
From: Nancy Alyanak <bc98229@comcast.net>
Sent: Thursday, September 06, 2018 9:19 AM
To: LWStormwaterUtility
Subject: Does where stormwater projects are placed define how stormwater fees are assessed ?

Re: Does where stormwater projects are placed define how stormwater fees are assessed ?

Public Comment September 5, 2018

How Service Area fees are assessed and where stormwater projects are placed are two distinct issues.

Ecology determines where stormwater projects are placed by the way the TMDL is calculated. The calculation targets developed property. In the county watershed, most developed property is residential.

The legislature determines how the service area projects are funded. The legislature determined fees can be directed at almost all property -- developed, undeveloped, residential, commercial, agricultural -- everything except logging. If the property receives a benefit, no matter how intangible, the legislature put it in the fee base. If a property contributes stormwater runoff, be it developed or untouched, it is in the fee base.

The Homeowners Incentive Program (HIP) is an example. HIP serves Basin 1 & 2 homeowners. The Basin 3 homeowner benefit is intangible.

Because ecology chose to focus on developed property does not limit where Service Area fees can be assessed. County council has not limited fees to developed property. County council has not yet discussed that problem.

Choice of fee structure is wide open, so what do other jurisdictions use ? The National Association of Flood and Stormwater Management Agencies prepared the GUIDANCE FOR MUNICIPAL STORMWATER FUNDING. Their guidance differs somewhat from the FCS approach.

The association guidance points out Bellevue and Tacoma use rate structures based on the gross area of each property and its intensity of development. Gross area is determined for all properties and an intensity rating is assigned to each. This approach allows service charges to developed and undeveloped properties.

A similar rate structure approach combines gross area of each property and its impervious coverage. Units of gross area are charged a basic rate, and a surcharge is applied to units of impervious coverage. This approach allows service charges to developed and undeveloped properties.

In contrast, a fee structure based solely on the impervious coverage of each property or on the percent of impervious coverage on each property specifically targets developed properties only. Using either of these last two methods targets residential property, which is a small part of the perspective rate base.

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