

**Special Meeting Agenda**  
**PUD Board of Commissioners**  
Tues, Feb 23, 2021 10:00 AM  
zoom  
Port Townsend, WA 98368



To join online go to: <https://zoom.us/my/jeffcopud>. Follow the instructions to login. Meetings will open 5 minutes before they begin. TOLL FREE CALL IN #: 833-548-0282, Meeting ID# 4359992575#

**1. Call to Order**

Per the Governor's Extended Proclamation 20-28 and in response to the COVID-19 Pandemic, Jefferson County PUD is no longer providing an in-person room for meetings of the BOC. All meetings will be held remotely via Webex until otherwise informed by the Governor. Participant audio will be muted upon entry. Please unmute at the appropriate time to speak. If you are calling in, use \*6 to mute and unmute.

**2. Agenda Review**

**3. Shine Platt Resolution Hearing Date Change**

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[Agenda Report Fixing Shine Plat LUD 17 hearing date 210223.docx](#) 

[Resolution ReSetting of LUD Hearing Date for Shine Plat LUD 17.docx](#) 

**4. 2020 Water System Plan update review**

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[Agenda Report-2020 WSP Update Review.pdf](#) 

[Draft Res2021-0XX 2020 WSP Update Adoption.pdf](#) 

[JPUD WSP Response to Comments 2021-02-18.pdf](#) 

[JPUD WSP ReviewApproval Process.pdf](#) 

[Presentation](#) 

**5. Adjourn**



## AGENDA REPORT

**DATE:** February 23, 2021  
**TO:** Board of Commissioners  
**FROM:** Samantha Harper, P.E., Engineering Director  
**RE:** ~~Adopting a~~Setting a new date ~~to fix for~~ a hearing ~~on for~~ the Shine Plat Local Utility District (LUD) No. 17  
**RECOMMENDATION:** Approve Resolution

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**SUMMARY:** Staff requests the Board of Commissioners set a date for the hearing on the formation of LUD No. 17 for the Shine Plat.

**BACKGROUND:** In 2016, Public Utility District No. 1 of Jefferson County (PUD) performed a Feasibility Study – Consolidation of the Bywater Bay Water System and the Shine Plat Water System ~~which was~~ prepared by Washington Project Consultants, PLLC and funded through a grant from the Department of Health (DOH). Among other findings, the consolidation study proposed water system improvements which need to be completed prior to the consolidation of the Shine Plat Water System (Water System ID #05820) into the Bywater Bay Water System (Water System ID #02043).

In 2017, the PUD was petitioned by the residences of the Shine Plat Water System to form a Local Utility District (LUD) as the funding mechanism to finance the water system improvements.

The PUD has been awarded the 2020 Department of Health Drinking Water State Revolving Fund loan in the amount of \$494,000 for design, permitting and construction of the water system improvements needed for consolidation of the Shine plat water system into the PUD's Bywater Bay Water System.

There is a conflict with the existing time frame (10:00am – 12:00pm) of the hearing date of March 9, 2021 with the RCW which states that if a majority of the owners of land in the area of the LUD do not file a petition protesting the improvement prior to twelve o'clock noon of the day of the hearing to the secretary of the Board of Commissioners. Since our paper of record is a weekly paper, we cannot keep the existing hearing date and meet the not less than two weeks (15-days) notice requirement per RCW54.16.140. Therefore, the hearing will need to be moved from March 9<sup>th</sup>. We are proposing to hold the hearing at the regular BOC meeting on March 16, 2021, starting at 5:00pm.

Resolution 2021-0\_\_ is to re-establish a hearing date for the Shine Plat LUD No. 17.

**ANALYSIS/FINDINGS:** None

**FISCAL IMPACT:** None

**RECOMMENDATION:** Staff is recommending that the Board adopt a fixed date for the hearing on the formation of the Shine Plat LUD No. 17.

**Attachments:** Resolution 2021-0XX

**PUBLIC UTILITY DISTRICT NO. 1  
OF  
JEFFERSON COUNTY**

**RESOLUTION NO. 2021-0XX**

A RESOLUTION of the Board of Commissioners of the Public Utility District No 1 of Jefferson County, Washington (“the PUD”), re-establishing a date for a Hearing for the Shine Plat Local Utility District (LUD) No. 17.

WHEREAS, in 2016, Public Utility District No. 1 of Jefferson County (PUD) performed a Feasibility Study – Consolidation of the Bywater Bay Water System and the Shine Plat Water System prepared by Washington Project Consultants, PLLC and funded through a grant from the Department of Health (DOH); and

WHEREAS, among other findings, the consolidation study proposed water system improvements needed to be completed prior to the consolidation of the Shine Plat Water System (Water System ID #05820) into the Bywater Bay Water System (Water System ID #02043); and

WHEREAS, in 2017, the PUD was petitioned by the residences of the Shine Plat water system and residences outside the Shine Plat water system to form a Local Utility District (LUD) as the funding mechanism to finance the water system improvements;

WHEREAS, the PUD staff reviewed the petition request and as required by RCW 54.16.140, the petition was signed by ten percent of the owners of land within the LUD boundary;

WHEREAS, pursuant to RCW 54.16.140, the formation of LUD has been initiated by petition signed by ten percent of owners of land as has been provided to the Board of Commissioners of the PUD,

WHEREAS, the Board of Commissioners has accepted the petition, and is establishing a date for the formation of the LUD No. 17; and

WHEREAS, Resolution 2020-024 set a hearing date of March 9, 2021; and

WHEREAS, a new hearing date ~~must be set for~~ March 9, 2021, ~~due to an error in their order to comply with state statutes providing enough time for property owners t protest time hearing vs the time established by RCW for protesting~~ the improvements prior to the hearing; and

WHEREAS, the Board of Commissioners are prepared to re-establish a date for a hearing and adopt procedures consistent with RCW 54.16.140.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of Public Utility District No. 1 of Jefferson County, Washington as follows:

The PUD adopts the \_\_\_ day of March, 2021 as the hearing ~~on~~for the formation of the Shine Plat LUD No. 17. Staff is directed to prepare all notices for publication and final paperwork in the event the petition is successful.

