

**STORM SEWER POLLUTION CONTROL FEE AND CREDIT PROGRAM**

*Town Council*

*November 22, 2021*



# Storm Sewer Pollution Control Fee and Credit Program

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In 2019 Herbert, Rowland & Grubic guided Town Council, an Advisory Committee, staff and the community through a detailed planning and analysis process to change from the current \$5 per month Storm Sewer Pollution Control Fee, which is based on customer sanitary sewer connections, to a fee schedule based on lot impervious coverage along with a credit program to create incentives for Storm Sewer Utility customers to implement BMPs to address stormwater on their property.

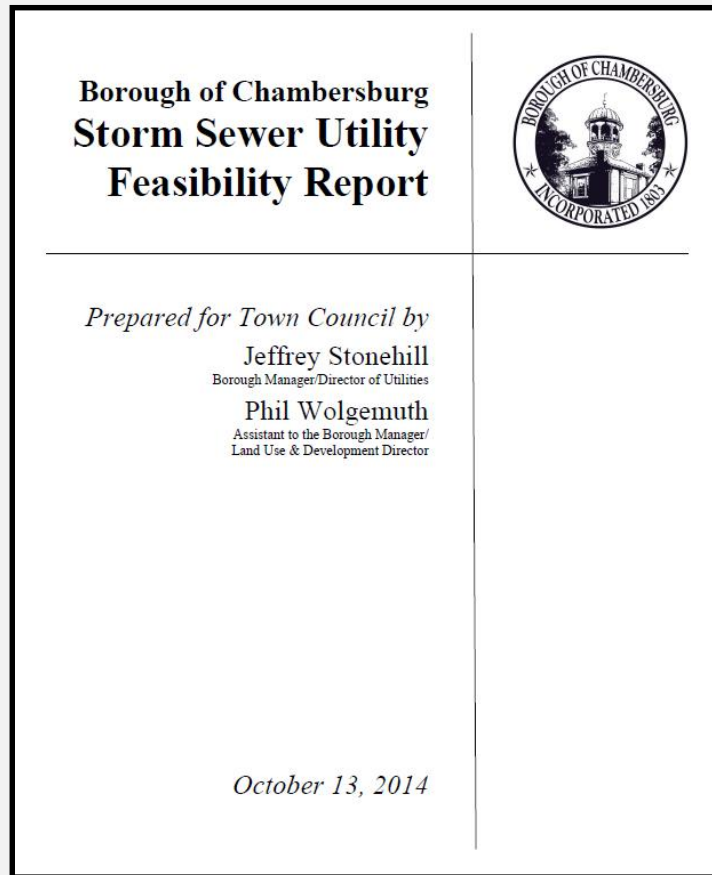
In response to uncertain economic conditions caused by the COVID-19 health crisis, in 2020 Town Council decided to not implement the new fee and credit program in 2021 but rather increase the monthly per sanitary sewer connection fee from \$4 to \$5.

## Challenges and opportunities identified through analysis in 2019:

- Assess and clean pipe system 2020-2022.
- System needs maintenance/repairs totaling \$100,000 in 2020 with increase to \$250,000 in 2021-2023.
- System needs capital improvements, along with Chesapeake Bay Pollutant Reduction Plan BMP projects, totaling \$8.6M by 2023.
- Continue to seek grant funding sources for system improvements.
- Monitor and plan for changes and associated expenditures to be required through next MS4 Permit effective in 2024.
- Like other Borough utilities, funding for system operation and maintenance will be constant forever, regardless of future MS4 Permit requirements.
- As much as possible, implement incremental increases to program and fees.

YEAR	ANNUAL REVENUE NEED
2020	\$1.0M
2021	\$1.2M
2022	\$1.6M
2023	\$1.8M

# Storm Sewer Pollution Control Fee and Credit Program



In 2014 a Storm Sewer Utility Feasibility Report was provided to Town Council that recommended starting the utility with a Storm Sewer Pollution Control fee based on customer sanitary sewer connections but then to change to a fee based on impervious coverage for each lot with a credit system to offset fees.

In 2018 the Borough hired Access Geographic take aerial photography that included data indicating that there is 66,427,080 square feet of lot impervious coverage in the Borough, which is 36% of the 4,211 acres, or 183,431,160 square feet, of land in the Borough.

That data was used to establish an Equivalent Residential Unit (ERU), which is the average impervious area (IA), of all single-family residential properties in the Borough. One ERU equals 2,920 square feet.

Comparing that data with the Storm Sewer Pollution Control fees charged since 2015 highlights the disproportionate impacts on customers by charging fees based on sanitary sewer connections versus fees based on impervious coverage.

LAND USE	SQUARE FEET	PERCENTAGE TOTAL
Single-family	19,272,000	30%
Non-single-family	47,155,080	70%
Total	66,427,080	

# Storm Sewer Pollution Control Fee and Credit Program

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If the Storm Sewer Pollution Control Fee is changed to be based on impervious coverage, it is estimated that there will be 6,600 single-family residential and 993 non-single-family residential customers paying for 22,749 ERUs encompassing 66,427,080 square feet of impervious area. Of the 22,749 ERUs, 6,600 will be for single-family residential customers and 16,149 will be for non-single-family residential customers. By using those numbers, the hypothetical examples on slides 4 and 5 clearly indicate that changing to a fee based on impervious coverage would be more fair and equitable, especially for single-family residential customers, who have the least amount of impervious area on their lots but are currently paying 87% of the total annual revenue collected by the Storm Sewer Utility. They would pay only 30% if the fee is changed to be based impervious coverage.



# Storm Sewer Pollution Control Fee and Credit Program

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FEE BASED ON SANITARY SEWER CONNECTIONS				
Fee	Years Charged	Single-family	Non-single-family	Total Annual Revenue
\$3 per month	2015-2016	\$237,600	\$35,748	\$273,348
\$4 per month	2017-2020	\$316,800	\$47,664	\$364,464
\$5 per month	2021	\$396,000	\$59,580	\$455,580

CUSTOMERS	IMPERVIOUS AREA	IMPERVIOUS AREA PERCENTAGE	REVENUE PERCENTAGE
Single-family	19,272,000 sf	30%	87%
Non-single-family	47,155,080 sf	70%	13%

# Storm Sewer Pollution Control Fee and Credit Program

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FEE BASED ON IMPERVIOUS COVERAGE				
Fee	Years Charged	Single-family	Non-single-family	Total Annual Revenue
\$3 per month	2015-2016	\$237,600	\$581,364	\$818,964
\$4 per month	2017-2020	\$316,800	\$775,152	\$1,091,952
\$5 per month	2021	\$396,000	\$968,940	\$1,364,940

CUSTOMERS	IMPERVIOUS AREA	IMPERVIOUS AREA PERCENTAGE	REVENUE PERCENTAGE
Single-family	19,272,000 sf	30%	30%
Non-single-family	47,155,080 sf	70%	70%

# Storm Sewer Pollution Control Fee and Credit Program

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## RECOMMENDED RATES FOR 2022

Once the Storm Sewer Pollution Control Fee is changed to be based on impervious coverage, Town Council can set the monthly ERU rate:

- \$5 per month per ERU (recommended) – No rate change for 87% of customers (single-family) but changes for the 13% balance (non-single-family) with some big fee increases.
- \$3 per month per ERU (less revenue) – Significant rate reduction for 87% of customers (single-family) and still some increases for 13% balance (non-single-family). Back to rate charged in 2015-2016.
- \$1.50 per month per ERU (very little revenue) – Massive rate reduction for 87% of customers (single-family) and still some increases for 13% balance (non-single-family).

