
MEMORANDUM

TO: MAYOR AND CITY COUNCIL
FROM: MARY MARSHALL, BUDGET ANALYST
SUBJECT: STORMWATER UTILITY FEE
DATE: 11/14/2011

Background

The City of Derby faces budget constraints as property values fall while demand for municipal services rises. One of these services is stormwater maintenance. Along with many other services, maintenance of our stormwater drainage system is becoming increasingly important as our City develops, both residentially and non-residentially. Because residents often overlook the benefits of stormwater drainage, public outreach and education are necessary to facilitate future development of the City's stormwater infrastructure.

According to the League of Kansas Municipalities, over the past decade, many cities have created stormwater utilities to maintain and repair existing storm drainage system components (storm sewer pipes, inlets and valves, canals and channels, ditches, curb drainage, etc.) and to fund costs associated with compliance with the Federal Clean Water Act.

Because the stormwater drainage system's challenges are directly attributable to the growing amount of impervious surface, the City should consider its options to address this issue's related costs. Implementing a stormwater utility requires that the City address several potential issues. While stormwater utilities are common across the United States, they remain contentious in some areas.

Historically, the City of Derby has funded stormwater infrastructure and maintenance through the General Fund, which is primarily revenue from property taxes. As property valuation growth has begun to slow, it is important to evaluate other ways of funding critical municipal services. Stormwater utilities have been used in Kansas cities since 1990.

Why a Stormwater Utility?

A stormwater utility is an attempt to spread the costs of maintaining the City's infrastructure across all entities that both contribute to the drainage issues and benefit from the drainage improvements and maintenance. A "user-oriented" method, the stormwater fee, ensures that those benefiting from the service are paying for it.

While many parcel owners do not view stormwater drainage to be a City service, they do benefit from flood prevention and clean water because of the City's stormwater efforts. Traditionally, cities have included drainage infrastructure in their general property tax revenue funds; however, as growth slows in many areas, this has added to the pressure on mill levy rates.

As stormwater drainage requirements increase, the function requires more resources and attention. State and federal guidelines have produced additional maintenance and record-keeping requirements for large cities. Extension of these requirements to smaller cities is looming. Implementing a fee allows the City to fund necessary improvements without displacing other necessary services included in the General Fund. It also positions the City to implement and fund any future environmental requirements.

Implementation Decisions

Implementation of a stormwater utility requires consideration of several key issues. First, the City must determine how to calculate the fees for each property from among the several methods available (flat rates, equivalent residential unit rates, tiered rates, or others). A list of stormwater rates used by other cities is attached in Appendix 1.

The City must also determine whether any entities would be exempt from the fee. A stormwater fee is *not* a tax; however, many exempt entities, such as governmental, educational, religious, and charitable entities, have protested stormwater utility fees in other cities because they view such fees as taxes. Cities must determine their own policies regarding exemptions for tax-exempt entities, and any other classification of entities requesting relief. Other properties, such as those held by low-income families or senior citizens, may also request exemption from stormwater fees.

Finally, the City must determine which costs to include in the stormwater utility fund. Generally, all personnel, commodities, contractual services, and capital expenditures required for maintenance of the stormwater utility would be included in the stormwater utility fund. An estimate of the expenses to be included in a stormwater utility is attached as Appendix 2.

How do other cities calculate stormwater rates?

The stormwater fee structures for nearby and other comparable Kansas cities vary significantly. Some cities include a single flat rate for all properties, others charge residential properties differently than non-residential properties, and some have developed formulas to allocate more of the cost more directly to the larger properties.

Generally, cities focus most of the cost on non-residential properties and keep the residential rates relatively low. Of the cities surveyed, residential rates vary from \$1.00 to \$6.00, with an average around \$2.00. Non-residential rates vary significantly depending on how the fee is calculated.

Flat Rate Structure

The flat rate structure provides simplicity for both customers and city staff; however, it is not the most equitable method of allocating costs. This structure divides parcels into categories based on parcel size or usage. These cities assign a dollar amount to every property.

