

Testimony of Brian Harbaugh, Owner Precision Manufacturing & Engineering Co., Inc

THANK YOU FOR TAKING THE TIME TO HEAR OUR CONCERNS. ON MAY 1ST 2019 WE WERE FIRST NOTIFIED OF THE STORMWATER MANAGEMENT ISSUE AND THE IMPACT IT WAS GOING TO HAVE ON OUR COMPANY. BOROUGH MANAGER EDEN RATLIFF CAME TO OUR BUSINESS TO INFORM US THAT OUR ANNUAL STORMWATER MANAGEMENT FEE, (AKA THE RAIN TAX AS WE CALL IT), FOR OUR PROPERTY IN THE BOROUGH OF GREENCASTLE WOULD BE JUST OVER \$18K PER YEAR. IN ADDITION TO THAT, HE ALSO INFORMED US THAT THE \$18K WOULD NEED TO BE COLLECTED IN FULL BY OCTOBER 31, 2019. THAT GAVE US 6 MONTHS TO COME UP WITH \$18K THAT WASN'T BUDGETED FOR OUR SMALL BUSINESS. I WILL NOTE THAT THIS FEE WAS LATER REDUCED TO \$14K PER YEAR DUE TO WHAT THEY SAY WAS A RECALCULATION. THIS IS NOW A SEPARATE UTILITY FEE ON OUR WATER AND SEWER BILL. WE STARTED ATTENDING THE BOROUGH MEETINGS TO GATHER MORE INFORMATION AND BASICALLY ENDED UP WITH MORE QUESTIONS THAN ANSWERS.

I KNOW WE ARE DEALING WITH AN UNFUNDED FEDERAL MANDATE THAT IS ULTIMATELY BEING DRIVEN BY THE WHOLE "SAVE THE BAY" CAMPAIGN. IN AND OF ITSELF I HAVE NO PROBLEM WITH SAVING THE BAY, BUT I DO HAVE SOME QUESTIONS:

WHAT DETERMINES THAT THE SMALL BOROUGH OF GREENCASTLE, PA SHOULD BE CLASSIFIED AS AN MS4 REGION?

ACCORDING TO BOROUGH OFFICIALS, THE BOROUGH IS REQUIRED TO REDUCE ITS SEDIMENT/POLLUTANTS BY OVER 93,000 LBS IN THE FIRST 5 YEAR PERMIT PERIOD.

WHERE DOES THAT FIGURE COME FROM? HOW DO THEY DETERMINE HOW MUCH THE BOROUGH IS CURRENTLY RESPONSIBLE FOR?

AS OF JULY 2019 THE BOROUGH HAD A POPULATION OF 4,052 AND ENCOMPASSED LESS THAN 2 SQ MILES.

THE BOROUGH IS MOSTLY COMPRISED OF RESIDENCES, SMALL BUSINESSES, & STREETS. THEREFORE ITS MAKEUP IS PREDOMINATELY ROOFTOPS, CONCRETE, BLACKTOP, GRAVEL & GRASS. IT IS MY UNDERSTANDING THAT NITRATES ARE ONE OF THE BIGGEST POLLUTANTS THAT ARE CREATING THESE ISSUES. I CAN'T IMAGINE WHERE THEY WOULD BE COMING FROM WITHIN THE BOROUGH. WE HAVE ONE SMALL (AND I EMPHASIZE THE WORD SMALL) STREAM THAT RUNS THROUGH THE BOROUGH. I DON'T SEE HOW THAT STREAM CAN BE RESPONSIBLE FOR A LARGE AMOUNT OF POLLUTANTS. AND EVEN IF IT IS, I HIGHLY DOUBT THE POLLUTANTS ARE ORIGINATING WITHIN THE BOROUGH. I HAVE AN OPINION OF WHERE QUITE A BIT OF SEDIMENT AND "POLLUTANTS" MAY BE COMING FROM. PLEASE UNDERSTAND, I HAVE THE UTMOST RESPECT FOR OUR AREA FARMERS, BUT IF YOU DRIVE AROUND THIS COUNTY DURING A RAINSTORM YOU CAN EASILY SEE WHERE THE MAJORITY OF THE RUNOFF IS COMING FROM. THAT BEING SAID, IT SHOULD BE NOTED THAT THERE ARE NO FARMS, THAT I KNOW OF, OPERATING WITHIN THE BOROUGH. SO AGAIN, I STRUGGLE WITH THE AMOUNT OF REDUCTION THAT IS REQUIRED FROM THE BOROUGH.

AS I SEE IT THE MAJOR PROBLEM IS, THERE AREN'T ANY "SPECIFIC" INSTRUCTIONS TO THE BOROUGH AND TOWNSHIPS FROM THE PA DEP OR THE EPA ON WHAT TO FIX AND HOW TO FIX IT. THEY JUST PASS THIS MANDATE DOWN THE LINE AND LEAVE IT TO THE MUNICIPALITIES. THEY PASS ALONG VAGUE GUIDELINES AND IDEAS AND THEN ISSUE CREDITS WHEN SOME OF THESE ARE DONE.

THE BOROUGH HAS WILL ISSUE CREDITS OF APPROX \$20-\$50 OFF YOUR ANNUAL BILL IF YOU DO ANY OF THE FOLLOWING:

ATTEND EDUCATIONAL MEETINGS ON STORMWATER ISSUES....USE RAIN BARRELS TO COLLECT WATER (BARRELS MUST BE APPROVED) AND THE ONE I PARTICULARLY ENJOY, PLANTING TREES...

