WASHINGTON STATE DEPARTMENT OF HEALTH

2024 Capacity Development Program Annual Report

Washington State Department of HEALTH

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Note/Acknowledgements

The Safe Drinking Water Act requires states to report on their Capacity Development Program implementation annually. Information in this report addresses the U.S. Environmental Protection Agency's criteria for assessing state implementation of the Capacity Development Program.

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
OFFICE OF DRINKING WATER
P.O. Box 47822 | Olympia, WA 98504
Tel: (360) 236-3100 | Fax: (360) 236-2253 | *711 Washington Relay Service*

September 30, 2025

Stephanie Hung
Environmental Protection Agency Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Hung:

The Department of Health Office of Drinking Water respectfully submits this letter and accompanying Washington State 2024 Capacity Development Program Annual Report. This provides information on our capacity development program activities for new and existing public water systems.

This report highlights program improvements, progress, and program objectives during the past fiscal year. Challenges and successes are listed in detail with a focus on attention to include support through technical assistance and funding for disadvantaged communities, attention to cybersecurity in an ever-changing environment, and adaptation to address emerging contaminants across the state.

Additional strategies include program commitment to infrastructure funding options, workforce development, source water protection, and regulations for lead, copper, and PFAS. With new regulations comes outreach, education and operator support to continue to ensure systems have the technical, managerial, and financial resources required. We have substantially expanded contracted support for small and disadvantaged systems including direct support for engineering, planning, and project management. We continue to provide presentations, attend conferences and external organization meetings to keep our regulated community informed and in compliance.

We look forward to continuing to find improvements and efficiencies in our programs and processes. Our continued commitment is to support public water systems to maintain the equitable provision of safe and reliable drinking water for residents of Washington. If you have questions, please contact Mike Means, Water Quality, Policy, and Certification Manager mike.means@doh.wa.gov.

Sincerely,

Holly R. Myers

Director, Office of Drinking Water
Environmental Public Health
Washington State Department of Health

Enclosures

cc: Chris Affeldt, Groundwater and Drinking Water Section, EPA Region 10
Brian Nickel, Manager, Groundwater and Drinking Water Section, EPA Region 10

Introduction

This report uses the U.S. Environmental Protection Agency's (EPA) reporting criteria to describe the Department of Health (DOH) Office of Drinking Water's (ODW) capacity development program implementation for new and existing drinking water systems during July 1, 2024–June 30, 2025. This report highlights program improvements, progress, and program objectives during the past state fiscal year reporting period. Some program data, however, is summarized for the 2024 calendar year due to challenges tabulating data on a fiscal year schedule.

We regulate public water systems under state law and a formal primacy agreement with EPA. This agreement delegates authority to Washington State to implement the Safe Drinking Water Act (SDWA). In 1974, the SDWA established national drinking water standards aimed at preventing waterborne illness. In 1996, SDWA amendments required each state to develop and carry out a capacity development strategy to:

1. Ensure all newly created systems meet technical, managerial, and financial (TMF) capacity.
2. Establish a long-term strategy to assist existing systems in acquiring and maintaining TMF capacity.
3. Ensure all water systems funded through the State Revolving Fund demonstrate TMF capacity.

We integrate capacity development into our programs and our contracts with local, state, and federal partners. The information we gather and relationships we build through our programs help us assess the overall state of the drinking water industry, the health of the communities they serve, and specific capacity challenges each water system faces. This allows us to focus our efforts on water system needs and assist them in pursuing their community's goals.

Washington State's capacity development strategy and compliance and enforcement strategy prioritize providing technical assistance (TA) to systems with violations. This report summarizes the year's activities implementing our strategy. We outline new and existing system capacity development strategies developed, adopted, and implemented to ensure newly proposed water systems and existing water systems have the TMF capacity to achieve and maintain compliance with federal regulations.

We also take strategic actions to focus funding and efforts based upon the needs of utilities and available funding. In 2024, we worked to establish TA contracts for direct utility support with engineering, planning, and consolidations to support utility needs to leverage federal funding under the Bipartisan Infrastructure Law.

This report uses acronyms listed in Appendix A.

EPA Reporting Criteria

New Systems Program Annual Reporting Criteria

1. **Has the State's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year? If so, please explain and identify how this has affected or impacted the implementation of the New Systems Program (additional documentation, such as an Attorney General (AG) statement or a statement from a delegated department attorney, may be required.) If not, no additional information on legal authority is necessary.**

   No.

2. **Have there been any modifications to the State's control points? If SO, describe the modifications and any impacts these modifications have had on implementation of the New Systems program. If not, no additional information on control points is necessary.**

   There were no modifications to the state's control points. Washington State addresses new system capacity in two ways.

   a. New water systems must demonstrate capacity through a water system planning review and approval process. The principal goal of water system planning is to identify current and future demands, apply available resources to provide high quality service at the lowest cost, and protect the community's health. Planning is a cornerstone of water system capacity. Water systems with strong TMF capacity are well-positioned to provide efficient, high-quality service now and in the future.
   b. New water systems must have engineering reports and construction documents reviewed and approved by our assigned engineering staff prior to construction. Our review focuses on risk reduction and public health protection. Reviewing engineering documents ensures compliance with regulatory standards. We strive to share our collective experience to promote construction and operation of appropriate, safe, reliable, and sustainable public water supply systems. Our goal is to help the design engineer and water system owner build a project that is safe and reliable now and into the future. We do this by asking questions, exploring risk versus available resources in the design phase, and helping water system owners and design engineers identify potential consequences of operational failure. Potential consequences can include contamination leading to illness, impacts of health advisories, permit restriction, or legal liability to customers.

   During our work, ODW staff may identify an existing water system that meets the threshold for Group A but has not previously been regulated under our Group A public water system regulations. This typically occurs when Group B systems add additional unapproved connections to their water system, or the population served by the Group B systems increases to serve 25 or more people a day for more than 60 days a year due to

changes of use or in the number of people per household. These newly identified systems are more likely to be out of compliance and result in a score of 11 or more on EPA's Enforcement Targeting Tool (ETT). We support these systems in multiple ways.

- State regulations require all new water systems with ten or more residential connections to meet all design and approval requirements under our Group A regulations, including the water system planning and design requirements. This helps ensure TMF capacity if the system serves 25 or more people a day in the future. The average person per household in Washington State is 2.61; it is assumed that water systems with ten more connections will routinely serve 25 people a day at some future date.
- Sanitary surveys are scheduled for newly identified existing Group A water systems in the next survey year to identify any TMF capacity deficiencies and to provide any TA needed. At this time, the office may issue a directive detailing information that must be submitted or completed to obtain compliance with our regulations.
- The newly identified existing water system's operating permit is blue (see Annual Operating Permits below), indicating that the water system has more connections than the system was approved for or that we have not verified the capacity of the water systems.
- The newly identified system may be required, at our discretion, to provide at a minimum for approval:
  - A water system planning document.
  - As-builts or recording drawings.
  - Water quality analysis.

3. **List new systems (PWSID and Name) in the State within the past three years and indicate whether those systems have been on any of the annual Significant Non-Compliers (SNC) lists (as generated annually by EPA 's Office of Enforcement and Compliance Assurance).**

   We continue to use EPA's ETT Tracker, which shows ETT trends over consecutive quarters. We appreciate the tool's ability to show trends and filter in various ways, including "by new system." We used the ETT Tracker to identify if new systems have compliance issues and determine whether they appeared as priority systems on any previous ETT lists.

   During the last three calendar years of 2022-2024, we added 102 new systems to the state's inventory. These systems included 13 community water systems, 8 nontransient noncommunity (NTNC) water systems, and 81 transient noncommunity (TNC) water systems. There were no community or NTNC systems that scored 11 or more on the ETT list (See Table 1 below).

Table 1: New Systems

	Community Water Systems	Nontransient Noncommunity Systems	Transient Noncommunity Systems	Total
New in Calendar Year 2024	13	8	81	102
On ETT List with Score ≥ 11	0	0	3	3

List of New Systems

New Community Water Systems in compliance or with ETT scores less than 11.

1. WA53AC551 Allyn Carey
2. WA5332074 Badger Canyon Ranchettes #2
3. WA53AE123 Clouse Water System
4. WA53AC131 Desert Hills
5. WA53AB325 Game Farm Estates
6. WA53AE050 Grandview Condominiums
7. WA53AE120 OPR H2A
8. WA53AD362 Palomino Fields
9. WA53AD861 Tulip Meadows
10. WA5300615 West Deer Lake #1
11. WA53AD938 Naches RV Resort
12. WA53AB326 Mountain Ridge
13. WA53AB914 Turf Trails Domestic Water System

New TNC Water Systems with ETT scores greater than or equal to 11.

1. WA5325621 Big Toe Salvage
   The system has had some issues with their monitoring requirements when transitioning from a Group B to a Group A public water system in 2022. The system is currently under formal enforcement for failure to monitor for nitrate.
2. WA53AD166 Dancing Fish Farm
   The system has struggled to meet their coliform monitoring and operator certification requirements.
3. WA52AE114 Sun Harbor SW
   Shortly after activation, the system began having nitrate MCL exceedances. The system is currently under formal enforcement to mitigate the high nitrate levels.

New TNC Water Systems in compliance or with ETT scores less than 11.

1. WA53AD810 Sea Breeze
2. WA53AE316 Ferry County Fairgrounds
3. WA53AE028 Missing Corner
4. WA53AE292 Lakebay Community Church
5. WA53AD367 Cascade View Rodger Scott Water

6. WA53AE158 Cherry Harvest Labor Camp
7. WA53AD356 Liebert Property
8. WA53AE112 Carr Group
9. WA53AB836 Cameo Heights
10. WA53AA648 Wildberry Water System
11. WA53AA893 San Juan Vineyards Water System
12. WA53AB040 Premium Quality Hay & Feed
13. WA53AB467 The Porchlight
14. WA53AC142 Pasayten Peak
15. WA53AD159 Rustic Ridge
16. WA53AD618 Orondo Cider Works
17. WA53AD793 Stewarts Arena
18. WA53AD826 Unit 60B
19. WA53AD903 Edgewater Rocky Pond
20. WA53AD912 Cabin Creek Lodge
21. WA53AD964 Zirkle – Wildcat 1 Ranch
22. WA53AD965 Monson Stardust H2A Housing
23. WA53AD972 Aviator North
24. WA53AD973 Castle Rock Travel Center
25. WA53AD979 Sand Hollow 1 H2A
26. WA53AD986 Borton – Mesa Rock Ranch
27. WA53AE009 Zirkle – Wildcat 2 Ranch
28. WA53AE014 Benton Snipes
29. WA53AE039 Zirkle – Husky #3
30. WA53AE052 K2 Ranches
31. WA53AE055 Boast East Farmworker Housing
32. WA53AE058 Beddoe Farmworker Housing
33. WA53AE059 Grant Rd 25
34. WA53AE066 Grant K East
35. WA53AE069 Dollar General
36. WA53AE074 Buckey Lane FWH
37. WA53AE084 Riverview #3
38. WA53AE085 Rexius Farms Housing U104 B86
39. WA53AE086 Double M Mustang
40. WA53AE087 Boast West Farmworker Housing
41. WA53AE088 Randy Allred Orchards
42. WA53AE102 Frenchman Hills Dodson
43. WA53AE105 Frog Ranch Farmworker Housing
44. WA53AE127 Schad Holdings
45. WA53AE128 Borton – Occidental Camp I
46. WA53AE129 Borton – Occidental Camp II
47. WA53AE131 Halverstick Temp Farmworker Housing

