Howard County, Maryland Watershed Protection and Restoration Fund Annual Report to the County Council March 1, 2019



Office of Community Sustainability Department of Public Works Department of Finance

www.cleanwaterhoward.com

FY 18 Watershed Protection and Restoration Fund Report

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1. Background

Since 2013, Howard County has collected a Watershed Protection and Restoration Fee for both residential and non-residential properties. The Fee amounts have not changed during this time, with the exception of adjustments to the Assistance Program through CR 37-2016 which determines the point at which the Fee is considered a hardship for non-residential properties.

The County works closely with residents on a daily basis to implement stormwater practices in their yards and provide education and outreach through several departments and a variety of programs. The Office of Community Sustainability kicked off a pilot commercial program with a successful partnership with WalMart to retrofit the Ellicott City WalMart's stormwater pond in 2018. This type of retrofit utilizes a new state-of-the-art technology based system and requires minimal machinery and disturbance to the ecosystem during construction. Utilizing telemetry based forecasts, the pond is able to be drained ahead of a large storm event in order to capture an increased volume of water. Capturing more, or all, of the water volume from the storm event, prevents an initial large flush of water and associated contaminants, from flowing out of the pond overflow to the stream during large rain events. This retrofit also provides some flood control at the headwaters of the Tiber Hudson Watershed. We anticipate this successful partnership to serve as a model for future commercial partnerships going forward.



Image: Green heron in the WalMart stormwater pond during the retrofit

Watershed Protection and Restoration Fee Program Fundamentals

Fee Calculation

Residential Fee

Condo and Townhome -\$15 per unit Single Family Home .25 acres or less - \$45 Single Family Home greater than .25 acre - \$90 Apartment Complex - \$15 per unit Mobile home park - \$15 per unit

Residential Hardship

60% credit if household income is less than 2.5 times the poverty level.

Commercial Fee

Calculated based on impervious surface area in units of 500 square feet.

Fee = Number of Units x \$15

Commercial Cap

Per CR37-2016, the percentage of the total tax bill that deems the fee a hardship in FY18 is 10%.

If the fee is greater than 10% of total tax bill then pay 10% of tax bill.

If after the 10% adjustment the fee is greater than \$1,000 and owner proves financial hardship then fee maximum is \$1,000.

Non-Profit Partnership

If an organization enters into the partnership Memorandum of Understanding (MOU) with the County agreeing to allow the County to assess treatment options to the maximum extent practicable (MEP), and agrees to implement the identified practices, then 100% of the fee is credited.

Need-based grants are available to assist with, or fully cover, the cost of implementing practices.

If an organization does not agree to MOU or later opts out of the partnership, then the fee is calculated at the regular commercial rate.

Agricultural Assessments

Billed at the residential rate of \$90 if property has a Howard County Soil Conservation District (HCSCD) Soil Conservation and Water Quality Plan or owner has signed MOU agreeing to pursue Conservation Plan or a Forest Conservation Management Plan through the Maryland Department of Natural Resources.

Without a Conservation Plan, agricultural property is billed at the \$15/500 ft² commercial rate. The commercial cap is applicable to agricultural properties.

Credits

The credit program was revised per CR 37-2016

Residential

Credits are calculated as a percentage of the fee equivalent to the percentage of impervious area treated by the stormwater practice up to a maximum of 100%.

Commercial

Credits are calculated as a percentage of the fee equivalent to the percentage of impervious area treated by the stormwater practice up to a maximum of 100%.

Parcels with SDPs of 2003 or newer must certify that all stormwater management systems are in place and functional as designed according to the MDE design manual and approved plans.

Older parcels are eligible for a credit as a percentage of the fee equivalent to the percentage of impervious area treated to current standards in the MDE design manual, typically above what was required at the time of development.

Non-profit

For nonprofit properties that do not participate in the MOU program, the percentage credit is awarded equivalent to the stormwater treated on-site according to the commercial crediting guidelines above.

