

JIM KONISH

GRU & Tax Collector: Why Pay More?

Hello,

Thank you for providing information regarding the stormwater assessment and retention credit calculations for our properties.

I am requesting additional information regarding the methodology used to calculate the stormwater assessment and the 15% retention credits assigned to the properties identified by tax parcel numbers 14121-000-000, 14122-000-000, 14125-000-000, and 14120-000-000.

Specifically, I would appreciate receiving the following:

1. The GIS measurements and calculations used to determine the currently assigned 5.2 ERUs.
2. The measured impervious area, semi-impervious area, and adjusted impervious area attributed to each parcel.
3. The calculations used to determine the 15% retention credit, including the retention volume and Standard Retention Volume used by the City.
4. Any assumptions or engineering considerations regarding the underground exfiltration system and the various man-made and natural stormwater management facilities serving the properties.

I would also like the City to consider whether these parcels should be classified and assessed as a single "General Property" pursuant to Section 3.04(C) of the Stormwater Initial Assessment Resolution. The Resolution expressly states that a "General Property may have many individually owned Parcels with distinct ad valorem property tax identification numbers" that function as a development with shared infrastructure and common stormwater facilities.

Our parcels share an integrated stormwater management system, including underground retention infrastructure, exfiltration areas, drainage patterns, and stormwater collection features that were designed to function together as a unified system. The retention facilities are centrally located to serve the development as a whole rather than any single parcel. In addition, the development does not discharge any stormwater into the City's stormwater system and does not receive a special benefit from the City's local stormwater system.

I further note that the current assessment appears to allocate charges among individual parcels despite the existence of a shared stormwater management system. Because the ordinance contemplates calculating ERUs for an entire General Property before allocating assessments

among individual parcels, I respectfully request that the City review whether the assessment should first be calculated at the development level and then apportioned among the parcels.

Using the City's previously stated 6.1 ERUs for the property, the Standard Retention Volume appears to be approximately 9,236 cubic feet, based on the following calculation:

$6.1 \text{ ERUs} \times 2,300 \text{ sq. ft.} \times 7.9 \text{ in.} \div 12 = \text{approximately } 9,236 \text{ cubic feet.}$

Based on that figure, our stormwater basins, which have a documented volume of approximately 3,413 cubic feet, would appear to provide approximately a 36.7% retention credit on their own. To be clear, the 3,413-cubic-foot volume does not represent the full scope of our property's stormwater detention and retention system; rather, it provides one indication of our property's existing capacity to manage stormwater on-site.

In addition to the basins, our property includes French drains, drainage beds along the sides of the building, and rain barriers designed to prevent stormwater from flowing beneath the building. These systems function together as an integrated stormwater management system that directs stormwater toward the basins and into filter-cloth and rock drainfield areas located on our property.

Finally, if there are engineering standards, inspection requirements, or documentation requirements that would allow additional retention credit for the underground exfiltration system or future stormwater management upgrades, I would appreciate receiving that information. This would allow me to evaluate whether additional stormwater storage or retention improvements would be necessary to qualify for increased retention credits.

Thank you for your time and assistance. I look forward to reviewing the underlying calculations and discussing whether the properties should be treated as a single General Property for stormwater assessment purposes.

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