



April 13, 2020

Washington State Department of Health
Northwest Drinking Water Regional Operations
20425 72nd Ave South, Suite 310
Kent, WA 98032-2388

Re: Scatchet Head Water District, ID # 76470
Island County
Water System Plan – 2019
Submittal # 19-0904

To Whom It May Concern,

The following is in response to the comment received from the draft of the Water System Plan update for the Scatchet Head Water District. The comments have been reviewed and addressed in the revised Water System Plan Submittal. In this memorandum the questions have been organized with the Department of Health comments in bold with the relevant response. The comments and responses are as follows:

System Description and Basic Planning Data

- 1. Page 5, Figure 1, and maps are not in Appendix A. Rather they are found in Appendices B and C. Need to identify “retail service area” on the service area map per Municipal Water Law (MWL).**

On page 5 the references appendices have been modified and corrected. The “retail service area” is now identified on the Service Area Maps provided in Appendix C.

- 2. Provide signed local government consistency statement from Island County prior to DOH approval.**

The District is currently waiting on the local government consistency statement for Island County. The District has received a letter from the Public Works Development Coordinator, Bill Poss, that he has no objection to issuance of a Local Agency Consistency Determination (This letter is included as attachment D to this response). We anticipate that the determination will be granted in the near future from the Island County planner. The Local Agency Consistency Determination will be provided as an addendum to the Water System Plan.

System Analysis

- 3. No Comments. Excellent Job.**

Operations & Maintenance

- 4. Update coliform monitoring plan to reflect the RTCR. Please provide a map and sample locations, and identify who would conduct a Level 1 & 2 assessment.**

The coliform monitoring plan in Appendix R has been updated to reflect the RTCR. It now includes a map of sample locations and identifies who will conduct Level 1 & 2 assessments.

- 5. Develop an E. coli response plan. Describe how Scatchet Head will respond to an unfavorable E. coli result. What action is needed to restore service? And what advice will be given to customers (and when and by whom)?**

An addendum to the Coliform Monitoring plan is included in Appendix R which addresses the District’s E Coli response plan.

Seattle
9706 4th Ave NE Suite 300
Seattle, WA 98115
tel 206.523.0024

Mount Vernon
2210 Riverside Dr, Suite 110
Mount Vernon, WA 98273
tel 360.899.1110

Federal Way
31620 23rd Ave S, Suite 307
Federal Way, WA 98003
tel 206.523.0024

Whidbey Island
1796 E Main St, Suite 105
Freeland, WA 9824
tel 360.331.4131

- 6. Appendix K. Cross Connection Control (CCC). Provide a signed resolution documenting your current authority. Provide a CCC specialist’s documentation about the swimming pool having the proper backflow prevention device prior to plan approval.**

The signed resolution to be by the District adopting the Cross-Connection Control Plan is included in Appendix K or the Water System Plan. A backflow prevention assembly test report is included in this letter as Attachment A. The backflow preventer is being replaced. Documentation verifying the replaced backflow prevention device will be included as Attachment A to this response letter.

- 7. Page 50. Emergency Response. Very minimal with no appendix. Provide a commitment to fill out the DOH emergency guide template for small water systems within the next 3 years. See: Emergency Response Planning Guide for Public Drinking Water Systems (PDE, DOE 331-2111)**

- a. DOH strongly recommends the District to become a WAWARN member.**

The District is now a member of WAWARN as recommended.

- b. Does the District realize that the federal government wants mutual aid agreements to be utilized prior to any requests if there was a regional disaster?**

The District is aware and will evaluate options to provide mutual aid with surrounding systems.

- c. Are any of the District commissioners trained in CERT or ARES for emergency preparedness? DOH highly recommends soliciting and training for a few volunteers in your community. Trainings are provided for free through Island County Emergency Management**

One of the District Commissioners is scheduled to receive CERT training in June of 2020.

- 8. Describe what is being done by the manager for \$600/month and provide a contract from King Water about the services they are providing the District.**

A copy of the current contract with King Water is included in Appendix A. Section 6.2.1 has been added to outline the services provided by the SMA. A copy of the onsite manager job description for the District has also been included in Appendix A.

