Western Kentucky University Stormwater Utility Survey 2019

C. Warren Campbell

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Western Kentucky University
Stormwater Utility Survey
2019

C. Warren Campbell

WKU
School of Engineering & Applied Sciences
Cover

The cover flood picture shows Frank Lloyd Wright’s iconic Falling Water house named in a survey of American Institute of Architects members as the “best all-time work of American architecture.” The house is not insurable under the National Flood Insurance Program because it is built over water.
Preface to the 2019 Survey

This is a very exciting year for stormwater utilities. First, New London formed the first stormwater utility in Connecticut. Secondly, New Jersey passed a state law that allows communities to form stormwater utilities in the state. To my knowledge, none have formed yet, but they are progressing. Third, communities in Rhode Island are exploring the possibility of enacting stormwater utilities. Finally, Anchorage, Alaska has contracted for a SWU feasibility study. Their popularity is growing.

I am always surprised by how worked up people get regarding stormwater fees. When I was the City Hydrologist for Huntsville, Alabama we formed a Flood Mitigation Committee to look at ways of protecting Huntsville people and properties from flooding. After a 10-month long process of education for Committee members, we decided that the best and fairest option was a stormwater utility. The Committee voted unanimously to propose that to the City Council. Our very supportive mayor said we needed to set up a meeting with the Huntsville Times Editorial Board. We did this and presented our case. To their credit, they backed us all the way. They wrote an editorial laying out the idea and backing it fully. I always say that the reaction by a small group of people could not have been stronger than if we had proposed to kill the first-born child of every family in Huntsville. At the public meeting these ill-informed people ranted and raved. They deluged the mayor’s and Council member’s offices with phone calls, emails, and letters. For residential customers we were planning on asking for less than the cost of a glass of wine at a restaurant each month. About 200 committed people controlled the destiny of 170,000 Huntsville residents. After the public meeting the Flood Mitigation Committee Chair wisely asked the committee to vote again on the proposal to develop a stormwater utility for Huntsville. Again, the vote was unanimous in support of a stormwater utility. This was quite a political science lesson for me. You can always educate a few, reasonable, well-informed people of the need for adequate stormwater funding. However, informing the general population is much more difficult. Once the few who shoot from the hip without thinking hit the editorial pages and the television stations freely expressing their opinions, community opinion becomes fixed and it is an uphill battle to change it. If I had it to do over again, I would not have mentioned the fee before a yearlong public education campaign. I would approach those who had experienced floods and ask them to support the idea with letters and emails to the Council and mayor. Going to the Editorial Board seemed like a really good idea at the time, but it was premature. The purpose of this survey has always been to provide information for public education campaigns for those communities who need adequate funding for stormwater programs. I hope it fulfills that purpose.

Warren Campbell
Bowling Green, Kentucky
June 4, 2019
Methods

The main goal of this survey is 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, Sterling, LexisNexis, and others. We searched through many city web sites trying to find utilities. We have also had many people contact me to update fees and identify new utilities. However, the data primarily comes from Internet sources and is prone to errors. Some community websites are not very clear on whether the fee given is monthly, bi-monthly, quarterly, or annually. In cases like that I made the best guess I could. We hope the readers of this document will continue to help us correct mistakes. However, it is difficult to keep up with fee changes in more than 1700 utilities, so if you discover errors in our data please contact me at warren.campbellwku.edu.

Disclaimer

The opinions expressed in this document are those of the author. They are not official opinions of Western Kentucky University, its administration, or of any other individuals associated in any way with WKU. 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 of any organization associated with the University.
ACKNOWLEDGEMENTS

This year I am seriously indebted to Jerry Bradshaw of SCI Consulting Group in Fairfield, California who provided many citations for stormwater utilities not previously in my database. Thank you, Jerry.

I am also indebted to the Wisconsin chapter of the American Public Works Association for their excellent survey of Wisconsin SWUs (Wisconsin APWA [2019]). Their 2019 survey came out just days before mine.

I want to thank Mike Gregory of Computational Hydraulics International for his updates on Canadian stormwater utilities. Also, the University of North Carolina Environmental Finance Center has identified several SWUs that I have included in this survey.

Black and Veatch (2018) publishes an excellent stormwater utility survey with more detailed information about the SWUs in their survey. In 2018 seventy-five SWUs responded to their survey. It is a very worthwhile survey and should be read by anyone interested in stormwater utilities.

The author is grateful to Professor Randel Dymond and his graduate students Kandace Kea and Amanda Dritschel at Virginia Tech for work they did on past surveys and the database.

