



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
SOUTHWEST DRINKING WATER REGIONAL OPERATIONS  
111 Israel Road Southeast • PO Box 47823 • Olympia, Washington 98504-7823  
Tel: (360) 236-3030 • Fax: (360) 236-3029 • TDD/TTY 711

April 26, 2024

David McNally  
Town of Cathlamet  
375 2<sup>nd</sup> Street  
Cathlamet, Washington 98612

Subject: Town of Cathlamet Water System, ID #11850D, Wahkiakum County Water System Plan, ODW Project #23-0704

Dear David McNally:

Thank you for submitting the draft Water System Plan (WSP) for the Town of Cathlamet, received by the Office of Drinking Water (ODW) on June 14, 2023. The following comments must be addressed before ODW can approve the WSP.

#### GENERAL COMMENTS

1. Please ensure the plan is signed by the Professional Engineer(s).
2. Elochoman Valley Road is also referred to throughout the plan as St Hwy 407 (on the maps) and SR 407. While some instances use both names for clarity, others do not. Please consider providing consistency in these references.

#### CHAPTER 1--WATER SYSTEM DESCRIPTION

3. Pages 18-19/545, Figures 1-2 and 1-3. There are two service area labels that should be used for consistency with the definitions of the Municipal Water Law. These are "Service Area" and "Retail Service Area". The "service area" is the largest area and includes wholesale customers. It is used to establish the water rights place of use. The "retail service area" is the location where the water system is committing to meet the requirements of "duty to serve" as defined by WAC 246-290-106. For consistency, in Figure 1-2, the label should be "Retail Service Area" and the label in Figure 1-3 should be "Service Area, Water Rights Place of Use". Please revise.

More great information regarding service area designations is available here:  
[Municipal Water Suppliers: Service Areas in Planning Documents.](#)

4. Page 1-15, Backup Power. Please provide the status for the addition of the permanent emergency generator at the treatment plant that was under construction last year.
5. Page 1-20, Puget Island Water System Comprehensive Plan. Please note that Wahkiakum PUD has converted the Puget Island Water System Plan (WSP) to a Small Water System Management Program (SWSMP).
6. Page 1-21, GMA Related Plans, Policies, and Development Regulations. This section lists several GMA requirements. Please discuss the completion or implementation status of each of these.

7. Page 1-24 to 1-25, Duty to Serve. This section references the number of DOH-approved connections. However, plan approval will be based on the maximum number of ERUs the system can serve, with an 'unspecified' number of connections. The city must then ensure that connections are allocated within the allowed ERU limit. Please add this clarification to the text of this section.
8. Page 1-26, Record Keeping. Please include a summary of all record-keeping and retention policies being implemented.

## CHAPTER 2—BASIC PLANNING DATA

9. Page 2-9, Distribution System Leakage and Page 4-5, Distribution System Leakage Standard. Please see Authorized Consumption, page 43 of the Water Use Efficiency Guidebook for examples of water usage that can be tracked, estimated, and removed from DSL calculations.

Please also note that water loss resulting from leaks is not considered authorized consumption and must be included as a "real loss" in DSL calculations.

## CHAPTER 3—SYSTEM ANALYSIS

10. Page 3-7, Inorganic Source Water Quality, Table 3-4. Please clarify if the value for fluoride is 0.78 mg/L naturally occurring in the source water or the post-treatment value. Also please note that fluoride has both a primary and secondary MCL of 4.0 and 2.0 mg/L respectively.
11. Page 3-7, Finished Water Quality, Turbidity. Please include details on which Treatment Optimization Program goals are being met and specific actions with a timeline to work towards meeting the others.
12. Page 3-11, Monitoring Requirements and Analysis. This section references the Coliform Monitoring Plan in Appendix I. However, it does not appear to be included in the plan. Please provide.
13. Page 3-13, Monitoring Requirements and Analysis. There is a typo in 90<sup>th</sup> percentile lead level, which says ppd instead of ppm.
14. Page 3-13, Revised Lead and Copper Rule. Please discuss a plan to submit the lead service line inventory. We have guidance on our website (Lead Service Line Inventory Guidance) and please contact our office if you need assistance or have other questions.
15. Page 3-42, Summary of Deficiencies. The raw water intake capacity should be addressed with a long-term solution. This is on the CIP in Table 8-2, but not planned until 2029. We suggest that planning begin now. Our office can help with funding options; please contact us.
16. Page 3-44, Water Distribution System Deficiencies. We recommend implementing a schedule to replace a certain percentage of service meters every year, so that each meter is replaced according to the manufacturer's guidelines. For example, replacing 10 percent of meters each year would result in meter replacement every 10 years.
17. Page 3-47, Summary of Deficiencies. Table 3-28. The cost of replacement in Table 3-28 is much less than that listed in Table 8-2. Please clarify which is the more accurate estimate.

