

WEST HANOVER TOWNSHIP WATER AND SEWER AUTHORITY



7901 Jonestown Road, Harrisburg PA 17112

Telephone 717.540.0124

<http://www.whtsa.com>

Responses to Questions Raised at the November 21, 2017 Regular Meeting

Question: Why were the residents not notified of the change in location of the November 21, 2017 meeting?

Response: The meeting was relocated to the Township Recreation Center to accommodate a larger number of residents more comfortably. Unfortunately, the decision to relocate the meeting was made too late to advertise the change. The December 19, 2017, January 16, 2018 and February 20, 2018 meetings will be held at the Rec Center.

Question: What would it take for the Authority to change its mind and install a gravity sewer vs. a low pressure system?

Response: After evaluating a number of gravity and low pressure alternatives, the Authority has selected a low pressure system for Houck Manor. The low pressure system alternative design is 90% complete. At this point, the Authority has no intention of constructing a gravity sewer system in Houck Manor.

Question: Why weren't the residents of Houck Manor and Holiday Park approached five to eight years ago as the cost would have been significantly less to extend the sewer system?

Response: The Township's Act 537 Facilities Plan Update included a recommendation for extending the public sewer system to Houck Manor and Holiday Park. The recommended option was a combination gravity/low pressure system where all of the residents along Walnut and Chestnut Avenues would have been on low pressure pumps. The Plan also included an implementation schedule which was adopted by the Township as part of the Plan Update. As required by Act 537, the Township held a public hearing in 2006 prior to the final adoption and submission of the plan to DEP to solicit public comment. The Plan and schedule were discussed during the public meeting. Once adopted, the Township tasked the Authority with implementing the Plan in accordance with the schedule in the Plan. In 2013, a 5-year extension to the approved schedule for extending public sewer to Houck Manor and Holiday Park was requested. DEP granted the extension. Except for what was in the Plan Update, there were no additional details available until the 2014 Alternatives analysis was completed and reviewed. A public meeting for the residents of Houck Manor and Holiday Park was held September 7, 2016 to discuss the Alternatives Evaluation and the proposed sewer extension projects.

Question: Who will be responsible when the grinder pump fails?

Response: The property owners will be responsible for maintaining their own grinder pumps, including maintenance and repair.

Question: Why was the low pressure system selected and is there a capacity problem?

Response: The low pressure alternative was selected for Houck Manor because it is the most cost-effective of the gravity and combination gravity/low pressure alternatives evaluated in 2014. The low pressure system is amenable to the topography, eliminates the need for permanent easements through private property, and minimizes rock removal due to the relatively shallow construction depth. Also, the Authority has sufficient capital reserves available to construct the low pressure system. The estimated

Responses to Questions Raised at the November 21, 2017 Authority Meeting

construction cost for an all-gravity system is three times the estimated cost for the low pressure system. More importantly, the Authority would have to secure additional debt to finance the more expensive all-gravity project. The added debt will impact rates for all of the users of the public system. It is the Authority's position that it is not fiscally responsible to assess the existing users for additional debt incurred to construct the least cost-effective alternative. To avoid the added debt and impact on user fees, the property owners in Houck Manor would be assessed the cost to construct the all-gravity system through a Special Purpose Tapping fee ranging from \$30,000 to \$50,000 per property. Therefore, the low pressure alternative is the least cost alternative.

A capacity analysis of the portions of the Authority's existing sewer system receiving pumped flow from both Houck Manor and Holiday Park was performed and no capacity issues were identified. There is sufficient capacity in the existing wastewater treatment plant to accommodate both subdivisions.

Question: Can the sewer usage rate be lowered in Houck Manor because of anticipated increased operating costs of the low pressure system?

Response: Our solicitor has advised us that the Municipal Authorities Act requires uniformity of rates for similar service. There are other areas of the Township that use low pressure systems and those users are paying the same rate as the rest of the system.

Question: What percentage of the Township is not served by public sewer?

Response: While we don't know the percentage, almost all of the population centers are part of the public sewer system.

Question: Why was Houck Manor selected as a needs area requiring public sewer?

Response: Houck Manor was selected as a needs area in the 2006 Act 537 Facilities Plan Update due to a history of on-lot system malfunctions and poor well water testing results. Also, most of the on-lot systems were constructed prior to 1972 when statewide regulations were enacted establishing minimum requirements for on-lot systems. Most if not all of the existing properties in Houck Manor will not meet current regulations for on-lot systems. DEP considers these properties to be potential malfunctions. It is normal practice to connect these areas to a public sewer system when it becomes available.