As the examples in this presentation demonstrate, making the 13% (non-single-family) pay their **fair share** can be reduced but there is no way to prevent an increase in the amount they pay. Unless Town Council abandons their desire for the 87% (single-family) to stop subsidizing the 13% (non-single-family) of property owners with commercial, industrial and institutional properties.

In the last few years, commercial, industrial, and institutional property owners received substantial discounts while homeowners paid full shares. This practice went unnoticed by the public, was done to smooth the new Storm Sewer Pollution Control Fee and Credit Program implementation over the last few years, and was scheduled to end in 2021.

# Storm Sewer Pollution Control Fee and Credit Program

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## RECOMMENDED RATES FOR 2022

As part of the 2022 budget planning process, on July 12, 2021, staff recommended retaining the \$5 per month Storm Sewer Pollution Control Fee but changing to an ERU fee with single-family residential customers charged one ERU (\$5 per month) and all other customers (non-single-family) charged ERUs based on the amount of IA (monthly fee dependent on the amount of IA on their property).

ERUs would be calculated as whole or half numbers only, with fraction of whole number less than 0.25 rounded down to whole number, fraction of whole number 0.25 and greater rounded up to half number, fraction of whole number less than 0.75 rounded down to half number and fraction of whole number 0.75 and greater rounded up to next whole number.

To provide options for Town Council, staff still recommends changing the fee to be based on impervious coverage but offers several alternatives for the monthly ERU rate to be charged. The table below indicates estimated annual revenue collections for those alternatives.

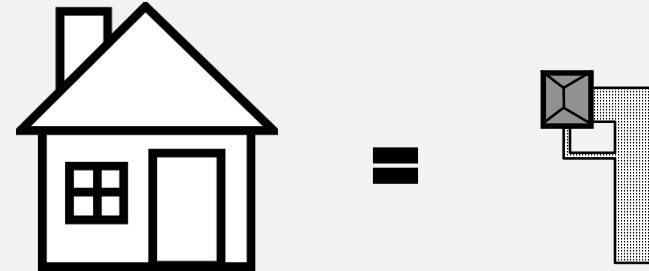
ESTIMATED CUSTOMERS		\$5 PER MONTH	\$3 PER MONTH	\$1.50 PER MONTH
Single-family	6,600	\$396,000	\$237,600	\$118,800
Non-single-family	993	\$968,940	\$581,364	\$290,682
Total	7,593	\$1,364,940	\$818,964	\$409,482



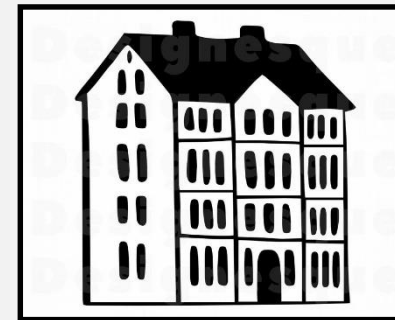
# Storm Sewer Pollution Control Fee and Credit Program

## RESIDENTIAL CLASSIFICATIONS

1. Single-Family Attached Dwelling (ERU)
2. Single-Family Detached Dwelling (ERU)
3. Single-Family Semidetached Dwelling (ERU)
4. Two-Family Dwelling (IA)
5. Multifamily Dwelling (IA)
6. Garden Apartment (IA)
7. Multiple Residential Buildings One Lot (IA)
8. Residential/Commercial Mixed-Use (IA)



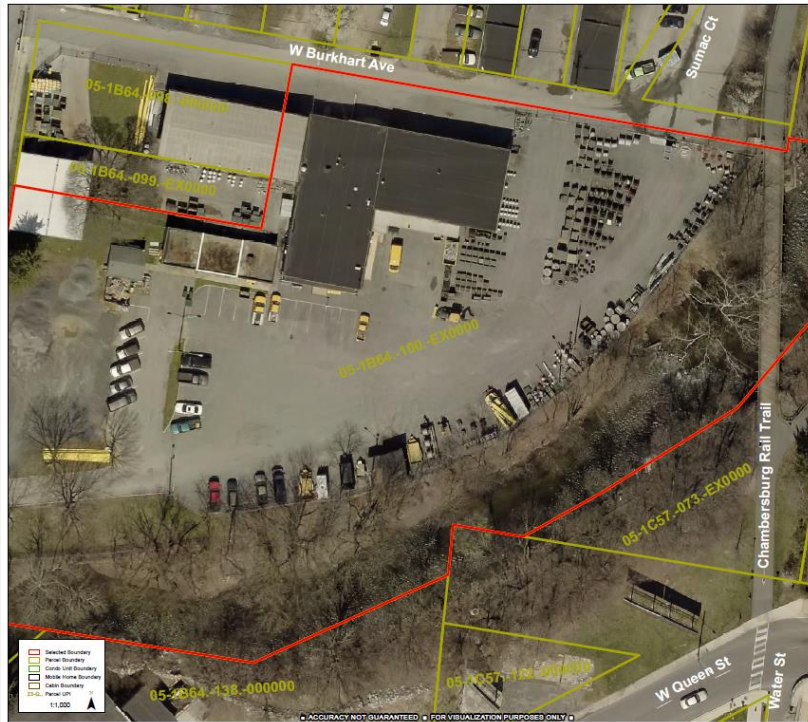
1 ERU = 2,920 square feet IA  
Monthly Fee = \$5/\$3/\$1.50  
Annual Fee = \$60/\$36/\$18



