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## Appendix M: Public Review Period



## **PUBLIC NOTICE**

### **EASTERN PIKE COUNTY REGIONAL ACT 537 PLAN UPDATE SEWER LINE EXTENSION, ON-LOT DISPOSAL SYSTEM (OLDS) MANAGEMENT ORDINANCE AND SHALLOW GROUNDWATER STUDY MILFORD BOROUGH, WESTFALL TOWNSHIP, AND MATAMORAS BOROUGH TO MUNICIPAL AUTHORITY OF THE TOWNSHIP OF WESTFALL WASTEWATER TREATMENT PLANT MILFORD BOROUGH, WESTFALL TOWNSHIP, AND MATAMORAS BOROUGH, PIKE COUNTY, PENNSYLVANIA**

Notice is hereby given that Milford Borough, Westfall Township, and Matamoras Borough of Pike County, Pennsylvania propose sewer extensions to the Municipal Authority of the Township of Westfall (MATW) Wastewater Treatment Plant (WWTP) pursuant to the Act 537 Plan Update (Plan). The Planning Areas include the entirety of Milford Borough and Matamoras Borough, as well as portions of Westfall Township. Milford Township formally withdrew from the Plan in July 2024 and is not a participant of the Plan. The Planning Areas for Westfall Township include Westfall Township Northeast and Westfall Township Southwest. Westfall Township Northeast borders Matamoras Borough to the north, and the Delaware River to the east. Specifically, Westfall Township Northeast borders the Price Chopper Supermarket located within the south of Matamoras Borough and Mountain Avenue in the west of Matamoras Borough. Westfall Township Southwest borders the Delaware River to the east and Route 6/209 generally to the west. The far western boundary of Westfall Township Southwest includes the lots directly west of Route 6/209. Specifically, Westfall Township Southwest borders the McDonald's Restaurant located on Route 6/209 to the north, and the Milford Township / Westfall Township line to the south. The map of the Planning Areas can be further found in Appendix C of the Plan.

The Plan Update evaluates and addresses the wastewater disposal needs of the Planning Areas identified above. Several Structural Sewerage Alternatives were considered and evaluated as part of the Plan development for each Planning Area. Alternative Nos. 1B, 3B, and 4B (identified/summarized below and further elaborated upon in the Plan) are the recommended and selected structural alternatives in the Act 537 Plan Update for each of the three (3) participating municipalities, respectively. The Plan also indicates that Milford Borough, Westfall Township, and Matamoras Borough shall each develop and adopt their own Ordinance governing the management of On Lot Disposal Systems (OLDS). The Plan additionally indicates that Milford Borough shall perform a shallow Groundwater Study (supporting OLDS management) to further evaluate subsurface conditions in the residential areas of the Borough that are not included as part of the final proposed sewer service area per this Plan. The subject Groundwater Study results shall be subsequently submitted by Milford Borough to the Pennsylvania Department of Environmental Protection (DEP) in the form of an Act 537 Plan Special Study.

With regard to the Structural Sewerage Alternatives introduced above, the Plan recommends a low-pressure sewer in Matamoras Borough along Pennsylvania Avenue as well as some of the municipal roads identified as needs areas based on the applicable OLDS survey results (Alternative No. 1B). These Matamoras Borough roads include Tenth Street, Seventh Street, Avenue Q, and Avenue N. Matamoras Municipal Authority is the entity that will own, operate, and maintain the proposed extension for Matamoras Borough.

The Plan also recommends a low-pressure sewer line in Westfall Township that extends the current conveyance line ending at the McDonald's Restaurant located on Route 6/209 to the Milford Township / Westfall Township line (Alternative No. 3B). MATW shall be the entity that will own, operate, and maintain the extension in Westfall Township.

