

City of Easton

Appeal and Credit Manual for Stormwater Fees



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1 INTRODUCTION

1.1 Overview

The City of Easton is the owner of a municipal separate storm sewer system (MS4) . In accordance with the Stormwater Fee Ordinance, the City of Easton has enacted a stormwater user fee. The fee is intended to provide a stable source of revenue for the City's stormwater management program by distributing the cost of stormwater services across all users in the City through a stormwater fee. The Stormwater Management Program Future Level of Service contains the scope of the City's stormwater activities to be supported by the user fee.

The City has established policies and procedures in Section 2 of this Manual regarding a property owner's ability to appeal the stormwater fee. The primary goal of the City's appeal program is to establish a process to address inaccuracies that may have occurred during the calculation of a particular fee. The process provides property owners the ability to appeal their stormwater fee to address:

- Incorrect parcel classification as Single Family Residential (SFR), Non-Single Family Residential (NSFR), Group Parcel, or Undeveloped
- Incorrect square footage of impervious surface
- Mathematical error in calculating fee
- Misapplication of an approved credit.

The City has also developed a system of credits for stormwater service ratepayers who undertake specific approved actions. Section 3 of this Manual details the policies and procedures for stormwater fee credits.

To apply for an appeal determination or for credits, the property owner that is responsible for payment of the fee must fill out an application form and submit it to:

City Engineer
City of Easton
123 S 3rd Street, 3rd Floor
Easton, PA 18042

The application will be evaluated and then a decision will be made based upon the criteria outlined in this Manual. The applicant will be notified by a letter of determination made from the Office of the City Engineer.

1.2 Definitions

Best Management Practices (BMPs): Activities, facilities, measures or procedures used to manage stormwater quantity and quality impacts from the regulated activities listed in § 507-5 of the Easton code, to meet state water quality requirements, to promote groundwater recharge and to otherwise meet the purposes of this chapter.

Credit: Two types of credits exist:

- **Sediment Discharge Reduction Credit:** Non-residential ratepayers would qualify for credit if they install stormwater management controls designed to capture stormwater runoff and reduce sediment discharging via stormwater runoff from their drainage infrastructure to surface water.
- **National Pollutant Discharge Elimination System (NPDES) Credit:** Non-residential ratepayers would qualify for credit if they implement a Preparedness, Prevention and Contingency (PPC) Plan and maintain compliance with a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Industrial Activity or similar individual permit.

Developed parcel: A parcel that contains impervious surface equal to or greater than 500 square feet.

Equivalent Residential Unit (ERU): the measure of the median impervious area for a single-family residential property, and which has been determined by statistical analysis to be 1,797 square feet. An ERU is one billing unit and serves as the billing unit for all other parcels, at 1,797 square feet of impervious area.

ERU rate: The stormwater fee that is applied to each base billing unit which is based on an amount of 1,797 square feet of impervious surface. .

Group parcel: A parcel that includes a building or group of buildings in which dwelling units, offices or floor area are owned individually and the structure, common areas, and facilities are owned by all the owners on a proportional, undivided basis.

Impervious surface: Any material which prevents absorption of stormwater into the ground, including but not limited to buildings, covered decks, patios, driveways, walkways, swimming pools and other similar ground cover.

Non-single-family residential (NSFR) property: Properties such as apartment complexes and common areas associated with condominiums, commercial, institutional, governmental and industrial parcels. Includes all developed parcels that are not single family residential.

Owner: Any person, firm, corporation, individual, partnership, company, association, society or group owning real property in Easton.

Single Family Residential (SFR) property: Detached homes, semi-attached homes, and townhomes.

Stormwater Management Program: the activities of the City necessary to operate, maintain, enhance, and expand the stormwater management system and the activities necessary to carry out the City municipal separate storm system (MS4) permit and the stormwater-related provisions of the City code.

Stormwater Management System: the system of collection and conveyance of stormwater including pipes, conduits, mains, inlets, culverts, catch basins, gutters, ditches, channels, detention ponds, streets, curbs, drains and all devices, appliances and facilities appurtenant thereto used for collecting, conducting, pumping, conveying, detaining, infiltrating, avoiding generation of, and/or treating stormwater.

