

6.1 CONSISTENCY EVALUATION

In addition to obtaining consistency with municipal objectives, it is important to evaluate the consistency between the wastewater management alternatives selected in this Act 537 Plan and the objectives of county, state, and federal policies and plans. As required by the Pennsylvania Sewage Facilities Act, this Act 537 Plan is evaluated for consistency with each of the following policies and plans.

6.1.1 Comprehensive Plans

As mentioned in Chapters 1 and 4, an update to West Hanover Township's Comprehensive Plan was adopted in 2005. This document was consistently utilized during the formulation of this Act 537 Plan. All wastewater management alternatives evaluated in this Act 537 Plan have been developed based on a desired consistency with the *West Hanover Township Comprehensive Plan Update Report*. Alternatives developed in this Act 537 Plan will meet the goals of the Comprehensive Plan related to sewage facilities.

The Plan is also consistent with the Dauphin County Comprehensive Plan. Specifically, the Plan is consistent with the following sections of the Dauphin County Comprehensive Plan: Chapter 3: Natural Resources; Chapter 9: Solid Waste Management (p. 9-47); Chapter 11: Environmental Goals and Objectives (p. 11-3), Community Facilities and Services Goals and Objectives (p. 11-7); Chapter 12: Industrial Land Use (p. 12-7); and Chapter 14: Sewerage Services (p.14-4), Public Water Supply Services (p. 14-5), Stormwater Management (p. 14-6).

The Future Land Use Map from the Dauphin County Comprehensive Plan and the following maps from the Tri-County Regional Growth Management Plan are included as Appendix L: Map 5-1: Development Patterns in Prime Agricultural Areas; Map 5-3: Vacant Buildable Parcel Study; Map 8-1: Sewer Service Area and Treatment Facilities; Map 8-2: Remaining Sewer Service Facilities; Map 8-3: Community Water Supply Systems; Map 8-4: Recreational Areas; Map 10-1: Community Service Areas; Map 10-2: Planned Growth Areas.

6.1.2 Municipal Wasteload Management Plans Under Chapter 94

WHTWSA annually submits a Chapter 94 report to DEP for its wastewater treatment facility. Wastewater flow projections used in this Act 537 Plan are consistent with those included in the Chapter 94 reports. The alternatives evaluated in this Plan are consistent with the Chapter 94 reports. The alternatives have been evaluated to ensure that hydraulic overloading of the existing public wastewater facilities shall not occur. The apparent organic overload condition anticipated to occur at the WHTWSA WWTP in 2009 shall be avoided by a rerating of the existing treatment facility or minor modifications to the facility when required. The Authority will continue to monitor available capacity at the pumping stations per Chapter 94 requirements and will upgrade stations nearing capacity as required.

6.1.3 Plans Developed Under the Federal Clean Streams Law, Water Quality or Clean Water Acts

No such plans have been located for this planning area.

6.1.4 Antidegradation Requirements Contained in Chapters 93, 95, and 102

The implementation of the wastewater treatment alternatives identified in this Act 537 Plan would not result in a conflict with the regulations of Chapter 93, Water Quality Standards; Chapter 95, Wastewater Treatment Requirements; or Chapter 102, Erosion and Sediment Control. Surface water discharges proposed by the alternatives in this Act 537 Plan are from the existing WHTWSA wastewater treatment facility. The discharges from the facility currently comply with the established water quality criteria and are anticipated to remain in compliance with the criteria if any of the alternatives developed for this plan are implemented. Any sewer system improvements constructed within West Hanover Township during implementation of the selected alternatives will have a soil and erosion sedimentation control plan prepared as part of the preliminary design

stage of the project.

6.1.5 Pennsylvania's Prime Agricultural Land Policy

The proposed alternatives providing public sewer service to the Houck Manor and Short Street Study Areas do not encroach on soils considered to be prime agricultural soils. Prime agricultural soils with hydric inclusions are located in the Holiday Park Study Area (Refer to Map 4 in Appendix J). However, the construction of sanitary sewers serving this area will result in minimal disturbance of these soils, as the majority of the facilities will be located within existing road rights-of-way.

6.1.6 Stormwater Management Plans Approved by the Department

Stormwater management is dictated by the West Hanover Township *Subdivision and Land Development Ordinance*. There are no inconsistencies with the Ordinance resulting from this Act 537 Plan. Any construction activities resulting from this Act 537 Plan will comply with the Ordinance.

