



August 12, 2020

Conewago Township
541 Oxford Avenue
Hanover, PA 17331

RE: Public Hearing to consider Ordinance No. 2020-C

Comments of Ted Evgeniadis
Lower Susquehanna Riverkeeper
Executive Director – Lower Susquehanna Riverkeeper Association (LSRA)

Wealthy landowners, aggressive developers and sympathetic politicians lead the charge to build out the township of Conewago and surrounding communities into a suburban sprawl. In addition, a new proposed highway remains to be the crux of this endeavor which will allow for further expansion in a town that is already at capacity. Some of this land was purchased under the premise that it would continue to be deemed agricultural. However, the forces driving new development have pressured subsequent zoning boards to change land designations from agricultural to residential. These entities will prosper as they build out unnecessary residential sprawls. These are the same entities who are hoping to use the proposed Eisenhower Drive Extension Highway Project to further their expansive efforts in changing an agriculturally based community into a modernized town center.

Water quality concerns remain to be an issue for the Lower Susquehanna Riverkeeper considering future land use. Designated uses and water quality criteria are the primary tools states use to achieve the objectives and goals of the Clean Water Act, and antidegradation requirements complement these tools by providing a framework for maintaining existing uses, for protecting waters that are of a higher quality than necessary to support the Clean Water Act goals, and for protecting waters identified by states as Outstanding National Resource Waters.

Plum Creek and the South Branch Conewago Creek are listed as impaired for not attaining certain designated uses including aquatic life and recreational uses. These impairments are heavily attributed to urban runoff and pathogens. Added development will only exacerbate these local water quality issues through increased urban runoff. Urban runoff is surface runoff of rainwater created by urbanization. This runoff is a major source of flooding and water pollution in urban communities worldwide. Impervious surfaces (roads, parking lots and sidewalks) are constructed during land development. During rainstorms and other precipitation events, these surfaces (built from materials such as asphalt and concrete), along with rooftops, carry polluted stormwater to storm drains, instead of allowing the water to percolate through soil. This causes lowering of the water table (because groundwater recharge is lessened) and flooding since the amount of water that remains on the surface is greater. Most municipal storm sewer systems discharge polluted stormwater, untreated, to our streams, rivers and eventually the Chesapeake Bay.

Pollution from urban and suburban stormwater runoff has been increasing – up 5 percent for nitrogen between 2009 and 2019, up 3 percent for phosphorus and sediment over this time period, according to numbers from the EPA-led Chesapeake Bay Program. In 2019, stormwater from developed land contributed 40 million pounds of nitrogen to the Bay (16 percent of the total nitrogen pollution), 2.6 million pounds of phosphorus (17 percent of total), and 1.7 billion pounds of sediment (9 percent of total).

One reason for the increase in urban and suburban runoff pollution is continued real-estate development and suburban sprawl – and the failure of states to control this growth in impervious surfaces. Since 2009, the amount of developed land in the Bay watershed has increased by about 300,000 acres, or about 6 percent – an area six times the size of the District of Columbia -- adding more blacktop, roofs, and roads that accelerate runoff pollution. But the other reason is the increase in rainfall from climate change. The Chesapeake Bay Program projects that climate change will increase annual nitrogen pollution in the Bay by 9 million pounds between 2018 and 2025 and increase annual phosphorus loads by 489,000 pounds.

Every year, development and suburban sprawl spreads over an additional roughly 32,000 acres across the Chesapeake Bay watershed. This means that every year an area of land about three quarters the size of Washington, D.C. is converted to parking lots, roofs, roads, lawns, and buildings from fields and forests. That means less rain is being absorbed by natural land cover and filtered by trees, and more is being funneled into Bay tributaries like Plum Creek, South Branch Conewago Creek, and the Lower Susquehanna River.

These trends make the goals of the Chesapeake Bay cleanup (the TMDL) more difficult to attain. The Bay region states will have to adjust their targets and ramp up their levels of effort. This may be especially true for the stormwater sector, which is uniquely vulnerable to changes in precipitation intensity. Everyone knows that climate change is already causing increased pollution loads, and everyone knows that the problem is going to get worse.

In reference to Tim Cormany's report, he states: Limestone geology (otherwise known as karst or carbonate geology) is noted as a restrictive factor to Township development in the 2012 Adams County Greenways Plan. The area under consideration is underlain by the Conestoga formation and is, therefore, subject to a high-water table, sinkhole development, and a greater potential for groundwater contamination. The Plan also includes maps which identify the area as part of the Standardbred Horse Farms agricultural landscape area. This same area is also identified as a significant green space. Both designations qualify the area as a recognized County scenic resource. Given these facts and the presence of karst geology, it would be prudent for the township to refrain from any large development. In addition, Tim's review also indicates that, based on United States Department of Agriculture soils data, 91 % of the subject parcels' soils are classified as prime farmland soils. These soils include the Clarksburg and Conestoga classifications. Given the extremely high value of this soil it would be foolish to allow these lands to be developed. Our future is uncertain and having access to prime agricultural land for following generations is a wise, responsible course of action.

To allow more residential development in a township that is already at 2035 capacity, is not a wise decision for the longevity of this community. Conewago Township schools are becoming overcrowded and more development will make it burdensome for these schools to provide the adequate tutelage for its students. Many citizens have cherished the natural beauty of Adams County, particularly Conewago Township. Residents have become more and more concerned about the unchecked development and road to nowhere that will further destroy wildlife habitats, water quality, aquatic life, and vistas in the county and townships. Conewago Township should be more concerned over preserving land and water quality rather than issuing zoning ordinances (which were zoned agricultural for a reason) for a select few who will prosper by unnecessary residential development.

I urge the board of supervisors to enact Ordinance No. 2020 – C to maintain farming and agricultural lands for the benefit of local water quality, residents and the farmers of Conewago Township and its surrounding communities.

Sincerely,



Ted Evgeniadis – Lower Susquehanna Riverkeeper
Executive Director – LSRA

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