

5-14-21

**SUBJECT: ESTATES/ CASCADIA WATER ISSUE UTC UW200979**

Attached for your review is information that Water Consumer Advocates-Dungeness Estates Steering Committee prepared from their research into issues connected with Cascadia Water System rate proposal that is set for UTC hearing, Thursday, 5-20-21. We are sending it to you now so that you can be advised of this information and allow time for us to answer any questions you may have in advance of the UTC hearing next week.

Questions or comments may be sent to Vicki Colburn [vickinapa@sbcglobal.net](mailto:vickinapa@sbcglobal.net)

The attachment is for informational purposes only. It is not our attorney's formal argument. That will be filed with the Commission Monday, 5-18-21 and will be available for the public and all interested parties review at that time.

We hope that your schedule still allows you to listen and or participate in this meeting. Your interest and attendance concerning this most important issue means a great deal to your constituents.

UTC website ([utc.gov.wa](http://utc.gov.wa)) has instructions for how to participate virtually in these meetings. Should you have any problems please contact John Cupp, UTC's Public Information Coordinator, 360-664-1113 [john.cupp@utc.wa.gov](mailto:john.cupp@utc.wa.gov) or call 360-664-1234 for assistance.

Thank you.

VICKI COLBURN

By and for: WATER CONSUMER ADVOCATES-DUNGENESS ESTATE

# WATER CONSUMER ADVOCATES-DUNGENESS ESTATES (WCADE)

WCADE'S SUMMARY DOCUMENT\*\*\*\*

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\*\*\*\*THIS IS FOR INFORMATIONAL PURPOSES ONLY AND IS INTENDED TO INFORM WCADE'S GROUP AND INTERESTED LOCAL, STATE AND FEDERAL REPRESENTATIVES OF THE RESEARCH AND INFORMATION DISCOVERED BY THE STEERING COMMITTEE TO ASSIST WCADE'S ATTORNEY IN HER PREPARATION OF OUR ARGUMENT BEFORE THE UTC.

PLEASE DO NOT USE THIS INFORMATION OR SEND ANY PART OF IT TO OTHERS WITHOUT WRITTEN PERMISSION OF THE STEERING COMMITTEE. ALL NECESSARY INFORMATION THAT IS TO BE SHARED WITH THE UTC WILL BE ATTACHED TO OUR LEGAL AGRUMENT & OPINION.

THE STEERING COMMITTEE HAS TRIED TO VERIFY AND CONFIRM ALL INFORMATION. HOWEVER, IN SOME INSTANCES WE ARE STILL WAITING FOR INFORMATION FROM BOTH THE UTC AND SYSTEM OWNER, CASCADIA. WE BELIEVE OUR ESTIMATES, WHEN USED, ALLOW US TO MAKE A REASONABLE STATEMENT ABOUT THE ADVERSE EFFECTS OF THIS PROPOSAL.

QUESTIONS OR COMMENTS CAN BE SENT TO VICKI COLBURN. [vickinapa@sbcglobal.net](mailto:vickinapa@sbcglobal.net)

## Introduction

UW200979

“Clean drinking water and sanitation are essential to the realization of all human rights” (United Nations Resolution 64/292). It is the opinion of the Estates Water customers that water should not be commoditized. Private water systems were not created to be “for profit” concerns and our water should not be allowed to be sold to the highest bidder.

Before we begin our discussion of UW200979, on behalf of the Water Consumer Advocates-Dungeness Estates, I would like to take a moment to introduce you to our community and Estates Water System.

Consumers of Estates Water are primarily made up of retired senior couples or individuals who have chosen to live here to be able to take advantage of a quality lifestyle at reasonable, affordable prices in an area that caters to retirees. Many are living on fixed incomes.

The Estates Water System is located on the Olympic Peninsula in Clallam County near the city of Sequim. The residences served by Estates Water System are a mixture of manufactured houses, more traditional stick-built houses, and coastal bluff houses that overlook the Strait of San Juan de Fuca. Some of these houses are in planned residential developments controlled by an HOA or POA. There are also several 1-acre and 2.5 and 5 acre mini-farms. The age, design, size and quality of homes within our community varies as does their value.

An interesting fact that is relevant to our community’s determination to protect our freshwater resources is the annual Sequim Irrigation Festival, now in its 126<sup>th</sup> year.

We respect and celebrate the importance of water in our local community. We have been doing so for decades. Our area has an abundant source of clean, safe water, free from the effects of landfills, arsenic, and other contaminants unlike the drinking water on Whidbey Island as has been confirmed by the EPA and Island County Health.

Our area also has seven separate irrigation districts that help direct some of the water from the Dungeness River to aid our local farming, cattle, and dairy operations. It is the management and control of our freshwater resources years ago that transformed an aired prairie into lush farmlands and flourishing residential developments. Simply put, the community at large has depended on a reliable source of water and reasonable prices for decades. The founders of our community were hard working people who valued quality at affordable prices. Our community worked together then and we still do today, to have access to basic services. Estates Water system customers have the same expectations moving forward.

