City of McMinnville
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STAFF REPORT

DATE: July 18, 2023

TO: Jeff Towery, City Manager

FROM: Anne Pagano, Public Works Director

SUBJECT: Stormwater Utility Analysis Council Work Session August 8, 2023

Report in Brief:

The purpose of the City Council Work Session on August 8, 2023, is to provide background information and need regarding consideration of establishing a Stormwater Utility, and to provide an update on our progress in the analysis from our Consultant, Deb Galardi. We will also touch on the status of the Wastewater Master Plan, and the combined Advisory Committee that staff will be assembling.

Background:

Stormwater Utility

One of the City's values is Stewardship. As stated in the Mac-Town 2032 Strategic Plan, "*We are responsible caretakers of our shared public assets and resources. We do this to preserve the strong sense of community pride which is a McMinnville trademark*." Additionally, one of the Council's goals is to "*create and implement an environmental sustainability and/or a Climate Action Plan*". The City's stormwater system does not have sufficient and sustainable funding to achieve this goal relative to protecting waterways from pollution and erosion. There are long standing, substantial funding shortfalls for preventive maintenance, replacement of aging infrastructure, and to meet broader and increasingly restrictive water quality regulatory requirements.

This lack of resources compromises the City's efforts to be responsible environmental stewards. Limited funding from Wastewater Services and Street Funds provides resources to address reactive needs only. These funds are dedicated to wastewater and transportation needs. Consequently, the stormwater system has taken a backseat to targeted needs for these funds.

A stormwater utility would apportion operating and capital expenses to users based on system demand and benefit, similar in concept and practice used for the wastewater utility. A stormwater utility concept

is broadly recognized, in Oregon and nationally, as an equitable and sustainable approach for management of a community's stormwater system.

Wastewater Master Plan Update

The City contracted with Jacobs Engineering Group in 2022 to update the 2008 Wastewater Master Plan. The scope of work includes a system wide evaluation of the wastewater conveyance and treatment infrastructure. This includes new population projections, condition assessments and capital improvements needed to meet stringent permit requirements. The scope of work also includes an update of the City's wastewater user fees, Sewer Systems Development Charges (SDC) and Wastewater Financial Plan.

Discussion:

Stormwater Utility

The community's stormwater system serves a watershed area of approximately 10,700 acres through an integrated system of catch basins, detention basins, open channels (drainageways, creeks) and storm sewers. The service area within the Urban Growth Boundary encompasses roughly 8,400 acres of the watershed. Our earliest records for the system date back to facilities constructed in 1911 that have continued in service for more than 100 years.

Stormwater facilities include:

- 3,665 catch basins
- 17 detention basins
- 45 miles of open channel drainageways
- 114 miles of storm sewers

These facilities are significant, sustained investments in the stormwater system. They minimize health, life and safety risks during flooding, protect properties from damage due to localized flooding, protect water quality by capturing sediments, heavy metals and nutrients bound to these solids, and reduce oil and grease from entering waterways.

The regulatory environment for management of stormwater quality, most recently with the Mercury Total Maximum Daily Load (TMDL), have resulted in unfunded mandates the City must comply with to avoid enforcement action. The City will be embarking on an update to the 2009 Stormwater Master Plan next year and is currently working to meet Mercury TMDL requirements over the next five years as required by the TMDL. A dedicated funding source is needed for both activities soon.

Once the Stormwater Master Plan is completed, the City will have a list of capital improvements that are recommended over a period of time. A funding source will be needed to implement these projects.

In addition to current TMDL regulatory requirements, McMinnville, potentially in the near future, will be required to obtain a permit for stormwater discharged to drainageways and the South Yamhill River. This permitting process is authorized by the federal Clean Water Act as part of the National Pollutant Discharge Elimination System (NPDES) and goes by the acronym MS4 (municipal separate storm sewer system). MS4 permits regulate operation and management of the community's stormwater system, including streets, catch basins, constructed channels and storm drains. Municipalities that need to obtain an MS4 permit are classified as either a "Phase I" or "Phase II" MS4. Phase I MS4s cover areas with populations greater than 100,000 (large and medium) while regulated Phase II (small) MS4s serve populations less than 100,000.