- 9. Has anyone considered attending the quarterly Whidbey Island Water System Association (WIWSA) meetings to gain additional knowledge and for the networking opportunities?**

The SHWD has adjusted the date of District meeting to allow attendance at the Whidbey Island Water System Association meetings and they have started attending WIWSA meetings.

Water Use Efficiency (WUE), Source Water Protection, and Water Resources

- 10. Provide a water loss control action plan per WAC 246-290-820 since the rolling 3-year average is 13.6% distribution system leakage (DSL).**

Section 4.1 of the report has been modified and expanded to include a Water Loss Control Action Plan which outlines various projects addressed in the CIP which aim at providing accurate measurements and system assessment.

- 11. Appendix J. Source Water Protection (SWP). Per the pre-plan, provide documentation of educational letters being sent to customers within the one-year time-of-travel (TOT) area for the active wells?**

The educational letters to be sent to customers within the one-year TOT have been included with the Well Head Protection program and can be found as the last page in Appendix J. A copy of the educational letter regarding the protection of the District’s source has also been included as Attachment B to this response letter.

12. Address Ecology's October 28, 2019 comment letter and provide us with documentation Ecology is satisfied.

The comments provided by the Department of Ecology from October 28, 2019 have been addressed and documentation with Ecology as Attachment C to this response letter. The letter is also included in Appendix U.

13. Since the District is requesting an additional 146 connections with this plan approval, please provide an email from Doug Kelly, Island County hydrogeologist, stating he finds this satisfactory as the County has code authority over seawater intrusion when requesting additional connections".

DCG has received an email from Doug Kelly regarding the additional connection and seawater intrusion concerns. His response is included as Attachment D to this response letter.

Financials, Rates, and Capital Improvement Plan

14. Page 39 and 60. Purchasing an emergency generator sooner rather than later may be a great way of explaining the added value to your customers from the recent rate increases, 2019-2023, and for a small amount of money, there is a positive and real payback if there is even one winter storm where it helps customers.

The District is currently working on plan to add the generator in the next year. The district has already contacted a reputable contractor to assess cost to provide the additional generator.

15. Page 65. If there is a decision to add new parcels outside your current service area, this will require a water system plan amendment so please contact Jennifer for a scoping meeting and additional review fee estimate.

The District is aware that expansion of the service area will require an amendment to the Water System Plan. Community feedback isn't currently in favor of expansion of the service area, so these elements are not pursued in this update.

16. Page 69. DOH strongly recommends financing a rate study. It will prove valuable as you attempt to play catch up on full cost water rates.

The District plan on funding a rate study to assist in identifying the proper rate and fee structure that more accurately addresses current and future needs of the system and its value to customers.

a. What has been the revenue from additional connections in the past three years?

The revenue from service installation fees over the past 3-years has been \$20,000 (4 connections). In Section 9.5.3 the revenue from service connections from the past 3-years is now discussed.

b. What is the amount of revenues from new connections that the District think is reasonable for this 10-year planning period?

Over this 10-year planning period the District plans on having an additional 20 connections which will bring in an additional \$100,000 in revenue. This is now included in Section 9.5.3 also.

17. DOH is cheering your leadership for the August 2019 rate increase through 2023. More is going to be required. Base rates lower than \$40 per month are of concern to all governmental funding agencies. The DOH concern is that there will be intergenerational inequity over time as infrastructure needs to be replaced, and the full cost of water service is not being covered currently.

