

City of Wilson

Stormwater Control Measures Application

Project Narrative

Describe the source of the water that is causing the stormwater quality and/or quantity issue. For example, (1) is the issue caused by water that flows into the project area from upstream, overflows the banks of a stream, and then spreads out into the project area; or (2) is the issue caused by rain that falls directly on the project area?

Stormwater flows related to the three stormwater control measures (SCMs) that make up this project is generally from urban areas in and near the downtown areas of the City of Wilson (City). This area is in the Hominy Swamp watershed which is impaired due to stormwater runoff and channelization. Hominy Swamp's watershed begins north of the City around the City's airport and flows south through the City (see Figure 1). The City has generally not had much growth in recent years and the impacts to Hominy Swamp date back several decades. Most newer growth in the City is west of Ward Boulevard mostly outside of the Hominy Swamp watershed.



Figure 1 – Hominy Swamp Watershed; source USGS StreamStats

The key water quality and water quantity issues are related to impairment associated with benthic macroinvertebrates in Hominy Swamp (see Attachment 1 – 2022 Integrated Report). In December 2004 the North Carolina (NC) Department of Environment and Natural Resources (now Department of Environmental Quality or DEQ) finalized the Hominy Swamp Creek Watershed

Assessment and Restoration Plan (see Attachment 2) to develop an overall strategy to address issues in Hominy Swamp.

The City is working cooperatively with the North Carolina Department of Environmental Quality to address the impairment to benthic macroinvertebrates in Hominy Swamp through a Category 4b demonstration. For the Category 4b demonstration, the City is implementing a local waterbody restoration plan (i.e., Hominy Swamp Category 4b Plan included in Attachment 3), one of only a few community developed plans in the state. There are only 4 plans of this type are listed on DEQ's webpage ([Approved TMDL Alternatives | NC DEQ](#)). The plan aims to restore macroinvertebrates communities in Hominy Swamp to achieve a Good-Fair rating or better through the implementation of pollution controls. The pollution controls focus runoff management, source reduction, and landscape and riparian resiliency.

The proposed SCMs receive ephemeral drainage from developed areas within the Hominy Swamp watershed and will provide water quality and water quantity benefits prior to discharge or downstream conveyance of stormwater to Hominy Swamp thereby achieving the Category 4b plan goal of runoff management.

If the issue is caused by water flowing from upstream that overflows the banks of a stream, estimate the length of the stream bank that is impacted by the overflow and the acreage that is flooded by the overflow. If the issue is caused by rain falling directly on the project area, estimate the area that is problematic (e.g., an area 5 blocks wide by 3 blocks long).

Project area drainage areas are:

- Starmount SCM 14 acres
- Walnut SCM 130 acres
- Fire Station SCM 69 acres

Provide maps at a readable scale that clearly depict the following:

- *Location of the proposed stormwater project: See Figure 2 and Attachment 4*
- *Drainage area of the proposed stormwater project: See Figure 2 and Attachment 4*
- *Inlet and outlet locations of the proposed stormwater infrastructure: See Attachment 4 for up close details of each proposed SCM*
- *Sufficient labels of geographical references and landmarks such as roads, streams, river, political boundaries, etc. to identify the location of the project:*