EPA and DEQ have the discretion to require smaller communities or groups of communities to operate under an MS4 permit. Newberg, Albany, Ashland, Corvallis, Oregon City, Wilsonville are examples where DEQ has exercised their discretion to require MS4 permits for smaller cities. We anticipate the State Department of Environmental Quality will require McMinnville to operate under an MS4 permit within the next five-years.

Once in place, the MS4 permit will be a substantial, sustained, and costly regulatory requirement. Specific elements of an MS4 permit may include:

- Development and implementation of a Stormwater Management Plan
- Stormwater management programs for new construction
- Erosion and sediment control programs
- Programs to reduce illicit discharges and ensure proper disposal of household hazardous wastes
- Spill prevention and response program
- Ongoing water quality monitoring to characterize stormwater and identify pollutants
- Implementation of TMDL Action Plans
- Pesticide, herbicide, and fertilizer management programs
- Programs to address discharges from industrial facilities

McMinnville does not currently have dedicated funding to meet upcoming MS4 permit requirements. Compliance with the Federal Clean Water Act MS4 permits will be required but is also consistent with City's goal for responsive environmental stewardship. One element for the Stormwater Master Plan Update will be development of a comprehensive Stormwater Management Plan and projection of actions and funding needed to meet future MS4 permit requirements.

The City has a duty to comply with all elements of the MS4 permit or face enforcement actions by DEQ and possible third-party litigation. DEQ's specific language for non-compliance with permit conditions is cited below:

> *The permittee must comply with all conditions of this permit. Failure to comply with any permit condition is a violation of Oregon Revised Statutes (ORS) 468B.025 and the federal Clean Water Act and is grounds for an enforcement action. Failure to comply is also grounds for DEQ to terminate, modify and reissue, revoke, or deny renewal of a permit.*

The City's Operations, Wastewater and Engineering staff maintain this network and meet regulatory requirements within current funding limits. Limited and unstable funding has made operation of the system largely reactionary with no resources for a managed preventive maintenance program.

The infrastructure is aging and much of it has exceeded or is approaching the end of its service life. Funding for a storm sewer replacement capital improvements program has been largely absent. There are several known points of failure in the system along major storm drain trunk lines that are near failure and may require emergency repairs rather than planned replacements through a capital improvements program.

Our current funding approach for the stormwater system does not equitably apportion costs based on demand and benefits. Wastewater user fees are based on the volume and strength of wastewater. Street Fund revenue is funded from gas tax. The current funding approach limits services targeted for these funds. In the case of the Wastewater Fund, resources are diverted from preventive maintenance and capital improvements to clean and inspect high priority stormwater lines and meet emergency needs. Street funds are diverted for street sweeping, catch basin cleaning, and limited maintenance of detention basins. This funding could be dedicated to pavement management and measures to extend the service lives of arterial and collector roadways.

The Stormwater Utility Analysis was initiated to explore more equitable and sustainable ways to fund operation of the stormwater system. The analysis began in October 2022 when the City contracted with Galardi Rothstein Group to develop rate alternatives and a financial needs assessment, and to provide public engagement assistance. The Galardi Rothstein team is well known and experienced in development of stormwater utilities in Oregon and nationwide. A memorandum from the Galardi Rothstein Group summarizing our progress to date on the Stormwater Utility analysis is included as Attachment No. 1.

Over ninety percent of stormwater utilities nationwide use impervious areas as the basis for charging stormwater user fees. Impervious areas are used because stormwater runoff from these areas is directly related to stormwater system management needs. Consequently, one of the first steps in developing a stormwater utility is to determine a community's impervious areas.

The City retained the firm of Raftelis Financial Consultants, Inc. in April 2023 for GIS services to measure impervious areas for a sample of residential and all commercial, industrial, multifamily, and institutional properties. Raftelis completed their analysis of representative residential properties in June 2023. The impervious areas for residential properties are generally similar (with a few outliers) and a uniform charge for this user group has been assumed. A copy of Raftelis' residential property analysis is included as Attachment No. 2. There are significant variations in impervious areas for nonresidential customers and individual measurements for each customer are required to achieve equitable user fee rates. Measurements of non-residential properties are expected to be completed in September 2023.

