

Reasoning for Ferguson Township Dissent on Expansion of the Regional Growth Boundary/ Sewer Service Area.

Managing growth in the Centre Region has been an integral focus of each of the three adopted Comprehensive Plans. From the identification of a Preferred Growth Area (PGA) in 1976 to the adoption of a Regional Growth Boundary (RGB) in 2000, the Centre Region elected officials have repeatedly chosen to guide future growth of the community by agreeing to establish a regional boundary.

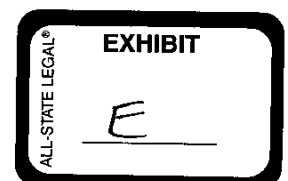
A major goal of the 2000 Plan was adoption of "A Regional Growth Boundary that encourages and directs the majority of the future growth." According to the plan, "This boundary closely relates to the present and future locations of public services and facilities that can be provided to the residents in a cost effective manner. In addition, zoning and other land use tools will be developed to clearly strengthen the boundary and the recommended development activities within this area. The Regional Growth Boundary does not prohibit growth in the outlying areas, but encourages a level of growth compatible with the character of the rural landscape."

As with previous planning efforts, the Plan recommends that "areas outside of the RGB be the focus of rural, open-space, and farmland preservation efforts" and indicates that "municipal regulations should be revised to require that the development carrying capacity of a site outside of the RGB be determined by on-lot sewage disposal system needs. Use of on-lot systems will prevent the costly extension of public sewer service to rural areas."

In 2006, after a lengthy development and discussion process, the Centre Region Council of Governments adopted a regional Act 537 Sewage Facilities Plan that established a sewer service area that was consistent with the Regional Growth Boundary (RGB) in the adopted regional comprehensive plan; further strengthening the commitment to this boundary as a tool for guiding future growth.

The Township's position on the recent request by Harvest Fields and the Calvary Baptist Church to expand the RGB and Sewer service area is therefore not related to the proposed use, the size or the location of site in relation to other existing development or the present terminus of sewer lines that could be extended. Rather, the Township's focus has been on whether the RGB/SSA must be

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expanded to accommodate additional growth for the region. We believe that the answer to this question is no for the following reasons:

1. The proposed development of the property by Harvest Fields/Calvary Baptist Church can occur without expanding either the RGB or the SSA. A DEP approved, environmentally sound, on-lot septic system has been approved for the development of the property based on the stated use. The Centre Regional Planning Commission (CRPC) noted at its June 7, 2012 meeting, "that the desired use of the property as a church and associated uses could be developed with an on-lot septic system that would not require extension of public sewer."
2. The June 2012 Regional Development Capacity Report (REDCAP) completed by the Centre Regional Planning Agency "concludes that there is adequate land to accommodate growth in the RGB and sewer service area for the foreseeable future." The CRPC also noted that there are other properties in the RGB/SSA that could accommodate the intended use with existing infrastructure.
3. The report (REDCAP), which also suggests the potential for UAJA treatment capacity to support more development than previously anticipated, should not reduce the region's efforts to manage growth and preserve farmland or open space. Instead, it should highlight the significant amount of land (4,000+ acres) already designated for the accommodation of the region's anticipated growth for several more decades; with 506 acres located in Harris Township alone. Thus demonstrating that additional land does not need to be included at this time.
4. In addition to decisions regarding the cost and capacity of the region's sewer service, the RGB is part of a growth management strategy for the region that includes the ability to cost effectively provide other public services such as police, fire, EMS, parkland and transit. Although the DRI report indicates these service providers have suggested that, at present, they have adequate resources to provide services to the proposed expansion of the RGB, they have not responded to the more relevant question regarding their possession of adequate resources to provide services to this development under the premise that all currently vacant land in the existing RGB (4,000+ acres) has been built out. Consideration of this question would likely result in a different response given the amount of growth and development anticipated to occur on this vacant acreage

within the coming decades. [In Ferguson Township alone, this is expected to be 3715 new residents and nearly 1500 new dwelling units by the year 2030] Likewise the question is not about whether there is adequate conveyance and treatment capacity today but rather does the existing conveyance system and treatment plant have the ability to convey and treat the sewage from the development associated with the requested DRI in addition to the build out of the currently vacant acreage within the existing RGB.

The answer to this question is no.

5. There is an old saying that the battle is fought where the line is drawn. If we as a region move the line this time we will fight the RGB battle somewhere else another day, just kicking the can down the road. Is the RGB worth standing up for or is our plan for developing the region to ignore the sound planning concepts we agreed to in 2000 and in 2006 when we adopted growth management policies?

For the above stated planning reasons supported by sound regional planning policies Ferguson Township does not concur with the expansion of the Regional Growth Boundary or the Sewer Service Area.