



LEHIGH VALLEY PLANNING COMMISSION

961 MARCON BOULEVARD, SUITE 310, ALLENTOWN, PENNSYLVANIA 18103-8397
(610) 264-4544; FAX (610) 264-2616; e-mail: lvpc@earfy.com

EARL B. LYNN
Chair

IRA J. FARO
Vice Chair

ELEANORE M. HAYDEN
Treasurer

MICHAEL N. KAISER
Executive Director

September 1, 2000

Mr. John Sheeran, P.E.
Schoor DePalma
P. O. Box 304
Kulpsville, Pennsylvania 19443-0304

*Re: Draft Official Sewage Facilities Plan for
Upper Milford Township, Lehigh County*

Dear Mr. Sheeran:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on August 31, 2000, reviewed the above-referenced plan. Our review was based on the adopted plans and policies of the LVPC and provisions of the Pennsylvania Sewage Facilities Act (Act 537). We offer the following comments.

The Upper Milford Township plan update studies the sewage needs of three areas of the Township. These areas are the Vera Cruz, Old Zionsville Village and Powder Valley Village areas. The draft plan identifies the Vera Cruz area as a priority sewage needs area due to the incidence of on-lot system malfunctions and contaminated wells. Previous studies have indicated contamination of Leibert Creek which appears to be caused by malfunctioning systems. Small lot sizes preclude the possibility of installing new on-lot systems for many of the lots. The plan recommends this area to be connected to the Lehigh County Authority collection system with treatment at the Allentown treatment plant as the most cost-effective alternative. Annual user fees are approximately \$1,300 based on PennVest funding, a \$2,500 tap-in fee and no grant. Fees would be less if a grant could be secured. The draft plan indicates that the needs of Old Zionsville and Powder Valley Villages are less critical based on the needs study. Further, connection to a public system would be cost prohibitive for these two areas at this time. Needs for these areas would be revisited within five to ten years.

A municipal Official Sewage Facilities Plan is required to address the existing and future sewage needs of a municipality. This is accomplished by setting guidelines for resolving existing sewage disposal problems, maintaining existing sewage facilities and planning for the needs of future development. The Township's plan studies only three specific areas of the Township. We recommend the Township amend the plan to include the sewage needs of the entire Township. The

04/30/2002 TEL 610 264 2616 LEHIGH VALLEY PLANNING 003
Mr. John Sheeran, P.E.
Schoor DePalma
September 1, 2000

LVPC *Water Supply and Sewage Facilities Plan*, December 1995 identifies several areas of the Township as potential on-lot sewage disposal problem areas including the Vera Cruz and Old Zionsville areas. Two additional potential problem areas identified in our 1995 Plan are the Zionsville area adjacent to Lower Milford Township and the Knollwood Subdivision. The Township Plan should verify whether problems exist in these areas.

A portion of the Vera Cruz study area is recommended for public sewer service in our 1995 Plan. Providing public sewer service to this area would be consistent with our Plan. Providing public sewer service to on-lot problem areas not recommended for service would be consistent provided that a detailed solution analysis is completed identifying this alternative as the most cost-effective long-term option. If connection to the public system is identified as the best solution, the system should be designed to serve only the area of need and not to encourage urban development. We are concerned about the high user fees associated with the chosen alternative. Further, we don't believe all available alternatives have been evaluated. Past sewer projects in other rural municipalities including East Allen and Lehigh Townships had met with great resistance due to high user fees. The East Allen project was never constructed for this reason. The LVPC completed a study of needs for the Vera Cruz area in 1983. The study compares the costs of a community on-lot system and connection to the public system. The study found that the cost of a community on-lot system was approximately 40% less than connection to the public system. The Township plan does not provide an evaluation of a community on-lot system to serve the area. We recommend that the Township not move forward with the selected alternative until all options are evaluated.

As previously discussed, Old Zionsville and Powder Valley Villages are not proposed for public sewers. Old Zionsville was shown to have a number of suspected malfunctions and both areas were shown to have high percentages of potential malfunctions. No additional alternatives to public sewers were evaluated for these areas. The Township plan should consider other options such as a sewage management program. A sewage management program would provide for the proper operation and maintenance of both existing and new systems through regular pumping and inspection in these areas.