Wastewater Master Plan Update

Initial data collection for the Wastewater Master Plan has been completed. Jacobs anticipates most of the technical work will be completed in early 2024. The technical analysis will result in recommended conveyance and treatment improvements. Staff anticipates the recommended improvements will be substantial given a tightening regulatory environment and our discharge to the South Yamhill River, a low flow stream.

The final step in the Wastewater Master Plan update will be to consider how the recommended operating, maintenance and capital needs can be funded. This will involve a review of user fee rates, fee structure and Sewer SDC charges.

Public Engagement

Targeted public engagement is essential to community understanding, support, and policy choices regarding the level of service, cost of this service and rate payer equity in apportioning costs for the stormwater and wastewater utilities.

Staff will be using public engagement tools to help foster a transparent, open process as alternatives are developed. These tools include, but are not limited to:

- Project status summaries on the City's IHeartMAC web site,
- Technical information regarding stormwater and wastewater rate alternatives,
- Public meetings to share results of the Stormwater Utility Analysis,
- Public meetings to share results of the Wastewater Master Plan,
- Presentation to the City's Affordable Housing and Diversity, Equity and Inclusion Committees,
- City Council Work Session to share results of the Stormwater Utility Analysis, and
- City Council Work Session to share results of the Wastewater Master Plan.

A combined Stormwater/Wastewater Project Advisory Committee will be efficient given the commonality of infrastructure, regulatory and environmental requirements, understanding utility rate financing, cost allocation, rate equity and rate credits.

The Stormwater Utility and the Wastewater Master Plan Update are, in themselves, significant community investments. Funding recommendations from both efforts will have substantial, long-term financial and level of service value to the community. Staff will be recruiting representatives for the Stormwater/Wastewater Project Advisory Committee in August in anticipation of a first meeting in September 2023. The Project Advisory Committee would be a limited duration, project focused group that will engage and participate in the evaluation of funding alternatives for both utilities.

The Committee will be targeted at customer groups. A nine-member Project Advisory Committee will be formed with the following user groups represented.

(5) members, Single and Multiple Family user representatives
(1) member, Industrial user representative
(1) member, Commercial user representative
(1) member, Development Community user representative
(1) member, Institutional user representative

The financial impact and complexity of user fee structure alternatives are significant, and staff are recommending a City Council member serve as a liaison with the Project Advisory Committee.

The Project Advisory Committee will meet every other month for a total of 6 meetings between September 2023 and July 2024. We anticipate each meeting will be for approximately two hours. Additionally, the Committee or a representative will attend two City Council Work Sessions (one for Stormwater and one for Wastewater), and two public meetings (one for Stormwater, one for Wastewater).

Stormwater and wastewater topics will be discussed at each Committee meeting. The initial focus will be on the Stormwater Utility. This focus will change to the Wastewater Master Plan Update, rates and Sewer SDC as the Stormwater Analysis is completed and the scope and cost of recommended wastewater projects are available.

Recommendation:

Staff recommends the City Council appoint a Council liaison for the Stormwater/Wastewater Project Advisory Committee.

Attachments:

1. Galardi Rothstein Group Memo
2. Raftelis GIS report, ERU Analysis

PREPARED FOR:	Anne Pagano, Public Works Director
PREPARED BY:	Deb Galardi, Galardi Rothstein Group
SUBJECT:	Stormwater Utility Study
DATE:	July 13, 2023

Introduction

The City of McMinnville (City) is considering implementation of a stormwater utility and dedicated user fee to fund stormwater management. Galardi Rothstein Group was engaged by the City to assist in the development of a stormwater system funding plan and evaluation of rate structures and other program elements.

Stormwater utilities have been implemented by dozens of cities in Oregon to provide equitable and dedicated funding to meet regulatory requirements, and system operation, maintenance, and replacement needs. The chart attached illustrates a range of stormwater monthly rates charged in Oregon (based on 2021 data).

