

# Carrolltown Borough Municipal Authority

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September 21, 2017

Environmental Quality Board

P.O. Box 8477

Harrisburg, Pennsylvania 17105-8477

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IRRC  
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**OBJECTION TO PROPOSED RULEMAKING to**

**25 PA. CODE CH. 109 by**

**CARROLLTOWN BOROUGH MUNICIPAL AUTHORITY**

To Whom it May Concern:

Carrolltown Borough Municipal Authority is adamantly opposed to the above referenced proposed rulemaking. The proposed added annual fees additionally strain the already tight budgets of this Authority and pose a significant burden that will need to be passed on to our customers and will be have to done in a manner that will not affect their monthly rates but will be listed as a state DEP fee only in addition to their regular monthly/yearly charges for services.

Through reviewing the proposed rulemaking, it appears unclear how the fee will be assessed. If the fee is to be imposed by population, that can mean something completely different than being imposed by customer, account or even transient. For some authorities, assessing the fee by "population" impractical and unsustainable.

Additionally to the proposed annual fees, the increase in permit application fees is also an unnecessary additional obstacle to renewing infrastructure across the Commonwealth of which Authorities have been faced with extremely high financial unfunded mandates that seem to roll out every year for the past decade. Moreover, now faced with funding potential shortfalls of the states organizations leads only to believe that the oversight and funding of the Department is the function of the Commonwealth and any funding shortfalls should be addressed as such with the ability to reduce services as all municipal and local governments have had to do for many years now. To propose encumbering our customers or population at large with additional increases passed through the water purveyor is troubling and unreasonable.

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We do feel as if the DEP does provide a valuable service as their training sessions and outreach programs have been very beneficial to many authorities and operators in the past. However the department has transitioned itself from education and outreach to a over reach of regulation and compliance only which is unsuccessful for any department to exist within the Commonwealth. In the event the state is unable to support its own departments with what it currently has then this authority and many others we have spoken to are in favor of dissolving the department by large and allowing full control to be that of the EPA! The state is failing the municipal authorities along with each and every constituent of this commonwealth. These are the citizens that elect and support all of our governmental agencies that the commonwealth is choosing to penalize for its lack of fiscal responsibility or resolving their shortfalls through attrition.

Thank you for hearing our concerns. If you have any questions please feel free to contact me at the Carrolltown Borough Municipal Authority Office.

Sincerely,

  
Carrolltown Borough Municipal Authority

by: Lonnie Batdorf, Manager

cc: Carrolltown Borough Municipal Authority Board Members

Dan Carbaugh, P.E. – Keller Engineers

Dave Cunningham, P.E. - Keller Engineers