6.1.7 Wetland Protection

Based on the National Wetlands Inventory mapping (see Map 3 in Appendix J), four (4) NWI wetlands are located near the proposed sewer extensions serving the Houck Manor and Holiday Park Areas. These wetlands are located along stream corridors in these areas. Sanitary sewers are typically placed along stream corridors to minimize pumping requirements. Therefore some wetland impacts potentially could occur during the construction of sanitary sewers serving Houck Manor and Holiday Park. A wetland delineation to identify and define the actual locations of wetlands and their boundaries should be performed during the design phase of any sewer extension. Placement of the sewer lines in or through wetlands or streams will be minimized.

6.1.8 Protection of Rare and Endangered Plant and Animal Species

The Pennsylvania Natural Diversity Inventory (PNDI) must be evaluated for adverse effects resulting from the implementation of the alternatives proposed in this Plan. Requests to the Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry, Pennsylvania Fish and Boat Commission, US Fish and Wildlife Service and Pennsylvania Game Commission were submitted for areas where new public sewage facilities are proposed. Copies of the requests and the appropriate responses are provided in Appendix E.

6.1.9 Pennsylvania Historic Preservation Act

The Pennsylvania Historic and Museum Commission (PHMC) must be consulted to identify the potential impact of the alternatives evaluated by this Plan. A cultural resource notice request was sent to the Bureau of Historic Preservation for a list of known historical sites and identification of potential impacts on known archaeological and historic sites within West Hanover Township by implementation of any of the wastewater alternatives. Copies of the PHMC correspondence are included in Appendix E.

6.2 PENNVEST CONSISTENCY

Because this Plan proposes the possible use of PENNVEST funds, the following social, recreational, and environmental issues must be considered in addition to the issues identified above.

6.2.1 Recreation and Open Space

The alternatives recommended by this Plan will not in itself create any new recreational or open space opportunities since the vast majority of the proposed sewer lines are within existing road rights-of-way. Additionally, any future modification of the existing wastewater treatment plant will be entirely within the current boundary, and there will not be additional land available to provide parkland for residents.

6.2.2 Air Quality

With the exception of the minimal dust and exhaust during the construction of new sewer lines, the proposed projects will not create any significant impacts on air quality.

6.2.3 Fish and Wildlife

The elimination of on-lot malfunctions and direct discharges of greywater to surface waters in the Planning Area will have a positive impact on aquatic life.

6.2.4 Wild and Scenic Rivers

There are no rivers in West Hanover Township considered Scenic by the PA Scenic Rivers Act.

6.2.5 Coastal Zone Management

There are no coastal areas within West Hanover Township.

6.2.6 Socio-Economic Impacts

The availability of public sewer service in the Houck Manor, Holiday Park, and Short Street Study Areas is considered necessary to maintain community viability, protection of public health, and secondarily to protect property investments.

6.2.7 Water Supplies

Water supplies, both public and private, will not be negatively impacted by the recommended alternatives of this Plan. In fact, water supplies may be positively impacted through elimination of pollution entering the water sources from existing malfunctioning on-lot systems and direct greywater discharges.

6.3 WATER QUALITY STANDARDS

The treatment alternatives identified and evaluated in Chapter 5 were selected based on their ability to provide adequate treatment of wastewater in West Hanover Township. Implementation of the structural alternatives serving the Houck Manor, Holiday Park, and Short Street Study Areas will not require new public wastewater treatment facilities as wastewater from these areas will be conveyed to the existing WHTWSA WWTP. The discharge of wastewater to the WHTWSA treatment facility at a volume above the current permitted capacity resulting in the required expansion of the facility is not anticipated within the 5- and 10-year planning periods.

6.4 COST ANALYSIS

Estimates of construction costs and overall project costs were presented in Tables 5-1 through 5-9 for all of the structural wastewater treatment alternatives discussed in Chapter 5. These costs, as well as operation and maintenance, present worth costs and estimated increases in user rates for each alternative are summarized in Tables 5-10 and 5-11. Please note that these costs are based on the existing EDU's in the area. Any growth or developer contributions would affect these estimates.

6.5 FUNDING ALTERNATIVES FOR HOUCK MANOR, HOLIDAY PARK, AND SHORT STREET ALTERNATIVES

DEP guidelines for the preparation of Act 537 plans specify that an analysis of funding methods available to finance the proposed alternatives must be undertaken for those facilities needed within five years from the date of plan approval. Public sewer facilities serving the Short Street Study Area are the only facilities required in West Hanover Township within the next five years. Facilities serving the Houck Manor and Holiday Park Study Areas are required within ten years from the date of approval of this Act 537 Plan.