- a. **Page 71. Per your statement about MI-IHI, and if the water rate were at 1.5%, which is considered “affordable”, the annual amount would be \$923/connection which means there is room for additional rate increases.**
- b. **The American Society of Civil Engineers’ recent report gives drinking water infrastructure a “D Grade.” This fact may provide some support as the District continues to educate themselves and their customers about the necessary rate to sustain the needs of the water system.**
- c. **Many utilities are adding a capital project surcharge to their rate structures, and showing it on the bill so customers understand that it takes both annual O & M expenses, as well as some replacement funding, to keep a water system financially viable. It is good practice to educate customers in good economic times that aging infrastructure is a huge capital expense, and this expense will continue into the future since water rates in the past have not been funded for the full cost of water service.**
- d. **Does the District have a capital replacement surcharge identified on customer bills in order to help communicate the cost and value of drinking water? Will the District consider this as an option in the future?**

The District will evaluate the use of capital project surcharges in the future to assist in demonstrating the true cost of system maintenance and improvements in the future. This isn’t currently identified on the customer’s bills, but the board will attempt to implement this option along with the rate study.

- 18. Appendix O. Your component inventory sheet is a great beginning. Asset management is gaining traction among well-managed water utilities. The District should strongly consider embracing this new industry standard of doing business to be able to educate your citizens about the true costs of water service in the time of aging infrastructure. Does the District realize that the DW State Revolving Fund (DWSRF) provides bonus points for completing the asset management elements per the SRF guidelines, thus increasing the chance of being funded? See DOH website for a free excel template: <https://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/WaterSystemAssistance/DrinkingWaterStateRevolvoingFundDWSRF>**

The inventory has been updated to use the items identified in the template provided by the DOH. The system intends to apply for DWSRF assistance in the future intends to meet the requirements to obtain the bonus from having asset management elements address per SRF guidelines.

Other Documentation

- 19. Provide documentation for:**

- a. **A signed resolution adopting the plan by the elected officials (not in Appendix A)**

A signed resolution adopting the plan is included in Appendix T.

- b. **Consumer meeting regarding the water system plan update with a WUE demand efficiency goal discussed and identified per requirement of MWL, and WAC 246-290-830 (not in Appendix A)**

The minutes from the consumer meeting regarding the water system plan update is provided in Appendix T.

- c. **Current Island County franchise agreement (Appendix A. Expired 2/28/18)**

King Water is currently in the process of update the Franchise Agreement with Island County. The county had previously accepted the processed the payment for the updated agreement but misplaced the

To: Scatchet Head Water District – Board of Commissioners
Date: April 6, 2020

paperwork. Replacement paperwork has been provided and an updated Franchise Agreement will be provided as an addendum to this Plan.

d. Final PE stamp

The latest version of the Water System Plan is stamped as noted.

The above questions and responses are in relation to the draft Water System Plan for the Scatchet Head Water District. The Water System Plan has been prepared by DCG, Inc. and presented to the Scatchet Head Water District's board of commissioners and King Water Services to receive appropriate feedback to ensure it accurately reflects the District's distribution system, goals, and operating practices. If you have any questions, please feel free to contact us at (360) 331.4131 or at robert@dchengr.com.

Sincerely,

David Consulting Group, Inc.



Robert Bennion, PE
Project Manager

Attachment A – Backflow Prevention Test Report

BACKFLOW PREVENTION ASSEMBLY TEST REPORT

King Water Company P O Box 2243 Oak Harbor, WA 98277 (360)678-5336

NAME OF PREMISES: Scatchet Head Pool Commercial Residential
 SERVICE ADDRESS: 3742 Driftwood Dr CITY: Clinton ZIP: _____
 CONTACT PERSON: Jerry PHONE: 1.575.740.7862 E-mail/Fax: _____
 LOCATION OF ASSEMBLY: Boiler Room
 DOWNSTREAM PROCESS: boiler DCVA RPBA PVBA OTHER: _____
 NEW INSTALLATION EXISTING REPLACEMENT OLD ASSEMBLY SERIAL NUMBER: _____
 MAKE OF ASSEMBLY: Cii MODEL: 4030302 SERIAL NO.: 13762 SIZE: 1/2"
 LINE PRESSURE 40