Arkansas City and Mulvane have flat rates for all customers. Arkansas City requires that non-residential properties (\$6.00) pay twice that of residential properties (\$3.00), and there is no distinction among properties with different sized parcels.

Under some flat rate structures, a standard single-family home would be charged the same amount as a big box retail store. Clearly, the big box retail store generates more stormwater issues than a standard single-family home.

Some cities, such as Dodge City, use a flat rate but allow for an appeals process that requires specific measurement of the impervious surface on the property if the property owner disagrees with the fee. Experts caution cities to focus on “fairness and equity for all ratepayers.”

Equivalent Residential Unit (ERU) Structure

The ERU structure is probably the most equitable; however, it is also the most time consuming to implement and maintain. All properties must be evaluated and measured to establish impervious surface area. Then, the amount of impervious surface area is converted to an ERU value. Generally, an ERU is the equivalent of the amount of impervious surface of an average single-family dwelling.

Overland Park, Lenexa, Topeka and Wichita use the ERU system. Topeka’s residential customers are charged a flat tiered rate based on square footage of the home, and non-residential customers are charged based on how many ERUs are equivalent to their property size. Topeka’s ERU is 2,018 square feet. A non-residential building that is 20,000 square feet is roughly 10 ERUs.

Wichita uses the ERU structure for all of its customers. Residential customers are considered to be equal to one ERU. Wichita’s ERU is 2,139 square feet. Wichita charges a \$2.00 per month fee for all residential units and a \$2.00 per month fee for every 2,139 square feet of impervious surface for all non-residential units. Thus, a retail outlet with 40,000 square feet of impervious surface would be assigned 19 ERUs, while a single-family dwelling is 1 ERU.

Tiered Rate Structure

A tiered structure is a hybrid of ERUs and flat rates. A tiered rate is probably one of the more easily understood by customers and one of the less time consuming processes for city staff. The structure is clearly explained with a table of rates. Establishing the categories and the rates would require research to ensure fair and equitable allocation of cost.

Dodge City, Haysville, Hutchinson, Olathe, and Valley Center use tiered rate structures. They have classified all property based upon size. Generally, residential units are all charged a flat rate, and non-residential units are charged according to the tiered rate schedule.

Generally, cities with tiered rate structures (Olathe) have calculated a rate per 20,000 square feet of lot size. Then, they charge stormwater fees based upon how many increments of 20,000 square feet the property includes. This is similar to ERUs but less time consuming for staff and property owners. By developing tiers of properties, cities are able to limit the administrative time involved in assigning a fee to each property and still maintain an equitable distribution by assigning larger properties larger portions of the fee.

Other Rate Structures

Other cities use various methods to allocate costs, including acreage (Andover) and parking spaces (Garden City). While this method provides little need for additional measurement, the resulting allocation of costs is not as accurate as other rate structures.

Would any entities be exempt from paying the fees?

Because the goal of the stormwater fee is to allocate costs related to stormwater maintenance among those entities responsible for the run-off, all parcel owners are usually subject to the fee. This provides a fair and equitable distribution of the associated costs.

Stormwater fees are not taxes as long as they are directly related to an entity's use of the stormwater drainage system. Regardless of purpose (religious, educational, or governmental), all entities contribute to the need for stormwater drainage maintenance. Thus, a stormwater fee should have very few, if any, exceptions.

Some cities have included various categories for exemptions and/or rebates. Examples of exceptions include:

a. Entities exempt from property tax

In some cities, exempt entities including educational, governmental, and charitable entities have protested stormwater utility fees. Cities must establish their own policy priorities regarding this issue. No legal restrictions exist on imposing utility fees on exempt entities. Assuming that the fee is upheld as a fee rather than a tax, then tax-exempt entities are not fee-exempt by default.

b. Residential parcels owned by senior citizens

Some cities have recognized the effects of utility rates on senior citizens, especially those living on fixed incomes. Some cities have established a rebate program allowing senior citizens to request annual rebate of their stormwater fee. Other cities have created exemptions within their billing system. Most cities do not provide exemptions based on age.

c. Residential parcels owned by low-income residents

The intent of a stormwater utility is not to impose additional burden on struggling families but to accurately allocate the costs of stormwater drainage across all entities contributing to the need for and benefitting from the maintenance of the infrastructure. Thus, some cities have included stormwater fee exemptions and/or rebates for those who demonstrate economic hardship.

