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To: City Council <citycouncil@cityofsebastopol.gov>; Mary Gourley <mgourley@cityofsebastopol.gov>

Sent: Sunday, September 13, 2026 at 12:20:46 PM PDT

Subject: Public Comments Sewer System Management Plan

Hi all,

The Sewer System Management Plan appears to have some text carried forward from 2005 that is no longer appropriate and some text that contradicts itself.

There were commitments identified in 2020 that were not met. There are audit findings that are only marginally compliant. There are several important issues identified in the report that should be discussed at the EFOC and follow-up actions established to ensure compliance in the future.

We have a new Director of Public Works that seems to be better managing the operation. However, commitments made to the State or indeed critical issues and programs should not be just trusted to the department or the City Manager's oversight. As we have learned these positions change. New leaders then take time to get up to speed. There should be clear milestones established that are tracked regardless of who is City Manager or Director of Public Works.

Presently, the EFOC is the best venue to monitor the operation and these kinds of commitments. However, a process needs to be established to ensure critical commitments and milestones are identified and addressed at appropriately scheduled EFOC meetings. Documents such as this should be reviewed by the EFOC. This one was not.

Attached is a review of the changes in the plan from 2020 and issues that should be addressed going forward.

Lee

[REDACTED]

Is the 2026 Sewer System Management Plan Ready for Certification by City Council?

Once again, the city is pushing highly technical documents through the city council on the consent calendar. Although the document is largely boilerplate literally lifted from the 2020 report (sometimes by mistake) there are significant changes and findings that the City Council should be discussing and educating themselves about the Wastewater Enterprise that they oversee. You also of course have the option to refer this to the EFOC, a group you put in place to provide technical and financial oversight for the Enterprises.

The EFOC was formed for exactly this kind of task. Their meeting format allows for meaningful discussion by individuals with more knowledge of the sewer system and its operation. Items requiring follow-up belong in that group as well.

In this report there are several good signs of progress as Director Hart is getting her footing. Staffing is increased(?), annual cleaning appears to be on track, manhole/alarm/cover work has been completed, and ongoing CCTV and Smart Cover monitoring is being completed according to plan. Odd that the council has not heard of many of these accomplishments given that half your time is paid for by rate payers.

The SSMP, however, raises questions about audit findings, and work that was not completed as promised in the 2020 report. There are some internal inconsistencies in the report. These should be addressed before the council certifies the document to the State.

2026 Audit Findings

Audit findings should be of great interest to the City Council and the EFOC. The three findings that were considered Marginally Compliant should be addressed.

The City's own audit defines "Marginal Compliance (MC)" as compliance that "complies minimally with basic objectives of the WDR." The audit assigns MC ratings to three items:

Audit item	What the audit says	Source
Construction inspection requirements	City Standards do not include construction inspection requirements; the audit says these will be added in a future Standards update.	2026 Council packet pp. 183; staff report pp. 2–3
System capacity evaluation	The Sewer Master Plan is still being updated and is expected to evaluate hydraulic capacity and condition.	2026 Council packet p. 185
Capital improvement planning	The audit says the updated Master Plan will inform the FY 2027/28 CIP, and that a future SSMP update will include the finalized project list.	2026 Council packet p. 185

The first item is a concern because the 2020 SSMP already required procedures and standards for inspection and testing of new and rehabilitated sewer facilities, and the 2020 audit checklist specifically evaluated that requirement. Why, six years later, are construction inspection requirements still absent from the City's Standards and now rated only Marginal Compliance? Further compliance is required by Sebastopol Municipal Code §13.08.060(B) which requires **proper installation, testing, and inspection of new and rehabilitated sewers. This is something that should have been addressed by staff over the last 5 years. Given they have not been addressed, Council or the EFOC should set some deadlines for completion and a report back to the council.**

System capacity evaluation should have been an obvious priority as new development proposals accelerated two years ago. It was one of the first issues identified by the EFOC infrastructure committee and needs to be followed up as a council priority if the Sewer Master Plan shows there are issues.

The Sewer Master Plan was a priority established in the 2024 rate study. The deadline has now slipped to Spring of 2027. That is six more months. Why is it taking so long?

Capital Improvement in the Sewer system is critical and has been largely ignored for years. The last formal infrastructure study was done in 2005. Other piece meal work has been done since. For at least four years before the 2024 rate study the city and the City council allowed Wastewater Enterprise operated at a deficit, reportedly due at least in part to a billing system error. Although it was called to your attention by repeated public comments, no action was taken until the reserves were entirely depleted and the General Fund had to start paying expenses. During that time there was also little capital improvement work being done beyond emergency repairs.

Not discussed in this management plan is the fact that the old clay pipes are infiltrated with storm water during every rainy season. The additional rainwater is pumped to the Santa Rosa Treatment center. Energy costs are incurred by pumping rain- water and Santa Rosa charges by the volume for treatment.

