12 SATELLITE SYSTEM MANAGEMENT

12.1 Satellite System Program

The District is the primary Satellite Management Agency for Skagit County (SMA #103) as identified in the CWSP. The District provides satellite service inside Skagit County to all areas not already designated as the service area of another state-approved water utility. The District's goal as SMA is to maximize water availability and maintain satisfactory water quality, as well as to assist other public water systems (water systems serving two or more service connections) with technical and administrative tasks. The District runs a Satellite System Program, operating both large and small District-owned systems, assisting troubled and failing water systems, and providing other water systems by contract with various services. By operating more than one water system, economies of scale make it possible for the District to employ qualified personnel, provide good system management and operation, and meet the stringent standards of the Safe Drinking Water Act.

The District will provide Ownership Service to water systems whenever financially feasible and meeting the requirements of the District's Water Policy Manual. The District's Satellite System Program is detailed and explained in Appendix S.

12.2 District Satellite Systems

This section summarizes the status of each of the District's eight satellite systems. As part of the preplanning meeting with DOH, and as part of the appropriate level of planning guideline, it was decided that a full system analysis was not required from each satellite system because these systems have not changed drastically from the time when the 2007 plan was completed. As a result, each system is addressed based on its Coliform Monitoring Plan, 6-year CIP needs, any sanitary survey corrections, and if there is a water loss control action plan based on DSL exceeding 10%. A copy of each sanitary survey can be found in Appendix S.

12.2.1 Fidalgo Island (PWSID 00932 Y)

The Fidalgo Island System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH preplanning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – Projects are identified in the Fidalgo Island System that will improve system hydraulics and allow for the removal of the wood stave Similk Tank.

Table 12-1. Fidalgo Island System 6-Year CIP

Year	Project	Old Pipe	New Pipe	Length (feet)	Cost (2013 Dollars)
2015	Ivy St, Hoxie Ln to Lincoln St; Jefferson St, Ivy St N; Seashell St, Deception Rd to Lincoln St & Erie St, Gibralter S.	1 & 2-inch PL and 8- inch PVC	8 & 12-inch DI	3,019	\$600,000
2015	Slice, Satterlee - Thompson (2,600); Satterlee, Gibralter to Driver (3,462) & Dungeness Ln, Turnstone to Jura Way (550)	4-inch AC	8-inch DI	6,612	\$990,000
2015	Gibralter, Remington to Salmon Beach & Jura Way & Dewey Crest E. 1050 feet to N. Dewey & N. Dewey, SR-20 to Central	4-inch AC	6 & 8-inch DI	7,311	\$1,100,000
2019	Satterlee Road, Summit Park to Driver	6-inch AC	8-inch HDPE	4,800	\$720,000

Sanitary Survey Corrections – The sanitary survey conducted on June 14 and 18, 2010, provided three recommendations:

1. The Bridgeway Tanks should be scheduled for replacement due to their age and vulnerability to earthquake damage. In the interim, please install a screen or flap valve on the drain line discharge.

Response: The screen has been installed on the drain line discharge. There is no schedule on the replacement of the Bridgeway Tanks at this point. We will be performing some hydraulic modeling on the Fidalgo Island System to determine if the proposed pipeline improvements on Slice Street and Satterlee Road will allow the District to take these tanks out of service.

2. The Similk wood stave tank should be scheduled for replacement due to its high maintenance needs and vulnerability to earthquake damage. In the interim, please inspect the roof of the tank to ensure that all openings are screened, and that the mesh size is sufficient to exclude insects.

Response: The openings have been screened. Similar to point 1 above, we anticipate that the upcoming pipeline replacements will allow us to take the tank out of service.

3. The District should evaluate measures such as fencing, intrusion alarms, and telemetry to improve security at its reservoir sites.

Response: The District is evaluating each reservoir site and installing signage, fencing, telemetry, and security measures as appropriate.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Fidalgo Island System is 7.2% and therefore does not require a Water Loss Control Action Plan.

