shall be equal to or exceed that of the required buffer as determined by the Township." and "Existing topographic conditions, such as embankments or berms, in conjunction with existing vegetation, may be substituted for part or all of the required property line buffers with the approval of the Township. The minimum visual effect shall be equal to or exceed that of the required buffer." *If the Applicant is requesting either of these substitutions, a demonstration of the equivalency shall be provided. (Previous Comment 70) The response letter states, "Existing, deciduous trees are located between the rear fenceline (east property line) and the 50' wide utility easement. Stantec is proposing to take credit for the existing deciduous tree as equivalent to the required deciduous Canopy Trees and Ornamental Trees for a portion of this limit (see landscape plan). Evergreen trees are proposed as required (5/100 LF) along this same area, in some of the open areas, and will create a more effective screen in combination with the existing deciduous trees." We take no issue with this request based on the unique existing site conditions.*
71. Previous Comment 71 satisfied.
72. 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. (Previous Comment 72) The response letter acknowledges this requirement.*
- 73.-74. Previous Comments satisfied.
75. 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. (Previous Comment 75) The response letter acknowledges this requirement.*
76. 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 proposed 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 plans do not contain any information on the proposed lighting. Lighting plans conforming to the ordinance requirements shall be submitted. (Previous Comment 76) Lighting plans have been provided with the current submission. The plans must be revised to show the layout and location of all proposed fixtures included in the tabulation. Additionally, several proposed fixtures that are shown on the plan must be labeled.

77. In accordance with Section 390-56.A.(5), design standards shall apply to all lighting fixtures. *Lighting plans shall comply with this section and include any notes required with respect to IESNA cutoff requirements. (Previous Comment 77) Lighting plans have been provided with the current submission. The following are noted:*
- a. *Per Section 390-56.A.(5)(a), “All lighting fixtures for off-street parking areas, off-street loading areas, driveways and for safety of persons and property must meet IESNA full cutoff.” The plans must specify the required full cutoff.*
 - b. *Per Section 390-56.A.(5)(c), “The maximum height of light fixtures, including the mounting base, is as follows: [1] Full-cutoff fixtures with 44,000 lumen lamps maximum. In parking lots: 20 feet AFG (above finished grade).” The mounting height of the new pole lighting is 30-feet plus a 3-foot base for a total of 33-feet. These must be revised to meet the ordinance requirements.*
78. Per Section 390-56.A.(6), lighting shall meet the specified performance standards. *Lighting plans conforming to the ordinance performance standards shall be submitted. (Previous Comment 78) Lighting plans have been provided with the current submission. The following are noted:*
- a. *Per Section 390-56.A.(6)(a), “All lighting shall be effectively shielded and shall be installed and/or aimed so as to shield nearby public or private property from direct glare that may create a safety hazard.” The required shielding shall be indicated.*
 - b. *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 luminaire schedule indicates numerous wall-mounted fixtures; however, the plan does not indicate where these are to be located. The fixture locations shall be shown on the plan and shall not be permitted to illuminate parking areas.*
79. Previous Comment 79 satisfied.
80. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:
- A. Section 390-58.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 \$14,994.00 (10.71 disturbed acres * \$1,400.00). (Previous Comment 80) The response letter indicates the Applicant will discuss this requirement with the Township.*

81.-82. Previous Comments satisfied.

STORMWATER MANAGEMENT ORDINANCE COMMENTS

Waivers in Comments 84, 88, and 89 have been requested.

83. Previous Comment 83 satisfied.

84. In accordance with Section 365-8.L., "Roof drains should not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment." *The plans show the roof drains for the existing and proposed buildings connecting directly into the storm sewer. If requested, we would support a waiver to this requirement, since the roof water is "clean" and to allow the water to cross the parking area would add pollutants and increase temperature. (Previous Comment 84) The design engineer has requested a waiver to this requirement. The justification states, "Since the roof water is "clean", and to allow the water to cross the parking area would add pollutants and increase temperature, a direct connection to the storm sewer could reduce pollutants to the MRC bed and thermal impacts to the receiving stream." We have no objection to this waiver request.*

85.-87. Previous Comments satisfied.

88. In accordance with Section 365-13.B, "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 A^{III} of this chapter. If a hydrologic computer model such as PSRM or HEC-1 is used for stormwater runoff calculations, then the duration of rainfall shall be 24 hours. The NRCS "S" curve shown in Figure B-1, Appendix A of this chapter, shall be used for the rainfall distribution." *The Stormwater Management Report utilizes rainfall values from NOAA Atlas 14, Volume 2, Version 3, location Swiftwater, PA". We have no objection to the Applicant requesting a waiver from this Section to utilize the rainfall data from NOAA. (Previous Comment 88) The design engineer has requested a waiver to this requirement. The justification states, "The stormwater management report utilizes rainfall values*



from NOAA Atlas 14, Volume 2, Version 3, location Swiftwater, PA per PADEP design standards." We have no objection to this waiver request.

89. In accordance with Section 365-13.C, "For the purposes of existing conditions flow rate determination, undeveloped land shall be considered as "meadow" in good condition, unless the natural ground cover generates a lower curve number or Rational "C" value, as listed in Table B-2 or B-3 in Appendix A of this chapter." *Table 5 on page 13 of the stormwater report indicates that 20% of the existing impervious surface within the LOD was considered as "meadow" in the calculations. The ordinance requires all of the impervious to be considered as "meadow". Therefore, the calculations shall be revised accordingly. (Previous Comment 89) The design engineer has requested a waiver to this requirement. The justification states, "Areas tributary to the existing stormwater management basin, to remain, are being modeled as existing ground cover. The intent of the design is to maintain the tributary areas to the existing basin. Other areas are to be modeled as per the Ordinance requirement." We have no objection to this waiver request.*
- 90.-91. Previous Comments satisfied.
92. In accordance with Section 365-15.A, "Any earth disturbance must be conducted in conformance with Pennsylvania Title 25, Chapter 102, Erosion and Sediment Control." *The proposed disturbance is greater than one acre, therefore, a NPDES Permit from the Monroe County Conservation District is required. All correspondence with, submissions to, and NPDES Permit from the County Conservation District, shall be provided to the Township. (Previous Comment 92) The response letter acknowledges this requirement.*
93. In accordance with Sections 365-17 and 365-19.A.(4), for any of the activities regulated by this chapter, the preliminary or final approval of subdivision and/or land development plans, the issuance of any building or occupancy permit, or the commencement of any earth disturbance may not proceed until the applicant or his/her agent has received written approval of a stormwater management site plan from the municipality, an adequate erosion and sediment control plan review by the Conservation District and an NPDES permit from the DEP, if required. *The proposed disturbed area is greater than one (1) acre, therefore an NPDES Permit is required. The Applicant shall provide a copy of the NPDES Permit and the Letter of Determination of Adequacy from the Monroe County Conservation District, as well as any correspondence pertaining to the review. (Previous Comment 93) The response letter acknowledges this requirement.*
- 94.-97. Previous Comments satisfied.
98. In accordance with Section 365-19.B.(19), the stormwater site plan shall contain "A fifteen-foot-wide access easement to and around all stormwater management facilities that would provide ingress to and egress from a public right-of-way." *This easement shall be provided on the plan. In the alternative, the plan may note a blanket easement for access. (Previous Comment 98) The easement or blanket easement must still be addressed on the plans.*
- 99.-101. Previous Comments satisfied.
102. In accordance with Section 365-27.A., "For subdivisions and land developments, the applicant shall provide a performance guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved stormwater management site plan in the amount and method of payment provided for in Chapter 390, Subdivision and Land



Development.” *A construction cost estimate for the stormwater management facilities shall be provided to the Township to determine the amount to be required for the performance guarantee. The performance guarantee shall be provided to the Township as part of the Final Plan submission. (Previous Comment 102) The response letter states, “MCTA will discuss this requirement with the Township.”*

103. Previous Comment 103 satisfied.

104. In accordance with Section 365-29., “Prior to approval of the site's stormwater management site plan, the applicant shall sign and record a maintenance agreement in form and substance satisfactory to the Board of Commissioners, covering all stormwater control facilities that are to be privately owned.” *This shall be completed at the time of Final Plan approval and as required by this Section. (Previous Comment 104) The response letter acknowledges this requirement.*

STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS

105.-112. Previous Comments satisfied.

113. The rip-rap table on page A-13 does not match the table on the E&S plan. The discrepancies shall be corrected. *(Previous Comment 113) The rip-rap summary table on page A-33 of the report still does not match the tables on Sheets C-147.4 and C-806.5. The discrepancies shall be corrected.*

114.-115. Previous Comments satisfied.

116. Appendix C is labeled as “100-year Emergency Spillway HydroCAD Model Run”. The actual spillway design calculations must also be included within this section. *(Previous Comment 116) The Emergency Spillways shall be designed for the 100-year inflow to the basin, e.g., 59.89 cfs for the MRC basin and 60.95 cfs for the forebay. The design calculations are based on only 1.5 cfs on page C-143 of the report. The calculations shall be revised accordingly.*

117.-121. Previous Comments satisfied.

MISCELLANEOUS COMMENTS

122.-130. Previous Comments satisfied.

131. The existing lot area in the Zoning Data table on Sheets C-101, C-121, and C-122 shall be revised to match the “MCTA Lot Line Adjustment Plan”. *(Previous Comment 131) The areas on the recorded plan are 36.148 Acres Gross and 34.950 Acres Net. The land development plan shall match the recorded plan.*

132.-139. Previous Comments satisfied.

140. The FloGard Detail on Sheet C-502 indicates installation only on Inlet ST12. Utility Plan Sheet C-151 shows the FloGard on Inlets ST11 and ST12. The detail on Sheet C-808 indicates installation on Inlets ST5, ST6, ST7, ST8, ST9, ST10, ST11, and ST12. These discrepancies shall be resolved. *(Previous Comment 140) The response letter states, “FloGard inserts will be installed in inlets ST4, ST4A, ST5, ST6, ST7, ST8, ST9, ST10, ST11, and ST12. The detail on sheet C-806.3 has been revised*



reference the PCSM plan for FloGuard locations.” Sheet C-503 indicates the FloGard Filter is to be used only in Inlets ST11 and ST12. This discrepancy shall be eliminated.

141.-146. Previous Comments satisfied.

147. The PCSM Underdrain Detail on Sheet C-806 should clarify any geotextile to be used around the aggregate envelope as recommended in DEP’s MRC guidance document. *(Previous Comment 147) A detail has been added to Sheet C-806.1; however, there are no dimensions on the aggregate envelope. The dimensions must be added to the detail.*

148.-150. Previous Comments satisfied.

151. There is a leader line note on the Permanent Emergency Spillway that states “RECP-5A TRM Spillway Protection”. A detail for this protection shall be added to the plans and the spillway lining shown in plan view throughout the plan set. Additionally, the spillway for the forebay appears to be rock, not geotextile, based on the plan view depiction. This shall also be clarified. *(Previous Comment 151) A detail for the RECP-5A TRM Spillway Protection lining must still be added to the plans.*

152. Dimensions shall be added to the anti-seep collar detail on Sheet C-808. *(Previous Comment 152) Additional information has been added to the anti-seep collar detail on Sheet 806.1. The detail now indicates the collar is to be “1/4” High Density Polyethylene”; however, the calculations on page A-39 of the report state that the collars are to be concrete. This discrepancy shall be corrected.*

153. Previous Comment 153 satisfied.

154. *The adjacent Zoning District shall be labeled on Sheet C-101. (New Comment)*

155. *A Chain Link Fence Pedestrian Gate detail is show on Sheet C-502. The gate is labeled with a 4’ nominal opening, but the plans show 10’wide double personnel gates. The detail shall be revised to match the plan. (New Comment)*

156. *The Clay Core Detail on Sheet C-806.1 contains a note referencing Sheet C-104. Since there is no sheet with that number in the plan set, the reference shall be corrected. (New Comment)*

157. *The pipe lengths and inverts in and out for the profile “A-A” on Sheet C-806.2 must be labeled. (New Comment)*

158. *A guiderail detail shall be added to the plan set. (New Comment)*

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development and Subdivision Plan.



In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions, please call me.

Sincerely,

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

JST/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Richard Schlameuss – CEO, MCTA (rschlameuss@gomcta.com)
John F. Grant, P.E. – Stantec (john.grant@stantec.com)
Kristina Heaney – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates



YOUR GOALS. OUR MISSION.

May 8, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: MCTA TRANSIT FACILITY EXPANSION – 134 MCTA DRIVE
PRELIMINARY/FINAL LAND DEVELOPMENT REVIEW NO. 2
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1421, T&M PROJECT NO. POCO-R0990**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a review of the Preliminary/Final Land Development Plan Application for MCTA Transit Facility Expansion. The submitted information consists of the following items.

- Response letter prepared by Stantec dated April 14, 2025.
- Monroe County Planning Commission review letter dated February 4, 2025.
- Community/Financial Impact Analysis prepared by Stantec dated April 14, 2025.
- Landscape Narrative prepared by Stantec dated March 31, 2025.
- PennDOT email regarding need for HOP dated March 19, 2025.
- Monroe County Transit Authority Site Lighting Plan set prepared by Stantec, 3 sheets, undated.
- Monroe County Transportation Authority Facility Fuel Tank Screen Wall and Salt Storage Wall report prepared by Stantec, dated March 31, 2025.
- Building Elevation Plan Set prepared by Stantec, 3 sheets, dated March 21, 2025.
- Deed of Consolidation dated June 11, 2024 for parcels 12.111383, 12.111.22, and 12.111926.
- Closure Report.
- Requests for Modifications.
- Geotechnical Report prepared by Susquehanna Civil dated June 2024.
- Phase I Environmental Assessment prepared by Niclaus Engineering Corporation, dated April 17, 2009.
- Wetlands & Watercourses Identification & Delineation Report prepared by McCormick Taylor, dated March 2023.
- ESPC Supporting Calculations prepared by Newell Tereska & Mackay, undated.
- Erosion & Sediment Pollution Control Plans prepared by Newell Tereska & Mackay, 19 sheets, dated November 25, 2024, last revised March 31, 2025.
- Post Construction Stormwater Management Report prepared by Newell Tereska & Mackay, dated April, 2025.
- Post Construction Stormwater Management Plans prepared by Newell Tereska & Mackay, 11 sheets, dated November 25, 2024, last revised March 31, 2025.
- Monroe County Transit Authority Transit Facility Preliminary/Final Land Development Plan set prepared by Stantec, 25 sheets, dated November 25, 2024, last revised March 31, 2025.



