FEASIBILITY
OF A
REGIONAL STORMWATER UTILITY DISTRICT
IN
ERIE AND NIAGARA COUNTIES

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Prepared for:
Western New York Stormwater Coalition

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Utility District

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Executive Summary

Thirty-nine municipalities, as well as the counties of Erie and Niagara are regulated Municipal Separate Storm Sewer System (MS4) owners. As MS4 owners, these communities have the responsibility of meeting New York State's (NYS) Phase II Stormwater regulations. Currently, these municipalities work together voluntarily under the Western New York Stormwater Coalition (WNYSC), sharing resources to create a stormwater management plan for each community that meets the NYS Phase II requirements.

Currently the WNYSC works well to assist the communities in meeting their stormwater requirements, but there are some limits on what the WNYSC can do. Specifically, the WNYSC is unable to provide the long-term funding mechanism for communities to ensure that they continue to meet the requirements of their stormwater management programs. Without long-term funding, there is a potential that some communities may end up violating conditions of the stormwater permit. Violation of these permits can be expensive with fines up to $37,500 per violation per day. In addition, Erie and Niagara Counties also have significant flooding and water quality issues. This feasibility study investigated whether a Stormwater Utility District (SUD) can help in mitigating these problems.

To address the MS4 permit requirement to establish long-term funding mechanisms for stormwater management, the WNYSC was awarded NYS Department of Environmental Conservation (DEC) grant funds to conduct a Phase 1 Feasibility Study to investigate the formation of a SUD for Erie and Niagara Counties. The Wendel team (Team) of:

- Wendel Duchscherer
- Malcolm Pirnie
- Advanced Design Group
- Bond, Schoeneck, and King
- Mustard Seed Consulting

was awarded a contract to provide this feasibility study. The feasibility study included data collection and analysis, financial analysis (costs and revenue), development of a potential organizational structure and legal analysis.

Data Collection and Analysis

To determine the feasibility of an SUD, data from each of the communities that are part of the WNYSC was collected. An information gathering form, created by the team with input from the Erie County Department of Environment and Planning (ECDEP) and the WNYSC, was utilized to make sure that consistent and complete datasets were collected from each of the 39 communities in the WNYSC. In addition, data was collected from three other entities with stormwater responsibilities (Erie County Department of Public Works, Niagara County, and Erie County Sewer District #6). These 42 responsible

entities were asked to provide information in the gathering form for a variety of items including stormwater infrastructure, stormwater financing, and stormwater operations.

The information gathering form was sent out to the each of the communities and a member of the Team contacted each community. Interviews were arranged to talk with each community about the form and the information they provided in the form. At the same time, the Team member asked the community representative more qualitative questions regarding the stormwater utility district to get information on how their community might react to the idea of an SUD.

37 of the 42 communities responded to the information gathering form and participated in an interview to determine their opinion of an SUD. It should be noted that the amount of available data varied significantly among the communities, although most communities had information about their stormwater infrastructure. There is a wide range of stormwater pipe lengths and number of catch basins amongst the communities in Erie and Niagara County. Some of the smaller villages and more rural towns have little stormwater infrastructure. The larger, denser, municipalities have extensive stormwater infrastructure. Also, the number of outfalls varies for each community.

Many communities had very little information on stormwater budgets. In most cases, the communities in the WNYSC do not have separate budgets for stormwater. The costs of stormwater are borne by several departments including highway, engineering, and other utilities.

Interviews with the stormwater administrator from each of the communities also provided important information. Most thought that the WNYSC has been beneficial and they could not see meeting the requirements of the stormwater regulations without the help of the coalition. They did have concerns about additional costs and fees for their residents and were worried about the potential union concerns surrounding the transfer of responsibilities to an SUD. 50% of the communities interviewed did not support a complete takeover of their stormwater program by an SUD. These communities wanted to keep ownership and control of their stormwater infrastructure.

Cost Estimation

It was difficult to get an accurate estimate of the costs because most municipalities do not account for stormwater system costs separately. Also, the amount of infrastructure was highly variable between municipalities. It was proposed that only the costs of operation and maintenance would be covered by the SUD since future capital costs for each of the communities is too variable. For instance, older communities will have higher capital costs due to the age of their system. Therefore, under the proposed SUD framework, capital costs for stormwater infrastructure are expected to be defined locally and paid for by the individual communities.

Using the data collected, an estimate of the base cost of operation and maintenance of the stormwater system for each community was calculated. Additional costs for the counties

and administration of an SUD were also included. Adding this all together leads to the following estimate of stormwater operation and maintenance costs for the SUD in order to meet the minimum permit requirements:

Community Stormwater Costs:	$ 7,808,000
Erie County Stormwater Costs:	$ 1,814,000
Niagara County Stormwater Costs:	$ 285,000
Adminstrative Costs:	$ 255,000

Total Costs:	$10,162,000

This cost estimate only covers the base costs of a stormwater program. This is considered a low level of service where the permit regulations will be met, but no extras will be provided. Higher levels of service would require more revenue, but will include many progressive aspects of stormwater management. Higher levels of service would aim to quickly and aggressively achieve full compliance with the existing MS4 regulations, while also preparing for future potential regulatory requirements.

The WNYSC communities would incur additional costs associated with creating a separate stormwater utility. These costs are estimated to be in the range of $400,000 to $800,000, including legal and consulting fees dependent on the organizational structure developed for the utility.

Revenue Projections

Based on experience with other SUDs, the primary way to fund such a district is a user fee. User fees must be fair and equitable to all; and as such, fee assessment methods must bear a direct relationship to the costs of service for a particular individual and not be used to simply generate revenue. The user fee should be based on parameters related to the quantity and quality of stormwater runoff generated by the actual users, to cover costs for managing stormwater within the region's watersheds.

The fee structure should also provide credits for property owners to design on-site stormwater management systems which reduce the contribution of stormwater to municipal systems. A typical fee structure would consider total impervious area and on-site management credits.

The portion of Erie and Niagara counties covered by the WNYSC consists of 39 communities with a total area of approximately 43.7 billion sq. ft. (1 million acres) with 416,851 parcels of land. A preliminary estimate of impervious or billable land area was analyzed using available county-wide records of lot sizes and building areas for all developed properties. Parcel information obtained for each of the municipalities included parcel types and land acres by land use category (residential, commercial, etc) and MS4 district. A sample set of properties was chosen to examine typical impervious areas. Of the total 43.7 billion square foot area for the region, approximately 1.2 billion square feet is assumed to be impervious.

Using this analysis of impervious area, a range of hypothetical, projected revenue was calculated based on the concept of an equivalent residential unit (ERU). The revenue generated under three base fee amounts ($3.00, $4.00, and $5.00 per ERU per month) with all communities participating provides projected revenue of $13.26 million to $22.1 million. These revenue estimates account for data uncertainties, a fee credit program, and collection delinquencies. The surplus (revenue estimated above existing costs) generated by the fee would be used to improve regional services, to address priority improvement needs, and to increase the level of service provided.

Organizational Structure

The SUD will be organized according to the responsibilities tasked to the SUD. The most important responsibility of an SUD for Erie and Niagara Counties is to generate funding for stormwater. Therefore, any SUD organization structure selected must have a method for collecting fees. A great majority of this money will then be returned to the individual communities to spend on their stormwater programs. The SUD will also be responsible for mitigating regional issues like flooding and water quality, while also offering the services that the WNYSC currently provides.

The SUD will not take over local control of the infrastructure or employees of the individual municipalities. It also will not enforce stormwater regulations, or make operational decisions for the municipalities.

An independent SUD, created through special legislation in NYS, is the logical choice for an organizational structure. Other options are limited in their ability to meet the responsibilities of the SUD.

The independent SUD will be structured following the existing WNYSC as a starting point. An executive leadership committee, staff, and representative body would be created and roles for these groups will be determined. Methods for assessing regional capital improvement projects will also need to be developed. A transition strategy to move from the WNYSC to the SUD will also be needed.

Legal Analysis

There is no definition of a stormwater utility district in New York law. The concept of a SUD is used in other states but the exact functions that it performs differ from jurisdiction to jurisdiction. Also, there is no good authority to establish a system of user fees to fund the activities of the regional SUD. In addition, there is no reliable mechanism within existing NYS law to place the regional SUD in charge of collecting those fees and distributing designated percentages of those fees to individual municipalities.

Given the limitations on existing authority and the ambiguities in other areas, the most direct route to the desired result is through the adoption of enabling state legislation.

The legislation could authorize the creation of an entity intended to serve as the regional SUD.

A decision must be made between legislation that is specific to the needs of the localities in this study and legislation that provides a more general framework for regional entities that will perform stormwater functions. If the legislation is going to handle a diverse set of circumstances that would arise for different municipalities throughout the State, the help of one of more of the municipal associations could be enlisted to seek such legislation.

Public Comment

Throughout the development of the feasibility report, the Team has worked to keep representatives of the MS4's involved in this project. In the early stages of the project, the feasibility of an SUD was discussed at numerous meetings of the Western New York Stormwater Coalition. More formal presentations of the feasibility study were given as power point presentations during two of the monthly meetings of the WNYSC. Public comments and questions were received at each of these meetings.

As the feasibility study neared completion, a power point presentation was developed to educate the municipal officials and general public on the feasibility of an SUD. A copy of that presentation is given in Appendix G. The WNYSC then asked each member of the coalition if they were interested in having the feasibility study presentation given to their public officials. Half of the communities in the WNYSC asked to have the presentation offered to their communities.

These meetings were helpful in explaining the idea of an SUD to the municipal officials and the public, but they did not change the public opinion on an SUD. The majority of the municipal officials and general public were against the formation of an SUD in Erie and Niagara Counties. The SUD was perceived as a new layer of government with increased fees and less local control. The benefits of mitigating regional flooding and water quality problems, providing long-term funding, and assisting the municipalities with meeting the requirements of the stormwater regulations through an SUD were not perceived to be large enough to offset the negatives.

Conclusions and Recommendations

Looking at all of the information provided in the previous sections, creating an SUD for Erie and Niagara Counties is feasible. The data collected shows that revenue generated by a nominal fee of $3.00/ERU/month can cover the costs of operations and maintenance of the stormwater system while also providing additional funding to address regional flooding and regional water quality concerns.

If the region decides to go forward with creating an SUD, it is recommended that the SUD be formed as a separate entity. Other organizational structures investigated lacked the flexibility to distribute funding back to the municipalities. The creation of a

stormwater utility district is new in New York State and presently is not covered by current laws. Therefore, new legislation will be needed for the creation of an SUD. However, it is expected that this legislation can be adopted as other areas of the State may also have a need for this legislation and would provide additional support.

The public meetings showed that there is not enough of a compelling need at this time to move forward with Phase 2 of the project. In the public meetings, communities supported the idea of an SUD, but could not support the new fees associated with a regional SUD. At this time, the communities will continue to work locally to operate and maintain their stormwater systems. Therefore, the Team will not move forward at this time to Phase 2 of forming an SUD.

At the onset of the feasibility study, there were three major needs that a dedicated source of funding through the formation of a utility district could address:

1. A dedicated source of funding at the local level to cover the cost of implementing the necessary programs to comply with the MS4 permit requirements;
2. Continued support for the WNYSC to continue to coordinate the public outreach, annual report template, trainings and other regional services that assist the MS4s in Erie and Niagara Counties with understanding and complying with the permit requirements; and
3. A committed funding source for capital improvement projects that could address regional flooding and water quality improvement needs.

Based on the comments and feedback provided regarding the feasibility study, the majority of the MS4s have opted to fund their individual stormwater permit programs at the local level. This will be accomplished from resources budgeted through municipal general funds or drainage districts and subsidized, in some cases, through fees. The political and public support for instituting an additional tax or fee structure to provide a separate, dedicated source for stormwater programs does not currently exist. It is recommended, however, that each of the MS4 communities ensure that they have adequate long-term revenue sources to fund the required stormwater management activities within their municipality.

Without the creation of a Stormwater Utility District, which would generate a committed source of funding for the WNYSC, MS4s will have to continue to rely on their annual dues and any grants the Erie County Department of Environment and Planning can obtain to support the coalition activities. The current annual rate may need to be raised, if the necessary grant funding is no longer available. Many comments were received from municipal representatives and elected officials during this study highlighting the success of the Coalition.

The availability of capital funding for flood mitigation and water quality improvement projects is limited and, due to the age of most local infrastructure, is at a high demand at the local level. The limited amount of funding raised at the local level for capital improvements is focused on local needs and priorities and is not available to invest in

projects that would produce regional stormwater benefits. Often these local capital investments address problems within a specific municipality by transferring the problem downstream to neighboring municipalities. Without a regional resource or authority such as a Stormwater Utility District, there is no established mechanism (other than the WNYSC, which is limited) to pool local resources and coordinate the implementation of regional efforts to address flooding and overall water quality issues.

It is recommended that the MS4 communities in Erie and Niagara Counties continue to work together through the WNYSC on stormwater management activities. It is also recommended that the MS4 communities continue to support the WNYSC and grant funding opportunities that fund Coalition staff and initiatives. The Coalition should continue to pursue opportunities to identify and create a committed and more dedicated source of funding for Coalition activities. The Coalition and MS4 communities should continue to look for grants and other ways to fund regional projects that will mitigate and address our priority flooding and water quality problems and concerns.

One idea for funding regional water quality and quantity improvement projects is setting up an alliance similar to the Finger Lakes – Lake Ontario Watershed Protection Alliance (FL-LOWPA). There are currently twenty five counties participating in the FL-LOWPA. The purpose of this alliance, which is governed by a regional Water Resources Board, is to protect and enhance water quality in the Lake Ontario Basin. The alliance promotes a coordinated watershed approach to foster partnerships and collaborative efforts to address priority regional water quality improvement needs. Through the New York State legislature and the Environmental Protection Fund (EPF), FL-LOWPA has received an annual line item budget of $2 million to support the efforts and programs of their member counties. Managed through the Water Resources Board, this dedicated source of funding provides the counties resources to implement projects that foster regional collaboration and address regional needs and priorities.

The creation of a Lake Erie – Niagara River Watershed Protection Alliance (LE-NRWPA) and the establishment of a similar dedicated funding source to assist in the protection of the Lake Erie -Niagara River Basin would provide a mechanism to fund efforts to address regional water quality resources and regional flooding concerns. It would also provide dedicated support for the WNY Stormwater Coalition, which needs to further pursue this approach with the NYSDEC and the State Legislature. Annual funding dedicated as a line item through the EPF would provide the support to address our compelling needs and foster the collaboration necessary to resolve our regional stormwater problems and protect our Great Lakes water resources.

A second round of federal funding through the Environmental Protection Agency's Great Lakes Restoration Initiative will be released soon. It is recommended that the WNY Stormwater Coalition and the Erie County DEP discuss partnering with the NYSDEC to apply for resources toward initial funding for a LE-NRWPA pilot program.

Section 1. Introduction

1.1 Background

Thirty-nine municipalities, as well as the counties of Erie and Niagara are regulated Municipal Separate Storm Sewer System (MS4) owners. As MS4 owners, these communities have the responsibility of meeting New York State's (NYS) Phase II Stormwater regulations. These regulations were enacted to meet US Environmental Protection Agency (EPA) regulations and to protect water quality in New York. Presently, these municipalities work together voluntarily as the Western New York Stormwater Coalition (WNYSC), sharing resources to create a stormwater management plan for each community that meets the NYS Phase II requirements.

Currently the WNYSC works well to assist these communities in meeting their stormwater requirements, however there are limits on what the WNYSC can perform. Specifically, the WNYSC is unable to provide a long-term funding mechanism for communities to ensure that they continue to meet the requirements of their stormwater management programs.

To address the MS4 permit requirement to establish long-term funding mechanisms for stormwater management, the WNYSC was awarded NYS Department of Environmental Conservation (DEC) grant funds to conduct a Phase 1 Feasibility Study to investigate the formation of a Stormwater Utility District (SUD) for Erie and Niagara Counties. The Wendel team (Team) of:

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was awarded a contract to provide this feasibility study. The results of this feasibility study are presented in the sections that follow.

1.2 Compelling Needs for the SUD Feasibility Study

It is important to explain why a feasibility study for an SUD was needed. As mentioned previously, one of the major reasons for a feasibility study is to investigate whether an SUD could provide long-term funding for stormwater management in Western New York. Without long-term funding, some communities may end up violating conditions of the stormwater permit. Violation of the permit can be expensive with fines up to $37,500 per violation per day.

Another important reason for an SUD is to assist with regional needs involving stormwater. Erie and Niagara Counties have regional needs that are either directly or indirectly influenced by stormwater management. Proper stormwater management has a

direct influence on flooding in Erie and Niagara County. More effective stormwater management in this region would lead to less flooding in the area. In addition, stormwater management can also improve water quality in the region since stormwater can contribute pollutants such as solids and bacteria that cause beach closures in the region. Increased stormwater management can assist in mitigating these water quality problems. In many cases, these flooding and water quality problems cannot be adequately solved within a Town, Village or City border. They are regional issues that require regional solutions. An SUD would provide a mechanism to begin addressing these regional issues.

To determine the regional flooding concerns and water quality issues in Erie and Niagara Counties, data from municipal interviews were used along with data collected during interviews with the NYSDEC, Erie County, and Niagara County. The list of flooding concerns and water quality concerns are given below.

1.2.1 Regional Flooding

Many streams in Erie and Niagara Counties cross municipal boundaries. Without regional efforts to control stormwater, flooding from these areas will continue. Examples of streams that could see improved flood control under a regional approach include:

- Buffalo River
- Buffalo Creek
- Cayuga Creek (in both Erie and Niagara County)
- Cazenovia Creek
- Scajaquada Creek
- Smokes Creek
- Slate Bottom Creek
- Rush Creek
- Woodlawn Creek
- Delaware Creek
- Muddy Creek
- Little Sister & Big Sister Creeks
- Ransom Creek
- Got Creek
- Black Creek
- Tonawanda Creek
- Bull Creek
- Bergholtz Creek
- Gill Creek
- Fish Creek
- Donner Creek

These creeks and streams have also been mapped and are presented in Figure 1.1.

1.2.2 Regional Water Quality Issues

The beaches in Erie County are closed occasionally due to water quality problems. These problems are caused, in part, by stormwater issues. Evans, Woodlawn, Bennett, Wendt, and Hamburg Beach in particular have water quality problems that could be caused by stormwater. Regional management of stormwater can help to reduce the water quality problems at these locations. These beaches have also been mapped and are presented in Figure 1.1.

Figure 1.1: Regional Flooding and Regional Water Quality Issues

1.3 Project Outline

To complete a feasibility study for the SUD, the following steps were followed:

1) **Data Collection and Review** Data was collected from each of the communities in the WNYSC to determine what was currently being completed under each stormwater program and catalogue available assets.
2) **Cost Estimation** Current and enhanced costs for the communities' stormwater management programs were estimated using the collected data.
3) **Revenue Projections** GIS parcel data and information on impervious area was used to determine the potential revenue that could be generated by the SUD. These revenue projections were then compared to the estimated costs to assess the financial feasibility of an SUD.
4) **Organizational Structure** A potential organizational structure of the SUD was developed.
5) **Legal Issues** The legal aspects of an SUD were analyzed.
6) **Public Participation** The elected officials in the Towns, Villages, and Cities that are members of the WNYSC and the public were encouraged to participate through a series of presentations on the results of the feasibility study. Their opinions and comments were used in determining whether the regional SUD concept is a good idea and whether there is enough compelling need in the region to move forward with an SUD at this time.

Each of these steps will be described in the sections of the report that follow. At the end of the report, conclusions and recommendations are provided.

Section 2. Data Collection and Review

To determine the feasibility of an SUD, data from each of the communities that are part of the WNYSC was collected. This data collection process was completed by first developing an information gathering form. Interviews of each community were completed using the information gathering form. The data was then reviewed and compiled.

2.1 Developing an Information Gathering Form

The data collection process began early in 2009 with the development of an information gathering form. This form was created by the Team with input from the Erie County Department of Environment and Planning (ECDEP) and the WNYSC. A copy of the form is provided in Appendix A. The information gathering form was created to make sure that consistent and complete datasets were collected from each of the 39 communities in the WNYSC. In addition, data was also collected from three other entities with stormwater responsibilities. These were the Erie County Department of Public Works, the Niagara County Department of Public Works, and Erie County Sewer District #6. Erie County Sewer District #6 was included as they provide stormwater services for the City of Lackawanna. These 42 responsible entities were asked to provide the following information:

- Stormwater piping length, by size;
- Length of stormwater ditches;
- Number of retention/detention ponds;
- Number of catch basins and manholes;
- Number of other stormwater treatment facilities;
- Stormwater management practices including maintenance records;
- Staff, equipment, and other resources used to manage and maintain stormwater;
- Budgets for the stormwater system (capital, operations, maintenance, other);
- Organizational structure for the stormwater system (staff and responsibilities);
- Summary of any outstanding bonds for the stormwater collection system; and
- Billing categories and basis of billing for the stormwater collection system

The information gathering form also requested data for the wastewater collection system infrastructure budgets, billing, and debt. In many communities, no budget, billing, or debt is broken out for stormwater infrastructure. Data on the wastewater collection system was used as a benchmark to which estimated stormwater costs in these communities was compared.

2.2 Community Interviews

Following approval of the information gathering forms by the ECDEP and the WNYSC, the information gathering form and a cover letter explaining the need for this information was sent out to the each of the communities. A member of the Team then followed up

with each community. Interviews were arranged to talk with each community about the form and the information they provided in the form. At the same time, the Team member asked the community representative more qualitative questions regarding the stormwater utility district. These questions included:

- What are the stormwater management goals of your community?
- Would you support a SUD in Erie and Niagara County?
- What could hamper the creation of an SUD in Erie and Niagara County?
- Why might you want to participate in an SUD?
- What level of centralization would you be comfortable with?
- For example, what do you think about centralized ownership of staff and equipment?
- What aspects of stormwater management would you like an SUD to complete for your community?
- What aspects of stormwater management would you not like an SUD to complete for your community?
- How do you feel about the idea of a stormwater utility fee versus an increase in taxes?

2.3 Data Review

37 of the 42 communities responded to the information gathering form and/or participated in an interview to determine their opinion of an SUD. The number of communities that responded represented 92% of the population and 89% of the land area within the MS4 regulated area. The data from each of the communities was compiled and the full dataset by community are provided in Appendix B.

In summary, it should be noted that the amount of available data varied widely among the communities. Most communities had information on their stormwater infrastructure. Some communities were able to provide exact information on length and size of stormwater pipe in their municipality using data from AutoCAD or ArcGIS. In other cases, the length of pipe was estimated based on the length of roadway in the community. A summary of this pipe data, along with data on catch basins and outfalls, is provided in Table 2.1.

Table 2.1: Stormwater System Properties in each community

Community	Length of Stormwater Pipe (ft)	Number of Outfalls	Number of Catch Basins
Village of Alden	28,516	29	
Town of Alden		22	
Town of Amherst	980,473	921	13,737
Village of Angola	38,050	25	68
Town of Aurora	36,960	8	
Village of Blasdell		17	
Town of Boston		90	
Buffalo Sewer Authority	59,400	208	
Town of Cheektowaga	616,720	479	5,689
Town of Clarence	400,000	59	2,500
Village of Depew		110	940
Village of East Aurora	264,000	55	1,100
Town of Eden	526,205	91	
Town of Elma	316,800	51	
Town of Evans		103	
Town of Grand Island	211,200	331	1,200
Town of Hamburg	555,500	116	3,820
Village of Hamburg	78,400	43	
Village of Kenmore		1	
City of Lackawanna (Erie Co. Sewer District #6)	264,000		
Village of Lancaster	135,835	47	
Town of Lancaster	549,120	175	1,101
Village of Orchard Park	79,200		522
Town of Orchard Park	857,261	218	4,519
Village of Sloan		3	
City of Tonawanda	136,854	98	
Town of Tonawanda	1,504,800	62	5,000
Town of West Seneca	521,689	278	5,745
Village of Williamsville		22	
Town of Cambria	11,134	6	37
Village of Lewiston		5	
Town of Lewiston	411,840	36	1,000
Town of Niagara		21	
City of Niagara Falls (Niagara Falls Water Board)	211,200	104	2,150
City of North Tonawanda	340,000	67	3,560
Town of Pendleton	186,441	65	219
Town of Porter		13	
Town of Wheatfield	801,400	213	850
Village of Youngstown	21,710	12	
Erie County	8,025,600	1,094	27,000
Niagara County	202,000	75	700

(blank records indicate that no data was collected for this property)

As shown in Table 2.1, there is a wide range of stormwater pipe lengths and number of catch basins in Erie and Niagara County. Some of the smaller villages and more rural towns have little stormwater infrastructure while the larger, denser, municipalities have extensive stormwater infrastructure. Also, the number of outfalls varies for each community. It should be noted that outfalls are defined as points where stormwater leaves a pipe and enters a natural body of water within the MS4 regulatory boundary, or leaves one MS4's system to tie into another MS4's system. Some municipalities have additional outfalls outside the MS4 boundary, but these are not included in the count provided.

Many communities had very little information on stormwater budgets. In most cases, the communities in the WNYSC do not have separate budgets for stormwater. The costs of stormwater are borne by several departments including highway, engineering, and other utilities. Due to this fact, stormwater budgets for communities were estimated when needed. The method for estimating these stormwater budgets is presented in the section on cost estimation.

2.4 Interview Analysis

As discussed earlier, the Team also interviewed the stormwater administrator from each of the communities. Based on the questions and other topics related to the formation of an SUD, the following common themes emerged:

- The WNYSC has been a good thing – they could not see meeting the requirements of the stormwater regulations without the help of the coalition.
- An SUD may help in getting funding and grants for their stormwater programs.
- They do not want to see an increase in costs/fees for residents and businesses.
- There would be union concerns with an SUD if jobs are eliminated.
- Another layer of government is not wanted.
- Residents will be concerned about their money being spent in other communities.
- Would different standards among the communities still be allowed by an SUD?
- Sharing equipment might be a good idea, but how would you share the costs and make sure that the equipment is operated properly to avoid breaking things.
- How do you handle fees with different sized communities and different ages of infrastructure?
- Response time in emergencies was a concern.

The community representatives were also asked what they thought about the idea of an SUD. The responses were varied and broken down in the following fashion:

- 17% of the communities interviewed supported a complete takeover of their stormwater program by an SUD.
- 50% of the communities interviewed did not support a complete takeover of their stormwater program by an SUD. These communities wanted to keep control of their stormwater infrastructure.
- 5% of the communities were not sure how they felt about an SUD.
- 28% of the communities interviewed had no response on this issue.

These community interviews have been summarized and are presented in Appendix C.

Section 3. Cost Estimation

To study the feasibility of an SUD, it is important to analyze the cost of the stormwater services that would be provided under an SUD. In this section, the data available is analyzed, the methodology for estimating costs is presented, and a base program cost is given. An estimate of what could be done if additional costs were incurred is also provided along with costs associated with initial development of an SUD.

3.1 Analysis of Available Cost Data

As mentioned in the data collection section of this report, it was difficult to get an accurate estimate of the costs because most municipalities do not manage stormwater system costs separately. Also, the amount of infrastructure is highly variable between municipalities.

Based on the responses gathered during the interview phase and results of meetings with the WNYSC, it was determined early in this project that only the costs of operation and maintenance (O&M) would be covered by the SUD since capital costs for each of the communities is too variable. For instance, older communities will have higher capital costs due to the age of their system. Therefore, under the proposed SUD framework, capital costs for stormwater infrastructure will still be defined locally and paid for by the individual municipalities.

Table 3.1 summarizes the stormwater costs for eight selected study area communities. It should be noted that only eight of the 39 communities are presented here, as they were the only communities that provided an estimate of their current stormwater program costs.

Table 3.1: Stormwater Service Costs for Eight Municipalities in Erie & Niagara Counties

Community	Operations & Maintenance	Capital Costs	Total
Village of Orchard Park	$40,000	$0	$40,000
Town of Cambria	$141,000	$0	$141,000
Town of Wheatfield	$144,000	$96,000	$240,000
Town of Hamburg	$395,000	$5,000	$400,000
Town of Clarence	$400,000	$0	$400,000
Town of Tonawanda	$363,201	$163,400	$526,601
Town of Cheektowaga	$434,575	$215,800	$650,375
Town of Amherst	$2,541,600	$2,645,000	$5,187,100

3.2 Methodology Used to Estimate Costs

This data was used to develop the methodology employed to estimate the stormwater system operation and maintenance costs for all of the municipalities that would be part of the SUD. The following formula, which best fit the data, was developed:

Community Stormwater Cost (for O&M) =
$80,000 + $4.50 x (Population of the Community)

This formula is comprised of two important elements:

1. **Fixed base cost.** This fixed base cost ($80,000) represents an estimate of the minimum cost of administering a stormwater management program that meets the permit requirements.
2. **Multiplier.** This is based on the population of the community. Using the data collected, it was found that stormwater operation and maintenance program costs are directly related to the population of the community. Adding this second component afforded a more accurate estimate of the stormwater costs for each community.

Our Team feels that this formula is a reasonable estimate of the stormwater management costs for the region for this level of study. Given the amount of cost information available, it may not be an exact estimate for each individual municipality, but is appropriate on a regional basis. If a Phase 2 study is completed, a much more detailed analysis of cost will need to be developed.

3.3 Base Program Cost Estimate

Based on the formula provided, an estimate of the O&M cost for each community was calculated. A summary of the estimated O&M costs are provided in Table 3.2.

Table 3.2: Estimated O&M Costs for each Community

Community	Estimated O&M Costs
Town of Alden	$114,975
Village of Alden	$91,948
Town of Amherst	$577,186
Village of Angola	$90,156
Town of Aurora	$112,819
Village of Blasdell	$92,181
Town of Boston	$115,392
Buffalo Sewer Authority	$1,391,559
Town of Cambria	$104,170
Town of Cheektowaga	$434,000
Town of Clarence	$197,075
Village of Depew	$154,526
Village of East Aurora	$109,906
Town of Eden	$116,194
Town of Elma	$130,661
Town of Evans	$148,695
Town of Grand Island	$163,454
Town of Hamburg	$274,618
Village of Hamburg	$125,337
Village of Kenmore	$153,616
City of Lackawanna	$165,439
Town of Lancaster	$180,650
Village of Lancaster	$130,141
Town of Lewiston	$140,395
Village of Lewiston	$92,464
Town of Niagara	$120,237
Niagara Falls Water Board	$329,151
City of North Tonawanda	$229,070
Town of Orchard Park	$189,098
Village of Orchard Park	$94,763
Town of Pendleton	$107,114
Town of Porter	$102,243
Village of Sloan	$96,918
City of Tonawanda	$152,317
Town of Tonawanda	$356,650
Town of West Seneca	$285,799
Town of Wheatfield	$143,129
Village of Williamsville	$104,976
Village of Youngstown	$88,771
Combined Total	$7,807,793

Additional costs for the Counties and administration of an SUD were also added. Stormwater costs incurred by Erie and Niagara Counties were added to the estimate as both Counties must meet the requirements of the MS4 permit. As part of this study, stormwater costs for each County were estimated and are summarized as follows:

- Erie County estimated their stormwater costs as $1,814,000 for operations and maintenance.
- Niagara County estimated that their stormwater costs were $285,000.

In addition, a labor estimate for staff members to administer the stormwater program was added to get a complete estimate of the costs that would be incurred by the SUD to meet the minimum MS4 permit requirements. A cost of $255,000 was used for administration. The existing cost of the Erie County DEP staff who work on WNYSC activities was used to arrive at this estimate.

A summary of these values provides the following estimate of stormwater costs for the SUD in order to meet the minimum permit requirements:

Community Stormwater Costs:	$ 7,808,000
Erie County Stormwater Costs:	$ 1,814,000
Niagara County Stormwater Costs:	$ 285,000
Adminstrative Costs:	$ 255,000

Total Costs:	$10,162,000

To confirm that these costs were reasonable, a comparison with operations and maintenance costs determined in the Long Island Sound Watershed Intermunicipal Council (LISWIC) study was made. This LISWIC study investigated the feasibility of a regional stormwater management district in Westchester County, NY. In this study, operations and maintenance costs of $3,500,000 were determined. This was a much smaller district (12 communities), so a comparison needed to be made based on population. On a per capita basis, the LISWIC costs were equivalent to $12.40 per person. In the proposed Erie and Niagara County SUD, the per capita cost would be $9.70 per person. These costs are similar, demonstrating that the estimated costs assumed for the Erie and Niagara County SUD are reasonable.

3.4 Levels of Service

Level of Service is defined as the list of services and targets that the SUD will attempt to meet on an ongoing basis. For this report, three different levels of service will be considered: low, medium, and high. These levels of service are described in detail below.