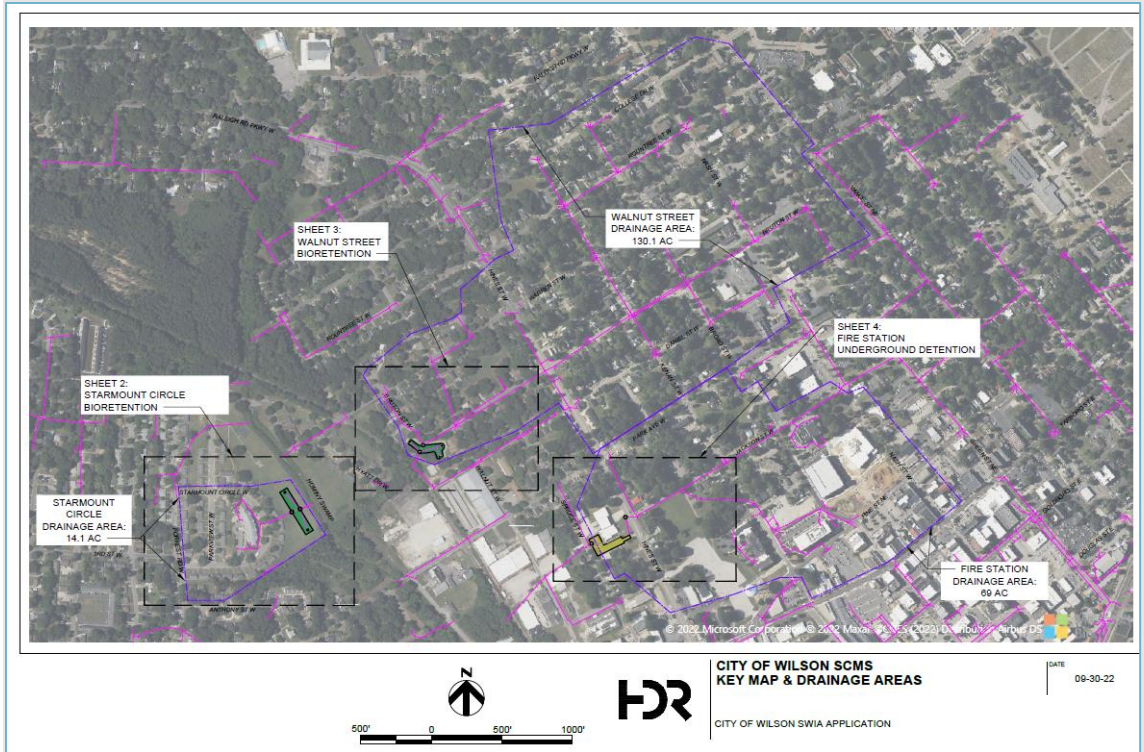


Figure 2 – Location and drainage areas of proposed SCMs

Do you have an established stormwater utility as of the date of this application? If so, when was the utility created and when were the first stormwater fees collected? Do you have an established Stormwater Enterprise Fund as of the date of this application? If so, provide the following information:

- *When the Fund was created and when the first stormwater fees were collected*
- *Number of single-family residential stormwater accounts*
- *Number of non-single-family residential stormwater accounts*
- *Number of commercial, industrial, and institutional stormwater accounts*
- *Single-family residential stormwater rate or fee per month*
- *Non-single-family residential stormwater rate or fee per month*
- *Commercial, industrial, and institutional stormwater rate or fee per month*

The City does have a stormwater utility and associated stormwater enterprise fund. Attachment 5 – Documentation of Stormwater Utility provides the resolution and excerpts of the FY2021 ACFR related to the Stormwater Enterprise Fund.

- The stormwater management fund was created in 2002. The first fees were collected on July 1, 2002.
- As of August 2022, the number of single-family residential stormwater accounts was 20,761.
- Non-single-family residential stormwater accounts are included in the single-family residential account number. The City does not separate the two types of accounts.

- As of August 2022, the City has 1,701 commercial accounts, 29 industrial accounts, and 48 utility accounts (accounts that do not fall under residential, commercial or industrial).
- The single-family residential charge for one equivalent residential unit (ERU), as of August 2022, is \$6.00. An ERU was calculated to be equivalent to 2,585 sq. ft. of impervious area.
- Non-single-family residential stormwater accounts are included in the single-family residential account number. The City does not separate the two types of accounts.
- The rate for commercial, industrial, and utility accounts is proportional to the amount of impervious area located onsite. For example, a 10,000 sq. ft. commercial building would be charged for four ERUs (10,000 sq. ft. divided by 2,585 sq. ft. rounded up). Thus, the charge would be \$24.00 (4 ERU multiplied by \$6.00 per ERU). As of August 2022, the average commercial fee was \$115.99, the average industrial fee was \$786.21, and the average utility fee was \$193.39.

Estimate the amount of revenue collected in the past 12 months that is used to pay for stormwater work and state the source of the revenue.

Over the last 12 months (September 1, 2021 through August 31, 2022), the City billed for \$5,342,530.80 and received \$5,142,857.46 through the stormwater management fund.

Estimate the amount of funds expended in the past 12 months to pay for stormwater work and state the source of the funds; for example, from the General Fund, from the Stormwater Enterprise Fund, etc.

Over the last 12 months, the City spent approximately \$5,165,399 to pay for stormwater projects from the stormwater management fund. The general fund does not contribute to the stormwater enterprise fund.

Do you have a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit? If so, provide the permit number, the date the permit was issued, and a summary of any compliance issues.

The City is currently not designated as an MS4 program. However, the City has begun preparations for when the notice from NCDEQ is received.

If the purpose of the project is to construct or plan for new stormwater conveyance infrastructure and if the new stormwater conveyance infrastructure will receive additional runoff from future upstream growth and development or increased storm intensity, document how the volume of stormwater runoff from the future growth and development or increased storm intensity will be managed so that the additional runoff will not cause new or increased flooding or exacerbate flood risks downstream of the new stormwater conveyance infrastructure, and how the

additional runoff will not cause new or worsen or exacerbate water quality issues downstream of the new stormwater conveyance infrastructure.

The project does not consist of any conveyance infrastructure. The drainage for the SCMs is already developed and additional runoff from new development is not expected.

If seeking funding for a stormwater planning study, the stormwater project narrative must include a detailed description of the proposed stormwater planning activity and the goals of the proposed planning activity.

N/A – This is not a study-type project.

Describe any public input sessions or notifications about the project that have been specifically focused on residents and/or businesses that may be most directly impacted by the project.

No public input sessions have been conducted for the specific SCMs that would be funded by this grant. However, there have been significant public input and awareness related to the Hominy Swamp impairment and flooding impacts along Hominy Swamp as part of overall planning efforts. As an example, as part of the Hominy Creek [Swamp] Greenway and Water Quality Park Master Plan there was significant public involvement as highlighted in the plan, which identifies some of the SCMs to be designed and constructed as part of this funding request. (see Figure 3 from the plan).