This memorandum summarizes key elements to be addressed as part of the stormwater utility development.

Stormwater Utility Development

Annual Revenue Requirements

As with the wastewater utility, annual stormwater funding requirements include capital and operation and maintenance costs, as well as policy-based set-asides for contingencies and reserves. Specific cost elements to be considered for stormwater include:

- Inspection and maintenance activities
- Regulatory compliance activities
- Public education
- Technical services

- Customer service
- Administration
- Capital improvements.

In estimating annual revenue needs, the project team is considering costs of existing activities (e.g., street sweeping, limited cleaning and inspection of stormwater lines and other assets) that are currently funded from wastewater rates or street funds, as well as additional costs needed to meet regulatory, environmental, safety, and system reliability needs. Different funding "packages" will be identified for the City Council's consideration to allow balancing of desired levels of service against customer rate impacts.

Stormwater Rate Structure

Site impervious area is the most common basis for recovering stormwater utility costs from customers, as it provides an indirect measure of stormwater discharge that has implications for stormwater management. Stormwater utility rate structures may also include per-account or dwelling unit charges for recovering costs that relate to customer services, billing, and in some cases, water quality and quantity costs associated with impervious area in the public right-of-way.

The determination of the portion of annual costs to be recovered from impervious area or other account or unit charges has direct implications on the distribution of costs to customer types (e.g., residential vs. commercial) and different sizes of customers. The project team is currently developing customer impervious area measurements for purposes of developing stormwater rate structure options. Once that process is complete, specific rate options will be developed and presented to the City Council for consideration.

Rate Modifiers

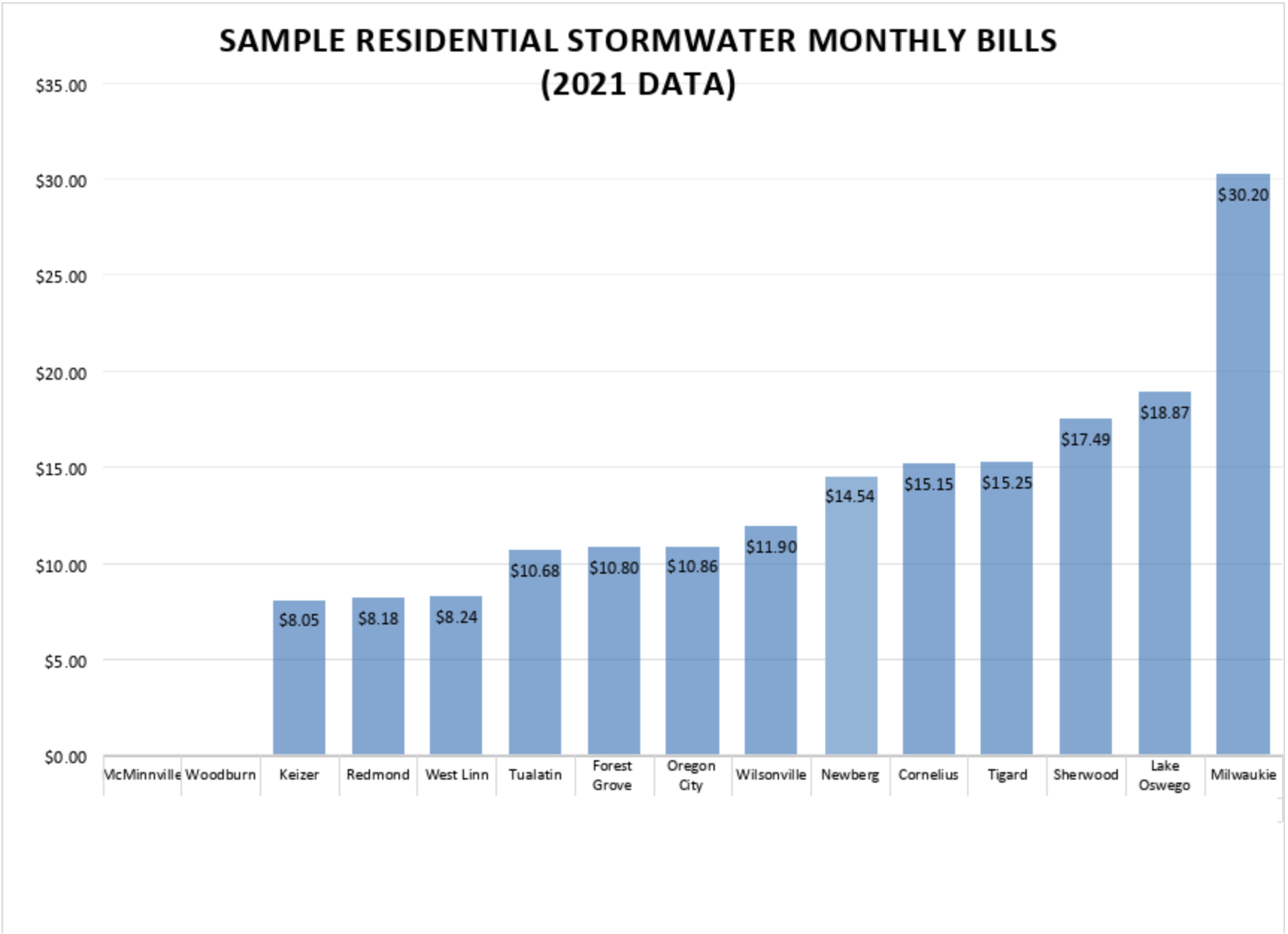
It is common practice for stormwater utilities to include credit or discount programs for private activities or investments that reduce a customer's impact on the stormwater system. Credit programs may include incentives for runoff volume or flow control, or water quality. Development of the credit program must balance customer incentives against the additional administrative costs associated with program implementation and monitoring.

