



Dockton Water Association
9710 SW WINDMILL ST
Vashon, WA 98070

March 8, 2023

Richard Rodriguez
Department of Health
Northwest Drinking Water Regional Operations
20425 72nd Avenue South, Suite 310
Kent, WA 98032-2388

Re: Small Water System Management Program 2022 Submittal # 22-0807

Dear Mr. Richard Rodriguez:

Thank you for your comments in your 31 October 2022 letter on our Small Water System Management Program. We offer the following responses:

Comment #1: The system does not have an approved set of distribution system construction standards and specifications. Distribution system projects must be submitted to DOH for review and approval. Please acknowledge.

Answer: Acknowledged. The Association has a standard detail for service connections. A copy was placed in Appendix K.

Comment #2a: Page five of the appendix T, capacity analysis reports 373 full-time single-family residences. The water facilities inventory (WFI) reports 294 full-time single-family and 90 part-time single-family residences. ERU_{ADD} would be underestimated if fewer than 373 residences are full-time. Is the WFI accurate? Is recalculation of ERU_{ADD} warranted? How does the recalculation impact subsequent calculations of capacity?

Answer: At the time of the submittal, the WFI was outdated. The WFI updates were sent to your office and recalculation is not needed. A copy of the WFI showing corrections is in Appendix C.

Comment #2b: How is distribution system leakage (DSL) accounted for in the projected water demand? How many ERUs for DSL will the system plan for?

Answer: The 2021 DSL is added annually in the demand projections. A DSL section was added to the TM (Appendix T) which includes the historic DSL data table, the ERU equivalency, and a description of how it's used in demand projections (see page six).



The Water Use Efficiency Program in the SWSMP (Section 2.9) describes DWAs plan for reducing DSL. We have a demand side goal of reducing residential connections consumption 1.5 % or 49,368 gallons annually over the next six years (Section 2.9 Step 3).

Comment #2c: Page six of the appendix T, capacity analysis reports 10 non-residential connections. The water facilities inventory (WFI) reports seven. Please update the WFI in appendix C.

Answer: The WFI has been updated and sent to your office. An copy of the WFI showing updates is in Appendix C.

Comment #2d: Provide a summary of the capacity analysis clearly showing the limiting factor on capacity.

Answer: A paragraph was added to the TM summarizing limiting factors identified in the capacity analysis. See page 11.

Comment #3: We encourage updating the hydraulic model of the transmission and distribution system.

Answer: The model was updated. See TM for modeling results in Appendix T.

Comment #3a: Absent an update, Compare 2002 and 2022 calculated peak hour demand and maximum day demand. Does the model accurately reflect today's conditions?

Answer: The model was updated. See TM for modeling results in Appendix T.

Comment #3b: Absent an update, Is it possible to do a model calibration, checking actual pressures at hydrants and comparing to the 2002 model predictions?

Answer: N/A, the model was updated.

Comment #3c: Absent an update, Include a copy of the 2002 model in this plan.

Answer: N/A, the model was updated.

Comment #4: Do you have a standard operating procedure for measuring chlorine residual? If yes, consider including. If not, please consider developing.

Answer: We developed one based on the information you provided. See Appendix O.

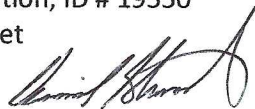
In addition to the comments above, we have updated the SWSMP section 3.2 Long-Lived Asset Replacement section with the new CIP list generated from the capacity analysis in Appendix T. The brief descriptions were requested by others at Health.



Thank you for your constructive comments on our 2022 Small Water System Management Plan. We have included an updated SWSMP incorporating changes noted above. Please let us know if you have any further questions or comments.

Regards,

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 3-14-23

cc: Brietta Carter