Please contact Susan L. Rockwell if you have any questions regarding these comments.

Sincerely,



Geoffrey A. Reese, P.E.
Chief Engineer

GAR:kms

cc: Linden Miller, Manager, Upper Milford Township
Upper Milford Township Supervisors
Harley Davis, PA Department of Environmental Protection



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STEVEN L. GLICKMAN
Vice Chair

NILS HOVIK
Treasurer

MICHAEL N. KAISER
Executive Director

November 21, 2003

Mr. Karl Schreiter, Jr.
Schreiter Engineering Associates, Inc.
7 Raleigh Drive
Downingtown, PA 19335-1103

**Re: Act 537 Review – Draft Official Sewage Facilities Plan
for Upper Milford Township, Lehigh County**

Dear Mr. Schreiter:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on November 20, 2003, reviewed the above-referenced plan. Our review was based on the adopted plans and policies of the LVPC and provisions of the Pennsylvania Sewage Facilities Act (Act 537). We offer the following comments.

The draft plan proposes the extension of public sewers to three areas of the Township: Vera Cruz, South 7th Street and Golf Circle areas. Based on an on-lot sewage disposal needs study of the Township, the Vera Cruz and South 7th Street were determined to be in high need for alternative sewage disposal options. The Golf Circle area has been included because of previous requests from homeowners to provide sewers to the area. The plan evaluates several alternatives to correct the identified problems in the Vera Cruz area including connecting to public sewers through LCA or Emmaus and construction of a new wastewater treatment plant with either stream discharge or land application. Connection to public sewers through LCA is the recommended option for the Vera Cruz area. The South 7th Street and Golf Circle areas would connect to public sewers through Emmaus. The plan also proposes the establishment of a sewage management district that includes all the on-lot system areas of the Township.

A portion of the Vera Cruz area is recommended for public sewer service in our *Water Supply and Sewage Facilities Plan*, December 1995. Providing public sewer service to this area would be consistent with the Plan. Providing sewer service to on-lot problem areas not recommended for service would be consistent provided that a detailed solution analysis is completed identifying this alternative as the most cost-effective, long-term option and that the system capacity is designed to serve only the areas of need. We believe the alternatives to sewers should be more thoroughly evaluated in the plan,

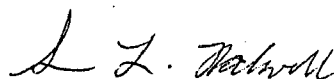
Mr. Karl Schreiter, Jr.
Schreiter Engineering Associates, Inc.
November 21, 2003
Page Two

especially given the high connection fees associated with the chosen alternative. Further, the provision of sewers could lead to unintended additional development in the area. On-lot problems have existed in the area for over 20 years. The high cost of connecting to public sewers continues to be a problem in implementing this alternative. The draft plan identifies a new wastewater treatment plant with land application as an alternative but determines it is infeasible since there is the presence of limestone bedrock in the area. DEP regulations do not prohibit an absorption area or spray field in areas underlain by limestone. The plan also does not consider the possibility of a community on-lot system. The LVPC completed a study of needs for the Vera Cruz area in 1983. The study compares the costs of a community on-lot system and connection to the public sewer system. The study found that the cost of a community on-lot system was approximately 40% less than connection to the public system.

The Golf Circle area is located in an area recommended for sewer service in our 1995 Plan and the provision of sewers is consistent with the Plan. We previously reviewed the proposal for public sewers for the South 7th Street study area as a new project in the LCA Preliminary Capital Plan 2004-2008. This project is in an area recommended for on-lot sewage disposal in our Plan. According to our Plan, areas experiencing malfunctioning on-lot systems should undergo a complete alternatives analysis including on-lot alternatives. This project would be consistent with LVPC policies if the Township's Act 537 plan identifies public sewers for the area as the most cost-effective long-term option. The plan does not evaluate other alternatives and should be amended to evaluate other possible solutions. Establishment of a sewage management program is consistent with our Plan for all on-lot problem areas. A sewage management program would provide for the proper operation and maintenance of both existing and new systems through regular pumping and inspection in these areas.

Please call me if you have any questions.