The Plan additionally recommends a low-pressure sewer extension to primarily serve the commercial zoning district for properties along Broad and Harford Street in Milford Borough with a low-pressure sewer main that extends to the Milford Township / Westfall Township line on Route 6/209 (Alternative No. 4B). In Milford Borough, the proposed sewer line shall run along East and West Harford Street as well as the two alleys behind either side of Broad Street (Blackberry Alley and Gooseberry Alley) before converging onto Broad Street and eventually Route 6/209. The proposed force main that is located along the right-of-way on Route 6/209 in Milford Township is a transmission line with no connections presently proposed or accounted for in Milford Township as part of this Plan. A formal planning submission to DEP would be separately required by Milford Township for any future sewage connection(s) to the transmission line

running through Milford Township. For Milford Borough, the Milford Water Authority is the entity that will own, operate, and maintain the sewer facilities proposed within this extension. Milford Township shall not bear any costs or responsibility regarding this proposed structural alternative.

A 30-day public comment period is hereby established for Plan review and comment. Notice was previously provided to the Milford Borough Planning Commission, Milford Township Planning Commission, Westfall Township Planning Commission, Matamoras Borough Planning Commission, and the Pike County Planning Commission, with minimal comments received in response from the Planning Commission(s) upon review of the Plan. The Planning Commission comments have been addressed and incorporated into the Plan.

The MATW WWTP is permitted to discharge treated effluent to the Delaware River, and at the outfall location, the river is classified as a Warm Weather Fishery (WWF).

MATW's current residential and commercial sewer rental user fee within Westfall Township is \$60 per month for each connected Equivalent Dwelling Unit (EDU). Each participating municipality and respective Authority anticipate applying separately for funding with proposed sewer system infrastructure to be owned, operated, and maintained as indicated above. For Matamoras Borough, utilizing the Plan's targeted 45% grant with USDA financing, Matamoras Borough would have an estimated monthly user rate of \$108/EDU upon implementation of Alternative No. 1B. For Westfall Township, utilizing the Plan's targeted 45% grant with USDA financing, Westfall Township would have an estimated monthly user rate of \$64/EDU upon implementation of Alternative No. 3B (which is similar to the existing monthly user rate in Westfall Township). For Milford Borough, utilizing the Plan's targeted 45% grant and USDA financing, Milford Borough would have an estimated monthly user rate of \$99/EDU upon implementation of Alternative No. 4B. The user rates were determined based on estimated costs that are detailed in Chapter 5 of the Plan.

Individuals interested in reviewing a copy of the Act 537 Plan Update Revision may do so by visiting the Pike County Public Library located at 119 East Harford Street, Milford, Pennsylvania, 18337 during normal business hours, or by visiting the Milford Borough (<https://milfordboro.org>), Westfall Township (<https://westfalltownship.org>), or Matamoras Borough (<https://matamorasborough.com>) websites. A full online copy of the Plan is also uploaded to the following link: [https://www.hrg-inc.com/hrg\\_projects/eastern-pike-county-regional-act-537-plan/](https://www.hrg-inc.com/hrg_projects/eastern-pike-county-regional-act-537-plan/)

The public may submit written comments on the Act 537 Plan Update Revision to Ms. Jazzmine Holmes, Administrative Assistant of Herbert, Rowland & Grubic, Inc. (HRG) via email at [jholmes@hrg-inc.com](mailto:jholmes@hrg-inc.com) or via written letter to HRG Attn: Jazzmine Holmes; 501 Allendale Road, Suite 203, King of Prussia, Pennsylvania 19406 during the 30-day public review and comment period, which will commence on December 20, 2024, and terminate on January 19, 2025.

