

**ST. MARYS STORM WATER MANAGEMENT PROGRAM
AND
PROPOSED STORM WATER UTILITY
March 23, 2020
Revised May 5, 2021
FREQUENTLY ASKED QUESTIONS**

The following questions were submitted by the public and City Council members to the St. Marys Storm Water Task Force. Answers were provided by the Storm Water Task Force, Public Works Department, and the consulting firm of GMC/EPG (Goodwyn, Mills and Cawood/Ecological Planning Group) of Savannah.

What is a Storm Water Utility?

1. Storm Water Utility (SW Utility) – What is it and how would it work?

Utilities are funding mechanisms that charge a fee for services provided. A storm water utility supports storm water management and other programs related to water resource protection. While property taxes are based on the value of the property, a storm water fee must be related to each property's contribution to the problems being addressed by the City's storm water management programs (SWMP), namely through discharges of storm water runoff and pollution. Fees are typically based on property characteristics having a strong relation to runoff and pollutants, such as impervious area. A Utility is not a tax and revenues generated from fees must only be used to support water resources programs.

2. What programs would be supported by the Utility?

The City intends to use the Storm Water Utility to fund all programs related to the maintenance of the existing drainage infrastructure in order to maximize its useful lifespan; educate the public about storm water issues; and invest in the City's drainage infrastructure through implementation of capital improvement projects (CIP) to upgrade and maintain the drainage system, address present and future flooding issues.

3. This is a tax, why are you calling it a fee?

The money in a SW Utility comes from a service fee to pay for a separate system designed to handle only storm water run-off. It is not a tax. A Storm Water Utility is a dedicated source of funding that cannot be shifted to other efforts at the discretion of any elected official(s) or staff personnel. Refer to question 1 (above) for further detail.

As identified in St. Marys 2008 Storm Water Master Plan, the City and its citizens must take immediate action to fund the maintenance, repair, and upgrade of the City's aging Storm Water Drainage System. Refer to question 11 (below) for additional information.

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4. Is this some crazy idea you all created to get more money from us? Why does St. Marys have to charge for doing what you should have been doing? No other city does this, why should we?

St. Marys cannot afford to tackle every storm water issue in an adequate and timely manner because of a lack of funds. If a Storm Water Utility is approved, it will generate the necessary funds to address the impact of storm water flooding to residents and businesses to their properties.

Currently, there are 65 cities in Georgia that have a Storm Water Utility including several coastal and southern Georgia cities such as Hinesville, Garden City, Valdosta, Statesboro, Richmond Hill, and Brunswick.

*Downtown St. Marys Strategic Vision and Plan “2015” incorporates storm water features into new developments and projects
(<http://www.stmarysga.gov/St.%20Marys%20Report%20FINAL.pdf>).*

5. Could funds collected through the SW Utility be used for other County programs?

No. Georgia administrative code requires that income derived from a utility be dedicated special revenue that can be used only to support programs related to the utility. In this case, storm water management and water resource protection.

6. Do other localities use a SW Utility fee to fund storm water programs?

Yes. Storm water utilities were first established in the US in the early 1970s and in Georgia in the early 1990s. There are currently nearly 1,600 SW Utilities in the US (source: Western Kentucky University Storm water Utility Survey, 2016). Over 65 Georgia city governments have established storm water utilities, including coastal cities and towns of Hinesville, Garden City, Valdosta, Statesboro, Richmond Hill, and Brunswick.

7. Why is City of St. Marys considering a SW Utility?

Over many years, increasing federal and state mandates – as well as a desire by the City Council to better achieve City infrastructure and environmental goals – has increased storm water program revenue needs.

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8. Will a SW Utility result in the creation of a new bureaucracy?

A SW Utility will not result in the creation of a separate organization or a new City department. Revenues from the utility will be used to support existing staff and mandated programs related to storm water management plan and water resource protection, as well as some program enhancements to better achieve City needs and goals.

In mid-2019, four full-time workers were hired to specifically maintain the city's existing storm water drainage system. The Storm Water Utility will permit funding a second dedicated storm water crew needed to address current, urgent and future storm water and flooding issues. A number of these issues are identified the city's Storm Water Management Program (SWMP).

