

Tuolumne Utilities District 2022 Strategic Plan Progress Report

Goal 1- Enhance and Improve Water Security

Strategy 1. Advance, defend and expand District control over water supply

Action 1	Pursue water rights, water contracts, area of origin rights and/or other methods to improve water supply reliability.	<ul style="list-style-type: none"> PG&E Water Acquisition negotiations on hold through 2023 Continued pursuit of US Bureau of Reclamations contract for water from New Melones Completed Phase 1 of sediment removal of Phoenix Lake
Action 2	Pursue emergency water supplies through water transfers and/or water contracts to mitigate potential impacts of droughts, fires, and other catastrophic events.	<ul style="list-style-type: none"> Master Meter Agreement with Mi-Wuk Mutual WC Ditch outage agreement with Twain Harte Community Services District Pursuing USBR CVP Contract
Action 3	Consider acquisition of water storage and conveyance facilities.	<ul style="list-style-type: none"> PG&E Water Acquisition negotiations on hold through 2023
Action 4	Manage and defend against State and Federal regulatory actions that potentially harm the district's ability to provide a reliable water supply.	<ul style="list-style-type: none"> Addressed State Water Board 401 Certification comments for Phoenix Project #1061 Awaiting FERC Draft Environmental Assessment on Phoenix Project #1061 Awaiting US Forest Service to finalize 4e conditions for FERC 1061

Strategy 2. Reduce system losses and improve water system efficiencies to meet multiple community benefits

Action 1	Identify areas of potential system failure and/or frequent leak maintenance to prioritize repairs, improvements and/or upgrades.	<ul style="list-style-type: none"> Completed Cuesta Heights tank consolidation and distribution improvements Completed Scenic View distribution system and mainline improvements Ridgewood Pipeline Consolidation Project in progress Ponderosa Hills water system consolidation in progress Crystal Falls and Cedar Ridge Interconnection in progress In process of designing a new Zone 4 Tank to replace the failed Zone 3 Tank and also consolidate the White Fir Tank
Action 2	Identify and pursue active pressure zone management to improve reliability and efficiency.	<ul style="list-style-type: none"> Completed Cedar Rock Booster Pump Station Rehabilitation Project Purchased portable generators for multiple pump stations

		<ul style="list-style-type: none"> Through consolidation the district is eliminating pump stations that would frequently result in water service interruptions during power outages and serving customers with pressure from gravity storage tanks. Examples include Saratoga area, and soon the Sommette Hydro.
Action 3	Pursue necessary maintenance and efficiency improvements to the raw and treated water conveyance systems.	<ul style="list-style-type: none"> Algerine Ditch Slum Dam repair completed Pipeline and turbidity station added at Matelot Ditch Dam rehabilitation at the Phoenix Lake Spillway Continued communication and collaboration with PG&E on repairs and maintenance on the Tuolumne Main Canal
Action 4	Conduct studies on the raw water delivery system to improve efficiency and identify construction methods to maintain and enhance the cultural, recreational, and historical integrity of the system.	<ul style="list-style-type: none"> Working with EN2 on biological resource survey
Action 5	Implement Capital Improvement Plan (CIP) and Capital Outlay Budget.	<ul style="list-style-type: none"> Performed annually

Strategy 3. Upgrade and/or consolidate water treatment plants to improve efficiencies and reliability and reduce maintenance and operations costs		
Action 1	Complete land acquisition and preliminary engineering identified in the Treated Water System Optimization Plan (TWSOP).	<ul style="list-style-type: none"> New Sonora Water Treatment Plant land acquisition complete Advance design, permitting, and funding of the Sierra Pines Regional Water Treatment Facility
Action 2	Identify and prioritize improvements to existing infrastructure that will require upgrades and/or replacement to accommodate TWSOP.	<ul style="list-style-type: none"> Obtained \$2.8 million dollar grant for Mt. Provo intertie Installed Ridgewood Transmission line to consolidate Scenic View and Phoenix Lake water systems Conditions assessment performed at Sonora Water Treatment Plant-controls, electrical, chemical storage, and sedimentation basin improvements in process
Action 3	Implement Capital Improvement Plan (CIP) and Capital Outlay Budget.	<ul style="list-style-type: none"> Performed annually

