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February 22, 2016

Honorable Matthew Brown Chairman, Board of Directors District of Columbia Water and Sewer Authority 5000 Overlook Avenue, S.W. Washington, D.C. 20032

RE: DC Water System Availability Fee

Dear Chairperson Brown,

As you know, the District of Columbia Building Industry Association ("DCBIA") represents over 450 organizations and thousands of real estate professionals in the District of Columbia Metropolitan area. Our members are professionals in all aspects of real estate development. DCBIA is also well versed in municipality management with respect to its effect on a jurisdiction's economic development trajectory. DCBIA is also a staunch advocate for improving the District's water supply and treatment and adopting best practices on wastewater and stormwater conveyance that we have witnessed DC Water undertake over the past several years.

DCBIA respectfully submits for the record its opposition to Rule Number 21-112: DC Water - Establish System Availability Fee ("SAF"). SAF, another label for a development fee, will increase the cost of living for residents and increase the cost of doing business for commercial tenants in the District. The proposed rulemaking also does not take into consideration the existing investments development projects make toward our water and sewer infrastructure. Furthermore, the Committee's analysis of fee structures in surrounding jurisdictions does not justify the proposed fees nor does it consider other cost-attributing factors. Finally, the approaching effective date for the proposed SAF would create unintended consequences for exempt projects and impede numerous projects that have finalized their financing yet remain in the early stages of design.

-more-

William B. Alsup III Charles K. Barber The George Washington University Neal B. Bien Bien/Paul Ventures, Inc. Robert H. Braunohler Property Group Partners Gregory W. Fazakerley CG Investments, Inc. Steven A. Grigg Republic Properties Corporation Albert R. "Butch Hopkins, Jr. Anacostia Economic Development

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The Bozzuto Group

lake Stroman

Robert Taylor

Gigi Webb

Robert W Ward

Commercial Development

sler Architects

Metropolitan Washington Airports Authority (MWAA)

Washington DC Economic Partnership Steve Strazzella

Amy Rice Hines Amy Rifkind Arnold & Porter Keith Sellars

New fees on District residents and businesses

Department of Consumer and Regulatory Affairs ("DCRA") Construction Applicants, in addition to federal facilities, will be assessed fees for new water and sewer connections and renovation or redevelopment projects for existing connections to the District's potable water and sanitary sewer systems based on the SAF meter size. Although the fees would be assessed on new projects, the fees would ultimately be reflected in District residents and commercial tenants' rent, maintenance and other costs. Equally troubling, the new fees would not be absorbed by DC Water's Maryland and Virginia customers because there are no DC Water-owned or maintained lines in surrounding jurisdictions. District rate payers are already responsible for Impervious Surface Charges, which are twice that would otherwise be imposed, despite the fact that half of the impervious surfaces in DC are streets, sidewalks, and other public space areas. The proposed fees, in conjunction with continued increases in impervious surface rates and other charges, would inevitably increase the District's cost of living and place it in an economic disadvantage position in comparison to surrounding jurisdictions.

Recommendation: Explore alternate funding mechanisms that are shared equally by all three jurisdictions.

Meter Size

Neighboring jurisdictions size a meter based on demand, and size the water service based on velocity. DC Water requires that the lateral and meter must be the same size. As result, meters are within the high side of the range allowed. Moreover, monthly meter fees are considerable alone and development projects are often faced with older, larger meters that may have more capacity than the projects' demand for service. Because SAF differences between sizes can be significant, right sizing the meter is in everyone's best interest.

Recommendation: Consider flexibility and "necking down" at the meter as an acceptable practice.

Charitable Organizations and Affordable Housing

Development projects that are associated with charitable organizations or contain an affordable housing component face tremendous hurdles in coming to fruition. For charitable organizations, many financial institutions are reluctant to support projects where there are limited parties that can guarantee repayment. Projects that include affordable housing units face similar barriers without government assistance in the form of tax incentives or other assurances. Therefore, the proposed SAF will add yet another challenge such altruistic projects face in the development process.

