

**PALMER TOWNSHIP
STORMWATER
AUTHORITY
FAQs**



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STORMWATER PROGRAM QUESTIONS

WHAT IS MS4?

MS4 stands for “Municipal Separate Storm Sewer System.” This system includes inlets, basins, man-made channels, culverts, storm drains, and various other stormwater collection and conveyance facilities.

WHY HAS THE IMPORTANCE AND COST OF STORMWATER MANAGEMENT INCREASED?

In the United States, the Environmental Protection Agency (EPA) is charged with regulating stormwater pursuant to the Clean Water Act (CWA). Portions of the stormwater requirements of the federal CWA are administered under the Pennsylvania Department of Environmental Protection’s (PADEP) Municipal Separate Storm Sewer System (MS4) Program. As part of our MS4 permit, we are faced with new unfunded mandates, resulting in new and higher expenses over the five-year permit cycle, requiring water quality improvements. Similarly, based upon the year of installation and system materials used (such as corrugated metal pipes), there is a growing amount of degradation of stormwater infrastructure and increased cost to replace assets. Originally most of the stormwater infrastructure was installed by developers and dedicated to the Township. However, we now need to pay the cost for asset replacement. Higher intensity storms are also impacting the community, causing increased repair costs, and creating a need for additional capacity to be built into the system to protect public health and private property.

WHAT IS AN UNFUNDED MANDATE?

An unfunded mandate is when the state or federal government imposes regulations and restrictions on local levels of government without providing the funds necessary for staffing and/or equipment to comply with the mandate.

WHAT ASPECTS OF STORMWATER MUST BE ADDRESSED TO MEET THESE NEW REGULATIONS?

Palmer Township is required to complete pollutant reduction projects and implement Best Management Practices (BMPs) to reduce pollutant loadings entering our local waterways. Starting in 2022, MS4 permits require adoption of a model stormwater management ordinance. In addition, there are six Minimum Control Measures (MCMs) that the Township is mandated to follow, each containing their own set of BMPs. The six MCMs are listed below with examples of their BMPs:

1. Public Education and Outreach on Stormwater Impacts: Distribute educational materials in the form of a newsletter, flyer, or a website that includes general stormwater educational information.
2. Public Involvement and Participation: Provide opportunities for residents to participate and provide input in the form of public meetings or other events.
3. Illicit Discharge Detection and Elimination: Develop and implement a plan for the detection, elimination, and prevention of illicit discharges to the storm sewer system.
4. Construction Site Stormwater Runoff Control: Develop, implement, and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land. Palmer Township currently partners with the Northampton County Conservation District to monitor active construction projects.
5. Post-Construction Stormwater Management (PCSM): Develop, implement, and enforce a program to address discharges or post construction stormwater runoff from new development and redevelopment areas. Applicable controls could be the use of structural BMPs such as vegetated swales and detention basins.

6. Pollution Prevention and Good Housekeeping: Develop and implement an operations and maintenance (O&M) program that includes training components and plans to reduce polluted runoff from municipal operations.

WHAT IS THE DIFFERENCE BETWEEN PALMER'S STORMWATER MANAGEMENT PROGRAM AND OTHER GROUPS LIKE BUSHKILL STREAM CONSERVANCY?

Palmer Township is mandated by the state and federal government to comply with the Municipal Separate Storm Sewer (MS4) Program. There are strict rules and regulations that must be followed and reported annually to avoid paying fines to PA DEP and EPA. Palmer Township works with these other organizations to meet common goals.

WHAT ARE STRUCTURAL STORMWATER BMPS?

While some BMPs--or Best Management Practices--are administrative or operational in nature, such as public education or street sweeping, others are structural and are used to improve water quality by reducing contaminants that enter local waterways. Structural BMPs are designed to reduce stormwater volume, peak flows, and nonpoint source pollution through evapotranspiration, infiltration, detention, and filtration. Examples of structural BMPs include stream bank stabilization, detention basin retrofits, rain gardens, bio swales, permeable pavement, street sweeping, and installation of community rain gardens.

