PROJECT NARRATIVE FOR HEALTHY MINDS TREATMENT CENTER

PROJECT DESCRIPTION

The Healthy Minds Treatment Center ("Healthy Minds" or "Treatment Center") will be an inpatient behavioral health rehabilitation center with a proposed capacity of 60 beds. Residential Treatment Centers are permitted through the Conditional Use application process. A description of the proposed Project and an outline of compliance with the requirements of the Zoning Ordinance and referenced regulations are provided in this narrative.

THE PROPERTY AND ITS HISTORY

The Treatment Center will be located on a portion of the former Wolf Hollow Country Club. Healthy Minds LLC will operate on the portion of the former country club that is a 33.74-acre parcel identified as Parcel ID 16.9.1.22 that lies along Totts Gap Road in Smithfield Township, Pennsylvania. Healthy Minds will construct a main building and additional improvements to the property and its infrastructure.

OWNERSHIP OF PROPERTY

The Healthy Minds Treatment Center property is owned by Water Gap Acquisitions Partners LLC, pursuant to a deed recorded in the Office of the Recorder of Deeds for Monroe County, Pennsylvania on April 16, 2013 in Record Book 2418 on Starting Page 6739. Parcel 16.9.1.22

Pursuant to a Property Lease Agreement dated XXX, Water Gap Acquisitions Partners LLC has agreed to lease the property to a Healthy Minds Partners LLC.

PROGRAM OVERVIEW

Healthy Minds Treatment Center will be a private, sub-acute and freestanding Inpatient behavioral health Alcohol Rehabilitation Center ("Residential Treatment Center"). The facility will be licensed by and under the jurisdiction of the Pennsylvania Department of Drug and Alcohol Programs and the Department of Health Services. This co-ed facility will provide clients with the opportunity to engage in the process of self-reflection and change, leading to recovery from mental illness and dependency and a return to a chemical-free, productive life.

PHILOSOPHY AND PURPOSE

The rehabilitation program at Healthy Minds is based upon the belief that mental illness, alcoholism, and drug dependency are primary diseases. The program is designed to recognize and affirm that a person suffering from mental illness or substance dependency has the capacity to:

- Abstain from all mood-altering substances
- Achieve his or her potential
- Demonstrate personal freedom and responsibility
- Exercise self-determination and personal choice
- Realize personal growth and change, and
- Form meaningful, workable relationships with the world outside of himself or herself

Each of the foregoing factors is vital to recovery from mental illness and substance dependency.

PROGRAM FRAMEWORK

GOALS OF TREATMENT

The mission of Healthy Minds rehabilitation program is to assist the adult suffering from mental illness and substance dependency to achieve three (3) long-term goals:

- 1. Education and skill-building, helping individuals develop coping skills and improve their understanding of their conditions.
- 2. Medication evaluation, adjustment, or initiation to provide symptom relief and overall well-being.
- 3. Relapse prevention by equipping individuals with the necessary tools and strategies to prevent relapse.
- 4. Aftercare planning, including developing a comprehensive aftercare plan, connecting clients with appropriate resources, and establishing ongoing support systems such as outpatient therapy or support groups.

ADMISSION CRITERIA

The treatment facility will provide in-patient services to those individuals who have been identified as experiencing difficulties due to mental illness or the use of drugs and/or alcohol. To qualify for admission to the treatment program, the individual must be at least eighteen (18) years of age and must have sufficient hearing, speech, and verbal skills to effectively participate in the therapy offered.

TREATMENT OVERVIEW -Residential Treatment

Residential treatment is an intensive phase of behavioral health treatment. Initially, clients present their personal history to their psychotherapy group, and a personalized treatment plan is created. Each client is assigned a treatment team that includes a psychiatrist or psychiatric nurse practitioner, a primary therapist, and a case manager.

Clients are enrolled in a structured program daily, seven days per week. Each day, clients participate in multiple group talk therapy sessions, which include discussions on various topics, like spirituality, relapse prevention, conflict resolution, and stress management. Clients also receive one-on-one counseling sessions with their primary therapist no less than weekly and meet regularly with a psychiatrist or psychiatric nurse practitioner for additional counseling and medication management.

The goal of programming is to address any problems that may hinder the client's progress, to remove obstacles to the client achieving the maximum benefit from treatment, and to equip clients with the skills and coping strategies necessary to live a safe and productive life.