#### CHAPTER 4---WATER USE EFFICIENCY (WUE) PROGRAM

18. Page 4-1, General comment. The distribution leakage is high, but only four distribution main replacement projects are identified in the CIP. Please ensure the planned projects are adequate to bring DSL below 10 percent. We have funding options available for construction.
19. General comment. Both six- and ten-year time frames for your WUE goals are referenced throughout this chapter. Please ensure the time frame is consistently cited and matches what was presented to the public and adopted, if applicable.
20. Page 4-4, last paragraph. Please clarify which measures are being implemented in addition to assisting customers with possible leaks. This section references continuing to implement "all their current measures described in the preceding sections". Also, please indicate the time frame that will be followed to determine whether current measure(s) are enough to meet the demand-side goal.
21. Page 4-5, Implementation/Evaluation of Water Use Efficiency Measures. Please identify the seven customer classes referenced in this section and discuss how they each support the goal of reducing residential consumption as separate measures.
22. Page 4-8, Goal Setting and Performance Reporting. The public forum for presenting WUE goals must meet specific requirements. Please provide the following documentation for the WUE meeting noted on this page:
  - a. A copy of the public notice provided 2 weeks prior to the meeting indicating:
    - i. The meeting purpose (to present the WUE goals). If the governing body also adopted the goals at that meeting, the notice should indicate that, as well.
    - ii. The meeting date, time, and location;
    - iii. Where additional supporting information was made available to your audience.
  - b. A copy of the approved meeting minutes detailing any public comments received and how they were considered, as well as adoption of the goals by the governing body.

Note: If these items are not available for this past meeting, you may present your goals again when you present your final draft plan for adoption if the conditions noted above are met.

23. Page 4-8, Water Use Data Reporting. This page references the Conservation Planning Requirements, which have been replaced by the Water Use Efficiency Guidebook. Please update. (The plan notes this change on page 4-1.)
24. Please describe how consumers are educated about water use efficiency practices.

#### CHAPTER 5---WATERSHED CONTROL PROGRAM

25. Page 5-1, Watershed Description. Descriptive information provided in this section is from a 1985 USGS reference. Please assess whether this information is still accurate and provide any applicable updates.

26. Page 5-3, Inventory of Contaminants. Please provide a more detailed inventory of all potential sources of contamination located within the watershed that have significant potential to contaminate your source water quality. Identify site locations and owners/operators.
27. Page 5-4, Watershed Control Program. Please indicate which of the tasks noted in the first and third paragraphs have been completed and discuss plans and timelines for completion of the others.
28. Page 5-5 to 5-6, Watershed Control Actions. These pages list several “actions the Town will consider implementing to ensure the future protection of the Elochoman watershed”. These actions appear to be the same as those listed in the 2015 WSP. Please indicate which of these actions have been completed and discuss plans and timelines for the completion of the others.
29. Page 5-6, Emergency Response. There are two phone numbers provided for the 24-Hour Drinking Water Emergency Hotline. The first one, (877) 481-4901 is correct, but the second one, (800) 525-2536 is not. Please remove this second number.