Like the City's other rates, the stormwater rate structure may include policy-based discounts for customers experiencing financial hardships or other circumstances, and stormwater-specific exemptions (e.g., undeveloped parcels). Credit program options and other rate policies will be considered in the context of the rate structure and funding plan development.

Implementation Plan

Concurrent with development of the funding plan and rate structure will be the development of the implementation plan which will require coordination across multiple City departments and with McMinnville Water and Light to develop the legal, financial, and customer billing

framework to implement the utility and the associated charges. More details on implementation steps will be provided to the City Council at future meetings.


SAMPLE RESIDENTIAL STORMWATER MONTHLY BILLS
(2021 DATA)
$35.00
$30.00
$25.00
$20.00
$15.00
$10.00
$5.00
$0.00
$8.05
$8.18
$8.24
$10.68
$10.80
$10.86
$11.90
$14.54
$15.15
$15.25
$17.49
$18.87
$30.20
McMinnville
Woodburn
Keizer
Redmond
West Linn
Tualatin
Forest Grove
Oregon City
Wilsonville
Newberg
Cornelius
Tigard
Sherwood
Lake Oswego
Milwaukie

RAFTELIS

Attachment No. 2

City of McMinnville, Oregon
Stormwater ERU Analysis
June 8, 2023

The following analysis and results are presented by Raftelis to the City of McMinnville (City) in support of Task 1 of the Stormwater Utility Implementation Data Development project. This task includes the determination of an Equivalent Residential Unit (ERU) for the City, which is a billing unit often used by stormwater utilities with impervious area-based rate structures. An ERU reflects the typical amount of impervious area on a single family residential (SFR) parcel and allows for simplified billing of the largest customer group - single family properties. Impervious surface area is the most common rate structure among those communities with stormwater fees because it is a good measure of a ratepayer's demand on the stormwater system. The more impervious area on a property, the more stormwater the property generates and the greater the demand for the utility's stormwater management services. Raftelis' determination of the City's ERU is based upon the impervious area digitization analysis described below. The information provided in this memo describes Raftelis' methodology for completing this Task and the results of our analysis.

Data

Raftelis' analysis was based on 2022 aerial imagery and Yamhill County geographic tax parcels provided by the City in January and April 2023.