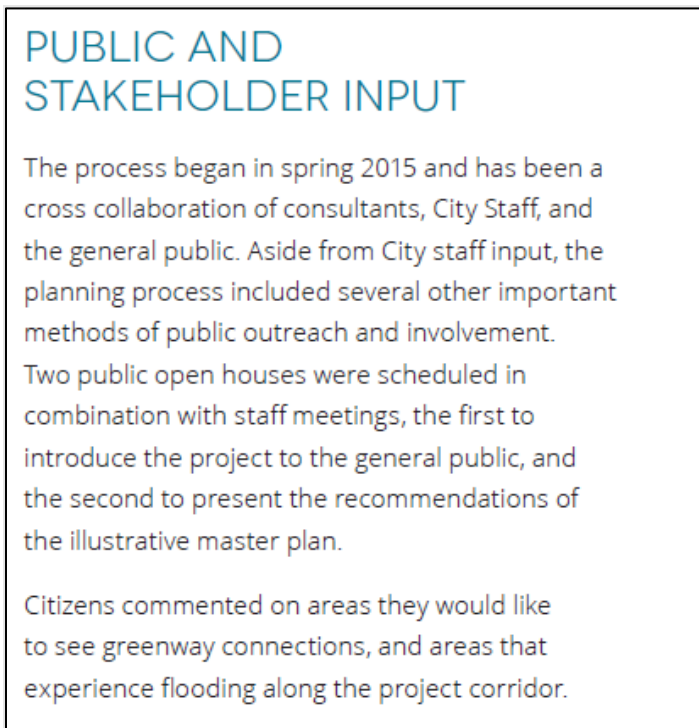


Figure 3 – Public Input on Hominy Creek Greenway and Water Quality Park Master Plan

City of Wilson
Stormwater Control Measures Application

Priority Points Narrative

Line Item 1.A.1. – Proposed SCMs are Nature-Based Stormwater Solutions (35 points)

This project consists of the Elizabeth Street bioretention/wetlands SCMs and the Hines Fire Department Flood Reduction SCM located near the downtown area of the City, all of which are located on City-owned land in the Hominy Swamp watershed. Hominy Swamp is an impaired stream and routinely experiences flooding. The selected SCMs treat stormwater flows where no current water quality treatment exists and reduce or attenuate runoff volumes as part of a collective effort to restore historical hydrology in Hominy Swamp (i.e., implementation of 4b plan).

The Elizabeth Street bioretention/wetlands SCMs consist of SCMs that are in the Elizabeth Street (shown on some maps as Elizabeth Road) area of the City and will adhere to the North Carolina Stormwater Design Manual Part C: Minimum Design Criteria and Recommendations for Stormwater Control Measures. The first Elizabeth Street SCM is a bioretention basin located just off Walnut Street. The Walnut Street Bioretention SCM (Walnut SCM) is sized to treat 6% of the water quality volume (14,000 cubic feet) for a drainage area of 130 acres. The second Elizabeth Street SCM is a bioretention basin or stormwater wetland located just off Starmount Circle (Starmount SCM). A constructed stormwater wetland may be constructed given its floodplain location, but a more detailed understanding of the seasonal high ground water table is needed as a key design consideration before finalizing this SCM type. As a bioretention SCM, it is sized to treat 100% of the water quality volume (21,000 cubic feet) for a drainage area of 14 acres. In addition, the Starmount SCM reduces the 1-year and 10-year runoff volumes by 30% and 11%, respectively. Figure 2 shows the location of the Elizabeth Street (Walnut Street and Starmount Circle) bioretention/wetlands SCMs. These Elizabeth Street SCMs are nature-based SCMs and are more than 50% of the overall project budget.

The Hines Fire Department Flood Reduction SCM (Fire Station SCM) is an underground detention system located at the Headquarters Fire Station on Hines Street (Figure 2). The Fire Station SCM is sized to contain 83% of the water quality volume (110,000 cubic feet) for a drainage area of 69 acres. . In addition, the Fire Station SCM attenuates 27% and 11% of the 1-year and 10-year runoff volumes, respectively. The detention system will reduce overland flooding down Jackson Street that routinely inundates the station. The Fire Station SCM may be equipped with an integrated sand filter system to treat a portion of the water quality volume if it is determined to be a co-benefit during design. The Fire Station SCM is not a nature-based SCM; however, it is less than 50% of the budget.

Per the North Carolina Stormwater Design Manual bioretention SCMs are one of the most effective SCMs for removing pollutants, because they use many different pollutant removal mechanisms, including infiltration, absorption, adsorption, evapotranspiration, microbial action, plant uptake, sedimentation, and filtration. Bioretention SCMs will be designed to include internal water storage, which is beneficial for the denitrification of nitrates. These pollutant

removal elements will directly benefit the impaired Hominy Swamp which is directly downstream of these SCMs and the Neuse River estuary which is also impaired (for nutrients) and further downstream. In addition, bioretention SCMs also help to reduce stormwater temperatures, recharge groundwater and attenuate peak flows that help to restore historic hydrologic conditions. Stormwater wetlands are constructed systems that mimic the functions of natural wetlands and use physical, chemical, and biological processes to treat stormwater with similar benefits to bioretention SCMs. As stated above, a more detailed understanding of the of the seasonal high ground water table will be critical input to nature-based SCM selection for the Starmount SCM.