Sincerely,



Susan L. Rockwell
Senior Environmental Planner

cc: Daniel DeLong, Township Manager
Kate Crowley, Water Management Program Manager,
PA Department of Environmental Protection



SCHREITER ENGINEERING ASSOCIATES, Inc.
7 Raleigh Drive
Downingtown, PA 19335-1103

December 18, 2003

Daniel A. DeLong, Township Manager
Upper Milford Township
PO Box 210
Old Zionsville, PA 18068-0210

Subject: Upper Milford Township
Act 537 Plan Revision
Response to LVPC Comments
SEA Project 050-001

Dear Dan:

As requested, we have reviewed the comments prepared by the Lehigh Valley Planning Commission as outlined in their letter dated November 21, 2003. Based on our review of the comments and subsequent discussions with Ms. Susan Rockwell of the LVPC, we understand that the Planning Commission has the following major issues with the Act 537 Plan:

- Require further analysis of Land Application Alternative (Alternative #6 of draft Plan)
- Require development of an alternative using community systems to service Vera Cruz Area
- Require development of an alternative using community systems to service South 7th St. Extension Area

1.0 Require Further Analysis of Land Application Alternative (Alternative #6 of draft Plan)

As outlined in the draft report, the land application alternative was not further evaluated due to geological conditions in the area. This conclusion was reached based on past work completed by our firm regarding installation of a spray irrigation system at the Mount Trexler Nursing Home in Upper Saucon Township. This proposed spray irrigation system was to be located in an area that was relatively close to the Vera Cruz area.



Mr. DanDeLong
December 18, 2003

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The construction of this spray irrigation system was opposed by Upper Saucon Township due to potential environmental impacts. Although the area directly under the proposed spray irrigation site was not in the area mapped with carbonate rock, data obtained from private landowners in the area indicated that carbonate rock and associated caverns were present within the bedrock area. This issue was appealed to the Pennsylvania Environmental Hearing Board (EHB).

This issue was resolved by requiring Upper Saucon Township to revise the Act 537 Plan and extend the North Branch Interceptor to provide sewer service to the Mount Trexler Nursing home. As a result of this decision of the EHB, use of spray irrigation in the Vera Cruz area of Lower Milford Township was not feasible due to similar geological conditions as found in the area of the Mount Trexler Nursing Home.

In addition, the Act 537 Plan has shown that use of a treatment plant with stream discharge is not cost effective. Therefore, the costs associated with a land application system would be greater. Additional capital costs would include:

- Pumping station to transfer treated wastewater to spray field
- Construction of treated effluent lagoon
- Acquisition of spray field and construction of effluent spray distribution system

Also, these systems would dramatically increase the operating costs of any land application treatment alternative.

Based on these cost factors and considerations associated with potential impact of geological conditions, no further analysis on a land application alternative was completed.

2.0 Require Development of an Alternative Using Community Systems to Service Vera Cruz Area

Use of a community system in this area of the Township was not feasible due to the size and capacity requirements associated with providing sewer service to the Liebert's Creek drainage basin. As shown on Table 2-21, the projected wastewater flows from the immediate Vera Cruz area alone are 0.041 mgd. As outlined in Appendix L, a community system to provide sewer service with this capacity requirement would include use of a packaged type treatment plant.

In addition, the Act 537 Plan has shown that use of a treatment plant with stream discharge is not cost effective. Therefore, the costs associated with a land application system would be greater. Additional capital costs would include:



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- Pumping station to transfer treated wastewater to disposal field
- Acquisition of disposal field and construction of effluent distribution system

Also, these systems would dramatically increase the operating costs of any land application treatment alternative. Furthermore, this type of alternative using drip irrigation subsurface disposal was found to be not cost effective in previous studies completed by the Township.

In addition, implementation of a community system would require the Township or another operating Authority to operate and maintain a community system in a similar manner to any other wastewater treatment plant. This operation would include a central ~~pumping station, community treatment system and septic drain field.~~ Although there are no major operating systems associated with this system, it still must be checked on a daily basis to assure that all systems are functioning properly. Also, the pumping station must be equipped with alarms and backup services to assure operation during emergency conditions such as power failures. It is our understanding that Upper Milford Township does not wish to incur this additional burden unless there are no other alternatives available for providing sewer service.

Therefore, implementation of this type of alternative would not be practical or cost effective.

