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Western Kentucky University Stormwater Utility Survey 2010

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Western Kentucky University Stormwater Utility Survey 2010





C. Warren Campbell

Preface to the 2010 Survey

The WKU Survey appears to be gaining some traction in the stormwater community. It was cited in hearings that led to the formation of the Oldham County, Kentucky SWU and in the feasibility study for a stormwater utility in Newark, Delaware. This survey provides data on more than 1100 stormwater utilities that support either flood mitigation or water quality efforts or both.

As a former local official, I began this survey to help my community develop a stormwater utility. The goal of these surveys has always been to help communities develop stormwater utilities that will both meet the needs of the community and withstand court challenges. However, this data is in the public domain and is free to both proponents and opponents of stormwater utilities. As you use the data herein, please keep this in mind. Also, keep in mind that I am an engineer and not a lawyer.

As the disclaimer below says, the methods used to obtain the data are prone to error. It is particularly difficult to find data on SWUs in small communities that don't have the resources to support a comprehensive web page. I have made every effort to both scrub the data and keep it updated. However, with more than 1100 SWUs currently this is a monumental task. If you are aware of mistakes or omissions in the data, please contact me at 270-745-8988 or by email at warren.campbell@wku.edu. If you use email, please put a clear subject in the email. I receive more than 100 emails a day, and if there is not a recognizable subject line, I may miss your input. As always, thanks in advance for your help.

Warren Campbell Bowling Green, Kentucky June 9, 2010

DISCLAIMER

The main goal of this survey was to identify as many U.S. Stormwater Utilities (SWUs) as possible. Because many stormwater professionals do not have the time to respond to questionnaires, our primary method of identification was Internet searches. We searched on key terms such as "stormwater utility", "stormwater fee", and "drainage fee". We scoured on-line municipal codes such as Municode, AmLegal, LexisNexis, and others. We went through many city web sites trying to find utilities. The approach used is prone to errors and we hope the readers of this document will help us correct them.

In some cases, it is difficult to tell whether the community has a stormwater utility or not. Some communities have enacted the right to charge a stormwater user's fee, but have not actually enacted a fee. If the right to charge a recurring fee dedicated to stormwater was enacted, we counted it as a SWU. When one of our students contacted a community official, she said they did not have a SWU but wished they did. However, they did charge a stormwater fee of \$ 0.55 per month. This raises the question of the definition of a SWU. By our definition, a SWU is a funding approach requiring residents to pay a recurring charge that supports community stormwater initiatives. The fee is dedicated to the maintenance, design, construction, and administration of the stormwater system.

The opinions expressed in this document are those of the author. They are not official opinions of Western Kentucky University, its administration, nor of any other individuals associated in any way with the University. The author is an engineer so that any opinions expressed should not in any way be construed by any individual or organization as sound legal advice. The use or misuse of any of the data and information provided herein is the sole responsibility of the user and is not the responsibility of Western Kentucky University, its employees, students, or any organization associated with the University.

ACKNOWLEDGEMENTS

As always, the hard work of this survey was done by dedicated students in my CE 300 Floodplain Management class. Students contributing to the 2010 Survey were:

Alex Krumenacher, CFM Nick Lawhon, CFM Austin Shields, CFM Adam Disselkamp, CFM Kenneth Marshall Wesley Poynter, CFM Tyler Williams, CFM

Since the 2010 survey is built on the foundation of our earlier surveys, it is important to recognize contributors from previous years. Students contributing to the 2009 survey were:

Brittany Griggs
Lisa Heartsill, CFM
Spenser Noffsinger, CFM
Pat Stevens
Tony Stylianides, CFM
Scott Wolfe, CFM

These students contributed to the 2008 survey:

Darren Back, CFM
Robert Dillingham, CFM
James Edmunds
Scott Embry, CFM
Clint Ervin
Catie Gay, CFM
Sean O'Bryan, CFM
Casey Pedigo
Broc Porter
Kelly Stolt, CFM
Ben Webster, CFM

These students contributed to the 2007 survey.

Jon Allen
Karla Andrew, CFM
Eric Broomfield, CFM
Kevin Collignon, CFM
Heath Crawford, CFM
Adam Evans
Cody Humble
Steve Hupper, CFM

Christine Morgan, CFM
Jeremy Rodgers, CFM
Matt Stone, CFM
Kyle Turpin, CFM
Kal Vencill, CFM

The author is grateful to all of these students who have participated in the survey over the past years. They have worked diligently at a somewhat tedious job, but one that should have taught them something about stormwater financing, municipal codes, and websites.

We are also indebted to AMEC for sharing their list of stormwater utilities with us. In 2008, Scott Embry had the foresight to ask them for it and they obliged. We continue to have a good relationship with AMEC.

We thank Tricia Harper for proofreading this document. Any remaining errors and typos occurred because we overwhelmed her with them. These errors are the responsibility of the author.

Finally, we have borrowed data from the other stormwater utility surveys cited in the references. In some cases, we have updated data such as fees, and any mistakes should be considered primarily the fault of the author of this document.

Introduction

As in the 2009 survey, Florida and Minnesota have more than 100 SWUs, but Washington has 99 (that we were able to find) and Wisconsin has 95. Florida is approaching 200. Texas was the big gainer this year going from 46 to 66 SWUs. Communities continue to form stormwater utilities with an increasing emphasis on stormwater quality. However, with the flooding that occurred this year in Tennessee, I expect to see the formation of more utilities there. Figure 1 shows the 2010 stormwater utilities by location.

One community official said, "We are too small to have a stormwater utility." The smallest community with a stormwater utility that we have found is Indian Creek Village, Florida with a 2000 census population of 33 (no, this is not a misprint). The largest community is Los Angeles with a population exceeding 3,000,000. No community is too small or too large to have a stormwater utility. The average size of a SWU community is about 82,000.

As this is written, our survey contains data on 1112 stormwater utilities (SWUs) located in 38 states and the District of Columbia. Based on our current find rate, my best guess would be that there are between 1200 and 1500 SWUs in the U.S. More are being formed all the time and we are aware of several that will form within the next few months. Figure 2 shows the numbers of stormwater utilities by state.

For the 572 communities for which we were able to find Equivalent Residential Units (ERUs), the average was 3,000 square feet of impervious area and the median ERU was 2,700 sq ft. A community's ERU is the average area of hard surface of a single family residential property. It includes building footprints, sidewalks, driveways, decks, etc.

The average monthly single family residential fee was \$4.12 and the median fee was \$3.50. Most fees go up over time reflecting an increase in the Consumer Price Index (CPI). Some communities actually tie the monthly fee to the CPI. Several communities have reduced their fees.

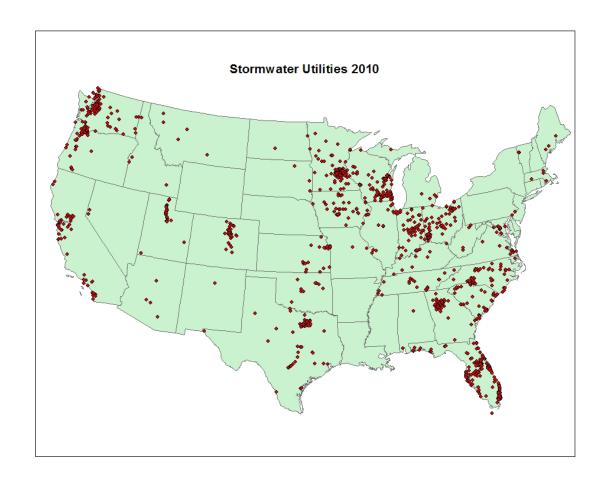


Figure 1. U.S. stormwater utilities (SWUs)

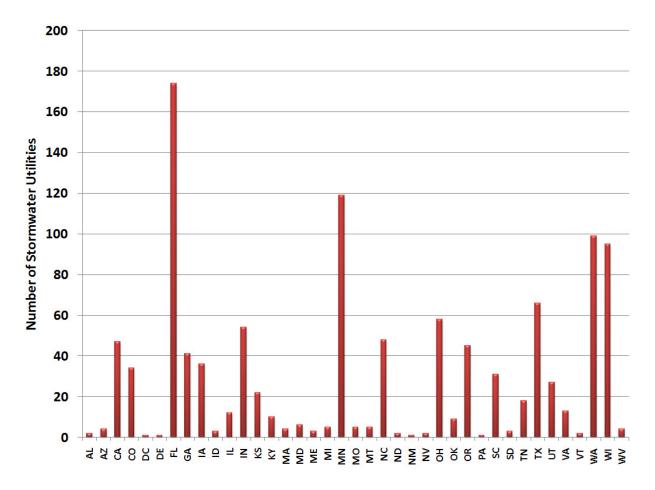


Figure 2. Stormwater utilities by state

Recently, Mulcahy (2006) addressed the issue of effectiveness of a stormwater utility using a set of metrics developed for that purpose. While one can argue with her choice of metrics, the idea of gauging a SWU's effectiveness quantitatively is a good one. The 2008 survey (Campbell and Back [2008]) addressed this qualitatively. A good stormwater utility in my opinion is one with the following characteristics:

- 1. Provides adequate funding to meet the legitimate stormwater needs of the community
- 2. Is fairly apportioned according to the amount of stormwater burden produced by a parcel
- 3. Has a fee system that is simple enough to be readily administered
- 4. Can stand up in court
- 5. Can withstand political challenges

Characteristic 1 is important but many community officials often feel pressure to enact a system of fees they know will not meet community needs because of political considerations. When an inadequate fee is enacted, expectations are often not met. Political support can evaporate and a SWU ordinance can be repealed. A well-structured fee system will meet community needs and expectations and yet not be excessive. The culture in some communities will support a stormwater fee more easily than in others. Unfortunately, political realities or perceived realities often govern the setting of a fee. While it is

desirable to have elected officials show the character to set an appropriate fee, a politician who cannot be re-elected will be unable to champion stormwater causes.

Failure to create a SWU ordinance with Characteristic 2 embedded can lead to legal exposure. At least one community (Arvada, Colorado) calculates a different fee for every property based on the amount of impervious area on the parcel. Because of the nexus between impervious area and the amount of stormwater and contamination produced, this is a very fair way to assess a fee. However, problems of billing complexity make this approach infeasible for many communities. For them, a fee system is a compromise between fair apportionment and ease of administration. There is some conflict between Characteristics 2 and 3.

Characteristic 4 is a question of great concern to every one of the stormwater utility communities. There are many aspects of the ability to withstand a legal challenge, and these vary according to state law. More information is provided in the following section.