Initial design and construction costs represent the most significant investment the Township will be required to make in providing public sewer to the Houck Manor, Holiday Park, and Short Street Study Areas. Nevertheless, the annual operation and maintenance costs of the facilities that will be constructed must also be considered when evaluating the economic feasibility of the proposed systems. Administrative costs and maintenance costs are all incurred and must be considered in the formulation of an annual operating budget for the new facilities. Nevertheless, the largest portion of the annual operating budget will be consumed by debt service.

The revenue needed to plan and construct a public sewerage project can be separated into two (2) general categories. The first category, referred to as up-front revenues, is the total revenue that can be reasonably collected in the initial stages of the project. Up-front revenues typically consist of reserved local funds, government grants, developer contributions and capital charges fees. Up-front revenues are used to offset the costs of planning and constructing the project. In most cases, these revenues are insufficient to cover the total costs of the project and additional revenue is needed. The second category of revenue is financing, which consists of the additional revenue needed to pay for the remainder of the project. Several options are available for financing, including government grants or loans, private loans, or bond issues.

6.5.1 Sources of Up-Front Revenue

It is important for West Hanover Township to obtain as much up-front revenue as reasonably possible to construct the structural alternatives serving the Houck Manor, Holiday Park, and Short Street Study Areas in order to reduce the total amount of the project that must be financed. In the past, there were several federal programs that provided grants for these types of projects. Over the years, these programs have been gradually eliminated as the federal government has transferred most of the financial responsibility for these programs to the state and local level. Consequently, competition for these funds is keen and the majority of available grant money is generally funneled to the most economically distressed communities. As a result, most up-front revenue is now generated locally through connection and tapping fees, and contributions by land developers. A summary of the various sources of up-front revenue the Township should consider in the construction of public sewers serving the Houck Manor, Holiday Park, and Short Street Study Areas is provided as follows:

Pennsylvania Infrastructure Investment Authority (PENNVEST) Grant

The PENNVEST program was established by the Pennsylvania State Legislature to address the health risks posed by inadequate water and wastewater facilities within the Commonwealth. The principle mission of the PENNVEST program is to provide financial assistance for projects that protect the public health and promote economic development in Pennsylvania. Since its inception, this program has developed into primarily a low cost revolving loan program. Grants are rare and are only made when PENNVEST has determined that the financial condition of the recipient is so poor that the repayment of a loan is unlikely, and that the project will not be able to proceed without a direct grant. The recent Growing Greener Initiative has allowed PENNVEST to allocate greater amounts of loans and grants for infrastructure development projects making them more affordable for the users who ultimately must pay for them.

Recent initiatives by the current administration have indicated a priority of funding toward infrastructure projects tied to economic development. As such, the future of funding for projects not involving economic development is uncertain.

Developer Contributions

Contributions by land developers are becoming a relatively common source for up-front revenue. The funds provided by the developer are directly related to the benefits that the development will derive from the use of the public facilities. In some cases, the developer may actually construct the necessary improvements at his expense and then transfer ownership of the improvements to the local municipality. In other cases, in lieu of actually constructing the improvements, the developer may make a cash payment to the municipality to offset a

portion of the costs for the improvements. It is not anticipated that this source of up-front revenue will be available for wastewater management projects serving the Houck Manor, Holiday Park, and Short Street Study Areas.

Capital Charges Fees

Capital charges fees are an equitable means by which a system can assess a portion of the capital costs of constructing the new facilities to all users of the proposed system. The imposition of these fees is based upon the concept that all users of the system derive a benefit from this use, and that the costs of this benefit should be allocated among all users without prejudice or penalty. For this reason, tapping fees are usually based on a measure of the total flow contributed by the service connection or lateral.

PA Act 57 of 2003 contains extensive provisions regarding calculation and types of fees that may be charged by municipalities and authorities. Each community must establish its own fee criteria in accordance with this Act. Capital charges fees are an established method for raising up-front revenue and would be an appropriate part of the Township's financing plan for the proposed projects.

One point to keep in mind when establishing connection and tapping fees is that such fees have the greatest financial impact on residents of existing homes in areas such as Houck Manor, Holiday Park, and Short Street. Unlike new residential development construction where the connection and tapping fee costs are included in total construction costs and financed accordingly, existing residents in the Houck Manor, Holiday Park, and Short Street areas must pay these fees from their own resources or by securing a loan from a local bank. In addition to these fees, the residents must also pay the costs to extend a sewer lateral from the lateral stub provided by the Authority to the point of interconnection with the building sewer. These costs may present a financial hardship for some residents and WHTWSA should consider a program that addresses this situation by providing alternate payment schedules and funding assistance to those residents exhibiting the greatest need.

