Pennsylvania
Department of
Environmental Protection

June 16, 2025

Charlie Gauthier
Quaker Valley School District
100 Leetsdale Industrial Drive
Leetsdale, PA, 15056
Email: gauthierc@qvsd.org

Re: DEP FILE E0205225-004
Technical Deficiency Letter
New High School Campus
Leet Township, Leetsdale & Edgeworth Boroughs
Allegheny County

Dear Charlie Gauthier:

The Department of Environmental Protection (DEP) reviewed the above referenced application package and has identified the following significant technical deficiencies. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's preferred means of satisfying the applicable regulatory requirements.

Pursuant to 25 Pa. Code §105.13(e)(4) of DEP's Chapter 105 Rules and Regulations you must submit a response fully addressing each of the significant technical deficiencies set forth below. Please note that this information must be received within sixty (60) calendar days from the date of this letter, on or before August 15, 2025, or DEP may consider the application to be withdrawn by the applicant.

You may request a time extension, in writing, before August 15, 2025 to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code §105.13(e)(4).

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be withdrawn or denied.

The PAyback program amends the former Permit Decision Guarantee program. Executive Order 2023-07 requires the Department to abide by established review times for each authorization. The PAyback

program became effective November 1, 2023, as required by Executive Order 2023-07. Chapter 105 applications or registrations received by the Department on or after that date are subject to this policy and are potentially eligible for Pennsylvania's PAyback program. More information is available on the PAyback website.

Should you have any questions related to the engineering comments, please contact Andrew Kearny at **412.442.4223** or andkearney@pa.gov. For questions related to the environmental comments, please contact Tristan Robert at **412.442.4072** or trrobert@pa.gov. Please refer to Application No. **E0205225-004** Authorization No. 1514076 to discuss your concerns or to schedule a meeting. You may also follow your application review process via *eFACTS on the Web* at: http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx.

Sincerely,

Dana Drake

Dana Drake, P.E.
Environmental Program Manager
Waterways & Wetlands Program

Enclosure(s)

cc: Martha Frech, mfrech@streamlineengineering.net
Allegheny County Conservation District
US Army Corps of Engineers
PA Fish & Boat Commission
Leet Twp,
Leetsdale Boro,
Edgeworth Boro,
DEP File No. E0205225-004

DEP FILE NO. E0205225-004

PLEASE ENCLOSE A DIGITAL COPY OF THIS LETTER WHEN SUBMITTING THE REQUESTED INFORMATION

All requested information below must be provided electronically through *ePermitting and Public Upload with Electronic Payment*. Please use the link below to view the webpage, get instructions, and submit documents as we are no longer accepting paper copies. Additionally, submit the dated revisions as an entire section so that we can exchange individual sections with the original submission. The revisions should be in a searchable format. Please submit as a new submission and choose "fee exempt" if additional fees are not being submitted.

https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx

Engineering Comments

1. §105.261(3): A calculation sheet is provided which attempts to demonstrate that the 100-yr flows of UNT-1 and UNT-2 are contained to the stream channels and thus that the Chapter 105 regulatory floodway would also be contained to the stream channels. However, what has been submitted is insufficient to demonstrate that the flows will be contained within the channels throughout the length that they run through the project site. The following comments discuss the issues with the analysis in further detail. If the issues presented in the following comments cannot be addressed, then an assumed 50' regulatory floodway should be utilized. This would likely lead to a large amount of additional aquatic resource impacts and require the submission of a revised Aquatic Resources Impact Table (ARIT), site drawings showing the updated floodway, revised project narrative, etc. to evaluate the additional impacts.

2. §105.261(4): In order to calculate the hydraulic capacities of the stream channels, numerous assumptions were made about the physical attributes of the channels (bottom width, side slope, channel height, channel slope, etc.). To verify these assumptions, provide cross sections of the stream channels which were created using field data from the site.

3. §105.261(4): It is likely that the actual cross sections generated from field data do not form a uniform trapezoidal channel as was used in the analysis. Because of this, it is highly recommended that a modelling software such as HEC-RAS or Hydraflow Express be used to analyze the hydraulic capacities of the irregular channels.