User: Any person, firm, corporation, individual, partnership, company, association, society, or group using, benefitting from, or being served by the Easton Stormwater Management System.

Undeveloped parcel: A parcel that has not been altered from a natural state that contains impervious surface less than 500 square feet.

2 APPEAL POLICIES & INSTRUCTIONS

The following policy is intended to further clarify Section 9 of the Stormwater Fee Ordinance. A copy of the adopted ordinance is provided in **Appendix 1** and available on the City website.

The City of Easton has established formal policies and procedures with regard to an individual property owner's ability to appeal their stormwater fee. The following appeals process outlines the steps that property owners will need to follow to appeal their stormwater fee to address errors in billing and/or calculations. There are four reasons why a property owner may appeal a fee – it should be noted that with the exception of #1 below, all other reasons for appeal will only apply to non-single family residential parcels:

1. Incorrect parcel classification as: Single Family Residential (SFR), Non-Single Family Residential (NSFR), Group, or Undeveloped;
2. Incorrect square footage of impervious surface;
3. Mathematical error in calculating fee; or
4. Misapplication of an approved credit.

A property owner may also appeal the fee based upon other circumstances not listed above. In such instances, a written statement detailing the nature of the appeal and the reasons for it must be submitted to the Office of the City Engineer.

2.1. Eligibility

Any property owner may appeal the stormwater fee, however all appeals must be based upon potential errors or inaccuracies within the billing system.

2.2. Application

For all appeals, the property owner must submit an application to the City Engineer regarding the nature of the appeal. Application forms are provided in **Appendix B** or upon request at City Hall. There is no application fee to file an appeal.

2.3. Application Deadline

The City will distribute stormwater user fee bills on a monthly basis. For appeal applications to be considered they must be submitted in writing. Determinations made on appeal applications will be applied on the following monthly bill after the decision.

2.4. Application Submission

The completed application and supporting documentation must be submitted to:

City Engineer
City of Easton
123 S 3rd Street
Easton, PA 18042

2.5. Appeal Determinations

The City Engineer will review the documentation submitted by the property owner and provide the property owner with a written approval or denial of the appeal application within 30 days of application.

2.6. Appeal of Determinations

If a property owner contests the decision of the City Engineer, a second appeal may be submitted to the Office of the City Administrator within 30 days of the decision of the City Engineer. If the City Administrator upholds the decision

of the City Engineer, then the property owner is required to pay any outstanding balance associated with the stormwater user fee within 30 days of communication of the decision by the City Engineer.

2.7. Billing Error Corrections and Payment Correction

If the result of the appeal determination requires an adjustment to the bill, the City will correct the associated billing information. If a property owner was billed more than the amount determined by the appeal process, the City will credit the property owner’s stormwater bill for the following month. If the City Engineer determines that the property owner was billed less than the amount determined by appeal process, the City will then adjust the billing amount for the following month.

2.8. Administration of Appeals

The City will reimburse successful appeal applicants that have paid the amount stated on their bills in the form of a credit on subsequent bills. The City will not issue a check in the amount owed to the property owner but will instead apply that amount to property owner’s account. The credit amount will appear on the next monthly bill and be deducted from the total due for that month. In the event the amount of the credit is greater than three times the monthly bill, the City will issue a check to the property owner in the full amount of the credit rather than apply it as a credit to the monthly bill. Examples of this policy are shown below.

Example 1. Inaccurate ERU Calculation with Balance Carried Over

A ratepayer who owns a developed non-residential parcel received a monthly bill for \$303.75 (\$6.75/ERU) for 45 ERUs (80,000 SF/1,797 SF). The ratepayer submits payment for \$303.75 and submits an Appeal Application that includes evidence that they demolished a structure and replaced it with grass. The City Engineer confirmed the ratepayer’s calculation that the demolition activity reduced the impervious surface on the property by 18,000 SF.

