



GILMORE & ASSOCIATES, INC.
ENGINEERING & CONSULTING SERVICES

December 7, 2023

File No. 2022-08001

David Boelker, Zoning Officer
Borough of Phoenixville
351 Bridge Street, 2nd FL
Phoenixville, PA 19460

Reference: Paradise Village Preliminary/Final LD Plan - Third Plan Review
190 Paradise Street
Tax Map Parcel Number: 15-8-22 and 15-8-24

Dear Mr. Boelker:

As requested, Gilmore & Associates, Inc. has reviewed the information listed below with regards to the Preliminary/Final land development plan and lot consolidation for Paradise Village dated February 15, 2023, and last revised on November 21, 2023, prepared by Bercek & Associates, and Fiscal Analysis of Paradise Development dated November 9, 2023, prepared by Emmanuel C. DeMutis. The site consisting of TMP 15-8-22 and 15-8-24 is approximately 255,570 SF (5.8671 acre) and is in the Mixed-Use Growth (MG), Mixed-Use Infill (MI) and Town Center (TC) Districts. The land development plan proposes to construct a new five (5)-story mid-rise building with 12,670 SF of commercial space on the first floor and two hundred (200) multi-family apartments on the second to the fifth floors by combining adjacent parcels and constructing the Hall Street extension, associated parking, and site improvements.

We offer the following comments for your consideration. A prior review had been issued on October 4, 2023, for Preliminary/Final Plans and the first review of the Preliminary/Final Plans was issued on April 6, 2023. This is the third review of the Preliminary/Final Plans. Any previous comments which have been addressed have been removed and **any new comments are in bold**.

1. Existing Conditions and Surrounding Land Use
 - a. The site is currently vacant.
 - b. The site is surrounded by Institutional development to the north and west, with an area of Industrial use to the northwest across Paradise Street. There is Commercial/Mixed Use development to the east and south of the site, and Recreational development to the southwest of the site.
2. Consistency with Phoenixville Regional Comprehensive Plan (PRCP 2021) and Chester County Comprehensive Plan
 - a. The proposed land use is generally consistent with PRCP 2021, as it “concentrates growth within established development zones” and cooperating regionally, “counteracts the various pathologies of sprawl”.

- b. As per the Future Land Use Map of the *Phoenixville Regional Comprehensive Plan* dated 2021, the site is categorized as Mixed Use and is part of the “Bridge Street West Economic Development Area”. The proposed land use of the development is generally consistent with the Phoenixville Regional Comprehensive Plan.
 - c. The proposed land use is generally consistent with the *Landscapes 3 Chester County Comprehensive Plan* adopted November 29th, 2018, as it concentrates growth in the most appropriate areas and calls for reinvestment in urban centers with a diversified mix of land use.
3. Open Space
- a. As per SALDO §22-500.3. A (1), in residential developments proposed to contain 20 or more dwelling units, the applicant shall set aside one acre per 20 units or fraction thereof for open space and recreational purposes. **The applicant has indicated that they will request to pay a fee in lieu of the provision of 9.71 acres of the required open space. Plans should be revised to include notes and details demonstrating compliance with this requirement, or a waiver would be required.**
4. Natural Resources
- a. As per SALDO §22-500.2.A., environmentally sensitive features are required to be preserved, including 100% of stream buffers, 70% of steep slopes (15-25%), 80% of very steep slopes (over 25%) and 50% of woodlands. The existing conditions plan (sheet 3 of 29) shows steep slopes 15-25% and very steep slopes over 25% that are proposed to be disturbed. A waiver for this requirement has been requested.
 - b. As per SALDO §22-501.1.C(3)(a), trees over six inches in DBH within a tract proposed for subdivision or land development shall not be removed unless afflicted with disease. Arborist Study by Rockwell Associates dated April 28th, 2023, was prepared. Page 4 of the Arborist Study indicates compensation is recommended for 30 vigorous trees found in fair condition. A waiver for this requirement has been requested.
5. Landscape and Buffer Requirements
- a. As per SALDO §22-428.1(a), as part of the preliminary plan submission applicants shall submit a landscaping plan prepared by a certified planting professional (landscape architect, nurseryman, horticulturalist, or urban forester). Plans should be revised to demonstrate compliance with this requirement, or a waiver would be required.
 - b. As per SALDO §22-419, sidewalks and planting strips shall be installed along all existing and proposed public and private streets, common driveways, and common parking areas, including both sides of the future Hall Street extension. A waiver for this requirement has been requested.
6. Lighting Requirements
- a. As per SALDO §22-422, streetlighting shall be required for all land developments. A waiver for this requirement has been requested.
7. Topsoil Protection and Finished Grading
- a. **As per SALDO §22-505.5.G, retaining walls over four (4) feet high in a residential area may be required to have such safety features as the Planning Commission and/or Council deem necessary. Additionally, the Pennsylvania Uniform Construction Code requires separate permitting and associated fencing for all walls over 48” high. A railing may be**