Characteristic 5 is a rising concern and politicians and citizens in some communities are attempting to repeal SWU ordinances. Strategies take at least three forms: 1) repeal of the ordinance, 2) creation of ordinances or statutes that make it harder to enact a SWU, and 3) opposition to enabling legislation.

Some residents in Florida tried to pass a state law that required any new fee or tax to be voted on by the citizens of the affected community. This would make it much more difficult and expensive to pass a SWU since instead of educating a committee of prominent citizens, the education would have to be extended to the whole community, many of whom are not inclined to listen to someone asking for another fee.

Challenges to Stormwater Utilities

We have continued our search for SWUs challenged in court. These challenges can take several forms. It may be the stormwater utility that challenges a state agency that believes the local government has exceeded its authority by levying a fee on a state agency. Most of the challenges are by groups of residents, businesses, school districts, and/or churches who do not wish to pay the fee.

Figure 3 shows the map of utilities challenged and the outcomes to date that we were able to identify. Two of the stormwater utilities in Kentucky have been challenged and these were added to the map from last year. The figure shows five SWUs that were struck down: Port Saint Lucie (Florida), Atlanta (Georgia), Lansing (Michigan), Topeka (Kansas), and Salinas (California). Of these, Port Saint Lucie and Topeka have ERU-based fee systems. Atlanta used a system based on parcel size. The fee systems of Lansing and Salinas are not known. This survey provides ERUs for 572 utilities. At least two have been successfully challenged in court. The map shows 29 SWUs that have faced court challenges. Of the 29, 21 were upheld, 3 are pending, and 5 were struck down. Of the 21 upheld, 14 used an ERU based system, 4 used another system, and the fee system of the other 3 is unknown (by this survey).

The map of Figure 3 is by necessity simplified. For example, the classifications "upheld" or "struck down" may not be clear. In the case of Durham, though the city had to refund some fees collected, the court affirmed the use of an ERU system as a valid and fair method of assessing fees. So was the fee upheld or struck down? I elected to show it on the map as upheld.

Usually, the people who are likely to challenge stormwater utilities come from one of the following groups.

- 1. Tax-exempt organizations
- 2. Residential home owners
- 3. Business owners
- 4. People on fixed income
- 5. State or Federal agencies

The grounds for these challenges are most often one of the following.

- 1. The fee is actually a tax.
 - a. Some states require that taxes be approved by the voters and this wasn't.
 - b. Since it is a tax, tax-exempt organizations should not have to pay.
- 2. Some states require that a fee be voluntary. For example, you can choose to have electricity or water service. If the fee is not voluntary, then it looks like a tax (see above). In some states, the use of a credit system is very important. If no credit is given even if a parcel has constructed stormwater measures that reduce outflow from the property significantly, a SWU can face legal exposure.
- 3. The use of the fee exceeds the authority granted in state law.
- 4. The fee is not fairly apportioned according to burden placed on the stormwater system.
- 5. The City does not really need that much money to take care of stormwater needs.

Central to protecting a SWU from legal challenges is the apportionment of the fee. To be bulletproof in court, there must be a nexus between the service provided and the fee. Also, allowing credit, that is, fee reductions, for using stormwater Best Management Practices (BMPs) may be desirable in many states.

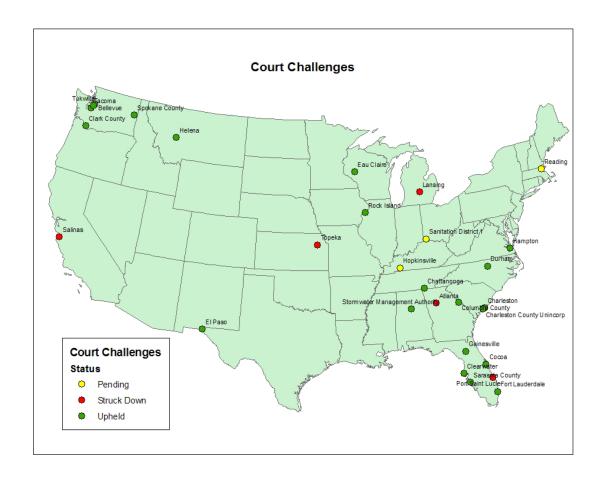


Figure 3. Stormwater utility court challenges and outcomes.

Analysis

Apportionment of the fee is critical for a stormwater utility. The fee should be perceived by the public and by businesses as fair. Some SWUs are intended to support a community's water quality initiatives and permitting as a Phase I or Phase II community under EPA permitting requirements. The focus of these SWUs is water quality rather than quantity. Some communities are funding water quality projects under their utility so that the public can see some value coming from the fees they pay. Many residents don't feel they are getting anything from a stormwater utility if its only purpose is to do the paperwork required for the city's stormwater permit.

The best way to determine a fee is to identify the legitimate stormwater needs of the community and set the fee accordingly. If the SWU revenue is used to address flooding and water quality, acceptable uses of revenues should include the cost of design and construction of capital improvement projects, maintenance of stormwater systems, salaries of staff, education and outreach, and administrative costs.

Once the legitimate needs of the community are identified, then the fee should be adjusted to provide the needed revenue. If an ERU-based fee is used, the first step is to identify the ERU. A community may not have the revenue initially to pay for this analysis. Some communities enact the SWU using general guidelines or results from nearby, similar communities. Initial fees are set, and revenue is collected. Then the community can contract for the needed work. It is a good idea to hire a company with experience in setting up utilities to do this. These companies will normally use GIS information from the community to estimate the ERU. For larger communities, this is normally done by generating a random sample of single family residential properties and identifying the impervious surface on each parcel in the sample. The average over the sample of parcels is the estimated ERU.

An accurate estimate of the ERU is very important. If the ERU estimate is too small, residential customers will pay less than their fair share and nonresidential customers will pay more. If the estimate is too large, nonresidential customers will pay less than their fair share and residential customers will pay more. This was discussed in more detail in the 2009 Survey (Campbell, 2009). Figure 4 is a map of ERUs for the U.S. The small dots indicate stormwater utilities that either use a method other than the ERU method, or for which no ERU could be found.

Once the ERU is known, the next step is to determine the number of ERUs in the community. This involves determining the impervious area of all non-residential properties or by sampling these properties in each zoning category and then estimating the number of nonresidential ERUs. Once the number of community ERUs is known, the fee can be set by dividing the required annual revenue by 12 to get the total monthly revenue. The total monthly revenue is divided by the number of community ERUs to get the monthly base fee.

While the ERU system is widely used and accepted, some cities opt for other methods. At least one community bases its SWU fee on water usage. Others base it on the number of water meters. While these would bear some correlation to the amount of development, the relation to stormwater volume produced seems less direct than for the ERU system. In Minnesota, the Residential Equivalence Factor is popular. The volume of stormwater produced for a selected storm is determined for the average single family residential property. The fee for other properties is related to the volume of runoff produced for the given storm as compared to that for an average single family residential property. This approach seems reasonable and usually produces a fee more closely related to stormwater quantity (flooding) than the ERU method.

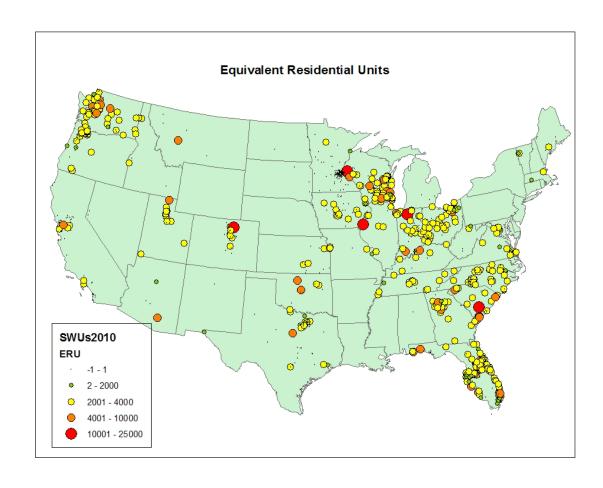


Figure 4. Distribution of monthly Equivalent Residential Units (ERUs) across the U.S.

The other commonly used fee method is the tier system. In a tier system, a group of tiers are selected based on the amount of impervious area. Within each tier a single monthly fee is assessed. It has a simplicity advantage over the ERU system because parcels are divided into a few groups so that only a few different fees are levied. As pointed out by Andy Reese (AMEC Environmental, personal communication, 2010) an ERU system is just a tier system with an infinite number of tiers. For reasons to be discussed, the tier system can have some disadvantages in terms of fairness for all property owners. To understand this, consider the following example.

Tier System Example

Consider a hypothetical community that settles on a tier system. Assume that the actual ERU is 3,000 square feet impervious. However, the community settles on the residential and nonresidential tier system given in the tables below. In the tables, Amin is the lower value of the impervious area for a given tier and Amax is the upper value of impervious area for the tier. From the table, one inequity is immediately obvious. A nonresidential property with 50,000 square feet of impervious area pays a monthly fee of \$64 whereas a property with 50,001 square feet of impervious area pays a fee of \$128. There are other inequities as well.

Residential			
Amin	Fee		
(sq ft imprv)	(sq ft imprv)		
0	2000	\$2	
2001	4000	\$4	
4001	6000	\$6	
6000	8	\$8	

Nonresidential			
Amin	Amax	Fee	
(sq ft imprv)	(sq ft imprv)		
0	2,000	\$4	
2,001	5,000	\$8	
5,001	10,000	\$16	
10,001	20,000	\$32	
20,001	50,000	\$64	
50,001	100,000	\$128	
100,001	200,000	\$256	
200,001	500,000	\$512	
500,001	1,000,000	\$1,024	
1,000,001	8	\$2,048	

If we assume that an ERU-based fee is perfectly fair, then we can plot the ERU-based fees and the tier-based fees as a function of parcel impervious surface. For non-residential properties, this is done in Figure 5. From the figure, large homes with more than 6,000 square feet of impervious area will be paying less than they would pay under an ERU-based system. Meanwhile for ranges of impervious area where the red tier fee curve is above the blue ERU fee curve, the property owners or residents will be paying more under a tier system than they would under an ERU system.

