



March 6, 2025

Mr. E. Jean Krack
Borough Manager
Borough of Phoenixville
351 Bridge Street, 2nd Floor
Phoenixville, PA 19460

**RE: Preliminary/Final Lot Consolidation and LD Application – Review #3
133-137 High Street (UPI #15-5-519 & 15-5-520)
Borough of Phoenixville
RVE File #PCPBP162**

Dear Jean:

Remington & Vernick Engineers (RVE), on behalf of the Borough of Phoenixville, has reviewed the following submission materials in connection with the application referenced above:

- Plans entitled “Preliminary/Final Land Development Plan of 133-137 High Street” (6 sheets), dated 4/22/2024, last revised 2/20/2025, prepared by Hopkins and Scott, Inc. of Phoenixville, PA.
- Response Letter to RVE Engineers Review Letter, dated 2/11/2025, prepared by Hopkins and Scott, Inc. of Phoenixville, PA.
- Waiver Requests, dated 2/11/2025, prepared by Hopkins and Scott, Inc. of Phoenixville, PA.
- Narrative & Stormwater Management Report for Good Samaritan Services, 133-137 High Street, dated 4/24/2024, last revised 2/20/2025, prepared by Hopkins and Scott, Inc. of Phoenixville, PA.
- Parking Narrative for Good Samaritan Services 133-137 High Street, dated 1/10/2025, prepared by Good Samaritan Services of Phoenixville, PA.
- Response Letter to Gilmore Associates Review Letter, dated 2/11/2025, prepared by Hopkins and Scott, Inc. of Phoenixville, PA.

I. GENERAL INFORMATION

Owner & Applicant: Good Samaritan Services
P.O. Box 551
Phoenixville, PA 19460
(888) 477-0025
Attn: Nate Hoffer
nateh@goodsamservices.org

Plan Preparer & Surveyor: Hopkins and Scott, Inc.
207 Franklin Avenue
Phoenixville, PA 19460
(610) 933-1754
Attn: Jerry L. Miller, P.L.S.
hasland@verizon.net

Proposal: The proposed development consolidates two (2) existing parcels, remove three (3) small dwelling units and replace them with one (1) dwelling unit with sixteen (16) bedrooms for short term housing. This project also includes grading, utilities, stormwater management and erosion control.

II. COMMENTS

Upon review of this submission, RVE has the following comments. Any underlined comments must be addressed by the applicant prior to approval.

1. Add a note to the plans that the Borough is granted a blanket easement to enter the site and inspect the stormwater BMPs (§23-402.2.B(18)(c)[2]). *Item satisfied.*
2. Add a statement signed by the owner that shall prohibit any revision to the approved SWM plan unless approved by the Borough in writing (§23-402.2.A(3)). *Item satisfied.*
3. ~~The area of the Stone Trench shall be protected from compaction by construction equipment during construction. A tree protection fence or other means shall be provided on the plan. (§23-306.1.L)~~ *The applicant has revised the plan and is not currently proposing any infiltration facilities. This comment is no longer applicable.*
4. Provide infiltration testing at the site of the proposed Stone Trench to determine that this method of stormwater management is appropriate and that limiting zones are not encountered (§23-306.I). *The applicant has not performed infiltration testing.*
5. The property owner shall sign and record an Operations and Maintenance Agreement with the Borough (§23-402.2.F(2)). *Owner will execute a Stormwater Management O&M Agreement once design is approved by Engineer. The Applicant has acknowledged this requirement.*
6. Provide specific dust control measures (PADEP Erosion and Sediment Pollution Control Program Manual – Appendix H). *Item satisfied.*
7. Provide final as-built plans of all BMPs and stormwater conveyance and facilities (§23-502.1). *On the Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan (Sheet 1), the applicant has added a note indicating that as-built plans will be provided after construction. Item satisfied.*
8. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – Sheet Index – Sheet 2 – change UTILITIES to UTILITY PLAN. *Item satisfied.*
9. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – Sheet Index – Sheet 4 – after NOTES add SHEET. *Sheet 4 is now only labeled “Details” and Sheet 5 labeled as “Notes.” These need to be labeled as “Details Sheet” and “Notes Sheet” respectively. The plan sheet titles are consistent with the sheet index. Item satisfied.*
10. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – Sheet Index – Sheet 5 – remove / DEFINITIONS. *Item satisfied.*

11. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – Show existing features (buildings) within 50 feet of the tract boundary. *Item satisfied.*
12. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – provide a title for the plan view on the left (stormwater and layout?). *Item satisfied.*
13. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – provide a parking analysis (§22-304.2.A). Use the ITE Parking Generation Manual or another appropriate source to display a parking calculation listing the proposed use/units along with the proposed amount of parking spaces. The parking analysis should show existing and proposed conditions. (§27-405). *The applicant has provided a parking memorandum, dated 8/21/2024, stating that, “in (their) 20 years of operation...(they) have never had more than 3 residents who owned a vehicle at any given time.” The applicant is proposed to provide off-site parking spaces at their nearby 104 High Street property. The applicant should revise their memo to indicate the existing resident capacity that resulted in parking demand of 3 parking spaces. Based on this information, the parking demand for a new facility with 16 residents can be easily determined. If the applicant has excess parking available at a nearby location, provide a statement in the memo indicating the excess parking spaces available at the location. Also, please include parking spaces used by staff. Item satisfied.*
14. ~~On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – plan view left – show a twenty five (25) foot offset line from the infiltration BMP. Any infiltration practice within twenty five (25) feet of a building or other feature with subgrade elements shall incorporate vertical impermeable barriers for protection. (§23-306.1.J(2)). The applicant has revised the plan and is not currently proposing any infiltration facilities. This comment is no longer applicable.~~
15. ~~On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – provide specifications for the ‘rubberized membrane’ noted on the plan. The applicant has revised the plan and is not currently proposing any infiltration facilities. This comment is no longer applicable.~~
16. ~~On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – LEGEND – show the rubberized membrane symbol. The applicant has revised the plan and is not currently proposing any infiltration facilities. This comment is no longer applicable.~~
17. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – call out a description for the yard drains – diameter, material, etc. *The applicant has provided a yard drain detail, but the detail should also indicate information regarding the yard drain material, grate material, etc. Relocate stormwater details and notes to a separate Post Construction Stormwater Management Plan sheet. Item satisfied.*
18. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – remove the Owen M. Hyne signature block certifying that the SWM Site Plan meets all design standards etc. *Item satisfied.*
19. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – add the Recorder of Deeds block that is attached to this review letter. *Item satisfied.*

20. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – provide monumentation for the consolidated lot boundary (§22-406.1). *Property corners and concrete monuments to be set as shown on Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan). Iron Pins to be set where concrete monuments can not be set. Item satisfied.*
21. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – the proposed building is attached to an adjacent building. Use the “Attached” requirements for the zoning district. *Item satisfied.*
22. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – the proposed building shall not extend into the roadway Right-of-Way. *The applicant has shifted the front of the proposed building behind the legal right-of-way line. Item satisfied.*
23. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – an encroachment easement shall be displayed for the proposed porch encroaching into the roadway Right-of-Way. *Item satisfied.*
24. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – display the location for the storage of trash. Provide a concrete pad for the trash area. Update the impervious area and zoning calculations accordingly. *The applicant has indicated the location of solid waste storage on the plan and has indicated that the area will be pavers. Item satisfied.*
25. On Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan) – the area between the back of curb to the sidewalk shall be lawn, add a label for the proposed lawn area. *The applicant notes that the area is already labeled. The labeling is shown on the Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan (Sheet 1). Also add labeling of lawn areas to the Grading / E&S / Utility Plan / Landscaping Plan (Sheet 2). Item satisfied.*
26. On Plan Sheet 2 (Grading / E&S / Utility Plan) – show the location of the 8” compost filter sock. *Item satisfied.*
27. On Plan Sheet 2 (Grading / E&S / Utility Plan) – show the location of the topsoil stockpile. *Item satisfied.*
28. On Plan Sheet 2 (Grading / E&S / Utility Plan) – show the location of tree protection fence. *Item satisfied.*
29. On Plan Sheet 2 (Grading / E&S / Utility Plan) – list the Limit of Disturbance in square feet. *Item satisfied.*
30. On Plan Sheet 2 (Grading / E&S / Utility Plan) – Construction Sequence – include the stone trench compaction protection fence, tree protection fencing, etc. *The applicant has revised the plan and is not currently proposing any infiltration facilities. Tree protection fence added to construction sequencing. Item satisfied.*