The cost estimate given above ($10.2 million) only covers the base costs of a stormwater program. This is considered a low level of service where the permit regulations will be met, but no extras will be provided. In a low level of service condition, the following can be provided:

- Meet Minimum Provisions of the Stormwater Management Program (SWMP)
- Continue Current WNYSC Activities
- Illicit Discharge Detection and Elimination (IDDE) inspections @ 20% of Outfalls per Year
- Monthly Construction Site Inspections
- Annual Post-Construction Practice Inspections
- Reactive Maintenance of Post-Construction Practices
- Reactive Cleaning of Catch Basins and Storm Pipes
- Pollution Prevention and Good Housekeeping
- Some Stream/Creek Cleaning

With additional revenue, expanded levels of service could be provided. In a medium level of service, everything within the low level of service will be provided along with:

- Increased Educational Seminars and Training
- GIS Mapping of Storm Sewers
- Proactive Cleaning of Catch Basins and Storm Sewers
- Catch Basin Stenciling
- Enhanced Street Sweeping
- Rotational Program of Stream/Creek Cleaning
- Regional Hydraulic and Hydrologic Modeling
- Regional Stormwater Master Planning
- Regional Monitoring for Water Quality and Quantity

A high level of service will require even more revenue, but will include many progressive aspects of stormwater management. This level of service aims to quickly and aggressively achieve full compliance with the existing MS4 regulations while also preparing for future potential regulatory requirements. The proactive nature of this program will help ensure that the MS4 communities are prepared for future regulatory and environmental developments. In a high level of service, everything within the low and medium levels of service will be provided along with:

- Create and Utilize an Asset Management Program
- Create Capital Improvement Plans
- Accelerated Level of Capital Improvements
- Enhanced Public Education – TV Commercials
- Organize More Public Clean-Up Events
- Manufactured Steel Stencils for Catch Basin Labeling
- Open Space Strategies
  - Establish Easements Along Streams/Creeks

  - Acquire Conservation Corridors
- Develop Stormwater Management Standards
  - Low Impact Development

3.5 Stormwater Utility District Development Costs

The WNYSC will incur additional costs associated with creating a separate stormwater utility district. These costs are estimated to be in the range of $400,000 to $800,000, including legal and consulting fees dependent on the organizational structure developed for the utility. Therefore, additional grant funding support from the State would be needed to encourage creating a separate stormwater utility district and to offset some of these costs. The portion of these costs not covered by grants could potentially be financed with the debt paid off with annual revenue collected by the district after creation.

Section 4. Revenue Projections

This section provides a discussion of the proposed fee structure, credit program options, connection fees, impervious area and Equivalent Residential Unit (ERU) calculations, and revenue estimation scenarios.

4.1 Proposed Fee Structure

Based on experience with other SUDs, the primary way to fund such a district is a user fee. A user fee is typically selected because it establishes a dedicated fund of stormwater revenues and is a defensible method to allocate stormwater service costs equally to users (i.e., customers).

User fees must be fair and equitable to all; and as such, fee assessment methods must bear a direct relationship to the costs of service for a particular individual and not be used to simply generate revenue. For this reason, methods based on property values, total acreage, or other factors that do not directly contribute to the stormwater runoff of the region were not considered. The user fee should be based on parameters related to the quantity and quality of stormwater runoff generated by the actual users, to cover costs for managing stormwater within the region's watersheds.

A fair and equitable user fee accounts for the needs and costs of each user. A user that generates a large amount of heavily polluted stormwater runoff should pay more than a user that generates less runoff or one who builds and maintains their own detention pond and on-site treatment system. The use of an incentive-based fee system is recommended where initial fee assessments are made based on impervious area and then adjusted to compensate for the unique stormwater features of a site. In this way, on-site management credits provide an incentive for users to carry out their own stormwater management measures or to adopt recommended stormwater measures.

A typical fee structure would consider the following factors:

- Total impervious area
- On-site management credits

Total impervious area can be calculated on a site-by-site basis using regular housing assessment data prepared either by the district or member municipalities. In addition, inspections would ensure the accuracy of the billing data, and should be an integral part of program development. Regular inspections should be used to ensure that changes to impervious areas are applied to bills. Users should also be able to request a special investigation of their site if they add or remove impervious surfaces.

On-site management credits should be based on field certificates of inspection with owner provision of maintenance for on-site storage and treatment of stormwater runoff. The goal of these incentives is to recognize and reward users with stormwater facilities that improve the health of the regions' water bodies.

These two factors (impervious area and management credits) could be combined to calculate each user's fee in a way that fairly and equitably allocates the cost of service to individual users. Typically, the unit of measure used for calculating the user fee for individuals is the ERU. The ERU is defined as the average impervious surface area (e.g. 2,682 square feet) of a single family housing unit. Generally, as defined by other SUDs in the country, single family homes constitute one ERU with a fee ranging from $4 to $20/month/ERU. The advantage of using the ERU concept is that it has been successful in generating revenue by stormwater utilities throughout the country. In addition, the ERU method for charging user fees can account for housing density and differences between municipalities, ensuring that customers are charged based on their contribution to stormwater costs. For this reason, a user fee based on ERUs is proposed as the basis of the revenue assessment for this report.

4.2 Stormwater Fee Credit Programs

Stormwater credit programs can provide a financial incentive for property owners to perform stormwater activities that improve the quality and/or quantity of stormwater contributing to the municipal stormwater system. Such programs typically apply to non-single family property owners, and require an application process and annual verification procedure. These credits could also be applied to single-family homes, but the amount of effort needed for the annual verification process could make the costs of administering these credits greater than the benefits achieved. Credits to reduce the amount of stormwater charges being assessed to a respective property are most commonly offered for performing the following activities:

- Reducing the impact of stormwater (quality, quantity, or rate of flow) for a particular property to an acceptable standard; and/or
- Reducing the cost of service to the municipality by performing activities that otherwise would fall within the purview of municipal stormwater management responsibilities.

Credits are typically applied to the stormwater charge as a percentage reduction on a per-measure basis or as a flat fee reduction. Most municipalities limit the maximum stormwater credit reduction to 50 percent of the total stormwater charge. A recent study of 71 stormwater utilities in 22 states found that of the 40 percent of utilities that provide a stormwater credit program, 61 percent provide credits that are both quality and quantity based. It is also important to only offer credits for those actions or controls that exceed adopted stormwater standards. If credits are offered for compliance with the adopted standards, then the costs for site development are passed to all utility customers rather than the property owner.

The general goals to consider if a credit program is implemented are presented in Table 4.1 with basic mechanisms to accomplish the fee reduction and processes for implementation.

Table 4.1: Stormwater Credit Program Framework

Goal of Credit	Mechanism for Fee Reduction	Process for Implementation
Reduce Imperviousness	■ Percent fee reduction ■ Per square foot credit	■ Percent reduction in imperviousness ■ Square feet of pervious surfaces
On-site Management	■ Percent fee reduction ■ Quantity/Quality credits (performance-based)	■ List of practices with various credits ■ Total area (square feet) managed
Volume Reduction	■ Percent fee reduction ■ Performance-based quantity reduction	■ Percent reduction in imperviousness ■ Performance-based ■ Total area (square feet) managed
Use of Specific Practices	■ Percent fee reduction ■ One time credit	List of practices with various credits

Source: District of Columbia, District Department of the Environment. "Stormwater Utility Fee Credits and Incentives: Options for Impervious Area Billing." February 2008. [Online] Available: http://ddoe.dc.gov/ddoe/lib/ddoe/stormwaterdiv/Fee_Discount_Presentation_2.5.08.pdf

4.3 Credit Options

The following ten potential credit program options are identified for the WNYSC to consider. These options are based on best stormwater management practices and credit programs currently used in municipal stormwater programs across the country. Additional details about these credit options are presented in Appendix D.

- Detention/Retention Systems
- Water Quality Ponds
- Vegetated (Stream) Buffers
- Grass Filter Strips
- Infiltration Trenches
- Education Programs
- Disconnection of Impervious Areas
- Constructed Wetlands
- Swales
- Direct Discharges

As was described above, it is important that credits be allowed only when the proposed measures are applied in a manner to exceed the requirements established by adopted design standards to meet the quantity and quality performance criteria for post development conditions.

4.4 Stormwater Connection Fees

Stormwater connection fees are also known as system development charges, capital facility fees, and system capacity charges. These fees are most often intended to recover a fair share of the prior public investment in infrastructure capacity installed to accommodate future development. In most cases, stormwater connection fees are related solely to capital costs, though some justification may exist in certain circumstances for incorporating long-term operating expenses.

Stormwater connection fees provide a mechanism whereby developers participate in paying for capacity that was previously built into public systems in anticipation of their needs. Because this situation will vary by community and be difficult to implement as a start-up option for the WNYSC program, it is not considered by this study as an initial revenue source and could deserve further study during program implementation to determine the longer term SUD strategy for connection fee credits.

4.5 Impervious Area and ERU Calculations

As mentioned earlier in this section, fee assessment methods must bear a direct relationship to the costs of service. Impervious area directly contributes to stormwater runoff. Therefore, the user fee will be based on impervious area. To estimate the revenue that could be generated by a user fee, one first needs to estimate the amount of impervious area in the MS4 regulated communities. Using GIS data and property type classification codes, the impervious area was estimated.

4.5.1 General Information

The MS4 regulated communities in Erie and Niagara counties consist of 39 communities with a total land area of approximately 1 million acres. The 39 communities have been organized into three districts, each consisting of 13 communities, based on population density. It was important to separate the communities into multiple districts as there are significant differences between districts. For example, District 3 includes the most densely populated areas that have smaller homes with smaller amounts of impervious area. These districts and the associated communities are shown in Figure 4.1 and include the following:

District 1 (lowest population density): Alden, Aurora, Boston, Cambria, Clarence, Eden, Elma, Evans, Grand Island, Lewiston, Pendleton, Porter, and Wheatfield.

District 2: Amherst, Hamburg, Lancaster, Niagara, Orchard Park, Village of Alden, Village of Angola, Village of Blasdell, Village of East Aurora, Village of Lewiston, Village of Orchard Park, West Seneca, and Youngstown.

District 3: (highest population density): City of Buffalo, City of Tonawanda, Cheektowaga, Lackawanna, City of North Tonawanda, Town of Tonawanda, Village of Depew, Village of Hamburg, Village of Kenmore, Village of Lancaster, City of Niagara Falls, Village of Sloan and Village of Williamsville.

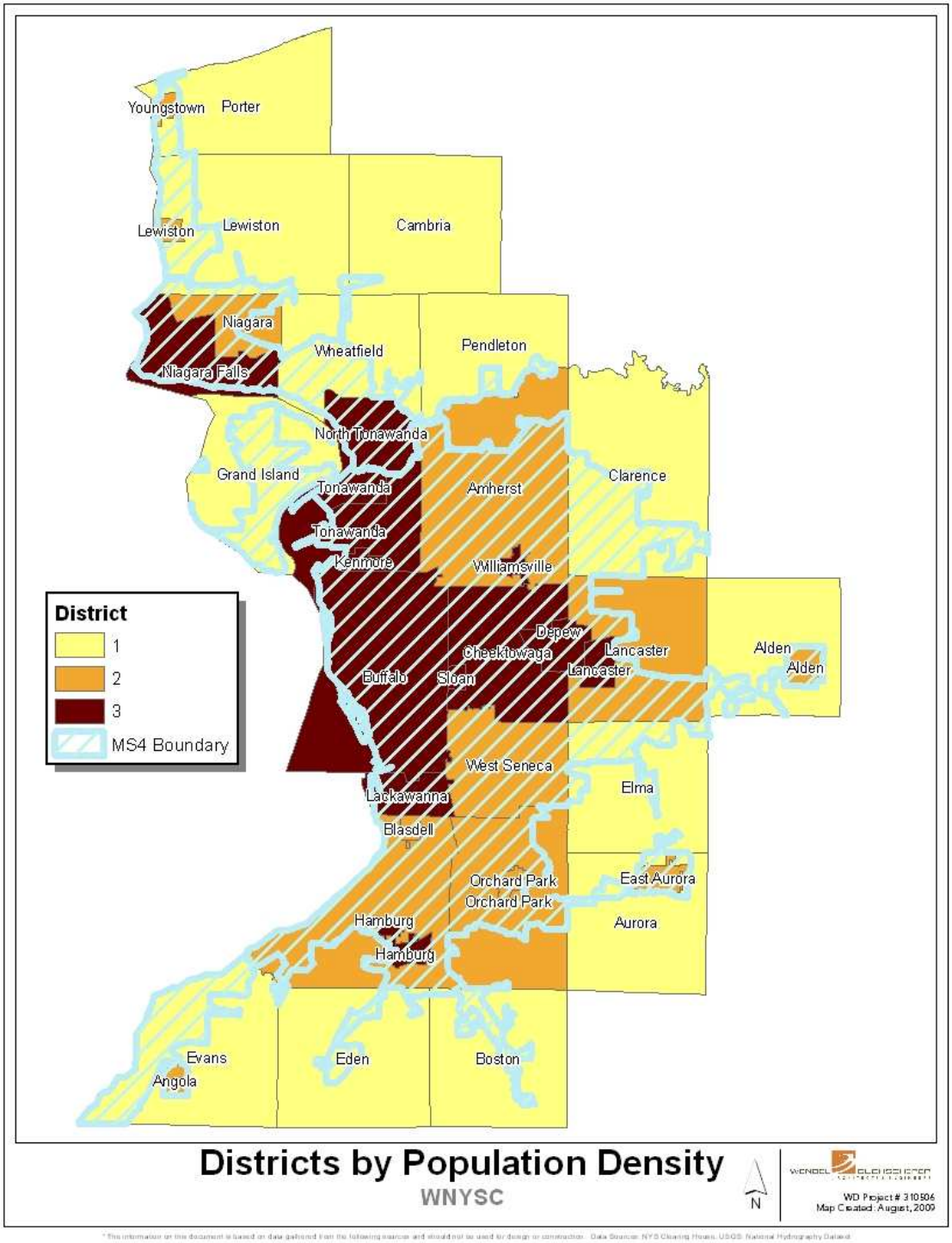

Figure 4.1: The Communities of the WNYSC Labeled by District

It was important to know which property types and how much of each property type existed within each district. The property type classifications code information were obtained from the New York State Office of Real Property Services (RPS). The New York State Office of RPS has a uniform land classification system used in all New York counties. The system of classification consists of numeric codes in nine separate categories. Each of the nine categories is composed of divisions and subdivisions that are indicated by the second and third digits. With the exception of the residential series codes, this assessment sums all parcels within each code by category. The residential properties were summed separately by either single family or multi-family dwellings.

The New York State RPS codes used in the assessment include:

- Inadequate Property Description (0 series): The number "0" has been reserved to fill in the coding structure where description of the property is inadequate to assign a code at the division level, subdivision level or where it was not necessary to establish a subdivision.
- Agricultural (100 series): Property used for the production of crops and livestock.
- Residential (200 series): Property used for human habitation. Living accommodations such as hotels, motels, and apartments are in the Commercial category (400 series).
- Vacant Land (300 series): Property that is not in use, is in temporary use, or lacks permanent improvement.
- Commercial (400 series): Property used for sale of goods and/or services.
- Recreation and Entertainment (500 series): Property used by groups for recreation, amusement, or entertainment.
- Community Services (600 series): Property used for the well being of a community.
- Industrial (700 series): Property used for the production and fabrication of durable and nondurable man-made goods.
- Public Services (800 series): Property used to provide services to the general public.
- Wild, Forested, Conservation Lands and Public Parks (900 series): Reforested lands, preserves, and private hunting and fishing clubs.

Table 4.2 summarizes the land use classification, number of parcels, and area information for all WNYSC communities organized by the nine New York State residential property codes. As indicated in the table, the region consists of 416,851 parcels within an area of 43.7 billion square feet (approximately 1 million acres). Over 40% of the land area is classified as residential area (either single or multi-family) while 21% is classified as vacant land and 12% is classified as agricultural land. All other classifications are less than 10% of the total area.

Table 4.3 summarizes the land use classification, number of parcels, and area information organized by district. Approximately 60% of the total area is located within District 1, 25% of the total area is within District 2, and 15% of the total area is in District 3. It is

interesting to note that District 3, while having the smallest land area, has the largest number of parcels. This is due to the high density of development in this District.

Table 4.4 summarizes the land use classification, number of parcels, and area information organized by district for the MS4 regulated areas only. Of the total 43.7 billion square foot area for all the WNYSC communities, approximately 18.6 billion square feet are located within the designated MS4 area. The number of parcels within the WNYSC communities is weighted towards the MS4 area. In total, there are 416,851 parcels in the WNYSC communities. The MS4 area includes 372,388 parcels.

Summaries of the land use classification, number of parcels and area information for each individual community are provided in Appendix E. These tables summarize not only the breakdown by property type for each RPS code, but also provide the total area and each community's percentage of total square footage.

Table 4.2: Land Area Summary for All WNYSC Communities

RPS Description	# of Parcels	Total Assessment	Area (sq. ft.)	Area (acres)	% of Total Area
Unclassified	6,834	$2,909,372,310	2,892,013,118	66,401	7
Agricultural	2,260	$376,273,512	5,139,944,251	118,013	12
Single Family Residential	262,079	$49,872,893,317	11,185,231,369	256,813	26
Multi-Family Residential	58,871	$7,368,508,414	6,617,889,178	151,947	15
Vacant Land	49,919	$1,656,930,653	9,237,661,019	212,097	21
Commercial	23,119	$15,195,216,595	2,235,676,136	51,331	5
Recreation and Entertainment	2,445	$2,098,593,674	1,296,365,753	29,765	3
Community Services	4,247	$16,197,902,936	1,816,262,337	41,701	4
Industrial	2,077	$2,510,556,042	1,217,184,326	27,947	3
Public Services	3,584	$5,277,553,134	1,049,421,629	24,095	2
Forested and Public Parks	1,416	$885,845,900	1,061,396,568	24,370	2
Totals	416,851	$104,349,646,487	43,749,045,685	1,004,478	100

Table 4.3: Land Area Summary for All WNYSC Communities, by District

RPS Description	District 1		District 2		District 3	
	# of Parcels	Area (acres)	# of Parcels	Area (acres)	# of Parcels	Area (acres)
Unclassified	1,920	41,013	2,222	11,721	2,692	13,667
Agricultural	1,490	110,411	444	7,602	326	0.27
Single Family Residential	47.881	135,099	80,799	79,666	133,399	42,048
Multi-Family Residential	4,536	119,759	5,657	20,506	48,678	11,681
Vacant Land	11,919	129,982	13,555	60,283	24,445	21,831
Commercial	2,694	12,560	5,073	18,383	15,352	20,388
Recreation and Entertainment	724	10,045	743	12,233	978	7,486
Community Services	934	15,305	1088	15,285	2,225	11,111
Industrial	419	7,367	462	9,344	1,196	11,236
Public Services	973	7,700	1108	7,016	1,503	9,378
Forested and Public Parks	407	12,131	443	5,308	566	6,931
Totals	73,897	601,372	111,594	247,348	231,360	155,758

Table 4.4: Land Area Summary for All WNYSC Communities, MS4 Regulated Area Only

RPS Description	# of Parcels	Total Assessment	Area (sq. ft.)	Area (acres)	% of Total MS4 Area
Unclassified	5,760	$189,637,360	1,215,828,616	27,915	7
Agricultural	1,101	$26,132,550	305,364,310	7,011	2
Single Family Residential	234,941	$43,969,271,205	6,324,688,341	145,215	34
Multi-Family Residential	54,408	$6,357,728,672	1,471,140,906	33,777	8
Vacant Land	41,817	$1,133,702,391	3,657,413,930	83,974	20
Commercial	21,837	$14,403,394,715	1,759,376,594	40,395	9
Recreation and Entertainment	2,276	$1,889,999,570	720,027,539	16,532	4
Community Services	3,845	$14,363,662,136	1,240,133,784	28,473	7
Industrial	1,792	$1,895,436,680	636,691,457	14,618	3
Public Services	3,269	$3,827,706,174	686,883,413	15,771	4
Forested and Public Parks	1,342	$668,284,600	543,037,209	12,468	3
Totals	372,388	$88,724,956,053	18,560,586,101	426,151	100

4.5.2. Impervious Areas

This section provides a preliminary estimate of impervious or billable land area. A detailed analysis of impervious area for each participating community would be needed during the next phase of this project if the SUD is to be established. This preliminary revenue analysis used available county-wide records of lot sizes and building areas for all developed properties. Parcel information obtained for each of the municipalities included parcel types and land acres by land use category (residential, commercial, etc) and MS4 district.

A sample set of properties was chosen to examine typical impervious areas by district. Approximately one hundred residential and a combined one hundred commercial, recreation and entertainment, community services, industrial and public services properties were selected in each district. Impervious surfaces, including roofs, patios, driveways, parking areas, and sidewalks were measured to calculate a total property impervious area.

Due to large parcel land area variances within the sample subset, a statistical median (50^{th} percentile) was selected as the assumed impervious area for each sample set. The median impervious area for each district was calculated as:

- District 1: 14,808 square feet for commercial properties and 3,787 square feet for residential properties.
- District 2: 19,345 square feet for commercial properties and 2,832 square feet for residential properties.
- District 3: 5,883 square feet for commercial properties and 2,232 square feet for residential properties.

A weighted average of the median residential impervious area for all districts combined was calculated as 2,682 square feet.

For the following land classifications, an impervious area of 0 square feet was used:

- unclassified areas;
- agricultural;
- vacant land;
- wild, forested, conservation lands and public parks.

Agricultural and vacant land billing unit calculations are described in Section 4.7.

Table 4.5 summarizes the total impervious area organized by district. As indicated in the table, of the total 43.7 billion square foot area for the region, approximately 1.2 billion square feet is assumed to be impervious. Table 4.6 summarizes the total impervious area by district for the MS4 regulated area only. Approximately 1.1 billion square feet of impervious area is located within the MS4 regulated area.

Table 4.5: Impervious Area for All WNYSC Communities, by District

RPS Description	District 1		District 2		District 3	
	# of Parcels	Impervious Area (sq. ft.)	# of Parcels	Impervious Area (sq. ft.)	# of Parcels	Impervious Area (sq. ft.)
Unclassified	1,920	0	2,222	0	2,692	0
Agricultural	1,490	0	444	0	326	0
Single Family Residential	47.881	181,325,347	80,799	228,822,768	133,399	301,081,543
Multi-Family Residential	4,536	17,177,832	5,657	16,020,624	48,678	109,866,246
Vacant Land	11,919	0	13,555	0	24,445	0
Commercial	2,694	39,892,752	5,073	98,137,185	15,352	90,315,816
Recreation and Entertainment	724	10,720,992	743	14,373,335	978	5,753,574
Community Services	934	13,830,672	1088	21,047,360	2,225	13,089,675
Industrial	419	6,204,552	462	8,937,390	1,196	7,036,068
Public Services	973	14,408,184	1108	21,434,260	1,503	8,842,149
Forested and Public Parks	407	0	443	0	566	0
Totals	73,897	283,560,331	111,594	408,772,922	231,360	535,985,071

Table 4.6: Impervious Area for the MS4 Regulated Portion of all the WNYSC Communities, by District

RPS Description	District 1		District 2		District 3	
	# of Parcels	Impervious Area (sq. ft.)	# of Parcels	Impervious Area (sq. ft.)	# of Parcels	Impervious Area (sq. ft.)
Unclassified	1,077	0	2,085	0	2,596	0
Agricultural	408	0	367	0	326	0
Single Family Residential	28,942	109,603,354	76,893	217,760,976	129,106	291,392,242
Multi-Family Residential	1,608	6,089,496	5,305	15,023,760	47,495	107,196,215
Vacant Land	5,824	0	11,760	0	24,233	0
Commercial	1,978	29,290,224	4,877	94,345,565	14,982	88,139,106
Recreation and Entertainment	604	8,944,032	716	13,851,020	956	5,624,148
Community Services	647	9,580,776	1017	19,673,865	2,181	12,830,823
Industrial	282	4,175,856	383	7,409,135	1,127	6,630,141
Public Services	737	10,913,496	1065	20,602,425	1,467	8,630,361
Forested and Public Parks	360	0	422	0	560	0
Totals	42,467	178,597,234	104,890	388,666,746	225,031	520,443,036

4.6 Equivalent Residential Units (ERU)

Using the impervious area data calculated previously, the number of ERUs in the WNYSC area can be determined. The number of ERUs was calculated using the following equation:

Units (ERU) = Dwelling Units + Non Residential Impervious Area (square feet) / Median Residential Impervious Area (square feet)

This yields a number of ERU's upon which the fees can be determined.

Based on the data, the total number of ERUs is estimated at 460,407. Table 4.7 summarizes the ERUs for all three districts and for the MS4 regulated area only by district.

Table 4.7: Calculated Equivalent Residential Units

District	ERUs	
	Entire Area	MS4 Area Only
1	84,131	54,004
2	147,578	140,320
3	228,698	222,035
TOTAL	460,407	416,359

4.7 Agricultural and Vacant Lands

As indicated previously, it was assumed an impervious area of 0 square feet for agricultural and vacant lands due to the lack of available impervious area information. However, because these land types can impact stormwater quality for the region, a possible method for calculating equivalent service costs was developed based on estimating the amount of runoff these land types produce. The method used to calculate revenue from vacant and agricultural lands was based on typical runoff ($Q_{r)}$ using the Rational Method. The methodology is included as Appendix F.

Using the data collected and this methodology, the total number of ERUs for agricultural and vacant lands is estimated at 5,900. Table 4.8 summarizes the agricultural and vacant land ERUs for all three districts and for the MS4 regulated area only by district.

Table 4.8: Calculated ERUs for Agricultural and Vacant Lands

District	ERUs	
	Entire Area	MS4 Area Only
1	3,622	669
2	859	617
3	1420	773
TOTAL	5,901	2,059

Because of the relatively small number of ERUs, and therefore revenue, compared to the effort and challenges with assessing costs to vacant and agricultural land, it is not

recommended that such a fee be included with the initial SUD, if it is chosen for implementation.

4.8 Community Participation

It should be noted that the ERU analyses include participation of all communities in the WNYSC in both Erie and Niagara Counties. If a community opts to not participate in the stormwater utility district, the total number of ERUs and potential revenue will drop accordingly. For example, if a large community such as Amherst opts to not participate in the stormwater utility district, 10% of the total ERUs calculated would be eliminated. The majority of the communities in Western New York each constitute 1 to 3% of the total ERUs for the district. The full list of ERUs per community is provided in Table 4.9.

Table 4.9: Number of ERUs for each Community

Community	ERUs
Town of Alden	4,028
Village of Alden	2,863
Town of Amherst	45,140
Village of Angola	2,732
Town of Aurora	4,617
Village of Blasdell	3,384
Town of Boston	4,812
Buffalo Sewer Authority	91,347
Town of Cambria	3,564
Town of Cheektowaga	30,047
Town of Clarence	14,462
Village of Depew	7,056
Village of East Aurora	5,646
Town of Eden	4,835
Town of Elma	6,966
Town of Evans	7,747
Town of Grand Island	9,870
Town of Hamburg	20,854
Village of Hamburg	4,292
Village of Kenmore	6,558
City of Lackawanna	7,044
Town of Lancaster	12,345
Village of Lancaster	4,772
Town of Lewiston	6,538
Village of Lewiston	3,423
Town of Niagara	7,394
Niagara Falls Water Board	22,242
City of North Tonawanda	13,065
Town of Orchard Park	13,325
Village of Orchard Park	3,602
Town of Pendleton	3,883
Town of Porter	3,472
Village of Sloan	2,063
City of Tonawanda	6,971
Town of Tonawanda	30,636
Town of West Seneca	24,042
Town of Wheatfield	9,335
Village of Williamsville	2,604
Village of Youngstown	2,828
Total	460,404

Niagara County constitutes approximately 15% and Erie County constitutes approximately 85% of the total ERUs calculated for the region. If Niagara County opted to not participate in the stormwater utility district, the total number of ERUs would be reduced by 68,504. It will be important to re-evaluate the total number of ERUs and the associated SUD revenue once communities have decided who will participate.

4.9 Preliminary Fee Scenarios

Various fee scenarios have been provided to illustrate how the SUD may function financially.

4.9.1 Base Scenario

Using the ERU calculations and impervious area assumptions previously described, a range of hypothetical, projected revenue was calculated. The revenue generated under three base fee amounts ($3.00, $4.00, and $5.00 per ERU per month) with all communities participating are presented in Table 4.10. The total projected revenue ranges from $13.26 million to $22.1 million. These revenue estimates account for data uncertainties, a fee credit program as described earlier in this section, and collection delinquencies. The surplus generated by the fee would be used to improve regional services, to address priority improvement needs, and to increase the level of service provided.

Table 4.10: Revenue Summary of the Base Scenario SUD for various fee structures

	Fee per ERU (per month)		
	$3.00	$4.00	$5.00
Revenue Generated	$13,260,000	$17,680,000	$22,100,000
SUD Costs	$10,162,000	$10,162,000	$10,162,000
Surplus	$ 3,098,000	$ 7,518,000	$11,938,000

This base scenario presented above is only one potential alternative. Others that were evaluated are presented below. However, many others could be considered if an SUD is developed. Additional scenarios should be evaluated during the Phase 2 implementation effort.

4.9.2 Alternate Scenario #1: Separate Erie and Niagara County SUDs

The first alternate scenario studied the impact of breaking the SUD into two separate SUDs, (i.e., Erie and Niagara). The financial summary for separate Erie and Niagara Counties SUDs are provided in Tables 4.11 and Table 4.12 respectively.

Table 4.11: Revenue Summary for an Erie County SUD for various fee structures

	Fee per ERU (per month)		
	$3.00	$4.00	$5.00
Revenue Generated	$11,078,000	$14,772,000	$18,464,000
SUD Costs	$ 8,420,000	$ 8,420,000	$ 8,420,000
Surplus	$ 2,658,000	$ 6,352,000	$10,044,000

Table 4.12: Revenue Summary for a Niagara County SUD for various fee structures

	Fee per ERU (per month)		
	$3.00	$4.00	$5.00
Revenue Generated	$2,182,000	$2,908,000	$3,636,000
SUD Costs	$1,997,000	$1,997,000	$1,997,000
Surplus	$ 185,000	$ 911,000	$1,639,000

Separate SUDs for Erie and Niagara County are both viable alternatives. However it is important to note that under the low fee amount of $3 per ERU, a Niagara County SUD would have very little money available for regional projects. Also, the amount of money available for regional projects (the surplus) combined is less for these alternatives than for a combined SUD. This is due to a duplication of administrative costs in this alternative.

4.9.3 Alternate Scenario #2: Only Regulated MS4 Areas

Under the previous alternatives, revenue was generated from all of the properties within the community, not just the properties within the regulated MS4 area of these communities. In this scenario, the revenue from properties outside of the regulated MS4 area have been removed and the financial summary of this scenario is presented in Table 4.13.

Table 4.13: Revenue Summary of the SUD for various fee structures with the non-MS4 properties removed

	Fee per ERU (per month)		
	$3.00	$4.00	$5.00
Revenue Generated	$10,725,000	$14,300,000	$17,875,000
SUD Costs	$10,162,000	$10,162,000	$10,162,000
Surplus	$ 563,000	$ 4,138,000	$ 7,713,000

Alternate Scenario #2 is not a recommended alternative. Areas outside the MS4 boundary of each community benefit from regional activities such as stream and creek cleaning, flood mitigation, and water quality improvements. Using the MS4 area only may also cause boundary issues for the SUD. The MS4 boundary is not a static boundary. With changes in the US Census or changes to the regulations, the MS4 boundary of a community may change. Modifying the SUD boundary each time the census or regulations change may not be a simple process. For these reasons, we believe that Alternative Scenario #2 should not be recommended for an Erie and Niagara County SUD.

Section 5. Organizational Structure

In the previous sections, data to support the creation of an SUD was collected and an analysis of the financial feasibility of an SUD was developed. In this section, details of the potential organizational structure of the SUD will be reported.

First, the responsibilities of the SUD and the responsibilities of the municipalities will be defined. This definition of responsibilities will shape the organizational structure of an SUD for Erie and Niagara Counties. Using the responsibilities and other information, potential structures of an SUD will be presented. Details of these organizational structures will be given and the advantages and disadvantages of each will be presented. Additional details related to the organizational structure will also be given including:

- Staffing
- Decision Making Process
- Leadership of the SUD
- Transitioning to an SUD
- Funding Regional Projects

5.1 Responsibilities of an SUD for Erie and Niagara Counties

The major driver of this feasibility study is funding for stormwater. Therefore, any SUD organization structure selected must have a method for collecting fees or taxes. As shown in the revenue section, a great majority of this money will then be returned to the individual communities to spend on their stormwater programs.

The remaining money collected by the SUD will be used for four things:

1) Regional Issues: As mentioned, both Erie and Niagara County have regional flooding and water quality issues that cannot be solved by a single municipality. The regional SUD selected could be used to mitigate these issues
2) Improving the Level of Service: Additional money could be spent by the SUD or by municipalities to improve the level of service to their residents. Under the base case, only the minimum needed to meet the stormwater permit is provided. With additional funding, municipalities would be able to move to higher levels of service as identified in Section 3.4.
3) Funding for the Counties: Erie and Niagara County have stormwater costs that would be provided by an SUD.
4) Providing WNYSC services: The SUD for Erie and Niagara County would take over the activities that the WNYSC currently completes. The communities are very happy with what the WNYSC has does for them in the past and any new SUD should take over these activities.

