

JEFFERSON COUNTY BOARD OF COUNTY COMMISSIONERS

AGENDA REQUEST

TO: Board of County Commissioners
Mark McCauley, County Administrator

FROM: Brent A. Butler, AICP, Chief Strategy Officer

DATE: January 16, 2024

SUBJECT: Coordinated Water System Plan & Water Utility Coordinating Committee

STATEMENT OF ISSUE:

Last updated in 1997, the Jefferson County Coordinated Water System Plan (“CWSP”) requires revisions to incorporate new water law and implement best practices. Generally, the required procedures are contained in the Washington Administrative Code (WAC), Chapter 248-56 WATER SYSTEM COORDINATION ACT—PROCEDURAL REGULATIONS. Companion provisions address the community’s need for fire-protection in Chapter 248-57 WATER SYSTEM COORDINATION ACT—FIRE FLOW REGULATIONS. While the CWSP should consider the water infrastructure needs over a 50-year planning horizon, it must meet a minimum 20-year planning horizon.

The process to update the CWSP requires that the Water Utility Coordinating Committee (“WUCC”) convene to review and recommend a new or updated CWSP to the Board of County Commissioners (“BoCC”). To ease CWSP development, staff recommends repealing resolutions and any other documents forming the currently constituted WUCC, and directing staff to establish a streamlined committee consisting of seven members in accordance with WAC 246-293-150, as set forth in *Attachment 1*. As proposed, the members would include one person from each of the following organizations

TABLE 1: Proposed Water Utility Coordinating Committee

Member (Position Number)	Alternate	Required or Optional
(1) County Commissioner,	Determined by BoCC	Required
(2) Jefferson County Public Health Director,	Determined by PH Director	Required
(3) Jefferson County Community Development Department (DCD) Director,	Determined by DCD Director	Required
(4) City of Port Townsend Public Works Director	Determined by City Public Works Director	Optional Member (Water purveyor with over fifty services within the declared area)
(5) Public Utility District Number 1 General Manager	Determined by PUD General Manager	
(6) Olympic Sewer and Water, Inc. President	Determined by the President of the Port Ludlow Associates	
(7) Stakeholder Representing a Group A or group B water utility or both or, alternatively, a member of the WUCC prior to the repeal	Determined by the BoCC upon solicitation of sunseting WUCC members and Group A and B Water Purveyors	

A scope of work (“SOW”) to establish a new CWSP is in development with the assistance of a water planning team consisting of county staff, water purveyors, the Washington State Department of Health, and Jefferson County Public Environmental Public Health (“EPH”). Once completed, the SOW will be published in the Seattle Daily Journal of Commerce to solicit proposals from consultant firms, which will assist the planning team to determine the overall CWSP update cost. Meeting notes of prior meetings are included as *Attachment 2*.

BACKGROUND:

The “Water Resources Act” of 1971, RCW 90.54, sets forth Washington State’s fundamentals for water resource management intended to ensure that the waters of the state will be protected and fully utilized for the greatest benefit to the people of the state. The [Public Water System Coordination Act of 1977](#) (PWSCA) created Critical Water Supply Service Areas (CWSSA) in Washington State because "an adequate supply of potable water for domestic, commercial, and industrial use is vital to the health and well-being of the people of the state," [RCW 70.116.010](#). The designation of a CWSSA confirms that a study of a geographical area demonstrates that water supply problems related to uncoordinated planning, inadequate water quality or unreliable service appears to exist.

On October 24, and December 12, 1983, the BoCC formally adopted resolutions 97-83 and 118-83 respectively, accepting the Jefferson County PUD’s preliminary assessment of problems related to public water supply service, and the WUCC’s recommendation to confirm and legally establish the limits of the critical water supply service area as the whole of Jefferson County. These resolutions endorsed the findings of the preliminary assessment of more than 60 representatives of public water systems in Jefferson County, PUD, staff and other interested parties discussed on September 27, 1983. This initiated water planning, engineering, and technical analysis that led to the county’s first CWSP, which the BoCC adopted by resolution 13-86 on January 23, 1986.

In 1995, the BoCC adopted resolution 79-95 formally establishing the WUCC’s roles and responsibilities and later declared by resolution 93-95 that the CWSSA boundaries were true and correct, as recommended by the WUCC.