Strategy 4. Enhance and optimize water storage facilities and provide back-up power supplies at pumping and other critical facilities		
Action 1	Identify, prioritize, and implement repairs, upgrades and/or consolidation of water storage reservoirs and/or water storage tanks.	<ul style="list-style-type: none"> Completed Cuesta Heights Tank Consolidation Project Completed Scenic View distribution improvements
Action 2	Identify, prioritize, and implement back-up power supply systems at pump stations and other critical facilities.	<ul style="list-style-type: none"> Obtained \$300,000 grant to purchase 5 generators
Action 3	Implement Capital Improvement Plan (CIP) and Capital Outlay Budget.	<ul style="list-style-type: none"> Performed annually

Strategy 5. Promote water conservation and water use efficiency programs		
Action 1	Maintain and enhance existing water conservation programs and partnerships.	<ul style="list-style-type: none"> Participation in Tuolumne County Drought Task Force
Action 2	Provide customer outreach and assistance in implementing water conservation.	<ul style="list-style-type: none"> TUD website, media coverage Reinstituted toilet rebate program Conservation magnets placed on district vehicles Participated in the annual Home and Garden Show, providing information about water conservation
Action 3	Develop and maintain a community landscape native plant demonstration garden.	<ul style="list-style-type: none"> Board voted against a demonstration garden at this time

Goal 2- Improve Wastewater Collection, Treatment, and Recycled Water Use through Facility Modernization

Strategy 1. Upgrade and/or replace outdated and inefficient wastewater treatment facilities

Action 1	Create new regional septage receiving facilities.	<ul style="list-style-type: none"> Sonora Regional Wastewater Treatment Facility (WWTF) Improvements are 30% complete
Action 2	Replace and upgrade sludge drying equipment and facilities.	<ul style="list-style-type: none"> Addressed in Sonora Regional WWTF Project
Action 3	Identify, prioritize, and implement wastewater treatment plant (WWTP) equipment and facility upgrades and improvements, including, but not limited to, improved security, road construction, lighting, administrative facilities, treatment processes, storm water conveyance, and other equipment and facilities	<ul style="list-style-type: none"> Addressed in Sonora Regional WWTF Project
Action 4	Prepare Title 22 Report and apply for new wastewater treatment and disposal permit (Waste Discharge Requirements – “WDR”).	<ul style="list-style-type: none"> Currently in progress and addressed in Sonora Regional WWTF Project
Action 5	Identify and obtain easements and rights-of-way for district facilities where required.	<ul style="list-style-type: none"> Acquired encroachment for Crossroads Lift Station Project Obtained City of Sonora easement for pipeline to new plant Land acquisition in process for Willow Springs Lift Station Obtained easement for Mono Village Lift Station abandonment project
Action 6	Implement Capital Improvement Plan (CIP) and Capital Outlay Budget.	<ul style="list-style-type: none"> Performed annually

Strategy 2. Repair and/or replace aging wastewater collection pipelines, Twain Harte Interceptor, and lift stations to avoid sewer spills

Action 1	Prioritize and implement a plan to repair and/or replace collection system infrastructure.	<ul style="list-style-type: none"> Performed annual sewer lining and pipeline maintenance and replacement – for FYs 2021 and 2022: <ul style="list-style-type: none"> Pipe Lining – 8,545 feet
----------	--------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<ul style="list-style-type: none"> ○ QAQC Video Inspection – 11,898 feet ○ Rehab/Repair/Replace/Pipe Patch – 2,325 feet
Action 2	Prioritize and implement a plan to repair and/or replace Twain Harte Interceptor and to determine what customers can connect to these systems.	<ul style="list-style-type: none"> • Assessed nearly 50% of the Twain Harte interceptor in-house including 11,000 feet, 5 of 14 siphons and removal of 5 plug valves improving flow and capacity.
Action 3	Prioritize and implement a plan to repair, improve and/or replace wastewater collection system lift stations.	<ul style="list-style-type: none"> • Improved and/or replaced Saratoga, Columbia Village, Phoenix Lake Park, Apple Valley, and Damin Rd. Lift Stations • New washer/compactor installed at Law & Justice Center (funded by Tuolumne County) • Parrotts Ferry and Mill Villa lift station improvements in progress • Completed Mono Village Lift Station design. Project is currently in progress
Action 4	Identify potential areas for new customer connections due to failing private systems.	<ul style="list-style-type: none"> • Background water sampling conducted in the Crystal Falls area to identify possible future connections