5.2 Responsibilities of the Municipalities

Many of the decisions on stormwater management will still be made by the municipalities even after establishment of an SUD. In the interviews, communities were very hesitant to give up local control of their infrastructure and employees. The organizational structure of the SUD will reflect this and after development of an SUD, the municipalities will still be responsible for:

- Ownership of the stormwater infrastructure
- Capital improvements to the stormwater system
- Operating, maintaining, and cleaning storm sewers, catch basins, and stormwater outfalls
- Street sweeping
- Policy decisions related to stormwater
- Enforcing non-compliance with stormwater laws
- Performing stormwater pollution prevention plan reviews
- Construction inspections
- Inspecting and maintaining post-construction practices
- Performing pollution prevention and good housekeeping at their own facilities

5.3 Evaluating Organizational Structures

Typical organizational models for a stormwater authority include:

- Creating an independent stormwater utility district (SUD),
- Establishing an SUD within an existing county department
- Establishing an authority within an existing wastewater or water authority
- Establishing a regional authority created through intermunicipal agreements.

Because no wastewater or water authority can provide coverage of the jurisdiction for this project area and it would be very complicated to implement this type of organizational structure, it is not evaluated in this analysis. In addition, the WNYSC is currently established using intermunicipal agreements with associated limitations on collecting fees, operating facilities and accomplishing capital projects. Therefore, the idea of establishing a regional authority through intermunicipal agreements has not been evaluated in this section.

This analysis reviews the remaining organization options to identify the advantages and disadvantages of primary organization alternatives that could be implemented by the WNYSC to enhance its stormwater management activities. Each of these organizational structures provides an opportunity to establish a dedicated funding source based on an equitable fee structure and a centralized management system for stormwater management activities. Careful consideration of political acceptance, level of control, accountability and public awareness must be taken into account in analyzing an adequate organizational structure.

5.3.1 Development of an Independent Stormwater Utility District (SUD)

This alternative consists of an independent organization that is managed and operated by the SUD. This could be a regional authority created by more than one community. The SUD would be responsible for financing stormwater activities including operations, maintenance, and other regional projects. Ownership would be retained by the municipalities using contracts to assign defined responsibilities to the SUD using existing staff and equipment to the extent that it can be used to meet the desired level of service established for the new SUD. Traditional methodologies for developing the boundaries of a regional SUD can include municipal boundaries, MS4 boundaries, an existing authority's boundaries or a watershed boundary approach. In order to develop a regional SUD, special State legislation would have to address the ownership, operations and financing of stormwater management activities. Although regional watershed management provides many distinct advantages there are currently no incentives provided by the State to develop regional authorities to address stormwater management.

Under this alternative, each municipality would receive funding from the SUD to operate and maintain their stormwater system. A disadvantage of this alternative is that each municipality would lose some control of stormwater management fees that are assessed to the public. A more complete list of advantages and disadvantages of a regional SUD are given below.

Advantages of a Regional SUD:

- Individual municipalities could work together to ensure regulatory compliance;
- Consistent solutions to stormwater problems could be completed across the region;
- Provides a dedicated funding source for stormwater programs;
- Potential for more grant dollars working together as a region; and
- Encourages watershed planning.

Disadvantages of a Regional SUD:

- Individual municipality potentially loses some control of stormwater management activities and fees that are assessed to the public;
- Initially higher cost of financing since the new authority has no financial history;
- Potential public resistance to increased fees for stormwater management;
- Creation of a new utility district with an additional level of government; and
- New state legislation will be required for multiple municipalities to take part in a regional SUD.

5.3.2 Development of SUD administered by the Counties

This alternative consists of the establishment of an authority within Erie or Niagara County government (e.g., Public Works Department, Department of Environment and Planning, Drainage District, Soil & Water Conservation District, etc.). This authority

could take many forms but in general would add new responsibilities for financing stormwater management activities. The stormwater authority would remain a department of Erie or Niagara County but would no t rely on general tax revenues to support its stormwater operations.

In general, the advantages and disadvantages of this alternative are similar to those for an independent SUD. The advantages and disadvantages specific to this alternative are listed below.

Advantages of an SUD administered by the Counties:

- The SUD becomes part of an existing government agency and does not add a layer of government; and
- Existing staff may be familiar with stormwater activities.

Disadvantage of an SUD administered by the Counties:

- State Legislation would be needed to permit the collection of funds for this agency and allow for allocation of funds back to the communities. This could be problematic as it can be very difficult to change existing organizational structures.

This last disadvantage is an important one that will be discussed in detail in the section of the report on legal issues. Due to this disadvantage, a new SUD is recommended as an organizational structure for a regional stormwater authority in Erie and Niagara Counties.

5.4 Framework of the SUD

A potential framework for this organizational structure is given in Figure 5.1. Four major groups are shown as part of this figure including:

- Staff
- The Representative Body
- The Executive Leadership Committee
- Customers/Stakeholders

The next few paragraphs will describe these different groups as part of the organizational structure.

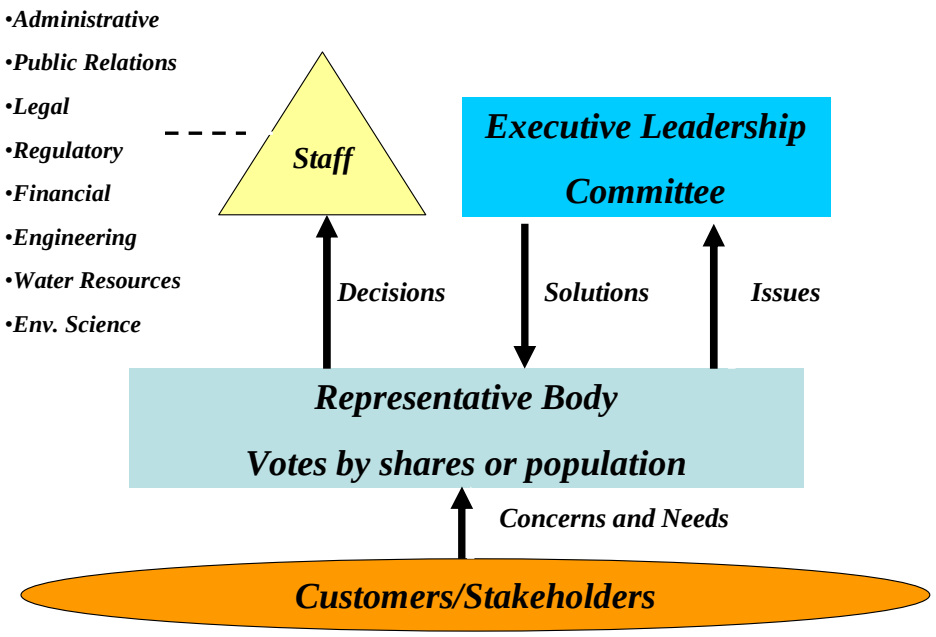

Figure 5.1: Organizational Framework for an SUD in Erie and Niagara Counties

5.4.1 SUD Staffing

The staff required to facilitate the functions of the SUD is an important factor in its success in moving forward and operating efficiently. The final decisions on staffing of an SUD will not be done within this feasibility phase, but general information is provided below to define what the staffing of an SUD might look like. It is anticipated that the functions of the existing WNYSC will be continue under the SUD and the ECDEP staff that currently works to support the SUD may become the initial staff of the SUD for Erie and Niagara Counties.

The development of a staffing plan which identifies profiles of the disciplines required for providing regional stormwater management services should be considered. A starting point for developing this staffing profile is to identify the management, engineering, and support personnel for the new SUD. Table 5.1 identifies potential roles.

Table 5.1: Staffing Profile and Disciplines for Regional Stormwater Services

Discipline	Description
Administrative/Management	Leadership, coordination, and processing.
Political Liaison/Public Relations	Liaison to each municipality to address local needs and gauge public sentiment. Develops public programs. Maintains relations with all stakeholders.
Legal	Essential in early stages of district if lawsuits are filed by stakeholders that do not see advantages of it or are seeking damages due to flooding. Would be needed to establish and maintain district charter and legal authority within each municipality. All legal contracts, agreements would need to be assessed.
Regulatory	Charged with ensuring Phase II NPDES regulations are met. Maintain current minimum control measures and performance. Keeps up with regulatory changes relevant to district. Would coordinate with local legislatures to ensure consistent regulations.
Financial	Assess best financing approach for capital and operating expenses. Maintain accounts and track revenues. Carry out bonding process.
Engineering	Needed to handle the significant amount of capital improvement planning and design that would be required; especially in the beginning stages. Specifications would need to be developed and assessed. Design firms need to be selected, tracked and coordinated. Submittals need to be evaluated.
Information Technology (IT)	Data management and maintenance.
Water Resources/Environmental Scientists	Water quality and hydrological assessments to aid in capital improvement planning and performance benchmarking.
Inspection/Enforcement	Improper land use, illegal connections.

5.4.2 The Representative Body

For a SUD to govern both effectively and legitimately there must be both fair representation of the member communities and a way to maintain focus on the regional district's overall goals. In the framework presented earlier, the representative body will be

responsible for most of these decisions. The following paragraphs propose a voting and governance framework that can be adapted to guide decisions.

The Representative Body would consist of representatives of each community along with representatives from Erie and Niagara County as the main decision making body. In addition, NYSDEC representatives could be included as ex-officio members. There are a number of ways that the district Board can come to an agreement:

- One vote per municipality;
- Voting shares allocated to each municipality by population percentage; or
- Voting shares allocated to each municipality by ERU percentage (i.e. revenue contributions).

If using either population or ERUs to allocate shares, then each member municipality representative has a number of voting shares equal to the relative percentages of people or ERU billing units within that municipality.

For those issues selected by the SUD when each member community receives one vote, then a simple majority of the votes would be needed to pass a motion. Approval of a motion should pass based on a consideration of the following criteria:

- All member municipalities must be represented;
- For issues related to costs of service and user fees, a super-majority of the shares should be in favor of the motion to ensure that the majority of bill-payers are represented;
- A simple majority of the persons in the body approving the motion should be in favor of the motion to ensure that all municipalities are represented.

The above framework has the advantage of both preventing one or two municipalities from dominating decision making, and dividing power proportionate to the level of financial contribution for costs of service and user fees. In addition, there should be a provision that any municipality must approve any motion to conduct a project within its territorial boundaries.

5.4.3 Executive Leadership Committee

The executive leadership committee (ELC) of the SUD would be responsible for the direction of the establishment of the SUD and to make recommendations to municipalities, businesses, developers, homeowners and chief officials for adoption. One possible framework for the ELC is as follows:

- Representatives from the municipalities that are part of the SUD. This would be similar to the how officers in the WNYSC are chosen.
- One ex-officio representative from the NYSDEC
- Ad-hoc members could include advisory members appointed by the municipalities.

- ELC will meet as needed to make timely decisions for the SUD

5.4.4 Customers/Stakeholders

Public opinion and public comment would be important to an SUD. The public would be invited to attend meetings of the SUD and provide comments on proposed projects identified by the SUD.

5.5 Transition Strategy

The SUD would need to work in conjunction with its legal counsel and representatives, as appropriate, to develop the documents required for an SUD. The SUD would need to identify the steps required to implement the transfer in sufficient detail so as to provide a road map of actions for proceeding with the implementation. Steps for implementation may include, but would not be limited to:

- Forming a "transaction subcommittee" to facilitate implementation;
- Achieving political consensus among the SUD and other agencies;
- Developing and undertaking public participation plan and formal public hearings to communicate requirements, solicit feedback, build consensus and approve the transfer;
- Establishing service levels including service area, extent of service and level of service including design, performance, inspection, operation, maintenance, reporting, monitoring, training, and licensing procedures and guidelines.

5.6 Regional Project Funding Strategy

As defined, the SUD would be responsible for capital improvement projects that mitigate regional flooding or regional water quality concerns. Project ideas could come from in-house SUD staff or from municipalities submitting project requests. Either way, a portfolio of potential projects should be developed for evaluation.

5.6.1 Evaluate Projects and Prioritize Project Portfolio

Evaluating and ranking individual projects is the most important step of any planning process, even more so when the members are not from the same community. Therefore, the goal of the evaluation and ranking process should be to maintain transparency and objectivity, which increases the legitimacy of the process. There are a number of ways that the evaluation and ranking process could be carried out objectively. One method is called a "staged prioritization" which is typically selected because of its transparency and ease of implementation. The following summarizes this approach:

- In staged prioritization, each project is given a ranking in several parameters. The categories would be determined by the district ahead of time, and can include items such as cost, complexity, and size, among others. However, in this approach, the parameters are not considered to be of equal importance. Instead,

the rankings for the highest priority category would be considered first when selecting projects to fund. Lower priority categories are only used in tie-breaking situations.

- Members of the SUD would give each project a ranking for each parameter. The individual member rankings are then combined into overall rankings by project for each parameter.

The following is a possible example of what the SUD could develop for the project ranking parameters (listed in order of priority):

- Flooding;
- Water quality;
- Local issues (local effects); and
- Time in portfolio.

Improvements can be prioritized using the above structure as follows:

- Members assign each project a ranking for each parameter; and
- Combine member rankings into overall parameter rankings. Sort the list by parameter, one ranking first, then by category two, then by category three and so on. This will be the ranked list of capital improvements.

The staged prioritization method relies on combining the individual member rankings into an overall ranking for each project in each set of parameters. For example, if there are four parameters (as listed above), each project would have four rankings from each member, one per parameter. The advantage of this ranking method is that it allows the members to consider projects individually; however, it also can lead to rankings being based on how the project helps the member's community, not how the project helps the goals of the district.

There are numerous ways that the individual member's rankings could be combined into an overall ranking. Two that will be discussed here are:

- Top-down frequency
- Average ranking

Top-down Frequency

The top-down frequency method ranks projects by category based on the project with the highest number of top rankings for each priority. Ties are broken by the next level of ranking for each priority. This process is carried out until all projects are uniquely ranked. The advantage of this method is that it guarantees that the most popular project in each category will be ranked first; however, this also means that the method is influenced more by higher rankings than low ones, since the lower rankings are only reached if projects are tied for the highest ranking.

Average Ranking

The average ranking method uses the average ranking given to each project for each category. All rankings given to a project for each category are averaged and the average ranking for each category is used as the overall ranking for that category. Ties can be broken based on the variance of the category's overall average ranking for the tied projects, since higher variance for the same average means there is less consensus. The advantage of this method is that it takes all rankings into account; however, this also means that extreme rankings will have more influence than rankings near the group average.

5.6.2 Agree on projects to fund

The amount of money available to fund the projects must be considered once the projects have been ranked to the group's satisfaction. The representative board of the SUD would vote on all regional projects to determine which are to be funded by the district.

5.7 Case Studies

There are over 30 years of experience with the development and operation of stormwater utilities or districts in the United States. This experience has proven that improved services and significant efficiencies are possible with the establishment of an SUD. As a basis for comparison, two example case studies are identified for consideration if the decision is made to move forward with implementation. These include the Long Island Sound Watershed Intermunicipal Council (LISWIC) in Westchester County, New York and Sanitation District Number 1 (SD1) of Northern Kentucky, located south of Cincinnati, Ohio. Each of these programs is briefly described below. Additional details can be provided if the SUD is selected for implementation.

5.7.1 Long Island Sound Watershed Intermunicipal Council

The LISWIC program is very similar to the situation with the WNYSC. This group has operated for several years using a voluntary intermunicipal agreement to support and guide activities related to the MS4 stormwater NDPES permitting program. During 2007 they completed a study very similar to one presented in this report and decided to pursue the creation of an independent SUD. They are now in the process of seeking state legislation to establish the SUD and begin implementation. This group is expected to include 6 to 12 municipalities, depending on who agrees to participate.

5.7.2 Sanitation District Number 1

Sanitation District Number 1 of Northern Kentucky is a regional wastewater utility that began the process of developing and implementing a regional SUD in 1998. This program has evolved over the years and today includes 35 municipalities and encompasses a service area of 230 square miles. Initially the SUD contracted to provide defined levels of stormwater management services for each municipality with ownership

by the municipality. However, beginning July 1, 2009, the stormwater assets have been transferred from the municipalities to the SUD.

Section 6. Legal Issues

6.1 Functions of the Stormwater Utility District (SUD)

There is no definition of a stormwater utility district in New York law. The concept of a SUD is used in other states but the exact functions that it performs differs from jurisdiction to jurisdiction.

The approach taken in this study was to survey the participating municipalities to determine what functions they believed should be vested in a regional SUD. Those functions are listed below and categorized into convenient groupings.

6.1.1 Advise and Consultation Related to MS4 Requirements and Public **Education and Outreach.**

a. Provision of regulatory update assistance.
b. Updating stormwater management plans (SWMP).
c. Preparation of annual reports required by the MS4 program.
d. Coordinating public participation functions.
e. Training inspectors to perform construction inspections.
f. GIS data management.

6.1.2 Field Work Associated with MS4 Requirements.

g. Assistance in performing audits of municipal facilities.
h. Inspection of outfalls.
i. Illicit discharge detection and elimination.
j. Dredging detention ponds.

6.1.3 Regional Stormwater Issues

k. Adopting regional design and operating standards for stormwater management.
l. Mitigating regional flooding, drainage and water quality problems.
m. Maintenance of creeks and streambeds.

6.1.4 Financing Activities

n. Establishing user fees to finance activities.
o. Distribution of some of the user fees to participating municipalities to cover the local share of the MS4 program costs.
p. Using the system of delinquent tax enforcement for unpaid user fees.
q. Using the billing system for tax collection.
r. Seeking out and applying for grants.

6.2 Scope of Issues Considered

The study being conducted is intended to provide the participating municipalities with an analysis of the basic feasibility and advisability of creating a regional SUD. It is not

intended to address the more detailed questions that would arise in the context of actually forming such a district.

Based on the functions the municipalities desire to vest in a SUD, this report examines the ability of entities that are already authorized under New York law to perform these functions. It also discusses other entity types that would require state legislation. Finally, it compares the advantages and disadvantages of bolstering the authority of entities already authorized under New York law versus adopting legislation to establish a new entity.

6.3 Entity Types Considered

Presently, New York law provides for a number of entities[1] that can address stormwater issues. For purposes of this study, only entities or approaches that can provide the stormwater functions on a regional basis were considered.

Among existing entities, the authorities of county drainage districts,[2] soil and water conservation districts and collective action through intermunicipal agreements were analyzed. These entities can be established without any state legislative action. However, in order to fulfill all of the desired functions, these entities may require legislation that expands their existing authorities.

Alternatively, there is a framework for creation of different types of entities through state legislative action that could be used for the regional SUD. Public Authorities Law Article 5 contains enabling legislation for a variety of Public Utility Authorities. The public authorities formed under this law are generally in the categories of sewer, water or power utilities. Presently, there is only one public utility authority with a stormwater mandate, the Nassau County Sewer and Storm Water Finance Authority.[3]

Public authorities are generally created to facilitate the financing of capital facilities. The functions envisioned for the SUD include the mitigation of regional flooding, drainage and water quality problems and the maintenance of creeks and streambeds. These are activities which might result in the construction, ownership or acquisition of capital facilities. However, it is not certain at this point that this would be the case.

Therefore, if state legislation is sought, other models could be considered. The Legislature could provide a general legal framework for the SUD and then further

[1] The term "entity" is used for convenience and signifies the legal vehicle for conducting stormwater activities. Neither the formation of a county district nor the adoption of an intermunicipal agreement result in a separate legal entity. The county district is legally a department of county government. The intermunicipal agreement entails the cooperative exercise of authority that all of the member municipalities already possess.

[2] Although the analysis of the county district alternative is focused on drainage districts formed under County Law Article 5-A, consideration will also be given to flood and shoreline erosion districts (County Law Article 5-B) where appropriate.

[3] Public Authorities Law §§1232-1232-u.

authorize specific entities as it does with industrial development agencies (General Municipal Law (GML) Article 18-A) or urban renewal agencies (GML Articles 15-A and 15-B). Another model would be for the Legislature to provide the legal parameters under which the desired entity type would operate and then authorize municipalities to form individual conforming entities through local action. Such an approach is currently available for municipalities to establish joint waterworks.[4]

If the decision is made to seek state legislation, a further analysis of which approach is best would be needed. The specific functions of the entity would need to be defined with more precision and, in all likelihood, a key factor would be whether the new entity would be used to finance and own any of the regional stormwater infrastructure.

6.4 Advise and Consultation on MS4 Requirements and Public Education and Outreach

The functions in this category are:

a. Provision of regulatory update assistance.
b. Updating stormwater management plans (SWMP).
c. Preparation of annual reports required by the MS4 program.
d. Coordinating public participation functions.
e. Training inspectors to perform construction inspections.
f. GIS data management.

These functions result directly from the mandates of the MS4 program. Because these requirements are different from the drainage-related functions historically performed by government, New York statutes generally do not specific make explicit mention of these functions. For the most part, municipalities subject to the MS4 program have assumed there is implied authority to perform these functions pursuant to some combination of their general powers and specific grants of authority to address drainage, at least as they relate to facilities they own and which are subject to the permit requirements.

With respect to the entities being considered in this study, it is reasonable to conclude that they too would have implied authority to perform these functions, at least with respect to facilities they own. In addition, the county districts or the individual municipalities could perform these functions on behalf of each other pursuant to an intermunicipal agreement.[5]

Soil and water conservation districts have general authority in two areas relevant to this study. They may (1) conduct surveys, investigations and research relating to the character of soil erosion, floodwater, sediment damages, nonpoint source water pollution, and the preventive and control measures needed; and (2) carry out the aforementioned preventative and control measures.[6] These functions may be carried out on behalf of facilities they own or other facilities with the consent of the owner. To the extent that

[4] Unconsolidated Laws, Title 16, Chapter 19.
[5] GML §119-o(1).
[6] Soil and Water Conservation Law Districts (S&WCD) Law §§9 (1) and (2).

these functions fall within one or both of these areas of their authority, a soil and water conservation district could perform these function of behalf of others. Because the specific MS4 functions were not envisioned when the S&WCD Law was adopted, there is some ambiguity over whether all of these functions would be encompassed.

6.5 Field Work Related to MS4 Requirements

The functions in this category are:

g. Assistance in performing audits of municipal facilities.
h. Inspecting outfalls.
i. Illicit discharge detection and elimination.
j. Dredging detention ponds.

Any of the entities can and must audit and inspect their own facilities as well as conduct necessary maintenance dredging as part of their ownership and permit obligations. The county districts and/or any combination of the participating municipalities could also do so on behalf of each other as part of an intermunicipal cooperative agreement under General Municipal Law Article 5-G. As indicated above, to the extent that these functions fell within the two principal areas of authority, a soil and water conservation district could perform the same measures for the facilities of others.[7]

The illicit discharge protection and elimination function is law enforcement in nature. It requires inspecting properties, even in situations where there may be no owner consent. It also requires the ability to take enforcement action where illegal discharges are detected.

These functions are implemented through the adoption and enforcement of a local law containing the requirements for use of the stormwater system. Since the stormwater systems will remain under the ownership of individual municipalities, the question is whether any of the candidate entities could perform these law enforcement functions on the individual municipal owners.

As discussed above, the General Municipal Law provides that municipalities can perform services jointly or one on behalf of another.[8] The term "joint service" is defined as,

> joint provision of any municipal facility, service, activity, project or undertaking or the joint performance or exercise of any function or power which each of the municipal corporations or districts has the power by any other general or special law to provide, perform or exercise, separately and, to
> effectuate the purposes of this article, shall include extension of appropriate territorial jurisdiction necessary therefore.

While the language would appear broad enough to encompass the provision of these enforcement-like functions, there is no known circumstance where municipalities have

[7] S&WCD Law §9(2).
[8] GML §

entered into an intermunicipal agreement providing for one to enforce the laws of another. There are certain components of the enforcement that have been held to be non-delegable to a private entity.[9] Whether these aspects of enforcement could be delegated to a different public entity remains untested.

Soil and water conservations districts cannot enter into intermunicipal agreements pursuant to GML Article 5-G and have no other authority to perform these enforcement functions.

6.6 Regional Stormwater Issues

6.6.1 Adopting Regional Design and Operating Standards for Stormwater Management.

There are three approaches to adopting such standards. It could either be done as under regulatory authority, contractually or as a proprietary matter.

Regulatory authority is not available as none of the regional entities being considered has regulatory jurisdiction. The basic regulatory jurisdiction in this field rests with NYSDEC.

The regional entity could adopt recommended or model standards. It would then be up to each individual jurisdiction to adopt and implement those standards. It would be possible to make the adoption of such standards a contractual requirement of an inter-municipal agreement. However, any of the participating municipalities could withdraw from the agreement and even if they did not withdraw, it would be difficult to take effective action if any of them failed to implement the standards.

Finally, uniform standards could be adopted if all of the municipal infrastructure were placed under the jurisdiction of the regional entity as an incidence of ownership. Based on the feedback from the participating municipalities, the stormwater infrastructure will not be placed under the jurisdiction of the regional SUD, except possibly in specific cases where regional issues are implicated.

6.6.2 Mitigating Regional Flooding, Drainage and Water Quality Problems.

There are two approaches by which a regional entity could address regional flooding, drainage and water quality problems. It could do so as owner of a regional flood, drainage or water quality project or it could be done through the provision of services to the owner.

Either a county drainage or county flood and erosion control district has the authority to conduct such activities for projects it owns. These districts could also enter into an intermunicipal agreement pursuant to either General Municipal Law Article 5E (governing construction of excess drainage facilities by one municipality to aid another);

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Article 5F (governing construction of drainage facilities owned in common by multiple municipalities); or Article 5G (governing municipal cooperative agreements generally).

Similarly, local governments could likewise perform such functions pursuant to an intermunicipal agreement with respect to projects they owned or on behalf of projects owned by other municipalities that were participating in the intermunicipal agreement.

Soil and water conservation districts have authority to construct and maintain flood control structures, although they have no clear funding mechanism for doing so.[10]

6.6.3 Maintenance of Creeks and Streambeds.

County drainage and county flood and erosion control districts have the authority to perform such maintenance in support of drainage or flooding improvements which such district owns or on behalf of others pursuant to an intermunicipal agreement. Local governments could likewise perform such functions on their own behalf or on behalf of others pursuant to an intermunicipal agreement. In all cases, to the extent that work was being performed on private lands, they would either require landowner consent or need to take the necessary property rights by eminent domain.

Soil and water conservation districts have the authority to carry out preventative and control measures on both public and private lands.[11] In doing so, they must obtain the consent of the landowner. As a condition of doing any authorized project work, the district may require contributions in money, services, materials or otherwise from benefitted owners.[12]

6.7 Financing Activities

6.7.1 User Fees

There is no general definition in New York statutes for the term "user fee." Several statutes use the term "rents" or "rates" equivalently.[13] General Municipal Law Article 14-F provides authorization for all municipalities to adopt user fees in the form of sewer rents. It defines sewer rents as "A scale of annual charges …..for the use of a sewer system or any parts thereof."[14]

Various judicial opinions and opinions of the state comptroller have defined the essential elements of a user fee. It must have two characteristics: (1) only those who use the

[10] S&WCD Law §9(2).
[11] S&WCD Law §9(2).
[12] S&WCD Law §9(10).
[13] GML Article 14-F is entitled "Sewer Rent Law"; Town Law §198(1)(i) refers to "sewer rents."; Town Law §198(3)(d) refers to "water rates"; County Law §266.
[14] GML §451(1).

service can be charged; and (2) the charge/fee must bear a rational relationship to the use or benefit.[15]

A user fee can be used to recover the costs of providing a service but cannot be used to generate funds beyond those costs to offset other governmental costs.[16] The municipality can set varying rates based on varying benefits so long as there is a rational basis for doing so.[17]

In the context of stormwater services, there are three sources of authority for imposing user fees or their equivalent – (1) explicit statutory authorization; (2) pursuant to home rule authority; and (3) benefit assessments that are the functional equivalent of user fees.

6.7.1.1 Explicit Statutory Authority

The only explicit authorization for user fees for drainage improvements is found in Town Law §209-q(12-a). That law states that these user fees are to be established in the same manner as provided for the establishment of water rates in Town Law §198(3)(d). Unlike the General Municipal Law Article 14-F which is very specific on the criteria for setting user charges for waste water facilities, Town Law §198(3)(d) contains very little guidance on the setting of user fees for water supply facilities (i.e. water rates).

Significantly for this study, none of the entities that are being considered for the regional SUD have similar explicit authority.

6.7.1.2 Home Rule Authority

Because New York is a "home rule" state, there are statutory provisions that give municipalities the authority to adopt local laws that go beyond or differ from explicit authorizations contained in laws that provide their basic authority, such as the County, General City, Town and Village Laws.[18] The principal limitations on the use of this power is that it not be inconsistent with the state constitution or any law of general applicability or be in an area where the Legislature, either explicitly or implicitly, prohibited the use of such power.[19]

Of the entities being considered in this study, the home rule powers could only be exercised by counties, cities, towns and villages to the differing extents authorized for each. They could not be used by a soil and water conservation district.

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[15] Opinion of the State Comptroller (OSC) 94-17; OSC 92-18; Elmwood – Utica House, Inc. v. Buffalo Sewer Authority, 65 N.Y.2d 489, 492 N.Y.S.2d 931 (1985); Watergate II Apartments v. Buffalo Sewer Authority, 46 N.Y.2d 52, 412 N.Y.S. 2d 821 (1978).

[16] OSC 92-18; cf., C.I.D. Landfill, Inc. v New York State Department of Environmental Conservation, 167 A.D.2d 827, 561 N.Y.S.2d 936 (4th Dep't. 1990).

[17] OSC 92-18; Elmwood-Utica House.v Buffalo Sewer Authority, 66 N.Y.2d 498, 492 N.Y.S.2d 931 (1985).

[18] The source of authority for these powers in Article IX of the State Constitution and the Statute of Local Government. The enumeration of these general authorities is in the Municipal Home Rule Law (MHRL).

[19] MHRL §10(1)(i) and (ii).

The home rule authority allows municipalities to tailor requirements to local needs. Of particular relevance to financing stormwater services is the following authority from Municipal Home Rule Law §10.

> Fixing, levying, collection and administration of rentals, charges, rates, fees, and penalties with respect to local property and programs. (1)(ii)(a)(9-a).

In theory, this authority could be used by counties to impose user fees for stormwater services. However, in light of specific language in County Law §§270 and 271 which authorize the use of assessments either based on property values (*ad valorum*) or property service benefits, it is virtually certain that county drainage districts imposing user fees would be invalid as inconsistent with these provisions of the County Law (both laws of general applicability).

6.7.1.3 Benefit Assessments which are the Functional Equivalent of User Fees

There are three approaches used in New York for raising funds from benefited areas (as contrasted with municipality-wide charges) to defray the capital costs and operation and maintenance expenses relative to a public improvement. These approaches are: special *ad valorum* levies, special assessments and user fees. The special *ad valorum* levy is charged apart from taxes but, like taxes, is based on the value of the real property assessed.

Benefit assessments (referred to in statute as "special assessments") are "..charges imposed upon benefited real property in proportion to the benefit received by such property to defray the cost, including operation and maintenance, of a special district improvement or service or of a special improvement or service."[20] Courts have repeatedly held that the benefit a property receives means the amount by which its value is increased by the improvement.[21]

For purposes of establishing the benefit assessment, there is no requirement that the measurement of the property value increase be precise.[22] If no method is provided by statute (which is the case for drainage districts), it is up to the discretion of local officials to establish the methodology.[23]

Many different approaches have been taken to derive benefit assessments. It is very difficult to successfully challenge a methodology as its selection is legislative in nature.[24]

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[20] Real Property Tax Law (RPTL) §102(15).

[21] Kermani v. Town Board of Guilderland, 47 AD2d 694, 364 NYS2d 251 (3d Dept. 1975), reversed on other grounds, 40 NY2d 854, 387 NYS2d 1001 (1976); In re West 231st St in City of New York, 160 A.D. 472, 145 N.Y.S. 537 (1st Dept. 1914), aff'd 212 N.Y. 590 (1914). 99 NY Jur Taxation and Assessment §868.

[22] YMCA v. Rochester Pure Water District, 37 NY2d 371, 372 NYS2d 633 (1975).

[23] 99 NY Jur Taxation and Assessment §865.

[24] DWS v. County of Dutchess, 110 A.D.2d 837, 487 N.Y.S.2d 870 (2d Dep't. 1985).

The basic requirements are that it not be arbitrary or unjust so as to amount to a confiscation of property.[25] Since none of the statutes relating to drainage improvements direct the use of a particular methodology, so long as the basis for assessment is derived from value of the benefit of the improvement, any rational theory or principle that determines benefits may be used.[26] There are no known opinions in New York regarding specific methodologies for assessing benefits for drainage improvements.[27]

In the context of sewer and water services, there is a sharp distinction between benefit assessments and user fees. This is so because in the case of water and sewer services, use can be measured directly. Moreover, the user has the ability to increase or decrease usage. However, in the case of drainage services, usage can only be measured indirectly and the user has little if any control over usage. Given the broad discretion for developing the benefit assessment methodology, it is possible that the same methodologies developed in this study for establishing user fees could be used as an acceptable surrogate to determine benefit assessments.

For instance, a typical user fee formula might be derived by using the percentage of impermeable surface on a property. This approach is considered a reasonable surrogate for the "use" of stormwater services by that property. When the formula is applied, the result is a use value for each property. That property's stormwater user fee will be set as the ratio of its use value to the total use in the system. If the application of the formula concludes that a property has a use value of two and the use value of all benefited properties is two thousand, then the property will pay 2/2000 or 0.1% of the assessed cost.