HOW DO I AFFECT STORMWATER RUNOFF?

Stormwater management involves managing rainwater that is not absorbed by our lawns and gardens. Impervious surface on your property impacts the volume, rate, and pollutant load of stormwater runoff that will be managed by Palmer Township Stormwater Authority (PTSA). Also, household tasks such as car washing and use of fertilizer can impact stormwater quality.

WHAT IS IMPERVIOUS AREA?

Impervious area (IA) is a surface that prevents the infiltration of water into the ground. Impervious surfaces (or areas) shall include, but are not limited to, roofs, additional indoor living spaces, patios, garages, storage sheds and similar structures, streets, sidewalks and vehicle and pedestrian areas that are gravel and crushed stone. Any surface area proposed to initially be gravel, crushed stone or paving is considered impervious, unless designed as an infiltration BMP.

WHAT IS AN ILLICIT DISCHARGE AND HOW DO I REPORT ONE?

The Environmental Protection Agency (EPA) defines illicit discharges as "any discharge to the storm sewer system that is not composed entirely of stormwater." Illicit discharges can be from car wash wastewater, spills from roadway accidents, failed septic systems, and improper disposal of household toxins and detergents. These substances can either enter our waterways through direct connections or indirect connections. It is always good to monitor the stormwater inlets near your property. If you see someone dumping, or any other concerning stormwater flows, please do not investigate and call the Palmer Township Office at 610-253-7191 ext. 1130. After hours, please call the Northampton County Non-Emergency phone number at 610-759-2200.

STORMWATER UTILITY FEE QUESTIONS

HOW DID YOU COME UP WITH THE COST OF THE STORMWATER UTILITY FEE?

Palmer Township worked with the community to evaluate the stormwater program needs, including meeting with a Stakeholder Advisory Committee (SAC). Importance of stormwater management, level of service, stormwater regulations, and condition of stormwater assets were all considered. In addition, known problems, scheduled stormwater improvements, ongoing administrative and operational expenses, and projects necessary to comply with regulatory requirements were used to project future stormwater management costs. These stormwater program costs were divided by the impervious area estimates in the Township to come up with the Stormwater Utility Fee.

HOW WAS IMPERVIOUS AREA ESTIMATED FOR MY PROPERTY?

Palmer Township worked with stormwater engineer HRG to complete an aerial orthophotography of the entire Township to calculate the impervious area of each parcel from above. The orthophotography was converted for use in Geographic Information Systems (GIS) software. In GIS, the impervious area features were identified and plotted throughout the Township. County GIS data showing parcel boundaries was overlaid with the impervious area dataset to determine the estimated amount of impervious area per property. Included in this assessment may be roof area, pavement, and decks or patios.

IS EVERYONE IN THE TOWNSHIP CHARGED THE STORMWATER UTILITY FEE?

The fee will be paid by all property owners who own developed property in Palmer Township whose property has impervious surfaces over 300 square feet. Tax exempt properties will be charged because it is a utility fee and not a property tax. Property taxes are based on the assessed value of the property whereas the stormwater utility fee is based on impervious area. Tax-exempt properties will be charged a stormwater utility fee similar to other utilities including electric, water, and sewer.

WHY NOT JUST INCLUDE THE STORMWATER PROGRAM COSTS IN OUR PROPERTY TAXES?

The stormwater fee is based on the amount of impervious area rather than assessed property value, so the cost is assigned to the properties that have a greater impact on stormwater runoff. There is no correlation between assessed property values and the amount of impervious surface on a given property. This makes it inequitable to base the stormwater fee on the assessed value of the properties. An advantage of a fee-based system is that credits can be offered to property owners. PTSA has developed a credit policy to provide fee reductions to property owners. A credit cannot be offered on a tax-based system.

HOW MUCH IS THE STORMWATER UTILITY FEE?

The amount will differ depending on how much impervious area is on a property. The fee structure is shown below.