*See the listing of 2008 "Capital Improvement Projects" and attached GIS maps of the proposed capital improvement projects at the web link:
http://stmarysga.gov/document_center/plans_reports_studies/Storm_Water_Master_Plan_June_2008.pdf*

NOTE: At this writing, Capital Improvement Projects are the original 52 projects identified in the 2008 edition of "City of St. Marys Storm Water Master Plan". An updated edition of the City's Storm Water Master Plan is not available at this time. Capital improvement projects are prioritized based on need and will be completed across the entire city. A more readable listing of CIPs will be available soon online. Also, a copy is available at the Public Works office.

9. Why has a SW Utility been recommended as the funding mechanism?

A SW Utility has the following advantages:

- i. Fairness – A utility fee based on a property's impervious area more closely relates to the demand a property places on the storm water system and on water resource protection efforts than its real estate property value. For that reason, a utility is considered a fairer way to allocate total program costs to individual properties.*
- ii. Stability – A utility will result in a dependable and steady revenue stream that grows with the community; this stability will allow for long-term program development and planning for capital investments.*

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- iii. *Regulatory preference – A dedicated funding source is preferred by federal and state regulators and would create advantages for the City when being audited or applying for grants.*
- iv. *Wider funding base – Government- and tax-exempt- properties – are charged under a utility but not charged under taxes. These entities contribute to the storm water and pollution burden as well as homeowners and businesses.*

10. How have the City’s storm water programs been funded in the past?

All storm water programs have been supported by the City’s General Fund – whose sources comes from property taxes, other local taxes, and state and federal revenues.

11. What is the total cost of the City’s storm water programs? How is that cost expected to change over time?

The cost for the existing Storm Water Drainage program is \$761,278¹. Currently, the existing Storm Water Drainage program is paid from the City’s General Fund. However, this source of funds is not sufficient to pay for design and construction of needed drainage capital projects, nor is it sufficient to retire drainage related debt payments. The SW Utility will provide supplemental funds to upgrade the existing storm water drainage infrastructure and address flooding issues through targeted capital investment projects.

In the first year, new program features will increase the Storm Water Management Program by \$600,000². New program features will include \$200,000 for a dedicated drainage crew; \$50,000 for contract services; \$25,000 for road paving and drainage supplies; and \$325,000 in Capital Improvement Projects². The projected grand total for storm water expenditures will be approximately \$1.4 Million.

The 2008 Storm Water Master Plan identified over 52 capital improvement projects (CIP) at \$6.9 million dollars with \$4.0 million identified as High priority. Sadly, St. Marys and the country experienced a major Recession in 2008 where City funding for drainage operations were cut significantly and a dedicated drainage crew let go. During intervening years, only 2 capital improvement projects of the 52 were completed using grant funding while St. Marys’ existing drainage infrastructure has been maintained at minimal level. Updated cost for 52 CIPs is estimated at \$7.4 million dollars and additional dollars for “P” projects.

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References: (1) January 28, 2020-Work Session-Task Force and City Council, slide 27; (2) February 23, 2021-Presentation of the Storm Water Task Force, slide 20.

12. This just looks like another cash-grab. Why isn't basic stuff like infrastructure already budgeted for? Why the sudden need?

Infrastructure has been maintained to the maximum extent possible with available city resources, i.e. General Fund.

As early as 2008, a Storm Water Master Program (SWMP) identified over 52 projects requiring \$6.9 million in needed capital improvements with \$4.0 million identified as High priority. Only 2 of those projects have been completed due to a lack of funding. There are not enough funds in the City's General Fund to pay for needed drainage system capital improvements; do preventive maintenance; and upgrade and repair existing drainage system. To stretch financial resources, storm water problems are handled on an "as needed" basis and prioritized by the health and safety of the citizenry.

In 2010, the City was forced to let go two dedicated storm water crews due to the impact of the 2008 Great Recession. The Recession severely impacted property values and in turn tax revenue. This event set back St. Marys SWMP ability to be proactive in addressing storm water run-off and local flooding issues.