INITIAL TEST	RPBA RELIEF VALVE OPENED AT <u>30</u> PSID	DCVA/RPBA CHECK VALVE NO.1 LEAKED <input checked="" type="checkbox"/> CLOSED TIGHT <input type="checkbox"/> _____ PSID	DCVA/RPBA CHECK VALVE NO.2 LEAKED <input checked="" type="checkbox"/> CLOSED TIGHT <input type="checkbox"/> _____ PSID	PVBA AIR INLET OPENED AT _____ PSID DID NOT OPEN <input type="checkbox"/> HELD AT _____ PSID LEAKED <input type="checkbox"/>
PASSED <input type="checkbox"/> FAILED <input checked="" type="checkbox"/>				
NEW PARTS REPAIRS	CLEAN <input type="checkbox"/> REPLACE <input type="checkbox"/> PART	CLEAN <input type="checkbox"/> REPLACE <input type="checkbox"/> PART	CLEAN <input type="checkbox"/> REPLACE <input type="checkbox"/> PART	CLEAN <input type="checkbox"/> REPLACE <input type="checkbox"/> PART
FINAL TEST PASSED <input type="checkbox"/> FAILED <input type="checkbox"/>	RELIEF VALVE OPENED AT _____ PSID	CLOSED TIGHT <input type="checkbox"/> _____ PSID	CLOSED TIGHT <input type="checkbox"/> _____ PSID	AIR INLET _____ PSID CHK VALVE _____ PSID

PROPER INSTALLATION/AIR GAP: Yes No APPROVED ASSEMBLY: Yes No Detector Meter Reading _____

REMARKS: Very old unit. Recommend replacement with new unit

SERVICE RESTORED YES NO IF NO GIVE REASON _____

CALIBRATION DATE 7, 11, 18 MAKE: WATTS MODEL TK-99E SERIAL # 0038697

TESTER'S SIGNATURE [Signature] Cert. No. 56566 DATE 3/26/20
~~B-6469~~

TESTER'S NAME PRINTED Row Lodamer TESTERS PHONE # (360) 678-5336
Jason Terpening

REPAIRED BY _____ DATE _____

FINAL TEST BY _____ Cert. No: _____ DATE _____

Attachment B – Source Protection Letter

Scatchet Head Water District
7906 Guemes Avenue
Clinton, WA. 98236

PROTECTION OF DISTRICT WELLS

Dear Water District Customer,

The Scatchet Head Water District is required by the Washington Department of Health to develop a wellhead protection plan. Wellhead protection involves protecting the land area surrounding our wells in order to prevent contamination of our drinking water supply. The District's wells are located on a parcel at the intersection of Samish Court and George Drive. Part of the plan is this letter of notification to all potential sources of contamination to our wells. Most of District's residents live within the wellhead protection zones surrounding our well field and employ the use of septic systems to dispose of wastewater.

This letter is intended to inform you of the location of our wells and protection zones, and to serve as a reminder that any hazardous material put onto the ground or into your septic system has the potential of contaminating our drinking water supply. Some potentially harmful activities to avoid are:

- Improper use of a septic system (dumping paint, household cleaners, or solvents into your septic system).
- Dumping motor oil, gasoline, antifreeze or similar fluids onto the ground.
- Heavy use of fertilizers and pesticides.
- Dumping or burying garbage in the ground.

It should be the intent of all resident to keep and protect the quality of the water serving our community, for our continued good use, and for the ones that come along after us. Thank you for following these guidelines. If you have any questions about this matter, please feel free to contact me the District's Board of Commissioners.

TIPS TO AVOID SEPTIC SYSTEM TROUBLE:

- DO take leftover household chemicals to a hazardous waste collection center for disposal.
- DO practice water conservation. Repair dripping faucets and leaking toilets.
- DO learn the location of your septic system and drain field.
- DON'T allow anyone to drive or park over any part of the system. Areas should be left undisturbed with only a mowed grass cover. Roots from nearby trees or shrubs may clog and damage your drain lines.
- DON'T poison your system by pouring chemicals down the drain. They can kill the beneficial bacteria that treat your wastewater.

Your Cooperation is most appreciated.

