



Meeting Notes
Drinking Water Advisory Group
December 1, 2025

Agenda Item	Notes
<p>2. ODW Updates Holly Myers, Office Director</p>	<ul style="list-style-type: none"> ◆ Staffing updates. <ul style="list-style-type: none"> ○ Planning Section Manager will be Nicole (Regina) Grimm and she starts January 1. Congratulations to Nicole on this new job! ○ We will soon recruit for her old Engineering Supervisor position. ○ We are still adjusting how we do our work, but you should continue to get the service that you have in the past. If there is something that you have questions or concerns about, please reach out to your contacts and we will work to answer it or resolve it. ◆ Yakima Basin. We are working with Ecology (ECY) to help with this situation both now and in the future. We continue to work with all of those affected by the drought this year and there are plans in place for now and in the future.
<p>3. Small Group A Water System Plan and Water Rights Discussion Mike Means, WQPC Manager and John Freitag, Policy Planning Lead</p>	<p>Presentation</p> <ul style="list-style-type: none"> ◆ Groundwater permit exemption—Washington State Department of Ecology ◆ Focus On: The Groundwater Permit Exemption ◆ (Paul Hart): It is a requirement to have a plan of some kind for many of the ways to get funding. His system is updating their SWSMP and working to get their water rights. ◆ (Meade Browne): Thank you to Sam Rodriguez at RCAC for the training that he did up in the Whidbey Island area. <p>Questions</p> <p>Q: (Burt Clothier) What is the benefit of having a plan? Are they a requirement, since that is what ECY is basing their water rights on. A: (From Mike Means) In theory, all systems are supposed to have some type of plan available. (From Nicole Grimm in chat) There are alternative ways that service areas have been defined, such as the original platted area or where the distribution lines are currently located. (From John Freitag) We are working on what we can do. It is on our radar, but our new Planning Team is hoping to look more at this soon. (From Mike Means) A SWSMP is only for a small system that is not going to be expanding. If you are new or will be expanding, you need to have a Water System Plan.</p> <p>Q: (Betsy Norton) Is ECY looking at the cumulative impact on an area with wetlands/streams/lakes of permit-exempt groundwater withdrawals? WE are concerned about in-stream flows impacted locally. This is particular concern under GMA rules this year requiring more density in rural areas - ADU's, for example, in Thurston County are not</p>



	<p>considered a “dwelling” connection for purposes of water system classification. A: (From Holly Myers): That is a question for Ecology. The water resource program nearest you is likely familiar with this issue and can respond. Please reach out if you need contact information for the appropriate ECY WR contacts.</p> <p>Q: (Jeff Johnson-external): How is DOH looking at ADUs as connections?</p> <p>A: We are looking at this further. Right now, they are considered a separate connection if they are not connected to the home. For the Bill during the last Legislative Session, we recommended they be considered connections. Currently, we don’t know what Bills are coming for the 2026 Legislative Session, so we can’t comment on what it might be. We do see the Bills during the process and will comment on those that may affect our work.</p> <p>(From Deborah Johnson): ADUs: Commerce has issued ADU guidance for local governments in enacting codes. Current statute requires cities/towns/counties to allow 2 ADUs/primary unit, and Commerce's guidance encourages a shared connection. Commerce's position has been that because it's smaller, an ADU doesn't consume as much as a primary dwelling so shouldn't be considered as a full ERU. ADUs can be attached or detached but can't be RVs (outside of some provisions for tiny homes, blocked & skirted) as someone asked about. Guidance for Accessory Dwelling Units in Washington State (PDF).</p> <p>(Also from Deborah Johnson) Kirkland policy shared as example Additional Water Service Requirements for ADUs (Reply from Nicole (Regina) Grimm): We are still counting them as connections though. They can use a fraction of an ERU, but they are still using a volume of water that needs to be accounted for. They are likely like RV parks or campgrounds in water volume. Cities that have an "unspecified" would not be affected other than keeping their connections and populations on the WFI, which primarily impacts monitoring requirements.</p>
<p>4. Challenges of Establishing Adequate Water System Rates Discussion</p> <p>Chris Pettit, DWSRF Program Manager</p>	<ul style="list-style-type: none"> ◆ Staff were working with a system where the water users were paying a lot for their monthly bill, but some water users were having a hard time paying the high rates. They started to look at the affordability of the rates aspect of it. ◆ One of the most asked questions the DWSRF team receives is about what is needed to receive funding. One of the biggest needs is to show the long-term viability of a system. ◆ How are you doing with your TMF (Technical, Managerial, and Financial)? ◆ Some of the things that Chris covered in his presentation: <ul style="list-style-type: none"> ○ Repayment Source: General Obligation (GO) vs revenue debt. <ul style="list-style-type: none"> ▪ GO debt is for municipals that can secure their property tax revenue to pay off both their interest and principal. It can be in the form of a bond too.



