



YOUR GOALS. OUR MISSION.

May 2, 2025

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

**SUBJECT: WATER GAP WELLNESS RECREATION CENTER  
PRELIMINARY LAND DEVELOPMENT PLAN REVIEW NO. 3  
SMITHFIELD TOWNSHIP, MONROE COUNTY, PENNSYLVANIA  
PROJECT NO. SMTW-R0016**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed our third review of the submitted Preliminary Land Development Plan Application. The submitted information consists of the following items.

- Transmittal letter prepared by Barry Isett & Associates, Inc., dated March 31, 2025.
- Response letter prepared by Barry Isett & Associates, Inc., dated March 31, 2025.
- Waiver Request letter prepared by Barry Isett & Associates, Inc., dated March 31, 2025.
- List of adjoining property owners.
- U.S. Fish & Wildlife Service clearance, email dated February 28, 2025.
- Letter addressed to Chief Michael Smith of the Delaware Water Gap Fire Department, prepared by Barry Isett & Associates, Inc., dated March 25, 2025.
- Post Construction Stormwater Management Analysis prepared by Barry Isett & Associates, Inc., dated August 27, 2024, revised March 10, 2025.
- Preliminary Major Land Development Plan for Water Gap Wellness Recreation Center (27 sheets) prepared by Barry Isett & Associates, Inc., dated August 26, 2024, revised March 28, 2025.

**BACKGROUND INFORMATION**

The Applicant, Water Gap Acquisitions Partners, LLC, is proposing a land development at their property located at 296 Mountain Road.

The existing property (Tax Map Parcel 16/9/1/26) is located in both Smithfield Township and Delaware Water Gap Borough. The proposed improvements are located entirely within Smithfield Township within its R-1, Low Density Residential Zoning District. The existing property has an area of 105.71 acres and is a portion of the previous Wolf Hollow Country Club. The existing property now operates as part of the Water Gap Wellness and consists of several buildings including the existing club house, living units, maintenance building, and garage. The property takes access via an existing driveway from Mountain Road.



The proposed land development will consist of one (1) 8,000 square foot recreation center with associated sidewalk and infiltration basin as part of the existing Water Gap Wellness Center. The limit of disturbance is 3.22 acres.

Based upon our review of the above information and our previous review letter dated October 9, 2024, we offer the following comments and/or recommendations for consideration.

### **ZONING ORDINANCE COMMENTS**

1. The submitted application proposes an 8,000 square foot recreation center, however it appears the application also includes the construction of a maintenance building which we are not aware a land development plan being submitted for. The building permit for the construction of this maintenance building shall be provided. ***(From Previous Comment 1) The building and zoning permits and the Certificate of Occupancy for the existing maintenance building were provided with a previous submission.***

The recreation center is proposed as an accessory use. The plan shall indicate the existing use that the recreation center is accessory to. ***(Previous Comment 2) The plan now indicates the proposed building is for a private resort, conference center and inn. Refer to Zoning Ordinance Comments 3, 10, and 13 related to the need for a Conditional Use, required parking, and building setbacks specific to the resort use. (Previous Comment 2) The plan has been revised to now note the existing use as an inn and conference center. Part 10 of the Zoning Ordinance, Definitions, defines Inn as "A combination of eating, lodging and recreational enterprises for extended stay vacations on land area of 10 acres or more, but not including any enterprise where more than 50 lodging accommodations are provided This project has a history of different land uses assigned to it. I believe when it was operating as a golf course it was considered a Resort Use. When that closed, an application was submitted to the Township for a Drug and Alcohol Rehabilitation Center. That use, initially granted by the Township, has been litigated in the courts. We do not know if the current Applicant has been issued a Use and Occupancy Permit to operate as an Inn and Conference Center. If the Township did issue that permit, that means the use has been changed from the previous Resort Use and from the Drug and Alcohol Rehabilitation Center Use. The Township Zoning Officer should opine on this. It is noted that an Inn is only permitted by Conditional Use, and we don't recall this Applicant having gone through a Conditional Use Hearing for an Inn. A Conference Center is not listed as a permitted use or accessory use in the R-1 Zoning District.***