Those who depend on the Estates Water System and are members of Water Consumer Advocates-Dungeness Estates, a group that was formed to educate the community members and be a resource for them to understand the complexities of this incredibly involved rate proposal, want to remind you that they have no other alternatives for water.

Records attached to Dept of Ecology reports reveal that Stocian Drilling Co, Inc. was involved with the first well in 1975. The area was known then as Blue Ribbon Farms, Division I, II & III. This area has been further developed into smaller plats over time. DOE ground water application #2-26151 was granted to Dungeness Estates Water system in the summer of 1982 at the request of Bob Matriotti and Bruce Cramer. Somewhere between 1982 and the issuance of the approved Certificate of Water Rights #G 2-26151 C in 1987, the name of the system changed to Estates Water System.

Along the way, Estates Water System was purchased by Eric and Kim Thomas. Records indicate that the Thomas' owned at least two other water systems, Monterra and Dungeness Heights. Dungeness Heights Water System was sold in 2012 UTC Docket # UW120132. The Thomas' owned and operated Estates and Monterra for over 20 years until their retirement which coincided with the sale to Cascadia.

Estates Water System is approved for 480 connections and is a non-expanding system. Currently, we are advised that there are 374 residential users, 1 commercial user, 96 ready -to- serve connections and the remaining connections provide water to 5 Acre School and Clallam County's Dungeness Recreation Area Campground and the Dungeness National Wildlife Refuge. (Estates established water service to the co- managed county/USFWS park in 1983)

Mr. Thomas' primary occupation which provided the support of his family consisting of his wife Kim and 3 children was associated with the welding industry, the water systems were side or part time endeavors. Kim was responsible for the day- to- day operations and administration/billing functions. Eric employed contract hire, Dale Metzger to help with large jobs or coverage when the family was away. Mr. Metzger remains a contract hire for Cascadia and is the only local Cascadia representative on the Peninsula.

The Thomas' built their family home off Klahhane Road and were members of the community that depended on their water system. Eric operated the water system mainly for the benefit of the community. Reviewing supporting documents for the system's tariff revision, UW180507, in 2018 financials show that he did not take a salary and made personal loans to the system when small repairs were needed. This was truly a private water system, serving the needs of the community. Eric had extremely high standards and those were applied to management of the water system. The community could always depend on the availability of safe, clean, reasonably priced water.

Based on Eric's attention to detail and performing proper maintenance, the system functioned well on the revenue that was provided for over 20 years until seeking their first- rate increase in 2018. While the original rate increase submitted for UTC consideration was an increase of 56%, (\$55,000.00) UTC rate staff reduced the approved amount to 27% or a total increase of \$26,000.00. The increased revenue was derived from a 100% increase of the ready to serve rates, from \$60.00 per year to \$120.00. This one action provided nearly ½ of the revenue requested or \$11,520.00. The remaining amount of \$14,480.00 would be paid by the residential users. **This rate increase per user amounted to approximately \$41.85 per year OR \$3.49 PER MONTH per user. The Estates Water consumer community did not contest this reasonable rate increase. The only change since 2018 is a new owner.**

As a child surviving a Japanese prison camp in the Philippines, fighting other serious health issues including a fused back and chronic heart problems, I have seen and lived through many difficulties in my 86 years. Living in retirement on a small teacher's pension and social security, after paying almost one third of my modest \$3400.00 monthly income on my long-term care policy and related health care & medical expenses, there is little left.

While working hard to be able to remain in the home I love and live independently for as long as I can, near friends and neighbors who have helped me along the way, I now face the possibility that I may have to consider other options – just because of the unexplained and unexpected water increases that may be imposed on us.

I have so enjoyed my small home with the views of the golf course and have, over the years, taken great pride in the beauty of my simple landscaping that blends into the green rolling hills of the course. On those harder days when having to use a walker to navigate around my home poses problems, I am reminded of the beauty of life and my pleasant surroundings have given me encouragement on those challenging days.

The rate proposal was rather impossible to understand. It was not like other utility increases that quote the increase as a simple percentage increase. So, I was relieved to find out that a neighbor had developed a spread sheet that would use my current water usage and show me the effects of the pending increases. After seeing the effects, shown below, my concern turned quickly into fear – How would I ever be able to afford this? How can this be right?

Annual charges from the 6 most recent bimonthly invoices (5-21-20 to 3-31-21) show that I have used and paid for current water costs of \$366.75. This is usage during spring/summer watering needs and also colder, fall/winter months when usage is much less. I have budgeted and sacrificed to afford the \$30.56 per month for water.

The first phase will increase my costs by 91% to \$701.21. Second phase 112% or \$779.33 and the third and final "forever" until the next rate increase is 145% or \$899.07. This will certainly challenge my remaining monthly funds. It will be extremely difficult but somehow I will have to find a way to afford this. I do not want to have to move at this final stage of my life. I have made cuts every where I can think of. I eat red meat now only occasionally. I do not own a computer, so I do not have internet costs. I can look to see how I might afford phase 1 increases, but the other ones will be more of a problem. My funds can stretch only so far.

