





MEMORANDUM

TO: James McKay, Michael Guzinski

FROM: Betsy Frederick

DATE: January 17, 2018

SUBJECT: Reference Material - Stormwater Utility Policy Discussion

CC: Andrew Goldberg, Jean Haggerty

Based on our meeting of 12/20/17, we have prepared the enclosed material for use and consideration by the Board of Selectman as we proceed through the Stormwater Utility implementation tasks over the next several months. This information addresses the primary issues discussed at our meeting, specifically:

- Definition of terms to ensure consistent use and clarity (especially with respect to impervious area definition and understanding of credits vs. abatements)
- Manner in which the Town will bill themselves for municipally-owned parcels
- Basis of billing whole units or rounding

We also discussed setting dates for the planned working group sessions on other important policy issues such as rate setting period, the Board of Selectmen as appeals board, and credit policy development. We would like to get those dates and times on people's calendars as soon as possible and request feedback from you regarding preferred dates.

Glossary of Key Terms

Abatement means any reduction in a Stormwater Utility fee on the basis of incorrect calculation of fee for a specific parcel, or other billing error. It is distinctly different than a *credit* (defined below).

Appeal Procedure means the procedure described in detail in the Millis Stormwater Utility Management By-Law Section 11.0 – Appeals and Hearings relating to appeals for either credit or abatement of a Stormwater Utility fee.

Credit means a reduction in the amount of a Stormwater Utility fee charged to the owner of a particular property where that property owner owns, maintains and operates on-site or off-site stormwater management systems or facilities, or provides services or activities that reduce or mitigate the Town's cost of providing stormwater management services, in accordance with the Town's approved credit policy.

Developable shall mean a parcel of land, as designated by the Assessor, which can be altered from its natural state to include impervious surface area.







Developed means property altered from its natural state by construction or installation of greater than or equal to two hundred (200) square feet of impervious surfaces.

Drainage system shall mean natural and manmade channels, swales, ditches, swamps, rivers, streams, creeks, wetlands, branches, reservoirs, ponds, drainage ways, inlets, catch basins, gutters, pipes, culverts, bridges, head walls, storm sewers, lakes, and other physical works, properties, and improvements that transfer, control, convey or otherwise influence the movement of stormwater runoff.

Enterprise Fund is a separate account for the fees and for utility operation, as allowed by MGL Chapter 44, Section 54F ½.

General Laws means the General Laws of the Commonwealth of Massachusetts.

Impervious surface includes any material or structure on or above the ground that prevents water infiltrating the underlying soil. Impervious surfaces include, without limitation, roads, paved parking lots, rooftops, buildings or structures, sidewalks, driveways, and other surfaces which prevent or impede the natural infiltration of stormwater runoff which existed prior to development.

Stormwater is surface water that results from precipitation and that travels over natural or developed land surfaces to discharge into a drainage system or surface water body. Stormwater includes stormwater runoff, snow melt runoff, and surface water runoff and drainage.

Stormwater Commissioners are the Board of Selectmen, who shall have the power to make all policy decisions related to public works matters within the Town and shall be authorized to act as Stormwater Commissioners. The Board of Selectmen shall have the responsibility for carrying out all public works functions and will have the authority to serve as the board of appeals on matters related to the stormwater utility.

Stormwater management services mean all services provided by the Town which relate to the:

- (a) Transfer, control, conveyance or movement of stormwater runoff through the Town;
- (b) Maintenance, repair and replacement of stormwater management systems and facilities owned, controlled, or maintained by the Town;
- (c) Planning, development, design and construction of additional stormwater management systems and facilities to meet current and anticipated needs;
- (d) Regulation, oversight, and enforcement of the use of stormwater management services, systems and facilities;
- (e) Compliance with applicable State and Federal stormwater management regulations and permit requirements including, but not limited to, public education and outreach. Stormwater management services may address the quality of stormwater runoff as well as the quantity thereof.

