

# Capacity Assurance Banking Credit Program

**Leveraging DeKalb's Wastewater Capacity Improvements Program to Encourage Community Enhancements and Economic Development**

Case 1:10-cv-04039-SDG Document 83 Filed 09/22/21 Page 46 of 90

### APPENDIX D TO CONSENT DECREE MODIFICATION

#### Capacity Assurance Program

Submitted to  
U.S. Environmental Protection Agency  
Georgia Environmental Protection Division

Submitted by  
Department of Watershed  
Management  
DeKalb County, Georgia



Case No. 1:10 cv 4039-SDG

Prepared by  
CDPMT

September 2020

- Modified Consent Decree (9/22/2021) established a Capacity Assurance Program (CAP)
- CAP defines requirements for identifying adequate wastewater system capacity
- Granted authority to DeKalb County to establish a Capacity Assurance Banking Credit Program (CABCP)
- Allows for capacity credits to be awarded after sewer system rehabilitation work is completed using a defined ratio
- Removal of extraneous flow (infiltration/inflow) through rehab allows capacity credits to be earned to approve new connections

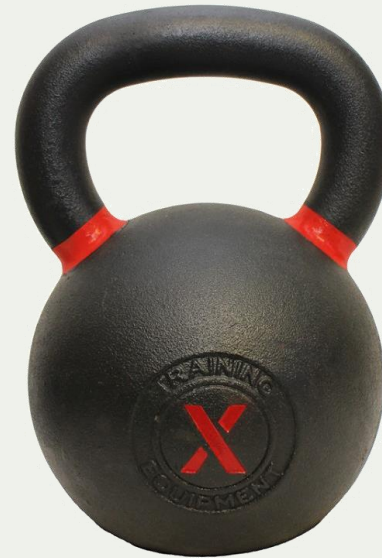
# Capacity Assurance Program

Banking Credit Program: Allow for Growth / Protect Community and Environment



- Capacity Credits Allow Moderated Growth based on Progress of System Rehab
- Program Approved by EPA and GA EPD – Proven Track Record of Success by Other Utilities under Consent Decrees
- Program is Protective of Community and the Environment:
  - Requires 3 to 4 gallons of I/I to be removed in order to allow 1 gallon of flow to be added from new connection
  - Will maintain minimum credit balance of 10,000 gpd for each Model Area