In the same setting, an analogous formula might also be considered to be a reasonable surrogate of the amount that property's value increased due to the stormwater improvement. In other words, using the same formula based on impermeable surface, the assessing authority could rationally conclude the property's value increased to a degree which constituted 0.1% of the total increase in value of all benefited properties. In such a case, the application of benefit assessment would result in the identical distribution of costs among properties as would the application of a user fee. So long as using the same formula to estimate percentage use and estimating percentage each have an independent, but justified, rational basis, the use of the formula would be valid.

This may simply be a short way of saying that "use" of stormwater services as defined by using a formula based on impermeable surface may be rationally related to the increased value of the property because of the availability of the stormwater infrastructure. The more impermeable surface a property has, the more it benefits (i.e. the more its value increases) because of the presence of stormwater infrastructure.[28]

[25] OSC 87-64.
[26] 99 NY Jur Taxation and Assessment §867.
[27] See e.g., Town of Onondaga v. County of Onondaga, 61 A.D.2d 1124, 402 N.Y.S.2d 883 (4th Dep't 1975).
[28] This is acknowledged to be an oversimplification because any "user" formula that was adopted might well contain more factors than just total impermeable surface area (e.g. it might involve the ratio of permeable to impermeable surface area). However, the same principle would hold so long as the

If such were the case, a county drainage district could effectively set charges on the same basis recommended in this study but such charges would be denominated benefit assessments rather than user fees.

Even if the methodologies for deriving user fees and benefit assessments were identical, there are a few differences with respect to how the charges would be implemented. User fees can only be charged where there is actual use of a service. Hence, parcels that are not draining into public stormwater infrastructure cannot be charged a user fee. Also significant is that user fees apply to properties that would otherwise be exempt from real property taxation, such as properties owned by churches and certain not-for-profits.

By contrast, benefit assessments can be charged against properties that are not currently using the service so long as the property value of those properties is increased from the presence or proximity of such services. For instance, properties in a water district that continue to use private wells and are not hooked up to public infrastructure are still subject to a benefit assessment as the ability to hook up to public infrastructure increases the value of the property.

Exemption from benefit assessments is governed by Real Property Tax Law §490. That section exempts many of the same properties from these charges that are exempt from property taxes. However, these exemptions are only applicable where the levy is to pay for operation and maintenance charges.[29]

6.7.2 Distribution of Some of the User Fees to Participating Municipalities to Cover the Local Share of the MS4 Program Costs.

At the outset, it is important to note that, for most of the municipalities participating in this study, stormwater services are currently being funded through general tax revenues. There are few situations where special *ad valorum* levies, special benefit assessments or users fees are being employed. As a result, there is no discrete accounting for these services. If user fees were to be collected at the county or regional level prior, there would first need to be a discrete accounting for all of the costs apart from the general operations of those governments.

Once the charges were determined, a user fee could be set based on the adopted methodology. The questions that then need to be addressed are (1) could those charges could be collected by the county or regional SUD?; and (2) if so, is there a mechanism whereby a portion of the user fees assessed by the regional SUD could be retained by the regional SUD (to implement the tasks laid out in this report) and the rest distributed to local governments (to implement all remaining requirements)?

methodology for deriving use could also rationally be applied as a way to derive benefit assessments as well.

[29] See also, YMCA v. Rochester Pure Waters District, 37 NY2d 371, 372 NYS2d 633 (1975).

6.7.2.1 Collections

In New York, collection officers of towns and cities act as collection agents for taxes assessed by other municipalities and districts.[30] The collecting officer of either the town or city is responsible for mailing tax bills based on the tax warrants received from the various taxing jurisdictions.

This process is exclusive to taxes and special levies and assessments that are treated as taxes. There is no process in New York for an entity to collect user fees that are assessed by another entity, let alone any of the regional entities under consideration here. Hence, this function would require new legislation.

6.7.2.2 Distribution of Collections

When tax payments are received, the collecting officer makes specified payments to the person designated in the warrant, including those from other jurisdictions.[31] As discussed above, there is no authority in New York to follow this procedure for user fees. Nor is there any authority to apportion payments that are issued pursuant to a single warrant. This function would require new legislation.

6.7.3 Using the System of Delinquent Tax Enforcement for Unpaid User Fees.

Since user fees are regarded as a payment for services provided, any delinquency can be enforced as a breach of contract. By statute, unpaid sewer and water user fees are also liens upon the real property. Provision is also made for the enforcement of delinquencies for these user fees in the same manner that enforcement against delinquent real property taxes is done.[32]

With respect to user fees for stormwater services, the only explicit authorization for user fees for drainage improvements does not specify how they can be enforced.[33] Therefore, any authority to enforce against delinquencies other than through breach of contract actions would need to be based on a local law adopted under the Municipal Home Rule Law.

There is general authority under the municipal home rule law for municipalities over the " …fixing, levy, collection and administration of local government rentals, charges, rates or fees, penalties and rates of interest thereon, liens on local property in connection therewith and charges thereon."[34] There is no doubt that a municipality could adopt a local law that would make unpaid stormwater user fees liens on the properties upon

[30] RPTL Article 9, Title 3.
[31] RPTL §940.
[32] GML §452(4) in the case of sewer rents and see e.g. Town Law §198(3)(d) in the case of water rents.
[33] Town Law §209(q)(12-a) authorizes drainage rents and specifies that they be established as provided for water rates as provided for in Town Law §198(3)(d) but it is silent on whether the enforcement mechanisms set forth in that statute are applicable.
[34] MHRL §10(1)(ii)(a)(9-a).

which they were assessed.[35] However, the Comptroller has opined that when delinquent user charges are collected by inclusion in the tax levy, the charges become indistinguishable from and inseparable from the taxes themselves.[36] As the State Constitution vests the State Legislature with the sole authority to impose taxes, the exercise of the home rule powers to extend the use of the delinquent tax enforcement system would be invalid due to inconsistency with Constitution.[37] Only where the State Legislature has explicitly authorized collection for a debt other than a tax via the delinquent tax enforcement process can this procedure be used.[38]

It is worth mentioning that if the charges are implemented as benefit assessments rather than user fees (see Section 10.7.1.3), delinquent payments would be handled under the delinquent tax enforcement process (see RPTL §1102(2) which defines to include an unpaid special assessment).

6.7.4 Using the Billing System for Tax Collection.

Although the delinquent tax collection process is not available for user fees outside of those situations where explicitly authorized, there is authority for using the real property tax billing system for user fees.[39] In order to do so, the municipality would need to adopt a local law to that effect.

In order to use the tax bill, there would have to be several accommodations. The user fees would have to be listed separately.[40] A property owner would have to be allowed to pay his or her tax bill without paying the user fees at the same time.[41] The penalty and interests that apply to delinquent taxes would not automatically apply to delinquent user fees but would have to be determined separately.[42]

6.8 Enhancing Authority of Entities Authorized under NY Law vs. Creating a New Entity Type

No existing entity authorized under New York law has the legal authority to perform all of the functions that would be assigned to the regional entity. Therefore legislation will be required. The primary choice is between augmenting the authority of an entity already authorized under state law or creating a new entity.

There are advantages associated with using an existing entity type. Such an entity either would be in existence (e.g. the Coalition formed by the Intermunicipal Agreement) or would be one that could be formed under local authority without the need for any state legislation (e.g. a county drainage district).

[35] OSC 86-76
[36] OSC 86-76
[37] OSC 2004-7; 86-76
[38] See, e.g. GML Article 14-F
[39] OSC 88-2.
[40] OSC 76-1115.
[41] OSC 88-2.
[42] OSC 88-2.

In the former case, there would be an existing administrative structure. Certain start up costs can be avoided and duplication of administrative functions can be reduced. In the latter case, even where the entity has not yet been established, experience with similar such entities would provide valuable experience in establishing and administering the entity (e.g. drainage districts).

There are also some disadvantages associated with using an existing entity. From a legal point of view, the expansion of the authority of a legal entity must be done carefully so as not to impact existing authorities in an inappropriate way. For instance, the use and definition of terms in its enabling legislation must be consistent throughout. Even when drafted with the utmost care, there are sometimes unintended consequences when one statute is superimposed on another.

From an organizational point of view, such an approach may create conflicting priorities. For instance, soil and water conservation districts were set up principally to help with flooding problems in rural areas, particularly where agriculture is being conducted. By contrast, the MS4 program is focused on the water quantity and quality aspects of stormwater runoff in urbanized areas.

The creation of a new entity through state legislation would involve start up costs. Some of the entities types requiring legislation have sister entities (e.g. Public Utility Authorities) which would provide a model for operating. The most significant advantage of a new entity would be the ability to tailor both its mission and its legal authority to the specific needs of participating municipalities.

On balance, due to the unusual set of powers that would be vested in the regional SUD, it is preferable to establish a new entity type.

6.9 Summary and Conclusion

The activities categorized as “Advise and Consultation to MS4 Requirements” and “Public Education and Outreach” could be provided by any of the candidate entities. Existing law predates the MS4 program and many of the specific activities are not explicitly authorized but would likely fall within the general or implied authorities for these entities.

Likewise, the “Field Work” activities could be performed by any of the candidate entities with the exception of the illicit discharge detection and elimination. A county drainage district or an intermunicipal compact might be able to perform the illicit detection and elimination function on behalf of the system owner pursuant to a GML Article 5-G agreement. Soil and water conservation districts have no authority to perform enforcement functions.

Among the regional stormwater management issues, the only one which would represent a problem is the adoption of regional design standards. Although any of the entities

could adopt standards, those standards would only be used to the extent accepted by the owners of all the municipal stormwater systems.

There is no good authority to establish a system of user fees to fund the activities of the regional entity although individual municipalities could create drainage districts that would fund program functions through a benefit assessment that would have many of the same characteristics as user fees. However, even if this approach were taken, there is no reliable mechanism to place the regional entity in charge of collecting those assessments and distributing designated percentages of those fees to individual municipalities.

Given the limitations on existing authority and the ambiguities in other areas, the most direct route to the desired result is through the adoption of enabling state legislation. The legislation could either clarify and bolster the authority of one of the entity types described in this chapter or it could authorize the creation of an entity intended to serve as the regional SUD.

If the latter approach is chosen, there is a further decision between legislation that is specific to the needs of the localities in this study and legislation that provides a more general framework for regional entities that will perform stormwater functions. If the legislation is going handle a diverse set of circumstances that would arise for different municipalities throughout the State, the help of one of more of the municipal associations could be enlisted to seek such legislation.[43]

[43] The obvious candidates would be the Association of Counties, Association of Towns and the New York Conference of Mayors. Interestingly, NYCOM included the need for legislation for stormwater utilities on its legislative agenda for this year.

Section 7. Public Participation

Throughout the development of the feasibility report, the Team has worked to keep representatives of the MS4's involved in this project. In the early stages of the project, the feasibility of an SUD was discussed at numerous meetings of the Western New York Stormwater Coalition. During the Data Collection phase, the Team interviewed a representative of each MS4 to get individual input on the concept of a regional SUD. Throughout the term of the project, status reports were presented at the monthly meetings of the coalition. More formal presentations of the feasibility study were given as power point presentations during two of the monthly meetings of the WNYSC. Public comments and questions were received at each of these meetings.

As the feasibility study neared completion, a power point presentation was developed to educate the municipal officials and general public on the feasibility of an SUD. A copy of that presentation is given in Appendix G. The WNYSC then asked each member of the coalition if they were interested in having the feasibility study presentation given to their public officials. Half of the communities in the WNYSC asked to have the presentation offered to their communities. This list included:

- Village of Alden
- Town of Amherst
- Village of Angola
- Town of Boston
- Buffalo Sewer Authority
- Village of Depew
- Town of Eden
- Town of Elma
- Town of Grand Island
- Village of Hamburg
- Village of Kenmore
- City of Lackawanna
- Town of Orchard Park
- Village of Orchard Park
- Village of Sloan
- City of Tonawanda
- Town of Cambria
- Niagara County
- Town of Niagara
- City of North Tonawanda
- Town of Wheatfield

In these meetings, the power point presentation was given to the municipality and members of the public in attendance at these meetings. Responses to the presentation varied widely, and the following are some general comments received from these meetings:

- As anticipated, the largest issue discussed at these meetings was fees. Most municipalities cannot support the idea of additional fees for an SUD in the current economy. They understood that these fees would help offset their costs for stormwater, but these costs are already accounted for in their budgets.
- Another concern raised about the fees was a general fear that once the money was collected by the SUD, it would not be returned to the communities but would be used for administration, political purposes and patronage jobs. The communities were also concerned that the fee would be increased quickly after starting the SUD.
- Some municipalities were very angry with the current stormwater permit requirements. They feel that this is an unfunded mandate and they do not believe that they should have to ask their residents and businesses to pay for more stringent stormwater permit requirements. In their opinion, the public does not understand the potential negative environmental effects of stormwater runoff and will not pay for it.
- A limited number of small municipalities were very interested in the idea of an SUD as they are concerned that they do not have the resources as a small community to keep up with the requirements of the stormwater permit.
- Most municipalities were concerned with understanding how an SUD would prioritize projects when dealing with regional issues. Smaller communities were concerned that the larger communities would dominate the process when determining which projects get funded. Similarly, communities in Niagara County were concerned that Erie County projects would dominate due to the higher percentage of communities and population in Erie County.
- Most municipalities saw the benefit of working together as an SUD to handle regional issues, specifically flooding. Some communities brought up the idea of creating an SUD to only handle regional issues, not long-term funding of their stormwater programs. Others thought that municipalities should work together on these regional issues, but they can be dealt with using intermunicipal agreements instead of an SUD.
- The general concept of how the SUD fee would work was a bit difficult for many municipal officials to understand. Using impervious area as a way to calculate a fee was new to most and generated many questions. The municipal officials wanted to understand how duplexes and apartments would be counted and also what properties might be eligible for green infrastructure credits. There were also questions regarding not-for-profit organizations and municipal-owned property.
- Municipalities also asked many questions about the structure, bylaws, and specific distribution of funds in an SUD. These questions could not be answered specifically as part of this feasibility study; only general concepts could be explained. If a large enough group of municipalities decides to go forward with a regional SUD, a specific structure, bylaws and detailed plan for distribution of funds would need to be developed as a second phase to this feasibility study.

These meetings were helpful in explaining the idea of an SUD to the municipal officials and the public, but they did not change the public opinion on an SUD. The majority of

the municipal officials and general public were against the formation of an SUD in Erie and Niagara Counties. The SUD was perceived as a new layer of government with increased fees and less local control. The benefits of mitigating regional flooding and water quality problems, providing long-term funding, and assisting the municipalities with meeting the requirements of the stormwater regulations through an SUD were not perceived to be large enough to offset the negatives.

Section 8. Conclusions and Recommendations

Looking at all of the information provided in the previous sections, creating an SUD for Erie and Niagara Counties is feasible. The data collected shows that revenue generated by a nominal fee of $3.00/ERU/month can cover the costs of operations and maintenance of the stormwater system while also providing additional funding to address regional flooding and regional water quality concerns.

If the region decided to go forward, it is recommended that the SUD be formed as a separate entity. Other organizational structures investigated lacked the flexibility to distribute funding back to the municipalities. The creation of a stormwater utility is new in New York State and presently is not covered by current laws. Therefore, new legislation will be needed for the creation of an SUD. However, it is expected that this legislation can be adopted.

8.1 Compelling Needs for an SUD

As part of this feasibility study, the compelling needs for an SUD were also investigated. Four compelling needs were documented:

1) An SUD would provide a sustainable revenue source for stormwater programs. Most of the MS4 communities in Erie and Niagara County do not have established, separate funding sources for their stormwater programs. Without an established, separate funding source, stormwater programs required by the MS4 permit may be difficult to sustain into the future.
2) An SUD would assure regulatory compliance. As mentioned, without an established funding source, it is more likely that stormwater programs will not remain in compliance. Violations of the stormwater permit can be presently enforced by the NYSDEC with fines as much as $37,500 per violation, per day.
3) An SUD would address regional flooding concerns. Flooding is a major issue in both Erie and Niagara Counties. Individually, the municipalities have a difficult time addressing these flooding issues as they need to be tackled by all of the communities within the watershed. An SUD would work with the municipalities to reduce these flooding issues using a regional approach.
4) An SUD would address regional water quality issues. Water pollution impacts the beaches and water bodies of the region. Some of this pollution is associated with stormwater. Working regionally, an SUD would work with the municipalities to reduce stormwater pollution.

8.2 Advantages and Disadvantages to an SUD

An SUD has advantages and disadvantages. The advantages include:

- An SUD provides a dedicated funding source. As previously identified a dedicated funding source will help the municipalities remain in compliance with the stormwater permit.

- There is an increased opportunity for grant funding with the SUD. Regional approaches used with the WNYSC have been effective in receiving grant funding. It is anticipated that the SUD will be able to receive similar grants for the municipalities in the future.
- Consistent approaches to stormwater management are more likely under an SUD. This will lead to more effective and more efficient solutions to stormwater management within the SUD.
- By taking a regional approach through the SUD, Erie and Niagara County would encourage watershed based planning. This is a very effective way to reduce flooding and limit water pollution in the region.

The SUD does have some disadvantages that should be noted and these include:

- There may be less local control of stormwater management in Erie and Niagara County. This limited loss of local control is outweighed by the benefit of an SUD in tackling regional issues that cannot be addressed by the local entities.
- The SUD may be thought of as a new layer of government. By using the WNYSC as the basic building block of the SUD, it is hoped that this disadvantage can be limited.
- There will be public resistance to new fees for an SUD. The majority of the new fee for an SUD is replacing existing costs of stormwater management within the community. Approximately $2.30 of the $3 proposed fee will be used to pay for the costs of local stormwater operations and maintenance programs. Therefore, some of the costs at the local level may be reduced, limiting the impact of the new SUD fee.
- New state legislation will be needed to create the SUD. Although this will take time and effort, it is believed that legislation can be passed to create the SUD needed for Erie and Niagara County.

8.3 Next Steps

It has been determined that it is feasible to create an SUD in Erie and Niagara Counties. However, feedback from elected officials at the public meetings has shown that there is not enough of a compelling need at this time to move forward with Phase 2 of the project. In the public meetings, communities supported the idea of an SUD, but could not support the new fees associated with an SUD. At this time the communities will continue to work locally to operate and maintain their stormwater systems. Therefore, the Team will not move forward at this time to Phase 2 of forming an SUD.

At the onset of the feasibility study, there were three major needs that a dedicated source of funding through the formation of a utility district could address:

1. A dedicated source of funding at the local level to cover the cost of implementing the necessary programs to comply with the MS4 permit requirements;

2. Continued support for the WNYSC to continue to coordinate the public outreach, annual report template, trainings and other regional services that assist the MS4s in Erie and Niagara Counties with understanding and complying with the permit requirements; and
3. A committed funding source for capital improvement projects that could address regional flooding and water quality improvement needs.

Based on the comments and feedback provided regarding the feasibility study, the majority of the MS4s have opted to fund their individual stormwater permit programs at the local level. This will be accomplished from resources budgeted through municipal general funds or drainage districts and subsidized, in some cases, through fees. The political and public support for instituting an additional tax or fee structure to provide a separate, dedicated source for stormwater programs does not currently exist. It is recommended, however, that each of the MS4 communities ensure that they have adequate long-term revenue sources to fund the required stormwater management activities within their municipality.

Without the creation of a Stormwater Utility District, which would generate a committed source of funding for the WNYSC, MS4s will have to continue to rely on their annual dues and any grants the Erie County Department of Environment and Planning can obtain to support the coalition activities. The current annual rate may need to be raised, if the necessary grant funding is no longer available. Many comments were received from municipal representatives and elected officials during this study highlighting the success of the Coalition.

The availability of capital funding for flood mitigation and water quality improvement projects is limited and, due to the age of most local infrastructure, is at a high demand at the local level. The limited amount of funding raised at the local level for capital improvements is focused on local needs and priorities and is not available to invest in projects that would produce regional stormwater benefits. Often these local capital investments address problems within a specific municipality by transferring the problem downstream to neighboring municipalities. Without a regional resource or authority such as a Stormwater Utility District, there is no established mechanism (other than the WNYSC, which is limited) to pool local resources and coordinate the implementation of regional efforts to address flooding and overall water quality issues.

It is recommended that the MS4 communities in Erie and Niagara Counties continue to work together through the WNYSC on stormwater management activities. It is also recommended that the MS4 communities continue to support the WNYSC and grant funding opportunities that fund Coalition staff and initiatives. The Coalition should continue to pursue opportunities to identify and create a committed and more dedicated source of funding for Coalition activities. The Coalition and MS4 communities should continue to look for grants and other ways to fund regional projects that will mitigate and address our priority flooding and water quality problems and concerns.

One idea for funding regional water quality and quantity improvement projects is setting up an alliance similar to the Finger Lakes – Lake Ontario Watershed Protection Alliance (FL-LOWPA). There are currently twenty five counties participating in the FL-LOWPA. The purpose of this alliance, which is governed by a regional Water Resources Board, is to protect and enhance water quality in the Lake Ontario Basin. The alliance promotes a coordinated watershed approach to foster partnerships and collaborative efforts to address priority regional water quality improvement needs. Through the New York State legislature and the Environmental Protection Fund (EPF), FL-LOWPA has received an annual line item budget of $2 million to support the efforts and programs of their member counties. Managed through the Water Resources Board, this dedicated source of funding provides the counties resources to implement projects that foster regional collaboration and address regional needs and priorities.

The creation of a Lake Erie – Niagara River Watershed Protection Alliance (LE-NRWPA) and the establishment of a similar dedicated funding source to assist in the protection of the Lake Erie -Niagara River Basin would provide a mechanism to fund efforts to address regional water quality resources and regional flooding concerns. It would also provide dedicated support for the WNY Stormwater Coalition, which needs to further pursue this approach with the NYSDEC and the State Legislature. Annual funding dedicated as a line item through the EPF would provide the support to address our compelling needs and foster the collaboration necessary to resolve our regional stormwater problems and protect our Great Lakes water resources.

A second round of federal funding through the Environmental Protection Agency's Great Lakes Restoration Initiative will be released soon. It is recommended that the WNY Stormwater Coalition and the Erie County DEP discuss partnering with the NYSDEC to apply for resources toward initial funding for a LE-NRWPA pilot program.

ECDEP Storm Water Utility District - Phase 1

Information Gathering Form

Information needed: Please complete this form to the best of your ability. Information is due back by February 20, 2009. Thank you for your effort! Please utilize the check boxes to indicate your information is included.

☐ Please attach all pertinent conclusions, recommendations and capital cost estimates from drainage or storm sewer water studies / reports. Check box is included for your convenience.

☐ Please attach all pertinent storm water infrastructure mapping or provide a CD with electronic data. Check box is included for your convenience.

Infrastructure Inventory (for entire municipality)

A. Stormwater conveyance systems

Database / listing of system assets

Pipe Length by Size category

12" to 24"	> 24" to 36"	> 36" to 48"	> 48"

Total Length of Pipe	Number of Retention / Detention Ponds, including underground systems

Number of Catch Basins and Manholes	Number of other Stormwater Treatment Facilities

B. Stormwater Management Practices

☐ Please attach all pertanent maintenance records (MSA permit manager program output will be accepted.)

Is your municipality using the computer stormwater management program provided by the Western New York Stormwater Coalition?

Do you use another CMMS (Computer Maintenance Management System)?

Please list the Staff, equipment and other resources used to manage and maintain stormwater (in accordance with MS4 permit).

Budget for Capital Improvement Programs (CIP)

Existing CIP for stormwater system (or reasonable estimate):

Proposed CIP (5-year) stormwater / drainage / flooding:

Historic and Proposed Major Repair, Replacement and Improvements of stormwater infrastructure.

Major capital stormwater improvements in past 5 years:

Additional / anticipated capacity requirements from master plan:

Other Planned development that may result in a need for drainage improvements:

Other known improvement requirements:

Operations and Maintenance

A. Structure (Department)

Please attach all pertanent information for the below items and check it off if attached:

- ☐ Organizational structure
- ☐ Staff (position) responsibilities
- ☐ Contracted Services
- ☐ Shared Services

B. Budget

Allocation to stormwater system:

Percent expenditure within MS4 regulated boundry

Percent expenditure outside MS4 regulated boundry

Additional Comments or Notes:

Financial Information needed:

Summary of Outstanding Bond(s) for Wastewater Collection System Infrastructure:

Issue date (s): _____

Original amount (s) : _____

Scope of Project Covered by Bond Issue and Status:

_____

_____

Terms and Conditions (rate, redemption date and premiums, etc):

_____

_____

Amount Outstanding (Principal and Interest) / Debt Service Payment Schedule: _____

_____

Grant Funding Sources and Amounts:

_____

_____

_____

Bonding Capacity, Limit of Total Indebtedness:

_____

Availability of Wastewater Collection System Assessment Funds

Existing Assessment Funds / Reserve Funds / Capacity Fee Funds:

_____

_____

_____

Uses of Funds:

_____

_____

Current Balance of Applicable Funds: _____

Interest Earnings: _____

Unapplied cash and reserves: _____

Rate structure: _____

Wastewater Collection System billing

Number and Type of customers (residential, commercial, industrial, institutional, other):

Billing categories and basis of billing (i.e. quarterly based on water usage included in annual property tax, flat annual rate, etc.)

Breakdown of Billing Rate (i.e. NCSD#1, ECSD's and BSA as applicable, wastewater collection O&M, administration, depreciation, capital requirements, etc) for each customer type.

Annual revenue requirements:

Historical user rates and charges:

Projection of user rates and charges:

Billing collection rates / percentage:

Wastewater collection system budgets

Operations:

Maintenance (general and preventative):

Utilities (i.e. electric consumption at pump stations, etc.):

Emergency Repairs:

Contract Services:

Capital Budget / Implementation Schedule:

New Construction Inspection:

Billing and Administration:

Organizational Structure:

Number of Staff and Responsibilities (administrative, maintenance, inspection, emergency repair, operations, etc.):

Summary of Outstanding Bond(s) for Stormwater Collection System Infrastructure:

Issue date (s):

Original amount (s) :

Scope of Project Covered by Bond Issue and Status:

Terms and Conditions (rate, redemption date and premiums, etc):

Amount Outstanding (Principal and Interest) / Debt Service Payment Schedule:

Grant Funding Sources and Amounts:

Bonding Capacity, Limit of Total Indebtedness:

Availability of Stormwater Collection System Assessment Funds

Existing Assessment Funds / Reserve Funds / Capacity Fee Funds:

Uses of Funds:

Current Balance of Applicable Funds: _____

Interest Earnings: _____

Unapplied cash and reserves: _____

Rate structure: _____

Stormwater Collection System billing

Number and Type of customers (residential, commercial, industrial, institutional, other):

_____

_____

_____

Billing categories and basis of billing (i.e. quarterly based on water usage included in annual property tax, flat annual rate, etc.)

_____

_____

_____

_____

_____

Breakdown of Billing Rate (i.e. stormwater collection O&M, administration, depreciation, capital requirements, etc) for each customer type.

_____

_____

Annual revenue requirements: _____

Historical user rates and charges: _____

Projection of user rates and charges: _____

Billing collection rates / percentage: _____

Stormwater collection system budgets

Operations: _____

Maintenance (general and preventative): _____

Utilities (i.e. electric consumption at pump stations, etc.): _____

Emergency Repairs: _____

Contract Services: _____

Capital Budget / Implementation Schedule: _____

New Construction Inspection: _____

Billing and Administration: _____

_____

Organizational Structure: _____

Number of Staff and Responsibilities (administrative, maintenance, inspection, emergency repair, operations, etc.):

_____

_____

_____

_____

_____

_____

Municipality	Conclusions, recommendations and capital cost estimates	Storm Water Infrastructure Mapping	Pipe length by LF - 12" to 24"	Pipe length by LF - 12" to 24" (enter size)	Pipe length by LF - 24" to 36"	Pipe length by LF - 24" to 36" (enter size)	Pipe length by LF - 36" to 48"	Pipe length by LF - 36" to 48" (enter size)	Pipe length by LF - 48"	Pipe length by LF - 48" (enter size)	Total length of Pipe (size)	Total Length of Pipe (extra info)	Number of Retention / Detension Ponds including underground syst	Number of Retention / Detension Ponds (enter number)	Other Information	Number of Manholes	Number of Catch Basins	Number of other Stormwater treatment facilities	Maintenance records	Using SMP provided by NYSC?	Do you use another CMMS?	Staff, equipment and other resources	Existing CIP for storm water system (or reasonable estimate)	Proposed CIP (5-Year) for sotmr water / drainage / flooding	Historic and proposed major repair and replacement	Major capital improvements in past 5 years for storm water	Additional / anticipated capacity requirements from master plan	Other Planned development	Other known improvement requirements	Organizational Structure	Staff (position) responsibilities	Contracted services	Shared Services	Allocation to storm water system	% within MS4 regulated boundry	% outside MS4 regulated boundry	Additional Notes or comments
Alden (Village of)	FALSE	FALSE		28074		442		0		0	28516		4 total (1 public 3 private) more under constructio n	4		100	101	2 manholes with baffles	FALSE	in progress just getting into newer version	no	Keith responsible for W, S, ST, Roads and garbage (entire infrastructure). Ditch cleaning (Town does @ Village request). Swap services with Town a lot.	Baxter Avenue outfall $5,000+/-	Full street replacem ent- Kellogg & Elm. Currently a CIP request but no results from Village Board.	Mechanic Street 2006- entire street replacement $730k (+/-) storm portion $85k (+/-). Designed by TVGA	Mechanic Street reconstructi on including stormwater system replacement	None (confirmed) and Village wants to control developmen t	None- confirmed	None- confirmed	TRUE	TRUE	FALSE	TRUE	$18,431	100	0	Shared Services: 1/2 of Sullivan Road is under agreement with Town of Alden as 1/2 of road is in village and 1/2 of road is in Town
Angola (Village of)	FALSE	FALSE		18100		200		0		0	38050		2- 1 public, 1 private (spring 2009 constructio n)	2	ditches 2,000 feet	20	48		FALSE	not yet	no	20% backhoe, 20% dumptruck, 100% street sweeper, 3 full time laborers (20-30%) no other equipment/staff	5,000 per year- annual line item in budget, each year he spends $5K on materials for improve ments to the system.	none at this time- there are things that need attention but no $ to complete (ie: flooded areas, old pipes, blocked ditches)	15 years ago- sunset blvd. 1500 +/- LF full replacement of road and storm	2008 ditch cleaning/pip e extension to support drainage associated with Beachwood Harbor (within $5K annual line-item budget)	need complete study of Village drainage. Village does not have a master drainage study. Village downtown area has received $ to improve the area but no $ put into difficient storm yet.	Holly Harbor (senior housing) to be construct ed by private developer no Village improvem ents required.	possibly need 2-3 retention ponds with new piping to control storms. No $ available & Jeff is trying to get board to fund.	FALSE	FALSE	FALSE	FALSE	$25000	100	0	$5,000 for materials, $25K total for wages, vehicle maintenance & materials
Aurora (Town of)	FALSE	FALSE		7							7	7.1 miles total pipe run with 1.5 +/- miles on 2 sides and 4 +/- miles on 1 side.	4 (all private no Town responsibil ity and no Town knowledge of condition or function)	4	all inform ation is best guess - no mappi ng/dat a availab le - Bill obtain ed info by driving around	150	200	N/A	FALSE	Have program - use for reports & develop ment but not to its full ability. Not for SW Manage ment needs.			none - confirme d	none - confirmed	New storm infrastructure on Underhill Road (1+/- miles) in 2007 construction season- Town funding (General fund) $36K+/-	none - confirmed	none known to be needed at this time	N/A - confirmed	N/A - confirmed	FALSE	FALSE	FALSE	FALSE	$70K	100	0	
Blasdell (Village of)	FALSE	FALSE		211200		0		0		0	0	No Ditches		0		0	0	0	FALSE		yes	DPW - 5 man crew that spend a portion of their time on storm related activities (TYP maintenance related)	none	none	$10,000 per year as part of CDBG grants	roughly $40,000 in replacement of MHs and CBs	none	none	replaceme nt / maintenan ce of MH's and CB's village wide - no working inventory	FALSE	FALSE	FALSE	FALSE		100	0	5 man crew also spends time on roads, parks, village facilities and equipment, gen maintenance, etc. Shared services w/ Hamburg (code enforcement)
Buffalo Sewer Authority	FALSE	FALSE		0		0		0		0	59400	No breakdow n on size provided	none	0	Use 300' spacin g to estima te CB's and MH's	100	100		FALSE					12,900,00 0						FALSE	FALSE	FALSE	FALSE		0	0	Note that the 5-yr CIP invloves separation of CS, that will ultimately (after construction) discharge to a CS outfall.

