

DRAFT
Act 537 Sewage Facilities Plan Update
Doylestown Township
Questions from the Public Comment Period with Responses
(prepared 11-10-23, updated 11-28-23)

STATEMENTS

1. Multiple residents are considering this an unfair financial and mental burden considering recent tornado damage, COVID and the current economy. Some asked for consideration to delay it beyond the 5-year planned project list.
2. Several requests were made to not force the public portion of the project costs on them, as they have a functioning septic system and it would be a severe hardship to pay for even the public portion let alone the private portion.

QUESTIONS

3. What is requiring the public sewer project in these neighborhoods? Has an evaluation been done that shows poor performance of septic tanks in this area?
 - Areas shown in the 5-year projections were based on the history of issues with on-lot systems as well as the Health Department’s classification of marginal soils for portions of these areas. Based on information gathered from the Health Department’s records, the following areas had reports with the Health Department since 2005:
 - Pine Valley Road/Pine Vale Drive/Shady Grove Circle/Buttwood Lane/Sycamore Way Areas: 25 properties already connected to public sewer, 2 properties connected to public sewer in 2022 (not yet reflected in the 537 Plan Update), 17 properties with on-lot systems replaced by the same or new type (e.g. sand mound system), 3 properties in the process of replacing the on-lot system, 8 properties with some type of repair to the existing on-lot system (pipe replacement, tank replacement, distribution box replacement, etc.), and 1 property requesting soil testing.
 - Chestnut Valley Drive Area: 2 properties already connected to public sewer, 1 property connected to public sewer in 2022 (not yet reflected in the 537 Plan Update), 7 properties with on-lot systems replaced by the same or new type (e.g. sand mound system), and 5 properties with some type of repair to the existing on-lot system (pipe replacement, tank replacement, distribution box replacement, etc.).
4. Have soil studies been performed in the area? If so, when and what were the results?
 - No soil studies have been performed by the Township in the 5-year project areas. The Health Department has classified these soils as “marginal” in some project areas.
5. Has a stormwater study of runoff in the area been performed? If so, when and what were the results?
 - Yes. “Illicit Discharge Detection & Elimination Program” reports are available on the Township’s website from 2009 to 2023. From the main page, click “Information” at the upper right side of the screen, then click “Stormwater Management” on the popup screen, and finally scroll towards the bottom of the screen where “Presentations” are listed.

6. Why is the public sewer project not covered by our taxes?
 - It is not appropriate to utilize taxes paid by the entire Township to bring public sewer only to certain residents. There have been several public sewer projects over the years in the Township and the same procedures followed for those projects must be followed for future projects.
7. If the area has not encountered problems with on-lot systems to date, what are the chances of problems in the future?
 - The project areas all have at least one or two properties that have connected to public sewer by running a low-pressure line down the street to connect to the nearest public sewer. This would indicate there have been some issues with on-lot systems in these areas. PADEP estimates the average lifespan of a septic system at up to 40 years, though proper maintenance may extend that.
8. What cost is a homeowner directly responsible for?
 - The estimated costs of the potential projects to start in the 5-year period are shown on Tables 6-1 through 6-5. They are summarized on Table 6-8. The estimates included in the 537 Plan Update at the time of the public comment period included the grinder pumps in the overall project costs, as if they would be bid and installed as part of the public portion of the project. After further discussions with the Township, this will not be the case. Only the sewer mains (the portion generally to be located in the public right-of-way) will be part of the public project, and the grinder pumps would be installed when/if the individual property owner decides to hire a plumber to connect to the public sewer. Therefore, the cost estimates have been revised (copy attached) to break the grinder pump cost out as a separate private cost. In doing so, this generally decreased the cost estimates by \$4,000 to \$5,000 per EDU. The property owner would be responsible for paying the “public cost per EDU” at the completion of the project, whether or not they decide to connect to the public sewer. The “private cost per EDU”, which is the cost of the grinder pump installation and the tapping fee, would only be due when/if that property owner actually connects to the public sewer.
9. Will loans be available to assist property owners with making payments for the public sewer project? If yes, at what terms?
 - Yes. All possibilities will be investigated at the appropriate time when a project moves forward, but this would most likely be a PENNVEST loan, and the Township would apply for the loan upfront and the loans would be assigned to the individuals at the completion of the project. The terms of the loan would be discussed with the affected property owners when it is decided that a project will move forward, as it would not be appropriate to provide this information now when it could change in the future.
10. Will there be any Federal or State grants available to help defer some of the public costs?
 - The Township will investigate all possible Federal and State grant opportunities that are available at the time of a project. It is not possible to know which grants and what amounts will be available at the time of a project that is multiple years away.
11. Due to the age of the homes and possible issues with internal plumbing, would the actual connection costs to public sewer be higher than shown on the cost estimates?
 - A dwelling’s potential internal plumbing issue(s) is not addressed in the cost estimates, though the existing sewer line exiting a dwelling would only have to be intercepted and redirected to enter the proposed grinder pump system. From there, the grinder pump would convey the wastewater through a small diameter pipe to be installed by the plumber along with the grinder pump, and connect that to the public sewer line to be installed in the public right-of-

way. These costs are included in the grinder pump cost estimate. Costs not included in the grinder pump estimate is the abandonment of the existing on-lot system and any electrical upgrade that might be necessary if a dwelling has an inadequate service.