Government Regulations and Licensure

The treatment center will maintain all required licenses and permits from the Pennsylvania Department of Drug and Alcohol Programs, the Pennsylvania Department of Human Services, the Pennsylvania Department of Labor and Industry, and Monroe County. The applicable state regulations with which Healthy Minds must comply cover all aspects of operating a licensed and accredited treatment center, include:

- Staffing Requirements
- Qualifications of Staff
- Certification of Programs
- Physical plant requirements
- Size and design of counseling areas
- Size and design of resident accommodations
- Intake and admission procedures
- Nature of treatment and programs
- Security
- State inspections

Hours of Operation

The treatment center will be open 24 hours per day, 365 days per year.

Number of Clients (Residents)

The maximum number of clients will be 60.

Reserved Beds for Veterans

Healthy Minds will reserve five percent (5%) of its available beds for veterans regardless of their ability to pay.

Limitation to In-patient Treatment Only

All services shall be in-patient. There will be no outpatient counseling or programs.

Length of Stay

The length of stay for each client is expected to range from 25-40 days.

Prohibited Items

The following items can be harmful or potentially harmful to clients or others while in the therapeutic environment and are therefore prohibited:

- Straight edge razors
- Aerosol cans
- Any items containing alcohol.
- Guns, knives, scissors, or weapon-type objects
- Toxic magic markers
- Nail clippers

Upon admission, the client's belongings, including suitcases, clothes, purses and wallets, are searched to insure that no impermissible items are present.

Clients are not permitted to have a vehicle at the treatment center. All clients will be dropped off and picked up.

Dress Code

Clients will be required to abide by the dress code instituted by Healthy Minds.

Client Intake and Assessment

To be admitted to Healthy Minds Treatment Center, a prospective client must meet a comprehensive set of admission criteria. In connection with admission into the program, each client must undergo a series of detailed screenings and assessments, including:

- Physical assessment
- Screening for signs of abuse
- Screening for domestic violence
- Nursing history and assessment
- Assessment for impaired cognitive functioning
- Mini mental state exam
- Mental status screening
- Psychiatric evaluation
- Emotional, behavioral and cognitive screening assessment
- Nutritional assessment
- Legal history and screening
- · Screening for client risk of self-harm
- Screening for the risk of violence

The various assessments are completed to identify client needs, provide comprehensive treatment, and to identify the need for services that are beyond the scope of those provided by the Healthy Minds Treatment Center.

The admission criteria are further designed to identify persons who both wish to obtain treatment and who can be helped by the available programs at the facility. Persons who are suffering from a medical disorder that requires acute medical care are not eligible for admission. A person who appears to present potential to be a management problem whereby his or her behavior would cause harm, injury or major distress to others or to the therapeutic environment will not be admitted into the program. If a prospective client does not meet the admission criteria, the staff will seek to recommend a resource with the potential to meet the client's needs.

Healthy Minds Treatment Center will not accept clients who are referred to the facility to attend court-ordered mandatory rehabilitation treatment as part of their criminal sentence.

Voluntary Termination of Treatment

If a client indicates an intention to terminate his or her treatment and wishes to depart from the Treatment Center against medical or clinical advice, the staff will seek to intervene to encourage the client to complete their treatment. If a client nevertheless insists on voluntarily terminating his or her treatment, the Treatment Center will call the client's emergency contact and request that the client be transported from the facility. If the emergency contact is unable or unwilling to come for the client, staff will make alternative arrangements for the transport to the client's final destination.

Involuntary Termination of Treatment

Any client whose behavior becomes detrimental to his or her ability to benefit from therapy, or when it affects another client or the general client community, may be issued a therapeutic discharge. Among the actions that may cause the involuntary termination of treatment are acts of physical violence, use of alcohol or drugs, or refusal to participate in scheduled activities, refusal to follow rules and regulations and consistent behavior that is disruptive to the overall client community or detrimental to the recovery of other clients. If a client's treatment is involuntarily terminated, the Treatment Center will call the client's emergency contact and request that the client be transported from the facility. If the emergency contact is unable or unwilling to come for the client, the client will be transported from the facility in the same manner as described above for the voluntary termination of treatment.

Staffing

The Treatment Center must comply with the staffing requirements established by the Pennsylvania Department of Drug and Alcohol Programs and the Pennsylvania Department of Health Services for a licensed facility. The total number of staff to residents overall over 3 shifts is expected to be approximately 1.2:1.

The total number of staff at peak period, which is first shift during normal working hours, is expected to be 40 staff, or 0.66:1. During second shift, total staff is expected to be 20 people, or 0.33:1, and overnight, total staff is expected to be 10 people, or 0.17:1.

