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October 19, 2026

Christine Meinhart-Fritz
Monroe County Planning Commission
701 Main Street, Suite 405
Stroudsburg, PA 18360

SUBJECT: Review of the Land Development application for Westfield Commons, Smithfield Township, Monroe County, PA.

Dear Ms. Meinhart-Fritz:

Westfield North LLC is proposing to construct new apartments known as Westfield Commons in the ED zoning district of Smithfield Township. The 9.62-ac project parcel is located at the intersection of SR 447 (Independence Road) and Franklin Hill Road (T-659) and is presently wooded and undeveloped.

The project proposes 160 new apartment units as part of a high density residential development. The development includes two 4-story apartment buildings, 245 parking spaces, driveways, stormwater management, landscaping, utilities, and other related infrastructure. The apartments will be served by central water from the Brodhead Creek Regional Authority and central sewer from Smithfield Sewer Authority.

The project also includes the realignment of Franklin Hill Road, which presently intersects SR 447 at a severe angle approximately 500-ft east of the project. The realignment will turn Franklin Hill Road to instead intersect SR 447 at a 90° angle directly across from the Franklin Hill Lane entrance to East Stroudsburg Elementary. The applicant states that the road realignment will be located on Smithfield Township's 1.4-ac parcel immediately to the east of the project parcel.

The existing on-site topography is complex with several high points, ridges, and valleys directing runoff off-site at several locations along the SR 447 property line and the southwestern property line. As a result, the stormwater management design is equally complex, including a combination of infiltration basins, dry extended basins, a subsurface infiltration bed, a vegetated swale, water quality filters, and street sweeping.

The Franklin Hill Road realignment encroaches within a delineated wetland area, and wetland mitigation is also proposed as part of the stormwater management design to offset the proposed wetland disturbance.

We received by email the following for review as prepared by UTRS Civil and Environmental Engineering:

- MCPC application/checklist
- Final Land Development drawings
- Two Stormwater Management Ordinance Waiver Requests
- Zoning Hearing Board Variance Decision (05/10/23)
- Relative Deeds and Title Policy
- Stormwater Report
- Wetland report
- PNDI and USFW Response Letters

We reviewed the application in regard to general engineering & planning and for potential impact to Monroe County and offer the following:

ZONING AND COMPATIBILITY WITH SURROUNDING USES

1. It appears the project is a Principal Permitted Use in the ED zoning district.
2. A clear statement of intent/use should be included on the land development drawings including both the development of the proposed apartments as well as the realignment of Franklin Hill Road.
3. Multiple variances were granted in May 2023 providing relief from parking setback requirements, minimum first floor building height, minimum parking space size, and number of parking spaces per dwelling unit.
4. Multiple modifications to the SALDO were requested for the combination of preliminary/final land development submission, woodland disturbance over 1-ac, steep slope disturbance, providing a single public street entrance, parking requirements, crosswalk and sidewalk requirements, and landscape requirements.
5. Modifications to the SMO are also requested for the Franklin Hill Road realignment work proposed within the inner and outer buffers to the wetland.
6. The parcel abuts an R-1 residential zoning district and residential uses to the west, south, and east. Adequate buffers and screening should be provided.
7. General Note 2 from Sheet C.EX.01 should also be included on Sheet C.C.02. It is our understanding, based on a statement from the Stormwater Report, that the Franklin Hill Road realignment parcel is currently being subdivided. The proposed lot lines shown on the plans differ from the existing lot layout currently provided in the tax mapping. We suggest adding a similar statement referencing the subdivision to the plans for clarity.
8. All related zoning and land development aspects should be reviewed by the Municipality for compliance with applicable ordinances.

WATER SUPPLY, SEWAGE DISPOSAL AND UTILITIES

9. The facility will be served by central water from Brodhead Creek Regional Authority & central sewer from Smithfield Sewer Authority. Adequate capacity, approval, and authorization from applicable utilities should be provided as required.
10. An existing sewer main runs along the southern (project) side of SR 447. Sewage from the project is collected by gravity and routed to an existing manhole along the sewer main.
11. An existing water main appears to run within the westbound lane of SR 447.
12. Profiles are provided for the proposed sanitary sewer line and water service line. We offer the following:
    a. All utility crossings should be shown in the Waterline and Sanitary Sewer Profiles and should include vertical separation distances for all utility crossings.
    b. The connection locations of the water service laterals to the buildings should be clearly identified in the Waterline Profile.
    c. The connection locations of the sewer service laterals to the buildings should be clearly identified in the Sanitary Sewer Profile.
    d. The sanitary sewer line between MH 2 and MH 3 is sloped at 0.5%. The applicant should consider increasing the slope of this sewer line to prevent clogging.