	Impervious Area	Monthly Fee (Billed Quarterly)
Tier 0	<300 sf	No Fee Assessed
1	300 – 1999 sf	\$9.64
2	2000 – 3999 sf	\$20.00
3	4000 – 5999 sf	\$32.68
4	6000+ sf	Monthly fee of \$6.94 per 1000 sf of IA rounded to nearest 100 sf

WHERE DOES THE MONEY COLLECTED FROM THE STORMWATER UTILITY FEE GO?

All stormwater revenue will be placed into a dedicated fund used only for the PTSA's stormwater program and program related projects.

CAN I APPEAL HOW MUCH I'M BEING CHARGED?

If you believe you are being incorrectly charged, you may submit an appeal to have this information reviewed. The Credit and Appeals Manual provides information on how to submit an appeal. Further information and applications can be found on the PTSA page of the Township website.

IS THERE A WAY TO REDUCE MY FEE?

Yes. The stormwater utility fee will allow for credits. Credits are a percent reduction in the stormwater utility fee for offsetting utility program costs. The Credit and Appeals Manual provides further information. The credits include:

- Peak Rate Control / Volume Control Structural BMP Credit
- Education Credit
- Stormwater Partnership Credit

IF MY ROOF DOWNSPOUTS DRAIN TO MY YARD, CAN I RECEIVE A CREDIT?

Credits are applied based on stormwater controls on your property related to rate, volume, and water quality. Some examples are rain gardens, infiltration trenches, and detention or retention basins. The Credit and Appeals Manual provides further information on what constitutes a credit. You can apply for Credits using the forms included on the Township website within the Manual.

THERE IS NO STORM SEWER NEAR MY PROPERTY/I HAVE NEVER EXPERIENCED FLOODING. WHY SHOULD I PAY A FEE?

Even if your property has never flooded and/or there are no nearby storm sewers, the stormwater that flows off your property must be managed by PTSA. The fee will also help cover other services such as stormwater system maintenance and infrastructure updates, as well as MS4 permit compliance.

HOW WILL PROPERTIES BE BILLED?

A stormwater bill will be issued quarterly included as a line item on the current Sewer and Trash bills most property owners receive. If you do not currently receive a utility bill, a new stormwater bill will be issued.

CAN THE TOWNSHIP RECEIVE GRANTS RATHER THAN ASSESSING MORE FEES?

The Township can apply for grants, but project funding is not guaranteed and is very competitive. Waiting for notification of award determinations, agreements, and following regulations can make the grant process lengthy. The Township would also still need to provide matching funds for grant awards. Instituting a stormwater utility fee will put the Township in a better position to receive low interest loans and grants in the future for stormwater projects.

HOW IS UNOCCUPIED PROPERTY TREATED?

If the unoccupied property contains impervious area greater than the minimum (vacant residential structures, empty commercial/industrial buildings, driveway, etc. greater than 300 square feet), it will be charged. These properties continue to generate stormwater runoff the same as an occupied property.

WHY SHOULD I PAY FOR RAIN FALLING ON MY PROPERTY?

Property owners are not being charged for rain falling on their property nor is the fee tied to the quantity of rainfall. Instead, the charges are correlated to stormwater runoff associated with impervious area on the property. As rain falls on impervious surface, it collects pollutants, such as oil or pesticides. Proper stormwater management is vital to mitigating flooding. Through the implementation of the fee, a dedicated funding source will be in place to help manage stormwater.

WHO DECIDES ON PRIORITY PROJECTS?

The five PTSA members are developing a ranking system to determine priority levels for current proposed and future stormwater projects in the Township. Priority determinations may include threat to public health and safety, overall project cost, and amount of private/public property damage.

HOW DO I REPORT MY STORMWATER CONCERNS?

Property owners will be able to submit stormwater concerns using an online form on the PTSA page of the Township website (palmertwp.com). Concerns can also be communicated to the Township by phone or email. Phone number: (610)-871-7871 and email is: stormwater@palmertwp.com