6.5.2 Sources of Financing

After all sources of up-front revenue have been identified, a reasonable forecast of the anticipated total revenue can then be made. Once the total amount of this up-front revenue is known, the amount of the project that must be financed can then be determined. There are several alternatives for financing a public sewer project. Not all of these alternatives are equally suitable for application to the project. The choice of a financing method varies from project to project, and is dependent upon the financial specifics of each situation and the amount to be borrowed. A summary of the various means of financing for the Houck Manor, Holiday Park, and Short Street structural alternatives follows:

Pennsylvania Infrastructure Investment Authority (PENNVEST) Loan Program

The PENNVEST program offers below market interest financing for financing sewer projects in the Commonwealth of Pennsylvania. The PENNVEST Authority may receive funds from the following sources:

1. State funds appropriated to the Municipality.
2. Federal funds appropriated to or granted to the State or Municipality.
3. Proceeds from the sale of bonds.

PENNVEST is also required to establish a Water Pollution Control Revolving Fund, which is administered in accordance with the requirements of the Water Quality Act of 1987. PENNVEST's Board may also establish non-revolving funds and accounts. The monies deposited with PENNVEST as repayment of the principal and interest due on loans issued from the program are used to pay PENNVEST's indebtedness. The criteria considered by the PENNVEST Board when evaluating applications is summarized as follows:

1. The project's ability to improve the health, safety, welfare, or economic well being of the citizens of the Commonwealth.
2. The project's ability to lead to an effective or complete solution to the problems of the system and bring it into compliance with state and federal regulations.
3. The cost-effectiveness of the proposed project when compared with other alternatives.
4. The consistency of the project with state and regional resource management and economic development plans.
5. Demonstration of the applicant's ability to operate and maintain the project in the proper manner.
6. The ability to promote consolidation of water and wastewater systems where consolidation would provide more effective service of the customers.
7. The availability of other sources of funds at reasonable rates to finance all or portions of the project.

Interest rates for PENNVEST loans typically range from 1 to 6 percent based on community need as judged by the PENNVEST Board. This loan may cover the entire project costs or only a portion of the total costs at the discretion of PENNVEST, and based on community need. Applications are received and funding granted four times per year.

PENNVEST financing offers several advantages in addition to below-market interest rates and possible grants. For example, PENNVEST funding is available to pay for engineering and planning costs prior to the completion of the final design under their advance loan procedure. Construction inspection costs are also eligible under the PENNVEST program. Participation in this program does, however, impose additional responsibilities upon the municipality. Good accounting and administrative procedures must be followed and the use of funds from this program is subject to audit at any time by the State Comptroller's office. Additionally, PENNVEST relies on PA DEP to evaluate the cost effectiveness of the proposed project and verify that PENNVEST funds are being utilized in the appropriate manner. PA DEP will conduct occasional site visits on PENNVEST's behalf and they also provide input to PENNVEST on whether or not to approve payment for changes made during construction.

In order for PENNVEST to maximize the use of its funds, public sewerage projects must meet federal requirements as well as state requirements since PENNVEST receives funds from the federal government to capitalize the Water Pollution Control Revolving Loan Fund. In addition to an approved Act 537 Plan, the following additional planning assessments and investigations must be completed (see Section 6.2):

1. Assessment of innovative and alternative technologies.
2. Investigation of open space and recreational opportunities in conjunction with the public sewer project.
3. Alternative evaluation that provides thorough justification for the selected alternative.
4. Environmental assessment to assure that the project complies with the Water Quality Act and will undergo a review in accordance with the National Environmental Policy Act (NEPA).
5. Public participation.

Other special requirements of the PENNVEST program include the following:

1. A value engineering review of all projects having an estimated treatment works construction cost exceeding \$5 million to verify that the proposed work is cost-effective.

2. The applicant must have an adequate user charge system, sewer use ordinance, and financial capability. The applicant must demonstrate sufficient legal, institutional, managerial, and financial capability to construct, operate, and maintain the proposed project.
3. The applicant must comply with the federal Davis-Bacon Act regarding labor wage rates.
4. The applicant must comply with MBE/WBE/DBE affirmative action steps.
5. One year after the completion of construction and the initiation of operation, the applicant must certify that the treatment facility meets all design specifications and effluent limitations stipulated in its operation permit.