The Storm Water Management Program (SWMP) is to be funded by the proposed SW Utility. The dedicated SW Utility funds will allow timely response to resolving routine storm water drainage issues. In addition, St. Marys' SW Utility will provide the financial resources necessary to identify, anticipate, and act on problems before they become critical.

The Storm Water Task Force, appointed by City Council, held meetings; studied current storm water issues; identified storm water issues with input from the public; and presented their recommendations and findings to the City Council. City Council considered the recommendations and directed the Storm Water Task Force (SWTF) to develop the structure of a Storm Water Utility and recommend a proposed fee.

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13. When is the City expected to decide whether to establish a Storm Water Utility fee?

At the February 2020 City Council meeting, the Storm Water Task Force presented their recommendation to establish a SW Utility based on their detailed study and development of systems and policies to establish a Storm Water Utility. The utility must be officially approved by the City Council in accordance to City Code of Regulations. The Storm Water Utility fee proposal will be submitted to City Council for approval as well.

14. What is the upcoming schedule for implementing the SW Utility?

The City Council will have a “work session” to discuss the final proposed utility rate structure and credit policies in the spring of 2021. If you wish to attend, check the City’s calendar of events for the time and place at the website http://www.stmarysga.gov/calendar_app/index.html.

This “work session” will also be announced in the Tribune & Georgian newspaper.

After the “work session”, a public hearing will be held between the public, Storm Water Task Force, and City Council at a TBD location, date, and time. At the hearing, the public will have the opportunity to voice further comments regarding the proposed utility. Refer to the City’s calendar of events and the local newspaper for location, date, and time.

If approved by the City Council, the SW Utility will go into effect sometime in 2022.

15. Should there be a referendum for the citizens to determine if a Storm Water Fee should be established? Who can I contact if I have other questions or want to share my thoughts about the proposed SW Utility?

No referendum is called for when deciding to implement a fee for a service.

Citizens are encouraged to share their thoughts or ask questions by using one of the following three methods:

- i. St. Marys Storm Water Management website and clicking “Submit Your Question.” http://www.stmarysga.gov/storm_water_management/index.php
- ii. Email stormwater@stmarysga.gov
- iii. Place your questions or thoughts in writing at the water bill payment drop box on the Dillingham side of City Hall.

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The Storm Water Utility is a mechanism designed to fund a Storm Water Management Program through a fee. City Council is composed of elected officials who must act in the best interest of the city. Further, the Storm Water Utility will be a dedicated source of funding that cannot be shifted to other efforts at the discretion of the elected officials or staff personnel.

What is an impervious area and how does it relate to storm water run-off, flooding, and the proposed SW Utility rate?

16. How is storm water different from flood water?

St. Marys is vulnerable to 3 types of flood water:

- i. Coastal (storm surge & extremely high tides)*
- ii. Shallow (storm water that cannot be adequately drained by the storm water infrastructure)*
- iii. Riverine (storm water associated with large amounts of rain throughout the entire St. Marys River watershed)*

Storm water run-off from heavy rain fall by itself can overwhelm an aged storm water drainage system especially if there are significant areas of imperious surfaces. In this event, one can expect localized flooding if improper or poorly maintained drainage exists. Combined with poor drainage and one or more of the 3 types flood water, flooding becomes widespread with severe consequences.

17. What is an impervious area?

Impervious areas are those that prevent rainfall from readily absorbing into the ground. Impervious areas include buildings, parking lots, driveways, and roadways. The amount of impervious area within a watershed is strongly linked to the health of the receiving water; the higher the percentage of impervious area, the more impaired the stream or wet land is likely to be. General note is that areas of compacted gravel are considered impervious.

