

Township Adopts Stormwater Management Fee

Stormwater has become highly regulated requiring frequent inspection, maintenance and quality monitoring, similar to water, sewage or other utilities. Costs for these activities are expected to continue increasing with growing regulatory requirements; thus the need for the Township to be more proactive with the maintenance of existing storm sewer systems and requirements for new infrastructure necessary for regulatory compliance. To fund the increased financial burden Brighton Township has adopted a Stormwater Management Fee effective in 2019. The fee will be billed annually to each developed property within the Township on or about February 1st. The rate has been established at \$66.00 per year (\$5.50 per month) for each single-family detached residential property. This fee unit is identified as an Equivalent Residential Unit (ERU). An ERU is designated as 4,700 SF of impervious surfaces based upon the Township's Stormwater Management Fee Analysis and Report. Non-single family properties will pay fees based upon how many ERUs their property has. Berkheimer will conduct the billing operation.

Newsletter articles over the past two years have specified how the Township is required under its NPDES General Permit issued by the Pennsylvania Department of Environmental Protection (PADEP) to implement Best Management Practices (BMPs) over the next several years to achieve a required reduction of pollutants identified within the Pollutant Reduction Plan (PRP). The PRP is part of the Township's NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4). The PADEP has identified impaired waters that are applicable to the Township's PRP. Brighton Township has five (5) existing streams with identified impairments. An Unnamed Tributary to the Beaver River (known locally as Hamilton Run) is impaired for Siltation; Two Mile Run is impaired for Siltation; Ohio River is impaired for PCB and Pathogens; Bradys Run Lake is impaired for Nutrients; and Beaver River is impaired for PCB and Pathogens. To achieve the required reductions of the identified pollutants, the Township is required by law to implement the BMPs within the current

five (5) year permit period. Options available are Stream Restoration projects at areas of known streambank erosion and Filtering Practices by retrofitting existing dry detention basins to provide additional storage for treatment through engineered filtering media practices.

Other compliance requirements of the Township's NPDES MS4 Permit to maintain water quality in our surface waters is the implementation of an Illicit Discharge Detection and Elimination (IDD&E) Program to monitor discharges from its storm sewer system. Part of the IDD&E Program includes annual routine screening of outfalls, or discharge points, throughout the Township. Approximately 20% of the Township's known outfalls are screened each year, so that all outfalls are visited at least once in



each five year permit cycle. Any discharge of water from the Township's storm sewer system not composed entirely of stormwater is considered an illicit discharge. When discovered, these discharges are tested in the field and a sample is taken for laboratory testing to determine if there is a presence of pollutants. Once tested, an investigation for the source of any pollutants is conducted. Potential sources are an illegal sanitary sewer connection or instance of illegal dumping. Steps are then taken as appropriate to eliminate the pollution source.

Implementing the BMPs is costly, and Brighton Township and other municipalities are now faced with the task of evaluating how to pay for this expensive unfunded mandate. The PA Legislature approved the use of Stormwater Fees as a funding source for these recurring expenditures, as

opposed to a reliance on real estate tax increases. As reported last year, the Township commissioned the preparation of a Stormwater Management Fee Analysis and Report to establish the foundation of the Stormwater Service Fee. Unlike tax collections that fund general municipal purposes, the Stormwater Management Fee is a stable and reliable funding source dedicated to stormwater related activities and expenses, just as water and sewage charges are. Unlike real estate taxes, exempt properties are also subject to this fee, making for a more uniform application of cost/benefit. Over 23% of the assessed value of properties in Brighton Township are tax exempt.

To establish the previously referenced ERU, the study evaluated the presence of impervious surfaces through the use of aerial imagery and Geographic Information Systems (GIS) within a randomly selected sample of 100 single-family residential lots and determined 4,700 SF as the average. An impervious surface is a hard surface which prevents or impedes the entry of stormwater into the soil in a manner that water would have entered the soil under natural conditions pre-existing to development, such as: roof tops, driveways, compacted surfaces, sidewalks, accessory structures, etc. Non-residential properties are individually evaluated on a lot-by-lot basis. All stormwater related costs were tabulated, along with future capital improvements, including infrastructure replacement. A final step was the evaluation of credits for existing or newly constructed stormwater BMPs that are owned and maintained by property owners, and are part of an inspection program established by the Township.

Establishing the Stormwater Management Fee was a decision processed over the prior two year period. It was selected over an increased real estate tax levy to provide a dedicated funding source that was equitable for each property, including tax exempt properties. The funding will permit the Township to meet the requirements of more stringent federal and state regulations for stormwater management, and provide enhanced maintenance and improvements to existing infrastructure.