

PA Senate Environmental Resources & Energy Committee Public Hearing on MS4 Requirements  
September 11, 2019

Testimony Submitted by Steve Miller  
Council President, Borough of Greencastle, PA

Chairman Senator Yaw, Executive Director Troutman, Distinguished Guests, Visitors and  
Citizen's of the Borough of Greencastle,

Greetings and my sincerest thanks for all of you to make the time to come to our community to  
hear directly from us our concerns regarding the implementation and impacts of MS4 Municipal  
Separate Storm Sewer System.

As Borough Council President of Greencastle, Franklin County, Pennsylvania, I am requesting  
your support to revisit imposed requirements by the MS4 and Chesapeake Bay Implementation  
Plan. Current cleanup requirements are formulaically calculated based upon estimates with  
heavy emphasis on reduction of sediment, nitrogen and phosphorus generated primarily by  
farmlands not a small 1.6 square mile urban borough, such as ours. Requirements should be  
based on what a municipality generates within its corporate boundaries, as determined by  
actual pollutant data of stormwater outflows that feed tributaries to the Bay. All cleanup  
project efforts by a municipality should be limited to what can be performed within the  
municipal corporate limits. In the end, if a municipality has done everything it can within its  
area of direct control, then requirements should be based upon sustaining clean-up pollutant  
reduction projects using continued stormwater outfall sampling as evidence of same.

On May 30<sup>th</sup> 2019, the Borough Council approved establishment of a Borough Storm Sewer  
Utility. The only reason we created a Storm Water Utility was because legally we cannot raise  
property taxes high enough (above 30 mils) to generate sufficient revenue to cover MS4 costs.  
Now the citizens and businesses of my community face the ugly reality of how to pay MS4  
service fees. Many have told me their intentions are to leave the boro. We are concerned  
about falling property values and abandoned properties. On the other hand, if we did not  
approve, the alternative was having major fines imposed by DEP for non-compliance which  
could lead to financial municipal insolvency.

With few exceptions, the majority of Greencastle's citizens understand the need to control  
pollutants and sustain our environment for generations to come. But nearly all do not  
understand why the Borough of Greencastle has to pay for MS4 stream restoration projects  
outside of our corporate limits, in order to generate enough pollutant pound credits to avoid  
being fined. Beyond that, for the next cycle of MS4, the Borough has to find new streams to  
restore to generate sufficient credits – the emphasis is not on actual water quality sampling  
sustainment which it should be.

I read that Maryland Governor Hogan recently sent a letter to Governor Wolf stating in essence  
that PA needs to do more regarding the Chesapeake Bay. Reports I have read show that the

Bay is improving not getting worse. What I am convinced of is that PA is not being as smart and fair as it can be regarding pollutant reduction. Municipalities should be responsible for what their citizen contribute, not to subsidize those outside of the municipality. I am not advocating that the state or counties provide funding to subsidize projects – all that does is just add a tax/fee increase for all PA citizens behind a smoke screen, with more costly bureaucracy to oversee how the money is divvied out – in essence it will become a big grant writing exercise with politically based evaluation criteria to award grants.

My beloved town is damned if we do or damned if we don't, major economic impacts on one-hand or steep fines on the other. I voted to approve because I have faith, in not only my boro but also faith in you, that my plea for assistance to provide requirements relief will be heard.

//signed//  
Steve Miller  
President of Council  
Borough of Greencastle