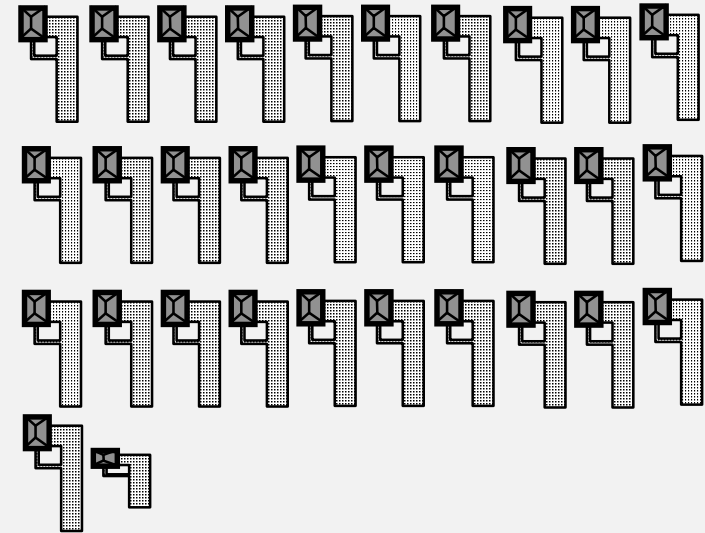
20 ERU = 58,400 square feet IA  
Monthly Fee = \$100/\$60/\$30  
Annual Fee = \$1,200/\$720/\$360

# Storm Sewer Pollution Control Fee and Credit Program

## COMMERCIAL/INDUSTRIAL/INSTITUTIONAL CLASSIFICATIONS



**BOROUGH UTILITIES SERVICE CENTER**  
80 South Franklin Street



<b>Total Area</b>	<b>116,270 sf</b>
<b>Total Impervious Area (Includes new building)</b>	<b>91,868 sf</b>
<b>IA per ERU</b>	<b>2,920 sf</b>
<b>TOTAL ERU</b>	<b>31.5</b>
<b>Proposed Monthly Fee</b>	<b>\$157.50/\$94.50/\$47.25</b>
<b>Proposed Annual Fee</b>	<b>\$1,890/\$1,134/\$567</b>

# Storm Sewer Pollution Control Fee and Credit Program

## CEMETERY CLASSIFICATIONS

Impervious area for all cemeteries 10% or less, thus recommend exempting cemeteries from Storm Water Pollution Control Fee.



Cedar Grove Cemetery  
59,910 square feet IA  
Total ERU = 20  
Exempt



Corpus Christi Cemetery  
7,961 square feet IA  
Total ERU = 2  
Exempt



Lincoln Cemetery  
88,821 square feet IA  
Total ERU = 30  
Exempt



Sons of Israel Cemetery  
580 square feet IA  
Total ERU = 0  
Exempt



Stouffer Cemetery  
367 square feet IA  
Total ERU = 0  
Exempt

# Storm Sewer Pollution Control Fee and Credit Program

## AGRICULTURE/FARM CLASSIFICATIONS

Limited number of properties with impervious area 10% or less, thus recommend charging these properties Storm Water Pollution Control Fee of 1 ERU per month.



**Bender Lincoln Way East**  
Total Area = 656,013 square feet (15.06 acres)  
Total Impervious Area = 50,516 square feet  
Impervious Area Percentage = 7.7%  
Total ERU = 17  
Current Monthly Fee = \$5  
Current Annual Fee = \$60  
Proposed Monthly Fee = \$5/\$3/\$1.50  
Proposed Annual Fee = \$60/\$36/\$18



**Richards Spring Lane**  
Total Area = 473,061 square feet (10.86 acres)  
Total Impervious Area = 33,697 square feet  
Impervious Area Percentage = 7.12%  
Total ERU = 11.5  
Current Monthly Fee = \$5  
Current Annual Fee = \$60  
Proposed Monthly Fee = \$5/\$3/\$1.50  
Proposed Annual Fee = \$60/\$36/\$18



**Rotz Hollywell Avenue**  
Total Area = 4,348,110 square feet (93.9 acres)  
Total Impervious Area = 88,618 square feet  
Impervious Area Percentage = 2.04%  
Total ERU = 30  
Current Monthly Fee = \$5  
Current Annual Fee = \$60  
Proposed Monthly Fee = \$5/\$3/\$1.50  
Proposed Annual Fee = \$60/\$36/\$18

# Storm Sewer Pollution Control Fee and Credit Program

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## CREDIT POLICY

Offer three different credits as means for customers to reduce monthly Storm Sewer Pollution Control Fees by implementing Best Management Practice (BMP) activities to reduce the contribution of stormwater and pollutants to the storm sewer system and/or to aid in meeting MS4 Permit obligations.

- 1. Single-family residential customers that attend Borough sponsored educational programs that comply with MS4 MCM for Public Education.*
- 2. Non-single-family residential customers that install and maintain structural BMPs on their property that comply with the Stormwater Management Code.*
- 3. Any customer that provides an easement for BMPs to be installed on their property to comply with the Borough MS4 Permit or Chesapeake Bay Pollutant Reduction Plan.*

The credit program will be simple and easy to understand with Storm Sewer Utility staff readily available to provide customers with technical assistance and cost benefit analysis for credit applicability for their property.

It is understood that credits will reduce the amount of revenue collected by the Storm Sewer Utility, which may be augmented by future Storm Water Pollution Control Fee increases, but that encourage customers to practice good stormwater management that helps the Borough comply with its MS4 Permit obligations, Stormwater Management Code and/or Chesapeake Bay Pollutant Reduction Plan.

# Storm Sewer Pollution Control Fee and Credit Program

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## PUBLIC EDUCATION CREDIT

The Storm Sewer Utility sponsors one educational program per year to comply with MS4 MCM for Public Education. Programs are typically held at City Hall but may be offered virtually or a combination of in-person and virtually.

Single-family residential customers that attend this event will receive reimbursement for one monthly ERU fee, which is recommended to be \$5 in 2022 but will increase in the future as directed by Town Council.

Reimbursement will be made via check for each customer that attends the event in its entirety and completes a simple attendance form.

Reimbursement will be made for only one ERU fee per customer that attends the event. For example, a family of four for one customer account that attends the event will be reimbursed one ERU fee, not four ERU fees.

Only Borough sponsored educational programs qualify for this credit and will be offered only one time per year with ample notice provided through a utility bill flyer, the Borough website and news release. The same credit will be made available for customers in subsequent years, including customers that previously secured a credit.