13. A waterline is proposed to cross beneath a sanitary sewer line approximately 20' from MH 1. The minimum vertical separation between the top of the waterline and bottom of the sewer line should be reconciled between the notes in the Water and Sewer Line Crossing detail on Sheet C.UT.02 and the Utility Crossing <18" Clearance detail on Sheet C.UT.03.
14. Utility crossing details are included across all 3 provided utility detail sheets. We recommend showing all necessary utility crossing details on the same sheet to prevent confusion and the possibility of something being missed or overlooked during construction.
15. Several sewer details are quite blurry and require zooming in on the digital file to read. Cleaner details should be considered to ensure clarity on printed drawings.
16. Separation distances between the sanitary sewer line and Inlet 5-5 as well as the fire hydrant at the termination end of the water service line should be reviewed for adequacy.
17. Adequate fire protection, fire hydrant locations, internal sprinkling, external fire department connections, etc. should be reviewed by the Municipality and the serving fire companies.
18. PennDOT Highway occupancy permits for the utilities should be secured as required.
19. No site lighting is proposed. Proposed site lighting should be provided and reviewed by the Municipality for compliance with applicable municipal ordinances.
20. Electric service is not addressed.
21. Additional labeling and identification of both existing and proposed features should be added to the Utility Plan.

ACCESS, PARKING & TRAFFIC

22. Access will be from a proposed drive onto the realigned portion of Franklin Hill Road, and a waiver is being requested to reduce the number of required access drives from two down to one.
23. A Turning Movement Plan was provided demonstrating an emergency vehicle's ability to maneuver through the project site.
24. PennDOT Highway occupancy permit(s) for the realignment of Franklin Hill Road and related work/improvements within the PennDOT right-of-way should be secured as required.
25. A traffic study or traffic analysis was not submitted. A traffic analysis should be provided and reviewed by the Municipality and PennDOT for potential traffic impacts to local roads.
26. Five foot wide walkways are proposed along the front of the apartment buildings for pedestrian access, and several hatched pedestrian crosswalks are also proposed from the walkways through the parking lots. There is an existing gravel trail along the parcel's SR 447 property line, and a walkway is proposed connecting the proposed parking lot to the existing gravel trail.
27. Pedestrian access, internal pedestrian circulation, sidewalks and crosswalks should be reviewed for safety, and handicap parking requirements and accessible routes should be evaluated for compliance with ADA requirements.
28. The site layout, emergency access, fire hydrants, etc. should also be reviewed by the serving fire company.
29. The Municipality should review whether the access drive should be named and have appropriate signage.
30. Stubbed driveways are proposed on each side of the proposed buildings. The purpose of these driveways should be clearly labeled on the plan, and "no parking" signs should be considered.
31. The required number of parking spaces, parking dimensions, aisle widths, orientation, and related features should be reviewed by the Municipality for compliance with applicable zoning and parking requirements.

STORMWATER MANAGEMENT

32. The existing topography is complex with several on-site high points, ridges, and valleys draining to three different subareas of the Brodhead/McMichaels Creek watershed. As a result, the stormwater management design is equally complex.

    The proposed stormwater management system includes 1 subsurface infiltration bed, 2 surface infiltration basins, 2 dry extended basins, 1 vegetated swale, water quality filters, and street sweeping. Stormwater collection and routing will be from a series of proposed inlets, manholes, storm pipes, riprap aprons, headwalls, etc. located throughout the project. It appears that 6 points of interest were evaluated for stormwater management, four along SR 447 and two along the southwestern property line.

    The Franklin Hill Road realignment encroaches within a delineated wetland area, and wetland remediation is also proposed as part of the stormwater management design to offset the proposed wetland disturbance.

33. Water quality filters are proposed in 2 of the proposed inlets. Additional snouts or other protection measures should be provided in Inlets 1-2 & 5-4, Outlet Structures 3-2 & 5-12, and Manholes 5-7 & 5-10 to protect the underground systems from clogging due to build-up of sediment and debris.

34. Profiles are provided through all proposed inlets, manholes, and storm piping. We offer the following:

    a. Relevant proposed ground surface elevations, such as top-of-berm and pond floor elevations, should be provided in the profiles.

    b. All utility crossings should be provided in the Storm Sewer Profiles.

    c. Two profiles are labeled with the same name on Sheet C.PST.01.

35. It would be helpful if each run of storm pipe, such as from Inlet 5-8 to Inlet 5-9A, was labeled with its own unique identifier and provided consistently across the plan views, profiles, and details.

36. It would be helpful in the outlet structures were clearly identified on PCSM Plan to distinguish between standard inlets.

