May 30, 2012

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

Dear Mr. Plemel,

Pursuant to Snohomish County Code Title 25A.30.030, the Clean Water District Advisory Board has reviewed the 2012 “Intergovernmental Services Agreement between Snohomish County and the Snohomish Health District (SHD) for Sanitarian Services in the Stillaguamish River Clean Water District.” We support the Tasks and Deliverables contained in the Scope of Work, including the Stillaguamish Microbial Water Quality Assessment (MWQA), investigation of On-Site Septic (OSS) complaints and correction of failures, direct landowner assistance through design review of resident owner OSS repairs, and evaluating the need for safe shellfish consumption guidelines for Port Susan and South Skagit Bay. We offer the following specific comments:

Stillaguamish Shellfish Protection Program (Task 1B)
The agreement states that the Snohomish Health District will deliver a report detailing SHD’s review and comments on potential updates for SHD actions in the Stillaguamish Shellfish Protection Program. The Board requests that SHD include an addendum to its annual review and update of the Shellfish Protection Program for (a) OSS permitting, (b) complaint response, (c) assurance of repairs, and (d) other pertinent information, in time for inclusion in the County’s July 2012 annual report to the Washington Department of Health, Office of Shellfish and Water Protection.

Online Operation and Maintenance (Task 3B)
The Agreement states that SHD will deliver periodic updates to the Stillaguamish River Clean Water District Advisory Board on its efforts to deploy online Operation and Maintenance (O&M) reporting methods to document O&M provider certification and initial O&M compliance within the Clean Water District. The Board recommends that SHD complete implementation this year of this online O&M reporting system for OSS.
Point of Sale Verification (Task 3B)
The Board fully supports SHD’s program for point of sale (POS) verification of compliance with O&M guidelines, as soon as the SHD’s OSS As-Built (DAVE/CMS) information service is made available on its website.

OSS Education and Outreach Workshops (Task 4A)
The Agreement states that SHD will participate in OSS operation and maintenance training workshops conducted by the Snohomish Conservation District, and will also conduct a separate workshop for OSS Service Providers, in coordination with SHD’s Septic Issues Committee, to raise awareness of best management practices for OSS and of the availability of CWD Discretionary Fund grants for residential OSS repairs. The Board recommends that SHD seek opportunities to participate in or conduct additional homeowner OSS workshops similar to those discussed above.

Thank you for considering our recommendations, and for the valuable participation of SHD as a member of the CWD Advisory Board.

Respectfully submitted,

John Connolly, Chair

Chris Betchley, Vice Chair