12.2.2 Alger (PWSID 01400 K)

The Alger System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH pre-planning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – As mentioned in the sanitary survey, the District has long-term plans to merge the Alger System with the Judy System through the Bow Hill pump station. Construction of the new pipeline would need to be paid for by a line extension from a third party, and recent discussions with residents of the Lake Samish area in Whatcom County and the Whatcom PUD have re-initiated the conversation of extending wholesale service to that area. The District has taken the position that the extension of service to Whatcom County will only be considered if the water comes from the Judy System and not directly from the Alger System. At the current time, there are no plans for any CIP work for the Alger System.

Sanitary Survey Corrections – The sanitary survey conducted on February 28, 2011, provided the following recommendations:

1. Thank you for the revised coliform monitoring plan. Please provide an additional map showing the distribution system west of the freeway. I recommend that you add a third routine sample site, possibly along Old Highway 99, to better represent the distribution system. All of your coliform monitoring plans should note the Ground Water Rule requirement for a raw water source sample in addition to your normal repeat samples whenever coliform bacteria are found in the distribution system.

Response: A third sample site is currently being selected for incorporation into the Coliform Monitoring Plan.

2. I recommend that you make provisions for backup power at the well site to improve reliability.

Response: As explained in Chapter 9, the District has contracted with a third-party vendor who provides disaster recovery solutions and emergency response services. The vendor's services include providing temporary offices, power, computers, and communication services. The vendor also maintains a copy of the District's ERP, staff contacts, and community contacts. Backup power can be made available within a short period of time.

3. The well is over 50 years old and lacks a surface seal. The District should evaluate the need to replace this well based on the anticipated time frame for merging Alger with the Judy System.

Response: As mentioned above, recent discussions with Whatcom PUD have re-initiated the conversation about extending wholesale service to residents of the Lake Samish area and extending the Judy System to connect with Alger.

4. To ensure the treatment system continues to operate properly, both raw and finished water should be routinely sampled for iron and manganese. Every 3 months is recommended.

Response: Iron and manganese sampling has been initiated at each of our well sites.

5. Please provide current photos of the reservoir hatch, hatch seal, and air vent.

Response: Complete.

6. Cimmaron ridge pump station: re-evaluate the number of pressure tanks now that a variable frequency drive (VFD) pump is being used; provide a pressure relief valve on each pressure tank (on the tank side of the shutoff valve) per Washington State Department of Labor & Industries (L&I) requirements; and screen the relief valve that discharges outside the pump house.

Response: The number of pressure tanks at Cimmaron Ridge is currently the same. The screen has been placed on the relief valve.

7. Appaloosa pump station: Provide a pressure relief valve on the pressure tank (on the tank side of the shutoff valve); evaluate pump capacity for summer demands.

Response: A pressure relief valve was installed on the pressure tank. The pump was replaced in 2013 with a larger pump to provide for additional capacity.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Alger System is 7.3% and therefore does not require a Water Loss Control Action Plan.

12.2.3 Cedargrove (PWSID 11917 4)

The Cedargrove System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH pre-planning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – There are no CIP projects planned for the Cedargrove System in the next 6 years.

Sanitary Survey Corrections – The sanitary survey conducted on February 28, 2011, provided the following recommendations:

1. Thank you for the revised coliform monitoring plan. All of your coliform monitoring plans should note the Ground Water Rule requirement for a raw water source in addition to your normal repeat samples whenever coliform bacteria are found in the distribution system.

Response: All updated coliform plans will incorporate the new Ground Water Rule.

2. The District should evaluate measures to improve monitoring and security at all its reservoir sites. Security measures such as intrusion alarms, surveillance, and water quality monitoring systems should be considered in the context of the District's overall vulnerability assessment and emergency response program.

Response: The District is evaluating each reservoir site and installing signage, fencing, telemetry, and security measures as appropriate.