Original Parcel Classification	NSFR
Original Impervious Surface Measurement	80,000 SF
Original ERU Calculation	45 ERUs
Original Monthly Fee	\$303.75
Revised Impervious Measurement Determined by Appeal	62,000 SF
Revised ERU Calculation Determined by Appeal	35 ERUs
Revised Monthly Fee	\$236.25

In this example, the City would credit the next monthly bill in the amount of the overpayment.

Example 2. Inaccurate Property Classification with Reimbursement

A ratepayer receives a bill that shows that his property is classified as a Non-Single Family Residential property. The ratepayer provides evidence that the property meets the definition of the Single Family Residential designation and should be billed the flat rate of 1 ERU.

Parcel Classification	NSFR
Original Impervious Surface Measurement	13,700 SF
Original ERU Calculation	8 ERUs
Original Monthly Fee	\$54.00
Revised Parcel Classification Determined by Appeal	SFR
Revised ERU Calculation Determined by Appeal	1 ERU
Revised Monthly Fee	\$6.75

In this example, because the stormwater fee paid is greater than three times the amount owed, the City would issue a check to the property owner in the amount of full overpayment. Subsequent stormwater bills would then be \$6.75 per month.

3 CREDIT POLICIES & INSTRUCTIONS

3.1 General Credit Policies

To determine whether a property qualifies for a credit, a qualifying property owner would need to complete and submit an application to the Office of the City Engineer.. General policies for stormwater fee credits are listed below with specific details for each type of credit being listed in Section 3.4.

- Credit is available to eligible Non-Single Family Residential (NSFR) properties only, as described in the credit policies presented in this Manual and in the credit application.
- Property owners can apply for both credit types for a maximum credit of 50% of the total fee for the parcel.
- It is the responsibility of the property owner to apply for stormwater credits, and to provide the necessary substantiating information with the credit application. Credits for accounts with past due balances will not be considered.
- Credit application forms are available from the Department of Public Works and questions regarding credits should be referred to the City Engineer. City staff are not responsible for initiating, performing engineering calculations, or otherwise assisting with preparation of credit applications.
- The City will only review complete credit applications. The City will decide on credit applications within 45 days of receipt of a complete application. Credits to a stormwater bill will be applied to the next monthly bill if approved at least 15 days prior to the end of the billing monthly.
- All structural stormwater controls for which credit is applied must be working in proper operating condition at the time that the application is submitted and maintained in accordance to paragraph 3.2 below.

3.2 Credit Application and Approval Process

If all requirements and conditions of this section are met, the credit will be applied to the ratepayer's bill upon successful completion of the credit application process and approval by the City. The City may perform an on-site inspection to verify the basis for the credit application.

Credit applications for new developments can occur as part of the normal development plan review procedures. The completed credit application should accompany the final plan for the site. The credit application requires that the structural stormwater controls are constructed and working in proper operating condition, as certified by a Pennsylvania licensed professional engineer.

The credit applicant must grant a right-of-entry or easement to the City to review and approve the credit and to perform occasional inspections to observe that the stormwater management facility is maintained and operating as designed. Right-of-entry is granted via the property owner's signature on the credit application.

3.3 Credit Expiration and Renewal

Once granted, all credits will be in effect for a period of five years. Following the five-year period, the credit will expire, and the applicant will be responsible for submitting a new application for approval.

3.4 Credit Details

3.4.1 Sediment Discharge Reduction Credit

The City's current Stormwater Management Ordinance requires that stormwater management associated with new development and redevelopment is designed to meet specific goals for water quality, infiltration, and release rates. Property owners that achieved the minimum standards that were in effect when the land development plan approval occurred are eligible to apply for the Sediment Discharge Reduction Credit.

- The Sediment Discharge Reduction Credit is available to NSFR properties that have constructed onsite structural stormwater controls.
- Credit applications for the Sediment Discharge Reduction Credit shall include documentation (plans, calculations, models, reports, etc.) prepared by a Pennsylvania licensed professional engineer and as-built plans prepared by a Pennsylvania licensed professional engineer or surveyor.