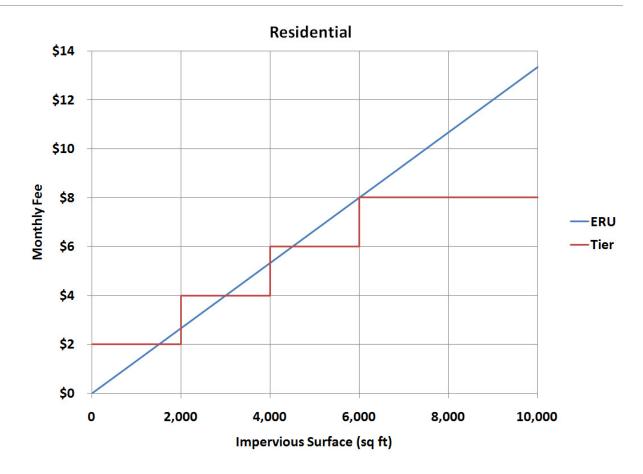


Figure 5. Comparison of the ERU-based fee and the tier-based fee

Figure 6 provides similar curves for nonresidential properties. At a glance, we can see who suffers under a tier system. In any tier system, very large properties will always pay less than under an ERU system. For the set of tiers of the hypothetical town, properties with more than 1,536,000 square feet impervious will pay less than under an ERU system. A second observation is that parcels with less than 300,000 square feet impervious will be paying more under the tier system than under an ERU system as would properties with between 1,000,001 and 1,536,000 square feet impervious.

From Figures 5 and 6, it is apparent that the more tiers, the closer the tier system can be made to the ERU system. Figure 7 illustrates that within a given tier, the fee that gives the least deviation from the ERU fee is the fee that is the average of the two ERU fees at the end points. In this sense, the tier fee system of Figure 7 is the best for that set of tiers. To obtain the tier with the largest impervious area, we have assumed that 2,000,000 square feet of impervious area is the largest that would be encountered in the community.

For the "best" tier system, within each tier properties in the lower half of the tier will be assessed more than the ERU based fee and the upper half of the tier will be assessed less. The residential tier fee shows some ranges of impervious area that are being overcharged relative to an ERU-based fee. However, many communities use only one residential tier and have not been challenged in court.

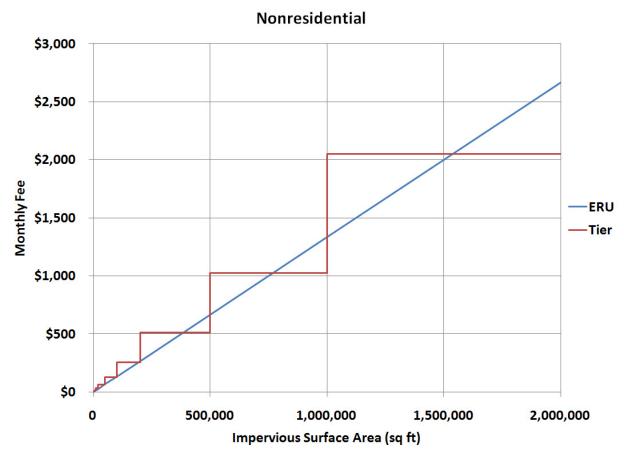


Figure 6. Comparison of ERU-based and tier-based fees for nonresidential properties

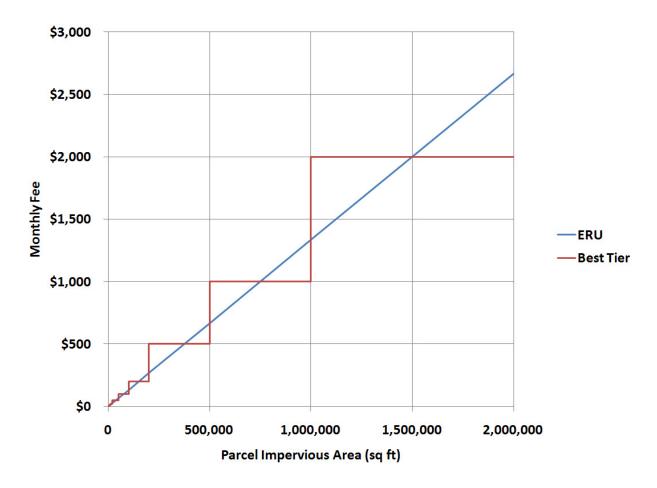


Figure 7. Plot of fee system giving the least deviation from the ERU fee within each tier

Figure 8 shows the distribution of single family monthly fees across the U.S. It shows that high fees do not necessarily cluster in one area. States with SWUs charging high base fees also have SWUS with very low base fees.

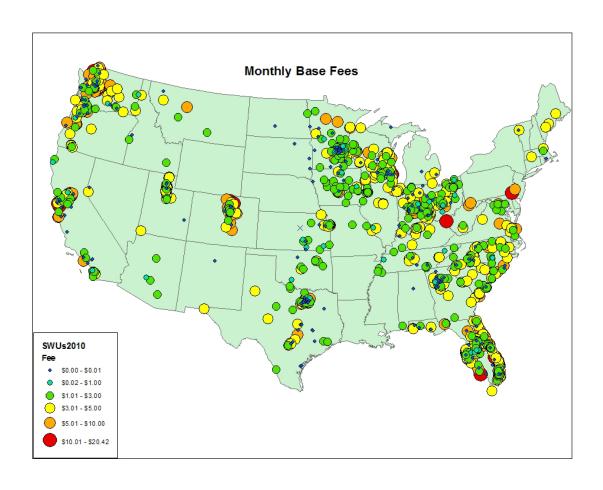


Figure 8. Distribution of stormwater utility fees across the U.S.

Figure 9 shows the growth in the number of SWUs by year. Local peaks in growth rate occur in 1993 and in 2004. The peak in 1993 may be related to the Midwest flooding and Hurricane Andrew in 1992. The peak in 2004 shows growth in SWUs in smaller communities and is influenced by the effective date of EPA Phase II rules. Figure 9 shows a decline in the rate of formation of SWUs in 2009. This may reflect a leveling off of SWU formation following the flurry of formation caused by the EPA Phase II rules.

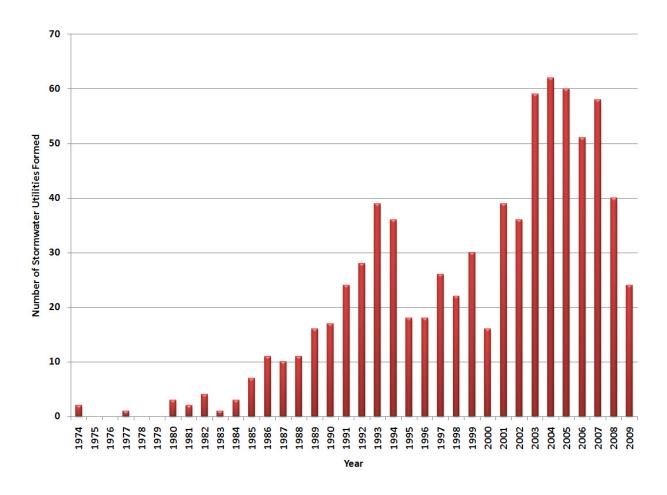


Figure 7. Stormwater utilities by year

Summary

The 2009 Survey (Campbell, 2009) identified 1022 stormwater utilities. This survey identified 1112. Thirty-eight states and the District of Columbia have at least one stormwater utility. Two states (Florida and Minnesota) now have more than 100 SWUs, Washington and Wisconsin will soon join the century club if they haven't already. Seven have more than 50, and 16 states have 20 or more stormwater utilities. The peak in SWU formation in 2004 that was caused by EPA Phase II rules seems to have passed and the formation rate appears to be returning to the rate observed between 1995 and 2000. However, the growth in the number of stormwater utilities continues and today, our best guess is that there are 1,200 to 1,500 stormwater utilities in the U.S. alone. Communities in Canada are also beginning to form them, though these are not covered here.

Stormwater utilities continue to face legal and political challenges. Politicians are elected on the promise of repealing the "rain tax." SWUs are challenged in court by parties who assert the fee is a tax, or that the fee is not fair, or for other reasons given here. An ideal stormwater utility has the following characteristics:

- 1. Provides adequate funding to meet the legitimate stormwater needs of the community
- 2. Is fairly apportioned according to the amount of stormwater burden produced by a parcel
- 3. Has a fee system that is simple enough to be readily administered
- 4. Can stand up in court
- 5. Can withstand political challenges

A strong factor determining the ability of stormwater utilities to withstand legal challenges is the fee system. However, no fee system is a guarantee against legal challenges. The ERU system is considered to be an equitable method of setting fees, yet Port Saint Lucie, Florida and Topeka, Kansas use ERU systems and both were successfully challenged in court. At least fourteen other ERU system stormwater utilities were challenged unsuccessfully in court. Any community interested in creating a stormwater utility should give strong consideration to hiring a company with experience in this field.

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Raw Data Tables

The following data tables provide the information collected on 1022 stormwater utilities. Communities with an "x" in the ERU column use the tier or REF or another fee system so that no ERU is used. The ERU column is blank when neither an ERU nor a determination can be made if an alternate system was used.

1 Stormwater Management Authority AL x \$0.42 2 Mobile AL \$3.00 \$3.122 3 Flagstaff AZ 1500 \$1.22 4 Mesa AZ x \$1.50 5 Oro Valley AZ 5000 \$2.90 6 Peoria AZ 5000 \$2.90 7 Albany CA \$3.75 7 Albany CA \$1.96 9 Berkeley CA \$1.96 \$1.96 \$1.92 \$1.96 9 Berkeley CA \$1.92 \$1.92 \$1.92 \$1.92 \$1.92 \$1.92 \$1.92 \$1.92 \$1.92 \$1.93 \$1.92 \$1.92 \$1.92	No.	Community	State	ERU	Monthly Fee
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39 San Bruno CA \$3.85	39	San Bruno	CA		\$3.85
40 San Diego CA \$1.95					
41 San Jose CA \$4.53					
42 San Marcos CA \$1.77	42				
43 Santa Clara County CA					
44 Santa Clarita CA \$2.00	44	·			\$2.00
45 Santa Cruz CA \$1.77					
46 Santa Monica CA x	46	Santa Monica	CA	Х	
47 Santa Rosa CA \$1.96	47	Santa Rosa	CA		\$1.96