31. On Plan Sheet 3 (Existing Conditions / Demo Plan) - provide a statement on the plan regarding the presence, or not, of freshwater wetlands as determined by the criteria of the U.S. Army Corps of Engineers (§22-304.2.A). *Item satisfied.*
32. On Plan Sheet 3 (Existing Conditions / Demo Plan) – list the FEMA zone(s) (§22-304.2.A). *Item satisfied.*
33. On Plan Sheet 4 (Details Sheet) – Standard Construction Detail #4.1 – remove one – there are two details. *Item satisfied.*
34. On Plan Sheet 4 (Details Sheet) – Standard Construction Detail #4-20 – replace the detail with one for a circular yard drain without ponding areas. *The applicant has provided a yard drain detail, but the detail should also indicate information regarding the yard drain material, grate material, etc. Relocate stormwater details and notes to a separate Post Construction Stormwater Management Plan sheet. Item satisfied.*
35. On Plan Sheet 4 (Details Sheet) – provide a detail for the retaining wall. *The applicant notes that retaining wall plans will be provided by others. If the retaining wall is in excess of 4' high, then detailed design, structural calculations, and fall protection must be provided. If the retaining wall will be in excess of 4' high, provide a note on the plan stating that "Detailed retaining wall plans and structural calculations shall be submitted to the Borough Engineer for review and approval prior to construction."*

Revise the Paver Wall detail to show how the fall protection will be constructed. Fall protection (min. 42" high) is required for any wall with a height in excess of 30".
36. On Plan Sheet 4 (Details Sheet) – provide a detail for the yard drains. *The applicant has provided a yard drain detail, but the detail should also indicate information regarding the yard drain material, grate material, etc. Relocate stormwater details and notes to a separate Post Construction Stormwater Management Plan sheet. Item satisfied.*
37. On Plan Sheet 4 (Details Sheet) – provide a detail for the garden wall. *The applicant has provided a detail for a retaining wall. However, proposed grading in the area shows the wall with a height ranging from 2.5' to 4.16' and the detail found on Sheet 4 shows a 2' high wood landscape tie retaining wall. On the Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan (Sheet 1), the proposed retaining wall is labeled as being 3' high. Revise plans and details for consistency. If the retaining wall is in excess of 4' high, then detailed design, structural calculations, and fall protection must be provided.*

The applicant has revised the plans to show a 30" high typical wall with a 48" high wall in some locations. However, detailed design and structural calculations are required for the 4' high wall. Fall protection (min. 42" high) is required for any wall with a height in excess of 30".
38. On Plan Sheet 4 (Details Sheet) – provide a detail for the Rain Barrel / Downspout / Stone Trench Piping that will fill the barrel first and then feed the stone trench. *Revised SWM. New detail added to Plan Sheet 1 (Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan). Relocate stormwater details and notes to a separate Post Construction Stormwater Management Plan sheet. Item satisfied.*

39. Provide a landscaping plan (§22-304.2.A & §22-428.1.A). *Showing bushes as buffering/screening of utilities and on top of retaining wall. Street trees and bushes details on Plan Sheet 5 (Notes Sheet). The landscaping plan shall be prepared by a certified planting professional. The applicant is requesting a waiver from this requirement.*
40. ~~Any infiltration practice within ten (10) feet of a building or other feature with subgrade elements shall require certification from a licensed professional indicating that the foundations are adequately designed for this condition. (§23-306.1.J(2)).~~ *The applicant has revised the plan and is not currently proposing any infiltration facilities. This comment is no longer applicable.*
41. Postconstruction peak flow rates from any regulated activity shall not exceed the predevelopment peak flow rates as shown for each of the design storms specified in Table 308.1. (§23-308.1.A). A ‘small difference’ over the existing runoff is not acceptable. Redesign the stormwater management facility. The revised storm calculations by Hopkins and Scott still show an increase in runoff. The new calculations are still unacceptable, and the stormwater management facility needs redesigning.
- Provide information in the report outlining the calculation methodology to justify the proposed design. The report shall include the drainage area calculations, hydrographs, etc. (§23-309).
42. This project is subject to the Infill Development Standards (§27-301.1.A). *The applicant has acknowledged this item and has noted this on the Zoning Requirements table. Item satisfied.*
43. Show connection of the stormwater basin outflow pipe to the existing stormwater drainage main. Run additional storm pipe as necessary in High Street to connect to the existing stormwater main. Provide a separate Stormwater Management Plan sheet to help reduce the amount of information shown on Sheet 1. The plan shows stormwater discharging from a pop-up emitter along High Street. There is an existing storm inlet at the intersection of High Street and Railroad Street, approximately 65’ away from the proposed pop-up emitter. Provide a stormwater connection to the existing storm inlet.
- The plan has been revised to provide for level spreaders in the landscape areas between the proposed porch and sidewalk. Discharge from the level spreader could pose icing conditions. Additionally, the downspout connections to the proposed level spreaders conflict with proposed landscaping. The plan shall be revised to provide for connection to the existing storm inlet.
44. The portion of the property within the road right-of-way shall be offered as Fee Simple Dedication to the Borough. Provide a legal description for the Fee Simple Dedication area. Provide a legal description for the new consolidated lot, less the Fee Simple Dedication area. Revise the Zoning Calculations listed on Sheet 1 to reflect the change in the lot due to the aforementioned Fee Simple Dedication. *The applicant has provided a legal description for this area. RVE will provide any comments related to this legal description under separate cover. Item satisfied.*

