

REMARKS OF EDITH STEVENS

NOVEMBER 14, 2007

PUBLIC HEARING ON WATER QUALITY MANAGEMENT PERMIT NO. 4507404

Good evening. I am Edie Stevens and I am a member of the Brodhead Watershed Association.

I would like to speak tonight about alternatives to the Pocono sewer project as it is currently proposed, alternatives that are doable, less costly, sustainable and highly preferable to the current proposal. And especially relevant to the current water quality management permit application as we could eliminate the need for this application.

I will not address the invitation that Stroud Township and Stroudsburg have extended to Pocono Township – to join them in rebuilding and expanding the Stroudsburg sewage treatment plant. I understand this proposal is still being studied by Pocono Township and their clients. However, we do not consider this a sustainable alternative, as it will still remove water from the Pocono watershed and still promote sprawl, with its own environmental impacts, along the Rt 611 corridor.

The alternative I would like to explore with you is one we have proposed to you and to Sanofi. And Sanofi has taken a major step toward accomplishing some of this alternative, by their purchase of 233 acres of land to be used for land application of wastewater. Lets look at that land a little more closely. Of the 233 acres purchased a large part is suitable for land application, based on studies done for Sanofi. I have a map showing test pits on that acreage, with the suitable areas highlighted in green. I've shown, with a red outline, the areas that will be used for land application. As you can see, there is considerable land remaining that could be used for additional land application.

But what about winter time you say, we can't do land application then. I agree, that under PA land application regulations, you cannot land apply in the winter months. So – for example - Great Wolf is now discharging their treated wastewater to Scot Run.

However, you can make snow, and snow-making has not been adequately investigated here. Treated wastewater is used for snow-making at four ski areas in PA. Near-by ski areas have expressed an interest in receiving Sanofi's treated wastewater to augment their water supply, but BWA's effort to facilitate those conversations was rebuffed by Sanofi. Perhaps they were concerned that the cost of building the pipeline would be all theirs, but that should not be. There's a \$10 million federal grant, an "earmark" in a Health and Human Services appropriations bill, that is designated for, "an infrastructure grant to improve the supply of domestically produced vaccine." That's from Public Law 109-13. That's Pocono Township's to spend, but it must be spent to benefit Sanofi. A Big Pipe to take it far away is not the only way Pocono Township could help Sanofi meet their wastewater needs.

There are several things to keep in mind as we look for solutions to Sanofi's wastewater needs. First, at this point, Sanofi will only be sending 350,000 gallons per day down the pipe, or to put it another way, they only need to find a solution for 350,000 gallons per day for only the winter months.

Second, they will be sending treated wastewater down the pipe, or alternatively, they could provide clean water for snowmaking.

It's easy to take gross figures and dismiss these suggestions as Pocono Township's engineer did in his June 25 letter to DEP responding to BWA's comments on the draft permit. Camelback uses "approximately 170 million to 200 million gallons during the snow-making season.." he said, and goes on to calculate storage needed for the whole 2 million gallon per day design flow of the proposed pipe.

Remember, the true need for Sanofi is 350,000 gallons per day, for the winter months. That's about 2 million gallons a week, not a day, and Camelback uses 20-25 million gallons per day. All of Sanofi's winter discharge is 25-30% of Camelback's water use.

I could go on, spouting numbers till we all fall asleep, so let me stop with the numbers and get back to how to design a sustainable, decentralized system. Decentralized wastewater planning must take in consideration the needs, and abilities/competencies, of individual entities. It must look at where the needs truly are, and Sanofi's are real, and consider how to meet those needs. It must look at land and water resources and design solutions that do not abuse their holding capacity.

Another map I want to share with you is a very rough look at areas that are suitable for land application – the green. Yellow is less suitable and grey is unsuitable. I say very rough, because when the land is looked at more closely, there are more suitable areas. This overlay was developed for BWA as part of our DCNR funded River Conservation Plan and is available on our website.

As we look at this map, it appears there are suitable lands on most large parcels. And certainly the plans I looked at recently for the Swiftwater Center – the former Swiftwater Inn property at the intersection of Rt 314 and Rt 611 -- prove that point.. This 26 acre site is being developed with a 17,800 square foot strip mall on the site of the old inn, and a four story, 64,000 square foot office building on the upper part of the property. 12 acres of the property will be used for these buildings and parking. All the waste from those buildings will be handled with an on-site system. A hotel is proposed for future development and that would depend on off-site wastewater management – current plans show.

Decentralized wastewater management, does not stop development. It puts treated wastewater back into the ground, where it can recharge ground water, contribute to base flow of streams and protect private wells. It assures that there will be some open space between the asphalt parking lots, and it protects water quality and quantity in streams.

But what about “downtown” Tannersville you may ask, surely something needs to be done there. We agree. And we believe that a small sewage collection system, and treatment plant, a collection system that extends beyond the Rt 611 corridor, and allows for a “village center,” as called for in the Monroe 2020 Plan, is the solution. There are farms and woods nearby that are possible land application sites, and Camelback is just up the road.

Big Pipes to take wastewater far away are not the way to go. Treated sewage is not a “waste” but a water resource we must conserve, recycle and reuse. The decentralized concept of wastewater management has been around for 20 years or more. Isn’t it time for the Poconos to catch on? Our high quality streams are too small to take any more abuse.

Let’s work together to find the best solution for managing, and protecting, our water resources, not continue to fire missives at one another and argue through consultants and engineers. True commitment from community leaders is needed for this to happen.