DATE: December 29, 2016

TO: Clean Water Services Advisory Commission (CWAC) Members and Interested Parties

FROM: Mark Jockers, Government & Public Affairs Manager

SUBJECT: REMINDER OF AND INFORMATION FOR JANUARY 11, 2017

This is a reminder of the CWAC meeting scheduled for **Wednesday, January 11, 2017** at Clean Water Services' main office, 2550 SW Hillsboro Highway. The CWAC meeting packet will be mailed to Commission members by January 2. The Agenda will also be posted to Clean Water Services' website by January 2 at CWAC section of our website.

Please call or send an email to Mark Jockers (JockersM@cleanwaterservices.org); 503 681-4450) if you are unable to attend so food is not ordered for you.

Enclosures in this packet include:

- January 11, 2017 Agenda
- November 9, 2016 meeting notes

Clean Water Services Advisory Commission
January 11, 2017

AGENDA

6:30 p.m. **Welcome & Introductions**

6:40 p.m. **Review/Approval of Meeting Notes of November 9, 2016**

6:45 p.m. **Design & Construction Standards Update**

Staff has been working with stakeholders over the last six months on Phase I of the Design & Construction Standards update. Staff will review draft language for Chapter 4 (water quality standards) and Chapter 6 (erosion control). Draft language for Chapters 4 and 6 will be sent electronically to the CWAC and stakeholders prior to the meeting.

- Damon Reische, Development Services Division Manager

Requested action: Review and provide input draft language and stakeholder engagement

7:30 p.m. **Leaf Program**

Clean Water Services has operated a fall leaf program to help address localized flooding problems in urban unincorporated Washington County for more than 20 years. Staff presented an overview of the program's history and operations to CWAC in April 2016. Staff is considering a re-examination of the program's purpose and scope and is seeking CWAC's input.

- Ryan Sandhu, Field Operations Division Manager

Requested action: Review and provide input

8:10 p.m. **Announcements**

8:15 p.m. **Adjourn**

Next Meeting: February 8, 2017

Clean Water Services
Clean Water Advisory Commission
Meeting Notes

November 9, 2016

Attendance

The meeting was attended by Commission Vice Chair Mike McKillip (District 3-Rogers) and Commission members Molly Brown (District 2-Malinowski), Lori Hennings (Environmental), John Jackson (Agriculture), Erin Poor (District 1-Schouten), Matt Wellner (Builder/Developer), and Kevin Wolfe (Business), and Clean Water Services District General Manager Bill Gaffi.

Commission Chair Tony Weller (Builder/Developer) and Commission members Erin Holmes (Environmental), Art Larrance (At-Large-Duyck), Judy Olsen (Agriculture), David Waffle (Cities), Stu Peterson (Business) and Richard Vial (District 4-Terry) were absent.

Attendees from Clean Water Services included Elle Allen (Development Services Supervisor), Jessica Bucciarelli (Senior Public Affairs Specialist) Nora Curtis (Conveyance Department Director), Laurie Bunce (Engineering Tech 3), Mark Jockers (Government and Public Affairs Manager), Jerry Linder (General Counsel), and Damon Reische (Development Services Division Manager).

The meeting was also attended by James Adkins (Home Builders Association of Metropolitan Portland), Nacia Bonilla (Metropolitan Land Group), Brian Haslip (Vice President, Oregon Brew Crew), and Ruby Buchholtz (River Advocacy Manager, Tualatin Riverkeepers).

1. Call to Order

The meeting was called to order by Mr. McKillip at 6:33 PM. The meeting was held in the conference room of the Clean Water Services Administration Building.

2. New Members

Mr. Jockers welcomed Matt Wellner, recently appointed to the Commission as a Builder/Developer representative. Mr. Jockers also noted that Stu Peterson has been appointed as a Business representative.

3. Review of Meeting Notes from August 10, 2016

There were no comments regarding the Meeting Notes from August 10, 2016.