**Borough of Milford**

**Joseph Dooley, Council President**

**Township of Westfall**

**Robert Llewellyn, Chairman of Board of Supervisors**

**Borough of Matamoras**

**Eric Kudrich, Council President**

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## **AFFIDAVIT OF PUBLICATION**

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Milford Borough Council  
500 BROAD STREET  
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STATE OF PENNSYLVANIA, COUNTY OF MONROE

The Pocono Record, a newspaper printed and published in the city of Stroudsburg, and of general circulation in the County of Monroe, State of Pennsylvania, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated on:

12/20/2024

and that the fees charged are legal.  
Sworn to and subscribed before on 12/20/2024

Legal Clerk

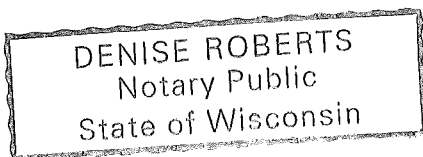
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Public Notice  
 Eastern Pike County Regional Act 537 Plan Update  
 Sewer Line Extension, ON-LOT DISPOSAL SYSTEM (OLDS) Management Ordinance and Shallow Groundwater Study  
 Milford Borough, Westfall Township, and Matamoras Borough  
 To Municipal Authority of the Township of Westfall Wastewater Treatment Plant  
 Milford Borough, Westfall Township, and Matamoras Borough, Pike County, Pennsylvania  
 Notice is hereby given that Milford Borough, Westfall Township, and Matamoras Borough of Pike County, Pennsylvania propose sewer extensions to the Municipal Authority of the Township of Westfall (MATW) Wastewater Treatment Plant (WWTP) pursuant to the Act 537 Plan Update (Plan). The Planning Areas include the entirety of Milford Borough and Matamoras Borough, as well as portions of Westfall Township. Milford Township formally withdrew from the Plan in July 2024 and is not a participant of the Plan. The Planning Areas for Westfall Township include Westfall Township Northeast and Westfall Township Southwest. Westfall Township Northeast borders Matamoras Borough to the north, and the Delaware River to the east. Specifically, Westfall Township Northeast borders The Price Chopper Supermarket located within the south of Matamoras Borough and Mountain Avenue in the west of Matamoras Borough. Westfall Township Southwest borders the Delaware River to the east and Route 6209 generally to the west. The far western boundary of Westfall Township Southwest includes the lots directly west of Route 6209. Specifically, Westfall Township Southwest borders the McDonald's Restaurant located on Route 6209 to the north, and the Milford Township / Westfall Township line to the south. The map of the Planning Areas can be further found in Appendix C of the Plan.  
 The Plan Update evaluates and addresses the wastewater disposal needs of the Planning Areas identified above. Several Structural Sewerage Alternatives were considered and evaluated as part of the Plan development for each Planning Area. Alternative Nos. 1B, 3B, and 4B (identified/summarized below and further elaborated upon in the Plan) are the recommended and selected structural alternatives in the Act 537 Plan Update for each of the three (3) participating municipalities, respectively. The Plan also indicates that Milford Borough, Westfall Township, and Matamoras Borough shall each develop and adopt their own Ordinance governing the management of On Lot Disposal Systems (OLDS). The Plan additionally indicates that Milford Borough shall perform a shallow Groundwater Study (supporting OLDS management) to further evaluate subsurface conditions in the residential areas of the Borough that are not included as part of the final proposed sewer service area per this Plan. The subject Groundwater Study results shall be subsequently submitted by Milford Borough to the Pennsylvania Department of Environmental Protection (DEP) in the form of an Act 537 Plan Special Study.  
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ship / Westfall Township line on Route 6209 (Alternative No. 4B). In Milford Borough, the proposed sewer line shall run along East and West Harford Street as well as the two alleys behind either side of Broad Street (Blackberry Alley and Gooseberry Alley) before converging onto Broad Street and eventually Route 6209. The proposed force main that is located along the right-of-way on Route 6209 in Milford Township is a transmission line with no connections presently proposed or accounted for in Milford Township as part of this Plan. A formal planning submission to DEP would be separately required by Milford Township for any future sewage connection(s) to the transmission line running through Milford Township. For Milford Borough, the Milford Water Authority is the entity that will own, operate, and maintain the sewer facilities proposed within this extension. Milford Township shall not bear any costs or responsibility regarding this proposed structural alternative.  
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 Borough of Milford  
 Joseph Dooley, Council President  
 Township of Westfall  
 Robert Llewellyn, Chairman of Board of Supervisors  
 Borough of Matamoras  
 Eric Kudrich, Council President  
 December 20 2024  
 LSOM0210574