48. WA53AE137 Hi-Point 2
49. WA53AE139 Borton - Tieton Jones II Camp
50. WA53AE140 Borton – Burbank Heights Jubilee #1
51. WA53AE149 Deception Pass Golf Center
52. WA53AE151 Valley Roz 8 Farmworker Housing
53. WA53AE155 Chiropractic Health Center
54. WA53AE162 A&B Farmworker Housing
55. WA53AE167 May Nursery TWH
56. WA53AE171 Willow Drive Nursery – RS Storage
57. WA53AE187 Meany Lodge
58. WA53AE188 Ranch 19 Sunnyside
59. WA53AE192 Paradise Orchards Quincy
60. WA53AE199 Park Addition Water Association
61. WA53AE204 Transition Bicycle Company
62. WA53AE206 Finch Ranch FWH
63. WA53AE216 Tahuya Adventure Resort
64. WA53AE219 Dodson Road RV Park
65. WA53AE223 DeBoer H2A Housing
66. WA53AE248 VBC
67. WA53AE265 AC Management FWH
68. WA53AE278 Desert Sands II FWH
69. WA53AE301 Tyee Marina
70. WA53AE315 K & G Land Company
71. WA53SP108 WSDP Seven Mile Riverside State Prk
72. WA5302029 Ryans House For Youth
73. WA5304312 Huntley Lodge LLC
74. WA5305270 Key Peninsula Community Club
75. WA5305403 Lakeview Heights HOA
76. WA5305794 Hedges Cellars
77. WA5314933 Copper Creek Inc
78. WA5359574 Barney-N-Bernies W.S.

New NTNC Systems in compliance or with ETT scores less than 11.

1. WA53AD699 Columbia Pulp I
2. WA53AE124 Knife River Public Water Supply
3. WA5306230 Lewis County Shop/Ethel
4. WA53AE119 Price Cold Storage 2
5. WA53AE047 PSE Whitehorn
6. WA5326461 Cedar Grove Composting Water System
7. WA53AD538 San Juan County PW—Beaverton
8. WA5325241 165th Ave Water System

Existing System Strategy

1. **In reference to the State's approved existing systems strategy, which programs, tools, and/or activities were used, and how did each assist existing PWS in acquiring and maintaining technical, managerial, and financial (TMF) capacity? Discuss the target audience these activities have been directed towards.**

   We continue to implement our EPA-approved capacity development strategy, *Washington's Drinking Water Strategy* 331-703 (PDF). In 2025, we continue to support the 4,152 federally regulated public water systems in Washington.

   We implement our capacity development program using a variety of resources and tools including, but not limited to, department capacity, development activities, and third-party technical assistance. Table 2 (next page) lists the capacity development activities and how each relates to the TMF capacity they can address. We will further discuss and describe how these activities were used to assist water systems in acquiring and maintaining TMF capacity over the last year.

Table 2: Capacity Development Activities

Activity	How This Relates to Capacity	Type of Capacity Assessed or Developed		
		T	M	F
Sanitary Surveys	Department staff members conduct sanitary surveys to assess the condition of facilities, operations, and general management. The department also contracts with third parties to conduct surveys.	X	X	X
Operator Certification	Department staff members administer a regulatory program for the certification of water system operators.	X	X	
Construction Document Review	Department staff members review and approve construction documents for new facilities and treatment to ensure compliance with drinking water regulations and design standards.	X	X	
Water System Plan (WSP) Review	Department staff members review and approve WSPs to assess major components of capacity.	X	X	X
Small Water System Management Program (SWSMP) Review	Department staff members review, approve, and document completion of SWSMPs to assess major components of capacity.	X	X	X
Satellite Management Agency (SMA) Plan Reviews	Department staff members review, approve, and monitor SMA plans to assess specific regulatory requirements in order to receive and maintain approval as an SMA.	X	X	X
Data Input and Management	Department staff members measure capacity program performance by entering, storing, and managing water system data.	X	X	X
Communications and Outreach	Department staff members use a variety of strategies to educate the drinking water community on regulations and water system requirements including capacity.	X	X	X
Technical Assistance	Department staff members and contracted TA entities provide TA to water systems and the public daily through calls, virtual meetings, on site visits, training, and electronic correspondence.	X	X	X
Enforcement/ Compliance	Department staff members apply enforcement in a prioritized and strategic manner to ensure water systems comply with state and federal drinking water regulations.	X	X	X
Performance Reporting	Department staff members generate performance reports for reporting to the governor and EPA.	X	X	X
Set-Aside Project Development	Department staff members continually develop set-aside funded projects and contracts aimed at improving capacity development in identified water systems.	X	X	X
State Revolving Fund (DWSRF) Loan Administration	Department staff members administer the DWSRF Loan Program to improve the water infrastructure of the state and enhance the technical, managerial and fiscal capacity of water systems.	X	X	X
Source Water Protection (SWP) Grant Program	Department staff administers the SWP grant program to assist water systems in improving knowledge of their source water hydrology, identifies ways to best protect source water and implement non-build solutions, and how to address potential/existing threats or contaminants.	X	X	X
Water Quality Monitoring Oversight and Assistance	Department staff members monitor the system water quality monitoring efforts and help complete sampling.	X	X	
Training	Department staff members and contracted TA entities provide training in drinking water regulations and programs.	X	X	X

Comprehensive Water System Planning

Washington State requires all Group A public water systems to plan. The planning requirements meet the technical, managerial, and financial (TMF) goals for water system success.

Washington State has a well-established planning approach that we first implemented in the late 1990s. At that time, we established two basic planning levels. A Small Water System Management Program (SWSMP) for small community systems and noncommunity systems. We use a Water System Plan (WSP) for large systems (over 1,000 connections), new community water systems, and expanding community water systems. In the early 2000s we also added flexibility by developing an approach to tailor the scope of a plan submittal to fit the needs of the water system. We refer to this as "Appropriate Level of Planning."

The principal goal of water system planning is to identify current demands and future needs and apply available resources most efficiently to provide high quality service at the lowest cost while protecting the community's health. Planning is a cornerstone of water system capacity. Water systems with strong TMF capacity are well positioned to provide efficient, high-quality service now and into the future.

Water System Plan (WAC 246-290-100).

The WSP is a comprehensive and detailed plan that is a continuous requirement for all large group A community water systems with over 1,000 connections. They must be kept current and can be approved for up to ten years. They also must be stamped by a professional engineer.

There are situations when a WSP is required for systems with less than 1,000 connections. They are required for new community water systems of any size, expanding water system or systems, and sometimes for compliance purposes for troubled systems.

Small Water System Management Program (WAC 246-290-105).

All other Group A systems, not required to plan under WAC 246-290-100, are required to maintain a SWSMP. New NTNC water systems and water systems interested in being eligible for DWSRF construction loans, that are not otherwise required to complete a WSP, must submit their SWSMPs to us for review and approval.

WSPs may be approved for up to ten years, based on provided information, and approved SWSMPs are not provided with an expiration date, rather, they must be maintained and updated over time.

We developed the *Water System Planning Guidebook* 331-068 (PDF) for WSPs and two SWSMP guidebooks (331-134 for community systems, and 331-474 for noncommunity systems). The guides help water system governing bodies, managers, and operators navigate the requirements and build a robust planning document appropriate for their water system. These guidebooks detail key TMF elements important to complete water system planning documents. Our planners work with water systems to apply an appropriate level of planning that meets each system's needs. The appropriate level of planning expectations is established at a preplanning

conference, held between our county-assigned planners and engineers, water systems, and contract engineers before work on the planning document begins.

We revised the *Water System Planning Guidebook* to align with 2023 state legislation. RCW 43.20.310 requires that Group A community public water systems with 1,000 or more connections include a climate resilience element in their WSPs. It also requires systems to assess the risk of extreme weather events, assess critical assets, and complete cost benefit analysis of the system's risk reduction strategies. Our office received support from the University of Washington's Climate Impacts Group to develop tools for systems to meet the new law. The new requirements strengthen each system's long-term capacity to prepare for and respond to emergencies caused by extreme weather events.

Our planners provide TA by phone, email, in-person and virtual meetings, and at conferences. Planners lead and facilitate meetings on a wide variety of topics, including but not limited to, asset management, budgeting, funding, governance, rates, disaster resiliency and preparedness, source water protection, regional collaboration and consolidation, receivership, and water use efficiency. Our TA contracts with Rural Community Assistance Corporation (RCAC) and Department of Commerce Small Communities Initiative (SCI) provide support for water systems in need of additional assistance.

Asset management is a core foundation of ensuring long-term capacity for public water systems in the water system planning process. Our new strategy clarifies and expands on how asset management pertains to our planning process. We incorporated asset management concepts into all our planning guidance documents. In addition, we created a training program with RCAC to teach water systems how to incorporate asset management into their current operations and planning programs.

We look at WSP documents as a foundation, where the water system takes a comprehensive look at its needs and statutory requirements and charts a plan of action for the plan approval period and the twenty-year planning landscape. Elements of these plans are reviewed every three to five years during routine sanitary surveys to ensure water systems are continually planning for the future. Water systems must have a current and approved WSP or SWSMP to apply for DWSRF construction loans. These plans also ensure water systems work to build capacity according to the expectations of the 1996 amendments to the federal SDWA.

Operator Certification

Aging infrastructure, increased water system demands, declining aquifers, workforce challenges, advancing technologies, and inadequate funding make the job of the certified operator more challenging and important than ever. The Operator Certification and Training (OC&T) Section leads our office to:

- Receive, process, and assist candidates with waterworks certification exam applications.
- Track, assist, and enforce annual certification renewal and tri-annual continuing education requirements.

- Receive, process, assist, and provide practical exams for Backflow Assembly Tester candidates.
- Review training for relevancy toward operator continuing education requirements.
- Evaluate, provide, track, and enforce temporary certifications.
- Identify, assist, and enforce water system operator requirements.
- Work with data management staff to ensure certified operator information remains relevant and easily accessible.
- Provide TA on water system operational issues.
- Receive, investigate, and prosecute complaints against operators.
- Work with our external partners through our Operator Certification Advisory Committee and Training and Technical Assistance Providers Group.
- Provide innovation in workforce development, succession planning, inter- and intra-agency coordination, rule and policy revision, and maintain a national perspective.

Workforce development continues to be one of our greatest issues now that more operators are retiring or leaving the business; 1,472 certified operators have failed to renew their certifications in the last four years.

Please see the Waterworks Operator Certification Program Annual Report to EPA for more information. Contact Bill Bernier, Operator Certification and Compliance Manager, at 360-236-3562 or william.bernier@doh.wa.gov if you have any questions.

Sanitary Surveys (Inspections)

The purpose of the sanitary survey is to assess a water system's facilities, operations and maintenance, and discuss ideas to help ensure the drinking water system will continue to provide safe and reliable drinking water for years to come. ODW county-assigned engineers and staff survey larger water systems and systems with treatment to reduce a primary contaminant. Local health jurisdiction (LHJ) staff and third-party surveyors (TPS) survey the state's numerous small public water systems. LHJ staff and TPSs conduct more than half of the hundreds of (and sometimes more than 1,000) sanitary surveys performed each year. Without our local health partners, we could not successfully meet our responsibilities to complete effective sanitary surveys within mandated timeframes. Training our local staff and supporting them with contracts to conduct surveys helps ensure local capacity to respond to drinking water emergencies.