4. High Purity Water Project/Pure Water Brew Report

Mr. Jockers outlined the history and success of the Pure Water Brew competition in building national/international awareness and changing the conversation about water re-

use (videos available at www.purewaterbrew.org) The idea of water re-use faces challenges in technology, public perception, and regulations. The Pure Water Brew beer-making competition was suggested by Commission member Art Larrance as a way to bring public attention to the concept that all water is recycled and that purified water can be safe—even desirable—for consumption. Highly purified water from a Clean Water Services demonstration project was provided to competition participants. The competition was coordinated by Oregon Brew Crew. Several corporate sponsors provided supplies, awards, and other support.

Mr. Haslip said that Oregon Brew Crew members initially saw the competition as a novelty, but participating brewers quickly realized the purified water was a perfect "blank slate" from which to duplicate any desired style of beer. The competition has helped to reduce the stigma attached to water re-use and get people thinking seriously about it. As proof, Mr. Haslip shared small samples of three beers from this year's competition. .

Mr. Jockers said that the Pure Water Brew competition is indeed helping change the conversation about water re-use. The knowledge and conversation from Oregon Brew Crew members about the quality of the water necessary for brewing has helped the public see water re-use in a different light. The competition and beer samples have been showcased at national wastewater industry events and other municipalities are borrowing the concept to educate their communities about water re-use. The idea of making beer with reclaimed water generated more than 500 stories in a variety of international media. While most did carry tongue-in-cheek headlines, the tone of the stories was generally serious: more than 80% mentioned water purity or purified water and 50% mentioned drinkability or water quality. Further acknowledging the advances in technology and reflecting the growing public interest in re-use, DEQ (Oregon Department of Environmental Quality) is beginning to consider broader updates to its water re-use regulations after hearing support from both agricultural and environmental groups at a recent EQC (Environmental Quality Commission) meeting.

Ms. Hennings asked what is "beyond beer"—is Clean Water Services looking to increase capacity for producing the highly purified water, and/or using it for other purposes? Mr. Gaffi responded that Clean Water Services is looking at how reuse fits into the future. If for some reason water supply expansion efforts are delayed or cannot proceed, there may be need to re-use more water; perhaps not as drinking water but for irrigating food crops. It's good to know that option is ready if needed.

5. Design & Construction Standards Update

Mr. Reische reviewed progress ***(presentation attached)*** on the Design and Construction Standards (*D&C*) update, which was explained in detail during the August Commission meeting. Stormwater-related requirements in the NPDES (*National Pollution Discharge Elimination System*) permit issued this spring are the impetus for the three major components of the update:

1) setting 1,000 SF (*square feet*) of development/redevelopment activity as the threshold

which would trigger requirements for stormwater runoff water quality treatment,

2) placing highest priority on LIDA (*low impact development approaches*) for addressing stormwater runoff water quality treatment, and

3) mitigating hydromodification (*changes in the way water would naturally move in/through a site to a stream, due to creation of impervious area, removal of vegetation, and other development-related activities*) in development and redevelopment projects.

The D&C update will be completed in two phases. Two key topics in Phase I are the 1,000 SF treatment threshold and LIDA prioritization. The third key topic is revising the redevelopment standard for treatment threshold, as the current standard places a disproportionate burden on small projects on large sites. Significant work on redevelopment revisions was done in a series of meetings with stakeholders in 2012-13 before the process was put on hold when the NPDES permit approval was delayed. Mr. Reische and his staff plan to complete Phase I by the April, 2017 deadline in the permit.

Mr. Reische outlined the various other topics considered for inclusion and reviewed the input from Phase I meetings held so far with several groups of stakeholders. He noted that the plan was to have a meeting devoted primarily to each of the three key topics, but in practice each meeting included some discussion of all three issues as they are very interrelated. He added that some outreach has been done to encourage more participation from neighborhood groups and to engage with Tualatin Riverkeepers, an important environmental voice which was not represented at the meetings due to staffing changes. Mr. Reische also acknowledged the value of participation by Clean Water Services partner cities which, as co-implementers of parts of the NPDES permit, in combination process at least as many development permit applications as Clean Water Services does directly.

