



# Borough of Greencastle

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TO: Senate Environmental Resources and Energy Committee

FROM: Eden R. Ratliff- Borough Manager Greencastle, Pa

SBJ: September 11, 2019 Public Hearing to discuss Municipal Separate Storm Sewer System (MS4) Requirements

Stormwater Management and the Pennsylvania Department of Environmental Protection Municipal Separate Storm Sewer System (MS4) program has catastrophic impacts on municipalities throughout the Commonwealth of Pennsylvania. Municipal managers view stormwater through several lenses which include, stormwater management, stormwater volume, and stormwater quality. The MS4 program focuses on stormwater quality through the requirement of a Pollutant Reduction Plan (PRP) as outlined in the Pa General Permit 13.<sup>1</sup> Over the course of 5 years, the PRP mandates a 10% sediment reduction from the Borough's stormwater outfalls as outlined in DEP's Municipal Requirements Table.<sup>2</sup> The requirement of a PRP in conjunction with a 10% sediment reduction over the course of 5 years, places an unsustainable financial burden on small municipalities creating devastating economic impacts.

The Borough of Greencastle is a small bedroom community with a population of 4,000 and total geographic area of 1.6 square miles. The impact of the MS4 program, and specifically the PRP, are greater than the majority of our currently provided government services. The estimated cost to the Borough of Greencastle in order to meet the sediment reduction requirement over 5 years is \$2 million. The estimated costs over 10 years is \$5.6 million.

In order to meet the MS4 sediment reduction requirements the Borough of Greencastle created a self-sustaining stormwater utility. The idea for a utility was discovered upon the realization that MS4 costs could not be supported by our general fund tax revenue. The utility assesses a stormwater pollutant impact fee (SPIF), which provides needed revenue to support MS4 program costs. The utility assesses fees in the amount of \$630,000.00 per annum in order to meet the stated financial obligation of the program. The SPIF is assessed in accordance with total impervious area. The highest annual bill in the Borough is the school district which is ultimately paid by the taxpayers. A residential home owner pays between \$100.00 and \$2,000.00 per annum.<sup>3</sup>

Total Annual Stormwater Fees	\$630,000.00
Total School District Stormwater Fee	\$47,204.41
Small Business Stormwater Fee	\$1,300.00- \$30,000.00

<sup>1</sup> Pennsylvania Department of Environmental Protection General Permit 13 Appendix D

<sup>2</sup> Pennsylvania Department of Environmental Protection MS4 Municipal Requirements Table

<sup>3</sup> Borough of Greencastle SPIF Stratification June 2019

The majority of Greencastle residents and business owners are receiving a stormwater pollutant impact fee that is greater than their water and sewer bill combined. As a result, one impact shows that those on a fixed income will be priced out of their homes and businesses with a small profit margin may close or relocate. Additionally, \$630,000.00 a year split among the 1,900 businesses, homes, churches, and non-profits all receiving a stormwater bill is over half a million dollars are taken out of the local economy that small towns depend upon.

**Requested Action:**

The Borough of Greencastle sincerely requests that the Commonwealth of Pennsylvania put a hold on the execution of all MS4 Pollutant Reduction Plans until a cost effective program can be put into place. This will allow for stormwater fees to be put into hold status while MS4 administrators work with DEP and the legislature to develop a comprehensive sediment reduction program that has a greater financial return on investment. In the meantime, MS4 communities such as Greencastle will continue to meet MS4 minimum control measures focusing on public education, detecting and eliminating illicit discharge, and community engagement with stormwater quality.

Thank you to Senator Yaw and Senator Yudichak and the Environmental Resources and Energy Committee for the opportunity to testify about the financial burden the sediment reduction requirements of the Municipal Separate Storm Sewer program is having on small communities in our Commonwealth. We look forward to swift commonsense action by our legislature and welcome the opportunity to assist with further investigation and action by the legislature and Department of Environmental Protection.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Eden R. Ratliff". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Eden R. Ratliff  
Borough Manager  
Greencastle, Pa