Attachment 4 includes overall location of all SCMs and individual locations of each SCM with drainage areas and existing stormwater infrastructure.

Line Item 2.A.1. – Project directly benefits subwatersheds that are impaired (15 points)

As noted in the project narrative, all three SCMs are in the Hominy Swamp watershed and are part of the Hominy Swamp Category 4b Plan implementation. Hominy Swamp is listed as impaired in the 2022 Integrated Report which is included in Attachment 1 and shown as an excerpt in Figure 4. A map of the Hominy Swamp through the City from the DEQ Map Locator is shown in Figure 5 that shows Hominy Swamp highlighted along with the AU Number of Hominy Swamp (i.e., 27-86-8) for reference that corresponds to the excerpt of 2022 Integrated Report.

Hominy Swamp	27-86-8	C;Sw,NSW	9.9	FW Miles
8580	From source to Contentnea Creek			
2022 Water Quality Assessments				
PARAMETER	IR CATEGORY		CRITERIA STATUS	
Benthos (Nar, AL, FW)	4b		Exceeding Criteria	
Fish Community (Nar, AL, FW)	3b		Data Inconclusive	

Figure 4 – Excerpt from the 2022 Integrated Report, Pg 709

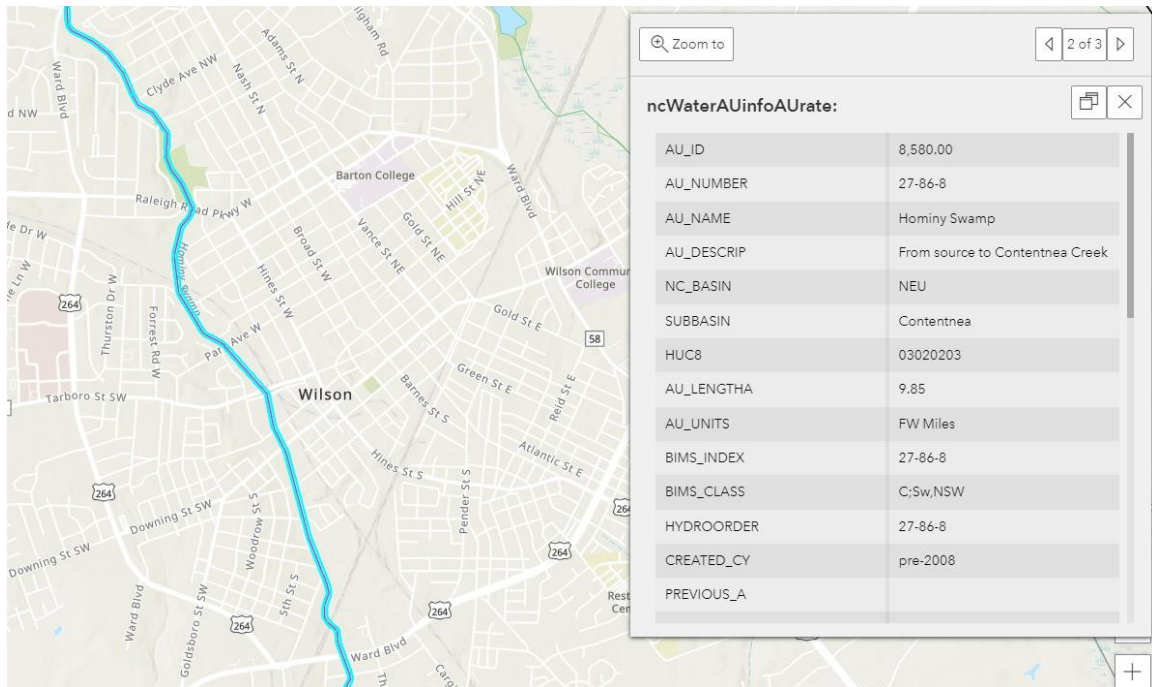


Figure 5 – Hominy Swamp highlighted in DWR Map Locator - Public (arcgis.com)

These SCMs will provide direct water quality and quantity benefits for an impaired watershed and will also have secondary (but direct) benefits to the larger Neuse River watershed that is nutrient sensitive and also impaired. Note that due to the impairment including benthic macroinvertebrate impacts, water quantity is also a water quality issue. That is, higher stormwater flows increase flow velocity, which results in bed scour that is known to degrade the aquatic habitat. This is expressed in DEQ’s Hominy Swamp Creek Watershed Assessment and Restoration Plan discussion of water quality (see Figure 6 below) that peak flows contribute to erosion (i.e., bed scour) and addressed as a focus of the Hominy Swamp Category 4b plan. The Hominy Swamp Creek Watershed Assessment and Restoration Plan is included as Attachment 2.