Municipality	SW - Issue date / Original Amount	SW - Scope of project covered by Bond issue and status	SW - Terms and Conditions	SW - Amount Outstanding	SW - Grant Funding Sources and Amounts	SW - Bonding Capacity	SW - Limit of Total Indebtedness	SW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	SW - Uses of Funds	SW - Current Balance of Applicable Funds	SW - Interest Earnings	SW - Unapplied cash and reserves	SW - Rate structure	SW - Number and type of customers	SW - Billing categories and basis of billing	SW - Breakdown of Billing Rate
Alden (Village of)	2011 to go to bond included in Mechanic Street reconstruction total $505,000	storm sewer portion of Mechanic Street approx. $160,000	3.8% currently in BAN	$486,000.00 yearly principal 19,000 interest 19,190.	none	unknown	unknown	none	n/a	0	0	0	none	none	none	none
Angola (Village of)	none							none								
Aurora (Town of)	N/A $0															
Blasdell (Village of)	none							none								
Buffalo Sewer Authority																
Cambria (Town of)	none							41000					Ad Valorem @ 0.11 / 1000. Hgwy is 1.64 per 1000 plus sales tax portion	2666 parcels		
Cheektowaga (Town of)	1999 - 700k (Harlem Rd.), 2005 - 1.1m (Anderson Rd. & another project) - 15yr bonds	trunkline (60") along Harlem Rd., Andreson Road drainage improvement project	See attached	See attached	N/A			Fund Balance of $250,000	Emergency			$250,000		28791 parcels, 26332 residential + 2459 commercial	Flat annual rate of $15.35 for residential parcels, commercial rate varies	Unit charge
Clarence (Town of)	none							400,000 + additional monies through permit fees and eng budget for SWMP implementation	All O & M, some misc pipe replacements and upgrades					Town wide - based on frontage	Drainage District funded thru county tax bill	
East Aurora (Village of)														N/A		
ECSD #6	see scanned info - to much to list here						500k per yr	see scanned info - to much to list here								

Municipality	SW - Issue date / Original Amount	SW - Scope of project covered by Bond issue and status	SW - Terms and Conditions	SW - Amount Outstanding	SW - Grant Funding Sources and Amounts	SW - Bonding Capacity	SW - Limit of Total Indebtedness	SW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	SW - Uses of Funds	SW - Current Balance of Applicable Funds	SW - Interest Earnings	SW - Unapplied cash and reserves	SW - Rate structure	SW - Number and type of customers	SW - Billing categories and basis of billing	SW - Breakdown of Billing Rate
Eden (Town of)																
Elma (Town of)																
Erie County DPW	None															
Grand Island	none															
Hamburg (Town of)																
Hamburg (Village of)																
Lackawanna (City of)	ECSD #6															
Lancaster	3 bonds - see scanned info, to much to list here.	Central Ave Bridge, Siebert Rd Culvert, Steinfeldt Rd Culvert	See scanned info	See Scanned info I believe this is 951K			4.47% of 158,066,839	none						only fees come from commercial development SWPPP review		
Lancaster (Village of)														N/A confirmed		
Lewiston (Town of)	$0													N/A		
Niagara County	None			0	0			0					none	none		

Municipality	SW - Issue date / Original Amount	SW - Scope of project covered by Bond issue and status	SW - Terms and Conditions	SW - Amount Outstanding	SW - Grant Funding Sources and Amounts	SW - Bonding Capacity	SW - Limit of Total Indebtedness	SW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	SW - Uses of Funds	SW - Current Balance of Applicable Funds	SW - Interest Earnings	SW - Unapplied cash and reserves	SW - Rate structure	SW - Number and type of customers	SW - Billing categories and basis of billing	SW - Breakdown of Billing Rate
Niagara Falls Water Board														No separate billing		
North Tonawanda (City of)	1996-2007 Storm $1,558,000.00		see attached schedule	$311,000		debt limit $71,672,732 percent exhausted 19.79%		$150k Briarwood Estates Subdivision for storm	N/A to recoup capital improvement over 10 years							
Orchard Park (Town of)																
Pendleton (Town of)	none							N/A						N/A		
Tonawanda (City of)	none															
Tonawanda (Town of)	see scanned doc - appears all projects are san related				none			none		none	none	none	2008: low runoff 0.000098 / sqft, high runoff 0.001968 / sqft	see ww	rev for drainage district are collected through tax rate and is broken down per above info	
West Seneca (Town of)										$1,000		$1,000	each industry in the industrial park pays a small fee for drainage, otherwise there are no sw fees in the town	just industries in the industrial park		
Wheatfield (Town of)	2/15/06 and 2/15/07 for 1,260,000 and 500,000 respectively.	construction of surface drainage improvements	$95,856 annually for principal and interest for both bonds	1,677,900		65,318,037										
Williamsville (Village of)																
Youngstown - (Village of)																

Municipality	SW - Annual revenue requirements	SW - Annual revenue requirements (enter number)	SW - Historical user rates and charges	SW - Historical user rates and charges (enter number)	SW - Projection of user rates and charges	SW - Projection of user rates and charges (enter number)	SW - Billing collection rates / percentage	SW - Billing collection rates / percentage (enter number)	SW - Operations	SW - Operations (enter number)	SW - Maintenance (general and preventative)	SW - Maintenance (general and preventative) (enter number)	SW - Utilities	SW - Utilities (enter number)	SW - Emergency Repairs	SW - Emergency Repairs (enter number)
Alden (Village of)	n/a		n/a		n/a		n/a			7281		8650		0	included in maintenance $	
Angola (Village of)		0		0		0		0		0		0		0		0
Aurora (Town of)		0		0		0		0	see attached	0		0		0		0
Blasdell (Village of)		0		0		0		0		0		0		0		0
Buffalo Sewer Authority		0		0		0		0		0		0		0		0
Cambria (Town of)		41000		0		0		0		38000		3000		0		0
Cheektowaga (Town of)	2009 Budget	650375	At inception in 1993, $5 per home	5	modest annual increases are expected	0		100	Personnel Allocations	143575		270000		0	Funded from maintenance line budget	0
Clarence (Town of)		0		0		0		0		0		0		0		0
East Aurora (Village of)		0	$200 tap fee for connection plus time and material.	0		0		0		0		19450		0		0
ECSD #6		0		0		0		0		0		0		0		0

Municipality	SW - Annual revenue requirements	SW - Annual revenue requirements (enter number)	SW - Historical user rates and charges	SW - Historical user rates and charges (enter number)	SW - Projection of user rates and charges	SW - Projection of user rates and charges (enter number)	SW - Billing collection rates / percentage	SW - Billing collection rates / percentage (enter number)	SW - Operations	SW - Operations (enter number)	SW - Maintenance (general and preventative)	SW - Maintenance (general and preventative) (enter number)	SW - Utilities	SW - Utilities (enter number)	SW - Emergency Repairs	SW - Emergency Repairs (enter number)
Eden (Town of)		0		0		0		0	See 'general' form stormwater operations finacial info - not accurate It was good seing you today. Here is a copy of your report I'm sure you'll have questions so just give me a yell Gary 432-7423	0		0		0		0
Elma (Town of)		0		0		0		0		0		0		0		0
Erie County DPW		0		0		0		0		0		0		0		0
Grand Island		0		0		0		0	10K budget for maint and repair (wages and equipment use)	10000	Average of 30 days of 3 lab and vac truck	0		0	for flooding - OT - 2 workers at 8 days.	0
Hamburg (Town of)		0		0		0		0		0		0		0		0
Hamburg (Village of)		0		0		0		0		0	entire storm budget goes to maintenance - Harley to provide	0		0	no emergency budget	0
Lackawanna (City of)		0		0		0		0		0		0		0		0
Lancaster		0		0		0		0		0		0		0		0
Lancaster (Village of)		0		0		0		0	see attached	0		0		0		0
Lewiston (Town of)		0		0		0		0	N/A	0		0	for muckland pump station	25000		0
Niagara County		0		0		0		0		0		0		0		0

Municipality	SW - Annual revenue requirements	SW - Annual revenue requirements (enter number)	SW - Historical user rates and charges	SW - Historical user rates and charges (enter number)	SW - Projection of user rates and charges	SW - Projection of user rates and charges (enter number)	SW - Billing collection rates / percentage	SW - Billing collection rates / percentage (enter number)	SW - Operations	SW - Operations (enter number)	SW - Maintenance (general and preventative)	SW - Maintenance (general and preventative) (enter number)	SW - Utilities	SW - Utilities (enter number)	SW - Emergency Repairs	SW - Emergency Repairs (enter number)
Niagara Falls Water Board		0		0		0		0		0		0		0		0
North Tonawanda (City of)		0		0		0		0		0		0		0		0
Orchard Park (Town of)		0		0		0		0		0		0		0		0
Pendleton (Town of)		0		0		0		0		0	ditch cleaning, culvrt installs, streetsweeping	60000	N/A	0		0
Tonawanda (City of)		0		0		0		0		0		0		0		0
Tonawanda (Town of)	526,601	526601		0	same as 2008: low runoff 0.000098 / sqft, high runoff 0.001968 / sqft	0		0		139354		127500		0		21300
West Seneca (Town of)	estimated from engineering, highway and drainage budgets	200000		0		0		0		0		0		0		0
Wheatfield (Town of)	144048 total storm budget	144048		0		0		0	Salaries of 2 people - Jim C and equip operator	79048		0		0		0
Williamsville (Village of)		0		0		0		0		138004		0		0		0
Youngstown - (Village of)		0		0		0		0	WNYSWC -	19000		0		0		0

Municipality	SW - Contract Services	SW - Contract Services (enter number)	SW - Captial Budget	SW - Captial Budget (enter number)	SW - Implementation Schedule	SW - Implementation Schedule (enter number)	SW - New Construction Inspection	SW - New Construction Inspection (enter number)	SW - Billing and Administration	SW - Billing and Administration (enter number)	SW - Organizational Structure	SW - Number of Staff
Alden (Village of)		2500	$5000 budgeted for Baxter Street outfall						approx. $3000		attached	
Angola (Village of)		0		0		0		0		0		
Aurora (Town of)	CRA and coalition	10000		0		0		0		0		
Blasdell (Village of)	Roughly $10,000 per year spent on MPI retainer for work associated with stormwater	10000	none	0	none	0	no budget	0	no budget	0	DPW budget covers this area, however, no specific workforce dedicated to Stormwater	5 DPW personnel - no specific responsibility - hard to track time spent on storm
Buffalo Sewer Authority		0		0		0		0		0		
Cambria (Town of)		0		0		0		0		0		
Cheektowaga (Town of)	Pest control, consulting services, private contractors	291000		0		0		0	personnel from other departments	143575	Supervision and oversight of townwide drainage district by engineering department	Work performed and funded under the drainage district is for the most part contracted. Supervision of contracted activities is performed by one principal engineer asst.
Clarence (Town of)		0		0		0		0		0		Hgwy - O & M and repair, Eng Dpt - Admin
East Aurora (Village of)	CRA fee and coalition dues	7500		0		0		0		0		
ECSD #6		0		0		0		0		0		

Municipality	SW - Contract Services	SW - Contract Services (enter number)	SW - Captial Budget	SW - Captial Budget (enter number)	SW - Implementation Schedule	SW - Implementation Schedule (enter number)	SW - New Construction Inspection	SW - New Construction Inspection (enter number)	SW - Billing and Administration	SW - Billing and Administration (enter number)	SW - Organizational Structure	SW - Number of Staff
Eden (Town of)		0		0		0		0		0		
Elma (Town of)		0		0		0		0		0		
Erie County DPW		0		0		0		0		0		
Grand Island		0		0		0	Covered under PIP fee	0		0		
Hamburg (Town of)		0		0		0		0		0		
Hamburg (Village of)	no contracted services	0		0		0	$25.00 ROW permit	0		0		
Lackawanna (City of)		0		0		0		0		0		
Lancaster		0		0		0		0		0		
Lancaster (Village of)		0		0		0		0		0		
Lewiston (Town of)		0		0		0		0		0	2 employees in the drainage dept would do emergency repair and maintenance projects. We are still in the process of setting up the structure of stormwater complaince personnel	
Niagara County		0		0		0		0		0		

Municipality	SW - Contract Services	SW - Contract Services (enter number)	SW - Captial Budget	SW - Captial Budget (enter number)	SW - Implementation Schedule	SW - Implementation Schedule (enter number)	SW - New Construction Inspection	SW - New Construction Inspection (enter number)	SW - Billing and Administration	SW - Billing and Administration (enter number)	SW - Organizational Structure	SW - Number of Staff
Niagara Falls Water Board		0		0		0		0		0		
North Tonawanda (City of)		0		0		0		0		0		
Orchard Park (Town of)		0		0		0		0		0		
Pendleton (Town of)	structure repairs	10000		0		0	PIP Program? CRA?	0		0		
Tonawanda (City of)		0		0		0		0		0		
Tonawanda (Town of)		4000		0		0	bldg dpt	0	71,047	0		see scanned doc
West Seneca (Town of)		0		0		0		0		0		
Wheatfield (Town of)		40000		0		0		0		0		SMO, Hgwy Dpt employees, Town Eng.
Williamsville (Village of)		0		0		0		0		0		
Youngstown - (Village of)	EDR (Village Engineer)	10000		0		0		0		0	Same 4 DPW staff	

Municipality	WW - Issue date / Original Amount	WW - Scope of project covered by Bond issue and status	WW - Terms and Conditions	WW - Amount Outstanding	WW - Grant Funding Sources and Amounts	WW - Bonding Capacity	WW - Limit of Total Indebtedness	WW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	WW - Uses of Funds	WW - Current Balance of Applicable Funds	WW - Interest Earnings	WW - Unapplied cash and reserves	WW - Rate structure	WW - Number and type of customers	WW - Billing categories and basis of billing	WW - Breakdown of Billing Rate
Alden (Village of)	none													none		
Angola (Village of)	See ECSD for this info															
Aurora (Town of)	almost entire Town is septic or within a district. Individual developments have private systems within 5 districts there is a county sewer that feeds the industrial area- no tie ins allowed													Taxes per district as necessary between 60 - 100 residences/district +/- $500-600 per household	Water- Townwide district w/ ECWA water. Residence gets quarterly water bill	
Blasdell (Village of)	owned by Erie County							owned by Erie County							owned by Erie County	
Buffalo Sewer Authority	See Scanned Docs.	See Scanned Docs.	See Scanned Docs.	See Scanned Docs.	See Scanned Docs.		125,000,000							74,497 residential and 2300 commercial	Per QTR based on water usage, Annual based on assesed property	1.80 per 1000 assessed value, $11.09 per 1000 CF+6.00 (res) and 55.00 (Com) per month connection fee
Cambria (Town of)	none							381,160 is 2009 budget total, of this 254,839.50 goes to NCSD #1	O&M Admin, CIP					176 residential, 2 apt complexes 3 institutional	0.40 per 1000 on all props w/in SD. 0.60 per 1000 on sewered frontage props.	Water is 135 per EDU Sewer is 135 both billed annually.
Cheektowaga (Town of)	1989 - 300k, 1995 - 170k, 1997 - 290k, 2001 - 700k, 2004 - 750k	various sewer rehab projects, cip lining projects, pump sta elimination project	15 to 30 yr bonds - see amortization schedule	2.4million, see attached schedule	No grants for recent work,. Efc bond & revolving fund financing	Debt Limit for Town = $232,800,000, 7% of full value assessment of 3.5billion		Consultant engineer budget line of $100,000. Fund balance of 5million	Emergency repairs, offset future budget increases		$185,000	$5 million		Town Consolidated sanitary district - 19,032 residential, 1224 commercial; Erie County SD No. 1 - 7265 res., 439 comm.	Annual property tax, $258 user rate for single family, $1.406486 maintenance fee per thou/assess val, $0.376043 debt service per thou/assess val. Avg home = 383.00/yr	

Municipality	WW - Issue date / Original Amount	WW - Scope of project covered by Bond issue and status	WW - Terms and Conditions	WW - Amount Outstanding	WW - Grant Funding Sources and Amounts	WW - Bonding Capacity	WW - Limit of Total Indebtedness	WW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	WW - Uses of Funds	WW - Current Balance of Applicable Funds	WW - Interest Earnings	WW - Unapplied cash and reserves	WW - Rate structure	WW - Number and type of customers	WW - Billing categories and basis of billing	WW - Breakdown of Billing Rate
Clarence (Town of)	1989 (20-yr bonds) $1,300,000 total (almost paid off)														Rate per assessed value for debt serive. EDU charge for OM & Treatment. Treatment cont. w / Amherst, Clarence has 4 dist. ECSD #5 collects all taxes, EC provides all O&M	
East Aurora (Village of)	has never done storm bonding							EC Sewer District								
ECSD #6	Reference ECSD for all WW info															
Eden (Town of)	Not appicable															
Elma (Town of)	Lewiston Master Sewer District CLMSIA- 2 bonds end 2014 and 2021. Lewiston South Sewer District - 6 bonds all end 2021	All for sewer construction except for 1 bond covering water meter purchase and installation	LMSIA end 5/1/14 & 2021. South end 2021	LMSD- $1.078 million total debt service/ South 1.782 total debt	none@ this time	Unknown	Unknown	LMSD fund balance 1.2 million dollars, South fund balance 0.1 million dollars	to be used for system upgrades and equipment replacement				LMSD 0.08/1000AV + 0.49/1000 gal water consumption. South2.23/1000AV + 0.49/1000 gal water consumption	LMSD-6 institutional, 0 industrial/commercial, 3400 residential. South-3 institutional, 3 commercial, 600 residential	billed every 2 months based on water consumption	
Erie County DPW																
Grand Island	SEE ECSD #3															
Hamburg (Town of)																
Hamburg (Village of)																
Lackawanna (City of)	See ECSD #4 for WW info															
Lancaster																
Lancaster (Village of)																

Municipality	WW - Issue date / Original Amount	WW - Scope of project covered by Bond issue and status	WW - Terms and Conditions	WW - Amount Outstanding	WW - Grant Funding Sources and Amounts	WW - Bonding Capacity	WW - Limit of Total Indebtedness	WW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	WW - Uses of Funds	WW - Current Balance of Applicable Funds	WW - Interest Earnings	WW - Unapplied cash and reserves	WW - Rate structure	WW - Number and type of customers	WW - Billing categories and basis of billing	WW - Breakdown of Billing Rate
Lewiston (Town of)	1999 refunded $695,000	Sewer Grinder Pump Station Improvement	4.50% September 1, 2018	$305,000. Payments bi - yearly $35,000	N/A									(+/-) 1/2 town on septic. 2345 Total water bills. 1260 Residential sewer bills, 74 Commercial sewer bills.	Quarterly, based on water usage	0-6000 gal=$11.00, 6000-12,000 gal=$16.00, 12,000-22,000 gal=$1.50 per 1,000 gallons, 22,000-32,000 gal=$1.35 per 1,000 gallons, 32,000-42,000 gal=$1.20 per 1,000 gallons, 42,000 to 4 million gal=$1.10 per 1,000 gallons
Niagara County													3.72 per 100 cf	23 Significant Ind. Users. 19000 Res, Com, and Small users	SIU's: Flow, TSS, SOC, 10 Chemicals // CSIRU's: Flow (with quarterly min)	3.72 per 100 cf
Niagara Falls Water Board	1985 - 600K, 1994 - 880K, 2000B - 2,015K, 2002A - 2,165K - see scanned docs - original amounts 1985 - 4,400K, 1994 - 2,100K, 200B - 3,014.447K, 2002A 3,150.207K	Final completion of Townwide sanitary sewer installation	1985 - 5% fixed rate, 1994 - 6.4% fixed rate, 2000B - 5.3511% rate, 2002A - 3.032% rate	7,424,099 total amount, 705,000 (principle) and 175,000 (interest) for total annual payment of 880,000		65,318,037		2009 Budget is 2,243,385 to be collected through ad volorum and user fee (1,545,979 ad val plus 697,406 user)								
North Tonawanda (City of)	2006-2008 sanitary $1,040,000	Clair Avenue, Old Falls Blvd.	Various- see attached indebtedness schedule	$728,000	none		$71,672,732 percent exhausted 19.79%	none	n/a	n/a	n/a	n/a	n/a	11,638 accounts including residential, commercial, industrial, etc.	all customers billed quarterly based on water consumption usage at $4.50/1000 gallons of consumption plus $12.00 base charge. Part of sewer fund	100% of billing rate finances sewer fund activities, see attached budget.
Orchard Park (Town of)	0							EC Sewer District						0	0	
Pendleton (Town of)	see scanned doc.	see scanned doc.	see scanned doc.	see scanned doc.		5.23% townwide		none		none	none		50% on water consumption, 50% on assessed value and tax rate on front and sq footage	695 apts, 6 churches, 944 commercial, 1 hospital, 123 industrial, 21830 res, 26 schools, 52 town, kenmore, and city of tonawanda	0.113911/1000 assessed value, 1.952077 per road frontage, 0.000533 per sqft, 0.564261/1000 gals	na

Municipality	WW - Issue date / Original Amount	WW - Scope of project covered by Bond issue and status	WW - Terms and Conditions	WW - Amount Outstanding	WW - Grant Funding Sources and Amounts	WW - Bonding Capacity	WW - Limit of Total Indebtedness	WW - Ext Assessment Funds / Reserve Funds / Capacity Fee Funds	WW - Uses of Funds	WW - Current Balance of Applicable Funds	WW - Interest Earnings	WW - Unapplied cash and reserves	WW - Rate structure	WW - Number and type of customers	WW - Billing categories and basis of billing	WW - Breakdown of Billing Rate
Tonawanda (City of)	5 bonds associated with WW - see File	see file	see file	See file	see file	see file	see file	see file	see file	see file	see file	see file	3.53 per 1000 gals for 2009 (min charge of 28K gals)			
Tonawanda (Town of)	no permanent bond yet - 2011 $205,000.00	sanitary portion of Mechanic Street is bonded	3.8% currently under BAN	$197,090.00 yearly principle 70,910 interest 7,790	none	unknown	unknown	$28K	equipment and emergency repairs	28,000	unknown	Keith to provide	included in sewer fees	1,150 total customers (2 industrial, 2 institutional, 50 commercial and remainder residential)	quarterly based on water usage. $5.05 per 1,000 gallons + $10 per quarter for O&M	all customers pay 5.05 per 1000 gallons and $10 fee per quarter. Out of district users pay 2 times rate.
West Seneca (Town of)								Reserve of $553,045	Applied 491,500 to 2008 budget, actual use est is 279,800	$273,545		$273,545 in reserve	2.43 / 1000 assesed value (1.80 for sewer and 0.63 for County sewer CAP) Plus 167.20 for county sewer	average 483.10 for average res home. (5937 residential and 300 commercial / indust.)	Qrtly on water usage and Annual prop tax	0.65 per 1000 gals for 1st 25K gals, 0.55 per 1000 over next 25K gals, 0.45 per 1000 over next 50K gals and 0.15 per 1000 gals over 100K gals
Wheatfield (Town of)																
Williamsville (Village of)	none							annual assessment funds- $196,000, capital reserve funds- $1400.00					$4.50 per 1,000 gallons water consumption	776 customers all same classification	quarterly based upon water usage FYI general Village tax- $567,000 annual 6.2536/1000 assessed valuation	LWPCC treatment and disposal is 87% of the annual Village sewer "rent"
Youngstown - (Village of)	ECSD															

Municipality	WW - Annual revenue requirements	WW - Annual revenue requirements (enter number)	WW - Historical user rates and charges	WW - Historical user rates and charges (enter number)	WW - Projection of user rates and charges	WW - Projection of user rates and charges (enter number)	WW - Billing collection rates / percentage	WW - Billing collection rates / percentage (enter number)	WW - Operations	WW - Operations (enter number)	WW - Maintenance (general and preventative)	WW - Maintenance (general and preventative) (enter number)	WW - Utilities	WW - Utilities (enter number)	WW - Emergency Repairs	WW - Emergency Repairs (enter number)
Alden (Village of)		0		0		0		0	Erie County Sewer District II	0		0		0		0
Angola (Village of)		0		0		0		0		0		0		0		0
Aurora (Town of)		0		0		0		0		0		0		0		0
Blasdell (Village of)		0		0		0		0	owned by Erie County	0		0		0		0
Buffalo Sewer Authority		0		0		0		98	54,513,475	545134750		2853880		10720760		824571
Cambria (Town of)		0		0		0		0		70160		140862		0		0
Cheektowaga (Town of)		0	Annual avg. rate increase = 3%	0	3-5% per year increase	0		100		6000000		0		340000		550000

Municipality	WW - Annual revenue requirements	WW - Annual revenue requirements (enter number)	WW - Historical user rates and charges	WW - Historical user rates and charges (enter number)	WW - Projection of user rates and charges	WW - Projection of user rates and charges (enter number)	WW - Billing collection rates / percentage	WW - Billing collection rates / percentage (enter number)	WW - Operations	WW - Operations (enter number)	WW - Maintenance (general and preventative)	WW - Maintenance (general and preventative) (enter number)	WW - Utilities	WW - Utilities (enter number)	WW - Emergency Repairs	WW - Emergency Repairs (enter number)
Clarence (Town of)		0		0		0		0		0		0		0		0
East Aurora (Village of)		0		0		0		0		0		0		0		0
ECSD #6		0		0		0		0		0		0		0		0
Eden (Town of)		0		0		0		0		0		0		0		0
Elma (Town of)	LMSD 1.6 million, South 307,000	0	LMSD 0.49/1000 gal 0.08/1000AV, South 0.49/1000 gal 2.23/1000AV	0		0	LMSD 20% / 80% South 40% / 60%	0		60000		65000		65000		10000
Erie County DPW		0		0		0		0		0		0		0		0
Grand Island		0		0		0		0		0		0		0		0
Hamburg (Town of)		0		0		0		0		0		0		0		0
Hamburg (Village of)		0		0		0		0		0		0		0		0
Lackawanna (City of)		0		0		0		0		0		0		0		0
Lancaster		0		0		0		0		0		0		0		0
Lancaster (Village of)		0		0		0		0		0		0		0		0

Municipality	WW - Annual revenue requirements	WW - Annual revenue requirements (enter number)	WW - Historical user rates and charges	WW - Historical user rates and charges (enter number)	WW - Projection of user rates and charges	WW - Projection of user rates and charges (enter number)	WW - Billing collection rates / percentage	WW - Billing collection rates / percentage (enter number)	WW - Operations	WW - Operations (enter number)	WW - Maintenance (general and preventative)	WW - Maintenance (general and preventative) (enter number)	WW - Utilities	WW - Utilities (enter number)	WW - Emergency Repairs	WW - Emergency Repairs (enter number)
Lewiston (Town of)		300463	sewer rates 0-12,000 $25.00 added to water bill, residential 13,000 - 58,000 $2.00 per 1,000, commercial 13, 000+ $2.00 per 1,000	0		0		0		0	$324,071.00 total budget	324071	$3,000.00 per year for 3 pump stations	3000	$80,000 per year total sewer budget for year for parts manppower part of total budget	80000
Niagara County		0		0		0		0		0		0		0		0
Niagara Falls Water Board		0		0		0		0		0		0		0		0
North Tonawanda (City of)		4888354	see attached schedule C	0	100%	0	100%	0	See attached budget $514,519	514519		0		0		0
Orchard Park (Town of)		0		0		0		0		0		0		0		0
Pendleton (Town of)	6,616,637	6616637	na	0	na	0	na	0		648263		619682		458957		285000

Municipality	WW - Annual revenue requirements	WW - Annual revenue requirements (enter number)	WW - Historical user rates and charges	WW - Historical user rates and charges (enter number)	WW - Projection of user rates and charges	WW - Projection of user rates and charges (enter number)	WW - Billing collection rates / percentage	WW - Billing collection rates / percentage (enter number)	WW - Operations	WW - Operations (enter number)	WW - Maintenance (general and preventative)	WW - Maintenance (general and preventative) (enter number)	WW - Utilities	WW - Utilities (enter number)	WW - Emergency Repairs	WW - Emergency Repairs (enter number)
Tonawanda (City of)	2009 budget is 1,482,000	1482000	See file	0	5% increase per year	0			includes sewage treatment, Town of Tonawanda - see file for more detailed info	960000		272216		0		0
Tonawanda (Town of)	476,321 total	476321	was 4.85/1000 was raised to 5.05/1000 in 2008		none projected		n/a			7858		22200		3800		3000
West Seneca (Town of)	From usage billing only	300000	Percentage of water rate	45	no change projected		90-95 average given - use 93	93		0	includes wages	714100	Inc. in maintenance	0	Inc. in maintenance	0
Wheatfield (Town of)																
Williamsville (Village of)		0		0		0		0		10000		10000		6000		0
Youngstown - (Village of)		0		0		0		0		0		0		0		0

Municipality	WW - Contract Services	WW - Contract Services (enter number)	WW - Captial Budget	WW - Captial Budget (enter number)	WW - Implementation Schedule	WW - Implementation Schedule (enter number)	WW - New Construction Inspection	New Construction Inspection (enter number)	WW - Billing and Administration	WW - Billing and Administration (enter number)	WW - Organizational Structure	WW - Number of Staff
Alden (Village of)		0		0		0		0		0		
Angola (Village of)		0		0		0		0		0	5 DPW personnel - no specific responsibilities other than supervision provided by working crew chief	Hard to track man hours specific to WW
Aurora (Town of)		0		0		0		0		0		
Blasdell (Village of)		0		0		0		0		0		
Buffalo Sewer Authority		5540555	See Scanned Docs	0		0		496820		424680		WW Treatment - 143, Industrial Waste - 8, Eng Dpt - 11, Sewer Maint. Dpt - 40
Cambria (Town of)		0		170138		0		0		0		1 staff in water, 1 in sewer, work together when needed
Cheektowaga (Town of)	BSA Treatment	3500000		0		0		0		1500000	Sewer Maintenance Dept., MPS	Sewer Maint. Dept. - 3 supervisors, 15 sewer maintenance workers, 1 clerical. Main PS (10 mgd to BSA) - 2 supervisory, 11 pump ops, 1 part time clerical

Municipality	WW - Contract Services	WW - Contract Services (enter number)	WW - Captial Budget	WW - Captial Budget (enter number)	WW - Implementation Schedule	WW - Implementation Schedule (enter number)	WW - New Construction Inspection	New Construction Inspection (enter number)	WW - Billing and Administration	WW - Billing and Administration (enter number)	WW - Organizational Structure	WW - Number of Staff
Clarence (Town of)		0		0		0		0		0		
East Aurora (Village of)		0		0		0		0		0		
ECSD #6		0		0		0		0		0		
Eden (Town of)		0		0		0		0		0		
Elma (Town of)		0		0		0		15000		6000	3 full time, 4 part time. Personnel handle routine day to day functions of both sewer districts. They are also responsible for inspections, repairs and after hours calls	
Erie County DPW		0		0		0		0		0		
Grand Island		0		0		0		0		0		
Hamburg (Town of)		0		0		0		0		0		
Hamburg (Village of)		0		0		0		0		0		
Lackawanna (City of)		0		0		0		0		0		
Lancaster		0		0		0		0		0		
Lancaster (Village of)		0		0		0		0		0		

Municipality	WW - Contract Services	WW - Contract Services (enter number)	WW - Captial Budget	WW - Captial Budget (enter number)	WW - Implementation Schedule	WW - Implementation Schedule (enter number)	WW - New Construction Inspection	New Construction Inspection (enter number)	WW - Billing and Administration	WW - Billing and Administration (enter number)	WW - Organizational Structure	WW - Number of Staff
Lewiston (Town of)	Keoster Associates $1,000 per year	1000		0		0	$400.00 gravity $925.00 pressure sewer	400		0	5 full time water/sewer dept employees. Maintain sewer and water syaytems, gravity and pressure sewer + 60 miles of water main. 65% of 5 fullt ime employees is sewer/water maintenance	
Niagara County		0		0		0		0		0		1 Super, 3 Crew Leaders, 1 operating Eng, 2 MEO's, 5 Laborers
Niagara Falls Water Board		0		0		0		0		0		
North Tonawanda (City of)		0		0		0		0		0	Administrative paid out of Public Works Budget. Sanitary Sewer - see attached. 2 lift station operators, 3 wastewater maintenance workers, 4 wastewater maintenance helpers.	
Orchard Park (Town of)		0		0		0		0		0		
Pendleton (Town of)		14250		0		0	bldg dpt	0		1090570	see scanned docs	same as listed on general (18 total)

Municipality	WW - Contract Services	WW - Contract Services (enter number)	WW - Captial Budget	WW - Captial Budget (enter number)	WW - Implementation Schedule	WW - Implementation Schedule (enter number)	WW - New Construction Inspection	New Construction Inspection (enter number)	WW - Billing and Administration	WW - Billing and Administration (enter number)	WW - Organizational Structure	WW - Number of Staff
Tonawanda (City of)		0		0		0		0		0		
Tonawanda (Town of)		1500		0		0		0		53315	normal operations- Superintendant & DPW Clerk, administrator senior water/ww operator, water/ww operator, MEO w/ww, responsible for operation, maintenance, and inspections. Emergency repairs performed by water/sewer crew as well as remaining DPW staff	
West Seneca (Town of)	Inc. in maintenance	0	personnel benefits	121800		0		0	auditing, engineering, etc.	203000	1 water / sewer forman, 2 clerk secretaries, 4 maint. Employees	7 - see above
Wheatfield (Town of)												
Williamsville (Village of)		0		0		0		0		0	same 4 DPW staff	
Youngstown - (Village of)		0		0		0		0		0		