3.0 Require Development of an Alternative Using Community Systems to Service South 7th St. Extension Area

Use of a community system in this area of the Township was not feasible due to the proximity of the Borough of Emmaus collection system. As outlined in Alternative #8, a gravity manhole is located at the boundary of the proposed sewer service area. Therefore, sewer service is readily available to this area simply by extending existing gravity sewers.

Use of community type treatment systems is normally implemented in areas where central collection sewer service is not practical due to its proximity to the existing collection/interceptor system. The costs for extending the existing collection system would not be practical due to cost or other impacts. Since the South 7th Extension area is adjacent to the existing sewer service area, these types of considerations would not be applicable.

In addition, implementation of a community system would require the Township or another operating Authority to operate and maintain a community system in a similar manner to any other wastewater treatment plant. This operation would include a central



Mr. DanDeLong
December 18, 2003

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pumping station, community treatment system and septic drain field. Although there are no major operating systems associated with this system, it still must be checked on a daily basis to assure that all systems are functioning properly. Also, the pumping station must be equipped with alarms and backup services to assure operation during emergency conditions such as power failures. It is our understanding that Upper Milford Township does not wish to incur this additional burden unless there are no other alternatives available for providing sewer service.

Since gravity sewer service is readily available for this area, implementation of a community system is not warranted. Such a system would place an undue burden on the Township to assure proper operation of this type of system.

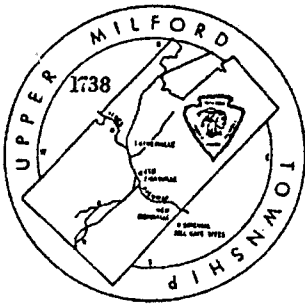
If you have any questions, do not hesitate to contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Karl E. Schreiter Jr.', written over the typed name below.

Karl E. Schreiter Jr., PE, DEE
President

Cc: R. Benner, Shoor DePalma
J. Boldaz, Shoor DePalma



**UPPER MILFORD TOWNSHIP
PLANNING COMMISSION**

PO Box 210 ~ 5831 King's Highway South
Old Zionsville, PA 18068
Phone: (610) 966 - 3223 ~ Fax: (610) 966 - 5184
E-mail: info@uppermilford.net
Web: <http://www.uppermilford.net>

March 3, 2004

Susan J. Smith, Chairman
Board of Supervisors
Upper Milford Township
P. O. Box 210
Old Zionsville, PA. 18068

RE. Sewage Facilities Act 537

Dear Chairperson Smith:

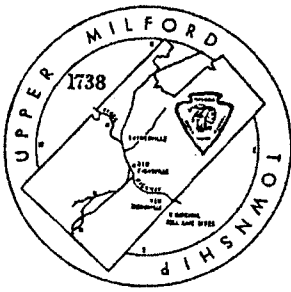
At a meeting held on March 1, 2004, the Upper Milford Township Planning Commission made a motion to recommend the Board of Supervisors approve this revised Act 537 Sewage Facilities Plan and send to DEP for their approval.

Sincerely,

A handwritten signature in cursive script that reads "Maryann Stauffer".

Maryann Stauffer
Secretary

CC: BOS
Twp. Mgr.



**UPPER MILFORD TOWNSHIP
PLANNING COMMISSION**

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Web: <http://www.uppermilford.net>

March 12, 2004

Ms. Susan J. Smith, Chairman
Board of Supervisors
Upper Milford Township
Box 210
Old Zionsville, PA. 18068

Re. Act 537 Sewer Plan

Dear Chairperson Smith:

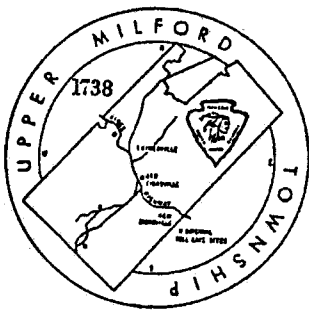
At a meeting held on March 1, 2004, the Upper Milford Township Planning Commission recommended the Board of Supervisors approve the Act. 537 Sewer Plan and forward it to the Dept. of Environmental Protection for their approval.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Maryann Stauffer', is written over the typed name.