4 Existing Water Quality:

Hominy Swamp Creek is classified by the NC Division of Water Quality (DWQ) as Class C Nutrient Sensitive Waters (NSW) Swamp Waters (SW). Most of the waters in the larger subbasin of Contentnea Creek (Neuse 07, 700 sq. mi.) are similarly classified, barring those designated as public water supply watersheds. The mainstem of Hominy Swamp Creek becomes perennial at the confluence of two intermittent tributaries north of Forest Hills Road; most others waters within the watershed are intermittent according to USGS maps. At base flow, Hominy Swamp Creek is a slow moving swamp waters system, impacted by channelization over time that has caused it to function in many segments primarily as drainage and stormwater conveyance. Precipitation averages 48” a year in the area, and common rainfall events can cause high peak, erosive storm flow.

Figure 6 – Excerpt from Hominy Swamp Creek Watershed Assessment and Restoration Plan, Pg 24

Per the North Carolina Stormwater Design Manual bioretention SCMs are one of the most effective SCMs for removing pollutants, because they use many different pollutant removal mechanisms, including infiltration, absorption, adsorption, evapotranspiration, microbial action, plant uptake, sedimentation, and filtration. Bioretention SCMs will be designed to include internal water storage, which is beneficial for the denitrification of nitrates. These pollutant removal elements will directly benefit the impaired Hominy Swamp which is directly downstream of these SCMs and the Neuse River estuary which is also impaired and further downstream. Stormwater wetlands are constructed systems that mimic the functions of natural wetlands and use physical, chemical, and biological processes to treat stormwater with similar benefits to bioretention SCMs. The nature-based SCMs that are part of this project will also provide water quality benefits. Implementing these SCM is consistent with the Hominy Swamp Creek Watershed Assessment and Restoration Plan as shown in Figure 7 and Hominy Swamp Category 4b Plan, which will directly benefit this impaired stream.

Existing and Potential BMP Implementation:

Multiple opportunities for BMP implementation, both agricultural and stormwater, were identified during site visits with local resource professionals. NRCS and SWCD have been actively cataloging benefits of agricultural BMPs throughout the county. Within City limits, retrofit opportunities on publicly-owned or unbuildable lots are of primary interest. Focusing on small-scale retrofits in the headwaters and mid-watershed would provide needed water quality improvement (particularly nutrient removal) while utilizing existing EEP in-lieu fee financial resources earmarked for riparian buffer restoration and nitrogen control. Stormwater wetlands are one type of BMP that may receive high priority for use of EEP in-lieu fee resources (i.e., nutrient offset payments received by EEP).

Figure 7 – SCM Recommendations from Hominy Swamp Creek Watershed Assessment and Restoration Plan, Pg 34

Line Item 2.B.1. – Increases public safety ... flood events (15 points)

The Fire Station SCM at the Headquarters Fire Station on Hines Street is critical infrastructure for the City's public safety. The physical location of the fire station and surrounding topography result in the station being flooded during heavy rain events impacting the ability of the Wilson Fire Department to respond from the station to emergency situations during those events. The Fire Station SCM will provide stormwater storage and reduce the frequency and depth of flooding to the fire station. This fire station is specifically designated as High Priority in the Hurricane Matthew Resilient Redevelopment Plan as shown in Figure 8. The fire station and address is shown in Figure 9. Excerpts from the Hurricane Matthew Resilient Redevelopment Plan are provided in Attachment 6. Albert L. Alston Jr, Fire Chief for the City, also provided a memo advising of the flooding situation at the Headquarters Fire Station in Attachment 7.

Infrastructure Action 1: HQ Fire Station and EOC

County: Wilson

Priority Grouping: High Priority

Priority Ranking: 1

Project Timeframe: 12-24 Months

Location: Headquarters Fire station at 307 Hines St W and City of Wilson Operations Center is located at 1800 Herring Avenue.

Project Summary: The physical location of the fire station and surrounding topography result in the station being flooded as a result. The City of Wilson Emergency Operations is the main distribution point for the City of Wilson utility and heavy equipment mobile resources. The waterway adjacent to this address floods and causes access problems to and from this site. This location also serves as the City of Wilson Emergency Operations Center and the back up 911 Communications Center.