45. The land development plans and stormwater reports are engineering work which must be signed and sealed by a licensed professional engineer. The plan preparer states that Pennsylvania permits a land surveyor to design stormwater management features (a.k.a. “storm water land survey”). However, the law delineates that a professional engineer is required for work involving engineering judgement. It is our determination that the stormwater management design for this project requires engineering judgement (i.e. complex recharge bed, complex stormwater O&M requirements). *Plan* *The applicant states that they will retain a professional engineer for this work. Item satisfied.*
46. *Due to the amount of information being presented, it is difficult to read Sheet 1. Revise Sheet 1 to only include site layout and consolidation information. Relocate stormwater plan information, details and notes to a separate Post Construction Stormwater Management Plan sheet. Item satisfied.*
47. *The new porch planned for the front of the proposed building will encroach into the legal right-of-way of High Street. The applicant is proposing to obtain an encroachment easement agreement from the Borough for the construction of the new porch. Provide an exhibit plan and legal description for the proposed encroachment easement agreement. The applicant has provided a legal description for this area. RVE will provide any comments related to this legal description under separate cover. Item satisfied.*
48. *On the Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan (Sheet 1), Parking Notes, modify parking demand calculations to be consistent with the information presented in the parking memorandum, as modified per comments in this letter. Item satisfied.*
49. *On the Layout Plan / Reverse Subdivision Plan / Stormwater Management Plan (Sheet 1), the proposed walkway along the west side of the site connects to a patio paver area. However, the limits of concrete and pavers should be clearly delineated on the plans with a hatch or clearly identified boundaries. Item satisfied.*
50. *The plan shows an underground cistern. Provide pre-treatment upstream from the cistern to prevent entry of sediment or debris. Pre-Treatment should include sumps and snouts or equivalent on any upstream storm inlets and leaf screens on downspouts. Item satisfied.*
51. *Providing for infiltration consistent with the natural hydrologic regime is required to compensate for the reduction in the recharge that occurs when the ground surface is disturbed, or impervious surface is created or expanded (§23-306). The applicant is requesting a waiver from this requirement.*
52. *On the Stormwater Management Plan (Sheet 3), provide a detail for the proposed level spreaders.*
53. *On the Grading / E&S / Utility Plan / Landscape Plan (Sheet 2), proposed landscaping is shown in conflict with the downspout connections to the level spreader. The locations shall be revised.*
54. *On the Stormwater Management Plan (Sheet 3), the height of the cistern referenced in the Storage Tank/Yard Drain #2 detail does not correspond to the elevations provided. It appears that the dimensions provided for the pre-cast concrete cistern are exterior dimensions. Add interior dimensions to demonstrate that the cistern will be consistent with the proposed design elevations.*

55. On the Layout Plan/Reverse Subdivision Plan, Parking Notes, Note 2, cites ITE Land Use 221 which describes a residential building with between 4 and 10 floors of residence that contain at least one dwelling unit with 2 or more bedrooms. ITE Land Use 220 is appropriate for a residential building with 2 or 3 floors of residence that contain at least one dwelling unit with 2 or more bedrooms. Per ITE, the parking demand for Land Use 220 is 1.27 spaces per dwelling unit. Revise Note 2 and parking demand calculation for accuracy.
56. On the Stormwater Management Plan (Sheet 3), Yard Drain #2/Access Hole, confirm whether the proposed PIG Adjustable Storm Drain Frame with Replaceable Filter will conflict with the proposed low volume float and alarm equipment in the same structure. Consider relocating Yard Drain #2 north of the cistern (with the filter) and making the “Access Hole” over the cistern a dedicated access with a solid cover (not an inlet that would require a filter).
57. On the Stormwater Management Plan (Sheet 3), revise the cistern detail to show stone subbase (6” PennDOT #2A) placed beneath the cistern.
58. On the Details (Sheet 5), the Paver Wall Detail shows a 4” dia. toe drain that’s proposed to be vented to daylight. This drain is shown below the bottom grade of the wall and it’s not clear where it would be discharged on this site.

III. WATER SEWER COMMENTS

Upon review of this submission, RVE has the following comments. Any underlined comments must be addressed by the applicant prior to approval.