I would urge the Commissioner's to fully understand the effects that their decision will have on me and others in my community that are in the same or similar conditions. We are a retirement community and have been for some time. My story and situation is not unique to me - it represents many, many others who now have this fear – do I buy food, medicine or now we have to add water to the equation?

For myself and others like me, please use caution when making your ruling. **Please do not approve these unbearable water rates. We are dependent on you to protect us and make water available to us at fair, reasonable and affordable rates.** Please know the actual effects of the rates you are approving before you quickly make a decision.

Thank you,  
Charlotte Fraizer  
Water Consumer Advocates- Dungeness Estates user #37

## WATER QUALITY AND QUANTITY

We, as consumers of Estates Water, are fully aware of the inequities described herein and which fully justify our resolve to oppose the UTC considering any further consolidation of the drinking water systems owned by Cascadia Water LLC on Whidbey Island, namely Lehman, Sea View, and Del Bay, with those owned by Cascadia Water LLC in Clallam County, namely Estates and Monterra. Estates Water users disagree with any new rate increase as a result of the planned consolidation of these disparate water systems. Such a consolidation would immediately, and in perpetuity financially harm Estates water system consumers. This is unfair, unjust, and unreasonable!

Cascadia has submitted figures of over \$700,000.00 for repairs, upgrades and or improvements for the rate increase proposal, with almost 100% of those expenses for the previous Lehman Enterprises systems on Whidbey Island. We have yet to be able to locate any reference to, consideration of or actual costs stated by Cascadia that may have had or will have an impact on Whidbey's water systems due to environmental conditions.

It is a well-established fact that Whidbey Island has had serious problems with both water quantity and quality for decades. Central Whidbey is in the Olympic rain shadow with the average annual precipitation of only 20-24 inches, hardly sufficient to refill ground water aquifers to meet the increasing demand. Water scarcity drives higher prices. Consumers of the Whidbey Island water system should pay for these additional water costs.

A study by the Island County Ground Water Quality Assessment and Monitoring Program that was conducted from September 1984 to May 1986. It was the first such report on the conditions that are affecting the drinking water on Whidbey Island, included in this report was damage observed from seven landfills on the Island. The areas of interest in this matter include the Naval Air Station (NAS), Oak Harbor, Coupeville, Freeland and Langley.

The report stated that ground water quality at several of the sites noted in the Island Ground Water Quality Assessment and Monitoring Program report are significantly degraded, repeatedly mentioning issues with the Freeland area: "Waste disposal operations at Freeland landfills have significantly impacted site ground water." Some of the Lehman Wells are in this general area.

Island County Public Health has produced a map that shows the locations of the various landfills on Whidbey Island. A copy is included in this document for your reference. In addition to the contamination from the seven landfills on Whidbey Island, there are other sources for drinking water contamination.

Included are spreadsheets that break down contaminants found in Cascadia's wells on Whidbey Island and wells located in Clallam County. This information was reported to the Environmental Working Group (EWG) by WA DOH and US EPA. EPA information comes from EPA Enforcement and Compliance History Online data base (ECHO). This report provides information from trusted sources that there are water quality concerns with specific wells on Whidbey Island. Cascadia's rate proposal advised that T.E.L. #10, a Lehman water system well, needed a new well due to nitrate issues. Cascadia's information seems to confirm the old well was declining in productivity and or had problems due to contamination by nitrates. Thus, a new well was required.

There is significant difference between the geography, fresh water sources and groundwater aquifers in Clallam County and those of Island County on Whidbey Island. On the DOH arsenic map, the black dots show a level of contamination over 10 ppb while the red dots show the more serious areas of contamination, with levels over 50ppb. You will note that there are so many dots, black and red, that you cannot see the outline of Whidbey Island. There is only one black dot in Clallam County. This contaminated site is located on the west side of the Olympic Mountains near Forks which is about 73 miles from the Estates and Monterra wells on the east side of the Olympics. It is safe to say that the Estates and Monterra wells are not affected from this contamination. A map from WA DOH that shows arsenic contamination around Washington State is included in this document for your reference.

The drinking water problems on Whidbey Island that have yet to be fully investigated or documented are those from Perfluoroalkyls Substances (PFAS or PFOA) contamination. PFOS/PFOA are all contaminants from the same basic chemical group. Contamination goes back decades resulting from many sources, the primary source being NAS operations. Ault Field and nine other areas of concern on Whidbey Island were listed as a Superfund Clean Up Site in 1997.

Additional damage from ground water contamination was identified in Coupeville. Naval operations used an airfield located directly above a major aquifer recharge area for that part of the Island. Again, PFAS contamination is suspected. When the Navy was forced to test the area from November 2016 through July 2019, their report showed egregious contamination.