Figure 8 – Hurricane Matthew Resilient Redevelopment Plan

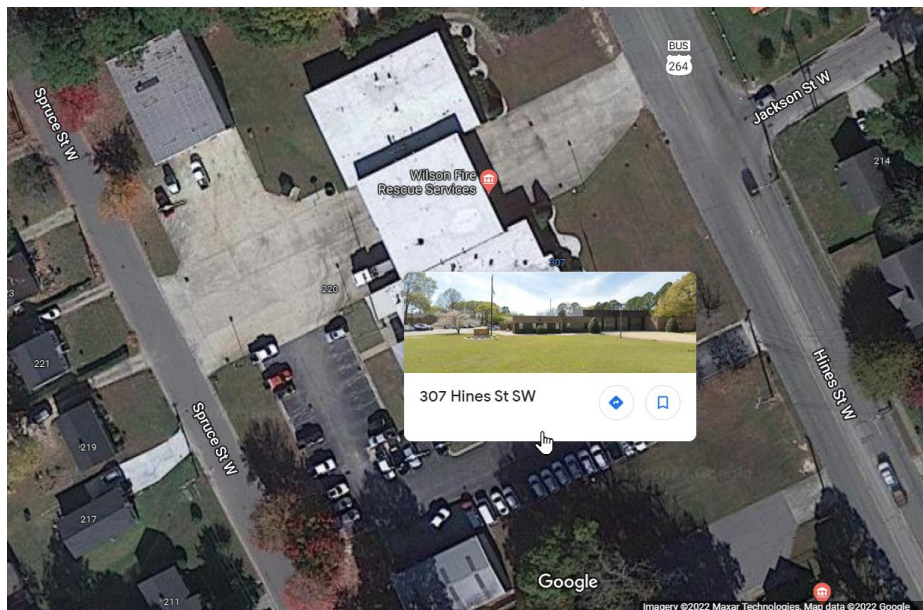


Figure 9 – Location map of fire station at 307 Hines St; source Google Maps

Line Item 2.D. – Project has been identified through a planning process (3 points)

Hominy Swamp planning includes a series of plans that are all interrelated to address issues in Hominy Swamp due to impairment and flooding resiliency. These plans include:

- Category 4b Plan, Hominy Swamp Restoration Plan, 2018
- Hurricane Matthew Resilient Redevelopment Plan, May 2017
- Hominy Creek Greenway and Water Quality Plan, 2016
- Floodplain Mitigation Plan, 2015
- Hominy Swamp Master Plan, 2006
- Hominy Swamp Creek Watershed Assessment and Restoration Plan, 2004 (North Carolina Department of Environment and Natural Resources Ecosystem Enhancement Program)

Water quality and water quantity issues are discussed specifically for Hominy Swamp throughout these planning documents. In these planning documents listed above, SCMs that address water quality and water quantity are referenced as watershed needs along with targeted areas. These general SCM recommendations for targeted areas are part of a series of adoptive plans that provide the City flexibility to implement the plan as SCM opportunities present themselves. The City has a history of implementing SCM retrofits, such as Marymount Park and green alleys and is working with North Carolina State University on the siting of two more SCM retrofits. Figures 10 and 11 provide examples of SCM recommendations from these plans.

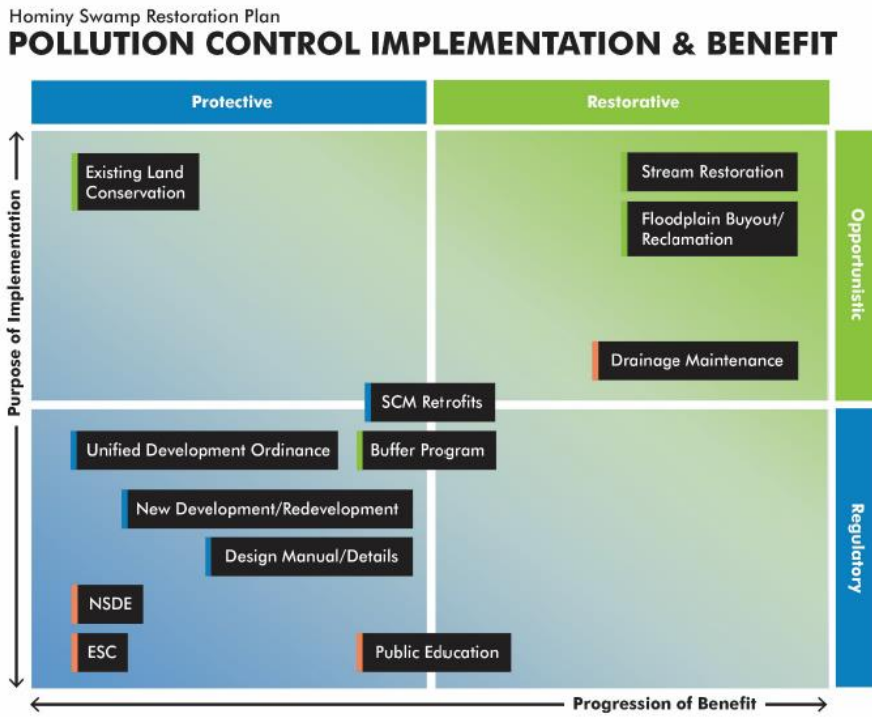


Figure 10 – SCM Retrofits recommendation from planning documents



The greenway will connect to existing uses, including neighborhoods, parks, and recreation facilities in Wilson.

