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March 31, 2025
Project #1022419.004

Smithfield Township
Planning Commission
1155 Red Fox Road
East Stroudsburg, PA 18301

Dear Planning Commission:

RE: WATER GAP WELLNESS ACCESSORY BUILDINGS
Smithfield Township, Monroe County, Pennsylvania
Preliminary Land Development Plan Review

The following responses are offered in response to the comments in the review letter from the Township Engineer, T & M Associates, dated 01/07/2025. The documents provided in response to the comments are identified on the Transmittal accompanying this submission.

ZONING ORDINANCE COMMENTS:

1. This comment is acknowledged.
2. The cover Sheet, CS-1, now correctly indicates the existing use to which the recreation center is accessory is *Inn and Conference Center*.
3. The existing use of the site is as an Inn and Conference Center, as discussed with the Zoning Officer, who also confirmed that a Conditional Use is not required.
4. Previous Comment 3 was satisfied.
5. Previous Comment 4 was satisfied.
6. The plans have been revised to show the 75-foot wetland margin.
7. Previous Comment 5 was satisfied.
8. Previous Comment 6 was satisfied.
9. Previous comment 7 was satisfied.
10. The proposed Rec Center is an accessory building that will not create additional sleeping rooms to accommodate additional guests and therefore will not increase parking requirements. The number of sleeping rooms at the inn (48 rooms) will not change because no new construction or addition to the Inn is proposed. In accordance with Section 402.2, *Structures and uses in existence at the date of adoption of this Chapter shall not be subject to the requirements of this Part, so long as the kind or extent of use is not changed, provided*

that any parking facility now serving such structures or uses shall not in the future be reduced below such requirements. The parking calculation provided on the Cover Sheet shows that 64 spaces would be required for an Inn with 48 sleeping rooms (4 spaces for every 3 sleeping rooms); however, the Owner has confirmed that the 52 existing spaces now serving the Inn are adequate for current demand and no future reduction in parking is proposed. Therefore, according to Section 402.2 and Schedule II, footnote 2, no additional parking is required.

The requirement "*parking areas shall be at least 100 feet from all lot lines.*" in *Supplementary Regulation Applicable to Other Uses Section 511.1.D.* is not required for an *Inn*, as it is specifically applicable to *Resorts*.

11. As per the ordinance Section 502.6.B, the Lighting Plan was revised with labels to show the lighting level in footcandles at the property line.
12. Previous comment 9 was satisfied.
13. The existing use of the site is as an Inn and Conference Center, as confirmed with the Zoning Officer, and the use was revised on Sheet CS-1. As such, the standard in Section 511.1.B, "No building, activity area or recreation facility shall be erected within 50 feet of a road line or within 100 feet of a lot line" is a supplementary regulation applicable to a Resort, not an Inn.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS:

14. Approvals/permits from and submissions/correspondence with the following agencies shall be provided.
 - a. Smithfield Township Sewer Authority: Township SEO Scott Brown previously confirmed, in a 11/14/2024 e-mail, that Sewage Planning is not required and "The only permit that would be necessary is for the installation of the building sewer to connect the new building to the existing building sewer." This permit will be obtained prior to construction.
 - b. Brodhead Creek Water Authority: Kellie Davis, Brodhead Creek Regional Authority (BCRA), confirmed that the project is located outside of the BCRA's service area.

The Borough of Delaware Water Gap's Derek Anspach confirmed Borough water service is only available within the Borough.

The Inn is currently served by an existing on-site water system, and the proposed recreation center will be connected to this existing water system.
 - c. Fire Company: A copy of the plans was submitted to Michael Smith, Fire Chief of the Delaware Water Gap Fire Department, for his review of the fire lanes and firefighting access to the proposed recreation center. A copy of the letter requesting the review is included with this submission. Future correspondence from Chief Smith will be provided upon receipt.
 - d. Monroe County Planning Commission (MCPC): On September 23, 2024, MCPC provided copies of their correspondence to the Township.
 - e. MCCD/PA DEP: The approved NPDES Permit was provided to the Township by the Monroe County Conservation District in a March 10, 2025, e-mail.
15. A list of recipients with a "return receipt requested" for each abutting property owner is provided with this submission.
16. Previous comment 12 was satisfied.
17. A copy of the title report for the property will be provided under separate cover.
18. Previous comment 14 was satisfied.