As shown in Table 3 (next page), we completed 799 sanitary surveys in 2024 with the support of our partners. We continue to refine our internal processes and support our external partners as we work together toward the target of completing all scheduled sanitary surveys each year.

When we find deficiencies or problems, we explain how to correct them. We classify findings from a sanitary survey in accordance with our *Sanitary Survey Field Guide* 331-486 (PDF).

Table 3: Sanitary Surveys Completed in 2024

Surveyor	Complete	Totals
ERO DOH Surveyors	157	168
ERO LHJ/3rd Party Surveyors	105	105
NWRO DOH Surveyors	127	137
NWRO LHJ/3rd Party Surveyors	121	122
SWRO DOH Surveyors	105	110
SWRO LHJ/3rd Party Surveyors	184	188
Totals	**799**	**837**

- **Significant Deficiency** includes, but is not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage, or distribution system that the state determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers (40 CFR 141.403(a)(4)). If left unaddressed, a significant deficiency directly creates a significant public health risk.
- **Significant Finding** includes a lack of access or information, which interferes with the surveyor's assessment into whether a Significant Deficiency actually exists; or a defect or problem, which, if left unaddressed, indirectly creates a significant risk to the physical safety, security, or reliability of the public drinking water supply.
- **Referrals** is a sanitary survey finding that can be addressed by tapping into the expertise of a specific program area (such as the ODW Surface Water Program for potential GWI).

We set compliance deadlines and follow-up to make sure systems address both significant deficiencies and significant findings. The sanitary surveyor may also refer water systems to other programs with technical experience. Our staff may use referrals when identifying sanitary survey issues that require additional follow-up, training, or technical support from us. In 2024, deficiencies and findings were reduced across the state and referrals for TA increased. See Table 4 for sanitary survey finding classifications during the year.

Table 4: 2024 Sanitary Survey Findings

Finding Classifications	Totals
Significant Deficiencies	399
Significant Findings	317
Referrals	63
Totals	779

In 2024, our Sanitary Survey Team prepared and organized a two-day training event in Ellensburg at Central Washington University. Attendance included:

- Sixty-eight LHJ Partners
- Nine Technical Assistant providers.

- Thirty-eight ODW staff
- Total attendance for both days—115.

CEUs were granted to all Operators and Registered Sanitarians in attendance. After the initial opening presentations, attendees were split into advanced and intermediate training tracks. For day two, all attendees participated in the same training. Broad topics were covered from the step-by-step process of a sanitary survey to source monitoring, cross-connection control, chlorine residual testing, and much more. Training included lectures, hands on, such as chlorine residual testing and tactile examples of wellheads and backflow assemblies, as well as collaborative, sharing tips, tricks, and lessons learned from the field.

Engineering Submittal Review

Water systems must submit project reports and construction documents for review and approval prior to installation or construction of any new water system, water system extension, or improvement. Washington State has detailed design guidelines and expectations to ensure water systems projects are protective of public health and provide reliability over the long term. Our primary publication for design is our *Water System Design Manual* 331-123 (PDF). We have developed and refined it over many years to provide proven and reliable design methodology. We also expect water systems to follow industry standards, such as AWWA Standards.

In addition to requiring water systems to provide quality designs for infrastructure, we have invested in a team of engineers that are trained to provide professional-level design review. Our reviews focus on risk-reduction, public health protection, appropriateness of design, and reliability. In reviewing engineering documents, we intend to ensure compliance with regulatory standards. We also strive to share our collective experience to promote construction and operation of appropriate, safe, reliable, and sustainable public water supply systems. Our ultimate goal is to help the design engineer and water system owner build a project that is safe and reliable now and into the future. We do this by asking questions, exploring risk versus available resources in the design phase, and identifying potential consequences of operational failure.

Engineers also are critical partners for reviewing water system planning and approval of water system capacity. They do co-reviews with our planners for each water system plan submittal. This helps ensure a water system is adequately sized, appropriately planning for future needs. In particular, it supports ensuring water systems have sufficient technical capacity.

In 2024 our engineering team included seventeen regional engineers, two specialty engineers in our technical services group, one DWSRF engineer, and three engineering managers. The level of experience ranged from one to thirty years and included engineers-in-training (EITs) and licensed professional engineers.

Table 5: Engineering Submittals (7/1/2024 to 6/30/2025)

Submittal Type	Number Received
Booster Station	13
Capacity Analysis	9
Distribution Mains	22
Group B	8
New System	19
Other	36
Reservoir/Storage	29
Source	40
Treatment	52
Unfiltered Surface Water Report	3
Totals	**231**

Source Water Protection Program

We had a staffing gap between June-October 2024. We restored our Source Water Protection (SWP) staffing to its previous level of service with the addition of a new SWP Program Manager in November. With full staffing, we are growing the program and outreach efforts to outside groups significantly and adding value around SWP.

We held an SWP workshop in Pacific County during April of 2024. The workshop was attended by multiple, local surface water systems and was supported by EPA, Cadmus, and various state agencies as well as non-profits, and a local city that had purchased its watershed, serving as a model for water systems who hoped to do the same. The workshop helped connect water systems to agencies or non-profits that could build local SWP capacity.

We maintained and revised the Source Water Assessment Program (SWAP) online mapping tool to better focus on SWP data. SWAP is an important part of Washington's approach to raising awareness in agencies and the public about SWP. We converted our web tool to an ArcGIS online platform and continue to explore innovations in spatial tools to make data readily available. The SWAP web tool sees over 600 unique visits per month, indicating increased traffic over last year as we continue to promote the tool and refer to it.

We initiated several grant projects in 2024, including:

- Clark County Public Health for water quality data collection related to PFAS detections to encourage well decommissioning and connection to public water supply. We are developing Phase 2 of this work to expand the project area to more water systems.
- Washington State Department of Ecology to characterize risks to groundwater related to abandoned domestic wells in Lower Yakima Valley Groundwater Management Area to encourage decommissioning. We are developing Phase 2 of this work to focus on funding for decommissioning activities.

- City of Stevenson to develop a comprehensive assessment of water quality and quantity and to evaluate potential to convert from surface water to groundwater source.
- North Perry Avenue Water District to install security measures at three well sites.
- Sravasti Abbey Corporation to characterize groundwater resources and perform a source susceptibility analysis to prepare for decommissioning.
- Lewis County Public Works to assess potential aquatic and riparian restoration opportunities in the Salmon Creek watershed to improve water quality of downstream surface water intakes.
- Kamilche Point Community Club for the purchase and installation of pressure transducers to monitor groundwater levels and provide data to inform capacity and user conservation needs in low precipitation months.

We collaborated in providing, or directly provided, TA to numerous purveyors and agencies on diverse topics such as:

- Potential use of in situ decomposition in case of avian flu spread resulting in marine mammal mass casualties.
- Site-specific sanitary control area consultation.
- Transferring a large plat outside of the urban growth boundary from its current sanitary waste handling to sewer extension from a nearby city (state growth management law issue).
- City-level critical aquifer recharge area mapping and comments on development proposals.
- Large industrial fire that, due to its circumstances, was left to burn itself out.
- City experiencing source-specific PFAS contamination.
- Oceanfront city experiencing sea level rise that threatens its utilities assets, including a drinking water reservoir.
- Technical review committee for one of the state's largest cities relating to critical aquifer recharge area regulatory approach and source water protecting (reconciling zoning and utilities interests); also fielded related legislative inquiry.

We continue to encourage local governments and individual purveyors to upgrade their wellhead protection areas from the calculated fixed radius mathematical approach to modeling that considers groundwater flow in an area and better identifies protection efforts. Public water system capacity is a limitation to progress on this project, and we are advocating for regional or county-level modeling projects.

Water Quality Monitoring Oversight and Assistance

Our Water Quality and Data Management staff send reminders to systems that have not met monitoring or reporting requirements prior to the compliance date for consumer confidence reports, annual and triennial lead and copper monitoring, and annual nitrate monitoring. In 2024, we sent these reminders to all purveyors of the water system.

We provide a Water Quality Monitoring Schedule (WQMS) for all community and NTNC water systems. The WQMS is available online for water systems and includes when the last sample was collected and the next sample due date for each water quality parameter or suite of chemicals.

ODW water quality staff provide individual TA for water systems that have MCL violations, treatment technique violations, treatment technique triggers, and action level exceedances. We work with each water system to develop corrective action plans to determine milestones to address these violations. Systems needing additional support and funding can be referred to third-party TA providers to meet capacity development needs.

We track, store, and share public water system data with systems and the public on our Drinking Water System Data webpage. We provide customers with information about their water system, including water quality history, operating permit, and compliance status.

In May 2023, we kicked off the transition to the Safe Drinking Water Information System (SDWIS) database through contracted services through EPA implementation assistance. Over the last year we focused on data mapping for the transition. As of June 30, 2025, GEC completed 74 percent of the data mapping and 12 percent of the data transformation activities, migration file creation, and migration to the test version of SDWIS. We placed the project on hold in November of 2024 while we worked to secure a direct contract to complete the transition. The goal is to have long-term sustainable data management and tools for supporting public water systems and their customers, as well as reporting information to EPA.

Communications and Outreach

Our main ODW website, together with annual consumer confidence reports, keep customers informed about the overall performance of their water system. We continue to offer over 400 publications to provide TA and information to water systems and their customers. Publications are reviewed by staff annually to ensure they are up-to-date, still relevant, and provide accurate information. ODW's 2023–2025 operational plan includes a goal to improve language access of our resources for non-English speaking residents. We continued to focus on translating our public notifications and documents for the public into the top five languages spoken in Washington.

Our publications provide a range of TA to support water system capacity development. Our publications database includes fact sheets on sampling guidance, templates to develop sampling plans, cross-connection control program templates, draft public notifications, and tech tips on how to correct deficiencies identified in a sanitary survey. Between July 1, 2024, and June 30, 2025, we developed 22 new publications and updated or revised 31 publications. Table 5 lists some of the new or revised publications and the TMF capacity they address.

We continued to improve our newsletter to water system purveyors, *ODW Now*, which provides information ranging from new regulations to system operations. We increased details in articles of the downloadable newsletter. We publish *ODW Now* electronically bimonthly. Historical and recent copies can be downloaded from our newsletter webpage.

We continue to hold quarterly virtual Drinking Water Advisory Group (DWAG) meetings. With virtual access we have attendees from around the state. We provide updates on our office, legislative items, available funding and loan cycles, PFAS contaminants, the new Memorandum of Understanding with Ecology, and the Water Use Efficiency program audit. We also use these meetings to have discussions on different TMF needs and ask for water system feedback on proposed new regulations and policies to identify additional communications and outreach needs to support water systems to meet these new requirements. Meeting materials and notes are posted to the DWAG meeting webpage.

Similarly to DWAG, staff attend regional water utility coordination meetings around the state, such as the Clark County Water Utility Coordinating Council, Thurston County Purveyors meeting, the Regional Water Cooperative of Pierce County, and others.

