

January 12, 2009

To: Hailey City Council & Mayor
cc: Heather Dawson, Chief Chapman, Chief Gunter, Ned Williamson
From: Carol Brown
Re: Consolidated Dispatch

As promised at our last Council meeting, I agreed to put my thoughts to you in writing. Over the last two weeks in December, I took the opportunity to spend time with the Hailey police department including riding with an officer and attending a staff meeting. I also arranged through Blaine County to spend time in the dispatch center. Bob Greenlaw gave me a tour of the current facility, still located in the old jail building. Dispatch will remain there until Qwest is able to put in the correct phone lines in the new dispatch room located in the new jail. Bob also gave me a tour of the new dispatch facility after I had had time to absorb operations at the old site. My time spent with the Hailey police department and in the dispatch operations was invaluable to me better understanding emergency services. I am now better equipped to represent you in the consolidated dispatch discussions. Here are my thoughts:

1. Managing and Reducing Calls.

We have been consistently chastised and advised to manage and/or reduce our calls to dispatch. After spending time with police and dispatch, I challenge that assumption.

- a. Inefficient to Dispatch. Dispatch works most efficiently with the emergency services using them, not avoiding them.
- b. Unsafe for police officers. I over heard our police administrative assistant dispatching our police to an open container in a vehicle at a local business. I commented that I understood we needed to be doing more of this dispatching ourselves. The dispatchers pointed out to me that if they had not overheard that communication, they wouldn't know where the officer was should he suddenly call for help. They also have no way to track that call so reports won't show the true value of the policing been done.
- c. Indirectly imposes an inappropriate policing standard. We have been advised that our police must be using their vehicle laptops for administrative functions such as running plates. In some cities, using the laptops in the car to run plates may be the best policing method. This is a way to reduce calls. In other cities, it may be inappropriate and cause serious safety issues with the police officer. What works well in one city should not be imposed upon another city with different policing issues. By demanding that all police use the vehicle laptops, it is a way of imposing police standards inappropriately.
- d. Why reduce calls? The current dispatch system has considerable capacity for many years. Do we want dispatchers to sit without activity even more than they already do?

2. Model for payment system

There are several different models that could be used for payment into a Consolidated Dispatch system.

- a. Calls for Service (based on direct use of system)
- b. Percentage of City/ County emergency budgets (addresses affordability issue for each entity)
- c. Dwelling Units (represents the maximum potential of need for Dispatch if all units were occupied –indirectly this is an impact model)
- d. Population (addresses impacts. More people = more calls)

Applicable to any Model is a Need/ Request from the City of Hailey for a graduated fee payment. This FY2009 operating budget was reduced 10% over the previous year. Based on first quarter revenues to date (Dec. 31, 2008), we are anticipating needing to reduce even more. Under any fee model, we will need to ask for a graduated payment system spread out over three years. (e.g. 2010 increased fee, 2011 increased fee; 2012 full fee). This request is based on our known expenditures as well as allowing us to not dramatically cut programs in one year. It also gives a better opportunity to communicate with our citizens about the necessary cuts.

3. Dispatch configuration

- a. I support the 13 dispatchers. I am basing that on my time spent in dispatch, observing very quiet times and very busy times. I am also relying upon the expertise of Bob Greenlaw.
- b. Technology does reduce the need for dispatchers. It is important we don't get caught chasing technology – that can be expensive. But there is a direct correlation between good technology and an efficient dispatch system that saves us money.
- c. We should consider requesting the dispatch be moved under the Sheriff. The dispatch will be physically located inside the jail in a matter of months. The Sheriff has many employees under his supervision and can add some flexibility and support to the dispatchers during true emergencies (e.g. Whiskey Jacques fire, etc.).
[As a side note on the Sheriff, could the portion of the sheriff's payment to dispatch be paid from the E-911 line, reducing the county general budget and allowing either more CAD support or more technology?]

Recommendations

- Support Consolidated Dispatch at 13 personnel
- Request Graduated fee payment
- Tentatively support Dwelling Units. I say this without having exact figures in front of me. I know we have no ability to pay the User Fee Model requested of us.

I know how worried we all are about needing to reduce our budget even more this fiscal year. And under next year's projections we can anticipate even further reductions. It is difficult to know where these reductions will come from since we thought we had already cut to the bone. Our Local Option Tax is up for vote in 2010 and it is not certain if the voters will reauthorize it.