**System Rehab**



**3or 4 Gallons Per Day  
Removed**

**Allows  
Approval for:**

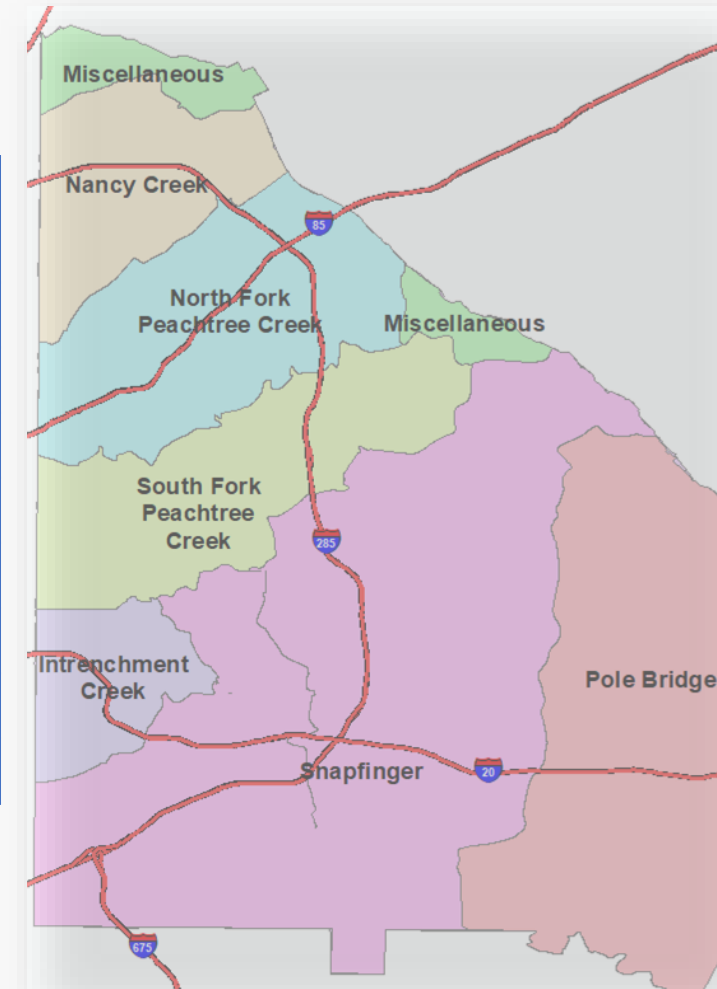
**1 Capacity  
Credit**



**1 Gallons Per Day Added**

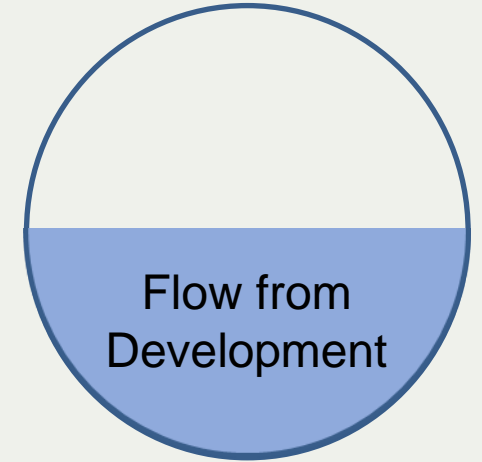
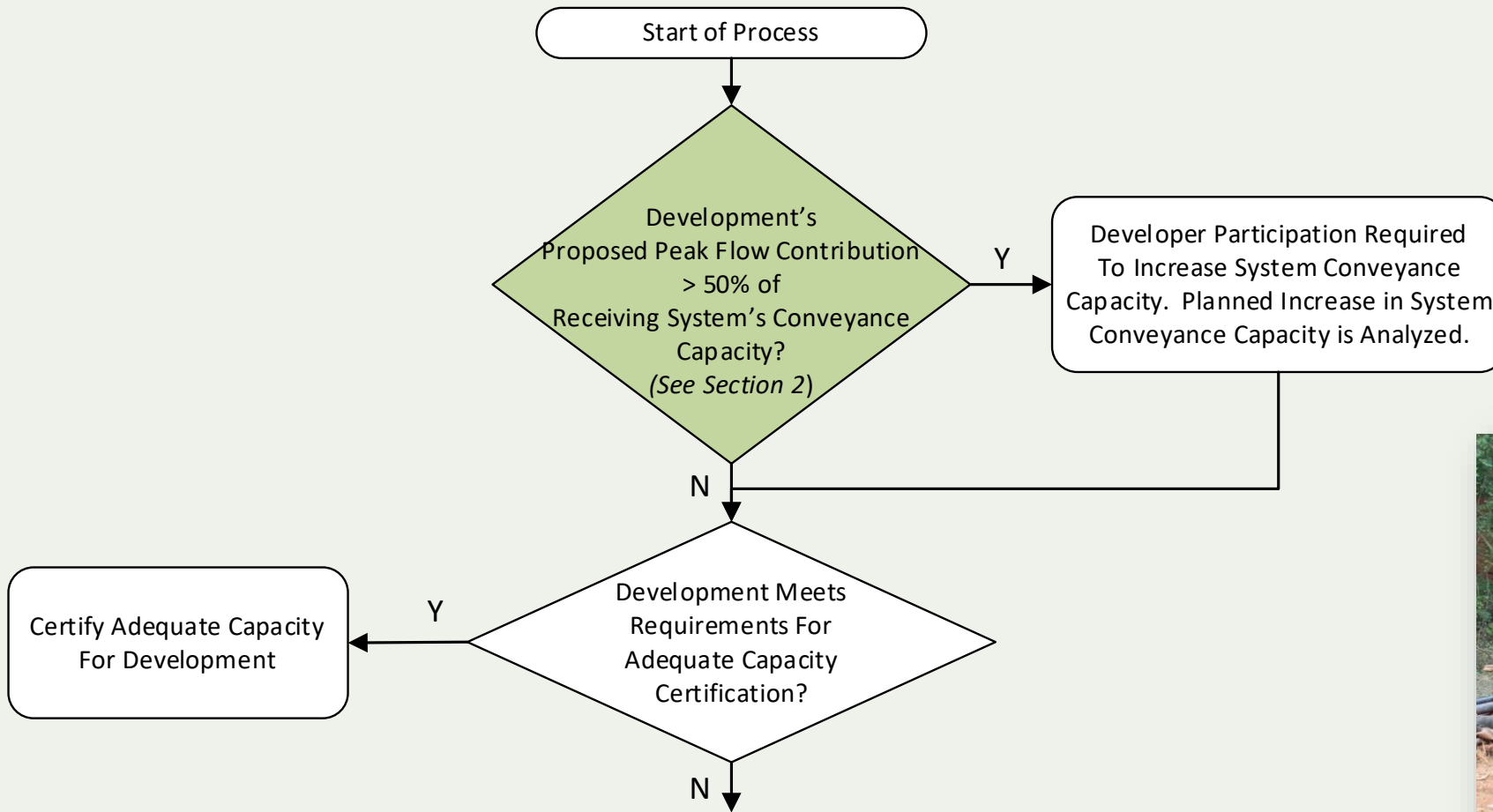
### Completed Rehabilitation Since April 29, 2019

| Model Area                 | Pipes Upsized Feet (Miles) | Pipes Rehabilitated Feet (Miles) | Cleanout Caps Replaced Count | Vented Lids Replaced Count | Estimated Infiltration/Inflow Removed (gpd) |
|----------------------------|----------------------------|----------------------------------|------------------------------|----------------------------|---|
| Intrenchment Creek         | 0                          | 8,140 (1.54)                     | 42                           | 75                         | 316,435                                     |
| Miscellaneous Model        | 0                          | 0                                | 12                           | 0                          | 3,000                                       |
| Nancy Creek                | 7,655 (1.45)               | 18,059 (3.42)                    | 144                          | 0                          | 277,623                                     |
| North Fork Peachtree Creek | 704 (0.13)                 | 198,523 (37.6)                   | 378                          | 2                          | 3,023,417                                   |
| Pole Bridge                | 11,319 (2.14)              | 3,545 (0.67)                     | 265                          | 0                          | 87,163                                      |
| Snapfinger                 | 4,117 (0.78)               | 213,817 (40.50)                  | 723                          | 115                        | 3,642,465                                   |
| South Fork Peachtree Creek | 1,608 (0.30)               | 29,906 (5.66)                    | 44                           | 3                          | 1,062,952                                   |
| <b>Totals =&gt;</b>        | <b>25,403 (4.81)</b>       | <b>471,990 (89.39)</b>           | <b>1,608</b>                 | <b>195</b>                 | <b>8,413,055</b>                            |