- The structural stormwater controls providing Sediment Discharge Reduction must, at a minimum, be designed and constructed in accordance with the current City Stormwater Management Ordinance and the Pennsylvania BMP Manual.
- Structural stormwater controls built to provide Sediment Discharge Reduction must reduce the rate of sediment discharge (lbs of sediment/year) from the drainage area by at least 25% when compared to the previous discharge from that same land area.
- Structural stormwater controls constructed prior to the date of adoption of the fee ordinance are not eligible for the Sediment Discharge Reduction Credit unless they are converted to reduce sediment discharge by 25% as described above.
- The applicant must be responsible by ownership, or written agreement with the owner, for the operation and maintenance of the stormwater controls for which credit is being requested.
- The applicant must include an adequate operation and maintenance plan and executed maintenance agreement for the stormwater controls for the City to review and approve prior to obtaining the credit.
- A credit shall only be applied to the portion of the property’s impervious surface served by the stormwater control that achieves the necessary sediment discharge rate reduction.
- Eligible Property owners achieving the necessary 25% reduction in sediment discharge will receive a 25% credit on their stormwater bill for the impervious surface served by the stormwater control.
- Property owners shall provide a statement annually to the City certifying that they are maintaining the stormwater controls in accordance with the City-approved operation and maintenance plan and executed maintenance agreement.
- If the City finds that the applicant fails to operate and maintain the stormwater control consistent with the operation and maintenance plan and executed maintenance agreement as required, the City will notify the applicant in writing. The applicant will then have 30 days to make the necessary corrections or the credit will be discontinued.
- If the structural stormwater control has been found to be operating inadequately and corrections have not been made within 30 days of notification by the City in writing, the credit will be revoked and reflected in the next billing period. A new application will be required to renew the credit.

Example 1. Sediment Discharge Reduction Credit Example (No Existing Stormwater Management)

A property owner redevelops the site of an existing warehouse and parking lot and maintains 40,000 square feet of impervious surface. No stormwater controls that manage water quality volume, infiltration volume, or release rate exist on site. New stormwater controls are consistent with the City’s standard for managing the water quality volume, infiltration volume, and release rate. The property owner’s design includes an Extended Dry Detention Basin that is consistent with the Pennsylvania BMP Manual. This feature serves 30,000 square feet of impervious area on the parcel.

The ratepayer provides the City with documentation that the Extended Dry Detention Basin is designed and constructed to reduce sediment discharge by 60% when compared to the preceding condition. The property owner commits to operating the feature consistent with an operations and maintenance plan and executed maintenance agreement. The table below shows how the credit is applied to this account.

Parcel Classification	NSFR
Impervious Surface Measurement	40,000 SF
ERU Calculation	22 ERUs
Original Monthly Fee	\$148.50
Impervious Surface Treated by Qualifying Stormwater Control	30,000 SF
Revised ERUs: $(40,000 \text{ SF} - (30,000 \text{ SF} * 25\%))/1,797 \text{ SF}$	18 ERUs
Revised Monthly Fee	\$121.50

Example 2. Sediment Discharge Reduction Credit Example (Existing Stormwater Management)

A property owner redevelops the site of an existing office building and parking lot and maintains 24,000 square feet of impervious surface. Two existing Dry Detention Basins with a sediment reduction effectiveness value of 10% exist to manage the runoff from the current site.

One existing Dry Detention Basin manages runoff from a drainage area that includes 8,000 square feet of impervious surface. The second Dry Detention Basin manages runoff from a drainage area that includes 16,000 square feet of impervious area. The property owner designs and constructs improvements to the site that are consistent with the City's land development regulations.

The property owner converts the first Dry Detention Basin into a Bioretention – Raingarden structure over B soils with a sediment reduction efficiency of 80%. Because this improvement to the stormwater control will reduce sediment discharge by more than 25%, the Sediment Discharge Reduction Credit can be applied to the impervious surface within the drainage area to the control.

A second existing Dry Detention Basin manages runoff from 16,000 square feet of impervious surface, also with a sediment reduction efficiency of 10%. The property owner removes this structure and replaces it with Filter Strips to meet the City Stormwater Management Ordinance. The sediment effectiveness of this feature is 22%. This control will reduce sediment discharge from its drainage area by less than 25% and is therefore not eligible for the credit.