In the city of Oak Harbor, population of 23,089 in 2019, a solution for purifying the contaminated groundwater had not yet been resolved. The US Navy, charged with the responsibility to supply Oak Harbor residents with uncontaminated drinking water has introduced a "fix". Purchase water from the City of Anacortes. The drinking water in Anacortes is provided by the Anacortes water treatment plant. Situated on Fidalgo Island. Anacortes, population of 17,000 in 2019 is also challenged with the quality and quantity of groundwater. The city's sole water source is the Skagit River. Water from the river is piped to the Anacortes water treatment plant. The Anacortes water treatment plant uses disinfection, coagulation and filtration to treat river water. It is then pumped via large water lines that run under the Deception Pass Bridge to the City of Oak Harbor, where the water undergoes further treatment. A booster pump provides water to all Oak Harbor city residents and the nearby Naval operations facilities ([www.military.com/daily-news](http://www.military.com/daily-news)).

These Whidbey Island water issues are not found anywhere in Clallam County, more specifically in the Estates and Monterra water systems. Water consumers in Clallam County should not be forced to subsidize the escalating costs of drinking water for those who choose to live on Whidbey Island.

## Cascadia Rate Proposal – DRAFT v2

In late 2020 during the COVID-19 crisis, users of the Cascadia Water System in Dungeness Valley received an “IMPORTANT NOTICE” letter from Cascadia Water (letter undated) notifying them that they had filed for approval by the Utilities and Transportation Commission (UTC) a three-phase water rate increase over the course of a year’s time, effective April 1, 2020. Recipients of this letter were baffled! The timing, apparent urgency and explanation of this proposed astronomical rate increase was vague and lacked specifics. Further, it was impossible to understand exactly how much an individual water consumer would be paying for their drinking water. Several affected individuals launched an investigation to learn why Cascadia proposed such an exorbitant rate increase. Ultimately, as more concerned Cascadia Water consumers became involved, they organized as “Water Consumer Advocates – Dungeness Estates. Recently, our group has retained a lawyer to protect our rights, and to get comprehensible answers to our questions, including the following:

- Why are we getting another rate increase? We just had a rate increase two years ago; the only thing that has changed is the system owner.
- Can Cascadia clearly explain to us how these incredibly high rates are calculated?
- How will consolidating disparate water systems with single rate tariffs, specifically Island County and Clallam County benefit Estates water users?

These are some of the questions that Estates Water System users have been asking since Cascadia’s rate proposal was received right before Christmas 2020 during the worst pandemic in world history.

The amended notice letter (also undated) that Cascadia mailed to Estates users shortly after mailing the “IMPORTANT NOTICE” letter, correcting the meter size from 3/4” to 5/8” effectively lowering the rates did not bode well for Cascadia’s reasoning for their original excessive rate increase proposal as shown in the table below:

<b>Phase</b>	<b>Effective Date</b>	<b>Percent Incremental Increase</b>
1	April 1, 2021	23.1%
2	October 1, 2021	18.8%
3	April 1, 2022	15.8%

Further exacerbating Cascadia’s complicated rate increase proposal, their amended notice letter included three tables representing the three phases of the rate increases in dollars, using four base rates that increase according to meter size, and the Avg. Monthly Bill that increases according to 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Block water usage (per 100 cubic ft.). Although these tables may more accurately represent Cascadia’s actual proposed increase in water rates, it is almost impossible for the average user to understand how much more they will have to pay for their water use. As an aid to Estate water users, an astute member of our Water Consumer Advocates – Dungeness Estates group developed a spreadsheet with formulas, then input the water use of members who voluntarily provided past Cascadia water bills so that they could see the projected cost increase of their water use.



Given the correction by Cascadia, and their presentation of overly complex rate tables, a reasonable person might question both the methodology and the accuracy. Was this in the best interest of the Estates user?

Our question to UTC seeking comment about possible price gouging during a stated emergency received little action. The UTC stated that they were not aware of any mandate. Does it take a mandate to realize that rate increases averaging 100 to 250% are wrong? Governor Inslee had a bill (5191) before the legislature restricting price increases to 15% for emergency supplies, water per DOH being an essential emergency item. Clearly, this rate proposal was not in keeping with the Governor's expectations. Washingtonians are still, today, under Governor Inslee's emergency order, however, we have not heard any official at the UTC or DOH question the percentage increases in this proposal from that perspective. Why?

A question we submitted numerous times to the UTC asked them to explain the rationale for consolidation and single rate tariffs was met with similar responses: "This is how we have been doing this for decades." The UTC's initial response was not necessarily accurate. Estates' previous owner, Eric Thomas, owned three separate systems, none of which were consolidated or found in a single rate tariff. So, we kept asking.

In an email from the UTC on 4-19-21, they clarified their response to consolidation and single rate tariffs: "Single tariff pricing is not a requirement, but it is the UTC's typical approach from a rate setting policy perspective." After 4 months of asking we got an answer. The email went on to say: "In at least one instance like this, where multiple systems are purchased by a single company, the commission has taken a phased in approach where one or multiple systems is left apart from the rest of the systems in order to limit rate shock." The Estates users would tell you that phasing in these rates will do nothing to limit rate shock, especially if the Estates water system is consolidated with the Whidbey Island's water system.