Municipality	Conclusions, recommendations and capital cost estimates	Storm Water Infrastructure Mapping	Pipe length by LF - 12" to 24"	Pipe length by LF - 12" to 24" (enter size)	Pipe length by LF - 24" to 36"	Pipe length by LF - 24" to 36" (enter size)	Pipe length by LF - 36" to 48"	Pipe length by LF - 36" to 48" (enter size)	Pipe length by LF - 48"	Pipe length by LF - 48" (enter size)	Total length of Pipe (size)	Total Length of Pipe (extra info)	Number of Retention / Detension Ponds including underground syst	Number of Retention / Detension Ponds (enter number)	Other Information	Number of Manholes	Number of Catch Basins	Number of other Stormwater treatment facilities	Maintenance records	Using SMP provided by NYSC?	Do you use another CMMS?	Staff, equipment and other resources	Existing CIP for storm water system (or reasonable estimate)	Proposed CIP (5-Year) for sotmr water / drainage / flooding	Historic and proposed major repair and replacement	Major capital improvements in past 5 years for storm water	Additional / anticipated capacity requirements from master plan	Other Planned development	Other known improvement requirements	Organizational Structure	Staff (position) responsibilities	Contracted services	Shared Services	Allocation to storm water system	% within MS4 regulated boundry	% outside MS4 regulated boundry	Additional Notes or comments
Cambria (Town of)	FALSE	FALSE		11134		0		0		0	0	9156 LF open ditches		1	Pipe and ditch quantities appear to be very accurate (based on actual measurements)	19	18	0	FALSE	no	no	1 person (of 6) on average works on drainage issues				none	none	none known at this time	none	FALSE	FALSE	FALSE	FALSE	144807	10	90	approx 10% of Highway Budget (.10 X 1038070)= 103807+41000 collected in drainage distric fees. 8850 of the 41000 is allocated to SM in MS4. Very little goes to CIP
Cheektowaga (Town of)	TRUE	TRUE		485438		73945		29004		28333		616720		7	Storm water Pump Station	1536	4153		FALSE	Not yet being utilized	No									FALSE	FALSE	FALSE	FALSE			100	stuff
Clarence (Town of)	FALSE	FALSE		300000		70000		25000		5000	400000		Town does not own or maintain ponds, however a number was provided (37 wet and 18 dry ponds)	55		1250	1250	5 CDS units	FALSE	Yes	no	Eng Dpt - 3 emp, Hgwy - 3emp, Street Sweeper and Vac Truck	none	Miles Road Bridge - $600,000	Miles Road Bridge - $600,000	Ditching / Maintenance	na	na	$300,000 to mitigate Poplar Court Flooding	FALSE	FALSE	FALSE	FALSE	400,000	100	0	Town Wide Drainage District - $400,000 annual revenue
East Aurora (Village of)	FALSE	TRUE										50 miles of pipe		0		600	600		FALSE	Same as Town- Matt Hoeh (Village DPW Super) gets info and keeps records, Bill (Engineer) is SW manager and keeper of info	No	Bill to Provide - Same as Town	Confirmed none	Confirmed N/A	NYS DOT Main Street reconstruction 08/10 storm replacement part DOT project	Griggs Place reconstruction on 05/06, Warren Drive 03/04 Bonded - Bill to get more info from Matt	N/A	East Filmore Avenue reconstruction 09/10. 1,574 feet reconstruction of road, bridge and incidental storm (box culvert). Village looking for grants or federal funding		FALSE	TRUE	FALSE	FALSE	$26,950	100	0	
ECSD #6	FALSE	FALSE		0		0		0		0	264000	no info on pipe size	0	0	3 pump stations, no open ditches	1528	1528	0	FALSE	yes	no	no info specific to storm provided	none	none	see scanned table	see scanned table	na	na	na	FALSE	FALSE	FALSE	FALSE		100	0	

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Eden (Town of)	FALSE	FALSE		0		0		0		0	526205	306573 feet of open ditch. Info not broken down into size catergory		4	Number of catch basins and manhole not provided - estimate closed system has junction every 300 feet = 1754	877	877	0	FALSE	yes	no	PT Stormwater management officer with help from the WNYSC	est annual cost of maintenance and upgrades = $300,000	none in place	Associated with roadway maintenance / repair / upgrades	ongoing - based on roadway paving schedule	none planned		oil-water separators for Municipal bldgs, ($150,000) and upgrade select rdwy culverts ($500,000)	FALSE	FALSE	FALSE	FALSE	312000 - see notes	40	60	The allocation to storm includes 2K for SMO, 10K for storm "contractual" Employee salary of 140K and an additional 160K for "contractual" this needs to be refined to better rep efforts spec. to storm.
Elma (Town of)	FALSE	FALSE		200000		0		0		0	200000	Jim estimates: 41 miles of road with 1/2 piped on both sides, 10 miles in subdivisions and 30 miles along country roads		0	no catchbasins on country roads, subdivision roads have cb @ every 150 LF (+/-)	0	300		FALSE	Has program but not in use currently and not planned to be used. Since implemented - no new construction or inspection	No	No equipment or maintenance used. Very minimal requirements. No streetsweeping, sump cleaning, leaf pick up, etc.	Individual subdivisions have utility districts that pay for any repairs. Town coordinates repair & district pays. 175 individual stormwater districts within Town only 2 districts are active.	N/A	See Existing CIP info.	N/A	N/A	any new development would require developer to do improvements. Nothing proposed or known		FALSE	FALSE	FALSE	FALSE	None	33	67	most of infrastructure improvements were paid for by frontage owners & installed by Town over last 50 years. There is no town tax.
Erie County DPW	FALSE	FALSE		0		0		0		0	8025600	rough estimate from length of county road in MS4 area		0	estimate of manholes from length of roaway with storm sewer (300' per manhole)	27000	0	1 pump station at Kenmore Ave.	FALSE	Have it, but haven't started using it yet	No	No dedicated staff, but 130 people assigned to maintenance	Cayuga Drive, total project cost $15.6 million (detailed breakout in project folder); $300,000 other replacements	Como Drive, total project estimate of $3 million, detailed break out in project folder						FALSE	FALSE	FALSE	FALSE	0	0	no allocations to stormwater yet, need a dedicated source of funding for their compliance efforts. Limited stable of equipment in house, often need others to help (contractors or ECSD)

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Grand Island	FALSE	FALSE		0		0		0		0	211200	Rough Estimate - 70% of Road is piped. No size info given		20		600	600	0	FALSE		Excel Spreadsheet to track CB maintenance	gradeall, street sweeper, vac-truck, dumptruck	none	none	none	none	none	n/a - handled by developer of property (hopefully)	n/a	TRUE	TRUE	TRUE	TRUE	45000	0	0	Percent Expenditure changes yearly depending on project priority.
Hamburg (Town of)	FALSE	FALSE	Also have 60,100 feet of pipe less than 12" dia	441800		34800		12200		6600	555500			7	2 storm water pump stations, 107 total outfalls. Calc # CB and MH's using 300' length	926	926	8	FALSE	no - however they have it.	no	portion of Highway and Engineering Dpts (36 person staff). Sewer Jet, gradall, backhoes, trucks, etc.	approximate $400,000 per year	proposing to conduct a townwide drainage study (master plan)	Bridge and culvert replacements - future needs may be developed from townwide study. 1.1 million was spent installing storm in Mt. Vernon area.	130K in 2008 for drainage-way maintenance, replacement of box culvert over Blasdell Creek	general needs - increase capacity.			FALSE	FALSE	FALSE	FALSE	400000	90	10	
Hamburg (Village of)	FALSE	TRUE		0		1500		0		0	74000	90% of 16.5 miles of roads with pipe on one side @ 300' between manhole	1	1		534	816	1 pump	FALSE	Yes-outfall mapping use only		Harley to provide info			09 Milford & Linora pipe crossing repair-pipe only. Village general funds		Village is maxed out with development	None - confirmed		FALSE	FALSE	FALSE	FALSE		100	0	Stormwater budget is line item of storm materials. $ for manpower, equip, maintenance & training- DPW budget - Harley to Provide
Lackawanna (City of)	FALSE	FALSE		0		0		0		0	0	ECSD #6 owns and maintains sewers		0		0	0		FALSE	yes	no	Street Sweeper 4-6 people (total of 18 months per year) to run2 sweepers two shifts per day								FALSE	FALSE	FALSE	FALSE		0	0	ECSD #6 owns and maintains storm
Lancaster	FALSE	FALSE		549120		0		0		0	549120	Pipe Length, CBs and MHs est by length of Town Roads. No delineation on size provided	97+	97	38 miles of open ditch	685	685		FALSE	beginning to implement	no	Seasonal (7 months per year) 8 full time workers. 2 street sweepers, 1 mini ex. 1 BH, 1 gradall, dump trucks as needed	covers maintenance - no number provided. CIP as needed.	none	none	2 BC replaced at a total of 800K	no storm master plan	any need for stormwater infrastructure will be addressed with development	none at the time	FALSE	FALSE	FALSE	FALSE	168004	100	0	Entire town is an MS4
Lancaster (Village of)	TRUE	FALSE		113255		10960		2620		10000	135835	no stormwater map, info scaled-fairly accurate	2	0		150	1101	0	FALSE	yes	no	attached	N/a - confirmed	N/a - confirmed	1992 Milton Drive Drainage Project -joint with Town of Lancaster, design done in house to correct drainage problems-Town doesn't do drainage projects at all anymore.	n/a - confirmed	n/a - confirmed	n/a - confirmed	n/a-confirmed	FALSE	TRUE	TRUE	FALSE	attached	100	0	All Village does are mill/overlay jobs - no more full street/storm replacements

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Lewiston (Town of)	FALSE	FALSE		247104		90605		24710		49421	411840		25 (1 public, 24 private)	25	1 pump station- a muckl and pump station		1000		FALSE	they have received the program and have been trained on it but have not started using it yet	no	part time stormwater manager <19 hours(no one assigned) contracted engineering firm reviews plans for the Town, 2 personnel from highway in drainage (2@40 hrs.) Streetsweeping- joint 3 way with other Towns. Equipment- backhoe,truck, bulldozer.	no $ in 2009 budget to implement stormwater plan as a separate line item may be in highway budget	none budgeted	in the process of a $90,000 culvert project on Lower River Road. Trying to stop bank erosion. 3/12 Town sued by private owner . Town Board directed project & $ came from general fund. $18, 000 repair to Muckland Pump Station in 2008-2009.	conversion of 28" sanitary sewer to gravity storm sewer use to convey storm water flows from Creek Road to the Lower Niagara River (1.75 miles)	n/a confirmed		Riverwalk subdivsion has caused a need for some upgrades in the northwest end of Town. Many areas in Town need drainage improvements but we don't have the funding.	FALSE	FALSE	FALSE	FALSE		100	0	the Town is still in the process of setting up a system and personnel for stormwater compliance.
Niagara County	TRUE	FALSE		190080		10560		5280		0	202000	Estimated Data - total 0f 202,000 LF - actual lenghts by size may require modification	0			350	350	2	FALSE	Use suspended after finding errors in software - County has rec'd no response to complaints	No - Paper system	Portion of Highway Services - no exact figures provided	No specific CIP - inc. in general PW budget	None provided - explaination that they only work within their MS4 area	No info provided	none specifically	Response - not handled by county	none they are aware of	none they are aware of	TRUE	FALSE	FALSE	TRUE	unknown	10	90	Obviously missing info on labor, master plan, and $$$ allocated to stormwater due to lack of tracking
Niagara Falls Water Board	FALSE	FALSE		126720		42240		31680		10560		211200 - about 40 miles	0			650	1500	2	FALSE	Program installed - awaiting update installation	Currently implementing a GBA CMMS package purchase / installation	Sewer maintenance supervisor, sewer cleaning and repair crews shared by sanitary / storm. Incs Vacs, Backhoe, Dump truck, air comp.	0	0	Proposed - meeting SPDES by implementation of "Treatment" devices	Purchase of vac-tron for all sewer cleaning (3 tot). Install sewer spoil dying area	none	none on public property	Some Storm Sewer repairs anticipated under 18-year 550 abatement program	FALSE	FALSE	FALSE	FALSE	237000	0	0	12 positions budgeted with sewer codes (4 storm 8 san) with cross-over as required

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North Tonawanda (City of)	TRUE	TRUE		170000		68000		51000		51000	340000		4 (2 public 2 private)	0	1/3 of cb go to a combined sewer	0	3560	1 (22 MGD Sewer Treatment Plant for combined sewers	FALSE	No- 1st disk didn't work @ City (training worked ok) waiting for 2nd disk	No	3 maintenance workers < 15% time, 3 wastewater maintenance helpers, 1 sweeper operator @ 60% time	$210,000 Marcia Drive & Sweeney Marion. $150, 000 Sweeney Marion-sep stormwater and sanitary $50,000 (district fee) special assesment to rebuild road with storm	$1,000,000 200K per year over 5 years all bonded/grants	$11,000,000 total - $3 million spent on installation of twin-102" to River (no one ties into yet, needs another 8 million to be useful)	Tremont- $500,000 (road and sewer project), Sweeney $400,000 ($270K in sotrm), Main $300,000 ($10, 000 for storm)	$20,000,000 (not a real number for real projects - this is a projection based on master plan)	$1,000,000 storm improvements to support residential development (Woodstream, Creekwoods, Prohaska Farms, Walck Road)		FALSE	FALSE	FALSE	FALSE		100	0	no separate budgeting for stormwater activities versus combined sewers and separate sanitary sewers
Orchard Park (Town of)	FALSE	FALSE				0		0		0	857261		0		2260	2260	12 CDS Units	FALSE	yes	no	No specifics provided - equipment and labor provided by sewer, water and highway staff and equipment resources	See Scanned "Problem Area Detail & Status" sheets	See Scanned "Problem Area Detail & Status" sheets	See Scanned "Problem Area Detail & Status" sheets					FALSE	FALSE	FALSE	FALSE		100	0	Equipment Resources include Sewer Jet /Flusher Truck and a street sweeper. Town adopted MS4 over whole town (code) though only 1/2 is officially MS4 in states eyes

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Pendleton (Town of)	FALSE	FALSE		172270		11241		2430		500	186441		7	7	130,000 feet open road ditch, 400,000 feet off road ditch open - info measured and documents (fairly accurate). Maintain 60 miles of road ditch & culvert pipe, ditch clean 4 miles of ditch per year. Sweep all subdivisions & clean catch basins as needed	65	219	0	FALSE	yes	no	14 full time employees & 2 seasonal employees. 2 employees work about 25 hours a week on stormwater - equipment on separate sheet.	$145,000	same as above	N/A will repair or replace when needed, cleaning of road & off road ditches when needed.	same as above and try to maintain 5 to 10 miles of ditch per year	N/A none known at this time	possible 4 new subdivisions, Town will make developer improve drainage	N/A	TRUE	TRUE	TRUE	TRUE	$145,000	100	0	
Tonawanda (City of)	FALSE	FALSE		98884		22180		12220		1038	136854	based on spreadsheets	1 detention pond	1	estimated cb/mh using 300' spacing	228	228	0	FALSE	no	no	2 jet / vac trucks, 1 group lead, 1 lab	125000 / year (primarily covers salaries and equipment)						possibly some requirement for Spaulding Fibre Site	FALSE	FALSE	FALSE	FALSE	125000 per yr	100	0	
Tonawanda (Town of)	FALSE	FALSE		601920		454080		300960		253440	1504800			14		2500	2500	0	FALSE	yes	GBA Master Series to handle all storm sewer maintenance	20% of 3 crew chiefs, 9 Maintenance Workers, 4 Laborers, 1 Mechanic Lead, mechanic. 3 combo mach, 1 flush truck, 3 winches, 1 O'Brien, 2 TV trucks	approx 100,000	3 million for Desmond / Dupont 2009 project and 100K per year	hist - 2008 2-Miles Creek improvments @ 1.2 million dollars (bonded)	see above	none	none	none	FALSE	FALSE	FALSE	FALSE	337901	100	0	budget represents 2008 #. Drainage district O&M by W&S division who is also responsible for Water and San systems

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West Seneca (Town of)	FALSE	FALSE		456155		34316		16827		14391	521689	Collected by direct measurement	There are some additional private/commercial detention ponds that they do not work on	11	Number of manholes and catch basins are combined	5745	0		FALSE	Starting to use the software, but changes to the DEC forms is a problem	No	Ditching Bucket, Grade-All, Flushing Truck, CCTV inspection equipment, Highway department also has a tow behind cleaner to assist in receiver cleanout.	Replace storm sewer associated with road rebuilds as needed, typcially do 2-3 roads/yr. Also completing a road reconstruction and sewer separation proj on Ludwig (1000', $440,000 in total costs). Collins Ave. flushing (4000' of storm sewer)	No proposed CIP except where associated with road rebuilds	Proposed - combined sewer separation along 5 to 6 streets near the City of Buffalo	Ice break structure on Cazenovia Creek - 2 million dollar project with US ACOE	None	Looking at the redevelopment of the West Seneca Development Center in the future	None	FALSE	FALSE	FALSE	FALSE	Have a drainage budget, but it is very small (33,500). Probably spend upwards of $200 to 250k	100	100	Also provided their permit compliance info that includes additional detail.
Wheatfield (Town of)	FALSE	FALSE		779000		5000		9100		8300	801400	104000 LF open ditch		34		425	425	0	FALSE	no	no	2 People, street sweeper, vac truck, pick-up, 1 large track hoe,							Larger outfall to Niagara River from Southern Drainage system	FALSE	FALSE	FALSE	FALSE		90	10	
Williamsville (Village of)	FALSE	FALSE		0		0		0		0	0			0	total of 4 outfalls, 1 sq miles in village limits	0	0		FALSE			street sweeper								FALSE	FALSE	FALSE	FALSE		0	0	Little info outside of "general Questions" provided
Youngstown - (Village of)	FALSE	FALSE		17500		3700		510			0		1	1	Length of Swales/ditches 20,800 LF	100	159	0	FALSE	yes- system installed in Village Clerks office December 2008	no	DPW crew- 4 employees, Village Engineer consultant (15-20% time dedicated to storm)	0	0	piped all roadside ditches in 1980's	none	N/A	Three subdivisions in conceptual design phase. Village adaptive reuse of cold storage facility	Maintanance of Robert Moses Parkway swales	TRUE	FALSE	FALSE	FALSE		100	0	organizational structure- 4 DPW emplyees cover all Village infrastructure issues. 16 man weeks $8,000+ annual rental for street sweeper and vactor

Nine General Questions about a Stormwater Utility District in Erie and Niagara County

1. What are the stormwater management goals of your community?
2. Would you support a stormwater utility district (SUD) in Erie and Niagara County?
3. What could hamper the creation of a SUD in Erie and Niagara County (i.e. potential roadblocks)?
4. Why might you want to participate in an SUD?
5. What level of centralization would you be comfortable with?
6. For example, what do you think about centralized ownership of staff and equipment?
7. What aspects of stormwater management would you like a SUD to complete for your community?
8. What aspects of stormwater management would you NOT like an SUD to complete for your community?
9. How do you feel about the idea of a stormwater utility fee versus and an increase in taxes?

Community Responses to the Nine General Questions:

A. City of Lackawanna – Steven Bremer, Code Enforcement Officer
    1. No large scale goals. No open ditches or ponds. Smokes Creek was recently dredged and outfalls to the creek are cleaned annually by prison workforce. Develop SWPPPs for construction projects that are over an acre. Will eventually need to deal with 400 acres that will come under city control. Would like to do stream rip rap updates in the future.
    2. Yes
    3. Nothing
    4. Would like to lighten stormwater related workload
    5. Would be comfortable with as much centralization as possible
    6. DPW does street sweeping, 2 street sweepers, 4 to 6 people – 8 months/yr on 2 shifts per day. Also use free prison workforce to maintain creeks, cut brush & remove debris, 2 to 3 months per year.
    7. Manage all aspects including street sweeping and minor tasks related to stormwater.
    8. Nothing
    9. Already collecting a fee through the county – wouldn't want any increases to be passed along to residents.

    Other Comments: The SUD is a good idea for the City of Lackawanna, no plans to ever take storm sewers back. City of Lackawanna is very open to a robust SUD – one that could manage all aspects of stormwater related activities from street sweeping to large scale storm sewer improvements. ECSD #6 already owns the storm sewers & city has no plans to take them back. ECSD #6 collects a storm sewer fee from users. The City would not

want any additional fees to be passed along to residents, just reallocate the fees currently being assessed by ECSD #6.

B. City of Tonawanda – Jason LaMonaco, City Engineer
    1. Maintenance of an aging system. City Center was developed in 1800s (20 to 30% of area) and the rest was built in the 1940s/1950s. Completely built out, nothing new recently. Redevelopment at water plant, veterans facility, Spaulding site (47 acres to be redeveloped into light industrial, commercial).
    2. Supportive of the idea – would be interested in being fully invested in the SUD
    3. Nothing
    4. Could switch manpower focus from storm sewer to sanitary sewer tasks already assigned to the City.
    5. Full ownership type of centralization, ownership of sewers and management of sw related tasks
    6. DPW invests a lot of time on this, would be concerned about union jobs – could be a problem if jobs appeared to be cut. Could allocate that job position to maintaining sanitary sewers.
    7. Total ownership. Street sweeping. Buy in & participation with existing Phase 2 program.
    8. Nothing
    9. No funding source currently. Fees preferred as there are a lot of non-taxable properties in the City. In the city they are exempt from taxation, but not from fees.

    Other Comments: Very supportive of a centralized SUD and would be interested in relinquishing ownership of the old stormwater system. There is some concern regarding the potential loss of union DPW folks who are focused on stormwater related O&M like street sweeping.

C. Village of Blasdell – Mike Wymer
    1. Compliance with NYSDEC regulations, steady upgrades to infrastructure.
    2. Concerned about startup costs, possibly if it isn't an entirely new agency.
    3. Same fees for each community wouldn't make sense. Political fighting, unequal sharing of services. Bigger communities would pay more – not same price as smaller areas.
    4. Lower costs to residents
    5. Would be comfortable with handing over ownership of storm sewers to the county.
    6. County's responsibility, not setup as a special district.
    7. Funding assistance, purchasing power, technical assistance & maintenance.
    8. Want to have a say in what is done, want input and control over which projects in their community will be implemented.
    9. Impartial – paid one way or the other.

Other Comments: Pro SUD, but are concerned about start up costs that would be associated with formation. Doesn't want another layer of government and thinks that a "county-run" district would make more sense. Are concerned about proportionality of funding – would larger communities pay more? Mike thinks they should.

D. Erie County Sewer District #6 – Matt Salah and Natalie Kernycznyj

Other Comments: No answers to the 9 questions, but they did have some general comments. Pro SUD, think that this is a good idea for both the City of Lackawanna and ECSD #6. Storm sewers are already owned by ECSD #6 in Lackawanna, and ECSD #6 is comfortable with participating in an SUD. Right now, ECSD #6 does not have jurisdiction to raise taxes for stormwater, but if ownership of the sewers were turned over to the SUD, then there would be no need for fees to be collected by ECSD #6.

E. Village of Williamsville – Marc Shuttleworth, Director of Public Works

1. Already built up and no stormwater problems to speak of. Spend their time on street sweeping, cleaning outfalls, maintenance & repair of sewers & manholes.
2. Need more information to make a decision, but right now don't think it is necessary. Just an extra layer of government and they currently have no fees for stormwater. Don't see the need for day to day operations.
3. No. Concerned about the fees that would be assessed.
4. Need to demonstrate benefits to the community. Quicken approval process for projects, clean water, getting grants (understanding bigger picture, examples of salt mgmt & clean water), and ideas for overall stormwater management – material generated from street sweeping.
5. Village would want to maintain ownership of their system. Financially, they can handle their system (system is in good shape, village is on rock and can drain easily) and doesn't see the value of turning over ownership to the residents. Dealing with larger regional issues is preferred to full ownership for the SUD.
6. Equipment is multi-tasking and used for other services. Street sweepers are used year round. Would consider shared services, but needs to be shown the benefits.
7. See answer to #5.
8. See answer to #4.
9. No new fees or taxes. But, not completely against fees just need to show benefits. There are some legitimate fees like development w/ addition of inspection fees for infrastructure.

Other Comments: Village is small (less than 1 sq. mile) and doesn't have an interest in formation of an SUD that would manage day to day operations such as street sweeping. Is interested in an SUD that would focus on implementation of big regional projects and bring in grant money. Would not

want to turn over ownership of equipment, personnel, or sewers over to the county or the SUD. Doesn't want to add another layer of gov't that would just make getting things done take even longer. No new fees!

F. Town of Lancaster
    1. To properly operate and maintain the stormwater system in an economical manner and in compliance with the NYS mandated stormwater permit program.
    2. Yes, if it is implemented in a way that provides an economical approach to address the needs of the community.
    3. Loss of local control of planning and policy decisions.
    4. We can envision that there are certain tasks that may require specialized equipment or staff and that make it more practical and economical for sharing in some capacity. Furthermore, as a centralized staff, the possibility of financial assistance from the state level may increase.
    5. See below answer
    6. Centralized ownership for staff and equipment for tasks such as vac truck work or illicit discharge identification and tracking could be very cost effective.
    7. Specialized activities that require specialized equipment that would only be utilized by the Town on an occasional basis.
    8. The Town would want to retain control of setting policies, planning and review of new development within the Town including stormwater aspects. Furthermore, any implementation of stormwater improvements within the Town would require direct Town involvement, even if some funding for improvements might be made available from an SUD.
    9. Open to the concept of fees or taxes.

G. Town of Grand Island – John Whitney
    1. Just meet the mandates as the program is unfunded by the state or federal government. Do what they can within their budget to mitigate flooding, not a lot of concern about water quality other than meeting the Phase 2 requirements.
    2. Yes, to what extent is a question.
    3. Roadblock – amount of taxation
    4. Better knowledge base, joint lobbying efforts for grants, etc.
    5. Centralization of off-road maintenance of creeks/ditches/ponds would be helpful; Town can handle catch basins, manholes, and pipes along the roads.
    6. See #5, ok for the off-road side of things
    7. Off-Road maintenance, water quality testing for IDDE, training/public participation, pollution prevention/good housekeeping, review of SWPPPs, plans, and follow up inspections. Basically, everything but roadside systems. Highway department already has staff/equipment for this and they need something to do when it isn't snowing.
    8. See #7

9. Does a vacant property or a subdivision without homes get a benefit of not paying because they don't have any impervious area other than the road?

H. Town of Amherst – Jeff Angiel
    1. Permit Compliance, Flood Control and nuisance flooding
    2. Depends on the level of authority
    3. Political issues, taking over too much control. Have to be careful about shipping money to other communities from the residents of Amherst.
    4. See #7
    5. Outfall inspection, education, public outreach
    6. No
    7. Watershed approach to drainage and flooding concerns, planning strategies to look at all areas along Tonawanda Creek (for example)
    8. Tough to send our money to other areas
    9. Everything in Amherst is a tax; really don't use fees in the Town. Keeps things consolidated.

I. Town of Cheektowaga - Bill Pugh, Town Engineer
    1. Provide better stormwater management (no detention in the past) as properties redevelop, add storm sewers to older neighborhoods without sewers, more quantity control than quality.
    2. To a limited degree: agree 110% with the coalition as the Towns would be lost without it. Concern with a bigger district – send majority of money to "Albany" and get crumbs back. Also, concerns over GASB 34 requirements. Concerned about response times – if there is a blockage, Town can respond quickly; larger district may take more time. Don't want to fund other peoples issues.
    3. See #2, also union contracts could be a big issue
    4. Coalition activities have been beneficial, but expanding that is hard to justify relative to infrastructure.
    5. Coalition level, but not beyond.
    6. See previous answers
    7. See previous answers
    8. See previous answers
    9. Another level of government would not be accepted by the public.

J. Town of Tonawanda – Mike Kaiser and David Decker
    1. Compliance with the regulations
    2. Yes
    3. Initial startup costs, lack of education on an SUD, logistics
    4. The ability to repair problems that go without repair due to a lack of resources. SUD should be used to fund major repairs, help with prioritization
    5. Would not want an SUD to take over control of the infrastructure
    6. Small targeted options might be ok, but would not be for this in general.
    7. Repairs, permit assistance, help with grants
    8. Construction, Maintenance

9. In their experience, fees can be accepted. They added a $5.00 surcharge to bills for water system repair with little resistance.

K. Town of Cambria –
   1. Control construction runoff impacts from erosion, installing rip-rap for erosion control (especially along the escarpment), and keeping drainage ways open to prevent flooding.
   2. Yes, something between the extremes that maybe would grow over time, cost to taxpayers is a major concern.
   3. Higher taxes and fees, significant reservations of turning over control of all drainage facilities to the district.
   4. If it is cost effective for the Town – has been cost effective so far for the coalition. To enable regional projects to get done (but not by raising taxes or fees).
   5. Hard to define: Comfortable with coalition functions, not comfortable with turning over all assets.
   6. Not in favor
   7. Regional flooding problems, training, public education, getting grants
   8. See other answers
   9. A fee is still a tax, not in favor if there would be an additional fee on top of what the Town is already collecting. Concerned with losing control of taxes.

L. Niagara Falls Water Board – Rick Roll
   1. Maintain service within a compliant stormwater program, focus on MCMs that apply to the Niagara Falls Water Board as a non-traditional MS4.
   2. No. Do support participation in the coalition going forward. Not willing to relinquish any control; certainly not control of any charges to city taxpayers.
   3. Concerned over actual or perceived increases in fees. Even breaking out sewer and storm as separate fees would raise concern.
   4. No regional concerns from stormwater impact the city. All creeks are under the City's responsibilities.
   5. No response
   6. No response
   7. No response
   8. No response
   9. No response

M. Town of Eden – Ron Maggs
   1. Just the SPDES requirements over the MS4 area
   2. Hard to tell unless it is laid out. Concerned about ownership & also job loss. Tracking of cleaning/maintenance would be helpful. Also concerned about drainage systems that no one owns – they haven't been maintained in a long time. Need help and coordination with items that people have trouble meeting with the regulations. No need to recreate the wheel, just

help where help is needed. Also interested in sharing of specialized equipment; for example, maybe a hydro-seeder "on-call."
3. Want to keep ownership of their assets. Shouldn't try to hide the costs in taxes, make it transparent with a fee. If SUD is too helpful, it may be hard to accept.
4. IDDE Help! Help to comply with requirements if the cost is reasonable.
5. As much as is required – specifically tracking and specialty equipment
6. See question #5
7. Specialized help – tracking and specialty services. Nothing general, i.e. what you can easily comply with today. "Above and Beyond" what they can easily complete.
8. Do not want SUD ownership of assets
9. Prefer utility fee, rather have it in the open instead of hidden in taxes.

N. Town of Clarence – Joe Latona and Tim Lavocat
1. Reduce flooding; stormwater quantity control; stormwater quality – only doing what they are mandated to do.
2. Support the formation of a technical subcommittee to develop reasonable/practical solutions. Concerned that the SUD is an idea to keep the coalition working on an expanded basis. However, have fully supported coalition activities to date and think they have been a benefit to the region, mainly due to the staff involved. Not in favor of coalition activities increasing and may be time to reduce what coalition is doing. For example: Not in favor of paying staff to manage Buffalo State students to inspect outfalls; Town has already been trained to do this.
3. Lack of control by the individual MS4s of costs and planning. Would not support new taxes or fees. Erie/Niagara regional planning board went away because it got too political; side deals being made. Non-local prioritization of projects.
4. Regional projects like Tonawanda Creek flooding
5. Not in favor of SUD taking over assets & staff. Would be in favor of centralized training, etc. like the coalition is already doing.
6. See previous answers
7. See previous answers
8. See previous answers
9. A fee is a tax

O. Niagara County – Rick Eakin
1. No response
2. From the county perspective, doesn't see them being involved. Thinks that municipalities are driving the bus – Niagara County doesn't have very much MS4 area. Doesn't know if it makes sense to implement in Niagara County, no strong feeling either way – needs more information from the

municipalities in the county to see what support exists for an SUD. Will further evaluate once a plan is proposed.

3. No response
4. No response
5. No response
6. No response
7. No response
8. No response
9. No response

P. Town of Orchard Park – Wayne Bieler

1. Need to establish a level of service; right now that goal depends on who you ask. Have been proactive in meeting regulations. Current drainage basis of design is to match 10,25,50, 100yr design storms peak flows for pre and post construction.
2. Depends on what it is, local control will always be important.
3. Need to have local control, older infrastructure in some communities compared to others with newer infrastructure, different standards between municipalities for storm facilities.
4. Developing regional standards on a watershed basis, addressing regional drainage problems that don't stop at Town boundaries.
5. Grants, education & training, having the ability to tap into resources of a "district" to help with IDDE trackdown (i.e. having a lab to access or other expertise, samping equipment)
6. Maybe some ownership of equipment to be shared may make sense as a backup. Is there a way to share existing equipment that Towns already have? Televising equipment may make sense to share, sandbags for flooding, agreements with third parties to clear brush, etc. There is an issue with sharing equipment though – how do you structure fees to pay for this if not all Towns need it?
7. See question #5
8. Would want to maintain control of their local stormwater systems
9. Both will be seen as an increased cost or a "tax."

Other Comments: Concerned that it won't fly politically. Once you "raise the bar" as to what you are doing, more people will want more stuff done.