Maryann Stauffer
Secretary to the
Planning Commission

CC: Board of Supervisors
Township Manager



**UPPER MILFORD TOWNSHIP
BOARD OF SUPERVISORS**

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Chairman
Susan J. Smith

Vice-Chairman
Daniel J. Mohr

Supervisor
Henry H. Kradjel

August 1, 2005

Ms. Sue Rockwell
Lehigh Valley Planning Commission
961 Marcon Boulevard, Suite 310
Allentown, PA 18103-9397


*Copied
8/1/05
K*

Hand Delivered

Dear Ms. Rockwell:

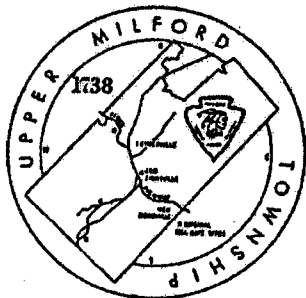
Attached for your information is a copy of the Upper Milford Township Act 537
Plan Revision dated July 2005.

Sincerely,


Daniel A. DeLong
Township Manager

DAD:ck

Cc: Board of Supervisors



**UPPER MILFORD TOWNSHIP
PLANNING COMMISSION**

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CC: BOS
D. DeLong
B. Miller
M. Fisher

August 30, 2005

Susan J. Smith, Chairman
Board of Supervisors
Upper Milford Township
P. O. Box 210
Old Zionsville, PA. 18068

RE. ACT 537 Recommendation

Dear Chairperson Smith:

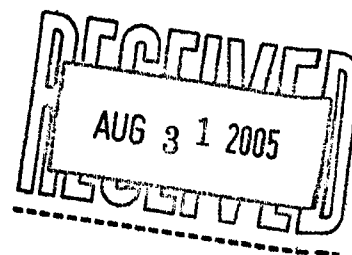
At a meeting held on August 29, 2005, the Upper Milford Township Planning Commission discussed the proposed Sewage Facilities Act 537 and after much deliberation, the following recommendation was made:

In so much as, Upper Milford Township recognizes the urgency of addressing the public health issues in the Village of Vera Cruz, the Planning Commission, supports submittal of the Act 537 Plan, which defines the service area established by the needs survey defined by this plan. The Planning Commission however, requests that an amendment be made to the resolution, to show responsiveness to the the public comments made at the public meeting, as required by the Act 537 process. Therefore, the Planning Commission recognizes and will support Alternative #4, which is providing Sewer Service to the Leibert Creek Basin through the LCA Route 29 Pumping Station, if Alternative #4 is the least environmentally problematic and the least costly upon the design investigation of the other Alternatives #5 and #7. (See attached copy)

Sincerely,

Maryann Stauffer
Secretary to the
Planning Commission

CC: Board of Supervisors
Township Manager
Township Solicitor





Alternative #4 – Provide Sewer Service to the Leibert Creek Basin through Lehigh County Authority Route 29 Facilities using Pumping Stations - Under this alternative, the areas within the Leibert Creek drainage basin including the Village of Vera Cruz will be provided sewage service. A combination of gravity collection systems, low-pressure systems and pumping station network would be constructed to provide sewer service to this area. A proposed pumping station would be located near the intersection of Vera Cruz and Mill Roads. The force main would extend from the pumping station along Mill Road to Shimerville Road, to Salem Drive. The force main would terminate on Salem Drive at the LCA MH #JS-1.

Alternative #5 – Provide Sewer Service to the Leibert Creek Basin through new WWTP with stream discharge to Leibert Creek -- Under this alternative, the areas within the Leibert Creek drainage basin including the Village of Vera Cruz. A combination of gravity collection system and pumping station network would be constructed to provide sewer service to this area. A central treatment plant would be constructed in the Vera Cruz area. Treated effluent from the treatment facility would be discharged directly to Leibert Creek in the vicinity of the WWTP.

Alternative #6 – Provide Sewer Service to the Leibert Creek Basin through new WWTP with land application discharge – Under this alternative, sewer service would be provided to areas of the Leibert Creek drainage basin. A central treatment plant would be constructed in the Vera Cruz area. Treated effluent from the treatment facility would be disposed of using either spray irrigation or drip irrigation distribution systems.