3. Please contact our certification program staff and let them know that Todd Bos no longer works for your utility.

Response: Complete.

4. Correct freezing problem with upriver distribution sample taps.

Response: Complete.

5. To ensure that the treatment system continues to operate properly, both raw and finished water should be routinely sampled for iron and manganese. Every 3 months is recommended.

Response: Iron and manganese sampling has been initiated at each of our well sites.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Cedargrove System is 3.5% and therefore does not require a Water Loss Control Action Plan.

12.2.4 Marblemount (PWSID AA642 3)

The Marblemount System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH preplanning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – There are no CIP projects planned for the Marblemount System in the next 6 years.

Sanitary Survey Corrections – The sanitary survey conducted on May 30, 2012, provided the following recommendations:

 Add a third coliform sample site at the east end of the system. Update the coliform monitoring plan to include a map and designated repeat sample sites. Discuss policy issues with management.

Response: A third sample site is currently being selected for incorporation into the Coliform Monitoring Plan. All updated coliform plans will incorporate the new Ground Water Rule.

2. Replace the source water sample tap at the well with a smooth nosed model with no interior or exterior threads. This will help prevent false positive samples.

Response: Complete.

3. Screen the discharge pipe on the air vac valve at the well site.

Response: Complete.

4. Remove yellow jacket nests from reservoir vent and hatch.

Response: Complete.

5. Eliminate the gap under the fencing around the storage reservoir.

Response: Complete.

6. Re-evaluate system design capacity using metered water usage.

Response: See below.

7. Revise design standards for remote systems to (1) facilitate future disinfection treatment and (2) minimize water age.

Response: These issues are currently under consideration.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Marblemount System is 7.3% and therefore does not require a Water Loss Control Action Plan.

SYSTEM CAPACITY ANALYSIS

The system capacity analysis performed as part of the 2007 Water System Plan was done using an estimated demand of 400 gpd/ERU, because the system had only recently been installed and there was no water meter history from which to develop a water demand. Now that the District has over 5 years of water demand history, a more accurate system capacity analysis can be completed.

The first step in determining the capacity analysis is to develop a water use factor, a growth projection for the system, and a water demand projection for the system. Based on the number of residential customers and their water demands between 2008 and 2012, a water use factor was developed that was equal to the average of the water use factors for each of the analysis years. Table 12-2 shows the water use factors from 2008 through 2012.

Table 12-2. Water Use Factors from 2008-2012

Year	Residential Meters		
2008	8	477	59.7
2009	11	801	72.8
2010	13	1,166	89.7
2011	14	2,144	153.1
2012	15	1,682	112.1
		Average	97.5

The water use factor that will be used for the capacity analysis is the average from 2008 through 2012, which is 97.5 gpd/ERU.

After reviewing the number of new customers each year between 2008 and 2012, it was assumed that the growth rate for the Marblemount System would be an additional two customers for each subsequent year. Table 12-3 summarizes the growth of the system and the water demand projections up to 2033.

Table 12-3. Water Demand Projections

Year	Number of Customers	Average Day Demand (gpd)	Maximum Day Demand (gpd)
2014	35	10.146	19,277
2019	45	12,888	24,486
2033	73	20,565	39,074

The MDD is calculated by using a factor of 1.9, which was taken from the 2000 CWSP as a District standard.

Using the information presented above, Tables 12-4 and 12-5 show the source and storage analyses for the Marblemount System.

