

# CITY of ANGELS

Mayor  
WILLIAM HUTCHINSON

Vice Mayor  
GEORGE MIDDLETON

Councilmembers  
LEE SEATON  
PAUL RAGGIO  
NORM PRICE



Incorporated in 1912

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City Administrator  
TIM SHEARER

City Engineer  
WEBER/GHIO

City Attorney  
RICHARD MATRANGA

SSO Hearing: 2/8/06

January 25, 2006

Tam Doduc, Chair, and Members  
State Water Resources Control Board  
P.O. Box 100  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**SUBJECT: Comment Letter – 2/8/06 Public Hearing for SSORP  
General/Technical Comments**

Dear Chair Doduc and Members:

We agree with the overall objective of eliminating sanitary sewer overflows (SSOs) but respectfully request the new Wastewater Discharge Requirement (WDR) not be imposed in its current form on small facilities such as Angels Camp. The comprehensive WDR is far beyond the scope of what is reasonable and necessary for smaller facilities. We are being effective in eliminating SSOs without this additional layer of requirements and bureaucracy.

We are extremely proud of the substantial improvements we have made to our collection system operations and maintenance over the past 10 years. As an historic gold rush town we had pipes dating back 80 years or more with numerous problems that periodically resulted in SSOs. The city council began raising rates nearly a decade ago to aggressively attack these problems.

The city has conducted smoke and dye testing of the entire system, disconnected storm water taps, replaced miles of sewer lines, developed simple but effective preventive maintenance programs, worked collaboratively with our risk management authority to improve worker safety, sent employees to numerous technical and safety training classes, implemented a 24/7 overflow emergency response plan, fielded new maintenance equipment, and many more programs and procedures to improve the way we do business and protect our environment. We are now in discussions with the Calaveras County COG

regarding placing our 27 miles of sewer line in the new GIS system as yet another improvement in the way we manage our system. We are raising the bar on ourselves to provide a system that is safer, more effective and right for OUR community and the environment.

The wastewater ratepayers of Angels Camp cannot bear the economic impact of the proposed WDR. The economic impact analysis is flawed and fails to take into account many variables not the least of which is the exponential impact of both development and implementation of the new requirements on small communities such as Angels Camp. With so few ratepayers any additional costs dramatically impact rates. Angels Camp residents are at the 77% income level compared to the California State's Median Household Income. Further complicating our situation is the rural mountainous area in which we live that provides no viable opportunities for consolidation to gain any economies of scale.

We should not be penalized for a few "dead beat" organizations that must be forced into compliance. The WDR as it applies to smaller entities is far beyond what is necessary to effectively control SSOs. It is if you will, a Cadillac – we can only afford a used, beat up, but mechanically sound Chevrolet, but both cars will get you from A to B. Understanding the importance of having some minimum standards maybe there could be a scaled down version of the WDR for communities such as Angels Camp, a "WDR Lite" for lack of a better term. For example, the major development and implementation costs imposed by the draft WDR are associated with development of an Operation and Maintenance Program and a System Evaluation and Capacity Assurance Plan. Although development of these plans to the level of sophistication required by the draft WDR may make sense for large systems as found in urban areas they are inappropriately complex for small systems such as found in the rural foothill communities.

We hired ECO:LOGIC, a consulting engineering firm, to do an economic analysis on what it will cost our city to develop and implement the system the way this new WDR will require. Listed below, using the format of the DRAFT 12/5/2005 – State Water Resources Control Board, Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies are the elements of compliance as summarized in "C. Provisions, Section 13, Sewer System Management Plan (SSMP), Subsections (iv) thru (xi)" and the corresponding estimated costs for Angels Camp:

- (i) Goals:
- (ii) Organization:
- (iii) Legal Authority:

(iv) Operation and Maintenance Program:

This effort will require an initial capital expenditure that will probably have to be financed. It will have to include: Mapping, inventories, preventive maintenance program, training, equipment, replacement part inventory:

Develop

\$300,000 to \$400,000

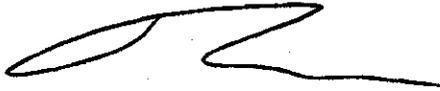
	Implement	\$90,000 to \$140,000 per year
(v)	Design and Performance Provisions: This effort will require a revamp of current design and construction standard and testing and inspection procedures.	
	Develop	\$20,000 to \$30,000
(vi)	Overflow Emergency Response Plan:	
	Develop Plan	\$20,000
	Implementation	\$20,000 per year
(vii)	Fats, Oils and Grease (FOG) Control Program:	
	Develop Plan	\$30,000
	Implementation	\$10,000 to \$20,000 per year
(viii)	System Evaluation and Capacity Assurance Plan:	
	Evaluation and Plan	\$100,000 to \$200,000
	Implementation	\$60,000 per year
(ix)	Monitoring, Measurement and Program Modifications:	
	Implementation	\$20,000 to \$30,000 per year
(x)	SSMP Program Audits:	
	Implementation	\$5,000 to \$10,000 per year
(xi)	Communications Program	
	Implementation	\$5,000 to \$10,000 per year

A summary of the above costs indicates that development of all necessary programs, systems and procedures will cost the City between \$470,000 and \$680,000 over the time schedule provided in the draft WDR. The annual cost to implement the new requirements will cost between \$210,000 and \$290,000 per year.

The state estimates the annual cost to implement the new requirements to be approximately \$72 per connection per year, which equates to approximately \$173,000 total per year for the City's 2400 equivalent residential customers. Our estimate, of between \$210,000 to \$290,000 per year indicates this cost will actually be between \$87.50 to \$120.83 per connection per year for just the ongoing implementation costs. The \$470,000 to \$680,000 development costs equals a total of \$195.84 to \$283.34 per equivalent connection. The City will likely have to finance this amount – assuming 5 years at 6% interest, that adds another \$45.44 to \$65.74 annually for the first five years. The estimate in the state's economic analysis indicates the "manageable sum" of \$5.99 per month but in actuality it will cost the residential ratepayers of Angels Camp an additional \$11.08 to \$15.55 per month.

Should you decide to impose the WDR or even a "WDR Lite" on small communities that cannot afford the "Cadillac" it would be imperative that additional ongoing funding be provided as communities such as ours will not be able to bear the additional financial burden without substantial outside funding. We are continuously raising our rates to meet more and more state requirements, increases in costs of materials and supplies, costs of training and additional compensation for increased levels of certification and skills, inflation, and the replacement costs of an aging system. Our community cannot afford the dramatic increase in rates that will be necessary to develop and sustain the proposed requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Shearer', with a long horizontal flourish extending to the right.

Tim Shearer  
City Administrator