

## Dungeness Wastewater Management Alternatives

### Public Comment Responsiveness Summary

The Dungeness Wastewater Feasibility Study is an activity of a Centennial Clean Water program grant, “MRA Septic Solutions” (G1100174), contracted between Clallam County Health & Human Services and WA State Department of Ecology. One of the grant deliverables is a summary indicating how the project responded to public comment received—to be presented to the County Board of Commissioners.

By design, public input was solicited and received in a variety of formats throughout the project. Clallam County Environmental Health worked with Parametrix (engineering consultant out of Bremerton) to implement a Public Involvement Plan prepared for the Feasibility Study (FS), including maintaining a webpage. By the project’s conclusion, the public process included the following opportunities for participation:

<b>Date</b>	<b>Audience/Location</b>	<b>What</b>
May 24, 2012	Study Area community (Dungeness Schoolhouse)	<b>Workshop #1:</b> Presentation of project, survey potential issues
June 23, 2012	Study Area community (Three Crabs Restaurant meeting room)	<b>Workshop #2:</b> Presentation of project, survey potential issues
February 9, 2013 <sup>i</sup>	Study Area community (Dungeness Schoolhouse)	<b>Workshop #3:</b> Draft FS (full presentation)
February 13	DRMT (Dungeness River Audubon Center)	Draft FS (briefing)
February 19	Clallam County Board of Health (Courthouse)	Draft FS (briefing)
March 9	Study Area community [DRMT and Planning Commission members encouraged to attend] (Dungeness Schoolhouse)	<b>Workshop #4:</b> updated Draft FS (full presentation)
March 13	DRMT	Update
March 20	Clallam County Planning Commission	Draft FS briefing
May 8	DRMT	Update
May 21	Board of Health	<b>Forum #1:</b> Final Draft FS (full presentation)
June 18	Board of Health	<b>Forum #2:</b> Short FS presentation and introduction of five project conclusions via Dr. Locke
July 16	Board of Health	Approval of five conclusions
July 23	Board of Commissioners Worksession	Presentation of Responsiveness Summary

Notification to study area residents and other stakeholders included:

- 5 postcards announcing the four listed Workshops and Forum #1, mailed to property owners in the study area (addresses obtained from County Tax Assessor’s database);
- 5 press releases announcing the four listed Workshops and Forum #1 (mostly aired/printed)
- About a dozen emails sent to “interested parties” identified at public events

Methods of soliciting public input included:

- public survey conducted May-July 2012 (results reported in FS appendix)

- resident questionnaire conducted February-March 2013 (results reported in FS appendix)
- oral comments and questions received at FS Workshop #4 (answers reported in FS appendix)
- oral comments received at various venues and Forums (responses reported in the table on the following pages)
- written comments accepted after FS Workshops and Forums (results reported in the table on the following pages)

The FS documents the public process in detail in Section 1.5 and Section 7, and provides meeting notes and responses to questions received at the Workshops in Appendices B and E. Please refer to the FS, posted on the project webpage, for further detail:

<http://www.clallam.net/HHS/EnvironmentalHealth/DungenessWastewater.html>

As evidenced in the Workshop notes, by the end of Workshop #4 in March 2013, prevailing community sentiment was against a collection system or new infrastructure. The following messages were common:

- existing regulations should be enforced before imposing a new method of wastewater management
- inspection rates and compliance should tracked, documented and publicized—good or bad
- more data should be collected that would link bacteria in marine water to specific sources
- there should be a guarantee that changes imposed will result in improved water quality
- centralized collection is not worth the cost

Additional input that was common included:

- some lots are unbuildable without a sewer
- sea level rise (and increasing erosion) should be addressed by County
- nutrient input from OSS should be investigated more closely
- any future fee should reflect individuals' inspection compliance history

In terms of priorities, while some community members see the benefit over the long term of centralized sewage collection and are prepared to move in that direction, many more are not. Input from agency stakeholders on the four management alternatives presented by Parametrix at DRMT, BOH, and other meetings was either neutral or in favor of centralized collection and treatment. The wastewater management alternative selected for implementation by the County is the first discussed in the FS: maintenance of onsite septic systems.

From all participants there was strong agreement that the County could and should uphold the law and immediately improve enforcement of onsite septic regulations, especially concerning maintenance. These actions are within the authority of, and the responsibility of, the Clallam County Board of Health.

Attached to this Summary is a digest of comments received on the FS and how the project responded to each. The final FS, with this Responsiveness Summary included as Appendix I, will be posted on the County's project webpage. A press release and email to all "interested parties," the Board of Commissioners, and the Board of Health will close the project.