BACKGROUND INFORMATION

The Applicant, Monroe County Transportation Authority, has submitted a plan proposing development to their existing site at 134 MCTA Drive in Scotrun. The property is located within the C, Commercial, Zoning District and consists of a single parcel (Tax ID No. 12/11/1/22). The property has an area of 36.148 acres and contains an existing maintenance building, parking areas, fueling area, stormwater management facilities, wooded areas with steep slopes, an unnamed tributary to the Scot Run watercourse, and wetlands. The site is currently served by public water and sewer.

The project proposes a new 43,900 square foot building addition, new parking areas, fueling area, salt and parts storage areas, and additional stormwater management facilities.

In accordance with Section 470-20 of the Zoning Ordinance, vehicle service and repair facilities, vehicle fueling stations, and governmental uses are permitted within the C, Commercial Zoning District.

The project site is located within the A Stormwater Management District of the Brodhead-McMichaels Watershed. The receiving water is the Scot Run, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).

Based upon our review of the above information and our previous review letter dated January 21, 2025, we offer the following comments and/or recommendations related to the proposed development.

ZONING ORDINANCE COMMENTS

1. Per Section 470-34.D.(1) and (2) , “Required loading spaces. Every building or structure, lot or land hereafter put to a commercial or industrial use or an existing building or structure enlarged shall provide one off-street truck loading and unloading space for the first 5,000 square feet or less of gross floor area, plus a minimum of one additional off-street truck loading area for each additional 10,000 square feet of gross floor area.” and “An off-street truck loading space shall be a minimum of 12 feet in width and a minimum of 35 feet in length.” *No loading spaces are shown on the plans. The applicant shall address truck loading requirements for the site. (Previous Comment 1) The calculation has been added to the plan, but shall include all new building area, not just the bus storage. While the number of provided loading spaces appears to be correct, the calculation shall be revised accordingly.*
2. 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 therefor 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 thereof 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. (Previous Comment 2.a.) The response letter acknowledges this requirement.*



- 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. (Previous Comment 2.b) The response letter acknowledges this requirement.*

3. Previous Comment 3 satisfied.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Waivers in Comments 38, 44, 46, 47, 67, and 68 have been requested.

4.-6. Previous Comments satisfied.

7. In accordance with Section 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. All easements and other encumbrances of property which are or have been filed of record with the Recorder of Deeds of Monroe County shall be shown on the plan. Topography shall be coordinated with official USGS benchmarks and the location and datum shall be shown on the plan. This may be combined with the site context map. (Previous Comment 7) Per Subsection (5), soils and their accompanying data must also be added to the plan.*

8.-12. Previous Comments satisfied.

13. Per Section 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 deed book and page information shall be provided on the plan. (Previous Comment 13) The Cover Sheet has been revised to identify two (2) parcel IDs. The 2024 Deed of Consolidation created a single lot. The parcel ID and the Deed Book and Page number must be revised to reflect the consolidation.*

14.-25. Previous Comments satisfied.



26. In accordance with Section 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. (Previous Comment 26) A current title search report must still be provided.*
27. In accordance with Section 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. (Previous Comment 27) The response letter acknowledges this requirement.*
28. In accordance with Section 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 PADEP Act 537 Approval to the Township. The Sewage Facilities Planning Module has been reviewed under separate cover. (Previous Comment 28) The response letter acknowledges this requirement.*
29. In accordance with Section 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 from both BCRA for treatment and the Township for conveyance. (Previous Comment 29) The response letter acknowledges this requirement.*
30. In accordance with Section 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 – Comment letter dated February 4, 2025 received*
 - 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*
 - f. *Pocono Township Fire Department*

(Previous Comment 30) The response letter acknowledges these requirements.

31. In accordance with Section 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. (Previous Comment 31) The response letter acknowledges this requirement.*



32. In accordance with Section 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 plans depict utility poles along the rear property line adjacent to the properties fronting on Scotrun Drive. Additional information regarding any easement or restrictions with respect to this utility shall be provided. (Previous Comment 32) While the plans now reflect a recorded easement for PP&L, the recorded agreement or other information identifying any restrictions must still be provided to the Township.*

33.-35. Previous Comments satisfied.

36. 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 Recorder 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 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. (Previous Comment 36) The response letter acknowledges this requirement.

37. 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. (Previous Comment 37) The response letter acknowledges this requirement.*

38. 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. (Previous Comment 38) The design engineer has requested a waiver to this requirement. The*



justification states, "Monroe County Transit Authority will provide long term maintenance." The Board of Commissioners must make this determination.

39. Previous Comment 39 satisfied.
40. 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. (Previous Comment 40) The tree protection fence has now been shown on the plans, but its installation must be addressed in the Staging of Earthmoving Activities on Sheet C-148.2.*
- 41.-42. Previous Comments satisfied.
43. 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. (Previous Comment 43) The clear sight triangles shall be located at the intersection of the MCTA driveway at MCTA Drive and at the intersection of MCTA Drive and Route 0611.*
44. 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." *Sidewalk shall be provided along the entire frontage of the development site unless a waiver/deferral is granted by the Board of Commissioners. (Previous Comment 44) The design engineer has requested a deferral to this requirement. The justification states, "A deferral of the requirement is being requested. MCTA will install sidewalks along RT611 when sidewalk are installed on the adjacent properties." The Board of Commissioners must make this determination.*
45. Previous Comment 45 satisfied.
46. Per Section 390-50.D.(5), "Embankment slope. The maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical." *The plan proposes the embankments to be graded at 3 to 1 and shall be revised to meet the ordinance requirement accordingly. (Previous Comment 46) The design engineer has requested a waiver to this requirement. The justification states, "Due to the slope of the site, 3:1 basin slope are being requested to minimize the required disturbance to the existing vegetation while providing a stable and maintainable slopes." We have no objection to this waiver request.*



47. Per 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." *The basin appears to be flat across the basin bottom due to its design as an MRC basin. If requested, we would support a waiver to this requirement since a flat bottom is required for infiltration. (Previous Comment 47) The design engineer has requested a waiver to this requirement. The justification states, "The MRC basin has a 6" diameter underdrain network via infiltration. A flat bottom ensures that the MRC basin is properly infiltrating and collecting said infiltration evenly." We have no objection to this waiver request.*
48. Previous Comment 48 satisfied.
49. In accordance with Section 390-50.D.(11)(g), "The upstream edge of the emergency spillway shall be a minimum of three feet below the spillway crest elevation." *The plans shall show the extent of the spillway material to demonstrate compliance with this requirement. (Previous Comment 49) The MRC Basin Permanent Emergency Spillway on Sheets C-806.2 and C-147.3 must be revised to show conformance with the requirement for the spillway material to extend three feet below the spillway crest elevation.*
- 50.-54. Previous Comments satisfied.
55. Per Section 390-50.D.(17), "A cutoff trench (keyway) of impervious material shall be provided under all embankments that require fill material. The cutoff trench shall be a minimum of eight feet wide, two feet deep and have side slopes of one-to-one." *A keyway meeting the requirements of this section shall be provided. The Clay Core currently shown on the plans is not adequate in size. Also, the keyway is required for entire length of the basin berm that is in a fill condition. (Previous Comment 55) The height dimension for the Clay Core must be added to the detail on Sheet C-806.1.*
56. 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. (Previous Comment 56) The response letter acknowledges this requirement.*
57. 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. (Previous Comment 57) The response letter acknowledges this requirement.*
58. 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 provided. (Previous Comment 58) The response letter acknowledges this requirement.

59. 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. (Previous Comment 59) The response letter acknowledges this requirement.*
60. 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. (Previous Comment 60) The response letter acknowledges this requirement.*
61. 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. (Previous Comment 61) The response letter acknowledges this requirement.*
62. 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. (Previous Comment 62) The tree protection fencing has been added to the E&S plans, but it is also required to be shown on the landscape plans.*
63. 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. (Previous Comment 63) The clear sight triangles shall be located at the intersection of the MCTA driveway at MCTA Drive and at the intersection of MCTA Drive and Route 0611.*
- 64.-66. Previous Comments satisfied.
67. Per Section 390-55.D.(1)(a), "Street trees required. Street trees shall be required Along all existing streets abutting or within the proposed subdivision or land development." *Street trees are required along SR0611. (Previous Comment 67) The design engineer has requested a waiver to this requirement. The justification states, "There are existing trees along SR0611 and existing overhead wires that would restrict the placement of additional street trees."*



68. Per Section 390-55.E.(3), "Basin grades. Minimum grades inside stormwater basins shall be 1% unless infiltration is an integral part of the design; and maximum side slopes of the basin shall be 33% (3:1 slope)." *The basin bottoms are proposed to be flat for managed release (MRC) purposes. Therefore, we would not be opposed to a waiver to this requirement if the applicant were to request it. (Previous Comment 68) The design engineer has requested a waiver to this requirement. The justification states, "The MRC basin has a 6" diameter underdrain network via infiltration. A flat bottom ensures that the MRC basin is properly infiltrating and collecting said infiltration evenly." We have no objection to this waiver request.*
69. Previous Comment 69 satisfied.
70. In accordance with Sections 390-55.F.(3)(g) and (h), "Existing healthy trees, shrubs, or woodlands may be substituted for part or all of the required plants with the approval of the Township. The minimum quantities and/or visual effect of the existing vegetation shall be equal to or exceed that of the required buffer as determined by the Township." and "Existing topographic conditions, such as embankments or berms, in conjunction with existing vegetation, may be substituted for part or all of the required property line buffers with the approval of the Township. The minimum visual effect shall be equal to or exceed that of the required buffer." *If the Applicant is requesting either of these substitutions, a demonstration of the equivalency shall be provided. (Previous Comment 70) The response letter states, "Existing, deciduous trees are located between the rear fenceline (east property line) and the 50' wide utility easement. Stantec is proposing to take credit for the existing deciduous tree as equivalent to the required deciduous Canopy Trees and Ornamental Trees for a portion of this limit (see landscape plan). Evergreen trees are proposed as required (5/100 LF) along this same area, in some of the open areas, and will create a more effective screen in combination with the existing deciduous trees." We take no issue with this request based on the unique existing site conditions.*
71. Previous Comment 71 satisfied.
72. 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. (Previous Comment 72) The response letter acknowledges this requirement.*
- 73.-74. Previous Comments satisfied.
75. 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. (Previous Comment 75) The response letter acknowledges this requirement.*
76. 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 proposed 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 plans do not contain any information on the proposed lighting. Lighting plans conforming to the ordinance requirements shall be submitted. (Previous Comment 76) Lighting plans have been provided with the current submission. The plans must be revised to show the layout and location of all proposed fixtures included in the tabulation. Additionally, several proposed fixtures that are shown on the plan must be labeled.

77. In accordance with Section 390-56.A.(5), design standards shall apply to all lighting fixtures. *Lighting plans shall comply with this section and include any notes required with respect to IESNA cutoff requirements. (Previous Comment 77) Lighting plans have been provided with the current submission. The following are noted:*
- a. *Per Section 390-56.A.(5)(a), “All lighting fixtures for off-street parking areas, off-street loading areas, driveways and for safety of persons and property must meet IESNA full cutoff.” The plans must specify the required full cutoff.*
 - b. *Per Section 390-56.A.(5)(c), “The maximum height of light fixtures, including the mounting base, is as follows: [1] Full-cutoff fixtures with 44,000 lumen lamps maximum. In parking lots: 20 feet AFG (above finished grade).” The mounting height of the new pole lighting is 30-feet plus a 3-foot base for a total of 33-feet. These must be revised to meet the ordinance requirements.*
78. Per Section 390-56.A.(6), lighting shall meet the specified performance standards. *Lighting plans conforming to the ordinance performance standards shall be submitted. (Previous Comment 78) Lighting plans have been provided with the current submission. The following are noted:*
- a. *Per Section 390-56.A.(6)(a), “All lighting shall be effectively shielded and shall be installed and/or aimed so as to shield nearby public or private property from direct glare that may create a safety hazard.” The required shielding shall be indicated.*
 - b. *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 luminaire schedule indicates numerous wall-mounted fixtures; however, the plan does not indicate where these are to be located. The fixture locations shall be shown on the plan and shall not be permitted to illuminate parking areas.*
79. Previous Comment 79 satisfied.
80. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:
- A. Section 390-58.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 \$14,994.00 (10.71 disturbed acres * \$1,400.00). (Previous Comment 80) The response letter indicates the Applicant will discuss this requirement with the Township.*

81.-82. Previous Comments satisfied.

STORMWATER MANAGEMENT ORDINANCE COMMENTS

Waivers in Comments 84, 88, and 89 have been requested.

83. Previous Comment 83 satisfied.

84. In accordance with Section 365-8.L., "Roof drains should not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment." *The plans show the roof drains for the existing and proposed buildings connecting directly into the storm sewer. If requested, we would support a waiver to this requirement, since the roof water is "clean" and to allow the water to cross the parking area would add pollutants and increase temperature. (Previous Comment 84) The design engineer has requested a waiver to this requirement. The justification states, "Since the roof water is "clean", and to allow the water to cross the parking area would add pollutants and increase temperature, a direct connection to the storm sewer could reduce pollutants to the MRC bed and thermal impacts to the receiving stream." We have no objection to this waiver request.*

85.-87. Previous Comments satisfied.

88. In accordance with Section 365-13.B., "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 A^{III} of this chapter. If a hydrologic computer model such as PSRM or HEC-1 is used for stormwater runoff calculations, then the duration of rainfall shall be 24 hours. The NRCS "S" curve shown in Figure B-1, Appendix A of this chapter, shall be used for the rainfall distribution." *The Stormwater Management Report utilizes rainfall values from NOAA Atlas 14, Volume 2, Version 3, location Swiftwater, PA". We have no objection to the Applicant requesting a waiver from this Section to utilize the rainfall data from NOAA. (Previous Comment 88) The design engineer has requested a waiver to this requirement. The justification states, "The stormwater management report utilizes rainfall values*



from NOAA Atlas 14, Volume 2, Version 3, location Swiftwater, PA per PADEP design standards." We have no objection to this waiver request.

89. In accordance with Section 365-13.C, "For the purposes of existing conditions flow rate determination, undeveloped land shall be considered as "meadow" in good condition, unless the natural ground cover generates a lower curve number or Rational "C" value, as listed in Table B-2 or B-3 in Appendix A of this chapter." *Table 5 on page 13 of the stormwater report indicates that 20% of the existing impervious surface within the LOD was considered as "meadow" in the calculations. The ordinance requires all of the impervious to be considered as "meadow". Therefore, the calculations shall be revised accordingly. (Previous Comment 89) The design engineer has requested a waiver to this requirement. The justification states, "Areas tributary to the existing stormwater management basin, to remain, are being modeled as existing ground cover. The intent of the design is to maintain the tributary areas to the existing basin. Other areas are to be modeled as per the Ordinance requirement." We have no objection to this waiver request.*

90.-91. Previous Comments satisfied.