37. Additional labeling of proposed contours should be provided on all PCSM Plans.

38. It should be confirmed that discharge at all points of interest is directed to stable flow paths.

39. Downspout locations and roof drain piping should be provided on the plans.

40. A table is provided on the PCSM Overall plan (Sheet C.PC.01) with soil testing information. We offer the following:

    a. The table includes TP-7A and TP-7B within a spray irrigation stormwater facility. These test pits and the spray irrigation area are not shown on the drawings.

    b. The table includes A/B test pits for each test pit number (e.g. TP-1A & TP-1B); however, the PCSM Overall plan only shows a single test pit location for each number (e.g. TP-1). All testing locations should be shown on the plans.

    c. Infiltration testing locations were not provided.

    d. The test pit existing ground surface elevations provided in the table do not appear to match the ground surface elevations at the test pit locations shown on the plan. The plan and the table should be coordinated for consistency.

    e. The infiltrative surface elevations of the proposed SCMs should be reviewed against the limiting zones of the soil testing. The bottoms of Infiltration Bed 5 and Infiltration Basin 1 appear to be either within the required 2' separation to limiting zone or below the limiting zone based on the elevations provided in the table.

41. The slope of the proposed storm pipes should be limited to 10%. For pipes exceeding 10%, additional support or anchoring should be provided as required by the manufacturer for stability.
42. The PCSM BMP O&M references constructed filters in the infiltration basins. Constructed filters should be identified on the plans and details should be provided.
43. Grading behind the eastern apartment building does not tie into existing grade on the west side of the proposed cut.
44. The western apartment building straddles an existing on-site valley, which requires more than 20' of fill below the first floor elevation. A geotechnical evaluation should be provided to verify stability beneath the building.
45. The outlet pipe for Subsurface Infiltration Bed 5, located between Outlet Structure 5-12 and Manhole 5-13, passes beneath the western apartment building almost at the building's midpoint. This places the outlet pipe more than 20' below final grade. It appears the location of this storm pipe was chosen as it allows the pipe to be placed along the existing grade, in an area of significant fill, whereas routing the pipe around the building would require deep excavation to place the trench.

    Inlet 5-2 is designed to be the emergency spillway for Infiltration Bed 5. In the event that the outlet pipe beneath the building collapses or becomes otherwise obstructed, stormwater from Subsurface Infiltration Bed 5 would begin discharging to Vegetated Swale 3 via Inlet 5-2. This would redirect outflow from the point of interest at the southern property line to a point of interest along the northern property line along SR 447, changing the hydrologic design of the site.

    Because access to repair the outlet pipe beneath the building would be challenging due to its depth and placement, we recommend applicant consider installing a redundant outlet pipe from Outlet Structure 5-12 and Manhole 5-13. Increasing the size of the outlet pipe (and redundant pipe) should also be considered.
46. Sheet C.PC.02 appears to show the grate for Outlet Structure 3-2 on the opposite side of the curb from the parking area.
47. A separate drawing is referenced for the details for Infiltration Bed 5. The referenced plan was not provided and not reviewed. The referenced plan should be included with the land development plan set or additional information regarding Infiltration Bed 5, such as infiltrator size, stone bedding, geotextiles, etc. should be added to the details drawings.
48. Additional dimensional and elevation labeling should be added to the underground dry extended basin details.
49. Earth disturbance is identified to be 10.4-ac requiring an NPDES permit. The NPDES permit and the E&S Plan should be reviewed by the MCCD for adequacy.
50. Proposed stormwater management should be reviewed by the Municipality for compliance with applicable requirements.
51. A Chapter 105 Joint Permit is required for the wetland encroachment and should be reviewed by PA DEP.

GENERAL AND OTHER CONCERNS

52. A PNDI dated 05/28/26 was provided, including multiple potential impacts, along with correspondence from US Fish and Wildlife Service. The required PNDI avoidance measures are noted on the PCSM and E&S drawings.
53. A snow management plan with snow storage locations should be considered.
54. A signage plan should be provided to clearly show project identification, advertising, directional, pedestrian, and informational sign locations.

55. Emergency evacuation plans with staging areas for occupants should be considered and coordinated with emergency officials.
56. All existing and proposed feature line work, hatching, symbology, points, etc. should be clearly identified in the legend and/or labeled on the drawings.
57. Steep slope hatching overlayed on the aerial photo is difficult to parse out on the Existing Features & Site Analysis Plan. An alternative hatching scheme or an existing features plan omitting the aerial photo should be considered.
58. Existing natural features on-site include steep slope areas, wooded areas, and wetland areas. The existing features should be reviewed with regard to municipal restrictions and buffers.
59. Landscape plans were provided. Proposed landscaping should be reviewed by the Municipality for compliance with applicable requirements.
60. Drawings intended to be recorded should be clearly identified on the drawings.
61. Adjoining property owner information should be verified for consistency with current tax mapping.
62. It would be helpful if the apartment buildings were labeled with their own unique identifiers.
63. The number of handicap parking spaces should be reconciled in the notes on Sheet C.C.02.
64. The E&S Plans and Sequence of Construction should include safety and preservations measures for the maneuvering of equipment and work done beneath the existing overhead powerlines traversing the site.

The approval of this plan is recommended conditioned on satisfactorily addressing the comments herein, approval by the municipality and approval by applicable outside agencies.

If you have any questions, please contact me.

Very truly yours,

Samantha L. Jescovitch

Samantha L Jescovitch, P.E.

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