- 3.-4. Previous Comments 4 and 5 satisfied.
5. In accordance with Section 401.3.D.(3), "no development, filling, draining, piping, diverting, or earth disturbance activities shall be permitted within a wetland. No more than 40% of the wetlands margin area shall be altered, regraded, or filled (noting that such limitation does not permit the alteration, regrading, filling of or building upon a wetland area, and noting further that the permitted encroachment into a wetlands margin area shall be measured independent of any other noncontiguous wetlands margin areas on a property). If this provision is found to be in conflict with any provisions of Chapter 26: Water, or any other local ordinance, or Pennsylvania or federal law, the provision which is more restrictive or which establishes the higher standard shall control." Per Section 1002, the Wetlands Margin is defined as "that area which extends 75 feet from the





wetland boundary or to the limit of the hydric soils, whichever is greater". *(New Comment) The wetland margin shall be delineated on the plan. It is noted that disturbance of the wetland margin is not proposed as shown on the submitted plan. (Previous Comment 6) The wetland margin is now shown on Sheet SP-1. It appears the margin should also be shown on Sheet SP-2.*

6.-8. Previous Comments 7 through 9 satisfied.

9. In accordance with Section 402.6 and Schedule II, a resort requires parking in the amount of the cumulative totals of more specific lodging, recreation, eating and drinking facilities, and other uses.

An inn requires four (4) parking spaces for every three (3) sleeping rooms and the proposed recreation building requires one (1) parking space for every three (3) persons of total capacity or one (1) parking space for every 200 square feet, whichever is greater.

*(New Comment) A parking calculation shall be provided on the plan showing compliance with this Section. Additional parking may be required. Any new parking shall be located 100-feet or greater from the existing property lines per Section 511.1.D of the Zoning Ordinance. (Previous Comment 10) The inn requires 64 parking spaces (48 rooms/3 \* 4 spaces). Fifty-two (52) parking spaces exist. If the Zoning Officer determines the existing use is a Resort and/or a Drug and Alcohol Rehabilitation Center then the inn is a proposed use and the 64 parking spaces required for the inn shall be provided.*

10.-11. Previous Comments 11 and 12 satisfied.

### **SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS**

Waivers from the Subdivision and Land Development Ordinance are requested and are discussed in Comments 18, 21, 37, 38, and 39.

12. In accordance with Section 602.1.F and 603.A.1.A.(12), all submissions to, correspondence with, and approvals/permits from the following agencies shall be provided.

- a. Smithfield Township Sewer Authority *(Previous Comment 14.a) Correspondence from the Sewer Authority indicates sewage planning is not required.*
- b. Brodhead Creek Water Authority *(Previous Comment 14.b) The project is outside of the BCWA's and Delaware Water Gap's jurisdictions and the property will continue to use the existing well.*
- c. Fire Company *(Previous Comment 14.c) Land Development Plans were sent to the Delaware Water Gap Fire Department under cover letter dated March 25, 2025. No response has been received to date.*
- d. Monroe County Planning Commission *(Previous Comment 14.d) Monroe County Planning Commission issued comments dated September 23, 2024.*