required along the length of the retaining walls on site, including the southwest side of Hall Street to minimize fall risk.

8. Paradise Village Fiscal Analysis Review

- a. The submitted Fiscal Analysis references data and figures (residential income amounts, real estate tax amounts, construction fees, number of jobs created, current and post-stabilization figures, etc.) However, the report does not cite the sources for this data. Citations for all figures referenced shall be included so that the information provided in the report can be verified (author, title, publication, publication date.) Data publishers are indicated, but not the actual reports or data sources.
- b. The Fiscal Analysis shall be revised to show the calculations used so that the fiscal conclusions included can be verified. For example, the report provides figures for Earned Income Tax, but does not show how that figure was calculated or the tax rates used.
- c. The Fiscal Analysis indicates that governmental services impacts are limited to Police and Fire protection. The report does not discuss potential impacts to the school district, to park and recreation services, general Borough services, and to demand on public utilities. The report also does not discuss the magnitude of the “drain” on governmental services or what this will mean for the ability of local government to provide those services. The report shall be revised to discuss all potential governmental services impacts.
- d. The Fiscal Analysis only touches on general market demand for the type of housing units proposed. Additional data shall be provided (and cited) demonstrating the local demand for these multifamily housing units.
- e. The Fiscal Analysis indicates a “Local Economic Impact” of \$4,400,000 for Year 1 Stabilized and \$5,720,000 for Year 10 Stabilized. However, it is unclear how these figures were derived. In addition, the report does not provide an explanation as to what exactly “Year 1 Stabilized” and “Year 10 Stabilized” means.
- f. The Fiscal Analysis indicates an income range of \$65,000 to \$250,000 per apartment for new apartment complexes. This is a wide range and likely encompasses many different types of apartment units with a varying number of bedrooms and/or residents. The report shall be revised to provide a more precise income range based on the characteristics of the units proposed and the minimum income required based on projected rent.
- g. The Fiscal Analysis references “Forbes” as indicating that every 100 apartment units provides on average \$2.2 million in local sales, taxes, and other government revenues. This figure is likely based on national trends and may not provide an accurate picture of anticipated revenue generation for the Phoenixville area. Figures more relevant to the subject geographical area (municipality, school district, and county) shall be used to determine potential revenues expected to be generated.

9. General Observations

- a. The proposed building is less than ten (10) feet away from the existing PECO right-of-way and existing utility poles along the northern property line. Required setbacks may apply. We defer to the Borough Engineer and Building Code Official.

- b. Plant quantities in the plant list shown on Sheet 24 Landscaping Plan do not appear to match the quantities shown on the plan. Plans should be revised to provide consistent plant quantities across the plan and plant list.**
- c. In conjunction with any resubmission, the applicant must provide a response letter using the same numbering system and explaining how each comment has been satisfactorily addressed.

If you have any questions or require additional information, please do not hesitate to contact me by phone at 610 587-8811 or by email ablank@gilmore-assoc.com.

Sincerely,



Adrienne L. Blank, R.L.A., ASLA
Landscape Architect
Gilmore & Associates, Inc.

ALB/si

cc: Owen Hyne, P.E., C.E.A., Remington & Vernick Engineers (Owen.Hyne@rve.co)