Mr. Reische said meeting participants expressed a desire for clear, objective standards and easy pathways for obtaining permits. Clean Water Services hopes to accomplish that without being so prescriptive that there is no flexibility for unique circumstances and innovative approaches. Staff members have refined some of the stakeholder feedback into proposed language and concepts for the 1,000 SF treatment threshold section of the D&C update. That material was just posted on the Clean Water Services website and staff would like comments and suggestions by November 14. Each section of the update will be released as it is drafted, as advised by Commission members during the August meeting. Depending on feedback, there may be follow-up meetings which could involve the Commission.

Mr. Reische hopes to have the Phase I draft available in January for informal review so any issues can be resolved before the final draft is presented for public hearing and comment period in February/March. He asked Commission members to share their comments as soon as possible and to encourage others to do the same. Existing D&C and proposed updates can be reviewed at www.cleanwaterservices.org/dncupdate, and

comments and questions can be emailed to DnCupdate@cleanwaterservices.org.

Phase II of the D&C update will focus on hydromodification. The NPDES permit deadline for implementing hydromodification standards is April, 2019. The permit specifies several benchmarks or checkpoints between now and then. Commission members can expect information and discussion on hydromodification aspects of the D&C update shortly after Phase I is completed next spring.

Mr. Reische explained that the definition of hydromodification only considers the effect of new development on an area as it is now; it does not account for surrounding development which may have already unnaturally affected the "natural state" of the area to be developed. In addressing hydromodification, Clean Water Services is looking beyond individual development sites to the ecological health of the overall stream system. Decades of development and agricultural activities have created conditions which allow stormwater runoff to reach a stream in minutes instead of the months it might naturally take to migrate through the soil. As a result, many streams are left with little or no water during summer months. Improving stream resiliency may include conventional approaches such as retention ponds, but will also include restoration work.

Clean Water Services has already implemented some innovative practices related to hydromodification, and has undertaken two pilot projects—one on Bethany Creek and another on North Abbey Creek—to help demonstrate the value of a broader, stream system-wide approach. Commission members will likely be able to visit those project sites next spring or summer as Phase II begins.

See Appendix for questions and comments regarding the Design & Construction Standards Update.

6. Announcements

Mr. Jockers will provide an orientation for Mr. Wellner and Mr. Peterson on Wednesday, November 16, 8:30-10:30 AM at the Durham Advanced Wastewater Treatment Facility. Others interested are also invited to attend.

The past several weeks have been busy for Clean Water Services staff, with a near-record-breaking start to the wet winter season combined with development activity as high as it has ever been in the past 25 years.

Clean Water Services is close to an agreement with a regional retailer which would place Clean Water GROW in more than 130 stores throughout four states.

The next Commission meeting is scheduled for December 14 but will more likely be held at the following scheduled time of January 11, 2017.

7. Adjournment

The meeting was adjourned by Mr. McKillip at 8:13 PM.

(Meeting notes prepared by Sue Baumgartner)

Appendix

Clean Water Services Advisory Commission Meeting Notes
November 9, 2016

Questions and comments regarding Design & Construction Standards Update:

1. When you say that the 1,000 SF treatment threshold changes will affect single family and duplex construction, do you mean parcels that are not part of a subdivision?
    a. Yes, the changes would apply to an existing lot of record already platted in a subdivision, presumably before water quality standards were in place. Treatment for lots in newer subdivisions would have already been addressed in the creation of the subdivision.

2. Could fee-in-lieu possibilities (for treatment threshold and LIDA) be expanded if the fee were increased?
    a. We are evaluating the fee-in-lieu structure and thinking about how that fits into LIDA prioritization, so there is probably an opportunity there. The permit doesn't prohibit increasing fees, but it does talk about removing barriers (in other codes) to implementing green infrastructure. The permit requires that LIDA be considered first in the hierarchy of alternatives but it doesn't preclude alternatives such as fee-in-lieu.

3. With the 3:1 ratio in the simplified proportional treatment option (for redevelopment treatment threshold), is the first 1,000 SF "free"—if your disturbed area is 2,000 SF, you would only apply the 3:1 treatment ratio to the second 1,000 SF—or would it apply to the entire area?
    a. It is based on the area being modified. If you modify 1,000 SF, you trigger the 3:1 threshold and would need to treat 3,000 SF.
    b. Feedback from stakeholder meetings was that simple ratios are preferred, without reference to lot size. This is just one of the possible ratio-based approaches and not necessarily what will end up in the final draft of the D&Cs update.