The property owner commits to operating the eligible stormwater control feature consistent with an operations and maintenance plan and an executed maintenance agreement. The table below shows how the credit is applied to this account.

Parcel Classification	NSFR
Impervious Surface Measurement	24,000 SF
ERU Calculation	13 ERUs
Original Monthly Fee	\$87.75
Impervious Surface Treated by Qualifying Stormwater Control	16,000 SF
Revised ERUs: $(24,000\text{SF} - (16,000\text{ SF} * 25\%))/1,797\text{ SF}$	11 ERUs
Revised Monthly Fee	\$74.25

3.4.2 NPDES Credit

Property owners that have developed and implemented a stormwater Preparedness, Prevention and Contingency (PPC) Plan and comply with a National Pollutant Discharge Elimination System (NPDES) *General Permit for Discharges of Stormwater Associated with Industrial Activity*, are eligible to apply for the NPDES Credit. Property owners qualify for the credit if they provide documentation to the City that they are in compliance with their NPDES permit as authorized by the Pennsylvania Department of Environmental Protection (DEP). If a property owner has an individual (or comparable) permit for stormwater discharge from DEP, the property owner should present documentation that they are compliant with all standards of that permit as authorized.

- Credit applications for the NPDES Credit shall include a copy of the PPC Plan, prepared in conformance with the standards of the DEP, as well as appropriate documentation to demonstrate authorization to discharge, PPC Plan implementation, and permit compliance (i.e. completed checklists, annual reports, sampling data, etc.).
- Eligible property owners that are compliant with their NPDES permit will receive up to a 25% credit on their stormwater bill.
- A credit shall be applied only to the impervious surface on the site that is subject to the NPDES permit for industrial stormwater discharge.
- If the City finds that the applicant is out of compliance as determined by DEP, the City will notify the applicant in writing. The applicant will then have 30 days to make the necessary corrections or the credit will be discontinued.

- To maintain their credit, property owners shall submit their annual report to the City as submitted to DEP, as well as a statement certifying their compliance with the permit.

Example 1. NPDES Credit Example

A ratepayer operates a facility that complies with Pennsylvania DEP’s NPDES program for industrial stormwater discharge. The ratepayer receives a bill for their parcel that is authorized to discharge stormwater under the permit. The ratepayer provides the City with proof of compliance with the NPDES permit and submits a Stormwater Fee Credit Application. The table below shows how the credit is applied to this account.

Parcel Classification	NSFR
Impervious Surface Measurement	72,000 SF
ERU Calculation	40 ERUs
Original Monthly Fee	\$270
Impervious Surface Associated with the NPDES Permit	64,000 SF
Revised ERUs: $(72,000 \text{ SF} - (64,000 \text{ SF} * 25\%)) / 1,797 \text{ SF}$	31 ERUs
Revised Monthly Fee	\$209.25

Appendix 1: Stormwater Fee Ordinance

Appendix 2: Stormwater Fee Appeal Application

City of Easton

Stormwater Fee Appeal Application

This application is for parcel owners to appeal their stormwater fee with regard to billing errors or calculation inaccuracies. Pertinent sections must be filled out in their entirety, and the applications must be signed. Please submit one application and required documentation per parcel. Applications must include all required documentation and signatures to be considered complete. Only completed applications will be reviewed.

Parcel Information		
Date:	Applicant Name:	
Mailing Address:	Email:	
	Phone Number:	
	<i>The information provided in this application is correct to the best of my knowledge. As owner, I give permission for a City representative to enter my property to verify these statements provided the City provides adequate notice.</i>	
	Signature: _____	
Property Address (if different from above):		
Parcel ID #:		
Utility Account #:	Utility Bill Date: / / 20	Stormwater Fee: \$

Reason for Appeal: (Check Applicable)
<input type="checkbox"/> Incorrect parcel classification <input type="checkbox"/> Incorrect square footage of impervious surface <input type="checkbox"/> Mathematical error in calculating fee <input type="checkbox"/> Misapplication of an approved credit
Checklist (please include the following documents with this application):
<input type="checkbox"/> Complete and signed Stormwater Fee Appeal Application If the appeal is related to the amount of impervious surfaces or number of ERUs, the following additional documentation must be provided: <input type="checkbox"/> A plot plan, map, aerial image, or similar information detailing actual impervious surfaces currently on-site. <input type="checkbox"/> Proposed correction, in the applicant's opinion, of impervious surface measurement or number of ERUs associated with the property for which an appeal is being requested.