Attachment C – DOE Response Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

FEB 10 2020

Scatchet Head Water District
7906 Guemes Ave
Clinton, WA 98236

RE: Water Right No. G1-20574

Dear Sir or Madam:

In response to your request, you are hereby **GRANTED** an extension to put the water to full beneficial use for the reason(s) below:

- Need more time to grow into their water system. Currently, they have 410 connections with the ability to go to 451 connections.
- Chloride and static water levels provisions not followed.

The new deadline to submit your *Proof of Appropriation of Water* is **May 1, 2025**.

Reminder you have provisions on your water right permit. A final certificate will not issue until all provisions are met.

- The amount of water granted is a maximum limit that shall not be exceeded and the water user shall be entitled only to that amount of water within the specified limit that is beneficially used and required.
- An approved measuring device shall be installed and maintained for each of the sources identified by this water right in accordance with the rule "Requirements for Measuring and Reporting Water Use", chapter 173-173 WAC.

Water use data shall be recorded monthly. The maximum rate of diversion/withdrawal and the annual total volume shall be submitted to Ecology by January 31st of each calendar year.

The following information shall be included with each submittal of water use data: owner, contact name if different, mailing address, daytime phone number, WRIA, Permit/Certificate/Claim No., source name, annual quantity used including units,



maximum rate of diversion including units, and period of use. In the future, Ecology may require additional parameters to be reported or more frequent reporting. Ecology prefers web based data entry, but does accept hard copies. Ecology will provide forms and electronic data entry information.

Chapter 173-173 WAC describes the requirements for data accuracy, device installation and operation, and information reporting. It also allows a water user to petition Ecology for modifications to some of the requirements. Installation, operation and maintenance requirements are enclosed as a document entitled "Water Measurement Device Installation and Operation Requirements".

Department of Ecology personnel, upon presentation of proper credentials, shall have access at reasonable times, to the records of water use that are kept to meet the above conditions, and to inspect at reasonable times any measuring device used to meet the above conditions.

- If it can be shown that the requested change has a detrimental effect on existing rights, it shall be the responsibility of the operator to mitigate for this impact and/or alter or cease withdrawal of water.
- Chloride and conductivity measurements as well as depth to static water level (pump off), measured from the top of the well casing, shall be made on each production well in April & August. The analysis shall be performed by a state accredited laboratory. A copy of the laboratory results for all sampling events shall be submitted by October 15 of each year, to the Department of Ecology, Northwest Regional Office, Bellevue, Washington. For record keeping, please include the water right number on all copies.
- If pumping from the wells authorized by this water causes chloride concentrations to show an increasing trend in any of the wells, immediate action shall be required to prevent pumping concentrations from increasing as in consistent with the water quality anti-degradation policy WAC 173-200-030. If corrective measures fail to prevent chloride concentrations from increasing in the future, permittee or certificate holder shall relinquish the option to perfect additional quantities regardless of the stage of development.
- In order to protect the resource, static water level (SWL) shall be measured at least once each month. Measurements shall be taken after the pump has been shut off a reasonable time to allow water level to return to normal. Ecology's Water Resources section. (NWRO) shall be notified if a below normal seasonal drop is measured in SWL, otherwise this data shall be maintained and be made available to Ecology upon request.
- Installation and maintenance of an access port as described in WAC 173-160-291 is required. An air line and gauge may be installed in addition to the access port.
- All water wells constructed (or abandoned) with the State shall meet the minimum

standards for well construction and maintenance as provided under chapter 18.104 RCW, Washington Water Well Construction Act of 1971, and chapter 173-160 WAC, Minimum Standards for Construction and Maintenance of Wells.

- Issuance of the water right be subject to implementation of the minimum requirements established in the Conservation Planning Requirements, Guidelines and Requirement for Public Water Systems Regarding Water Use Reporting, Demand Forecasting Methodology, and Conservation Programs, March 1994, and as revised.

We have modified the following provision:

- Prior to any new construction or alterations of a public water supply system, the State Board of Health rules require public water supply owners to obtain written approval from the Office of Drinking Water of the Washington State Department of Health. Please contact the Office of Drinking Water at Northwest Drinking Water Operations, 20435 72nd Avenue S, Suite 200, K17-12, Kent, WA 98032-2358, (253) 396-6750, prior to beginning (or modifying) your project.