4. §105.261(4): Only three locations were used to calculate the hydraulic capacities of the stream channels (2 of which assumed nearly identical channel dimensions). The physical makeup of the stream channels on the site varies drastically and these assumptions are very likely not representative of the channels throughout the entire site (for example, there may be some areas where one or both stream banks are laid way back). In order to evaluate the hydraulic capacity of the stream channels the entire length of the site, a large number of locations spanning the entire length of the channels within the site should be used in the analysis. As mentioned in the comment above, cross sections of the stream channels at these locations should also be provided to verify assumed channel characteristics.

5. §105.261(3): It is assumed that a form of the Manning's equation was used to calculate the predicted bankfull flows. If manual calculations are still used for this analysis, please show the equation on the calculation sheet to confirm this.

6. §105.261(3): There is a proposed wall and associated grading to support the pedestrian walkway along UNT 2 on the south end of the project. Based on the existing contours, it does not appear that

the stream would be confined to the channel delineated on the drawings. Please provide additional documentation which demonstrates that the stream channel is confined to what is shown on the plans at this location. It may be helpful to provide cross sections for this part of the stream which also shows the proposed wall and grading. If it cannot be demonstrated that the stream here is confined to the channel during the 100-yr storm flows, this wall and the proposed grading would be considered an aquatic resource impact. Additionally, because the wall and proposed grading would be constricting the channel, an H&H analysis will need to be done to evaluate the flood heights and flow velocities in this section.

7. §105.161(a)(3): It is noted that proposed culverts 1, 2, and 5 are not being embedded. Since the drainage areas for these culvers are less than 100 acres, the culverts should be embedded 6" into the streambed. If the culverts will not be embedded, demonstrate and/or explain how stream flow undermining the culvert will be prevented and how aquatic organism passage will be maintained.

8. §105.13(e)(1)(i)(B): The delineated drainage areas for the culverts in the H&H report include areas with no contour data in the provided drainage area maps. Provide the contour data for the entirety of the delineated drainage areas so that the accuracy of the drainage areas can be verified. Additionally, discuss how these drainage areas were delineated without the complete contour data.

9. §105.13(e)(1)(i)(C): Please remove the pre development contours from the post development drainage area map so that the drainage areas and time of concentration pathways can be verified.

10. §105.13(e)(1)(i)(C): The TC flow path for the post development Culvert 1 DA may incorrectly identify the flow segments. Based on the flow path drawn, following the first 200' on the proposed grass field area, the flow path will follow a storm pipe until it discharges to proposed drainage channel #3. Discuss if this should all be considered pipe flow and revise the calculations as necessary.

11. §105.161(d): While the TC paths are shown on the DA maps, it does not appear the actual TC calculations were included in the H&H report. Please provide these calculations such that the inputs used in the Hydraflow model can be verified.

12. §105.161(d): Demonstrate how the CN values input into Hydraflow were obtained for each of the drainage areas analyzed in the H&H report.

13. §105.161(b): Hydrographs 6 in the model is named PostDev Culvert 5 to SWMF1. Should this be named PostDev Culvert 2 to SWMF1 instead? If so, please revise for clarity.

14. §105.161(a)(1): According to the HY-8 model, the max headwater elevation at Culvert 5 during the 100-yr event is 848.18'. Based on the UNT-2 Profile on the drawings, this puts the water surface elevation just above the height of the proposed headwall and well over the height of the proposed wing walls. This could lead to erosion of the embankment behind the headwalls and wingwalls which may destabilize the structure and/or the roadway over time. Evaluate the possibilities of utilizing a larger culvert to reduce the max head elevation or providing some sort of additional stabilization to the embankment to prevent erosion from occurring.

15. §105.13(e)(1)(i)(C): The plan proposes to replace two existing storm pipes at the headwaters of UNT-1 where the stream crosses under Camp Meeting Road. The two existing storm pipes are an 18” and a 24” pipe which are connected by an existing inlet. Provide more information on the replacement structures. Will the replacement pipes be the same length as the existing ones? Will the replacement pipes have different inlet, outlet elevations, or slopes? How will the replacement pipes be connected?

16. §105.13(e)(1)(i)(C): Based on the proposed storm drain design table, the pipe runs from E7-E8 and E8 to the 24” outfall are set to be 30” pipes. Are these the replacement pipes mentioned in the comment above? If so, the plan drawing (Sheet B104) should be revised to call for both to be replaced with 30” pipes as depicted in the calculations. Additionally, ensure that the proposed invert, outlet elevations, and pipe lengths are accurately depicted on the UNT-1 stream profile as these should all match the information on the proposes storm drain design table.