Strategy 3. Secure long-term recycled water reclamation sites		
Action 1	Through land purchases, easements and/or contracts, obtain long-term rights to recycle treated effluent for beneficial uses.	<ul style="list-style-type: none"> • Established agreement with TELELI
Action 2	Implement Capital Improvement Plan (CIP) and Capital Outlay Budget.	<ul style="list-style-type: none"> • Performed annually

Goal 3- Develop Partnerships for the Benefit of the Community		
Strategy 1. Coordinate work with local agencies (City, County, Special & School Districts, Tribes, community organizations, etc.)		
Action 1	Work closely with local agencies to coordinate construction projects to maximize cost savings and reduce public inconvenience.	<ul style="list-style-type: none"> • Participate in utility coordination meetings annually, every Spring • Successful collaboration with the County on Pedro Y Intersection Project • Established agreement with County to utilize GIS staff resulting in labor cost savings • Received County support in purchasing washer/compactor at Law & Justice Center Lift Station
Action 2	Set-up periodic multi-agency meetings with staff and elected officials to establish local priorities and to make plans for joint activities.	<ul style="list-style-type: none"> • Participate in utility coordination meetings annually, every Spring
Action 3	Seek local partnerships to obtain grant funding for multiple benefits.	<ul style="list-style-type: none"> • TEDA – grant-funded Ponderosa Hills water system improvements • Curtis Creek Elementary School – grant-funded consolidation project • USFS and Fire Safe Council – fuels reduction grants • Working with Muller Mutual WC to secure funding to consolidate • Work with County and City on CDBG Funding Applications

Strategy 2. Work with regional agencies and industry associations to further District goals and priorities		
Action 1	Work closely with Mountain Counties Water Resources Association (MCWRA), the Association of California Water Agencies (ACWA), Water Environment Federation (WEF), California Special Districts Association (CSDA) and other industry organizations to promote District interests.	<ul style="list-style-type: none"> • Multiple Board members sit on association board committees • Staff and board members attend association committee meetings and conferences

Action 2	Cultivate leadership roles for District Directors in regional and industry associations and committees to maximize District involvement in key issues of importance.	<ul style="list-style-type: none"> • Mountain Counties Water Resource Association and Legislative Committee • LAFCO • IRWM JPA • ACWA-JPIA
Action 3	Seek regional partnerships to obtain grant funding for multiple benefits.	<ul style="list-style-type: none"> • Actively participate in Cal OES, USDA, SNC and IRWM

Strategy 3. Work with local, State and Federal agencies and elected officials on permitting, grant programs, water rights, and regulatory/legislative issues		
Action 1	Work closely with Department of Water Resources (DWR), the Bureau of Reclamation, the U.S. Department of Agriculture (USDA) and other water purveyors on obtaining grant funding for facilities and on obtaining water rights.	<ul style="list-style-type: none"> • USDA: Sierra Pines • State Waterboard: Sierra Pines • USBR: CVP Contract • USDA: Grant and Loan for SRWWTF
Action 2	Seek new operational permits and grant funding for facility consolidation and upgrades through State and Federal agencies.	<ul style="list-style-type: none"> • Sierra Pines • Curtis Creek Elementary School • Muller Mutual WC • Cuesta Heights • Mt. Provo Transmission • Mill Villa Well
Action 3	Seek local, State, and regional partnerships to obtain grant funding for projects that provide multiple benefits to the community.	<ul style="list-style-type: none"> • Obtained \$2.8 million dollar grant for Mt. Provo and Ponderosa intertie benefiting district and Tuolumne Band of Me-Wuk Indians • Curtis Creek Elementary School water reliability and quality to benefit students, staff and families, and improved fire flow to the town of Standard
Action 4	Continuously monitor regulatory issues, legislation, and environmental standards in coordination with local, state, and federal agencies.	<ul style="list-style-type: none"> • Continue to subscribe to numerous distribution and list-serv groups • Actively seeking grant opportunities