No.	Community	State	ERU	Monthly Fee
48	South San Francisco	CA		
49	Stockton	CA	2,347	\$2.10
50	Tracy	CA	3,140	\$1.20
51	Vallejo	CA	0,110	\$1.97
52	Vista	CA		\$1.80
53	Woodland	CA		\$0.48
54	Arapahoe County	CO		\$5.00
55	Arvada	СО		\$4.30
56	Aurora	СО		\$7.70
57	Berthoud	СО		\$2.50
58	Boulder	CO		\$6.55
59	Canon City	СО		\$4.00
60	Castle Rock	CO	2,458	\$6.61
61	Colorado Springs	CO	2,273	\$6.00
62	Denver	CO		\$5.81
63	Englewood	CO	3,000	\$1.39
64	Erie	CO	Х	\$5.00
65	Evans/Lasalle	CO	20,000	\$3.71
66	Federal Heights	CO	1,944	\$3.15
67	Firestone	CO		
68	Fort Collins	CO	Х	\$14.26
69	Fountain	CO		
70	Frederick	CO	2,500	\$6.23
71	Golden	CO		\$3.20
72	Greeley	CO	Х	\$13.34
73	Idaho Springs	CO		
74	LaFayette	CO		\$4.27
75	Lakewood	CO		\$1.98
76	Larimer County	CO	X	\$6.90
77	Littleton	CO		\$2.00
78	Longmont	CO		\$7.13
79	Louisville	CO		\$2.00
80	Loveland	CO		\$10.39
81	Northglenn	CO		\$2.00
82	Parker	CO	3,738	\$6.00
83	Pueblo	CO		\$6.25
84	Southeast Metro Stormwater Authority	CO	Х	\$6.90
85	Westminster	CO	Х	\$1.50
86	Windsor	CO		\$3.98
87	Woodland Park	CO		\$2.00
88	Washington	DC	1,000	\$2.57
89	Wilmington	DE		\$11.94
90	Alachua County	FL		
91	Altamonte Springs	FL	2,492	\$5.75
92	Anna Maria	FL	2,254	\$3.75
93	Apopka	FL	X	\$2.08
94	Atlantic Beach	FL	1,790	\$4.00

No.	Community	State	ERU	Monthly Fee
95	Auburndale	FL	Х	\$0.75
96	Aventura	FL	1,548	\$2.50
97	Bartow	FL	2,520	\$3.75
98	Bay County	FL	X	\$3.33
99	Bay Harbor Islands	FL	1,548	\$5.00
100	Belle Glade	FL	1,040	ψ0.00
101	Belle Isle	FL	4,087	\$4.00
102	Boca Raton	FL	2,837	\$2.90
103	Boynton Beach	FL	1,937	\$5.00
104	Bradenton	FL	1,700	\$2.50
105	Bradenton Beach	FL	X	\$8.33
106	Brevard County	FL	2,500	\$3.00
107	Callaway	FL	2,000	ψ3.00
107	Cape Canaveral	FL	2,074	\$3.00
109	Cape Coral	FL	10,000	\$6.25
110	Casselberry	FL	2,309	\$2.90
111	Charlotte County	FL	X 2,309	\$3.00
112	Clearwater	FL	1,830	\$9.91
113	Clermont	FL	3,154	\$3.00
114	Cocoa	FL	2,166	\$3.00
115	Cocoa Beach	FL	2,100	\$6.00
116	Coconut Creek	FL	2,900	\$2.65
117	Collier County	FL	2,070	φ2.05
117	Coral Gables	FL	2,428	\$3.50
119		FL	1,661	\$6.00
120	Daytona Beach DeBary	FL	2,560	\$7.00
120	De Land	FL	4,900	\$5.81
121	Delray Beach	FL	2,502	\$5.33
123	Deltona	FL	3,484	\$6.26
123	Doral	FL	1,548	\$4.00
124	Dundee	FL	1,346	\$1.00
126	Dunedin	FL	1,708	\$6.00
	Eagle Lake	FL	1,700	
127 128	Edgewater	FL	2,027	\$4.00 \$6.00
129	El Portal	FL	1,548	\$3.00
130	Eustis	FL	2,187	\$3.00
131	Florida City	FL	1,250	\$3.00 \$2.50
131	Fort Lauderdale	FL		\$2.90
133	Fort Meade	FL	X	\$4.25
134	Fort Myers	FL	2,931	Ψ4.23
135	Fort Pierce	FL	2,931	\$4.50
136	Fort Walton Beach	FL	2,100	Ψ4.50
136	Frostproof	FL		\$3.00
137	Gainesville	FL	2 200	
138	Golden Beach	FL	2,300	\$6.95 \$2.92
	Grant-Valkaria	FL	8,000	
140			2,500	\$3.00
141	Griffin	FL	2,200	\$2.95

No.	Community	State	ERU	Monthly Fee
142	Gulf Breeze	FL	4,450	\$3.50
143	Gulfport	FL	2,300	\$2.87
144	Haines City	FL	1,935	\$2.00
145	Hallandale Beach	FL	958	\$2.50
146	Hernando County	FL	000	Ψ2.00
147	Hialeah	FL	1,664	\$2.50
148	Hialeah Gardens	FL	1,267	\$2.00
149	Hillsborough County	FL	1,800	\$1.00
150	Holly Hill	FL	2,050	\$3.00
151	Hollywood	FL	2,250	\$2.69
152	Homestead	FL	2,000	\$3.18
153	Indian Creek Village	FL	χ	φο. το
154	Indian Harbor Beach	FL	2,500	\$3.00
155	Jacksonville	FL	3,100	\$5.00
156	Jacksonville Beach	FL	1,541	\$5.00
157	Jupiter	FL	2,651	\$4.37
158	Key Biscayne	FL	1,083	\$7.50
159	Key West	FL	1,400	\$7.05
160	Kissimmee	FL	2,404	\$6.68
161	Lake Alfred	FL	2,404	\$2.00
162	Lake Mary	FL	4,576	\$3.00
163	Lake Worth	FL	1,748	\$5.80
164	Lakeland	FL	5,000	\$4.50
165	Largo	FL	2,257	\$3.57
166	Lauderdale-by-the-Sea	FL	4,472	\$3.50
167	Lauderdale Lakes	FL	2,133	\$4.57
168	Lauderhill	FL	χ	\$6.00
169	Leesburg	FL	2,000	\$4.00
170	Leon County	FL	2,723	\$1.67
171	Longwood	FL	2,898	\$6.00
172	Madeira Beach	FL	_,000	\$5.00
173	Maitland	FL	2,532	\$7.25
174	Malabar	FL	X	\$3.00
175	Manatee County	FL		7212
176	Marathon	FL		\$5.00
177	Margate	FL	2,382	\$2.69
178	Marion County	FL	2,275	\$1.25
179	Martin County	FL		
180	Medley	FL	1,487	\$3.00
181	Melbourne	FL	2,500	\$1.80
182	Melbourne Beach	FL	2,500	\$1.50
183	Miami Beach	FL	791	\$3.25
184	Miami Gardens	FL		
185	Miami Shores	FL	1,435	\$3.25
186	Miami Springs	FL	X	\$3.67
187	Miami-Dade County	FL	1,548	\$4.00
188	Milton	FL		

No.	Community	State	ERU	Monthly Fee
189	Minneola	FL	1,100	\$2.00
190	Miramar	FL	3,619	\$2.50
191	Mount Dora	FL	2,500	\$3.50
192	Mulberry	FL	X	\$1.00
193	Naples	FL	1,934	\$11.84
194	Neptune Beach	FL	3,164	\$3.00
195	New Port Richey	FL	2,629	\$3.36
196	New Smyrna Beach	FL	1,515	\$2.50
197	Niceville	FL	7,500	\$2.65
198	North Bay Village	FL	2,415	\$2.25
199	North Lauderdale	FL	2,138	\$3.00
200	North Miami	FL	1,760	\$4.65
200	North Miami Beach	FL	1,800	\$4.50
201	North Redington Beach	FL	1,687	ψ4.50
202	Oakland Park	FL	1,507	\$6.00
203	Ocala	FL	1,948	\$4.00
204	Ocoee	FL	2,054	\$5.50
205	Oldsmar	FL	2,550	\$3.00
207	Opa-Locka	FL	1,548	\$1.90
207	Orange County	FL	1,540	φ1.90
209	Orlando	FL	2,000	\$11.49
210	Ormond Beach	FL	3,000	\$5.00
210	Oviedo	FL	2,464	\$6.00
211		FL	2,404	φ0.00
212	Palm Bay Palm Coast	FL	3,432	\$6.00
213	Palmetto	FL	1,999	\$3.68
214		FL	1,999	ა ა.00
215	Panama City Pasco County	FL	2,890	\$3.92
217	Pembroke Park	FL	1,548	\$5.67
217	Pensacola	FL		\$4.40
219	Pinecrest	FL	2,575 1,548	\$3.00
219	Plant City	FL	2,280	\$4.00
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221 222	Polk City	FL FL	X 2.880	\$1.50 \$3.00
222	Pompano Beach Port Orange	FL	2,880	\$3.00 \$6.25
223	Port Grange Port Saint Lucie	FL	3,050	
224	Redington Beach	FL	2,280	\$10.25 \$2.50
225	Riviera Beach	FL	1,920	\$4.50
227	Rockledge	FL	2,922	\$3.75
227	Safety Harbor	FL	1,865	\$3.75 \$3.50
228	•	FL		\$5.00
	Saint Augustine Saint Cloud		2,000	
230		FL FL	2,664	\$6.35
231	Saint Johns County	FL	2.710	¢c o c
232	Saint Petersburg		2,719	\$6.85
233	Sanford	FL	2,126	\$5.20 \$7.55
234	Sarasota County	FL	2.452	\$7.55
235	Sarasota County	FL	3,153	\$7.24