1. Has HRG ever gotten approval for a submitted ACT-537 from the PADEP?
  - 1.1. If yes what Borough or Township and when?
  - 1.2. How many more revisions are anticipated until approval. In the original letter of intent, it was assumed that 1 revision would be required. This was clearly not the case.
2. In the Executive Summary it states that "...the planning area for this Act 537 Plan is Milford and Matamoras Boroughs in their entirety,"
  - 2.1. This does NOT match the Milford Borough scope as outlined in P2 paragraph 2 - Public sewer service shall be provided for Milford Borough along Broad and Harford Street (Alternative No. 4B).
  - 2.2. Which one is correct?
3. Also, on page ES2 paragraph 2 it states that for Milford Borough the cost is estimated to be \$99 per EDU.
  - 3.1. Please provide an example of how an EDU is calculated.
  - 3.2. What is the average EDU monthly usage per residence and commercial property in the proposed Milford Borough area?
  - 3.3. The billing for sewage will be through the MWA (Milford Water Authority). Does there current billing software to create a separate cost for water usage and sewage disposal?
    - 3.3.1. If not, what would a new software package or upgrade cost.
4. Page ES-3 states the following:
5. "Milford Borough, Westfall Township, and Matamoras Borough shall implement an OLDS management ordinance. The Ordinance would provide requirements for the permitting, inspection, operation, maintenance, and rehabilitation of OLDS within the Study Areas and throughout the municipalities. Recommended periodic pumping of OLDS would be included within the Ordinance. Successful implementation of such an Ordinance would be expected to have a positive impact on surface water and drinking water supplies in areas of the three Municipalities where OLDS systems are utilized. Periodic pumping of the tanks will provide for improved operation of the systems and will help to eliminate the occurrence of OLDS malfunctions. Currently, none of the municipalities have any ordinances or regulations requiring mandatory OLDS pumping. The implementation of an OLDS Management Ordinance would allow the Municipalities to further evaluate the need for improved sewage facilities after tank pumping activities have commenced for some period of time."
  - 5.1. Am I correct in assuming that means only the 2 alleys paralleling Broad St. and E/W Harford St. properties are included for the Borough?
  - 5.2. How does this align with the latest PADEP mandate to provide documentation as to why all of Milford Borough should not have sewers?

- 5.2.1. It was also mandated that testing for Nitrate contamination of shallow ground was to be done to check for contamination.
- 5.3. Will HRG be involved in any of these procedures or document developments, or the testing listed above?
- 5.3.1. What is the time frame for submission to the PADEP for the 5.2 and 5.2.1?
- 5.4. If yes, what is the estimated cost?
6. Comment - It was stated by the President of the previous Milford Borough Council that this project would not be approved unless 75% of the cost was covered by Grant Money. This was not used as a metric. ES-2 clearly states 45%!
7. From Page 3-8 Table 3-4 Summary of Malfunction Categories:
- 7.1. The # of Confirmed Failures (5) needs to be updated. One of the fails was in Milford Township. This is the same data as from the original ACT-537.
8. The system proposed in this ACT-537 is a low-pressure system with residents and businesses being required to install "Grinder Pumps".
- 8.1. It is stated in this ACT-537 that this method of sewage disposal is the "cheapest" method from others that were considered. If the Engineering firm hired to do the actual development work determines that this system will not work what would be the EDU cost for other systems?
- 8.2. Who pays for the initial cost and installation of Grinder Pumps? It was stated by the previous Council that the initial cost for this would be covered by Grant Money. Is that still the case?
- 8.3. What is the cost range for "Grinder Pumps" and what is the life expectancy.
- 8.4. Businesses will of course all need backup generators if connected, correct?
9. Page 2-11 Table 2-2
- 9.1. This table outlines the Topographical features/Soil Characteristics which can support OLDS Systems.
- 9.2. I did not come across how this overlays to the individual Municipalities.
- 9.3. Would you agree that Milford Boroughs Topography (200ft above the Delaware) and soil composition make it Ideal for filtering of OLDS systems?
10. Are the Financing Options still valid since this Data is now at least 3 years old?