# DeKalb's Capacity Assurance Banking Credit Program

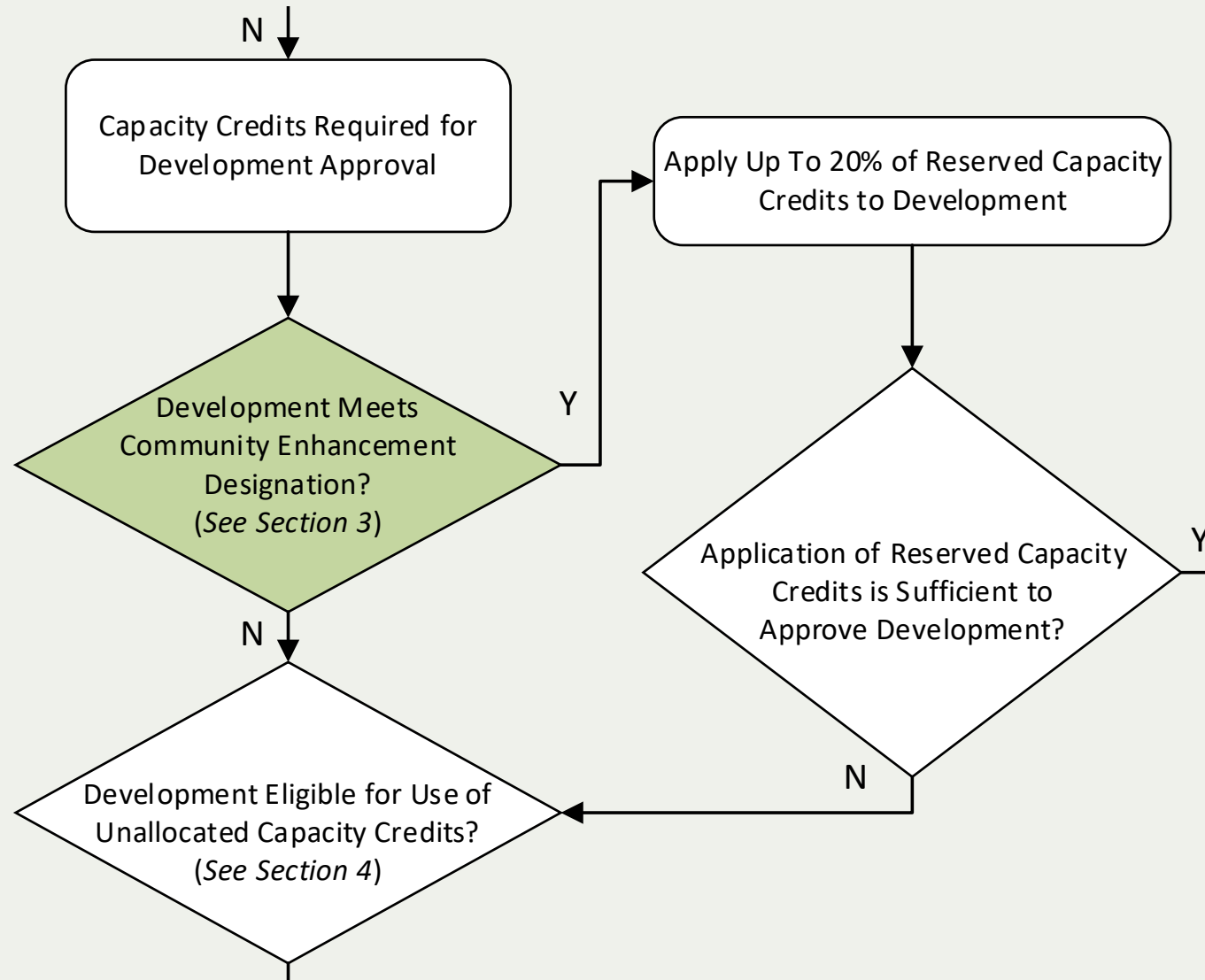
## Capacity Approval Process Flow Chart





# DeKalb's Capacity Assurance Banking Credit Program

## Developer Capacity Approval Process Flow Chart



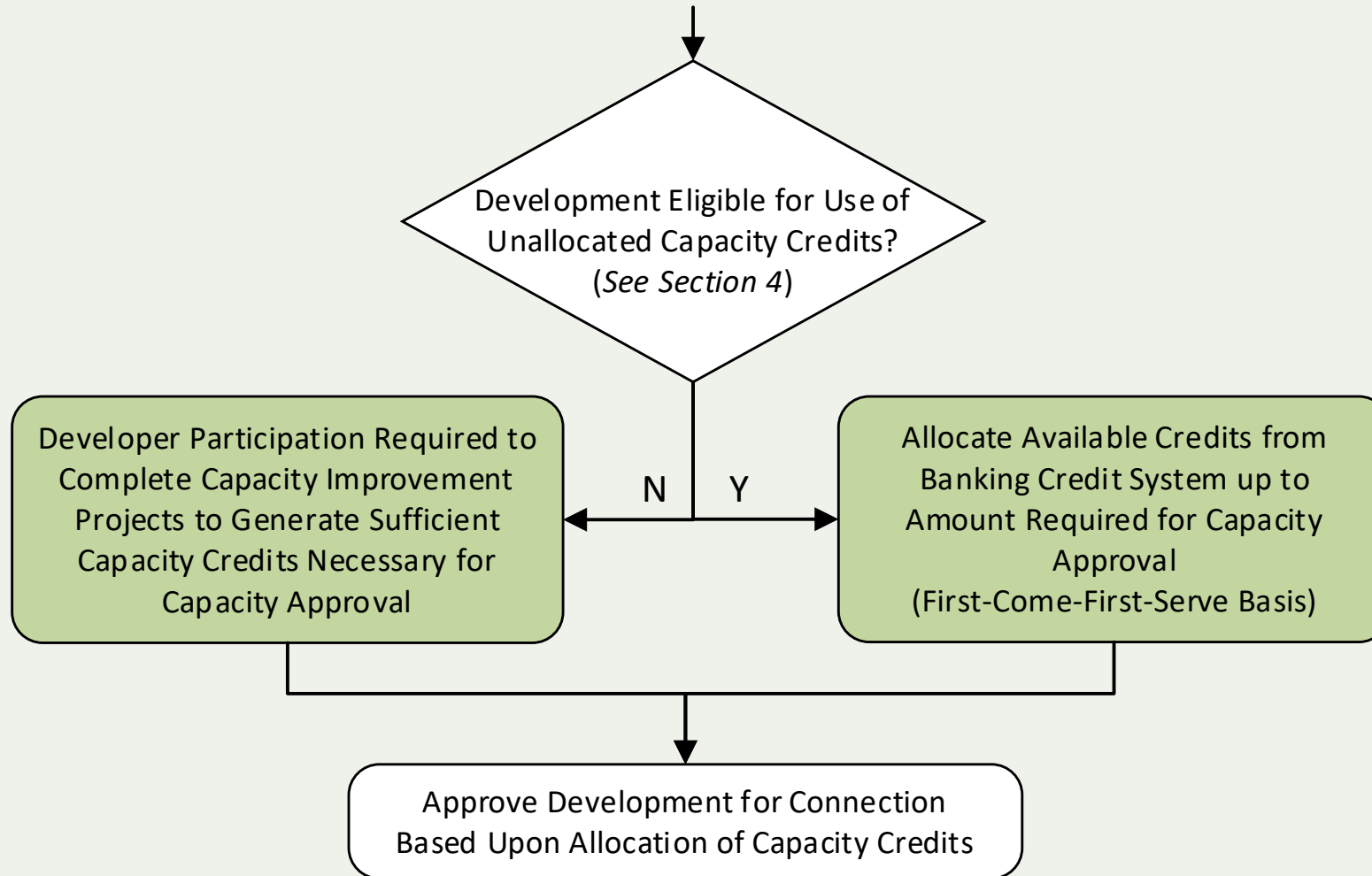
### Community Enhancement Designation

- Affordable and low-income housing developments
- Schools
- Health clinics
- Public safety facilities
- Grocery stores in food deserts
- Developments receiving federal, state, or local grants/funding
- Developments providing community enhancement located in Economic Opportunity Zones

All other developments will be considered on first-come-first-serve basis

# DeKalb's Capacity Assurance Banking Credit Program

## Developer Capacity Approval Process Flow Chart

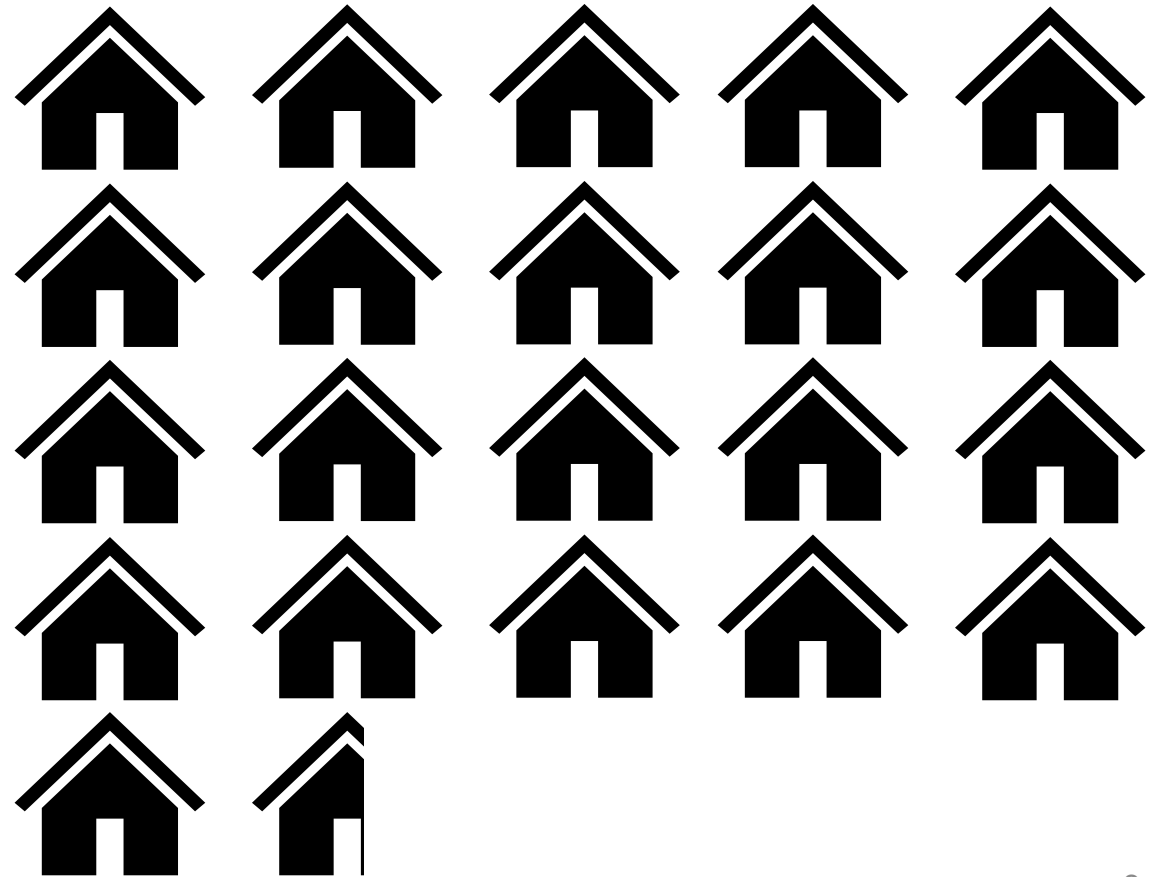


### Requirements for Use of Unallocated Capacity Credits in Banking Credit Program

- Eligibility is based upon development's proposed flow contribution to wastewater system
- Intent is to require larger developments to invest private capital to help further rehabilitate sewer system

- Large Development Flow Thresholds Varies by Model Area
  - As low as 10,000 gpd and as high as 30,000 gpd

**10,000 Gallons Per Day =**





# DeKalb's Capacity Assurance Banking Credit Program

## Additional Requirements for Developments Approved Through Capacity Credits



- Developments Approved via Capacity Credits Must Comply with the Following:
  - Install low-flow plumbing fixtures
  - Prevent discharge of fats, oils, and grease (FOG)
  - Maintain caps on service line cleanouts
  - Maintain private service lines
  - Ensure roof and floor drains are disconnected from wastewater system

**DeKalb County Inefficient Plumbing Fixtures Replacement Plan**

In 1992, the National Energy Policy Act (NEPA) required that, by 1994, all new residential toilets sold in the United States use no more than 1.6 gallons of water per flush. This law also required changes in bathroom and kitchen fixtures. Since then, low-flow plumbing fixtures including toilets, faucet aerators, and showerheads have been manufactured that save substantial amounts of water compared to conventional fixtures.