Which City of Derby expenses would be considered stormwater-related expenses?

Maintenance of the City's stormwater infrastructure requires City personnel time, supplies, contracted services, and capital expenditures. The City's accounting system would measure stormwater expenses similarly to the wastewater and water funds. A schedule of preliminary expense estimates is attached to this report (Appendix 2).

Staff currently in the Code Enforcement & Stormwater Management Division and the Wastewater Division works on stormwater maintenance issues. The cost for those staff members, as well as any commodities or contractual services necessary for them to carry out their jobs should be included in the stormwater utility. The annual Capital Improvement Plan also includes drainage projects that should be funded through the stormwater utility.

As shown in the summary in Appendix 2, if the stormwater management system were funded by a stormwater utility, the General Fund and Wastewater Fund would no longer absorb the costs of stormwater maintenance. This would provide the City with the opportunity to use these funds for other purposes.

Appendix 3 illustrates the average charges for non-residential properties depending on the rate assigned to residential units. The average charge will rarely be the actual charge for any non-residential property. For example, a big box retail store will be allocated a higher portion of the costs, thus a higher bill, than smaller retail shops.

What would be the “next steps” for successful implementation of a stormwater utility?

New fees are rarely popular. Successful implementation of a stormwater utility fee requires extensive public education and involvement. Terminology is especially important when developing public educational materials. The term “user fee” is highly encouraged, as it helps people understand that they receive a benefit.

Imbedded Stormwater “Fees” within Construction Permits

Rather than implementing a stormwater utility, some cities consider the costs associated with stormwater management when determining the construction fees for new development. While this is not as clean-cut or transparent as a stormwater utility, the method does provide a less politically-

heated method of recovering the costs of stormwater management that are generated by the new development.

On the other hand, newly developed areas are not the only source of stormwater management needs. Existing neighborhoods and non-residential areas also require the attention of stormwater management staff. By including stormwater management expenses in the new construction permits, the costs of maintaining stormwater infrastructure are not accurately allocated among all of the beneficiaries. In fact, this practice may encourage home-buyers to purchase homes in other cities in the Wichita MSA.

Recommendation

In order to achieve the most efficient and understandable fee structure, it is recommended that the City of Derby develop a plan to establish a stormwater utility in 2013 or 2014 and model its fee structure after Olathe's tiered structure (flat fee for residential units and a fee per square foot for non-residential units). Developing such a plan will require significant staff time in 2012 and 2013.

Actual rates should be established after an evaluation of the sizes of the City's non-residential parcels and an analysis of the preliminary costs estimated in Appendix 2. The City should also evaluate how implementation of a stormwater utility may affect the duties of its staff.

Appendix 1. The below rates were obtained through a phone survey of area and comparable cities.