Table 5: Publications

Publication Title	Publication Summary	Type of Capacity Development		
		T	M	F
Water System Plan Climate Reliance Element Workbook 331-778	The guidance document focuses on general approaches, information, and resources water systems may find helpful as they complete their Water System Plan (WSP).	X		
Emerging Contaminants in Small and Disadvantage Communities (EC-SDC) Grant Program 331-765	Two-page overview of the EC-SDC program	X		X
Preparing a Coliform Monitoring Plan for Wholesale or Consecutive Systems 331-475	This guidance document provides guidance to wholesale and consecutive systems on preparing their coliform monitoring plan and compliance with the ground water rule.	X		
Reminder to Surface Water Systems: Adjust Operations for Cold Weather 331-649	Two-page fact sheet to provide guidance on seasonal adjustments to treatment process when temperatures drop.	X		
Water Main Break Response Protocol For Unchlorinated Systems 331-755	Steps specific for unchlorinated water systems. This guideline closely follows the steps outlined for chlorinated systems with increased emphasis on post-repair microbiological testing using two methods, coliform and heterotrophic plate count.	X	X	
Sampling Required After Action Level Exceedances 331-387	Guidance document and form to complete required water quality parameter monitoring after a lead or copper action level exceedance.	X	X	

Security and Emergency Response Program

ODW works with water systems and others to plan, prevent, and prepare to respond to security breaches and emergencies. We are the lead agency for drinking water, Emergency Support Function (ESF 3) for several statewide planning groups such as the State Catastrophic Incident Planning Team (SCIPT), State Hazard Mitigation Work Group, and State Cybersecurity Advisory

Committee to coordinate multi-jurisdictional, regional, and/or statewide response to various emergencies (natural hazards, accidents, and malevolent acts).

We help water systems assess, respond, and return to normal operations after all types of emergencies from more routine occurrences like water main breaks to large-scale events like flooding, wildfires, extreme weather events, and drought. In 2023-2024, we provided response and support with:

- TA to thirteen water systems about emergency response plan development.
- Four water systems with alternative water source storage and distribution plans.
- Three water systems with America's Water Infrastructure Act (AWIA) compliance.
- Participated in planning and execution of Seattle and King County Tolt Dam Failure Emergency Action Plan Tabletop Exercise 09/05/2024.
- Represented the water sector in Washington State 2024 Threat Hazard Identification Risk Analysis (THIRA) and Stakeholder Preparedness Review (SPR) on 10/31/2024.
- Hosted and co-sponsored Healthcare and Public Health Workshop and Tabletop Exercise 04/16/2025 purpose of workshop was to bring together water sector and healthcare sector surrounding planning in water emergencies.
- Collaborated with the agency's Office of Resilience and Health Security to include the water sector in the agency Comprehensive Emergency Management Plan (CEMP).
- Coordinated regional water response across agencies to four major multicounty or regional incidents, large forest fire, Lineage Logistics Warehouse Fire, flooding (impacts to water quality and availability), and winter freeze (pipes burst impacting local governments and schools). Responding to these incidents required coordination with state and local emergency management agencies, health agencies, communication of health messages, providing technical assistance, and ensuring access to safe drinking water.
- Customer service support, technical assistance, and presentations at seven conferences.

More specifics for additional examples are highlighted below.

Cybersecurity

We are the co-chair of the State Cybersecurity Advisory Committee and chair of the water subcommittee. The State Cybersecurity Advisory Committee was established by the state legislature 2022-2023 session and requires the Military Department's Emergency Management Division to establish a cybersecurity advisory committee focused on providing the state legislature with cybersecurity status and advice that is relevant across critical infrastructure sectors. Lastly, we completed our state Cybersecurity Action Plan that detailed a multiagency approach to assessing the status of cybersecurity in the water sector, assessing the needs of the water sector, and moving towards a mechanism for public water systems to routinely address cybersecurity. The ultimate long-term goal is for public water systems that serve a population greater than 3,300 persons to routinely conduct cybersecurity vulnerability assessments, address known vulnerabilities, and complete incident response plans.

We gave cybersecurity-related presentations to water systems on six occasions, including:

- Presentations and TA during Drinking Water Advisory Group (DWAG) quarterly meetings.

- Presenting at Evergreen Rural Water of Washington (ERWOW) conferences.
- Presenting at Pacific Northwest section of American Water Works Association conference.
- Presenting and providing TA at Infrastructure Assistance Coordinating Council (IACC) 2024 workshop.
- Presentation and TA session at the State Cybersecurity Conference 01/28-30/2025.
- Hosted cybersecurity workshop with CISA on 05/07/2025.

We provided additional cybersecurity support and activities.

- Participated in National water and wastewater sector cybersecurity drill and TTX 5/27/2025.
- Assisted two water utilities with application for state and Local Cybersecurity Grant Program (SLCBP) applications.
- Responded to six cybersecurity incidents in water utilities. ODW's role was to coordinate information sharing and actions between local, state, and federal agencies, and provide technical support to affected water systems.

Wildfires

We track wildfires and proactively reach out to water systems that may be affected and offer technical assistance. During the 2024 wildfire season (June-December), our staff drafted a Wildfire and Drinking Water Protecting Sources After Fires fact sheet to aid water systems in recovery efforts. It was published in September 2024. There were 1,609 fires and we conducted welfare checks/offered TA to 401 water systems.

Staff assigned to counties in the northwest area of the state provided support to water systems during the Sourdough Wildfire. The Sourdough Fire was reported on July 29, 2023, on the southwest end of Ross Lake in the North Cascades National Park (Whatcom County). The fire burned over 6,389 acres and closed recreation areas and parts of the state highway. The National Park Service (NPS) water operations team worked with fire fighters to monitor water systems at the Environmental Learning Center, Newhalem Campground, and Ross Lake Resort. Even though the communities were evacuated, it was important for the water operations team to be in contact with responders to make sure fire fighters had access to a consistent water supply.

Staff assigned to counties east of the mountains attended an interagency "virtual resource roundtable (tech-team style)" requested by the city of Medical Lake to discuss wildfire recovery needs. The August Gray Fire had a significant effect on the city and surrounding area, burning over 10,000 acres, destroying 265 structures, and causing one death. Discussion topics at this roundtable included debris removal and site cleanup, temporary housing for displaced families, and adding water and sewer infrastructure to the west shore of Silver Lake. County-assigned staff provide TA to the city on their proposed project to extend public water system connections to affected areas to meet current needs and improve disaster resiliency in the future.

Weather Events

During an extreme weather event which froze pipes across the state in January 2024, staff members assisted water systems throughout the state with health advisories and associated activities due to freezing temperatures and broken pipes. ODW staff also followed up with affected water systems providing support and technical consultation until they restored services and returned to normal operations. Staff assigned to eastern counties are helping several water systems procure new water sources, building capacity and resources for funding opportunities, and enabling water systems to continue providing clean and safe drinking water to their consumers.

Drinking Water State Revolving Fund (DWSRF)

Our DWSRF program provides TA and funding for planning and construction activities to protect public health by implementing water system improvements. DWSRF funding programs provide opportunities for water systems to access low interest loans, possible subsidy through loan principal forgiveness for disadvantaged communities, grants for planning and consolidation activities, and dedicated funding to address emerging contaminants such as PFAS. Our DWSRF staff support these funding programs by providing technical assistance. They use contracts with several providers, focusing on the improvement of the technical, managerial and fiscal capabilities of water systems. To meet the requirements of the federal SDWA and the state Healthy Environment for All (HEAL) Act, small and disadvantaged communities are prioritized for all funding opportunities and TA activities.

DWSRF continues to promote capacity development for water systems throughout the state and encourages asset management to ensure long-term viability in water system management. To further develop asset management activities, DWSRF awards bonus points on construction loan applications if the applicant has:

- Attended asset management training (1 point).
- Developed an asset inventory with expected life assigned (6 points).

We also offer funding to recipients to develop an asset management program. DWSRF applicants that do not have an existing asset management program must develop an asset inventory, including expected life of assets and replacement costs for each asset. Applicants with an existing asset management program are provided with the ability to improve their asset management program. Additional information about the DWSRF program is in our annual DWSRF report.

As part of the Bipartisan Infrastructure Law, states were required to re-evaluate their definition of disadvantaged community (DAC) to consider alternative definitions or metrics in addition to an affordability index that compares water rates to county-wide median household income (MHI). DWSRF updated WAC 246-296 with a new definition of DAC and to allow up to 100 percent percent loan principal forgiveness. The rulemaking additionally underwent the state Environmental Justice Assessment process identified in the HEAL Act to identify any impacts to overburdened communities and vulnerable populations. The definition of "disadvantaged

community" in WAC 246-296 is generalized with a reference to specific social, environmental health, and economic hardship metrics established in the DWSRF construction project guidelines. We update them annually and include a public comment process. The updated rule and accompanying guidance criteria allow for more water systems to be identified as serving DAC and potentially being eligible for grants or subsidy in the form of loan principal forgiveness. The current rule provides eligibility for water systems that qualify as a federally recognized tribe, or communities that have environmental health disparities, social vulnerability indices, or economic hardship. Being identified as a DAC does not guarantee a project will be funded or that it will receive loan principal forgiveness. These factors depend on the priority ranking of the project as well as the amount of subsidy available.

DWSRF offers emergency loans up to $500,000 to Group A not-for-profit water systems serving fewer than 10,000 people to cover emergency recovery activities. Funds from this program provide for recovery activities related to emergencies, such as drought and wildfires. This loan program ensures that loan funding is available to water systems that may be in violation of health and safety standards due to an intervening emergency event. Systems can use the funds for construction, reconstruction, replacement, rehabilitation, temporary repair, generator or treatment equipment rentals, or improvement needed to continue or restore drinking water service. We published the *Emergency Loan and Funding Guidelines* 331-545 (PDF) to explain the requirements for this program and needed documentation to successfully apply.

DWSRF significantly expanded its outreach to promote TA to communities that identified planning and infrastructure needs. Interested communities are able to request TA through the DWSRF Technical Assistance Request Form. Our DWSRF staff then coordinate with appropriate ODW staff to identify potential scopes of work, project needs, and timeframes for completion. A TA provider is then assigned to the system, and meetings are set to discuss the TA to be provided and expectations for project completion. DWSRF has TA contracts for general TA needs, procurement assistance in meeting contract requirements for DWSRF construction projects, and planning and engineering technical assistance.

Small Communities Initiative

We continue to partner with and support the Small Communities Initiative (SCI) through DWSRF set asides in a contract with the Washington State Department of Commerce (Commerce). Since 1999 SCI has assisted small, rural cities and towns, unincorporated communities, counties, utility districts, and water associations in developing more focused projects, making strategic investments, and identifying and accessing appropriate funding sources. Through the help of SCI, twenty-two communities secured over $296 million in state and federal funding for their respective projects, resulting in safer drinking water, environmental protection, and improved infrastructure to serve community and economic development activities. The most helpful aspects of the SCI Program as reported by community leaders over the years include assistance with:

- Defining what the problem is, then articulating and prioritizing goals for the community.
- Developing action plans and sticking to them.
- Convening and facilitating meetings focused on priorities.

