

Stacey Gotham  
Water Resources Control Engineer  
Central Valley Regional Water Quality Control Board  
Redding Branch Office  
364 Knollcrest Drive, Suite 200  
Redding, Ca. 96002

Re: City of Dunsmuir NPDES No. CA0078441  
WWTP City of Dunsmuir

Dear Ms. Gotham,

I am a current member of the Dunsmuir City Council. As a Councilmember, I wish to comment on your proposed order R5-2012-XXXX NPDES No. CA0078441, which I will refer to as the City's Waste Water Treatment Permit, or Permit.

I appreciate the Board's willingness to help Dunsmuir through the process of updating its Permit, as well as its collection system.

The update has created a huge chasm within the citizens of Dunsmuir.

Dunsmuir's population has been in decline for decades, and is currently at some 1650 residents.

The median household income is 29,000 dollars.

Dunsmuir is an economically disadvantaged community.

The current City Manager, Brenda Bains, applied for a grant to upgrade our WWTP, as well as the collection system and was awarded the money to address many of your concerns.

Pace Engineering has been helping us with this project. It is my understanding that you are in receipt of their comments, via Tom Warnock.

I would like to put your new Permit in perspective. We have a total budget of some 3 million dollars. About 5 dollars a day per person. We need to make sure they have water, can flush their toilets without them backing up, have their trash collected, and have their streets and sidewalks lit at night. Stray dogs and cats chased and caught. Tree limbs lopped before they crush a car.

I know I haven't covered it all, but I'm just trying to make my point.

If you look at Pace's PER, there is one sentence in one paragraph that basically says that if I & I is not addressed on private property, the overall I&I will not be significantly reduced.

So in addition to raising the sewer rates, this City Council now has to work with the property owners on their laterals. (As we always said would be the case).

I believe as a property owner in Dunsmuir, as well as a Council Member, that the I & I problem has to be addressed.

I am also painfully aware that 600 households are below 29,000 dollars a year in income. Probably hundreds of households are below 1,000 dollars a month in income.

The current Sewer Rate, coupled with the I&I repairs to private sewer laterals will place an economic burden on many households.

Just because we determine that the laterals need to be replaced doesn't mean that our residents will be able to pay for it. If their wallets are empty, they're empty. They can't run next door to the neighbor to ask to borrow the money, because that neighbor is in the same situation.

Dunsmuir has 1600 residents. It needs 3500. In 80 years, the town has not had the need for a stop sign or a traffic light on its main street. It has not grown, as it needs to do.

Dunsmuir would like to outgrow its economically disadvantaged status. It may be in a position to do so in the immediate future.

Pressure from the RWQCB in the form of more stringent regulations as well as increased costs for monitoring purposes is untimely and unaffordable for Dunsmuir. The Board's recommendations for TuL monitoring, Ammonia and Nitrates as COEC's, and their resultant costs to the City of Dunsmuir are untenable.

Dunsmuir's discharge to the Upper Sacramento River are one one thousandth that of the City Sacramento. Sacramento is struggling with your new paradigm and they discharge over a thousand times the volume that Dunsmuir discharges.

I respectfully object to all of the RWQCB findings with regards to our Plant.

I wish to discuss them with the Board, along with Nick Mitchell, another Council Member, as well as Pace Engineering.

I know we can come to an understanding whereby the City of Dunsmuir will not be costed out of existence.

I wish to note that this letter was written and signed on August 23, 2012, and was sent to the RWQCB in Redding, Certified, proof of delivery, with the US Postal Service on Friday, August 24, 2012. This date is prior to the end of the comment period as set forth by the RWQCB.

Sincerely,



Chris Raine  
Dunsmuir City Council member

cc: Brenda Bains, Tom Warnock, Jim Nielsen