17. §105.151(3): Show and/or explain how the water surface elevations and velocities for the existing conditions at the locations of Culverts 1, 2, and 5 were calculated as identified in the tables of Section 6 of the H&H narrative. These do not seem to match what was calculated on the “Calculate Flow Properties in UNT-1 and UNT-2 – Existing Conditions” table in the Calculation Sheet.

18. §105.161(e): In the risk assessment, please discuss the calculated increases to both flow velocity and WSEL from existing to proposed conditions at the culvert locations. In this discussion, please explain in detail why the increase in WSEL will not increase the risk of flooding and explain how the increased flow velocities will be managed to prevent erosion from occurring.

19. §105.13(e)(1)(i)(G): Show the proposed Sanitary Line at crossing 3 on the UNT-1 profile on the drawings.

20. §105.13(e)(1)(i)(B): Please label the existing sanitary line stream crossings where the existing line will be removed and/or abandoned on the UNT-1 and UNT-2 Existing Site Plan (Sheet B102). Note that these crossings where the line will be removed and/or abandoned should also be identified as impacts on the Aquatic Resource Impact Table.

21. §105.13(e)(1)(i)(B): It is not clear based on the drawings what work is being done regarding the gas line for this project. Please revise the line type/weight for the proposed gas line to clearly show what is being installed and ensure that the section of existing gas line which is being removed and/or abandoned is clearly shown and labeled.

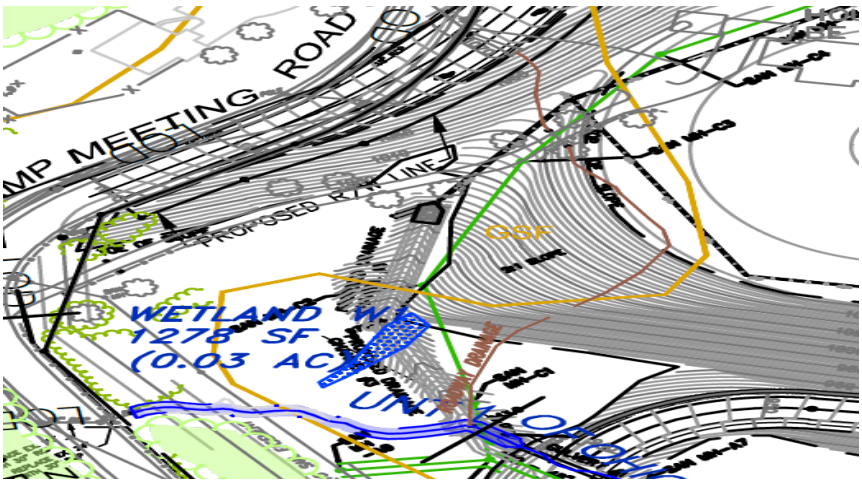
22. §105.301(10): Based on the drawings, Outfall 5 is a stormwater outfall located at the outlet end of Culvert 5. Provide more information on this outfall configuration. Will the stormwater pipe discharge through a hole in the culvert end wall? Is Outfall 5 discharging to Riprap Apron 4? What is the invert elevation of Outfall 5 and how high is it from the streambed/riprap apron?

23. §105.301(3): Outfall 2, which discharges stormwater from a proposed rock trench to UNT 1, is currently aligned to be facing upstream. The outfall alignment should be revised to face either across or downstream so as to minimize disruption of the stream flow.

24. §105.231(iii): Based on the plan drawings, it appears that UNT-1 will be converted to a rock-lined channel from the inlet of Culvert 1 upstream to the outfall of proposed drainage channel #3. Please

provide a detail or a section view in the plan drawings for this portion of constructed stream channel. Include information on channel dimensions, rock sizing, and slope. A low flow channel should be provided to allow for aquatic organism passage. Provide calculations demonstrating that the rock size chosen will remain stable during the 100-yr flood event and that the channel is sized appropriately to convey the 100-yr storm flows.