The Board of Commissioners directs the PUD to provide a minimum of two weeks notice to all affected residents of the Shine Plat regarding the formation of LUD No. 17, and further if a majority of the owners of land in the area of the LUD do not file a petition protesting the improvement prior to twelve o'clock noon of the day of the hearing to the secretary of the Board of Commissioners, the Board of Commissioners may adopt a resolution creating LUD No. 17 and further ordering the improvements.

ADOPTED by the Board of Commissioners of Public Utility District No. 1 of Jefferson County, Washington, at a regular open meeting held this 23rd day of February 2021.

\_\_\_\_\_  
Dan Toepper, President

\_\_\_\_\_  
Kenneth Collins, Vice President

ATTEST:

\_\_\_\_\_  
Jeff Randall, Secretary



## AGENDA REPORT

**DATE:** February 23, 2021  
**TO:** Board of Commissioners  
**FROM:** Samantha Harper, P.E., Engineering Director  
**RE:** 2020 Water System Plan (WSP) Update review  
**RECOMMENDATION:** Discussion Only

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**SUMMARY:** Staff would like to discuss the 2020 Water System Plan Update with the Board of Commissioners (BOC) and receive feedback, from the BOC on materials presented in with this Agenda Report and the draft 2020 WSP Update.

**BACKGROUND:** The draft of the 2020 WSP Update is posted on the PUD's website at <https://www.jeffpud.org/water-system-planning/>

On August 25, 2020, staff reviewed with the Commission the content and layout of the 2020 WSP Update Volume 1. Volume 1 is comprised of district policies and standards. On September 10, 2020, staff review with the Commission the content and layout of the 2020 WSP Update Volume 2. Volume 2 is an analysis of each Group A water system. In addition to the WSP content review, on September 23, 2020 the Commission approved by motion the 2020-2025 Water Use Efficiency Goal Program. The presentation of the above-mentioned public meetings can be reviewed on the PUD's website at <https://www.jeffpud.org/water-system-planning/>.

The 2020 WSP Update Volume 1 was submitted to the Washington State Department of Health (DOH) for review on November 17, 2020 with an update on December 21, 2020. The update included the financial chapter of Volume 1. On November 24, 2020, Volume 2 was submitted to DOH. The sequencing of submission to DOH was done in order for the PUD to be eligible to submit applications for the 2020 Drinking Water State Revolving Funds (DWSRF) loan. The PUD staff worked closely with the DOH staff on the submittal of the 2020 WSP Update.

On January 11, 2021, the PUD submitted the 2020 WSP Update to Jefferson County Public Health for Satellite Management Agency (SMA) Review and on January 12, 2021 to Jefferson County Planning Department for Consistency Review with the County's Comprehensive Plan

Also, on January 11, 2021, the PUD provided a mailed notice to all the adjacent and non-adjacent water system purveyors to review the PUD's 2020 WSP Update. No comments were received by the end of the comment period on February 8, 2021.

The State Environmental Policy Act (SEPA) checklist and determination were noticed in the PT Leader, mailed to the SEPA contact list and posted on the PUD's website. To date one comment has received by the Department of Archeological and Historical Preservation (DAHP). The SEPA comment period ends at 5:00pm on February 23, 2021.

The draft Resolution included for the adoption of the 2020 WSP Update is for review only purposes. The draft Resolution shows that in March, the Commissioners will be asked to adopt Volume 1 and the Bywater Bay portion of Volume 2. As stated above, PUD staff coordinated with the State Department of Health to approve Volume 1 and Volume 2 Baywater Bay, to be eligible for the Drinking Water State Revolving Fund loan to support the consolidation of Shine Plat LUD into Bywater Bay. This also means that the Commissioners will see another Resolution for the adoption of the remainder of Volume 2 and Volume 3 of the 2020 Water System Plan Update.

The next steps are the closure of the SEPA comment period, incorporation of DOH comments into the Draft 2020 Water System Plan, BOC adoption of the 2020 WSP Update and then approval by DOH by March 31, 2021.

**ANALYSIS/FINDINGS:** None

**FISCAL IMPACT:** None

**RECOMMENDATION:** Discussion only

Attachments: 1. Draft Resolution for the Adoption of the 2020 WSP Update  
2. Comments and PUD Responses Received to date  
3. JPUD WSP Review-Approval Process Flow Chart

**PUBLIC UTILITY DISTRICT NO.1  
OF  
JEFFERSON COUNTY**

**RESOLUTION NO. 2021-0\_\_**

A RESOLUTION of the Board of Commissioners of Public Utility District (PUD) No. 1 of Jefferson County, Washington adopting the 2020 Water System Plan Update Volume 1 and Volume 2 Chapters 1 (General Methodologies for Individual System Evaluations) and 2 (Bywater Bay Water System).