Group 1: Cities with flat rate						
City	Population	ERU size (Sq. Ft.)	Classifications	Monthly Rates	Annual Fee Revenues	Per Capita Annual Fee Revenues
Arkansas City	12,415	N/A	Residential	\$ 3.00	\$ 200,000	\$ 16.11
			Commercial	\$ 6.00		
Mulvane	6,111		All properties	\$ 1.00	\$ 27,000	\$ 4.42
Average Residential Rate				\$ 2.00		
Group 2: Cities with ERU structure						
City	Population	ERU size (Sq. Ft.)	Classifications	Monthly Rates	Annual Revenues	Per Capita Annual Revenues
Lenexa	48,190		Equivalent Dwelling Units	\$ 6.00	\$ 4,200,000	\$ 87.16
Overland Park	173,372	2,485	Residential: One ERU	\$ 2.00	\$ 3,200,000	\$ 18.46
			Commercial: Per ERU	\$ 2.00		
Topeka	127,473	2,018	Residential: Under 1,500 sq ft	\$ 2.75	\$ 2,000,000	\$ 15.69
			Residential: 1,501 to 3,500 sq ft	\$ 4.25		
			Residential: Over 3,500 sq ft	\$ 6.65		
			Apartments/Duplexes	\$ 4.25		
			Non-residential (rate per ERU)	\$ 4.25		
Wichita	382,368	2,139	All Residential	\$ 2.00	\$ 8,500,000	\$ 22.23
			Rate per ERU	\$ 2.00		
Average Residential Rate				\$ 3.94		
Group 3: Cities with tiered rate structure						
City	Population	ERU size (Sq. Ft.)	Classifications	Monthly Rates	Annual Revenues	Per Capita Annual Revenues
El Dorado	13,021		Residential	\$ 1.00	\$ 282,000	\$ 21.66
			Non-Residential (depends on size, max of \$64)	\$ 2.00		
Dodge City	27,340		Per unit (by lot size, if appealed then adjusted for impervious surface)	\$ 1.10	\$ 187,000	\$ 6.84
			up to 20,000 sq. ft.	\$ 2.75		
			up to 40,000 sq. ft.	\$ 3.74		
			up to 60,000 sq. ft.	\$ 7.48		
			up to 80,000 sq. ft.	\$ 11.22		
			Up to 100,000 sq. ft.	\$ 14.96		
			Up to 120,000 sq. ft.	\$ 18.70		
			Up to 140,000 sq. ft.	\$ 22.44		
			Up to 160,000 sq. ft.	\$ 26.18		
			Up to 180,000 sq. ft.	\$ 30.03		
			Up to 200,000 sq. ft.	\$ 37.51		
			Up to 220,000 sq. ft.	\$ 37.51		
			Up to 240,000 sq. ft.	\$ 41.25		
			Up to 260,000 sq. ft.	\$ 44.99		
			Up to 280,000 sq. ft.	\$ 48.73		
			Up to 300,000 sq. ft.	\$ 52.47		
			Up to 320,000 sq. ft.	\$ 56.21		
			Up to 340,000 sq. ft.	\$ 59.95		
			Up to 360,000 sq. ft.	\$ 63.69		
			Up to 380,000 sq. ft.	\$ 67.43		
			Up to 400,000 sq. ft.	\$ 71.28		
			Up to 420,000 sq. ft.	\$ 75.02		
			Up to 440,000 sq. ft.	\$ 78.76		
			Up to 460,000 sq. ft.	\$ 82.50		
			Up to 480,000 sq. ft.	\$ 86.24		
			Up to 500,000 sq. ft.	\$ 89.98		
			Over 500,000 sq. ft.	\$ 93.72		
Haysville	10,826	N/A	Residential	\$ 1.75	\$ 140,000	\$ 12.93
			Non-residential: 0 - 2,500 square feet	\$ 2.20		
			Non-residential: 2,501 - 5,000 square feet	\$ 4.42		

Appendix 1, page 2. The below rates were obtained through a phone survey of area and comparable cities.