Reimbursements

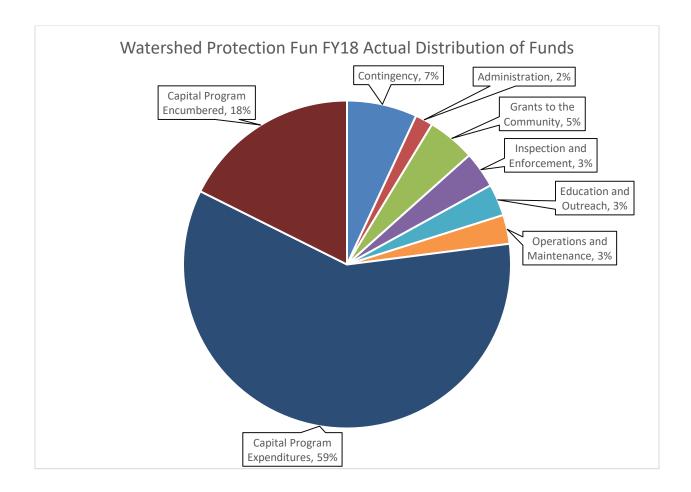
One-time reimbursements for costs incurred for the construction or implementation of additional stormwater practices are available for all properties. The practices accepted, the minimum criteria required, and the reimbursement rates will vary and are defined by County Council Resolution.

CR 16-2017 allowed for the addition of Septic Pumping to the approved reimbursement options. The Septic Savers program was established, incentivizing homeowners to engage in regular septic maintenance. Since the program began in spring of 2017, 1475 residents participated and each received \$100 reimbursements for their septic pumping before the end of FY18.

2. Watershed Protection and Restoration Fund Report as required by Environment Article of the Maryland Code, subsection 4-202.1 (i)

The information provided below is the actual distribution of funds of the Howard County WPRF required under the Maryland Environmental Article of the Maryland Annotated Code.

The fiscal reporting year ended on June 30, 2018. For Fiscal Year 2018, 96,527 properties were subject to WPRF. The amount deposited to the fund was \$11,287,317.99.



3. Financial Data

Fee Collection – provided by Howard County's Department of Finance

\$11,287,317.99 - Imposed overall fee for FY 2018
\$408,237.52 - Total of 587 Credits for FY 18
\$30,177.64 - Amount still due for the FY 18 billings

Personnel Complement Funded by the Watershed Protection and Restoration Fund FY18

Office of Community Sustainability – 2.5 positions

- Planning Supervisor
- Planning Specialist I (x1.5)

Department of Public Works, Stormwater Management Division – 3 positions (3 vacancies)

- Engineering Specialist III
- Regulation Inspector II
- Regulation Inspector I

Department of Public Works, Highways – 4 positions

- Motor Equipment Operator II
- Motor Equipment Operator I (x3)

Comprehensive Annual Financial Report Fiscal Year 2018

Howard County, Maryland Combining Statement of Net Position Non-Major Enterprise Funds June 30, 2018