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<sup>i</sup> Notification for the February 2013 workshop was minimal due to inadvertent use of an incomplete mailing list; however, participants included several representatives from stakeholder agencies and their input was very useful. The presentation was repeated on March 9 with an improved turnout including dozens of study area residents.

Digest of Submitted Comments--Dungeness Wastewater Alternatives Feasibility Study (March-July 2013)

Commenter	Date	Comment	Response	Action
Charles Lappenbusch	3/6/13 email	use 50% contingency instead of 35%	PMX comfortable with 35% after consideration of comment	Prelim. Reply emailed 3/8
	<i>Attachment: 130305-FEB 13</i>	Life-cycle costs of each alternative should be included in FS (e.g., 3% over 20 year term)	PMX will integrate this information in later drafts	Personal contact at public meetings
	<i>DRAFT ALTERNATIVE MATRIX.xlsx</i>	7 or 8 revisions from Jan. draft to Feb. draft - concerned about why they were made		
		please send updated cost info for conveying to Sequim sewer	Damon sent	
		Meets with his HOA in July; wants responses to these points by then		
	3/16/13 email	Requests updated cost info for purchase of reserve for City sewer	Damon responded via email	replied 3/20/13
		Repeats concern about under-estimating contingency		
		Tentatively supports connecting to City sewer, but depends on final cost estimates and further justification of contingency used.	noted	
	3/20/13 email	requests continual updates; he presents to his HOA in July	(on email notification list)	replied 5/13/13
	5/23/13 email (written comment to BOH)	First, requests copy of BOH meeting minutes from 5/21/13, and that his chance to comment remain open until he has reviewed them.	Dr. Locke oversees preparation and approval of minutes	Lori Kennedy replied that she was forwarding his request to Cheryl Williams
		Second, he is in tentative general agreement with the choice to enforce existing OSS regulations (as the alternative to proceed with)	noted	
		Third, requests copy of draft regulations pertaining to OSS		passed to Andy Brastad
		Fourth, compliments project staff and contractor	noted	
		Fifth, requests any add'l information that might help him brief the Dungeness Beach HOA in mid-July 2013	(on email notification list)	
	6/18/13 BOH meeting; letter submitted, read at meeting	Thanks BOH members for attention to detail on this topic (FS)		
		He has participated in most meetings and placed several items in the record. Personal position is continue with OSS unless a centralized system is economically feasible and constructable.	noted	
		Has observed Three Crabs Rd owners support functioning OSS		
		Prefers that BOH and BCC fully understand the total source of pollution; data probably doesn't identify all sources	noted	
		Cost of solution should be borne proportionately among sources	noted, for implementation phase	note for Andy Brastad
		Requests additional information we can provide		
	7/16/13 BOH meeting; letter submitted, read at meeting	Costs and enforcement of any solution should be shared proportionately (only 2.4% of MRA residents are in study area; only 1% are along Three Crabs Rd.)	noted, for implementation phase	note for Andy Brastad
		Concerned that 3/4 of OSS in study area are out of compliance means needing repair, vs. needing inspection	(the latter is the case - out of compliance with inspection)	
		Supports the five recommendations	noted	
		Is presenting to Dungeness Beach homeowners assn. on Sat.; offers to convey messages or questions. Requests additional information; will report back if HOA asks him to.		electronic version of letter forwarded to BOH

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Phil Smith	3/5/13 email	What is the contamination specifically?	Info from studies of fecal contamination and nitrates in groundwater	email reply 3/8, including links	
		Where is it coming from, and how determined?	[see MST study link]		
		Did the determination take into account other potential sources in the watershed?	listed mission of Clean Water Work Group and shellfish protection district		
	3/22/13 email		Opposed to community WW Tx options due to lack of evidence that OSS from Three Crabs or Golden Sands are causing contamination in Bay	noted	replied to all 3/26
			County should concentrate on enforcing existing requirements or inspection and repair		
			(Quotes from Battelle MST study and effectiveness monitoring study; somewhat out of context.)	debatable whether Battelle is making the point he suggests they're making	
			Attachments from "Harold":		
			<i>Dungeness Wastewater Treatment Feasibility Study_2013_Comments.doc</i>		
			<i>Final Microbial Source Tracking in the Dungeness Watershed_2009_Excerpts.doc</i>		
			<i>Three Crabs Area Assessment by Clallam Conservation District_2009_Excerpts.doc</i>		
<i>Graph #1.bmp</i>					
<i>Graphs #2, #3.jpg</i>					
<i>Table #1.bmp</i>					
Steve Jamieson	3/4/2013 email	questions the value of acting on this study until existing regs are effectively enforced	noted	Preliminary email reply 3/4	
		What level of FC or nutrients is attributable to OSS (for each sub-area)	(not possible to quantify most of these)		Meeting notes from 3/9 emailed to him on 3/21
		For each wastewater alternative, what level of water quality improvement could be expected (for each sub-area)	Not quantifiable		
		How much of the pollution is contributed from outside the study area? I.e., what % is from dairy, livestock, wildlife, etc.?	Battelle study does best possible job of explaining this		
		If conventional or "unknown" OSS were brought up to current standards, how much would pollution be reduced?	Not quantifiable		
		Why are only 25% current on inspections?	Good question (could be lack of enforcement?)		
		Would investment in advanced OSS be compensated for, if they were required to participate in a centralized alternative?	noted, for consultants		
		If pollution does not decrease as a result of a sewer, will residents be compensated for their expenses?	not commonly done		
		Advise when the topic comes before the BCC. Wants to be on notice list and have time to review next draft.		on email notification list	
		6/18/13 BOH meeting oral comments		Need established benchmark for fecal coliform levels	DOH has standards for marine waters, Ecology has them for fresh waters, Health has them for drinking water
Concerned that there is an approved OSS management plan that is not being enforced	Good point				