Recommendation: Exempt projects that include charitable organizations and affordable housing components in their master plan from the proposed SAF. Alternatively, distribute directly targeted revenue among ratepayers in monthly statements.

Existing Investments Triggered by Development

District projects often improve public infrastructure to ensure that the site's existing service lines can accommodate new developments or renovations. For example, projects that

require zoning changes involve off-site improvements or direct monetary contributions to utilities, including to DC Water and its available system capacity. In addition, District "by-right" developments require water and sewer replacement investments even if they do not experience or create capacity issues. Conversely, by-right projects in surrounding jurisdictions only require off-site water and sewer replacements if there are known capacity issues or in the event that water and sewer facilities are not contiguous to the property. The proposed fees simply do not take into consideration other system replacement investments that are regularly associated with development projects.

Recommendation: 1) Establish a standardized table for allowances (per linear foot) for new infrastructure. 2) Incorporate water and sewer investments made by development projects through zoning requests and other agreements toward SAF credits. If a project provides an investment in water and sewer infrastructure that is the equivalent or higher than the SAF, waive the SAF, accordingly.

Small Projects

The proposed rulemaking may create an even more substantial burden on smaller projects. For example, an 8-unit building could require a 2" line, which would cost \$38,000. Smaller projects would simply be unable to absorb such a cost. Equally important, these projects do not place the same volume of pressure on the existing or future common systems because of their minimal proportional usage. As a result, utilities and other regulatory bodies create necessary exemptions from city-wide policies, such as Inclusionary Zoning and the Green Building Act, for small projects.

Recommendation: Establish a minimum square footage requirement to trigger the SAF, which would exempt small projects that are unable to afford the proposed fees.

Other Jurisdictions

According to DCBIA's research, surrounding jurisdictions do not offer substantially lower rates to justify the proposed SAFs. Arlington's fee structure, for example, appears to be significantly lower for a multi-family building and or commercial development than the District's. Although Fairfax and the Washington Suburban Sanitary Commission ("WSSC") have slightly higher fee structures for multi-family accounts, these jurisdictions do not require the same investments mentioned previously that District projects make toward water and sewer infrastructure. Despite the DC Retail Water and Sewer Rates Committee's intention, the proposed rulemaking does not bring the District's fee structure in line with surrounding jurisdictions.

A. Arlington County

4" meter service connection charge = \$21,200.00, plus a \$2,000.00 charge for a meter installation and a water availability fee of \$85 per Drainage Fixture Unit (DFU). For a 254-residential unit development, the water availability fee would be \$21,336.00. The total cost of installing water service to a new 254-unit development would be \$44,536.00.

B. Fairfax County

4" meter = \$131,700.00, or for a multi-family = \$3,160.00 per unit. For a 254-residential unit development, the fee would be \$802,640.00.

C. WSSC

WSSC calculates its Residential System Development Charges (SDC) based on individual apartment unit costs. For Non-Residential Development, it calculates SDC based on individual fixture unit costs, including toilets, sinks and water heaters. There is also no requirement to replace existing infrastructure unless the existing service mains are inadequate for the proposed development and an upgrade in size is necessary to service the new project. Finally, WSSC does not charge for meters; it employs a unit count fee structure.

For a 254-residential unit with each unit having 2 toilets:

i. SDC: \$775,716.00 (\$3,054 per residential unit)

ii. Service Connection Fee to the site: \$3,600.00 (\$1800 for water connection + \$1800 for sewer connection)

iii. Total Connection & SDC: \$779,316.00

Effective Date

According to the proposed rulemaking, DC Water would only grant an exemption from the new fee structure for Applicants that have paid their review fees and submitted plans prior to the proposed effective date, April 1, 2016. Specifically, exempted projects would still need to 1) pay DC Water's Engineering Review fees; 2) submit comprehensive plans to comply with DC Water's Engineering Review; 3) and receive a Certificate of Approval within one year of the proposed rulemaking's effective date. These requirements are stringent and do not take into consideration a host of unforeseen circumstances that development projects face on a habitual basis that interfere with their timelines to meet steps two and three.