- Creating an environment in which everyone can participate in the discussion.
- Helping to understand and complete regulatory and funding program requirements and processes.
- Introducing/connecting local elected officials and staff with appropriate agency staff and creating networking opportunities.
- Helping put a "face" on government.

We funded 1.5 FTE this fiscal year in support of increasing TA requests. SCI worked closely with eighteen water systems to provide technical expertise to prepare for, apply for, or obtain funding and manage infrastructure projects. These water systems often have TMF challenges and would likely be ineligible for financial programs without the assistance of SCI. Direct TA provided by SCI includes:

- Identifying appropriate funds for water system projects.
- Creating and implementing action plans with communities.
- Assisting with funding applications.
- Aiding in procurement documents and processes.
- Meeting other requirements such as contract management.
- Facilitating and documenting meetings.

Additionally, SCI provided limited assistance to seventeen water systems discussing potential funding options for infrastructure improvement and connecting them to other resources.

Rural Community Assistance Corporation

We use DWSRF set asides to fund an agreement with the Rural Communities Assistance Corporation (RCAC) to provide training and TA to small communities and public water systems (PWS) across the state. RCAC assists systems with financial and managerial capacity building projects, such as rate studies, board training, Water System Plans (WSP), and Small Water System Management Program (SWSMP) development.

RCAC has provided TA for four DWSRF-assigned PWS and provided indirect assignment assistance for several water systems. TA provided by RCAC included:

- Cost of service analysis.
- Asset management plans.
- Rate studies.
- Updating and creating SWSMP.
- DWSRF application assistance.

In 2024, RCAC held thirty-one training events for Washington water systems primarily using GoTo Training and had 1,088 attendees. Training topics included:

- Asset Management for Small Water and Wastewater.
- SWSMP.
- Drinking Water Leadership Series.
    - Small Water System State and Federal Laws and Regulations.
    - Association Organization and Governance.

    - Governance Body Roles and Responsibilities.
    - Conducting Board Meetings.
    - Policies Procedures, Bylaws, and Ordinances.
- GIS Technologies.
- Enhancing Skills and Knowledge of Small Utility Clerks.
- Fundamentals of Financial Management for Small Utilities.
- Using Cost-of-Service Analysis for Setting Sustainable Rates.
- Emergency Response Planning for Small Utilities.
- Lead and Copper Rule Revision.
- Public Notification for Small Utilities.
- Cybersecurity for Utilities.

RCAC additionally undertook a limited number of in person training and system assistance efforts, as well as coordinating system assistance through other TA contracts.

Celerity Consulting Group, LLC

We use DWSRF set asides in a limited TA agreement with Celerity Consulting Group, LLC (Celerity) to help small PWS across the state submit Lead Service Line inventories (LSLI) to comply with EPA's Lead and Copper Rule Revision (LCRR). Celerity helps systems conduct extensive record reviews of system service lines and uses county GIS/parcel data and all other available documentation to complete a draft inventory document for the water system to submit.

The deadline for LSLI submittal was October 16, 2024. However, many PWS did not complete their LSLI, and we continue to use Celerity to help water systems complete this requirement. In 2023, Celerity drafted six LSLIs, fifty-two by the end of 2024, and ten so far in 2025.

Evergreen Rural Water of Washington

We use DWSRF set asides in a limited TA agreement with Evergreen Rural Water of Washington (ERWoW) to provide targeted and individualized short-term TA to increase small or disadvantaged PWS capacity to plan for and operate financially viable water systems, and address infrastructure maintenance needs, funding capacity, and regulatory compliance.

ERWoW is providing SWSMP TA for two DWSRF-assigned PWS. However, ERWoW may provide the below TA as assigned by DWSRF.

- Creating or updating SWSMP.
- Conducting a rate study, assessing cost of new connections, or establishing connection fees.
- Creating Capital Improvement Plans (may include design financing plans, project budgets, and utility water purchases).
- Submitting DWSRF loan or grant applications.
- Conducting income surveys.
- Facilitating budget analysis, asset inventories, and integrated asset management.

- Developing an operational budget (including utility revenue, expenses, and capital improvements).
- Assisting in utility board facilitation (board meetings, public forums, townhalls, work sessions).
- Conducting vulnerability and needs assessments to determine water system needs for TA and funding.
- Developing policy (such as standard operating procedures, review of local ordinances and resolutions).
- Developing leadership, board training, management strategies, and planning.
- Operator recruitment, retention, and training.
- Community education and outreach (newsletters, memos, informational meetings).
- Regionalization activities (such as partnerships, consolidations, system restructuring or facility sharing).
- Lead Service Line inventory and replacement project development.
- Emerging Contaminants assessment and development of short and long-term remediation.
- On-site TA (emergency declarations, system repairs, leak detection).

This agreement was executed late into the fiscal year and while only two PWS have been assigned by the end of the fiscal year, more PWS are expected to be assigned to this new TA provider.

Public Knowledge

Small or disadvantaged PWS demonstrate a need for TA and technical aids in undertaking procurement activities to successfully implement projects funded under the DWSRF program. We use DWSRF set asides in a limited TA agreement with Public Knowledge to provide PWS with bidding and procurement activities to meet the requirements of state and federal law. Activities are obligated to meet the requirements of both state and federal laws and regulations regarding procurement. Many systems lack the managerial capacity to successfully achieve the requirements and maintenance needs, funding capacity, and regulatory compliance.

Public Knowledge is developing resources catered for small or disadvantaged PWS including:

- A visual road map.
- A process checklist.
- Procurement 101 training.
- Request for Proposal (RFP) templates.
- RFP scoring template.
- RFP notice template.

Public Knowledge expects to publish final drafts in quarter three of 2025 and to provide direct TA to water systems in late quarter three/early quarter four.

Environmental Protection Agency Technical Assistance Coordination

DWSRF coordinates with EPA's drinking water TA program to ensure efficient communication between state and federal entities regarding assistance for small or disadvantaged PWS. Many TA providers receive funding from both state and federal entities and coordinate to ensure synchronized approaches to common issues and prevent duplicated work between providers. DWSRF staff meet monthly with EPA and other state and private TA providers to discuss the development and distribution of TA resources.

Planning and Engineering Technical Assistance

A portion of the set-asides are used to provide engineering services to small and disadvantaged water systems that do not have a relationship with an engineering firm. In 2025, we contracted with six engineering firms: Easter Research Group inc., Gray and Osborne Inc., JUB Engineers Inc., New Water Engineering LLC, Northwest Water Systems Inc., and TD&H Engineering. Seventeen water systems were assigned to an engineering firm in 2025. Services provided include development or updating a WSP or SWSMP, feasibility studies, alternatives analysis, project engineering reports, construction documents, bid documents, lead service line inventories, and lead service line replacement plans.

Training

DOH staff provide training to complement the work of our TA providers. This includes one-on-one training for water systems. Large groups are addressed at conferences and public meetings, receiving regulatory insight at various venues across the state. Training efforts also include facilitating comprehensive performance evaluations and performance-based goal setting. An example of this effort is a half-day workshop in Tacoma to help over one hundred systems understand and complete their cross-connection control annual reporting requirements.

Conferences, workshops, and seminars provide opportunities for our staff to network with each other and interact with water system personnel. We also participated in the following workshops and conferences.

- PNWS-AWWA Annual Conference.
- ERWoW Annual Conference.
- ERWoW Fall Conference.
- IACC Annual Conference.
- WOW Conference.
- WPUDA Conference Water Workshop.
- WASWD Conference.
- Washington Cross-connection Control Professionals Annual Seminar.
- Spokane Regional CCC Chapter of ABPA Annual Workshop.
- Western Washington Short School and Trade Show.
- Washington State Environmental Health Association Annual Seminar.
- Washington State Public Health Association Annual Conference.

Area-Wide Optimization Program (AWOP)

As a participant in EPA's Area Wide Optimization Program (AWOP), our vision is to protect public health by assuring that surface water treatment facilities are properly designed, constructed, staffed, operated, and maintained. The training, tools, and networking we receive through AWOP participation yields enormous benefits to our staff, utility operators, and drinking water consumers. In October 2024, several members of the surface water team (and other staff) had the opportunity to attend a training Comprehensive Performance Evaluation (CPE) in Cody, Wyoming, along with other AWOP-West participants from EPA Region 8, EPA Region 10, Alaska, Nevada, and Montana. Attending training CPE is important for us to develop the in-house expertise and capability to perform CPE that might be triggered by regulatory actions. We also continue to participate in the workgroup to develop corrosion control treatment performance and monitoring goals as well as the Optimization Assessment Spreadsheet (OAS) that we will use to help systems optimize Corrosion Control Treatment (CCT). The new program being developed by the CCT workgroup will provide our staff with additional tools to help water systems optimize corrosion control. The Spring 2025 remote workshop focused on targeted TA with an example of a water system in Salmon, Idaho.

Each year we recognize water utilities that meet voluntary turbidity goals based on national goals established by AWOP. (See our Performance of Rapid Rate Filtration Plants in Washington webpage.) Low turbidity means better water treatment and better public health protection. We review turbidity data submitted by all 55 rapid rate treatment plants and present bronze, silver, gold, and platinum certificates or plaques to systems the first time they meet the turbidity goals for three, five, ten, fifteen, and twenty consecutive years. Based on plant performance from 2001 to 2024, we have given 125 awards and recognized 42 individual systems.

Prioritized Compliance Strategy

Our compliance strategy ensures compliance efforts address the highest public health risks first. We notify water systems when they violate a regulation and inform them of corrective actions to return to compliance. We provide training and outreach to help systems find appropriate solutions, as well as issue formal enforcement compliance documents to return water systems to compliance. Many of these requirements include developing TMF capacity such as completing planning documents and hiring a certified operator.

When water systems are unable or unwilling to comply with regulations, we support the water system in restructuring (either voluntarily or by court ordered receivership) or consolidation. Small water systems often struggle financially as there are fewer households to support the overall cost of maintaining and improving their water system. These costs include capital financing to periodically replace physical assets such as wells, pumps, distribution mains, and reservoirs when they reach the end of their useful life. In addition, maintenance, monitoring, and personnel costs also tend to be much higher per household for small systems.

In 2023, Stevens County actively sought receivership over Hunters Water District to comply with safe drinking water regulations (arsenic MCL exceedances due to a failing treatment system).

ERO staff continues to work with Stevens County as it prepares its report to the court recommending the water system's future ownership and operation. The system now has an appropriately certified operator and construction of the treatment plant improvements is set to begin summer 2025.

As a result of these challenges, we work to support the consolidation of small water systems in urban and peri-urban areas with larger water systems that have more established TMF capacity to sustain the safe and reliable provision of drinking water. However, consolidation is not a feasible option for many small and more rural water systems. In rural areas, restructuring a water system into different ownership is another option. Public and private entities owning multiple water systems can improve the individual water system's TMF capacity by increasing the economy of scale to these water systems.

The Consolidation Feasibility Study Grant provides funding to community water systems to study the feasibility of owning, maintaining, or serving smaller, struggling water systems that serve ten thousand or fewer people. DWSRF implements the Consolidation Feasibility Study Grant Program on a year-round basis. Maximum grant award amounts are $50,000. DWSRF has received six applications totaling over $300,000 and continues to work with water systems and industry groups to promote the funding.