- e. Monroe County Conservation District/Pennsylvania Department of Environmental Protection – *Erosion control and NPDES Permit. (Previous Comment 14.e) A technical review dated January 8, 2025 was issued by the County Conservation District.*
  - f. Pennsylvania Department of Environmental Protection – *General Permit 4 (New Comment) A submission was made to PADEP on February 7, 2025.*
13. In accordance with Section 602.1.G, “the applicant/developer shall notify all abutting property owners of the proposed development. This notification shall contain a statement as to the size and scope of the proposed project and the date of the first Planning Commission review of the project. Said notice shall be sent to the mailing address of the abutting property owners as shown on the tax rolls of the Township. A list indicating the names and addresses of the people notified as well as a copy of the letter center, a certification with “return receipt requested” indicating that the letters had been sent, shall be submitted to the Township.” *Notifications to abutting property owners are required. (Previous Comment 11) A list of recipients with a “return receipt requested” for each shall be submitted. (Previous Comment 15) A list of property owners was provided with this submission. The return receipts shall also be submitted.*
14. Previous Comment 16 satisfied.
15. In accordance with Section 603.1.A.(11), “a recent title report shall be submitted verifying any restrictions in the deed affecting the subdivision or development of the property, including, but not limited to, any underground, overhead or surface utility easements or rights-of-way. Copies of easements shall be submitted for review.” *The title report shall be submitted as required. (Previous Comment 13) A copy of the title insurance is provided with this submission. A title report is still required. (Previous Comment 17) The response letter indicates a title report will be submitted under separate cover.*
- 16.-17. Previous Comments 18 and 19 satisfied.
18. In accordance with Section 603.1.D.(1), “a complete outline survey of the property to be subdivided or developed shall be provided, showing all courses, distances, areas and tie-ins to all adjacent intersections. The survey shall not have an error of closure greater than one part in 10,000. Lot closure reports shall be submitted demonstrating the above stated closure requirements.” *The metes and bounds of the existing property shall be provided on Sheet ER-1. (Previous Comment 16) Notes on the plan indicate the boundary was obtained from Lidar and/or deeds of record. (From Previous Comment 20) A partial boundary survey was completed in the area of the proposed recreation building. Notes 2 and 3 on Sheet ER-1 shall be revised accordingly. A waiver from Section 603.1.D.(1) is requested for the partial boundary survey.*
19. In accordance with Section 603.1.D.(4), the plan shall include “the location, name and right-of-way and cartway widths of all streets bordering the land to be developed or subdivided, including State and local traffic route numbers”. *The right-of-way and cartway widths of Mountain Road and Vista Circle shall be provided on Sheet ER-1. (Previous Comment 17) The right-of-way and cartway widths of Mountain Road and Vista Circle shall still be provided on the plan regardless of the roads being private. In addition, the right-of-way and cartway widths along Shepard Avenue and Shepard Court shall also be provided on the plan. (Previous Comment 21) The right-of-way width of Mountain Road shall still be dimensioned on the plan.*





20. Previous Comment 22 satisfied.
21. In accordance with Section 603.1.D.(7), the plan shall include “the location of all existing monuments, iron pipes or pins and spikes relating to the property”. *Existing monumentation shall be shown and labeled on Sheet ER-1. (Previous Comment 19) Notes on the plan indicate the boundary was obtained from Lidar and/or deeds of record. (From Previous Comment 23) A waiver from Section 603.1.D.(7) is requested to not require showing existing monumentation on the plan. Existing monumentation in the area of the partial boundary survey is now shown.*
- 22.-24. Previous Comments 24 through 26 satisfied.
25. In accordance with Section 603.1.G.(17), the Preliminary Plan shall include “a soil erosion and sediment control plan and design basis of surface and subsurface drainage for protection against soil erosion during and after the construction period”. *(From Previous Comment 27) All previous comments have been addressed. A technical review dated January 8, 2025 was issued by the County Conservation District. All submissions to, correspondence with, and approvals from the County Conservation District/PADEP shall also be provided.*
- 26.-30. Previous Comments 28 and 32 satisfied.
31. In accordance with Section 1023.5, “where stormwater or surface water will be gathered within the subdivision or land development and discharged or drained in volume over lands within or beyond the boundaries of the subdivision or land development, the applicant/developer shall reserve or obtain easements over all lands affected thereby, which easements shall be adequate for such discharge of drainage and the carrying off of such water and for the maintenance, repair and reconstruction of the same by vehicles, machinery and other equipment for such purposes, and which shall be of sufficient width for such passage and work. The applicant/developer shall convey, free of charge or cost, such easements to the Township upon demand.” *An access easement shall be provided to permit, but 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. Also refer to Stormwater Management Ordinance Comment 59. (Previous Comment 29) A 20-foot wide stormwater easement is proposed, however its location cannot be identified without a boundary survey. Refer to SALDO Comment 20. If a boundary survey is not completed and the easement cannot be identified with metes and bounds, then we suggest a blanket easement be provided. Regardless of type of easement a note shall be added to the plan to permit, but 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. (Previous Comment 33) A drainage easement with metes and bounds is now shown on the plan. The entire length of the easement to the public right-of-way of Mountain Road shall be shown in plan view. In addition, a closure report shall be submitted for review.*
32. Previous Comment 34 satisfied.
33. In accordance with Section 1101.1.F.(2)(e)(1), “there shall be a minimum of one shade tree and three shrubs proposed for every 30 linear feet of stormwater management facility perimeter”. *The required landscaping shall be placed along the proposed infiltration basin. (Previous Comment 31) A total of 17 shade trees and 50 shrubs are required for the 500-feet of basin perimeter. Fifteen*