#### **CHAPTER 6—OPERATION AND MAINTENANCE PROGRAM**

30. Page 6-2, Operator Certification. This section indicates that the system does not have a Cross Connection Control Specialist (CCS) or a Backflow Assembly Tester (BAT), but that the recently retired CCS will be on call until a new person is certified. Please clarify the following:
  - a. What is the status of the system’s CCS and BAT certification?
  - b. Page 6-15 indicates that Terry Vik is on call as the CCS until someone else is certified. Our records indicate that Terry Vik’s certification expired 03/27/2019. If this is incorrect, please provide documentation so we can update our records.
  - c. What CCC activities are currently being implemented?
31. Page 6-9, Emergency Response Program. Please elaborate on short- and long-term contingency plans for water outages.
32. Page 6-9, Emergency Response Program. Please evaluate the wildfire threat, both short-term response to the emergency and potential impacts on the watershed.
33. Page 6-14, Cross-Connection Control Program. This section indicates that Ordinance 550-12 is the legal document supporting the system’s CCC Program and page 1-24 seems to indicate that Ordinance 361 does so. Please clarify and add the applicable ordinance to the WSP.

(Please note that additional Cross-Connection Control Program comments are provided below in the Appendix E section.)

**CHAPTER 8—CAPITAL IMPROVEMENT PROGRAM AND  
CHAPTER 9—FINANCIAL PROGRAM**

34. Page 8-2, Source Improvements. Please discuss how the town intends to incorporate the proposed new well on Puget Island, including whether it is likely to be used as a primary or supplemental source for Puget Island, an emergency source for the town, or as part of a consolidation of the Puget Island and Town of Cathlamet water systems.

If the intent is to consolidate these two systems, please discuss the proposed management structure of the combined system.

35. Page 8-13, Analysis and Page 9-8, Conclusions and Recommendations. These sections indicate that current rates are insufficient to fund operations and planned capital improvements throughout the 10-year planning period while maintaining a positive ending cash balance. Please indicate if the town intends to incorporate any of the options noted to increase revenue.
36. Page 9-7, Financial Viability. The town's emergency reserve fund is described to be in Table 9-6. However, this table does not appear to be included in the plan. Please provide the budget details for this and any other reserve funds.

**APPENDICES**

**Appendix C, Water System Interlocal Agreement**  
(Intertie Agreement between the Town of Cathlamet and Wahkiakum PUD)

37. Page 263/545, Term. This agreement expires December 31, 2037. Please discuss the town's plans for renegotiating or extending the agreement.
38. Page 266/545, Performance and Impossibility. This section states that "...the Town shall not be liable for failure to deliver a sufficient supply of water to the District resulting from unforeseeable conditions beyond the Town's control..." Please discuss how available capacity is coordinated and communicated with Wahkiakum PUD.
39. Page 255-272. The agreement does not contain the required provisions noted below. Please address these if/when the agreement is next up for negotiation or renewal.
- a. Identification of the volume of water available for use, including any seasonal or other restrictions; and
  - b. Identification of how water use efficiency programs, data collection, water demand forecasting, and other operational matters will be coordinated.
  - c. Identification of alternative sources that will be utilized when the intertie agreement expires if the water is not being provided in perpetuity.
40. Page 270/545. First Addendum, Primary Alternate Line. This section references a New Primary Alternate Line identified in Revised Exhibit "A". This revised exhibit does not appear to be included in the plan. Please add it.

#### Appendix D, Water System Standards

41. Page 283, Water System Standards. Since these standards were last revised in November 1994, we recommend a thorough review since there are almost certainly other updates to best practices that I did not note in my review.
42. Page 308, Standard Drawing 6, Air Valve Assembly. The air inlet and discharge vents should be located outside the valve vault at least 18 inches above finished grade. Please see section 6.4.2 of the Water System Design Manual.
43. General Comment. Please include the standard for pipeline separation from non-potable pipelines.