**As of June 1, 2008**, any residential properties built prior to 1993 in unincorporated DeKalb County must have low-flow toilet and plumbing fixtures installed upon resale before the new homeowner can obtain water service from the County.

**This law goes into effect on January 1, 2009 for commercial properties upon resale. (revised 1/1/12).**

All low-flow plumbing fixtures must meet the appropriate American National Standards Institute (ANSI) guidelines and new homeowners must submit a certificate of compliance signed by a licensed home inspector or licensed plumber.

Penalties for violating the laws include a warning for the first offense, \$250 for the second offense, and \$500 for the third offense.

**To schedule a low-flow inspection by a Department of Watershed Management inspector, please call (770) 270-6243.**

[Click here for ordinance.](#)

[Click here for the Certificate of Compliance.](#)

[Click here for Exemption Form.](#)

[Click here for FAQs.](#)

**Low-Flow Plumbing Fixture Examples**

**Note bath and kitchen faucet flow indicators.**

**Note flow indicators.**

**Low-flow toilets use a maximum of 1.6 gallons of water per flush.**

**Low-flow shower heads use approximately 2.5 gallons of water per minute.**

**Low-flow faucet aerators use approximately 2.2 gallons of water per minute. (revised 1/1/12)**

**Lavatory faucet (bathroom sink) 2.0 gallons of water per minute or Lavatory faucet replacement aerator.**

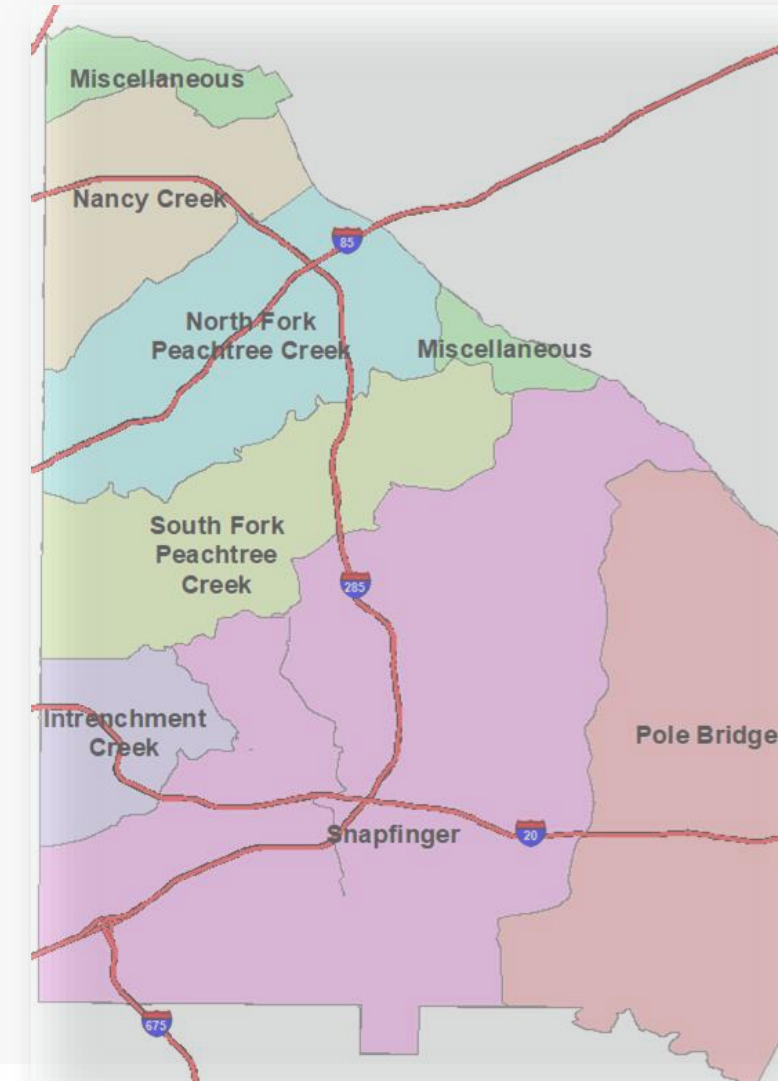
# DeKalb's Capacity Assurance Banking Credit Program

## Capacity Bank: Current Status



### Most Small/Medium Developments can be Approved with Existing Earned Credits

| Model Area                 | Capacity Credits Earned | Credits Reserved for Community Enhancement Projects | Large Development Threshold (gpd) | Large Developments Pending Approval | Small/Medium Developments Pending Approval |
|----------------------------|-------------------------|---|-----------------------------------|-------------------------------------|--|
| Intrenchment Creek         | 102,940                 | 10,000  | 20,000                            | 6                                   | 21   |
| Miscellaneous Model        | 750                     | 5,000   | 10,000                            | 0                                   | 9  |
| Nancy Creek                | 73,707                  | 10,000  | 10,000                            | 9                                   | 27   |
| North Fork Peachtree Creek | 762,790                 | 20,000  | 30,000                            | 9                                   | 47   |
| Pole Bridge                | 24,008                  | 5,000   | 10,000                            | 13                                  | 14   |
| Snapfinger                 | 913,592                 | 30,000  | 30,000                            | 24                                  | 210  |
| South Fork Peachtree Creek | 269,710                 | 20,000  | 20,000                            | 5                                   | 68   |