Since 2007, many of the SWUs in this survey were identified by our undergraduate students who are listed below. I am very proud of the fact that 59 of my students have passed the Certified Floodplain Manager (CFM) exam. When I came to Kentucky in 2004, I was the 7th CFM in the state. There are 11 states with fewer than 59 CFMs so we are making a contribution to floodplain management. Students contributing to the 2014 and 2016 surveys were:

- Kain Kotoucek, CFM
- Cory Smith, CFM
- Megan Jones, CFM

Students contributing to the 2013 Survey were:

- Jordon Begley
- Walker Bruns
- Clayton Cook
- Aaron Dockery
- Gabriel Goncalves de Godoy
- Chris Heil
- Eathan Johnson
- Carson Joyce
- Zach Neihof
- Ashley Penrod
- Tyler Sweetland
- Kirk Thomas
- Dylan Ward
- Rory Watson, CFM
- Doug Woodson, CFM

Students participating in the 2012 survey were:
Western Kentucky University Stormwater Utility Survey 2019

Benjamin Bell, CFM
Jeremy Brown, CFM
Will Spaulding, CFM
Justin Wallace, CFM

Contributors from previous years were:

Daniel Douglas
Allison Gee
Emily Kinslow, CFM
Lacie Lawson
Kendall McClenny, CFM
Kory McDonald
Daniel Skees, CFM
Brian Vincent, CFM
Jason Walker
Russ Whatley, CFM
Alex Krumenacher, CFM
Nick Lawhon, CFM
Austin Shields, CFM
Adam Disselkamp, CFM
Kenneth Marshall
Wesley Poynter, CFM
Tyler Williams, CFM
Brittany Griggs
Lisa Heartsill, CFM
Spenser Noffsinger, CFM
Pat Stevens
Tony Stylianides, CFM
Scott Wolfe, CFM
Darren Back, CFM
Robert Dillingham, CFM
James Edmunds
Scott Embry, CFM
Clint Ervin
Catie Gay Stevens, CFM
Sean O’Bryan, CFM
Casey Pedigo
Broc Porter
Kelly Stolt, CFM
Ben Webster, CFM
Jon Allen
Karla Andrew, CFM
Eric Broomfield, CFM
Kevin Collignon, CFM
Heath Crawford, 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.

I also wish to thank the Environmental Finance Center of the University of North Carolina which provided data on several North Carolina and Georgia stormwater utilities (Environmental Finance Center, 2013).

Several companies publish municipal and county codes which serve as a source for much of our data. We are particularly indebted to the Municipal Code Corporation, American Legal Publishing Corporation, LexisNexis, and Sterling Codifiers, Inc.
Introduction

We have been able to identify 1716 U.S. stormwater utilities that have formed nationwide and 29 in Canada. There are now 6 states with 100 or more stormwater utilities (SWUs). Forty states and DC have at least one SWU. Figure 1 shows U.S. stormwater utilities by location.

As Figure 2 shows, one of the very disappointing aspects of the SWU map is that Louisiana and Mississippi have missed a golden opportunity to encourage stormwater utilities. Twelve years after Hurricane Katrina, neither of the hardest hit states has formed a SWU as far as we can tell. However, New Orleans is considering a stormwater utility to maintain their extensive flood protection systems. Also, until recently neither of the two states hardest hit by Hurricane Sandy (NJ and CT) had a stormwater utility. Now Connecticut has its first (New London) and New Jersey has passed a state law allowing stormwater utilities to form in the state. Anchorage, Alaska has let a contract to develop a stormwater utility. If these come to fruition, we will have more states with SWUs.

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 2010 census population of 88 (no, this is not a misprint). The largest community is Los Angeles with a population exceeding 3,000,000. The average SWU community population is about 68500 and the median is 18,493. No community is too small nor too large to have a stormwater utility.

At some point, this survey will become unnecessary as every community will have some appropriate stormwater funding mechanism. When will this occur? We have identified 1681 SWUs in the U.S. and 29 in Canada, and as this is written 22,389 communities participate in the National Flood Insurance Program (NFIP) (FEMA’s Community Status Book: https://www.fema.gov/cis/nation.pdf). This survey will be necessary for some years to come.

The Data

Part of our raw data is contained in the Table in Appendix A. As this is written, our survey contains data on 1716 stormwater utilities (SWUs) located in 40 states and the District of Columbia (Figure 1). Based on our current find rate, my best guess would be that there are more than 2000 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 number of stormwater utilities by state. It also emphasizes that SWU formation is not governed by politics. Red states supported the Republican candidate in the 2016 presidential election and blue states the Democratic candidate. At least 6 states have more than 100 SWUs. Democratic leaning Washington and Minnesota have more than 100 SWUs while conservative leaning Texas, Ohio, and Florida also have more than 100.

Nationwide, the average monthly single-family residential fee was $5.85, the standard deviation was $4.50, and the median fee was $4.75. 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. However, several communities have reduced their fees. The quartile fees are: 25% - $3.00, 50% - $4.75, and 75% - $7.15 for an interquartile range of $4.15.
Fees ranged from zero up to $45 per month. Figure 3 shows the spatial distribution of monthly fees. As has been observed in previous surveys, no state has all high fees. Even states with the higher fees also have utilities with much lower fees. The range of fee amounts probably reflects stormwater needs and local political realities.