1. Provide a letter indicating the availability of public sanitary sewer service from the Borough of Phoenixville (§22-424.1.B). This letter must be provided prior to Council consideration. The Borough will not issue any will serve letters until after an exemption status letter has been issued by PA DEP. Once a public sewer will serve letter has been issued, the applicant shall provide a copy to RVE.
2. Provide a letter indicating the availability of public water service from the Borough of Phoenixville (§22-425.2). This letter must be provided prior to Council consideration. The Borough will not issue any will serve letters until after an exemption status letter has been issued by PA DEP. Once a public water will serve letter has been issued, the applicant shall provide a copy to RVE.
3. Add the following note to the utility plan: “All internal water and sewer lines are considered private and subject to compliance with the Borough Plumbing Code.” *Note was stated to be provided on Grading Plan Sheet 2. Note could not be located as stated. Above title block and construction sequence other notes: Sheet 2. Item satisfied.*
4. Specify the sizes and materials of construction of the existing water and sewer mains on the Utility Plan. To be provided in future submission.
5. Specify the sizes and materials of construction of the proposed service connections on the Utility Plan. To be provided in future submission.

6. Include calculations to support sizing of water services and sewer laterals. Note that the Borough's standard details are intended mainly for residential connections and that multi-family buildings may require larger services and laterals. To be provided in future submission.
7. The matter of sewer and water tapping fees shall be coordinated directly with the Borough. *Applicant acknowledged.*
8. Replace all water and sewer details with Borough Standard Details. *Item satisfied.*
9. RVE reviewed the Sewage Facilities Planning Module Application Mailer that was provided by Hopkins & Scott and the Borough has signed the mailer application. In January 2025, RVE submitted the mailer application to PA DEP. Once PA DEP issues an exemption status letter, the applicant shall forward a copy to RVE. This comment will remain until planning has been approved by DEP.

1. # of EDUs	8
2. Sewage Flows	1838.5 gpd
3. Existing (connection only)	checked
4. Name of existing system being extended	Borough of Phoenixville
5. Interceptor Name	French Creek II Interceptor
6. Treatment Facility Name	Borough of Phoenixville WWTP
7. NPDES Permit	PA0027154
8. Section 8a.	Provide answer

IV. REQUESTED WAIVERS

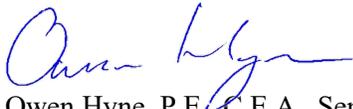
The Applicant has requested the following waivers:

1. ~~23-306-C.1~~ §23-306 (Infiltration Requirements) – Existing adjoining owners dwelling and proposed dwelling within 25' isolation distance from infiltration practices. Using option 23-306-C.2 for runoff volume required as in 23-305, options may include, but are not limited to; reuse, evaporation, transpiration, and infiltration. Capture and reuse the difference of pre-post development 100-Year runoff of stormwater with 50 gallon rain barrel and 2,000 gallon underground storage tank (cistern) with piping into the building for non-potable water for use inside the building for flushing toilets. *Conditioned on the applicant retaining a licensed professional engineer to perform the design of all stormwater improvements and making a direct connection to existing storm sewer, RVE has no objection to this waiver request.*
2. 22-502.1.A (Landscaping Plan by Certified Planting Professional) – Due to the size of the project and limited areas to plant, we are asking for a waiver from having a certified planning professional design the landscaping for this project. We are showing landscaping and details in the plan set designed by Hopkins and Scott, Inc. Professional Land Surveyors. Street tree, buffers/screening of utilities. *RVE has no objection to this waiver request.*

RVE's recommendation for approval is contingent upon the applicant satisfactorily addressing each underlined comment and submitting revised plans and other materials. In conjunction with any resubmission, the applicant must provide a response letter using the same numbering system explaining how each underlined comment has been satisfactorily addressed.

Should you have any questions, please feel free to contact our office at (610) 940-1050.

Sincerely,
REMINGTON & VERNICK ENGINEERS
By



Owen Hyne, P.E., C.E.A., Senior Associate
Borough Engineer

OMH/lmc/er

cc: Good Samaritan Services (via email)
Hopkins and Scott, Inc. (via email)
David Boelker, Borough of Phoenixville, Dir. of Planning & Code Enforcement (via email)
Scott Denlinger, Esq., Wisler Pearlstine, LLP
Judith Stern Goldstein, R.L.A., Gilmore & Associates, Inc.
Christopher J. Fazio, P.E., C.M.E., Executive Vice President (via email)
Leanna M. Colubriale, P.E., C.F.M., Senior Associate (via email)
James Bulicki, P.E. (via email)