25. §105.282: There is an existing stormwater pipe which discharges onto the site from under Camp Meeting Road and appears to become a stream with defined banks and flowing water, as witnessed during a site visit on 5/21/2025. On the plans, this is identified as a brown "Roadway Drainage" line. See screenshot below. As proposed, this pipe will now discharge to a steep slope with no defined channel or erosion protection which may lead to erosion of the slope supporting Camp Meeting Road. Please provide a stabilized channel for this stream which routes it to either proposed drainage channel #3 or UNT-1.



26. §105.46(b): Pump Arounds 1 and 2 are proposed to route water from UNT-1 around the work area to UNT-2. However, these pump around lines appear to go to an area where UNT-2 is within an existing culvert, thus the water will not be routed directly to the channel of UNT-2. Revise the E&S plan drawing to show the bypass line discharging directly to the stream channel.

27. §105.46(a): It is noted that a submission was made to Allegheny County Conservation District for an Individual NPDES permit. Please discuss the status of this permit application. The Waterway & Wetlands Program will conduct a concurrent review, but should we complete our review and evidence that other, required permits have not been secured, the Department may withdraw this application. You would then need to resubmit your application.

Environmental Comments

28. §105.13(e)(1)(vii), §105.14(b)(7), & §105.18a(b)(3)(ii)(A): While you stated that other sites and locations were infeasible, you did not provide a detailed discussion of what other sites were considered. Accordingly, evaluate the feasibility of utilizing one or more other sites for the new high school and associated facilities to avoid or minimize impacts to the waters of this Commonwealth.

29. §105.13(e)(1)(vii), §105.14(b)(7), & §105.18a(b)(3)(ii)(A): Related to the preceding comment, evaluate the feasibility of continuing to use the current high school with renovations or constructing

the new high school on the existing site in a manner that would avoid or minimize adverse impacts to the waters of this Commonwealth.

30. §105.13(e)(1)(vii), §105.14(b)(7), & §105.18a(b)(3)(ii)(A): In your Environmental Assessment, you stated that Leetsdale Borough has requested that in your current design that you provide stormwater management to mitigate for an upstream, off-site residential area within Leet Township that drains to UNT-1. Accordingly, evaluate the feasibility of utilizing one or more alternative locations or other for the aforementioned stormwater management to avoid or minimize impacts to the waters of this Commonwealth.

31. §105.13(a) & 105.14(5)(c): During the field site visit with you on May 21, 2025, additional watercourse resources were identified, which will be directly affected by your project. As such, provide resource classification information, Riverine Level 2 rapid condition assessment results, discussion of resource functions, or studies conducted for these additional resources, which are also listed below, and any other watercourse resources found during your investigation, revise your Aquatic Resources Impact Table (ARIT), site drawings, project narrative, etc. as needed, and address the following items:

    a. Regarding the feature labeled as Roadway Drainage on Sheet B100, Overall Existing Plan, which was found to have a defined channel and banks with flowing water, and based on the results of your investigation, provide the following information:

        i. §105.13(e)(1)(i)(A) & §105.152(a)(1): Revise your site plan to include said watercourse and its floodway and any proposed work to the storm pipe crossing beneath Camp Meeting Road and the culvert crossing downstream of said pipe.

        ii. §105.13(e)(1)(i)(G), §105.152(a)(2), & §105.231(e)(1)(iii): Provide cross sectional views of the watercourse before and after the structure or activity is constructed, including, but not limited to, any proposed changes to the stormwater pipe crossing under Camp Meeting Road, the removal of the culvert crossing downstream of said pipe, and any proposed channel changes.

        iii. §105.231(e)(1)(ii): Related to the preceding comment, provide a stream profile for a reasonable distance upstream, to include the aforementioned storm pipe, and downstream, to show how this stream flow will be conveyed to UNT-1. This stream profile should also show the proposed channel change, bed slopes, normal water surface and depths, flood water surfaces, and existing obstructions.

        iv. §105.13(e)(1)(vii) & §105.14(b)(7): Evaluate the feasibility of alternative layouts and designs or other to avoid or minimize impacts to the watercourse, such as utilizing the existing stream channel.

        v. §105.13(e)(1)(vii) & §105.14(b)(7): Related to the preceding comment, evaluate the feasibility of modifying your design to minimize the adverse impacts to the watercourse, such as, constructing the new channel with natural streambed material and/or including a low flow channel, to maintain stream functions and aid aquatic organism passage.