WHEREAS, Public Utility District No. 1 of Jefferson County (PUD), on the 18<sup>th</sup> of March 1998, by Resolution 98-469, adopted a Comprehensive Water System Plan (WSP) for the District; and

WHEREAS, the PUD in accordance with WAC 246-290 updated its WSP in 2005; and

WHEREAS, the PUD in accordance with WAC 246-290 updated its WSP in 2011 (Resolution No. 2011-008); and

WHEREAS, the PUD in accordance with WAC 246-290 has updated its WSP in 2020; and

WHEREAS, on August 25, 2020, the PUD held a public meeting in which the regulatory framework and the District wide policies in Volume 1 of the 2020 WSP Update were discussed; and

WHEREAS, on September 10, 2020, the PUD held a public meeting in which the technical analysis required by the Washington State Department of Health (DOH) and the analysis methodologies utilized for each of the PUD's nine (9) Group A water systems in Volume 2 of the 2020 WSP Update were discussed; and

WHEREAS, on September 23, 2020, the PUD held a special BOC meeting and public forum in which the Water Use Efficiency (WUE) requirements, the PUD's existing WUE program and the 2020-2025 Water Use Efficiency Goal Program were discussed. In addition, the BOC approved by motion the 2020-2025 WUE Goals; and

WHEREAS, the 2020 WSP Update Volume 1 was submitted to the Washington State Department of Health (DOH) for review on November 17, 2020 with an update on December 21, 2020, and Volume 2 was submitted on November 24, 2020; and

WHEREAS, the PUD staff has updated the 2020 WSP Update to incorporate DOH comments and recommendations; and



WHEREAS, the 2020 WSP Update was submitted to Jefferson County Public Health for Satellite Management Agency (SMA) Review on January 11, 2021 and to Jefferson County Planning Department for Consistency Review with the County's Comprehensive Plan on January 12, 2021; and

WHEREAS, the adjacent water purveyors and non-adjacent water system purveyors were provided notice to review the 2020 WSP Update on January 11, 2021. No comments were received by the end of the comment period on February 8, 2020; and

WHEREAS, the State Environmental Policy Act (SEPA) checklist and determination were noticed in the PT Leader, mailed to the SEPA contact list and posted on the PUD's website. One comment was received by the Department of Archeological and Historical Preservation (DAHP); and

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of Public Utility District No. 1 of Jefferson County as follows:

Section 1. The foregoing recitals are hereby incorporated into this Resolution.

Section 2. The operational policies, procedures, and standards contained within the Public Utility District No. 1 of Jefferson County, 2020 Water System Plan Update, Volumes 1 and 2 (Bywater Bay) dated November 2020 are hereby confirmed, and supercede the PUD's Water System Plan dated February 2005.

Section 3. The 2020 Water System Plan Update, Volumes 1 and 2 Chapters 1 (General Methodologies for Individual System Evaluations) and 2 (Bywater Bay Water System) will go into effect with the approval from DOH.

ADOPTED at a regular meeting of the Board of Commissioners of Public Utility District No. 1 of Jefferson County, this 23rd day of February 2021.

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Dan Toepper, President

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Kenneth Collins, Vice President

ATTEST:

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Jeff Randall, Secretary

DRAFT

## PUD No. 1 of Jefferson County (JPUD)

### Water System Plan (WSP) Volumes 1 and 2 (i.e., Parts A and B)

#### Responses to Comments on Draft WSP Submittals

**\*\*\*NOTE: Comments highlighted in green represent the most significant changes to the Draft WSP. \*\*\***

This document contains responses to comments provided by multiple entities on various components of the JPUD Draft WSP Volumes 1 and 2. The comments are shown below, organized by reviewing entity, with JPUD responses provided underneath each comment **in bold text**.

#### DOH Comments on Part A and Part B (Bywater Bay)

The Washington State Department of Health (DOH) Office of Drinking Water (ODW) provided comments regarding the Draft JPUD Part A WSP and Bywater Bay Water System Part B WSP (ODW Project #20-1114, submitted by JPUD on November 17, 2020). The ODW comments were provided to JPUD in a letter dated January 6, 2021. The responses below are organized according to how the ODW letter was formatted. The **bold text** within a comment reflects what DOH placed in bold for emphasis (as distinguished by the **bold text** following each comment, which is JPUD's response).

#### GENERAL

1. **Please have a licensed engineer sign and stamp this document.**

**The Final WSP, submitted to ODW for approval, will be signed and stamped by a licensed engineer.**

#### CHAPTER 3 – POLICIES, TERMS, AND CONDITIONS

2. Section 3.2.17 Cross Connection Prevention, Paragraph 3. Testing of cross connection control devices must be done by a certified Backflow Assembly Tester (BAT), not a Cross Connection Control Specialist (CCS). **Please revise.**

**The paragraph has been revised per the comment.**

#### CHAPTER 4 – SATELLITE SYSTEM MANAGEMENT

3. General. The SMA plan should be able to be a standalone document but Chapter 4 does not fulfill the entirety of the SMA plan requirements. Some of the SMA plan requirements are included in other portions of this WSP and some are missing. **In order to mitigate that, please address the missing pieces, requested below, and provide a statement at the beginning of this chapter that references the other pertinent locations in the plan that fulfill the requirements of WAC 246-295.**

**A new second paragraph has been added to Section 4.1 referencing locations of the various elements required in WAC 246-295. That paragraph reads as follows:**

**“Volume 1 of the PUD’s Water System Plan contains the required elements of the**

utility's SMA plan. Locations of specific required SMA elements include:

- SMA Service Area Information – Chapter 4.
- Service Area Policies – Chapter 2.
- System Design Standards – Chapter 11.
- Financial Viability – Chapter 9.
- Operation and Maintenance Program – Chapter 10.
- Various SMA Program Documentation – Appendices 4-1 through 4-10.”