Clinical staff members must meet the appropriate educational and experiential qualifications and receive training as required by the applicable Pennsylvania regulations.

The following is the anticipated staffing and daily schedule:

- Nurses: 24 hour coverage in three shifts 7am 3pm, 3pm 11pm, and 11pm 7 pm.
- Counselors and Clinical Administration: 8am 4:30pm
- Clinical Aides: 3pm 11pm, 11pm-8am
- Maintenance Personnel: 7am-3pm; on call for emergencies
- Medical Staff: 8am 4:30pm; on call at other times

Security Protocols

The Treatment Center will comply with all security regulations applicable to licensed facilities. There will be 24 hour per day, 365 days per year on-site supervision by trained personnel. In addition, the facility will be served by an electronic surveillance system that will be monitored at all times by a trained staff member. The surveillance system will be installed in such a manner as to allow for the perimeter of the property to be viewed by video monitors. The video monitors will be located in a separate room in the facility and monitored by trained personnel on a continuous basis, similar to such video surveillance systems utilized for security purposes in modern business and property management.

Staff is on "awake" duty around the clock and responsible to perform security and safety surveillance activities and roll call as a part of their shift responsibilities. During "off hours," staff performs rounds on a frequent but unscheduled basis to insure the safety and security of the facility and clients. Staff conduct client "bed checks" throughout the evening and staff are trained in the procedures to take if a client is determined to be missing.

Visitation

Visitation shall permitted on Sundays between 12pm and 5pm. Visitors shall be at least thirteen (13) years old and are limited to immediate family of the client. Each client is allowed visitors one Sunday per month and a maximum of three (3) family members for visitation. Visitation on other days of the week is limited and permitted on an "as necessary" basis when accommodations can be made.

Based upon a full occupancy of 60 beds, it is anticipated that there will be approximately 15 visitors on any given Sunday. There will be few visitors on other days of the week.

Visitation shall be conducted in the central living room of the building. Visitors are not permitted in any client bedrooms. Visitors also must comply with the facility's dress code and will be required to attend any meetings scheduled during visiting hours. Any packages brought for a client will be inspected by a staff member before being given to the client.

Outside Deliveries

It is anticipated that the facility will have 2 or 3 trucks making deliveries 2 or 3 times per week, typically between the hours of 9am and 11am. These deliveries will be for food and other necessary supplies.

Emergency Services

The Treatment Center will have a written plan for emergency services that complies with the licensing requirements of the Pennsylvania Department of Drug and Alcohol Programs and the Pennsylvania Department of Health Services. Emergency medical and psychiatric services are accessible through Lehigh Valley Hospital-Pocono and St Luke's Hospital - Monroe. Transportation to and from any emergency service facility will be coordinated by Treatment Center staff. The client will be transported by a Treatment Center staff member or by an ambulance service with which Healthy Minds is contracted.

Police protection will be provided by the Pennsylvania State Police and the Stroud Area Regional Police. Fire protection will be provided by the Delaware Water Gap Fire Company and the Stroudsburg Borough Fire House

Conditional Use Application

A Conditional Use application and fee has been provided with the submittal to the Zoning Officer. It includes:

- One application for a public hearing complete and properly prepared. Forms furnished by the Township.
- Ten copies of a tentative site development plan of the conditional use.
- Ten copies of a statement of purpose and extent of the conditional use.
 - 1. This statement should outline in detail the conditional use, any future changes and present and future ownership.
 - 2. This statement is presented above and as follows.

Site Development Plans

Ten copies of Six Site Development Plan sheets have been provided that show the requirements of Chapter 27 Section 705 Ordinance requirements. The purpose of the site plan is to evaluate the ability of the project to meet the conditional use criteria contained herein and not necessarily to give final approval when further submissions under the Township's Subdivision and Land Development Ordinance [Chapter 22] or other Township Ordinances are required.

Drainage

Runoff from the site drains overland to the Northeast and eventually drains into Cherry Creek (Defined specifically in the PA Chapter 93 code as Cherry Creek – Basin, LR 45010 Bridge to Mouth – CWF, MF).