**Summary of Financing Options for Selected Alternatives (Applying Separately)**

Analysis of Financing Options for Selected Alternatives (Applying Separately)											284
Milford - Selected Alternative 4B			Project Cost: \$ 7,500,000		Annual O&M Cost: \$ 102,200		No. of EDUs				
Option	Description	Tapping Fee Towards Pjt	Grant	Loan	Interest Rate	Term (Yrs)	Annual DS Cost	Resulting Annual User Rate/EDU*	Resulting Monthly User Rate/EDU*	Total Interest over Term of Loan	
4B- 1a	PENNVEST - w/ no grant	\$ -	\$ -	\$ 7,500,000	1.743%	20	\$447,379	\$ 2,277	\$ 190	\$1,447,572	
4B- 1b	PENNVEST - w/ Targeted 45% Grant	\$ -	\$ 3,375,000	\$ 4,125,000	1.743%	20	\$246,058	\$ 1,443	\$ 120	\$796,164	
4B- 2	USDA - w/ Targeted 45% Grant	\$ -	\$ 3,375,000	\$ 4,125,000	3.250%	40	\$185,740	\$ 1,193	\$ 99	\$3,304,610	
4B- 3	Bank Loan	\$ -	\$ -	\$ 7,500,000	6.000%	20	\$653,884	\$ 3,132	\$ 261	\$5,577,684	
4B- 4	Bond Issue	\$ -	\$ -	\$ 7,500,000	5.000%	30	\$487,886	\$ 2,444	\$ 204	\$7,136,573	

# **Westfall Township, Milford Borough, and Matamoras Borough**

## **Response to Public Comments (Fred Weber December 31, 2024)**

January 31, 2025

We have reviewed the public comments from Mr. Fred Weber from December 31, 2024, regarding the Eastern Pike County Regional Act 537 Plan project. Our responses are indicated below.

- 1 HRG has received approval for submitted Act 537 Plans numerous times from DEP.
  - 1.1 A few recent examples include Larksville Borough in 2022 and Halifax Township in 2019.
  - 1.2 This is anticipated to be the final revision of the Plan.
- 2 The projected sewer service area and the Planning/Study Area are two different entities. The entirety of Milford Borough was evaluated for sewage needs as identified in the Plan. This is the defined Planning/Study Area. The public sewer service area in Milford Borough is the area that was determined based on needs analysis of the entire Borough (the Planning Area). Both statements are correct and do not contradict each other.
- 3 The cost is estimated to be \$99 per EDU in Milford Borough.
  - 3.1 An Equivalent Dwelling Unit (EDU) is defined as 200 gallons per day as indicated in the Plan. For each alternative considered, an Engineer's Probable Project Cost Opinion was prepared based on the estimated cost of construction to implement an alternative. These are all included in Chapter 5 of the Plan. Table 5-10 is located in Chapter 5 of the Plan and provides a breakdown of the monthly costs. The EDU costs are determined by adding the Estimated Annual Debt Service Costs and O&M Costs together. The annual total estimated cost is divided by the number of EDUs projected to connect in each alternative, and the EDU annual is divided by 12 to convert it into a monthly EDU Cost. As noted in the table, there is a \$25 monthly wholesale rate per EDU. Of the selected alternatives, Table 5-11 provides a breakdown utilizing targeted grant amounts and various financing options.
  - 3.2 All single-family homes shall be one EDU. Commercial properties' EDU counts shall be determined based on usage. For commercial properties, the number of EDUs will be the volume of monthly flow in gallons per day divided by 200 gallons per day. Commercial properties are highly variable, and the projected EDUs along the proposed sewer service area are listed in Appendix E of the Plan.
  - 3.3 Currently the water authority outsources its billing for water. It would utilize the same or another company to bill wastewater usage. The bills would be separate. The sewer service areas are shown in Alternative No. 4B with the properties explicitly listed in Appendix E of the Plan. The properties along East and West Harford Street as well as the two alleys behind Broad Street and a small portion of Broad Street are part of the proposed Sewer Service Area.
- 4 No comment was provided, rather just a statement of text from the Plan.
- 5
  - 5.1 The Study Area includes all of Milford Borough, and the OLDS Ordinance is for the entirety of the Borough not designated in the Plan for proposed public sewer service. The Alleys paralleling Broad Street and East and West Harford Streets are part of the proposed sewer service area, a subarea of the Study Area.
  - 5.2 There is no PADEP Mandate specifically for Milford Borough. As part of the Act 537 Process, the Study Areas were evaluated to determine the sewage disposal needs. A needs analysis of the Study/Planning Area (entirety of Milford Borough) was performed in Chapter 3 of the Plan. Due to a variety of factors including but not limited to the soils, OLDs data, Milford Borough Zoning and Lot size requirements, and parcel size analysis, Alternative No. 4B is the proposed sewer service area. The analysis did not identify a need to expand the service area into the entirety of