Given our known financial realities, where we must stretch a smaller budget to serve a considerably larger population, one key concept that is important to get across to the other entities is that \$5,000 is a great deal of money to us. They talk in much larger amounts like

\$50,000 (e.g. if we are plus or minus \$50,000 we can make this work.) We simply are not in their financial league. We can't keep up with the Jones' so we must request that Dispatch costs be contained, or we will fail in the consolidated dispatch effort. There has been very little recognition of this point. If we fail, it affects all the other entities.

I believe the message I've been sending has not been understood or well received. I've been trying to convey serious financial constraints. Instead, what I think has been heard is that Hailey does not support the consolidated dispatch. I take full responsibility for the failure of the message to be conveyed successfully. I must alter the message to emphasize that Hailey wants to be part of consolidated dispatch and we support it and we must do so in a way that is fiscally responsible. The two messages need to be better intertwined on my part.

I encourage you to ask me any questions you may have and to spend time with Chief Gunter and our fine police force and with Bob Greenlaw in Dispatch. It really does help you better understand the discussions taking place.

Sincerely,

/s/ Carol Brown
Hailey City Council Member

THIS IS A DRAFT, WORKING DOCUMENT WHICH IS NEITHER PRECISE NOR AGREED UPON BY ANYONE!!!!

DISPATCH FUNDING WORKSHEET	FY 2010 Estimated 13 Dispatchers	FY 2010 Estimated 13 Dispatchers
Expense Item	Expenses	Expenses
Dispatch Wages/O.T.	\$600,465	\$600,465
Employee Benefits	\$270,209	\$270,209
Operating Expenses	\$34,000	\$34,000
Equipment Leases	\$70,241	\$70,241
Total Expenses	\$974,915	\$974,915

Assumes existing capital lease is removed from 2010 Budget

Jurisdiction	CFS FY 2008 Q 1-3	% CFS	Hypothetical Shares	Elec. Connect	%	Shares	Elec. Connect.	% Elec. Connections	Shares
Sun Valley	2025	10.3%	\$99,944	2779	15.1%	\$146,869	2779	17.4%	\$87,599
Ketchum	4490	22.7%	\$221,605	6081	33.0%	\$321,378	6081	38.1%	\$191,683
City of Hailey	6543	33.1%	\$322,932	4321	23.4%	\$228,363	4321	27.1%	\$136,205
City of Bellevue	2388	12.1%	\$117,860	1166	6.3%	\$61,623	1166	7.3%	\$36,754
WRFR	597	3.0%	\$29,465	1250	6.8%	\$66,062	1250	7.8%	\$39,402
Carey Rural F&R	69	0.3%	\$3,406	349	1.9%	\$18,444	349	2.2%	\$11,001
BCSO	3641	18.4%	\$179,703	2501	13.6%	\$132,177	0	0.0%	\$0
Total	19,753	100.0%	\$974,915	18,447	100.0%	\$974,915	15,946	100.0%	\$502,644

Assumes WRFD and Ketchum Rural at 25% each of Union Area connections
THIS IS ARBITRARY and used only for comparative purposes.

AGENDA ITEM SUMMARY

DATE: 1/26/09 DEPARTMENT: PW DEPT. HEAD SIGNATURE: 

SUBJECT: Wastewater Treatment Plant Update on DEQ meeting and the discharge permit

AUTHORITY: ID Code _____ IAR _____ City Ordinance/Code _____
(IF APPLICABLE)

BACKGROUND/SUMMARY OF ALTERNATIVES CONSIDERED:

The attached memo (with attachments) addresses the recent publicity concerning the City of Hailey Wastewater System and decisions to extend sewer service outside the city limits.