*(15) shade trees and 31 shrubs are proposed, therefore two (2) shade trees and 19 shrubs are still required. In addition, the number of 17 TO shrubs is incorrect and shall be revised to propose the number shown in plan view (16).*

*In addition, and in accordance with Section 1101.1.F.(2)(e)(3), "no shrub or tree plantings shall be placed on the top of the berm or within the spillway or the path of the spillway". A proposed tree is located downslope of the proposed spillway and shall be relocated. **(Previous Comment 35) The Planting Schedule lists 15 lv shrubs while the plan shows 16. The Planting Schedule shall be revised for consistency.***

34. In accordance with Section 1202.A, "in conformance with the Pennsylvania Municipalities Planning Code, this Section requires the public dedication of land suitable for park land, noncommercial recreational uses, preserved open space, and the construction of recreational facilities. Upon agreement of the Board of Supervisors, any of the following alternatives may be approved by the Board of Supervisors in lieu of public dedication of land, as specified in this Section:

1. Payment of recreation fees.
2. Construction of recreation facilities.
3. Dedication of recreation land or preserved open space to the Township or its designee.
4. A combination of these alternatives."

*Open space and recreation facilities and/or a fee in-lieu-of shall be provided. **(Previous Comment 36) The response letter suggests a fee in-lieu-of will be provided. The fee shall be calculated utilizing the current fee schedule at the time of plan approval.***

35. In accordance with Section 1301.5.D, "the Board of Supervisors may require the applicant/developer to provide a permanent drainage easement along any watercourse located within or along the boundary of any property being subdivided or developed. The required width of any such easement shall be determined by determining the extent of the width of flow from a fifty-year twenty-four-hour design storm or as determined by one of the following; United States Army Corps of Engineers, Pennsylvania Department of Environmental Protection or other public agency having jurisdiction. The purpose of the easement is to maintain the free flow of the watercourse. The applicant/developer will retain the easement until such time as one of the following is accomplished:

- (1) The easement is offered for dedication by the applicant/developer and accepted by the Township.
- (2) If an easement required by the Township is established, but not to be dedicated, the maintenance shall then be the responsibility of the individual lot owners through whose property the easement passes. For land developments, the maintenance shall then be the responsibility of the applicant/developer.





- (3) A homeowners' association or their legal entity approved by the Township assumes responsibility for the maintenance of the development, including the easements.

*The Applicant shall discuss with the Township a permanent easement along the unnamed tributary to Cherry Creek that traverses the property. (Previous Comment 33) A 20-foot wide drainage easement is proposed along the unnamed tributary to Cherry Creek and is shown on the Site Development Plan (SP-2). The easement shall be shown in its entirety and shall be located by metes and bounds. The easement shall also provide access to the Township from a public right-of-way. The Applicant shall discuss dedication of the easement with the Township. (Previous Comment 37) A drainage easement with metes and bounds is now shown on the plan. The entire length of the easement to the public right-of-way of Mountain Road shall be shown in plan view. In addition, a closure report shall be submitted for review.*

36. Previous Comment 38 satisfied.
37. In accordance with Section 1301.6.B.(5), "the top of the outlet box shall be set at the 100-year water surface elevation and shall have an open grate". *A detail for the proposed outlet structure shall be provided on the plan to determine compliance with this Section. (Previous Comment 34) A waiver from Section 1301.6.B.(5) is requested. An outlet box is not proposed, therefore this comment no longer applies, and the waiver is not required at this time. However, the Design Engineer shall refer to Comment 38 regarding the requirement for a concrete box structure. (Previous Comment 39) A concrete outlet structure is now proposed and the grate elevation is set 0.35-feet above the 100-year high water elevation. A waiver from Section 1301.6.B.(5) is requested.*
38. In accordance with Section 1301.7.L.(1), "all outlet pipes through the basin embankment shall be reinforced concrete pipe with watertight joints". *(Previous Comment 40) A waiver from Section 1301.7.L.(1) is requested to permit the use of HDPE pipe.*
39. In accordance with Section 1301.7.Q.(2), "the minimum diameter of all storm drainage pipe shall be 18 inches or an equivalent thereto. Where headroom is restricted, equivalent pipe arches may be used in lieu of circular pipe". *The proposed storm sewer has diameters of 12- and 15-inches and shall be revised for compliance with this Section. (Previous Comment 41) A waiver from Section 1301.7.Q.(2) is requested to permit the proposed 12- and 15-inch diameter storm sewer.*

40.-41. Previous Comments 42 and 43 satisfied.