PROJECT OPPORTUNITIES

- The corridor offers numerous connections to adjacent existing parks and public use
- Many stormwater retention possibilities exist along both sides of Hominy Creek
- South of Warren St., there are opportunities for the greenway to loop
- There is opportunity for a rail with trail beneath Tarboro Rd. due to the short track that is seldom used
- Tobacco flavoring industrial site at Tarboro Rd. floods often, and a land swap with the City is a possibility
- Large stormwater retention possibilities exist east of Hominy Creek between Norris Park, Ridgewood Park, and the existing storage facility

Figure 11 – Project Opportunities from Hominy Creek Greenway and Water Quality Park Master Plan, Pg 42

Some projects are specifically referenced in these planning documents. Starmount SCM is identified in the Hominy Creek [Swamp] Greenway and Water Quality Park Master Plan. In the Hominy Creek Greenway and Water Quality Park Master Plan there are a series of potential projects along the Hominy Creek Greenway and Water Quality Park Master Plan's project corridor. Individual projects within the master plan are presented in both specific projects and general project needs such as SCMs that address core issues such as water quality and water quantity that would be implemented as opportunities arise. Figure 12 shows a proposed wetlands park where the Starmount SCM will be located. The Hominy Creek Greenway and Water Quality Park Master Plan was adopted by the City Council July 2016 (see Back of Cover Page on plan and council minutes both included in Attachment 8).



Figure 12 – Hominy Creek Greenway and Water Quality Park Master Plan Starmount Circle Wetland Park SCM

As discussed under Line Item 2.B.1., the Hurricane Matthew Resilient Redevelopment Plan specifically references the flooding issue at the Headquarters Fire Station on Hines Street. This project is specifically designated as High Priority in the Hurricane Matthew Resilient Redevelopment Plan as shown in Figure 8 in Line Item 2.B.1. Excerpts from the Hurricane Matthew Resilient Redevelopment Plan are provided in Attachment 6.

Line Item 2.F. – Includes a public education component such as signage (1 points)

Given the extensive planning and public input for the Hominy Swamp watershed, the City will provide signage that describes the function of the proposed project, located at the site of the project that acknowledges the source of the project funds as ARPA LASII funds including information to help educate the public about the stormwater quality and/or stormwater quantity issue that the proposed project will resolve consistent with the adopted watershed plans.

Line Item 3.A.1. – Applicant has developed a local watershed plan (5 points)

Hominy Swamp planning includes a series of plans that are all interrelated to address issues in Hominy Swamp due to impairment and flooding resiliency. These plans include

- Category 4b Plan, Hominy Swamp Restoration Plan, 2018
- Hurricane Matthew Resilient Redevelopment Plan, May 2017
- Hominy Creek Greenway and Water Quality Park Master Plan, 2016
- Hominy Swamp Creek Watershed Assessment and Restoration Plan, 2004 (North Carolina Department of Environment and Natural Resources Ecosystem Enhancement Program in conjunction with the City)

This planning effort began in 2004 and continues with the City implementing measures which include additional SCMs to address the Hominy Creek watershed. The extensive planning effort of multiple plans is essentially one overall planning effort but includes specific plans to address specific issues and the implementation of actions to improve the watershed. This planning effort began before the 2004 Hominy Swamp Creek Watershed Assessment and Restoration Plan and continues with the Hominy Swamp Category 4b Plan. The Starmount SCM is shown in the Hominy Creek Greenway and Water Quality Park Master Plan as the Wetland Park along Starmount Circle (see Figure 12 – Hominy Creek Greenway and Water Quality Park Master Plan Starmount Circle Wetland Park SCM under Line Item 2.D) on Page 57. The Hominy Creek Greenway and Water Quality Park Master Plan was adopted by the City Council July 2016 (see Back of Cover Page on plan and council minutes both included in Attachment 8). The Hominy Swamp Creek Watershed Assessment and Restoration Plan was adopted by DEQ and approved by EPA.

Line Item 3.B. – Applicant has a current Stormwater Capital Improvement Plan (2 points)

The City currently has an approved 5-year (i.e., 2023 through 2027) stormwater capital improvement plan (CIP) that was adopted by the City Council on September 15, 2022. A copy of the CIP is found in Attachment 9. The CIP will be further developed to consider water quality, quantity, and age and condition of existing infrastructure. The Elizabeth Street Regional SCMs (SW-08) and the Fire Station SCM (SW-13) are specifically shown in the CIP. Note the Fire Station SCM project is entitled Hines Fire Department Flood Reduction Project in the CIP since the Headquarters Fire Station is located on Hines Street. Both projects are shown beginning (design and other pre-construction aspects) in 2023 in the CIP.

Line Item 3.C.1. – Applicant has established a Stormwater Utility with a Stormwater Enterprise Fund (5 points)

The City does have a stormwater utility and associated stormwater enterprise fund. Attachment 5 – Documentation of Stormwater Utility provides the resolution and excerpts of the FY2021 Annual Comprehensive Financial Report related to the Stormwater Enterprise Fund. The stormwater management fund was created in 2002. The first fees were collected on July 1, 2002. The following links provide more information on stormwater information, rates and fees, and the official record (i.e., fiscal year Annual Comprehensive Financial Report or ACFR) on revenues and expenses.