There are also projects currently underway that have made critical financing decisions yet have not completed their respective design processes. The design process can take several months or longer, regardless of the project's size or anticipated completion date. While this is an inconvenience for some projects, it can be a deal killer for others. DC Water should consider a longer phase in period or several phase in periods to lessen the impact to the development community. A phased in approach would create conformity by also exempting Applicants that have started the development process yet could not meet the requirements under the proposed rulemaking.

Recommendation: Reschedule proposed rulemaking's effective date to April 1, 2018.

Conclusion

DCBIA is committed to working with DC Water's Board of Directors on identifying a funding mechanism to address the impact of development projects on the District's water and sewer system; however, the proposed SAF rates are not the answer. Working with our regional

¹ Copies of WSSC's Residential and Non-Residential SDC are attached for the record.

partners, DCBIA strongly believes that we can identify an alternative proposal that provides equity among all rate payers. The District has witnessed one of the most promising economic renaissances in the nation with our existing fee structures despite turbulent economic times. We should not increase fees without thoroughly considering its impact in conjunction with existing and other proposed costs on development projects.

Thank you again for the opportunity to provide comments on the proposed rulemaking. If you have any questions related to our position or seek further information on alternative funding sources, please do not hesitate to contact me at (202) 966-8665.

Sincerely,

Lisa María Mallory, CEO

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cc: DC Water Board of Directors

Rachna Butani Alan J. Roth Ellen O. Boardman Obiora "Bo" Menkiti Nicholas A. Majett Bradley Frome Timothy L. Firestine Elisabeth Feldt

James Patteson

Linda R. Manley, Secretary Ana Harvey Rev. Kendrick Curry Howard C. Gibbs Adam Ortiz Shirley Branch Bonnie Kirkland David W. Lake Sarah Motsh

Copies of WSSC's Residential and Non-Residential SDC

Residential SYSTEM DEVELOPMENT CHARGE Rates Effective July 1, 1999

Fixture Code Revisions Effective May 1, 2007

Code	Fixture Description	Water Supply Fixture Unit Value	SDC Water Charge		Drainage Fixture Unit Value		er Combinge Charg		
R0	Bathtub (Residential)	3.00	\$	264	1.60	\$	184	\$	448
4B	BFP - Testable	-	\$	-	-	\$	-	\$	-
4C	BFP - Non-Testable	-	\$	-	-	\$	-	\$	-
R1	Bidet	1.00	\$	88	1.40	\$	161	\$	249
RW	Clothes Washer Standpipe/Box	2.00	\$	176	1.60	\$	184	\$	360
RR	Clothes Washer (water only)	2.00	\$	176				\$	176
R2	Dishwasher (Residential)	1.00	\$	88	1.60	\$	184	\$	272
68	Ejector Pump	-	\$	-	-	\$	-	\$	-
F3	Faucet - Pot Filler	1.00	\$	88	-	\$	-	\$	88
R5	Floor Drain (primed)	-	\$	-	-	\$	-	\$	-
GP	Grinder Pump - Unknown Type	-	\$	-	-	\$	-	\$	-
R7	Hose Bibb	3.00	\$	264	-	\$	-	\$	264
RP	Hose Bibb on Well	-	\$	-	-	\$	-	\$	-
R9	Humidifier (Residential type)	-	\$	-	-	\$	-	\$	-
RA	Ice Maker (Residential type)	-	\$	-	-	\$	-	\$	-
RC	Instant Hot	-	\$	-	-	\$	-	\$	-
RH	Lawn Sprinkler - 3/4" Water Supply	4.00	\$	352	-	\$	-	\$	352
RI	Lawn Sprinkler -1" & Larger Water Supply	10.00	\$	880	-	\$	-	\$	880
MO	Modular Unit	-	\$	-	-	\$	-	\$	-
RJ	Pool Fill	4.00	\$	352	-	\$	_	\$	352
RK	Sauna (with water) / Steamer	0.50	\$	44	-	\$	-	\$	44
RL	Shower Stall	2.00	\$	176	1.40	\$	161	\$	337
RM	Sink (Bar)	1.00	\$	88	1.40	\$	161	\$	249
RN	Sink (Kitchen)	2.00	\$	176	1.60	\$	184	\$	360
RF	Sink (Laundry Tray)	2.00	\$	176	1.60	\$	184	\$	360
RG	Sink (Lavatory)	1.00	\$	88	0.90	\$	104	\$	192
RB	Water Closet (Flush Tank 1.6 gpf)	2.00	\$	176	2.00	\$	230	\$	406
WS	Water Conditioner	-	\$	-	-	\$	-	\$	-
60	Water Heater - Not Gas	-	\$	-	-	\$	-	\$	-
8F	Gas - Boiler (under 200K)	-	\$	-	-	\$	-	\$	-
XB	Gas - Boiler (200K+)	-	\$	-	-	\$	-	\$	-
VP	Gas - Cooking Equipment	-	\$	-	-	\$	-	\$	-
87	Gas - Dryer	-	\$	-	-	\$	-	\$	-
VQ	Gas - Generator	-	\$	-	-	\$	-	\$	-
VN	Gas - Heater (Construction)	-	\$	-	-	\$	-	\$	-
8T	Gas - Heater (Decorative)	-	\$	-	-	\$	-	\$	-
6A	Gas - Heater (Pool)	-	\$	-	-	\$	-	\$	-
8N	Gas - Heating Equipment	-	\$	-	-	\$	-	\$	-
85	Gas - Lab Burner	-	\$	-	-	\$	-	\$	-
8G	Gas - Other	-	\$	-	-	\$	-	\$	-