See responses to comments below for other specific SMA-related items.

**4. Please provide a written explanation of the SMA service area and a map of the SMA service area. If this area extends beyond Jefferson County, please provide agreements from the other counties' PUDs.**

A new figure has been added to the plan to show the areas currently served by the PUD (Figure 4-1; see enclosed map). The last paragraph on Page 4-1 has been modified as follows:

**“The PUD currently serves as Jefferson County’s only Regional SMA. The PUD’s SMA service area is located fully within Jefferson County, as established in the Jefferson County Coordinated Water System Plan, and is shown on Figure 4-1. The PUD has no agreements or plans to provide service outside of Jefferson County. The PUD owns and operates 13 water systems, as summarized in Table 4-1.”**

See response to Comment 8 regarding the new Table 4-1.

**5. General. Please fill out and provide the attached “Satellite Management Notice of Intent.”**

**This form has been completed and is now included as Appendix 4-10. See enclosed item.**

**6. General. Please provide the SMA consistency form from Jefferson County and any other municipalities you may be currently serving or requesting approval for.** This should be signed by the Health Department in Jefferson County, as opposed to the Local Government Consistency form for the Water System Plan review that is to be signed by the Planning Department of Jefferson County.

**We have requested completion of this form by Jefferson County Health. Once obtained, it will be included as Appendix 4-11.**

**7. WAC 246-295 requires that a copy of each applicable operations contract be submitted during the SMA review. Please submit copies of all current contracts.**

**Copies of all current operations contracts that are on file with the PUD have been included as Appendix 4-12. See enclosed materials.**

**8. Page 4-1, PDF Page 28, Section 4.1, Introduction. This section states that JPUD owns or operates 13 water systems and the Group A systems are located in Table 2-1 of Section 2.**

Table 2-1 of Chapter 2 is the historic population of Jefferson County table, not a table of JPUD water systems. Additionally, WAC 246-295 states that an SMA plan must identify “existing public water systems the applicant currently owns, and/or manages and operates. The identification shall include the number of connections in each system, the department identification number and the system location.” Additionally, “Documentation that all Group A systems owned by the potential SMA on the date of request have obtained their operating permit and are not classified in the red operating permit category pursuant to chapter 246-294 WAC. If Group B systems are also owned by the potential SMA, provide documentation that such systems are following chapter 246-291 WAC.” **In order to comply with the above requirements, please provide a table containing the above information along with the systems name and whether it is a Group A or B.**

**A new table (Table 4-1) has been developed containing the required information and will be included in Section 4.1. The table is as follows:**

**Table 4-1. Summary of PUD Owned and Operated Systems**

Water System	Group A or B	DOH Number	JPUD Role	Current DOH Operating Status <sup>1</sup>	Connections <sup>1</sup>
Bywater Bay	A	02043P	Own	Green	261
Coyle	A	367115	Own	Green	117
Gardiner	A	07877W	Own	Green	131
Lazy C	A	02676T	Own	Green	148
Mats View	A	05536U	Own	Green	24
Quilcene	A	AB292N	Own	Green	40
Quimper	A	05783U	Own	Green	3,462
Snow Creek	A	01220U	Own	Green	50
Triton Cove	A	894470	Own	Green	53
Skywater Estates	B	013241	Own	NA	12
Vandecar	B	00949U	Own	NA	12
Bishop Ridge (Heights Division 2 #1)	B	AB0536	Own	NA	3
Valiani	B	07036A	Own	NA	2
Port of Port Townsend Herb Beck Marina (Quilcene)	A	25931U	Manage/ Operate	Blue	50

<sup>1</sup> DOH Sentry, February 2021.

- Page 4-2, PDF Page 29, Section 4.3, Satellite System Management Program Services. This section states that you offer contract services. While ODW fully supports JPUD to provide contract services, it does not fit within the definition of what we require for a system that is required to be run by an SMA. It only meets that definition if that contract includes all of the responsible charge duties. **Please provide a list of systems that JPUD has contracts with where that contract does not meet all of the responsible charge duties.**

See table in response to Comment #8.

## CHAPTER 5 – WATER USE EFFICIENCY PLAN

10. Page 5-7, PDF Page 42, Section 5.8, Water Use Efficiency Goals. Water Use Efficiency goals must be set through a public process, in a public forum. **Please provide a copy of public meeting notification, meeting agenda, and the signed meeting minutes of the meeting when the WUE goals were set or reference the section of Volume II where they are located.**

**This information has been compiled and included as Appendix 5-1. See enclosed materials (3 separate items).**

11. Page 5-9, PDF Page 44, Section 8.8.2, Supply-Side Goals. This section references the requirement that Distribution System Leakage must be 10 percent or less. **Please list any water systems that are above a 10 percent DSL.** You can fulfill the necessary WUE requirements for the systems over 10 percent DSL in each individual Part B Water System Plan.