Stormwater management systems and facilities mean those natural and manmade channels, swales, ditches, rivers, streams, creeks, branches, reservoirs, ponds, drainage ways, inlets, catch basins, pipes, headwalls, storm sewers, outfalls and other physical works, properties and improvements which transfer, control, convey, detain, retain, treat or otherwise influence the movement of stormwater runoff.

Stormwater Utility fee means the periodic user fee imposed pursuant to this by-law by the Town of Millis which will be dedicated to the provision of public stormwater management services.







Undevelopable land is all land including crops, forest land, pasture, conservation or recreation as designated by the Assessor.

Undeveloped land shall mean all land that is not altered from its natural state to an extent that results in greater than two hundred (200) square feet of impervious surface area.

MILLIS Policy Considerations Related to Data Analysis and Preliminary Fee Calculation.

Several policy decisions related to implementation of the Stormwater Management Utility are required prior to finalizing the fee and preparing the billing files. These issues impact the development of the billing data and calculation of fees:

- 1. Specifying land use that will be included as part of the impervious surface capture.
- 2. Deciding whether properties will be billed per 1,000 SF using whole billing units (1 billing unit (BU) would be 200 SF to 999 SF, 2 BUs would be 1000 to 1999) or whether the BUs will be naturally rounded (1 BU = 200 to 1499, 2 BU = 1500 to 2499 ...)
- 3. Separating charges by town parcel or department or calculating one consolidated Town fee
- **1. Impervious Surface Capture** To implement the stormwater fee consistently across the community, it is important to clearly define surfaces which will be considered impervious for the purpose of calculating total impervious area per property. In addition to the "impervious surface" definition included above, the *Millis Stormwater Management Utility By-Law*, presented and approved at Town Meeting, Fall 2017, includes the following definition:
 - Section 5.0 (c): *Impervious area per parcel* is determined by the Town of Millis by utilizing available GIS data layers to calculate the <u>area of building footprints, building structures, driveways, pathways, pools, sports courts, and parking areas.</u> Any impervious areas within the town-owned right-of-way will not be attributed to the parcel and will not be considered as part of the total impervious area of the parcel.

Current Impervious Area Information:

Impervious area (IA) for preliminary calculation purposes was obtained from MassGIS layers that were last updated in 2011. In the examples that follow, the orange is IA from a computer generated "raster" program from 2005 and the blue is from the "structure" IA layer from 2011.







Captures pool deck, but not water surface.



Captures what appears to be crushed gravel or packed dirt driveway.



Captures compacted dirt on baseball field.









Recommendations for IA Capture. To further refine the capture of IA as the data is updated for billing purposes, a clarification of the land uses considered impervious is required. Based on the impervious layers currently available and on the language in the Town's approved by-law, it is recommended that the following features be considered impervious:

- Pool decks, patios, and pool water surface
- Crushed gravel or compacted dirt driveways and parking areas

It is also recommended that dirt playing fields or other non-compacted dirt or gravel (gardens, decorative stone, stockpiles of dirt or gravel) be considered pervious.

For reference, below are several sample definitions of impervious surface definitions used by other communities:

Milton, MA Stormwater Utility Regulations (2016)

Impervious Surface(s): Areas which prevent or impede the infiltration of Stormwater into the soil in the manner in which it entered the soil, in natural conditions, prior to development. Common impervious surfaces include, but are not limited to, rooftops, buildings or structures, sidewalks, walkways, patio areas, driveways, parking lots, storage areas, swimming pools, hockey rinks, decks, compacted gravel and soil surfaces not specifically engineered and maintained to be impervious, awnings and other fabric or plastic coverings, and other surfaces which prevent or impede the natural infiltration of stormwater runoff which existed prior to development.