			Non-residential: 5,001 -7,500 square feet	\$ 6.63		
			Non-residential: 7,501 -10,000 square feet	\$ 8.85		
			Non-residential: 10,001 - 20,000 square feet	\$ 17.67		
			Non-residential: 20,001 - 30,000 square feet	\$ 26.51		
			Non-residential: 30,001 - 40,000 square feet	\$ 35.35		
			Non-residential: 40,001 - 50,000 square feet	\$ 44.18		
			Non-residential: 50,001 - 75,000 square feet	\$ 66.29		
			Non-residential: 75,001 and greater square feet	\$ 88.39		
Hutchinson	42,080		Residential	\$ 1.00	\$ 270,000	\$ 6.42
			Non-residential: less than 20,000 sq. ft.	\$ 2.00		
			Non-residential: up to 40,000 sq. ft.	\$ 4.00		
			Non-residential: up to 80,000 sq. ft.	\$ 8.00		
			Non-residential: up to 120,000 sq. Ft.	\$ 12.00		
			Non-residential: up to 160,000 sq. Ft.	\$ 16.00		
			Non-residential: up to 200,000 sq. Ft.	\$ 20.00		
			Non-residential: up to 240,000 sq. Ft.	\$ 24.00		
			Non-residential: up to 280,000 sq. Ft.	\$ 28.00		
			Non-residential: up to 320,000 sq. Ft.	\$ 32.00		
			Non-residential: up to 360,000 sq. Ft.	\$ 36.00		
			Non-residential: up to 400,000 sq. Ft.	\$ 40.00		
			Non-residential: up to 440,000 sq. Ft.	\$ 44.00		
			Non-residential: up to 480,000 sq. Ft.	\$ 48.00		
			Non-residential: up to 520,000 sq. Ft.	\$ 52.00		
			Non-residential: up to 560,000 sq. Ft.	\$ 56.00		
			Non-residential: up to 600,000 sq. Ft.	\$ 60.00		
			Non-residential: over 600,000 sq. ft.	\$ 64.00		
Olathe	125,872	N/A	Residential	\$ 5.25	\$ 3,450,000	\$ 27.41
			Commercial: Per 20,000 square feet	\$ 5.25		
Valley Center	6,822	N/A	Class 1: Residential	\$ 1.00	\$ 62,000	\$ 9.09
			Class 2: Non-Res <1,000 sq. ft.	\$ 1.00		
			Class 3: Non-Res 1,001 to 5,000 sq. ft.	\$ 5.00		
			Class 3: Non-Res 5,001 to 100,000 sq. ft.	\$ 10.00		
			Class 3: Non-Res 100,001 and greater sq. ft.	\$ 20.00		
Average Residential Rate				\$ 1.85		
Group 4: Other Methods						
City	Population	ERU size (Sq. Ft.)	Classifications	Monthly Rates	Annual Revenues	Per Capita Annual Revenues
Andover	11,791	N/A	Up to one (1) acre	\$ 2.00	\$ 90,000	\$ 7.63
			1 - 2 acres	\$ 3.00		
			2-5 acres	\$ 5.00		
			Greater than 5 acres	\$ 8.00		
Garden City	26,658		Residential	\$ 1.50	\$ 200,000	\$ 7.50
			Residential/Multi-units	\$ 1.00		
			Commercial: 1-10 parking spaces	\$ 3.00		
			Commercial: 11 - 50 parking spaces	\$ 6.00		
			Commercial: 50-500 parking spaces	\$ 11.25		
			Commercial: 200+ parking spaces	\$ 22.50		
Area Cities with no Stormwater Utility						
City	Population					
Augusta	9,274					
Bel Aire	6,769					
Clearwater	2,481					
Derby	22,158					
Goddard	4,344					
Kechi	1,909					
Maize	3,420					
McPherson	13,155					
Newton	19,132					
Park City	7,297					
Rose Hill	3,931					
Wellington	8,172					

Appendix 2. Preliminary expense estimates and the effects on the General Fund Wastewater Fund