Milford Borough. In addition, shallow groundwater testing shall be performed and submitted to PADEP in the form of a 537 Plan Special Study.

5.2.1 Correct. DEP suggested that testing for Nitrate Contamination of the shallow groundwater be performed, and Milford Borough has chosen to complete this.

5.3 The Shallow Groundwater Monitoring/ Study and Act 537 Plan Special Study will be bid out by Milford Borough, and Milford Borough shall review and select the firm or firms based on costs and qualifications. In addition, HRG does not have a Hydrogeologist on staff, and there has been no discussion to date of HRG performing this analysis.

5.4 This time frame is included in the Implementation Schedule which is in the Executive Summary of the Plan. By Year 2 following DEP approval, Milford Borough will perform the shallow groundwater study, and by Year 3, the Special Study shall be submitted to DEP. No estimated cost can be provided at this time. A hydrogeologist would first need to be hired to define the necessary scope. This will be done following submission of this Plan.

6 The Borough is committed to implementing this Plan and is targeting at least a 45% grant amount. There is no Borough mandate that the project has to be 75% grant funded to be implemented. Milford Borough shall work to maximize the grant amount and financing options. The 45% targeted grant amount was used to project costs along with USDA/ PennVEST Financing.

7

7.1 The values on the referenced table are correct. The data is the same data from the original Act 537 Plan Submission.

8.1 Due to the topography, potential for shallow rock, and projected financial costs, the low-pressure sewer alternative was selected. In addition, the MATW Sewer System is pressurized, so in the event gravity was selected, a pump station would be required to tie into the existing sewer system. Because it was not the selected alternative, specific sites for the proposed pump station were not further evaluated. Alternative No. 4A is the alternative method for sewage disposal which features a centralized pump station, gravity and a small amount of low-pressure sewer. Projected costs associated with this alternative are included in Chapter 5 of the Plan. In addition, there is not a technical reason why the low-pressure sewer alternative would not work.

8.2 The initial cost for the grinder pumps and their installation is included in the estimated Engineer Cost Opinions in Chapter 5 of the Plan. There are no guarantees for securing grant money, but the initial grinder pumps would be financed as part of the construction costs and incorporated into the loan repayment / monthly sewer bill and not be a direct upfront charge to the residents.

8.3 In Chapter 5, the price for the furnishing and installation of a Simplex Grinder Pump is \$9,000, and the price for the furnishing and installation of a Duplex Grinder Pump is \$15,000. The published average time between service calls is 10 years per vendor literature. Grinder pumps have been known to last well over 20 years for cases of normal use.