19. Previous comment 15 was satisfied.
20. A partial boundary survey was completed in the vicinity of the proposed Recreation Center building to identify the required location of the proposed building and confirm setback distances. The existing use is an *Inn*, not a *Resort*; therefore, ZO §511.1.B is not applicable.
21. The right-of-way and cartway widths of Mountain Road, Vista Circle, Shepard Avenue, and Shepard Court are now shown on the plans.
22. Previous comment 18 was satisfied.
23. All known existing monumentation is now included on the plans.
24. An aerial photograph is provided as part of the plan set, on Sheets SCM-1 and MER-1, with source and date specified.
25. Previous comment 21 was satisfied.
26. As per the ordinance, the lighting plan was revised to show the lighting level in footcandles at the property line.
27. The Township was copied on the most recent technical comments and MCCD re-submission on March 4, 2025. A copy of the permit was provided to the Township by the Monroe County Conservation District in a March 10, 2025, e-mail.
28. Previous comment 24 was satisfied.
29. Previous comment 25 was satisfied.
30. Clearance from the U.S. Fish and Wildlife Service is included with this submission.
31. Previous comment 27 was satisfied.
32. Previous comment 28 was satisfied.
33. A partial boundary survey was completed, and the drainage easement is identified with metes and bounds, as shown on Sheets SP-1 and SP-2.
34. Previous comment 30 was satisfied.
35. The Landscaping Plan was revised to meet the requirements of this section, with 19 shade trees and 55 shrubs provided for the 546-feet of basin perimeter. The quantity of "To" shrubs listed in the Planting Schedule was revised to 16 to match the number shown on the plan. Trees on the berm were relocated off the berm, for conformance with §1101.1.F.(2)(e)(3).
36. Comment noted. Owner to discuss with Township at time of plan approval.
37. The 20-foot-wide drainage easement along the unnamed tributary to Cherry Creek is now shown in its entirety on Sheet SP-2 (to the property line) and located by metes and bounds. Sheet SP-1 shows the drainage easement providing access from the public right-of-way at Mountain Road.
38. A concrete outlet structure, with an open grate, is now proposed. See Outlet Structure Detail on Sheet PCD-1.
39. The top of the outlet structure with open grate is set one foot below the proposed top of the berm, at 452.00.
40. A waiver from SALDO §1301.7.L.(1) is requested to permit the use of HDPE pipe, in lieu of concrete pipe.
41. A waiver from SALDO §1301.7.Q.(2) is requested to permit the use of 12- and 15-inch diameter pipe HDPE pipe, in lieu of the 18-inch minimum diameter required.
42. Previous comment 36 was satisfied.
43. Previous comment 37 was satisfied.

STORMWATER MANAGEMENT ORDINANCE COMMENTS:

44. The invert of the outlet pipe was dropped to 543.75 to provide positive drainage from the roof drain to the outlet pipe, ensuring ponding does not occur in this low area.
45. Previous comment 39 was satisfied.
46. Previous comment 40 was satisfied.
47. Previous comment 41 was satisfied.
48. Previous comment 42 was satisfied.
49. Previous comment 43 was satisfied.
50. Previous comment 44 was satisfied.
51. Previous comment 45 was satisfied.
52. Previous comment 46 was satisfied.
53. Previous comment 47 was satisfied.
54. The approved NPDES Permit was provided to the Township by the Monroe County Conservation District in a March 10, 2025, e-mail. The Township was copied on the most recent technical comments and MCCD re-submission documents, on March 4, 2025.
55. Previous comment 49 was satisfied.
56. Previous comment 50 was satisfied.
57. Previous comment 51 was satisfied.
58. Additional topographical survey information was obtained, and the drainage areas were revised to include all upslope. All calculations were revised to accurately reflect these changes.
 - a. Previous comment 52.a was satisfied.
 - b. The drainage area to proposed Channel 1 was revised, as noted above.
 - c. Previous comment 52.c was satisfied.
59. A partial boundary survey was completed, and the easement is now identified with metes and bounds, as shown on Sheets SP-1 and SP-2. Note #3 was added to Sheet SP-1 which "permits, but does not obligate the Township to access and observe, repair, replace, and/or maintain the proposed stormwater management facilities should the property owner fail to do so, at no cost to the Township".
60. Previous comment 54 was satisfied.

STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS:

61. Previous comment 55 was satisfied.
62. The calculations were revised to accurately reflect the proposed design. The spacing specified on the Anti-Seep Collar Design worksheet is minimum and maximum spacing for the proposed collars. Given the proposed number of collars and length of pipe, they have been evenly spaced along the pipe length, a distance that falls between the minimum and maximum required. The Plans, Profile, and Detail are now consistent with the calculations.
63. The plans and calculations were revised for consistency.
64. The detail label on Sheet ESD-2 was revised for clarity to include a column specifying structure labels as well as outlet names.
65. Previous comment 59 was satisfied.
66. Previous comment 60 was satisfied.

67. Previous comment 61 was satisfied.
68. Previous comment 62 was satisfied.
69. Previous comment 63 was satisfied.
70. Previous comment 64 was satisfied.
71. Previous comment 65 was satisfied.
72. Additional topographical survey information was obtained, Channel 2 was eliminated, and updated drainage areas are shown on the plans. All calculations were revised to accurately show these changes.
73. The emergency spillway will handle run-off in excess of design flows, in accordance with the requirements of §22-1301.7.J. The spillway was designed to convey flow rates up to and including the 100-year proposed conditions with one foot of freeboard within the spillway, considering the primary outlet controls are blocked. The 3-feet height of embankment provides a minimum of one foot of freeboard above the maximum pool elevation computed when the facility functions for the 100-year proposed conditions inflow, per §26-228.3. We could not find the Ordinance requirement for the basin to retain stormwater (below the spillway) during all storm events; however, we'd like to discuss modifying the basin's internal side slopes from 4:1 to 3:1, to create additional storage capacity for the 100-year storm below the spillway crest elevation. We understand that a waiver of §22-1301.7.F would then be required for the 3:1 slopes.
74. The top-of-bank of the unnamed tributary to Cherry Creek was labeled on the plans. A Chapter 105 Water Obstructions and Encroachment General Permit (GP) 4 application for an outfall structure was prepared and submitted to the Pennsylvania Department of Environmental Protection on February 7, 2025. The GP-4 application was delegated and is under review by the Monroe County Conservation District. We anticipate issuance of the permit in April 2025.
75. The Plans and calculations were revised for consistency.

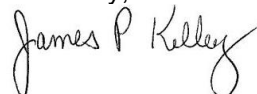
MISCELLANEOUS COMMENTS:

76. Previous comment 67 was satisfied.
77. Previous comment 68 was satisfied.
78. Previous comment 69 was satisfied.

PLAN REVISION COMMENTS:

79. The signature blocks on the plans have been revised as specified.
80. Sheet PP-1 was revised to list the sump elevation for MH-10.
81. The staple pattern specified on the Emergency Spillway detail on Sheet PCD-2 was revised to Staple Pattern D.
82. The detail on Sheet PCD-2 was revised to specify the matting on the basin side slopes.
83. Sheet PCD-1 was revised to include Detail A wire mesh shield.

Sincerely,



James P. Kelley, PE
Professional Engineer, Civil