Special Watershed Recreation Protection Broadband Facility and Restoration Total ASSETS Current assets: 3,649,691 \$ 12,896,766 16,546,457 Equity in pooled cash S s S Receivables: Service billings 133,146 133,146 22,056 93.674 115,730 Other receivables Restricted assets: 560,000 Equity in pooled cash and cash equivalents 560,000 **Total current assets** 3,782,837 653,674 12,918,822 17,355,333 Noncurrent assets: Restricted assets: Other receivables 1,256 6,860 8,116 _ Capital assets: Land 8,684,896 8,684,896 Buildings and improvements, net 2,663,313 183.037 2.846.350 Machinery and equipment, net 886,773 25,137 887,903 1,799,813 11,395,476 11,395,476 Infrastructure, net Total noncurrent assets 12,283,505 11,373,346 1.077.800 24,734,651 16,066,342 12,027,020 13,996,622 42,089,984 Total assets DEFERRED OUTFLOWS OF RESOURCES Deferred refunding amount 34.686 34.686 Total deferred outflows of resources 34,686 34,686 Total assets and deferred outflows of resources 16,066,342 13,996,622 42,124,670 12,061,706 LIABILITIES **Current liabilities:** Due to other funds 2,713,897 2,713,897 Accounts payable 1,650 125,615 100,476 227,741 Accrued wages and benefits 70,077 28,405 41.672 **Total current liabilities** 30,055 2,839,512 142,148 3,011,715 Current liabilities payable from restricted assets: 497,000 497,000 Note payable Total current liabilities payable from restricted assets 497.000 497.000 30,055 142,148 Total current liabilities 3,336,512 3,508,715 Noncurrent liabilities: **Compensated** absences 36,045 36,045 Refunding revenue note payable 2,217,000 2,217,000 LT Bond Payable 2,543,782 2,543,782 Total noncurrent liabilities 2,543,782 2,217,000 36,045 4,796,827 8,305,542 **Total liabilities** 2.573.837 5,553,512 178,193 NET POSITION 1,070,940 Net investment in capital assets 9,738,467 8,694,032 19,503,439 Restricted: For debt service 560.000 560.000 Unrestricted 3,754,038 (2,745,838) 12,747,489 13,755,689 13,492,505 33,819,128 6,508,194 13,818,429 **Total net position** s \$ S \$

The accompanying notes are an integral part of these financial statements.

SWM Division Projects Charged to Watershed Protection and Restoration Fund			
Purchase Order Date	Project	Description	FY18 WPR Fund Spent
5/28/2014	Woodlot Road Stream Design	Stream restoration design	\$9,365.08
1/8/2015	Pinehurst Court Stream Restoration Construction Management Services	Stream restoration construction management	\$-
10/19/2015	Davis Branch Design	Stream restoration design	\$-
12/17/2015	Bonnie Branch Stream Construction	Stream restoration construction	\$-
12/28/2015	Longmeadow Pond 1 - Construction Management	Repair/replace existing pond riser/barrel – construction management	\$3,632.23
1/28/2016	Twin Oaks Repair Design	Repair/replace existing pond riser/barrel – design	\$5,638.41
1/28/2016	Garand Drive Retrofit Design	Repair/replace existing pond riser/barrel – design	\$-
2/18/2016	JHU-APL Stream Tributary Design	Stream restoration design	\$352,602.00
3/1/2016	Char Lil Ct (SR48/SR47) Design	Stream restoration design	\$-
3/17/2016	Bonnie Branch - Construction Management	Stream restoration construction management	\$1,849.88
3/21/2016	Linden Chapel Construction	Repair/replace existing pond riser/barrel – construction	\$-
4/11/2016	Woodmark Community Pond Design	Repair/replace existing pond riser/barrel – design	\$201,912.88
5/23/2016	Ellicott City Retaining Wall 9A & B Design	Retaining wall design	\$1,978.72
5/23/2016	Ellicott City Retaining Wall 8A & B Design	Retaining wall design	\$1,192.33
5/26/2016	Cherry Creek Repair Construction	Stream restoration construction	\$-
6/1/2016	Dunloggin-Plumtree (SR49) Design	Stream restoration design	\$167,244.80
6/1/2016	Database Deployment and Templates	Deployment for state-required database	\$12,593.00
6/9/2016	Long Meadow II Construction Management	Repair/replace existing pond riser/barrel – construction management	\$1,410.90