Q. Town of Wheatfield –

1. Comply with regulations for water quantity and quality treatment, prevent & mitigate flooding
2. Would not support a full takeover of Town utilities, personnel and equipment. However, some form of regional utility/coalition makes sense; maybe just what the coalition is doing. Hard to say whether an extra tax will be accepted, even for regional drainage problems.
3. Extra layer of government and extra taxes, extra level of plan review would be seen as hindering economic development.

4. Participation in the coalition should continue.
5. Coalition activities
6. Wouldn't want it.
7. Same as Coalition
8. See above answers
9. Would need to talk to the Town Board about this.

R. Buffalo Sewer Authority
    1. Did not answer the questions

S. Town of West Seneca
    1. Meeting the regulations
    2. In a limited fashion
    3. Political Issues
    4. Ability to get funding for stormsewer projects, public relations and education, programs similar to the current IDDE function
    5. Not very interested in centralization, worried about how it could work against the Town, concerned about enforcement with a centralized group
    6. Do not want centralized staff and equipment, they have what they need
    7. Funding, education
    8. Ownership of asssets
    9. Not sure about taxes versus fees. Are more interested in how you would spend the money. Would the decisions be made by the coalition or the localities? How would it be split among the communities?

T. Erie County Department of Public Works – Brian Rose
    1. Full compliance with the permit
    2. If it resulted in additional funding, we would be interested
    3. Local control, political dimension of it. How do you get the approval of so many different communities?
    4. Funding
    5. Concerned about legal aspects of centralization – who would hold the MS4 permit? Could see some centralized equipment, but how do you pay for it equally amongst the communities that use it? Possibly for centralized maintenance
    6. Would object to centralized control of the assets
    7. See above answers
    8. See above answers
    9. Doesn't matter, both seen as an increase in costs

U. Town of Hamburg – Jerry Kapsiak, Town Engineer
    1. To properly operate and maintain our stormwater systems in compliance with the Phase II Federal and State Stormwater Regs and MS4 Permit requirements.

2. My intial feeling is yes, but I would like to know more details about it before making a formal determination and recommendation to the Town board for their consideration and decision in this regard.
3. One roadblock may be if there is expected to be a financial contribution from the municipalities and/or taxpayers, and if so, how much?
4. To relieve the workload, burden, and costs of the stormwater requirements on the Town of Hamburg.
5. The more centralization the better, as long as the equipment and services will be capably provided and promptly available to the Town of Hamburg when we need them.
6. See answer to question #5
7. All aspects
8. None
9. Neither is acceptable. All costs should be bourne by the Federal and State governments, since they are the ones who have imposed these overly burdensome regulations on the municipalities.

V. Village of Alden – Keith Sitzman, Supt. of Public Works

- The Village doesn't get response from current county agencies. Example: collapsed CB in county road by school since last summer that still isn't repaired - how will SUD prioritize responses
- Village wouldn't likely support complete takeover of infrastructure by county but may support a district that is run by the coalition or a subset of the county
- Tax would likely be best option to fund SUD
- County can't manage what they currently have, how can they take on more?
- Village would likely support an SUD set up based on watershed, region or geography.
- Shared services between member communities would be good.

W. Village of Angola – Jeff Kaminski, General Crew Chief

- Village is currently overwhelmed with SPDES regs and requirements.
- Jeff suggested an SUD to the Coalition about 2 years ago to handle all SPDES stuff (inspections/reports) and would continue to support the creation of an SUD.
- $ to support an SUD could be a budget line item that results in a tax increase
- Would support a county based delineation with regional representation
- Would support an SUD having equipment & doing effort necessary to comply with SPDES regs
- Board & Jeff fully support a district and any help that they can get

X. Town & Village of Aurora- Bill Kramer

- Nobody within the Town & Village outside of Bldg/hwy knows/responds to stormwater concerns
- Town of Aurora has 5 outfalls
- Based on what Town & Village are currently doing and planning on doing, they can handle it and don't know if there would be a benefit to a district
- Village & Town politics will likely take the stand that everything is fine now and don't need to change unless they could save $
- To support an SUD, they would need proof that Village and Town would benefit and level of public services wouldn't change
- Town & Village are happy with the way the sewer district functions so there may be some benefit to comparing a new SUD to the existing sewer district.
- How would fee structure be established - Village would need more from an SUD than the Town would – how would the fee structure be kept fair and proportional to level of required service.
- Response time - priority for emergencies

Y. Town of Elma- Jim Wyzykiewicz, Engineer

- There are 40.8 miles of Town Road with ½ piped on both sides. 10 miles of subdivision with CB @ 125' between CB and 30 miles of country with few CB
- Not many CB in country roads
- Country road drainage systems convey sump pumps, field ditches, roof leaders
- Mostly 12-24" pipe
- An SUD would receive minimal support from Town.
- Town would be very hesitant because they don't do anything now and have no plans to.
- Minimal industrial discharges and each site has controlled and "sophisticated" stormwater treatment systems.
- How would fee structure be created- could they only pay for needed service – is it all or nothing?
- Would consider using SUD as resource to review SWPPP for big projects but doesn't expect big need for this
- The public will fight anything that will cost them $ because they don't feel that there is anything wrong with their current way of doing things.
- Town does not currently have a Town Tax and would not support creating one – so not sure how the SUD would be funded.

Z. Village of Hamburg-Harland E. Moses- Supt. Of Public Works

- Would love to give up outfall inspections
- The majority of his department's responsibilities are stormwater based and he wouldn't want to give up work/responsibilities that would result in him losing staff or budget.
- They want to keep daily maintenance, no change over existing conditions, but would fully support SUD that handled SPDES stuff
- Would support SUD that funded itself because taxpayers won't accept a new fee with no visual difference in services

AA. Village of Lancaster-Marc J. Gee, Superintendent

- Wouldn't want to lose employees, $ or equipment
- Doesn't have a lot of employees to do stormwater maintenance
- Shared equipment doesn't go so well because the equipment gets ruined and returned damaged
- Mark has no problem with shared services using shared equipment – he supports sharing staff and equipment as a unit – his guys running his equipment.
- Mark doesn't want resident's response time and level of service to suffer. A big district could have low response time for smaller communities
- Village would want to maintain review of project plans

BB. Town of Lewiston- Steve Reiter, Highway Superintendent

- Street sweeper is shared service
- Town Engineering is outsourced to CRA
- Town does not currently have an organized stormwater management team but is working on it.
- Would like a central organization that sets the design standards, rules and specifications and then the Town would follow them.
- Would support an SUD to manage SPDES requirements.
- SUD delineation based on geography or at least geographic representation within the district.
- SUD funding would have to come from taxes.

CC. Village of Lewiston- Mike Marino & Terry Brolinski

- How would fee structure be established - how would the fee structure be kept fair and proportional to level of required service.
- How will the Village of Lewiston rank when there is a problem
- Will there be a change to the level of service that the Village residents are used to?
- Would support an SUD that did all MS4/SPDES required effort
- Supports group applications for grants instead of the Village applying alone
- Wouldn't want to give up maintenance/responsibility of the infrastructure

DD. North Tonawanda Dale Marshall & Gary

- Both would support SUD that handles all MS4 tasks and requirements
- $ to support SUD would have to come from General Fund
- Would not be in favor of SUD taking over storm infrastructure or design parameters.

EE.Town of Pendleton-James Argo, Water/Sewer Superintendent

- Town is in general compliance with new regulations and plan to maintain the program in the future.
- They plan to get highway garage in compliance.
- They would likely support the creation of an SUD via a complete takeover and/or monitoring of Town program
- Fully supported
- Would support an SUD that took over all of the stormwater management responsibilities.
- Highway may want to give up its portion if budget remains the same
- Could be funded by tax increase based on assessment but the ultimate $ decision is up to the politicians, not Jim

Billing Basis Assessment
Western New York Stormwater Coalition SUD FS

Appendix E
Land Area Summary For All WNYSC Communities By District and Community

District	Community	RPS Group Description	RPS Code	# of Parcels	Total Assessment ($)	Area (Sq Ft)	Acres	% Total Area	Median Impervious Area (Sq Ft)	Total Impervious Area (Sq Ft)
District 1										
Alden										
1	Alden	0 Series	0 Series	179	$0	135,264,821	3,106	0.309%	0	0
1	Alden	Agricultural	100 Series	129	$142,651,886	392,229,319	9,006	0.897%	0	0
1	Alden	Residential - One Family	200 & 210 Codes	1,841	$268,043,294	321,416,344	7,380	0.735%	3,787	6,971,867
1	Alden	Residential - Other	All other 200 Series Codes	277	$45,137,782	393,316,180	9,031	0.899%	3,787	1,048,999
1	Alden	Vacant Land	300 Series	389	$8,690,480	250,248,224	5,746	0.572%	0	0
1	Alden	Commercial	400 Series	149	$19,154,490	36,058,860	828	0.082%	14,808	2,206,392
1	Alden	Recreation and Entertainment	500 Series	45	$1,054,800	9,263,746	213	0.021%	14,808	666,360
1	Alden	Community Services	600 Series	58	$862,262,400	73,907,726	1,697	0.169%	14,808	858,864
1	Alden	Industrial	700 Series	33	$9,248,500	11,130,711	256	0.025%	14,808	488,664
1	Alden	Public Services	800 Series	61	$1,241,400	15,652,399	359	0.036%	14,808	903,288
1	Alden	Wild, Forested, Conservation Lands and Public Parks	900 Series	29	$561,400	17,744,303	407	0.041%	0	0
			Subtotal for Alden	**3,190**	**1,358,046,432**	**1,656,232,632**	**38,027**	**3.786%**		**13,144,434**
Aurora										
1	Aurora	0 Series	0 Series	80	$0	33,954,831	780	0.078%	0	0
1	Aurora	Agricultural	100 Series	35	$9,066,000	50,733,401	1,165	0.116%	0	0
1	Aurora	Residential - One Family	200 & 210 Codes	2,406	$438,435,266	455,677,207	10,462	1.042%	3,787	9,111,522
1	Aurora	Residential - Other	All other 200 Series Codes	395	$101,837,100	667,694,358	15,330	1.526%	3,787	1,495,865
1	Aurora	Vacant Land	300 Series	708	$17,087,650	502,406,587	11,535	1.148%	0	0
1	Aurora	Commercial	400 Series	128	$20,661,400	23,074,780	530	0.053%	14,808	1,895,424
1	Aurora	Recreation and Entertainment	500 Series	52	$1,776,800	21,630,913	497	0.049%	14,808	770,016
1	Aurora	Community Services	600 Series	55	$80,566,000	34,407,737	790	0.079%	14,808	814,440
1	Aurora	Industrial	700 Series	22	$819,000	2,449,512	56	0.006%	14,808	325,776
1	Aurora	Public Services	800 Series	72	$5,796,400	5,378,759	123	0.012%	14,808	1,066,176
1	Aurora	Wild, Forested, Conservation Lands and Public Parks	900 Series	47	$28,922,600	74,384,714	1,708	0.170%	0	0
			Subtotal for Aurora	**4,000**	**$704,968,216**	**$1,871,792,799**	**42,976**	**4.278%**		**15,479,219**

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Boston										
1	Boston	0 Series	0 Series	95	$0	63,216,492	1,451	0.144%	0	0
1	Boston	Agricultural	100 Series	141	$35,667,030	392,133,403	9,003	0.896%	0	0
1	Boston	Residential - One Family	200 & 210 Codes	2,401	$748,246,600	537,475,028	12,340	1.229%	3,787	9,092,587
1	Boston	Residential - Other	All other 200 Series Codes	385	$128,718,620	443,610,799	10,185	1.014%	3,787	1,457,995
1	Boston	Vacant Land	300 Series	559	$41,144,860	444,273,345	10,201	1.016%	0	0
1	Boston	Commercial	400 Series	162	$53,657,000	21,918,982	503	0.050%	14,808	2,398,896
1	Boston	Recreation and Entertainment	500 Series	43	$1,071,600	7,824,539	180	0.018%	14,808	636,744
1	Boston	Community Services	600 Series	63	$18,365,200	13,595,933	312	0.031%	14,808	932,904
1	Boston	Industrial	700 Series	21	$898,800	479,757	11	0.001%	14,808	310,968
1	Boston	Public Services	800 Series	78	$4,916,494	12,106,620	278	0.028%	14,808	1,155,024
1	Boston	Wild, Forested, Conservation Lands and Public Parks	900 Series	32	$1,918,000	66,557,051	1,528	0.152%	0	0
			Subtotal for Boston	**3,980**	**$1,034,604,204**	**$2,003,191,947**	**45,993**	**4.579%**		**15,985,118**
Cambria										
1	Cambria	0 Series	0 Series	19	$3,486,440	49,137,181	1,128	0.112%	0	0
1	Cambria	Agricultural	100 Series	190	$32,020,400	919,052,280	21,101	2.101%	0	0
1	Cambria	Residential - One Family	200 & 210 Codes	1,618	$411,564,200	339,103,190	7,786	0.775%	3,787	6,127,366
1	Cambria	Residential - Other	All other 200 Series Codes	279	$79,830,800	486,658,377	11,174	1.112%	3,787	1,056,573
1	Cambria	Vacant Land	300 Series	487	$22,661,400	373,788,984	8,582	0.854%	0	0
1	Cambria	Commercial	400 Series	112	$34,436,200	35,420,696	813	0.081%	14,808	1,658,496
1	Cambria	Recreation and Entertainment	500 Series	45	$4,807,000	10,679,190	245	0.024%	14,808	666,360
1	Cambria	Community Services	600 Series	66	$167,573,000	59,543,343	1,367	0.136%	14,808	977,328
1	Cambria	Industrial	700 Series	24	$1,710,800	4,567,975	105	0.010%	14,808	355,392
1	Cambria	Public Services	800 Series	55	$18,108,800	10,629,844	244	0.024%	14,808	814,440
1	Cambria	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
			Subtotal for Cambria	**2,921**	**$776,199,040**	**$2,288,581,061**	**52,546**	**5.231%**		**11,655,955**

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Clarence										
1	Clarence	0 Series	0 Series	193	$0	72,477,062	1,664	0.166%	0	0
1	Clarence	Agricultural	100 Series	42	$6,119,800	74,698,976	1,715	0.171%	0	0
1	Clarence	Residential - One Family	200 & 210 Codes	8,960	$4,445,282,800	770,139,556	17,682	1.760%	3,787	33,931,520
1	Clarence	Residential - Other	All other 200 Series Codes	583	$277,339,000	658,550,925	15,120	1.505%	3,787	2,207,821
1	Clarence	Vacant Land	300 Series	1,331	$201,775,700	939,600,205	21,573	2.148%	0	0
1	Clarence	Commercial	400 Series	556	$624,063,800	135,900,269	3,120	0.311%	14,808	8,233,248
1	Clarence	Recreation and Entertainment	500 Series	66	$29,373,800	85,083,401	1,954	0.194%	14,808	977,328
1	Clarence	Community Services	600 Series	117	$224,240,000	95,679,802	2,197	0.219%	14,808	1,732,536
1	Clarence	Industrial	700 Series	41	$36,452,500	51,187,251	1,175	0.117%	14,808	607,128
1	Clarence	Public Services	800 Series	111	$11,242,750	19,528,094	448	0.045%	14,808	1,643,688
1	Clarence	Wild, Forested, Conservation Lands and Public Parks	900 Series	38	$11,955,200	57,136,917	1,312	0.131%	0	0
			Subtotal for Clarence	**12,038**	**$5,867,845,350**	**$2,959,982,458**	**67,961**	**6.766%**		**49,333,269**
Eden										
1	Eden	0 Series	0 Series	69	$0	47,979,733	1,102	0.110%	0	0
1	Eden	Agricultural	100 Series	199	$41,911,168	568,273,207	13,048	1.299%	0	0
1	Eden	Residential - One Family	200 & 210 Codes	2,256	$462,980,504	414,973,182	9,528	0.949%	3,787	8,543,472
1	Eden	Residential - Other	All other 200 Series Codes	442	$111,284,418	722,134,011	16,580	1.651%	3,787	1,673,854
1	Eden	Vacant Land	300 Series	417	$14,920,728	357,335,132	8,204	0.817%	0	0
1	Eden	Commercial	400 Series	158	$29,272,322	20,713,080	476	0.047%	14,808	2,339,664
1	Eden	Recreation and Entertainment	500 Series	51	$4,548,600	10,389,705	239	0.024%	14,808	755,208
1	Eden	Community Services	600 Series	71	$111,420,916	26,753,332	614	0.061%	14,808	1,051,368
1	Eden	Industrial	700 Series	27	$3,454,800	4,683,320	108	0.011%	14,808	399,816
1	Eden	Public Services	800 Series	80	$8,469,583	12,221,989	281	0.028%	14,808	1,184,640
1	Eden	Wild, Forested, Conservation Lands and Public Parks	900 Series	27	$307,800	34,019,637	781	0.078%	0	0
			Subtotal for Eden	**3,797**	**$788,570,839**	**$2,219,476,330**	**50,959**	**5.073%**		**15,948,022**

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District	Community	RPS Group Description	RPS Code	# of Parcels	Total Assessment ($)	Area (Sq Ft)	Acres	% Total Area	Median Impervious Area (Sq Ft)	Total Impervious Area (Sq Ft)
Elma										
1	Elma	0 Series	0 Series	75	$0	23,318,327	535	0.053%	0	0
1	Elma	Agricultural	100 Series	93	$840,278	169,779,092	3,898	0.388%	0	0
1	Elma	Residential - One Family	200 & 210 Codes	3,823	$100,138,040	675,369,815	15,506	1.544%	3,787	14,477,701
1	Elma	Residential - Other	All other 200 Series Codes	427	$12,377,662	368,766,197	8,467	0.843%	3,787	1,617,049
1	Elma	Vacant Land	300 Series	857	$3,925,650	388,569,903	8,922	0.888%	0	0
1	Elma	Commercial	400 Series	209	$9,903,600	36,813,020	845	0.084%	14,808	3,094,872
1	Elma	Recreation and Entertainment	500 Series	58	$2,088,064	66,765,615	1,533	0.153%	14,808	858,864
1	Elma	Community Services	600 Series	87	$7,310,400	34,733,868	797	0.079%	14,808	1,288,296
1	Elma	Industrial	700 Series	46	$10,327,876	47,770,041	1,097	0.109%	14,808	681,168
1	Elma	Public Services	800 Series	92	$1,633,508	40,494,919	930	0.093%	14,808	1,362,336
1	Elma	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
			Subtotal for Elma	**5,793**	**$148,545,078**	**$1,852,380,797**	**42,531**	**4.234%**		**23,380,286**
Evans										
1	Evans	0 Series	0 Series	996	$0	318,750,678	7,319	0.729%	0	0
1	Evans	Agricultural	100 Series	57	$4,422,400	123,015,712	2,824	0.281%	0	0
1	Evans	Residential - One Family	200 & 210 Codes	4,473	$581,725,460	363,314,429	8,342	0.830%	3,787	16,939,251
1	Evans	Residential - Other	All other 200 Series Codes	718	$111,997,900	550,698,344	12,644	1.259%	3,787	2,719,066
1	Evans	Vacant Land	300 Series	2,385	$36,441,218	606,484,031	13,925	1.386%	0	0
1	Evans	Commercial	400 Series	207	$66,937,544	43,532,981	1,000	0.100%	14,808	3,065,256
1	Evans	Recreation and Entertainment	500 Series	60	$28,758,200	32,288,652	741	0.074%	14,808	888,480
1	Evans	Community Services	600 Series	75	$44,971,800	28,789,050	661	0.066%	14,808	1,110,600
1	Evans	Industrial	700 Series	23	$9,894,000	1,421,495	33	0.003%	14,808	340,584
1	Evans	Public Services	800 Series	98	$142,841,647	29,207,720	671	0.067%	14,808	1,451,184
1	Evans	Wild, Forested, Conservation Lands and Public Parks	900 Series	31	$4,220,800	6,095,248	140	0.014%	0	0
			Subtotal for Evans	**9,123**	**$1,032,210,969**	**$2,103,598,340**	**48,299**	**4.808%**		**26,514,421**

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Grand Island										
1	Grand Island	0 Series	0 Series	54	$0	26,476,878	608	0.061%	0	0
1	Grand Island	Agricultural	100 Series	26	$25,000	533,829	12	0.001%	0	0
1	Grand Island	Residential - One Family	200 & 210 Codes	6,827	$1,169,588,894	547,912,135	12,580	1.252%	3,787	25,853,849
1	Grand Island	Residential - Other	All other 200 Series Codes	122	$10,957,000	2,991,807	69	0.007%	3,787	462,014
1	Grand Island	Vacant Land	300 Series	1,667	$38,695,921	538,064,051	12,354	1.230%	0	0
1	Grand Island	Commercial	400 Series	231	$117,897,670	43,194,366	992	0.099%	14,808	3,420,648
1	Grand Island	Recreation and Entertainment	500 Series	105	$24,795,240	54,389,037	1,249	0.124%	14,808	1,554,840
1	Grand Island	Community Services	600 Series	74	$76,537,580	57,554,017	1,321	0.132%	14,808	1,095,792
1	Grand Island	Industrial	700 Series	45	$44,257,380	14,638,962	336	0.033%	14,808	666,360
1	Grand Island	Public Services	800 Series	74	$13,338,220	26,771,407	615	0.061%	14,808	1,095,792
1	Grand Island	Wild, Forested, Conservation Lands and Public Parks	900 Series	36	$113,070,600	122,276,235	2,807	0.279%	0	0
Subtotal for Grand Island				**9,261**	**$1,609,163,505**	**$1,434,802,723**	**32,943**	**3.280%**		**34,149,295**
Lewiston										
1	Lewiston	0 Series	0 Series	43	$2,708,284,868	810,922,265	18,619	1.854%	0	0
1	Lewiston	Agricultural	100 Series	149	$29,383,000	635,120,053	14,582	1.452%	0	0
1	Lewiston	Residential - One Family	200 & 210 Codes	4,260	$1,066,734,802	327,529,585	7,520	0.749%	3,787	16,132,620
1	Lewiston	Residential - Other	All other 200 Series Codes	252	$58,855,800	265,950,066	6,106	0.608%	3,787	954,324
1	Lewiston	Vacant Land	300 Series	871	$48,630,502	394,128,678	9,049	0.901%	0	0
1	Lewiston	Commercial	400 Series	138	$50,765,600	25,346,361	582	0.058%	14,808	2,043,504
1	Lewiston	Recreation and Entertainment	500 Series	49	$11,937,000	59,304,780	1,362	0.136%	14,808	725,592
1	Lewiston	Community Services	600 Series	82	$419,338,300	134,611,611	3,091	0.308%	14,808	1,214,256
1	Lewiston	Industrial	700 Series	27	$47,662,400	55,921,797	1,284	0.128%	14,808	399,816
1	Lewiston	Public Services	800 Series	71	$43,228,428	98,524,626	2,262	0.225%	14,808	1,051,368
1	Lewiston	Wild, Forested, Conservation Lands and Public Parks	900 Series	30	$18,807,800	108,245,337	2,485	0.247%	0	0
Subtotal for Lewiston				**5,972**	**$4,503,628,500**	**$2,915,605,159**	**66,942**	**6.664%**		**22,521,480**

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Pendleton										
1	Pendleton	0 Series	0 Series	27	$6,698,204	22,519,124	517	0.051%	0	0
1	Pendleton	Agricultural	100 Series	107	$19,339,400	397,934,546	9,137	0.910%	0	0
1	Pendleton	Residential - One Family	200 & 210 Codes	2,079	$680,245,100	363,075,887	8,336	0.830%	3,787	7,873,173
1	Pendleton	Residential - Other	All other 200 Series Codes	186	$58,359,000	256,574,686	5,891	0.586%	3,787	704,382
1	Pendleton	Vacant Land	300 Series	421	$38,229,600	336,027,133	7,715	0.768%	0	0
1	Pendleton	Commercial	400 Series	122	$44,516,200	27,739,586	637	0.063%	14,808	1,806,576
1	Pendleton	Recreation and Entertainment	500 Series	47	$12,448,400	41,408,137	951	0.095%	14,808	695,976
1	Pendleton	Community Services	600 Series	51	$64,219,000	31,403,271	721	0.072%	14,808	755,208
1	Pendleton	Industrial	700 Series	24	$5,105,694	5,240,020	120	0.012%	14,808	355,392
1	Pendleton	Public Services	800 Series	49	$900,000	2,423,525	56	0.006%	14,808	725,592
1	Pendleton	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
			Subtotal for Pendleton	**3,139**	**$930,060,598**	**$1,484,345,915**	**34,081**	**3.393%**		**12,916,299**
Porter										
1	Porter	0 Series	0 Series	11	$5,523,878	71,020,793	1,631	0.162%	0	0
1	Porter	Agricultural	100 Series	173	$11,776,000	605,021,486	13,891	1.383%	0	0
1	Porter	Residential - One Family	200 & 210 Codes	1,665	$417,994,200	401,812,066	9,226	0.918%	3,787	6,305,355
1	Porter	Residential - Other	All other 200 Series Codes	206	$45,206,400	254,323,253	5,839	0.581%	3,787	780,122
1	Porter	Vacant Land	300 Series	482	$15,743,270	253,186,228	5,813	0.579%	0	0
1	Porter	Commercial	400 Series	112	$18,942,200	23,843,236	547	0.055%	14,808	1,658,496
1	Porter	Recreation and Entertainment	500 Series	48	$5,835,200	20,681,229	475	0.047%	14,808	710,784
1	Porter	Community Services	600 Series	50	$68,815,500	38,431,922	882	0.088%	14,808	740,400
1	Porter	Industrial	700 Series	26	$46,432,000	85,845,733	1,971	0.196%	14,808	385,008
1	Porter	Public Services	800 Series	54	$803,400	398,371	9	0.001%	14,808	799,632
1	Porter	Wild, Forested, Conservation Lands and Public Parks	900 Series	27	$11,000,000	24,200,558	556	0.055%	0	0
			Subtotal for Porter	**2,854**	**$648,072,048**	**$1,778,764,875**	**40,840**	**4.066%**		**11,379,797**

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Wheatfield										
1	Wheatfield	0 Series	0 Series	79	$28,760,880	111,223,702	2,554	0.254%	0	0
1	Wheatfield	Agricultural	100 Series	149	$15,147,800	480,295,394	11,028	1.098%	0	0
1	Wheatfield	Residential - One Family	200 & 210 Codes	5,272	$1,259,720,692	366,303,441	8,410	0.837%	3,787	19,965,064
1	Wheatfield	Residential - Other	All other 200 Series Codes	264	$60,337,150	144,724,789	3,323	0.331%	3,787	999,768
1	Wheatfield	Vacant Land	300 Series	1,345	$56,466,010	277,124,871	6,363	0.633%	0	0
1	Wheatfield	Commercial	400 Series	410	$180,882,890	73,496,654	1,687	0.168%	14,808	6,071,280
1	Wheatfield	Recreation and Entertainment	500 Series	55	$9,015,200	17,783,360	408	0.041%	14,808	814,440
1	Wheatfield	Community Services	600 Series	85	$104,654,700	37,202,945	854	0.085%	14,808	1,258,680
1	Wheatfield	Industrial	700 Series	60	$71,011,380	35,541,054	816	0.081%	14,808	888,480
1	Wheatfield	Public Services	800 Series	78	$134,065,436	62,028,571	1,424	0.142%	14,808	1,155,024
1	Wheatfield	Wild, Forested, Conservation Lands and Public Parks	900 Series	32	$1,155,000	17,686,869	406	0.040%	0	0
Subtotal for Wheatfield				**7,829**	**$1,921,217,138**	**1,623,411,650**	**37,274**	**3.711%**		**31,152,736**
Subtotal for District 1				**73,897**	**$21,323,131,917**	**26,192,166,686**	**601,372**	**60%**		**283,560,331**

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District 2										
Amherst										
2	Amherst	0 Series	0 Series	848	$200,000	182,906,335	4,200	0.418%	0	0
2	Amherst	Agricultural	100 Series	38	$2,076,800	53,487,215	1,228	0.122%	0	0
2	Amherst	Residential - One Family	200 & 210 Codes	30,456	$9,899,484,760	936,870,967	21,511	2.141%	2,832	86,251,392
2	Amherst	Residential - Other	All other 200 Series Codes	1,600	$383,980,000	97,559,488	2,240	0.223%	2,832	4,531,200
2	Amherst	Vacant Land	300 Series	2,134	$191,990,376	606,784,478	13,932	1.387%	0	0
2	Amherst	Commercial	400 Series	1,353	$2,732,411,600	236,877,174	5,439	0.541%	19,345	26,173,785
2	Amherst	Recreation and Entertainment	500 Series	106	$147,704,200	160,418,895	3,683	0.367%	19,345	2,050,570
2	Amherst	Community Services	600 Series	223	$6,969,256,594	213,888,187	4,911	0.489%	19,345	4,313,935
2	Amherst	Industrial	700 Series	35	$42,565,400	5,854,513	134	0.013%	19,345	677,075
2	Amherst	Public Services	800 Series	97	$380,604,336	18,416,028	423	0.042%	19,345	1,876,465
2	Amherst	Wild, Forested, Conservation Lands and Public Parks	900 Series	31	$13,219,800	19,305,300	443	0.044%	0	0
			Subtotal for Amherst	**36,921**	**$20,763,493,866**	**2,532,368,578**	**58,143**	**5.788%**		**125,874,422**
Hamburg										
2	Hamburg	0 Series	0 Series	208	$0	60,756,779	1,395	0.139%	0	0
2	Hamburg	Agricultural	100 Series	40	$3,254,600	25,081,166	576	0.057%	0	0
2	Hamburg	Residential - One Family	200 & 210 Codes	13,336	$2,385,344,000	615,033,217	14,121	1.406%	2,832	37,767,552
2	Hamburg	Residential - Other	All other 200 Series Codes	796	$157,906,000	173,133,927	3,975	0.396%	2,832	2,254,272
2	Hamburg	Vacant Land	300 Series	4,226	$70,026,410	538,008,807	12,353	1.230%	0	0
2	Hamburg	Commercial	400 Series	598	$653,541,300	149,984,753	3,444	0.343%	19,345	11,568,310
2	Hamburg	Recreation and Entertainment	500 Series	58	$20,322,400	53,474,766	1,228	0.122%	19,345	1,122,010
2	Hamburg	Community Services	600 Series	104	$292,422,500	96,967,241	2,226	0.222%	19,345	2,011,880
2	Hamburg	Industrial	700 Series	56	$219,836,932	164,138,902	3,769	0.375%	19,345	1,083,320
2	Hamburg	Public Services	800 Series	116	$119,130,162	38,745,975	890	0.089%	19,345	2,244,020
2	Hamburg	Wild, Forested, Conservation Lands and Public Parks	900 Series	107	$96,178,300	106,321,312	2,441	0.243%	0	0
			Subtotal for Hamburg	**19,645**	**$4,017,962,604**	**2,021,646,845**	**46,417**	**4.621%**		**58,051,364**

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Lancaster										
2	Lancaster	0 Series	0 Series	74	$0	37,298,094	856	0.085%	0	0
2	Lancaster	Agricultural	100 Series	50	$6,473,800	69,883,475	1,605	0.160%	0	0
2	Lancaster	Residential - One Family	200 & 210 Codes	7,534	$2,522,954,510	504,401,966	11,581	1.153%	2,832	21,336,288
2	Lancaster	Residential - Other	All other 200 Series Codes	353	$99,557,600	177,630,246	4,078	0.406%	2,832	999,696
2	Lancaster	Vacant Land	300 Series	2,084	$167,182,766	578,769,582	13,289	1.323%	0	0
2	Lancaster	Commercial	400 Series	299	$515,437,400	83,887,801	1,926	0.192%	19,345	5,784,155
2	Lancaster	Recreation and Entertainment	500 Series	69	$72,257,000	100,470,321	2,307	0.230%	19,345	1,334,805
2	Lancaster	Community Services	600 Series	94	$167,045,400	58,424,773	1,341	0.134%	19,345	1,818,430
2	Lancaster	Industrial	700 Series	87	$99,006,300	130,199,672	2,989	0.298%	19,345	1,683,015
2	Lancaster	Public Services	800 Series	69	$5,869,820	7,659,910	176	0.018%	19,345	1,334,805
2	Lancaster	Wild, Forested, Conservation Lands and Public Parks	900 Series	28	$2,385,600	11,729,916	269	0.027%	0	0
			Subtotal for Lancaster	**10,741**	**$3,658,170,196**	**1,760,355,755**	**40,418**	**4.024%**		**34,291,194**
Niagara										
2	Niagara	0 Series	0 Series	6	$0	129,493	3	0.000%	0	0
2	Niagara	Agricultural	100 Series	32	$1,261,400	26,737,572	614	0.061%	0	0
2	Niagara	Residential - One Family	200 & 210 Codes	2,371	$324,511,080	72,669,077	1,668	0.166%	2,832	6,714,672
2	Niagara	Residential - Other	All other 200 Series Codes	89	$10,378,200	10,077,750	231	0.023%	2,832	252,048
2	Niagara	Vacant Land	300 Series	877	$25,865,600	99,950,555	2,295	0.228%	0	0
2	Niagara	Commercial	400 Series	395	$216,240,924	60,037,920	1,378	0.137%	19,345	7,641,275
2	Niagara	Recreation and Entertainment	500 Series	54	$4,006,000	7,696,866	177	0.018%	19,345	1,044,630
2	Niagara	Community Services	600 Series	59	$120,403,600	51,977,765	1,193	0.119%	19,345	1,141,355
2	Niagara	Industrial	700 Series	46	$21,042,800	36,956,495	849	0.084%	19,345	889,870
2	Niagara	Public Services	800 Series	130	$166,188,906	139,335,585	3,199	0.318%	19,345	2,514,850
2	Niagara	Wild, Forested, Conservation Lands and Public Parks	900 Series	28	$4,787,600	13,569,073	312	0.031%	0	0
			Subtotal for Niagara	**4,087**	**$894,686,110**	**519,138,150**	**11,919**	**1.187%**		**20,198,700**