Action 5	Acquire consulting expertise to promote District interest in legislative and regulatory issues and assistance in securing State, Federal and Private grant funding	<ul style="list-style-type: none"> The district no longer utilizes legislative advocates as of early 2022; however, utilizes other resources such as ACWA, MCRWA and CSDA bill tracking
----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<i>Strategy 4. Coordinate land use and water/wastewater resources planning with Local, Tribal, Regional and State planning agencies</i>		
Action 1	Coordinate General Plan update and implementation with City and County.	<ul style="list-style-type: none"> Significant efforts have been made to coordinate updates and implementations
Action 2	Seek special district representation on LAFCO with other local agencies	<ul style="list-style-type: none"> Current Board member represents District on LAFCO

Goal 4- Enhance Programs to Promote Organizational Efficiency and Development

Strategy 1. Use the Joint Labor - Management Committee (JLMC) to improve organizational communication and decision-making

Action 1	Schedule regular meetings of the JLMC to discuss issues and activities.	<ul style="list-style-type: none">• Quarterly meetings held in 2019• Frequent correspondence with labor representative
Action 2	Seek input from JLMC members on employee training, succession planning, job functions and other employee issues.	<ul style="list-style-type: none">• Management regularly seeks input from staff at all levels, union and non-union

Strategy 2. Prioritize employee job training/cross-training to improve employee skills and organizational flexibility

Action 1	Utilize department, district-wide and outside trainers in developing curriculum to train and cross-train employees.	<ul style="list-style-type: none">• See department SOPs, succession plan, LCW ERC Consortium Schedule, and Safety Plan of Action
Action 2	Develop incentives for employees to train and cross-train.	<ul style="list-style-type: none">• Created clear job descriptions to identify career tracks• Established cross training in Operations Department, and increased cross-training for redundancy across all departments• Added cross training goals on annual performance evaluations
Action 3	HR Department to maintain and develop training records guidelines and to enhance succession planning opportunities.	<ul style="list-style-type: none">• Utilized tracking software for employee training completion• Training schedules and plans, clear job descriptions, annual performance goals

Strategy 3. Maintain active Safety Training, Emergency Preparedness and Risk Management Programs

Action 1	Prioritize safety training and develop incentives for participation.	<ul style="list-style-type: none">• Safety Committee• Monthly Safety Meetings• Fall Safety Recognition Event
Action 2	HR Department to maintain safety records and coordinate safety training program guidelines.	<ul style="list-style-type: none">• Annual Safety Plan of Action

Action 3	Continue to evaluate District wide risk of facilities to enhance safety and security	<ul style="list-style-type: none"> • Routine safety site inspections performed by Safety Committee and staff • Annual safety inspections with safety consultant • Biannual inspections with property/liability coverage vendor • Biennial Hazardous Materials Business Plan Inspections • Operator Permit Headquarters Inspections
Action 4	Coordinate with Local, Tribal, Regional, State and Federal agencies on emergency preparedness and response.	<ul style="list-style-type: none"> • Phoenix Dam EAP and TTX • Emergency Response Plan (ERP) TTX • Participation in PG&E annual emergency drill for Phoenix and Spring Gap Dams

Strategy 4. Support and enhance Board, Management and Staff educational and leadership opportunities to better serve the community

Action 1	Encourage participation at local, regional, and state-wide events that provide Board, Management and Staff training and leadership opportunities.	<ul style="list-style-type: none"> • Coordinated Board Meeting with TC BOS and City of Sonora in May 2022 • Board workshops attended by management, community partners and consultants
Action 2	Create opportunities for joint Board – Management training sessions.	<ul style="list-style-type: none"> • Strategic Planning overview and discussion with Board • Plant design presentations provided to Board • Association Conferences

Strategy 5. Identify policies and procedures to improve efficiency in District communication

Action 1	Perform comprehensive update of District wide policies and procedures.	<ul style="list-style-type: none"> • Water Rules and Regulations updated • Wastewater Ordinance updated • Purchasing and Investment Policies updated • Health and Safety Policies updated • Personnel Policy needs update
----------	------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Goal 5- Follow Best Financial Management & Fiscal Planning Practices**Strategy 1. Identify and prioritize projects through the Capital Improvement Plan and Budget**