CWSP

- Provides maximum integration and coordination of public water system facilities
- Is the coordinating document that provides policy recommendations
- Helps coordinate delivery of water of Group A water systems
- Sets framework and process of water system review plans
- Identifies future demand and if there are sufficient water rights to meet demand
- Sets minimum standards for fire flow

ANALYSIS:

As more fully set forth in the October 23, 2023 agenda request on this topic, the Jefferson County Public Utility District No. 1 (“PUD”) continues to identify water supply problems related to uncoordinated planning, inadequate water quality or unreliable service in part due to the failure to update the CWSP.

FISCAL IMPACT/COST-BENEFIT ANALYSIS:

The funding available from the State Department of Commerce for the 2025 Comprehensive Plan Periodic Update would not be sufficient to update the CWSP, and therefore an alternative source of funding would be necessary. As shared previously, the most significant challenge identified for the CWSP update is cost and staff capacity. Many jurisdictions establish funding in one of three ways. (1) represented parties of the proposed water utility coordinating council would each contribute to the cost of a CWSP update, (2) the county uses the general fund to pay for the update, (3) a taxing district is established. E.g., Whatcom County Flood Control District (FCD) was established in the early 1990s and includes in its permissible uses costs for (a) Stormwater, (b) Flooding, (c) Coordinated Water System Plan creation and updates and water-related natural resource activities such as protecting shellfish beds. King and Pierce counties have FCDs; a stormwater utility, however, is the more common use.

Upon completion of the CWSP scope of work, staff will publish a request for proposals (RFP) to obtain cost estimates to hire a consultant to update the plan. At that point, staff will return to the BoCC with a comprehensive plan to fund the update. Nonetheless, preliminary work can be undertaken in the interim period to establish a new committee for this significant update.

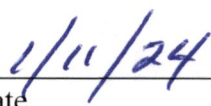
RECOMMENDATION:

After accepting public comment, direct staff to:

- (1) Recruit from the existing WUCC members, beginning a transparent public process to obtain a WUCC member for position number 7, as identified in Table 1, and if no WUCC member is interested, open the position to any existing Group A purveyor in Jefferson County with experience and understanding of the unique challenges facing Group B systems; and
- (2) Submit a resolution as part of its regular consent agenda repealing resolutions and actions formally appointing the existing WUCC to establish a new WUCC, as set forth in Table 1 of this agenda request.

REVIEWED BY:


Mark McCauley, County Administrator


Date

Attachment 1 – WAC 246-293-150

Chapter 246-293-150 Water utility coordinating committee—Establishment.

- (1) Within thirty days following the declaration of a critical water supply service area, a water utility coordinating committee composed of not less than three voting members shall be appointed by the declaring authority.
- (2) The water utility coordinating committee shall consist of one representative from each of the following:
 - (a) County legislative authority within the declared area;
 - (b) County planning agency having jurisdiction within the declared area;
 - (c) Health agency having jurisdiction within the declared area under chapters 70.08, 70.05, 43.20 RCW; and
 - (d) Water purveyor with over fifty services within the declared area. (Other interested persons may be appointed as nonvoting members of the committee by the authority declaring the critical water supply service area if determined appropriate.)
- (3) At the first meeting of the water utility coordinating committee, the following shall be determined:
 - (a) Chairperson; and
 - (b) Rules for conducting business, including voting procedure.

Attachment 2 - Meeting notes (October 27, 2023 and January 5, 2024)

DATE: January 5, 2024

FROM: Brent A. Butler, Chief Strategy Officer

TO: Nikki Guillot, Source Water Protection Program Manager, Office of Drinking Water, DOH; Alisa Hasbrouck, Environmental Health Manager, Jefferson County Department of Environmental Public Health; Ben Majors, Environmental Planner, SW Region, Office of Drinking Water, Washington State Department of Health; Kevin Streett, Executive Director, Jefferson County, Public Utility District (PUD) #1;

RE: January 4th Meeting Notes – Coordinated Water System Plan (CWSP)
Planning Meeting Number 2

DRAFT AGENDA -Brent shared the draft agenda, and requested amending it by including information about initial kickoff steps