No.	Community	State	ERU	Monthly Fee
236	Satellite Beach	FL	3,000	\$3.50
237	Sebastian	FL	0,000	\$4.00
238	South Daytona	FL	2,000	\$5.00
239	South Miami	FL	1,865	\$3.00
240	Stuart	FL	3,707	\$3.76
241	Sunny Isles Beach	FL	1,548	\$2.50
242	Sunrise	FL	1,884	\$2.32
243	Surfside	FL	1,040	\$2.50
244	Sweetwater	FL	1,579	\$2.50
245	Tallahassee	FL	1,990	\$6.93
246	Tamarac	FL	1,830	\$8.60
247	Tampa	FL	3,310	\$3.00
248	Tarpon Springs	FL	1,945	\$5.65
249	Tavares	FL	3,000	\$3.00
250	Tequesta	FL	2,506	\$7.13
251	Titusville	FL	3,300	\$5.71
252	Treasure Island	FL	X	\$3.36
253	Umatilla	FL	3,000	\$4.00
254	Venice	FL	9,489	\$5.00
255	Volusia County	FL	2,775	\$6.00
256	West Melbourne	FL	2,500	\$3.00
257	West Miami	FL	1,400	\$2.50
258	West Palm Beach	FL	2,171	\$6.95
259	Wilton Manors	FL	3,460	\$3.50
260	Winter Garden	FL	4,077	\$4.00
261	Winter Haven	FL	X	\$2.68
262	Winter Park	FL	2,324	\$7.80
263	Winter Springs	FL	2,123	\$5.50
264	Athens - Clarke County	GA	2,682	\$3.50
265	Atlanta	GA		
266	Austell	GA		\$1.00
267	Barrow County	GA	3,478	\$1.50
268	Braselton	GA		
269	Canton	GA		
270	Cartersville	GA	3,000	\$3.75
271	Chamblee	GA	3,000	
272	Clayton County	GA		\$3.75
273	College Park	GA	3,523	\$3.00
274	Columbia County	GA	X	\$2.63
275	Conyers	GA	Х	\$3.33
276	Covington	GA	2,600	\$3.23
277	Decatur	GA	2,900	\$5.00
278	DeKalb County	GA	3,000	\$4.00
279	Doraville	GA	3,000	\$4.00
280	Douglasville-Douglas County	GA	2,543	\$4.00
281	Evans	GA		\$3.50
282	Fairburn	GA		

No.	Community	State	ERU	Monthly Fee
283	Fayetteville	GA	3,800	\$2.95
284	Garden City	GA	3,000	\$4.75
285	Gilmer County	GA	-,	•
286	Griffin	GA	2,200	\$4.28
287	Gwinnett County	GA	,	\$6.15
288	Henry County	GA	4,779	\$3.32
289	Hinesville	GA	2,635	\$4.25
290	Lawrenceville	GA	,	
291	Loganville	GA	3,000	\$4.00
292	McDonough	GA		\$0.00
293	Norcross	GA	100	\$5.43
294	Peachtree City	GA	4,600	\$3.95
295	Rockdale County	GA	3,420	\$3.39
296	Roswell	GA	4,100	\$3.95
297	Smyrna	GA	3,900	\$2.20
298	Snellville	GA		
299	Stockbridge	GA	2,000	\$2.92
300	Stone Mountain	GA		
301	Sugar Hill	GA	1,000	\$3.00
302	Valdosta	GA	3,704	\$2.50
303	Warner Robbins	GA	3,000	\$3.25
304	Woodstock	GA		\$4.20
305	Ackley	IA		
306	Ames	IA		\$2.60
307	Ankeny	IA	4,000	
308	Bettendorf	IA	2,500	\$1.50
309	Boone	IA	3,000	\$2.00
310	Buffalo	IA	Χ	\$2.00
311	Burlington	IA	25,000	\$2.00
312	Carroll	IA	Χ	\$3.00
313	Cedar Falls	IA		\$3.00
314	Cedar Rapids	IA		\$3.19
315	Centerville	IA	Χ	\$3.00
316	Clear Lake	IA		\$1.60
317	Clive	IA	3,667	\$3.25
318	Coralville	IA	Χ	\$1.25
319	Davenport	IA	2,600	\$1.60
320	De Witt	IA		\$2.50
321	Des Moines	IA	2,349	\$7.29
322	Dubuque	IA	2,917	\$4.00
323	Forest City	IA		\$5.00
324	Fort Dodge	IA	2,533	\$3.00
325	Garner	IA		
326	Hiawatha	IA		\$1.00
327	Iowa City	IA	3,129	\$2.00
328	Marengo	IA		\$1.50
329	Marshalltown	IA		\$2.16

No.	Community	State	ERU	Monthly Fee
330	Mason City	IA		\$1.00
331	Nevada	IA		\$1.50
332	Oskaloosa	IA	2,750	\$2.00
333	Perry	IA	2,700	\$2.00
334	Sac City	IA		\$3.00
335	Sioux City	IA		φο.σσ
336	State Center	IA	Х	\$3.00
337	Storm Lake	IA	2,750	\$2.00
338	Waukee	IA	2,973	\$2.75
339	West Des Moines	IA	4,000	\$2.75
340	Windsor Heights	IA	1,000	\$3.50
341	Coeur D'Alene	ID	3,000	\$4.00
342	Lewiston	ID	4,000	\$4.50
343	Pocatello	ID	·	\$2.44
344	Aurora	IL	Х	\$3.45
345	Bloomington	IL	1,000	\$4.35
346	East Moline	IL	2,200	\$2.33
347	Highland Park	IL	Х	\$4.00
348	Moline	IL		\$3.75
349	Morton	IL	3,300	\$4.74
350	Normal	IL	3,200	\$4.60
351	O'Fallon	IL	3,650	\$3.45
352	Richton Park	IL	Χ	\$5.63
353	Rock Island	IL	2,800	\$3.83
354	Rolling Meadows	IL	3,604	\$2.76
355	Tinley Park	IL	Χ	
356	Albany	IN		\$12.40
357	Anderson	IN	2,500	\$3.50
358	Bargersville	IN		\$9.46
359	Batesville	IN	X	\$2.00
360	Berne	IN		\$10.00
361	Bloomington	IN		\$2.70
362	Brownsburg	IN		\$5.00
363	Cedar Lake	IN	2903	\$5.00
364	Centerville	IN		\$8.50
365	Chandler	IN		\$4.00
366	Chesterton	IN	3,585	\$5.00
367	Cicero	IN		
368	Clarksville	IN	0.000	\$2.95
369	Connersville	IN	2,662	
370	Crawfordsville	IN		#0.00
371	Crown Point	IN	Х	\$6.00
372	Cumberland	IN	4.0.40	\$5.20
373	Dyer	IN	4,343	\$6.00
374	Elkhart County	IN	2,800	\$1.25
375	Fishers	IN	3,318	\$4.95
376	Floyd County	IN		\$3.25

No.	Community	State	ERU	Monthly Fee
377	Fort Wayne	IN	2,500	\$3.65
378	Fortville	IN	_,000	\$8.00
379	Goshen	IN	2,800	\$1.25
380	Greendale	IN	3,000	\$4.39
381	Greenfield	IN	2,250	\$2.00
382	Griffith	IN	X	\$7.50
383	Highland	IN		\$6.43
384	Indianapolis	IN	2,800	\$2.25
385	Jasper	IN	5,000	\$2.00
386	Jeffersonville	IN		\$3.50
387	Lafayette	IN	3,200	\$4.00
388	Lebanon	IN	3,000	\$3.00
389	Logansport	IN		
390	Marion	IN		\$5.00
391	McCordsville	IN	2,250	\$7.50
392	Merrillville	IN	2,784	\$5.00
393	Middletown	IN		\$6.00
394	Muncie	IN	X	\$0.95
395	Munster	IN		\$10.00
396	New Albany	IN	2,500	\$3.17
397	New Castle	IN	Χ	\$6.00
398	New Haven	IN	2,534	
399	North Manchester	IN		
400	Peru	IN	3,497	\$4.00
401	Plainfield	IN		\$4.00
402	Plymouth	IN	12,000	\$2.05
403	Richmond	IN	2,980	\$3.00
404	Shelbyville	IN		\$6.00
405	Valparaiso	IN	Χ	\$7.00
406	Vincennes	IN		
407	Washington	IN	2,558	\$3.00
408	Westfield	IN	Χ	\$2.75
409	Yorktown	IN		\$2.00
410	Andover	KS		
411	Arkansas City	KS		\$3.00
412	Bonner Springs	KS	X	\$2.50
413	Coffeyville	KS	Χ	\$2.50
414	El Dorado	KS	2,314	\$3.00
415	Eudora	KS		
416	Fairway	KS	3,200	\$5.00
417	Hiawatha	KS	Х	\$4.00
418	Lawrence	KS	2,366	\$4.00
419	Lenexa	KS		\$5.00
420	Manhattan	KS		\$1.10
421	Mission	KS	2,485	\$4.00
422	Olathe	KS		\$3.75
423	Overland Park	KS	2,485	\$2.00

No.	Community	State	ERU	Monthly Fee
424	Parsons	KS	X	\$1.00
425	Pittsburg	KS	^	\$2.97
426	Prairie Village	KS	Х	\$9.50
427	Shawnee	KS	^	\$3.00
428	Topeka	KS	2,018	\$3.62
429	Valley Center	KS	X	\$1.00
430	Wichita	KS	2,139	\$2.00
431	Winfield	KS	2,100	\$1.00
432	Danville	KY		\$1.50
433	Henderson	KY	3,000	ψσ
434	Hopkinsville	KY	3,350	\$3.00
435	Lexington/Fayette County	KY	2,500	\$4.32
436	Louisville/Jefferson Co.	KY	2,500	\$5.02
437	Murray	KY	3,000	\$1.50
438	Oldham County	KY	6,000	\$3.43
439	Radcliff	KY	2,800	\$4.00
440	Sanitation District 1	KY	2,600	\$4.02
441	Warren County	KY	Х	\$4.00
442	Chicopee	MA	2,000	\$3.33
443	Fall River	MA		
444	Newton	MA	3,119	\$2.08
445	Reading	MA	2,552	\$3.32
446	Annapolis	MD		\$1.83
447	Charles County	MD	Χ	\$2.00
448	Montgomery County	MD	2,406	\$1.06
449	Rockville	MD	2,330	\$5.15
450	Silver Spring	MD		\$3.93
451	Takoma Park	MD	1,228	\$2.39
452	Augusta	ME	2,700	\$3.44
453	Lewiston	ME	Х	\$3.33
454	Orono	ME		\$3.43
455	Ann Arbor	MI	Χ	\$6.92
456	Berkley	MI	2,600	\$3.35
457	Detroit	MI		
458	Lansing	MI		
459	Marquette	MI		\$4.18
460	Albert Lea	MN		# 0 =0
461	Alexandria	MN		\$2.50
462	Andover	MN		\$2.06
463	Anoka	MN		\$1.76
464	Apple Valley	MN	X	\$4.33
465	Arden Hills	MN	· ·	\$3.20
466	Ashby	MN	X	¢2.50
467	Austin	MN	X	\$2.50 \$2.10
468	Baxter Relle Plaine	MN MN	X	\$2.10
469	Belle Plaine		2 700	\$3.10 \$6.26
470	Bemidji	MN	3,700	\$6.26