Action 1	Annually review the Capital Improvement Plan in order to adjust and re-prioritize projects and construction activities to determine progress in completing priority capital projects.	<ul style="list-style-type: none">• Performed annually
Action 2	Annually review and update the budget.	<ul style="list-style-type: none">• Performed annually

Strategy 2. Determine appropriate grant funding opportunities and priorities

Action 1	Submit grant applications for high priority projects to maximize rate payer funds with eligible grants.	<ul style="list-style-type: none">• Grant Awards:<ul style="list-style-type: none">○ USDA - grant and loan for SRWWTF○ USFS - Water Tank and Conveyance System Fuels Reduction at Brentwood Facility○ CalFire CCI- Critical Facilities Fuels Reduction Project○ DWR – Mill Villa Well Replacement Project○ DWR – Mt. Provo Water Transmission and Intertie○ SWRCB – Curtis Creek El School Water Main Extension (Consolidation)○ SWRCB – Cuesta Heights Tank and Distribution System○ SNC – Fuels Reduction for The Lyons-South Fork Watershed Forest Resiliency Project (Shaded Fuel Break)○ CalOES – Purchase five backup power generators
Action 2	Coordinate grant applications with local, private, regional, and state agencies/organizations to obtain multiple community benefits and enhance chances for grant award.	<ul style="list-style-type: none">• Awarded multiple wildfire risk reduction/vegetation management grants with USFS, CalFire and Tuolumne County Fire Safe Council• Sent letter of support to Stanislaus National Forest Social and Resilience Across the Landscape (SERAL)

		<ul style="list-style-type: none"> Coordinated TUD grant-funded Mt. Provo Water Transmission and Intertie with Tuolumne Band of Me-Wuk Indians' grant funded project for new tank and reservation distribution improvement project. Curtis Creek Elementary School Water Main Extension and Consolidation Project Collaborating with Muller Mutual WC on a grant application to consolidate
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Strategy 3. Identify areas to reduce costs, increase revenues, consolidate services, and improve efficiencies to provide cost-effective services		
Action 1	Analyze District organization and methods of service delivery to determine if cost savings and consolidations are feasible.	<ul style="list-style-type: none"> Created additional construction/maintenance crew to mitigate uncertain bidding environment and increase in-house construction capabilities. Drone use for inspection and public outreach Easements writing and basic surveying done in-house
Action 2	Seek methods to improve efficiencies and reduce lead-time on designing and constructing capital improvements.	<ul style="list-style-type: none"> Maximizing in-house design and construction Exploring progressive design project delivery for Sierra Pines
Action 3	Explore revenue enhancements by analyzing current return on investments, conducting a Proposition 218 study in calendar year 2020, seeking grant funding where appropriate, identifying the cost/benefit of extending services to new customers and investigating a District-wide assessment district.	<ul style="list-style-type: none"> Hired investment advisor and implemented investment strategy Prop. 218 related to acquisition of the PG&E portion of water system postponed. Awarded USDA Grant and loan for SRWWTF Investigated District-wide assessment district and determined not a viable option at this time
Action 4	Implement new technology and computer hardware and software to improve internal accounting and project management, as well as asset management, mapping, and maintenance and repair of equipment and facilities.	<ul style="list-style-type: none"> Successful Tyler software conversion completed in FY19 Ongoing technological enhancements implemented Continued analysis and improvements made to cyber security Drone use for visual inspections.

Action 5	Review current District policies and procedures with an eye on improving efficiencies and reducing “red tape”.	<ul style="list-style-type: none"> Routinely assess and evaluate policies and procedures
----------	----------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------

Strategy 4. Maintain a structurally balanced budget, utilize user fees to cover the cost of services provided, maintain adequate reserves in all funds, and maintain financial Records in accordance with Generally Accepted Accounting Principles (GAAP)

Action 1	Review current policies and procedures for consistency with Best Management Practices.	<ul style="list-style-type: none"> Performed routinely by Finance Director Received “clean audit” by independent auditors in FY20 and FY21
Action 2	Revise and update administrative policies and bring revised/new policies to the Board for adoption.	<ul style="list-style-type: none"> Revised and updated Purchasing Policy, Reserves Policy, Capital Asset Definitions & Guidelines, Conflict of Interest Code, Record Keeping & Retention Schedule, Travel Expense Policy, Board of Directors Policy Manual, Cell Phone and Electronic Device Policy, Water Leak Adjustment Policy, and Investment Policy.

