



Follow-Up from Transportation-Related Municipal Separate Storm Sewer Systems (MS4s) Questionnaire Teleconference

October 13, 2010

Clarification on Questions B1 and B3

B.1 First Row

In question B-1, the first row of the table asks for the department/agency's total operating budget for the years 2005-2009. The information EPA is asking for here is the department/agency's total annual expenditures for ordinary operations, maintenance, administrative activities, and any ongoing debt service (periodic payments of interest and principal) on capital projects paid through some borrowing mechanism. EPA is not interested in the amount of money spent each year on these capital projects, only the interest and principal paid on such debt. EPA does anticipate that there may be some small or unanticipated capital expenses that are paid for directly from ordinary operations revenue and are not debt financed. These capital outlays that are directly paid for should be included in your annual budget expenditures.

B-1 Second Row

In the second row of B-1, EPA is requesting the same information as in the first row. However, in this case, EPA is asking for postconstruction stormwater management related expenses only. This includes all postconstruction stormwater management activities performed irrespective of permit requirements (e.g., you would include costs if you conduct street sweeping outside of the area covered under your MS4 permit). You should not include measures to control stormwater on active construction sites, such as installing or maintaining erosion and sediment controls. As with the first row in B-1, EPA does anticipate that there may be some small or unanticipated postconstruction stormwater management related capital expenses that are paid for directly from ordinary operations revenue and are not debt financed. These capital outlays that are directly paid for should be included in your responses in the second row of B-1.

With respect to debt service in the second row of B-1, include only the portion of your debt service that is for capital projects specifically intended to address a stormwater management concern, such as a stormwater retrofit project. EPA is making a distinction here between capital projects that are devoted specifically to stormwater management and a standard transportation project, such as the widening of an existing road. EPA understands that all transportation projects are designed and implemented to manage the stormwater generated on roads and other impervious surfaces during storm events, and so have some stormwater related costs. EPA will be addressing the stormwater management component of transportation projects as part of its engineering analysis. If you want to provide EPA with an estimate of the costs associated with the stormwater management component of transportation projects, please provide it separately in the comment field directly below question B-3 titled "Additional comments on Annual Stormwater Costs."

B-3:

In question B-3, EPA requests information on the composition of the annual stormwater-related expenses provided in B-1. EPA does assume that if a respondent is able to provide stormwater related costs in B-1, then the respondent should be able to provide some breakout of those cost components in B-3. Note that the activity descriptions in the first column of B-3 are meant to provide respondents with a general level of specificity that EPA was looking to get for this question and the descriptions were not meant to be rigid categories. Simply ignore activity categories that do not apply to your department/agency's stormwater costs. If an activity category does apply to your department/agency, but the activity description does not quite match the activities you are providing costs for, then please use the far right column of the table to provide us with a more accurate description. If your department/agency performs an activity not listed, please use the "other" rows.

The third item of question B-3 ("Capital Expenses") requests information on stormwater related capital outlays. The response for this account item should follow the same concept as described for question B-1.

EPA is not requesting that any respondent generate new data that they currently do not have. If there are stormwater related costs that you know that your department/agency incurs but that you are unable to even provide an estimate for as part of B-1, please at least provide a description of what those costs are in the comment field below question B-3 titled "Additional Comments on Annual Stormwater Costs."

If you have additional questions, please e-mail Todd Doley at the following address:
doley.todd@epa.gov.

Important: On a final note, please enter the following in the comment field titled "Additional Comments on Annual Stormwater Costs" directly below question B-3: Responses reflect clarification on B-1 and B-3.