No.	Community	State	ERU	Monthly Fee
471	Bird Island	MN	х	\$5.00
472	Blaine	MN	X	\$1.75
473	Bloomington	MN		\$4.53
474	Brainerd	MN	Х	•
475	Brooklyn Center	MN	Х	\$4.78
476	Brooklyn Park	MN	х	\$2.40
477	Buffalo	MN	Х	
478	Burnsville	MN	Х	\$6.28
479	Cambridge	MN		\$3.85
480	Carver	MN	Х	\$3.33
481	Centerville	MN		\$1.67
482	Champlin	MN	Х	\$2.50
483	Chanhassen	MN		\$2.92
484	Circle Pines	MN		\$3.00
485	Columbia Heights	MN	Х	\$2.46
486	Coon Rapids	MN		\$3.30
487	Cottage Grove	MN	Χ	\$4.00
488	Crystal	MN	Χ	\$3.10
489	Deephaven	MN		\$5.00
490	Delano	MN		
491	Duluth	MN	X	\$3.75
492	Eagan	MN		\$2.70
493	Eden Prairie	MN	Х	\$1.00
494	Edina	MN	X	\$4.80
495	Elko-New Market	MN		\$4.50
496	Excelsior	MN	Χ	\$2.66
497	Fairmont	MN	X	
498	Falcon Heights	MN		\$3.25
499	Faribault	MN		
500	Farmington	MN	Χ	\$3.00
501	Fergus Falls	MN	Χ	\$4.00
502	Forest Lake	MN	Χ	\$0.55
503	Frazee	MN		
504	Fridley	MN	X	\$1.12
505	Golden Valley	MN	Χ	\$7.33
506	Grand Rapids	MN	Χ	\$5.35
507	Hastings	MN		\$2.12
508	Hopkins	MN		\$5.00
509	Hutchinson	MN		\$1.75
510	Jordan	MN		\$3.09
511	Kasson	MN		
512	Lake Elmo	MN	Х	\$2.50
513	Lakeville	MN	Х	\$5.25
514	Lauderdale	MN		\$2.50
515	Long Lake	MN		\$3.60
516	Loretto	MN		\$5.50
517	Madison	MN	REF	

No.	Community	State	ERU	Monthly Fee
518	Mahtomedi	MN	X	\$3.51
519	Mankato	MN	X	\$3.00
520	Maple Plain	MN	X	\$2.97
521	Maplewood	MN	^	\$4.12
522	Mayer	MN	Х	\$0.67
523	Medina	MN	X	\$2.02
524	Mendota Heights	MN	X	\$1.67
525	Minneapolis	MN	1,530	\$10.77
526	Minnetonka	MN	1,550	\$5.10
527	Minnetrista	MN	Х	\$3.00
528	Moorhead	MN	X	φ3.00
529	Mora	MN		\$1.25
530	Mound	MN	X	\$2.16
531	Mounds View	MN	X	\$2.75
532	New Brighton	MN	X	\$4.88
533		MN	X	\$4.00 \$6.11
	New Hope	MN	X	
534	New Prague North Saint Paul	MN	X	\$2.64
535	North Saint Paul Northfield	MN	.,	\$5.35
536		MN	X	\$4.75
537	Norwood Young America	MN	.,	\$1.00
538	Oak Park Heights		X	\$1.00
539	Oakdale	MN	X	\$1.67
540	Orono	MN		\$3.43
541	Osakis	MN	X	\$1.00
542	Osseo	MN	X	\$3.00
543	Plymouth Drive Leke	MN	X	\$5.00
544	Prior Lake	MN		\$12.00
545	Ramsey	MN	.,	\$2.60
546	Red Wing	MN	X	\$4.00
547	Richfield	MN	X	\$3.30
548	Robbinsdale	MN	X	\$3.95
549	Rochester	MN		\$3.00
550	Rogers	MN	X	\$3.15
551	Rosemount	MN	X	\$3.94
552	Roseville	MN	X	\$2.05
553	Saint Anthony	MN	X	\$4.33
554 555	Saint Bonifacius Saint Cloud	MN	X	\$5.00 \$3.10
555		MN	X	\$2.10
556 557	Saint Louis Park	MN	X	\$4.83
557	Saint Michael	MN	X	\$2.00
558	Saint Paul	MN		\$4.82
559	Saint Paul Park	MN		\$2.67
560 561	Saint Peter	MN	V	\$7.50
561	Savage	MN	X	\$6.42
562	Shakopee	MN	X	\$2.81
563	Shoreview	MN	X	\$3.63
564	Shorewood	MN	X	\$6.72

No.	Community	State	ERU	Monthly Fee
565	South Saint Paul	MN		\$2.50
566	Stillwater	MN	х	\$1.50
567	Thief River Falls	MN	X	\$2.50
568	Tonka Bay	MN	X	\$1.13
569	Vadnais Heights	MN	X	\$3.00
000	Vadnais Lake Water Management	IVII 4	, , , , , , , , , , , , , , , , , , ,	ψο.σσ
570	Organization	MN	Х	\$2.20
571	Victoria	MN	Х	\$3.33
572	Waconia	MN	Х	\$5.47
573	Watertown	MN	Х	\$1.75
574	Wayzata	MN		\$3.33
575	West Saint Paul	MN	X	\$3.08
576	White Bear Township	MN	Χ	\$2.00
577	Woodbury	MN		\$5.77
578	Worthington	MN		\$3.00
579	Arnold	MO	1,750	\$3.75
580	Columbia - Boone County	MO	Χ	\$1.15
581	Kansas City	MO	3,000	\$3.00
582	Saint Louis	MO		\$0.24
583	Wentzville	MO	2,350	\$1.10
584	Billings	MT		\$2.69
585	Great Falls	MT		\$7.26
586	Helena	MT	10,000	\$1.84
587	Polson	MT	Х	\$4.00
588	Whitefish	MT		
589	Asheville	NC	2,442	\$2.34
590	Bessemer City	NC	X	\$2.07
591	Burlington	NC	Χ	\$2.00
592	Carolina Beach	NC	500	
593	Chapel Hill	NC	2,000	\$6.50
594	Charlotte	NC	2,613	\$8.25
595	Clemmons	NC	3,952	\$3.70
	Concord	NC	3,120	\$4.30
597	Cornelius	NC	2,613	\$4.17
598	Cumberland County	NC	2,266	\$1.00
599	Dallas	NC	X	\$2.08
600	Davidson	NC	2,613	\$2.81
601	Durham	NC	2,400	\$4.50
602	Elizabeth City	NC	X	\$3.00
603	Fayetteville	NC	2,266	\$1.00
604	Forsythe County	NC		
605	Gastonia	NC	2,650	\$2.75
606	Greensboro	NC	2,543	\$2.70
607	Greenville	NC	2,000	\$5.70
608	High Point	NC	2,588	\$2.00
609	Hope Mills	NC	2,266	\$3.00
610	Huntersville	NC	2,613	\$4.03
611	Indian Trail	NC	1,984	\$4.24

No.	Community	State	ERU	Monthly Fee
612	Jacksonville	NC	2,850	\$4.00
613	Kannapolis	NC	3,250	\$4.00
614	Kernersville	NC	2,980	\$3.29
615	Kinston	NC	3,059	\$4.00
616	Lowell	NC	0,000	ψ 1100
617	Lumberton	NC	Х	\$2.50
618	Matthews	NC	2,613	\$4.03
619	Mecklenburg County	NC	2,613	\$4.03
620	Mint Hill	NC	2,613	\$4.03
621	Monroe	NC	2,618	\$4.00
622	Mount Holly	NC	χ	\$2.50
623	Oak Island	NC	х	\$2.50
624	Oxford	NC	2,368	\$2.00
625	Pineville	NC	2,613	\$4.03
626	Raleigh	NC	2,260	\$4.00
627	Rocky Mount	NC	2,519	\$3.75
628	Spring Lake	NC	2,266	\$2.50
629	Stallings	NC		
630	Washington	NC	Х	\$4.00
631	Whitakers	NC	Х	\$3.25
632	Wilmington	NC	2,500	\$5.10
633	Wilson	NC	2,585	\$2.94
634	Winston-Salem	NC	X	\$4.25
635	Winterville	NC	2,000	\$2.00
636	Wrightsville Beach	NC	Х	\$0.00
637	Bismarck	ND		
638	Grand Forks	ND	Х	\$2.90
639	Sante Fe	NM		
640	Carson City	NV	Х	\$3.38
641	Sparks	NV		
642	Ada	OH	Х	\$1.50
643	Amberly	ОН		
644	Ashland	OH	3,052	\$3.50
645	Barberton	ОН	8,668	\$5.00
646	Bellefontaine	ОН	2,400	
647	Broadview Heights	OH	4,000	\$4.00
648	Butler County	ОН	4,000	\$1.08
649	Canal Winchester	OH		\$1.00
650	Celina	OH	3,083	\$2.00
651	Chillicothe	ОН		\$1.00
652	Cincinnati	OH		\$2.70
653	Columbus	OH	2,000	\$3.32
654	Cuyahoga Falls	OH	3,000	\$2.00
655	Dayton	OH	Х	\$4.28
656	Delaware	OH	2,773	\$2.50
657	Forest Park	ОН		\$3.00
658	Gahanna	OH	3,064	\$3.42

No.	Community	State	ERU	Monthly Fee
	Galion	ОН	2,650	\$3.00
	Greenville	OH	2,800	\$2.95
	Hamilton	OH	2,536	\$5.50
	Hamilton County	OH	2,000	φοισσ
	Hudson	OH	Х	\$3.00
	Ironton	OH	3,000	\$14.55
	Kent	OH	1,963	\$2.30
	Lake County	OH	3,050	\$0.80
	Lancaster	OH	2,600	\$5.50
	Lebanon	OH	2,615	\$3.50
	London	OH	2,766	\$4.00
	Loveland	OH	2,500	\$4.50
	Marion	OH	2,778	\$4.16
	Marysville	OH	2,700	\$2.75
	Mason	OH	2,700	\$3.00
	Medina	OH	2,716	\$2.25
	Middletown	OH	2,814	\$3.25
	Milford	OH	2,400	\$5.50
	Monroe	OH	χ	\$3.00
	Montpelier	OH	A	ψ0.00
	Muskingum Watershed Conservancy District	OH	3,300	\$1.00
	Newark	OH	2,600	\$4.50
	Painesville	OH	2,500	\$2.75
	Pickerington	OH	2,530	\$1.50
	Ravenna	OH	2,750	\$3.00
	Reynoldsburg	OH	2,530	\$1.25
	Sheffield	OH	2,500	\$2.50
	Sheffield Lake	OH	2,275	\$4.85
	Sidney	OH	2,752	\$0.83
	Spencerville	ОН	_,	70.00
	Stow	ОН	3,060	\$3.00
	Tallmadge	ОН	0,000	\$2.00
691	Toledo	ОН	2,500	\$3.16
	Trenton	ОН	χ	\$2.60
	Troy	ОН	3,000	\$3.50
	Union	OH	2,300	\$3.00
	Upper Arlington	OH	Х	\$2.75
	Wadsworth	OH		\$4.50
	Warren	ОН	648	\$2.92
	Wooster	OH		\$4.80
	Zanesville	ОН		
	Broken Arrow	OK	2,650	\$3.00
	Choctaw	OK	,	\$3.00
	Edmond	OK	4,860	\$3.00
	Enid	OK	5,000	•
	Lawton	OK	,	\$1.00
	Muskogee	OK		\$2.00