**As noted, this is discussed on a system-by-system basis in Part B. Those systems that are currently over 10 percent DSL are: Coyle, Gardiner, Mats View, and Triton Cove.**

## CHAPTER 7 – LOCAL LAND USE AND RELATED PLANS

12. Page 7-1, PDF Page 58, Section 7.1, Introduction. This section states that the Local Government Consistency (LGC) checklists are provided in Volume II of this WSP. An LGC must be performed and signed for both Part As and Part Bs. **Please provide an LGC for this submittal.**

**We have requested completion of this form by Jefferson County. Once obtained, it will be included as Appendix 7-1.**

13. Page 7-4, PDF Page 61, Section 7.3.5. Many WRIAs that were previously inactive have become active in the past year because of the Hirst Decision. **Please confirm that the statement that both WRIA 16 & 17 are inactive is still accurate.**

**This has been confirmed. WRIAs 16 and 17 are not currently conducting planning activities.**

## CHAPTER 8 – IMPROVEMENT PROGRAM

14. General. JPUD is a regional provider in Jefferson County. In order to make sure JPUD is eligible for SRF funding for *future* consolidations, it may be wise to add a statement in this section of the plan that states it is your intention to be the regional provider for Jefferson County. **Please see below examples and update this chapter to include appropriate language.**

*“We are committed to providing safe and reliable drinking water within the approved SMA service area and are willing to consider consolidating any Group A and Group B*

*water systems within our service area. At times this may require us to obtain funding to upgrade the facility to our standards. All consolidations would need to meet our connection policies, ordinances, and/or resolutions.”*

Or

*“Subject to financial and operational capabilities, and approval of its Board of Commissioners, the PUD is willing to consider the acquisition of water systems, within our approved SMA service area, at any time. Although new water systems must come into the PUD “whole” and “up to standard”, the PUD may try to find funding that may need to be completed to help the system meet the PUD’s standards. It will be the restructured water system’s customer’s responsibility to pay back any loan the PUD has signed for the improvements to their water system, in accordance with the PUD policies, as may be hereafter amended.*

*Once the PUD acquires water systems then the major upgrades will be added to the PUD’s Capital Improvement Plan. The PUD intends to and may submit loan requests and packages to the State of Washington Department of Health, Office of Drinking Water for Drinking Water State Revolving Fund loans and Drinking Water System Repair and Consolidation (DWSRC) grants for water system upgrades the PUD is considering acquiring as part of the transition into the PUD ownership and management.”*

The second example text above has been incorporated into the text on Page 8-1.

## CHAPTER 9 – FINANCIAL PROGRAM

15. General. Please include a narrative of the way that the COVID 19 has affected your cash flow and financial program.

COVID 19 has not significantly affected JPUD’s financial program. Some customers have been slower to pay, but no analysis has been done to discern trends or differences amongst rate classes or between systems.

16. Page 9-20, PDF Page 87, Table 9-8, Existing Schedule of Rates. This table represents a residential discount category. Please provide a copy of this discount program or provide a narrative of the program, including eligibility.

In 2017, the PUD’s Board of Commissioners passed Resolution 2017-002 which established a Low Income Rate Reduction Program. Since 2017, the Low Income Rate Reduction Program has been updated and currently the PUD offers three types of rate reductions in the form of monthly credits for customers who qualify for low income assistance. The three types of rate reduction are a standard; senior; or water/sewer program. The customers who qualify for the standard or senior low income electric bill credit also qualify for water/sewer low income assistance.

The qualification for the Standard low income bill credit is that the household income must not exceed 150% of the federal poverty level. There are various deductions and exclusion allowed for different types of incomes. The qualifications for the Senior low income bill credit are the customer must be 62 years of age or older; their total household income after deductions does not exceed the limit prescribed by RCW 84.36.381(5)(b)(ii); and the combined disposable income for the

**members for the household must currently be \$30,000 or less.**

**Once the customer's eligibility is approved, the customer will receive a credit each month on each of their qualifying accounts for a period of one year (for the Standard program) and two years (for the Senior Program). Once the period is expired the customer will be required to reapply.**

**For more information on the PUD's Low Income Program, please visit our Low Income Program FAQs website at <https://www.jeffpud.org/assistance/low-income-faqs/>.**

- 17. Page 9-10, PDF Page 88, Table 9-9, Schedule of Proposed Rates. This table, as well as the existing schedule of rates, shows that 0 water is included with the base rate and that the lowest tier is 0-5000 gallons monthly. Please explain the reasoning behind this.**

**This rate structure was set in place over 10 years ago and was constructed to encourage conservation, in that the customer must pay for every increment of water used, as opposed to including a set amount of water within the base rate which would not encourage conservation. In addition, this structure mirrors the rate structure for JPUD's electric utility.**

- 18. Page 9-22, PDF Page 89, Section 9.6, Affordability. Please note that using the benchmark of 2.5 percent (or 2 percent, but 2 percent is traditionally for wastewater programs and 2.5 percent is for water) of the MHI is becoming an outdated benchmark in the affordability sector. It may still be used for various loans and grant programs but is no longer adequate to address the actual impact of rates on customers. Please provide a narrative about how you address customer affordability concerns at the PUD. Please include your CAP program that complies with Governor Proclamation 20-23.7 to address COVID 19 financial impact on your customers.**

**Please see the response to Comment 16. In addition, information about the PUD's payment assistance programs, including our COVID-19 support program in response to Proclamation 20-23, is readily available to customers at this website: <https://www.jeffpud.org/assistance/>.**

## **CHAPTER 10 – WATER SYSTEMS OPERATION PROGRAM**

- 19. Section 10.3.4 Reservoirs. Please inspect hatches & gaskets at least annually to ensure pests and debris do not enter tanks.**

**A new bullet has been added to the bottom of the Annual list in Section 10.3.4: "Inspect hatches and gaskets".**

- 20. Chapter 10, Emergency Response Plan. Please provide a Water Shortage Plan.**

**The Water Shortage Response Plan has been included as Appendix 10-4.**

## **CHAPTER 11 – TECHNICAL STANDARDS AND SPECIFICATIONS**

- 21. Chapter 11, Specifications. Please change to include the requirement that all chemicals meet NSF 60.**



The following sentence has been added to the end of the paragraph in Section 11.3.1: “All drinking water treatment chemicals must meet the requirements of NSF 60.”

