

DATE: December 29, 2025

TO: Kathleen Buchli, Code Reviser

FROM: Tami Thompson, Regulatory Affairs
Manager



SUBJECT: Rescind Interpretive Statement | Small Water System Management Programs in Lieu of Water System Plans for Non-expanding Systems in Critical Water Supply Service Areas Filed as WSR 01-04-060


This memo serves as notice that the Department of Health (department) is rescinding an interpretive statement titled “Small Water System Management Programs in Lieu of Water System Plans for Non-expanding Systems in Critical Water Supply Service Areas” filed February 5, 2001 and published as WSR 01-04-060.

This statement clarified planning requirements for non-expanding public water systems located within critical water supply service areas. The department is rescinding this interpretive statement because it is outdated and does not reflect the current department business practices.

Individuals requiring additional information on this should contact Mike Means, Water Quality, Policy, and Certification Manager for the Office of Drinking Water at mike.means@doh.wa.gov.

Thank you for your attention to this matter.

cc: Mike Means, Water Quality, Policy, and Certification Manager



OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: January 27, 2026

TIME: 3:04 PM

WSR 26-04-059



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF DRINKING WATER
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January 22, 2001

To: Interested Parties
From:  Alan Rowe
Subject: Interpretative Statement Summary

Title of Interpretive Statement: Small Water System Management Programs (SWSMP) in lieu of Water System Plans (WSP) for non-expanding systems in Critical Water Supply Service Areas (CWSSAs)

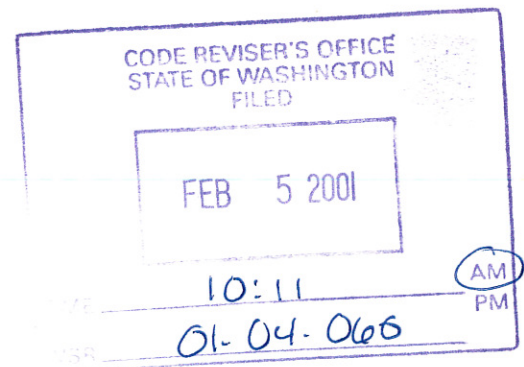
Issuing Entity: Alan Rowe, Operations Manager
Division of Drinking Water

Description of Subject Matter:

A non-expanding water system located within a Critical Water Supply Service Area and required to complete a WSP under WAC 246-293-230(1) may, as directed by the department, submit a SWSMP in lieu of a WSP. A water system utilizing this option will be considered non-expanding by the Department of Health (DOH) and will be notified that they cannot expand unless they complete a WSP in accordance with WAC 246-290-100. The term "expanding public water system" is defined in WAC 246-290-010. Routine updates of the SWSMP will not be required. An update may be required by DOH if warranted.

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Effective Date: January 18, 2001



Consistency Statement January 18, 2001

Topic: Small Water System Management Programs (SWSMP) in lieu of Water System Plans (WSP) for non-expanding systems in Critical Water Supply Service Areas (CWSSAs).
Section: WAC 246-290-100(10)

Purpose: To clarify Department of Health (DOH) planning requirements for non-expanding public water systems (PWSs) located within CWSSAs defined under the Public Water System Coordination Act (PWSCA). (RCW 70.119, Chapter 246-293 WAC, WAC 246-290-100, WAC 246-290-105)

Issue/Question: Should non-expanding systems within (CWSSAs) required to develop a plan pursuant to RCW 70.116.050(1) and WAC 246-293-230(1) be allowed to develop a SWSMP in lieu of a WSP?

Discussion: RCW 70.116.050(1) and WAC 246-293-230(1) require certain non-expanding municipally owned systems within CWSSAs to complete a WSP. This requirement was put into place in 1978. In 1978, WSP requirements were far less rigorous than they are today. Most small systems met the requirement for completion of a WSP by developing an "Abbreviated Water System Checklist" (a short 'check the box' document). In 1999, the elements of the SWSMP (WAC 246-290-105) were expanded. Those elements broadly mirror the WSP requirements found in WAC 246-290-100. The SWSMP has been identified as a key element of 'capacity' as federally defined (for those systems not required to obtain WSP approval).

WAC 246-290-100(10) states that "The purveyor shall update the plan and submit it for approval at least every six years. If the system no longer meets the conditions of subsection (2) of this section, the purveyor shall as directed by the department, submit either a plan amendment the scope of which will be determined by the department, or a small water system management program under WAC 246-290-105."

The cost of development of a WSP has increased tremendously in the past few years. The increasing cost has become an obstacle that many small non-expanding systems are finding more and more difficult to overcome. Many systems outside of CWSSAs that meet the requirements of WAC 246-290-100 (10) are now provided (as determined by the department) alternatives to major 6-year WSP updates.

RCW 70.116 only generally defined minimum requirements to include in a WSP and directed the secretary of the department to "adopt regulations pursuant to chapter 34.05 RCW concerning the scope and content of coordinated water system plans..." Since 1977, the scope and content of WSPs has changed significantly, incorporating many other requirements beyond the intent of the PWSCA. Chapter 246-290 WAC revisions effective in April, 1999, renamed non-expanding PWSs' planning requirements as "small water system management programs" rather than water system plans, however, the content is still sufficient to meet the intent of the WSP requirement under the PWSCA.

Decision:

- A non-expanding water system located within a CWSSA and required to complete a WSP under WAC 246-293-230(1) may, as directed by the department, submit a SWSMP in lieu of a WSP.
- A water system utilizing this option will be considered non-expanding by DOH and will be notified that they cannot expand unless they complete a WSP in accordance with WAC 246-290-100. The term "expanding public water system" is defined in WAC 246-290-010.
- Routine updates of the SWSMP will not be required. An update may be required by DOH if warranted.

This Consistency Statement is provided as guidance to DDW staff to ensure consistent implementation of DDW program elements. Decisions by DDW staff to grant/deny an approval, or to take enforcement action, must be based on an RCW or WAC.