

Stillaguamish River Clean Water District Advisory Board

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June 26, 2014

Kevin Plemel
Environmental Health Manager
Snohomish Health District
3020 Rucker Avenue
Everett, WA 98201

Dear Mr. Plemel:

Pursuant to Title 25A.30.030 of the Snohomish County Code, the Stillaguamish River Clean Water District Advisory Board (CWDAB, the Board) offers the following comments and recommendations to the Snohomish Health District (SHD) regarding the 2015 work plan and budget.

First, we commend you and your staff for the work accomplished by the SHD during the past year. We recognize that due to the fiscal downturn, SHD faced budget cuts resulting in reduction of staffing. We were surprised to learn during your presentation at the April CWD meeting that over the last fifteen years the SHD Wastewater Program is now down to about four Full Time Equivalents (FTEs), significantly less than the previous fourteen FTEs. We recognize that these cutbacks can't help but impact the SHD's vital on-site sewage system (OSS) regulation program, and that you must focus primarily on mandated activities.

The following activities and programs are generally ongoing and of mutual interest to our organizations. Where applicable, the CWD Advisory Board recommends that these programs and activities continue.

APPOINTMENT OF RICH OLLIVIER TO CWDAB: We appreciate that the SHD has offered Rich Ollivier, Environmental Health Specialist, for appointment to the position of CWDAB member. Mr. Ollivier is a valued member of the Board, who brings specialized health, sanitation, and environmental knowledge to the table. **The CWDAB can't emphasize enough the importance of active SHD membership.**

PRESENTATION BY KEVIN PLEMEL, ENVIRONMENTAL HEALTH MANAGER: We also appreciate the report that you personally delivered at our May 22nd meeting, and the opportunity to discuss with you the clean water issues we face. **The CWDAB requests that whenever possible you continue to present SHD reports in person.**

SNOHOMISH COUNTY CLEAN WATER LOAN AND GRANT

PROGRAM: It is not yet clear how the Snohomish County Clean

- Water Loan and Grant Program will fit together with CWD Discretionary Fund (DF) OSS grants. Our DF subcommittee is conferring with Lisa Dulude of the County Executive's Office to develop options for consideration by the Board. **The CWDAB requests feedback from the SHD on how these two programs might best complement each other for homeowners seeking assistance.**
- **TOXIC ALGAE IMPACTS ON HUMAN HEALTH AND SHELLFISH:** The health of residents living and recreating in waterways that have ongoing toxic algae blooms are of increasing concern to the CWDAB. The CWD includes at least one of the most polluted lakes in Snohomish County, Lake Ketchum, which requires the posting of health warnings for people and pets more than half the year. The perceived threat to health and safety at Lake Ketchum, and the potential contamination of commercial shellfish beds one mile downstream, was so compelling that the CWDAB voted unanimously to grant up to \$40,000 toward the aluminum sulfate (Alum) treatment that took place in May 2014. Overall, the future investment for treating Lake Ketchum may be as high as \$920,000 over the next ten-year period.

To better prioritize future efforts in the form of CWDAB Discretionary Fund grants and other recommendations, we are interested in learning more about the effects of toxic algae on human health and shellfish. Specifically we would like to know about and support epidemiological and/or public health research and studies on this topic in the CWD and throughout Washington. If none are available, and with consideration for the current fiscal climate, the Board is interested in learning how the Board and the SHD can advocate for such studies or research, and how we can best cooperate with SHD entities wishing to carry out such work. **Some CWDAB members would like to meet with you, and others as appropriate, at a time and place convenient for you to discuss research associated with toxic algae as it impacts human health and shellfish in the CWD.**

- **SNOHOMISH-STILLAGUAMISH LOCAL INTEGRATING ORGANIZATION:** The CWDAB understands that the SHD continues to attend some of the bimonthly Snohomish-Stillaguamish Local Integrating Organization (LIO) meetings. **The CWDAB recommends that whenever possible SHD's representative attend the LIO meetings to help advocate for our mutual goals of improving water quality within the Stillaguamish River watershed.**
- **POINT OF SALE OSS VERIFICATION:** The Board understands that going forward with "Point of Sale Verification" (POSV) activities is not feasible in the current fiscal climate. While POSV is a requirement in other areas, it is not required in Snohomish County. Some stakeholders, primarily from the real estate sector, object on the grounds that OSS inspection and verification is already required by lending institutions, and that only a very small subset of OSS properties are sold without it. They therefore view Point of Sale Verification requirement in Snohomish County as a cost-ineffective expense associated with duplication of paperwork. The Board, however, still believes that POSV could be a valuable tool for identifying and repairing OSS failures. **Should the outlook for POSV change, the CWDAB recommends that the SHD report that information to us so that we may support your effort to develop such a program.**
- **OSS EDUCATION AND OUTREACH WORKSHOPS:** Snohomish County Surface Water Management currently offers at least two OSS workshops per year through their "LakeWise" program, and the Snohomish Conservation District continues to offer OSS workshops including one in Stanwood on October 11th. While not mandated, it is helpful when SHD employees attend these workshops, and offer their services by addressing specific topics and answering questions.

The CWDAB recommends that whenever possible SHD participate in OSS workshops within the CWD.

- **SHELLFISH PROTECTION REPORT:** The Snohomish Health District is identified in the Stillaguamish Shellfish Protection Program as the lead agency for various action items related to OSS management. As such it is important for SHD to participate in Snohomish County's annual review and update of the Stillaguamish Shellfish Protection Program. **The CWDAB recommends that SHD work with Snohomish County SWM to review and update the Stillaguamish Shellfish Protection Program.**
- **ENFORCEMENT REPORT:** Enforcement continues to be the basis of pollution source identification and control. The CWDAB appreciates SHD's commitment to promptly investigate OSS related complaints along with referrals from the County and others. **The CWDAB requests that SHD provide a report to the CWDAB by January 31, 2015 on the number of OSS complaints investigated, general source of the complaints, parcel locations of the complaints, and compliance status within the CWD.**
- **ONLINE OSS OPERATION AND MAINTENANCE:** The Board is pleased that the online Operation and Maintenance (O&M) reporting system is up and running to receive complaints and supply links to a list of licensed OSS maintenance providers, among other features. **The CWDAB looks forward to receiving from SHD's representative on the Board periodic updates on changes and improvements to the OSS Operation and Maintenance portion of the SHD website.**

Thank you for considering our comments, recommendations, and requests. We sincerely appreciate the valuable participation of the SHD in our effort to provide clean water for residents, visitors, pets, shellfish and wildlife.

Respectfully submitted,



Steve Van Valkenburg, Chair



Ragina Gray, Vice Chair

Cc: Dr. Gary Goldbaum, SHD Health Officer
Stephanie Wright, SHD Board of Health 2014 Chair