1) Initial Steps to kick off the process

- There was a discussion about the benefit of adding guidance for Class B water systems to the CWSP
- Ben Majors shared examples, e.g., Class B system best practices, including Grays Harbor's program, which has a simple and robust Class B program that's compliant with Chapter 246-291 Washington Administrative Code (WAC), as adopted into a county ordinance, and scaled down.
- Ben also shared that Clallam County is in the process of getting a class B ordinance passed, and shared that outside of these two counties, there's a wide range and that many of the other communities have systems that are more complicated. In many cases, you have small HOA, and the more complicated that it gets the less that they'll be able to get involved.
- Brent asked if Class B should be included in the WUCC – and Ben mentioned that the discovery bay leaseholders, Dale Metzger, Tundra Water, may be a good person as he's been involved in both A and B.
- Kevin shared that the PUD owns some B systems, and that there needs to be better regulation regarding these systems from the PUD's standpoint and that doing the minimum isn't enough.
- Alisa stated that not regulating Group Bs is a weak link in public health, and the FPHS Drinking Water core team is working to develop guidance for local health jurisdictions that plan to begin regulating Group Bs.

2) Funding Needs

- Brent shared the need to complete the scope of work and to issue an request for proposal to identify the project cost.
- Nikki stated that when DOH initially conducted outreach for CWSPs, they had seed money but that this didn't extend to the updates for which there hasn't been any money. Because it's been such a long time since the last update for many CWSPs, the changes are more likely major overhauls. This is the problem. Nikki's other comments included:

- DOH grant programs do not fund minimum requirements, however, DOH wants to support this. If there are priorities that e.g., nitrates, water rights, water use sufficiency, that exceed the minimum there could be funding, e.g., source water protection, regional monitoring, modeling groundwater, and public outreach.
- Minimum requirements cannot be funded.
- DOH can help with updating the CARA ordinance.
- Depending upon the community interest, these are grants not loans that would be available on a non-competitive basis
- Unsure of the monies available in Foundation Public Health
- \$500K is provided to the source water fund and in the past Thurston County received \$150K as there's was countywide
- Countywide initiatives, above the minimum standards could be funded
- Kevin stated that this (CWSP update) is very important to the PUD, and he further stated
 - PUD is spending a lot of resources on water rights and system operations.
 - There's an expectation that the county would pay some of the update costs. The county has to get this update correct. This is a county project, so part of the funding has to come from the county, and cannot come from the Users.
 - Eastern Jefferson County, regardless of whether it's Cape George – we know that there are failing systems and contaminants, and the PUD will be willing to pay its fairshare.
 - The 400K amount is likely high for the update. The PUD legal team is working on the PUD's water rights, and Kevin will bring this to the team.
 - Between the county and the PUD, funds should be available.
 - The smaller systems haven't any money to provide for the system update. The PUD is willing to contribute.

a) Scope of Work (timeline) –

- Brent shared that:
 - An agenda item will be presented to the Board of County Commissioners on January 15, 2024 (actually, January 16, 2024 because of the MLK Holiday)
 - County will propose a newly reconstituted Water Utility Coordinating Committee (WUCC) established with a maximum of 7 or 8 members.
 - Initial concept of having the following persons as WUCC members, the first four of which are required pursuant to WAC 246-293-150 guidelines;
 - Greg Brotherton, Jefferson County Commissioners;
 - Josh Peters, Department of Community Development Director;
 - Apple Martine, Jefferson County Public Health Director;
 - Kevin Streett, Executive Director of PUD#1
 - Olympic Water and Sewer (President or Vice President)
 - City of Port Townsend, Steve King, Director of Public Works
 - Class A / Class B System Water Utility Purveyor (TBD)

b) Release of Scope of Work (SOW) – January 22 release

- a. Brent stated that the agenda lists several scopes of work, as set forth below, and that some of which are for water system plans, as opposed to coordinated water system plans.
 1. https://westlinnoregon.gov/sites/default/files/fileattachments/public_works/project/54829/west_linn_-_wsmp_-_draft_scope_and_fee_approved.pdf
 2. <https://www.piercecountywa.gov/DocumentCenter/View/68653/Rfq-2036-Coordinated-Water-System-Plan-CWSP-Update-Final?bidId=>

3. <https://clark.wa.gov/sites/default/files/dept/files/community-planning/2020%20Approved%20Work%20Plan%20FINAL.pdf>
4. <https://www.whatcomcounty.us/DocumentCenter/View/20431/ab2016-192?bidId=>

- Kevin stated that the PUD was meeting with their attorneys, and that they would ask if they had any SOW for CWSPs that could be shared in response to Brent's request that if any of the attendees had access to a sample Scope of work(s) to provide it
- Alisa shared that if any party bidding submits SOW content, it may give them an 'unfair advantage' so there's a need to be cognizant of this issue.