Your Right To Appeal

You have a right to appeal this Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal, you must do the following within 30 days of the date of receipt of the Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order to Ecology in paper form - by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW, Ste 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

For additional information, visit the Environmental Hearings Office Website: <http://www.cho.wa.gov>. To find laws and agency rules, visit the Washington State Legislature Website: <http://www1.leg.wa.gov/CodeReviser>.

Scatchet Head Water District

G1-20574

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If you have any questions, please contact Michele Curtis at (425) 649-7278 or at michele.curtis@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Berns', with a long horizontal flourish extending to the right.

Ria Berns

Section Manager

Water Resources Program

By Certified Mail: 9171 9690 0935 0214 2443 96

Enclosures: *Proof of Appropriation of Water*
Your Right to be Heard

cc: Sandra Bodamer, King Water Company

Attachment D – Island County Documentation



ISLAND COUNTY PUBLIC WORKS

ROADS DIVISION

P.O. BOX 5000, COUPEVILLE, WA 98239

(360) 679-7331

William E. Oakes, P.E., Director/County Engineer

Connie W. Bowers, P.E., Asst. County Engineer

April 13, 2020

TO: Jonathan Lange, Planning and Community Development
FROM: Bill Poss, Public Works Development Coordinator
SUBJECT: Scatchet Head Water District
Local Agency Consistency Determination

Public Works has reviewed the recently provided new information (Scatchet Head Water District Local Agency Consistency Determination response letter by DCG Inc. dated March 24, 2020 and Revised Water System Plan by DCG Inc. dated April 2, 2020) for consistency with its development standards and provides the following comments.

As noted by DCG “The Scatchet Head Water District doesn’t currently have plans to expand their existing water system, but they do plan on expanding fire flow service as they replace aspects of their system. The distribution system has the capabilities to provide fire flow to all portions of the system if water mains were sufficiently sized.

The revised Water System Plan now includes a schedule and funding plan to support the future fire flow improvements.

Given the above Public Works has no objection to issuance of a Local Agency Consistency Determination.

Please feel free to call me at 360 678-7813 or e-mail me at billp@islandcountywa.gov if you have any questions regarding the above comments.

Robert Bennion

From: Doug Kelly <D.Kelly@islandcountywa.gov>
Sent: Wednesday, January 8, 2020 8:54 AM
To: Robert Bennion
Cc: Denis Mehinagic (Denis.Mehinagic@doh.wa.gov)
Subject: RE: Scatchet Head Water District - Water System Plan

Robert,

All of Scatchet Head Water District's sources (wells) are currently classified as being 'low risk' for seawater intrusion under [ICC 8.09.099 \(Seawater Intrusion Protection\)](#). As such Island County Public Health has no objection to the expansion of the water districts approved connection limit. I hope this helps, please let me know if you have any questions.

Thanks,
Doug

Douglas J. Kelly L.G., L.HG.
[Hydrogeologist](#)
[Island County Environmental Health](#)
(360) 678-7885

From: Robert Bennion <robert@dcgenr.com>
Sent: Tuesday, January 7, 2020 4:16 PM
To: Doug Kelly <D.Kelly@islandcountywa.gov>
Subject: Scatchet Head Water District - Water System Plan

Doug,

We have been working with the Scatchet Head Water District to update their water system plan which has included a new capacity analysis. The updated capacity analysis shows that the system can support 597 connections which is an increase from the existing DOH approved connections of 451. One of the comments from the DOH review requires, "an email from Doug Kelly, Island County hydrogeologist, stating he finds this satisfactory as the County has code authority over seawater intrusion when requesting additional connections."

What information can I provide to obtain this authorization? I have the capacity analysis and can locate testing results from King Water depending on what is required. Thanks in advance for your help.

Robert Bennion, P.E.
Civil Engineer
Davido Consulting Group, Inc.
T 360.331.4131 x206 | C 503.515.8648
Seattle | Mount Vernon | Whidbey Island | Federal Way
www.dcgengr.com