- We need to see 3-5 years of financial statements. One thing we review them for is to look for trends
- For non-municipal and HOA's, we can look at the tax returns for the financial viability of a system. We can also review CPA prepared or audited statements for non-municipal.
- We can consider Collateral also.
- General Rule: If financial analysis indicates a marginal or negative cash flow over the years submitted for an application, someone on our staff will meet with the applicant to talk about whether the financial risks can be resolved.
- Water systems must generate sufficient revenue for:
 - O&M of the system
 - Replacing capital assets
 - Financial security of the system during an emergency or unexpected changes in their revenue source(s).
- Rate Settings:
 - Best Practice: Analyze and understand future capital needs. Minimize costs and identify efficiencies. Develop multiple rate alternatives.
 - Several different types of rates. You start with a base rate and then add on one of these different types of rates: Uniform Flat Rate, Single Block Rate, Decreasing Block Rate, Increasing Block Rate, and Conservation Pricing.
 - (From Lori Blau): [RCAC Washington Trainings website](#) for schedule and registering for trainings (all free). We have two training courses in December on cost-of-service analysis for rate setting: Dec. 3 and 17. These free training courses are online.

Questions

Q: (Chad): Just curious if others are willing to share rates (flat, flat + per gal after ??) and average % increase per year. A: (Chad's answer): We average 92 residences. We average 3-3.5% increase per year. Flat rate currently at \$825 plus \$10/acre and \$30 for pools (very few pools). We don't have meters yet...Coming soon!

(From Lori Blau): I would be cautious about comparing your rates to other systems. Each system has unique needs. Rate structure is a little different, as Chris covered the main types of rate structures. We frequently see inclining block rates of some kind. The thing to be cautious with this structure is including a large amount of water with the base fee. We have seen some where the included allotment is so high users very rarely hit the amount to trigger the variable rate per (gallon, 1000 gallons, cf).



5. Federal and State Rule Updates

Mike Means, WQPC
Manager

- ◆ LCR Rules
 - The Feds have said they are going to leave as is and would defend it.
 - We are looking at all our rules, WACs, policies, etc. that deal with LCR to make sure we meet all the changes in the LCR Rule and if we don't, we are working to update what needs to be updated.
- ◆ How do we use the population to decide whether it is a Group B or a Group A?
 - Over time, we have been using 2.5 people per connection as an estimate to decide whether a system is a Group A or a Group B.
 - In the most recent Legislative Session, it was decided that we can't use this 2.5 estimate to decide but need to have actual numbers.
 - We can use it to estimate for design purposes, but we can't use it to make the decision on whether it is a Group B or a Group A.
- ◆ Public Water System definition: This was updated to make our wording clearer.
- ◆ PFAS Rules
 - There were three steps that we had to do to get PFAS into our rules. We have finished these steps and PFAS is now in our rules.
 - (From Sophia): [Group A Public Water Supplies – PFAS Exception Rulemaking](#).
 - What happens if the feds rescind any of their rules? Because we have the new requirements written in our rules here, they would still have to be met. The only way we may change anything in our rules is if the Feds find new ways of running the samples to get results and then we may need to change our rules to align with their sampling requirements.
 - (From Derrick Dennis): Link to sign up for free PFAS testing: [Department of Health, Office of Drinking Water PFAS Free Sampling Enrollment Form](#)

Questions

Q: (From Pam Hinthorne): What is the timing for the implementation of the updates for Consumer Confidence Report? What would be the effective date for use?

A: (From Holly Myers): For the CCR, EPA says "Winter" is the timeline. We will keep you informed as we learn more. (From Mike Means): We don't have anything from the Feds yet, so we're waiting to figure out what we need to change.

Q: (From Kim DeFolo) Do you have any initial updates on how the LCRI school and childcare sampling requirements will be implemented in WA? Do you plan to have any requirements of water systems given pre-existing school/childcare rules?