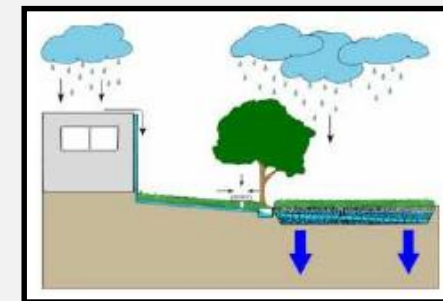
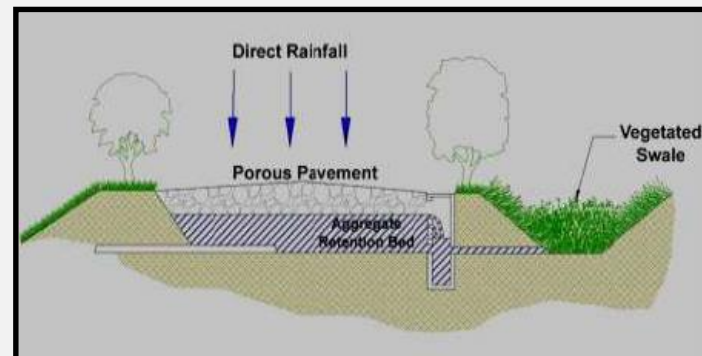
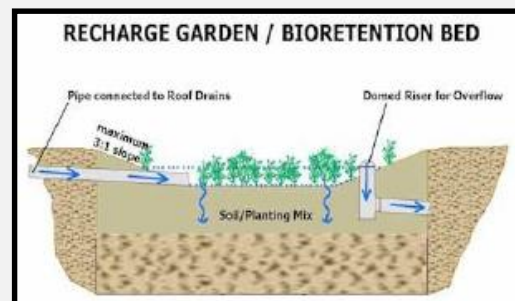
# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT

A structural BMP is a facility or other improvement on a property, whether private or public, that addresses stormwater runoff from impervious areas on the property, thus lessening stormwater runoff impact to the Borough storm sewer system. Property owners typically construct and maintain these BMPs and provide an easement to the Borough for Storm Sewer Utility personnel inspection to ensure the BMP is maintained and functioning properly.

*Storm Water Pollution Control Fee credits will be offered for non-single-family residential customers customers that install and maintain structural BMPs on their property.*

- 30% credit will be offered for structural BMPs that were installed on customer property after June 20, 2004 when Town Council first adopted Stormwater Management Code.*
- 15% credit will be offered for structural BMPs that were installed on customer property before June 20, 2004 when Town Council first adopted Stormwater Management Code.*
- 30% credit will be offered for customer properties where structural BMPs were installed before and after June 20, 2004 when Town Council first adopted Stormwater Management Code.*



# Storm Sewer Pollution Control Fee and Credit Program

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## STRUCTURAL BMP CREDIT CONTINUED

All BMPs qualifying for a credit must be maintained in compliance with the Borough Stormwater Management Code and the Pennsylvania Stormwater Best Management Practices Manual.

Non-single-family residential customers that wish to install BMPs to qualify for credit, or increase their credit from 15% to 30%, must hire a Pennsylvania licensed engineer, surveyor or design professional to prepare a Drainage Plan as defined in the Borough Stormwater Management Code. An escrow account must be established to reimburse the Borough for expenditures incidental to the Drainage Plan review and approval process, including but not limited to fees of the Borough, legal fees and other engineering or consulting fees. Credits will not be issued until a Drainage Plan is approved by the Storm Sewer System Manager and Borough engineering consultant and associated BMPs are constructed entirely at the customers expense and are inspected and approved by the Borough.

Credits will not be issued until a Standard Stormwater Facilities Maintenance and Monitoring Agreement is recorded with the Franklin County Register and Recorder. Agreements must be signed by the property owner and approved by Town Council. A fee will be established for the Borough to record Agreements on behalf of customers.

Credits will be valid through the expiration date of the Borough MS4 Permit, currently March 15, 2023, and may be automatically renewed based upon credit conditions still being met but the magnitude of the credit may be altered based upon changes in Storm Sewer Utility regulatory requirements or operating costs.

Credits will be calculated as whole or half numbers only, with fraction of whole number less than 0.25 rounded down to whole number, fraction of whole number 0.25 and greater rounded up to half number, fraction of whole number less than 0.75 rounded down to half number and fraction of whole number 0.75 and greater rounded up to next whole number.

A simple Structural BMP Credit application will be required but there will be no application fee.



# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE RESIDENTIAL (APARTMENT BUILDINGS PROGRESS ROAD)

Approved by Town Council through Borough Plan RE-1281 and RE-1557 for four 12-unit apartment buildings and associated off-street parking and access areas. At full build-out five bio-retention basins will serve as BMPs addressing stormwater to be installed after Stormwater Management Code first adopted in 2004. Standard Stormwater Facilities Maintenance and Monitoring Agreement recorded for Borough Plan RE-1557 but needs to be recorded for RE-1281, which is located on separate tax parcel.



APARTMENT BUILDINGS  
Progress Road/Benedict Avenue

<b>Current Monthly Fee</b>	<b>\$10</b>
<b>Current Annual Fee</b>	<b>\$120</b>
<b>Total Area</b>	<b>127,211 sf</b>
<b>Total Impervious Area</b>	<b>73,097 sf</b>
<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>25</b>
<b>Proposed Monthly Fee</b>	<b>\$125/\$75/\$37.50</b>
<b>Proposed Annual Fee</b>	<b>\$1,500/\$900/\$450</b>
<b>ERU Minus 30% Credit</b>	<b>17.5</b>
<b>Reduced Monthly Fee</b>	<b>\$87.50/\$52.50/\$26.25</b>
<b>Reduced Annual Fee</b>	<b>\$1,050/\$630/\$315</b>

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE COMMERCIAL (TURKEY HILL)

Pending Town Council approval through Borough Plan RE-1559 for Turkey Hill and associated off-street parking and access areas. A subsurface stone infiltration bed and grass swale will serve as BMPs to be installed after Stormwater Management Code first adopted in 2004. Standard Stormwater Facilities Maintenance and Monitoring Agreement to be recorded after plan approved.



TURKEY HILL  
1090 Wayne Avenue

<b>Current Monthly Fee</b>	<b>\$5</b>
<b>Current Annual Fee</b>	<b>\$60</b>
<b>Total Area</b>	<b>200,292 sf</b>
<b>Total Impervious Area</b>	<b>156,657 sf</b>
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<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>53.5</b>
<b>Proposed Monthly Fee</b>	<b>\$267.50/\$160.50/\$80.25</b>
<b>Proposed Annual Fee</b>	<b>\$3,210/\$1,926/\$963</b>
<b>ERU Minus 30% Credit</b>	<b>37.5</b>
<b>Reduced Monthly Fee</b>	<b>\$187.50/\$112.50/\$56.25</b>
<b>Reduced Annual Fee</b>	<b>\$2,250/\$1,350/\$675</b>

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE INDUSTRIAL (VENTURA FOODS)

Approved by Town Council through Borough Plan RE-708, RE-1363 and RE-1385 for building for manufacturing use and associated off-street parking and access areas. A detention basin, rain gardens and grass swale serve as BMPs to address stormwater were installed after Stormwater Management Code first adopted in 2004. Standard Stormwater Facilities Maintenance and Monitoring Agreement needs to be recorded.