## BYWATER BAY WATER SYSTEM PLAN PART B

1. General. Please provide a letter from the fire authority they are okay with the lack of fire flow until improvements can be made.

We have coordinated with Port Ludlow Fire and Rescue. Documentation will be included as Appendix 2-4.

2. General. Each water system should start integrating components of an Asset Management Program into their plan. **If Bywater Bay has an asset management plan, please provide it. Otherwise, please provide an asset inventory that includes the component, installation date, life expectancy, remaining life, condition rating, criticality number, and replacement cost.**

**The PUD has compiled an asset management plan worksheet for this system. It will be included as Appendix 2-5.**

3. Page 2-4, Figure 2-1: Bywater Bay Water System Map. Each service area should have 3 different service areas clearly labeled; future service area, retail service area, and service area (which equals the water rights place of use). Additionally, I am unable to tell where neighboring water systems are or where Shine Plat is from the map provided. **Please update this map to include all three service areas and either update this map with boundary lines for neighboring water systems and boundaries of Shine Plat, or provide an additional map with that information.**

The PUD has updated the map per the comment.

4. Page 2-6, Section 2.2, Population and Demand Forecast. The estimated population provided in Table 2-6, for 2017, is higher than what is provided on the current Water Facilities Inventory form, while the connection count is lower. **Please provide an updated WFI that is consistent with the values in Table 2-6.**

The PUD has updated the WFI per the comment. This will be included as Appendix 2-6.

5. Appendix 2-3 – Bywater Bay Water System Water Quality Monitoring Plans. The coliform monitoring plan was last updated in 2004 and is inconsistent with the Revised Total Coliform Rule (RTCR) and Groundwater Rule (GWR). Since 2004, the number of connections this system serves has double. **Please revise the CMP to be consistent with the RTCR and GWR and up to date with system operations.**

The PUD has updated the Coliform Monitoring Plan per the comment and per the RTCR and GWR requirements. This will replace the draft version of Appendix 2-3.

**DEPARTMENT OF ECOLOGY**

*ODW's review of your WSP does not confer or guarantee any right to a specific quantity of water. Our review is based on your representation of available water quantity. If the Washington Department of Ecology, a local planning agency, or other authority responsible for determining water rights and water system adequacy determines that you have use of less water than you represent, the number of approved connections may be reduced commensurate with the actual amount of water and your legal right to use it. A copy of this document was sent to Ecology on November 18, 2020.*

Marie Peter, from the Department of Ecology, issued an e-mail on January 4, 2021, stating she has no concerns with this Part A WSP.

**Comment noted.**

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## **Ecology Comments on Part B**

The Washington State Department of Ecology (Ecology) provided comments regarding the Draft JPUD Part B WSP (DOH ODW Project #20-1121, submitted by JPUD). The Ecology comments were provided to JPUD and DOH in a letter dated January 25, 2021. The responses below are organized according to how the Ecology letter was formatted.

### **Water Rights**

The water rights for all Jefferson County Public Utility District 1 (Jefferson PUD) water systems are accurately reflected in the water right tables, Water Rights Self-Assessment forms, and other areas of the Water System Plan. Water right conditions of operation are also clearly addressed throughout the Plan. The water right adequacy assessment for each system based on projected future demand appears to be consistent with these records.

**Comment noted.**

### **Water Use Efficiency**

The PUD's conservation and water use efficiency planning goals and efforts appear to be generally adequate and adjusted appropriately for system size, system-specific issues, and availability of resources.

**Comment noted.**

### **Bywater Bay System**

Although, as noted in the Plan, the water right permit for the Shine Well requires monitoring of nearby wells as a condition of operation, this right is no different from any other water right in that development of inchoate quantities must not exceed the safe and sustainable yield of the supplying aquifer or impair senior water rights. With the recent authorization of the Reynolds Well under Permit G2-28632, the Bywater Bay system now has additional source redundancy to help guarantee uninterrupted service if data trends indicate the need to regulate withdrawals in the future.

The draft Report of Examination for the Reynolds well included in the appendix should be replaced with the final signed report.

**The appendix will be updated per the comment.**

### **Coyle System**

Due to concerns regarding seawater intrusion on the Toandos Peninsula, chloride levels in the Coyle well should be monitored regularly and the extremely high distribution leakage should systematically be reduced as a high priority as resources become available.

**\*\*\*PUD staff are discussing the response related to the chloride monitoring comment.\*\*\***

**As noted in the CIP for the Coyle system, JPUD intends to replace leaking distribution system piping over time, as resources are available.**

### **Quimper Water System**

Because the Quimper system serves more than 1,000 connections, this draft plan needs to be revised to more thoroughly address the requirements of RCW 90.03.386(3)(c) by describing "the projected effects of delaying the use of existing inchoate rights" during the 10-year planning horizon "through the addition

of further cost-effective water conservation measures”. This is especially important to address for sources in the Chimacum Creek sub-basin.