b. Regarding the feature located adjacent 4’ north and running parallel to the aforementioned watercourse, and based on the results of your investigation, provide the following:

   i. §105.13(e)(1)(i)(A): Revise your site plan to include the watercourse and its floodway.

   ii. §105.13(e)(1)(i)(G) & §105.231(e)(1)(iii): Provide cross sectional views of the watercourse before and after the structure or activity is constructed, including, but not limited to, any proposed channel changes.

   iii. §105.231(e)(1)(ii): Related to the preceding comment, provide a stream profile for a reasonable distance upstream and downstream, to show how this stream flow will be conveyed to UNT-1. This stream profile should also show the proposed channel change, bed slopes, normal water surface and depths, flood water surfaces, and existing obstructions.

   iv. §105.13(e)(1)(vii) & §105.14(b)(7): Evaluate the feasibility of alternative layouts and designs or other to avoid or minimize impacts to the watercourse, such as utilizing the existing steam channel.

   v. §105.13(e)(1)(vii) & §105.14(b)(7): Related to the preceding comment, evaluate the feasibility of modifying your design to minimize the adverse impacts to the watercourse, such as, constructing the new channel with natural streambed material and/or including a low flow channel, to maintain stream functions and aid aquatic organism passage.

c. Regarding the drainage feature flowing from Wetland 1 to UNT-1 to the Ohio River, and based on the results of your investigation, provide the following:

   i. §105.13(e)(1)(i)(A): Revise your site plan to include the watercourse and its floodway.

   ii. §105.13(e)(1)(i)(G) & §105.231(e)(1)(iii): Provide cross sectional views of the waters and floodway to be impacted before and after the structure or activity is constructed, including, but not limited to, any proposed channel changes.

   iii. §105.231(e)(1)(ii): Related to the preceding comment, provide a stream profile for a reasonable distance upstream and downstream, to show how this stream flow will be conveyed to UNT-1. This stream profile should also show the proposed channel change, bed slopes, normal water surface and depths, flood water surfaces, and existing obstructions.

   iv. §105.13(e)(1)(vii) & §105.14(b)(7): Evaluate the feasibility of alternative layouts and designs or other to avoid or minimize impacts to the watercourse, such as utilizing the existing steam channel.

   v. §105.13(e)(1)(vii) & §105.14(b)(7): Related to the preceding comment, evaluate the feasibility of modifying your design to minimize the adverse impacts to the

watercourse, such as, constructing the new channel with natural streambed material and/or including a low flow channel, to maintain stream functions and aid aquatic organism passage.

32. The streams identified as UNT-3, UNT-4, and UNT-5 in your response submitted on May 23, 2025, were investigated during the aforementioned site visit. While the upper reaches of these streams were evaluated as ephemeral streams, you will need to determine whether any portions of the lower reaches, such as the confluence with UNT-2, exhibit groundwater connectivity. Additionally, based on the results of your investigation, provide the following:

    a. §105.13(e)(1)(i)(A): Revise your site plan to include said watercourses and associated floodways.

    b. §105.13(e)(1)(i)(G) & §105.231(e)(1)(iii): Provide cross sectional views of said watercourses before and after the structure or activity is constructed, including, but not limited to, any proposed enclosures, outfalls, and/or channel changes.

    c. §105.191(2) & §105.231(e)(1)(ii): Related to the preceding comment, provide stream profiles for a reasonable distance upstream and downstream, to show how this stream flow will be conveyed to UNT-2. This stream profile should also show the proposed channel changes, enclosures, outfalls, bed slopes, normal water surface and depths, flood water surfaces, and existing obstructions.

33. §105.13(e)(1)(vii) & §105.14(b)(7): Evaluate the feasibility of the following alternatives to avoid or minimize impacts to UNT-1:

    a. You propose to construct a stormwater basin (SWMF-1) in the stream channel of UNT-1. Accordingly, evaluate the feasibility of alternative designs and layouts to avoid or minimize impacts to UNT-1, such as relocating or reducing the size of SWMF-1.

    b. You propose to place and maintain fill in 637 LF of UNT-1 and construct and maintain 610 LF of new channel in a new location, a portion of which will be enclosed within a 104 LF 48” RCP enclosure with 29 LF R-6 riprap outlet apron (ENC-1), which will carry an access road to the high school, and a 209 LF 48” RCP enclosure with 29 LF R-6 riprap outlet apron (ENC-2) downstream of ENC-1. Accordingly, evaluate the feasibility of alternative designs and layouts to avoid or minimize impacts to the watercourse, such as alternative routings for your stormwater management system and/or utilizing the existing stream channel of UNT-1.