18. How will the amount of imperious area on property be measured?

The storm water utility will not require collecting new data about properties. The City will use the following existing data to compute utility fees:

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- i. *Impervious areas:*
 - *buildings, including commercial structures, homes, garages, barns, outbuildings*
 - *parking lots*
 - *driveways* (it is proposed that a portion of residential/farm driveways be considered)*

- ii. *Parcel data:*
 - *boundary lines*
 - *ownership information*
- iii. *Storm water facilities:*
 - *footprints*
 - *watershed boundaries*

The City will not consider the following as impervious area as part of the storm water utility fee computation:

- i. *private roadways*
- ii. *sidewalks (except some as parts of commercial sites), walkways, patios, decks*
- iii. *hay bales, tanks, farm equipment, trucks, trailers, and any other movable equipment*

How are you going to measure the impervious surfaces to calculate the SW user fee? What is the proposed utility rate?

19. How would the proposed Storm water user fee be calculated?

The SW user fee is proposed to be based on the amount of impervious area on each property, with some additional considerations. Impervious area will be tallied in blocks of billing units called an Equivalent Residential Unit (ERU); each ERU is 3700 square feet of impervious area which equals one billing unit. Natural rounding will be used. For instance, 1.49 would be rounded down to one billing unit, while 1.50 would be rounded up to two billing units.

- i. *A single-family residential (SFR) home's monthly Storm Water user fee will be a flat 1 ERU or 1 billing unit. The proposed utility user rate is \$5.00 per billing unit. If the SFR is a duplex on a single lot of record, Section 80-9 (e) (1) (i) states*

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“each customer account on that parcel will be charged 0.5 ERU per month for billing purposes.” Additionally, see Section 80-9 (e) (1) (ii), “where two or more dwelling units exist within or are attached to a single residential structure, and each unit is situated on a different lot of record.” In this case, each unit will be charged 1.0 ERU per month. See Note 2 for the web link to the Storm water Utility Ordinance Chapter 80 for further billing details.

- ii. A Non-Single Family Residential (NSFR) is a multi-family, commercial, industrial, institutional, or governmental entity whose monthly Storm water user fee will be calculated on the total square footage of impervious area as determined using the City’s Geographic Information System (GIS) and then divided by 3700 sq. ft. to calculate the number of billing units. The resulting number of billing unit(s) times the utility rate (\$5.00/billing unit) is the monthly Storm water user fee.*

- iii. Undeveloped land is assigned 0 ERUs and will not receive a storm water user fee bill.*

In summary, a Single Family Residential (SFR) is based on a median impervious area of 3700 sq. ft. An area of 3700 sq. ft. is one Equivalent Residential Unit (ERU). 1 ERU is 1.0 billing unit. The amount of impervious area is calculated based on mapping data from St. Marys’ Geographical Informational System (GIS). SFR monthly Storm Water user fee will be a flat 1 ERU or 1 billing unit.

Non-Single Family Residential (NSFR) property is based on the actual impervious surface area as determined from aerial photography and GIS.

Undeveloped land is assigned a 0 ERU.

NOTES:

Note 1: The utility rate will depend on the finalized rate structure and credit policies, which has not yet been decided by the City Council.

Note 2: See City Ordinance Chapter 80 entitled “Storm water Utility” found online at http://www.stmarysga.gov/citizen_boards/Stormwater_Task_Force/Ordinance%20FINAL%20with%20revised%20billing%20start%20date%201-29-2020.pdf

In Section 80.9(e), “Calculation of User Fee Charges” is where the instructions are on how to calculate your Storm water user fee.

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20. I am a business owner. How do I measure my surface area?

Refer to answer 20 ii and obtain an online a copy of your property's GIS information at http://www.stmarysga.gov/departments/community_development/gis_and_mapping_services/index.php. Also, consult your "as built" plans and plot survey.

21. Where do I go to challenge my charge and what evidence I need?

Contact the Storm Water Utility Manager to discuss any discrepancies in the fee calculation and/or impervious area.

22. Does every developed property get measured and pay a different amount?

Refer to answer 20 ii and the following paragraphs in answer 20.

23. What is a GIS and how does the City collect the GIS data used to calculate utility fees?

GIS stands for Geographic Information System. It is computer software designed to capture, store, analyze, and present spatial or geographic data. The City has used a GIS for years to improve operations such as capital planning, emergency response, and development tracking.