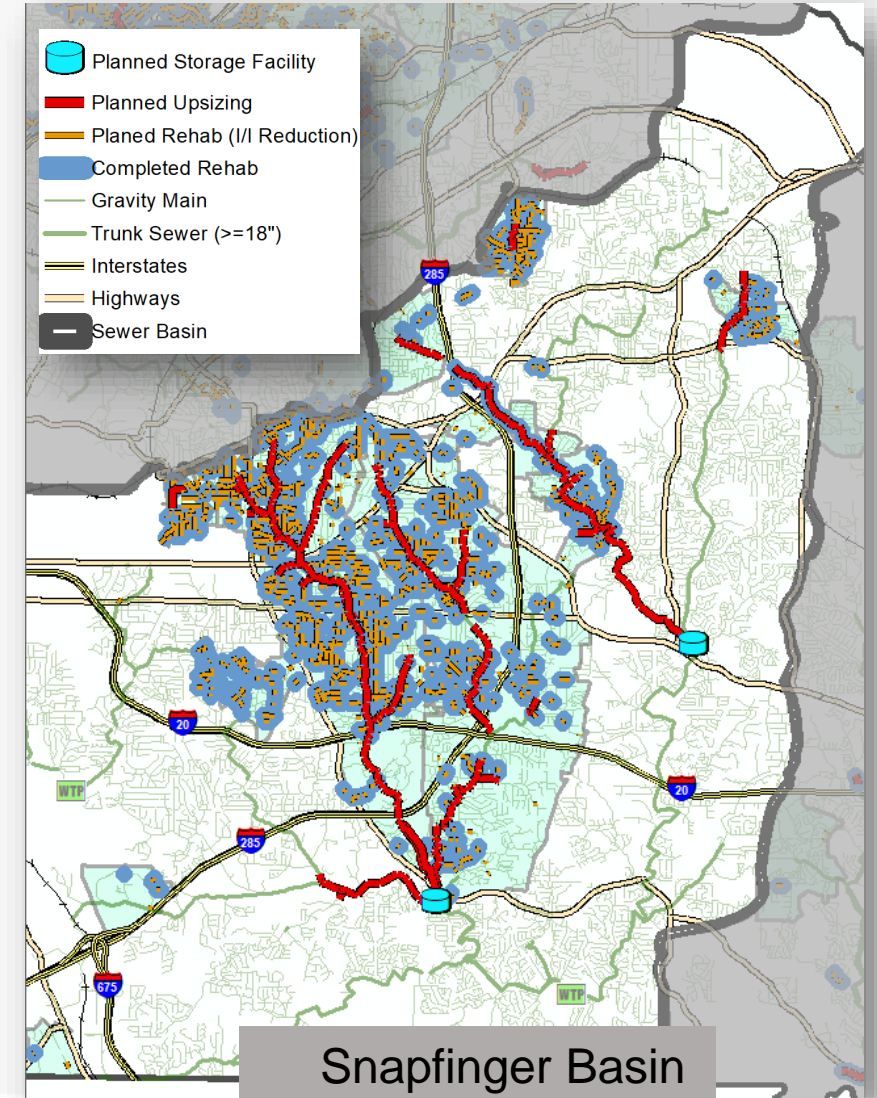


# DeKalb's Capacity Assurance Banking Credit Program

## Snapfinger Basin: Completed and Planned Projects



- Snapfinger Basin
  - Planned System Improvements by Dec. 2027
    - 65 Miles of Rehabilitation
    - 24 Miles of Trunk Sewer Upsizing
    - 11 Miles of Small Diameter Sewer Upsizing
    - 2 Storage Facilities
- Earned Capacity Credits Since April 2019 from Completed Work
  - Over 37 miles of gravity sewer have been rehabilitated
  - 115 vented manhole lids replaced with solid lids
  - 723 missing or defective service cleanout caps replaced
  - Over 873,000 capacity credits earned