4. Can you input these treatment ratios into an equation that calculates the benefit to the watershed, and then increase or decrease ratios for different kinds of development, based on the amount of impervious area associated with a type of development and how much of that type of development is done throughout the watershed?
    a. That is an interesting idea that hasn't come up before; it certainly could be considered.

5. Are fee-in-lieu payments used to support treatment functions elsewhere?
    a. Yes, those fees go to projects for retrofitting existing untreated impervious areas, residential and otherwise. Commercial partners in the Clean Water Heroes program have helped retrofit schools in particular.

6. Are there possibilities for voluntary fee-in-lieu-like partnerships whereby a landowner with a treatment requirement that isn't feasible for their site could instead pay to retrofit a specific neighborhood site (rather than just pay into a general fund)?
    a. Yes, Clean Water Services has done some projects like that with LIDA.

7. What if a homeowner builds an addition that triggers the 1,000 SF threshold and installs an appropriate treatment facility, but a subsequent owner disregards or even destroys it?
    a. That is a problem in LIDA subdivisions under the current standard. We are trying to record maintenance agreements for those lots as they are created, and could work toward something similar for individual properties outside a subdivision.
    b. It can be hard for a home buyer to be aware of a maintenance agreement in the stack of papers that must be signed. We do have a list of all our LIDA lots and we reach out to those homeowners to let them know what they have in their yard and that it does serve a function and needs to stay there.

8. Are lots with LIDA facilities included on the list of private water quality facilities?
    a. There are actually two lists: one for single family residential lots and one for commercial/industrial properties. Maintenance agreements are recorded for the latter, and each one is inspected every four years. If the facility isn't functioning as it should, we work with the owner to correct it. There are currently no inspections for residential lots.

9. Is there coordination with DEQ during this update process to prevent any surprises at the end?
    a. No, not for Phase I—the requirements are straightforward and we will not be proposing anything that is too unusual.
    b. Phase II actually has built-in checkpoints that we will follow.

10. What is a typical fee-in-lieu amount?
    a. Currently it's about $15,000, which is the typical cost of a minimum swale size. The fee was developed based on a subdivision or partition that couldn't treat, not with a single family homeowner in mind.

11. Could the fee-in-lieu be increased and used in other cases, such as a 6-lot or 10-lot subdivision? If the value of a lot a developer would have to give up to build a swale is $120,000-$150,000, even if the fee-in-lieu was $50,000 instead of $15,000 it is still worth the increased fee to keep the lot.
    a. The limitation there is that LIDA must be the priority. There still needs to be a hierarchy with some sort of vegetated treatment as first choice, and some criteria for deciding when a non-LIDA approach—whether that is filter treatment, fee-in-lieu, etc.—is acceptable.
    b. There may be an opportunity to include an option for a modified fee-in-lieu to contribute toward a project on another site that would have greater overall benefit, if we could look at the watershed as a whole and identify such locations.

12. What is the basis for using 1,000 SF as the treatment threshold?
    a. It comes from the permit requirement that we need to capture and treat 90% of the average annual runoff. The 1,000 SF made the most sense for the developments in this area. Other jurisdictions may have different numbers.

CLEAN WATER SERVICES
DESIGN & CONSTRUCTION STANDARDS

Clean Water Services Advisory Commission Meeting

November 9, 2016

Damon Reische, Development Services Division Manager

Clean Water Services

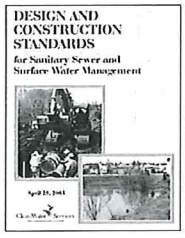
HOW TO STAY INVOLVED IN THE PROCESS

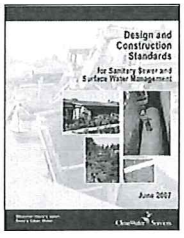
- Check out the D&C Update Webpage
  cleanwaterservices.org/dncupdate
- Get on the Email List (link on webpage)
- Submit comments or questions
  DnCupdate@cleanwaterservices.org

