



The General Assembly
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

April 17, 2013

Christopher Abruzzo
Acting Secretary
PA Department of Environmental Protection
16th Floor, Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101-2301

Dear Secretary Abruzzo:

In regard to the proposed technical guidance, Sewage Facilities Planning Module Review for On-lot Sewage Systems Proposed in High Quality and Exceptional Value Watersheds (DEP ID: 385-2208-001), please understand that we share significant concerns with this guidance as written.

As you know, in many rural areas across the Commonwealth, traditional municipal wastewater treatment facilities simply cannot be located near many homes and growing areas nor in a cost-effective manner. Accordingly, residents and communities have relied upon on-lot systems for sewage treatment. And, they have proudly done so in a manner consistent with established regulations which have protected our valuable water resources. In fact, the ability of our streams to be designated as High Quality and Exceptional Value demonstrates that efforts to protect water quality have been successful.

Moreover, this guidance seems to be based not on science, but rather, on stream designation. For example, on-lot systems depend upon factors such as system size and type and soil conditions for proper and effective sewage treatment. Yet the concepts and best management practices outlined in the guidance rely upon watershed classification as their basis rather than the actual functionality of a proposed on-lot system.

Finally, as our economy continues to struggle, rural communities simply cannot afford additional costs placed upon home buyers, homeowners, and businesses that further impede economic growth. The technical guidance contained in this document will certainly increase the costs of new on-lot systems, but also render these systems as cost-prohibitive in many locations or simply prohibited in others. Any such outcome would devalue property, weaken tax bases, and strip landowners of the rights to their property.