Various data has been developed since the late 1990s for a variety of purposes. New data is obtained as land is subdivided and improvements are constructed. For instance, City staff will map the corners of new buildings – during the permitting process – using a highly accurate (sub-meter) GPS device. Older data was originally mapped by City staff and consultants from tax maps and aerial photography. The City does not rely on automated or computerized processes to map impervious areas. Once buildings, parking lots, and other features are mapped, they are generally not re-mapped unless a permitting process proposing new development is initiated on the property. However, City staff will occasionally compare mapped features to new aerial photography to identify missed features.

24. What is the proposed utility rate?

The utility rate is dependent on several factors, including the methodology to compute billing units and the credit policies. These factors are scheduled to be formally considered by the Storm water Task Force at the "work session" at a TBD in the spring of 2021.

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Based on the current proposal and assumptions, the utility rate to be recommended will be \$5.00 per billing unit.

25. How can I find out what my utility fee would be under this proposal?

Once the proposed rate structure and credit policies have been approved by the City Council and the proposed utility rate is confirmed, property owners will be able to look up their utility fee online. The web link will be provided when the Storm Water Utility is approved.

How will the billing work?

26. How would I be billed for the proposed SW Utility fee?

If a storm water utility fee is enacted, the utility fee would be included on water, sewer, and trash bill– issued monthly by the St. Marys Utility billing department.

27. What happens if I don't pay?

The fee is included on your monthly water bill. Not paying your bill can result in the loss of services.

28. Where will I be charged for this?

The Storm Water fee will be included in the monthly utility bill.

29. Where do I go if I have a problem with my bill and who do I speak with?

St. Marys' Utility Department Customer Service Representatives are trained to assist you regarding your utility bill.

30. Where do I go to challenge my charge and what evidence I need?

Contact the Storm Water Utility Manager to discuss any discrepancies in the fee calculation and/or impervious area.

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31. Will the Storm Water charge go away?

We do not anticipate the fee going away. The Storm Water System will always require maintenance and require dedicated manpower to provide that maintenance. Additionally, damages to the system can be anticipated as well as the need for new projects in the future as the city ages and grows. The Storm Water Utility fund provides for those needs the same as the water and sewer utilities do for water and sewer systems.

32. Is my water bill going to be reduced when you start this fee?

No, your water bill will not be reduced because water and storm water are separate utility services.

Are there exempt properties and user fee reduction through credits?

33. What properties would be exempt from the fee?

Only those properties owned by entities implementing their own State-regulated Storm water Management Program (SWMP) would be exempt from the utility fee. In St. Marys, these exempt entities include public roads, private roads, portions of private driveways, and railroad beds.

34. Can I receive credit for reducing storm water runoff on my property? Where do I get information on the Utility rate fee credit procedure?

Under the proposed structure, yes. Your utility fee would be able to be reduced if you take measures to reduce your property's discharges of storm water volume or pollution. For instance, you can receive credit if your property is served by a structural storm water management facility, whether built voluntarily or as a condition of development. You could also receive credit for other practices, such as installing rain barrels, conservation landscaping, or pet waste stations. To determine what credits are available to reduce your user rate, go to "City of Saint Marys Storm water Utility-Storm water Utility User Fee Credit Manual" at www.stmarysqa.gov/citizen_boards/Stormwater_Task_Force/Credit%20Manual%20-%20Final%20-%202012-10-19.pdf

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35. Do gated communities get automatic credits?

No! Homeowners living in gated communities do not automatically get a Utility User Fee credit.

The HOA or owner of the subdivision (known as primary applicant) on which a single Best Management Practice (BMP) (i.e. detention pond) or several BMPs is located fills out an application for the Utility User Fee credit and attaches a memorandum of agreement (MOA). A MOA contains the property owners' names in the subdivision seeking the Utility User Fee credit. The completed application and MOA are submitted to the City of St. Marys. There is no distinction to gated communities or ungated communities.