Northampton, MA Stormwater and Flood control Utility (2014)

Impervious Surface: Those areas which prevent or impede the infiltration of stormwater into the soil in the manner in which it entered the soil, in natural conditions, prior to development. Common impervious surfaces include, but are not limited to, rooftops, buildings or structures, sidewalks, walkways, patio areas, decks, driveways, parking lots, storage areas, compacted gravel and soil surfaces, awnings and other fabric or plastic coverings, and other surfaces which prevent or impede the natural infiltration of stormwater runoff which existed prior to development.

 <u>Maryland State Wildlife Action Plan Glossary of Terms</u> (2016), Maryland Department of Natural Resources

Impervious Surface: An area covered with solid material or that is compacted to the point where water cannot infiltrate underlying soils (e.g. parking lots, roads, houses, patios, swimming pools, tennis courts, etc.). Stormwater runoff velocity and volume can increase in areas covered by impervious surfaces.

DC Water Stormwater FAQ

An impervious surface is a man-made surface that cannot be easily penetrated by water, such as rooftops, driveways, patios, tennis courts, swimming pools, parking lots, and other paved or covered areas (regardless of materials used).







- **2.** Billing in whole 1000 SF units or natural rounding The *Millis Stormwater Management Utility By-Law* states in *Section 5.0 (b):* the *billing rate structure* shall consist of a uniform flat rate based on billing units of 1,000 square feet of impervious area on a developed parcel. There are two common ways of setting the ranges for each billing unit.
 - Bill in whole 1000 SF increments. In this case, for Millis, parcels with 200 SF to 999 SF of impervious area would be billed for one unit, 1000 SF to 1999 would be 2 units, etc.
 - Round IA to nearest 1000 SF. In this case, 200 SF to 1499 would be 1 billing unit, 1500 to 2499 would be 2 units, etc.

The main difference is that properties on the lower end of the IA calculation (1000 to 1499) pay slightly less with rounding and due to rounding down in many situations, the total number of billing units would be reduced by about 5-6%. With less billing units, the annual fee would increase by this same percentage to generate targeted revenue.

Recommendations for Billing: It is recommended that IA be billed in whole 1000 SF increments, keeping the rate per billing unit as low as possible.

3. Billing of Town properties - Currently we have a list of 181 parcels owned by the Town from the Assessor's office and impervious area for each property estimated from the 2011 MassGIS data. The Town tax information does not specify the use of most of the properties, so for now we have estimated the total impervious area for the Town at 1,254,213 SF. The table below summarizes the impervious information and the billing units per parcel. Total billing units are estimated at 1,285. It has been presumed to this point that the Town would get one combined bill, but if the Town wants to group parcels by department or other function, and bill different accounts, then additional information is needed from the Town on these parcels.