12. Is there anything to be done to maximize the life span and efficiency of an existing septic system, other than routine maintenance/pumping?
 - See the EPA's "A Homeowner's Guide to Septic Systems" at the following link:
<https://www.doylestownpa.org/media/1908/homeowner-s-guide-to-septic-systems.pdf>
13. Why were individual notices of the projects not sent directly to the affected property owners?
 - The 537 Plan Update is a Township-wide document. Per PA Department of Environmental Protection regulations, the requirement for public notice of a 537 Plan Update is to advertise it in the local newspaper. If and when any of the individual projects move forward, individual property owners will be contacted well in advance and meetings with those affected owners would be scheduled. The Township also had notices for the 537 Plan Update in the Friday News Announcements and on their website.
14. Why is the focus not on PFOS and drinking water quality?
 - This would be a separate issue, and these sewer projects do not detract from water quality standard projects.
15. Is there a due date for the payments that homeowners will have to make?
 - The public portion of the costs would become due at the completion of a project. That said, loans and other methods to defer costs would be explored when and if a particular project is set to move forward.
16. Will there be considerations for those who have new septic systems already?
 - If a particular sewer project moves forward, any parcel within that project area not already connected to public sewer would be responsible for paying their share of the public costs. The advantage to having a newer and functioning on-lot disposal system is that property would not need to pay the private connection costs. When the on-lot system fails in the future, the public sewer connection would be ready for connection, at which time the tapping fee would be required and the property owner would hire a plumber to install a grinder pump system and lateral connection to the public sewer main.
17. Figure 5-4 of the 537 Plan Update does not show the gas line that runs through the neighborhood near Chestnut Valley Drive.
 - This is only a conceptual plan. When an actual design begins for a project, plans will be developed that will show existing underground utilities and how proposed pipelines will avoid and protect existing features.
18. How will the public sewer affect the approximate 12" thick concrete base in Chestnut Valley Drive, which has had a history of deterioration due to the springs underneath the area, until the concrete subbase was installed?
 - This would be investigated when an actual project moves forward. It would be premature to speculate how it would be dealt with at this time, though possibilities to minimize pavement disturbance would certainly be looked into such as directional drilling.

19. Why are a portion of the funds for the public sewer costs not coming from new building/expansion projects that increase the Township's population?
 - See response to Question #6.
20. Can a final summary of the plan be created that would explain all of the nuances of the public sewer projects to the property owners in layperson's terms?
 - Yes, this would be done at the time that a project actually moves forward into a design phase. In addition, at the same time meetings would be held with the affected property owners to have open discussions.
21. If a homeowner has a failing on-lot system in the next few months, but the public sewer project is not proposed to commence for another 1-3 years, what is that property owner to do?
 - The property owner should discuss their options with the maintenance provider of the on-lot system to determine the appropriate course of action.
22. Several expressed concern for newly planted trees following the tornados, and whether they would be negatively impacted by a public sewer project.
 - This would be a topic for when a project moves into a design phase, but generally speaking proposed low pressure sewer mains are installed at minimum cover which minimizes trench width and allows obstructions such as trees to be avoided/protected through the project.
23. How will a public sewer project be sequenced with the repaving of roads, considering Shady Grove Circle and Buttonwood Lane are currently being repaved and Pine Valley Road is scheduled.
 - The Township would evaluate this when a project is set to move forward.
24. Can a meeting be scheduled with affected residents, the Township, the Sewer Authority and engineers to discuss the projects?
 - Yes, once it is known that a particular project is moving forward, these meetings will be scheduled.
25. Could the private connection of the dwellings to the public sewer be included in a bid, for all those that want to be connected at that time, rather than each property owner having to hire their own plumber?
 - This could be considered, though it does bring certain complexities into the project.
26. How soon should public sewers be brought to these neighborhoods to avoid health and safety concerns, and would upgrading existing on-lot systems satisfy these concerns?
 - This would be a determination made by the PADEP or the Health Department.
27. If a household opted out of connecting to the public sewer, would they still be required to pay anything?
 - Yes, they would be required to pay their share in the public costs of the project (not the grinder pump costs nor the tapping fee).
28. Can the residents be updated concerning the public sewer project on a regular basis by email?
 - When it is decided that a certain public sewer project will move forward, these updates can be established.
29. Are our State and Federal representatives aware of the project, and could they assist in any way?
 - State Legislators are aware of the projects. They could assist with applications for grants.