#### **STORMWATER MANAGEMENT ORDINANCE COMMENTS**

42.-51. Previous Comments 44 through 53 satisfied.

52. In accordance with Section 229.1, "any earth disturbance must be conducted in conformance with Chapter 102". *(From Previous Comment 54) All previous comments have been addressed. A technical review dated January 8, 2025 was issued by the County Conservation District. All submissions to, correspondence with, and approvals from the County Conservation District/PADEP shall also be provided.*

53.-56. Previous Comments 55 through 58 satisfied.



56. In accordance with Section 233.2.B.(21), the plan shall include “a twenty-foot-wide access easement to and around all stormwater management facilities that would provide ingress to and egress from a public right-of-way as necessary to implement the operations and maintenance (O&M) plan. Alternatively, a blanket easement may be provided by a note on the plan”. *An access easement shall be provided to permit, but 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. (Previous Comment 53) A 20-foot wide stormwater easement is proposed, however its location cannot be identified without a boundary survey. Refer to SALDO Comment 20. If a boundary survey is not completed and the easement cannot be identified with metes and bounds, then we suggest a blanket easement be provided. Regardless of type of easement a note shall be added to the plan to permit, but 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. (Previous Comment 59) A drainage easement with metes and bounds is now shown on the plan. The entire length of the easement to the public right-of-way of Mountain Road shall be shown in plan view. In addition, a closure report shall be submitted for review.*
57. Previous Comment 60 satisfied.

#### **STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS**

59.-70. Previous Comments 61 through 72 satisfied.

71. Stormwater discharges through the emergency spillway during the 100-year storm event. The basin shall be revised to retain stormwater during all storm events. *(Previous Comment 73) The submitted basin design discharges stormwater through the emergency spillway during the 100-year storm event. An Emergency Spillway is defined in the Stormwater Management Ordinance as “A conveyance area that is used to pass peak discharge greater than the maximum design storm controlled by the stormwater facility”.*

*During a phone conversation on April 24, 2025, the Applicant’s Engineer indicated that the basin volume will likely be increased by providing 3:1 slopes inside the basin in order to prevent stormwater from exiting through the emergency spillway during the 1- through 100-year storm events. A waiver from Section 1301.7.F of the Stormwater Management Ordinance will be required. The Section states “The maximum slope of the earthen detention basin embankments should be four horizontal to one vertical. An embankment stability analysis shall be supplied for basins with a proposed slope which exceeds four horizontal to one vertical”.*

72. Riprap is proposed along the stream edge of the unnamed tributary to Cherry Creek as shown in plan view. The stream edge shall be clearly identified in plan view (i.e., top of bank). The Applicant shall address whether permitting from the Pennsylvania Department of Environmental Protection will be required. *(Previous Comment 74) The response letter indicates a PADEP General Permit 4 was submitted for review.*
73. Previous Comment 75 satisfied.





### **MISCELLANEOUS COMMENTS**

74.-76. Previous Comments 76 through 78 satisfied.

### **PLAN REVISION COMMENTS**

77.-81. Previous Comments 79 through 83 satisfied.

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 Smithfield Township, prior to approval of the Preliminary 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 regarding the above comments, please call me.

Sincerely,

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

JST/meh

cc: Julia Heilakka, Manager – Smithfield Township  
Ronold J. Karasek, Esquire – Smithfield Township Solicitor  
Matthew Helbers, Bureau Veritas – Smithfield Township Zoning Officer  
James P. Kelley, P.E., Barry Isett & Associates, Inc. – Applicant's Engineer  
Collin Stout, E.I.T., Barry Isett & Associates, Inc. – Applicant's Engineer  
Lance Pulse, Water Gap Acquisitions Partners, LLC – Applicant/Property Owner  
Allisen Trotter, Manager – Delaware Water Gap Borough  
Kristina Heaney, District Manager – Monroe County Conservation District  
Melissa E. Hutchison, P.E. – T&M Associates