An example of using compliance data to identify communities in need of capacity development is our work with the Marble Water System. Marble is an unincorporated community in Stevens County with water system compliance challenges relating to source approval, sampling, and capacity. Our Stevens County staff has spent a considerable amount of time working with Marble Water System and members of the community to address compliance challenges. In the last year the system has restructured its board and hired a new certified operator. The system is now working with RCAC to get their unapproved sources approved and in compliance with monitoring requirements. We continue to support this system's return to compliance.

Staff met with the departments of Ecology and Commerce and Pend Oreille County commissioners to discuss the Town of Cusick water and wastewater compliance challenges. The town faces multiple issues, and the goal of the meeting was to identify ways to leverage and coordinate more regionalized efforts to obtain funding and ensure action is taken to return to compliance. Different stakeholders presented challenges, and the group identified several next steps, including applications for funding to support this water system to return to compliance. ODW staff have reviewed and provided comments on the system's construction documents. The system is on schedule to begin construction of the treatment plant improvements by the end of 2025.

Another compliance improvement we have made is to shorten the time allowed for systems to return to compliance with monitoring and reporting violations. Starting in 2024, we began giving systems who received formal enforcement documents thirty days to collect their required samples before elevating enforcement. In 2025, we began implementing this shortened timeline in our informal enforcement documents as well. Our hope is that this will get systems to return to compliance sooner and reduce the number of systems on the ETT report.

1. ***Based on the existing system strategy, how has the State continued to identify systems in need of capacity development assistance?***

We use annual operating permit color, compliance data, sanitary surveys, and planning documents to identify systems that need capacity development assistance. We continue to work with our program staff to identify systems that need TMF assistance through sanitary surveys, special purpose investigations, routine contact, and emergency response work. We target assistance for these systems through our TA providers and program and county-assigned staff. We are researching the ability of our available data management systems to track system capacity.

Annual Operating Permits

Every year, DOH issues each Group A public water system an operating permit after payment of its annual fee statement. We provide a color-coded permit to each water system. We outline the criteria for each color on our Enforcing Drinking Water Regulations webpage. The colors indicate how well the system is meeting the requirements of its operating permit. It also is a way for us to share water system performance information with customers, lenders, local permitters, and other partners. Table 6 below provides information on the permit color of public water systems. The 2024 permit numbers are a snapshot of the permit color as of June 30, 2025. We use this information in part to help select which water systems we offer TA to from third party providers like RCAC.

We maintain a Drinking Water Systems Under Advanced Enforcement webpage with information about water systems currently with red operating permits. A red operating permit category indicates that the water system is inadequate. We also share on the webpage that a red operating permit could result in the water system having difficulty with building permits, on-site sewage disposal permits, food service permits, liquor licenses, and other permits or licenses being denied for properties connected to or intending to connect to the water system. In addition, lending institutions may choose not to finance loans associated with these properties.

Water systems with red, blue, and yellow permits are offered additional TA and are a high priority for our capacity development program.

Table 6: Water System Permit Color Summary by Year

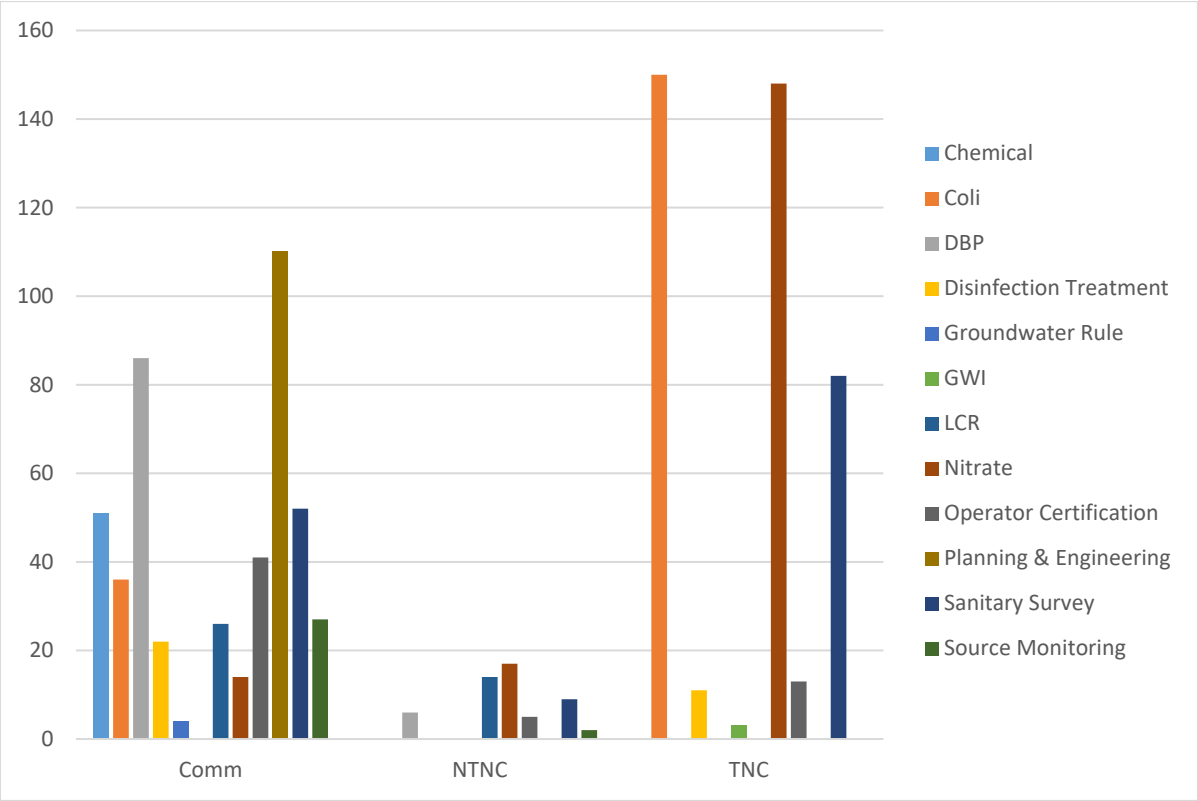
	Permit Color			
Year	Green	Yellow	Blue	Red
2021	3,132	18	921	26
2022	3,150	17	954	25
2023	3,143	17	946	24
2024	3,137	15	959	23

Compliance Data

Systems with health-based violations, other MCL violations, and PFAS state action level exceedances are notified of these violations and provided information on how to return to compliance. Our staff work closely with these systems to determine any capacity development needs. Many small water systems do not have the TMF capacity to address new challenges and emergencies.

The Compliance Assurance and Enforcement staff issued 970 formal enforcement documents between July 1, 2024, and June 30, 2025. Of the 970 formal enforcement documents issued to water systems, 50 percent were issued to community water systems and 44 percent were issued to transient non-community water systems. Table 7 shows the number of enforcement documents issued by drinking water program and water system type.

Table 7: Number of Enforcement Documents Issued



Over the last year, ODW staff issued the most formal enforcement documents for coliform program violations (20 percent of the formal enforcement documents issued) and nitrate program violations (19 percent of formal enforcement documents issued).

TNC systems received the majority (83 percent) of nitrate enforcement actions issued. Additional capacity development is necessary to ensure once nitrate treatment is installed the treatment is monitored and maintained to continued public health protection. The compliance data also highlights the need for the program to adjust the State Significant Non-Complier (SSNC) trigger for seasonal nitrate exceeders.

Additionally, TNCs are much more likely to receive enforcement documents due to coliform violations. Eighty-one percent of the coliform enforcement documents are issued to TNCs,

mostly due to continuous monitoring and reporting violations. TNC systems are also less likely to have a certified operator; however, our regulations do require TNCs to hire a certified operator after being designated a SSNC, if they have a treatment plant, or they are required to install 4-log disinfection system. Capacity development and outreach is necessary to ensure these small systems maintain compliance.

Our regional office staff work one-on-one with systems to help them understand how to return to compliance. This may include providing on-site hands-on training to new surface water treatment plant operators with support from ERWOW circuit riders. Community meetings are set up to help communities and their customers work together to find solutions. Our planners work with homeowner association boards to help them understand and address issues.

When systems need additional support to become eligible for DWSRF loans, we may offer planning and engineering loans, attend meetings to evaluate consolidation or restructuring, and provide third-party TA through our TA contracts.

Water System Affordability Report

DOH in collaboration with the Department of Commerce (Commerce) and informed by a stakeholder advisory group, initiated an Assessment of Need and Feasibility for a Statewide Low-Income Assistance Program for Water and Wastewater Customers Study (study) in fulfillment of a 2023-2025 Biennial Budget Proviso (Washington Legislature 2024). The proviso language directed the departments to study options then offer recommendations for the design of a statewide drinking water and wastewater utility assistance program, that included data collection and coordination, program eligibility, outreach and community engagement in multiple languages, program administration, funding and ongoing reporting. It also required the convening of a stakeholder group to advise the agencies.

This study found that there is a demonstrable need for a statewide low-income assistance program for water and wastewater utility customers and that such a program appears administratively feasible upon completion of additional work to fill data gaps and compare potential program frameworks to ensure the effectiveness of the program. Significant data gaps and challenges were identified, including the need to continue to pursue regionalization of water service delivery through the creation of economies of scale to address affordability issues through reducing cost of service at the water system level.

The report was provided to the legislature consistent with the June 30, 2025, deadline and the stakeholder participants are currently developing outreach and technical advocacy efforts to highlight the vital portions of the report and pursue viable solutions to address the affordability issues identified.

2. During the reporting period, if statewide PWS capacity concerns or capacity development needs (TMF) have been identified, what was the State's approach in offering and/or providing assistance?

Small System TMF Capacity

In many cases, small systems throughout the state continue to struggle to meet technical, managerial and fiscal viability in the face of continuing operational and regulatory challenges. Small systems are more likely to have water quality issues and water quality monitoring violations and are less likely to successfully address emerging contaminants, climate change, drought, and other emergencies. We continue to provide the following assistance and support to these systems.

- Support during coliform and health advisory situations, including developing action plans with water systems and communicating with labs, LHJs, and the media.
- TA to small water systems on water quality, SWP, cross-connection control, and engineering issues.
- Managerial and financial capacity assistance through contracts with RCAC, SCI, and other TA providers.
- Targeted financial TA to improve small systems' financial capacity and position them to apply successfully for funding opportunities.
- Leveraging state and federal funding opportunities for consolidation feasibility studies, promote regionalization and consolidation by providing bonus points in the DWSRF application process for infrastructure projects resulting in these outcomes. We also work with systems to develop the TMF capacity necessary to support the integration of water systems within a challenged area.
- Utelize opportunities tied to the identification of emerging contaminants or more frequent and worsening drought occurrences to promote regionalization and consolidation. Concentrating on alternative source and infrastructure development or system integration tied to treatment needs. The primary focus remains the efficient use of state and federal funding resources to achieve communitywide outcomes instead of persuing more limited individualized and piecemeal solutions.

The greatest challenge we work to address is the lack of capacity of small systems. Many systems cannot provide oversight to an infrastructure project that meets all of the federal requirements, or are not fiscally viable to be able to pay back potential loans. In addition, others cannot provide updated information on their WSPs or SWSMPs to demonstrate their capacity to maintain the infrastructure and pay back a loan. Additionally, due to their size, project costs often create affordability issues for the constituents of a system. We recently collaborated with Commerce to complete a report for the legislature on Water Affordability that highlighted the challenges facing small and medium water systems in maintaining capacity and continuing to provide affordable, safe, and reliable drinking water to their customers. We fund TA contracts to provide services for contract management oversight, engineering and design support, and water system planning support for these utilities in 2024.