Alternative #7 – Provide Sewer Service to the Leibert Creek Basin through Lehigh County Authority Route 29 Facilities using Low Pressure Collection Sewers- Under this alternative, the areas within the Leibert Creek drainage basin including the Village of Vera Cruz will be provided sewage service. A low-pressure system would be constructed to provide sewer service to this area. The low-pressure system would terminate on Salem Drive at the LCA MH #JS-1.

Alternative #8 – Extending Sewer Service to the South Fifth St. Area - Under this alternative, gravity sewers would be extended along South 5th Street. Sewers would also be extended to provide sewer service to Plain View Rd, Columbus Drive, Knoll Wood Drive and Hillary Drive. The sewers would connect to the Borough of Emmaus collection system at Borough MH #C-1 located on South 5th St.



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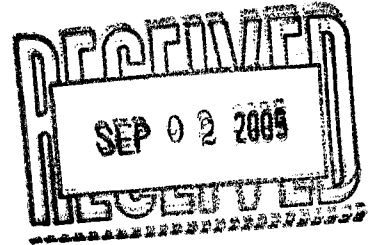
IRA J. FARO
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TERRY J. LEE
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MICHAEL N. KAISER
Executive Director

September 1, 2005



Copy:
B. O'S.
D. DeLong
B. Miller
B. Benner
K. Schretter

F. Uist
K. Shaak
P.C.

Mr. Daniel DeLong, Manager
Upper Milford Township
P.O. Box 210
Old Zionsville, PA 18068

Re: Upper Milford Township - Act 537 Plan Revision, July 2005

Dear Mr. DeLong:

The Lehigh Valley Planning Commission previously reviewed the Township's draft Act 537 Plan Revision dated September 2003. We completed our review of this draft plan in November 2003. A copy of the review letter is attached. The Township revised the plan in July 2005, which continues to propose public sewers for the Vera Cruz area. The plan provides additional detail on costs of the proposed alternative and minor changes to the proposed service area. Our previous comments from November 2003 remain relevant to the July 2005 plan.

Please call me if you have any questions.

Sincerely,

Susan L. Rockwell
Senior Environmental Planner

SLR:kms

cc: Jim Ridgik, PA Department of Environmental Protection



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November 21, 2003

Mr. Karl Schreiter, Jr.
Schreiter Engineering Associates, Inc.
7 Raleigh Drive
Downingtown, PA 19335-1103

***Re: Act 537 Review – Draft Official Sewage Facilities Plan
for Upper Milford Township, Lehigh County***

Dear Mr. Schreiter:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on November 20, 2003, reviewed the above-referenced plan. Our review was based on the adopted plans and policies of the LVPC and provisions of the Pennsylvania Sewage Facilities Act (Act 537). We offer the following comments.

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A portion of the Vera Cruz area is recommended for public sewer service in our *Water Supply and Sewage Facilities Plan*, December 1995. Providing public sewer service to this area would be consistent with the Plan. Providing sewer service to on-lot problem areas not recommended for service would be consistent provided that a detailed solution analysis is completed identifying this alternative as the most cost-effective, long-term option and that the system capacity is designed to serve only the areas of need. We believe the alternatives to sewers should be more thoroughly evaluated in the plan,

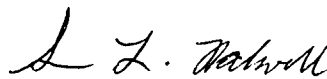
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Page Two

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The Golf Circle area is located in an area recommended for sewer service in our 1995 Plan and the provision of sewers is consistent with the Plan. We previously reviewed the proposal for public sewers for the South 7th Street study area as a new project in the LCA Preliminary Capital Plan 2004-2008. This project is in an area recommended for on-lot sewage disposal in our Plan. According to our Plan, areas experiencing malfunctioning on-lot systems should undergo a complete alternatives analysis including on-lot alternatives. This project would be consistent with LVPC policies if the Township's Act 537 plan identifies public sewers for the area as the most cost-effective long-term option. The plan does not evaluate other alternatives and should be amended to evaluate other possible solutions. Establishment of a sewage management program is consistent with our Plan for all on-lot problem areas. A sewage management program would provide for the proper operation and maintenance of both existing and new systems through regular pumping and inspection in these areas.

Please call me if you have any questions.

Sincerely,



Susan L. Rockwell
Senior Environmental Planner

cc: Daniel DeLong, Township Manager
Kate Crowley, Water Management Program Manager,
PA Department of Environmental Protection