To initiate a request for PENNVEST financial assistance, an application form must be completed. The information provided in this application would be the basis by which PENNVEST makes its decision on whether the project is eligible for funding.

The decision to seek PENNVEST funding must be analyzed on an individual basis depending on the terms and interest rate of the loan. If a decision is made to seek PENNVEST funding, the Authority must be prepared to comply with the regulatory requirements that are inherent to the program.

Municipal Bond Issue

There are several types of bonds; some are taxable and some are tax-exempt. The general classification of municipal bonds usually refers to tax-exempt bonds. There are three types of municipal bonds generally used to finance public works projects:

1. *General Obligation Bonds* are tax-free bonds that are secured by the pledge of the full faith, credit, and taxing power of the issuing municipality. This means that this type of bond is backed by all of the taxes on real estate and personal property within the jurisdiction of the issuing municipality. It involves minimum risk to the investor and, therefore, can be issued at a lower rate of interest than other types of bonds.
2. *Dedicated Tax Bonds* are payable only from the proceeds from a special tax and they are not guaranteed by the full faith, credit, and taxing power of the issuing agency. An example of a special dedicated tax is the special assessment against property, which is adjacent to, and the principal beneficiary of the improvement. The gasoline tax used to finance highway construction is another example.
3. *Revenue Bonds* are payable from revenues derived from the use of the improvement such as tolls, sewer bills, or rent paid by users of the improvement and do not otherwise represent an obligation of the issuing municipality. Revenue Bonds are not ordinarily subject to statutory or constitutional debt limitations. They are often issued by commissions, authorities, and other public agencies created for the specific purpose of financing, constructing, and operating essential public projects.

Typically, municipal bonds are sold to an investment-banking firm, which then resells the bonds to individual investors. The advantage of municipal bonds to the investor is their tax-free status. A bond discount (a percentage of the total bond issue) serves as the investment banker's commission. Before bonds are sold, they must be rated on the basis of the risk to the investor by a rating agency such as Standard and Poor's or Moody's. The higher the rating, the lower the risk to the investor and, consequently, the lower the interest rate that must be paid on the bond. The legal instrument that sets forth the rules that must be observed by the issuing agency is the Trust Indenture. The Trust Indenture is prepared by the Bond Counsel and must be printed along with the bonds. Due to specific requirements as to the denominations of the bonds and the methods and materials used to print the bonds and Trust Indenture, the printing costs can be substantial. A Trustee is required to

administer the bond issue and ensure the terms of the Trust Indenture are observed. For these services, the Authority will incur an annual Trustee fee.

Interest rates on bond issues vary depending upon market trends, the rating of the issuing agency, and other factors. The longer the repayment period is extended the lower the annual debt service and the higher the total amount of interest that must be paid.

A municipal bond issue offers the advantage of long-term fixed rate financing and the opportunity for local investment. The financing arrangement and approval period is shorter than what it is with the PENNVEST program and the Authority would retain more flexibility for future borrowing. The disadvantage of a municipal bond issue is that the interest rates are often higher than the PENNVEST interest rates. Since there are no grants involved, the cost of the bond issue is 100 percent locally funded. The additional costs incurred to prepare the Trust Indenture, pay the Trustee Fees, fund the cover percentage, and to establish a Debt Service Reserve Fund must also be considered. The financial services costs associated with the issuance of a municipal bond issue are also much higher than the costs for PENNVEST funding.

Bank Loan

Because of favorable interest rates, bank loans can be a viable source for funding small to medium sized public works projects. As a general rule, they are not available for projects \$10 million or greater, and the attractiveness of the terms of the loan may vary depending upon the bank and the amount of money to be borrowed. The interest rate available from banks varies depending upon market conditions; however, the rate available to municipalities will generally be at a discount due to the tax advantages received by the bank. Terms and conditions of bank loans vary in a manner similar to personal loans and home mortgages.

The principle advantage of a bank loan is that it can usually be obtained at a favorable interest rate without the cumbersome requirements of a bond issue. The financial service costs associated with obtaining the loan are also much less than for a similar bond issue. Since these financial service costs are generally included in the total project costs, the impact of these charges on the overall project costs can be minimized. Another advantage of the bank loan is that it does not have restrictive coverage requirements, trustee fees, and Trust Indenture preparation charges, as does a bond issue.