We were also trying to understand the UTC's insistence at consolidation. UTC states that rate cases are viewed case by case. If that is so, why was the UTC simply applying past policies that they have used for decades?

Washington State's new approach to governmental operations called One Washington\* is now underway according to their three-phase approach Modernization Roadmap\*\*. With the expectation that changes are on the way, the UTC can take the lead by realizing that this proposal requires a new and possibly different approach that is more in keeping with the changing environment that is currently afoot when private water systems are purchased by for profit corporations. We would hope that the UTC will embrace these changes and implement new, creative policies in how governmental agencies perform their duties.

\* The One Washington program is a multiyear effort and is aligned with the state's overarching technology goals. The program will touch all state agencies including institutions of higher education, the vendor community and many Washingtonians.

\*\* *One Washington Scope, Modernization Roadmap*:

[https://ofm.wa.gov/sites/default/files/public/onewa/OneWa\\_Modernization\\_Roadmap.pdf](https://ofm.wa.gov/sites/default/files/public/onewa/OneWa_Modernization_Roadmap.pdf)

To quote directly from UTC's 2021-2023 report: "As technology changes the way consumers interact with regulated companies, it's important that the Commission adapts rules for efficiency, security and to reduce the regulatory burden, all while ensuring consumer protection remains in place." Estates water users are encouraged by the Commission's realization that policies need to adapt moving forward.

Another UTC statement found elsewhere in the same report: "As industries in Washington face technological and market advances as well as changing customer expectations, the Commission will continue to adapt its regulatory models to industries evolving regulatory needs." We believe that this proposal is the perfect case for the UTC to embrace their statement and implement a reasonable rate structure.

In order to show good faith and a willingness to compromise, and so that the time spent by the UTC's rate staff time is properly recognized, the Water Consumer Advocates – Dungeness Estates would suggest that a 27% water rate increase (approximately \$40.00 per year or \$3.33 per month), like the one in 2018, Docket # UW180507, would be appropriate and acceptable by Estates water users. We would expect that the 1<sup>st</sup> rate block to remain 0-1000 cu ft.

Copies of graphs showing the current rates and the effects of the three phased in rate increases on 50 random Estates users follow. It is apparent to all that these astronomical increases are not fair, just or reasonable.