Projected Stormwater Management Costs		2012	2013	2014	2015	2016	Notes
5001	Wages	66,569	67,900	71,295	74,860	78,603	Assumed .02 increase to 2013, .05 to 2014 - 2016 (35% Environmental Compliance Officer, 10% WW)
5013	Lump Sum	-	-	-	-	-	Budgeted in Employee Benefits (GF)
5110	FICA	4,127	4,210	4,420	4,641	4,873	No change in rates
5111	FICA Med	965	985	1,034	1,085	1,140	No change in rates
5120	KPERS	5,152	5,663	6,588	7,666	8,914	Used rates shown above
5122	ICMA-RC	1,955	3,172	3,172	3,172	3,172	Flat contribution (35% Environmental Compliance Officer, 10% WW)
5130	Unemp	226	231	242	255	267	No change in rates
5131	Work Comp	1,550	1,581	1,660	1,743	1,830	No change in rates (35% Environmental Compliance Officer, 10% WW)
5240	Health	18,439	19,545	20,718	21,961	23,279	Assumed .06 increase (35% Environmental Compliance Officer, 10% WW)
5241	Dental	1,434	1,520	1,611	1,708	1,810	Assumed .06 increase (35% Environmental Compliance Officer, 10% WW)
	Total Personnel	100,419	104,807	110,741	117,091	123,889	
6002	Operating Supplies	200	206	212	219	225	Estimate, increased by .03 each year
6110	Fuel	1,200	1,236	1,273	1,311	1,351	Estimate based on current CE & SW Mgmt fuel use
6351	Uniforms	200	200	200	200	200	
	Total Commodities	1,600	1,642	1,685	1,730	1,776	
7010	Printing	-	100	100	100	100	
7030	Travel Expenses	400	400	400	400	400	
7040	Subscriptions	100	100	100	100	100	
7041	Dues & Memberships	150	150	150	150	150	
7050	Meetings & Seminars	600	600	600	600	600	KRWA, KMU
7220	Professional Fees	-	-	-	-	-	
7521	Vehicle Maintenance	400	412	424	437	450	Estimate based on current CE & SW Mgmt maintenance
	Total Contractual	1,650	1,762	1,774	1,787	1,800	
	Emergency Repair & Replace	100,000	100,000	100,000	100,000	100,000	
8100	Capital Projects	220,000	300,000	175,000	225,000	225,000	From 2012-2016 Approved CIP
	Total Capital	320,000	400,000	275,000	325,000	325,000	
	Total Projected Expenditures	423,669	508,211	389,201	445,608	452,464	
	Required Reserve	63,550	76,232	58,380	66,841	67,870	15% because of payroll
	Total Resources Required	487,219	584,443	447,581	512,449	520,334	
	Resources Target	535,831	535,831	535,831	535,831	535,831	Average of first two years
		(48,612)	48,612	(88,250)	(23,381)	(15,496)	
	Projected Fund Balance						
	Prior Year Fund Balance	0	112,162	139,782	286,412	376,635	
	Resources	535,831	535,831	535,831	535,831	535,831	
	Expenditures	(423,669)	(508,211)	(389,201)	(445,608)	(452,464)	
	Fund Balance	112,162	139,782	286,412	376,635	460,001	
	Required Fund Balance	(63,550)	(76,232)	(58,380)	(66,841)	(67,870)	

Appendix 2, page 2. Preliminary expense estimates and the effects on the General Fund Wastewater Fund

		Savings to General Fund					Savings to WW Fund				
		2012	2013	2014	2015	2016	2012	2013	2014	2015	2016
5001	Wages	20,248	20,653	21,685	22,770	23,908	46,321	47,247	49,610	52,090	54,695
5013	Lump Sum										
5110	FICA	1,255	1,280	1,344	1,412	1,482	2,872	2,929	3,076	3,230	3,391
5111	FICA Med	294	299	314	330	347	672	685	719	755	793
5120	KPERS	1,567	1,722	2,004	2,332	2,711	3,585	3,940	4,584	5,334	6,202
5122	ICMA-RC	1,217	1,217	1,217	1,217	1,217	738	1,955	1,955	1,955	1,955
5130	Unemp	69	70	74	77	81	157	161	169	177	186
5131	Work Comp	-	-	-	-	-	1,550	1,581	1,660	1,743	1,830
5240	Health	7,028	7,449	7,896	8,370	8,872	11,411	12,096	12,822	13,591	14,406
5241	Dental	180	191	202	215	227	1,254	1,329	1,409	1,493	1,583
	Total Personnel	31,858	32,883	34,738	36,722	38,846	68,561	71,924	76,003	80,369	85,042
6002	Operating Supplies	200	206	212	219	225	-	-	-	-	-
6110	Fuel	1,200	1,236	1,273	1,311	1,351	-	-	-	-	-
6351	Uniforms	-	-	-	-	-	200	200	200	200	200
	Total Commodities	1,400	1,442	1,485	1,530	1,576	200	200	200	200	200
7010	Printing	-	100	100	100	100	-	-	-	-	-
7030	Travel Expenses	400	400	400	400	400	-	-	-	-	-
7040	Subscriptions	100	100	100	100	100	-	-	-	-	-
7041	Dues & Memberships	150	150	150	150	150	-	-	-	-	-
7050	Meetings & Seminars	300	300	300	300	300	300	300	300	300	300
7220	Professional Fees	-	-	-	-	-	-	-	-	-	-
7521	Vehicle Maintenance	400	412	424	437	450	-	-	-	-	-
	Total Contractual	1,350	1,462	1,474	1,487	1,500	300	300	300	300	300
	Emergency Repair & Replace	-	-	-	-	-	-	-	-	-	-
8100	Capital Projects	220,000	300,000	175,000	225,000	225,000	-	-	-	-	-
	Total Capital	220,000	300,000	175,000	225,000	225,000	-	-	-	-	-
	Total Projected Expenditures	254,608	335,787	212,697	264,739	266,922	69,061	72,424	76,503	80,869	85,542