With all the potential issues there appears to be no urgency to get the Sewer Master Plan completed. It is critical in part because the plan is needed to forecast future CIP costs in order to complete the planned new rate study and set appropriate rates for the next 4 years.

Key 2020-to-2026 failed commitments that should be reviewed by the EFOC if not the full council.

Below are commitments that were made in the 2020 SSMP that remain unresolved or ambiguously described six years later.

Topic	2020 SSMP	2026 SSMP	Concern / Council question
CMMS / work-order system	2020: City had “recently acquired” Cartograph SEMS and said asset inventory and work-order processing would be implemented “in the near future.” (2020 SSMP p. 29) City..will be using the new SEMS CMMS system discussed above within the next 2 years. (2020 SSMP p.31)	2026: 6 years later - “much tracking is still paper, field notes, spreadsheets and manual work orders”. “An asset-management/CMMS system is being implemented (p.36) but Elsewhere it says the City has “no formal” WO/CMMS but has selected and contracted for one. (2026 packet pp. 36, 38)	What happened to the SEMS CMMS system acquired in 2020? Was it implemented, abandoned, replaced, or never put into service? What did it cost, and what is the completion date for the current CMMS. There is no budget for a new asset management system, only \$5,000 for maintenance costs for one. Has the city been paying for one and not using it? It this deficiency is in the process of being addressed what are the milestones and when will EFOC/Council be updated? At the very least there are inconsistencies in the written report that should be addressed
Siphon maintenance	2020: Two siphons had never received direct maintenance; City said it would evaluate proper maintenance procedures within two years. (2020 SSMP p. 31)	2026: The same two siphons are still described as never having had direct maintenance; they are now said to be “periodically evaluated.” (2026 packet p. 38)	Was the promised two-year evaluation completed? If so, what did it recommend and why has no direct maintenance occurred? If the work has been done why is the report not updated?
Private sewer laterals	2020: River Watch settlement required the city to hold a public hearing and adopt a mandatory private sewer lateral inspection and repair ordinance. If the city did not adopt the ordinance the settlement required, the city to establish a \$50,000 revolving loan fund. . (2020 SSMP p. 35)	2026: Essentially the same obligation is repeated in the present tense. (2026 packet p. 43)	This is probably a copy of stale language from the 2020 report. The city council in 2021 chose not to adopt the required ordinance. Staff were directed to develop a financial assistance alternative. Staff proposed a \$50,000 from the Sewer fund be available to provide property owners up to \$2,500 toward private lateral replacement. The program is still described on the city website except it was scheduled to terminate June 30, 2025. Is the program still in operation? Was it left to expire without further analysis or comment. I can’t find any information on grants applied for. Are decisions being actively made and programs actively managed or as in this report, is the city just going through the motions.
Staffing	2020: 2.3 FTE allocated to sewer collection O&M. (2020 SSMP p. 30)	2026: 3.1 FTE allocated in FY 2025-26. (2026 packet p. 36)	This is a positive change. Council should confirm whether the additional staffing is sufficient to complete the deferred asset-management and maintenance commitments.
Condition-based maintenance	2020: City said it would move toward condition-based cleaning/CCTV frequencies using PACP and CMMS information.	2026: The plan still repeatedly describes condition-based maintenance as something the City will do “in the future.”	After six years, what specific milestones remain before condition-based scheduling becomes the normal operating method?
Master Plan / capacity / CIP	2020: Existing 2005 Master Plan and prior hydraulic work were referenced; a new five-year CIP was to be developed.	2026: SSMP text says the “2026 Sewer System Master Plan includes updates” to the hydraulic model through 2045. (2026 packet p. 66; staff report p. 1)	Understanding the capacity of the sewer system and the new demands being placed on it by developments like Canopy, Valentine projects (2) and up to two hotels is critical. Upgrades will take years and these projects are reaching completion now.

This is a regulatory management document that will replace the City's 2020 SSMP and be certified to the State. The Council should have a clear record that the document is internally consistent, that prior commitments are accounted for, and that unresolved audit findings are accompanied by specific corrective actions and schedules.

The Council should direct staff to provide the following to the EFOC:

- A written reconciliation of the three Marginal Compliance audit findings, including what remains to be done and firm completion dates;
- A status report on commitments carried forward from the 2020 SSMP, including CMMS implementation, siphon maintenance procedures, private-lateral program review.
- An explanation of what happened to the Cartograph SEMS system identified as already acquired in 2020. What was the cost. Why was it not implemented in the following 5 years. What is the implementation schedule.
- Confirm hydraulic modeling is taking place. Explore why the Sewer Master Plan is going to take yet another six months to complete?
- A clean revised SSMP in which the change log reflects substantive changes and stale or contradictory language is removed.
- A report on the volume of storm water being infiltrated, the cost of pumping and treatment. This will be critical when considering the cost to replace the old clay pipes. Is there an assessment of where infiltration may be the greatest thus making replacement more cost effective?