A: The DOH office for childcare does not cover all schools, so we will work with DCYF to make sure all schools are doing what they are required to do.

(From Derrick Dennis): We do plan to do waivers if we can. (From Kim DeFolo): Thank you for speaking to the school/childcare sampling requirements. That



	<p>will be a huge lift for water systems and requires a lot of planning time if waivers are not available.</p> <p>Q: (From Emily Arredondo) Is there a written document with these updates? A: Nothing at the moment, but we'll see what we can do from our end. We do plan to do something but still working on what to do to make it easy to understand.</p> <p>Q: (From Emily Arredondo) Is there a way to estimate the Group B populations? A: For a Group B water system, we can no longer use an estimate.</p> <p>Q: (From Emily Arredondo) For the smaller systems, is there a guidance document for an ADU, is there something for the Group B to follow? A: Nothing</p> <p>Q: (From John Roth) How are seasonal or peaking wells (water sources) addressed in the running annual average versus quarterly average? If wells only operate Q2 & Q3 how would the MCL or RAA be calculated, Thank you. A: (From Sophia): Similar to what is being done right now. Based on the number of quarters, you could still be over the MCL for the RAA.</p>
<p>6. DWSRF Update Chris Pettit, DWSRF Program Manager</p>	<ul style="list-style-type: none"> ◆ Application Cycle closed yesterday. Some great applications came in. ◆ Received 61 applications. <ul style="list-style-type: none"> ○ Got a mix of applications. ○ We will be working quickly to review, prioritize, and rank all of them. ○ We must have the list done by February 1. ◆ 2025 Applications. <ul style="list-style-type: none"> ○ 40 construction loans for over \$200 million. ○ 12 P&E for about \$3 million. ○ 6 consolidation feasibility at \$300 thousand. ○ 1 DWSRC at \$150 thousand.
<p><u>7. Feedback on ODW Customer Service</u> Mike Means, WQPC Manager; and Laura Heinse, Performance Management and Quality Improvement Specialist</p>	<ul style="list-style-type: none"> ◆ How can we improve our customer service? ◆ Purpose is to determine what feedback to collect for a statewide water system survey. ◆ Laura did Slido.com questions with a word cloud. ◆ Laura had them do a survey too. <ul style="list-style-type: none"> ○ Will use some of the responses from the Slido.com word clouds to help update the questionnaire. ○ (From Elizabeth Raney): The survey could also focus on subject areas that are of the greatest interest to utilities (e.g., public notification, planning, treatment for PFAS/Lead and copper, etc.). ○ (From Benjamin Sharbono): Balance anonymity with identifiable data often helps get better information. <p>Questions</p>



	<p>Q: (From Manager Steve) There is a required survey/questionnaire from Washington Surveying & Rating Bureau at least in Island County around early this last summer. What is the authority and requirement for this? It is fairly burdensome. A: (From Jeff Johnson – external): this might have to do with fire systems. (From Mike Wolanek): It is for the fire insurance ratings.</p> <p>Q: (From Jeff Johnson – external) Can ODW put together a matrix of the different rules/policies that are happening? A: This is something that we have done before and is a good way to get info out there.</p> <p>Q: (From Sophia): What date is the rule expected to be finalized? A: From Mike Means): Hope early next year but still going through the process.</p> <p>Q: (From Manager Steve) Where is it published for a specific system's required minimum chlorine residual at distribution entry? We were docked a demerit point multiple times for not maintaining 0.75 residual. A: (From Nicole Grimm) We do a 0.2 based on the reliability of the color wheel, but if someone is certified to use the colorimeters, they can go lower. If a system needs contact time, then it could be different.</p> <p>Q: (From Meade Brown Jr): What is the status of a new State MCL re manganese A: (From Mike Means): At this time, we are not moving forward, but we are looking at them.</p>
<p>8 Agenda Ideas for next Meeting John Freitag, Policy Planning Lead</p>	<ul style="list-style-type: none">◆ (From Grace Gottlieb): Will DOH have reference materials for water system consolidation (such as from Group B consolidate into Group A) from initiation, planning, implementation to project completion? Does it need to go directly to an Engineer to start a conversation? (From Mike Means): This is something we can talk about at our next meeting. (From Emily Arredondo): Grace, there is no form, but you do pass it to a DOH engineer and depending on how recent their Group B was completed, they may or may not request new IOC tests.◆ (From Paul Dudley Hart) The impact of federal funding going forward on ODW.