For a water quality and streambank erosion water quality BMP, the subsurface infiltration system detains the proposed conditions for the 2-year, 24-hour design storm to the existing 1-year, 24-hour flow as displayed below:

Volume to BMPs

2-Year Rainfall:

3.33 in

UG Detention System (BMP 1)	Soil Type	Area (sf)	Area (ac)	CN	s	la (0.2*5)	Q Runoff ¹ (in)	Runoff Volume ² (ft ³)
Impervious	D	41,815	0.96	98	0.20	0.04	3.10	10792
Lawn	D	21,780	0.50	89	1.24	0.25	2.20	3994
TOTAL		63,595	1.460					14,786

It will be necessary to compute the pre- and post-development peak flow rates for the 2-, 5-,10-, 25-, 50-, and 100-year storm frequencies to meet Smithfield Township requirements. The post-development rates can not exceed the pre-development 1-, 2-, 5-, 10-, 25-, 50-, and 100-year storms respectively. Post-development stage-storage volume, inflow hydrographs, basin routing, and outflow hydrographs for the basin infiltration system will be produced with Hydraflow Hydrographs Extension for AutoCAD Civil 3D 2020 for the Land Development Plan submittal. A Report titled Soil Feasibility Evaluation for Healthy Minds Treatment Center is attached and provides soil test reports, regulatory guidance and map locations with a conclusion that the project has areas deemed generally suitable for the Treatment Center. Infiltration/permeability testing will be needed for the final design Land Development stage of the project.

The overall stormwater management concept for the project will be designed in accordance with Chapter 26 Part 2 Subsection 222 of the Smithfield Township code and NPDES Storm Water permitting for projects with earth disturbance greater than one acre. Groundwater Recharge requirements are met by providing the required capacity within the subsurface infiltration system. The basin as approximately (can be enlarged or reduced) shown should reasonably control Township Ordinance and NPDES requirements when final design is completed and Land Development requirements apply.

Landscaping Plans

A Landscaping Plan in the Site Development set offers information that is sufficiently detailed and illustrative to determine compliance with § **27-502**, Subsection **7** and the buffering and screening requirements contained therein, but final landscaping plans are being deferred to the land development stage of approval.

Lighting Plans

A Lighting Plan in the Site Development set offers information that is sufficiently detailed and illustrative to provide illumination of areas for motor vehicle access, off-street parking, off-street loading and similar areas.

Signage

There are no signs proposed at this time. It is understood that any future signs would be subject to all Ordinance requirements of the Township.

Wetlands

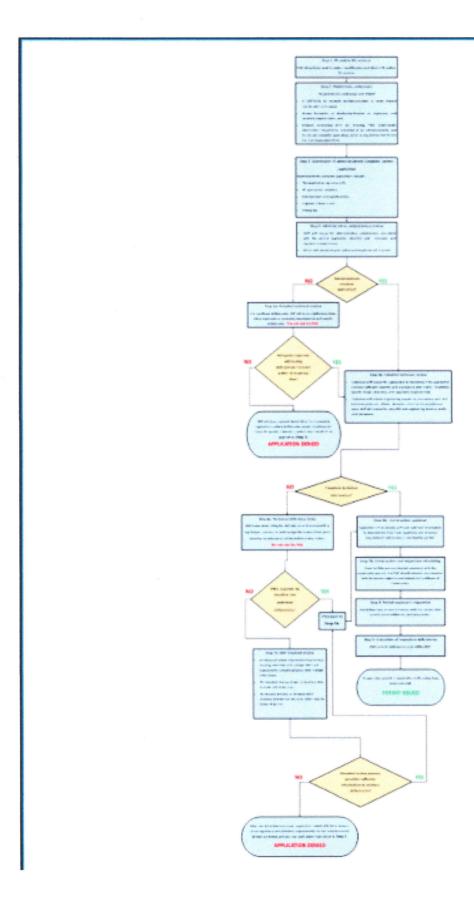
A wetlands presence/absence assessment was completed for the project area that included a map depicting approximate wetlands locations. A copy of the assessment is attached at the end of this Narrative. Wetlands and other regulated waters were identified on the 32 acre site, but not within the project earth disturbance area.

Sanitary Sewage Treatment and Disposal

A Report titled Soil Feasibility Evaluation for Healthy Minds Treatment Center is attached and provides soil test reports, regulatory guidance and map locations with a conclusion that the project has areas deemed generally suitable for the Treatment Center anticipated flows of 8,100 gpd.

Water Supply

Water supply will be provided by an on-site well and will require permitting through the PA DEP. A quick review of the geology shows two rock types on site. These are the Bloomsburg and the Decker Formation through the Poxono Island Formation, undivided. These are two of the more prolific water producing wells in Monroe County which indicates a likelihood for success and feasibility of the Water system. Locating the well will include investigation of wellhead protection radii and protection provisions like the prohibition of pesticides and herbicides. Also, no chemical or petroleum storage will be allowed near the well. A Permit Flow Chart is offered below. It shows the necessary planning and design functions that will be required for the Land Development phase of the project and beyond.