Permits must accurately reflect EVERY fixture code to be installed for <u>ALL</u> residential and apartment units, and rennovation projects. <u>Permits that do not reflect 100% fixture accuracy will FAIL inspection.</u>

Modifications to the permit must be made and "updated" in the Permits system prior to scheduling an inspection.

Residential SYSTEM DEVELOPMENT CHARGE

Rates Effective July 1, 1999

Fixture Code Revisions Effe	ective May 1	, 2007
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Code	Fixture Description	Water Supply Fixture Unit Value	SDC Water Charge	Drainage Fixture Unit Value	SDC Sewer Charge	SDC Combined Charge
XX	Gas - Paint Booth	1	\$ -	-	\$ -	\$ -
9D	Gas - Test	1	\$ -	-	\$ -	\$ -
8D	Gas - Water Heater (under 200K)	-	\$ -	-	\$ -	\$ -
XD	Gas - Water Heater (200K+)	-	\$ -	-	\$ -	\$ -

		SDC	SDC		
Dwelling Unit Type	Water	Sewer	Combined		
	Charge	Charge	Charge		
Apartment (per unit)	\$ 896	\$ 1,140	\$ 2,036		
1 - 2 Toilets / Residential Dwelling Unit	\$ 1,344	\$ 1,710	\$ 3,054		
3 - 4 Toilets / Residential Dwelling Unit	\$ 2,240	\$ 2,850	\$ 5,090		
5 Toilets / Residential Dwelling Unit	\$ 3,135	\$ 3,991	\$ 7,126		
6 or More Toilets / Residential Dwelling Unit	Per Fixture Basis				

Permits must accurately reflect **EVERY** fixture code to be installed for <u>ALL</u> residential and apartment units, and rennovation projects. <u>Permits that do not reflect 100% fixture accuracy will FAIL inspection.</u>

Modifications to the permit must be made and "updated" in the Permits system prior to scheduling an inspection.

Fixture unit values shown in this chart shall be used *only* for calculating System Development Charges. For system design and hydraulic calculations, use the fixture unit values shown in the International model codes.

For fixtures not listed, the Code Official shall use the value of a fixture with similar flow characteristics.