6/19/2016	Velvet Path Construction Management	Repair/replace existing pond riser/barrel – construction management	\$13,465.85
6/28/2016	Long Meadow II Construction	Repair/replace existing pond riser/barrel – construction	\$-
7/19/2016	READY FY17 - Invoice #1	Payment to READY program/Howard EcoWorks	\$200,000.00
7/25/2016	Murray Hill 2 Construction Management	Repair/replace existing pond riser/barrel – construction management	\$16,859.82
7/27/2016	Garand Drive Constructability Review	Repair/replace existing pond riser/barrel – constructability review	\$-
7/28/2016	Deep Earth Lane Construction	Repair/replace existing pond riser/barrel – construction	\$-
8/2/2016	Murray Hill 2 Construction	Repair/replace existing pond riser/barrel – construction	\$-
8/9/2016	Portfolio Task Management	Database development for project management tracking	\$4,610.65
8/9/2016	Deep Earth Lane Retrofit Construction Management	Repair/replace existing pond riser/barrel – construction management	\$539.27
8/23/2016	Velvet Path Construction	Repair/replace existing pond riser/barrel – construction	\$-
8/23/2016	Patuxent/Patapsco Watershed Assessments - KCI Concepts	Conceptual design of projects in watershed assessments	\$-
8/23/2016	Patuxent/Patapsco Watershed Assessments - Biohabitats Concepts	Conceptual design of projects in watershed assessments	\$-
9/6/2016	Lynwood Manor Retrofit Construction (F94-029)	Repair/replace existing pond riser/barrel – construction	\$-
9/30/2016	Diversified Lane Design	Repair/replace existing pond riser/barrel – design	\$51,661.69
9/30/2016	Red Hill 2 Restoration Design	Stream restoration design	\$15,607.60
10/1/2016	Corps Flood Proofing Study	Flood proofing study for Ellicott City	\$-
10/31/2016	Longview Drive Stream Design	Stream restoration design	\$57,540.16
10/31/2016	Woodstock Park (Davis Branch) Construction Management	Stream restoration design	\$17,341.68
11/15/2016	Ellicott City Retaining Wall 1A Design	Retaining wall design	\$88,102.31

11/16/2016	Ellicott City Wall Design - Precious Gifts	Retaining wall design	\$20,496.11
11/21/2016	Ellicott City Wall Design - Lot E NE Corner	Retaining wall design	\$-
11/29/2016	Dobbin Road Construction	Stormwater retrofit design	\$683,183.19
11/29/2016	Rockburn Branch Park Construction Management	Stream restoration construction management	\$10,484.58
12/1/2016	Linden Chapel Construction Management	Repair/replace existing pond riser/barrel – construction management	\$5,892.27
12/2/2016	Rockburn Branch Park Construction	Stream restoration construction	\$13,166.14
12/2/2016	Woodstock Park (Davis Br) Construction	Stream restoration construction	\$-
12/9/2016	Timbers of Troy Stream - Design	Stream restoration design	\$39,775.46
12/14/2016	Howard Community College Construction	Stream restoration construction	\$-
12/14/2016	Park Drive Stream - Design	Stream restoration design	\$96,897.71
12/14/2016	Howard Community College Stream Construction Management	Stream restoration construction management	\$1,319.82
12/15/2016	CIS Update - Patapsco/Patuxent Results	Updates to the Countywide Implementation Strategy	\$42,478.51
1/11/2017	Mellen Court Stream and Outfall Stabilization Design	Stream restoration design	\$146,387.08
1/18/2017	READY FY17 - Invoice #2	Payment to READY program/Howard EcoWorks	\$-
1/23/2017	Golden Star 2 Construction	Repair/replace existing pond riser/barrel – construction	\$5,001.45
1/23/2017	Parking Lot E - Corner Wall - Construction	Retaining wall construction	\$-
2/1/2017	Murray Hill 2 Constructability Review	Repair/replace existing pond riser/barrel – constructability review	\$-
2/3/2017	Garand Drive Retrofit Construction	Repair/replace existing pond riser/barrel – construction management	\$552,015.21
2/10/2017	Deep Earth Final Payment - PO previously closed	Repair/replace existing pond riser/barrel – construction	\$4,150.00
2/15/2017	Lot E/Lot F Wall - Construction	Retaining wall construction	\$-
2/15/2017	Lot E/Lot F Wall - Construction Management	Retaining wall construction management	\$3,298.50