EVOLUTION OF THE DESIGN & CONSTRUCTION STANDARDS

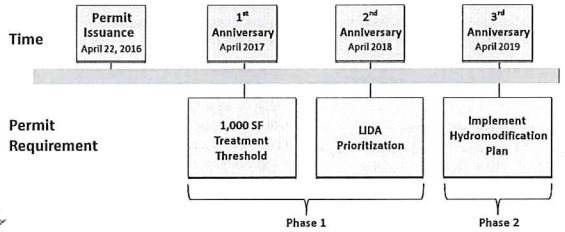
Periodically updated:

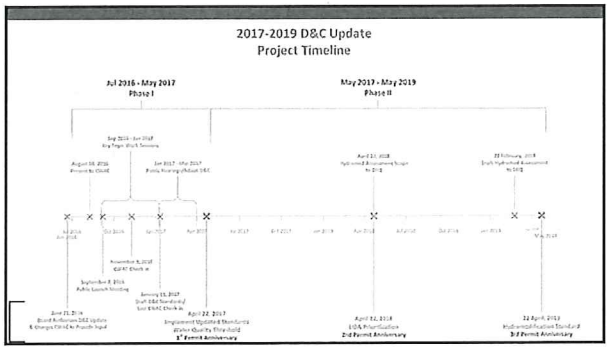
- To clarify existing rules
- In response to new NPDES permit requirements
- In response to other entities' rules (ACOE, DSL, Metro)
- To reflect new technology

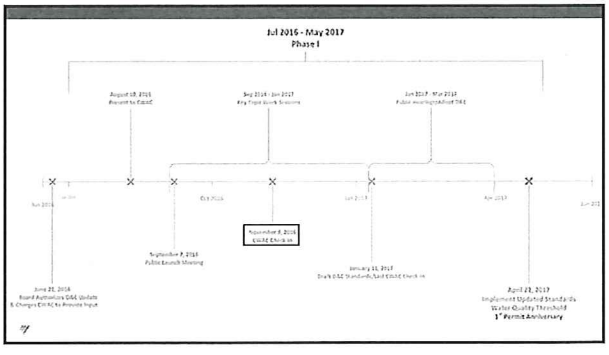




WHY UPDATE D&C NOW?







D&C UPDATE STAKEHOLDER MEETINGS

- CWAC Meeting, Aug. 10, 2016
- D&C Update Kickoff Meeting, Sept. 7, 2016
- Co-Implementer Meeting, Sept. 28, 2016
- Key Topic Meeting, Oct. 6, 2016
- CWAC Meeting, Nov. 9, 2016

Kickoff Meeting

- September 7, 2016
- Approximately 30 stakeholders attended
- Overview of process, timeline and drivers
- Input on Key Topics

Should we have any other Key Topic Discussions?

Stormwater
- LIDA incentives
- Redevelopment Table 4-1
- Storm Master Planning
- Turf fields with underdrains
- Planting requirements for WQ Facilities

Erosion Control
- Erosion Control Permit Threshold
- BMPs for stream/wetland restoration projects

Sanitary
- Sanitary Conveyance from Private System
- Storm Connections to Sanitary (example: trash enclosures, wash pads)

Procedural (Housekeeping)
- Update 1200C/CN language
- Maintenance Plans
- Two Year Maintenance Period for Filter Vaults
- LIDA Lot Submittal Requirements
- Approved Product List
- Model Homes
- Update Standard Details
- Typo and Reference Corrections

Identified Key Topics

1. Treatment Threshold
2. Prioritization of LIDA
3. Redevelopment

Developed Technical Papers

- Background
- Permit Requirement
- Existing Standards
- Definitions
- Alternatives (redevelopment)

Co-Implementer Meeting

- September 28, 2016
- All Co-Implementing Cities and County Invited
- Reviewed Draft Technical Papers
- Asked for input on possible Additional Key Topics

Key Topic Meeting

- October 6, 2016
  Distributed technical papers in advance
- Discussion format
- Nearly 50 stakeholders attended:
  - Builders and Developers
  - Consulting engineers
  - Neighborhood representative
  - Public Agencies

Topic 1: 1,000 SF Treatment Threshold

- No change to standards for:
  - Subdivisions
  - Commercial & industrial development
  - Typical redevelopment project
- Changes will impact:
  - Single family & duplex construction
  - Partitions
  - Remodels, additions, etc.