30. How much of an increase in project cost is estimated for each passing year?
- A 5-year escalation factor (11.5%) was applied to the cost estimates in the 537 Plan Update. This is based on using historic inflation values specifically for construction projects. Generally speaking, excluding the past few years when price increases were far from normal, a cost increase of 2.5% per year could be expected.
31. Has a real estate company been consulted to advise the Township regarding the effects of selling a home with the uncertainty of the public sewer projects?
- This has not been done at this time.
32. Who is responsible for the repair of the grinder pump station and lateral located on private property? Is there any guarantee of this for a specified time?
- This would be the responsibility of the property owner. BCWSA would be responsible for the maintenance of the public portion once the project is dedicated, which would be the low pressure mains located in the public right-of-way (generally speaking, in the roads). Any guarantee for the private portion would depend on the plumber that is hired by the property owner to do that installation. The grinder pump itself will typically have a guarantee period.
33. If the homeowner cannot afford the project costs, what are the penalties?
- A lien would be placed on the property. Once the assessment is paid in full, the lien will be removed.
34. Can the project anticipated milestone dates be more specific?
- These dates are intentionally shown in “number of calendar days”, as the times technically would begin when PADEP approves the 537 Plan Update which is unknown at this time. These timeframes are subjective and could be lengthened at the Township’s discretion unless PADEP would require certain projects to move ahead for public health and safety reasons.
35. If grants are not able to cover the overall project costs, shouldn’t a municipal bond be created to pay for them?
- This is not an option. See response regarding the use of taxes to pay for public sewer projects (Question #6).
36. Why was a comprehensive plan not developed by an independent engineering firm?
- Carroll Engineering Corporation prepared the 537 Plan Update on behalf of the Township, with the Bucks County Water & Sewer Authority covering the engineering costs of the Update. The 537 Plan is a Township-wide document, with this Update focusing on existing developments not yet connected to public sewers. The Authority did not make any decisions as to which areas would be shown in the 5-year, 10-year or ultimate categories.
37. Why was Area A not prioritized over some of the others in the 5-year category?
- As this is a very large area, it was thought to be too aggressive from a timing perspective to put this in the 5-year category. However, it is noted in the 537 Plan Update that the planning of this project would likely begin within the 5-year period, with the project completion in the 6 to 10 year period. For this reason, a cost estimate for this project was included in the 537 Plan Update.

38. The Opinion of Probable Costs in the 537 Plan Update, specifically Table 6-3, appears to be a bill of materials and it is not apparent that installation costs are included.
- These cost estimates include the cost of installation, which is factored into the unit prices.
39. What paperwork would need to be filed by property owners including permits, contracts, etc., including fees?
- For installing a grinder pump system, a plumbing permit with the Township would be required. The fee schedule can be found on the Township website, though the fees can change yearly.
40. Is the cost of every home going to be assessed differently?
- If a property is located in the project area and not already connected to public sewer, it would have an equal share in the public construction cost of that project. It would be based on the total public portion of the construction costs divided by the number of properties. The private portion of the costs would only become necessary if the property owner chooses to physically connect to the public sewer and abandon their on-lot system.
41. Why is a low-pressure sewer system that utilizes grinder pumps being proposed rather than a gravity system?
- While a small percentage of dwellings in the project areas may be able to connect to existing sewer with a gravity lateral, the vast majority cannot. There are multiple factors, including the elevation of the nearest existing sanitary sewer compared to the topography of the project area, low points along the route leading to the existing sewer such as streams, and the gravity sewer must maintain a minimal slope so that the pipe is gaining roughly a half of foot of vertical elevation for every 100 feet of horizontal installation. In addition, the low-pressure system requires smaller diameter pipe which allows for narrower trenches and lower installation costs, as well as maintaining a minimum trench depth of 4 feet which is expected to avoid costly rock excavation for the most part.
42. Has there been a town in Pennsylvania that has successfully opposed DEP so that the town's sewer initiative was discontinued? If so, how were they able to postpone it?
- Not to our knowledge. DEP has the authority to enforce connections to public sewer where they deem necessary.
43. If a property is already connected to public sewer but within the limits of a public sewer project listed in the 537 Plan Update, will this property have to share in the public portion of the project costs?
- No, this property would be excluded from the project.