Methodology

A Raftelis GIS analyst began by generating a random sample of 400 parcels falling into one of the following Yamhill County Tax property class code (PCA) categories that represent the SFR class:

PCA Category	Parcel Count in Sample
101	322
109	11
111	18
121	2
191	2
207	31
401	6
409	3
451	1
551	3

PCA 101 also includes duplex and single-family attached (SFA) property types. Often, duplex properties have impervious area measurements and overall development patterns substantially similar to single family properties and are therefore good candidates for including in the SFR customer class. Therefore, Raftelis included them in this analysis. SFA properties were not

included in this sample and their impervious area will be measured and evaluated separately under Task 2 of our Scope of Services. The results of that analysis will be provided under separate cover. PCA 207 includes mobile home and manufactured home types, some of which have one dwelling per parcel and some of which have multiple dwellings per parcel. Only those with one dwelling per parcel were included in the population for this sample. Those with multiple dwellings per parcel are considered multi-family properties and their impervious area will be measured under Task 3 of our Scope of Services.

The sample size was selected to provide 95% confidence that the ERU value is within 5% of true value (margin of error) and is representative of the population of the City's SFR properties. We also performed a visual and tabular review of the resultant sample properties to verify that they encompassed a representative range of geography, structure age, and housing type. In some cases, an original randomly selected sample property was obscured by vegetation and could not be accurately measured. In these cases, the analyst removed the obscured parcel from the review and replaced it with an additional randomly selected parcel. The final sample list is attached as Appendix A, and a map of the final, measured sample parcels throughout the City is shown below in Figure 1. The final, measured sample of SFR property types are highlighted in red, while other parcels are in blue. Please note that some parcel identification numbers (PIN) are duplicated, as parcels within the PCA 207 group have identical PIN numbers if they are within the same development and are distinguished in the tax parcel data by lot codes. Lot codes for those parcels are also provided in Appendix A.