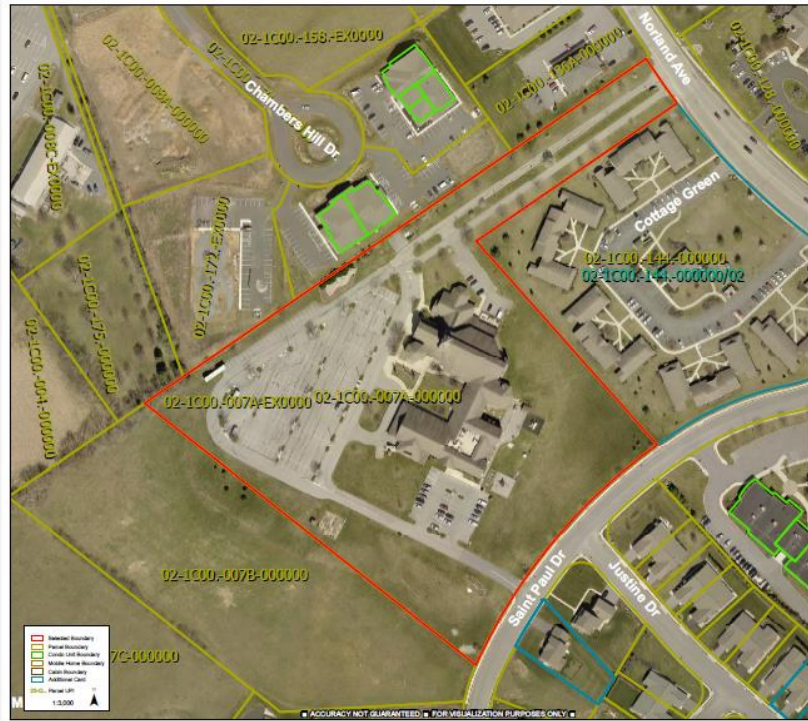
VENTURA FOODS  
1501 Orchard Drive

<b>Current Monthly Fee</b>	<b>\$5</b>
<b>Current Annual Fee</b>	<b>\$60</b>
<b>Total Area</b>	<b>1,625,023 sf</b>
<b>Total Impervious Area</b>	<b>1,051,311 sf</b>
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<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>360</b>
<b>Proposed Monthly Fee</b>	<b>\$1,800/\$1,080/\$540</b>
<b>Proposed Annual Fee</b>	<b>\$21,600/\$12,960/\$6,480</b>
<b>ERU Minus 30% Credit</b>	<b>252</b>
<b>Reduced Monthly Fee</b>	<b>\$1,260/\$756/\$378</b>
<b>Reduced Annual Fee</b>	<b>\$15,120/\$9,072/\$4,536</b>

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE INSTITUTIONAL (ST. PAUL UNITED METHODIST CHURCH)

Approved by Town Council through Borough Plan RE-894 for church building and associated off-street parking and access areas. One detention basin serves as BMP addressing stormwater, however, it was planned and constructed before Stormwater Management Code first adopted in 2004. Customer could hire design professional to determine whether the detention basin complies with Code or if alterations are necessary to become Code compliant, thus increasing their credit from 15% to 30%. Standard Stormwater Facilities Maintenance and Monitoring Agreement needs to be recorded.



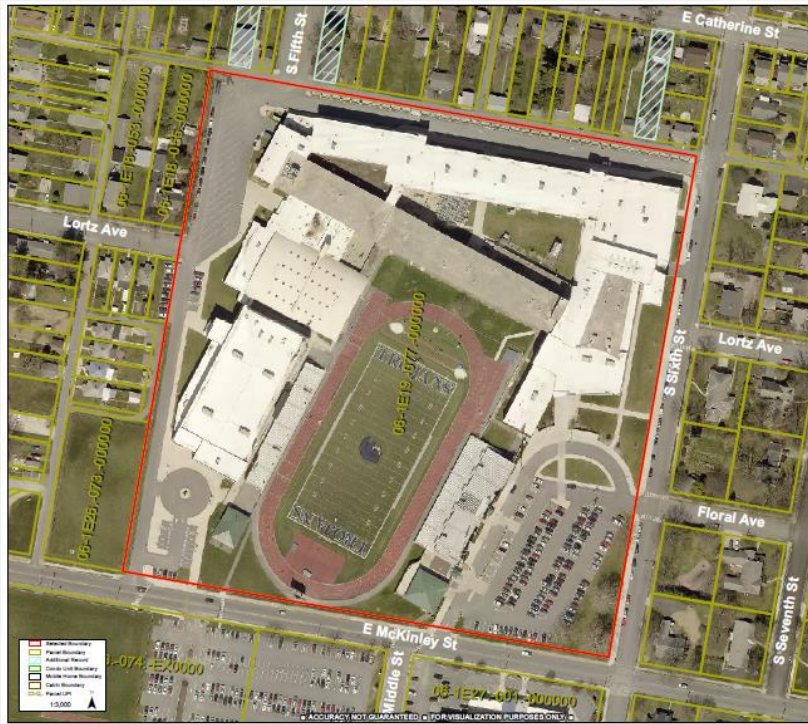
ST. PAUL UNITED METHODIST CHURCH  
750 Norland Avenue

<b>Current Monthly Fee</b>	<b>\$5</b>
<b>Current Annual Fee</b>	<b>\$60</b>
<b>Total Area</b>	<b>435,698 sf</b>
<b>Total Impervious Area</b>	<b>191,863 sf</b>
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<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>65.5</b>
<b>Proposed Monthly Fee</b>	<b>\$327.50/\$196.50/\$98.25</b>
<b>Proposed Annual Fee</b>	<b>\$3,930/\$2,358/\$1,179</b>
<b>ERU Minus 15% Credit</b>	<b>55.5</b>
<b>Reduced Monthly Fee</b>	<b>\$277.50/\$166.50/\$83.25</b>
<b>Reduced Annual Fee</b>	<b>\$3,330/\$1,998/\$83.25</b>
<b>ERU Minus 30% Credit</b>	<b>46</b>
<b>Reduced Monthly Fee</b>	<b>\$230/\$138/\$69</b>
<b>Reduced Annual Fee</b>	<b>\$2,760/\$1,656/\$828</b>

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE INSTITUTIONAL (CASHS)

Approved by Town Council through Borough Plan RE-1260 for high school building expansion and associated off-street parking and access areas. One sub-surface detention basin serves as BMP addressing stormwater. Standard Stormwater Facilities Maintenance and Monitoring Agreement needs to be recorded.