No.	Community	State	ERU	Monthly Fee
706	Oklahoma City	OK		\$4.00
707	Sand Springs	OK		\$2.00
708	Tulsa	OK	2,650	\$4.63
709	Adair Village	OR	2,000	ψ 1100
710	Ashland	OR	3,000	\$3.68
711	Beaverton	OR	2,640	\$6.00
712	Bend	OR	3,800	\$4.00
713	Cannon Beach	OR	5,555	\$3.50
714	Central Point	OR	3,000	\$5.00
715	Clackamas County	OR	0,000	ψ0.00
716	Clatskanie	OR		\$2.50
717	Corvallis	OR	2,750	\$4.98
718	Cottage Grove	OR	_,,,,,,	\$3.20
719	Dundee	OR	2,500	\$5.00
720	Estacada	OR	2,500	\$5.15
721	Eugene	OR	1,000	\$8.03
722	Fairview	OR	2,500	\$6.42
723	Florence	OR	1,000	\$6.00
724	Forest Grove	OR	2,640	\$4.00
725	Forest Park	OR	_,-,- :-	•
726	Gresham	OR	2,500	\$8.60
727	Hillsboro	OR	2,640	\$4.00
728	Hood River	OR	X	\$2.50
729	Hubbard	OR		\$4.25
730	Keizer	OR	3,000	\$2.70
731	Lake Oswego	OR	3,030	\$6.64
732	Medford	OR	3,000	\$4.40
733	Milwaukie	OR	2,706	\$9.15
734	Newberg	OR	2,877	\$3.29
735	Ontario	OR	2,500	\$1.16
736	Oregon City	OR		\$2.00
737	Philomath	OR	Х	\$0.75
738	Portland	OR	2,194	\$16.82
739	Reedsport	OR		
740	Roseburg	OR	Х	\$3.35
741	Saint Helens	OR	2,500	\$4.54
742	Salem	OR		
743	Sandy	OR	2,750	\$3.00
744	Scappoose	OR		
745	Sheridan	OR		\$3.50
746	Springfield	OR		\$8.63
747	Talent	OR		\$1.41
748	Tigard	OR		\$4.00
749	Troutdale	OR		\$3.24
750	Tualatin	OR		\$4.00
751	Washington County	OR		
752	West Linn	OR	2,914	\$3.25

No.	Community	State	ERU	Monthly Fee
753	Wilsonville	OR	2,750	\$4.00
754	Philadelphia	PA	2,700	\$9.12
755	Aiken County	SC	2,500	\$3.22
756	Anderson	SC	x	\$4.00
757	Beaufort	SC	4,906	\$3.70
758	Beaufort County	SC	4,906	\$4.17
759	Bluffton	SC	4,906	\$8.17
760	Charleston	SC	2,200	\$6.00
761	Charleston County	SC		\$3.00
762	Columbia	SC	2,454	\$3.95
763	Conway	SC	2,700	\$5.25
764	Dorchester County	SC	14,520	\$2.43
765	Easley	SC	5,000	\$2.00
766	Florence	SC	2,500	\$3.50
767	Folly Beach	SC		\$3.00
768	Georgetown	SC	Х	\$2.00
769	Georgetown County	SC	3,770	\$4.33
770	Greenville	SC	2,389	\$5.18
771	Greenville County	SC	2,466	
772	Greer	SC	2,500	\$1.80
773	Hartsville	SC		\$4.00
774	Hilton Head Island	SC		\$6.94
775	Horry County	SC	Х	\$2.45
776	Mount Pleasant	SC		\$1.50
777	Myrtle Beach	SC	5,000	\$3.50
778	North Augusta	SC	X	\$4.00
779	North Charleston	SC	Χ	
780	North Myrtle Beach	SC	3,500	\$6.00
781	Port Royal	SC	4,906	\$4.17
782	Rock Hill	SC	X	\$2.40
783	Spartanburg County	SC	Χ	\$4.00
784	Summerville	SC	X	\$3.00
785	Tega Cay	SC		\$8.00
786	Aberdeen	SD	X	
787	Brookings	SD	Х	
788	Sioux Falls	SD		# 4.00
789	Alcoa	TN	.,	\$4.00
790	Callianilla	TN	Х	\$3.00
791	Collierville	TN	1 500	\$2.25 \$1.00
792 793	Dyersburg Franklin	TN TN	1,500 3,350	\$1.00 \$3.65
793	Hamilton County	TN	3,500	\$3.00
794	Johnson City	TN	3,500	\$3.00
795 796	La Vergne	TN	3,315	\$3.00 \$3.50
796	Maryville	TN	2,400	\$3.50 \$3.97
797	Memphis	TN	3,147	\$3.97 \$2.18
799	Millington	TN	3,000	\$2.50
199	willington	IIN	3,000	φ2.50

No.	Community	State	ERU	Monthly Fee
800	Morristown	TN	2,400	\$1.00
801	Murfreesboro	TN	3,470	\$3.25
802	Nashville/Davidson County	TN	χ	\$3.00
803	Signal Mountain	TN	X	\$2.50
804	Smyrna	TN	3,543	Ψ2.00
805	Spring Hill	TN	3,412	\$3.50
806	Tullahoma	TN	0,112	\$0.00
807	Abilene	TX	Х	\$2.45
808	Allen	TX	X	\$2.75
809	Arlington	TX	2,800	\$3.50
810	Austin	TX	χ	\$7.15
811	Azle	TX	1,500	\$3.00
812	Baytown	TX	1,979	\$1.71
813	Bedford	TX	2,727	\$3.50
814	Belton	TX	,	
815	Benbrook	TX	3,186	\$6.50
816	Bexar County	TX	,	\$1.10
817	Bryan	TX		
818	Burkburnett	TX	3,500	\$1.50
819	College Station	TX		
820	Colleyville	TX	Х	\$7.00
821	Colony	TX	3,406	\$2.50
822	Coppell	TX		
823	Corinth	TX	3,900	\$5.00
824	Corpus Christi	TX		
825	Dallas	TX	Х	\$3.65
826	Denton	TX		
827	El Paso	TX	2,000	\$4.75
828	Euless	TX	Х	\$2.50
829	Fairview	TX		\$7.75
830	Flower Mound	TX	X	\$3.90
831	Fort Worth	TX	2,600	\$4.75
832	Frisco	TX	X	\$2.00
833	Gainesville	TX	1,895	\$2.00
834	Garland	TX		\$2.40
835	Georgetown	TX		
836	Grand Prairie	TX		\$2.50
837	Grapevine	TX		
838	Haltom City	TX		\$4.89
839	Highland Village	TX	1,000	\$4.91
840	Houston	TX	2,400	\$2.00
841	Hurst	TX	3,342	\$4.00
842	Irving	TX		\$2.16
843	Keller	TX		
844	Killeen	TX		\$5.00
845	Laredo	TX	X	\$2.25
846	Live Oak	TX	3,007	\$5.50

No.	Community	State	ERU	Monthly Fee
847	Lubbock	TX		\$4.99
848	McKinney	TX	2,343	\$1.00
849	Mesquite	TX	2,010	\$3.00
850	New Braunfels	TX	Х	ψ0.00
851	North Richland Hills	TX	^	
852	Plano	TX		
853	Portland	TX		
854	Richland Hills	TX	Х	\$8.50
855	Rowlett	TX	^	\$2.00
856	Saginaw	TX	Х	\$3.00
857	San Angelo	TX	X	\$4.00
858	San Antonio	TX	X	\$3.22
859	San Marcos	TX		\$3.21
860	Schertz	TX		·
861	Sealy	TX		
862	Southlake	TX		\$8.00
863	Stephenville	TX	6,000	\$3.00
864	Temple	TX		
865	The Colony	TX		
866	Trophy Club	TX		
867	Tyler	TX		
868	Universal City	TX	Х	\$3.08
869	University Park	TX		
870	Watagua	TX		
871	White Settlement	TX	Х	
872	Wichita Falls	TX	3,500	\$1.75
873	Bountiful	UT	3,828	
874	Centerville	UT	3,600	\$4.00
875	Draper	UT	3,000	\$4.00
876	Elk Ridge	UT		\$3.00
877	Farmington	UT	Χ	\$6.00
878	Layton	UT	X	\$4.60
879	Lindon	UT		\$3.75
880	Logan	UT	3,000	\$3.50
881	Midvale	UT	3,000	\$3.25
882	Moab	UT	3,000	
883	Murray	UT		\$3.55
884	Nibley	UT		\$4.00
885	North Logan	UT	4,700	\$4.00
886	North Ogden	UT	4 =05	20.41
887	Ogden	UT	1,500	\$2.14
888	Orem	UT	2,700	\$4.50
889	Payson	UT		\$5.00
890	Provo	UT	0.000	\$4.10
891	Riverdale	UT	2,600	# 0.00
892	Salt Lake City	UT	2,500	\$3.00
893	Sandy	UT	2,816	\$5.00