Question: Can anything be done to remove Houck Manor as a needs area thereby negating the need to extend public sewer to the subdivision?

Response: The Authority does not have authority to add or remove areas from those designated for public sewer by the Township. Obviously, the presence of public sewer affects development density restrictions. Only the Township can decide how wastewater is to be handled in the Township, whether as part of the public sewer system or by individual on-lot systems. Once established in an Official Plan as a needs area, an Act 537 Special Study would have to be prepared by the Township that provides sufficient evidence that the area is not a needs area. Among other things, the Special Study would have to show that there are no on-lot system malfunctions that cannot be repaired, that the area will support on-lot systems, that there are no water quality problems associated with malfunctioning on-lot systems. You have to realize that just because there is no ponding of wastewater on the surface of the lawn does not mean that the system is functioning properly. If there is insufficient renovating soil, or the percolation rate is too fast, inadequately treated wastewater can pass through into the aquifer contaminating potable water wells.

Responses to Questions Raised at the November 21, 2017 Authority Meeting

Question: A resident had to replace an existing on-lot system after purchasing a property because the existing system did not meet current regulations. The resident asked why the Authority didn't inform them about plans to extend the public sewer system to Houck Manor.

Response: On-lot system management is strictly a Township responsibility. A Sewage Enforcement Office is retained by the Township to address questions and do inspections of on-lot systems. The Township does not advise the Authority of property transactions or on-lot system issues. Therefore, the Authority was not aware that the resident was purchasing a property in Houck Manor, or that the existing on-lot system had to be replaced. The Township was aware of the pending sewer extension project and was in a position to advise the resident.

Question: What happened to the Plan and grant money when the Township first installed the public sewer system?

Response: In the mid-1990s, the Township adopted an Act 537 Plan Update that established the original public service area. The Township tasked the Authority with constructing the new public sewer system and treatment plant. There were no state or federal grants awarded to the Authority for construction of the original system. The Authority was able to secure a low-interest loan through PennVest. Except for the revenue collected through the initial tapping fees assessed to each property, the project was financed through the PennVest. There was a grant from DEP (DER at the time) for 50% of the cost to prepare the Act 537 Facilities Plan Update. However, none of that grant could be used for construction or design of the system. It was awarded as a reimbursement after all of the cost for preparing the Act 537 Plan was paid out.

Question: Why isn't the Authority taking out a bond for this project?

Response: If the question is related to securing bonds as a loan for financing the project, the Authority does not have to incur additional debt in order to implement the selected low pressure alternative.

Question: If the cost of the treatment plant were distributed among all of the rate payers, why would the residents of Houck Manor have to absorb all of the costs for this project?

Response: The treatment plant services all of the rate payers in the public sewer system since all of the wastewater generated in the public sewer service area flows to the treatment plant. Therefore, all rate payers participate in costs related to the treatment plant. However, only the residents of Houck Manor will benefit from the sewers extended to Houck Manor. The rate payers outside of Houck Manor would be paying for service they are not receiving.

Question: Was DEP ever notified or given plans for this project?

Response: DEP was provided with plans in connection with application for general permits for stream crossings.

Question: Can the Authority perform a new study to determine if Houck Manor is still a needs area?

Response: An Act 537 Special Study could be performed to determine whether Houck Manor is still a needs area. However, it is the Township's responsibility for managing the wastewater needs in the Township. Because the Township adopted an Official Plan that identified Houck Manor as a needs area, it is the Township's responsibility to prepare the Special Study to amend the 2006 Plan Update if it can be determined that Houck Manor is no longer a needs area.

Responses to Questions Raised at the November 21, 2017 Authority Meeting

Question: When was the decision made to do a low pressure system and was there an opportunity for public comment before the decision was finalized?

Response: The decision to select the low pressure system was made following review of the 2014 Alternatives Evaluation Report in November 2014. A public hearing was not required and was not held. However, it was discussed at a regular meeting that is open to the public. A public meeting was held in September 2016 to introduce the project to the residents. The components of the low pressure system were reviewed. It was noted that the Authority would be purchasing the pumps initially and providing the pumps to the residents for installation. It was also explained that the residents would be responsible for operation and maintenance of the pumps. This meeting was held prior to the preparation of specifications and design drawings. There was time to provide comment to the Authority prior to completion of the design. However, no residents provided comment to the Authority until after the second public meeting in August 2017. In the interim, articles related to the low pressure project did appear in the Township newsletter.