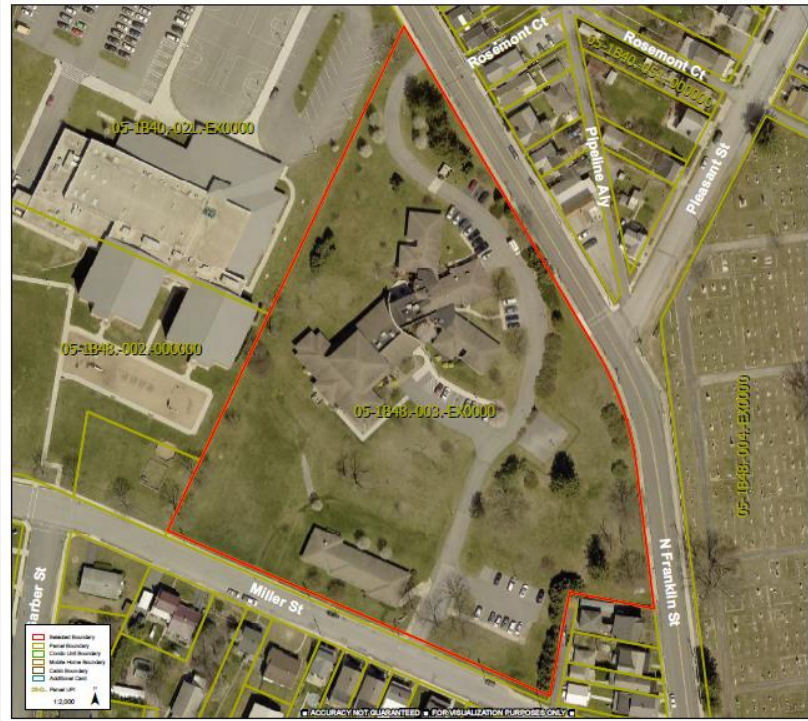
CHAMBERSBURG AREA SENIOR HIGH SCHOOL  
511 South Sixth Street

Current Monthly Fee	\$5
Current Annual Fee	\$60
Total Area	850,236 sf
Total Impervious Area	609,300 sf
IA per ERU	2,920 sf
Total ERU	208.5
Proposed Monthly Fee	\$1,042.50/\$625.50/\$315.75
Proposed Annual Fee	\$12,510/\$7,506/\$3,789
ERU Minus 30% Credit	146
Reduced Monthly Fee	\$730/\$438/\$219
Reduced Annual Fee	\$8,760/\$5,256/\$2,628

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE INSTITUTIONAL (CHILDREN'S AID SOCIETY)

Approved by Town Council through Borough Plan RE-1045 and RE-1516 for two buildings and associated off-street parking and access areas. Two detention basins and a grass swale serve as BMPs addressing stormwater with one detention basin planned and constructed before Stormwater Management Code first adopted in 2004 and one constructed afterwards.



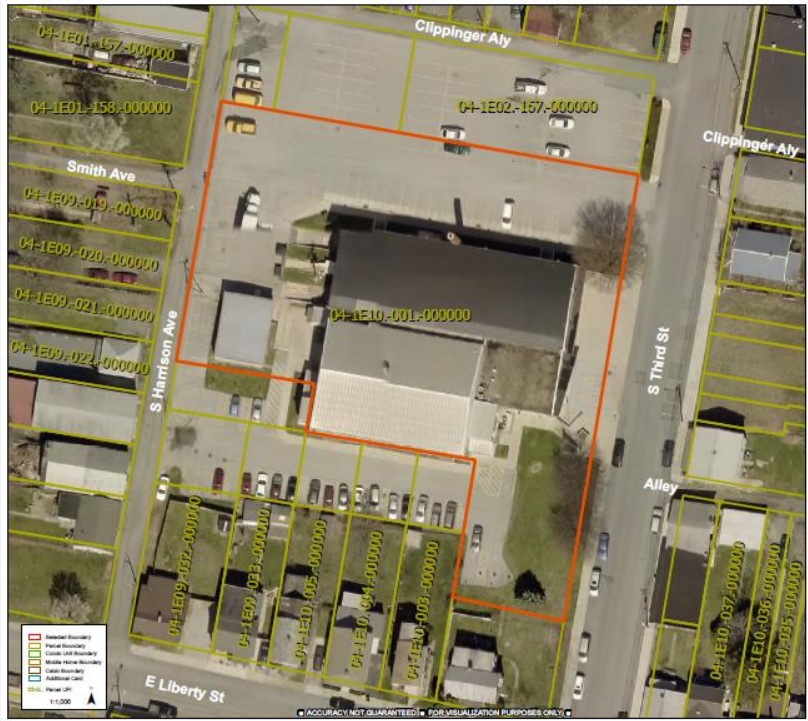
CHILDREN'S AID SOCIETY  
255 Miller Street

Currently Monthly Fee	\$10
Current Annual Fee	\$120
Total Area	258,720 sf
Total Impervious Area	54,735 sf
IA per ERU	2,920 sf
Total ERU	25
Proposed Monthly Fee	\$125/\$75/\$37.50
Proposed Annual Fee	\$1,500/\$900/\$450
ERU Minus 30% Credit	17.5
Reduced Monthly Fee	\$87.50/\$52.50/\$26.25
Reduced Annual Fee	\$1,050/\$630/\$315

# Storm Sewer Pollution Control Fee and Credit Program

## STRUCTURAL BMP CREDIT EXAMPLE INSTITUTIONAL (BOROUGH RECREATION CENTER)

Underground detention tanks serve as BMPs addressing stormwater, however, they were installed before Stormwater Management Code first adopted in 2004. Customer could hire design professional to determine whether the detention basin complies with Code or if alterations are necessary to become Code compliant, thus increasing their credit from 15% to 30%. Standard Stormwater Facilities Maintenance and Monitoring Agreement needs to be recorded.



**BOROUGH RECREATION CENTER**  
235 South Third Street

<b>Current Monthly Fee</b>	<b>\$5</b>
<b>Current Annual Fee</b>	<b>\$60</b>
<b>Total Area</b>	<b>78,276 sf</b>
<b>Total Impervious Area</b>	<b>67,777 sf</b>
<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>23</b>
<b>Proposed Monthly Fee</b>	<b>\$115/\$69/\$34.50</b>
<b>Proposed Annual Fee</b>	<b>\$1,380/\$828/\$414</b>
<b>ERU Minus 15% Credit</b>	<b>19.5</b>
<b>Reduced Monthly Fee</b>	<b>\$97.50/\$58.50/\$28.25</b>
<b>Reduced Annual Fee</b>	<b>\$1,170/\$702/\$339</b>
<b>ERU Minus 30% Credit</b>	<b>16</b>
<b>Reduced Monthly Fee</b>	<b>\$80/\$48/\$24</b>
<b>Reduced Annual Fee</b>	<b>\$960/\$576/\$288</b>

# Storm Sewer Pollution Control Fee and Credit Program

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## EASEMENT CREDIT

A credit will be provided to any customer that grants an easement for the Borough to construct and maintain a stormwater BMP on their property.

This credit is intended for projects that would be financially prohibitive for a property owner to complete on their own but is an important project for meeting the goals of the Borough MS4 Permit or Chesapeake Bay Pollutant Reduction Plan.

