

**BWA STATEMENT FOR POCONO TOWNSHIP PUBLIC HEARING ON  
POCONO TOWNSHIP REGIONAL ACT 537 SPECIAL STUDY  
ROUTE 611 CORRIDOR – APRIL 18, 2006**

Thank you for providing this hearing tonight, and allowing members of the public to share their concerns with you about a project that will affect the residents of Pocono Township, and their neighbors, in many ways. We understand that this hearing is in lieu of an extension of the public comment period, per Pocono Township letter of 2/17/06 to BWA, and comments provided tonight will be included with the Rt 611 Corridor Special Study when it is sent to DEP.

The Brodhead Watershed Association has serious concerns about the “preferred alternative” that is identified in this Special Study. Alternative 9 is billed as a “nondischarge alternative” (see discussion of Alternatives 7 and 8) but cannot be considered a nondischarge alternative as it specifically proposes a discharge into the Brodhead Creek. We believe this alternative will be extremely costly, will place an undue financial burden on all property owners in the service area and will promote sprawl along the Rt 611 corridor.

The BWA believes that there are better ways to meet the wastewater needs of Pocono Township residents, industries, primarily Sanofi-Pasteur, and the commercial development in the village of Tannersville. We do not believe that the alternatives studied for this report have dealt sufficiently with possible solutions that will promote sustainable growth and will provide for the “managed corridor development” that is called for in the HSPS Joint Municipal Plan. A sewer line that runs from Swiftwater to Bartonsville will promote growth and sprawl along the Rt 611 corridor that the Township is not prepared for.

**Needs-** We believe the needs identified in the Special Study have been grossly over estimated. Time and again in Table 3-4, one-acre lots, currently occupied with one dwelling unit are listed as having 8 dwelling units in 10 years. No allowance seems to have been made for lots containing wetlands, floodplains, steep slopes, or other building constraints. To point out a few, look at Baggerly, Frailey, Jenner, Jiunta, and Ladeas on page 1 alone.

Table 3-4 shows flows from existing development, in Pocono and Hamilton Township, and including Sanofi’s 350,000 gpd to total 663,000 gpd. It then projects a total flow in 10 years to be 1, 472, 519, and arrives at that figure – with no increase from Sanofi - by assuming every piece of vacant land is built on and every currently developed property is re-developed to its maximum extent possible.

Although provision of public wastewater treatment capacity and collection systems can induce development, expensive treatment plants and collection systems can go underutilized and become a financial burden on the community. We fear this project is going to place an unimaginable financial burden on its current residents.

We would like to point out that the Special Study calls for a pipe along Rt 611 capable of handling 3 million gallons per day taking water to a plant with a capacity of 1.3 million gallons per day. This gives us pause for two reasons: the potential for groundwater infiltration to the sewer line causing an overload at the plant, leading to sewage overflows; and what kind of growth is planned that calls for an eventual need for 3 million gallons per day to be piped out of the watershed?

Gravity sewer lines, as proposed for the RT 611 corridor, are notorious for carrying away groundwater and/or for leaking sewage into the groundwater. When the groundwater table is high, and the sewer line is in the groundwater, water will leak into the line. When groundwater is low, sewage will leak out. It happens everywhere there are sewers, and has been called the “dirty little secret of the industry.” Thus, not only does the dirty water that has been use by the home or industry get carried away by the sewer pipe, but also groundwater goes with it, groundwater that would otherwise be providing base flow to streams or the water in someone’s well.

We would also like to lay to rest the myth that piping the treated effluent out of the Pocono watershed to the Brodhead is acceptable because the water is coming into the Pocono watershed from the Brodhead. First: the pipe into the Pocono has a maximum capacity of 1.5 to 2 million gallons per day. The pipe out will handle 3 mgd. Second, many of the users of the sewer line will be using their own wells, thus, their “waste” water will be water that has come from the ground in the Pocono watershed -- water that should be returned to the ground in the Pocono watershed.

**Alternatives Analysis** – The Study’s long list of alternatives has the appearance of being comprehensive – however many of the alternatives, especially the land application alternatives, are quickly eliminated, primarily due to presumed high cost of development and land that is required.

All of the land application alternatives are negatively impacted by the assumption of very large wastewater treatment needs. Furthermore it appears that all alternatives assume that extensive and expensive collection and conveyance systems must be constructed, delivering those very large wastewater flows to major new treatment facilities – all at great expense. (Over \$11 million for the pipeline the length of Pocono township.)

The Study’s analysis of land application alternatives assumes that all the “waste”water will be brought to one location – Bartonsville – and then treated and applied to the land. However, in that location there is little land available, and what there is, is expensive, so of course land application is not feasible under this scenario. If the land application alternatives had been examined from a decentralized viewpoint, we believe that considerable opportunities could be found for land application and groundwater recharge.