Table 12-4. Evaluation of Source Adequacy for the Marblemount System

	Year				
	2014	2019	2033	Max ⁽⁴⁾	
Projected ERUs and Demand ⁽¹⁾					
Equivalent Residential Units (ERUs)	104	132	211	1,080	
Average Day Demand (gpd)	10,146	12,888	20,565	105,347	
Maximum Day Demand (gpd)	19,277	24,487	39,074	200,160	
Available Existing Source					
Well Pump ⁽²⁾ (gpd)	128,160	128,160	128,160	200,160	
Source Surplus/(Deficiency) (gpd) ⁽³⁾	108,883	103,673	89,087	0	

Notes:

- 1. Projected demands based on the average of existing water meter readings from 2008 2012. ERUs calculated as Average Day Demand / ERU water use factor (97.5 gpd/ERU).
- 2. The pumping capacity of the well pump used for 2014, 2019, and 2033 is 100 gpm. The maximum water right is equal to 150 gpm and is used for the maximum case. However, 11 gpm is used for streamflow augmentation and so all of the existing source values are reduced by this amount.
- 3. Calculation based on Maximum Day Demand.
- 4. Maximum ERUs to be served with existing sources, based on maximum production rate.
- 5. A peaking factor of 1.9 was used to back-calculate the Average Day Demand based on the Maximum Day Demand.

Table 12-5. Evaluation of Storage Adequacy for Marblemount System

	Year			
	2014	2019	2033	Max ⁽¹²⁾
Projected ERUs and Demand ⁽¹⁾				
Equivalent Residential Units (ERUs)(2)	104	132	211	108
Average Day Demand (gpd)	10,146	12,888	20,565	105,347
Maximum Day Demand (gpd)	19,277	24,487	39,074	200,160
Available Source (gpd)				
Water Treatment Plant Source(3)	128,160	128,160	128,160	200,160
Multi-Source Credit (gpd) ⁽⁴⁾				
Required Storage Components				
Operational Storage (gal) ⁽⁵⁾	10,569	10,569	10,569	10,569
Equalizing Storage (gal) ⁽⁶⁾	964	1,224	1,954	10,008
Standby Storage (gal) ⁽⁷⁾	41,625	52,874	84,369	43,367
Fire Flow Storage (gal) ⁽⁸⁾				
Required Storage Criteria				
Greater than 30 psi at highest meter (gal) ⁽⁹⁾	11,533	11,793	12,523	20,577
Greater than 20 psi at highest meter (gal)(10)	53,157	64,667	96,892	63,944
Existing Storage Greater Than 30 psi (gal)(11)				
Marblemount Reservoir	63,944	63,944	63,944	63,944
Storage Surplus/(Deficiency) at 30 psi (gal)	52,411	52,151	51,421	43,367
Existing Storage Greater Than 20 psi (gal)(11)				
Marblemount Reservoir	63,944	63,944	63,944	63,944
Storage Surplus/(Deficiency) at 20 psi (gal)	10,787	(723)	(32,948)	0

- 1. Projected demands based on the average of existing water meter readings from 2008 2012. ERUs calculated as Average Day Demand / ERU water use factor (97.5 gpd/ERU).
- 2. Number of ERUs is based on Average Day Demand divided by 97.5 gpd per ERU.
- 3. Available source is assumed to be the pumping capacity of the well pump of 100 gpm. The maximum water right is equal to 150 gpm and is used for the maximum case. However, 11 gpm is used for streamflow augmentation and so all of the existing source values are reduced by this amount.
- 4. No multi-source credit is used.
- 5. Required operational storage is based on 2 feet of storage in the tank.
- Required equalization storage is the greater of either [(PHD Total Available Source) * 150 minutes] or [5% of MDD].
 PHD: (Maximum Day Demand per ERU / 1440) * [(C) * (N) + F] + 18
 - (C & F values obtained from Table 5-1 in DOH Dec 2009 WSDM)
 - (N is the number of ERUs)
- 7. Required standby storage for existing source = greater of (2*ADD Multi source credit) or 200 gallons per day per ERU. PUD has a goal of 2*MDD per ERU, equivalent to 600 gallons per ERU.
- 8. Required fire flow storage is nested within the standby storage.
- 9. Total required storage greater than 30 psi is equal to the total of operational and equalizing storage.
- 10. Total required storage greater than 20 psi is equal to the total of operational, equalizing, and the greater of standby or fire flow storage.
- 11. The 20 psi and 30 psi requirement is based on the highest service within any given pressure zone, and total storage available within the system.