92. In accordance with Section 365-15.A, "Any earth disturbance must be conducted in conformance with Pennsylvania Title 25, Chapter 102, Erosion and Sediment Control." *The proposed disturbance is greater than one acre, therefore, a NPDES Permit from the Monroe County Conservation District is required. All correspondence with, submissions to, and NPDES Permit from the County Conservation District, shall be provided to the Township. (Previous Comment 92) The response letter acknowledges this requirement.*

93. In accordance with Sections 365-17 and 365-19.A.(4), for any of the activities regulated by this chapter, the preliminary or final approval of subdivision and/or land development plans, the issuance of any building or occupancy permit, or the commencement of any earth disturbance may not proceed until the applicant or his/her agent has received written approval of a stormwater management site plan from the municipality, an adequate erosion and sediment control plan review by the Conservation District and an NPDES permit from the DEP, if required. *The proposed disturbed area is greater than one (1) acre, therefore an NPDES Permit is required. The Applicant shall provide a copy of the NPDES Permit and the Letter of Determination of Adequacy from the Monroe County Conservation District, as well as any correspondence pertaining to the review. (Previous Comment 93) The response letter acknowledges this requirement.*

94.-97. Previous Comments satisfied.

98. In accordance with Section 365-19.B.(19), the stormwater site plan shall contain "A fifteen-foot-wide access easement to and around all stormwater management facilities that would provide ingress to and egress from a public right-of-way." *This easement shall be provided on the plan. In the alternative, the plan may note a blanket easement for access. (Previous Comment 98) The easement or blanket easement must still be addressed on the plans.*

99.-101. Previous Comments satisfied.

102. In accordance with Section 365-27.A., "For subdivisions and land developments, the applicant shall provide a performance guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved stormwater management site plan in the amount and method of payment provided for in Chapter 390, Subdivision and Land



Development.” *A construction cost estimate for the stormwater management facilities shall be provided to the Township to determine the amount to be required for the performance guarantee. The performance guarantee shall be provided to the Township as part of the Final Plan submission. (Previous Comment 102) The response letter states, “MCTA will discuss this requirement with the Township.”*

103. Previous Comment 103 satisfied.

104. In accordance with Section 365-29., “Prior to approval of the site's stormwater management site plan, the applicant shall sign and record a maintenance agreement in form and substance satisfactory to the Board of Commissioners, covering all stormwater control facilities that are to be privately owned.” *This shall be completed at the time of Final Plan approval and as required by this Section. (Previous Comment 104) The response letter acknowledges this requirement.*

STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS

105.-112. Previous Comments satisfied.

113. The rip-rap table on page A-13 does not match the table on the E&S plan. The discrepancies shall be corrected. *(Previous Comment 113) The rip-rap summary table on page A-33 of the report still does not match the tables on Sheets C-147.4 and C-806.5. The discrepancies shall be corrected.*

114.-115. Previous Comments satisfied.

116. Appendix C is labeled as “100-year Emergency Spillway HydroCAD Model Run”. The actual spillway design calculations must also be included within this section. *(Previous Comment 116) The Emergency Spillways shall be designed for the 100-year inflow to the basin, e.g., 59.89 cfs for the MRC basin and 60.95 cfs for the forebay. The design calculations are based on only 1.5 cfs on page C-143 of the report. The calculations shall be revised accordingly.*

117.-121. Previous Comments satisfied.

MISCELLANEOUS COMMENTS

122.-130. Previous Comments satisfied.

131. The existing lot area in the Zoning Data table on Sheets C-101, C-121, and C-122 shall be revised to match the “MCTA Lot Line Adjustment Plan”. *(Previous Comment 131) The areas on the recorded plan are 36.148 Acres Gross and 34.950 Acres Net. The land development plan shall match the recorded plan.*

132.-139. Previous Comments satisfied.

140. The FloGard Detail on Sheet C-502 indicates installation only on Inlet ST12. Utility Plan Sheet C-151 shows the FloGard on Inlets ST11 and ST12. The detail on Sheet C-808 indicates installation on Inlets ST5, ST6, ST7, ST8, ST9, ST10, ST11, and ST12. These discrepancies shall be resolved. *(Previous Comment 140) The response letter states, “FloGard inserts will be installed in inlets ST4, ST4A, ST5, ST6, ST7, ST8, ST9, ST10, ST11, and ST12. The detail on sheet C-806.3 has been revised*



reference the PCSM plan for FloGuard locations." Sheet C-503 indicates the FloGard Filter is to be used only in Inlets ST11 and ST12. This discrepancy shall be eliminated.

141.-146. Previous Comments satisfied.

147. The PCSM Underdrain Detail on Sheet C-806 should clarify any geotextile to be used around the aggregate envelope as recommended in DEP's MRC guidance document. *(Previous Comment 147) A detail has been added to Sheet C-806.1; however, there are no dimensions on the aggregate envelope. The dimensions must be added to the detail.*

148.-150. Previous Comments satisfied.

151. There is a leader line note on the Permanent Emergency Spillway that states "RECP-5A TRM Spillway Protection". A detail for this protection shall be added to the plans and the spillway lining shown in plan view throughout the plan set. Additionally, the spillway for the forebay appears to be rock, not geotextile, based on the plan view depiction. This shall also be clarified. *(Previous Comment 151) A detail for the RECP-5A TRM Spillway Protection lining must still be added to the plans.*

152. Dimensions shall be added to the anti-seep collar detail on Sheet C-808. *(Previous Comment 152) Additional information has been added to the anti-seep collar detail on Sheet 806.1. The detail now indicates the collar is to be "1/4" High Density Polyethylene"; however, the calculations on page A-39 of the report state that the collars are to be concrete. This discrepancy shall be corrected.*

153. Previous Comment 153 satisfied.

154. *The adjacent Zoning District shall be labeled on Sheet C-101. (New Comment)*

155. *A Chain Link Fence Pedestrian Gate detail is show on Sheet C-502. The gate is labeled with a 4' nominal opening, but the plans show 10'wide double personnel gates. The detail shall be revised to match the plan. (New Comment)*

156. *The Clay Core Detail on Sheet C-806.1 contains a note referencing Sheet C-104. Since there is no sheet with that number in the plan set, the reference shall be corrected. (New Comment)*

157. *The pipe lengths and inverts in and out for the profile "A-A" on Sheet C-806.2 must be labeled. (New Comment)*

158. *A guiderail detail shall be added to the plan set. (New Comment)*

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development and Subdivision Plan.



In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions, please call me.

Sincerely,

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

JST/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Richard Schlameuss – CEO, MCTA (rschlameuss@gomcta.com)
John F. Grant, P.E. – Stantec (john.grant@stantec.com)
Kristina Heaney – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates



YOUR GOALS. OUR MISSION.

April 9, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: TANNERSVILLE POINT APARTMENTS – PRELIM/FINAL LAND DEVELOPMENT
PLAN AND LOT CONSOLIDATION – REVIEW NO. 3
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1358, T&M PROJECT NO. POCO-R0730**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed our third review of the Preliminary/Final Land Development Plan and Lot Consolidation Application for the Tannersville Point Apartments. The submitted information consists of the following items.

- Land Development Response Letter prepared by Keystone Consulting Engineers, dated March 11, 2025.
- Stormwater & Technical Review Response Letter prepared by Keystone Consulting Engineers, dated March 11, 2025.
- Waiver Request Letter prepared by Keystone Consulting Engineers, dated September 4, 2024, revised March 11, 2025.
- Email from StormTrap dated November 12, 2024.
- Community and Financial Impact Analysis prepared by Keystone Consulting Engineers, dated March 11, 2025.
- Resource Impact and Conservation Analysis prepared by Keystone Consulting Engineers, dated March 11, 2025.
- Preliminary Site Investigation Report prepared by Keystone Consulting Engineers, dated December 18, 2023.
- Site Context Map prepared by Keystone Consulting Engineers, dated September 5, 2024, last revised March 11, 2025.
- Legal Description for Permanent Stormwater Management Easement dated January 27, 2025, revised January 30, 2025.
- Legal Description for Temporary Construction Easement dated January 27, 2025, revised January 30, 2025.
- Legal Description for Pump Station Easement dated March 3, 2025.
- Legal Description for Sanitary Easement dated March 3, 2025.
- Legal Description for Water Meter Pit Easement dated March 3, 2025.
- Legal Description for Consolidated Property Description dated February 26, 2025.
- Closure Report for Permanent Stormwater Management Easement dated January 29, 2025.
- Closure Report for Temporary Construction Easement dated January 29, 2025.



- Closure Report for Consolidated Property dated February 26, 2025.
- PennDOT HOP Plan set prepared by Keystone Consulting Engineers, 15 sheets, last dated February 25, 2025.
- PennDOT Cycle 4 response letter dated October 17, 2024.
- Cycle 5 Submission letter prepared by Keystone Consulting Engineers, dated March 11, 2025.
- Transportation Impact Assessment prepared by Keystone Consulting Engineers, dated December 21, 2023, last revised September 19, 2024.
- Existing Resources and Site Analysis Map prepared by Keystone Consulting Engineers, dated September 5, 2024.
- Site Context Map prepared by Keystone Consulting Engineers, dated September 5, 2024.
- Architectural Floor Plans and Elevation for Proposed Multi-Family 48 Unit 4-Story Apartment Building prepared by Jacob Solomon, 5 sheets, dated February 12, 2025.
- Erosion Control Narrative prepared by Keystone Consulting Engineers, dated May 24, 2024, last revised March 11, 2025.
- Post Construction Stormwater Narrative prepared by Keystone Consulting Engineers, dated May 24, 2024, last revised March 11, 2025.
- Tannersville Point Apartments Minor Subdivision Plan (Preliminary/Final) and Land Development (Preliminary/Final) Plan set prepared by Keystone Consulting Engineers, 67 sheets, dated May 24, 2024, last revised March 11, 2025.

BACKGROUND INFORMATION

The Applicant, Tannersville Point LLC, has submitted a plan proposing the Tannersville Point Apartments Land Development and Lot Consolidation at the southeastern corner of the intersection of Warner Road (S.R. 4012) and Interstate Route 80. The existing property is located within the C, Commercial Zoning District and consists of two parcels (Tax ID Nos. 12/7/1/28-2 and 12/7/1/28-3). The property has an area of 26.96 acres and consists of woodland and meadow areas with existing steep slopes and wetlands.

The proposed land development is comprised of six (6) apartment buildings totaling 280 units. A community building, pool, pavilion, 636 parking spaces, and various retaining walls are also proposed. Access to the development will be via a driveway taking access from Warner Road (S.R. 4012) and located directly across from Old Mill Road. The Plan also depicts a sanitary sewer pump station, and the project is proposed to connect to public water and sewer.

Pocono Township Planning Commission previously recommended conditional Preliminary Land Development approval on February 25, 2019, for a plan for 80 apartment units on this tract. The Board of Commissioners did not act on the plan. It is our understanding that the previous plan will be withdrawn by the applicant.

In accordance with Section 470-20.B.(1)(c) and the 470 Attachment I Zoning Use Schedule, Multifamily dwellings (Apartments) are a permitted use in the C Commercial Zoning District.

The project site is located within the B-1 and B-2 Stormwater Management Districts of the Brodhead-McMichaels Watershed. The receiving water is the Pocono Creek, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).



The following comments are planning related and reflect the requirements of the Zoning Ordinance and Subdivision and Land Development Ordinance. A technical review including comments related to the Township Stormwater Management Ordinance will be provided under separate cover.

Based upon our review of the above information and our previous review letter dated October 22, 2024, we offer the following comments and/or recommendations related to the proposed development.

ZONING ORDINANCE COMMENTS

1.-5. Previous Comments satisfied.

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 therefor 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 thereof 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.*

(Previous Comment 6) The response letter acknowledges these requirements. (Previous Comment 6)

7. Previous Comment satisfied.

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 on October 15, 2024.

8. Previous Comment satisfied.

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.” *(New Comment) 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. (Previous Comment 9) No further action required at this time.

10.-11. Previous Comments satisfied.

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"x42" in size. The applicant is requesting a waiver to permit this plan size for legibility. (Previous Comment 11) 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. (Previous Comment 12) No further action required at this time.*

13. Previous Comment satisfied.

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. (Previous Comment 13) 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. (Previous Comment 14) The provided map legend identifies 15% or greater slopes; however, the ordinance requires both 15% and 25% and slopes exceeding 25% to be clearly indicated. Additionally, the slope legend appears to have been incorrectly applied to the plan as there are slopes well under 15% that have been shaded per the legend. The plan shall be corrected.*

15.-21. Previous Comments satisfied.

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. (Previous Comment 21) 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. (Previous Comment 22) The response letter states, "The requested information can be found on Sheet 3 and Sheets 8-11." While the deed book and page are provided, we are unable to find the name and address of the owner of record on those plans. The name and address of the owner of record, not the address of the site shall be added as required.*



23.-26. Previous Comments satisfied.

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. (Previous Comment 26) 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. (Previous Comment 27) No further action required at this time.*

28. Previous Comment satisfied.

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. (Previous Comment 28) The response letter states, "An offer of dedication has been provided." The offer was not included in the resubmission and shall be provided. (Previous Comment 29) The plans now note "Sanitary Pump Station on Property to be Leased to Pocono Township". It is our understanding that the pump station facility is to be dedicated to the Township and would be located either on an easement or on property owned "fee simple" by the Township. The Township would not "lease" the property, therefore, the plans shall be revised to eliminate this terminology.*

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. (Previous Comment 29) 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. (Previous Comment 30) The response letter states, "The title search is to be provided under separate cover from the project attorney's office." The title search still must be provided to the Township.*

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. (Previous Comment 30) The response letter acknowledges this requirement. (Previous Comment 31)*

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. (Previous Comment 31) The response letter acknowledges this requirement. (Previous Comment 32)*

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. (Previous Comment 32) The response letter acknowledges this requirement. (Previous Comment 33)*



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 Plant capacity*
- f. *Pennsylvania Department of Transportation – Highway Occupancy Permit*
- g. *Pocono Township Fire Department*

(Previous Comment 33) The response letter acknowledges these requirements and an approvals table has been added to the cover sheet. (Previous Comment 34)

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. (Previous Comment 34) The response letter acknowledges this requirement. (Previous Comment 35)*

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 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. (Previous Comment 35) The response letter acknowledges this requirement. (Previous Comment 36) The response letter states, "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." It is noted that the access to the easement appears to be blocked by the landscaping. The response from PPL shall be provided when received.*

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. (Previous Comment 36) The response letter acknowledges this requirement. (Previous Comment 37)*

- 38.-41. Previous Comments satisfied.