The Study does not deal with “decentralized” “small flows” systems. In fact, it equates “small flows” systems with individual on-lot systems, and finds that individual on-lot systems would not be adequate to deal with the flows projected. (*Page 1-7, Item V.B. and C.*)

If decentralized treatment concepts, perhaps using simpler lagoon treatment, at less inflated flow projections, had been honestly evaluated, we believe that the needs of development nodes, including Sanofi could be met with more reasonable costs.

And if land application were part of the mix, additional benefits would accrue to the project, including providing open space and reduce induced growth impacts. Wastewater infrastructure could then be used to guide growth in a “growth boundary” manner.

We also note that the needs of another major industry in the Township, Camelback Ski Area and Camelbeach have not been considered in this report. Camelback/ Camelbeach needs additional sources of water; purified “waste”water is a potential source for meeting that need.

It is quite easy to get a regulator, landowner or business operator to say, “we don’t do that here.” However, if we really want to meet the needs of the Pocono region in an environmentally sound way, we must attempt to guide thinking in new ways.

**The No Action Alternative – This alternative has been summarily dismissed,** however, on page 4-13 we read, “ The results of the Pocono and Hamilton Townships Wastewater Needs Studies show few present malfunctioning systems.” Additionally, paragraph 3 under the No Action Alternative indicates the public survey information is based on 70 responses. Of these 70, 29 qualify as potential malfunctioning systems, but no malfunctions have been reported. Hamilton Township’s survey reports one serious malfunction, another system adversely impacted by groundwater and nitrate contamination of one residential well. **We question why we need to build a \$56,000,000.00 sewage treatment system for that? We can provide you with many cost effective methods of dealing with these small, localized problems and potential problems.**

Also, part of the justification for “action” is, “Should no action occur ... the opportunity for a major employer in Monroe County and Pennsylvania to expand its facilities with a large flu vaccine production plant is lost.”

This statement is overblown, at least. Sanofi is currently moving ahead with plans to expand their discharge to Swiftwater Creek and to increase use of land application. They are investigating other opportunities for land application, including drip irrigation, which may meet all their future needs. The vaccine building is under construction. We will not lose this major employer.

**We do have some proposals for how the needs of the area can be met in a more sustainable way:**

Sanofi-pasteur - We find it interesting that this whole project began with the need to help Sanofi find additional wastewater disposal capacity so we could keep those good jobs and avoid the next flu pandemic. And now, the project continues, with a momentum of its own, and Sanofi’s needs are only 25% of the project.

Sanofi is currently looking at the lands they own and other near-by lands for their potential for land application of purified wastewater. We strongly support this effort and urge Pocono Township to lend its support as well. If the Township can consider building a 6.6-mile pipeline to take treated effluent from the Pocono watershed to discharge to the Brodhead, surely it could consider building a pipeline to take treated effluent from Sanofi to land application sites that may not be immediately adjacent to their property. As we have stated before, land application is much preferable to stream discharge as it keeps the water in the watershed, allows the soil to act as an additional filter and recharges groundwater.

The “village” of Tannersville – The Monroe County Planning Commission comments on the Special Study include, as its first comment:

**The County Comprehensive Plan has identified the Tannersville area as a growth center. Sufficient parcels exist for development or redevelopment, which should be part of an overall plan to enhance the Tannersville area as a major village. If done properly the area could be a model for the rest of the County.**

We agree wholeheartedly. If the pressure to meet Sanofi’s needs can be relieved by your support of their efforts to find suitable areas for land application of their treated effluent, you could take the time to plan for a village center at Tannersville that would be a model. That

plan would include a plan for managing the “waste”water produced in the village center, including such current concepts as reuse of treated wastewater for landscape irrigation and flushing toilets.

If that idea seems too radical for you (in spite of the fact that its in use in many areas in the country, including New York City), we want to point out that technology exists that make non-degrading discharges possible. A small sewage treatment plant could be constructed to serve the village of Tannersville and a non-degrading discharge could be made to the Pocono Creek at the property recently purchased from Pocono Mountain School District. The costs for the collection system, and the treatment plant would be miniscule, compared to the cost for the miles of piping and large treatment plant that are part of preferred Alternative 9 of the Special Study.

THE BWA has, for the 16 years it has been in existence, promoted the concept of keeping the water in the watershed. In 2004 we partnered with the Monroe County Industrial Development Authority, Planning Commission and Conservation District to sponsor a daylong seminar on “Sustainable Infrastructure Development.” I believe at least two of the Township Supervisors attended that program.

The sponsors of the program had hopes that some of the techniques for sustainable infrastructure presented that day would educate and inspire those in attendance to look beyond the undesirable and outdated concept of extending sewer lines in way that will promote undesirable development.

You are in a unique position. You can determine that Pocono and Hamilton Townships specifically and Monroe County in general can grow responsibly and sustainable and not make the same mistakes so many other areas have made.

The time is now, to learn from the past and plan to the future. Talk with the folks at Pleasant Valley Schools, Spruce Lake Retreat, East Stroudsburg North Campus and the new office park in Coolbaugh Township to learn about the methods they are using to effectively deal with wastewater. These are economically sound methods of wastewater management that work with the natural systems that sustain us all.