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## MEMORANDUM

To: Constance DuHamel

From: Paul Grygiel, AICP  
Keenan Hughes, LEED AP

Date: March 22, 2010

Re: **Final Comments on Knolls of Dover FEIS**

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This memo provides PPG's final comments on the Final Environmental Impact Statement (FEIS) for the Knolls of Dover project.

1. *From a fiscal impact viewpoint, the unit mix has been improved.* As recommended in our comments on the DEIS, the unit mix in the project has been revised to increase its fiscal benefits to the Town and the affected service districts. This was accomplished primarily through reducing the number of single-family homes in the project. However, at the same time, the number of age-restricted units has been reduced by 37%. The FEIS fails to include any analysis of the fiscal impacts of this reduction on the school district.
2. *The overall phasing of the project remains unclear.* There are inconsistencies within the FEIS regarding the phasing of the project. The "Proposed Phase 1 Housing by Type" (shown in Table II.G-5) indicates a total of 455 total units in Phase 1. However, the "Updated Fiscal Impact Study" contained in the appendix lists 431 residential units in Phase 1. On II.G-17, the text indicates 445 units in Phase 1. Table II.G-5 shows 430 "age-targeted" units in Phase 1, but the actual total is 326 units. A review of the study's phasing by unit type (see Table III.G-1) reveals additional inconsistencies. For instance, the number of single-family homes is 331 in the body of the FEIS and 312 in the Updated Fiscal Impact Study. It is also difficult to follow the changes to the impact calculations as the information is sprinkled throughout the responses to comments and not summarized in a table.
3. *The FEIS does not provide a clear assessment of the costs associated with the project.* First, the "Updated Fiscal Impact Study" still fails to include any information regarding the costs associated with serving the residents and workers in the project. In short, a study that does not consider costs cannot be considered a fiscal impact study. Moreover, Table II.G-7 in the Economic Conditions chapter shows a municipal cost estimate of \$352.33 per dwelling unit without providing any explanation for the calculation. This is a low per



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household cost estimate. (By comparison, we had assumed \$400 per person in our calculations – which equates to over \$800 per dwelling unit.)

4. *The marginal cost analysis is helpful, but it should be utilized to update the per-capita costs and applied to each phase.* The FEIS has included a marginal cost analysis, based on a budget review provided by the Town Supervisor. While this analysis is informative, it would be valuable to assess the service impacts based on the phasing for the project. What remains missing is an assessment of potential fiscal shortfalls over the long build-out period of the project.

Feel free to contact us with any questions on the above information.

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