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 Recorder 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. (Previous Comment 41) A construction cost estimate has been provided. It will be reviewed under separate cover when the plan revisions are nearing completion. (Previous Comment 42)

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. (Previous Comment 42) The response letter acknowledges this requirement. (Previous Comment 43)*

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. (Previous Comment 43) The response letter acknowledges this requirement. (Previous Comment 44)*

45. Previous Comment satisfied.

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. (Previous Comment 45) 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. (Previous Comment 46) While some tree protection fence has been added to the plan, it still has not been shown along the proposed tree line on the eastern side of the site nor has it been shown along all limit of disturbance lines (where there is no tree line). The plans shall be revised to include the entire limit of disturbance and/or along the dripline of the trees to be preserved, whichever is applicable.

47.-48. Previous Comments satisfied.

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. (Previous Comment 48) The response letter acknowledges these requirements. (Previous Comment 49)*

50. Previous Comment satisfied.

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. (Previous Comment 50) 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. (Previous Comment 51) The landscape plans show a shaded area labeled as "PennDOT Clear Sight Triangle". The clear sight triangle should be a standard minimum of 75 feet along each road/driveway leg with no obstructions. The plans shall be revised and the obstructing landscape material relocated. A clear sight triangle must also be provided for the emergency access driveway.*

52. Previous Comment satisfied.

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. (Previous Comment 52) The response letter acknowledges this requirement. (Previous Comment 53)

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. (Previous Comment 53) The plans must still address the compliance of the new pump station access drive/emergency access to Warner Road. (Previous Comment 54) The response letter states, "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." The referenced PennDOT review letter does not appear to have a comment regarding this access drive slope. The grade shall be adjusted to meet the ordinance limitation of 4%.*

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. (Previous Comment 54) 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. (Previous Comment 55) No further action required at this time.*
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. (Previous Comment 55) 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. (Previous Comment 56) No further action required at this time.*
57. Previous Comment satisfied.
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. (Previous Comment 57) 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 (61 m) 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.

(Previous Comment 58) No further action required at this time.

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 § 390-48X(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. (Previous Comment 58) 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. (Previous Comment 59) The response letter states, "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."*

The applicant, not the Township, shall decide whether they want to permit parking on this portion of the driveway or not. The plans are currently contradictory. If no parking will be permitted, then the cartway shall be reduced to the referenced 24 feet (which exceeds the minimum width of a Local Road). If parking will be permitted, then the 32-foot wide cartway would accommodate parking on one side only and must be signed/marked accordingly.

60. Previous Comment satisfied.
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 is impracticable, the construction of the basin shall utilize slopes as flat as possible to blend the structure into the terrain." *(New Comment) 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. (Previous Comment 61) No further action required at this time.*
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. (Previous Comment 60) 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. (Previous Comment 62) No further action required at this time.*



63. Previous Comment satisfied.
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. (Previous Comment 62) The response letter acknowledges this requirement. (Previous Comment 64)*
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. (Previous Comment 63) The response letter acknowledges this requirement. (Previous Comment 65)*
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. (Previous Comment 64) The response letter acknowledges this requirement. (Previous Comment 66)*
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. (Previous Comment 65) The response letter acknowledges this requirement. (Previous Comment 67)*
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. (Previous Comment 66) The response letter acknowledges this requirement. (Previous Comment 68)*
69. Previous Comment satisfied.



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. (Previous Comment 68) The response letter acknowledges this requirement. (Previous Comment 70)*
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. (Previous Comment 69) The response letter acknowledges this requirement. (Previous Comment 71)*
72. Previous Comment satisfied.
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. (Previous Comment 71) 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. (Previous Comment 73) While some tree protection fence has been added to the plan, it still has not been shown along the proposed tree line on the eastern side of the site nor has it been shown along all limit of disturbance lines (where there is no tree line). The plans shall be revised to include the entire limit of disturbance and/or along the dripline of the trees to be preserved, whichever is applicable.*
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. (Previous Comment 72) 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. (Previous Comment 74) The landscape plans show a shaded area labeled as "PennDOT Clear Sight Triangle". The clear sight triangle should be a standard minimum of 75 feet along each road/driveway leg with no obstructions. The plans shall be revised and the obstructing landscape material relocated. A clear sight triangle must also be provided for the emergency access driveway.*



75. Previous Comment satisfied.
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. (Previous Comment 73) 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. (Previous Comment 76) The response letter states, "The lighting will be revised and submitted under separate cover."*
77. Previous Comment satisfied.
78. In accordance with Section 390-55.D.(3)(a), "Trees shall be planted a minimum distance of five feet and a maximum distance of 15 feet outside the ultimate right-of-way line." *Most of the proposed street trees along Warner Road are located greater than 15 feet from the right-of-way. The plantings must be relocated to comply with this Section. (Previous Comment 75 from Review Letter #1) While this comment was previously satisfied, the revised plan now shows only fourteen (14) street trees located within the required distance from the ultimate right-of-way line. Seventeen (17) are required; therefore, three (3) additional trees must be located within the required distance from the ultimate right-of-way line.*
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. (Previous Comment 76) 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. (Previous Comment 79) One (1) tree proposed at STA 8+58 along the driveway should be relocated off the irrigation valves and pipes.*
- 80.-81. Previous Comments satisfied.
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. (Previous Comment 79) 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. (Previous Comment 82) A tabulation has been added to the plans; however, the plan must identify the location of each buffer type and/or clearly identify each property line length included within each calculation as previously requested. Our comments regarding the tabulation are as follows:*
- a. *It is unclear as to what section of the ordinance the "parking area trees" tabulation on Sheet 22 is related. Per Section 390-55.C.(2), the number of planting islands and the number of*



shade trees are based on every 10 parking stalls. The tabulation appears to be based on every 5 parking spaces. This shall be revised to reflect the ordinance section and requirements.

- b. For this “residential” use, the side and rear property lines are required to be “medium” buffers. The buffer length of 3,203 feet in the plan tabulation must be further clarified. The buffer as depicted on the plans does not match the length in the table.*
- c. The tabulated “medium” buffer requires 64 evergreen, 64 ornamental, and 64 canopy trees. The plan provides 36 evergreen, 36 ornamental, and 35 canopy trees and takes credit for 1,426 existing trees. Per Section 390-55.F.(3)(g), “Existing healthy trees, shrubs, or woodlands may be substituted for part or all of the required plants with the approval of the Township. The minimum quantities and/or visual effect of the existing vegetation shall be equal to or exceed that of the required buffer as determined by the Township.” All required buffer plantings shall be shown on the plan as “proposed” and included in the construction improvements escrow. At the time of construction, the Township will determine in the field what, if any, existing vegetation can be substituted for the proposed vegetation.*
- d. The tabulated “high” buffer for the parking areas requires 119 evergreen, 48 ornamental, and 48 canopy trees. The plan provides 113 evergreen, 45 ornamental, and 43 canopy trees and takes credit for 891 existing trees. Per Section 390-55.F.(3)(g), “Existing healthy trees, shrubs, or woodlands may be substituted for part or all of the required plants with the approval of the Township. The minimum quantities and/or visual effect of the existing vegetation shall be equal to or exceed that of the required buffer as determined by the Township.” All required buffer plantings shall be shown on the plan as “proposed” and included in the construction improvements escrow. At the time of construction, the Township will determine in the field what, if any, existing vegetation can be substituted for the proposed vegetation..*
- e. Per Section 390-55.F.(3)(d)[3], “Parking shall not be permitted in the buffer area.” One parking space is shown to encroach into the depicted 30’ Landscape Buffer along Warner Road and must be relocated.*

83.-84. Previous Comments satisfied.

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. (Previous Comment 82) 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. (Previous Comment 85) The plans now depict a Screen Type No. 9 Low Wall for the dumpster areas. This is not a permitted screen type for the dumpsters. Screen Type No. 4 or 8 shall be used. The plans shall be revised accordingly.*

86.-88. Previous Comments satisfied.

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. (Previous*



Comment 86) A construction cost estimate has been provided. It will be reviewed under separate cover when the plan revisions are nearing completion. (Previous Comment 89)

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 proposed 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. (Previous Comment 87) 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. (Previous Comment 90) The response letter states, "The lighting will be revised and submitted under separate cover."

91. Previous Comment satisfied.
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. (Previous Comment 89) 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. (Previous Comment 92) The response letter states, "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." *(New Comment) 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. (Previous Comment 93) The response letter states, "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. (Previous Comment 90) 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. (Previous Comment 94) The wetland protection fence is now shown to be directly on the edge of the wetlands. It must be located a minimum of 20 feet outside the delineated wetland boundary. It is noted that the required location of the fence does not prohibit permitted activities within the wetland buffers per Section 365-10.I.(6)(b).*

95. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:

- A. Section 390-58.3B.(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. (From Previous Comment 95)

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. (Previous Comment 92) 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. (Previous Comment 96) The response letter states, “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.” The easement must be secured from the adjacent property owner and a copy of the executed easement provided to the Township prior to Preliminary/Final Plan Approval.*



MISCELLANEOUS COMMENTS

97. Previous Comment satisfied.
98. The Applicant shall coordinate with the school district for school bus stops. *(Previous Comment 94)*
The response letter acknowledges this requirement. (Previous Comment 98)
- 99.-104. Previous Comments satisfied.
105. An R1-3P (All Way) sign should be added to each leg of the 3-way intersection south of Building 3. *(Previous Comment 101)* *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. (Previous Comment 105)* *While the size of the R1-3P has now been corrected, a stop sign is still also required at each of these intersections. The stop signs shall be added to the plan at the sign locations.*
- 106.-113. Previous Comments satisfied.
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. *(Previous Comment 110)* *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." (Previous Comment 114)* *The response letter states, "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." A copy of the executed stormwater easement must be provided to the Township prior to Preliminary/Final Plan Approval.*
115. Previous Comment satisfied.
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. *(Previous Comment 112)* *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. (Previous Comment 116)* *Spot Grade Plans (Sheets 17 and 18) have been added to the plan set. Our comments with respect to those sheets are as follows:*
- a. *Additional spot elevations at and around the handicapped parking spaces to demonstrate compliance with the slope limitations in the ADA guidelines.*
 - b. *TC elevations for the curb at the handicapped parking in front of Buildings 1, 3, 4, 5, and 6 are higher than the FFE of the buildings. Additional spot elevations should be provided to demonstrate the accessibility of these areas and positive drainage away from the building.*
 - c. *It is unclear why Building 2 has a fully depressed curb along the entire handicapped parking*



area, but the other buildings do not.

- d. *The grade difference between the FFE and the adjacent ground is shown to be as little as 0.1 feet. The Building Code under Section R404.1.6 of the 2018 IRC requires a minimum of 6" from the top of foundation to grade for wood frame without masonry veneer and requires 4" for buildings with masonry veneer. The code also requires 6" of fall away from the building for the first 10'. The grades shall be revised to meet the Building Code requirements.*
- e. *Numerous locations on the Spot Grade Plans (Sheets 17 and 18) have spot elevations at the same locations as inlets and which do not match the inlet grate elevations shown on other plan sheets. The discrepancies between the elevations shall be resolved.*
- f. *The proposed contours should be added to Sheet 18.*
- g. *The Community Center must be added to these plans. The grade along the north side of the building is significantly higher than the proposed FFE. The pool deck is also higher than the FFE. Potential for accessibility must also be demonstrated.*

117.-129. Previous Comments satisfied.

PLAN REVISION COMMENT

130. Previous Comment satisfied.

131. The overall record plan shall reference the proposed project phasing. *(New Comment) (Previous Comment 131) The response letter states, "The proposed project phasing is noted on the Record Plans." We are unable to locate this information on the Record Plans. The location shall be clarified.*

132.-133. Previous Comments satisfied.

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. *(New Comment) (Previous Comment 134) The labeling of I-80 is now missing from Sheets 41, 42, 43, 45, 46, 47, 49, 50, 51, 57, 58, and 59 and must be added.*

135. Previous Comment satisfied.

136. Depressed curb locations such as at the emergency access points and the dumpster locations (with curb) must be identified on the plans. *(New Comment) (Previous Comment 136) Depressed curb should also be identified at the crosswalks near STA 12+40.*

137.-143. Previous Comments satisfied.

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. *(New Comment) (Previous Comment 144) The response letter states, "The lighting will be revised and submitted under separate cover."*



145.-155. Previous Comments satisfied.

- 156. The proposed concrete Monuments are now missing from Sheet 3 and must be shown. *(New Comment)*
- 157. An extraneous “Proposed Tree Line” note and leader line are shown on Sheet 3 and shall be removed. *(New Comment)*
- 158. There is an overwrite on Sheet 3 between curve information at Warner Road and a concrete monument to be set. The overwrite shall be corrected. *(New Comment)*
- 159. The proposed gate at the emergency access near the pump station is too close to Warner Road. The gate must be set so that a service vehicle can pull off the road to open the gate for access to the pump station. Also, there must be adequate room for the vehicle to pull out and the driver to close the gate behind themselves. *(New Comment)*
- 160. The Crosswalk detail on Sheet 35 does not match the crosswalks shown on the plan sheets. The plans and the detail shall be consistent. *(New Comment)*
- 161. A “No Parking Area Gore Striping” detail is shown on Sheet 35. It is unclear where this is to be utilized as it is not shown in plan views. This must be clarified. *(New Comment)*
- 162. The No Parking sign detail on Sheet 36 is for a R7-302 sign. The sign tables on Sheets 6 and 7 identify the No Parking sign as being R8-3a. This inconsistency must be corrected. *(New Comment)*
- 163. It must be clarified where the curb gutter detail on Sheet 36 is being used. We are unable to locate it on the plans. If it is not being used, that portion of the detail should be crossed out or deleted. *(New Comment)*
- 164. The Beginning of the Temporary Construction Easement description should be at an iron pin “found”, not “set” and must be revised accordingly. *(New Comment)*
- 165. The Temporary Construction Easement lot closure calculations start with a line described as N57°01’09”E, 4.00 feet. It is unclear where this line is located as it is not part of the description or the exhibit. This must be clarified. *(New Comment)*
- 166. The Consolidated Property Description must be revised to reflect the most recent plan date. *(New Comment)*
- 167. The Sanitary Easement Description is actually a description of the Water Meter Pit Easement. The correct description shall be provided. Additionally, this easement will be benefitting Pocono Township. *(New Comment)*

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.