- [Stormwater and Erosion Control | Wilson, NC \(wilsonnc.org\)](http://wilsonnc.org)
- [Rates and Policies | Wilson, NC \(wilsonnc.org\)](http://wilsonnc.org)
- [Annual Comprehensive Financial Report | Wilson, NC \(wilsonnc.org\)](http://wilsonnc.org)

Line Item 4.B.5. – Local Government Unit (LGU) Indicators (12 points)

Wilson exceeds all five state benchmark indicators of disadvantaged areas (Figure 13). Attachment 10 – LGU Indicator Calculator for Stormwater Funding Eligibility documents the indicators.

Indicator	Wilson	State Benchmark		Exceeds Benchmark
Population Change	-0.50%	<=	4.48%	Yes
Poverty Rate	23.2	>=	14.0	Yes
Median Household Income	\$43,126	<=	\$56,642	Yes
Unemployment Rate	8.6	>=	7.1	Yes
Calculated Prop. Val. per Capita	\$88,067	<=	\$125,015	Yes

Figure 13 – Summary of North Carolina benchmark indicator of disadvantaged areas

Line Item 4.C. – Project benefits disadvantaged areas (10 points)

This project consists of three different SCMs in the Hominy Swamp watershed. All three SCMs will benefit disadvantaged areas in Wilson as shown in the DEQ Community Mapping tool (see Figure 14 that shows each SCM in an area shown as underserved. These SCMs will benefit this underserved area by improving water quality, improving public safety, and reducing flooding impacts. In addition, the City exceeds five of five LGU indicators as documented under Line Item 4.B.5. These indicators are also disadvantaged factors and further highlight the benefit.

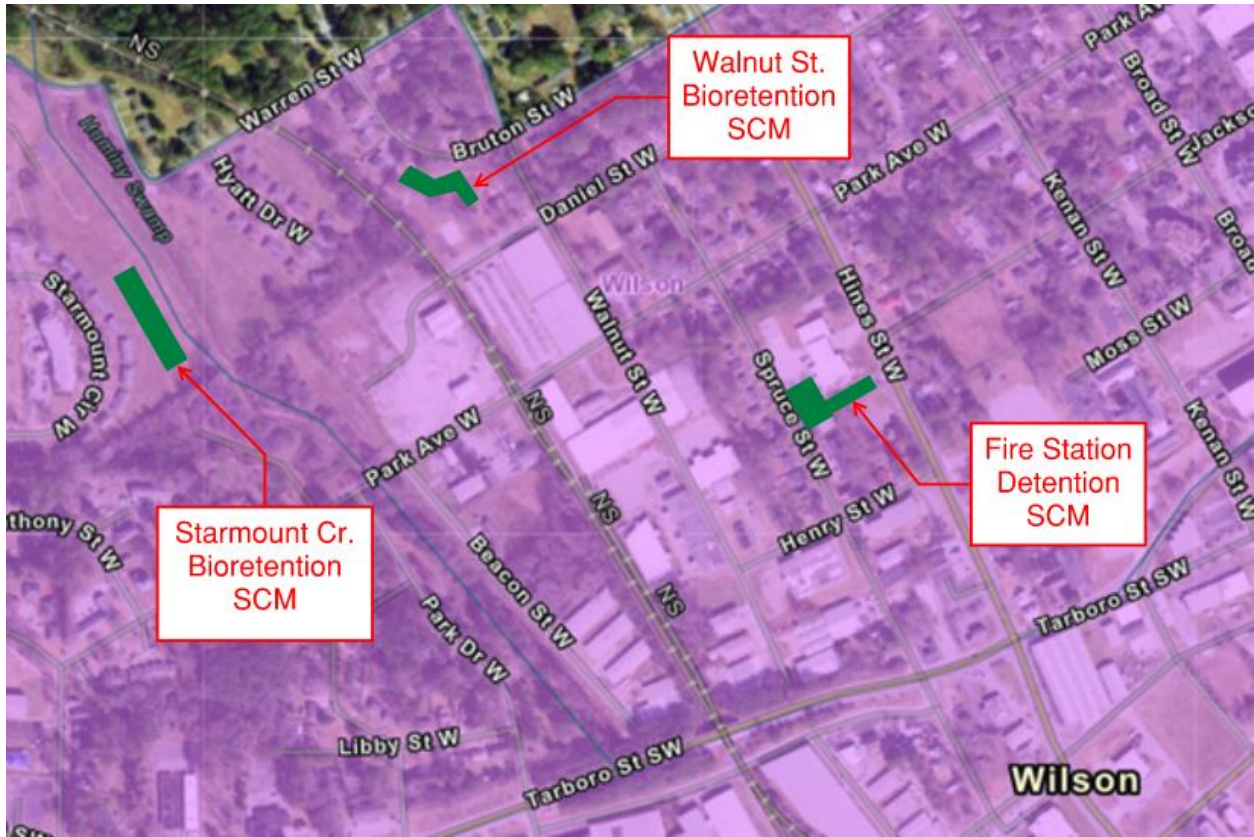


Figure 14 – Location of project within disadvantaged area source DEQ Community Mapping tool