6.5.3 Funding Considerations

Funding scenarios for the structural alternatives identified in this Act 537 plan were evaluated in Chapter 5. Tables 5-10 and 5-11 present PENNVEST and tax exempt financing funding scenarios and the resulting user rates for WHTWSA users. These scenarios assume the payment of tapping fees as established by WHTWSA from each new connection as a source of revenue thus reducing the amount of loan or bond required to fund project construction. Based on the evaluation of the structural alternatives presented in Chapter 5, PENNVEST funding is the most cost effective source of financing if required and available. If the Township is unable to obtain PENNVEST funding to finance the construction of the Houck Manor, Holiday Park, and Short Street structural alternatives, tax exempt financing should be pursued.

The funding options available to West Hanover Township to finance the construction of public sewer systems serving the Houck Manor, Holiday Park, and Short Street Study Areas have been briefly examined in this chapter; however, the preparation of detailed funding scenarios, analyses of financial service charges, cash flow analyses based on anticipated revenues, a user service charge system, administrative costs, and personnel costs would require additional information beyond the scope of this Plan. This process requires the involvement of the Township, their solicitor and financial advisor(s) to determine the most viable method of financing the project as well as guaranteeing a continuous source of revenue to satisfy the financial obligations incurred as a result of the project.

An important point to consider when evaluating the amount of anticipated sewer rental revenue is that this money must, in addition to paying the debt service on the construction funds, pay for the annual operating expenses incurred by the new facilities. In addition to paying these costs, it is also desirable to maintain a contingency fund to provide a financial cushion, which may be applied, to a number of items within the annual operating budget.

To assist in this process, it will be necessary for WHTWSA to determine the maximum annual sewer rental rate that would be financially acceptable to the general populace of the Township. A key factor in this consideration is the number of users required to support the annual costs of the system. In general, it is desirable to spread these costs over the largest number of users as possible. This minimizes the costs to each user and maximizes the benefit of the system to the entire Township.

6.6 FUNDING ALTERNATIVES FOR INDIVIDUAL ON-LOT SEWAGE DISPOSAL SYSTEMS

It is the recommendation of this Act 537 Plan that existing areas of the Township currently served by on-lot systems continue to rely on those systems for wastewater treatment with the exception of the Short Street, Holiday Park, and Houck Manor areas. The Short Street Area will be included in the Township's 5-year wastewater planning period, while the Houck Manor and Holiday Park Areas will be included in the 10-year wastewater planning period, as detailed in Chapter 8. Malfunctioning on-lot systems should be repaired or replaced where required by the Township.

The Pennsylvania Infrastructure Investment Authority (PENNVEST) has teamed with the Pennsylvania Housing Finance Agency (PHFA) and the DEP to develop a special funding program to provide low cost financing for the improvement, repair or replacement of individual on-lot sewage disposal systems. This program is available to all citizens of the Commonwealth who meet the eligibility requirements. General requirements are presented below, but applicants will need to determine their eligibility on a case-by-case basis.

- Family Income - must not exceed 150 percent of the statewide median household income, adjusted annually for inflation.
- Credit Worthiness – financial ability to repay the loan.
- Loan Amount – maximum of \$25,000.
- Project Type – rehabilitation, improvement, repair or replacement of an existing system located on a single family, owner occupied property which is the primary residence of the owner.
- Project Location – all areas eligible unless a community wastewater collection and treatment system is either in place or will be constructed in the next five years.
- Project Costs – construction fees and costs, permit fees, loan origination fees and legal fees.
- Documentation – all applicable permits, verification from your local municipality that a community wastewater disposal system neither exists nor is planned in the next five years, income and other credit information.
- Timing – construction may not begin until after approval of the loan.

6.7 PHASED IMPLEMENTATION

The wastewater planning needs identified in Chapter 4 do not require immediate action. No critical public health hazards have been identified that would require activities more immediate than the implementation schedule identified in Chapter 8. Phased implementation is not necessary in this situation.

6.8 ADMINISTRATIVE ORGANIZATION AND LEGAL AUTHORITY FOR IMPLEMENTATION

The implementation of the structural alternatives identified in this Act 537 Plan will require an administrative organization that has the legal authority to incur indebtedness on behalf of the project, can guide the project to completion, and provide the necessary operation and maintenance to the project. The West Hanover Township Water and Sewer Authority is recommended as the agency to implement the proposed structural alternatives. An institutional evaluation of the Authority is provided in Chapter 7.