FISCAL IMPACT / PROJECT FINANCIAL ANALYSIS: Caselle # _____
Budget Line Item # _____ YTD Line Item Balance \$ _____
Estimated Hours Spent to Date: _____ Estimated Completion Date: _____
Staff Contact: Tom Hellen Phone # 788-9830 Ext 14
Comments: _____

ACKNOWLEDGEMENT BY OTHER AFFECTED CITY DEPARTMENTS: (IF APPLICABLE)

___ City Attorney	___ Clerk / Finance Director	___ Engineer	___ Building
___ Library	___ Planning	___ Fire Dept.	_____
___ Safety Committee	___ P & Z Commission	___ Police	_____
___ Streets	___ Public Works, Parks	___ Mayor	_____

RECOMMENDATION FROM APPLICABLE DEPARTMENT HEAD:

ADMINISTRATIVE COMMENTS/APPROVAL:

City Administrator _____ Dept. Head Attend Meeting (circle one) Yes No

ACTION OF THE CITY COUNCIL:

Date _____

City Clerk _____

FOLLOW-UP:

*Ord./Res./Agmt./Order Originals: Record
Copies (all info.): _____
Instrument # _____

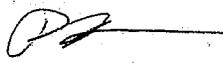
*Additional/Exceptional Originals to: _____
Copies (AIS only)

Draft 12-30-03

Public Works Memo

To: Mayor Rick Davis
City Council Members

CC: Heather Dawson, City Administrator

From: Tom Hellen, Public Works Director/City Engineer 

Date: 1/21/09

Re: Wastewater Treatment Plant Plan of Action

Attached to this memo are two summaries; of our meeting with DEQ on 1/13 and a telephone call with the EPA permit writer by our consulting engineer, Bill Benko of Carollo Engineers. As these can be confusing the following will set forth the tasks ahead of us and the possible timeframe associated with this work.

PLAN OF ACTION

Begin a sampling program both above and below our discharge point to quantify the current Big Wood River water quality. This will not likely have an impact on our permit renewal but could have long-term benefits. We have done this previously so it will not take much to reimplement.

As many of the assumptions in the Wastewater Master Plan are based upon population growth there will need to be a review of where we are and use lower growth estimates for the next few years in the plan. This will gain us some time before capital expenditures are needed to meet the new permit requirements.

Optimize plant operation with chemical additions to stay below new discharge limits. This is a low capital, increased O&M cost option. The re-estimation of growth projections noted above will affect this but we believe that at a minimum it will be six years before we bump up against the new discharge limits.

DEQ is scheduled to review the approved Total Maximum Daily Load (TMDL) study for the Big Wood River in 2011. While this will likely not affect the upcoming discharge permit it may allow for a longer implementation period from the EPA while this study is completed.

The time frame for selecting an engineering firm, design, voter approval or judicial confirmation, arranging financing, bidding and construction are being developed. This timeframe is expected to be at least five years. DEQ would perform the initial review and pass it on to the EPA for final review. This will be done in conjunction with the permit writing process with EPA.

To reach the waste load allocation in the approved TMDL, the City's NPDES permit limits are expected to reduce the allowable total suspended solids (TSS) discharge by 80% and the total phosphorus (TP) discharge by 65%. The wastewater treatment facility is currently operating at less than the design capacity, but it is approaching the mass loading limits defined in the TMDL. In order to reach the design capacity and projected growth in the service area, the wastewater treatment plant must be upgraded with new advanced filtration technologies. The City's objective will be to request an implementation plan that will allow for additional water quality assessment; growth and economic analysis; and financial planning for the first five year period, to coincide with the NPDES permit renewal. As noted, the implementation plan will be presented to Idaho DEQ, but must also be acceptable to EPA and the objectives of the Clean Water Act.

EPA CLARIFICATION

- Our EPA issued National Pollutant Discharge Elimination System (NPDES) discharge permit expired in June, 2006 and we applied for a new permit prior to that expiration. We received an extension of our existing permit and discharge limits until a new one was issued. We have since received word from EPA that our permit renewal process will begin at the end of 2009.
- Our current NPDES permit allows 94lbs/day of Total Suspended Solids (TSS) and 15 lbs/day of Total Phosphorus (TP). The likely revision of the permit would be from the TMDL and would limit TSS to 18 lbs/day and TP to 5.2 lbs/day. The Post-TMDL study would allow 44 lbs/day TSS and 8.6 lbs/day of TP.
- Requesting a phased approach to compliance is possible but the general compliance requirement is "as soon as possible".
- Entering into agreements with either Peregrine Ranch or Croy Canyon developments are not tipping points that would cost the City of Hailey \$12 million to upgrade the treatment plant. Capacity at the plant is not the issue; the issue is the stricter discharge limits likely to come from the EPA.
- The timeline for completing any expensive upgrades to the treatment plant will be dependent on both EPA requirements and growth in the city. By changing some wastewater treatment processes we believe we can meet even the stricter EPA permit requirements for six years or more.
- We are working with our consulting engineer to complete an implementation plan and timeline in anticipation of a future plant upgrade. That plan will be subject to public comment when it is fully drafted. We are also exploring other options such as reclaimed water reuse to lessen our discharge to the Big Wood River or requesting that discharge limits be reviewed and amended by DEQ and EPA.
- The Wastewater Treatment Plant operates extremely effectively remaining well below our current discharge limits.