Non-Residential SYSTEM DEVELOPMENT CHARGE

Rates Effective July 1, 1999

Fixture Code Revisions Effective May 1, 2007

Code	Fixture Description	Water Supply Fixture Unit Value	DC Water Charge	Drainage Fixture Unit Value	SDC Sewer Charge		SDC Combined Charge	
7N	Backwash Surge Tank (2" max. drain)	-	\$ -	3.00	\$ 345	9	\$ 345	
79	Baptistery	10.00	\$ 880	3.00	\$ 345	9	\$ 1,225	
01	Bathtub	10.00	\$ 880	2.00	\$ 230	9,	\$ 1,110	
	BFP - Testable	-	\$ -	-	\$ -	•	5 -	
	BFP - Non-Testable	-	\$ -	-	\$ -	. 9	\$ -	
	Bidet	1.00	\$ 88	2.00	\$ 230	_		
7M	Booster Pump	-	\$ -	-	\$ -	9	•	
96	Clothes Washer Standpipe/Box	3.00	\$ 264	3.00	\$ 345	_	•	
9W	Clothes Washer (Water Only)	3.00	\$ 264	1	\$ -	,	\$ 264	
4V	Cooling Tower (Water Supply 1" & smaller)	10.00	\$ 880	-	\$ -	,	\$ 880	
4U	Cooling Tower (Water Supply 1-1/4" & larger)	75.00	\$ 6,600	-	\$ -	,	\$ 6,600	
4W	Dental Cuspidor to OSD	0.25	\$ 22	-	\$ -	9,	\$ 22	
4X	Dental Cuspidor w/drain	0.25	\$ 22	0.50	\$ 58		•	
	Dip Well	0.25	\$ 22	-	\$ -	,	\$ 22	
03	Dishwasher (Residential Type)	1.00	\$ 88	2.00	\$ 230	9,	\$ 318	
44	Dishwasher (Commercial)	2.00	\$ 176	4.00	\$ 460	9	\$ 636	
7F	Disposal (Commercial 2")	4.00	\$ 352	3.00	\$ 345	,	\$ 697	
71	Disposal (Commercial 3")	4.00	\$ 352	5.00	\$ 575	,	\$ 927	
DS	Drain to Storm	-	\$ -	-	\$ -	,	\$ -	
18	Drinking Fountain	0.25	\$ 22	0.50	\$ 58			
	Ejector Pump	-	\$ -	-	\$ -		\$ -	
	Emergency - Eye Wash	0.25	\$ 22	-	\$ -		\$ 22	
1A	Emergency - Shower	3.75	\$ 330	-	\$ -	9		
F1	Faucet - Commercial Kitchen	4.00	\$ 352	-	\$ -	•	\$ 352	
	Faucet - Hand Sink	1.00	\$ 88	-	\$ -		•	
	Faucet - Pot Filler	1.00	\$ 88	-	\$ -	_		
	Faucet - Service Sink	2.00	\$ 176	-	\$ -	_		
	Fire Hydrant	-	\$ -	-	\$ -		•	
	Fire Sprinkler Connection	-	\$ -	-	\$ -	,		
	Floor Drain (primed)	-	\$ -	-	\$ -	,		
	Floor Drain (not primed)	-	\$ -	-	\$ -	,		
	Flush Valve	5.00	\$ 440	-	\$ -			
	Gas - Boiler (under 200K)	-	\$ -	-	\$ -	,		
	Gas - Boiler (200K+)	-	\$ -	-	\$ -			
	Gas - Cooking Equipment (All)	-	\$ -	-	\$ -		\$ -	
	Gas - Dryer	-	\$ -	-	\$ -		\$ -	
	Gas - Generator	-	\$ -	-	\$ -	_		
VN	Gas - Heater (Construction)	-	\$ -	-	\$ -	1 7		
8T	Gas - Heater (Decorative)	-	\$ -	-	\$ -	_		
6A	Gas - Heater (Pool)	-	\$ -	-	\$ -	_		
8N	Gas - Heating Equipment	-	\$ -	-	\$ -			
85	Gas - Lab Burner	-	\$ -	-	\$ -			
	Gas - Other	-	\$ -	-	\$ -		\$ -	
	Gas - Paint Booth	-	\$ -	-	\$ -			
8U	Gas - Sub-meter	-	\$ -	-	\$ -	•	Б —	