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own of Millis	0005-0017-0000	63720	1		NSFR	523		
own of Millis	0009-0018-0000	327974		ORCHARD ST	NSFR	1124	2	
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own of Millis	0011-0026-0001	1497142		EXCHANGE ST	NSFR	935		
wn of Millis	0011-0040-0000	8898		ORCHARD ST	NSFR	6		
wn of Millis	0011-0042-0000	240700		ORCHARD ST	NSFR	551	1	
wn of Millis	0011-0046-0000	86360	1		NSFR	0	0	
wn of Millis	0011-0047-0000	139388	1	MIDDLESEXST	NSFR	0	0	
wn of Millis	0014-0007-0000	500291	1	CAUSEWAY ST	NSFR	0	0	
wn of Millis	0014-0011-0000	763919	1	CAUSEWAY ST	NSFR	0	0	
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wn of Millis	0014-0031-0000	671275	1	CAUSEWAY ST TRACT 949	NSFR	200	1	
wn of Millis	0014-0040-0000	2478360	1	CAUSEWAY ST TRACT 818E	NSFR	0	0	
wn of Millis	0014-0042-0000	383548	1	CAUSEWAY ST TRACT 838E	NSFR	0	0	
wn of Millis	0014-0046-0000	101748		PINE VALLEY RD	NSFR	0		
wn of Millis - Park/Rec	0016-0004-0000	4714439		410 EXCHANGE ST	NSFR	62834	63	
wn of Millis	0016-0116-0000	39371	1	48 ISLAND RD	NSFR	25	0	
wn of Millis	0016-0117-0000	42103		EXCHANGE ST	NSFR	0		
wn of Millis	0017-0006-0000	517998		176 ISLAND RD	NSFR	29		
wn of Millis - Housing Auth	0019-0021-0000	133677		411 UNION & EXCHANGE ST	NSFR	62588		
wn of Millis	0019-0068-0000	109538		VAN KLEECK RD	NSFR	1407	2	
wn of Millis	0019-0116-0000	33363		VAN KLEECK RD	NSFR	0		
wn of Millis	0019-0137-0000	3256		IRVING ST	NSFR	12		
wn of Millis	0019-0155-0000	6041		DANIELS ST	NSFR	0		
wn of Millis	0019-0196-0000	5995		UNION ST	NSFR	195		
wn of Millis	0020-0043-0000	566186		CURVE ST	NSFR	8820		
wn of Millis	0021-0012-0000	54404		CEDAR ST	NSFR	717		
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wn of Millis	0023-0069-0000	22180		885 MAIN ST	NSFR NSFR	17036		
vn of Millis	0023-0000-0000	3804		4 EXCHANGE ST	NSFR	3621	4	
vn of Millis - Library	0023-0072-0000	117987		961 MAIN ST	NSFR	40977	41	
wn of Millis - Police Station	0023-0079-0000	49402		1003 MAIN ST	NSFR	26114		
wn of Millis - Town Hall	0023-0116-0000	124602		900 MAIN ST	NSFR	81549		
wn of Millis- Clyde School	0023-0118-0000	144877		952 MAIN ST	NSFR	103415		likely to change
vn of Millis	0023-0119-0000	89115		972R MAIN ST	NSFR	1943	2	intery to origing
vn of Millis	0024-0004-0000	5241		MEMORIAL PARK	NSFR	1560	2	
n of Millis	0026-0014-0000	7171		DOVER RD	NSFR	1743		
n of Millis	0026-0015-0000	180811		MAIN ST	NSFR	130		
vn of Millis	0027-0055-0000	8525		MEADOW CARTWAY	NSFR	2848		
vn of Millis	0028-0046-0000	636894	1	VILLAGE ST	NSFR	33325	34	
wn of Millis	0029-0011-0000	141802	1	PLAIN ST	NSFR	6851	7	
wn of Millis	0029-0101-0000	15402	1	BOW ST	NSFR	0	0	
wn of Millis	0030-0017-0000	52031	1	SPRING ST	NSFR	0	0	
wn of Millis	0030-0018-0000	94671	1	SPRING ST	NSFR	17869	18	
vn of Millis	0030-0019-0000	63284	1	MAIN ST	NSFR	19802	20	
wn of Millis - Recreation	0030-0020-0000	628437		MAIN & SPRING ST	NSFR	105834	106	
wn of Millis -Middle/High School	0030-0021-0000	574783		245 PLAIN ST	NSFR	230319		likely to change
wn of Millis	0030-0022-0000	30817		SPRING ST	NSFR	59		
wn of Millis	0030-0028-0000	157322		PLEASANT ST	NSFR	0		-
wn of Millis	0030-0053-0000	502742		SPRING ST	NSFR	40074		
wn of Millis	0031-0006-0000	190724		FARM & ACORN ST	NSFR	481	1	-
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wn of Millis	0034-0027-0000	2391	1		NSFR	0		
wn of Millis	0034-0029-0000	7156	1		NSFR	0		
wn of Millis	0034-0033-0000	5981	1		NSFR	545		
vn of Millis	0034-0038-0000	4657		SPENCER ST	NSFR	0		
vn of Millis	0034-0039-0000	8809		105 PLEASANT ST	NSFR	0		
vn of Millis	0034-0041-0000	5057		SPENCER ST	NSFR	0		
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