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WA State Board of Health

Magna Vista Water Co
PO Box 1323
Washougal, WA 98671

Washington State Board of Health

I hereby attest that the enclosed letter requesting an exemption to WAC 246-290-496 requiring meters to be installed was sent to all members of Magna Vista Water Company on 10/3/2016.

Robert Fraley


Secretary-Treasurer



Washing Machine

NO. 1000

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This letter is a request for exemption on the Washington State Legislation WAC 246-290-496 which requires meters on direct service connections.

We are a small water company providing water to 18 homes. The rules of our incorporation do not permit more homes to join the water system. We feel that the number of homes on our system being only four over the threshold of 14 set by the legislature should be considered as one reason to grant our system an exemption.

We strongly believe that water is a very valuable resource and conservation is extremely important. Our understanding of the requirement for installing direct service meters is to use them as a tool to save on water loss.

The layout of our water system is such that installing meters at the present shut off locations would be difficult and in some cases impossible without major expense. The two main supply line runs are in easements that exist behind four rows of homes instead of in the street in front of the homes. Many of our member's would have to install the meters in their homes or garages due to our mains being in backyards and landscaping that would interfere in those back yards. In some cases, back yard landscaping would have to altered or destroyed to have meters installed at the current shut off locations. About half of our members are retired and living on a fixed income so incurring these expenses would impose a hardship on many of us.

We believe that adding the meters to our homes would not improve the detection of water breaks in supply lines by any measurable degree.

One reason for this belief is that we would be reading the meters on yearly basis. Since our members would have to have meters installed in their homes, garages or back yards. Gaining access to meters would delay timely readings even if they were to be scheduled more often. Thus making the readings ineffective in pointing out specific homes that may be having water loss.

Also, with many meters being in garages or in the homes, service line breaks would not register on the meters of those homes.

So having to go to the expense of installing meters that will not help with water loss due to a service line break does not make sense to us.

When we send out news letters to our members we always request them to notify a board member if they suspect a water leak. In the past year we had two homes where supply line breaks occurred. One of the leaks was found when a wet spot appeared in the back yard of one of our members. The president of our board was contacted. Two board members and a couple of other neighbors dug in the area until the leak was located and a solution decided upon. The second leak was noticed by the neighbor to the

house that had the leak, water was noticed on a rock wall that divides the properties. This time the secretary – treasurer was notified by the member of a possible leak. The president was called and several of us converged on the situation. Again the leak was located, a solution settled on and repairs were done in short order. We contend that these line breaks would not have been found any sooner if meters had been installed.

Magna Vista Water Co system has a source meter. Readings are taken at the first of each month and recorded on an Excel spread sheet where gallons per month and gallons per day are calculated. Daily water use trends can be seen on the spread sheet. As a side note, each month we measure the water level at the well by calculation. During last year's drought no variation in water depth was noted.

Magna Vista Water Co works hard to ensure that our water system is in compliance with all State Board of Health requirements to provide safe drinking water to our members. Our records with the state will reflect this. WAC 246-290-060 states that an exemption may be granted if, due to compelling factors the public water system is unable to comply with the requirements and granting the exemption will not result in an unreasonable risk to the health of consumers. Granting our request will not threaten the safety of our water

For the reasons expressed above, we believe the installation of meters at each member home will not improve water conservation in our case.

We respectfully request an exemption from having to install meters at all direct service connections in our system.

Magna Vista Water Company Board of Directors