MEETING MEMORANDUM

Project:	City of Hailey Wastewater Facility Plan	Conf. Date:	January 13, 2009
Client:	City of Hailey, Idaho	Issue Date:	January 20, 2009
Location:	Hailey City Hall Conference Room		
Participants	<u>City of Hailey</u> Heather Dawson Tom Hellen Roger Parker	<u>DEQ TFRO</u> Greg Misbach Sonny Buhidar David Anderson Bill Allred Sue Switzer	<u>Carollo</u> Bill Benko
Purpose:	Big Wood River TMDL Review and the Hailey Wastewater Facility Plan.		
Distribution:	Participants	File:	7956A.10

Discussion:

The following is our understanding of the subject matter covered in this conference. If this differs with your understanding, please notify us.

TMDL Background Discussion

1. The TMDL for the Big Wood River was completed by DEQ in 2001, and was approved by EPA in 2002, after a public comment and review period.
2. DEQ is obliged to enforce the Clean Water Act as defined by EPA.
3. Hailey discharges into Segment 2 of the Big Wood River, which covers from Tail Creek to the Glendale Diversion. This TMDL in this segment is based on loading to Magic Reservoir.
4. The TMDL addressed the 3 main point source dischargers; Ketchum, Meadows, & Hailey.
5. Bellevue does not currently discharge into the River, but may request a discharge permit in the future.
6. Water quality pollutants of concern include Total Suspended Solids (TSS), Total Phosphorus (TP), *E coli* bacteria, and fine sediments. Point source dischargers do not contribute fine sediments, so the emphasis is on TSS, TP and *E coli*.
7. TMDL defines the "waste load allocation" (WLA) for the point sources discharges. Load allocations are considered to be from non-point sources.
8. Water quality standards define the maximum "target" concentrations of pollutants (TSS < 25 mg/L and TP < 0.05 mg/L), which must not be exceeded at any time.
9. The TMDL waste load allocation for the point source discharges has no allowance for future growth. As growth occurs in the service area and discharge flows increase, removal efficiency of pollutants must also increase to stay below the loading limits.

10. A margin of safety (MOS) of 10% was used in the calculations for TSS, TP and *E coli* waste load allocations, as required by EPA.
11. DEQ defined a general 10 year implementation goal in the 2001 TMDL report.
12. TMDLs are periodically reviewed and updated. The Big Wood River TMDL is scheduled for the next update in 2011.
13. The Big Wood River, Watershed Advisory Group (WAG), remains active for other segments of the River. The "municipal committee", the three point source dischargers, represents Segment 2 of the Big Wood River, as the equivalent of the WAG.
14. The City has the ability to request reevaluation of the TMDL through the WAG, which will re-open the TMDL for public comment.

TMDL Revisions and Post TMDL

1. DEQ was concerned that non-point source loading was not adequately assessed in the original TMDL, reported as "data gaps." The post TMDL data (2002 & 2003) confirmed that non-point source loading to the stream did not appear to be contributing significantly to the stream load, or impacting water quality.
2. DEQ has not presented the Post-TMDL data or the draft report to EPA.
3. DEQ has no plans to complete and submit the Post-TMDL to EPA at this time.
4. The municipal committee (Ketchum, Hailey & Meadows) must first endorse the findings and recommendations in the Post-TMDL in the process of appending the approved TMDL.
5. DEQ TFRO requested staffing resources from the State Office, to reevaluate the Big Wood River TMDL.
6. DEQ TFRO requested reevaluation of the TMDL using the existing NPDES permit limits (TSS 94 lbs/day, TP 15 lbs/day), which would provide an allowance for future growth.
7. DEQ State office will respond if the basis to reopen or reevaluate the TMDL is justified, or provide other options. State office review and comment is expected within 30 days.
8. DEQ and the City can meet again after the response from the State office, to review reopening the TMDL, or other options, and discuss implementation strategies.
9. If the TMDL is reopened, it must go through a public comment period, and be resubmitted for approval by EPA.
10. The TMDL and existing NPDES permit daily loading is based on 1.6 MGD (2.476 cfs).
11. The Facility Plan 20-year projection of 1.85 MGD includes some development outside the service area, in combination with higher density within City limits, using an average growth rate of 4.5%.
12. DEQ drafted the Temperature TMDL in 2007, which remains in draft form and has not been submitted to EPA. Temperature of the Hailey discharge does not appear to impact the Big Wood River.