The draft Storm Water Credit Manual (dated November 2019) on pages 5-7 explains the fee credit application procedure. The draft Storm Water Credit Manual is located at the following web link:

www.stmarysqa.gov/citizen_boards/Stormwater_Task_Force/Credit%20Manual%20-%20Final%20-%202012-10-19.pdf

36. We are a 501c3. We should be exempt from this charge. Why are we required to pay it?

The Storm Water Utility is a service that is paid for by a user fee which relates to other service fees such as water, sewer, and trash.

37. I am on a fixed income and don't have the money to pay this. What can I do?

The user fee is included in the monthly water, sewer, and trash bill.

Credits up to 50% of the \$5 fee are available to Single Family Residential (SFR) and Non-Single Family Residential (NSFR) customers. Refer to answer 36 for potential credits you may be eligible and review the credit manual for the procedures to apply. Website:

www.stmarysqa.gov/citizen_boards/Stormwater_Task_Force/Credit%20Manual%20-%20Final%20-%202012-10-19.pdf

38. Are there any "credits" available for economic hardship families/individuals?

Credits up to 50% of the \$5 fee are available to Single Family Residential (SFR) and Non-Single Family Residential (NSFR) customers. Refer to answer 36 for potential credits you

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Is a Storm Water Utility for St. Marys necessary?

39. What would be the consequences to the City if no Storm Water (SW) Utility was established?

It's not a requirement to set up a Storm water Utility. However, without adequate funding to maintain and upgrade the existing drainage system, the City residents will continue to experience increasingly serious flooding issues. The existing storm water drainage infrastructure will continue to decline and eventually fail, and the City will be less prepared for the effects of severe rains, tidal rises, and climate change.

St. Marys residents ability to obtain National Flood Insurance through the Federal government's National Flood Insurance Program (NFIP) may be jeopardized. St. Marys residents would not qualify for additional NFIP flood premium discounts to reward good floodplain management through drainage upgrades funded by a SW Utility.

City growth would be severely limited in the ability to attract new businesses, industry, and new residents.

40. Would the failure to implement a SW Utility negatively affect the city's community rating system (CRS)? CRS rating affects flood insurance premiums. Currently residents get a 10-15% discount on their premium for a CRS 6 rating.

It would not directly affect the CRS program, as it is currently being implemented without a storm water utility. However, it will impair the City's ability to maintain and further reduce the City's CRS rating in the future due to a lack of resources.

41. How would homes and businesses experiencing periodic flooding benefit from a Storm water Management Program (SWMP) as funded by a SW Utility?

They would experience a direct benefit from implementation of the storm water user fee, and this is one of the primary reasons that the City is considering its implementation. Lack of proactive maintenance of the drainage system is one of the primary reasons homes and businesses experience periodic flooding. The storm water user fee is

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dedicated to fund drainage maintenance crews, routine drainage system maintenance, fund capital improvement projects, and address drainage issues related to future developments.

42. Will property valuations improve or at least be preserved by funding a SW Utility that pays for the CIPs identified in the proposed SWMP?

A plan to maintain and upgrade infrastructure is an important economic development tool. Having a funded Capital Improvement Plan is one of the elements that employers will look for when coming to a new community. A plan to reduce flooding risk is also something that can help preserve and even improve property values, both residential and commercial.

43. Would St. Marys ability to secure state or federal grant money be harder should the SW Utility be rejected?

Securing State and Federal grant money requires match funding from the City. Without the revenue source that the Storm water Utility would provide, the City will have a more difficult time finding match for any grant or loan programs. Furthermore, most of the City's future SPLOST (Special Local Sales Tax) revenue is already committed to Water & Sewer debt service leaving very little money available to pay for or amortize capital expenses.

44. Does a proposed SWMP compliment/enhance the city's existing Erosion and Sediment Control Program (ESCP)?

ESCP is really a function of a larger storm water management program (SWMP). More funding for storm water management services would provide additional resources for all elements of this program, including ESCP.

45. Is a SWMP necessary to comply with non-funded mandates? Specifically, what are these non-funded mandates and specifically what requirements must the city comply?