Aging Infrastructure

The most recent needs assessment highlighted our concern about aging infrastructure and ensuring water systems are funding the right project at the right time. The requirement for all water systems to undertake long-term and consistent water system planning is a tremendous success to help communities understand their TMF needs both now and into the future. Explicitly including asset management enables us to help utilities better understand their infrastructure limitations and consider costs of maintenance, repair, and replacement.

Unfortunately, water systems are more likely to identify grants as the funding source to address many of the projects listed in their capital improvement plans without continued regulatory oversight to guide them towards more diverse funding solutions. Each year, the SWP Program fields numerous inquiries about ineligible projects because systems ask about grants before turning to loans, or perhaps not doing anything once they learn their projects cannot access SWP grant funding. While the Bipartisan Infrastructure Law (BIL) has provided an influx of funding to improve the infrastructure in our state, much of this funding will be provided as a loan and not subsidy. We continue to utilize state and federal set-aside funding to provide subsidy and grant assistance for small and disadvantaged communities while also providing TA for rate studies to understand the water system operating costs and needed reserves for future improvements and unexpected emergencies.

In addition to ensuring water systems are charging for the full cost of providing water, we understand that increased costs impact low-income customers who are most vulnerable to rate increases. We continue to provide resources for customer assistance programs on our website and will undertake an assessment and recommendations of a state-run utility rate assistance program in the next year. Additionally, we continue to participate in affordability discussions at the state and federal levels to address proper rate structures, the provision of subsidy to well positioned systems servicing disadvantaged communities, and possible rebate programs to benefit ratepayers experiencing economic hardship. Per the language in BIL, we reassessed and chose to update the definition of disadvantaged community in 2024 with formal rulemaking filed May 17, 2024. This definition change clarifies those disadvantaged communities eligible for subsidy under the DWSRF and allows the program to more effectively target TA to communities needing to improve their TMF governance and direct funding to systems that serve DAC populations.

System Resilience to Extreme Weather Events

Extreme weather events continue to be a water system capacity concern in Washington State. Droughts, flooding, and wildfires threaten water systems in our state every year. This was also highlighted in a new legislative requirement to include climate resilience in our water system planning process. Our updated Capacity Development Strategy considers the long-term impacts of the increase in frequency and severity of extreme weather events on utilities.

In 2024, we continued to collaborate with the state Department of Ecology (Ecology) on the Washington State Climate Resilience Strategy update, released in September. We continue to

advocate for funding and programs that support capacity building of drinking water systems. We include natural resource management to prepare for future drinking water scarcity, water quality degradation, and infrastructure impacts to extreme weather events.

Our office is working with partners to implement a new state requirement for Group A community water systems serving 1,000 or more connections to include a climate resiliency element in their WSPs. These water systems will need to determine which extreme weather events pose significant challenges to their systems and assess critical assets and the actions necessary to protect them. We completed the rulemaking this year to establish the requirements and developed information to add to our Water System Planning Guidebook.

We continue to provide emergency response support to water systems during emergencies and provide information to water system customers about how to protect themselves during emergencies. We developed a library of emergency response social media posts for flooding, drought, and wildfires so we can quickly post information such as how to properly boil water in an emergency.

One emergency condition that often emerges in Washington during the late spring or summer is drought. In April of 2025, Ecology issued a Drought Emergency Declaration for the Yakima Basin watersheds, which included portions of Yakima, Kittitas, and Benton counties. In June of 2025, Ecology expanded the Drought Emergency Declaration for 19 watersheds that include all of Whatcom and Skagit counties, and portions of Snohomish, King, Pierce, Lewis, Thurston, Okanagan, Chelan, Clallam, Jefferson and Ferry counties. Ecology updated their Drought Response webpage, and we updated our Drought 2025 webpage and sent a bulletin to water systems throughout the state. During a drought emergency, we:

- Work with the Governor's Office, the Department of Ecology, and other state agencies to monitor drought impacts on water supplies.
- Provide TA to at-risk water systems, including helping them apply for emergency grants.
- Help water systems manage and conserve water and restore safe and reliable water if shortages or outages occur.
- Educate water systems, operators, and consumers about what they can do to ensure an adequate water supply for people, agriculture, businesses, and fish.

Examples of other weather hazard resilience related work includes:

- Representing ESF 3 in the State Hazard Mitigation Workgroup. One of the group's priorities is helping critical infrastructure become more resilient to climate hazards.
- Assisting three utilities with assessing climate hazards in their jurisdiction and using this information in their emergency response plans.
- Assisting two utilities in assessing weather hazards in their jurisdiction and applying for Building Resilient Infrastructure and Communities (BRIC) grants through the state EMA.
- Presenting at Evergreen Rural Water (ERWOW) conference regarding climate hazards, drought and water system resilience.
- Presenting at Association of State Drinking Water Administrators (ASDWA) regarding wildfires and water system resilience.

- Presenting at agency Quarterly Outlook on Weather Climate and Health Meeting regarding how our office uses weather and climate outlooks to support drinking water systems with wildfire response.
- Participating in EPA Creating Resilient Water Utilities (CRWU) regional workshop and training on Building Resilience and Adapting to Climate Change Impacts for Drinking Water and Wastewater Utilities.

In addition, we support proactive projects to build resilience, develop sustainable infrastructure, and be more responsive to water supply demands now and in the future since declarations of drought occur more frequently. Our DWSRF program has additional funding that supports many climate resilience projects for utilities.

Emerging Contaminants

The Washington State Board of Health adopted regulations effective on January 1, 2022, requiring PFAS sampling of all community and NTNC water systems in January 2023, with systems needing to complete sampling between 2023–2025. We continue to identify elevated levels of regulated PFAS in groundwater across the state.

In 2024, we continued to provide information to the public about PFAS with our PFAS Testing Results Dashboard webpage. The dashboard shows which water systems have sampled for PFAS, levels detected, and if the water system took action to reduce levels of PFAS in their drinking water. We provided TA to water systems with elevated PFAS and to local health jurisdictions to support communications and evaluate mitigation options.

ODW joined an EPA grant effort focused on pollution prevention in October 2023. To protect public health, a strategic plan is being created to prevent PFAS from getting into the environment. ODW participates in a targeted work group with technical experts across EPA Regions 8, 9, and 10 looking at SWP tools to assess PFAS risk and susceptibility. The group produced a white paper on prevention strategies for public water systems in 2024 and we are preparing a fact sheet for local community officials with a focus on data visualization.

We continue efforts to implement and expand the Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) EPA-grant program. EC-SDC uses sampling results to identify small or disadvantaged public water systems to initiate proactive outreach to provide funding to mitigate and remediate PFAS, manganese (Mn), or cyanotoxin (a.k.a., harmful algae bloom) contamination. EC-SDC provides funding for TA under DWSRF TA contracts, PFAS sampling, planning and engineering services, construction, and short-term mitigation relief. Seven PWS were identified this year to receive EC-SDC funded TA to prepare water systems for construction and one public utility was chosen to consolidate two small water systems experiencing Mn contamination into their existing distribution system.

3. If the State performed a review of implementation of the existing systems strategy during the previous year, discuss the review and how findings have been or may be addressed.

During 2023, we successfully completed an update to our capacity development strategy, responding to two decades of changes in the drinking water industry. The document, *Washington's Drinking Water Strategy* 331-703 (PDF), creates a comprehensive strategic framework for improving drinking water capacity by identifying the processes we use to make statewide and programmatic decisions. These processes mandate the development of statewide goals, planned program activity, measurement of trends, and consultation with affected communities.

Using this updated approach, ODW will respond to industry-wide challenges, including aging infrastructure, affordability, emerging contaminants, climate change, and workforce depletion. As we implement the strategy, we will develop new tools to address these challenges, including asset management, pursuing environmental justice, developing peer networks, greater consumer engagement, and increasing equity, diversity, and inclusion in our workforce and decisions.

4. Did the State make any modifications to the existing system strategy? If so, describe.

No, we are now in the first year of implementing our revised capacity development strategy and are continuing the work to assess the impact of our strategies on the capacity of our public water systems. This work has been complicated with the addition and proposal of many new federal regulations and funding opportunities, so the story has become more complex.

Successes and Challenges

Drinking Water State Revolving Fund (DWSRF) Success Stories

We have three success stories to share related to the work of our DWSRF team. The first is about Bill Point Water System (ID 06790) in Kitsap County, which served 83 homes on the south end of Bainbridge Island. Their wells were impacted by nitrate, 50 percent of the maximum contaminant levels (MCL). Kitsap Public Utility District (KPUD) volunteered to extend their water main 4,800 feet to serve the Bill Point residents from their South Bainbridge Water System starting in 2020. In order to fully serve Bill Point, KPUD installed a manganese filtration plant at their Well 10 and constructed two 250,000-gallon reservoirs at Deer Park. In the process of consolidating Bill Point into South Bainbridge Water, KPUD was able to consolidate their Island Utility (ID 57776) as well. KPUD received one grant and three loans for a total of $2,600,115. The grant was for the consolidation feasibility study to determine the infrastructure needed to connect the water system, and two loans were Washington State DWSRF loans with 50 percent loan principal forgiveness, while the third loan received no subsidy. KPUD received $2,189,408 total in loan principal forgiveness and a reduced interest rate of percent.

Liberty Lake Sewer and Water District Number 1 (LLWSD) has simultaneously consolidated two water systems, East Side Liberty Lake Improvement Club (ESLLIC) (ID 47145) and Greenridge Homeowners Association (ID 29485). Consolidating Greenridge into LLWSD required the installation of 400 feet of six-inch water main, 8,600 feet of eight-inch main, 33 service meters, reducing the size of the reservoir, and upgrading the booster pump station. Instead of replacing the reservoir. LLWSD determined they could build walls inside the existing reservoir structure to reduce the volume. The smaller storage volume allowed for increased water turnover to reduce risk of bacteriological growth. A portion of the remaining building was converted into a booster pump station. The Greenridge customers are now served safe and reliable drinking water. LLSWD received a $1,995,309 loan with over 87 percent loan principal forgiveness, so they only had to repay $284,000. In addition to the subsidized loan, LLSWD received a state Water System Acquisition and Rehabilitation Program grant in the amount of $1,024,691. The consolidation of ESLLIC has included four phases. This project included installation of 8,100 feet of eight-inch water main, upgrading the well pump station, and installing 55 service meters. The existing pump station for Wells A and B was demolished along with the existing 20,000-gallon storage tank. The well pumps were replaced, a new well pump building constructed with variable frequency drives, updated controls and equipment, and telemetry installed. LLSWD received three loans for a total of $4,631,115. One loan received 50 percent loan principal forgiveness while a second loan received 83.5 percent loan principal forgiveness. Total subsidy was $2,754,093.