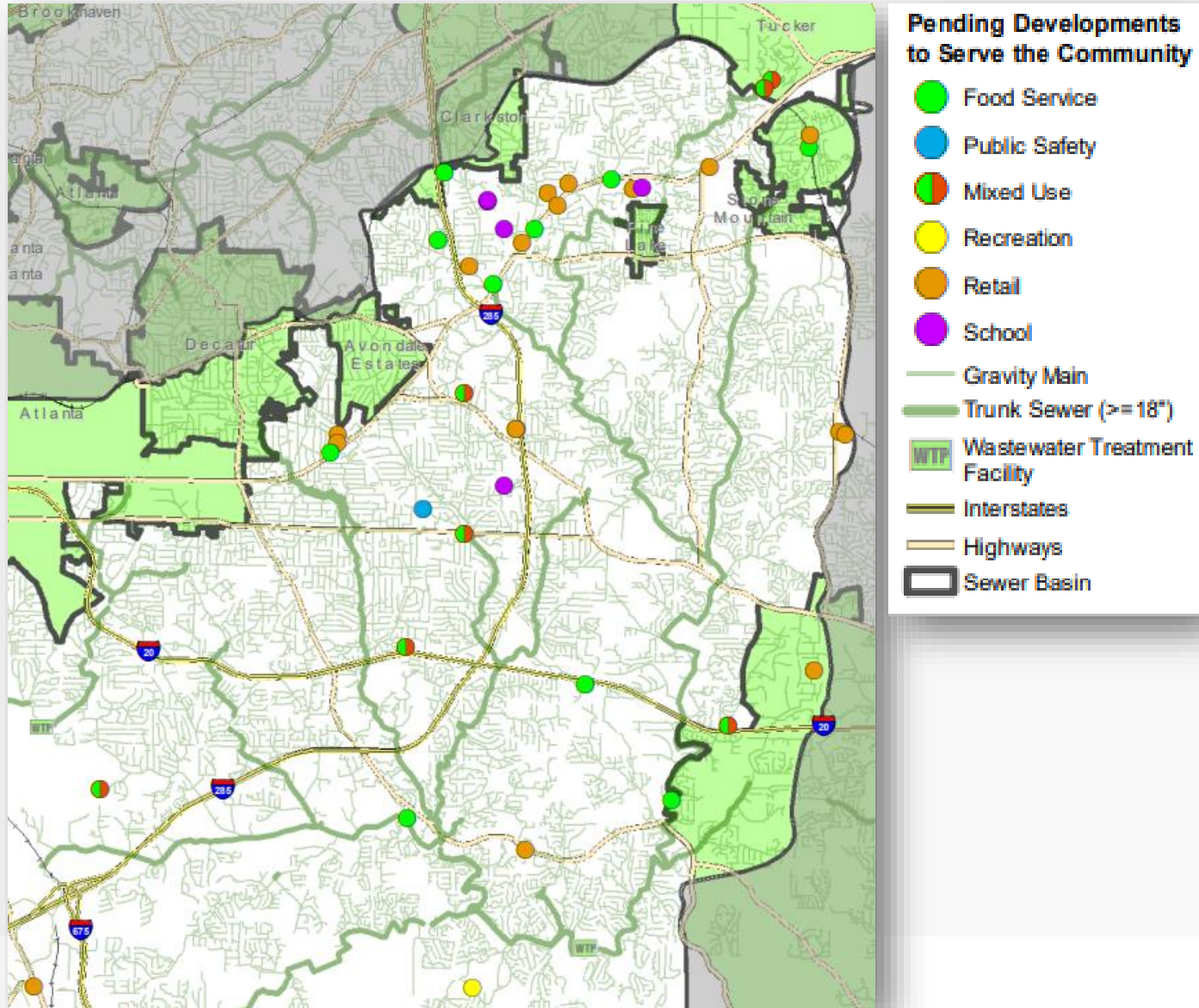
| Year of Capacity Request | Number of Pending Sewer Capacity Request |
|--------------------------|--|
| 2018                     | 55                                       |
| 2019                     | 52                                       |
| 2020                     | 36                                       |
| 2021                     | 83                                       |
| 2022                     | 8  |

- 234 Developments in Snapfinger Await Connection Approval
  - Oldest connection request is from January 5, 2018
- 210 Eligible for Existing Earned Capacity Credits
  - Credits are currently available to approve all eligible developments



# DeKalb's Capacity Assurance Banking Credit Program

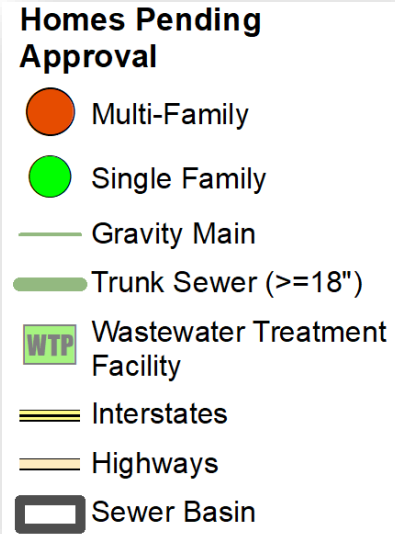
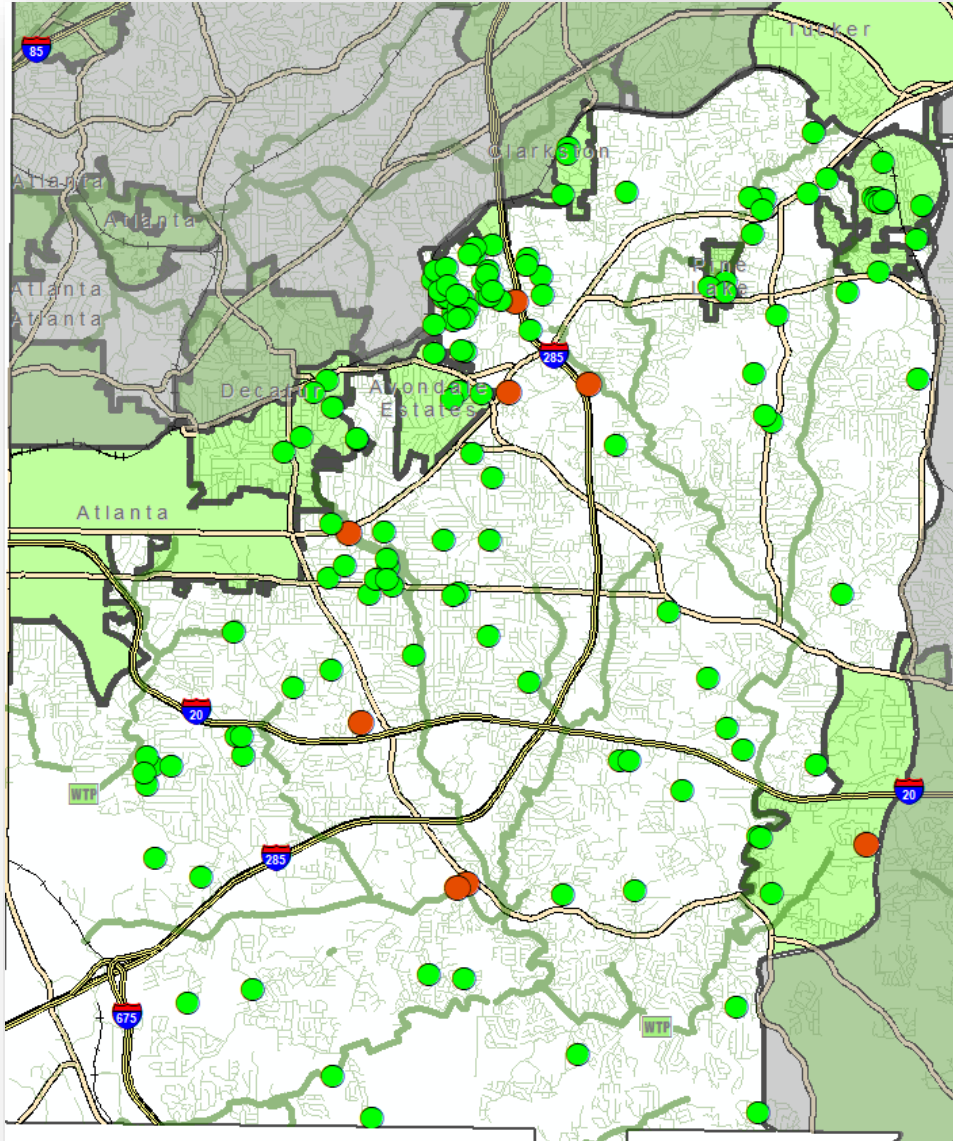
## Snapfinger Basin: Types of Pending Developments