NPDES Permit and Discharge Limits

1. EPA Region 10 (Seattle) will draft and issue the next NPDES permit for Hailey.
2. Permit writers will reference the approved TMDL to prepare the discharge limits.

3. DEQ suggests an open dialog with the Region 10 permit writers while drafting the permit.
4. DEQ stated that smaller community permits were identified as a priority, although the time frame for the new permit remains unknown.
5. The NPDES permit will convert the TMDL TSS WLA (tons/year) into a 30-day average (lbs/day) with an allowance for a 7-day average, at the projected design flow.
6. Hailey can apply the 2002 & 2003 Post TMDL monitoring data to the proposed discharge limits during the discussions of the draft NPDES permit with EPA Region X.
7. Hailey can continue to collect effluent data and ambient water quality data to support effluent loading calculations in the next permit.
8. The TMDL and Post-TMDL did not have sufficient data to identify stepped effluent discharge concentrations, to allow higher loading during seasons with more available stream flow dilution. However, Hailey can investigate and attempt to define if seasonal limits are applicable.
9. Permit limits will apply the most stringent of (1) Technology-Based Limits, or (2) Water Quality Based Limits. The TMDL defines Water Quality Based criteria.
10. With the draft NPDES permit, DEQ will complete an anti-degradation analysis (CWA Section 401 Certification), as part of the public comment process.

Wastewater Land Application

1. State regulations that required of onsite wastewater systems within 1,000 feet of a public sanitary sewer connect into the central system when it became available, have since been eliminated during the latest revisions. Local agency or municipal control of the centralized collection system is preferred to State control.
2. For effluent reuse, nutrient limits for Class A Effluent must have Total Nitrogen less than 10 mg/L, with unlined storage ponds and unrestricted reuse. Systems for groundwater recharge must have Total Nitrogen less than 5 mg/L.
3. Private wastewater systems must prepare a Wastewater Facility Plan, also with Nutrient and Pathogen Analysis, and Technical and Financial Management Plan, for submittal review and approval by DEQ. The City may then be presented with the option to accept the private system, after DEQ approval.

TELEPHONE MEMORANDUM

Date: 01/20/2009 **Time:** 11:00 AM **WO #:** 6813B00
To: Brian Nickel **From:** Bill Benko
Of: EPA - Region 10, NPDES Permit Unit Section **Phone No.:** (206) 553-6251
Subject: Hailey Idaho NPDES Permit Renewal

EPA Region 10, NPDES Permit Unit was contacted to inquire on the status, tentative schedule and staff assignments to reissue the City of Hailey NPDES permit.

Brian Nickel has been assigned as the permit writer. His responsibilities will include drafting the other permits for Ketchum and the Meadows on this Segment 2 of the Big Wood River.
contact phone: (206) 553-6251, email: nickel.brian@epa.gov

The objective schedule is to issue the draft permit in 2009, expected in September or October. However, there are many other permits to be reissued, so the schedule is not firm.

Brian plans to conduct a site visit and facility inspection as part of drafting the permit. The schedule for the visit is unknown at this time.

The EPA will base the NPDES permit limits on the defined Waste Load Allocation in the approved TMDL.

For the implementation plan, the City should identify the time requirements to obtain funding, complete design and construction, and implement the findings and recommendations in the Wastewater Facility Plan. Idaho DEQ should initially review the compliance time-frame, for final review by EPA. Phased approach to compliance can be proposed, (*example: first-stage of two stage filters*), but EPA will make the final judgment. The general compliance requirement for water quality based effluent standards is "as soon as possible."

If DEQ has a compelling reason to re-open the TMDL, EPA will review the appropriate revisions, which must be resubmitted to EPA and include public comment period to revise the current (approved) TMDL.