c) SOW content

- a. Brent shared that there's a need for a consistency review, which should include at a minimum the following
 - i. Jefferson County (County) County Comprehensive Plan (including land use plans and adopted subarea plans, as applicable);
 - ii. Jefferson County Shoreline Master Plan;
 - iii. WRIA 1 Watershed Management Plan;
 1. WRIA 16 - Skokomish/Dosewallips.
 2. WRIA 17 - Quilcene/Snow.
 3. WRIA 20 - Sol Duc/Hoh.
 4. WRIA 21 - Queets/Quinault (No planning activities at this time)
 - iv. Total Maximum Daily Load studies (TMDLs).
- b. Mandatory Elements – Brent shared that he's identified these minimum requirements, and that he's researching if there are more.
 - i. RCW 36.70A.070
 - ii. RCW 90.54
 - iii. RCW 70.116
 - iv. WAC 173-527
 - v. WAC 173-528
 - vi. WAC 173-590
 - vii. WAC 248-56
 - viii. WAC 246-290 – regulations governing Group A public water systems
 - ix. WAC 246-293
 - x. SSB 6091
- c. Water rights -
- d. Public Health concerns
 - i. PFAS
 - ii. Nitrates
 - iii. Regional water use efficiency.

DATE: October 27, 2023

FROM: Brent A. Butler, Department of Community Development
Jefferson County, Chief Strategy Officer

TO: Tom Aumock; Fire Code Official (Independent Contractor); Phil Cecere, Jefferson County Fire Marshal/Building Official; Amanda Christofferson, Jefferson County Grants Administrator; Emma Erickson, Jefferson County Environmental Health Specialist II; Bill Graham, Public Utility District (PUD) Resource Manager; Nikki Guillot, Office of Drinking Water, Washington State Department of Health (DOH) Source Water Protection Program Manager; Pinky Mingo, Jefferson County Environmental Public Health Director; Joel Peterson, Jefferson County Associate Planner Lead; Scott Pollock, Regional Engineer, DOH

RE: Coordinated Water System Plan Update

The meeting occurred on October 24, 2023 from 2:30pm to 3:30pm with above referenced parties. The agenda, included (1) Introductions; (2) Coordinated Water System Plan update needs; (3) Scope of Work areas; (4) Grants and Funding opportunities and how to use available funds to address quantity and quality issues.

Summary of comments and input from the various parties are listed below:

Bill Graham shared some key points, including:

- Coordinated Water System Plan (CWSP) lacks context, and needs to be updated to reflect current laws, see <https://app.leg.wa.gov/rcw/dispo.aspx?Cite=70.116>
- Previously, the Department of Community Development (DCD) managed the process on behalf of the county, and implemented Washington State standards
- The CWSP guides water system planning – basically for new and existing water utilities, and its demand, e.g., Shine Plat 2 which has been coordinated with the county so that there's consistency and compliance.
- In many cases, the CWSP will use the same text.
- Utility service review process is ambiguous,
 - PUD is a Satellite management Agency. Per the [Water System Planning Guidebook](#), “a Satellite Management Agency (SMA) is a person or entity that owns or manages and operates public water systems without the necessity for a physical connection between the systems.”
 - Water sufficiency for utilities,
 - Plan is aspirational, says that the county is going to do several things
- CWSP references a fire ordinance that does not appear to exist;
- CWSP identifies various processes that we follow which are outdated, e.g., PUD was the lone entity in the county; and as such would be leaned on for services, and this is no longer true.
- WUC needs to be convened for this update to occur. The more time that passes, the harder it is to address. Bill said that it is false to say that there has been no meeting, as the group is required to serve WUC members service system changes, and this requirement is being met.

- Existing plans and rules shared of important included
 - 1997 Watershed Planning Act (encourage the development of comprehensive, long-range watershed planning through voluntary collaborative efforts at the watershed level.)
 - 2010 Water Management Rule

Tom Aumock (former Fire Chief, and currently fire consultant)