The following questions are specific to the Pine Valley Road area:

44. Are the individual homeowners solely responsible for the total estimated cost of approximately \$50,000, or will the Township be assuming any portion of the cost? If so, how much of the estimated cost is the Township assuming?
- The approximate \$50,000 estimate per parcel included the private costs. With the revised breakdown of the cost estimates, the property owner in this particular project areas would be required to pay \$29,100 for the public costs, and if they connect to the public sewer, pay another \$16,400 for the private costs, for a total of \$45,500 per EDU. Note that all costs are estimated except for the BCWSA tapping fee. Any grants would reduce the public portion of the costs. The Township would not be assuming any costs.

45. Does the approximate \$50,000 cost include connection to the individual household, or is connection an additional cost? If not included in the \$50,000 estimate, what is the estimated additional cost to connect?
- This includes the private portion which is the grinder pump and connection of the house to the public sewer.
46. For residents who remain on septic, would they pay the same amount for installation as the to-be-connected residents?
- No, they would not pay the private portion of the costs until they actually connect to the public sewer.
47. Is the approximate \$50,000 estimated in today's dollars, or is inflation included in the calculations? If in today's dollars, what is the estimated cost (including inflation) for the 5-year plan?
- This includes a 5-year estimated escalation factor in the cost estimates.
48. Will affected households be required to pay a monthly or quarterly sewage bill/fee? If so, what is the average monthly/quarterly/annual bill per household?
- Yes, if the household connects to the public sewer, they would be required to pay a monthly BCWSA sewer usage fee. For 2023, if a property has an on-site well, the usage fee would be a flat rate of \$52.69 per month. This is subject to change on a yearly basis.
49. Is there still a monthly bill, charge, or fee if the household is not connected? If so, how is it assessed (e.g. "frontage," amount of curb, property size, etc.)?
- No. If a property does not connect to the public sewer, they would only be responsible for their share of the public portion of the construction costs.
50. As far as any associated loans, are there annual percentage rates? If so, what is the anticipated and average rate?
- If and when a public sewer project moves forward into a design phase, this information will be provided.
51. Are grants to the Township (to reduce costs to homeowners) anticipated? If so, how much is estimated/anticipated?
- Yes. It is not possible to estimate the amount of potential grants at this time.
52. Will our current taxes cover this (the same as other infrastructure expenses)? If not, why not?
- No. See response to Question #6.
53. Will there be any tax implications? (e.g. effect on any local/property taxes, tax deductions, rebates, etc.)?
- No, not to our knowledge.
54. Are there any other taxes, fees, charges, etc. (initial or recurring) associated with sewer installation, maintenance, repair, and operation, that the individual homeowners will be responsible for?
- The property owner would be responsible for the necessary maintenance, repair and operation of the grinder pump and lateral on an "as needed" basis.

55. What are the average annual maintenance costs, if any?
- This information can be obtained and provided at a later time if and when a project moves forward.
56. Who is responsible for maintaining the sewer and household connections after installation?
- The property owner.
57. Are there any annual or recurring service/inspection requirements? If so, what is the estimated cost?
- If a public sewer project proceeds and a property owner chooses to remain on their on-lot system and not connect to the public sewer, they would continue to be responsible for complying with the septic management program.
58. Will residents with existing septic systems be required to remove their retired (otherwise new and/or operational) systems once connected? If so, how much is the average cost to remove/remediate?
- If they choose to connect to the public sewer, then yes, they would be required to abandon the existing on-lot system properly. See the following link at the DEP website for more information. Costs will vary depending on the timing and the size of the existing system.
<https://www.dep.pa.gov/Business/Land/Tanks/Pages/Storage-Tank-Closure.aspx>
59. If not required to be removed, would this be a liability (either physical or administrative, to include financial) with regard to insurance, or when attempting to sell the property?
- The existing on-lot system would be required to be closed in place or removed if a property connects to the public sewer.
60. Does having access to the sewer (without being connected) increase home/property value? If so, how much of an increase (%) is estimated?
- This cannot be estimated at this time.
61. Does being connected to a sewer increase home/property value? If so, how much of an increase (%) is estimated?
- Generally speaking, yes. The increased property value cannot be estimated at this time.
62. If selling the home prior to installation, will homeowners be required to disclose to the purchaser(s) that they will be responsible for the estimated amount at a future date?
- Yes, if there is a Township ordinance identifying specific parcels as part of a public sewer project at the time.
63. Will other utilities, such as public water, buried electric, etc. be installed at the same time? If so, is there any additional cost for those utilities, either installation, maintenance, or recurring billing? If billing is recurring, would residents still be charged a bill/fee if they remain on a well, instead of using public water?
- This is not planned at this time.
64. What is the consequence for residents unable/unwilling to pay? Is there a regulation that covers this? If so, could you please provide the reference?
- See response to Question #33.