Stakeholder Input- 1,000 SF Treatment Threshold

- Siting facilities on small projects can be difficult
  - Limited lot size
  - Topography
- Desire for clear and objective Standards
  - Make permitting path easy for homeowners
  - Clear criteria for fee-in-lieu

Topic 2: Prioritization of LIDA & Green Infrastructure

- No change to standards for:
  - Subdivisions
  - Residential construction
- Changes may impact:
  - Single lot development
  - Commercial & industrial
  - Adjoining commercial w/ common parking lot

Topic 2: Prioritization of LIDA & Green Infrastructure

- Vegetated Facilities
- Hierarchy
- Fee-In-Lieu
- Remove barriers in existing codes
- Incentives

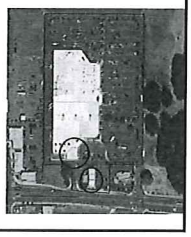
Stakeholder Input- Prioritization of LIDA & Green Infrastructure

- Desire for clear and objective Standards
  - Suggestion for a "decision tree" or sizing tool
- Consider impact to buildable area
- Consider long-term maintenance of LIDA
- Consider challenges with redevelopment sites
  - Physical
  - Fiscal

Topic 3: Redevelopment

In 2012/13 the District and member Cities evaluated several redevelopment alternatives:

- Existing Table 4-1
- Modified Table 4-1
- Scaled Proportional Treatment Ratio
- Simplified Proportional Treatment Ratio



Redevelopment- Current Standard

4.05.5 Impervious Area Used in Design

For redevelopment sites, the impervious area used to design water quality facilities shall be based on Table 4-1.

Existing Impervious Area on Site	Existing Untreated Impervious Area Altered by Redevelopment	Untreated Impervious Area Required to Treat
< 5,280 sq. ft.	≤ 100%	No new treatment required
≥ 5,280 sq.ft. and < 0.5 acres	< 1,000 sq.ft.	No new treatment required
	≥ 1,000 sq.ft.	100% of impervious area
≥ 0.5 acres and < 5 acres	< 1,000 sq.ft.	No new treatment required
	≥ 1,000 sq.ft. and < 25%	Disturbed impervious area + 25% of undisturbed impervious area
	≥ 25% and < 50%	Disturbed impervious area + 50% of undisturbed impervious area
	≥ 50%	100% of impervious area
≥ 5 acres	< 1,000 sq.ft.	No new treatment required
	≥ 1,000 sq.ft. and < 50%	Disturbed impervious area + 50% of undisturbed impervious area
	≥ 50%	100% of impervious area

Modified Table 4-1

Changed to include treatment threshold

Existing Impervious Area on Site	Existing Untreated Impervious Area Altered by Redevelopment	Untreated Impervious Area Required to Treat
< 5,280 sq.ft.	≤ 100%	Altered Area over 1,000 sq. ft. only
≥ 5,280 sq.ft. and < 0.5 acres	< 1,000 sq.ft.	No new treatment required
	>1,000 and < 5,280 sq. ft.	Project area plus 10,000 sq. ft. of undisturbed impervious area, or project area plus remaining impervious on site
	≥ 5,280 sq.ft.	100% of impervious area
≥ 0.5 acres and < 5 acres (Split into 2 categories)	< 1,000 sq.ft.	No new treatment required
	≥1000 sq. ft. and <5,280 sq. ft.	Project area plus 10,000 sq. ft. of undisturbed impervious area, or project area plus 25% of the remaining impervious area on site
	>5,280 sq. ft. and <25%	Project area plus 25% of remaining impervious area on site
	≥ 25% and < 50%	Project area plus 50% of remaining impervious area on site
	≥ 50%	100% of impervious area
≥ 5 acres (Split into 2 categories)	< 1,000 sq.ft.	No new treatment required
	>1,000 sq. ft. and <5,280 sq. ft.	Project area plus 10,000 sq. ft. of remaining impervious area on site
	≥5,280 sq.ft. and < 50%	Project area plus 50% of remaining impervious area on site
	≥ 50%	100% of impervious area