**The Plan narrative regarding water conservation will be expanded to address this comment, noting how additional conservation measures have been considered.**

Although two water right applications are on file for the Quimper system, Jefferson PUD is keenly aware of the challenges in obtaining approval of new water rights. Since the adoption of the Quilcene-Snow Water Resource Inventory Area (WRIA 17) Watershed Management Plan and Detailed Implementation Plan in 2011, transfers and changes to existing water rights have also become much more difficult to approve. However, Ecology recognizes the importance of the PUD’s role as a regional water supplier promoting the efficient use of the area’s limited water supplies and is committed to helping the PUD find solutions to meet future Quimper system demand.

**Comment noted.**

**Lazy C Water System**

The Temporary Permit authorizing use of Lazy C Well 4 will remain in effect until a final decision is issued on Water Right Application G2-29265. Although Ecology was initially concerned about high chloride concentrations in this well, water quality data collected over an extended period of time has not shown any problematic trends. This well may continue to be relied on as the primary source for the Lazy C system as long as the water level and water quality monitoring requirements of the Temporary Permit are complied with.

**Comment noted.**

The Plan indicates that Jefferson PUD may be filing change applications under the existing water rights for Lazy C Wells 1 and 2 to transfer the points of withdrawal down-gradient in order to more readily supply the system’s future service area. A change application filed for this purpose may qualify for expedited processing under WAC 173-152-050(2)(d). However, the PUD is advised that transfers and changes to existing rights, even if downstream and within the same body of groundwater, may require mitigation depending on the new location. We recommend that the PUD request a pre-application consultation with Ecology staff prior to filing these applications.

**Comment noted.**

**Quilcene Water System**

Additional water rights will soon be required for the Quilcene system. In accordance with the Instream Flow Rule for WRIA 17, access to water from the Big Quilcene sub-basin reserve may be approved for the US Forest Service well and future well(s) under pending Water Right Application G2-29120 subject to a public interest evaluation that takes into account water availability for future domestic use in the sub-basin.

**Comment noted.**

**Mats View Water System**

The Plan indicates that Jefferson PUD would consider additional exempt well right consolidations to the Mats View system if property owners agree to decommission their wells upon connection to the system. Because decommissioning is a statutory requirement for approving consolidations of permit-exempt rights, we appreciate the PUD taking this step to ensure accountability for decommissioning prior to filing applications.

**Comment noted.**

**Watershed Planning Considerations**

Chapter 173-517 WAC was adopted in 2009 to protect WRIA 17 streams under RCW 90.54.040(1) and the WRIA 17 Watershed Management Plan and Detailed Implementation Plan adopted in 2011 covers the locations of all PUD water system service areas except for Lazy C and Triton Cove. In accordance with RCW 90.03.386(2), the Draft 2020 Jefferson County PUD Water System Plan is determined to be “not inconsistent” with the Comprehensive Watershed Plan for WRIA 17 adopted under RCW 90.54.040(1) after September 9, 2003.

**Comment noted.**

A Watershed Management Plan for the Skokomish-Dosewallips Water Resource Inventory Area (WRIA 16) was adopted in 2006 and a Detailed Implementation Plan in 2008, covering the Triton Cove and Lazy C water system service areas. This Water System Plan is also “not inconsistent” with the WRIA 16 Watershed Plan.

**Comment noted.**

## **Jefferson County Public Health Comments on Parts A and B**

Jefferson County Public Health (County Health) provided comments regarding the Draft JPUD WSP. The County Health comments were provided to JPUD in an email from Susan Porto (Environmental Health Specialist 3) dated February 8, 2021. The responses below are organized according to how the County Health email was formatted.

The following are my comments/observations:

- I am curious about the SIPZ portion, and would appreciate seeing the information you plan to provide per VOL 1 7.3.7 (I think).

### **Information provided in WSP Volume 1 Chapter 7.3.7**

- There is only one typo that I found, and that I'm not sure anyone cares about-Vol 1 2.6.3, correct Lake Beaumont to Lake Beausite.

### **Noticed will correct**

- Joel and I noticed on the Bywater service area map, see below, that the future service area leaves approximately 3 parcels between your service area and JCWD#1 and that area is slightly different than the existing serve area map in the plan from 2011. Was there a reason to leave those few lots out of a future area? Also the description in the Bywater system has the Reynolds well as one of three wells serving the system. Have you gotten approval for DOH for additional capacity yet? What is the plan for the two Shine Plat wells once you expand into that area?

**Better to include that whole block of parcels between JCWD #1 and Bywater Bay as future service area. Unsure why changed from the 2011, PUD staff to review.  
Regarding Reynolds well, DOH approved the source, expanded system capacity approval through water system plan.  
Not sure about Shine Plat wells. They will remain private property.**



- The Gardiner service area seems to have changed from prior maps in the area shown below, is that right?  
**PUD staff to review.**



- And thanks for correcting Quilene's area-where the service area bisected the parcels.  
**Comment noted.**