2/21/2017	Dunloggin - Plumtree - Construction	Stream restoration construction	\$794,731.43
2/21/2017	Dunloggin-Plumtree - Construction Management	Stream restoration construction management	\$49,690.33
2/21/2017	Hi Ho Silver Wall Construction	Retaining wall construction	\$-
2/24/2017	Woodlot Stream Construction	Stream restoration construction	\$499,997.65
3/2/2017	Heatherland Construction	Stream restoration construction	\$333,778.05
3/22/2017	READY FY17 - Invoice #3	Payment to READY program/Howard EcoWorks	\$54,824.69
4/26/2017	Red Hill 2 Printing	Stream restoration printing	\$-
5/3/2017	Precious Gifts Construction	Retaining wall construction	\$261,080.78
5/4/2017	Garand Road Construction Management	Repair/replace existing pond riser/barrel – construction management	\$44,609.01
5/15/2017	8659 Main St (Sexton) - Design	Retaining wall design	\$70,946.62
6/1/2017	READY FY17 - Invoice #4	Payment to READY program/Howard EcoWorks	\$-
6/2/2017	Heatherland Construction Management	Stream restoration construction management	\$107,406.01
6/26/2017	Gerwig Lane - Extra Geotechnical Work	Repair/replace existing pond riser/barrel – design	\$29,034.85
7/3/2017	READY FY18 - Invoice #1	Payment to READY program/Howard EcoWorks	\$200,000.00
7/24/2017	Brentwood Manor Retrofit Design	Stormwater retrofit design	\$62,606.01
8/1/2017	Font Hill Design-Build Project	Stream restoration design-build project	\$300,000.00
8/9/2017	Woodcrest Drive (LNB-BC- D004, F-91-002, 510) - Design	Stormwater retrofit design	\$123,765.06
			\$116,090.09
8/15/2017	Cherry Tree Farms Stream Design	Stream restoration design	\$81,972.18
8/15/2017	Davis Branch Year 1 Monitoring	Stream restoration monitoring	\$17,726.08
8/16/2017	3505 Font Hill Construction (Pumparound)	Stream restoration construction	\$16,294.12
8/16/2017	Garand - Verizon Work	Repair/replace existing pond riser/barrel – construction	\$-
8/16/2017	West End Diversion Pipe Design	Stormwater retrofit design	\$177,481.38

8/18/2017	Rockburn Branch Park Year 1 Monitoring	Stream restoration monitoring	\$19,866.20
8/18/2017	Pond T1 Design	Stormwater retrofit design	\$121,175.58
8/23/2017	Golden Star 1 Construction Management	Repair/replace existing pond riser/barrel – construction management	\$66,809.90
8/28/2017	Nottingham-Village Huntshire Drive Design	Repair/replace existing pond riser/barrel – design	\$73,828.87
8/29/2017	READY FY17 - Invoice #6	Payment to READY program/Howard EcoWorks	\$131.86
9/1/2017	Woodcrest Drive Stream (LNB-SR-F513) Design	Stream restoration design	\$80,650.71
9/8/2017	Dunloggin Middle School Stream As-Built	Stream restoration As-Built plans	\$14,043.13
9/15/2017	Ellicott View Pond - Opti - Design	Stormwater retrofit design	\$145,480.00
9/19/2017	Courthouse Drive Roadway Protection Design	Slope protection design	\$96,217.49
9/22/2017	Mayfield Manor Design	Repair/replace existing pond riser/barrel – design	\$72,587.57
9/28/2017	READY FY18 (cover D1164)	Payment to READY program/Howard EcoWorks	\$125,923.93
9/28/2017	READY FY18 - Invoice 2	Payment to READY program/Howard EcoWorks	\$49,076.07
10/3/2017	POI Pilot and DAs	Stormwater data management of Points of Investigation (POIs) and Drainage Areas (DAs) for stormwater facilities	\$86,860.94
10/6/2017	Stonehouse Drive Plat Revision	Outfall Stabilization Plat Revision	\$11,880.30
10/6/2017	Governor Martin Outfall Final Design	Outfall stabilization design	\$78,361.16
10/6/2017	Patapsco Park Estates - Design	Repair/replace existing pond riser/barrel – design	\$75,107.95
10/17/2017	Beech Creek Construction Management	Repair/replace existing pond riser/barrel – construction management	\$58,903.51
10/20/2017	Terra Maria Pond Repair Design	Repair/replace existing pond riser/barrel – design	\$195,919.45
10/20/2017	Terra Maria Pond Repair - Engineering Oversight	Repair/replace existing pond riser/barrel – construction management	\$18,502.52
11/20/2017	Churchill Way Outfall Construction	Outfall stabilization construction	\$126,698.36