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		If fees instituted, whole County should pay them	for implementation phase	for Andy Brastad
	7/16/13 BOH meeting oral comments	Concerned about mistaken date on email notice; suggests postponing action a month <b>Agrees with recommendations</b>	Date was correct in other places, and day (Tuesday) was listed in other places noted	no action
		Complete source identification should be done over long term	(prohibitively expensive and time consuming)	
		How will effects of any instituted changes be measured?	OSS database tracks inspections; state DOH monitors marine water quality monthly	
John Lewis	3/11/13 email	We need data that tells us whether pollution is caused by human, animal, or fowl.	Sent him bullet list of project goals from webpage, which address issues <u>other than</u> water quality (long-term viability, property values, suggestion noted	Prelim. Email sent 3/12
		If the Seashore Lane area has a problem it's caused by farm animals and water fowl, not humans.		
		Study scope should be expanded. (all creek outflows and Bay shoreline, esp. Jamestown Rd and beach area)	Study area boundaries set at time of grant application without prejudice, in consideration that the HOA may be interested in options.	Email sent 3/20
		Take time to do it right. Answer remaining questions, don't make hasty conclusions.		
	3/20/13 email	Seashore Lane neighborhood official feedback (letter)		email reply 3/20
	<i>Attachment: FINAL Feedback and Option Choice 03192013.pdf</i>	Preferences, in rank order: 1. continue to use individual OSS mound systems 2. install clustered OSS (one or more) to service all 14 home sites when the need arises The neighborhood will resist participation in community-wide Tx and disposal system	noted	
		Critique and input to FS draft (4 pages)	Will be considered in next draft (by consultants)	
		Summarizes reasons why Seashore is a unique area compared to the other areas in the FS	noted	
		Suggests looking for solutions for each sub-area separately	noted; this is being considered	
	3/20/13 email	Thanking us for response and information.		
	response to our email	<b>Homeowners agreed to track and report inspection compliance.</b>	noted (this is desired outcome if preferred alternative is maintaining ind. OSS)	
	6/14/13 email	Suggests mentioning the Red-to-Green data collection process in our list of recommendations for managing OSS	we may add this	email reply 6/18
		Points out errors in the map and table included in the BOH packet (Seashore Lane properties include two that are not used (and therefore not inspected) and one that is a mound, but is listed as gravity)	database results have known errors; Adar has documented the problems but IT and/or Tom Shindler are needed to resolve	

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	7/16/13 email response to project update email dated 7/11/13	on behalf of the Seashore Lane BPOA, offers full agreement and support of the study outcomes (listed in original email)	noted	
		Homeowners agreed to track and report inspection compliance; striving for 100%		will be featured in future outreach, report
Dick & Diane Holdren	3/20/13 email	Lots on Three Crabs and Golden Sands that are currently unbuildable, and may still be if sewer went in due to wetland critical areas or other restrictions.	noted	reply to all 5/13/13
		Questionnaire implies people could opt out of a sewer program, making it more expensive for those that opt in - and very few would.		
		If everyone is required to participate in a sewer, but unbuildable lots would remain so, then those owners would abandon; suggests re-calculating to get realistic cost estimates per lot.	noted; passed on to consultants	
		Supports improving current systems but make it realistic: most on fixed incomes can't afford annual costs plus already-high property taxes - and finding new buyers would be nearly impossible.		
Connie Beauvais	3/20 Planning Commission	Better define compliance problem and inventory existing conditions	all noted; more data prepared on compliance (inventory is part of current grant scope)	Reply to Steve Gray 5/13/13
		Enforce existing regulations		
		How much would pollution decrease if all systems were in compliance?	(not quantifiable)	
		Concern about removal of the water volume if sewer conveyed it out of area	Volume of septic recharge is minimal compared to water budget for local area	
Nancy Esteb	3/20 Planning Commission	Any federal funding available to improve/upgrade existing systems?	Loans, but not grants	Reply to Steve Gray 5/13/13
Kaye Dutto	3/23/13 email	Appreciates our work, thanks us for keeping them informed.	noted	n/a
Patricia McCauley	3/23/13 email	agrees with Phil Smith's 3/22/13 email, attached to her email		n/a
		County should do more on enforcement and education "before forcing this on the community"	noted	
		questions whether sewer would solve pollution problem, and thus not worth the cost	noted	
	5/21/13 email	attended BOH today and wondered why Jamestown Beach was not included in the study	Study area boundaries set at time of grant application without prejudice; would have stopped at end of Three Crabs but included Seashore Lane due to active HOA	emailed 6/6/13