**WATER CONSUMER ADVOCATES-DNGENESS ESTATES – SUMMARY DOCUMENT**

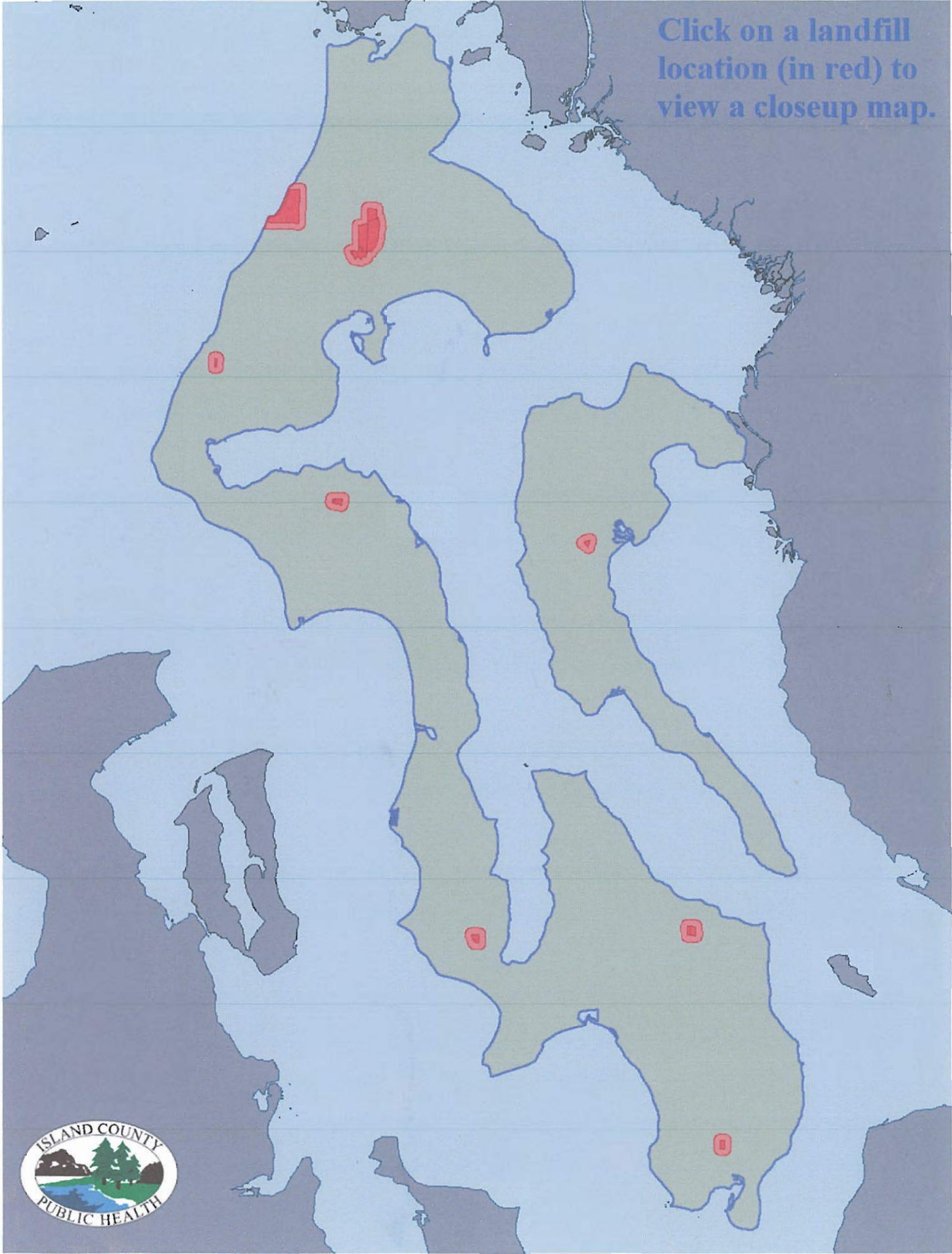
APPENDIX

UW200979

5-20-2021

1. ISLAND COUNTY PUBLIC HEALTH LANDFILL MAP
2. WATER QUALITY SPREAD SHEETS 6 pages
3. WASHINGTON DEPT. OF HEALTH ARSENIC MAP
4. DEPT OF HEALTH ASSET MANAGEMENT LIST – ESTATES#08166
5. CENSUS DEMOGRAPHICS – SEQUIM, WA & WHIDBEY ISLAND, WA
6. Water Consumer Advocates-Dungeness Estates Member's list
7. DUNGENESS GREENS LETTER OF SUPPORT

Click on a landfill location (in red) to view a closeup map.



**Water Quality Report** 4/5/2021

Water quality report for Cascadia-owned systems, and general Whidbey Island information

**Information on water tests performed by the utility  
Provided to Environmental Working Group by WA DOH as well as US EPA**

ewg.org/tapwater

Data available 2012-2017

Source: groundwater

**CLALLAM COUNTY**

**ESTATES population: Ridgeview Dr, Sequim (EPA REGION 10)**

FRS ID#	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
110013065798	2.2	0.303	0.14ppb	10 ppb				NO	
Radium (-226&-228)	30	1.50 pCi/L	0.05pCi/L	5 pCi/L	0.11 pCi/L	0.47 pCi/L		NO	

Source: Nitrate - chemical fertilizers agricultural / urban runoff ; septic tanks (surrounding areas farm land - & area served primarily by septic tanks)  
Radium: can occur naturally in ground water, oil & gas extraction activities  
Specific lab ID's; dates and results available

\*\*2008-2010 5 various MR violations; 2018 violation # 1844485 lead/copper rule type: MR (MR is a monitoring & reporting violation not substance level violation)

**MONTERA population: Home Ln, Port Angeles WA (EPA REGION: 10)**

FRS ID.#	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
110013017029	500	2.00ppb	0.004ppb	10 ppb	1.84 ppb	0.682 ppb		NO	
Radium (-226&-228)	18	0.90 pCi/L	0.05 pCi/L	5 pCi/L	0.11 pCi/L	0.47 pCi/L		NO	
Fluoride	trace								
Manganese	trace								
Nitrate	trace						2014	YES**	1433454
Nitrate & Nitrite	trace								

Source: Arsenic common contaminant in drinking water

Radium : can occur naturally in ground water

\*\*violation noted is a consumer confidence rule/monitoring & reporting violation not a specific substance level violation

**ISLAND COUNTY**

**BEACHCOMBER, population 286 (address not noted on EPA report) (EPA Region: 10)**  
 FRS ID#110012824033; EPARegion: 10

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Arsenic	750	3.00ppb	0.004 ppb	10 ppb	1.84ppb	0.682ppb		NO	
Nitrate	4	0.554 ppm	0.14 ppm	10 ppm	0.889ppm	0.937 ppm		NO	
Nitrate & Nitrite	3.2	0.450 ppm	0.14 ppm	10 ppm	0.779ppm	0.891 ppm		NO	
Barium	trace								
Chromium	trace								
Manganese	trace								
	trace								

**CAL WATERWORKS, E. Harbor Rd, Freeland, population 235 (EPA Region: 10)**

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Nitrate	26	3.70 ppm	0.14 ppm	10 ppm	0.889ppm	0.937 ppm		NO	

**TEL #1, population 185, Inglewood Dr, Langley**  
 FRS ID #110012814284

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Arsenic	1125	4.50 ppb	0.004ppb	10 ppb	1.84ppb	0.682ppb	2014-2016	YES	16591381005
Nitrate	trace								