We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development and Consolidation Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments. **Additionally, the response letter shall identify the plan sheet number(s) where plan revisions were made based on our comments. A highlighted plan set may also be provided.**

If you should have any questions, please call me.

Sincerely,

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

JST/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Tannersville Point, LLC – Applicant
Alan Fornwalt, P.E. – Keystone Consulting Engineers, Inc.
Kristina Heaney – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates



YOUR GOALS. OUR MISSION.

June 5, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: BROOKDALE SPA – 2436 BACK MOUNTAIN DRIVE
PRELIMINARY/FINAL LAND DEVELOPMENT REVIEW NO. 3
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1425, T&M PROJECT NO. POCO-R0680**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a review of the Preliminary/Final Land Development Plan Application for Brookdale Spa. The submitted information consists of the following items.

- Response letter to the Land Development Review prepared by RKR Hess, dated May 9, 2025.
- Response letter to the Stormwater Management Review prepared by RKR Hess, dated May 9, 2025.
- Project Update memo prepared by RKR Hess, dated May 9, 2025.
- Act 537 Planning Conditional Approval letter prepared by PADEP, dated March 24, 2025.
- Ch. 105 Permit acknowledgement email dated May 9, 2025.
- Draft Sewage Treatment Agreement between Brookdale Enterprises and Brookdale Enterprises, LLC.
- Post Construction Stormwater Management (PCSM) & Conveyance Calculations Module 2 prepared by RKR Hess, dated August 30, 2024, last revised May 7, 2025.
- Brookdale Spa Land Development Plan set prepared by RKR Hess, 50 sheets, dated August 30, 2024, last revised May 7, 2025.

BACKGROUND INFORMATION

The Applicant, Brookdale Enterprises, LLC, has submitted a plan proposing the Brookdale Spa Land Development on the southern side of Back Mountain Road, west of the intersection of Dyson and Brookdale Roads. The existing property, Lot 2 of the Brookdale Subdivision, is located within the RD, Recreation Zoning District and consists of a single parcel (Tax ID No. 12/11/1/32-4). The property has an area of 31.59 acres and consists of mostly woodland areas with steep slopes, the Scot Run watercourse, and wetlands.

The site is proposed to be developed with a Nordic style Spa which consists of outdoor thermal and hydrothermal amenities as well as a 2-story 38,150 s.f. building with traditional spa services, restaurant, reception area, retail spaces, and locker rooms. The plans also propose a 2-story 50-bed employee housing building and a maintenance building. The previously submitted narrative states that the spa can accommodate 400 to 525 people and will have up to 55 staff members. Spa services are booked for 4-hour sessions. The plans propose 339 parking spaces, including 9 handicap spaces, 2 bus parking spaces, and 4 off-street loading spaces. Access to the development will be via a driveway taking access from Back Mountain Road. An



existing driveway access at the west end of the property is proposed to remain, but not be improved. The plan also depicts above ground and underground stormwater management facilities.

The project is proposed to be served by on-lot water and central sewage disposal. The proposed sewer system consists of a gravity collection system which conveys flows to an onsite pump station. This pump station, with a 5 Hp grinder pump, will discharge through a 4" HDPE force main to the existing Brookdale Resort Wastewater Treatment Facility. The project narrative indicates a total flow from domestic sources of 18,550 gpd.

In accordance with Section 470-19.B.(1)(b) and the 470 Attachment 1 Zoning Use Schedule Commercial indoor and outdoor recreational and entertainment uses, including restaurants, are permitted in the RD District.

The project site is located within Districts A and B-1 Stormwater Management District of the Brodhead-McMichaels Watershed. The receiving water is the Pocono Creek, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).

The Land Development Plan was accepted for review by the Pocono Township Planning Commission at its meeting held on September 9, 2024.

The following comments are planning related and reflect the requirements of the Zoning Ordinance and Subdivision and Land Development Ordinance. A technical review including comments related to the Township Stormwater Management Ordinance will be provided under separate cover.

Based on our review of the above information and our previous review letter dated February 3, 2025, we offer the following comments and/or recommendations for your consideration.

ZONING ORDINANCE COMMENTS

- 1.-2. Previous Comments 1-2 satisfied.
3. 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 therefor issued by the Zoning Officer. No such permit shall be issued except in conformity with the provisions of this chapter; and:
 - 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. *All associated stormwater management plans, erosion control plans and approvals shall be provided.*

(Previous Comment 3) The response letter acknowledges these requirements. (Previous Comment 3) The NPDES Permit is currently under review with the MCCD.

4. Previous Comment 4 satisfied.



SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Note that the Applicant is requesting waivers from SALDO requirements as discussed in Comments 17, 25, 28, 32, 52, 54, 59, 61, 65, 69, 73, 75, 78, 87, and 88. The waiver requested in Comment 21 was granted by the Board of Commissioners on November 18, 2024.

5.-10. Previous Comments 5-10 satisfied.

11. In accordance with Section 390-29.J.(7), Supporting documents and information. “Water supply information. In the case of individual on-lot wells, information documenting water table depth and potential for affecting the groundwater supply. In the case of community systems:
- (a) A statement from a professional engineer of the type and adequacy of any community water supply system proposed to serve the project.
 - (d) Privately owned central system. A statement setting forth the proposed ownership of the system and responsibility for operation and maintenance.
 - (e) A copy of any application for any permit, license or certificate required by DEP or the Pennsylvania Public Utility Commission for the construction and operation of any proposed central water supply system. Land development plan approval shall be conditioned on the issuance of said permits by PA DEP and/or PA PUC.”

The required information shall be provided. (Previous Comment 11) The response letter states, “A permit to drill the well has been issued by Pocono Township and well drilling is being coordinated with DEP and Pocono Township. The proposed water system will remain private, owned and operated by the property owner and only serve this lot. A licensed operator will operate the water system on behalf of the owner. Regulation by the PUC is not required. An application for a non-community, non-transient water supply permit will be submitted to DEP for the proposed water system. Copies of the application and permit will be provided to the Township as available.” (Previous Comment 11) The response letter states, “A well has been drilled with capacity anticipated to be adequate to provide water service for the project. The testing of the well is being scheduled and will be coordinated with DEP and the Township. The well permit documentation and permit applications will be provided to the Township as available. We intend to address the ordinance requirements as described below.

- *A statement from a professional engineer stating that the well is adequate to serve the non-community/non-transient water supply system classified by DEP will be provided prior to the start of site construction.*
- *A permit application for the DEP water supply permit will be submitted prior to the start of site construction.*
- *The details of the well pump and water supply treatment and storage facilities will be provided for shop drawing review during the construction process and coordinates with the Building Permit process for facilities in the building requiring building permit issuance.*
- *A DEP water supply permit will be obtained prior to the issuance of an certificate of occupancy permit for the buildings on the site.*
- *The water system components are entirely located on the Brookdale Spa site and are proposed to only serve the site. The operation and maintenance of the water supply system is the responsibility of the property owner as stated in note 11 on the plans.*
- *The O&M plan will be provided up construction of the water system, prior to the issuance of occupancy permit for the project.”*



(Previous Comment 11) Based on the Ordinance language, Land Development plan approval may be conditioned on the issuance of the required permits by PADEP. It is noted that a safe, viable source of water is a critical component of any land development.

12. In accordance with Section 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 – Comment letter dated September 24, 2024 received.*
 - b. Monroe County Conservation District/Pennsylvania Department of Environmental Protection – NPDES Permit (Pending)*
 - c. Pennsylvania Department of Environmental Protection – Sewage Facilities Planning Module, Water Supply Permit – Conditional Approval of Sewage Planning received March 24, 2025.*
 - d. PADEP/USACE – Ch. 105 Small Projects Joint Permit (Pending)*
 - e. Pocono Township Fire Department – Meeting summary notes of 10/10/24 received.*

(Previous Comment 12) The response letter acknowledges these requirements and a permits table has been added to the cover sheet. (Previous Comment 12)

13. In accordance with Section 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. (Previous Comment 13) The response letter acknowledges this requirement. (Previous Comment 13) The NPDES Permit is currently under review with the MCCD.*
14. Previous Comment 14 satisfied.
15. 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 Recorder 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 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. (Previous Comment 15) The response letter acknowledges this requirement. (Previous Comment 15) The response letter states, “The construction cost estimate of required improvements is being prepared and will be submitted separately.”



16. Previous Comment 16 satisfied.
17. 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, sewage system, and water supply. (Previous Comment 17) The response letter acknowledges the requirement for operation and maintenance agreements. A waiver has been requested from the provision of an escrow fund for the maintenance and operation of the stormwater, sanitary sewer, and water improvements. The justification states, in part, “This requirement for a guaranteed maintenance fund is appropriate where common facilities are provided by a developer and lots or portions of the project are conveyed to other owners who will be responsible for the long term maintenance of the facilities when the developer is gone. In this case, entity responsible for the operation and maintenance of the required improvements is the entity who owns the property. Because of this, we request the operation and maintenance requirements be clearly documented in agreements with the property owner but the requirement for financial security for operation and maintenance of required site improvements be waived.” The Board of Commissioners must make this determination. (Previous Comment 17) The Board of Commissioners must make a determination on this waiver request.*
- 18.-20. Previous Comments 18-20 satisfied.
21. 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.” *As noted in the Sketch Plan review, Back Mountain Road is a Collector Road. Minimum design standards are a 60’ right-of-way, 20’ travel way, and 28’ cartway with shoulders. The plans appear to show a 60’ proposed ultimate right-of-way, a 19’ existing travel way, and a 20.6’ existing cartway. Therefore, the plans shall be revised to reflect the required travel way and cartway along the property frontage to meet the ordinance requirements. (Previous Comment 21) This requirement was waived by the Board of Commissioners on November 18, 2024. (Previous Comment 21) No further action required.*
- 22.-24. Previous Comments 22-24 satisfied.
25. 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%.” *A profile shall be added to the plans must demonstrate compliance with this requirement. (Previous Comment 25) A waiver has been requested to permit the access drive slope to be 12%. The justification states “The proposed grade of the driveway of 12% is consistent with the grades allowable for a local road. The*



12% grade is necessary to minimize grading and environmental impacts necessary to access the developable portion of the site from the location on Back Mountain Road suitable for driveway access based on the required design requirements.” The Request for Modification shall be revised to reference the correct ordinance section (13) instead of (12). We have no objection to this waiver request. (Previous Comment 25) This waiver was recommended by the Planning Commission on March 10, 2025.

26. Previous Comment 26 satisfied.
27. Per Section 390-48.T.(14), “Concrete aprons shall be provided for all access drives with concrete sidewalks.” *A concrete apron must be provided for the driveway at Back Mountain Road. (Previous Comment 27) The applicant shall discuss this requirement with the Board of Commissioners. (Also see related Comment 29)*
28. Per Section 390-48.W.(1), “Cuts and fills. The maximum slope of any earth embankment or excavation shall not exceed one foot vertical to three feet horizontal unless stabilized by a retaining wall or cribbing, except as approved by the Board of Commissioners for special conditions.” *It is noted the proposed embankments along the access drive and throughout the site are shown to be 2:1. A waiver has been requested to permit the 2:1 slopes. The justification states that erosion control matting will be provided and the stability of the slopes will be documented in a geotechnical report. The submitted geotechnical report indicates that slopes greater than 3H:1V will require additional engineering evaluation; therefore, the “additional engineering evaluation” supporting the waiver request must be provided. (Previous Comment 28) An updated geotechnical report has been provided. The waiver justification states “The NPDES standards provide for grading to be stabilized with vegetation up to slopes to 2 horizontal to 1 vertical (2:1). Slopes 3:1 and over require erosion control matting to aid in the establishment of vegetation. To minimize the impact to existing vegetated area, we are requesting to grade proposed slopes to a (2:1) slope using the required erosion control matting to establish the vegetation or provide another stable surface. The stability of these slopes is documented in the geotechnical report prepared for the site.” We have no objection to the requested waiver. (Previous Comment 28) This waiver was recommended by the Planning Commission on March 10, 2025.*
29. Per Section 390-48.AA., “Sidewalks; crosswalks. 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.” *Sidewalks are required to be provided along Back Mountain Road. (Previous Comment 29) The response letter requests that the Township confirm that offsite sidewalks are not required for this project. The Board of Commissioners must make this determination. (Previous Comment 29) The Board of Commissioners must make a determination on this waiver request.*
- 30.-31. Previous Comments 30-31 satisfied.
32. Per Section 390-50.D.(5), “Embankment slope. The maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical.” *The proposed basins show interior side slope grades of 3:1 (33%) and exterior side slopes of 2:1 (50%). A waiver has been requested to permit the 2:1 slopes. The justification states that erosion control matting will be provided and the stability of*



the slopes will be documented in a geotechnical report. The submitted geotechnical report indicates that slopes greater than 3H:1V will require additional engineering evaluation; therefore, the additional engineering evaluation" supporting the waiver request must be provided. (Previous Comment 32) An updated geotechnical report has been provided. The waiver justification states "The NPDES standards provide for grading to be stabilized with vegetation up to slopes to 2 horizontal to 1 vertical (2:1). Slopes 3:1 and over require erosion control matting to aid in the establishment of vegetation. To minimize the impact to existing vegetated area, we are requesting to grade proposed slopes to a (2:1) slope using the required erosion control matting to establish the vegetation or provide another stable surface. The stability of these slopes is documented in the geotechnical report prepared for the site." We have no objection to the requested waiver. (Previous Comment 32) This waiver was recommended by the Planning Commission on March 10, 2025.

33.-37. Previous Comments 33-37 satisfied.

38. 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. (Previous Comment 38) The response letter acknowledges this requirement.*

39. Per Section 390-52.A.(2), "All suppliers of non-municipally owned, centralized water and/or sewer services shall be organized in such a fashion as may be required by the Pennsylvania Public Utility Commission and the Developer shall provide for operation, maintenance, and continuity of services in a manner which is acceptable to the Township." *The O&M requirements and ownership/maintenance plan for the water and sewage facilities must be provided to the Township, including any certificate of public convenience from the PUC. (Previous Comment 39) The response letter acknowledges this requirement. (Previous Comment 39) A draft Sewage Treatment Agreement has been provided. A copy of the final executed agreement shall be provided to the Township for their records.*

40. Previous Comment 40 satisfied.

41. Per Section 390-52.E.(1), "Project supply. If an approved public water supply is not accessible and water is to be furnished on a project basis, the applicant shall, upon submission of the subdivision or land development plan, submit written evidence that he has complied with all Township and state regulations, and that the proposed system to be installed meets the requirements of the PA PUC, PA DEP, and any other applicable regulations." *The required documentation must be provided for the on-lot water supply. (Previous Comment 41) The response letter states, "The applicant has obtained a permit to drill the site well from Pocono Township and is coordinating the drilling and testing with DEP. Compliance with Township requirements is outlined in this letter. An application for the public water supply permit from DEP will confirm compliance with DEP standards. The water supply is anticipated to only serve this site. No PUC approvals will be required." This comment will remain until the water supply permit has been received. (Previous Comment 41) Based on the Ordinance language, it is our opinion that written evidence is required demonstrating that the water supply*



meets the requirements of PADEP prior to the approval of the Land Development Plan by the Board of Commissioners. It is noted that a safe, viable source of water is a critical component of any land development.