Appeal description (Please provide a detailed written statement of the nature of the appeal. Attach additional sheets if necessary):

Proposed correction for incorrect property classification:

Original Classification:

- Single Family Residential
- Non-Single Family Residential
- Undeveloped/Not Billed
- Group Parcel

Proposed Classification:

- Single Family Residential
- Non-Single Family Residential
- Undeveloped/Not Billed
- Group Parcel

Proposed correction of impervious surface measurement, number of ERUs, or credit (Please provide supporting information and calculations):

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Received By:	Date Received:
Reviewed By:	Date Reviewed:
<input type="checkbox"/> Application administratively complete	
Appeal Determination	
<input type="checkbox"/> Granted	<input type="checkbox"/> Denied
Fee Adjustment	
Initial Fee:	Amount of Adjustment:
<input type="checkbox"/> Adjustment due next billing cycle(s):	<input type="checkbox"/> Rebate due:

Appendix 3: Stormwater Fee Credit Application

City of Easton

Stormwater Fee Credit Application

This application is for property owners to use to apply for credit on their stormwater fee. Please submit one application for each parcel for which you are requesting credit. Applications must be filled out in their entirety and all required supporting documentation must be attached. There is a \$25 credit application fee.

Parcel Information		
Date:	Applicant Name:	
Mailing Address:	Email:	
	Phone Number:	
	<i>The information provided in this application is correct to the best of my knowledge. As owner, I give permission for a City representative to enter my property to verify these statements provided the City provides adequate notice.</i>	
	Signature: _____	
Property Address (if different from above):		
Parcel ID #:		
Utility Account #:	Utility Bill Date: / / 20	Stormwater Fee: \$

Credit Type (select all that apply)	
<input type="checkbox"/> Sediment Discharge Reduction (complete Section 1 below)	<input type="checkbox"/> NPDES (complete Section 2 below)

Section 1: Sediment Discharge Reduction Credit

Checklist (please include the following documents with this application):
<input type="checkbox"/> Complete and signed Stormwater Fee Credit Application <input type="checkbox"/> Application Fee (non-refundable) of \$25, made payable to <i>City of Easton—Stormwater</i> <input type="checkbox"/> Written description of the stormwater control and credit request <input type="checkbox"/> Design documentation/engineering analysis of the stormwater control <input type="checkbox"/> As-built plans of the stormwater control <input type="checkbox"/> Letter of Certification from the owner's Engineer of Record stating that the project was built in accordance with the approved designs <input type="checkbox"/> City-approved maintenance plan and agreement

Section 2: NPDES Credit

Checklist (please include the following documents with this application):
<input type="checkbox"/> Complete and signed Stormwater Fee Credit Application <input type="checkbox"/> Application Fee (non-refundable) of \$25, made payable to <i>City of Easton—Stormwater</i> <input type="checkbox"/> Documentation of DEP authorization to discharge stormwater under an NPDES permit <input type="checkbox"/> Preparedness, Prevention and Contingency Plan as provide to DEP <input type="checkbox"/> Compliance records showing compliance with DEP industrial stormwater discharge permit

For City Use Only

Received By:	Date Received:		
Reviewed By:	Date Reviewed:		
<input type="checkbox"/> Application Fee Paid	<input type="checkbox"/> Application administratively complete		
Rate Calculation			
Credit Type:	Impervious Surface Eligible for Credit	Credit %	Reduction in Impervious Surface Subject to Fee
<input type="checkbox"/> Sediment Discharge Reduction Credit	_____	x 25%	_____ (A)
<input type="checkbox"/> NPDES Credit	_____	x 25%	_____ (B)
Subtract (A) and (B) from Total Impervious Surface to calculate Impervious Surface Subject to Fee:			
Impervious Surface Subject to Fee / 1,797 SF = New ERU: (rounded to the nearest ERU)			