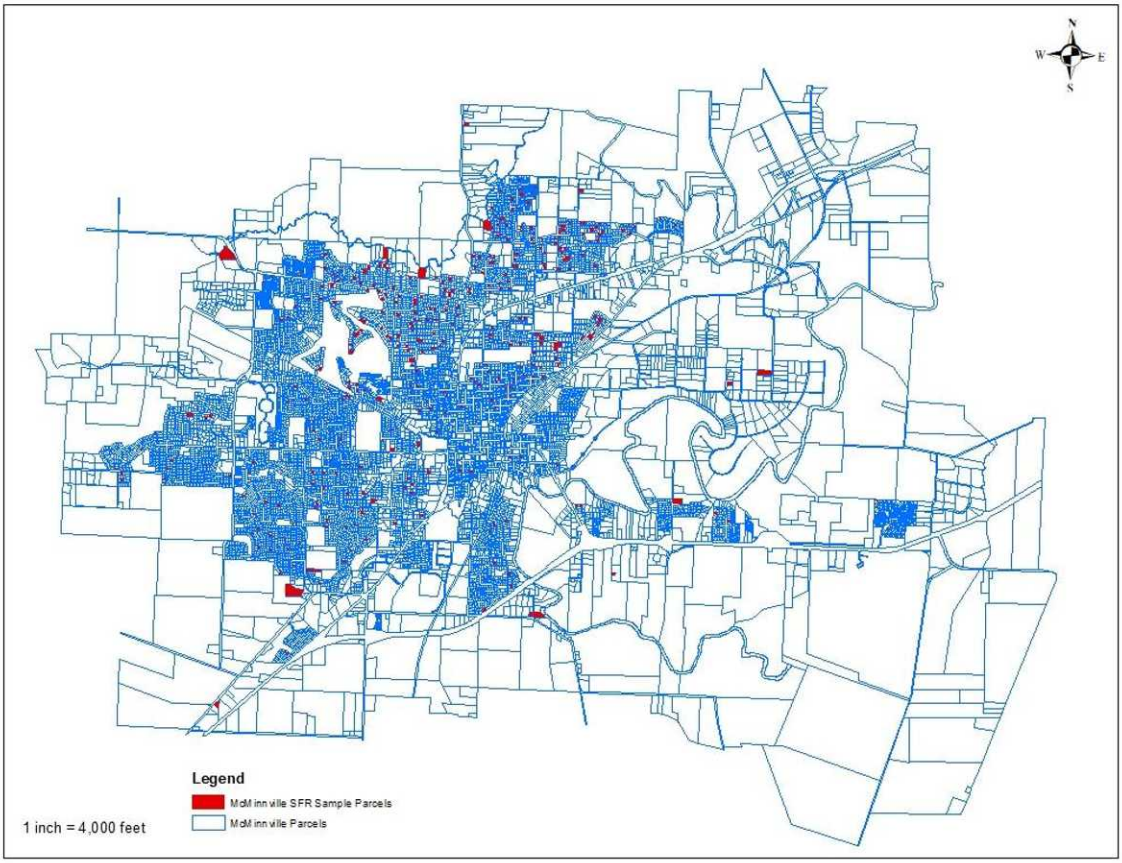


Figure 1. City of McMinnville Sample Distribution

Using ArcGIS, overlaying parcels on top of 2022 aerial imagery, the analyst created new spatial features to represent the impervious area on each property based on visual assessment of the property and met the definition of "impervious". Impervious area was defined as "hard surfaces that don't allow infiltration of stormwater into the ground." Examples of impervious surface include rooftops, driveways, patios, private sidewalks, parking lots and compacted gravel. Swimming pool water, railroad ballast, open graded aggregate and landscaping gravel are not considered impervious surfaces. The impervious area polygons were created to match the footprint on the ground of these surfaces, rather than rooflines which may be obscured by the angle of the aerial photography.

Figure 2 provides a selection of digitized SFR property types. The sample property is outlined in bright green, the impervious area features created by Raftelis are translucent yellow. Per the impervious surface definition, swimming pools and landscaped areas are excluded, and outbuildings, if any, are included.

Figure 2. Example of SFR Properties' Impervious Area Digitization (photos not at the same scale)

ERU Results

Raftelis' 400 sampled parcels had a wide range of impervious area amounts, from a minimum of 658 square feet to a maximum of 15,970 square feet. Raftelis recommends using the median value of impervious area on SFR properties to calculate the ERU. Compared with the mean (average) impervious area, the median is more statistically robust, and less sensitive to outliers, the very small or very large impervious surface amounts in the sample, and therefore a more accurate representation of typical SFR impervious area within the City. Based on the median value, the ERU value for McMinnville is 3,512 square feet of impervious area. The distribution of sampled impervious area for the sample, with the median demarcated, is shown in Figure 3 below.

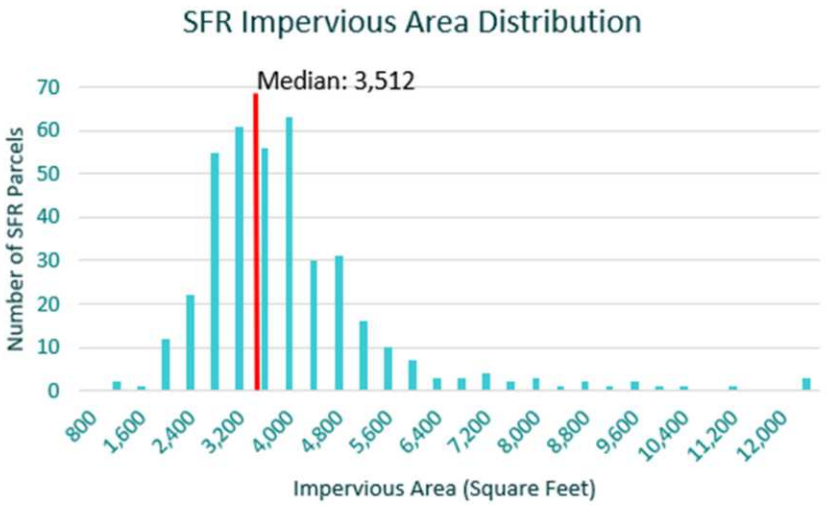


Figure 3. Impervious Area Distribution for SFR Properties in the McMinnville ERU Sample

Benchmarking

At the request of the City, Raftelis compared the McMinnville ERU to the ERU values for other similarly sized stormwater utilities in the State of Oregon. The 2021 populations of these cities range from approximately 20,000 to 60,000, except for the City of Medford (~86,000) and the City of Bend (~102,000). Those values in comparison to the City's ERU value are provided in Figure 4 below.