There are several non-funded mandates that the City must comply with that are considered "storm water" services and are part of the overall SWMP, including:

- i. Implementation of the Watershed Protection Plan, which is a requirement of the City's NPDES Wastewater Discharge Permit. This requires watershed*

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monitoring and implementation of a variety of storm water best management practices.

- ii. *National Flood Insurance Program. In order for property owners in the City to be eligible to get flood insurance through the NFIP, the City must implement a floodplain management program. This is the basic program, and it is not optional, like the CRS program, which relates to services above and beyond the basic floodplain management program.*
- iii. *Total Maximum Daily Loads. The St. Marys River is listed for water quality impairment and has a TMDL that was established by the EPD (Environmental Protection Division of GA). Furthermore, the City participated in a Watershed Management Plan (WMP) effort that lists several responsibilities the City has for reducing pollutants that could impact the St. Marys River. Participation in the WMP and compliance with the TMDL is what enabled the City to receive over \$400K to implement storm water practices along St. Marys Road, as part of the streetscape project.*

46. Is it true a SWMP is essential to the proper and effective operation of the city's sewer system?

Proper maintenance of the storm water system and reduction of flooding will reduce inflow and infiltration into the City's sanitary sewer system. This will extend the lifespan of the City's sanitary sewer infrastructure and wastewater treatment plant capacity.

47. Is a funded SWMP required for a Phase II MS4? Is the Phase II MS4 a federal regulatory mandate?

The City of St Marys is not yet an NPDES Phase II MS4 permittee, however, after the 2020 Census, the City could be designated as a permittee (based on its level of urbanization) and would then have to comply with the requirements of this permit to have an expanded SWMP. If and when the City does become an NPDES Phase II MS4 permittee, the City will be required to implement a comprehensive SWMP that will require additional resources. The City will need to fund that program one way or another, and non-compliance with the NPDES Phase II MS4 permit can result in fines from EPD and EPA.

48. Is the TMDL (Total Maximum Daily Load) a GA and Federal regulatory mandate governing the city's sanitary treatment outfall(s) only or does the TMDL include

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contributions by sanitary treatment outfalls and storm water outfalls? In other words, is a SWMP necessary to comply with the TMDL mandate?

See 46 iii answer above.

49. If an entity exceeds a TMDL what happens? Are fines levied against the polluter?

For storm water discharges, it's not cut and dry. At the moment storm water discharges do not have a numerical limit and are regulated based on the City's efforts to reduce pollutants to the "maximum extent practicable." The City's best defense to a regulatory agency is stating that the SWMP is being fully implemented in accordance with an approved plan. In the case of a TMDL, that would be the Watershed Management Plan. If the City is not actively implementing its SWMP in accordance with that plan, then that can be considered "non-compliant." I am not currently aware of any community in Georgia being fined for a storm water program that is not in compliance with a TMDL. However, the EPA has recently fined communities for non-compliance with their NPDES MS4 permits. So, at some point in the future when St. Marys becomes a regulated NPDES MS4 community, not implementing the SWMP to the "maximum extent practicable" can and will result in fines.

50. In summary, what happens if the City does not establish a Storm Water Utility? What is affected?

The present storm water system will continue to deteriorate without adequate and dedicated funding.

It will jeopardize St. Marys' residents' ability to obtain National Flood Insurance through the Federal government's National Flood Insurance Program (NFIP).

NFIP voluntary program offers discounts on flood insurance premiums to reward good floodplain management within the community. Communities receive additional points for implementing preventative measures to reduce flooding above minimum standards. The more points gained above minimum standards the higher the reduction on flood insurance premiums. Currently, St. Marys' residents receive 10-15% discount on flood insurance premiums with a point grade of 6.

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Identified capital improvement projects will not be addressed in a timely manner if the City simply relies on funds from the General Fund and any matching grants. The source of dollars allocated to storm water management is limited to the taxes collected.

The City's growth is severely hampered, devalued property, and loss of appeal to new businesses, industries, and new residents.

Miscellaneous and Uncategorized Questions

51. Who do I call to find out if a drainage ditch on my property is my responsibility to maintain or is it the City of Saint Marys responsibility?