Goal 6- Apply Best Customer and Community Service Practices		
Strategy 1. Maintain a high-level of customer service as a top priority for the District		
Action 1	Provide customer service training for new employees, as well as on-going training for existing employees.	<ul style="list-style-type: none"> Onboarding for new employees and ongoing on-the-job training and coaching provided by supervisors
Action 2	Develop, identify, and promote activities and policies that focus on customer relationships, treating customers with respect, responding to customer inquiries in a timely manner and listening to what customers have to say.	<ul style="list-style-type: none"> Continued commitment to provide outstanding internal and external customer service All staff consistently provides exemplary customer service with every customer interaction – focus on being good listeners, empathetic, informative, and problem solvers.

Strategy 2. Provide a high-level of community outreach and engagement in respect to District activities, projects and issues		
Action 1	Maintain an active website with up-to-date information on District activities, issues, and projects.	<ul style="list-style-type: none"> Maintain active website and Facebook page with up-to-date information on District activities, news, and projects
Action 2	Provide for community feedback, review and response to comments received as a result of outreach activities.	<ul style="list-style-type: none"> Personal interviews conducted with community members seeking feedback on high-profile projects and initiatives. Direct public access via website to sign up for newsletters, project updates, ask questions, etc.
Action 3	Issue periodic newsletters, surveys, notices, and other materials to inform and seek input from members of the public, local agencies, community organizations and stakeholders.	<ul style="list-style-type: none"> Bi-monthly On Tap Newsletter New Customer Letters Social Media page Regular news releases to all media and local partners Participate in annual Home and Garden Show and other community events
Action 4	Enhance, develop, and market programs that benefit District customers.	<ul style="list-style-type: none"> Revised and enhanced toilet rebate program Continue promoting water conservation and how to be water wise

Goal 7 Pursue Environmental Stewardship Opportunities and Community Programs		
<i>Strategy 1. Identify projects, activities and programs with multiple community benefits and prioritize for implementation</i>		
Action 1	Seek local, regional, and state-wide partners to improve project success and community involvement.	<ul style="list-style-type: none"> • Personal interviews with various community leaders and members of the public seeking input. • Participated in Board Meeting with TCBOS, City of Sonora and Tribes to inform and communicate water rights acquisition • Held meetings with interested community members and USFS
Action 2	Seek community input and partnerships to manage community activities on District properties and facilities where appropriate.	<ul style="list-style-type: none"> • Held public meetings to discuss recreational improvements at Sierra Pines
<i>Strategy 2. Provide community outreach in the early stages of project or program development</i>		
Action 1	During the initial stages of project and/or program development identify communities of potential impact and seek consultation and input.	<ul style="list-style-type: none"> • CEQA process involves both public and tribal outreach at the initial stages of project • Notice and Right of Entry from property owners on vegetation management and fuels reduction project
Action 2	During the initial stages of project and/or program development identify community and agency partnerships that will allow for greater community benefits.	<ul style="list-style-type: none"> • Continued collaboration efforts with the County, owner of Standard, SPI, and others on the Curtis Creek Elementary School Project • Continued talks with Tuolumne City Fire Department and TCSD on proposed water and sewer mainline • Currently working with EN2 on identifying ways to improve vegetation management practices.
<i>Strategy 3. Use resources efficiently, reduce waste and minimize negative impacts to the environment</i>		
Action 1	Practice resource conservation by making the most efficient use of resources and energy saving devices when developing District projects.	<ul style="list-style-type: none"> • Installed new, more efficient thermostat in Administration building

Action 2	Practice pollution prevention by minimizing contamination to the environment through thoughtful project design and the incorporation of redundant systems and backup energy supplies.	<ul style="list-style-type: none"> • Continually evaluating sources of renewable I energy • SRWWTF design • Maintain NPDES Permit for distribution system
Action 3	Incorporate occupational health and safety considerations into projects and facilities where employees will be working.	<ul style="list-style-type: none"> • Engineered controls and features incorporated into project design and implementation for health and safety of all employees