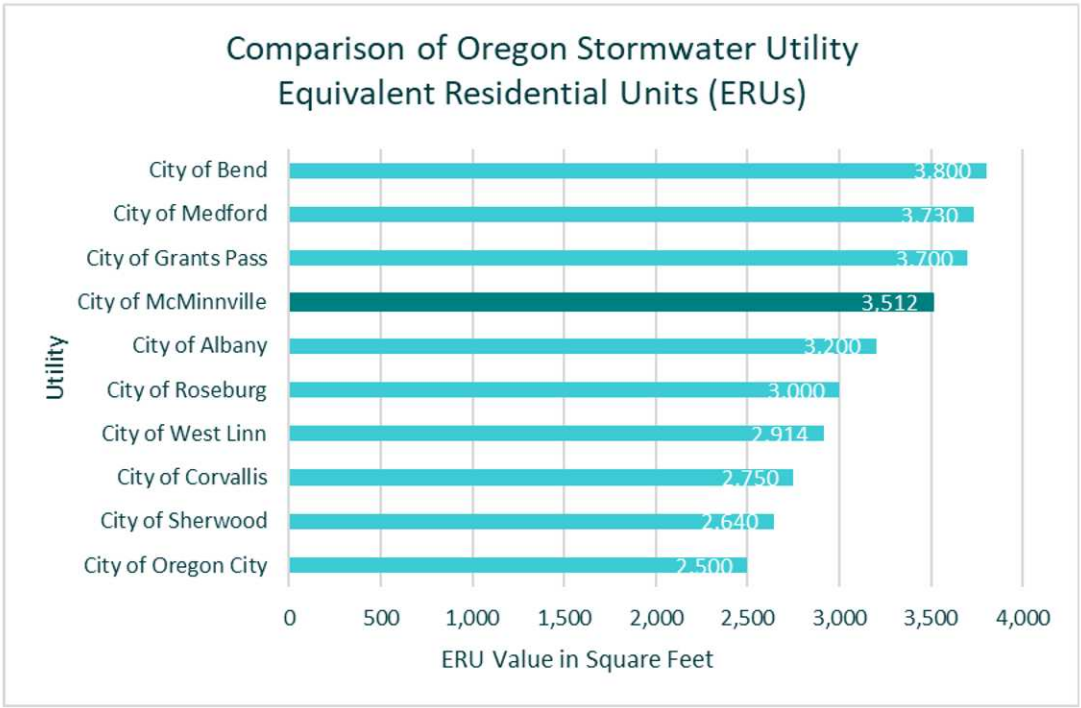


Figure 4. Comparison of ERU Values in Oregon Stormwater Utilities

Appendix A
Final SFR Sample Parcel ID Number and Lot Numbers

Parcel Identification Number	Lot Code
R4409 00700	
R4409 02000	Lot 92
R4409 02000	Lot 1
R4409 02000	Lot 39
R4409 02000	Lot 31
R4409 02000	Lot 85
R4409 02000	Lot 82
R4409 02000	Lot 77
R4409 02000	Lot 75
R4409 02000	Lot 26
R4409 02000	Lot 12
R4409 02004	
R4409CA04700	
R4409CA04800	
R4409CA05600	
R4409CA05700	
R4409CA10000	
R4409CA11500	
R4409CA12200	
R4409CA13000	
R4409CA14100	
R4409CA14800	
R4409CA15200	
R4409CA18300	
R4409CA19900	
R4409CA20500	
R4409CA21500	
R4409CB02500	
R4409CB04300	
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R4416BB06000	
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