    c. Related to preceding comment, you propose to relocate 266 LF and eliminate 27 LF of UNT-1 stream channel. Accordingly, evaluate the feasibility of alternative designs to avoid or minimize impacts to UNT-1, such as reducing the reaches of UNT-1 stream channel being relocated, maintaining the full span of UNT-1, and/or reducing the length of the enclosures.

    d. Related to the preceding comment, evaluate the feasibility of modifying your design to minimize impacts to UNT-1, such as incorporating low flow channels, constructing the inlet for ENC-1 with natural streambed material in lieu of a rock lined channel, replacing the stilling well at the outfall of ENC-1, and including low flow channels in the enclosures,

within SWMF-1, and in the primary spillway of SWMF-1, to maintain stream functions and aid aquatic organism passage.

34. §105.13(e)(1)(vii) & §105.14(b)(7): Evaluate the feasibility of the following alternatives to avoid or minimize impacts to UNT-2:

    a. Evaluate the feasibility of alternative designs and layouts to avoid or minimize impacts to UNT-2, such as different routings for your stormwater management.

    b. Related to the preceding comment, evaluate the feasibility of reducing the length of ENC-2 to avoid or minimize impacts to UNT-2.

    c. Related to the preceding comment, evaluate modifying your design to minimize impacts to UNT-2, such as including a low flow channel to aid aquatic organism passage.

35. §105.13(e)(1)(ix): Related to the preceding comments, you propose to purchase stream mitigation credits to offset the project's steam impacts. As such, provide a credit availability or reservation letter(s) from the compensation provider(s). The letter must be from the credit provider and addressed to the applicant and include at a minimum the following:

    i. Legal name of the credit provider;
    ii. WO&E Compensation Operation Permit number;
    iii. Contact information for the credit provider;
    iv. Statement by credit provider attesting to credit availability or reservation (i.e. a credit may not be simultaneously represented in credit availability letters to multiple applicants);
    v. Specify the credit type(s) and amounts by resource type(s); and
    vi. Specify any time limitations (e.g. expiration date) placed on the credit availability or reservation commitment.

36. §105.13(a), §105.13(e)(1)(x)(A), §105.14(5)(c), §105.18a(b)(1)(ii)(3), & §105.20a(a): During the aforementioned site visit, it was discussed that further investigation is needed for the currently delineated Wetland 1 and for a potential second wetland, which will be directly affected by your project. As such, provide resource classification information, Wetland Level 2 rapid condition assessment results, discussion of resource functions, or studies conducted for these additional resources, which are also listed below, and other wetland resources found during your investigation, revise your Aquatic Resources Impact Table (ARIT), site drawings, project narrative, etc. as needed, and address the following items:

    a. Regarding the currently delineated wetland north of UNT-1, and based on the results of your investigation, provide the following:

        i. §105.13(e)(1)(x)(A): The boundary of the wetland appeared to extend further north than indicated. As discussed during the site visit, conduct further field investigations to see if this wetland boundary should be expanded and provide wetland data forms, including an upland sample point, supporting your delineated wetland boundaries.

ii. §105.13(e)(1)(viii)(A), §105.14(b)(7), & §105.18a(b)(1)(ii)(3): You propose to place fill in and to route a rock lined drainage channel through Wetland 1. Accordingly, evaluate the feasibility of alternative designs and layouts, such as routing the drainage channel outside of the wetland or reducing the amount of fill placed in the wetland.

iii. §105.13(e)(1)(viii), §105.14(b)(7), & §105.18a(b)(1)(ii)(3): Related to the preceding comment, evaluate the feasibility of modifying your design to minimize impacts to Wetland 1, such as constructing the rock lined channel with natural streambed material.

iv. §105.13(e)(1)(ix), §105.14(b)(7), & §105.20a(a): Related to the preceding comment, you propose to construct on-site wetlands adjacent to Wetland 1 to mitigate for the loss of wetlands. Accordingly, provide construction details and a monitoring plan for the proposed wetland construction, and, additionally, demonstrate that there will be sufficient hydrology to maintain the new wetland. If instead you propose to purchase mitigation bank credits, provide the same information as requested above regarding your stream mitigation plan.

