

- F. To Petitioners knowledge, NRSA has not adopted any Capital Improvement Plan, Master Plan, Facilities Plan or other study that proposes service to the HON development, provides what improvement are needed, estimated costs or a schedule to make such improvements. There is no current plan that shows service is technically or economically feasible nor a timeline for such service.
- G. Petitioners assert that to make such improvements would cost no less than \$1.8 million in 2016 dollars and at this cost, service is economically unfeasible.
- H. ORS 450.840 to 450.855 provide direction by the Legislature to NRSA that the areas directly benefitted by the sanitary sewer improvements shall pay the costs of construction. NRSA did not follow that direction so that HON has already paid for sewerage system facilities for which it obtains no direct benefit. NRSA should have charged actual system users through rates and charges (ORS 450.880) or assessments against the benefitted properties of actual users (ORS 450.840). It did not. HON properties have paid for systems for which no benefit is conferred and face the risk that any plan to serve them will be financed entirely by HON and any new users; not existing users.
- I. NRSA has adopted System Development Charges based on water meter size. The typical residential home will pay a sewer SDC of \$10,595 for a 5/8 by 3/4 water meter and more as the meter size increases. Therefore, HON properties that ultimately connect to NRSA will pay an additional amount for capacity in sanitary sewer improvements for which they have already paid.
- J. Petitioners assert that it is economically infeasible to impose the costs of service extension to HON owners and that it would be unfair to burden them twice with the costs of extension and connection. Currently, all homes in the HON are served by state of the art functioning on-site septic systems installed at a significant cost to each homeowner. The systems are privately maintained and have posed no danger to public health. These homeowners do not need and have not requested service from NRSA.
- K. The Public Facilities Chapter of the Tillamook County Comprehensive Plan recognizes that the costs of sewerage areas within the Community Growth Boundary may exceed the benefit of doing so. That is the case with HON. Petitioners assert it is technically and financially infeasible to extend service to HON in an economic and efficient manner.

5. Request for Hearing:

The Petitioners request that the Board of County Commissioners set a date for hearing on this Petition not less than 30 days nor more than 50 days from the date this Petition is filed under ORS 198.800 and cause notice of the hearing to be posted and published. Petitioners further request that the Board conduct the hearing and approve this Petition.

Enclosure ¹
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