- There was some discussion about interties and an explanation of this and consolidations, as there have been several within the past.
- The Washington Surveying and Rating Bureau (WSRB) just completed a review of Jefferson County, and WSRB is a long-range look. The standards and specifications in the WSRB identify functional areas for us, and states that the last water system was Port Ludlow
- Initial adoption used a committee made up of specific water utility entities, and this is a first step.
- Dealing with the standards and specifications, and consistency is critical
- Many plans allow for less the 8-inch infrastructure, which needs to be reviewed since eight-inch lines going to six-inch lines would be problematic.
- Information needs to be provided for new owners
- Tom suggested looking at the composition of the WUC meeting members by ordinance, and reaching out to them.
- Identifying the history, and then look at each element, and see if it's valid for the next session, and then spearhead the meeting of the WUC members (outline).
- Distinction between voting members, and nonvoting members as we look at members
- Tom also shared that he is mostly involved with Chapter 4 standards, essentially expansion of the water system. Brent Butler
- Mark Horton developed this plan and lives in Cape George – it's possible that he could assist again.
- Tom recommended using the revised section 4, and some of the issues are already identified

Brent A. Butler

- Shared several updates, including plan development costs upwards of \$300K to \$400K.
- Funding approaches include: 1) develop a request for proposal ("RFP") to retain a consultant and pay for services from the General Fund, 2) establish a taxing district, 3) rely on the Chief Strategy Officer as the county lead responsible for the CWSP update to complete an in-house update that retains clerk hires to assist
- Cost does not appear to be related to the population size, and there was some discussion about the appropriateness of this, and if it's factual
- Shared a potential way to develop the Scope of Work
 - Identify the core group,
 - Do the RCW and WAC review, and
 - Determine where the old plan is out of WAC.
 - Prioritize the needs to update the plan
 - Use the existing plan, and send out a matrix with each section as the area where one could

Nikki

- Source water protection funding is only if there's no requirement for this to occur.
- Technical pieces, can help, but it cannot be used to meet the requirements of the WAC
- Source water funds watershed assessments, and identifying contaminant resources, sanitary security measures.
- Source water funds cannot assist with developing new wells
- DOH cannot help develop new or maintain existing well.

- The operation and maintenance is not part of what's permissible.
- DOH funds are largely EPA pass-through funding. If we had a need to look at WIRA 17, and how much water is available, DOH could help with this?
- For surface water, drawing up easements, and drawing up surveys, and ag outreach projects.

Pinky Mingo

- Asked if planning for infrastructure permissible (Nikki said she is unaware if the revolving fund can be used (AKA clean water revolving fund))
- Shared that
- Does the WAC spell out who needs to be on the WUC (In response, Joel Peterson read from statute stating that one representative of the county legislative authority, county planning agency, health agency, water purveyor with 50+ services, and others as non-voting members form those who need to be at the table)
- Environmental Public Health doesn't have capacity to assist with an update to the CWSP.

Joel Peterson

- CWSP has a required update every five years.
- 2008 was the last meeting.
- WAC 246.249. 350 (system operators, DOH, Fire Districts) = Public Water System Coordination Act

Phil Cecere

- Asked if some of the funding related to wildfire protection planning, e.g., putting together plans for fuel reduction, and other related issues can be funded by Source Water Funding (Nikki said yes, but that it cannot help build things such as water reservoirs), so there's some wildfire prep.

Scott Pollock

- Commented that the Coordinated Water System Plan process should be analogous to the usual Water System Plan process
- Indicated that he is not personally familiar with CWSPs.
- Shared that he and a colleague (Ben) were getting up to speed on this topic.
- Ben Majors is the newly assigned DOH planner for Jefferson County, and one the county would need to coordinate with;

Attachments

Attachment 1/May 25, 2023 meeting notes regarding the CWSP with Whatcom County

Attachment 2/May 5, 2023 meeting notes regarding the CWSP issues identified by PUD

Subject: Draft meeting notes: Coordinated Water System Plan
Date: 2023-05-25 11:25:53
[Download](#)
From: Brent Butler
To/Cc: Phil Cecere

Sue Sullivan (Pinky's counterpart) – Environmental Manager, Whatcom County; Gary Stoyka, Natural Resources Program Manager, Whatcom County; Phil Cecere, Brent Butler

Discussion:

Funding: Whatcom County Flood Control District (FCDs) – Whatcom's was established in the early 1990s; areas permissible for its use include: 1) Stormwater, 2) Flooding, 3) Coordinated Water System Plan - creation and updates - and Water-related Natural Resource Activities, e.g., protecting shellfish beds. King, Pierce have FCDs; Stormwater utility is a more common use of the Flood Control Districts

History:

Back in the early 2000s, DOH gave out grants, and there wasn't any funding since that time so between 2000 and 2015, there was no update. The significant update occurred in 2015 & 2016 – public works was the lead. It fell within a lot of watershed planning work and it was subsequently handed off to the public health department.