11/21/2017	Waiting Springs- Construction Management	Repair/replace existing pond riser/barrel – construction	\$23,040.16
12/21/2017	Woodlot Road Stream Construction Management	management Stream restoration construction	\$31,698.51
1/2/2018	Greenway-Southview Grant of Easement Plats	Drainage improvement plats	\$11,054.82
1/5/2018	Kings Meade 2 Construction	Repair/replace existing pond riser/barrel – construction	\$-
1/17/2018	Centennial Dam Riser Repair	Repair/replace existing pond riser/barrel – construction	\$4,354.20
1/27/2018	Kings Meade 2 Construction Management	Repair/replace existing pond riser/barrel – construction management	\$-
2/1/2018	EC Walls 8 and 9 Phase II	Retaining wall design	\$12,819.00
2/20/2018	Proudfoot Place Concept Study	Stream restoration concept study	\$9,552.39
3/19/2018	READY FY18 - Invoice 3	Payment to READY program/Howard EcoWorks	\$100,000.00
3/27/2018	Manors of Oakwood Design	Repair/replace existing pond riser/barrel – design	\$28,726.39
4/11/2018	Montgomery Run Pond 1 Design	Repair/replace existing pond riser/barrel – design	\$-
5/9/2018	Blue River Court Construction Management	Repair/replace existing pond riser/barrel – construction management	\$-
5/15/2018	Patapsco/Trinity Bioretentions	Water quality improvements design	\$-
6/5/2018	Blue River Court Construction	Repair/replace existing pond riser/barrel – construction	\$-
6/7/2018	Diversified Lane Construction	Repair/replace existing pond riser/barrel – construction	\$-
6/15/2018	Woodland Park Construction	Repair/replace existing pond riser/barrel – construction	\$-
6/18/2018	Ellicott Woods Pond Repair (Post Flood)	Pond repair – construction	\$49,279.09
6/18/2018	Woodland Park Construction Management	Repair/replace existing pond riser/barrel – construction management	\$-
6/27/2018	Governor Martin-Forest Conservation Funds	Repair/replace existing pond riser/barrel – forest conservation payment	\$9,801.00

		TOTAL	\$7,990,080.69
NOTES:			
•	sents WPRF expenditures an Watershed Fund was spen	nd breaks out the values by fiscal years. N t on the project in FY18.	No value means no
•	orders also have money allo orting solely the WPRF.	ocated from the General Fund and other	funding sources.



Image: WalMart pond after 2018 retrofit

4. Incentive Reimbursements and Credits

If stormwater best management practices (BMPs) are constructed on a property and meet the design criteria outlined by MDE, a reimbursement for costs up to 50% of the total (with a maximum amount) is given to the owner. An owner must fill out an application and the site is inspected for validation of design. There is a reimbursement program for both residential and non-residential property owners.

In addition, any property owner that has installed a BMP is eligible for a credit against the fee. For both residential and non-residential parcels this amounts to a credit as a percentage of the fee equivalent to the percentage of the impervious surface treated, according to the strictest MDE design standards.