EPA can review the TSS limit in tons/year with some "flexibility" in the permit limits. Any (seasonal) variance in effluent quality must comply with the target in-stream water quality concentrations. (TSS < 25 mg/L, TP < 0.05 mg/L) at any time.

EPA can review the subsequent 2002-2003 monitoring data and the Draft Post-TMDL report, but the findings must be coordinated and consistent with the WLA in the approved TMDL.

The City can undertake a sampling and analysis program to collect upstream and downstream ambient water quality data, and characterization of effluent data for the pollutants of concern. However, this is

more of a long-range water quality plan, and will not provide much benefit for the draft permit expected in 2009.

Economic and affordability factors are considered for technology based effluent limits. However, the WLA in the TMDL are all water quality based effluent limits, which are not separated by economic restrictions. The entity must do what is necessary to comply. The Big Wood River designation as Special Resource Water emphasizes the recreational, ecological and aesthetic values of the watershed.

Brian was informed of the City's desire to participate openly with the draft NPDES permit. As the first exercise, Brian must review the "data dump" or the history of the monthly effluent monitoring reports submitted by the City. Brian suggested that any additional information the City has to supplement DMRs can be forwarded to include in the initial review. Brian also requested a copy of the Draft Wastewater Facility Plan if available.

I asked if Brian had the calculations from the current NPDES Fact Sheet that showed the calculation of the TSS discharge limit of 94 lbs/day. From the 2001 Fact Sheet, it is stated that 94 lbs/day is a water quality based permit limit, that was carried forward from the 1996 permit. As a calculated water quality based limit, the 94 lbs/day TSS is "protective" of water quality. The permit fact sheet calculations do not appear to be consistent with the TMDL WLA calculations that report 18 lbs/day (3.3 tons/year) is required to protect water quality. Brian will continue to research the background and the loading calculations. At the time, the permit fact sheet data was not likely to have included the TMDL data, based on the dates DEQ completed and submitted the final report to EPA.

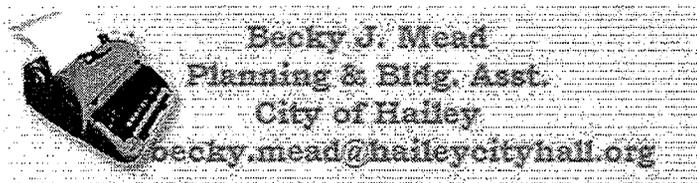
Mary Cone

From: Becky Mead [becky.mead@haileycityhall.org]
Sent: Friday, January 09, 2009 8:27 AM
To: 'Mary Cone'; 'Beth Robrahn'
Cc: kgoldman@woodriverlandtrust.org
Subject: FW: City Council mtg

Mary or Beth,

Would one of you assist Kathryn with her request below?

Thanks



From: Kathryn Goldman [mailto:kgoldman@woodriverlandtrust.org]
Sent: Thursday, January 08, 2009 5:34 PM
To: becky.mead@haileycityhall.org
Cc: tom.hellen@haileycityhall.org; carol.brown@haileycityhall.org; rick.davis@haileycityhall.org; Scott Boettger
Subject: City Council mtg

Becky,
I would like to make a presentation to the city council at an upcoming meeting regarding a few items:
This summer, WRLT worked with the city to do some restoration work at Lions Park through a DEQ grant. The city, along with being the landowner, was a funding partner on the grant.
I updated the Hailey Parks and Land Board on Monday evening regarding the completion of the boardwalk/signage at Lions Park, which is the last expenditure in the grant. We are scheduled to complete that this summer. Since we received the grant, WRLT is now the neighboring landowner immediately to the south and we have an amendment to the plan for the boardwalk that would increase the size of the project by accessing the north portion of WRLT's land. I would like to brief the council on these issues. Would you have time on an upcoming agenda for me to make a 5-10 minute presentation and discuss the new plan with the council? WRLT would like to work with the city to expand the existing restoration project at Lions Park with a grant application to DEQ in the 2010 funding cycle if the city is agreeable. I briefly discussed this potential project with the Parks and Land Board. I would like to brief the city on that as well. All of this can be fairly brief.

I am headed out of town for a vacation for two weeks starting on Jan 10, so perhaps we can discuss the scheduling of this on the phone tomorrow.

I look forward to speaking with you. Thanks in advance for your time on this.

Kathryn Goldman

Kathryn Goldman | Project Coordinator

kgoldman@woodriverlandtrust.org

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