42. Per Section 390-52.E.(3)(a), "Wells shall be sited, drilled and tested under the direct supervisor of a registered professional engineer and/or a professional hydrogeologist." *Drilling logs, testing, and installation oversight of the well drilling and testing must be provided. (Previous Comment 42) The response letter states, "The Applicant has hired Cook Geologic to oversee the well drilling and testing." The required information shall be provided to the Township from Cook Geologic. (Previous Comment 42) Drilling logs, testing, and installation oversight of the well drilling and testing must still be provided.*
43. Previous Comment 43 satisfied.
44. Per Section 390-52.E.(3)(c), "The capacity of the well(s), as certified by a professional engineer, shall be sufficient to produce at least 110 gallons per capita per day and/or 400 gallons per day for each residential dwelling unit to be served. Adequate capacity of any well(s) to service industrial or commercial establishments shall be documented by the applicant to the satisfaction of the Township and the Township Engineer." *The design engineer is required to provide documentation that the wells can provide adequate capacity for the proposed commercial development. (Previous Comment 44) The response letter states, "The applicant will work with the Township Engineer to comply with this requirement." (Previous Comment 44) Documentation that the well can provide adequate capacity for the proposed commercial development must still be provided.*
45. Per Section 390-52.E.(3)(d), "Wells shall be pump tested utilizing a controlled step-draw down test to establish the specific capacity of each well and to establish a long-term pumping rate. The well shall be pumped at the above determined long-term pumping rate for a sufficient period of time for stabilization to occur and the recovery noted. In no case shall a pumping rate greater than the recharge rate be allowed." *The required pump testing results must be provided. (Previous Comment 45) The response letter states, "The well pump tests will be provided when completed." (Previous Comment 45) The required pump testing results must still be provided.*
46. Per Section 390-52.E.(3)(f), "Documentation of the effect of the projected area-wide drawdown of the water table may be required by the Township if the anticipated pumping of groundwater warrants such documentation." *It is unclear what other existing wells may exist on the neighboring properties that could be affected by the proposed wells. The design engineer shall identify other wells and the effect of the new well(s) within the potential drawdown area. (Previous Comment 46) The response letter states, "Pump testing of the well will be coordinated with the Township Engineer. It is anticipated that the owners of the two properties with the closest wells will cooperate to allow monitoring during the well pump test." (Previous Comment 46)*
47. Per Section 390-52.E.(4)(d), "The design and installation of any central (public or community) water supply system shall be subject to the approval of the Township, the PA DEP and other regulatory bodies having jurisdiction. Any such system shall be further subject to satisfactory provisions for the maintenance thereof. Standards and materials for the construction of any central water supply system shall meet or exceed those requirements described in the "Public Water Supply Manual of the Pennsylvania Department of Environmental Protection" and shall be subject to the approval of the Township." *The design engineer shall provide an operational and maintenance plan prepared by a*



PA Licensed Water Supply Operator. (Previous Comment 47) The response letter states, "The operation and maintenance plan for the water system will be provided when the design has been confirmed." (Previous Comment 47) It is our opinion that the water supply must be designed and permitted by the PADEP prior to the approval of the Land Development Plan by the Board of Commissioners. It is noted that a safe, viable source of water is a critical component of any land development.

48. Per Section 390-52.E.(4)(c), "In all subdivisions and land developments served by a central water system, the following water pressure and gallonage requirements shall apply: [2.] Commercial or industrial use a minimum working pressure of 30 pounds per square inch shall be provided at each commercial or industrial building connected to the water supply main. Where a building wishes to connect to a central water system, a study shall be made to determine if there is adequate water supply in the system to supply the building and use." *The required study of the distribution system must be submitted for review. (Previous Comment 48) The response letter states, "A pump system will be provided to meet the minimum pressure required for the water distribution system. The design of this system will be submitted to the Township for review." (Previous Comment 48) The pump system design must be submitted to the Township for review.*
- 49.-50. Previous Comments 49-50 satisfied.
51. Per Section 390-52.E.(4)(g)[3], "If wells are to be utilized as a part of the proposed water supply system, the number of wells, the pumping capacity of each well, the number of hours per day that each well pump operates, the depth of each well, depth of water table in each well, diameter of well casing, draw-down rated capacity of each well, the maximum sustained yield from the well test together with a copy of the well test data all shall be supplied with the proposed study." *The required well test information shall be submitted to demonstrate compliance. (Previous Comment 51) The response letter acknowledges this requirement. (Previous Comment 51) The required well test information must still be submitted to demonstrate compliance.*
52. Per Section 390-52.E.(4)(g)[7], "For any new commercial or industrial use, a minimum pressure of 30 pounds per square inch shall be provided which shall meet all potable water supply requirements for the intended use in addition to providing fire-flow water requirements for a minimum duration of two hours of not less than 500 gallons per minute at residual pressures of 30 pounds per square inch. Fire hydrants for either residential, commercial, or industrial development shall be spaced every 600 feet within the proposed development." *Documentation that the required fire flows can be met must be provided to the Township. (Previous Comment 52) A waiver is requested as related to water system design capacity for fire flow water and fire hydrants beyond the requirements for sprinkler systems for the Spa building and the employee housing building as required by the Building Code. The justification states, "Fire protection will be provided to the building by sprinklers and a dry fire hydrant will be provided on site, supplied by Brookdale Lake." We recommend this be referred to the Building Code official for input. (Previous Comment 52) This waiver was recommended by the Planning Commission on March 10, 2025.*
53. Per Section 390-52.E.(4)(g)[8], "The water supply study shall demonstrate that all potable water required for the subject subdivisions and/or land developments shall meet the water quality standards as established by the United States Environmental Protection Agency, originally listed as the National Interim Primary Drinking Water Regulations, EPA Document No. 570/9-76-003, and as further amended in the Federal Register, Wednesday, December 24, 1975, through Wednesday, August 27,



1980, and including the National Secondary Drinking Water Regulations as listed in the Federal Register, Thursday, July 19, 1979. In addition, any known carcinogens which have been identified as of the date of this chapter, and which might be identified after the date of this chapter, shall be identified in any and all testing procedures of the proposed public water supply and water supplies exceeding the established carcinogenic levels shall not be utilized for domestic purposes.” *New source water quality testing shall be provided for all wells. (Previous Comment 53) The response letter acknowledges the requirement. (Previous Comment 53) Water quality testing meeting the EPA standards must still be provided.*

54. Per Sections 390-52.E.(4.)(i)[1] and [4], “Distribution mains of the overall system shall be connected into loops so that the supply may be brought to the consumer from more than one direction.” and “Water mains shall be configured to form a loop system to enhance the continual supply of fresh water.” *The required loop must be added to the water system. (Previous Comment 54) A waiver has been requested to this requirement. The justification states, “Based on the relatively short distance between the source and the buildings and the limited service area of the proposed water system, a single water main will adequately serve project. The entire water distribution system is smaller than a typical block in a looped water system. Calculations confirm in the adequacy of the distribution system design for flow and pressure will be provided.” We have no objection to this request. (Previous Comment 54) This waiver was recommended by the Planning Commission on March 10, 2025.*
55. Per Section 390-52.E.(4.)(i)[20][a], “Water mains shall be a minimum diameter of eight inches except at the end of a permanent cul-de-sac, unless another size is required for fire flow or other criteria. A six-inch main may be used when it serves not more than 20 dwelling units and only one fire hydrant.” *The plans depict two separate 8” water lines for fire and domestic use. We recommend the size of the domestic line be reconsidered. Providing potable water at a flow rate which is able to flush the 8” line is likely not possible from a system this small. Provided there is adequate distribution capacity of a smaller diameter water mains, as justified by appropriate analysis, a waiver from this provision would be required. (Previous Comment 55) The response letter states, “The confirmation of the water main size will be provided with the detailed design of the water distribution system upon confirmation of the well capacity and building fire protection design.” (Previous Comment 55) The water distribution system must still be sized. It is our continued opinion that the size of the domestic line is too large for this small system.*
56. Previous Comment 56 satisfied.
57. Per Section 390-52.E.(4)(k), “If the proposed subdivision or land development will utilize groundwater as the source of potable water, a hydrogeology study shall accompany the preliminary plan.” *The required study shall be provided. (Previous Comment 57) The response letter states, “A hydrogeologic study for the development of the site water supply will be provided.” (Previous Comment 57) The hydrogeologic study must still be provided.*
58. Per Section 390-52.E.(5), “Flow rates. Distribution systems serving commercial or industrial developments shall provide for a minimum flow rate of at least 2.5 times the projected average daily flow rate or a minimum flow rate in accordance with the standards of the National Fire Underwriters Association, whichever is greater.” *A model of the distribution system shall be provided to demonstrate that the required flows can be provided. (Previous Comment 58) The response letter states, “A model of the water distribution system will be provided upon confirmation of the well capacity.” (Previous Comment 58) A model of the water distribution system must still be provided.*



59. Per Section 390-52.E.(6), “Water resources impact study. A water resources impact study shall be required for all residential developments involving 12 or more lots and any nonresidential development proposing to withdraw 4,000 or more gallons of water per day over a thirty-day period.” *The required hydrogeologic study and calculations shall be provided in a format to meet this requirement since the anticipated water usage is over 4,000 gpd. (Previous Comment 59) The response letter states, “A water resource impact study will be provided as required by DEP and as recommended by the project Professional Geologist. A waiver request of the ordinance requirements that exceed DEP requirements.”*

A waiver has been requested from Section 390-52.E(6)(d)[9] with respect to Pumping Tests. The waiver justification states, “Brookdale Enterprises, LLC proposes to conduct a 12-hour constant-rate pumping test rather than a 48-hour pumping test. Background water levels will be monitored in the pumping well and any monitoring wells for at least 72-hour prior to pumping and recovery will be monitored until 95% recovery of drawdown is observed. The pumping rate for the test will be determined based on the estimated well yield estimated during drilling or, if deemed necessary by Brookdale Enterprises, LLC, from results of a step-drawdown test. The well will be pumped at the rate at which the Professional Geologist recommends; not at 150% of the peak daily water demand.” We have no objection to the requested waiver. (Previous Comment 59) This waiver was recommended by the Planning Commission on March 10, 2025.

60. Previous Comment 60 satisfied.

61. In accordance with Section 390-52.G.(1)(b)[8], “Sewers shall be located a minimum of 10 feet horizontally from any obstruction such as a building. Sewers must be a minimum of 10 feet from a water main or 18 inches (measured from top of sewer to bottom of water main) under the same. When a sanitary sewer line crosses above or under any other pipeline with separation of less than 18 inches, the sanitary line will be provided with concrete encasement that extends 10 feet on either side of the pipe being crossed.” *Concrete encasement locations must be shown on the plans and profiles where the minimum separation distances are not achieved. (Previous Comment 61) A waiver has been requested with respect to crossings of storm pipes with less than 12 inches of separation and for the sewer force main which cannot be encased. The justification states, “Concrete encasement will be provided as required where sewer mains cross water mains per DEP requirements. A waiver of the requirement to concrete encase sewer pipes that cross storm sewer pipes with separation of less than 18 inches cannot be maintained but more than 12 inches is maintained is requested and for the sewer forcemain where the pipe is installed by boring.” We have no objection to the requested waiver. (Previous Comment 61) This waiver was recommended by the Planning Commission on March 10, 2025.*

- 62.-64. Previous Comments 62-64 satisfied.

65. 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. Additionally, Section 390-55.B.(1)(a) states “All subdivisions and land developments shall be laid out in such a manner as to minimize the removal of healthy trees and shrubs on the site. Mature trees (six inches or greater dbh) shall be preserved insofar as possible; and special consideration shall be given to major specimen trees (12 inches or greater dbh). The plan shall show the location of major specimen trees in areas of the site proposed for development, and the edge of existing woodlands.” *The plan shall be revised to identify*



any specimen trees and to clearly show the disposition of existing vegetation on the site. This information should be provided on an existing features/demolition plan. (Previous Comment 65) A waiver has been requested with respect to the requirements to delineate individual specimen trees over 12 inches for preservation. The justification states, "The site is mostly forested. Tree masses will be maintained on undisturbed areas of the site as indicated on C.L01, especially in steep slope areas. Thousands of trees will be preserved. The limit of disturbance (LED) will be marked in the field to protect trees beyond the limit of the LED, although some trees in close proximity to the LED may be removed as necessary. The site design has carefully considered ways to limit impacts to wooded areas and conservation areas. A waiver is requested of the requirements to delineate individual specimen trees over 12 inches for preservation based on the site constraints unique to this project where complete tree clearing areas are required to accomplish the site grading in the development areas of the site and significant areas of tree preservation are proposed in environmentally sensitive areas." We have no objection to the requested waiver. (Previous Comment 65) **This waiver was recommended by the Planning Commission on March 10, 2025.**

66.-68. Previous Comments 66-68 satisfied.

69. Per Section 390-55.C.(2)(e), "Planting islands shall be a minimum of nine feet by 18 feet in dimension, underlain by soil (not base course material); mounded at no more than a 3:1 slope, nor less than a 5:1 slope; and shall be protected by curbing or bollards. Each planting island shall contain a minimum of one shade tree plus shrubs and/or ground cover sufficient to cover the entire area." *The plan shall dimension the widths of the proposed parking islands. Additionally, the specified "rock mulch/rock ground cover" is not listed in Appendix A as an acceptable ground cover. The applicant should discuss this with the Township. (Previous Comment 69) A waiver has been requested to permit the use of the rock mulch. The justification states, "Rock mulch is provided as an attractive and maintainable accent to vegetated ground cover." (Previous Comment 69) This waiver was recommended by the Planning Commission on March 10, 2025.*

70.-72. Previous Comments 70-72 satisfied.