As shown by the above analysis, the capacity of the Marblemount System is limited by the storage capacity to a maximum of 108 ERUs.

12.2.5 Mountain View (PWSID 03774 Y)

The Mountain View System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH preplanning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – There are no CIP projects planned for the Mountain View System in the next 6 years.

Sanitary Survey Corrections – The sanitary survey conducted on April 16, 2012, provided the following recommendations:

1. Please provide a revised coliform monitoring plan, incorporating Ground Water Rule requirements.

Response: All updated coliform plans will incorporate the new Ground Water Rule.

2. The well casing needs to be provided with an inverted screened vent.

Response: Complete.

Water Loss Control Action Plan – The District has only been tracking the DSL for the Mountain View System since 2012. The 1-year DSL is approximately 15.2%, but there is not enough information for a 3-year rolling average. At this point, the District does not have a Water Loss Control Action Plan for this system, but it is being monitored because of the high DSL. The system is constructed of aging 3-inch-diameter galvanized pipe that is in need of replacement. However, instead of replacing the pipe and the wellhead piping, the District prefers to consolidate this system with the Judy System. The District has approached DOH about possible funds to assist with the consolidation, but no plan has been developed at this time.

12.2.6 Potlatch Beach (PWSID 69034 L)

The Potlatch Beach System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH preplanning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – There are no CIP projects planned for the Potlatch Beach System in the next 6 years. Recent projects have included replacing the pump to the higher pressure zone; adding telemetry between the well, reservoir, and plant; installing a new magnetic flow meter at the plant; and changing the chlorine injection point to improve contact time.

Sanitary Survey Corrections – The sanitary survey conducted on March 14, 2012, provided the following recommendations:

1. Obtain certification for day to day operators.

Response: In progress.

2. Install a splash block on the reservoir overflow and a flap valve or screen on the drain line discharge.

Response: Complete.

3. Install an ASME pressure relief valve at pump station; consider backup power.

Response: The pressure relief valve is installed. The pump station has the ability to be fed from a temporary generator, but the District is still considering the capital and maintenance costs of providing full-time backup power.

4. Because sea water sources are vulnerable to contamination by viruses and to provide a multiple barrier or protection, the level of disinfection treatment needs to be increased to provide at least 99.99% (4-log) virus inactivation. Please submit a report by September 1, 2012 to address this issue.

Response: The District has changed the location of the chlorine injection point to improve the contact time. The District would like to discuss the issue of multiple barrier protection at this location prior to submitting a report.

5. Evaluate alternatives to resolve the pump corrosion issue.

Response: A new pump that had many improvements was installed in February 2013, and this pump has currently lasted twice as long as any previous pump.

6. Please send a copy of your revised coliform monitoring plan that includes the new sample stations and incorporates the new Ground Water Rule requirements.

Response: An updated coliform plan will be forwarded to you.

7. Complete a written monitoring plan for stage 1 disinfection byproducts. I gave Darlene a template she can use for that purpose.

Response: In progress.

8. Secure the well cap on the emergency well.

Response: Complete.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Potlatch Beach System is 8.4% and therefore does not require a Water Loss Control Action Plan

12.2.7 Rockport (PWSID 73600 6)

The Rockport System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH pre-planning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule changes has been completed.

6-year CIP Needs – The District is planning to remove and replace the Ecology blocks and stabilize the bank at the access road to the reservoir. This project is being planned for 2014 at an estimated cost of about \$75,000. Future projects will be dependent on the overall responsibility of the well and the ongoing discussions of the ownership of the well with State Parks.