Traffic Assessment

A Traffic assessment has been included as an attachment in the back of this Narrative that derives trip generation figures and use description criteria to arrive at a direct project related impact basis. Smithfield Township Ordinance Section 27-404A has a Traffic Impact Study requirement for generation of over 500 trip-ends. The maximum anticipated Daily vehicular trips of 264 does not reach that threshold. Therefore this Assessment is offered with the conclusion that a Traffic Impact Study is not required for this project.

Community Impacts

The proposed use will not have a detrimental impact on adjacent properties. The private facility is set back from the road in a secure setting governed by strict regulations and standards of care. The large golf course around it is being preserved and will still function as it presently does. The new use does not produce a significant negative impact on the property values of adjacent properties nor does it create potential nuisance impacts related to noise, odors, vibrations or glare. Residential treatment programs of this type are in great need as communities continue to cope with tragic losses that can be mitigated through these programs.

If the proposed use is one judged to present detrimental impacts through the upcoming Hearing process, it is agreed that an approval could be conditioned in such a manner as to eliminate or substantially reduce those impacts.

The use will have a positive effect on the environment by expanding landscape use, retaining all trees in the project area, providing NPDES permitted Best Management Practices for stormwater control. It will also promote job creation with 70 new staff, improve the economy during construction with taxable wages and after with an increased property tax base. Open space preservation is being maintained by the continuation of the golf course use over most of the property and numerous other factors being offered like desperately needed Treatment, Security and community presence which all reasonably relate to the health, safety and general welfare of present and/or future residents of Smithfield Township.

The granting of an approval will not cause an economic burden on community facilities or services including, but not limited to, highways (the traffic assessment confirms little trip generation and the access is close to Cherry Valley Road which is Collector type road/legislative route and connects to highways in two directions, Rt 611 to the east and Route 191 to the west), sewage treatment facilities (an on-site community system will be provided at the cost of the project as well as the maintenance to be provided), water supplies (an on-site potable well/water system will be provided at the cost of the project as well as the maintenance to be provided), and firefighting capabilities (a fire sprinkler system is proposed). The applicant agrees to be responsible for providing such improvements or additional services as may be required to adequately serve the proposed use and any approval shall be so conditioned. The Township is understood be authorized, subject to the limitations of the Pennsylvania Municipalities Planning Code, to request fees in support of such services where they cannot be directly provided by the applicant.

The site plan indicates the property will be developed and improved in a way which is consistent with that character of Township Ordinances and the Township's Comprehensive Plan, and is intended to

produce or protect, including appropriate landscaping and attention to aesthetics and natural feature preservation. Existing trees have been designed around and specifically targeted to remain while the site improvements are generously adorned with new and prolific landscaping.

On-site Activities and Operations

The nature of the on-site activities and operations, with minimal materials stored and closely secured by government regulations for Health and Safety, does not have a frequency of distribution and restocking like a manufacturing or retail use, the duration period of storage of materials is minimal due to regulated expirations, and the methods for disposal of any surplus or damaged materials is in strict compliance with Health industry standards. The opening part of this narrative furnishes evidence that the disposal of materials will be accomplished in a manner that complies with state and federal regulations. All other domestic type wastes are removed via dumpster where shown on the Site plan.

The general scale of the operation, in terms of its market area, specific floor space requirements for each activity, the total number of employees on each shift, the number of shifts, the hours of operation, and overall site size are contained in the opening art of this narrative.

Minimal environmental impacts are likely to be generated (e.g., odor, noise, smoke, dust, litter, glare, vibration, electrical disturbance, radiation, wastewater, stormwater, solid waste) because the plans and narrative identify specific measures employed to mitigate or eliminate any such negative impacts. The opening narrative furnishes evidence that the impacts generated by the proposed use fall within acceptable levels as regulated by applicable laws and ordinances.

The Site Plan presents credible evidence that the number of off-street parking spaces provided for the use is adequate and follows Township requirements. Delivery type vehicles (tractor trailer trucks are not anticipated but turning movements have been evaluated and found adequate to accommodate WB – 50 trucks if one enters the site or needs to be unloaded) meet the expected demand generated by the proposed use and its related activities and an appropriate space has been provided for such.

ATTACHMENTS:

WETLANDS ASSESSMENT
SOILS FEASIBILITY EVALUATION
TRAFFIC TRIP GENERATION ASSESSMENT
CONDITIONAL USE PLANS SET