b. §105.13(a), §105.13(e)(1)(x)(A), §105.14(5)(c), & §105.18a(b)(1)(ii)(3): During the aforementioned site visit, hydrophytic vegetation was observed at the perimeter of the existing pond at the approximate location of SP-3 within your wetland delineation report. As such, reevaluate said location for the presence of a wetland landward of the sedimentation pond. Based on the results of your investigation, if a wetland is found to be present, provide the following information:

i. §105.13(e)(1)(i)(A) & §105.152(a)(1): Revise your site plans to include the wetland.

ii. §105.13(e)(1)(i)(G), §105.152(a)(2), & §105.231(e)(1)(iii): Provide cross sectional views of the wetland before and after the structure or activity is constructed.

iii. §105.13(e)(1)(viii)(A), §105.14(b)(7), & §105.18a(b)(1)(ii)(3): Related to the preceding comment, based on your currently proposed work, the wetland would be entirely filled. Accordingly, evaluate the feasibility of alternative designs and layouts to avoid or minimize impacts to said wetland, such as relocating or reducing the size of SWMF-1.

iv. §105.13(e)(1)(ix), §105.14(b)(7), & §105.20a(a): Related to the preceding comment, if you are able to demonstrate that you cannot avoid or further minimize impacts to this potential wetland, you may have to increase the amount of wetland mitigation to be provided.

37. §105.14(b)(4) & §105.18a(b)(5): Provide documentation demonstrating that all fill to be placed is clean fill.

38. §105.14(a)(1): Provide proof of ownership, an easement, or permission from the owner of the storm pipes crossing beneath Camp Meeting Road and located in the head waters of UNT-1 to complete your proposed replacement of said structure.

39. §105.14(a)(1): If you propose to modify or replace the storm water pipe crossing beneath Camp Meeting Road and located in the feature labeled as Roadway Drainage on Sheet B100, Overall Existing Plan, provide proof of ownership, an easement, or permission from the owner of the storm pipe to complete any proposed work.

40. §105.14(b): In your application, you stated that the sanitary utility line relocation will be completed by the applicant; however, during the aforementioned site visit, you stated that the work may be completed be the utility line owner instead. Accordingly, provide the following:

    a. If the applicant will be completing the work, provide proof of ownership, an easement, or permission from the owner of the sanitary sewer lines to complete your proposed work.

    b. If the owner is to conduct the work, provide evidence that the owner has submitted or will submit an application for the necessary Chapter 105 Water Obstruction and Encroachment permits prior to the start of your proposed work. Alternately, provide the name and contact information for the owner of this utility line. In addition, revise your ARIT to remove this activity.

41. §105.14(b): In your application, you stated that the removal of the gas utility line running along UNT-2 will be completed by the applicant; however, during the aforementioned site visit, you stated that the work may be completed be the utility line owner. Accordingly, provide the following:

    a. If the applicant will be completing the work, provide proof of ownership, an easement, or permission from the owner of the gas utility lines to complete your proposed work. In addition, revise your ARIT to reflect that removing the existing gas line is a permanent impact.

    b. If the owner is to conduct the work, provide evidence that the owner has submitted or will submit an application for the necessary Chapter 105 Water Obstruction and Encroachment permits prior to the start of your proposed work. Alternately, provide the name and contact information for the owner of this utility line. In addition, revise your ARIT to remove this activity.

42. §105.14(b): You show that a new gas utility line crossing UNT-2 will be constructed by the utility owner upstream of the SWMF-1 secondary spillway. Accordingly, provide evidence that the owner has submitted or will submit an application for the necessary Chapter 105 Water Obstruction and Encroachment permits prior to the start of your proposed work. Alternately, provide the name and contact information for the owner of this utility line.

43. §105.13(e)(1)(x) & 105.15(b)(5): Per the letter, in your submission, from the Pennsylvania Historical and Museum Commission (PHMC) dated January 9, 2025, the project has the potential to affect the property associated with the Muotta House (Resource #2004RE03024), which was determined eligible for listing in the National Register of Historic Places under Criterion C in the area of architecture. Accordingly, demonstrate that said PHMC concern has been resolved.