No.	Community	State	ERU	Monthly Fee
894	Santa Clara	UT	3,500	\$4.51
895	Spanish Fork	UT	3,800	\$3.00
896	Springville	UT	3,500	\$3.96
897	Taylorsville	UT	3,800	\$4.00
898	West Valley	UT	2,830	\$4.00
899	Woods Cross	UT	3,000	ψ 1100
900	Arlington County	VA	2,762	\$2.17
901	Chesapeake	VA	2,112	\$2.55
902	Hampton	VA	2,429	\$3.60
903	James City County	VA	3,235	\$4.90
904	Loudoun County	VA	2,059	\$2.20
905	Newport News	VA	1,777	\$3.10
906	Norfolk	VA	2,000	\$8.08
907	Portsmouth	VA	1,877	\$6.50
908	Prince William County	VA	2,059	\$1.50
909	Richmond	VA	1,425	\$5.83
910	Staunton	VA	2,600	\$3.20
911	Suffolk	VA	3,200	\$3.95
912	Virginia Beach	VA	2,269	\$5.43
913	Burlington	VT	1,000	
914	South Burlington	VT	2,700	\$4.50
915	Aberdeen	WA	X	\$6.08
916	Algona	WA	Х	\$4.75
917	Anacortes	WA	2,000	\$3.00
918	Arlington	WA	6,000	\$3.45
919	Auburn	WA	2,600	\$11.50
920	Battle Ground	WA	3,000	
921	Bellevue	WA		
922	Bellingham	WA	3,000	\$14.00
923	Black Diamond	WA	3,000	\$10.00
924	Blaine	WA		\$4.16
925	Bonney Lake	WA	2,600	\$12.00
926	Bothell	WA	Х	\$6.46
927	Bremerton	WA		\$7.45
928	Brier	WA		\$3.00
929	Buckley	WA	8,000	\$12.61
930	Burlington	WA		\$3.10
931	Camas	WA	3,218	\$4.71
932	Centralia	WA		\$6.00
933	Chehalis	WA	3,000	\$5.47
934	Chelan County	WA	4,600	\$5.50
935	Clark County	WA		\$2.75
936	Des Moines	WA	2,400	\$6.82
937	Douglas County	WA	2,750	\$3.33
938	Duvall	WA	Х	\$16.92
939	East Wenatchee	WA	2,750	\$3.33
940	Edgewood	WA	X	\$3.33

No.	Community	State	ERU	Monthly Fee
941	Edmonds	WA	3,000	\$7.78
942	Ellensburg	WA	3,900	\$5.00
943	Everett	WA	-,,,,,,	\$11.00
944	Federal Way	WA		\$6.59
945	Ferndale	WA	Х	\$4.06
946	Fife	WA	Х	\$2.00
947	Friday Harbor	WA	2,000	\$10.25
948	Gig Harbor	WA	2,000	\$7.20
949	Issaquah	WA	2,000	\$14.08
950	Jefferson County	WA	3,000	
951	Kelso	WA	X	\$3.10
952	Kennewick	WA		
953	Kent	WA	2,500	
954	King County	WA	Χ	\$9.25
955	Kirkland	WA	2,600	\$14.15
956	Kitsap County	WA	4,200	\$4.78
957	Lacey	WA	X	\$6.75
958	La Conner	WA	2,100	\$11.55
959	Liberty Lake	WA	3,160	\$0.51
960	Longview	WA	2,500	\$2.25
961	Lynden	WA		\$6.00
962	Lynnwood	WA	2,900	\$4.25
963	Marysville	WA	3,200	\$8.00
964	Mason County	WA		\$0.00
965	Mercer Island	WA	3,471	\$13.00
966	Mill Creek	WA	3,000	
967	Milton	WA		\$15.50
968	Monroe	WA	2,500	\$9.00
969	Montesano	WA		\$2.00
970	Moses Lake	WA	4,000	\$5.00
971	Mountlake Terrace	WA	2,282	\$5.83
972	Mukilteo	WA	2,500	\$7.85
973	Normandy Park	WA	3,100	\$10.00
974	North Bend	WA	2,920	\$12.36
975	Oak Harbor	WA	2,500	\$7.70
976	Olympia	WA	2,528	\$3.00
977	Orting	WA	2,500	\$9.00
978	Pacific	WA	2,500	\$7.00
979	Pierce County	WA	2,640	\$6.67
980	Port Angeles	WA	4,000	\$6.00
981	Port Orchard	WA		
982	Port Townsend	WA	3,000	\$7.20
983	Pullman	WA	3,500	\$3.00
984	Puyallup	WA	2,800	\$10.24
985	Redmond	WA	2,000	\$16.56
986	Renton	WA	Х	\$5.72
987	Richland	WA	3,000	\$2.60

No.	Community	State	ERU	Monthly Fee
988	San Juan County	WA	X	\$2.19
989	Seattle	WA	X	\$11.34
990	Sedro-Woolley	WA	^	Ψ11.0-
991	Shelton	WA	Х	\$8.50
992	Skagit County	WA	X	\$3.06
993	Snohomish	WA	2,500	\$3.25
994	Snoqualmie	WA	2,600	\$4.00
995	Spokane	WA	2,000	\$1.75
996	Spokane County	WA	3,160	\$1.75
997	Steilacoom	WA	3,100	\$13.75
998	Sultan	WA	4,519	\$5.75
999		WA	4,519	φ5.75
1000	Sunnyside Sumner	WA	2,400	\$2.50
1000	Tacoma	WA	6,000	\$11.59
1001		WA		
	Thurston County		3,600	\$1.67
1003	Toppenish Tukwilla	WA WA	2,000	\$1.00
1004			X 2.050	\$7.08
1005	Tumwater	WA	3,250	\$5.70
1006	University Place	WA	Χ 0.500	\$6.00
1007	Vancouver	WA	2,500	\$4.00
1008	Walla Walla	WA	3,000	\$3.77
1009	Wenatchee	WA	3,000	\$5.50
1010	West Richland	WA		\$2.80
1011	Woodinville	WA	0.000	\$7.09
1012	Yakima	WA	3,600	\$4.17
1013	Yelm	WA	X	\$2.50
1014	Allouez	WI	3,663	\$6.50
1015	Altoona	WI	X	\$3.00
1016	Appleton	WI	2,368	\$9.07
1017	Baraboo	WI	2,379	\$3.91
1018	Barron	WI	10,850	\$2.00
1019	Bayside	WI	5,325	\$8.33
1020	Bellevue	WI	3,221	\$4.00
1021	Beloit	WI	3,347	\$2.00
1022	Brookfield (Town of, not City of)	WI		
1023	Brown Deer	WI	3,257	\$7.65
1024	Butler	WI	3,032	\$5.50
1025	Cambridge	WI		\$2.33
1026	Chetek	WI		\$2.25
1027	Chippewa Falls	WI		\$3.00
1028	Cudahy	WI	2,700	\$4.00
1029	De Forest	WI	2,900	\$5.00
1030	Delafield	WI		\$2.42
1031	Denmark	WI		\$4.00
1032	De Pere	WI	3,861	\$3.92
1033	Eau Claire	WI	3,000	\$5.17
1034	Elm Grove	WI	6,235	\$5.46

No.	Community	State	ERU	Monthly Fee
1035	Fitchburg	WI	3,700	\$4.35
1036	Fort Atkinson	WI	3,096	\$2.33
1037	Fox Point	WI	2,988	\$10.56
1038	Franklin	WI	2,964	\$3.00
1039	Garner's Creek	WI	3,623	\$8.00
1040	Glendale	WI	2,609	\$3.50
1041	Grand Chute	WI	3,283	\$8.00
1042	Grantsburg	WI	0,200	\$1.50
1043	Green Bay	WI	3,000	\$4.60
1044	Greendale	WI	3,941	\$6.50
1045	Greenfield	WI	3,630	\$4.15
1046	Greenville	WI	4,510	\$5.00
1047	Hales Corners	WI	1,010	\$0.75
1048	Harrison	WI		\$8.00
1049	Hobart	WI	4,000	\$6.00
1050	Holmen	WI	3,550	\$4.08
1051	Howard	WI	3,301	\$3.67
1052	Janesville	WI	3,200	\$2.28
1053	Jefferson	WI	3,220	\$3.33
1054	Kaukauna	WI	2,944	\$2.08
1055	Kenosha	WI	2,477	\$5.00
1056	Kimberly	WI	3,350	\$9.17
1057	Lake Delton	WI	1,685	\$1.50
1058	Lancaster	WI	3,400	\$2.00
1059	Lisbon	WI	6,642	\$3.33
1060	Little Chute	WI	2,752	\$8.00
1061	Madison	WI	Χ	\$4.58
1062	Manitowoc	WI	3,167	\$6.00
1063	Marshfield	WI		\$5.50
1064	McFarland	WI	3,456	\$3.90
1065	Menasha	WI	4,177	\$5.42
1066	Menomonie	WI	3,000	\$2.67
1067	Milton	WI	4,081	\$4.59
1068	Milwaukee	WI	1,610	\$6.85
1069	Monona	WI	Х	\$5.00
1070	Monroe	WI	2,728	\$5.00
1071	Mukwonago	WI	3,000	
1072	Neenah	WI	3,138	\$4.67
1073	New Berlin	WI	4,000	\$5.00
1074	New Glarus	WI	3,000	\$4.85
1075	New Richmond	WI	12,632	\$2.39
1076	North Fond du Lac	WI	3,123	\$4.67
1077	Oak Creek	WI	2,964	\$3.00
1078	Onalaska	WI	X	\$4.25
1079	Oshkosh	WI	2,817	\$4.07
1080	Palmyra	WI		\$9.39
1081	Pleasant Prairie	WI		\$1.25

No.	Community	State	ERU	Monthly Fee
1082	Poynette	WI	3,550	\$4.17
1083	Racine	WI	2,844	\$6.00
1084	Raymond	WI		
1085	Reedsburg	WI	3,024	\$3.83
1086	River Falls	WI	Х	\$3.14
1087	Saint Francis	WI	2,500	\$4.00
1088	Salem	WI	6,352	\$5.00
1089	Sheboygan	WI	2,215	\$3.00
1090	Shorewood Hills	WI	2,941	
1091	Silver Lake	WI	3,870	
1092	Slinger	WI	4,300	\$3.33
1093	South Milwaukee	WI	2,964	\$3.00
1094	Sun Prairie	WI	3,468	\$5.00
1095	Superior	WI	1,907	\$5.90
1096	Sussex	WI	3,897	\$5.00
1097	Vernon	WI	6,904	\$2.67
1098	Washburn	WI		\$4.00
1099	Watertown	WI	2,900	\$6.33
1100	Waupun	WI	3,204	\$3.00
1101	Wauwatosa	WI	2,174	\$4.62
1102	West Allis	WI	1,827	\$5.26
1103	West Milwaukee	WI	1,956	\$2.00
1104	West Salem	WI	2,400	
1105	Weston	WI	3,338	\$3.98
1106	Whitewater	WI	3,850	\$3.33
1107	Wind Point	WI	3,857	
1108	Wisconsin Rapids	WI	2,620	\$2.33
1109	Beckley	WV	х	\$3.75
1110	Fairmont	WV	2,500	\$5.50
1111	Morgantown	WV	1,000	\$5.30
1112	Oak Hill	WV		\$2.50