8.4 Businesses that want or need to stay open or require food protection during power outages should already have generators. For businesses that do not stay open during power outages, they do not require generators. However, in order to continue having sewage service during a power outage, a generator would be required.

9.1 Acknowledged.

9.2 Map 5 in Appendix C of the Plan contains the map in question.

9.3 From a soil mapping perspective, the soil composition is generally suitable in Milford Borough for conventional inground systems. However, there are other considerations aside from soil such as lot size for drainage fields, prevalence of pre-regulatory systems such as Cesspools, and frequency of septic pumping. In addition, if a system was failing, it is possible the malfunction is

below the surface which is why Milford Borough shall perform a shallow groundwater study within two years of this Plan's approval.

- 10 The financing options have been updated during each iteration of the Plan and were last analyzed and calculated in September 2024. The estimated construction costs are based on recent bid data of similar projects, and the financing rates were verified in 2024. As a result, all projected construction costs and financing options are up to date at the time of this Plan.

## Roberts, Matthew

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**From:** Holmes, Jazzmine  
**Sent:** Monday, January 20, 2025 7:33 AM  
**To:** Roberts, Matthew  
**Subject:** FW: Pike County Act 537 Plan

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**From:** john.messer analogyllc.com <john.messer@analogyllc.com>  
**Sent:** Sunday, January 19, 2025 3:40 PM  
**To:** Holmes, Jazzmine <jholmes@hrg-inc.com>  
**Subject:** Pike County Act 537 Plan

This message originated from outside your organization

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To whom it may concern:

- 1 As a resident, business owner and member of the planning commission of Milford Borough, I would like to make the following comments regarding the proposed sewer system for Milford Borough:
- 2
  - Milford borough has an infrastructure issue that could severely impact the quality of life for those impacted by the plan. Our existing electrical supply system is woefully inadequate and is susceptible to outages due to lack of redundant power options. Failures of as long as three days have been observed in the last three years. Under the proposed plan, a failure of that length would negatively impact residents.
- 3
  - Much of the data that was used for the development of the plan is already obsolete. Businesses have closed, buildings have expanded and much of the data no longer valid.
- 4
  - Do the prices quoted in the document reflect current cost or projected costs at the time of contract award? With a 7 year implementation window, pricing will certainly be different.
- 5
  - Along the same lines as above, the monthly cost per EDU is quoted at \$99. Please comment on the projected cost per EDU at time of implementation.
- 6
  - I think the plan does a disservice to the community by not addressing the entire borough rather than only the business district. This is a plan for 7 years from now and many of the residents will need to update their existing OLD systems. Providing the option for all residents to connect to the system would help in long term planning for the borough.
- 7
  - Please provide a life cycle analysis of the net present value of the proposed system vs the many OLDS currently in service.

Respectfully submitted,

John Messer  
Owner



JOHN H. WALLACE HOUSE  
• BED & BREAKFAST •

(610) 662-5393

[john@jhwallacehouse.com](mailto:john@jhwallacehouse.com)  
[www.jhwallacehouse.com](http://www.jhwallacehouse.com)

120 E Harford Street  
Milford PA, 18337

# **Westfall Township, Milford Borough, and Matamoras Borough**

## **Response to Public Comments (John Messer January 19, 2025)**

January 31, 2025

We have reviewed the public comments from Mr. John Messer from January 19, 2025, regarding the Eastern Pike County Regional Act 537 Plan project. Our responses are indicated below.