You are to call the City's Public Works Manager (912-882-4415, Monday thru Friday: 7AM to 3:30 PM) to schedule a meeting to determine who's responsible to maintain a drainage ditch on your property. If you have a copy of your property survey map, you are encouraged to bring it with you when you meet with the Public Works manager.

52. Is this just part of the whole sea level rise hysteria?

The Sea Level Rise study conducted by Marine Extension and Georgia Sea Grant at UGA provided good data that was used by the Storm Water Task Force (SWTF). The study identified several areas that routinely flood due to storm water, not just sea level rise. This data was used by the SWTF to provide further proof for a separate fund that could function to ensure storm water issues are addressed in a timely manner.

53. I've seen all the work at the end of Ready Street and yet it still floods!

The water at the end of Ready Street is not related to storm water. This water comes from tidal water. When the tide rises above the level of the riverbank at the end of the "Ready Street Outfall," the tide water overflows onto Ready Street.

54. How do we know that our money will be used equally throughout the city and not just downtown?

The Storm Water Fund is established as an enterprise fund and the money must be allotted to provide maintenance to the entire Storm Water System. The map of the 2008 proposed capital improvement projects can be reviewed online at the web link

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[http://stmarysga.gov/document_center/plans_reports_studies/Storm Water Master Plan June 2008.pdf](http://stmarysga.gov/document_center/plans_reports_studies/Storm_Water_Master_Plan_June_2008.pdf).

NOTE: At this writing, Capital Improvement Projects are the original 52 projects identified in the 2008 edition of "City of St. Marys Storm Water Master Plan". The 2021 edition of the City's Storm Water Master Plan is not available. Capital improvement projects are prioritized based on need and will be completed across the entire city.

55. Is there a list of capital improvement projects (CIP) so I can see if my area is on the list to get fixed?

See answer in question 54 plus the NOTE.

56. When will my area get fixed? Is there a timeline for the project list?

There is no timeline as of this writing. The projects are categorized by priority and will be scheduled according to the cost of the project and availability of revenue in Storm Water Utility and/or other source (SPLOST/Grants) being used for the project(s) scheduled in the fiscal year being planned.

57. Where can I go to find out when my area will be fixed?

See answer in question 58.

58. Where do I go to track the progress of my area project and other projects? What will the update tell me?

The Storm Water Utility Manager can be contacted at the Public Works Department (912-882-4415) as to the status of projects in progress. NOTE: The Storm Water Utility Manager is the Public Works Department Manager.

59. Do you have the people and equipment to start right away?

Yes! The city funds one dedicated crew from the General Fund and will continue to do so. This crew works solely on the Storm Water System using the existing equipment. One crew is inadequate to conduct the necessary Storm Water System routine maintenance and upgrades in a timely manner to mitigate flooding in local areas as a result of storm water. After the Storm Water Utility fund is approved, the Storm Water Utility Manager will begin actions to hire the second crew. After this crew is on board,

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citizens can expect to see improvements and over a period of a couple years should see the issues in the system causing problems in local areas mitigated, if not corrected.

60. Who prioritizes the capital improvement projects (CIP)? Who do I speak with to get the CIP benefiting my property assigned a higher priority?

The Storm Water Utility Manager is given the authority to prioritize projects subject to approval by the City Manager and City Council via budgeting process.

Any citizen may provide input on projects via a councilman, Storm Water Utility Manager or City Manager.

61. How is the project list created? Will the project list be updated on some regular basis? Where do I go to find the Capital Improvement Project list and the progress?

The current list is the 2008 Storm Water Master Plan developed by Thomas and Hutton Engineering Co. located in the Public Works Department (PWD) office, http://stmarysga.gov/document_center/plans_reports_studies/Storm_Water_Master_Plan_June_2008.pdf.

The status of each project will be updated by the PWD office and recommended projects commissioned by the City of St. Marys.

62. Will new project items be allowed to go in front my area's Capital Improvement Project?

Recommended projects may be submitted to the Storm Water Utility Manager for consideration.

The Storm Water Utility Manager will determine its relevance and priority in relation to other storm water projects.