**TEL #3, population 70, Gold Finch Rd & Cultus Bay Rd, Clinton (EPA Region: 10)**  
 FRS #110012988838

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Nitrate	3.6	0.508	0.14 ppm	10 ppm	0.889ppm	0.937 ppm		NO	



**Sampling from Surrounding Areas - These are NOT Owned by Cascadia**

Source: EWG supported by WA DOH and US EPA (same as other reports)

BABY ISLAND, Freeland										
	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #	
Arsenic	1400	5.60 ppb	0.004 ppb	10 ppb			2016	YES	1649999	
Bromodichloromethane	72	4.33 ppb	0.006 ppb	none						
Bromoform	11	5.63 ppb	0.5 ppb	none						
Chloroform	3.1	1.23 ppb	0.4 ppb	none						
Dibromochloromethane	83	8.30 ppb	0.1 ppb	none						
Nitrate	32	4.43 ppm	0.14 ppm	10 ppm						
Nitrate & Nitrite	25	3.57 ppm	0.14 ppm	10 ppm						
Radium, (-226 & -228)	4.6	0.23 pCi/L	0.05 pCi/L	5 pCi/L						
TTL trihalomethanes	130	19.5 ppb	0.15 ppb	80 ppb						
Barium	trace									
Chromium	trace									
Fluoride	trace									
Manganese	trace									

BAYVEW BEACH										
	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #	
Arsenic	1113	4.45 ppb	0.004 ppb	10 ppb						
Bromochloroacetic acid	60	1.20 ppb	0.02 ppb	none						
bromodichloromethane	64	3.81 ppb	0.06 ppb	none						
bromoform	6.4	3.18 ppb	0.5 ppb	none						
Chloroform	3.8	1.51 ppb	0.4 ppb	none						
Dibromoacetic acid	49	1.96 ppb	0.04 ppb	none						
dibromochloroethane	63	6.27 ppb	0.1 ppb	none						
Haloacetic acids (HAA5)	26	2.56 ppb	0.1 ppb	60 ppb						
Nitrate	4.9	0.690 ppm	0.14 ppm	10 ppm						
radium	16	0.80 pCi/L	0.05 pCi/L	5 pCi/L						
ttl trihalomethanes	127	19.0 ppb	0.15 ppb	80 ppb						
trichloroacetic acid	2.8	0.280 ppb	0.1 ppb	none						
	2.8	0.280 ppb	0.1 ppb	none						



CROCKET LAKE, Coupville, WA (EPA Region: 10)

FRS # 110013051222

2016-2019

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Arsenic	275	1.10 ppb	.004 ppb	10 ppb					
Manganese	4.6	460.0 ppb	100 ppb	none					
Nitrate	5.8	0.813 ppm	0.14 ppm	10 ppm					
Nitrate & nitrite	5.1	0.710 ppm	0.14 ppm	10 ppm					
Radium	16	0.80 pCi/L	0.05 pCi/L	5 pCi/L					
Fluoridde	trace								

HARBOR HILLS, E Antelope Dr, Freeland (EPA Region: 10)

FRS ID# 110013035517

12 Contaminates	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
							2016	YES	2015180
							2016	YES	2015181
							2015	YES	2020935
							2015	YES	2020934
							2014	YES	1710649
							2014	YES	1710650

Violations: 2014-2017 stage 2 Disinfectants & By products

EASTGATE, population 76, Lange St, Oak Harbor

	X over EWG	Water System	EWG Guideline	Legal Limit	State Average	National Average	Yr Violation	EPA Violation	Violation #
Arsenic	13.7ppb			10ppb			2018	YES	2307080

\*\*\* MAXIMUM CONTAMINANT LEVEL VIOLATION. LEGAL LIMIT 10PPB -- test results 13.7ppb

ADMIRALS COVE, population 820, Rickover Dr, Coupeville

Synthetic Organic Chemicals	Chemical	Yr Violation	EPA Violation	Violation #
	alidicrab	2008-2010	YES	10694892047
	carbofuran			10694892046
	aldicarb sulfone			10694892044
	aldicarb sulfoxide			1069482043
	oxamyl			10694892036

**NAVAL AIR STATION, Whidbey Island**

Ault Field listed as a Superfund Site with 9 areas of concern

Extract of the report shows Arsenic level 1,333 times over ewg's guideline plus 8 other chemicals well over EWG's limits.

The EPA enforcement and compliance history report is more than 10 pages This is too much information to accurately show here Reports appear to be somewhat redacted and marked for national security.