BUT NOT JUST ANY TREES. NO, THE TREES MUST BE APPROVED BY THE GREENCASTLE SHADE TREE COMMITTEE. THEN THE ACTUAL SITE OF THE PLANTING MUST ALSO BE APPROVED.

THIS ENTIRE THING SOUNDS MORE LIKE "POLITICS" THAN ANYTHING ELSE.

I BELIEVE THAT MOST TOWNSHIPS AND BOROUGH DO NOT HAVE THE ABILITY TO DECIPHER WHAT IS REALLY BEING ASKED OF THEM LET ALONE THE BEST WAY TO IMPLEMENT WHAT THEY DON'T REALLY UNDERSTAND. FURTHERMORE, WITH THE BOROUGH OF GREENCASTLE BEING UNABLE TO PAY FOR ANY OF THE REQUIREMENTS, (THAT AGAIN, APPEARS TO BE MORE OF A GUESS ON MY PART) 100% OF THE COST IS BEING PASSED ON TO THE PROPERTY OWNERS. THEY ARE ESTIMATING THIS AT A PRICE OF OVER \$630K PER YEAR FOR AT LEAST THE NEXT 10 YEARS.

ALONG THE LINES OF THIS MANDATE PASSING A FINANCIAL BURDEN TO THE PROPERTY OWNERS, IT SHOULD BE NOTED THAT THE GREENCASTLE ANTRIM SCHOOL DISTRICT LIES WITHIN THE BOROUGH. THE PROJECTED ANNUAL FEE FOR THE SCHOOL DISTRICT IS OVER \$47K PER YEAR. AS WE ALL KNOW, THE SCHOOL DISTRICT HAS NO WAY OF GENERATING REVENUE TO PAY THIS FEE. THEREFORE ALL OF IT IS BEING PASSED ALONG TO THE PROPERTY OWNERS WITHIN THE SCHOOL DISTRICT IN THE FORM OF INCREASED TAXES.

UNLIKE IN GOVERNMENT, WHERE THESE AND OTHER EXPENSES ARE PASSED ALONG TO THE RESIDENTS AND BUSINESS OWNERS IN WHATEVER COMMUNITY IT AFFECTS VIA FEES & TAXES, PRIVATE CITIZENS AND PRIVATE INDUSTRY CAN'T PASS IT ALONG. WE HAVE TO DEAL WITH IT HEAD ON.

SO WITH THAT IN MIND, IF YOU WOULD KINDLY INDULGE ME FOR A MINUTE, I WOULD LIKE ALL OF THE EMPLOYEES OF PRECISION MFG TO STAND UP.

SEE, IN PRIVATE INDUSTRY, WHEN WE ARE HIT WITH THIS \$14,000.00 ANNUAL "RAIN TAX" FROM THE BOROUGH, INCREASED SCHOOL TAXES, AND COMING IN 2020, AN ADDITIONAL \$2,000.00 PLUS WHEN THE TOWNSHIP FEE KICKS IN THAT MONEY HAS TO COME FROM SOMEWHERE. UNFORTUNATELY, THESE ARE THE PEOPLE IT DIRECTLY AFFECTS. NO MATTER HOW YOU SLICE IT, THIS \$14K FEE FROM THE BOROUGH, ALONG WITH THE INCREASED TAXES AND THE FEE COMING NEXT YEAR FROM THE TOWNSHIP HITS OUR BOTTOM LINE AS WELL AS EVERY OTHER HOUSEHOLD OR BUSINESS.

THAT MEANS THERE IS LESS MONEY TO INCREASE WAGES, MATCH 401K CONTRIBUTIONS, PAY EMPLOYEE HEALTH BENEFITS, PAY YEAR END BONUSES, PURCHASE TOOLING, SHOP SUPPLIES, AND SO ON.

WE CAN'T JUST CONTACT OUR CUSTOMERS AND SAY, "WE HAVE THIS NEW FEE AND HIGHER TAXES SO THE PRICE OF ALL OF THE PARTS WE MAKE FOR YOU WILL BE INCREASED BY 3-5% TO COVER IT."

WITH OUR CUSTOMERS FORCED TO COMPETE GLOBALLY, THE SMALL BUSINESSES IN THIS AREA ARE FORCED TO COMPETE AS WELL. YOU START RAISING PRICES AND CUSTOMERS START SHOPPING ELSEWHERE NO MATTER WHAT TYPE OF BUSINESS YOU ARE OPERATING.

IN ADDITION TO THE IMMEDIATE IMPACT THESE FEES ARE CREATING, I ALSO HAVE TO LOOK AT THE FUTURE. IF OR WHEN I WOULD GET TO THE POINT THAT I WOULD LIKE TO SELL THE PROPERTY IN THE BOROUGH, I AM SURE IT WON'T HELP IN THE PROCESS WHEN I TELL THE BUYER...OH, BY THE WAY, THIS PROPERTY COMES WITH A \$14,000.00 ANNUAL BILL BECAUSE IT RAINS IN THE BOROUGH.

IN CLOSING, I WOULD LIKE TO AGAIN THANK YOU FOR ALLOWING ME TO EXPRESS MY CONCERNS ABOUT THIS ISSUE. I HOPE THAT AS A RESULT THERE CAN BE SOME RELIEF GRANTED TO THE BUSINESSES OF THE BOROUGH AND TOWNSHIP TO EASE THE FINANCIAL BURDEN THIS IS CREATING.