Sanitary Survey Corrections – The sanitary survey conducted on February 28, 2011, provided the following recommendations:

1. A screened vent should be installed on the well casing to allow controlled entry of air when the submersible pump turns on.

Response: Complete.

2. The fence at the reservoir site needs to be repaired. The District should evaluate measures to improve monitoring and security at all its reservoir sites. Security measures such as intrusion alarms, surveillance, and water quality monitoring systems should be considered in the context

of the District's overall vulnerability assessment and emergency response program.

Response: The District is evaluating each reservoir site and installing signage, fencing, telemetry,

and security measures as appropriate.

3. Please meet with State Parks and clarify roles and responsibilities for their system. Now that Rockport State Park is day use only, can the State Park system be incorporated into the PUD

system?

Response: The District has met with State Parks a number of times and indicated the desire to incorporate the State Parks well and reservoir in the District's system, and provide State Parks

with a connection off that system. State Parks is in favor of the District's proposal, but does not want to relinquish the water right to the well. The District has solicited the assistance of DOH to

mediate this issue.

4. Thank you for the revised coliform monitoring plan. All of your coliform monitoring plans should

note the Ground Water Rule requirement for a raw water source sample in addition to your normal repeat samples whenever coliform bacteria are found in the distribution system.

Response: All updated coliform plans will incorporate the new Ground Water Rule.

5. Correct freezing problem with upriver distribution sample taps.

Response: Complete.

6. Please contact our certification program staff and let them know that Todd Bos no longer works

for your utility.

Response: Complete.

7. Locate the missing TTHM and HAA5 sample results for 2008, or re-sample in August 2011.

Response: The results from 2008 were not located and new samples were taken in August 2011.

8. To ensure that the treatment system continues to operate properly, both raw and finished water

should be routinely sampled for iron and manganese. Every 3 months is recommended.

Response: Complete.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Rockport System is 15.7%. This high rolling average is attributable to an excessively high DSL in 2010 of 31.8% due to

Skagit PUD Water System Plan August 2014

12-13

water leaks, aging meters, and limited telemetry to alert staff of tank overflows. Since then, the DSL has been 8.0% in 2011 and 7.2% in 2012. While a formal Water Loss Control Action Plan has not been developed, the District has improved telemetry to the Rockport System, replaced meters on the system, and maintained its weekly inspection of the system to stay on top of water loss issues. It is expected that the 3-year rolling average will drop below 10% after reporting of the 2013 DSL.

12.2.8 Skagit View Village (PWSID 96879 5)

The Skagit View Village System has not changed significantly from the 2007 plan in terms of water demand and system infrastructure. Therefore, a detailed system analysis will not be conducted as a part of this plan. The following items will be addressed per the requirements of the DOH pre-

planning meeting:

Coliform Monitoring Plan – The updated Coliform Monitoring Plan to reflect the Ground Water Rule

changes has been completed.

6-year CIP Needs – There are no CIP projects planned for the Skagit View Village System in the next 6

years.

Sanitary Survey Corrections – The sanitary survey conducted on May 22, 2013, provided the following recommendations:

1. Seal the opening of the reservoir overflow discharge or replace it with a flap valve.

Response: Complete.

2. Replace the reservoir hatch seal, as it is showing signs of deterioration.

Response: Complete.

3. Complete the remaining elements of your draft revised coliform monitoring plan.

Response: In progress.

4. Develop a system-wide program for routine flushing and exercising of distribution system valves.

Response: Complete.

5. Continue to explore options to assure availability of portable generators and fuel during emergency conditions.

Response: As explained in Chapter 9, the District has contracted with a third-party vendor who provides disaster recovery solutions and emergency response services. The vendor's services include providing temporary offices, power, computers, and communication services. The vendor also maintains a copy of the District's ERP, staff contacts, and community contacts.

Water Loss Control Action Plan – The 3-year rolling average for DSL for the Skagit View Village System is 6.9% and therefore does not require a Water Loss Control Action Plan.

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