Non-Residential SYSTEM DEVELOPMENT CHARGE

Rates Effective July 1, 1999

Fixture Code Revisions Effective May 1, 2007

Code	Fixture Description	Water Supply Fixture Unit Value	SDC Water Charge		Drainage Fixture Unit Value	SDC Sewer Charge	SDC ombined Charge
9D	Gas - Test	-	\$	-	-	\$ -	\$ -
8D	Gas - Water Heater (under 200K)	-	\$	-	-	\$ -	\$ -
XD	Gas - Water Heater (200K+)	-	\$	-	-	\$ -	\$ -
GP	Grinder Pump - Unknown Type	-	\$	-	-	\$ -	\$ -
	Grease Interceptor	-	\$	-	-	\$ -	\$ -
	Grease Recovery Device	-	\$	-	-	\$ -	\$ -
	Grease Trap	-	\$	-	-	\$ -	\$ -
	Hose Bibb (wall hydrant, etc.)	3.00	\$	264	-	\$ -	\$ 264
RP	Hose Bibb on Well	-	\$	-	-	\$ -	\$ -
67	Humidifier (Residential Type)	-	\$	-	-	\$	\$ -
75	Ice Maker (Residential Type)	0.25	\$	22	•	\$ -	\$ 22
04	Instant Hot	-	\$	•	•	\$ -	\$ -
BG	Irrigation System w/3/4" supply	10.00	\$	880	•	\$ -	\$ 880
BH	Irrigation System w/1" supply	75.00	\$	6,600	ı	\$ -	\$ 6,600
	Irrigation System w/1-1/4" supply	160.00	\$	14,080	-	\$ -	\$ 14,080
BJ	Irrigation System w/1-1/2" supply	270.00	\$	23,760	-	\$ -	\$ 23,760
BK	Irrigation System w/2" supply	550.00	\$	48,400	-	\$ -	\$ 48,400
M1	Mechanical Supply Closed Loop	-	\$		-	\$ -	\$ -
MO	Modular Building	-	\$		-	\$ -	\$ -
65	Oil/Sand Interceptor	-	\$		-	\$ -	\$ -
MH	On-Site Manhole	-	\$		-	\$ -	\$ -
DG	Receptor Drain 1-1/4"	-	\$	-	1.00	\$ 115	\$ 115
DH	Receptor Drain 1-1/2"	-	\$		2.00	\$ 230	\$ 230
50	Receptor Drain 2"	-	\$		3.00	\$ 345	\$ 345
51	Receptor Drain 3"	-	\$		5.00	\$ 575	\$ 575
52	Receptor Drain 4"	-	\$		6.00	\$ 690	\$ 690
54	Receptor Drain 6"	-	\$		6.00	\$ 690	\$ 690
FC	Pool Fill (1/2" supply)	4.00	\$	352	-	\$ -	\$ 352
FD	Pool Fill (3/4" supply)	10.00	\$	880	-	\$ -	\$ 880
	Pool Fill (1" supply)	75.00	\$	6,600	-	\$ -	\$ 6,600
FF	Pool Fill (1-1/4" supply)	160.00	\$	14,080	-	\$ -	\$ 14,080
	Pool Fill (1-1/2" supply)	270.00	\$	23,760	-	\$ -	\$ 23,760
	Pool Fill (2" supply)	550.00	\$	48,400	-	\$ -	\$ 48,400
5E	Pre-Treatment Unit	-	\$	-		\$ -	\$ -
97	Private Meter	-	\$	-	-	\$ -	\$ -
RU	Repiping	-	\$	-	-	\$ -	\$ -
	Roof Drain	-	\$	-	-	\$ -	\$ -
AC	Shell Permit Sewer Rough-In	-	\$	-	-	\$ -	\$ -
	Shell Permit Water Rough-In	-	\$	-	-	\$ -	\$ -
	Shower Stall (1-1/4" drain)	5.00	\$	440	1.00	\$ 115	\$ 555
	Shower Stall (1-1/2" drain)	5.00	\$	440	2.00	\$ 230	\$ 670
	Shower Stall (2" drain)	5.00	\$	440	3.00	\$ 345	\$ 785
	Shower, per head, gang/column	5.00	\$	440		\$ -	\$ 440
	Sink - Clinical (Flush Valve)	5.00	\$	440	6.00	\$ 690	\$ 1,130
	Sink - Compartment (one faucet)	4.00	\$	352		\$ -	\$ 352