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	6/18/13 BOH meeting oral comment	Finds fault with outreach: survey not distributed widely enough, mailings not always received, meetings not always in Dungeness	more than 8 opportunities for participation, half held in Dungeness; notices were mailed to every property owner 4 different times	(oral comments)
Jim McCauley	5/11/13 email	Wishes BOH meeting could be in Dungeness or Sequim instead of PA	noted (4 earlier meetings were held in neighborhood)	n/a
David Hamilton	5/10/13 email	Happy with his modern septic system in Golden Sands; not willing to switch to a public system and monthly charges.	noted	email 5/13/13
	6/18/13 BOH meeting oral comments	His OSS is inspected and works fine Supports good enforcement, not like past efforts	noted	(oral comments)
Greg Roats	5/13/13 call	Problematic lot with wetland and Golden Sands canal (undevelopable). Favors a collection system. Add to email list	noted done	(phone conversation)
Joe Cress	5/13/13 call	Add to email list	done	(phone conversation)
Astrid Harmer	5/21/13 call	Not in study area but is concerned re: PDN article that mentions a possible assessment on OSS owners. Can't write or email herself; please submit for her that she can't afford a new fee unless it is applied to her cost of annual inspection (she believes in the law and follows requirements).	noted for implementation phase (she lives in Agnew)	(phone conversation)
Gordon Gortelli	5/21/13 call	re: PDN article mentioning a possible assessment on OSS owners. Hopes this is considered for problem septic only; his annual inspection cost for Glendon biofilter is \$140.	noted for implementation phase (he lives in PA)	(phone conversation)
Will Johnson	5/21/13 call	inspects regularly, wants others to, as well. Annual fee, if any, should adjust according to compliance with inspection req's.	noted (lives IN study area at Golden Sands)	(phone conversation)
	7/11/13 email	Asking if there is testing in other parts of the watershed? Are there improvements to water quality in Dungeness area?	Currently several sites on several streams are monitored monthly for bacteria and nutrients, through March 2014 Bay shows improvement over 10-15 years	emailed reply 7/16/13
Various BOH members	5/21/13 BOH meeting discussion	[various comments; see minutes]	Five project conclusions developed for consideration at June BOH meeting	

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Hansi Hals/ JST	6/17/13 email	Acknowledges progress and BOH support of work that has led to improved water quality	noted	letter distributed to BOH on 6/18/13
		Agrees that staff recommendations are "reasonable"		
		Believes OSS are part of the water quality problem; human-derived bacteria were found at all freshwater and marine sampling stations (Battelle study) and one sediment station		
		Believes that OSS also contribute nutrient pollution; data suggests anthropogenic sources--possibly OSS in some cases		
		Urges BOH to work more closely with DCD shoreline and critical area permitting		
Bonnie Tinker	6/18/13 BOH meeting oral comments	Animosity among residents growing; did not know about the project until recently	notices went to landowners and this speaker rents	(oral comments)
		Congratulates (sarcasm) the County on having the money to put in a sewer		
Les Jones	6/18/13 BOH meeting oral comments	Very concerned about lack of enforcement, due to unsuccessful attempts in his 24-year history to get County to enforce study-area properties with blatant violations (described specific examples)	noted	(oral comments)
Various BOH members	6/18/13 BOH meeting discussion	[various comments; see minutes]	No action taken	Tabled to July meeting
Julie Smyth	6/18/13 email	Inspecting their own system but database shows "not current"	Not certified to self-inspect; needs a professional until DIY project ready	emailed reply 6/19/13
Lyn Muench	7/11/13 email	compliments "good work"		n/a
Pat and Jack Fletcher	7/12/13 email	Still strongly in favor of having a regional treatment facility in the not-too-distant future	noted	email reply 7/16
Various BOH members	7/16/13 BOH meeting discussion	[various comments; see minutes]	Majority voted to accept project conclusions as written in 7/9/13 memo	Will be noted in FS, appendix