Other articles seem to point to the Navy's delay of action

Those also reporting to the EPA were Superfund NPL & Haz. Waste Treatment, Storage & Disposal Facilities (TSDF)

**Perfluoroalkyls Substances (PFAS/PFOA/PFOS)**

Found in firefighting foam used in Naval training operations at Oak Harbor and Coupeville

**Contaminated by Naval Operations**

Coupeville OLF airfield located directly above MAIN aquifer recharge area for that part of the island

Navy forced to test water station Nov 2016 thru 7-2019 - found nothing short of outrageous

Contamination goes back decades (Naval access study 1998)





## CENSUS INFORMATION – DEMOGRAPHICS

Sequim, WA vs Whidbey Island, WA

UW200979

	SEQUIM, WA	WHIDBEY ISLAND,WA
<b>AGE:</b>		
<b>+65</b>	<b>36.6%</b>	<b>25.25%</b>
<b>MEDIAN HOUSEHOLD INCOME:</b>	<b>\$40,155.00</b>	<b>\$68,604.00</b>
+ difference between Sequim & Whidbey		(+\$28,449.00)
<b>MEDIAN PROPERTY VALUE:</b>	<b>\$238,500.00</b>	<b>\$358,000.00</b>
+difference between Sequim & Whidbey		(+119,500.00)

Source: US CENSUS 2019

# WATER CONSUMER ADVOCATES-DUNGENES ESTATES UW200979

## KLAAHANE ROAD

George & Marcia Gamble  
Erik & Kristi Langenbacher  
Lenore Klick  
Mary Treider  
Frank & Denise Bakke  
Charles & Cheryl Bishop  
Allan & Pam Balla  
David Johnson & Sandy Bertrand  
Steve Colleen Weed  
Fernando & Annie Fernandez  
K. Walker & C. Moeller  
Buck & Vicki Colburn  
Adam & Heidi Shantz  
Bruce & Kristi Pease  
Bob Fabry  
Jim Fournell

## KATT COURT

Orlando & Lina Roche  
Steve & Bette Zettel  
Bill & Cat Eberhart  
Kathie Evans

## LONE EAGLE

Martin & Andrea Hana

## NICOLE

Dallas Jones  
Bobbie Garza & Steve Carpenter  
Terri & Ron Jones

## BON JON VIEW WAY

Diana Whitaker  
Joyce Martin  
Bill & Carolyn Fraser  
Chris Cornell  
Jim Reker

## RIGDEVIEW

Randall & Diane Wingett  
Kurt & Lori Anderson  
Shelby DePas  
Jill Butterfiled  
Carol Bergland

## BUDS WAY

Peter & Terri DiMartino  
Dora Stovall  
Kristen Mooney  
Norvin Knight  
Fred Kodiak

## STEVE PLACE

Dale & Barbara Johannessohn  
Jayne Johnson

## KITCHEN DICK

Jack & Virginia Moore

## BUCKHORN

Joel Cziok  
Renee Coffman  
James Carroll & Yesenia T. Fernandez  
Kim Flanigan  
Ron & Stephanie Figueroa

## SECLUDED WAY

Dan & Donna McSherry  
Sandy Jacobsen  
John & Nika Greenleaf  
Nick & Jessica Simpson  
Norris Hart  
Vic & Linda Entrikin  
Jim & Chris Larson

## DUNGENESS GREENS

Al & Christy Bierlink  
Pat Charters  
Kelly Steward  
Burt Jones & Maurine Shimlock  
Joan Fargo & Dour Dammarell  
Doug Blane  
Don & Carolyn Bhor  
Pat Whitaker  
Arni & Elaine Fredrickson  
Diane & Joe Clementi  
Dave & Linda Grilley  
Robert & Darla Shaw  
Richard & Garnett Kelly  
Tom & Deb Cox

## **WATER CONSUMER ADVOCATES-DUNGENESS ESTATES**

### **DUNGENESS GREENS** (CONTINUED)

Clinton & Pam Cummis

Robert Nute

Wayne Stephens

Betty Gordon & Michel Moss

Charles Schultz

Teressa Wilson

Charlotte Fraizer

Dough & Shelia Fontaine

### **GREYWOLF AREA**

Rick Smith

Gunar Clem

Alice Susong

Mark & Eileen Long

Jim & Natasha Merkuloff Nichols

Susan Kantowitz

Pat Schoen

Jeanne Martin

Joseph & Wimberly Sharkey

Gordon & Krys Gordon

John Cuny

Jean Heessels-Petit

### **AIRPARK ROAD**

Mary Lowry

Nick Elliott

Sally Kincaid

Charles & Lavada Schultz

Amber Diehl & Scot Mills

### **W. ROBERT PLACE**

Grover Grady

May 2, 2021

Water Consumer Advocates-Dungeness-Estates.

c/o Vicki Colburn

Dear Water Consumer Advocates-Dungeness-Estates,

On behalf of the 31 members of the Dungeness Greens Owners Association, we oppose UW200979 rate increase and request that the commissioners listen to the requests of the users and ensure that a reasonable, fair and just rate be established.

Cascadia Water is requesting a rate hike and new tariff for our and other communities' water bills exorbitant amounts to cover their significant costs to fix other communities water systems. We are hoping your efforts will convey this grievance to the commissioners. Know that we support you.

Sincerely,

Dungeness Greens Owners Association Board.