| Type of Development                | Number of Pending Sewer Capacity Request |
|------------------------------------|--|
| Restaurant/Food & Beverage         | 12                                       |
| Retail                             | 16                                       |
| Mixed Use                          | 7  |
| Schools                            | 4  |
| Public Safety (Fire, Police, etc.) | 1  |
| Medical                            | 1  |
| Recreational                       | 1  |
| Church / Religious                 | 1  |
| Single Family Homes                | 174                                      |
| Multi-Family Homes                 | 8 (793 units)                            |
| Offices                            | 4  |
| Warehouse Facilities               | 5  |

# DeKalb's Capacity Assurance Banking Credit Program

## Types of Developments



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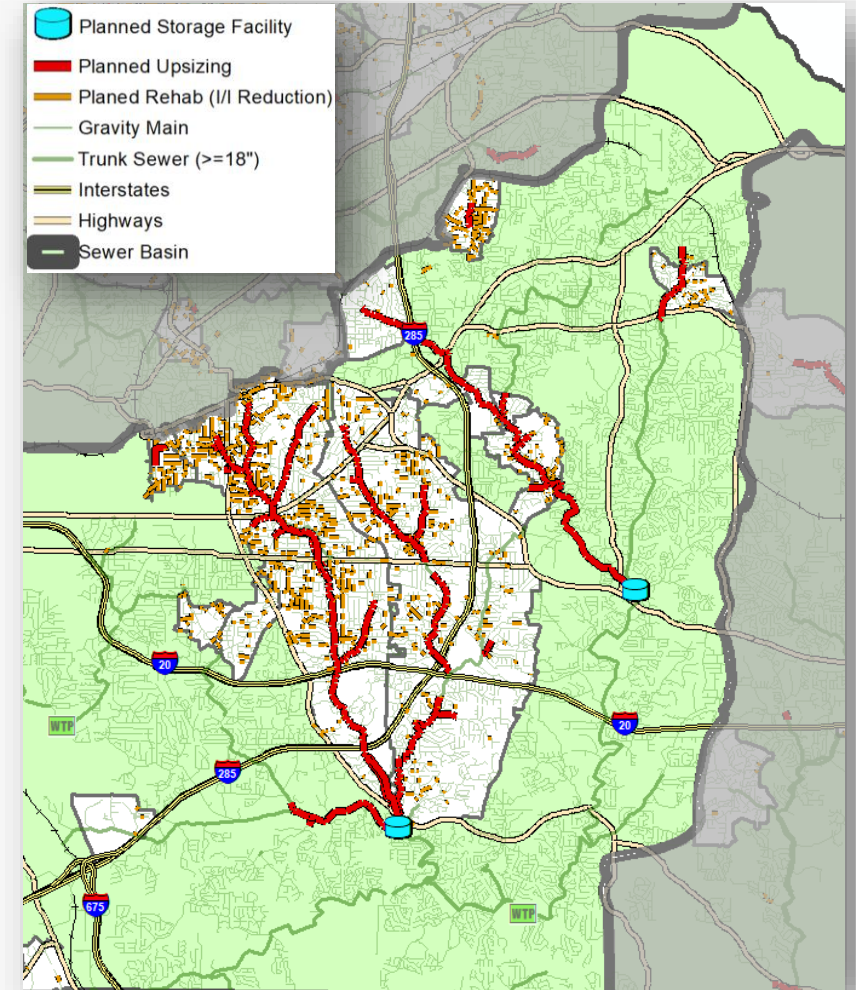
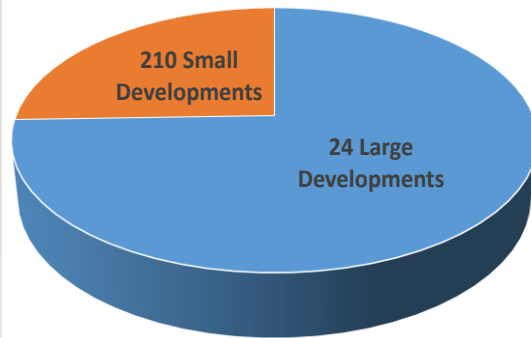
# DeKalb's Capacity Assurance Banking Credit Program

## Snapfinger Basin: Developments to be Approved with Capacity Credits



- 24 Large Developments will be Required to Invest in Additional Rehabilitation
  - Comprise 75% of total estimated flow contributions from pending developments
  - Required private investment will accelerate rehabilitation of areas not part of Consent Decree commitments
  - Up to 25 Miles of rehab required to approve Snapfinger large developments

Comparison of Large and Small Developments  
by Total Flow Contribution



Areas subject to rehabilitation through private investment

- ✓ Process Connection Approvals Associated with Available Capacity Credits
- ✓ Review Pending Developments for Potential Community Enhancement Designations
- ✓ Develop Cost Sharing Agreement Template for Private Participation in Rehab Efforts
- ✓ Communicate with Large Developments Regarding Private Participation Requirements

# Questions?