Sue is going to do a much smaller update than that what was done in 2015/16; she thought that the DOH set up funding for 150K so that local jurisdictions could update their CWSPs but after reaching out to persons, including among others Holly Meyers – director of the office of drinking water, couldn't find a funding source. Sue is therefore going to rely on foundational public health money to update their FCD. Their update is going to include receivership guidelines (when a water system goes bankrupt), and the state of the union (precarious state – not enough fees collected to address a failure; if something fails it's on the county, as the entity of last resort) Sue suggested we look at COMP PLAN funding because Whatcom's 2023 and 2014 update may also receive some funding through their Comp Plan update. They'll include the known water systems, and the update will incorporate a comprehensive list of changes identified as low-hanging fruit and that'll include an update of the Whatcom County code. Additionally, they wanted to add something in the plan about climate change (may be a statement).

For permits, they have water services employee sitting with their equivalent DCD; if water isn't available, environmental public health won't sign off.

Water Utility Coordinating Committee (WUC) – we may need to start from scratch. WAC 17.116 – must be made up of all water utilities with more than 50 hookups; Sue said that they used DOH records to determine who should be on the WUC. Whatcom had over 70 systems (DOH should have this on a website). Hydrant spacing is handled through our CWSP. Update should occur before the COMP Plan is updated/ may do it parallel. 700K received from the Department of Commerce for the update & is getting more to add the climate regulations to add it into the comp plan (CWSP update – folding it in).

Brent Butler

(he, him)

Director, Jefferson County Department of Community Development
621 Sheridan Street
Port Townsend, WA 98368
Phone 360-379-4493
bbutler@co.jefferson.wa.us

Subject: Coordinated Water System Plan meeting
Date: 2023-05-05 12:11:53
[Download](#)
From: Brent Butler
To/Cc: Phil Cecere [+](#)

Dear Phil,

Please review my notes, and add anything you deem necessary.

Topic: Coordinate Water System Plan – 1) purpose, 2) Interconnections, 3) Scope of Work and Financing, 4) Issue identification

Attendees: Kevin Streett <kstreett@jeffpud.org>; Hansen, Jeffrey <Jeff.Hansen@hdrinc.com>; Phil Cecere PCecere@co.jefferson.wa.us

Jeff Hansen, a water engineer with HDR met with county staff to discuss the interrelatedness between the CWSP and the State Building Code, and if there's an immediate need for an update. Jeff suggested that we meet with Andy Anderson, SW Dept of Health, to obtain further guidance if possible. We discuss what level of detail is supposed to be in the CWSP, and learned that some counties have removed details to an ordinance partly because it's easier to change the ordinance and opposed to convening the WUC. We also learned that the individual water utility providers should likely establish project specific guidance, and that the CWSP could establish minimum standards. Asked if minimum standard could be based on density, especially if we chose not to adopt the IFC standards as they are for more urbanized areas that might not reflect local needs. Wildland Urban Interface Code's Chapter 4 says that the local regulations control and since the CWSP establishes regulations for water purveyors it could also address the following

1. Interconnections,
2. Receivership (when a water purveyor is no longer viable or is bankrupt) Typically, the responsibilities falls back to the county posing risk management issues.

It appears that the convening committee was established by resolution but that the CWSP may never have been adopted so the legislative process was never completed.

- a. Scope of work / Financing – Jeff will provide us a scope of work used by Pierce County, which recently updated their CWSP. Some of the goals of an update would be to ensure that it is consistent with state and federal law, that it identifies what, e.g., standards, should live where, e.g., in an ordinance as opposed the CWSP; address the standard requirements so that the document reflects the State Building Code guidance; lays out the process for receivership related to a failing system acknowledging that the State DOH sets requirements, but that the County may be on the hook for any costs. The CWSP could help clarify what happens
 - b. Recognizing – where does CWSP has jurisdiction over group A water system. In a rural setting, CWSP – historically it was to establish service area boundaries, and avoid problems with competing water service areas.
3. WUC could establish other areas – long term regional water supply standards, policy recommendations regarding water quality - The CWSP doesn't confer regulatory or enforcement power. The CWSP or WUC is used as a venue to bring parties together. It could be something that says you could follow county code, so that we could go to the code to advance changes.

4. This existing CWSP document was put together before the municipal water law was established. Must be tuned up to acknowledge the CWSP

Brent Butler

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