

Attachment D to ACL Order R5-2020-0553
Shasta County Service Area No. 17 Cottonwood (CSA 17)
Description of Enhanced Compliance Action (ECA)

1. **Project Title:** CSA 17 Collection System Improvement Project – Additive Alternative A, Replacement of Deficient Pipeline and Raising of Manholes
2. **Service Area:** CSA 17
3. **Name of Responsible Entity:** Shasta County
4. **Estimated Cost for Project Completion:** Replacement of an existing 12-inch deficient wastewater collection pipeline, as well as raising up two manholes that frequently backup and nearly overflow has an estimated construction cost of at least \$65,000 based upon similar prevailing wage rate public works projects recently constructed in the north state incremented by the Engineering News Record Construction Cost Index, which stands at 11,418 for May 2020. This cost does not include environmental, design, or construction management fees nor staff costs associated with engineering design support and project management. Hence the cost will far exceed the \$60,000 in suspended liabilities.
5. **County Contact Information:** Troy Bartolomei, Deputy Director - Operations
Shasta County Department of Public Works
1855 Placer Street
Redding, CA 96001
530-245-6827
tbartolomei@co.shasta.ca.us
6. **Project Goals and Description:** The CSA 17 Collection System has documented areas subject to infiltration and inflow (I&I) and sags as indicated by closed circuit television (CCTV) inspection of the entire system. The CSA 17 Collection System Improvement Project for which grant funding has been obtained will address many of these issues. The goal of this project is to add to the currently planned scope of the Collection System Improvement Project to replace a deficient pipeline with sags and raise manholes that contribute I&I and cause wastewater backups with the potential to result in sanitary sewer overflows (SSOs). An existing section of 12-inch pipeline is known to be in a problem area where backups and overflows have threatened to occur. As such, Shasta County now desires to add this section of pipeline to the scope of the previously planned Collection System Improvement Project. Refer to attached Figure 1 for a map of the CSA 17 Collection System showing improvements to be completed as part of the grant-funded project in red, as well as improvements added to the scope to be paid for by County funds as part of this ECA in orange. All improvements will reduce system I&I, sags, and other pipeline deficiencies to increase pipe capacity and reduce occurrences of backups and SSOs.
7. **Water Quality and Beneficial Uses:** The CSA 17 Collection System sends all wastewater to the CSA 17 WWTP, which discharges to Cottonwood Creek, a

water of the United States and tributary to the Sacramento River. The Sacramento River Basin Plan defines the following beneficial uses for Cottonwood Creek as follows:

Existing:

- Municipal and domestic water supply (MUN)
- Agricultural irrigation and stock supply watering (AGR)
- Water contact recreation including canoeing and rafting (REC-1)
- Other non-contact water recreation (REC-2)
- Warm freshwater habitat (WARM)
- Cold freshwater habitat (COLD)
- Cold migration of aquatic organisms (MIGR)
- Spawning, reproduction, and/or early development, warm and cold (SPWN)
- Wildlife habitat (WILD)

Potential:

- Industrial process supply (PROC)
- Industrial service supply (IND)
- Hydropower generation (POW)

Many drainages within the CSA 17 Service Area Boundary also eventually flow to Cottonwood Creek. As such, any SSOs that occur within the area have the potential to reach Cottonwood Creek. Reduction of system I&I, sags, and other pipeline deficiencies will increase pipe capacity and reduce occurrences of backups and SSOs. This will result in improved water quality in Cottonwood Creek for all beneficial uses.

8. Confirmation that the Compliance Project Contains Only Measures that Go Above and Beyond Applicable Obligations of the Discharger: Shasta County is under no prior obligation to complete the above-described pipeline and manhole improvements. These improvements exceed regulatory requirements and therefore qualify as an ECA.

9. Demonstration that the Compliance Project Does Not Directly Benefit, in a Fiscal Manner, a Water Board's Functions, Its Members, or Its Staff: The project does not directly benefit, in a fiscal manner, the Water Board's functions, its members, or its staff. The project is not a conflict of interest for the Water Board.

10. Project Schedule, Milestones, and Deliverables: The CSA 17 Collection System Improvement Project Funding Agreement was executed on 5 March 2020. Per the Funding Agreement, construction of the project must be completed no later than 31 March 2023. As such, construction of the improvements described in Item Number 6 above will be completed by this date. The improvements specific

to this ECA are anticipated to be a separate bid line item for ease of project tracking from the remaining project components.

Shasta County is responsible for providing all deliverables described below:

Deliverables:

Progress Report: Shasta County will submit a progress report including, at a minimum, updated construction photographs, a summary of budget expenditures to-date, and a summary of the status of the pipeline section and manhole improvements described in Item Number 6 above.

Due Date: Quarterly, until construction of the pipeline section and manhole improvements are complete. Reports are due two weeks from the end of each quarter, i.e. Quarter 1 due April 14th, Quarter 2 due July 14th, Quarter 3 due October 14th, and Quarter 4 due January 14th of the following year.

Final Report: The final report will document that the ECA has been completed, will include a summary of all completed tasks, and will have an accounting of all expenditures. The accounting will clearly show whether the final cost of the successfully completed ECA was less than, equal to, or more than the suspended liability amount of \$60,000. The following statement will be included above the signature line of the report: *"I certify under penalty of perjury that the foregoing is true and correct."*

Due Date: Two months after completion of construction of the pipeline section and manhole improvements, but no later than 31 May 2023.

11. Reports to the Water Board: Shasta County shall submit all deliverables, reports, and accounting invoices pertaining to this project to the Central Valley Water Board, Redding Office.