Two residential credit programs exist – CleanScapes and Rain Gardens for Clean Water (RG4CW). The first RG4CW garden was installed in FY17 using a County hired contractor. RG4CW participants pay only 25% of the cost of the garden installation and materials and the County pays 75% through the contractor. RG4CW participants cannot receive additional reimbursement, but are eligible for credit.

Their impervious acres treated is noted under credits, not reimbursements. Also, important to note is, these participants do not actually "apply" for credit so the total number of credit applications will no longer increase in parallel to the number of credits granted.

Triennial inspections began in 2017 on the gardens installed at the onset of the CleanScapes program in 2014. Participants who applied originally only for reimbursement were notified that they could add credit if they wished and many opted to be reassessed for credit as well, however these participants also did not "apply" and were not added to the number of applications received. (Below data is for fiscal year 2018.)

2018 Residential Reimbursements	/	Total To Date (TTD)
 41 reimbursement applications received 35 reimbursements were granted (85.4%) \$18,739.23 total issued to property owners 0.96 impervious acres treated 	 	283 TTD 255 TTD \$123,770.14 TTD 4.9 TTD
2018 Residential Credits		
 11 Credit Applications received 6 Credits granted (66.6%) \$945.10 in credit issued 	 	85 TTD 140 TTD \$3,064.55 TTD
2018 Non-residential Reimbursements		
No applications were received	/	0 TTD
2018 Non-residential Credits		
Pre-2003 SDP		
• 0 Applied	/	22 TTD
O Approved	/	14 TTD
Post-2003 SDP		
O Applied	/	60 TTD
O Approved	/	55 TTD
 \$2,985 in credit issued 	/	not previously calculated

For agriculturally assessed properties a credit is awarded for any parcel that is managed by a Water Quality and Conservation Plan, prepared by the HCSCD; or a Forest Conservation Plan approved by the Maryland Department of Natural Resources (DNR).

• 969 Agricultural Properties are credited with Conservation Plans

Non-profit parcel owners are offered the opportunity to join in partnership with the County allowing the County to assess the potential for on-site impervious area treatment. If a property owner joins the partnership the fee is credited 100% beginning on the next billing cycle while they continue to participate in the Partnership and work toward implementing stormwater treatment and outreach. If the non-profit, at some point in the future, opts out of the partnership they will be charged the non-residential rate, currently \$15/500 ft² of impervious area.

- 203 non-profit partners are currently in the partnership, totaling 241 parcels (not counting individual Columbia Association parcels).
- 13 parcels require no further action as they are post-2003 SDP.
- \$2 million in contracts was awarded to two firms in early 2016 to design and build BMP's on non-profit partner properties which were all completed in FY18. These included 3 stormwater pond retrofits and a stream restoration.





5. Adjustments

As defined by the County Code, all parcel owners are entitled to submit a request for adjustment to the WPRF for one or more of the following reasons:

- Identification of the owner invoiced is in error
- Error regarding the impervious surface measurement for non-residential parcels
- Mathematical error in calculating residential lot size
- Mathematical error in calculating the fee on non-residential properties

There were no requests for adjustment in FY18.

- 0 request granted
- 0 request denied
- 0 appealed to the Board of Appeals

As expected, the number of adjustment requests remains low as community education increased and billing data errors were addressed.

6. Fee Assistance and Hardship

The Department of Finance administers a fee assistance program to aid residential property owners. Currently there are 208 Hardship Credits totaling \$7,164.

Hardship Credits criteria for non-residential property owners are defined under Section 20.1109 9(c).

7. Two-year Projections

For information regarding projections to show expenses, fee revenue, other revenue and fee adjustments, please see the Financial Assurance Plan.

8. Recommendations

- Consider a greater incentive program for commercial properties and continue to pursue implementation of strategies recommended by the Commercial Stormwater Solutions Work Group.
- Adjust the annual report to reflect fiscal year, rather than requesting calendar year which is not possible for most of the financial data.