

This may be distributed.

Comments on First Sewer Meeting

10/31/16

The sewer moratorium meeting Monday night was a preliminary discussion for the meeting on Tuesday night, November 1, 2016. Neither the engineering firm nor city attorney were present, and the public give no input. However, the information given at the meeting was frightening for Moabs future.

1. The engineering firm Bowen Collins memo to Moab City clearly states: It is our opinion that no additional treatment capacity is available at the existing WWTP.

2. The Equivalent Residential Units (ERU) on the Priority List that will be exempt from the moratorium is 800 to 1000. An ERU is estimated to produce 4400 gals per month of sewage. ERUs are a better method to measuring growth than connections. A large hotel is equivalent to several hundred homes in usage of sewer and water resources.

An increase of 1000 ERU in current development is a growth rate of approximately 10%. This growth rate, if it continues, will increase the demand on our sewer system by 100% in about 7 years. Note this will also increase demand for culinary water by 100%. Does Moab have sufficient water for a 100% increase in demand in 3 or 4 years? Does Moab have water and sewer for a University which will probably be over a 1000 ERUS? The subject is never discussed by the County or the City.

3. The City placed the blame for the current debacle on their prior engineering firm and prior city administrators, who, they say, gave inaccurate information to the council. GWSSA recognized the lack of sewer capacity in approximately 2007 and placed a moratorium on sewer connections at that time. The effort to build a new plant in 2007 failed because the City did not participate in the effort.

4. The new plant will destroy critical habitat in the Matheson Reserve area for the rare Yellow Bill Cuckoo. The USF&W is monitoring for nesting in the area and a nest could delay the plants construction for several months per year.

5. The City and County leadership does not have the education or experience to make informed decisions on the problems associated with a 10% growth rate per year in demand for additional infrastructure in Moab. A strong moratorium on future growth will give the leadership an opportunity to hire professional help to provide much needed knowledge about unlimited growth.

6. There was a small glimmer of hope at the end of the meeting. The sewage from the Parks and the BLM is almost 1300 ERUs. There is a possibility that this sewage can be transported to Price

and Monticello.

7. The city has extended the construction period from 18 months up to 24 months. The plant may not be completed until 2019.

The County and City are allowing developers many additional units if the developers a small number of affordable houses. The County and City must consider the consequences from the thousands of new additional units and the demand for services from the thousands of houses that come with the few affordable houses. We can expect more debacles unless the County and City control the unlimited growth in our small valley.

**Attends Tuesdays night meeting**

Bill love

## Second Meeting on Sewer Plant Moratorium

The second meeting on the sewer moratorium was dominated by local and out of area developers with nobody speaking for the moratorium. The council approved the motion to table the decision indefinitely which would have essentially killed the moratorium. A second motion to table the decision until the Tuesday meeting was passed.

The presentation by the consulting firm Bowen Collins included the following:

1. Chemical treatment of the influent to the existing plant would be the most economical way to increase capacity. The cost is approximately \$3,000 per month. However, successful treatment would require three month of testing. The firm assured us that the chemicals would not be toxic to aquatic life. Since the Mill Creek outlet to the Colorado River is a nursery for endangered fish the USF&W needs to review the toxicity of the chemicals and their application.
2. Filtering of the effluent may also help. The cost would be \$400,000 to \$500,000 for the next two years. This cost would not include maintenance.

The effort to kill the moratorium by tabling the resolution is very disturbing. The problem with the sewer capacity of the plant has been known for many years, GWSSA placed a moratorium on sewer connections around approximately 2007 and looked at developing a new plant. Moab City would not participate and the moratorium was removed.

A. Moab City today has a plant that cannot meet current demand and is discharging illegal effluent into the Colorado River

B. Moab City has 800 to 1000 ERUs that have been approved for connection to the plant. These ERU's can probably be connected if sewage is no longer accepted from the parks and BLM in our area. A moratorium is necessary for at least three months to provide time for Bowen Collins to test the feasibility of using chemicals to reduce illegal pollution in the Colorado River and to protect Moab City from promising sewer service that they cannot currently provide

C. The State of Utah, USF&W and EPA have tolerated the City's illegal discharge because of Moab's efforts to control the discharge and their effort to construct a new plan. No moratorium or a weak moratorium could be considered a willful pollution of the Colorado River. **I can guarantee that all the above agencies will be asked to enforce their regulations and to require a complete moratorium on all new connections until the new plant is completed.**

*Bill Love*