73. Per Section 390-55.D.(1)(a), "Street trees shall be required along all existing streets abutting or within the proposed subdivision or land development." *Street trees are required along Back Mountain Road. (Previous Comment 73) Per Section 390-55.D.(2), "Waiver for existing vegetation. The street tree requirement may be waived by the Township where existing vegetation is considered sufficient to provide effective screening and to maintain scenic views of open space, natural features, or other valued features." Since the response letter states, "Street trees will be provided in open areas per the Ordinance where Back Mountain Road does not border existing wooded areas.", a waiver request to maintain existing vegetation should be submitted by the applicant. (Previous Comment 73) This waiver was recommended by the Planning Commission on March 10, 2025.*

74. Previous Comment 74 satisfied.

75. Per Section 390-55.E.(3), "Basin grades. Minimum grades inside stormwater basins shall be 1% unless infiltration is an integral part of the design; and maximum side slopes of the basin shall be 33% (3:1 slope)." *The proposed basins show interior side slope grades of 3:1 (33%), exterior side slopes of 2:1 (50%), and flat bottoms. A waiver request has been submitted to permit steeper side slopes with erosion control matting and a flat bottom to provide for infiltration and evapotranspiration. In part, the justification states that erosion control matting will be provided and the stability of the slopes will*



be documented in a geotechnical report. The submitted geotechnical report indicates that slopes greater than 3H:1V will require additional engineering evaluation. The “additional engineering evaluation” supporting the waiver request must be provided. (Previous Comment 75) A waiver has been requested to permit the basin bottoms to be flat and for the side slopes to exceed 3:1 slopes. The justification states, “The stormwater facilities propose both infiltration and evapotranspiration (ET) to manage the volume and water quality increase based upon onsite soils testing. The proposed facilities are graded with a flat bottom slope to maximize storage, infiltration and ET volumes to meet the permit requirements. Therefore, we are requesting a waiver to allow flat bottom basins at 0% slope. The NPDES standards provide for grading to be stabilized with vegetation up to slopes to 2 horizontal to 1 vertical (2:1). Slopes 3:1 and over require erosion control matting to aid in the establishment of vegetation. To minimize the impact to existing vegetated area we are requesting to grade proposed slopes to a (2:1) slope using the required erosion control matting to establish the vegetation or provide another stable surface. The stability of these slopes are documented in the geotechnical report prepared for the site.” We have no objection to the requested waiver. (Previous Comment 75) **This waiver was recommended by the Planning Commission on March 10, 2025.**

76. 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 buffer area. (Previous Comment 76) The buffer tabulation that has been added to the plans is only for 300 feet along the Lands N/F Donna L. Ran. The placement of the buffer planting is mostly along Detention Basin 1 with only a few trees along the proposed Maintenance Building. We recommend the plantings be adjusted to provide more screening of the building. (Previous Comment 76) The tabulation for the buffer along Lands N/F Ran indicates 17 evergreen trees, but the plan only depicts 10 evergreen trees. This discrepancy shall be resolved.*
77. Previous Comment 77 satisfied.
78. 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 detention basins and the sewage pump station. (Previous Comment 78) The required site element screen has been added for the sewage pump station. A Screen Type No. 6 must also be added to the Dry Extended Detention Basin 1 along the side near the Lands N/F Donna L. Ran as it is within 100 feet of the property line. This screen may be combined with the required buffer plantings. (Previous Comment 78) A waiver request was submitted to allow the vegetation portion of Screen Type No. 6 without the screening berm due to its proximity to the basin berm. This waiver was recommended by the Planning Commission on March 10, 2025.*
79. Previous Comment 79 satisfied.
80. 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. (Previous Comment 80) The response letter states, “The landscape plan has been designed by O2, a qualified landscape architect from Calgary, Canada with input from Primrose*



Landscape Company and RKR Hess. This well qualified team has developed a specific design for a landscape plan that meets the needs of this site and project scope. We request the design team be accepted by the Township." No supporting information has been provided to demonstrate their knowledge of the Pennsylvania climate, environment, and habitat. (Previous Comment 80)

81.-83. Previous Comments 81-83 satisfied.

84. In accordance with Section 390-55.1.(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. (Previous Comment 84) The response letter acknowledges this requirement. (Previous Comment 84) The response letter states, "The detailed cost estimate will be submitted separately."*

85.-86. Previous Comments 85-86 satisfied.

87. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:

- A. Section 390-58.3B.(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 \$27,286.00 (19.49 disturbed acres * \$1,400.00). (Previous Comment 87) A waiver has been requested to Sections 390-58.B(1), 390-58.C(1), 390-59.F, and 390-59.K with respect to the open space and fee in-lieu requirements. The justification states, "The proposed project will provide a positive tax benefit to the Township, County and State. The project provides recreation and service to residents and guests of the community. The project does not provide new housing units that will increase the number of residents in the Township and impact the use and demand of existing open space facilities. Based on the specific characteristics of this project, a waiver request of the requirement to provide open space or a fee in lieu of open space is requested." The Board of Commissioners must make this determination. (Previous Comment 87) The disturbance is now listed to be 20.49 acres; therefore, the associated fee in-lieu would be \$28,686.00 (20.49 disturbed acres * \$1,400.00). The Board of Commissioners must make a determination on this waiver request.*



88. In accordance with Section 390-59.B., "Parking spaces and aisles. Parking space and aisle dimensions shall be no less than those listed in the following table". *Parking spaces are required to be a minimum of 10'x18' per this section. It is noted that the plan reflects 9'x18' spaces as defined in the Zoning Ordinance. A waiver has been requested to allow the space dimensions per the Zoning Ordinance. (Previous Comment 88) We have no objection to the requested waiver. (Previous Comment 88) This waiver was recommended by the Planning Commission on March 10, 2025.*

89. Previous Comment 89 satisfied.

SANITARY SEWER AND PUMP STATION COMMENTS

90.-95. Previous Comments 90-95 satisfied.

96. The backwash of the pool system is reported to be 5,600 gpd. The peak rate of the backwash must be determined and demonstrated that it does not overwhelm the connected pump station. Further, pool backwash is known to have a much stronger waste than traditional sewage. The organic loading capacity of the WWTP, both in total daily load and concentration, must be analyzed to demonstrate it can handle the proposed combined waste. *(Previous Comment 96) The response letter indicates that additional information and verification will be provided in a future submission. We would also accept this information as a shop drawing prior to construction. (Previous Comment 96) The response letter states, "This coordination is appropriate as a shop drawing review as a condition of approval." A note requiring the shop drawing submittal shall be added to the plans.*

97.-100. Previous Comments 97-100 satisfied.

101. The construction details of the proposed grease trap must be provided. *(Previous Comment 101) The response letter states, "The proposed grease trap detail will be provided in a future submission. We are coordinating with the Owner's MEP who will be providing the design for the grease trap." (Previous Comment 101) The response letter states, "This coordination is appropriate as a shop drawing review as a condition of approval." A note requiring the shop drawing submittal shall be added to the plans. The grease trap may also require a permit.*

102. The force main crosses under Scot Run, a regulated water course. A Chapter 105 stream encroachment permit is required for this crossing. *(Previous Comment 102) The response letter states, "A Chapter 105 stream encroachment permit application has been submitted for this crossing and the application has been accepted as complete by DEP." (Previous Comment 102)*

103.-109. Previous Comments 103-109 satisfied.

110. Lot 2 (this project) and Lot 3 are separate legal parcels. An easement on Lot 3, to benefit Lot 2, must be provided to allow for the installation and future maintenance of the force mains. *(Previous Comment 110) Proposed sewer easements have been added to Sheet C.S.01. Executed easement agreements shall be provided to the Township prior to final plan approvals. (Previous Comment 110) The response letter states, "Proposed sewer easements have been indicated on the plan. The grant of the easements will be required based on the as-built of the project confirming the location of the forcemain, prior to issuance of an occupancy permit for the project."*



111. An easement through the Brookdale Resort property for the connection and future maintenance of the force main to the existing Wastewater Treatment Facility must be provided. *(Previous Comment 111) A proposed easement has been added to Sheet C.S.01. Executed easement agreements shall be provided to the Township prior to final plan approvals. (Previous Comment 111) The response letter states, "The properties are all controlled by the same owners. We request the easements be required after the construction of the sewer forcemain prior to the issuance of an occupancy permit."*
112. Notation shall be added to the Site Plan stating the ownership and maintenance responsibilities of the force main and sewage pump station and the requirement for an operational plan to be prepared which includes the operation and maintenance responsibilities, schedules, and emergency contacts. This shall be provided to the Township prior to issuance of a Certificate of Occupancy. *(Previous Comment 112) The notation has been added. The O&M Plan shall be provided to the Township prior to issuance of a Certificate of Occupancy. (Previous Comment 112) The response letter states, "Note 10 has been added to the plan confirming the Property Owner is owner of the sewage pump station on the site and the force main to the WWTP. The requirement to provide the O&M Plan prior for the pump station and force main is an appropriate condition of Land Development Approval."*
113. Copies of agreements allowing for the connection to and treatment of sewage through the existing Brookdale Resort Wastewater Treatment Facility for this project must be provided to the Township. *(Previous Comment 113) The response letter acknowledges the requirement. (Previous Comment 113)*
- 114.-122. Previous Comments 114-122 satisfied.

WATER COMMENTS

123. The plans identify a water treatment, storage, and pump system within the maintenance building. Information related to this treatment must be provided to the Township for review. *(Previous Comment 123) The response letter states, "The details of the water supply system and fire protection system are under design and will be provided to the Township in future submission." (Previous Comment 123)*
124. The location of the water storage tank to provide fire protection services must be shown. *(Previous Comment 124) The response letter states, "The details of the water supply system and fire protection system are under design and will be provided to the Township in future submission." (Previous Comment 124)*
- 125.-126. Previous Comments 125-126 satisfied.
127. The project will require a water supply permit under PA Code, Title 25, Chapter 109. *(Previous Comment 127) The response letter states, "A public water supply permit application will be submitted upon completion of hydrogeological investigation and design." (Previous Comment 127)*
- 128.-130. Previous Comment 128-130 satisfied.

MISCELLANEOUS COMMENTS

- 131.-150. Previous Comments 131-150 satisfied.



151. The dimension of the fire truck used for the turning movement plan Sheet C.FL.01 shall be depicted on the plan. *(New Comment) (Previous Comment 151) The dimensions must still be added to the plan.*
152. The driveway stationing is missing from Sheet C.S.02 and must be added. *(New Comment)*
153. The buffer tabulation on Sheet C.L.02 incorrectly identifies the direction of the property lines. The table should be corrected so that Lands N/F Ran are on the “western” side property line Lands N/F Larson/Davison are on the “eastern” side property line. *(New Comment)*

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development and Subdivision Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

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

Sincerely,

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

JST/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Brookdale Enterprises, LLC – Applicant
Nate Oiler, P.E. – RKR Hess, a division of UTRS, Inc.
Kristina Heaney – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates



YOUR GOALS. OUR MISSION.

May 1, 2025

Pocono Township Planning Commission
112 Township Drive
Tannersville, PA 18372

**SUBJECT: MOUNTAIN EDGE VILLAGE COMMUNITY TOWNHOUSE UNITS 57A-H
PRELIMINARY/FINAL LAND DEVELOPMENT REVIEW NO. 1
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA
POCONO TOWNSHIP LDP NO. 1445, T&M PROJECT NO. POCO-R1180**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a review of the Preliminary/Final Land Development Plan Application for Mountain Edge Village Community Townhouse Units 57A-H. The submitted information consists of the following items.

- Pocono Township Land Development Application.
- Modification Request Letter prepared by D&D Engineering and General Construction, LLC, dated March 31, 2025.
- Deed-in-Lieu of Foreclosure dated September 8, 2015.
- Deed of Confirmation dated March 17, 2008.
- Letter from Mountain Edge Village POA dated March 24, 2025.
- Letter from Coastal Environmental, Inc. dated March 24, 2025.
- PNDI receipt dated March 26, 2025.
- "E&SPC & PSCM Report/Narrative" prepared by D&D Engineering and General Construction, LLC, dated January 2, 2025.
- Boundary Survey Map of Ski Side Village prepared by Brian D. Courtright, P.L.S., 1 sheet, dated December 5, 2023.
- Land Development Plan for Mountain Edge Village Community Townhouse Units 57A-H prepared by D&D Engineering and General Construction, LLC, 13 sheets, dated January 2, 2025.

BACKGROUND INFORMATION

The Applicant, Percudani House III, L.P., has submitted a plan proposing an 8-unit townhouse building at the end of Ski Side Lane located within Mountain's Edge at Camelback. The property is located within the RD, Recreation, Zoning District and consists of two parcels (Tax ID No. 12/10B2.1/1 and 12/117167). The overall property has an area of 65.25 acres and contains numerous existing townhouse buildings, parking areas, outdoor amenities (pool, basketball court, tennis court), access roads, a sewage pump station, and a sewage treatment plant. The site also has wetlands, ponds, wooded areas, steep slopes, the Pocono Creek watercourse, and an unnamed tributary to the Pocono Creek. The site is currently served by private centralized water and sewer.



The project proposes a new 8-unit townhouse building, new parking areas to serve the new building as well as existing Units 45-48, and a new infiltration/retention berm for stormwater management. The building is in accordance with the originally approved Mountain Edge Village Planned Community. The project was a previously approved land development called "Ski Side Village" with a total of 57 townhouse units approved in November 1986. Per the application information, the proposed project will bring the site to a total of 56 townhouse units.

The project site is located within the B-2 Stormwater Management District of the Brodhead-McMichaels Watershed. The receiving water is the Pocono Creek, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).

Based upon our review of the above information, we offer the following comments and/or recommendations related to the proposed development.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Waivers in Comments 1 and 35 have been requested.