## **SEPA Comments on Parts A and B**

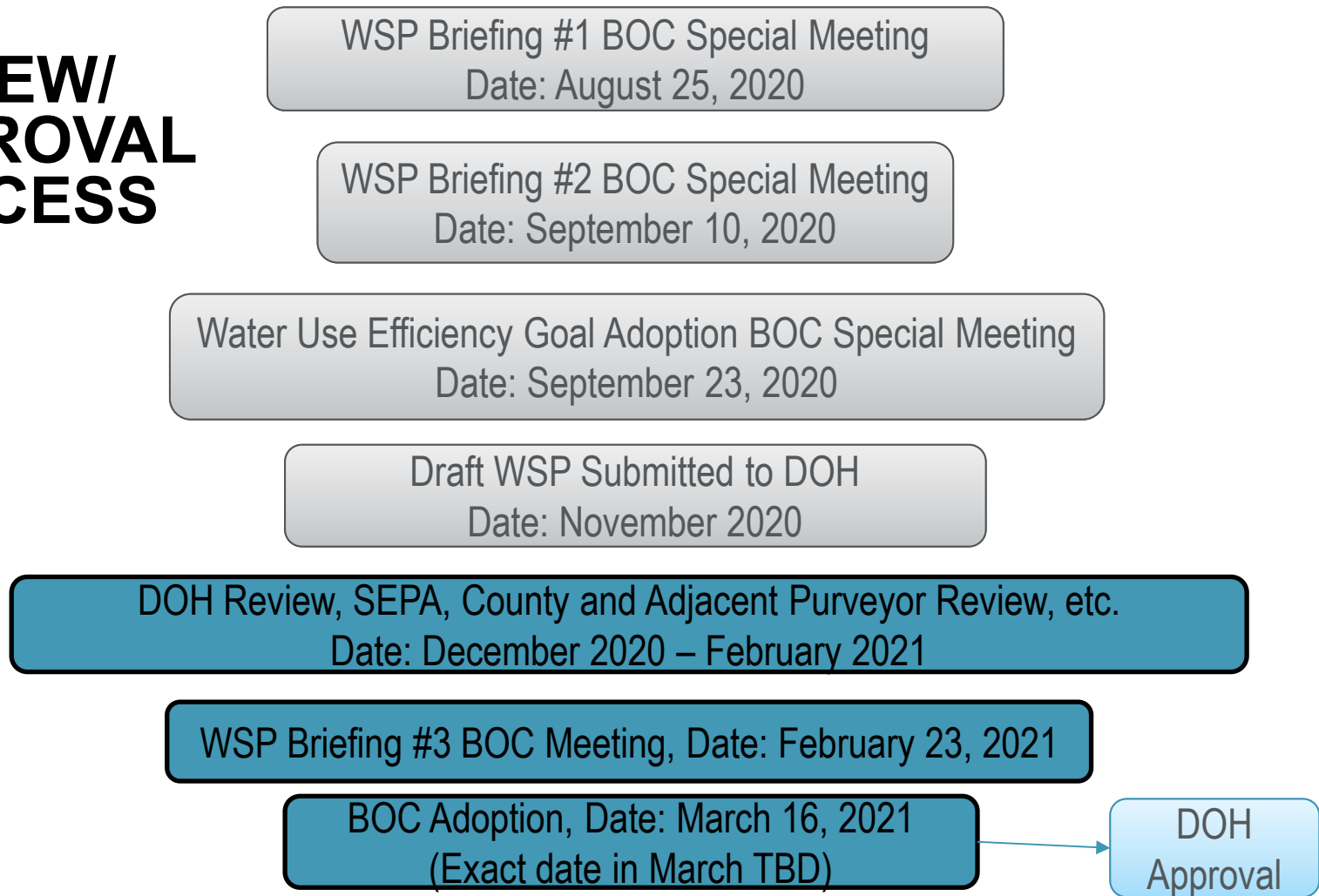
Below are comments received through the SEPA process relating to the WSP.

- **Department of Archaeology & Historic Preservation (DAHP).** Email from Stephanie Jolivet (Local Government Archaeologist), 2021-02-16.
  - Thank you for providing the link to the SEPA checklist. Because this is a non-project action the DAHP has no specific concerns at this time. However, many of the proposed project areas are in high risk areas for archaeology, so I look forward to reviewing those projects as they come out in the future.

**Comment noted.**



# REVIEW/ APPROVAL PROCESS



**PUD NO. 1 OF JEFFERSON  
COUNTY 2020 WATER SYSTEM  
PLAN REVIEW  
BOARD BRIEFING #3**

**PRESENTED BY: SAMANTHA HARPER, P.E., PUD  
BILL GRAHAM, PUD  
JEFF HANSEN, P.E., HDR**

**FEBRUARY 23, 2021**



# BRIEFING OUTLINE

- Review of Water System Plan Organization
- Water System Plan Review/Approval Process
- Review of Draft Resolution
- Summary of Comments Received
- Next Steps
  - Board Adoption – Planned for March 16
  - DOH Approval – By end of March

# JPUD WSP ORGANIZATION

- Volume 1: District-Wide Information
  - General, programmatic elements
- Volume 2: System-Specific Information
  - Technical analysis related to each water system
  - Chapter dedicated to each of 9 Group A Water Systems
- Volume 3: Wellhead Protection Program
  - Management and protection of groundwater sources

In March, the BOC will be asked to adopt **Volume 1 and the Bywater Bay portion of Volume 2**. This is needed for the State Department of Health to approve these components, which in turn is a requirement of obtaining the Drinking Water State Revolving Fund loan to support consolidation of Shine Plat into Bywater Bay.

# REVIEW/ APPROVAL PROCESS

WSP Briefing #1 BOC Special Meeting  
Date: August 25, 2020

WSP Briefing #2 BOC Special Meeting  
Date: September 10, 2020

Water Use Efficiency Goal Adoption BOC Special Meeting  
Date: September 23, 2020

Draft WSP Submitted to DOH  
Date: November 2020

DOH Review, SEPA, County and Adjacent Purveyor Review, etc.  
Date: December 2020 – February 2021

WSP Briefing #3 BOC Meeting, Date: February 23, 2021

BOC Adoption, Date: March 16, 2021

DOH  
Approval

# QUESTIONS/DISCUSSION