

Attachment No. 4

AKM Consultant's Letter



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*Water  
Resources*

*Infrastructure*

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*Municipal  
Services*

**June 4, 2018**

**Garden Grove Sanitary District  
13802 Newhope Street  
Garden Grove, California 92843**

**Attention: Mr. Samuel Kim, P.E.  
Water Services Manager**

**Subject: Sewer Lateral Ownership**

**Dear Mr. Kim:**

As you are aware, I have over 44 years of water resources engineering experience. I have been a registered professional engineer in California since 1978. I have a Master of Science degree (Water Resources Engineering) from California State University, Long Beach (1974). My professional background includes instruction in fluid mechanics and graduate level hydraulic design classes at California State University Long Beach. During my career, I have been responsible for successful completion of 40 sewer master plans and sewer system management plans, including 16 financial evaluations and rate studies. I have served as an expert witness for the City of Alhambra and Costa Mesa Sanitary District on lawsuits by the Regional Water Quality Control Boards over sanitary sewer overflows. I have been the contract District Engineer for the Garden Grove Sanitary District since 2003, and assisted the District with Orange County Coastkeeper's lawsuit against the District. I have provided similar services to the Cities of Cypress, Seal Beach, Ontario, Alhambra, El Segundo, and Camarillo Sanitary District under on-call engineering services.

With respect to the private sewer lateral ownership, the District has approximately 35,000 laterals (32,000 residential, and 3,000 commercial, industrial and institutional). The approximate total length of lower laterals (the portion of the laterals between the property line and the mainline District sewer) is 165 miles, which is 50 percent of the total length of the District owned mainline system. Further, the District's standards require a clean-out on sewer laterals behind the property line. A great majority of the existing laterals do not have cleanouts.

**Mr. Samuel Kim, P.E.**  
**Water Services Manager**  
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Constructing a lateral at an estimated cost of \$3,000 each would be an added financial burden of \$105 million, which is currently not covered by the District's financial planning. The average replacement cost for the lower lateral is estimated at \$10,000 each, with a potential financial burden of \$350 million. Due to increase in staff and maintenance cost related to lower lateral ownership, and significant cost involved in installing cleanouts and/or lateral replacements, the District should maintain its current policy, unless such costs are covered through increase in rates.

Please do not hesitate to contact the undersigned if you have any questions or require additional information.

Very truly yours,

**AKM Consulting Engineers**

  
Zeki Kayiran, P.E.  
Principal