#### Appendix E, Cross-Connection Control (CCC) Program

44. Page 310-321/545, Cross Connection Section of Cathlamet Municipal Code, Chapter 13.50. In addition to numbers 31 and 34 above, the following items are required for a complete CCC Program (WAC 246-290-490(3)) and do not seem to be included. Please discuss a timeline for adding these to your CCC Program.
  - a. Element 2 (iii):  
A schedule for periodic reevaluations of existing service connections to assess the degrees of hazard posed by consumers' premises. (We recommend conducting these assessments every 5 years.)
  - b. Element 5:  
Procedures to ensure that approved backflow preventers are inspected and/or tested (as applicable) as required.
    - i. Page 6-15 indicates that customers must ensure annual backflow assembly testing and must submit documentation of testing to the system.  
Please discuss the system's compliance strategy in cases where documentation of annual testing is not provided.
  - c. Element 6:  
A backflow prevention assembly testing quality control assurance program including, but not limited to, documentation of BAT certification and test kit calibration, test report contents, and time frames for submitting completed test reports.
  - d. Element 7:  
Procedures for responding to backflow incidents.

#### DEPARTMENT OF ECOLOGY

The Department of Ecology has issued a comment letter regarding this submittal. Please incorporate your response into your resubmittal.

*Our review of your WSP and design 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 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.*

David McNally  
April 26, 2024  
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## CLOSING

Please respond to all comments in this letter. To expedite the review of the revised WSP, please summarize your response to comments and where each response is located (for example, page numbers, appendices, and so on). **Please submit your response to these comments electronically to [swro.admin@doh.wa.gov](mailto:swro.admin@doh.wa.gov).**

Regulations establishing a schedule for fees for review of planning, engineering, and construction documents have been adopted (WAC 246-290-990). An invoice for \$2280 is enclosed. This fee covers the review of the initial submittal and one revised document.

Sincerely,



Meredith Jones, RS  
Regional Planner, Office of Drinking Water



Candida Granillo-Dodds, PE  
Regional Engineer, Office of Drinking Water

## Enclosures

cc: Sarah Clark, Town of Cathlamet  
Abbey McDonald, Gray & Osborne  
Emma Diffendal, Wahkiakum County Environmental Health  
David Hicks, Wahkiakum County Building and Planning  
Jamie Barron, Department of Ecology

STATE OF WASHINGTON  
Department of Health  
OFFICE OF DRINKING WATER  
Project And Plan Review

**INVOICE**

ACCOUNTS PAYABLE  
CATHLAMET WATER DEPT  
375 2ND ST  
CATHLAMET, WA 98612

WS ID: 11850  
Invoice No: 55535  
Invoice Date: 04/26/2024  
Due Date: 05/26/2024

WS NAME: CATHLAMET WATER DEPT

PROJECT AND PLAN REVIEW SUBMITAL#: 23-0704

DESCRIPTION	QTY	COST	AMOUNT
Project Report	1	x \$2280.00	\$2280.00
<b>Total Amount Due</b>			<b>\$2280.00</b>

**Comments: Water system plan (new and updated plans) 501 to 999 Services**

1. **Pay online** with a credit card, debit card, or electronic check (ACH) using the Environmental Health Payment System at <https://secureaccess.wa.gov/>.
2. For billing questions, please contact Southwest Drinking Water Regional Operations at (360) 236-3030 or via email SWRO.Admin@DOH.WA.GOV.
3. This invoice is issued in accordance with WAC 246-290-990(3)(c)(iii).
4. For persons with disabilities, this document is available on request in other formats. To submit a request, please call 711 Washington Relay Service.
5. If paying by check:

**Make checks payable to Department of Health, Federal ID #91-1444603.**

Please return the bottom portion of this invoice with your check.

Invoice Number: 55535  
Invoice Amount: \$2280.00  
Owner Number: 000929  
WS Name: CATHLAMET WATER DEPT

Invoice Date: 04/26/2024  
Invoice Due Date: 05/26/2024  
Region: SW  
WS ID: 11850

Reference: PROJECT AND PLAN REVIEW FEES

Please remit to:  
**ACCOUNTS RECEIVABLE  
DOH PROJECT AND PLAN REVIEW FEES  
PO BOX 1099  
OLYMPIA, WA 98507-1099**