1. In accordance with Section 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." *The design engineer has requested a waiver to this requirement. The justification states, "An overall boundary was plotted for the land development from a plan prepared by Brian D. Courtright, P.L.S., and the project area location coordinated from the overall boundary. It is requested that an overall boundary survey is not required with boundary closure reports since the proposed improvements are located over 300-feet from the closest part of the boundary."*
2. In accordance with Section 390-29.F, Site context map. "A map compiled from existing information showing the location of the proposed major subdivision within its neighborhood context shall be submitted. For sites under 100 acres in area, such maps shall show the relationship of the subject property to natural and man-made features existing within 1,000 feet of the site. For sites of 100 acres or more, the map shall show the above relationships within 2,000 feet of the site. The features that shall be shown on site context maps include topography (from USGS maps), stream valleys, wetland complexes (from maps published by the United States Fish and Wildlife Service or the USDA Natural Resources Conservation Service), woodlands over 1/2 acre in area (from aerial photographs), ridgelines, public roads and trails, utility easements and rights-of-way, public land, and land protected under conservation easements." *The Site Context Map shall be prepared and submitted in accordance with the requirements of this Section. It is suggested that an aerial may be utilized and supplemented with the required additional information within 1,000 feet of the site.*
3. In accordance with Section 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.*

4. In accordance with Section 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.*
5. Per Section 390-29.I.(16), the improvements plan shall include a signature block for the Township Engineer. *The following signature block for the Pocono Township Engineer shall be provided on the plan.*

Pocono Township Engineer

Date

6. Per Section and 390-29.I.(27), the improvements plan shall include the “Names of present adjoining property owners and the names of all adjoining subdivisions, if any, including property owners and/or subdivisions across adjacent roads, along with the current Tax Map number for each property shown.” *The required information for the ownership of the existing units within the project site shall be provided on the plan.*
7. Per Section 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.*
8. Per Section 390-29.J.(2), “Exterior elevations of any proposed buildings including at least the front and side elevations.” *Architectural renderings of the front and side elevations of the proposed building shall be submitted.*
9. In accordance with Section 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 a current title search report.*
10. In accordance with Section 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), “Copies of all other required permits or the applications made therefor.” *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. *Pocono Township Fire Department*



11. 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 Recorder 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 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.

12. 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." *Sheet 3 currently shows steep slopes over 25%. Steep slopes are defined as being 20% or greater and shall be identified on the plan accordingly. Additionally, any applicable restrictions and requirements of this section shall be addressed.*
13. 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.*
14. 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.*
15. In accordance with Section 390-46.D., resource conservation standards include "Protection of topsoil." *The protection of topsoil in accordance with this section shall be addressed on the plans.*
16. 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." *Sidewalks may be required along Camelback Road.*

17. 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." *While the Boundary Survey Map shows the majority of the outbound monumented, the property line along Camelback Road, in Pocono Creek, and two corners near "The Chateau", require monuments to be set.*
18. Per Section 390-50.D.(5), "Embankment slope. The maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical." *The proposed slopes of the basin berm are shown at 3:1 which exceeds this ordinance requirement.*
19. Per Section 390-50.D.(7), "Top width. The minimum top width of the detention basin berm shall be 10 feet." *The top width of the detention basin berm shall be dimensioned. It appears to be less than the required 10 feet.*
20. Per Section 390-50.D.(8), "Minimum. In order to ensure proper drainage on the basin bottom, a minimum grade of 2% shall be maintained for areas of sheet flow." *The basin appears to be flat across its bottom due to its design for infiltration. If requested, we would support a waiver to this requirement since a flat bottom is required for infiltration.*
21. In accordance with Section 390-50.D.(11)(c), "Emergency spillways shall be constructed of reinforced concrete or other material approved by the Township Engineer." *The plans currently specify the use of NAG75 material with vegetation, which would require a waiver. We would support the use of this appropriate material in this situation.*
22. In accordance with Section 390-50.D.(15), "Embankment placement. All detention/retention basin embankments shall be placed in a maximum of eight-inch lifts compacted to a minimum of 95% of modified proctor density, as established by ASTM D-1557. Prior to proceeding to the next lift, the compaction shall be checked by the Township Engineer or a certified soils engineer. Compaction tests shall be run on the leading and trailing edge of the berm along with the top of berm." *A note regarding these requirements shall be added to the plans.*
23. In accordance with Section 390-50.D.(17), "Cutoff trench. A cutoff trench (keyway) of impervious material shall be provided under all embankments that require fill material. The cutoff trench shall be a minimum of eight feet wide, two feet deep and have side slopes of one-to-one." *The required cutoff trench shall be added to the embankment details.*
24. Per Section 390-52.A.(2), Water supply and sewage disposal. "Three copies of all correspondence, supporting documentation, applications for permits and certificates for operation submitted to the Pennsylvania Department of Environmental Protection and/or the Pennsylvania Public Utilities Commission for the right to provide such services shall be forwarded to the Township as a part of the public record. One copy of the permit and/or certificate of convenience issued by the Pennsylvania Department of Environmental Protection and/or the Pennsylvania Public Utilities



Commission authorizing such services shall be forwarded upon receipt to the Township as a part of the public record.” *Copies of the permits for the existing centralized water supply and sewage disposal facilities shall be provided to the Township. Additionally, the Developer’s Agreement shall require that copies of the monthly reporting sent to PADEP also be provided to the Township simultaneously.*

25. 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 with respect to the new connection shall be provided to the Township. Existing and proposed fire hydrants shall also be shown on the plans.*
26. 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.*
27. Per Section 390-55.C.(2)(a), “One planting island shall be provided for every 10 parking stalls.” *One (1) planting island is required for the northern parking lot.*
28. 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.*
29. In accordance with Section 390-55.I.(2)(a), The final landscape plans shall show the “Location of all outside storage and trash receptacle areas.” *These items must be added to the plans.*
30. 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 at the time of final plan approval.*
31. In accordance with the Section 390-58 Common Open Space, Recreation Areas, and In-Lieu Fees:
 - A. Section 390-58.3B.(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.

STORMWATER MANAGEMENT ORDINANCE COMMENTS

- 32. In accordance with Section 365-8.L., "Roof drains should not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment." *The plans reflect an "option" for the roof drains for the proposed buildings to either discharge to the ground or connect into an inlet. If they are to be connected to the storm sewer, a waiver would be required and the plan would need to clearly depict the extent of the proposed connection(s).*
- 33. In accordance with Section 365-8.M, "all stormwater runoff, other than rooftop runoff discussed in Subsection L above, shall be treated for water quality prior to discharge to surface or groundwater." Also, in accordance with Section 365-10.C, "For areas within defined special protection subwatersheds which includes exceptional value (EV) and high quality (HQ) waters, the temperature and quality of water and streams shall be maintained through the use of temperature sensitive BMPs and stormwater conveyance systems." *The plans must show the required water quality treatment/pretreatment in accordance with this Section.*
- 34. Per Section 365-10.I.(8)(a), "Stream buffer delineation. A fifty-foot buffer, measured perpendicular to and horizontally from the top-of-bank on all sides of any stream, shall be maintained on all sides of any stream, with the exception of the Pocono Creek, where the buffer shall be 75 feet, measured perpendicular to and horizontally from the top-of-bank on all sides of the Pocono Creek. In addition, where the 100 feet of land adjacent to the edge of a stream has an average upland slope greater than 5%, the minimum buffer width shall be increased by four feet for each percent of slope at or above 5%, subject to a maximum cumulative buffer of 100 feet." *The calculation for the determination of the depicted 75-foot stream buffer must be provided. The upland slope of the unnamed tributary to Pocono Creek has an average greater than 5%.*
- 35. In accordance with Section 365-12.A.(1), "Standards for managing runoff from each subarea in the Brodhead/McMichael Watershed for design storms are shown in Table 365-12. Development sites located in each of the A, B or C Districts must control proposed conditions runoff rates to existing conditions runoff rates for the design storms in accordance with Table 365-12." *The design engineer has requested a waiver to this requirement. The justification states, "Post-development runoff has been reduced to below pre-development. Due to the small size of*



disturbance and the A soils, there is a negligible increase of 0.3 cfs for the 50- year storm and 0.2 cfs for the 25-year storm reductions."

36. In accordance with Section 365-13.B, "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 A^{III} of this chapter. If a hydrologic computer model such as PSRM or HEC-1 is used for stormwater runoff calculations, then the duration of rainfall shall be 24 hours. The NRCS "S" curve shown in Figure B-1, Appendix A of this chapter, shall be used for the rainfall distribution." *The Stormwater Management Report utilizes rainfall values from NOAA Atlas 14, Volume 2, Version 3, location Tannersville, PA". We have no objection to the Applicant requesting a waiver from this Section to utilize the rainfall data from NOAA.*
37. Per Section 365-19., "The stormwater management site plan shall consist of a general description of the project, including sequencing items described in § 365-10, calculations, maps, plans and a consumptive use tracking report. A note on the maps shall refer to the associated computations and erosion and sediment control plan by title and date. The cover sheet of the computations and erosion and sediment control plan shall refer to the associated maps by title and date. All stormwater management site plan materials shall be submitted to the municipality in a format that is clear, concise, legible, neat, and well organized, in the opinion of the municipality; otherwise, the stormwater management site plan shall not be accepted for review and shall be returned to the applicant. The following items shall be included in the stormwater management site plan:" *The Stormwater Management Site Plan shall contain a note referencing the Post-Construction Stormwater Management Report with date and subsequent revision dates.*
38. Per Section 365-19.B.(8), the stormwater site plan shall contain "Limits of earth disturbance, including the type and amount of impervious area that would be added." *The required impervious area information shall be provided on the Stormwater Site Plan for this project.*
39. In accordance with Section 365-19.B.(14), "The total tract boundary and size with accurate distances to hundreds of a foot and bearings to the nearest second." *This information shall be provided on the Stormwater Site Plan.*
40. In accordance with Section 365-19.B.(23), the plans shall include "The following signature block for the design engineer (Pennsylvania-licensed professional engineer):

"I, (Design Engineer), on this date (date of signature), hereby certify that the Stormwater Management Site Plan meets all design standards and criteria of the Pocono Township Stormwater Management Ordinance. The word 'certify' is an expression of professional opinion by the undersigned and does not constitute a guarantee or warranty."

This statement, as written, shall be added to the Cover Sheet with the other acknowledgements.
41. In accordance with Section 365-27.A., "For subdivisions and land developments, the applicant shall provide a performance guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved stormwater management site plan in the amount and method of payment provided for in Chapter 390,



Subdivision and Land Development.” *A construction cost estimate for the stormwater management facilities shall be provided to the Township to determine the amount to be required for the performance guarantee. The performance guarantee shall be provided to the Township.*

42. In accordance with Section 365-27.C., “At the completion of the project, and as a prerequisite for the release of the performance guarantee, the applicant or his representatives shall:

- 1) Provide a certification of completion from a Pennsylvania-licensed professional engineer, verifying that all required stormwater management facilities have been constructed according to the plans and specifications and approved revisions thereto as follows:

“I (Design Engineer), on this date (date of signature) hereby certify that the stormwater management facilities have all been installed in accordance with the approved Stormwater Management Site Plan for (name of project) and in compliance with the design standards and requirements of the Ordinance.”

- 2) Provide a set of record drawings with a certification from the contractor on the record drawings that states:

“I, (insert signer's name), state that I am the (insert position) of (insert name of contractor) on this date (date of signature), hereby certify (1) that I am duly authorized to make this certification of behalf of (insert name of contractor), and (2) that all stormwater management facilities have been constructed according to the approved plans and specifications and approved revisions thereto.””

The certification and drawings shall be prepared and provided as required by this Section. Note 17 on the Cover Sheet shall be revised to reference the requirements of this Section.

43. In accordance with Section 365-29., “Prior to approval of the site's stormwater management site plan, the applicant shall sign and record a maintenance agreement in form and substance satisfactory to the Board of Commissioners, covering all stormwater control facilities that are to be privately owned.” *This shall be completed prior to recordation and as required by this Section.*

MISCELLANEOUS COMMENTS

44. The Township Land Development Plan (LDP) No. 1445 shall be placed in the lower right-hand corner of all plan sheets and provided on all subsequently submitted documents.

45. The List of Drawings on the Cover Sheet shall identify the plans to be recorded including which sheets will be considered as the PCSM plans.

46. Note 13 on the Cover Sheet references a wetland delineation. A copy of the report shall be provided to the Township.

47. Note 19 on the Cover Sheet references accessibility for a fire truck. The turning template for the fire truck must be provided for review.



48. The names of the access roads must be labeled on Sheet 2.
49. The angle of the storm pipe from Inlet #3 to Inlet #2 shall be revised to be 90 degrees. It may be less only if the flow into the inlet from this pipe is in line with the flow out of Inlet #2.
50. Sidewalk connections shall be provided from the 8-space parking area to Units #45-#48.
51. Grading ties shall be provided for the existing stairways from the parking lot to the existing building.
52. The grade at the existing transformer is proposed to be reduced by over 1-foot. A note shall be added to the plan that the grading shall be coordinated with the utility company.
53. In order to maximize the infiltration area of the stormwater facility, we recommend the design engineer reduce the lengths of the storm pipes (e.g., pull the discharge points back into the slope), and revise the 1293 and 1294 contours be at a 3:1 slope from the 1295 contour on all sides.
54. A detail shall be provided on the plans that clearly depicts the configuration of the two (2) spillways on the basin berm as well as their different elevations.
55. The total earth disturbance on Sheet 6 is listed as 0.91 acres; however, the report lists the disturbance as 0.92 acres. The discrepancy shall be resolved.
56. The introduction to the Sequence of Construction Activities on Sheet 6 references the County Conservation District. If the plans are not being reviewed by MCCD, then the references shall be removed.
57. The location of the topsoil stockpile shall be shown on Sheet 6.
58. The location of the concrete washout shall be shown in plan view. Additionally, its placement shall be included in the Construction Sequence.
59. The Construction Sequence on Sheet 6 must clearly address access to the site by occupants of existing Units 45-48.
60. The Tree Planting List on Sheet 7 includes "White Ash". Due to the threatened status of this species because of the Emerald Ash Borer invasion, Ash shall be removed from the list.
61. References to the Conservation District on Sheets 8 and 11 shall be clarified and/or removed.
62. The mowing frequency for the "meadow" vegetation shall be specifically addressed in the BMP maintenance notes on Sheet 11. Also, any requirement for picking up mowing clippings from the interior of the infiltration basin shall be addressed.
63. The length of the parking stall in the detail on Sheet 12 is inconsistent with the plans and shall be corrected.



64. The storm pipes must be shown on the profiles on Sheet 13. Any utility crossings must also be depicted.
65. "Post-Development Area #1 – Bypass" in the summarized report calculations contains a line that states "Meadow-Type C soils". Since there do not appear to be any Type C soils, this shall be corrected.
66. "Pre-Development – Disturbed Area" calculations in the report have no runoff rates indicated. The information shall be completed.

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments. If you should have any questions, please call me.

Sincerely,

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

JST/arm

cc: Jerrod Belvin – Pocono Township Manager
Lindsay Scerbo – Zoning Officer
Leo DeVito, Esq. – Township Solicitor
Lisa Pereira, Esq. – Broughal & DeVito, LLP
Percudani House III, L.P. – Applicant
Deanna L. Schmoyer, P.E. – D&D Engineering & General Construction, LLC
Kristina Heaney – Monroe County Conservation District
Amy R. Montgomery, P.E. – T&M Associates
Melissa E. Hutchison, P.E. – T&M Associates