Before a credit is granted the Borough and property owner will establish an agreeable value for the easement which will serve as the total amount of credit to be applied. The Storm Water Pollution Control Fee for that customer will be suspended over a period of time until the total credit amount is realized.

An Easement Credit may be issued for customer that already received a Public Education Credit or Structural BMP Credit.

Chesapeake Bay Pollutant Reduction Plan projects that may benefit from an easement credit include, but are not limited to, Elder Street/West Commerce Street, Stevens Elementary, Wilson College, Nitterhouse Park and Sheffler Drive.



# Storm Sewer Pollution Control Fee and Credit Program

It is estimated that there will be 993 non-single-family residential customers paying for 16,149 ERUs encompassing 47,155,080 square feet of impervious area.

NON-SINGLE FAMILY RESIDENTIAL CUSTOMER FEE EXAMPLES					
ERUs	Number of Customers	Customer	Address	Monthly Fee	Annual Fee
351-400	3	Ventura Foods	1501 Orchard Dr.	\$1,800/\$1,080/\$540	\$21,600/\$12,960/\$6,480
		Wilson College	1015 Philadelphia Ave.	\$1,800/\$1,080/\$540	\$21,600/\$12,960/\$6,480
		Chambersburg Crossing Shopping Center	Norland Ave.	\$1,782.50/\$1,069.50/\$534.75	\$21,390/\$12,834/\$6,417
301-350	1	Knouse Foods	421 Grant St.	\$1,715/\$1,029/\$514.50	\$20,580/\$12,348/\$6,174
251-300	1	TB Woods	1002 Wayne Ave.	\$1,490/\$894/\$447	\$17,880/\$10,728/\$5,364
201-250	7	Menno Haven Penn Hall	440 Fifth Ave.	\$1,242.50/\$745.50/\$372.75	\$14,910/\$8,946/\$4,473
		Chambersburg Hospital	112 N. Seventh St.	\$1,235/\$741/\$370.50	\$14,820/\$8,892/\$370.50
151-200	9	Americold Logistics	1480 Nitterhouse Dr.	\$962.50/\$577.50/\$288.75	\$11,550/\$6,930/\$3,465
		Wayne Plaza	Wayne Ave.	\$942.50/\$565.50/\$282.75	\$11,310/\$6,786/\$3,393
101-150	15	Chambersburg Area School District	435 Stanley Ave.	\$730/\$438/\$219	\$8,760/\$5,256/\$2,628
		Samuel D. & Lynn D. Armstrong	305 W. Commerce St.	\$725/\$435/\$217.50	\$8,700/\$5,220/\$2,610
51-100	26	Cabot III	1475 Nitterhouse Dr.	\$480/\$288/\$144	\$5,760/\$3,456/\$1,728
		Lynn D. Armstrong	610 Fifth Ave.	\$467.50/\$280.50/\$140.25	\$5,610/\$3,366/\$1,122
1.5-50	767	King Street Church	162 E. King St.	\$247.50/\$148.50/\$74.25	\$2,970/\$1,782/\$74.25
		Amvets Post 224	750 Fifth Ave.	\$242.50/\$145.50/\$72.75	\$2,910/\$1,746/\$72.75

# Storm Sewer Pollution Control Fee and Credit Program

## IMPERVIOUS AREA REDUCTION POLICY

Non-single-family residential customers can permanently reduce their Storm Water Pollution Control Fee by reducing the amount of impervious area on their property. This can be accomplished by removing buildings or parking lots that are part of the impervious area being used by the Borough to establish their Storm Water Pollution Control Fee. Removed areas must be replaced with vegetative cover to allow stormwater runoff infiltration.

The customer must hire a Pennsylvania licensed engineer, surveyor or design professional to confirm in writing the square footage of impervious area reduction.

A simple Impervious Area Reduction application will be required but there will be no application fee.

<b>Current Monthly Fee</b>	<b>\$5</b>
<b>Current Annual Fee</b>	<b>\$60</b>
<b>Total Area</b>	<b>224,794 sf</b>
<b>Total Impervious Area</b>	<b>185,185 sf</b>
<b>IA per ERU</b>	<b>2,920 sf</b>
<b>Total ERU</b>	<b>65</b>
<b>Proposed Monthly Fee</b>	<b>\$325/\$195/97.50</b>
<b>Proposed Annual Fee</b>	<b>\$3,900/\$2,340/\$1,170</b>
<b>ERU Minus 37,811 sf IA</b>	<b>52</b>
<b>Reduced Monthly Fee</b>	<b>\$260/\$156/\$78</b>
<b>Reduced Annual Fee</b>	<b>\$3,120/\$1,872/\$936</b>



**MOOSE LODGE NO. 842**  
1100 Sheller Avenue

# Storm Sewer Pollution Control Fee and Credit Program

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## APPEAL POLICY

If a customer feels that their Storm Water Pollution Control Fee is incorrect they may appeal it.

It may be necessary for the customer to hire a Pennsylvania licensed engineer, surveyor or design professional to confirm in writing the square footage of impervious area on their property in relation to the area being used by the Borough to establish their Storm Water Pollution Control Fee. It is important to note that review of the impervious area may cause their fee to increase as a result of the appeal.

Appeals will be addressed through the Dispute Provisions contained in Chapter 3 of the Borough Utility Service Manual. The process is described in paragraph 2, Disputing a Bill or the Borough's Implementation of any Provision of the Utility Service Manual.

Customers that believe fees have been assessed for a parcel they do not own should notify the Storm Sewer Utility.

 <p>UTILITY SERVICE MANUAL March 29, 2021</p> <p>ADOPTED BY THE MAYOR AND TOWN COUNCIL OF THE BOROUGH OF CHAMBERSBURG</p>	<p style="text-align: center;"><b>CHAPTER 3</b> <b>DISPUTE PROVISIONS</b></p> <ol style="list-style-type: none"><li>1. <u>DISPUTING PROVISIONS OF THE UTILITY SERVICE MANUAL</u> – In the event a customer desires to challenge the legality of any provision of this Utility Service Manual, the customer must file an action in the Court of Common Pleas of Franklin County, Pennsylvania.</li><li>2. <u>DISPUTING A BILL OR THE BOROUGH'S IMPLEMENTATION OF ANY PROVISION OF THE UTILITY SERVICE MANUAL</u> – If at any time within the seven (7) day period of the date of a delinquent notice, the customer advises the Borough in writing, that he/she disputes liability for any part of the bill as rendered, or disagrees with the manner in which the bill amount was arrived at, a time and date will be fixed for a hearing before the Borough Manager or Assistant Manager, at which time the customer can state his/her claim. A customer who files an informal hearing request must declare under oath or affirmation that the request was not executed for the purpose of delay. The hearing will be within seven (7) days from the date of notifying the Borough Office that the customer disputes the billing. At the hearing, the customer may appear in person, be represented by an attorney-at-law and bring any witnesses he/she may desire to have at the hearing. When the Borough has been informed of a dispute in accordance with the above provisions, the termination of the utility service will not take place until the customer has been</li></ol>
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# Storm Sewer Pollution Control Fee and Credit Program

## CUSTOMER SERVICE

- On July 12, 2021 it was reported to Town Council that Storm Sewer Utility staff had calculated estimated impervious area fees for 293 properties, including 92 Borough-owned properties. Staff also consulted with numerous single-family residential customers.
- On November 5, 2021 a notice was mailed to all proposed non-single-family residential customers to indicate their current Storm Sewer Pollution Control Fee and proposed 2022 fee at \$5 per ERU per month. Staff have fielded calls from approximately 40 customers.
- Staff are preparing a notice to approximately 50 non-single-family residential customers that do not currently have utility accounts with the Borough. These are lots with impervious areas only, with no structures currently served by Borough utilities. 19 are Borough-owned parking lots.