Non-Residential SYSTEM DEVELOPMENT CHARGE

Rates Effective July 1, 1999

Fixture Code Revisions Effective May 1, 2007

Code	Fixture Description	Water Supply Fixture Unit Value	DC Water Charge	Drainage Fixture Unit Value	SDC Sewer Charge		Combined	
	Sink - Compartment (two faucets)	8.00	\$ 704	-	\$	-	\$	704
	Sink - Hand	1.00	\$ 88	1.00	\$	115	\$	203
21	Sink - 1-1/2" Drain	2.00	\$ 176	2.00	\$	230	\$	406
WA	Sink - Laundry Tray (with clothes washer)	6.00	\$ 528	3.00	\$	345	\$	873
47	Sink - Laundry Tray (without clothes washer)	3.00	\$ 264	2.00	\$	230	\$	494
20	Sink - Lavatory - Common	1.00	\$ 88	1.00	\$	115	\$	203
JS	Sink - Mop or Service (1-1/2" trap)	2.00	\$ 176	2.00	\$	230	\$	406
JT	Sink - Mop or Service (2" trap)	2.00	\$ 176	3.00	\$	345	\$	521
JU	Sink - Mop or Service (3" trap)	2.00	\$ 176	5.00	\$	575	\$	751
WO	Sink - Wash Fountain	4.00	\$ 352	3.00	\$	345	\$	697
YO	Spray - Hand Held	4.00	\$ 352	ı	\$	-	\$	352
12	Urinal	3.00	\$ 264	4.00	\$	460	\$	724
U2	Water Closet - Flush Tank (Non-public)	2.00	\$ 176	4.00	\$	460	\$	636
U4	Water Closet - Flush Tank (Public)	2.00	\$ 176	6.00	\$	690	\$	866
U3	Water Closet - Flush Valve (Non-public)	5.00	\$ 440	4.00	\$	460	\$	900
U5	Water Closet - Flush Valve (Public)	5.00	\$ 440	6.00	\$	690	\$	1,130
WS	Water Conditioner	-	\$ •	ı	\$	•	\$	-
WT	Water Dispenser	0.50	\$ 44	-	\$	-	\$	44
60	Water Heater - Not Gas	-	\$ -	-	\$	-	\$	-
WR	Water Supply Only 3/8"	2.00	\$ 176	-	\$	-	\$	176
YE	Water Supply Only 1/2"	4.00	\$ 352	-	\$	-	\$	352
YD	Water Supply Only 3/4"	10.00	\$ 880	-	\$	-	\$	880
YC	Water Supply Only 1"	75.00	\$ 6,600	-	\$	-	\$	6,600
YB	Water Supply Only 1-1/4"	160.00	\$ 14,080	-	\$	-	\$	14,080
YA	Water Supply Only 1-1/2"	270.00	\$ 23,760	-	\$	-	\$	23,760
WZ	Water Supply Only 2"	550.00	\$ 48,400	-	\$	-	\$	48,400
	Water Supply Only 3"	1,500.00	\$ 132,000	-	\$	-	\$	132,000
WX	Water Supply Only 4"	3,000.00	\$ 264,000	-	\$	-	\$	264,000
WW	Whirlpool, Therapeutic (water only)	10.00	\$ 880		\$	-	\$	880

Permits must accurately reflect **EVERY** fixture code to be installed for <u>ALL</u> non-residential, residential, apartment units, and rennovation projects. <u>Permits that do not reflect 100% fixture accuracy will FAIL inspection</u>.

Modifications to the permit must be made and "updated" in the Permits system prior to scheduling an inspection.

Fixture unit values shown in this chart shall be used**only** for calculating System Development Charges. For system design and hydraulic calculations, use the fixture unit values shown in the International model codes.

For fixtures not listed, the Code Official shall use the value of a fixture with similar flow characteristics.