The City of Auburn had a 100-year-old transmission main located under the White River. The original replacement design in 2015 had a new 24-inch transmission main bored under the river. Due to tribal cultural and historical concerns as well as geological and permitting issues, the project was put on hold. City staff thought of hanging the water main off a bridge that would cross the White River. Then the team decided to make the utility bridge a pedestrian bridge connecting two portions of the Game Farm Park for the community. By hanging the 24-inch transmission main from the bridge, it reduced the replacement length from 600 feet. An additional 220 feet of 12-inch distribution water main was installed for future use. The bridge allows utility crews to repair the transmission main and connects the main Game Farm Park to the disc golf and campground of Game Farm Wilderness Park. The Park Department provided a $400,000 grant to supplement the $3,737,000 DWSRF loan. Besides improved maintenance access, the project provides a cohesive connection between two portions of one park and a stunning view of the White River.

Assisting Struggling Water Systems

When needed, we are ready to provide TA to struggling water systems and help with coordination between the systems, counties, cities, and other partners to identify and implement solutions. Below are six examples of our recent work to support struggling water systems.

1. Little Lake Mobile Home Park (47535-K). Extensive coordination was required following the arrival of a new operator. Upon review, the operator discovered that existing records for the system's three wells were inconsistent and confusing. Additionally, significant quantity and quality issues with the wells—previously unaddressed by former operators—were identified. An initial

sanitary survey conducted by the Local Health Jurisdiction confirmed the extent of the issues. The ODW engineer then took over support to help the operator establish a comprehensive understanding of water quality at each well and begin the process of obtaining source and design approval for the system. The operator has since applied to the DWSRF TA Program.

2. Mountain View Mobile Home Park (56875-Y). Over the past five years, extensive work has been conducted with the financially challenged owner-operator. The system has a poorly sited well with a history of coliform and *E. coli* detections, as well as elevated manganese levels. During this period, the ODW engineer referred the system to the Statewide Capacity Implementation (SCI) program; however, after consultation, SCI determined it was not a suitable fit. Over the last six to twelve months, the assigned engineer and planner collaborated with DWSRF program staff to evaluate all available options. An application to the DWSRF Technical Assistance Program was submitted by the engineer, and subsequent meetings were held with the owner and TA Program staff. The system is now being assigned to work with an engineering TA provider.

3. Holiday Hills Community Club (33675-E). This system has experienced ongoing challenges for over ten years. Multiple programs—including the ODW engineer and planner, DWSRF and Source Water Protection Grant program staff, and SCI—have been actively engaged in addressing a range of complex issues. These include poor water quality, reduced well production, sections of the distribution system that are poorly located, and persistent governance challenges due to limited community involvement. One resident has often carried the full burden of system governance, and the system has faced significant financial strain, at times with arrears reaching $90,000 due to nonpayment by members. Despite these obstacles, substantial progress has been made. However, continued effort is needed for this remotely located system with no viable consolidation options. The system is currently working with an engineering firm assigned through the DWSRF TA Program.

4. Hannah Heights Owners Association Water System. We continued to work to find solutions for the Hannah Heights Owners Association. The water system serves 43 residential connections. PFAS compounds were detected at about 700 times the State Action Levels and new EPA MCLs. The source was immediately taken off-line. Department of Commerce funding paid for trucking in water from an adjacent water system. Volunteers in the community have continued working with state legislature appropriations to drill a new well. Multiple attempts were made, and they have obtained land in a location where a new well is expected to be successful. DWSRF funding is approved to replace contaminated infrastructure and clean up the site. ODW staff, together with staff from Commerce's Small Communities Initiative have helped to facilitate loans and grants to get the work done. The Department of Ecology has listed the site as a cleanup site under the Model Toxics Control Act.

5. Department of Social and Health Services Western State Hospital. The Department of Social and Health Services (DSHS) operates the Western State Hospital for adults with serious or long-term mental illness with more than 800 beds and 2,500 employees. DSHS also operates the public water system serving the hospital campus with 73 buildings. Drinking water infrastructure on the campus has reached the end of its useful life. *Escherichia Coli* (*E.coli*) and

Legionella were detected in the distribution system and PFAS were recently detected in one of the two wells on campus. The campus is surrounded by a larger municipal water district that is willing and able to provide direct service. Unfortunately, water rights (transferring legal access to the water) are complicated and the condition of aging infrastructure greatly delayed consolidation. In the meantime, DSHS hopes to build a new 500 bed hospital on the same site. For years, we worked closely with DSHS, the adjacent water district, and sister agencies to help facilitate future consolidation. Hundreds of millions of dollars of legislative appropriation will be necessary to update the facility. Appropriation is needed to complete water right transfer, replace aging infrastructure, and consolidate the hospital campus into the adjacent water district.

6. **The Town of Starbuck (ID 83750).** This is a rural community with an aging population in Columbia County that has been struggling for several years. They have struggled to pursue funding to upgrade their water system, including water main replacement to address their 33.3 percent distribution system leakage, reservoir coating, source redundancy, and succession planning. County-assigned ODW staff and DWSRF staff are working with the community by providing technical assistance. ODW staff and Partners for Rural Washington (PRWA) attended their December 2024 council meeting to introduce the TA options available to the community. DWSRF is providing planning and engineering TA to develop a planning document then engineering design based on the capital improvement plan developed through the planning process. PRWA chose the town as one of their pilot communities. They are focused on obtaining funding for a variety of community projects including drinking water projects to be identified in the planning document.

PFAS Implementation

This year, Washington State adopted federal standards for five PFAS compounds and the Hazard Index for a mixture of four PFAS compounds. These standards were added to our drinking water rules as Maximum Contaminant Levels (MCLs). In addition, we are developing plans to update the State Action Levels (SALs) for the regulated PFAS compounds so that they are in line with the newly adopted MCLs. This will result in public notification requirements for public water systems that exceed the newly adopted PFAS MCLs prior to the compliance date of the new MCLs. This also allows us to require Group A-TNC water systems with sources located in areas of known contamination risk to sample for PFAS. We will be asking EPA for an extension of time to apply for our primacy update to incorporate the new PFAS rules.

This reporting period encompasses the third year of the three-year initial monitoring period for PFAS in public water systems. This is an important work effort to discover and support communities across our state impacted by PFAS. This information provides for a more informed public, understanding of frequency and locations of impact, and in many cases, actions taken to reduce PFAS exposure. Specific communication, recommendations, and information regarding PFAS in Washington can be found on our DOH PFAS website.

Our work aligns with the May 2024 announcement of the PFAS MCL released by EPA. EPA's decision to finalize the National Primary Drinking Water Regulation for PFAS reflects a significant

stride toward addressing a pressing environmental and public health concern, with implications extending far beyond regulatory compliance. We have been successful at strategically working with our requirements, so they help utilities meet the initial monitoring requirements under the federal rule as well. We also continue to work to leverage federal funding to both provide relief for initial sampling costs and PFAS treatment.

Our PFAS implementation work has been a collaborative effort with our Environmental Public Health Sciences (OEPHS) division as well as our Office of Public Affairs and Equity (communications support), and ODW.

We have a diverse approach to addressing the issue focusing on communication, technical assistance, and funding to support Washington communities. We met with individual utilities and local communities in support of understanding both the associated challenges and potential solutions for PFAS contamination. We continue to make information available and transparent about the PFAS concentrations found in Washington State through our required monitoring. You can see the results on our PFAS Testing Results Dashboard. Communication efforts continue to be a priority to support public health.

Summary and Next Steps

In 2024, we continued to meet challenges and celebrate successes as we supported water systems to address TMF capacity. Our Drinking Water Strategy, which we updated in 2022, is in line with our vision of supporting our communities to address competing water challenges, such as limited water resources, aging infrastructure, newly regulated and unregulated contaminants, and economic development. The updated strategy focuses on the strengths of what we've built and looks to address the increasing challenges utilities face today like aging infrastructure, extreme weather events, and workforce challenges with operator shortages.

Next Steps for 2025

- Continue efforts to support water systems improving infrastructure by leveraging available federal funding.
- Focus efforts to centrally gather data available in files from our planning program to clarify the capacity of systems statewide.
- Continue to pursue our existing legal authority and funding availability to consolidate water systems to help address small water system issues to:
    - Improve compliance.
    - Ensure ongoing viability.
    - Address Water System Operator shortages.
    - Address emerging contaminants like PFAS.

We look forward to continuing to implement our updated strategy and focus our efforts by utilizing diverse approaches to better support water system capacity development in Washington State.

Appendix A: Acronyms

1.	ASDWA	Association of State Drinking Water Administrators
2.	AWIA	America's Water Infrastructure Act
3.	AWOP	Area-Wide Optimization Program (EPA)
4.	BIL	Bipartisan Infrastructure Law
5.	BRIC	Building Resilient Infrastructure and Communities
6.	CCT	Corrosion Control Treatment
7.	CEMP	Comprehensive Emergency Management Plan
8.	CPE	Comprehensive Performance Evaluation
9.	CRWU	Creating Resilient Water Utilities
10.	DAC	Disadvantaged Community
11.	DOC	Washington State Department of Commerce
12.	DOH	Washington State Department of Health
13.	DSHS	Department of Social and Health Services
14.	DWAG	Drinking Water Advisory Group
15.	DWSRF	Drinking Water State Revolving Fund
16.	EC-SDC	Emerging Contaminants in Small and Disadvantaged Communities
17.	EITs	Engineers in Training
18.	ERO	Eastern Regional Office (ODW)
19.	ERWOW	Evergreen Rural Water of Washington
20.	ESF	Emergency Support Function
21.	ESLLIC	East Side Liberty Lake Improvement Club
22.	ETT	Enforcement Targeting Tool (EPA)
23.	HEAL	Healthy Environment for All
24.	IACC	Infrastructure Assistance Coordinating Council
25.	KPUD	Kitsap Public Utility District
26.	LCRR	Leader and Copper Rule Revision
27.	LHJ	Local Health Jurisdiction
28.	LLWSD	Liberty Lake Sewer and Water District Number 1
29.	LSLI	Lead Service Line Inventory
30.	MCL	Maximum Contaminant Level
31.	MHI	Median Household Income
32.	Mn	Manganese
33.	NPS	National Parks Service
34.	NTNC	Non-Transient Non-Community
35.	NWRO	Northwest Regional Office (ODW)
36.	OAS	Optimization Assessment Spreadsheet
37.	OC&T	Operator Certification and Training
38.	ODW	Office of Drinking Water (DOH)
39.	PFAS	Per and Polyfluoroalkyl Substances
40.	PWS	Public Water System
41.	RCAC	Rural Community Assistance Corporation
42.	RFP	Request for Proposal

43. SCI Small Communities Initiative (Washington State Department of Commerce)
44. SCIPT State Catastrophic Incident Planning Team
45. SDWA Federal Safe Drinking Water Act
46. SDWIS Safe Drinking Water Information System
47. SLCBP State and Local Cybersecurity Grant Program
48. SMA Satellite Management Agency
49. SNC Significant Non-Compliers
50. SPR Stakeholder Preparedness Review
51. SSNC State Significant Non-Complier
52. SWAP Source Water Assessment Program
53. SWP Source Water Protection
54. SWRO Southwest Regional Office (ODW)
55. SWSMP Small Water System Management Plan
56. THIRA Threat Hazard Identification Risk Analysis
57. TA Technical Assistance
58. TMF Technical/Managerial/Financial
59. TPS Third Party Surveyors
60. TNC Transient Noncommunity
61. WSH Western State Hospital
62. WSP Water System Plan
63. WQMS Water Quality Monitoring Schedule