1. Acknowledged. It is noted that Mr. John Messer was a member of the Milford Borough Planning Commission during the Planning Commission Review of the Act 537 Plan conducted in October 2024 (10/14/2024 Meeting). The Planning Commission unanimously voted (in October 2024) to approve the 537 Plan as written without any comments in the Plan Review Letter. In addition, at the 11/12/2024 Milford Borough Planning Commission Meeting, the subject October 2024 meeting minutes were unanimously approved with Mr. John Messer being second to motion. As a result, these comments are from a resident/business owner and not representative of the Milford Borough Planning Commission.
2. The proposed sewer service area is almost entirely zoned commercially. Businesses that are required or desire to stay open during grid power outages should already have adequate backup generators in place. Properties within the proposed sewer service area can purchase simple generators with 240V, 30-60A capabilities if they wish to ensure continuous sewer service during any potential grid outage. It is further understood that Milford Borough's primary electric provider is assessing the feasibility of possibly providing an alternate diversified second transmission feed which may mitigate future issues.
3. The water usage data and EDU calculations within the Plan are based on 2019 data. Milford Borough was built-out in terms of parcels in 2019, so as a result, water usage within the Borough continues to be very similar to historical trends. While some businesses have closed, they have tended to have been replaced by similar types of businesses with similar wastewater needs. For example, during this time, one Bed & Breakfast was opened, and another Bed & Breakfast closed down which had similar room capacity. The overall water usage (particularly within the commercial district, based upon water bills) does not indicate significant variations from 2019 to 2024, etc. Based also on current evaluations of lot sizes and zoning requirements, expansions or change of use to food service would be unlikely.
4. The costs within the Plan are based upon 2024 dollars. The project will be bid in 4 years (as opposed to 7 years). Year 7 is when construction is anticipated to be complete with sewer service connections made. There is a 20% construction contingency already built into the cost estimates provided in the Plan, to account for inflation, certain unknowns, etc.
5. The monthly cost of \$99 per EDU is based on 2024 dollars. It is the best projection that can be made at the time of this Plan and was determined to reasonably reflect expected cost at time of implementation.
6. As part of the Act 537 process, all Study Areas were evaluated to determine unique sewage disposal needs. A needs analysis of the Study/Planning Area (entirety of Milford Borough) was performed in Chapter 3 of the Plan. Due to a variety of factors including but not limited to the soils, OLDS data, Milford Borough zoning and lot size requirements, and parcel size analysis, Alternative No. 4B represents the resulting proposed sewer service area. The analysis did not identify a need to expand the service area into the entirety of Milford Borough (with all factors considered) yet provides near-future measures to sufficiently address the ongoing and/or long-term needs of OLDS customers. To this point, shallow groundwater testing shall be performed and submitted to PADEP in the form of a subsequent 537 Plan Special Study, in part to better understand/characterize the subsurface and assess the viability of remaining OLDS. An OLDS Ordinance will also be adopted to ensure proper OLDS management. Further, a public survey was conducted as part of Milford Borough's latest comprehensive plan. A majority of residents were in favor of central sewage to the commercial district, yet opposed to extending central sewage to the residential areas of the Borough. Finally, having optional connections is not a viable option as suggested in the comment. In order to obtain favorable financing such as PennVEST, mandatory connection ordinances are required.
7. A related present worth financial analysis is included in the tables supporting Chapter 5 of the Plan. It is otherwise outside of the scope of the Plan to perform a lifecycle analysis comparing the proposed sewer system to the existing swath of OLDS presently in service; and this further incorrectly assumes

equivalency that a new sewer system is equal in viability to perpetuating the use of OLDS (many of which may pre-date the 1970s). In order to remotely ascertain such a computation, each individual OLDS in consideration would have to attempt to be evaluated for cost on a case-by-case basis and involve acquisition/review of detailed past records on pumping frequency, age of system, etc. Further, given the fact that a majority of undersized OLDS properties are within the commercial district, such an evaluation would also need to factor in the potential real estate cost to purchase additional/adjacent property. As such, a lifecycle analysis for OLDS is not being performed, and instead; aforementioned measures including the 537 Plan Special Study (shallow groundwater testing) and the adoption of an OLDS Ordinance, will counteract the need for such an evaluation. The life cycle cost of the proposed sewer system is included in the projected monthly user cost, which further includes Operation and Maintenance (O&M costs), etc.