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Mark Boeckel, Principal Planner
Centre Region Planning Authority
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Re: Beneficial Reuse Special Study

Dear Mr. Boeckel:

I write to enter a public comment regarding the Beneficial Reuse Special Study on extension of the system to the Tussey Mountain Ski Area and the Mountainview Country Club.

I do not want the COG General Forum to approve the extension project at this time, primarily because of the opportunity cost. If UAJA has \$2.4 million in public ratepayer funds to spend on public water and sewage planning and management, I would prefer that those funds go to the following, higher community priorities, rather than continue a piecemeal approach to watershed management and sourcewater protection.

To the extent that COG approval of the Tussey and Mountainview extension will “buy time,” I regard it as a can-kicking evasion of public officials’ current fiduciary obligations as trustees of Pennsylvania’s public resources.

I would like to see our public officials engage in difficult, comprehensive examinations of resources and waste discharge capacities and develop wise, long-term strategies to protect sourcewater and waterways downstream of our population, through the following three projects:

1) Drafting and approval of an update to the 2003 Sourcewater Protection Agreement, signed between UAJA, SCBWA and CTWA.

The updated agreement should include Penn State University, and should require regular water quality testing for primary and secondary contaminants of water at wellheads, the UAJA Spring Creek outfall, the Penn State experimental program at the State Gamelands, and the UAJA beneficial reuse processing plant, no less than annually.

Penn State should be held, as the other entities are held, to all state and federal regulations and the Chesapeake Bay program, and not given preferential treatment or exemptions from water quality programs enforced on other public and private entities.

If UAJA needs to use public funds to litigate the matter and challenge Penn State’s exemptions in the State Legislature, I would support such spending.

2) Drafting and approval of a comprehensive watershed management plan for the Centre Region.

The watershed management plan should place equal burdens for participation, disclosure and compliance on SCBWA, CTWA, Penn State’s water system, UAJA and Penn State’s sewage treatment systems, along with all regional MS4 stormwater collection and discharge systems, plus Penn State’s stormwater management system.

The management plan should, at minimum, include an analysis of the relationship between Penn State’s historic and projected enrollment growth, regional population growth, and impacts on regional sourcewater, stormwater and sewage treatment carrying capacities from an ecological standpoint, taking into account our unique karst geology.

The management plan should use current, standard, widely affordable technologies (not experimental or high-tech systems) and compliance with current state, federal and Chesapeake Bay water quality standards.

The management plan should examine multiple population scenarios over the next 50 years, at a minimum, the following three scenarios:

- a) steady-state, assuming adoption of zoning codes that cap population density at the current respective density levels of each COG municipality and the Penn State campus;
- b) full build-out at current zoning in COG region municipalities and;
- c) full build-out with maximum upzoning increasing density to maximum levels in State College and the five surrounding Townships (as has been done, for example, with the Metropolitan, Rise, Residences at College and Atherton in the urban core, and at the Toll Brothers/PSU site in Ferguson Township in the suburban periphery.)

If UAJA needs to use public funds to litigate a watershed management plan to ensure Penn State's full participation and compliance with laws and regulations to which the other public entities are held, I would support such spending.

3) Review of current business models of SCBWA, CTWA and UAJA, pressures on those business models (commodity pricing v. service pricing) given the impacts of conservation reducing consumption, and alternative business models that can ensure sustainable financial operations without population/customer base growth.

The business model analysis should include a comprehensive analysis of volumetric billing for UAJA sewer treatment and compliance with Act 57 of 2003.

CONCLUSION:

Upon completion of those three higher-priority tasks, I would prefer to see the COG engage in a comprehensive Act 537 Plan update, which could include beneficial reuse extensions to Mountainview Country Club, Tussey Mountain Ski Area *and other areas*, and if so, should include public cost-benefit analysis of each extension option to support an eventual public selection of the best “bang for the buck” option.

Thank you for the opportunity to provide public comment.

Sincerely,

/s/ Katherine Watt

cc: Cory Miller, Director, UAJA, crmiller@uaja.com
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