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Orchard Park										
2	Orchard Park	0 Series	0 Series	223	$0	45,957,510	1,055	0.105%	0	0
2	Orchard Park	Agricultural	100 Series	66	$11,200,200	109,314,756	2,510	0.250%	0	0
2	Orchard Park	Residential - One Family	200 & 210 Codes	7,472	$1,896,213,214	660,099,392	15,156	1.509%	2,832	21,160,704
2	Orchard Park	Residential - Other	All other 200 Series Codes	609	$139,990,210	322,000,941	7,393	0.736%	2,832	1,724,688
2	Orchard Park	Vacant Land	300 Series	1,628	$77,079,664	462,440,440	10,618	1.057%	0	0
2	Orchard Park	Commercial	400 Series	410	$384,231,530	76,913,814	1,766	0.176%	19,345	7,931,450
2	Orchard Park	Recreation and Entertainment	500 Series	64	$443,762,000	147,332,870	3,383	0.337%	19,345	1,238,080
2	Orchard Park	Community Services	600 Series	115	$158,760,236	80,560,857	1,850	0.184%	19,345	2,224,675
2	Orchard Park	Industrial	700 Series	40	$80,606,400	15,581,330	358	0.036%	19,345	773,800
2	Orchard Park	Public Services	800 Series	98	$11,902,360	9,809,328	225	0.022%	19,345	1,895,810
2	Orchard Park	Wild, Forested, Conservation Lands and Public Parks	900 Series	28	$43,000	6,806,118	156	0.016%	0	0
Subtotal for Orchard Park				**10,753**	**$3,203,788,814**	**1,936,817,356**	**44,469**	**4.427%**		**36,949,207**
Village of Alden										
2	V. Alden	0 Series	0 Series	41	$38,400	15,048,763	346	0.034%	0	0
2	V. Alden	Agricultural	100 Series	35	$771,150	40,446,748	929	0.092%	0	0
2	V. Alden	Residential - One Family	200 & 210 Codes	596	$621,607,390	72,952,984	1,675	0.167%	2,832	1,687,872
2	V. Alden	Residential - Other	All other 200 Series Codes	81	$50,373,750	16,412,429	377	0.038%	2,832	229,392
2	V. Alden	Vacant Land	300 Series	109	$37,328,964	74,514,250	1,711	0.170%	0	0
2	V. Alden	Commercial	400 Series	140	$328,394,017	44,086,859	1,012	0.101%	19,345	2,708,300
2	V. Alden	Recreation and Entertainment	500 Series	40	$40,103,750	19,089,882	438	0.044%	19,345	773,800
2	V. Alden	Community Services	600 Series	46	$169,770,500	16,890,990	388	0.039%	19,345	889,870
2	V. Alden	Industrial	700 Series	22	$128,017,140	30,545,611	701	0.070%	19,345	425,590
2	V. Alden	Public Services	800 Series	55	$297,768,776	34,121,230	783	0.078%	19,345	1,063,975
2	V. Alden	Wild, Forested, Conservation Lands and Public Parks	900 Series	28	$18,943,200	12,761,970	293	0.029%	0	0
Subtotal for Alden				**1,193**	**$1,693,117,037**	**376,871,716**	**8,653**	**0.861%**		**7,778,799**

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Village of Angola										
2	V. Angola	0 Series	0 Series	74	$0	13,020,120	299	0.030%	0	0
2	V. Angola	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	V. Angola	Residential - One Family	200 & 210 Codes	582	$72,891,800	23,315,254	535	0.053%	2,832	1,648,224
2	V. Angola	Residential - Other	All other 200 Series Codes	109	$11,462,600	12,164,478	279	0.028%	2,832	308,688
2	V. Angola	Vacant Land	300 Series	173	$2,588,500	33,237,952	763	0.076%	0	0
2	V. Angola	Commercial	400 Series	113	$6,074,400	1,796,998	41	0.004%	19,345	2,185,985
2	V. Angola	Recreation and Entertainment	500 Series	42	$363,400	95,286	2	0.000%	19,345	812,490
2	V. Angola	Community Services	600 Series	46	$60,316,200	9,067,494	208	0.021%	19,345	889,870
2	V. Angola	Industrial	700 Series	22	$6,899,800	1,297,510	30	0.003%	19,345	425,590
2	V. Angola	Public Services	800 Series	60	$693,895	1,709,550	39	0.004%	19,345	1,160,700
2	V. Angola	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Subtotal for Village of Angola				**1,272**	**$161,290,595**	**95,704,642**	**2,197**	**0.219%**		**7,431,547**
Village of Blasdell										
2	V. Blasdell	0 Series	0 Series	48	$0	10,287,562	236	0.024%	0	0
2	V. Blasdell	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	V. Blasdell	Residential - One Family	200 & 210 Codes	563	$64,308,800	8,587,214	197	0.020%	2,832	1,594,416
2	V. Blasdell	Residential - Other	All other 200 Series Codes	239	$30,515,400	3,602,894	83	0.008%	2,832	676,848
2	V. Blasdell	Vacant Land	300 Series	258	$3,131,800	10,342,264	237	0.024%	0	0
2	V. Blasdell	Commercial	400 Series	182	$34,077,800	11,055,792	254	0.025%	19,345	3,520,790
2	V. Blasdell	Recreation and Entertainment	500 Series	42	$376,200	164,942	4	0.000%	19,345	812,490
2	V. Blasdell	Community Services	600 Series	42	$11,817,400	2,236,359	51	0.005%	19,345	812,490
2	V. Blasdell	Industrial	700 Series	28	$14,769,600	9,744,920	224	0.022%	19,345	541,660
2	V. Blasdell	Public Services	800 Series	64	$4,405,800	8,937,044	205	0.020%	19,345	1,238,080
2	V. Blasdell	Wild, Forested, Conservation Lands and Public Parks	900 Series	30	$292,200	306,626	7	0.001%	0	0
Subtotal for Village of Blasdell				**1,521**	**$163,695,000**	**65,265,615**	**1,498**	**0.149%**		**9,196,774**

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Village of East Aurora										
2	V. East Aurora	0 Series	0 Series	17	$0	4,347,039	100	0.010%	0	0
2	V. East Aurora	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	V. East Aurora	Residential - One Family	200 & 210 Codes	1,732	$252,887,050	58,496,336	1,343	0.134%	2,832	4,905,024
2	V. East Aurora	Residential - Other	All other 200 Series Codes	250	$32,674,400	11,892,722	273	0.027%	2,832	708,000
2	V. East Aurora	Vacant Land	300 Series	236	$4,388,000	30,635,759	703	0.070%	0	0
2	V. East Aurora	Commercial	400 Series	301	$124,772,532	14,882,205	342	0.034%	19,345	5,822,845
2	V. East Aurora	Recreation and Entertainment	500 Series	51	$3,923,000	5,161,716	119	0.012%	19,345	986,595
2	V. East Aurora	Community Services	600 Series	69	$60,067,000	13,215,060	303	0.030%	19,345	1,334,805
2	V. East Aurora	Industrial	700 Series	26	$12,882,502	4,007,014	92	0.009%	19,345	502,970
2	V. East Aurora	Public Services	800 Series	61	$14,417,668	2,499,859	57	0.006%	19,345	1,180,045
2	V. East Aurora	Wild, Forested, Conservation Lands and Public Parks	900 Series	30	$4,620,600	41,835,836	961	0.096%	0	0
Subtotal for Village of East Aurora				**2,798**	**$510,632,752**	**186,973,546**	**4,293**	**0.427%**		**15,440,284**

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Village of Lewiston										
2	V. Lewiston	0 Series	0 Series	16	$40,467,600	16,038,104	368	0.037%	0	0
2	V. Lewiston	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	V. Lewiston	Residential - One Family	200 & 210 Codes	885	$180,967,000	18,887,871	434	0.043%	2,832	2,506,320
2	V. Lewiston	Residential - Other	All other 200 Series Codes	93	$18,871,400	1,858,631	43	0.004%	2,832	263,376
2	V. Lewiston	Vacant Land	300 Series	94	$3,795,308	2,774,745	64	0.006%	0	0
2	V. Lewiston	Commercial	400 Series	177	$71,183,400	5,385,830	124	0.012%	19,345	3,424,065
2	V. Lewiston	Recreation and Entertainment	500 Series	46	$2,653,000	724,011	17	0.002%	19,345	889,870
2	V. Lewiston	Community Services	600 Series	46	$21,180,900	1,718,602	39	0.004%	19,345	889,870
2	V. Lewiston	Industrial	700 Series	19	$0	0	0	0.000%	19,345	367,555
2	V. Lewiston	Public Services	800 Series	51	$963,531	174,301	4	0.000%	19,345	986,595
2	V. Lewiston	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Subtotal for Village of Lewiston				**1,478**	**$340,082,139**	**47,562,094**	**1,092**	**0.109%**		**9,327,651**

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Village of Orchard Park										
2	V. Orchard Park	0 Series	0 Series	22	$0	1,883,454	43	0.004%	0	0
2	V. Orchard Park	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	V. Orchard Park	Residential - One Family	200 & 210 Codes	947	$218,774,900	41,193,470	946	0.094%	2,832	2,681,904
2	V. Orchard Park	Residential - Other	All other 200 Series Codes	66	$10,363,600	1,859,181	43	0.004%	2,832	186,912
2	V. Orchard Park	Vacant Land	300 Series	81	$2,571,800	18,890,933	434	0.043%	0	0
2	V. Orchard Park	Commercial	400 Series	181	$67,224,598	8,695,695	200	0.020%	19,345	3,501,445
2	V. Orchard Park	Recreation and Entertainment	500 Series	45	$6,156,000	11,365,985	261	0.026%	19,345	870,525
2	V. Orchard Park	Community Services	600 Series	61	$42,546,800	17,033,006	391	0.039%	19,345	1,180,045
2	V. Orchard Park	Industrial	700 Series	22	$1,661,800	238,205	5	0.001%	19,345	425,590
2	V. Orchard Park	Public Services	800 Series	50	$217,600	78,034	2	0.000%	19,345	967,250
2	V. Orchard Park	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Subtotal for Village of Orchard Park				**1,526**	**$349,517,098**	**101,237,965**	**2,324**	**0.231%**		**9,813,671**

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West Seneca										
2	West Seneca	0 Series	0 Series	638	$0	81,149,778	1,863	0.185%	0	0
2	West Seneca	Agricultural	100 Series	33	$2,774,400	6,160,990	141	0.014%	0	0
2	West Seneca	Residential - One Family	200 & 210 Codes	13,699	$1,680,290,550	430,048,974	9,874	0.983%	2,832	38,795,568
2	West Seneca	Residential - Other	All other 200 Series Codes	1,334	$152,580,100	63,918,484	1,468	0.146%	2,832	3,777,888
2	West Seneca	Vacant Land	300 Series	1,476	$25,272,148	143,657,969	3,298	0.328%	0	0
2	West Seneca	Commercial	400 Series	789	$403,860,260	104,704,376	2,404	0.239%	19,345	15,263,205
2	West Seneca	Recreation and Entertainment	500 Series	74	$8,596,200	25,431,076	584	0.058%	19,345	1,431,530
2	West Seneca	Community Services	600 Series	141	$391,465,500	102,541,739	2,354	0.234%	19,345	2,727,645
2	West Seneca	Industrial	700 Series	40	$21,712,400	8,388,760	193	0.019%	19,345	773,800
2	West Seneca	Public Services	800 Series	205	$23,264,583	44,050,263	1,011	0.101%	19,345	3,965,725
2	West Seneca	Wild, Forested, Conservation Lands and Public Parks	900 Series	29	$20,269,400	18,548,678	426	0.042%	0	0
Subtotal for West Seneca				**18,458**	**$2,730,085,541**	**1,028,601,086**	**23,617**	**2.351%**		**66,735,361**
Youngstown										
2	Youngstown	0 Series	0 Series	7	$12,060,000	41,679,072	957	0.095%	0	0
2	Youngstown	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
2	Youngstown	Residential - One Family	200 & 210 Codes	626	$152,838,400	27,219,730	625	0.062%	2,832	1,772,832
2	Youngstown	Residential - Other	All other 200 Series Codes	38	$6,778,100	1,009,667	23	0.002%	2,832	107,616
2	Youngstown	Vacant Land	300 Series	179	$2,977,380	25,567,086	587	0.058%	0	0
2	Youngstown	Commercial	400 Series	135	$21,285,800	2,351,037	54	0.005%	19,345	2,611,575
2	Youngstown	Recreation and Entertainment	500 Series	52	$3,103,000	1,387,690	32	0.003%	19,345	1,005,940
2	Youngstown	Community Services	600 Series	42	$6,721,900	1,203,917	28	0.003%	19,345	812,490
2	Youngstown	Industrial	700 Series	19	$0	0	0	0.000%	19,345	367,555
2	Youngstown	Public Services	800 Series	52	$1,126,627	50,937	1	0.000%	19,345	1,005,940
2	Youngstown	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Subtotal for Youngstown				**1,201**	**$206,891,207**	**100,469,137**	**2,307**	**0.230%**		**7,683,948**
Subtotal for District 2				**111,594**	**$38,693,412,959**	**10,773,012,483**	**247,348**	**25%**		**408,772,922**

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District 3										
City of Buffalo										
3	C. Buffalo	0 Series	0 Series	949	$0	186,718,218	4,287	0.427%	0	0
3	C. Buffalo	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	C. Buffalo	Residential - One Family	200 & 210 Codes	38,566	$5,102,611,576	356,960,838	8,196	0.816%	2,257	87,043,462
3	C. Buffalo	Residential - Other	All other 200 Series Codes	32,607	$3,285,304,072	278,532,955	6,395	0.637%	2,257	73,593,999
3	C. Buffalo	Vacant Land	300 Series	14,643	$215,708,816	287,649,978	6,604	0.658%	0	0
3	C. Buffalo	Commercial	400 Series	7,104	$4,171,579,254	283,059,892	6,499	0.647%	5,883	41,792,832
3	C. Buffalo	Recreation and Entertainment	500 Series	228	$655,227,370	69,792,015	1,602	0.160%	5,883	1,341,324
3	C. Buffalo	Community Services	600 Series	960	$3,245,086,492	158,164,280	3,631	0.362%	5,883	5,647,680
3	C. Buffalo	Industrial	700 Series	538	$495,793,740	125,211,260	2,875	0.286%	5,883	3,165,054
3	C. Buffalo	Public Services	800 Series	367	$560,362,202	51,411,575	1,180	0.118%	5,883	2,159,061
3	C. Buffalo	Wild, Forested, Conservation Lands and Public Parks	900 Series	154	$303,301,800	113,094,499	2,597	0.259%	0	0
Total for City of Buffalo				**96,141**	**$18,034,975,322**	**1,910,595,509**	**43,867**	**4.367%**		**214,743,412**

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City of Niagara Falls										
3	C. Niagara Falls	0 Series	0 Series	365	$76,800	72,512,155	1,665	0.166%	0	0
3	C. Niagara Falls	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	C. Niagara Falls	Residential - One Family	200 & 210 Codes	13,878	$1,598,220,060	164,827,732	3,784	0.377%	2,257	31,322,646
3	C. Niagara Falls	Residential - Other	All other 200 Series Codes	3,216	$268,458,780	31,119,992	715	0.071%	2,257	7,258,512
3	C. Niagara Falls	Vacant Land	300 Series	3,551	$80,540,472	115,046,556	2,641	0.263%	0	0
3	C. Niagara Falls	Commercial	400 Series	1,801	$652,767,964	81,102,031	1,862	0.185%	5,883	10,595,283
3	C. Niagara Falls	Recreation and Entertainment	500 Series	104	$340,445,900	39,329,931	903	0.090%	5,883	611,832
3	C. Niagara Falls	Community Services	600 Series	217	$363,649,472	45,310,074	1,040	0.104%	5,883	1,276,611
3	C. Niagara Falls	Industrial	700 Series	105	$251,995,776	60,210,469	1,382	0.138%	5,883	617,715
3	C. Niagara Falls	Public Services	800 Series	120	$597,295,882	74,742,591	1,716	0.171%	5,883	705,960
3	C. Niagara Falls	Wild, Forested, Conservation Lands and Public Parks	900 Series	46	$136,900,200	40,597,247	932	0.093%	0	0
Total for City of Niagara Falls				**23,428**	**$4,290,351,306**	**724,798,778**	**16,641**	**1.657%**		**52,388,559**

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City of Tonawanda										
3	C. Tonawanda	0 Series	0 Series	63	$38,400	5,146,958	118	0.012%	0	0
3	C. Tonawanda	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	C. Tonawanda	Residential - One Family	200 & 210 Codes	4,880	$875,135,575	91,584,498	2,103	0.209%	2,257	11,014,160
3	C. Tonawanda	Residential - Other	All other 200 Series Codes	659	$86,132,370	9,339,972	214	0.021%	2,257	1,487,363
3	C. Tonawanda	Vacant Land	300 Series	452	$41,396,174	55,425,066	1,273	0.127%	0	0
3	C. Tonawanda	Commercial	400 Series	381	$386,612,598	49,723,227	1,142	0.114%	5,883	2,241,423
3	C. Tonawanda	Recreation and Entertainment	500 Series	58	$42,732,750	20,557,240	472	0.047%	5,883	341,214
3	C. Tonawanda	Community Services	600 Series	72	$195,883,500	17,165,248	394	0.039%	5,883	423,576
3	C. Tonawanda	Industrial	700 Series	59	$146,759,378	36,725,108	843	0.084%	5,883	347,097
3	C. Tonawanda	Public Services	800 Series	83	$300,407,026	36,862,984	846	0.084%	5,883	488,289
3	C. Tonawanda	Wild, Forested, Conservation Lands and Public Parks	900 Series	40	$20,892,600	14,206,909	326	0.032%	0	0
Total for City of Tonawanda				**6,772**	**$2,095,990,371**	**336,737,209**	**7,731**	**0.770%**		**16,343,122**

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Cheektowaga										
3	Cheektowaga	0 Series	0 Series	343	$0	114,345,056	2,625	0.261%	0	0
3	Cheektowaga	Agricultural	100 Series	26	$91,000	11,631	0	0.000%	0	0
3	Cheektowaga	Residential - One Family	200 & 210 Codes	21,928	$2,571,167,700	367,249,038	8,432	0.839%	2,257	49,491,496
3	Cheektowaga	Residential - Other	All other 200 Series Codes	3,741	$420,855,300	68,498,646	1,573	0.157%	2,257	8,443,437
3	Cheektowaga	Vacant Land	300 Series	1,221	$48,489,490	150,992,999	3,467	0.345%	0	0
3	Cheektowaga	Commercial	400 Series	1,451	$1,306,192,690	182,411,208	4,188	0.417%	5,883	8,536,233
3	Cheektowaga	Recreation and Entertainment	500 Series	70	$22,444,600	37,296,588	856	0.085%	5,883	411,810
3	Cheektowaga	Community Services	600 Series	194	$519,238,746	104,758,203	2,405	0.239%	5,883	1,141,302
3	Cheektowaga	Industrial	700 Series	62	$95,371,746	30,157,476	692	0.069%	5,883	364,746
3	Cheektowaga	Public Services	800 Series	219	$774,605,111	102,956,180	2,364	0.235%	5,883	1,288,377
3	Cheektowaga	Wild, Forested, Conservation Lands and Public Parks	900 Series	45	$14,120,200	34,288,016	787	0.078%	0	0
			Total for Cheektowaga	**29,300**	**$5,772,576,583**	**1,192,965,043**	**27,390**	**2.727%**		**69,677,401**
Lackawanna										
3	Lackawanna	0 Series	0 Series	386	$0	49,621,204	1,139	0.113%	0	0
3	Lackawanna	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	Lackawanna	Residential - One Family	200 & 210 Codes	3,576	$494,051,200	50,553,065	1,161	0.116%	2,257	8,071,032
3	Lackawanna	Residential - Other	All other 200 Series Codes	1,380	$178,327,200	18,890,231	434	0.043%	2,257	3,114,660
3	Lackawanna	Vacant Land	300 Series	836	$16,114,600	37,490,565	861	0.086%	0	0
3	Lackawanna	Commercial	400 Series	629	$159,604,000	22,549,720	518	0.052%	5,883	3,700,407
3	Lackawanna	Recreation and Entertainment	500 Series	62	$14,981,000	17,257,533	396	0.039%	5,883	364,746
3	Lackawanna	Community Services	600 Series	119	$133,906,400	33,740,718	775	0.077%	5,883	700,077
3	Lackawanna	Industrial	700 Series	44	$185,200,798	113,455,354	2,605	0.259%	5,883	258,852
3	Lackawanna	Public Services	800 Series	98	$23,681,871	16,963,521	389	0.039%	5,883	576,534
3	Lackawanna	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
			Total for Lackawanna	**7,181**	**$1,205,867,069**	**360,521,911**	**8,278**	**0.824%**		**16,786,308**

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North Tonawanda										
3	North Tonawanda	0 Series	0 Series	106	$103,736,840	25,459,915	585	0.058%	0	0
3	North Tonawanda	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	North Tonawanda	Residential - One Family	200 & 210 Codes	9,288	$1,651,627,200	202,912,955	4,659	0.464%	2,257	20,963,016
3	North Tonawanda	Residential - Other	All other 200 Series Codes	1,149	$175,528,600	20,625,585	474	0.047%	2,257	2,593,293
3	North Tonawanda	Vacant Land	300 Series	1,299	$22,432,160	92,826,283	2,131	0.212%	0	0
3	North Tonawanda	Commercial	400 Series	838	$283,701,160	43,544,266	1,000	0.100%	5,883	4,929,954
3	North Tonawanda	Recreation and Entertainment	500 Series	97	$36,581,800	54,161,521	1,244	0.124%	5,883	570,651
3	North Tonawanda	Community Services	600 Series	94	$171,421,500	21,566,046	495	0.049%	5,883	553,002
3	North Tonawanda	Industrial	700 Series	93	$85,246,600	25,192,380	578	0.058%	5,883	547,119
3	North Tonawanda	Public Services	800 Series	76	$45,517,178	7,019,562	161	0.016%	5,883	447,108
3	North Tonawanda	Wild, Forested, Conservation Lands and Public Parks	900 Series	31	$6,095,800	9,517,800	219	0.022%	0	0
Total for North Tonawanda				**13,096**	**$2,581,888,838**	**502,826,312**	**11,545**	**1.149%**		**30,604,143**

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Tonawanda										
3	Tonawanda	0 Series	0 Series	305	$0	92,046,524	2,113	0.210%	0	0
3	Tonawanda	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	Tonawanda	Residential - One Family	200 & 210 Codes	23,786	$2,531,776,960	310,780,681	7,136	0.710%	2,257	53,685,002
3	Tonawanda	Residential - Other	All other 200 Series Codes	2,634	$265,818,400	29,796,223	684	0.068%	2,257	5,944,938
3	Tonawanda	Vacant Land	300 Series	591	$31,331,320	92,949,219	2,134	0.212%	0	0
3	Tonawanda	Commercial	400 Series	1,366	$607,264,512	134,190,758	3,081	0.307%	5,883	8,036,178
3	Tonawanda	Recreation and Entertainment	500 Series	76	$31,708,400	12,751,134	293	0.029%	5,883	447,108
3	Tonawanda	Community Services	600 Series	174	$384,334,300	52,088,295	1,196	0.119%	5,883	1,023,642
3	Tonawanda	Industrial	700 Series	120	$217,362,000	71,080,978	1,632	0.162%	5,883	705,960
3	Tonawanda	Public Services	800 Series	186	$1,180,975,142	54,604,554	1,254	0.125%	5,883	1,094,238
3	Tonawanda	Wild, Forested, Conservation Lands and Public Parks	900 Series	48	$45,642,800	71,079,732	1,632	0.162%	0	0
			Total for Tonawanda	**29,311**	**$5,296,213,834**	**921,368,098**	**21,155**	**2.106%**		**70,937,066**
Village of Depew										
3	V. Depew	0 Series	0 Series	84	$0	26,547,636	610	0.061%	0	0
3	V. Depew	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	V. Depew	Residential - One Family	200 & 210 Codes	4,657	$706,036,700	80,629,666	1,851	0.184%	2,257	10,510,849
3	V. Depew	Residential - Other	All other 200 Series Codes	752	$119,367,500	14,311,305	329	0.033%	2,257	1,697,264
3	V. Depew	Vacant Land	300 Series	741	$14,750,090	43,826,018	1,006	0.100%	0	0
3	V. Depew	Commercial	400 Series	497	$262,439,220	43,268,360	993	0.099%	5,883	2,923,851
3	V. Depew	Recreation and Entertainment	500 Series	54	$7,933,200	6,320,037	145	0.014%	5,883	317,682
3	V. Depew	Community Services	600 Series	84	$83,325,100	12,957,894	298	0.030%	5,883	494,172
3	V. Depew	Industrial	700 Series	35	$47,527,000	16,598,760	381	0.038%	5,883	205,905
3	V. Depew	Public Services	800 Series	81	$6,427,824	7,532,787	173	0.017%	5,883	476,523
3	V. Depew	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
			Total for Village of Depew	**7,036**	**$1,247,806,634**	**251,992,462**	**5,786**	**0.576%**		**16,626,246**

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Village of Hamburg										
3	V. Hamburg	0 Series	0 Series	10	$0	1,656,576	38	0.004%	0	0
3	V. Hamburg	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	V. Hamburg	Residential - One Family	200 & 210 Codes	2,864	$479,669,440	64,866,566	1,489	0.148%	2,257	6,464,048
3	V. Hamburg	Residential - Other	All other 200 Series Codes	263	$44,268,000	7,040,028	162	0.016%	2,257	593,591
3	V. Hamburg	Vacant Land	300 Series	353	$6,941,700	33,382,869	766	0.076%	0	0
3	V. Hamburg	Commercial	400 Series	319	$117,026,000	14,045,770	322	0.032%	5,883	1,876,677
3	V. Hamburg	Recreation and Entertainment	500 Series	47	$28,323,600	19,068,398	438	0.044%	5,883	276,501
3	V. Hamburg	Community Services	600 Series	70	$94,944,400	12,599,789	289	0.029%	5,883	411,810
3	V. Hamburg	Industrial	700 Series	32	$15,514,800	4,281,431	98	0.010%	5,883	188,256
3	V. Hamburg	Public Services	800 Series	63	$4,408,400	2,421,504	56	0.006%	5,883	370,629
3	V. Hamburg	Wild, Forested, Conservation Lands and Public Parks	900 Series	39	$3,147,000	17,905,627	411	0.041%	0	0
Total for Village of Hamburg				**4,085**	**$794,243,340**	**177,268,559**	**4,070**	**0.405%**		**10,181,512**
Village of Kenmore										
3	V. Kenmore	0 Series	0 Series	9	$0	156,533	4	0.000%	0	0
3	V. Kenmore	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	V. Kenmore	Residential - One Family	200 & 210 Codes	4,320	$414,052,200	39,937,801	917	0.091%	2,257	9,750,240
3	V. Kenmore	Residential - Other	All other 200 Series Codes	1,176	$120,019,400	10,473,830	240	0.024%	2,257	2,654,232
3	V. Kenmore	Vacant Land	300 Series	58	$1,002,400	470,410	11	0.001%	0	0
3	V. Kenmore	Commercial	400 Series	299	$92,378,800	5,827,683	134	0.013%	5,883	1,759,017
3	V. Kenmore	Recreation and Entertainment	500 Series	45	$6,422,000	2,964,060	68	0.007%	5,883	264,735
3	V. Kenmore	Community Services	600 Series	67	$36,960,800	2,822,492	65	0.006%	5,883	394,161
3	V. Kenmore	Industrial	700 Series	24	$1,751,400	237,585	5	0.001%	5,883	141,192
3	V. Kenmore	Public Services	800 Series	49	$17,000	7,955	0	0.000%	5,883	288,267
3	V. Kenmore	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Total for Village of Kenmore				**6,098**	**$672,604,000**	**62,898,350**	**1,444**	**0.144%**		**15,251,844**

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Village of Lancaster										
3	V. Lancaster	0 Series	0 Series	25	$0	7,691,443	177	0.018%	0	0
3	V. Lancaster	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	V. Lancaster	Residential - One Family	200 & 210 Codes	3,118	$623,956,700	54,389,418	1,249	0.124%	2,257	7,037,326
3	V. Lancaster	Residential - Other	All other 200 Series Codes	538	$109,697,600	12,279,440	282	0.028%	2,257	1,214,266
3	V. Lancaster	Vacant Land	300 Series	421	$12,026,320	30,110,422	691	0.069%	0	0
3	V. Lancaster	Commercial	400 Series	286	$107,721,620	12,416,430	285	0.028%	5,883	1,682,538
3	V. Lancaster	Recreation and Entertainment	500 Series	50	$3,733,200	30,166,952	693	0.069%	5,883	294,150
3	V. Lancaster	Community Services	600 Series	77	$142,359,400	10,545,598	242	0.024%	5,883	452,991
3	V. Lancaster	Industrial	700 Series	41	$30,036,000	5,552,428	127	0.013%	5,883	241,203
3	V. Lancaster	Public Services	800 Series	55	$5,437,398	924,083	21	0.002%	5,883	323,565
3	V. Lancaster	Wild, Forested, Conservation Lands and Public Parks	900 Series	28	$56,000	30,978	1	0.000%	0	0
Total for Village of Lancaster				**4,664**	**$1,035,024,238**	**164,107,193**	**3,768**	**0.375%**		**11,246,039**
Village of Sloan										
3	V. Sloan	0 Series	0 Series	27	$0	11,627,444	267	0.027%	0	0
3	V. Sloan	Agricultural	100 Series	25	$0	0	0	0.000%	0	0
3	V. Sloan	Residential - One Family	200 & 210 Codes	1,054	$86,327,300	12,346,444	283	0.028%	2,257	2,378,878
3	V. Sloan	Residential - Other	All other 200 Series Codes	347	$30,057,200	3,818,909	88	0.009%	2,257	783,179
3	V. Sloan	Vacant Land	300 Series	156	$1,532,606	3,764,391	86	0.009%	0	0
3	V. Sloan	Commercial	400 Series	145	$13,426,700	3,972,859	91	0.009%	5,883	853,035
3	V. Sloan	Recreation and Entertainment	500 Series	42	$329,200	624,056	14	0.001%	5,883	247,086
3	V. Sloan	Community Services	600 Series	38	$3,613,200	1,478,491	34	0.003%	5,883	223,554
3	V. Sloan	Industrial	700 Series	22	$1,177,600	592,640	14	0.001%	5,883	129,426
3	V. Sloan	Public Services	800 Series	55	$909,370	1,679,173	39	0.004%	5,883	323,565
3	V. Sloan	Wild, Forested, Conservation Lands and Public Parks	900 Series	26	$0	0	0	0.000%	0	0
Total for Village of Sloan				**1,937**	**$137,373,176**	**39,904,408**	**916**	**0.091%**		**4,938,723**

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Village of Williamsville										
3	V. Williamsville	0 Series	0 Series	20	$0	1,719,465	39	0.004%	0	0
3	V. Williamsville	Agricultural	100 Series	25	$0	0	0	0%	0	0
3	V. Williamsville	Residential - One Family	200 & 210 Codes	1,484	$414,487,400	34,314,352	788	0.078%	2,257	3,349,388
3	V. Williamsville	Residential - Other	All other 200 Series Codes	216	$57,004,000	4,047,433	93	0.009%	2,257	487,512
3	V. Williamsville	Vacant Land	300 Series	123	$6,052,800	6,914,055	159	0.016%	0	0
3	V. Williamsville	Commercial	400 Series	236	$204,675,600	11,850,805	272	0.027%	5,883	1,388,388
3	V. Williamsville	Recreation and Entertainment	500 Series	45	$16,894,600	15,769,682	362	0.036%	5,883	264,735
3	V. Williamsville	Community Services	600 Series	59	$101,130,300	10,724,664	246	0.025%	5,883	347,097
3	V. Williamsville	Industrial	700 Series	21	$543,000	57,895	1	0.000%	5,883	123,543
3	V. Williamsville	Public Services	800 Series	51	$364,368,600	51,340,272	1,179	0.117%	5,883	300,033
3	V. Williamsville	Wild, Forested, Conservation Lands and Public Parks	900 Series	31	$3,030,600	1,144,063	26	0.003%	0	0
Total for Village of Williamsville				**2,311**	**$1,168,186,900**	**137,882,684**	**3,166**	**0.315%**		**6,260,696**
Total for District 3				**231,360**	**44,333,101,611**	**6,783,866,517**	**155,758**	**16%**		**535,985,071**
Total for all Districts				**416,851**	**104,349,646,487**	**43,749,045,685**		**100%**		**1,228,318,324**