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

The most widely used method of funding is the ERU system. An Equivalent Residential Unit is usually the average impervious area on a single-family residential parcel, although some communities define it as the average of all residential parcels. Fees for non-residential properties are proportional to the ratio of the parcel impervious area to the ERU. For the ERUs identified in our survey, the median was 2902 square feet impervious with a standard deviation of 8757 square feet. We were able to find ERUs for 800 utilities (Figure 4). It is important to have a good estimate of the ERU because an inaccurate ERU means that someone is paying a disproportionate amount which could increase legal exposure (Campbell [2010]). The second and third most popular fee systems were the tier fee (245 SWUs) and the flat fee (236 SWUs) systems. Next in popularity was the Residential Equivalent Factor (REF) system with 140 identified. We were able to identify 110 Dual Fee systems.
Figure 2. Number of stormwater utilities by state
Figure 3. Spatial distribution of monthly stormwater fees

Figure 4 is another interesting way to look at the data. Figure 2 shows that the number of fees is not related to political leanings. Comparing Figure 4 to Figure 2, we see that the highest fee is in Washington state, a Democrat leaning state. However, the second highest fee is Nevada, a Republican leaning state. In the Figure, states showing a median monthly fee of zero are states without identified stormwater utilities.
Figure 4. Median Monthly Fees by State
Canadian Stormwater Utilities

Mike Gregory found 29 Canadian communities with stormwater utilities. From Figure 5, there appears to be some cross-border communication especially in British Columbia/Washington and in Ontario/Michigan/Ohio/Indiana. Of the 29 SWUs he was able to find 7 that used an ERU fee system. In Canada the most popular system is the tier system and he was able to identify 11 of those. We received no additional information on Canadian SWUs in 2019, so the graph is the same as last year.

![Map of Canadian Stormwater Utilities 2018](image)

Figure 5. Canadian communities with stormwater utilities.

Summary

This was a very exciting year for stormwater utilities. Connecticut got its first, New London. New Jersey signed into law clear statutory authority to create stormwater utilities and several New Jersey communities are looking into developing them. Stormwater utilities continue to develop in Pennsylvania and now there are at least 27. About one decade ago, Philadelphia formed the first in the state. New Orleans and Anchorage, Alaska are considering them which raises the possibility that two more states will have SWUs. Once the ice is broken, more will likely form. Stormwater utilities make sense because they can be made fair and provide consistent funding for stormwater programs. While political and legal opposition have forced some SWUs to shut down, the trend is for more and more to form.
It is not clear why stormwater utilities form quickly in some states like Pennsylvania and very slowly in others. It has nothing to do with political leanings in a state as indicated in Figure 2. The only clear obstacle is lack of clear state law allowing them to form, or state law like California’s Prop 218 aimed at discouraging them.

Stormwater utilities continue to be challenged in court. Usually, but not always, the utilities win. They can be set up with fee systems that are fair with a clear nexus between services rendered and fee. These have minimum legal exposure. They can also be set up in a way that increases legal exposure.

The best SWU ordinances have teeth. These allow the SWU community to turn off water and/or power for customers who refuse to pay. The worst ones only allow the utility to take non-paying customers to court. In these cases the community may have to wait years until unpaid fees accumulate so that taking the non-payers to court makes sense. Contrast this to the experience of Garden City, Georgia. A Georgia attorney general wrote an opinion that state agencies were not required to pay stormwater fees. The state Department of Agriculture wrote the Garden City utility that in accordance with the attorney general’s opinion they would not be paying their stormwater fee. The utility wrote back that in accordance with their ordinance they would be turning off water and power for the Department of Agriculture. The Department reconsidered their decision.
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Wisconsin APWA Chapter (2010). “WI Stormwater User Charge Information,”
Appendix A. Raw Data Tables

The following data tables provide the information collected on 1639 U.S. stormwater utilities and 22 Canadian ones. Note that ERUs in the Canadian SWUs are in square meters impervious. The key for the fee types is given below.

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
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<tr>
<td>IA</td>
<td>Impervious Area</td>
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<tr>
<td>E</td>
<td>ERU</td>
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<tr>
<td>F</td>
<td>Fixed Rate</td>
</tr>
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<td>T</td>
<td>Tier System</td>
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<td>R</td>
<td>Residential Equivalence Factor (or similar)</td>
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<td>D</td>
<td>Two Level System (Residential/Commercial)</td>
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<td>No information</td>
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<td>Fee per Parcel Square Footage</td>
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<td>A</td>
<td>Fee per Parcel Acre</td>
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<td>-</td>
<td>Repealed</td>
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<td>M</td>
<td>Water Meter</td>
</tr>
<tr>
<td>W</td>
<td>By Water Usage</td>
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<td>V</td>
<td>Existence of SWU/ Fee verified</td>
</tr>
<tr>
<td>AV</td>
<td>Ad valorem fee</td>
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<tr>
<td>LU</td>
<td>Land use based fee</td>
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Table A-1. U.S. Stormwater Utility Database

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Table A2. Canadian Stormwater Utilities (Data in this table provided by Mike Gregory, M.Sc., P.Eng., P.E.)

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