Scaled Proportional Treatment Ratio

New or modified Impervious Area	Treatment Ratio Treatment to Disturbance	Treatment Range
< 1,000 sq. ft.	0	0
≥ 1,000 sq. ft. and < 2,640 sq. ft.	1:1	1,000 sq. ft. – 2,640 sq. ft.
≥ 2,640 sq. ft. and < 10,890 sq. ft. (1/4 ac.)	2:1	5,280 sq. ft. – 21,780 sq. ft. (1/2 ac.)
≥ 10,890 sq. ft. (1/4 ac.) and < 21,780 sq. ft. (1/2 ac.)	3:1	32,670 sq. ft. (3/4 ac.) – 65,340 sq. ft. (1 ½ ac.)
≥ 21,780 sq. ft. (1/2 ac.) and < 87,120 sq. ft. (2 ac.)	4:1	87,120 sq. ft. (2 ac.) – 348,480 sq. ft. (8 ac.)
≥ 87,120 sq. ft. (2 ac.)	5:1	435,600 sq. ft. (10 ac.) +

Simplified Proportional Treatment Ratio

New or modified Impervious Area	Treatment Ratio Treatment to Disturbance	Treatment Range
< 1,000 sq. ft.	0	0
≥ 1,000 sq. ft.	3:1	3 x area disturbed, up to site area

Stakeholder Input- Redevelopment

- Ratio options are preferable for simplicity
- Incentivize net reduction in impervious area
  - Ex. Parking lot conversion to landscaped area
- Continue to allow option to "trade" treatment area

Other Stakeholder Input

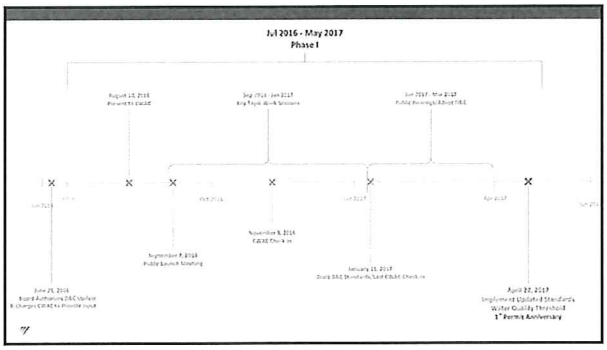
- Desire for clear and objective standards
- Allowance for flexibility by "variance" process
- Consider exemptions for certain activities
  - ADA upgrades, other?
- Implications to projects already being designed
  - Consider phasing implementation of standards

Conceptual Proposal (1,000 SF Threshold & Redevelopment)

- Concepts developed based on stakeholder feedback
- Published concepts to the web Nov. 8th
- Alternatives for Redevelopment (Table 4-1)
- Changes to Impervious Area Used in Design
  - Draft modified Language for Section 4.05.5
  - Schematic to clarify application of treatment standards

Input Requested from Stakeholders

- Feedback on proposed language for Section 4.05.5
- Preference for redevelopment
  - Scaled proportional treatment
  - Simplified proportional treatment
- Requested by Nov. 14, 2016



WHATS NEXT?

- **November/December**
  - Circulate additional draft concepts & selected sections
    - Key Topics
    - EC Permit Threshold
    - Stream/Wetland Enhancement BMPs
  - Develop site comparison for redevelopment alternatives
  - Evaluate fee-in-lieu structure
  - Follow-up Meeting on Key Topics dependent on input received from draft concepts

WHATS NEXT?

- **January**
  - Draft Standards to CWAC & Public
- **February/March**
  - Public Notice and Hearing

HOW TO STAY INVOLVED IN THE PROCESS

- Check out the D&C Update Webpage
  cleanwaterservices.org/dncupdate
- Get on the Email List (link on webpage)
- Submit comments or questions
  DnCupdate@cleanwaterservices.org