**STORM SEWER POLLUTION CONTROL FEE NOTICE**

This is an important notice that pertains to the Billing For Utility Services statement you receive each month from the Borough of Chambersburg. Your statement includes a Storm Sewer Pollution Control Fee that is currently calculated according to the number of sanitary sewer connections listed on your utility account.

	<b>BILLING FOR UTILITY SERVICES</b> BOROUGH OF CHAMBERSBURG 100 SOUTH SECOND STREET P.O. BOX 1607 CHAMBERSBURG, PA 17291-0909	BILLING (MAILED) DATE: ACCOUNT NUMBER: ADDRESS OF ACCOUNT:
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ADDRESS OF ACCOUNT: <ENTER ADDRESS OF ACCOUNT>  
OWNER: <ENTER OWNER>

<ENTER CUSTOMER NAME>  
<ENTER CUSTOMER ADDRESS>  
<ENTER CUSTOMER ADDRESS>  
<ENTER CUSTOMER ADDRESS>

The 10-member elected Town Council establishes the Storm Sewer Pollution Control Fee and the way in which it is calculated and administered by the Storm Sewer Utility. Please be advised that Town Council intends to approve a new Storm Sewer Pollution Control Fee and Credit Program to be implemented with your Billing For Utility Services statement for January 2022.

In 2021 your monthly Storm Sewer Pollution Control Fee is calculated by multiplying \$5 by the number of sanitary sewer connections on your property.

**2021 MONTHLY FEE: <ENTER FEE>**

In 2022 your monthly Storm Sewer Pollution Control Fee will be calculated by multiplying \$5 by the total impervious area on your property. Impervious areas are made up of surfaces that prevent the percolation of water into the ground, including buildings and paved areas on your property. Sidewalks along property frontage within the street right-of-way will not be included in impervious area calculations. The new impervious area fee will apply to all properties except those developed with single-family dwellings, including multi-family residential, commercial, manufacturing and institutional such as government-owned properties.

**2022 MONTHLY FEE: <ENTER FEE>**

Credits will be offered as a way to reduce your monthly Storm Sewer Pollution Control Fees by installing and maintaining structural Best Management Practice facilities on your property to reduce the contribution of stormwater and pollutants to the Borough storm sewer system.

You can also reduce your Storm Water Pollution Control Fee by reducing the amount of impervious area on your property. This can be accomplished by removing buildings or parking lots that are part of the impervious area being used by the Borough to establish your Storm Sewer Pollution Control Fee.

If you would like to learn more about the new Storm Sewer Pollution Control Fee and Credit Program, and how it will impact your property, please contact Andy Stottlemeyer, Storm Sewer System Manager, at 717-251-2434 or [astottlemeyer@chambersburgpa.gov](mailto:astottlemeyer@chambersburgpa.gov). You can also visit the Borough website at [www.chambersburgpa.gov](http://www.chambersburgpa.gov) and select Storm Sewer Utility from the Departments menu.

# 2022 Revenue and Expenditures

REVENUE SOURCE	\$5 PER MONTH	\$3 PER MONTH	\$1.50 PER MONTH
Storm Sewer Pollution Control Fee	\$1,364,940	\$818,964	\$409,482
Hamilton & St. Thomas Township	\$5,000	\$5,000	\$5,000
Other revenue	\$5,000	\$5,000	\$5,000
Total	\$1,374,940	\$828,964	\$419,482

2022 BUDGET OPTIONS	\$5 PER MONTH	\$3 PER MONTH	\$1.50 PER MONTH
Revenue	\$1,374,940	\$828,964	\$419,482
Operations	\$400,000	\$400,000	\$400,000
Maintenance	\$487,470	\$214,482	\$19,482
Capital Improvements	\$487,470	\$214,482	\$0

*As reported to Town Council on July 12, 2021, the Storm Sewer Utility has been fortunate to receive substantial state and federal grant support to date, however, regardless of the per month fee amount approved for 2022, including \$2,000,000 from ARPA already approved by Council, there will still be a need for grant funding to support maintenance and capital improvements, including the important project to hire a contractor for pipe camera inspection and cleaning and projects contained in the Chesapeake Bay Pollutant Plan. As reported by Herbert, Rowland & Grubic in 2019, financial needs to maintain and improve the storm sewer system are great. Unfortunately, grant funding alone will not meet the need long-term. Increased revenue from the Storm Sewer Pollution Control Fee is imperative to establish a capital budget to appropriately support the Storm Sewer Utility.*

# Action Requested by Town Council

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- As directed by Town Council on July 12, 2021, a Draft Ordinance was advertised in preparation for Council to consider approving on November 22, 2021 to formally adopt the new Storm Sewer Pollution Control fee based on impervious coverage for each lot with a credit system to offset fees. The Ordinance would change the fee calculation methodology and establish the credit and appeal system but does not set the rate of the monthly fee. The rate and its impact on customers is a separate decision. Staff recommends approval of the Ordinance.
- As directed by Town Council on July 12, 2021, a Storm Sewer Management Program Credit Policy Manual was created. Staff recommends approval of the Manual.
- Town Council needs to establish, separately from the Ordinance and Manual decisions, the Storm Sewer Pollution Control fee rate for 2022. Council needs to decide whether an ERU should be \$5, \$3 or \$1.50 per month to begin with the first full utility billing cycle in January 2022. Staff recommends that one of these fee amounts be selected based on the information contained in this presentation.
- On December 13, 2021 Town Council will be asked to consider amending the Master Fee Schedule to insert Storm Sewer Utility fees for ERUs and fees for the escrow account for credits and recording of Agreements, as contemplated through the Credit Policy Manual. The Master Fee Schedule will also be amended to indicate that cemeteries are exempt from the Storm Sewer Pollution Control Fee and that Agriculture/Farm properties will be charged one ERU per month.