Appendix 3. Potential billing scenarios assuming a flat rate for residential properties and charging commercial properties based upon their size.

Estimated Billing Amounts						
Flat Monthly Rate per Billing Account	5.22	5.22	5.22	5.22	5.22	Assumes all accounts (residential & commercial) will pay same amount.
\$1/month residential						
Residential (8,200 properties)	98,400	98,400	98,400	98,400	98,400	
Commercial (350 properties)	437,431	437,431	437,431	437,431	437,431	
<i>Average per com. property</i>	<i>104.15</i>	<i>104.15</i>	<i>104.15</i>	<i>104.15</i>	<i>104.15</i>	See Note
\$2/month residential						
Residential (8,200 properties)	196,800	196,800	196,800	196,800	196,800	
Commercial (350 properties)	339,031	339,031	339,031	339,031	339,031	
<i>Average per com. property</i>	<i>80.72</i>	<i>80.72</i>	<i>80.72</i>	<i>80.72</i>	<i>80.72</i>	See Note
\$2.25/month residential						
Residential (8,200 properties)	221,400	221,400	221,400	221,400	221,400	
Commercial (350 properties)	314,431	314,431	314,431	314,431	314,431	
<i>Average per com. property</i>	<i>74.86</i>	<i>74.86</i>	<i>74.86</i>	<i>74.86</i>	<i>74.86</i>	See Note
\$2.50/month residential						
Residential (8,200 properties)	246,000	246,000	246,000	246,000	246,000	
Commercial (350 properties)	289,831	289,831	289,831	289,831	289,831	
<i>Average per com. property</i>	<i>69.01</i>	<i>69.01</i>	<i>69.01</i>	<i>69.01</i>	<i>69.01</i>	See Note
\$2.75/month residential						
Residential (8,200 properties)	270,600	270,600	270,600	270,600	270,600	
Commercial (350 properties)	265,231	265,231	265,231	265,231	265,231	
<i>Average per com. property</i>	<i>63.15</i>	<i>63.15</i>	<i>63.15</i>	<i>63.15</i>	<i>63.15</i>	See Note
\$3/month residential						
Residential (8,200 properties)	295,200	295,200	295,200	295,200	295,200	
Commercial (350 properties)	240,631	240,631	240,631	240,631	240,631	
<i>Average per com. property</i>	<i>57.29</i>	<i>57.29</i>	<i>57.29</i>	<i>57.29</i>	<i>57.29</i>	See Note
Note:	The "average per com. property" line assumes that commercial properties will not be assessed a flat rate, but a rate according to their parcel size (sq. ft., ERU, etc.). The amount shown here is simply the average amount per commercial account. Big box retailers would be charged at higher rates than smaller "Mom & Pop" stores.					